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GROUP

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SANCTIONS INTELLIGENCE UPDATE

SOCIAL MEDIA & ILLICIT FINANCE:
A LOOK AT THE CONFLICT IN SYRIA



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OVERVIEW

Financial facilitators are increasing their use of social media platforms such as Twitter and Facebook to raise funds for designated terrorist organizations and other militant groups operating in conflict zones. Financial institutions should consider whether their financial intelligence and analytical capabilities are fashioned to effectively monitor social media for data relevant to AML/CFT risk management.

The conflict in Syria serves as an interesting case in point. On August 6, the Treasury Department designated two Kuwait-based individuals – **Hajjaj al-Ajmi** and **Shafi al-Ajmi** – for providing material support to **al Qaida’s al Nusra Front** in Syria through the use of social media-based fundraising campaigns and financial networks.

In March, the US Treasury Department pointed to the use of social media by terrorist financiers to solicit donations for Syria. The warning identified Kuwait and Qatar as “permissive jurisdictions” for extremist fundraising.

In many cases, social media-disseminated fundraising materials instruct supporters to transfer funds to accounts at regional banks that, in turn, maintain international correspondent relationships.



PRIVATE FUNDRAISING FOR MILITANT GROUPS IN SYRIA

A review of social media campaigns led by designated terrorist financiers and other identified **al Qaida** supporters demonstrates with specificity the financial activity at issue.

In these social media-based campaigns, fundraising appeals advertise their support for militant opposition groups in the Syrian conflict. The solicitations identify the leaders who organize and endorse the effort, and in many cases include details on the use of proceeds such as purchasing arms or training fighters.

A Kuwait-based campaign to support 12,000 fighters in Syria reportedly raised several million dollars, purchased anti-aircraft missiles, grenades, and RPGs, and was planning to acquire heat-seeking and guided missiles. Members of the campaign supported militant groups including US-blacklisted **Jabhat al-Nusra**.

A number of fundraising appeals provide bank transfer instructions identifying the banks and account numbers accepting donations on behalf of the campaigns.

In late 2013, one Qatar-based campaign circulated solicitations on Twitter that called for donations to “arm the mujahideen.” The solicitation included contact names and phone numbers, and wire transfer instructions for international transfers. Around the same time frame, **al Qaida’s** Syrian affiliate **Jabhat al-Nusra** used social media to instruct donors to contribute to the same campaign, or **Hajjaj al-Ajmi** in Kuwait. **Hajjaj al-Ajmi** was subsequently designated by the US Treasury Department on August 6, 2014 for supporting **Jabhat al-Nusra**.

Another Kuwait-based solicitation for militant groups in Syria advertises **Shafi al-Ajmi** as a campaign leader. The campaign flyer includes wire transfer instructions with bank account details for interested donors. **Shafi al-Ajmi** was later designated by the US Treasury



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Campaign solicitation on Twitter.



Wire transfer instructions for donors.



Confirmation of large contributions (\$170,000).

Department on August 6, 2014 for supporting **Jabhat al-Nusra**.

Shafi al-Ajmi and other associates also appear on a solicitation led by a Turkey-based charity, which included wire transfer instructions.

In 2013, the New York Times described the leader of the "Wage Jihad With Your Money" campaign

Campaign flyer promoted on social media, soliciting donations for anti-aircraft artillery, mortars, and bullets.

In some cases, international donors were provided bank accounts held under the names of private individuals to use for single transfers only. For repeat transfers, donors were instructed to contact the facilitators again for new accounts.

Facilitators and militias also utilize social media platforms to express gratitude for donations and highlight the use of the funds.

- In June 2014, a facilitator posted a video from an **al Qaida**-affiliated militia showing that funds were used to produce bombs.
- In August 2013, a campaign posted a video from a militia demonstrating that funds were used to purchase anti-aircraft artillery.

المادة	ريال سعودي	دينار كويتي	الاسم
وقف شراء مضادات الطيران	2600	200	الماضي
8 قذائف هاون	1300	100	النهدي
150 طلقة كلاش	650	50	الرحيمي
50 طلقة قناص			

as "close to **al Qaida**." The campaign took credit for attacks that included **al Qaida's Jabhat al-Nusra**.

Rather than posting bank account details on its fundraising solicitation, this campaign published contact phone numbers only. Via WhatsApp, facilitators provided donors with detailed instructions to transfer funds through bank accounts in the Gulf or through specified money transfer services.

The Camstoll Group advises on sanctions, illicit finance, national security, and regulatory matters. Our research intensive approach for financial institutions, multinationals and governments is designed to generate insights and options for complex policy, regulatory or competitive challenges

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In February 2013, a coalition of Syrian opposition groups that supported the Free Syrian Army posted an image on Facebook of rockets decorated with its logo. One-year prior, the group solicited funds from US-based donors, including through Facebook and Twitter. The postings identified an organization and bank account in the US to receive contributions on its behalf.

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