Grading Counterterrorism Cooperation with the GCC States

Katherine Bauer
Blumenstein-Katz Family Fellow, The Washington Institute for Near East Policy

Testimony submitted to the House Foreign Affairs Committee
Subcommittee on Terrorism, Nonproliferation, and Trade
Subcommittee on the Middle East and North Africa

April 26, 2018

Chairman Poe, Ranking Member Keating, Chairwoman Ros-Lehtinen, Ranking Member Deutch, and distinguished members of the subcommittees, thank you for the opportunity to testify today on Gulf state counterterrorism efforts. This hearing comes at a critical time. Years of conflict in Syria, Iraq and Yemen have proven fertile ground for terrorist groups and extremist ideologies. Terrorist groups have sought and achieved safe havens in weak or failed states from which to recruit, train, plot and conduct attacks, as well as to extract resources and aggregate funds.

The Gulf states have been important U.S. partners in countering these threats. Since 9/11, the United States has made great, albeit often unequal, strides in working with our various partners in the Gulf, and counterterrorist financing has been at the heart of such cooperation. Across the Gulf, alongside efforts to encourage the development of partner capacity, establish appropriate legal frameworks, and develop key agencies and personnel, the United States dramatically increased information sharing and sought to galvanize political will among Gulf partners to act both jointly with and independently of the United States to stymie terrorist financing.

Such cooperation remains essential today. Its importance is reflected in the fact that terrorist financing is among the grievances that has fueled the rift between Qatar on the one hand and Saudi Arabia, the United Arab Emirates, Bahrain and Egypt on the other. It is also important because of the evolution and increasing complexity of terrorist financing to involve more diverse sources of funds, as we have seen with the so-called Islamic State, among others.

My testimony today will focus on these counterterrorist financing issues. First, I will discuss the GCC rift. Next, I will look in detail at the records of Kuwait and Qatar on counterterrorist financing issues. Finally, I will look at the evolution of the terror finance threat, and offer a few recommendations on the way forward in working with all GCC states to strengthen their ability to respond to this complex threat.

THE GCC RIFT

In the ten months since the UAE, Saudi Arabia, Bahrain, and Egypt (the Arab Quartet) imposed a diplomatic embargo on their neighboring Arab Gulf state, prominent among their complaints has been Qatar's support for Islamist extremist groups, whether through media outlets, hosting senior officials, or funding by Qatari individuals. However, it is unlikely that resolving the Arab Quartet's concerns about Qatari counterterrorism financing deficiencies would end the rift. Rival media smear campaigns have targeted both foreign and domestic audiences further entrenching public opinion. As the rift has dragged on, parties on both sides appear to be only increasingly (and literally) dug in: Saudi media recently reported that the kingdom will dig a canal near the Saudi-Qatari border and place its nuclear waste dump in the Saudi land between the canal and Qatar to geographically isolate its neighbor.[1]

Nonetheless, the United States should continue to work to alleviate the impact of the rift on counterterrorism and other security cooperation. Travel and port restrictions create logistical headaches for the U.S. military operating from the largest U.S. base in the Middle East, al-Udeid, as well as for other U.S. official efforts: a recent meeting of the U.S.-GCC Terrorist Financing Targeting Center (TFTC), established in Riyadh on the margins of President Trump's visit there just prior to the beginning of the rift, had to be held in Kuwait so that Qatar could attend.[2] The center's physical headquarters was inaugurated in Riyadh by Treasury Secretary Steven Mnuchin in October 2017.[3]

The rift is a distraction from the many pressing issues that face all parties involved. It takes up precious time of Gulf State officials. Given the Gulf states' small native populations and the necessity that national security positions be filled by citizens, they generally lack a deep bench of such officials. For example, Kuwait's role as mediator in the rift risks crowding out U.S. efforts to push Kuwait to remedy its own counterterrorist financing deficiencies. The blockade has arguably had some modest impact of pushing Qatar closer to Iran[4], despite U.S. efforts to mount a joint U.S.-GCC effort to contain the Islamic Republic.

The rift has focused attention on Qatar's counterterrorist financing deficiencies with the result that others in the region—in particular Kuwait—have arguably been given a pass. In reality, each Gulf state faces its own deficiencies, vulnerabilities, and barriers to actions against terror finance. While I focus in this testimony on Qatar and Kuwait, largely out of a

---

[1] Brennan, David, "Saudi Arabia wants to dump nuclear waste on the Qatari border to make its arch enemy an island," Newsweek, 10 April 2018. Web. http://www.newsweek.com/saudi-arabia-wants-dump-nuclear-waste-qatari-border-make-enemy-island-879072

[2] "Qatar takes part in TFTC meet in Kuwait," The Peninsula, March 9, 2018. https://thepeninsulaqatar.com/article/09/03/2018/Qatar-takes-part-in-TFTC-meet-in-Kuwait

[3] "Secretary Mnuchin Leads Middle East Trip Focused on Combatting Terrorist Financing," Press Center, U.S. Department of the Treasury, Oct. 20, 2017. Web. https://www.treasury.gov/press-center/press-releases/Pages/SM0185.aspx

[4] While some reports have pointed out that goods from Iran have doubled as a share of Qatari imports, it remains at a very low level. "Qatar's non-oil exports in first 9 months of 2017 stand at QR13.3bn," Gulf Times, Oct. 22, 2017. Web. http://www.gulf-times.com/story/568272/Qatar-s-non-oil-exports-in-first-9-months-of-2017-; Arefmanesh, Sepehr, "Iran Exports to Qatar Up 117%," Financial Tribune, Nov. 19, 2017. Web. https://financialtribune.com/articles/economy-domestic-economy/76398/irans-economic-ties-with-qatar-booming-exports-up-117

desire to provide a complete picture that is often missing in the PR-fueled Gulf rift, the Gulf countries of the Arab Quartet have their own problems as well.

The scope of the challenge facing Saudi Arabia is perhaps greater than any other Gulf state, with more than two thousand Saudis fighting for terrorist organizations in foreign conflicts, largely in Syria.[5] Both ISIS and al-Qaeda continue to call for attacks against the kingdom, and despite serious efforts on the counterterrorist financing front, Saudi individuals likely continue to serve as a source of funding for terrorist groups.[6]

The UAE has inherent vulnerabilities to terrorist and other illicit financing due to its role as a regional commercial and financial hub. The large number of exchange houses, general trading companies, and hawalas create "an environment susceptible to bulk cash smuggling, trade based money laundering, and the raising and transferring of funds for illicit activity."[7] With more than 15 million travelers to Dubai alone in 2017[8], the UAE also faces challenges in identifying and acting against UN-designated terrorist financiers in its territory. According to the *Washington Post*, the United States and UAE missed an opportunity to detain UN-designated Taliban leader Akhtar Mohammad Mansour on a trip to Dubai in spring 2016.[9] The UAE faces significant challenges in coordinating across a bifurcated regulatory setting between onshore and offshore financial activity, as well as between the country's two security services, which respectively cover Dubai, the primary financial and commercial center, and Abu Dhabi, the capital.

Bahrain has zealously applied anti-money laundering and counterterrorist financing measures, notably against a Shia cleric for collecting *khums*, a sort of tax paid by Shia to be used by clergy to help the needy.[10] Even before this specific instance, the State Department warned that Bahrain's "potential politicization of terrorist finance and money laundering issues threatens to conflate legitimate prosecutions of militants with politically motivated actions against the mainstream, nonviolent opposition and Shia community."[11]

---

[5] "Country Reports on Terrorism 2016: Middle East and North Africa," U.S. Department of State. https://www.state.gov/j/ct/rls/crt/2016/272232.htm

[6] Ibid.

[7] Ibid.

[8] "15.8 million people visited Dubai in 2017," Gulf News, Feb. 7, 2018. Web. https://gulfnews.com/business/sectors/tourism/15-8-million-people-visited-dubai-in-2017-1.2169807

[9] Jaffe, Greg & Ryan, Missy, "A Dubai shopping trip and a missed chance to capture the head of the Taliban," The Washington Post, Mar. 24, 2018. Web. https://www.washingtonpost.com/world/national-security/a-dubai-shopping-trip-and-a-missed-chance-to-capture-the-head-of-the-taliban/2018/03/24/0137dd66-2ba0-11e8-8ad6-fbc50284fce8_story.html

[10] Reuters Staff, "Bahrain's top Shi'ite cleric gets one year suspended jail sentence," Reuters, May 21, 2017. Web. https://www.reuters.com/article/us-bahrain-security-trial/bahrains-top-shiite-cleric-gets-one-year-suspended-jail-sentence-idUSKBN18H07C

[11] "Country Reports on Terrorism 2016: Middle East and North Africa," U.S. Department of State. https://www.state.gov/j/ct/rls/crt/2016/272232.htm

The United States should continue to work both bilaterally and multilaterally to strengthen all Gulf states' capability and will to implement the appropriate legal, regulatory, and operational measures to counter these threats.

KUWAIT AND QATAR

In the past, Kuwait and Qatar were often lumped together when discussing terror finance in the Gulf. Kuwait was named alongside Qatar as a "permissive jurisdiction" for terrorist financing by a Treasury official in 2014.[12] The focus on Qatar of late has in effect given Kuwait a pass, and Kuwait's role as a mediator in the Gulf rift has likely crowded out U.S. efforts to pressure Kuwait to act. According to the most recent State Department Country Report on Terrorism, "a number of UN-designated terrorist financiers continued to operate in Kuwait."[13]

Underpinning Kuwait's inaction, Kuwait scholar Lori Plotkin Boghardt observed in 2014, is that "tightening the noose around local fundraising for Syria-based extremist groups would invite the wrath of powerful Salafist politicians and clerics who have been at the forefront of Kuwait's private fundraising scene."[14] Indeed, in 2014, Kuwait's Minister of Justice and Awqaf (endowments), Nayef al-Ajmi, was forced to resign after being called out by a U.S. official for his association with fundraising efforts for "a prominent al-Nusra Front financier." Following Ajmi's appointment, according to the United States, "the Ministry of Awqaf announced it would allow non-profit organizations to collect donations for the Syrian people at Kuwaiti mosques, a measure we believe can be easily exploited by Kuwait-based terrorist fundraisers."[15]

In the interim, Kuwait has taken efforts to intensify charity supervision, including closing two domestic charities for "illegal fundraising for foreign beneficiaries."[16] Notably, in 2016, Kuwait's Ministry of Social Affairs prohibited cash donations to charitable causes during Ramadan, insisting on credit card or other electronic funds transfer to enable financial authorities to monitor such transfers and prevent misuse.[17]

The United States continues to publicly identify Kuwait-based terrorist financiers. Most recently, in March 2017, the United States designated "prominent al-Nusra Front and al-Qaeda

---

[12] "Remarks of Under Secretary for Terrorism and Financial Intelligence David Cohen before the Center for a New American Security on 'Confronting New Threats in Terrorist Financing," Press Center, U.S. Department of the Treasury, 03 April 2014. Web. https://www.treasury.gov/press-center/press-releases/Pages/jl2308.aspx
[13] "Country Reports on Terrorism 2016: Middle East and North Africa," U.S. Department of State. https://www.state.gov/j/ct/rls/crt/2016/272232.htm
[14] Lori Plotkin-Boghardt. "Policywatch 2247: The Terrorist Funding Disconnect with Qatar and Kuwait," Washington Institute for Near East Policy, May 2, 2014. http://www.washingtoninstitute.org/policy-analysis/view/the-terrorist-funding-disconnect-with-qatar-and-kuwait.
[15] "Remarks of Under Secretary for Terrorism and Financial Intelligence David Cohen before the Center for a New American Security on 'Confronting New Threats in Terrorist Financing," Press Center, U.S. Department of the Treasury, 03 April 2014. Web. https://www.treasury.gov/press-center/press-releases/Pages/jl2308.aspx
[16] "Country Reports on Terrorism 2016: Middle East and North Africa," U.S. Department of State. https://www.state.gov/j/ct/rls/crt/2016/272232.htm
[17] Ibid.

financier" Mohammad Hadi al-Anizi, discussed below for his ties to Abd al-Rahman al-Nuaymi.[18] Anizi, according to Treasury, is based in Kuwait, from which he has "provided extensive material and financial support to ANF since at least 2014." The press statement, however, traces Anizi's ties to AQ back to 2007 and adds that, in mid-to-late 2014, Anizi was "appointed as AQ's representative in Syria by AQ senior leadership."[19] Taken together, one has to wonder if Anizi only recently returned to Kuwait from Syria.

With regard to ISIS, which has been the primary terrorist threat to Kuwait, a number of cases have been prosecuted with mixed success under Kuwait's anti-money laundering and counterterrorist financing law, which was only adopted in 2014.[20] In 2016, Kuwait tried twelve citizens charged with providing support to ISIS. Of the twelve, Kuwait "abstained from punishing" seven of them resident in Kuwait. The other five, tried in absentia, were sentenced to ten years' hard labor.[21]

Qatar's record leaves much to be desired as well. For a number of years, a Treasury official revealed in 2014, "several major Qatar-based fundraisers [have acted] as local representatives for larger terrorist fundraising networks that are based in Kuwait."[22]

While Qatar took a number of limited actions against individual terrorist financiers during this period—freezing assets, imposing travel bans, shutting down accounts, and pursuing a number of prosecutions[23]—implementation has been thoroughly mixed, as my colleague Matthew Levitt detailed in his July testimony in front of the House Foreign Affairs Committee, and as we have written about jointly.[24] Qatar has been reluctant to take credit publicly for the steps they have taken—which is not uncommon across the Gulf—and largely in response to considerable U.S. pressure.

---

[18] "Treasury Sanctions Prominent Al-Nusrah Front and Al-Qa'ida Facilitator," Press Center, U.S. Department of the Treasury, March 14, 2017. Web. https://www.treasury.gov/press-center/press-releases/Pages/sm0027.aspx

[19] Ibid.

[20] "Country Reports on Terrorism 2016: Middle East and North Africa," U.S. Department of State. https://www.state.gov/j/ct/rls/crt/2016/272232.htm

[21] Al-Enezi, Meshaal, "Dozen sentenced of supporting IS," Kuwait Times, Jan. 10, 2016. Web. http://news.kuwaittimes.net/website/dozen-sentenced-of-supporting-is/

[22] "Remarks of Under Secretary for Terrorism and Financial Intelligence David Cohen before the Center for a New American Security on 'Confronting New Threats in Terrorist Financing," Press Center, U.S. Department of the Treasury, 03 April 2014. Web. https://www.treasury.gov/press-center/press-releases/Pages/jl2308.aspx

[23] "Readout of Secretary Tillerson's Meeting with Qatari Foreign Minister Al Thani," News & Events, U.S. Embassy Doha, 09 May 2017. Web. https://qa.usembassy.gov/secretary-tillersons-meeting-qatari-foreign-minister-al-thani/

[24] United States. Cong. House. Committee on Foreign Affairs, Subcommittee on the Middle East and North Africa. Hearing on Assessing the U.S.-Qatar Relationship Jul. 26, 2017. 113th Cong. Washington: GPO, 2017 (statement of Dr. Matthew Levitt, Director and Fromer-Wexler Fellow, Stein Program on Counterterrorism and Intelligence, The Washington Institute for Near Easy Policy). https://docs.house.gov/meetings/FA/FA13/20170726/106329/HHRG-115-FA13-Wstate-LevittM-20170726.pdf; Levitt, Matthew & Bauer, Katherine, "Qatar Doesn't Need a Blockade. It Needs an Audit," Foreign Policy. June 15, 2017. Web. https://foreignpolicy.com/2017/06/15/qatar-doesnt-need-a-blockade-it-needs-an-audit-al-qaeda/

For example, although the 2014 State Department Country Report on Terrorism credited Qatar with shutting down Saad al-Kaabi's online fundraising platform, Madad Ahl al-Sham, which was "suspected of sending funds to violent extremist elements in Syria,"[25] a 2017 Treasury designation of Kuwait-based financier Muhammad Hadi al-Anizi noted that Kaabi was still actively involved in financing AQ in Syria at least a year later in 2015.[26] The U.S. Treasury designated Kaabi as a financial supporter of al-Qaeda and ANF in 2015.[27] Kaabi was found responsible for raising funds for ANF to purchase weapons and food, as well as facilitating the ransom payment for a hostage held by ANF in early 2014. Kaabi worked for ANF in Syria since at least late 2012.[28]

In another case, the U.S. Treasury sanctioned 'Abd al-Malik 'Abd al-Salam (aka Umar al-Qatari), a Jordanian with Qatari residence.[29] In 2011 and 2012, he worked with associates in Turkey, Syria, Lebanon, Qatar, and Iran to raise and move funds, transfer weapons, and facilitate travel for fighters. For example, in 2012, he gave thousands of dollars and material support to an al-Qaeda associate in Syria, intended to assist ANF operatives. That same year, he also assisted with ANF recruitment in Turkey. He has used online sites to raise funds for al-Qaeda, and in 2011 he was part of an attack against U.S. forces in Afghanistan.[30] In 2014, the State Department's Country Reports said that the Qatari government had deported a Jordanian terrorist financier living in Doha and employed by a Qatari charity.[31] The report did not name the Jordanian deported, but it may have been referring to Umar al-Qatari. If it was in fact him, it is possible he continued to engage in terrorist financing for at least two years after he was designated by Treasury.

Doha has been less than forthcoming on the issue of prosecuting terrorism financiers in Qatari courts. To be fair, the universe of deep pocket terrorist financiers in Qatar is a small one. According to the State Department's 2015 Country Reports, Doha had "made efforts to prosecute significant terrorist financiers."[32] As of 2016, Qatar had prosecuted five terrorist

---

[25] "Country Reports: Middle East and North Africa Overview," U.S. Department of State, 2014, https://www.state.gov/j/ct/rls/crt/2014/239407.htm.
[26] "Treasury Sanctions Prominent Al-Nusrah Front and Al-Qa'ida Facilitator," U.S. Department of the Treasury, March 14, 2017, https://www.treasury.gov/press-center/press-releases/Pages/sm0027.aspx
[27] "Treasury Designates Financial Supporters of Al-Qaida and Al-Nusrah Front," U.S. Department of the Treasury, August 5, 2015, https://www.treasury.gov/press-center/press-releases/Pages/jl0143.aspx.
[28] Ibid.
[29] "Treasury Designates Twelve Foreign Terrorist Fighter Facilitators," U.S. Department of the Treasury, https://www.treasury.gov/press-center/press-releases/Pages/jl2651.aspx.
[30] Ibid.
[31] "Country Reports: Middle East and North Africa Overview," U.S. Department of State, 2014, https://www.state.gov/j/ct/rls/crt/2014/239407.htm.
[32] "Country Reports: Middle East and North Africa Overview," U.S. Department of State, 2015, https://www.state.gov/j/ct/rls/crt/2015/257517.htm.

financiers: Ibrahim al-Bakr,[33] Saad al-Kaabi,[34] Abd al-Latif al-Kawari,[35] Abd al-Rahman al-Nuaymi,[36] and Khalifa al-Subaiy.[37] It is now clear that of these, two were acquitted, one was convicted but then acquitted on appeal, and one was convicted in absentia. As a result, none were in jail when the current intra-Gulf spat broke out, though the ones still resident in Qatar were reportedly under surveillance.

Despite shutting down Kaabi's fundraising platform in 2014, Qatar acquitted him in 2016, along with Nuaymi.[38] Both were designated by the Treasury for providing support to al-Qaeda.[39] According to his Treasury designation, Nuaymi ordered the transfer of almost $600,000 to al-Qaeda through one of the organization's representatives in Syria. He also assisted with the financing of al-Qaeda in Iraq and was the middle man between Qatari-based donors and the group.[40]

The three other individuals that Qatar prosecuted include Bakr, Kawari, and Subaiy. Bakr and Kawari were convicted in 2016, and Subaiy was convicted in 2008. This was the second time that Bakr was convicted, following his 2000 arrest in which he was subsequently "released from prison after he promised not to conduct terrorist activity in Qatar."[41] In his latest case, he was convicted in absentia and remains at large outside of Qatar. According to the 2008 Treasury designation, in 2006 Bakr assisted a terrorist cell that was plotting attacks against U.S. military bases in Qatar. Additionally, beginning in 2012, Bakr worked for al-Qaeda, serving as the link between Gulf-based al-Qaeda financiers and Afghanistan.[42]

Kawari, arrested in 2016 in Qatar and supposedly serving his sentence under house arrest, was designated in 2015 by the U.S. Treasury for coordinating the funding between Qatari financiers and al-Qaeda. He also served as an al-Qaeda security official.[43]

---

[33] "Treasury Designates Twelve Foreign Terrorist Fighter Facilitators," U.S. Department of the Treasury, September 24, 2014, https://www.treasury.gov/press-center/press-releases/Pages/jl2651.aspx.
[34] "Treasury Designates Financial Supporters of Al-Qaida and Al-Nusrah Front," U.S. Department of the Treasury, August 5, 2015, https://www.treasury.gov/press-center/press-releases/Pages/jl0143.aspx.
[35] Ibid.
[36] "Treasury Designates Al-Qa'ida Supporters in Qatar and Yemen," U.S. Department of the Treasury, December 18, 2013, https://www.treasury.gov/press-center/press-releases/Pages/jl2249.aspx.
[37] "Treasury Designates Gulf-Based al Qaida Financiers," U.S. Department of the Treasury, June 5, 2008, https://www.treasury.gov/press-center/press-releases/Pages/hp1011.aspx.
[38] "Counter Terrorism Designations," U.S. Department of the Treasury, August 5, 2015, https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20150805.aspx.
[39] "Treasury Designates Al-Qa'ida Supporters in Qatar and Yemen," U.S. Department of the Treasury, December 18, 2013, https://www.treasury.gov/press-center/press-releases/Pages/jl2249.aspx.
[40] Ibid.
[41] "Treasury Designates Twelve Foreign Terrorist Fighter Facilitators," U.S. Department of the Treasury, September 24, 2014, https://www.treasury.gov/press-center/press-releases/Pages/jl2651.aspx.
[42] Ibid.
[43] "Treasury Designates Financial Supporters of Al-Qaida and Al-Nusrah Front," U.S. Department of the Treasury, August 5, 2015, https://www.treasury.gov/press-center/press-releases/Pages/jl0143.aspx.

Lastly, Subaiy was originally arrested in January of 2008 in Bahrain for "financing terrorism, undergoing terrorist training, facilitating the travel of others abroad to receive terrorist training, and for membership in a terrorist organization."[44] He was arrested again in March 2008 by Qatar and served a six-month term in prison. He is supposedly under surveillance; however, in 2015 the UN Committee on al-Qaeda sanctions updated his listing with new information—which is no small matter because it required a new vote of the full UNSC—and reported that Subaiy had resumed terrorist activity. According to the committee, Subaiy reconnected with al-Qaeda financiers and facilitators in the Middle East after his release and resumed organizing funds in support of the organization. Moreover, "his involvement with Iran-based facilitators continued" in 2009, 2011, and 2012, with money flowing to al-Qaeda leaders in Pakistan.[45] If he is in fact under Qatari surveillance, the Qatari authorities do not appear to be very vigilant.

Systemic Reforms

Kuwait came late to counterterrorist financing: it did not pass its first terror financing law until 2013, after a long battle in the country's majlis, which counts among its elected representatives members of Kuwaiti Muslim Brotherhood and hardline Salafi Islamist parties. The law allows for asset freezing and creation of a financial intelligence unit, which was stood up not long after. Since then, Kuwait has implemented bylaws that mandate reporting suspicions of terrorist financing; it has also stood up an intergovernmental counterterrorism committee headed by the Ministry of Foreign Affairs to implement UN-level obligations and domestic regulations.[46]

Qatar took a number of systemic steps as well, including adopting new laws on charitable sector regulation and prohibitions on online fundraising in 2014.[47] In 2017, Qatar updated a 2004 counterterrorism law to allow the establishment of domestic terrorism designation capability. This deficiency had been among the concerns that kept Qatar on the Financial Action Task Force's ongoing monitoring list after its first mutual evaluation by the international standard setter in 2008.[48] Qatar was removed from the list in 2010 after enacting a

---

[44] "Treasury Designates Gulf-Based al Qaida Financiers," U.S. Department of the Treasury, June 5, 2008, https://www.treasury.gov/press-center/press-releases/Pages/hp1011.aspx.

[45] "Narrative Summaries of Reasons for Listing," United Nations, February 19, 2015, https://www.un.org/sc/suborg/en/sanctions/1267/aq_sanctions_list/summaries/individual/khalifa-muhammad-turki-al-subaiy.

[46] "Money Laundering and Financial Crimes Country Database," United States Department of State Bureau for International Narcotics and Law Enforcement Affairs. June 2015. Web. https://www.state.gov/documents/organization/239329.pdf

[47] United States. Cong. House. Committee on Foreign Affairs, Subcommittee on the Middle East and North Africa. Hearing on Assessing the U.S.-Qatar Relationship Jul. 26, 2017. 113th Cong. Washington: GPO, 2017 (statement of Dr. Matthew Levitt, Director and Fromer-Wexler Fellow, Stein Program on Counterterrorism and Intelligence, The Washington Institute for Near Easy Policy). https://docs.house.gov/meetings/FA/FA13/20170726/106329/HHRG-115-FA13-Wstate-LevittM-20170726.pdf

[48] "Mutual Evaluation Report of Qatar," Middle East and North Africa Financial Action Task Force, April 9, 2008. PDF. http://www.fatf-gafi.org/media/fatf/documents/reports/mer/MER%20Qatar.pdf

new AML/CFT law, issuing revised regulations and providing guidance on suspicious transaction monitoring requirements to obligated entities.[49] However, despite Qatar's efforts to implement the appropriate legal infrastructure, the State Department noted in its 2015 INCSR report: "The exploitation of charities and private donations to finance terrorism continues to be a concern, as does the ability of individuals to bypass the formal financial sector for illicit financing."[50]

Despite the above legislative efforts, according to former senior U.S. Treasury official Daniel Glaser, U.S.- and UN-designated terrorist financiers continue to operate "openly and notoriously" in Qatar.[51] In February 2017, Glaser lamented that Qatar had not yet made the kind of "fundamental decisions" on combating terror finance that would make the country a hostile environment for terror financiers, concluding that the positive steps Qatar had taken were "painfully slow."[52]

Since the beginning of the GCC rift, the United States has redoubled efforts to galvanize Qatari action on terror finance. In July 2017, the United States and Qatar signed a memorandum of understanding "outlining future efforts Qatar can take to fortify its fight against terrorism and actively address terrorism funding issues," according to a U.S. State Department official.[53] Although the contents of the MOU have not been made public, it is reported to focus on increased information sharing and capacity building related to prosecutions. On the terror finance side, in a statement following his October 2017 visit to Doha, Treasury Secretary Mnuchin enumerated additional areas of cooperation, including: "placing a greater emphasis on charitable and money service business sectors in Qatar to prevent terrorists from continuing to use those sectors for illicit financing purposes, developing a Qatari domestic designations regime in line with international standards, and taking joint actions against terrorist financiers."[54]

Mnuchin's visit came days after Qatar had joined the United States and other GCC states in their first joint designation under the TFTC. Among those targeted was one individual with significant ties to Qatar: Yemeni Abd al-Wahab al-Humayqani. He was previously designated by the United States in 2013. According to the Treasury, in 2012, Abd al-Rahman al-

---

[49] "Improving Global AML/CFT Compliance: update on-going process – June 2010," Financial Action Task Force, June 25, 2010. http://www.fatf-gafi.org/countries/d-i/greece/documents/improving-globalamlcftcomplianceupdateon-goingprocess-june2010.html
[50] "Money Laundering and Financial Crimes Country Database," United States Department of State Bureau for International Narcotics and Law Enforcement Affairs. June 2015. Web. p 363. https://www.state.gov/documents/organization/239329.pdf
[51] Daniel Glaser, Foundation for Defense of Democracies, February 7, 2017, https://www.youtube.com/watch?v=OXSMKYr-SFI&feature=youtu.be&t=34m18s.
[52] Ibid.
[53] "U.S., Qatar sign MOI on combatting terrorism, financing," Reuters, July 11, 2017. https://www.reuters.com/article/us-gulf-qatar-usa-mou/u-s-qatar-sign-mou-on-combatting-terrorism-financing-idUSKBN19W1JX.
[54] "Joint Statement Following U.S. Treasury Secretary Steven Mnuchin's Meetings with His Highness Shiekh Tamin bin Hamad Al Thani, Emir of Qatar, and Qatari Officials," Press Center, U.S. Department of the Treasury, October 20, 2017. https://www.treasury.gov/press-center/press-releases/Pages/sm0196.aspx.

Nuaymi provided financial support to a charity headed by Humayqani.[55] Humayqani was also named in the list promulgated by the UAE, Saudi Arabia, Bahrain, and Egypt in May 2017. According to the Emirati information, Humayqani had previously worked for Qatar's Ministry of Endowments.[56] Considering that Qatar has previously rejected the Arab Quartet list "as baseless allegations that hold no foundation in fact,"[57] just the recognition alongside its GCC neighbors of Humayqani's role in terrorist financing and others represents a significant step.

In March, Qatar released its first national terrorist list, based on capabilities it gained when it bolstered its terror finance law in summer 2017.[58] The list named twenty individuals and eight entities, including a number of Qatari nationals already designated by the UN, United States, and Arab Quartet.[59] The list did not include many of those on the boycotting nations' list of eighty-one issued in June 2017. Nonetheless, it represents a significant step by Qatar in line with its commitments made to the United States as part of an MOU signed in July 2017 and through its involvement in the TFTC, as Qatar claimed in its official announcement. The announcement also noted Qatar's commitment to implementing UN obligations since the establishment of its National Counter-Terrorism Committee in 2007.[60] However, markedly absent from the list was UN-designated Khalifa al-Subaiy, who after being sanctioned in 2008 remained an active facilitator for al-Qaeda as of 2015, according to the UN.

Qatari officials continue to demonstrate a tone deafness on these issues: just two days after Emir Tamim bin Hamad al-Thani met with President Trump in Washington and promised that Qatar "will not tolerate people who fund terrorism,"[61] his prime minister attended the wedding of the son of UN-, U.S.-, and Qatari-designated terrorist financier Nuaymi.[62] (Another notable guest was former Hamas leader Khaled Meshaal.) It is worth noting that

---

[55] "Treasury Designates Al-Qa'ida Supporters in Qatar and Yemen," Press Center, U.S. Department of the Treasury, December 18, 2013. https://www.treasury.gov/press-center/press-releases/Pages/jl2249.aspx.

[56] "43 new designations specifically address threats posed by Qatar linked and based Al Qaida Terrorism Support Networks," Emirates New Agency (WAM), June 9, 2017. http://wam.ae/en/details/1395302618259.

[57] Associated Press, "Arab nations add names to terror list amid Qatar dispute," YNet News, Jun. 9, 2017. Web. https://www.ynetnews.com/articles/0,7340,L-4973564,00.html

[58] "Qatar publishes National List of Terrorist Classification," The Peninsula, March 24, 2018. https://thepeninsulaqatar.com/article/24/03/2018/Qatar-publishes-National-List-of-Terrorist-Classification

[59] "Qatar puts 28 people and entities on new terrorism list," Reuters, March 22, 2018. https://www.reuters.com/article/us-gulf-qatar-security/qatar-puts-28-people-and-entities-on-new-terrorism-list-idUSKBN1GY222

[60] "Statement by the Qatar National Counter-Terrorism Committee on the Issuance of National Lists of Terrorist Classifications," Qatar Tribune, March 23, 2018. http://www.qatar-tribune.com/Latest-News/ArtMID/423/ArticleID/17882

[61] "Remarks by President Trump and Qatar Amir Tamim bin Hamad al Thani of the State of Qatar before bilateral meeting," White House, April 10, 2018. https://www.whitehouse.gov/briefings-statements/remarks-president-trump-amir-tamim-bin-hamad-al-thani-state-qatar-bilateral-meeting/

[62] "Al-Arabiya expose sheds light on Qatar regime's open ties with terror financiers," Al-Arabiya, April 17, 2018. https://english.alarabiya.net/en/News/gulf/2018/04/17/Al-Arabiya-expose-sheds-light-on-Qatar-regime-s-open-ties-with-terror-financiers.html

Nuaymi was reportedly acquitted of terror finance charges in Qatari courts prior to his inclusion on the country's inaugural national terrorist list. Such a designation even by the UN, which includes an asset freeze and travel ban, would not prohibit Nuaymi from attending his son's wedding. However, Nuaymi had been subject to pretrial detention for several months, pending a government appeal in his case, which appears to be stalled. A statement released by the Qatari government said that Nuaymi was released in March. It also confirmed that the prime minster had attended the event at the invitation of the groom, who it described as "a government employee of the state of Qatar, and an upstanding young man," adding that the prime minister would not "avoid a family affair because a defendant standing trial may possibly be in attendance."[63]

EVOLUTION OF THE TERROR FINANCE THREAT

The nature of the terrorist threat is that it will continue to evolve and develop ways to finance and otherwise resource themselves, and our responses must also be geared to these evolving threats. Since 9/11, as a result of efforts to detect, disrupt, and dissuade donors from contributing to terrorist organizations, as well as improved oversight of charitable organizations that are often used as cover to move funds, terrorist organizations increasingly sought more diverse sources of funding. The proliferation of un- and under-governed spaces also made it easier for groups to raise funds locally through extortion and taxation, as well as kidnapping for ransom and other criminal activity.

Al-Qaeda

With the beginning of the conflict in Syria, there was a resurgence of traditional means of funding, especially from the Gulf. Fundraisers and facilitators in the Gulf have long supported AQ core as well as its affiliates in Iraq and more recently Syria, including by facilitating the movement of people and funds from Southeast Asia to the Levant. U.S.- and UN-designated Qatari Ibrahim al-Bakr, for example, served as a link between Gulf-based AQ financiers and Afghanistan. Kuwaiti Muhsin al-Fadhli was sanctioned in 2005 for financing aspects of the Iraqi insurgency, including "the Zarqawi Network" and al-Qaeda. In 2012, as part of a Justice Department "Rewards for Justice" announcement, U.S. officials detailed Fadhli's role as AQ's senior facilitator in Iran, leading a network that the State Department described as "a core facilitation pipeline through Iran, enabling AQ to move funds and fighters to South Asia and to Syria."[64]

---

[63] Edward Malnick. "Qatar PM went to wedding hosted by 'one of the world's most prolific terrorist financiers," The Telegraph, March 21, 2018. https://www.telegraph.co.uk/news/2018/04/21/qatar-pm-went-wedding-hosted-one-worlds-prolific-terror-financiers/

[64] Muhsin al Fadhli was killed by a U.S. airstrike in Syria on July 8, 2015, where he was reportedly leading a group of seasoned al-Qaida operatives working with al Nusrah Front in hopes of recruiting Europeans and Americans to conduct attacks in the West. (Schmitt, Eric. 2015. "Leader of Qaeda Cell in Syria, Muhsin al-Fadhli, is Killed in Airstrike, U.S. Says," *The New York Times,* July 21, https://www.nytimes.com/2015/07/22/world/middleeast/leader-of-qaeda-cell-in-syria-muhsin-al-fadhli-is-killed-in-airstrike-us-says.html?_r=0.)

While most AQ affiliates have diversified their methods of fundraising[65] away from foreign sources, al-Qaeda in Syria had been the major exception. As of 2014, AQ in Syria may have received as much as few million dollars a year from private donors in the Gulf.[66] According to a 2016 UN Security Council report, the group has continued to derive its income "mainly from external donations," along with criminal sources of funding such as kidnapping for ransom, extortion, and war spoils.[67]

Some of this fundraising went on in plain sight on online platforms such as social media. Hajjaj al-Ajmi, a Kuwaiti who was sanctioned by the UN in 2014, used Twitter to solicit donations for AQ in Syria.[68] Ajmi and others, such as Qatari national Saad al-Kaabi, who posted solicitations on Facebook and WhatsApp accounts for "arming, feeding, and treating" fighters in Syria, openly crowd-sourced donations for AQ and other jihadist groups in Syria.[69] Fundraisers have also used social media to thank and confirm to donors the delivery of funds and material support to jihadist groups. In a video uploaded to YouTube in October 2016, U.S.-designated AQ in Syria financier and Saudi national Abd Allah al-Muhaysini thanked Gulf donors for supporting jihadists in Syria: "As for the businessmen, and I will mention some of them, the ones who prepared these hundred rockets, may Allah reward them. One hundred Elephant rockets…some from a group of brothers in Islam from al-Riyadh, some from our brother Abu Ahmed from Kuwait, some from our brother Abu al-Joud from Qatar, and some from some brothers I have not mentioned…I tell all the businessmen of the Muslims, this is your money now, fighting in the path of Allah."[70] According to the U.S. Treasury, between 2013 and 2015, Muhaysini raised millions of dollars for AQ in Syria, claiming himself that he had secured $5 million in donations to arm fighters.[71]

---

[65] Levitt, Matthew & Bauer, Katherine, "Qatar Doesn't Need a Blockade. It Needs an Audit," Foreign Policy. June 15, 2017. Web. https://foreignpolicy.com/2017/06/15/qatar-doesnt-need-a-blockade-it-needs-an-audit-al-qaeda/

[66] "Remarks of Under Secretary for Terrorism and Financial Intelligence David Cohen before the Center for a New American Security on 'Confronting New Threats in Terrorist Financing," Press Center, U.S. Department of the Treasury, 03 April 2014. Web. https://www.treasury.gov/press-center/press-releases/Pages/jl2308.aspx

[67] "Nineteenth Report of the Analytical Support and Sanctions Monitoring Team submitted pursuant to resolution 2253(2015) concerning ISIL (Da'esh), Al-Qaida and associated individuals and entities," United Nations Security Council, December 30, 2016. http://www.un.org/en/ga/search/view_doc.asp?symbol=S/2017/35

[68] "Narrative Summaries of Reasons for Listing: Hajjaj bin Fahd al Ajmi," United Nations, August 15, 2014 (updated December 11, 2017). https://www.un.org/sc/suborg/en/sanctions/1267/aq_sanctions_list/summaries/individual/hajjaj-bin-fahd-al-ajmi

[69] Erin Burnett. "Are Terrorists Raising Money in Qatar?" CNN. https://www.un.org/sc/suborg/en/sanctions/1267/aq_sanctions_list/summaries/individual/hajjaj-bin-fahd-al-ajmi

[70] al-Muhaysini, Abdullah. "Sheikh al-Muhaysini Announces Beginning of Breaking Siege of Aleppo and Fires 100 Elephant Rockets". YouTube video, 12:02. Posted October 2016, since removed date unknown. See Zelin, Aaron Y, "Policy Focus 153:How Al-Qaeda Survived Drones, Uprisings, and the Islamic State: The Nature of the Current Treat," The Washington Institute for Near East Policy, June 2017. PDF. http://www.washingtoninstitute.org/uploads/Documents/pubs/PolicyFocus153-Zelin.pdf

[71] "Treasury Designates Key al-Nusrah Front Leaders," Press Center, U.S. Department of the Treasury, November 10, 2016. https://www.treasury.gov/press-center/press-releases/Pages/jl0605.aspx

As the conflict in Syria has continued, however, al-Qaeda's Syrian affiliate, al-Nusra Front (ANF), has become increasingly entrenched in Syria's Idlib Province, participating in governance, controlling territory and taking or sharing resources with other extremist groups present there. According to the UN monitoring team's most recent report, published in February 2018, ANF now appears to be "largely self-sufficient." That ANF is no longer reliant on foreign sources does not necessarily mean that the group no long receives such support. However, it does likely mean that even if we are able to disrupt financing from foreign sources such as those in the Gulf, that alone will not bankrupt the group. What is needed is a multi-faceted approach. Disrupting foreign donations to terrorist groups alone will not solve the problem.

Islamic State

Foreign donations consistently made up only a small share of ISIS funding, especially after the group took over vast swaths of territory in Syria and Iraq in the spring and summer of 2014.[72] The same year, the organization's budget was estimated to be close to $2 billion, derived primarily from the resources and people in the territory it controlled. ISIS did not develop this expertise overnight. For more than a decade, its predecessors al-Qaeda in Iraq and the Islamic State in Iraq acted under the strategic decision to derive revenues locally to avoid foreign dependence and direction.[73]

Alongside efforts to isolate ISIS from the global financial system and cut off its access to locally-derived revenue, the United States acted to expose ISIS funders in the Gulf and elsewhere, as well as to share information related to ISIS fundraising bilaterally and under the auspices of the Counter ISIL Finance Group (CIFG), a subgroup of the Global Coalition to Defeat ISIS, founded in March 2015 and co-chaired by the United States, Italy, and Saudi Arabia.[74]

---

[72] "Islamic State and the crisis in Iraq and Syria in maps," BBC News, last updated March 28, 2018. Web. http://www.bbc.com/news/world-middle-east-27838034; "Assessment by the Analytical Support and Sanctions Monitoring Team of the impact of the measures imposed in Security Council resolution 2199 (2015), pursuant to paragraph 30 of the resolution: Chair's summary," United Nations Security Council, September 25, 2015. PDF. https://www.un.org/en/ga/search/view_doc.asp?symbol=S/2015/739

[73] "Foundations of the Islamic State: Management, Money and Terror in Iraq, 2005-2010," Patrick B. Johnston, et al, Rand Corporation, 2016. https://www.rand.org/pubs/research_reports/RR1192.html

[74] "Establishment of the Counter ISIL Finance Group in Rome, Italy," Press Center, U.S. Department of Treasury, March 20, 2015. https://www.treasury.gov/press-center/press-releases/Pages/jl10004.aspx

Gulf states have universally responded to the threat of ISIS financing, as most have faced domestic threats from the group as well. Most have prosecuted ISIS supporters and financiers.[75] All of the Gulf states also signed on to the first joint action of the TFTC, which targeted a number of ISIS financiers in Yemen.[76]

KEY ISSUES TO ADDRESS GOING FORWARD

Using the TFTC Effectively

When the TFTC was announced during Trump's visit to Riyadh in May 2017, it was not the first time the idea of establishing a multilateral body in the Gulf to address terrorist financing had been considered.[77] In both concept and implementation, the TFTC faces a number of challenges, such as the difficulty in sharing robust, actionable intelligence in a multilateral setting, and the differing interests of the member states across a wide scope of targets – Shia and Sunni – under consideration. However, given the events following the Riyadh Summit, the TFTC may have a second life as it offers the opportunity for joint action among arguing neighbors and dialogue to address some of the underlying grievances of the dispute. The TFTC has issued its inaugural set of designations in October 2017 and all members have attended at least one meeting.[78] These are no small feats. However, officials should be careful to not let the desire to use the TFTC as a bridge for the GCC states' differences in the exclusion of bilateral or even unilateral action.

Exchange Houses

As it has become harder for illicit actors to exploit the financial sector, they have turned to informal methods such as money exchanges houses, hawalas and new payment methods. In a recent report on emerging terrorist financing typologies, the intergovernmental Financial Action Task Force highlighted the vulnerability of exchange companies and other remitters to terrorist financing where they are not regulated.[79]

---

[75] Lori Plotkin Boghardt. "Policywatch 2773: Gulf Support to the Counter-ISIS Campaign," Washington Institute for Near East Policy, March 21, 2017. http://www.washingtoninstitute.org/policy-analysis/view/gulf-support-to-the-counter-isis-campaign

[76] "Treasury and Terrorist Financing Targeting Center Partners Issue First Joint Sanctions Against Key Terrorist and Supporters," Press Center, U.S. Department of the Treasury, October 25, 2017. https://www.treasury.gov/press-center/press-releases/Pages/sm0187.aspx

[77] Levitt, Matthew, "Policywatch 2881: How a New Initiative Could Pave the Way to Gulf Reconciliation," The Washington Institute For Near East Policy, Oct. 30, 2017. Web. http://www.washingtoninstitute.org/policy-analysis/view/how-the-tftc-could-pave-the-way-to-gulf-reconciliation

[78] "Meeting of the Terrorist Financing Targeting Center Member States Convenes in Kuwait," U.S. Department of State, Mar. 6, 2018. Web. https://translations.state.gov/2018/03/06/meeting-of-the-terrorist-financing-targeting-center-member-states-convenes-in-kuwait/

[79] "FATF Report: Emerging Terrorist Financing Risks," Financial Action Task Force, October, 2015. http://www.fatf-gafi.org/media/fatf/documents/reports/Emerging-Terrorist-Financing-Risks.pdf

This trend has posed a particular threat across the GCC given its large expatriate population and sizeable remittance flows. But nowhere more so than the UAE, with its large number of exchange houses, general trading companies and hawalas.

Over the past few years, the UAE has taken a number of joint actions with the United States against exchange houses involved in illicit activity, including closing Al Zarooni Exchange, which the United States tied to a global money laundering organization[80] and cutting off a Yemen-based exchange house that was providing financial services to Al Qaeda in the Arabian Peninsula (AQAP). [81]

In late March 2018, the UAE also promulgated new exchange house regulations aiming to raise industry standards. The rules include requiring exchange houses to appoint a compliance officer and shore up customer identification requirements. They also put in place restrictions on trade-related and charitable transactions – two areas that have proven to be vulnerabilities to illicit finance in the past. In 2014, the Central Bank of the UAE had increased capital requirements for exchange houses in their jurisdiction, hoping to spur consolidation in the sector and ease the regulatory burden.[82] There are signs that the CBUAE has also improved cooperation with company registrars, an important step in identifying and acting against unregistered money service businesses.[83]

Other GCC states have committed to shoring up exchange house regulation. In September 2017, the Saudi Arabian Monetary Authority (SAMA), the kingdom's central bank, suspended the operations of three of the country's four exchange houses licensed to make cross-border payments due to regulatory breaches.[84] Qatar has also committed to address vulnerabilities related to its exchange house sector as an area of cooperation announced by Secretary Mnuchin.

Deploying Targeted Financial Measures

Amid the Arab Spring, Gulf states began to see the value of having the sanctions tool in their national security tool kit more acutely. In 2011, the Arab League adopted sanctions against

---

[80] "Treasury Sanctions The Khanani Money Laundering Organization," Press Center, U.S. Departmeny of the Treasury, November 12, 2015. Web. https://www.treasury.gov/press-center/press-releases/Pages/jl0265.aspx

[81] "Treasury Designated Financial Supporters of Al Qaida in the Arabian Peninsula," Press Center, U.S. Department of Treasury, November 1, 2016. https://www.treasury.gov/press-center/press-releases/Pages/jl0601.aspx

[82] Tom Arnold. "UAE money exchange houses ordered to raise standards by regulators," Reuters, March 29, 2018. https://www.reuters.com/article/emirates-regulations/uae-money-exchange-houses-ordered-to-raise-standards-by-regulator-idUSL8N1RA2EC

[83] "UAE Central Bank orders closure of money exchange," Gulf News, May 30, 2017. https://gulfnews.com/news/uae/crime/uae-central-bank-orders-closure-of-money-exchange-1.2035736

[84] "Saudi Central Bank cracks down on exchange bureaus," Arabian Business, September 26, 2017. http://www.arabianbusiness.com/industries/banking-finance/379524-saudi-central-bank-cracks-down-on-exchange-bureaus

Syrian president Bashar al-Assad[85], and in 2016, the GCC designated Hezbollah as a terrorist organization.[86] Around the same time, the UAE adopted its own national lists of designated terrorist organizations and individual supporters.[87]

This shift reflected a number of dynamics in the region at the time. These included perceived domestic threats by Gulf states during the Arab Spring, increasing concern among the Sunni-ruled states about the expansion of Iranian influence, as well as U.S. pressure and designations targeting those in their jurisdictions.

Dynamics in the financial system were also changing—both in the region and globally. That is, the trend of so-called "de-risking," in which global banks have pulled out of what they perceive as high-risk jurisdictions or lines of business, has been in part a reaction to large fines brought against global banks for violations of U.S. sanctions. As such, the onus was placed on financial institutions in the Gulf, among a number of other regions globally, to demonstrate that they took combatting financial crimes seriously. Upward pressure from banks on regulators met with downward pressure from security-minded leaders in the Gulf resulting in a number of Gulf states taking ownership of counter-illicit finance issues in a way they had not previously.

As Gulf states increasingly develop and implement their own domestic targeted financial sanctions capability, it will be important to press them to meet relevant FATF standards, especially those that relate to transparency and due process. Designation lists should be public, include a statement of the case, be based on an evidentiary standard of proof of "reasonable grounds," and include delisting procedures. According to guidance issued by the FATF: "In determining the limits of, or fostering widespread support for, an effective counter-terrorist financing regime, countries must also respect human rights, respect the rule of law, and recognize the rights of innocent third parties."[88]

---

[85] Bakri, Nada & MacFarquhar, Neil, "Isolating Syria, Arab League Imposes Broad Sanctions," The New York Times, Nov. 27, 2011. Web. https://www.nytimes.com/2011/11/28/world/middleeast/arab-league-prepares-to-vote-on-syrian-sanctions.html

[86] Ballout, Dana & Fitch, Asa, "Gulf Cooperation Council Labels Hezbollah a Terrorist Group," Wall Street Journal, Mar. 2, 2016. Web. https://www.wsj.com/articles/gulf-cooperation-council-labels-hezbollah-a-terrorist-group-1456926654

[87] "UAE publishes list of terrorist organisations," Gulf News, Nov. 15, 2014. Web. https://gulfnews.com/news/uae/government/uae-publishes-list-of-terrorist-organisations-1.1412895

[88] "International Best Practices: Targeted Financial Sanctions Related to Terrorism and Terrorist Financing (Recommendation 6)," Financial Action Task Force, June 2013, p. 4. PDF. http://www.fatf-gafi.org/media/fatf/documents/recommendations/BPP-Fin-Sanctions-TF-R6.pdf