

Congressional Testimony

Grading Counterterrorism Cooperation with the G.C.C. States

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*Working to stop the defamation of the
Jewish people and to secure justice and
fair treatment for all since 1913*

Chairmen Poe and Ros-Lehtinen, Ranking Members Keating and Deutch, and distinguished Members of the Subcommittees: thank you on behalf of the Anti-Defamation League for the opportunity to testify before you again on Gulf counterterrorism cooperation. As a former staffer for this Committee, I particularly appreciate the chance to discuss this important topic with you here today.

The Anti-Defamation League was founded in 1913 “to stop the defamation of the Jewish people and to secure fair treatment for all.” Today, a major component of that mission involves monitoring extremism across the ideological spectrum, tracking incitement and terrorism trends both at home and abroad. As we have learned, where anti-Semitism flourishes, no society is safe from extremism.

Part I. General Overview

In many ways, the Arab Gulf monarchies are on the front lines in the fight against terrorism. Saudi Arabia previously faced down a sustained al-Qaeda insurgency within its borders, and the other four Sunni-ruled Gulf monarchies have similarly been the target of significant terrorist plots. Thousands of Saudi citizens have gone to fight for extremists in Syria, and hundreds have returned.¹ With Iraq to the north, Yemen to the south, and Iran just across the pond, the threats posed by terrorism to the six monarchies of the Gulf Cooperation Council (G.C.C.) are all too real.

Because this region is of especially paramount importance for the fight against terrorist finance, I will be focusing the bulk of my testimony on that issue. This includes the related question of how well the various G.C.C. states are doing at acknowledging the threat posed by specific terrorist groups and designating them as such, for the purposes of financial and other countermeasures.

However, before exploring this topic, it is important to note the relevance of the G.C.C. states for several other dimensions of U.S. efforts against terrorism. First, all of the Gulf monarchies have opened up their territory to U.S. military bases that are central to our efforts against terrorism. Second, several the Gulf monarchies have had a significant impact through their foreign policies on terrorism trends in Mideast conflict zones, such as in Yemen and Syria. Third, the Gulf monarchies have had a problematic, mixed record regarding ideological incitement, which has fed radicalism and enabled recruiting by terrorist groups in the region and beyond.

1. American Bases:

¹ Richard Barrett, *Beyond the Caliphate: Foreign Fighters and the Threat of Returnees*, Soufan Group, October 2017, page 13. (<http://thesoufancenter.org/wp-content/uploads/2017/11/Beyond-the-Caliphate-Foreign-Fighters-and-the-Threat-of-Returnees-TSC-Report-October-2017-v3.pdf>)

As of 2014, the U.S. had 35,000 military personnel at over a dozen bases in the Gulf.² Kuwait served as a major stopping point for U.S. forces moving in and out of Iraq during the height of Operation Iraqi Freedom.³ Qatar hosts America's Combined Air and Space Operations Center that coordinates U.S. air operations throughout the broader Middle East. Bahrain hosts America's main naval base in the region, and the U.A.E.'s harbor at Jebel Ali is the U.S. Navy's busiest foreign port of call.⁴

These bases serve an important function for U.S. counterterrorism operations, but the fact that the Combined Air and Space Operations Center was moved from Saudi Arabia to Qatar in 2003 is a reminder that sometimes other security priorities may override this benefit.⁵ Indeed, critics of Qatari or Bahraini policies have called for contingency planning to explore the possibility of moving those bases.⁶

2. Foreign Policies toward Conflict Zones:

After Iranian-backed Houthi extremists overthrew the legitimately elected government of Yemen, Saudi Arabia assembled a coalition including all of the other G.C.C. states to intervene militarily in Yemen against the rebels. Many of these governments characterize the Houthis as a terrorist group, and the insurgents have launched repeated missile attacks against civilian areas in Saudi Arabia, including as deep into the kingdom as Riyadh. Saudi-led forces have been criticized for civilian casualties from poorly targeted airstrikes, as well as for exacerbating Yemen's humanitarian crisis by strictly stalling imports to inspect for smuggled Iranian arms.

Al-Qaeda capitalized on the resulting chaos in Yemen, including by conquering and enriching itself off of the Yemeni port city of al-Mukalla.⁷ After a delay of roughly a year, Saudi Arabia did eventually launch airstrikes in Yemen against al-Qaeda,⁸ and

² William J. Burns, "A Renewed Agenda for U.S.-Gulf Partnership," February 19, 2014. (<https://2009-2017.state.gov/s/d/former/burns/remarks/2014/221809.htm>)

³ Kenneth Katzman, *Kuwait: Governance, Security, and Policy*, Congressional Research Service, February 6, 2018, page 11. (<https://fas.org/sgp/crs/mideast/RS21513.pdf>)

⁴ Rajiv Chandrasekaran, "In the UAE, the United States has a Quiet, Potent Ally Nicknamed 'Little Sparta'," *Washington Post*, November 9, 2014. (https://www.washingtonpost.com/world/national-security/in-the-uae-the-united-states-has-a-quiet-potent-ally-nicknamed-little-sparta/2014/11/08/3fc6a50c-643a-11e4-836c-83bc4f26eb67_story.html?utm_term=.b9ce37f51ea7)

⁵ Jim Garamone, "Saudi Base to Close, Ops Center Moves to Qatar," *American Forces Press Service*, April 29, 2003. (<http://archive.defense.gov/news/newsarticle.aspx?id=29047>)

⁶ Cole Bockenfeld, "Human Rights in Bahrain: Next Steps," *Testimony before the Tom Lantos Human Rights Commission*, September 9, 2016. (https://humanrightscommission.house.gov/sites/humanrightscommission.house.gov/files/documents/Bockenfeld%20-%20TLHRC%20Bahrain%20Testimony_0.pdf); Charles Wald and Michael Makovsky, "The Two Faces of Qatar, a Dubious Mideast Ally," *Wall Street Journal*, April 24, 2017. (<https://www.wsj.com/articles/the-two-faces-of-qatar-a-dubious-mideast-ally-1493075654>)

⁷ Yara Bayoumi, Noah Browning, and Mohammed Ghobari, "How Saudi Arabia's War in Yemen Has Made al Qaeda Stronger – and Richer," *Reuters*, April 8, 2016. (<https://www.reuters.com/investigates/special-report/yemen-aqap/>)

⁸ Akbar Shahid Ahmed, "Saudis Try to Sell Washington on Controversial Obama-Backed War in Yemen," *Huffington Post*, February 8, 2016. (https://www.huffingtonpost.com/entry/saudi-arabia-defend-yemen_us_56b9163de4b08069c7a87da0)

the United Arab Emirates led a Yemeni ground campaign in 2016 with limited U.S. support that retook al-Mukalla from terrorists.⁹ In 2017, all six G.C.C. states recently joined with the U.S. in a historic joint designation of terrorist finance targets in Yemen linked to al-Qaeda or the Islamic State.¹⁰ However, more sustainable and effective efforts to combat al-Qaeda's dangerous Yemeni branch depend upon the resolution of Yemen's war and the establishment of some central authority there.

In Syria, several of the Gulf monarchies played a dangerous game, backing jihadist insurgents in hopes they would be the most effective fighting force against Damascus's Assad regime. However, that strategy backfired, alienating Western support for the increasingly radicalized rebel forces and contributing to the rebellion's apparent failure, as well as feeding the global terrorist threat. Several Gulf monarchies did participate in the U.S.-led airstrikes in Syria that started in 2014 against I.S., but those contributions fell off after the G.C.C. shifted its focus to Yemen.

In Iraq, the G.C.C. states are finally coming around to the importance of investing in a relationship with Baghdad. By opening new diplomatic facilities, engaging Iraqi officials, and supporting reconstruction in newly-liberated Sunni areas of Iraq, the Gulf monarchies hope to create a bulwark in Iraq against both Iranian hegemony and a resurgence of the Islamic State.¹¹

In Libya, division among the Gulf states has unfortunately contributed to that country's fragmentation. After an electoral outcome in 2014 that Islamists did not like, Qatar and Turkey backed an Islamist-oriented claimant government in Libya's west, while the United Arab Emirates, Egypt, and Saudi Arabia supported the more secular, elected government in Libya's east. The resulting vacuum allowed the Islamic State to capture significant territory in Libya, which was only rolled back thanks to Western military intervention and an uneasy Gulf state détente.

Although most of the Gulf monarchies have sought to bolster Mahmoud Abbas's Palestinian Authority in the West Bank, Qatar has instead supported the Hamas regime in Gaza.¹² As I argue below, there is much more the G.C.C. states can do to help the U.S. and Israel combat Palestinian terrorist groups such as Hamas.

3. Gulf Incitement:

⁹ Kristina Wong, "Pentagon Reveals US Forces in Yemen," *The Hill*, May 6, 2016.

(<http://thehill.com/policy/defense/279045-pentagon-says-us-forces-are-helping-fight-al-qaeda-in-yemen>)

¹⁰ U.S. Treasury Department, "Treasury and Terrorist Financing Targeting Center Partners Issue First Joint Sanctions against Key Terrorists and Supporters," October 25, 2017. (<https://www.treasury.gov/press-center/press-releases/Pages/sm0187.aspx>)

¹¹ See, for example, Hussein Ibish, *The Power of Positive Diplomacy: Saudi Outreach in Iraq since 2014*, the Arab Gulf States Institute in Washington, April 19, 2018. (http://www.agsiw.org/wp-content/uploads/2018/04/Ibish_Saudi-Iraq_ONLINE-1.pdf)

¹² Tangentially, the U.A.E. has recently supported efforts by Abbas's rival Mohammed Dahlan to boost his influence in Gaza. See Dov Lieber, "UAE, Other Countries Pledge \$15 Million Per Month in Gaza," *Times of Israel*, August 17, 2017. (<https://www.timesofisrael.com/uae-other-countries-pledge-15-million-per-month-to-gaza/>)

A 2016 investigation of Wahhabism and terrorism by the *New York Times* called Saudi Arabia “both the arsonists and the firefighters,” crediting the kingdom with fighting terrorist groups while criticizing it for feeding the ideological extremism that bolsters terrorism’s appeal.¹³ On the other hand, the kingdom has recently adopted some notable reforms in this regard, including new restrictions on its austere religious police, a pledge to grant women the right to drive later this year, a superb statement on Holocaust remembrance, and jailing some hardline clerics.¹⁴

Yet it is important to evaluate the extent to which some of the Gulf monarchies still contribute to the extremism that complicates our shared fight against terrorism. Some G.C.C. states continue to enable incitement through state-backed educational materials, by state-backed religious officials, or in state-backed media outlets.

I testified before this Committee last year on incitement in Saudi Arabia’s government-published school textbooks, but on these matters I unfortunately do not have good news to report to you today. I have since examined Saudi Arabia’s new textbooks for the 2017-2018 school year and found that virtually all of the problematic material still remained.¹⁵

These current books call for the execution of people who engage in anal sex, commit adultery, or convert away from Islam. They call Christianity “an invalid, perverted religion,” call Christians and Jews “who disbelieved... the worst of creatures,” and falsely claim the goal of Zionism is a “global Jewish government.”¹⁶ The Anti-Defamation League is therefore endorsing the Saudi Educational Transparency and Reform Act (H.R. 4549), judicious and important legislation by Chairman Poe and Ranking Member Keating that gives this urgent problem the priority it deserves.

Hateful incitement by Gulf media outlets is all too present a problem today. For example, anti-Semitic incitement in Qatar’s press is unfortunately the norm rather than the exception to the rule.¹⁷ This is also often the case with certain other media

¹³ Scott Shane, “Saudis and Extremism: ‘Both the Arsonists and the Firefighters,’” *New York Times*, August 25, 2016. (<https://www.nytimes.com/2016/08/26/world/middleeast/saudi-arabia-islam.html>)

¹⁴ David Ignatius, “Are Saudi Arabia’s Reforms for Real? A Recent Visit Says Yes,” *Washington Post*, March 1, 2018. (https://www.washingtonpost.com/opinions/global-opinions/are-saudi-arabias-reforms-for-real-a-recent-visit-says-yes/2018/03/01/a11a4ca8-1d9d-11e8-9de1-147dd2df3829_story.html?utm_term=.89bca368fdd3)

¹⁵ David Andrew Weinberg, “Congress Must Act to End Incitement in Saudi Textbooks,” *Huffington Post*, December 5, 2017. (https://www.huffingtonpost.com/entry/congress-must-act-to-end-incitement-in-saudi-textbooks_us_5a26b5bbe4b0e383e63c3cae)

¹⁶ *Ibid.*

¹⁷ See, for example, Anti-Defamation League, “Qatar Media Publish Conspiratorial Cartoons Suggesting Israel Behind Gulf Diplomatic Crisis,” *ADL Blog*, June 28, 2017. (<https://www.adl.org/blog/qatari-media-publish-conspiratorial-cartoons-suggesting-israel-behind-gulf-diplomatic-crisis>); Anti-Defamation League, “Qatari Media Propagates Anti-Semitic Cartoons in Criticizing Bahraini Delegation to Jerusalem,” *ADL Blog*, December 18, 2017. (<https://www.adl.org/blog/qatari-media-propagates-anti-semitic-cartoons-in-criticizing-bahraini-delegation-to-jerusalem>)

outlets in the Gulf as well.¹⁸ The Qatari state-backed television network Al Jazeera continues to be a particularly egregious source of such incitement. For example, Al Jazeera provides unfettered airtime to terrorists and terror financiers,¹⁹ and it regularly lionizes Palestinian terrorists as “martyrs”.²⁰

Likewise, religious incitement in the Gulf states continues to be a problem today, including by state-backed religious officials.

For example, this past December Qatar hosted a sermon at its state-controlled Grand Mosque broadcast on state television, in which the speaker sought to tell the world’s Muslims that Jews have “enmity and hatred to you in their blood and their veins.” The preacher further described the Jewish people as “your deceitful, lying, treacherous, fornicating, intransigent enemy.” He even claimed that Israel received its weapons from Satan in an apparent derogatory reference to the United States.²¹ Another sermon delivered in July at the Qatari Grand Mosque and on Qatari state television described Christians and Jews as dangerous enemies to Muslims and falsely accused Jews of defiling the Temple Mount / Noble Sanctuary in Jerusalem.²²

State media in Abu Dhabi broadcast remarks this past year by an imam of Abu Dhabi’s state-controlled grand mosque in which he decried “the wickedness of the Jews” and their supposed “control of the media... for the destruction of the Islamic nation.”²³ He was reportedly reprimanded by Abu Dhabi’s authorities for anti-Hindu

¹⁸ See, for example, Anti-Defamation League, “Arabic Language Media Propagate Anti-Semitic Cartoons in Wake of President Trump’s Recognition of Jerusalem as Israel’s Capital,” *ADL Blog*, December 11, 2017. (<https://www.adl.org/blog/arabic-language-media-propagate-anti-semitic-cartoons-in-wake-of-president-trumps-recognition>); Anti-Defamation League, “Anti-Semitic Cartoons in Arabic-Language Media Allege Israeli/Jewish Domination of U.S.,” *ADL Blog*, December 19, 2017. (<https://www.adl.org/blog/anti-semitic-cartoons-in-arabic-language-media-allege-israelijewish-domination-of-us>)

¹⁹ See, for example, David Andrew Weinberg, Oren Adaki, and Grant Rumley, “The Problem with Al Jazeera,” *National Interest*, September 10, 2014. (<http://nationalinterest.org/feature/the-problem-al-jazeera-11239>); Al Jazeera Arabic, “Episode Title: Abu Muhammed al-Jolani, Emir of Jabhat al-Nusra,” *Program Title: Without Borders*, May 27, 2015. (<http://www.aljazeera.net/reportslibrary/pages/0ff4461d-72aa-4d5e-bb79-2c05ed15e559>); Al Jazeera Arabic, “Episode Title: Muthanna Al-Dhari,” *Program: Without Borders*, October 26, 2016. (<https://goo.gl/A7E8G4>); Al Jazeera Arabic, “Episode Title: Saleh al-Arouri,” *Program Title: Without Borders*, January 3, 2018. (<https://goo.gl/Yq4V2h>)

²⁰ @DavidAWeinberg, “Search: martyr and #AlJazeera,” *Twitter*, (<https://goo.gl/yB6DLh>)

²¹ David Andrew Weinberg, “Qatari Backing for Extremist Preachers and Anti-Semitic Incitement,” *ADL Blog*, April 10, 2018. (<https://www.adl.org/blog/qatari-backing-for-extremist-preachers-and-anti-semitic-incitement>)

²² *Ibid.*

²³ Middle East Media Research Institute (MEMRI) TV Monitor Project, “U.A.E. Cleric Wassim Yousef: The Media was the Jews’ First Weapon against Islam,” *Middle East Media Research Institute (MEMRI)*, clip no. 6091, June 13, 2017. (<https://www.memri.org/tv/uae-cleric-wicked-jews-control-the-media/transcript>); Profile of Waseem Yousef, Emirates Center for Strategic Studies and Research, accessed April 23, 2018. (http://www.ecssr.com/ECSSR/appmanager/portal/ecssr?_nfpb=true&_nfls=false&_pageLabel=profilesPage&_event=CustomEventViewPro&prfId=%2FProfile%2FProfiles_3065.xml&lang=en)

remarks in 2015,²⁴ and my understanding is that he was privately reprimanded again for these anti-Semitic remarks but still retains his post at the Grand Mosque.

Part II. Terror Finance Trends

How Significant Is Gulf Terror Finance?

The Persian Gulf region is the world's hotbed for terrorist finance. On one side of the Gulf is Iran, the world's biggest state sponsor of terror and the patron of radical Shi'ite Islamist groups worldwide. At the top of the Gulf is Iraq, which is still struggling to consolidate its authority over territory retaken from the Islamic State. And on the other side of the Gulf are the six Arab monarchies of the G.C.C.

The G.C.C. states are home to roughly half of the Mideast's "ultra high net worth" individuals.²⁵ Nearly all of these countries also have religious environments shaped at least in part by Wahhabism, a brand of Islam so austere that its historically intolerant teachings about non-Muslims have become pivotal to the ideologies of al-Qaeda and the Islamic State.²⁶ Thus, it should come as little surprise that in 2014 the U.S. reported al-Qaeda's core leadership in Pakistan had raised millions of dollars from deep pocket donors, mostly from sympathizers in this part of the Gulf.²⁷

As secretary of state, Hillary Clinton signed a 2009 memo outlining concerns about private terrorist financing in Saudi Arabia, Kuwait, the United Arab Emirates, and Qatar (in addition to Pakistan). The memo asserted that "donors in Saudi Arabia constitute the most significant source of funding to Sunni terrorist groups worldwide."²⁸ By 2014, however, U.S. officials reportedly concluded that donors in tiny Qatar may have surpassed Saudi Arabia as the largest source of such funds.²⁹ That year the top U.S. official for combating terrorist finance praised Saudi Arabia

²⁴ Shubhajit Roy, "TV Cleric Fired after he Slams UAE Grant for Temple during Modi Visit," *The Indian Express*, September 25, 2015. (<http://indianexpress.com/article/india/india-others/tv-cleric-fired-after-he-slams-uae-grant-for-temple-during-modi-visit/>)

²⁵ "Saudis Top Middle East Ultra Rich List," *Arab News*, October 7, 2015. (<http://www.arabnews.com/featured/news/816391>)

²⁶ David Andrew Weinberg, "Don't Let Wahhabism Off the Hook," *The Weekly Standard*, October 26, 2016. (<https://www.weeklystandard.com/dont-let-wahhabism-off-the-hook/article/2005069>)

²⁷ U.S. Treasury Department, "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,'" March 4, 2014. (<https://www.treasury.gov/press-center/press-releases/Pages/jl2308.aspx>)

²⁸ Douglas C. Hengel, "US embassy cables: Hillary Clinton says Saudi Arabia 'a critical source of terrorist funding,'" *The Guardian*, Dec 5, 2010. (<https://www.theguardian.com/world/us-embassy-cables-documents/242073>)

²⁹ Robert Windrem, "Who's Funding ISIS? Wealthy Gulf 'Angel Investors,' Officials Say," *NBC News*, September 21, 2014. (<https://www.nbcnews.com/storyline/isis-terror/who-s-funding-isis-wealthy-gulf-angel-investors-officials-say-n208006>)

and the U.A.E. for efforts to crack down on terror financiers but called out Kuwait and Qatar in comparison as “permissive jurisdictions” for terrorist finance.³⁰

The U.S. Policy Record:

In September 2014, the Obama administration persuaded all six Gulf monarchies to join in an initiative called the Jeddah Communiqué, which laid out the steps they committed to take in the fight against the Islamic State. They agreed to stop the flow of foreign fighters, repudiate the hateful ideology of I.S. and other violent extremists, to combat terrorist finance, and to end the impunity of its practitioners.³¹ As I testified before this Committee in 2015³² and wrote in subsequent articles,³³ the implementation of these commitments by the Gulf states has varied considerably.

When President Trump visited Riyadh as the first stop on his first official foreign trip, he urged over fifty heads of state from the Arab and Muslim worlds to do more to tackle terrorism and the extremism that fuels it. In what was considered possibly the top achievement of that visit,³⁴ America and the G.C.C. states also signed a deal to establish a Terrorist Financing Targeting Center (T.F.T.C.) in Riyadh, which the U.S. has used to coordinate joint terrorist designations with all six G.C.C. states.³⁵

However, terror finance in the region is still a serious concern. In February 2017, the Obama administration’s Assistant Treasury Secretary for Terrorist Financing revealed immediately after stepping down that “there continue to be designated terrorist financiers operating openly and notoriously “in both Qatar and Kuwait.³⁶ The State Department’s latest Country Reports on Terrorism, which were published

³⁰ Robert Mendick, “Terror financiers are living freely in Qatar, US discloses,” *The Telegraph*, November 16, 2014. (<https://www.telegraph.co.uk/news/worldnews/islamic-state/11233407/Terror-financiers-are-living-freely-in-Qatar-US-discloses.html>)

³¹ U.S. State Department, “Jeddah Communiqué,” September 11, 2014. (<https://2009-2017.state.gov/r/pa/prs/ps/2014/09/231496.htm>)

³² David Andrew Weinberg, “Terrorist Financing: Kidnapping, Antiquities Trafficking, and Private Donations,” Testimony before the House Foreign Affairs Committee’s Subcommittee on Terrorism, Nonproliferation, and Trade, November 17, 2015.

(<http://docs.house.gov/meetings/FA/FA18/20151117/104202/HHRG-114-FA18-Wstate-WeinbergD-20151117.pdf>)

³³ David Andrew Weinberg, “Obama is Right: The Gulf Arabs Ride Free on Terrorism,” *National Interest*, April 26, 2016. (<http://nationalinterest.org/feature/obama-right-the-gulf-arabs-ride-free-terrorism-15945>); David Andrew Weinberg, “Qatar Is Worst In The Region On Counterterrorism, But Other Gulf Monarchies Are Not Off The Hook,” *Huffington Post*, August 3, 2017. (https://www.huffingtonpost.com/entry/qatar-is-worst-in-the-region-on-counterterrorism-but_us_598236b7e4b03d0624b0abcc)

³⁴ Michael Warren, “One of Trump’s Top Foreign Trip Achievements? An Agreement to Stop Financing Terror, Says White House,” *The Weekly Standard*, March 31, 2017. (<https://www.weeklystandard.com/one-of-trumps-top-foreign-trip-achievements-an-agreement-to-stop-financing-terror-says-white-house/article/2008268>)

³⁵ U.S. Treasury Department, “U.S. and Saudi Arabia to Co-Chair New Terrorist Financing Targeting Center,” May 21, 2017. (<https://www.treasury.gov/press-center/press-releases/Pages/sm0092.aspx>)

³⁶ David Andrew Weinberg, “Terror Financiers “Operating Openly” in Qatar and Kuwait,” *Foundation For Defense of Democracies*, February 14, 2017. (<http://www.defenddemocracy.org/media-hit/david-weinberg-terror-financiers-operating-openly-in-qatar-and-kuwait/>)

in July 2017 and cover the year 2016, stated that “terrorist financiers within the country are still able to exploit Qatar’s informal financial system.” and that “a number of U.N.-designated terrorist financiers continue to operate in Kuwait.”³⁷

The Qatar Crisis:

In June 2017, Saudi Arabia, the United Arab Emirates, Egypt, and Bahrain imposed trade and travel sanctions on Qatar over its support for Islamist extremists throughout the region, including Qatar’s record of turning a blind eye to local terror financiers. This Arab quartet also imposed sanctions on dozens of individuals and organizations it accused of funding terrorism with links to Qatar.³⁸

Under pressure, Qatar then signed a U.S. memorandum of understanding (M.o.U.) in July on combating terrorist financing.³⁹ The text of the memorandum has been withheld from the public by both governments, making it next to impossible for outside observers to evaluate how credible it is and whether or not Doha is honoring its terms.⁴⁰ It is reported that Qatar agreed to place U.S. Justice Department officials inside its Office of Public Prosecution, which had historically failed to effectively prosecute and convict local terror financiers.⁴¹ At least some of the al-Qaeda financiers who had previously enjoyed legal impunity in Doha were rearrested and are now being retried.⁴²

³⁷ U.S. State Department, “Chapter 2: The Middle East and North Africa,” *Country Reports on Terrorism 2016*, July 2017 (<https://www.state.gov/j/ct/rls/crt/2016/272232.htm>)

³⁸ Emirates News Agency “43 New Designations Specifically Address Threats Posed by Qatar Linked and Based Al Qaida Terrorism Support Networks,” *Emirates News Agency*, September 6, 2017. (<http://wam.ae/en/details/1395302618259>)

Al Arabiya English, “Arab Powers List 59 Individuals as Qatar-linked Terrorism Supporters,” *Al Arabiya English*, June 9, 2017. (<https://english.alarabiya.net/en/News/gulf/2017/06/09/Arab-countries-release-list-of-terrorist-financiers-supported-by-Qatar.html>)

Saudi Press Agency, “Kingdom, UAE, Bahrain, Egypt Add 9 Entities, 9 Individuals to Lists of Terrorist Groups,” *Saudi Press Agency*, July 25, 2017.

(<http://www.spa.gov.sa/viewfullstory.php?lang=en&newsid=1650830>)

³⁹ U.S. State Department, “Press Availability With Qatari Foreign Minister Sheikh Mohammed bin Abdulrahman al-Thani,” July 11, 2017.

(<https://www.state.gov/secretary/20172018/tillerson/remarks/2017/07/272522.htm>)

⁴⁰ Josh Rogin, “Congress demands clarity on Trump administration’s dealings with Qatar,” *Washington Post*, December 20, 2017. (<https://www.washingtonpost.com/news/josh-rogin/wp/2017/12/20/congress-demands-clarity-on-trump-administrations-dealings-with-qatar/>)

⁴¹ Tom Finn, Sylvia Westall “U.S. to Deploy Officials in Qatar in Counter-terrorism Accord: Sources,” *Reuters*, July 20, 2017. (<https://www.reuters.com/article/us-gulf-qatar-usa/u-s-to-deploy-officials-in-qatar-in-counter-terrorism-accord-sources-idUSKBN1A51ZD>)

Matthew Levitt, Katherine Bauer, “Qatar Doesn’t Need a Blockade. It Needs an Audit,” *Foreign Policy*, June 15, 2017. (<http://foreignpolicy.com/2017/06/15/qatar-doesnt-need-a-blockade-it-needs-an-audit-al-qaeda/>)

⁴² *Inter alia*, Declan Walsh, “Tiny, Wealthy Qatar Goes Its Own Way, and Pays for It,” *New York Times*, January 22, 2018. (<https://www.nytimes.com/2018/01/22/world/middleeast/qatar-saudi-emir-boycott.html>); Sigurd Neubauer, “The Rift between Qatar and the GCC Could Threaten Trump’s Foreign Policy,” *National Interest*, August 8, 2017. (<http://nationalinterest.org/feature/the-rift-between-qatar-the-gcc-could-threaten-trumps-foreign-21829?page=4>)

Days after the M.o.U., Qatar's emir issued a decree specifying the sanctions his government would impose on terrorist entities and finally authorizing the creation of public lists for those terrorist actors and organizations who would be subject to these penalties.⁴³ Qatar's first such public designation happened jointly under the new U.S.-G.C.C. targeting center in Riyadh.

That designation happened in October, and it was the largest multilateral designation of terrorist entities in the Middle East.⁴⁴ It targeted eleven individuals and organizations linked to operations in Yemen by al-Qaeda or the Islamic State.⁴⁵ The fact these designations went ahead at all in spite of the ongoing Gulf crisis was a surprising but positive development.

Qatar then issued its closest thing yet to a global list of banned terrorist entities immediately after a visit by the U.S. Treasury Department's Assistant Secretary for Terrorist Financing Marshall Billingslea last month.⁴⁶ However, the list still has enormous – and inexcusable – gaps.⁴⁷

On the plus side, Qatar's list included some of its own citizens for the first time. However, at least one Qatari local under U.S. and U.N. sanctions on charges of funding to al-Qaeda, Khalifa al-Subaiy, was conspicuously left off of Qatar's list.⁴⁸ The new Qatari list targeted the Islamic State's branch in Egypt but left off I.S.'s central branch in Syria and Iraq, as well as the rest of its branches around the world. Al-Qaeda financiers were targeted on Qatar's list, but al-Qaeda itself was not.

Part III. The Major Terrorist Groups

Six major terrorist entities that seek to conduct financial operations in the Gulf or have financial vulnerabilities there are the Islamic State, al-Qaeda, Hamas, Hezbollah, Iran's Islamic Revolutionary Guard Corps, and the Taliban. The following section proceeds group by group, noting recent efforts by G.C.C. governments to combat terrorist finance and related activities by these six organizations.

⁴³ Deutsche Welle "Qatar changes anti-terror legislation amid Gulf crisis," *Deutsche Welle*, July 21, 2017. (<http://www.dw.com/en/qatar-changes-anti-terror-legislation-amid-gulf-crisis/a-39783146>)

⁴⁴ U.S. Treasury Department, "Remarks of U.S. Treasury Secretary Steven Mnuchin at the Future Investment Initiative Conference in Riyadh, Saudi Arabia," October 25, 2017. (<https://www.treasury.gov/press-center/press-releases/Pages/sm0188.aspx>)

⁴⁵ U.S. Treasury Department, "Treasury and Terrorist Financing Targeting Center Partners Issue First Joint Sanctions Against Key Terrorists and Supporters," October 25, 2017. (<https://www.treasury.gov/press-center/press-releases/Pages/sm0187.aspx>)

⁴⁶ Qatar Central Bank, "Qatar Central Bank Governor Meets US Assistant Secretary of Treasury for Counterterrorism Financing," March 20, 2018. (<http://www.qcb.gov.qa/English/News/Pages/news19032018.aspx>); Qatar National Counterterrorism Committee, Qatar Ministry of the Interior, "Terrorist Designations List (3/21/2018)" March 21, 2018, accessed April 23, 2018. (<https://nctc.moi.gov.qa/list2.html>)

⁴⁷ David Andrew Weinberg, "Qatar's Swiss Cheese Terrorism List," *Anti-Defamation League*, April 11, 2018. (<https://www.adl.org/news/op-ed/qatars-swiss-cheese-terrorism-list>)

⁴⁸ My thanks to Katherine Bauer for this insight.

The Islamic State

The G.C.C. states are generally doing an excellent job in the fight against Islamic State finance. All six Gulf monarchies are members of the Global Coalition against Daesh, and Saudi Arabia co-chairs the coalition's Counter ISIL Finance Group along with Italy and the United States. Bahrain, Saudi Arabia, and the U.A.E. have each conducted airstrikes in Syria against the Islamic State⁴⁹ and sanctioned the Islamic State on their public lists of banned terrorist organizations.⁵⁰ Kuwait, Oman, and Qatar have not done either, except for Qatari sanctions on I.S.'s Egyptian affiliate.⁵¹

All five of the Sunni-ruled Gulf countries have done a relatively good job since 2014 at cracking down on their foreign fighters going to or coming back from Syria and Iraq. They have also taken decisive legal action against a number of I.S. supporters.

All of the G.C.C. states consider themselves threatened by the Islamic State, and at least two of them have been victims of successful attacks by the group. In June 2015, an I.S. suicide bomber who had transited from Saudi Arabia through Bahrain killed 27 and injured over 200 at the Shi'ite Imam Sadeq Mosque in Kuwait City.⁵² Saudi Arabia reported in 2017 that it had suffered over 60 attacks on its soil by I.S. or al-Qaeda, 34 of which were carried out the previous year.⁵³ Among the attempted targets of those I.S. attacks included the U.S. consulate in Jeddah, the Prophet's Mosque in Medina, Shi'ite mosques, and Saudi security forces.

As of 2016 Saudi Arabia had already arrested and was pursuing legal action against over 500 individuals on suspicion of terrorist activity on behalf of the Islamic State.⁵⁴ That year Bahrain convicted 24 citizens, 16 of whom in absentia, for forming

⁴⁹ Michael Lipin, Laila Azimi, "Saudi Arabia Touts Closer US Cooperation Against IS as Pressure Mounts," *VOA News*, April 4, 2017. (<https://www.voanews.com/a/saudi-arabia-touts-closer-us-cooperation-against-is-as-pressure-mounts/3795238.html>)

⁵⁰ Saudi Press Agency, "Ministry of Interior: Injunctions on Security and Ideology for Citizens and Residents," *Saudi Press Agency*, March 7, 2014. (<http://www.spa.gov.sa/viewstory.php?newsid=1206762>)
Emirates News Agency, "UAE Cabinet Approves List of Designated Terrorist Organizations, Groups," *Emirates News Agency*, November 16, 2014. (<http://wam.ae/en/details/1395272478814>)
Bahrain News Agency, "Cabinet Approves Terrorist Organizations List," *Bahrain News Agency*, November 4, 2016. (<http://www.bna.bh/portal/en/news/721645>)

⁵¹ David Andrew Weinberg, "Qatar's Swiss Cheese Terrorism List," *Anti-Defamation League*, April 11, 2018. (<https://www.adl.org/news/op-ed/qatars-swiss-cheese-terrorism-list>)

⁵² Schams Elwazer, Hamdi Alkhshali and Don Melvin, "Kuwait government says mosque suicide bomber was Saudi national," *CNN*, June 29, 2015. (<https://www.cnn.com/2015/06/28/middleeast/kuwait-mosque-suicide-bombing/index.html>)

⁵³ Embassy of the Kingdom of Saudi Arabia, "Saudi Arabia and Counterterrorism," *Embassy of the Kingdom of Saudi Arabia*, April 2017. (http://ksamissioneru.net/wp-content/uploads/2017/04/White-Paper_Counterterrorism_April2017.pdf) (page 7).

⁵⁴ Lori Plotkin Boghardt, "From ISIS to Activists," *The Washington Institute for Near East Policy*, May 2016. (<http://www.washingtoninstitute.org/uploads/Documents/pubs/ResearchNote33-Boghardt-6.pdf>)

an Islamic State cell.⁵⁵ The U.A.E. convicted 34 individuals as part of an I.S. copycat cell,⁵⁶ sentenced a self-proclaimed local I.S. chief to life in prison, and executed his wife for stabbing to death an American teacher in Abu Dhabi.⁵⁷ According to Sigurd Neubauer, Qatar has convicted 25 Islamic State sympathizers, although public details on their cases have been scarce.⁵⁸ Kuwait convicted 15 individuals on charges related to the Imam Sadeq Mosque bombing⁵⁹ and sentenced another I.S.-supporter to life in prison for ramming his truck into a vehicle carrying U.S. troops.⁶⁰

Al-Qaeda:

Al-Qaeda capitalized on its prominent role in the fight against Syria's Assad regime, as well as on its differentiation from the Islamic State, to revitalize its appeal to Gulf private donors. In 2016, the Nusra Front tried to capitalize on this advantage by rebranding itself as distinct from al-Qaeda, but the U.S. government appropriately rejected this fiction, updating its terrorist designation of Nusra to reflect that "whether it calls itself Jabhat Fath al Sham or al-Nusra Front, the group remains al-Qa'ida's affiliate in Syria."⁶¹

This shift on the part of al-Qaeda reportedly happened following input from more than one Gulf government. According to *Reuters*, Gulf intelligence officials, including from Qatar, met with Nusra's leader to urge him to make this name change in hopes of securing outside support.⁶² According to Western and Middle Eastern government officials cited in a number of news reports, Al-Qaeda in Syria allegedly has also benefitted from numerous ransom payments from the government of Qatar.⁶³ Similarly, al-Qaeda in Yemen reportedly received roughly \$20 million in ransom payments in 2012 and 2013 from the governments of Qatar and Oman.⁶⁴

⁵⁵ U.S. State Department, "Chapter 2: The Middle East and North Africa," *Country Reports on Terrorism 2016*, July 2017 (<https://www.state.gov/j/ct/rls/crt/2016/272232.htm>)

⁵⁶ Mustafa Al Zarooni, "34 found guilty of setting up Daesh-style group in UAE," *Khaleej Times*, March 28, 2016. (<https://www.khaleejtimes.com/nation/crime/34-found-guilty-of-bid-to-set-up-daesh-style-caliphate>)

⁵⁷ Naser Al Remeithi, "Husband of Reem Island Killer Sentenced to Life in Prison for Terror Charges," *The National*, May 9, 2016. (<https://www.thenational.ae/uae/husband-of-reem-island-killer-sentenced-to-life-in-prison-for-terror-charges-1.211891>)

⁵⁸ Sigurd Neubauer, "The Rift between Qatar and the GCC Could Threaten Trump's Foreign Policy," *National Interest*, August 8, 2017. (<http://nationalinterest.org/print/feature/the-rift-between-qatar-the-gcc-could-threaten-trumps-foreign-21829>)

⁵⁹ "Seven Sentenced to Death Over Kuwaiti Mosque Bombing - News Agency," *Reuters*, September 14, 2015. (<https://uk.reuters.com/article/uk-kuwait-security/seven-sentenced-to-death-over-kuwaiti-mosque-bombing-news-agency-idUKKCN0RF0JN20150915>)

⁶⁰ AFP, "Kuwait Gives Jihadist Life for Attack on US Troops," *The Daily Mail*, June 11, 2017.

(<http://www.dailymail.co.uk/wires/afp/article-4593386/Kuwait-gives-jihadist-life-attack-US-troops.html>)

⁶¹ U.S. State Department, "State Department Amendments to the Terrorist Designation of al-Nusra Front," November 10, 2016. (<https://20092017.state.gov/r/pa/prs/ps/2016/11/264230.htm>)

⁶² David Andrew Weinberg, "Analysis: Deterring Gulf States from backing the new Al Nusra Front," *Long War Journal*, July 29, 2016. (<https://www.longwarjournal.org/archives/2016/07/analysis-deterring-gulf-states-from-backing-the-new-al-nusra-front.php>)

⁶³ David Andrew Weinberg, "Terrorist Financing: Kidnapping, Antiquities Trafficking, and Private Donations," Testimony before the House Foreign Affairs Committee's Subcommittee on Terrorism,

U.S. officials described Kuwait in 2014 as “the epicenter of fundraising for terrorist groups in Syria.”⁶⁵ They noted that many Kuwait-based financiers hired local fundraising captains in Qatar and solicited online donations from individuals in Saudi Arabia.⁶⁶ At the start of the 2017 Gulf crisis, there was no public proof of legal action having been taken against even a single al-Qaeda financier in Qatar,⁶⁷ although it later turned out limited and ineffective legal action had been pursued in private. Compare that with Saudi Arabia, for example, which has convicted hundreds of individuals on charges of supporting terrorist groups, primarily al-Qaeda.⁶⁸ In so doing, Riyadh has frozen over €30 million in suspect funds.⁶⁹

Impunity in Qatar:

Katherine Bauer and Matthew Levitt of the Washington Institute for Near East Policy discovered some worrisome information last year about Qatar’s judicial efforts against terror finance.⁷⁰ On the plus side, they did find that Doha had privately prosecuted five individuals who had previously been enjoying Qatari legal impunity despite being under U.S. and U.N. terror finance sanctions. However, they noted that by the start of the 2017 Gulf crisis not a single one of the five was actually serving time in Qatari prison as a result of those charges: two had been acquitted, one was convicted *in absentia* because he had been released and left the country, one had been freed in 2008 (only to resume funding al-Qaeda, according to the

Nonproliferation, and Trade, November 17, 2015.

(<http://docs.house.gov/meetings/FA/FA18/20151117/104202/HHRG-114-FA18-Wstate-WeinbergD-20151117.pdf>)

⁶⁴Rukmini Callimachi, “Paying Ransoms, Europe Bankrolls Qaeda Terror,” *New York Times*, July 29, 2014. (<https://www.nytimes.com/2014/07/30/world/africa/ransoming-citizens-europe-becomes-al-qaedas-patron.html>); Ellen Knickmeyer, “Al Qaeda-Linked Groups Increasingly Funded by Ransom,” *Wall Street Journal*, July 29, 2014. (<https://www.wsj.com/articles/ransom-fills-terrorist-coffers-1406637010>)

⁶⁵ Karen DeYoung, “Kuwait, Ally on Syria, is also the Leading Funder of Extremist Rebels,” *Washington Post*, April 25, 2014. (https://www.washingtonpost.com/world/national-security/kuwait-top-ally-on-syria-is-also-the-leading-funder-of-extremist-rebels/2014/04/25/10142b9a-ca48-11e3-a75e-463587891b57_story.html?utm_term=.5596d1d0e87d)

⁶⁶ U.S. Treasury Department, “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,” March 4, 2014. (<https://www.treasury.gov/press-center/press-releases/Pages/jl2308.aspx>)

⁶⁷ David Andrew Weinberg, “Qatar and Terror Finance: Part II: Private Funders of al-Qaeda in Syria,” *Foundation for Defense of Democracies*, January 2017. (http://www.defenddemocracy.org/content/uploads/documents/11717_Weinberg_Qatar_Report.pdf)

⁶⁸ FATF, “Terrorist Financing FATF Report To G20 Leaders,” *FATF*, November 2015. (<http://www.fatf-gafi.org/media/fatf/documents/reports/Terrorist-financing-actions-taken-by-FATF.pdf>)

Lori Plotkin Boghardt, “From ISIS to Activists,” *The Washington Institute for Near East Policy*, May 2016. (<http://www.washingtoninstitute.org/uploads/Documents/pubs/ResearchNote33-Boghardt-6.pdf>)

⁶⁹ FATF, “Terrorist Financing FATF Report To G20 Leaders,” *FATF*, November 2015. (<http://www.fatf-gafi.org/media/fatf/documents/reports/Terrorist-financing-actions-taken-by-FATF.pdf>)

⁷⁰Matthew Levitt, Katherine Bauer, “Qatar Doesn’t Need a Blockade. It Needs an Audit,” *Foreign Policy*, June 15, 2017. (<http://foreignpolicy.com/2017/06/15/qatar-doesnt-need-a-blockade-it-needs-an-audit-al-qaeda/>)

U.N.)⁷¹ and one was allowed to serve time under house arrest.⁷² Since the U.S.-Qatar M.o.U. was signed, all four of the five still in Qatar have apparently faced new trials.⁷³

However, the effectiveness of even these new measures by Qatar is now in question. Qatar told the *New York Times* earlier this year that it had rearrested 'Abd al-Rahman al-Nu'aymi pending a new trial.⁷⁴ The U.S. government had sanctioned Nu'aymi in 2013, stating that he had given millions of dollars to al-Qaeda over a decade,⁷⁵ and he was subsequently sanctioned by the United Nations, U.K., E.U., Turkey, and even by his own government last month.⁷⁶

Yet Nu'aymi was spotted in public again just two weeks ago, on the very same day the Emir of Qatar was telling President Trump that "we do not tolerate with [sic] people who support and fund terrorism."⁷⁷ Nu'aymi was free to pose for pictures at his son's wedding standing next to the Hamas arch-terrorist Khaled Meshal.⁷⁸ The wedding was blessed by a broadcaster for Qatari state media⁷⁹ and attended by none other than Qatar's prime minister,⁸⁰ a fact now confirmed by the Qatari state.⁸¹

⁷¹ United Nations Security Council, "Narrative Summaries of Reasons for Listing," March 9, 2009, accessed April 24, 2018.

(https://www.un.org/sc/suborg/en/sanctions/1267/qa_sanctions_list/summaries/individual/khalifa-muhammad-turki-al-subaiy)

⁷² For more on these individuals, see David Andrew Weinberg, "Qatar and Terror Finance," *Foundation for Defense of Democracies*, December 2014.

(http://www.defenddemocracy.org/content/uploads/publications/Qatar_Part_I.pdf); David Andrew Weinberg, "Qatar and Terror Finance: Part II: Private Funders of al-Qaeda in Syria," *Foundation for Defense of Democracies*, January 2017.

(http://www.defenddemocracy.org/content/uploads/documents/11717_Weinberg_Qatar_Report.pdf)

⁷³ *Inter alia*, Declan Walsh, "Tiny, Wealthy Qatar Goes Its Own Way, and Pays for It," *New York Times*, January 22, 2018. (<https://www.nytimes.com/2018/01/22/world/middleeast/qatar-saudi-emir-boycott.html>); Sigurd Neubauer, "The Rift between Qatar and the GCC Could Threaten Trump's Foreign Policy," *National Interest*, August 8, 2017. (<http://nationalinterest.org/feature/the-rift-between-qatar-the-gcc-could-threaten-trumps-foreign-21829?page=4>)

⁷⁴ Declan Walsh, "Tiny, Wealthy Qatar Goes Its Own Way, and Pays for It," *New York Times*, January 22, 2018. (<https://www.nytimes.com/2018/01/22/world/middleeast/qatar-saudi-emir-boycott.html>)

⁷⁵ U.S. Treasury Department, "Treasury Designates Al-Qa'ida Supporters in Qatar and Yemen," December 18, 2013. (<https://www.treasury.gov/press-center/press-releases/Pages/j12249.aspx>)

⁷⁶ David Andrew Weinberg, "Qatar and Terror Finance: Part II: Private Funders of al-Qaeda in Syria," *Foundation for Defense of Democracies*, January 2017, page 6.

(http://www.defenddemocracy.org/content/uploads/publications/Qatar_Part_I.pdf);

Qatar National Counterterrorism Committee, Qatar Ministry of the Interior, "Terrorist Designations List (3/21/2018)" March 21, 2018, accessed April 23, 2018. (<https://nctc.moi.gov.qa/list2.html>)

⁷⁷ White House, "Remarks by President Trump and Amir Tamim Bin Hamad Al Thani of the State of Qatar Before Bilateral Meeting," April 10, 2018. (<https://www.whitehouse.gov/briefings-statements/remarks-president-trump-amir-tamim-bin-hamad-al-thani-state-qatar-bilateral-meeting/>); "Qatar Government Communications Office Statement in Response to The Telegraph Article," *The Peninsula*, April 22, 2018, accessed April 24, 2018. (<https://thepeninsulaqatar.com/article/22/04/2018/Qatar-Government-Communications-Office-statement-in-response-to-The-Telegraph-article>)

⁷⁸ "Wedding.. Abdullah Abd al-Rahman Umayr al-Jaber al-Nu'aymi," April 15, 2018, accessed April 23, 2018. (<http://www.raya.com/news/pages/575ede8d-0b86-48fb-9bab-6c574abb2e32>)

⁷⁹ @DavidAWeinberg, "It's hard to know what's worse: that Nuaymi was free to attend his son's wedding weeks after being designated a terrorist by his even own govt & months after #Qatar told NYT he was in

As I have documented in two separate monographs about Qatar and terrorist finance, Doha has repeatedly assured the U.S. in past years that it would henceforth keep specific local terror financiers under control, only to have it later emerge that those individuals then reengaged in funding al-Qaeda.⁸² Doha has yet to demonstrate how this time is different.

Impunity in Kuwait:

Despite having a record at combating terror finance that in some ways is just as spotty as Qatar's, Kuwait has dodged similar scrutiny in the past year; it has even been thanked by the U.S. for mediating the Gulf dispute.⁸³ Since the start of last year, the Trump State Department and Obama administration's last Treasury Assistant Secretary for Terrorist Financing each confirmed that internationally-designated terror financiers have been operating with impunity in Kuwait.⁸⁴

In 2014 Kuwait even went so far as to let the fox guard the henhouse in this regard, appointing a justice minister who appeared to have endorsed several fundraising campaigns for Syrian jihadists, one of which the U.S. said was funding al-Qaeda.⁸⁵ He resigned under U.S. pressure but appears to remain on faculty at Kuwait's flagship

jail, or that it seems the party was attended & blessed by a top religion anchor for state media" *Twitter*, April 13, 2018. (<https://twitter.com/DavidAWeinberg/status/984970913631391749>)

⁸⁰ "Al Arabiya Expose Sheds Light on Qatar'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>)

⁸¹ "Qatar Government Communications Office Statement in Response to The Telegraph Article," *The Peninsula*, April 22, 2018, accessed April 24, 2018. (<https://thepeninsulaqatar.com/article/22/04/2018/Qatar-Government-Communications-Office-statement-in-response-to-The-Telegraph-article>)

⁸² David Andrew Weinberg, "Qatar and Terror Finance: Part I: Negligence," *Foundation for Defense of Democracies*, December 2014.

(http://www.defenddemocracy.org/content/uploads/publications/Qatar_Part_I.pdf); David Andrew Weinberg, "Qatar and Terror Finance: Part II: Private Funders of al-Qaeda in Syria," *Foundation for Defense of Democracies*, January 2017.

(http://www.defenddemocracy.org/content/uploads/documents/11717_Weinberg_Qatar_Report.pdf)

⁸³ White House, "Remarks by President Trump and Emir Sabah al-Ahmed al-Jaber al-Sabah of Kuwait in Joint Press Conference," September 7, 2017. (<https://www.whitehouse.gov/briefings-statements/remarks-president-trump-emir-sabah-al-ahmed-al-jaber-al-sabah-kuwait-joint-press-conference/>)

⁸⁴ U.S. State Department, "Chapter 2: The Middle East and North Africa," *Country Reports on Terrorism 2016*, July 2017 (<https://www.state.gov/j/ct/rls/crt/2016/272232.htm>); David Andrew Weinberg, "Terror Financiers "Operating Openly" in Qatar and Kuwait," *Foundation For Defense of Democracies*, February 14, 2017. (<http://www.defenddemocracy.org/media-hit/david-weinberg-terror-financiers-operating-openly-in-qatar-and-kuwait/>)

⁸⁵ David Andrew Weinberg, "New Kuwaiti Justice Minister Has Deep Extremist Ties," *The National Interest*, January 16, 2014. (<http://nationalinterest.org/commentary/new-kuwaiti-justice-minister-has-deep-extremist-ties-9719>); David Andrew Weinberg, "Kuwait's Embattled Justice Minister Part of Deeper Terror Finance Problem," *The National Interest*, April 10, 2014. (<http://nationalinterest.org/commentary/kuwait-embattled-justice-minister-part-deeper-terror-finance-10225>)

public university, Kuwait University,⁸⁶ as do several Kuwaiti preachers who are currently under international terror finance sanctions.

As of this week, the website of Kuwait University's College of Sharia and Islamic Studies appears to list three separate individuals as faculty members who are currently under U.S. sanctions on charges of funding al-Qaeda.⁸⁷ Those individuals are Abd al-Muhsin al-Mutayri, Shafi al-Ajmi, and Hamid Hamad Hamid al-Ali.⁸⁸

In addition to being under sanctions by the U.S., the latter two preachers are also sanctioned by the United Nations, which means that they should be subject in Kuwait to a travel ban and asset freeze.⁸⁹ According to the U.S. Treasury Department, al-Ali has described himself as an "al-Qaeda commando" and "used students in Kuwait to courier funds" to al-Qaeda's Syrian branch.⁹⁰ One year after being sanctioned by the U.S. in 2014, al-Ali was reportedly also given his old job back as a mosque preacher by order of the Kuwaiti government.⁹¹

Hamas:

In private settings, some Gulf officials acknowledge the obvious truth that Hamas is a terrorist organization. However, not a single one of America's G.C.C. allies has yet shown the courage to formally designate Hamas as such.

Saudi Arabia's Approach to Hamas:

⁸⁶ "Faculty Members – Department of Jurisprudence and its Origins," accessed April 23, 2018. (<http://www.shariakuniv.com/members4>)

⁸⁷ "Faculty Members – Department of Tafsir and Hadith," accessed April 23, 2018. (<http://www.shariakuniv.com/members1>) Archived versions of this webpage also list two middle names for both Shafi al-Ajmi and Abd al-Muhsin al-Mutayri, each of which matches the full names in their U.S. sanctions designations. See Internet Archive Wayback Machine, "Faculty Members – Department of Tafsir and Hadith," archived April 9, 2014.

(<http://web.archive.org/web/20140409143113/http://www.shariakuniv.com/members1>)

⁸⁸ U.S. Treasury Department, "Treasury Designates Additional Supporters of the Al-Nusrah Front and Al-Qaida," August 22, 2014. (<https://www.treasury.gov/press-center/press-releases/Pages/jl2613.aspx>); U.S. Treasury Department, "Treasury Designates Al-Qaida, Al-Nusrah Front, AQAP, and ISIL Fundraisers And Facilitators," May 19, 2016. (<https://www.treasury.gov/press-center/press-releases/Pages/jl0462.aspx>); U.S. Treasury Department, "Treasury Designates Three Key Supporters of Terrorists in Syria and Iraq," August 6, 2014. (<https://www.treasury.gov/press-center/press-releases/Pages/jl2605.aspx>)

⁸⁹ United Nations Security Council, "Narrative Summaries of Reasons for Listing: Shafi Sultan Mohammed al-Ajmi," April 20, 2016, accessed April 24, 2018.

(https://www.un.org/sc/suborg/en/sanctions/1267/qa_sanctions_list/summaries/individual/shafi-sultan-mohammed-al-ajmi); United Nations Security Council, "Narrative Summaries of Reasons for Listing: Hamid Hamad Al-Ali," August 15, 2014, accessed April 24, 2018. (https://www.un.org/sc/suborg/en/sanctions/1267/qa_sanctions_list/summaries/individual/hamid-hamad-hamid-al-%E2%80%98ali)

⁹⁰ U.S. Treasury Department, "Treasury Designates Additional Supporters of the Al-Nusrah Front and Al-Qaida," August 22, 2014. (<https://www.treasury.gov/press-center/press-releases/Pages/jl2613.aspx>)

⁹¹ Turki al-Mughames, "Hamid al-Ali again... as an Imam for al-Adsani Mosque," *al-Rai Media*, April 21, 2015. (<http://www.alraimedia.com/Home/Details?Id=a03ddfb1-f47b-4acf-a0d5-496f887ee717>)

At the end of the reign of Saudi Arabia's late King Abdullah, the kingdom arrested several Hamas financiers and coerced Qatar into doing the same. However, with his passing in January 2015, the pressure to keep those terror financiers in custody dissipated, and in both countries they were set free.⁹²

In Saudi Arabia, the most prominent of these Hamas operatives released from prison in 2015 was Mahir Salah. According to the U.S. Treasury Department, he "led the Hamas Finance Committee in Saudi Arabia, the largest center of Hamas's financial activity" and oversaw the transfer of tens of millions of dollars to Hamas's military wing in Gaza.⁹³

Mahir Salah has since reemerged for public appearances in Lebanon,⁹⁴ Turkey,⁹⁵ Egypt,⁹⁶ and Malaysia, including with the Malaysian premier.⁹⁷ He enjoys the title of Hamas's "ra'ees" abroad, meaning president, boss, or chief.⁹⁸ Although it is possible that Mahir Salah may have left the kingdom for good, another senior Hamas financial official designated by the U.S. at the same time as him, Abu Ubayda al-Agha, apparently remains a free man in the Saudi city of Jeddah.⁹⁹ Al-Agha is under U.S. sanctions on charges of transferring millions of dollars to Hamas in Gaza.¹⁰⁰

Qatar's Approach to Hamas:

⁹² David Andrew Weinberg, "Terrorist Financing: Kidnapping, Antiquities Trafficking, and Private Donations," Testimony before the House Foreign Affairs Committee's Subcommittee on Terrorism, Nonproliferation, and Trade, November 17, 2015. (<http://docs.house.gov/meetings/FA/FA18/20151117/104202/HHRG-114-FA18-Wstate-WeinbergD-20151117.pdf>)

⁹³ U.S. Treasury Department, "Treasury Sanctions Major Hamas Leaders, Financial Facilitators and a Front Company," September 10, 2015. (<https://www.treasury.gov/press-center/press-releases/Pages/jl0159.aspx>)

⁹⁴ "Hamas Official Abroad: Jerusalem is Indivisible United and Whoever Ignites War against it Must Bear the Consequences," *al-Mayadeen*, December 17, 2017; (<http://www.almayadeen.net/news/politics/846285/details>); "Leadership Delegation from Hamas Headed by Abu Marzouq Meets Shalah," *Hamas website*, December 18, 2017, accessed April 23, 2018. (<http://hamas.ps/ar/post/8342/>); "Pictures: Hamas Official Abroad: United Jerusalem Cannot Be Divided," *Hamas website*, December 17, 2017, accessed April 23, 2018. (<https://goo.gl/1f755w>); "Leadership Delegation from Hamas Visits the President of the Lebanese Chamber of Deputies," *Hamas website*, December 19, 2017, accessed April 23, 2018. (<https://goo.gl/9Hn2gd>)

⁹⁵ "Document: Speech by Leader Mahir Salah at al-Quds Pioneers Forum 9 in Istanbul," *Palestinian Media Center*, October 21, 2017. (<https://goo.gl/nHTGnZ>)

⁹⁶ "Al-Nunu: New Delegation of Hamas Leaders Arrives to Cairo," *Palestinian Media Center*, February 22, 2018. (<https://goo.gl/kFvAFa>)

⁹⁷ "Pictures: Leadership Delegation from Hamas Meets the Malaysian Prime Minister," *Palestinian Media Center*, December 6, 2017. (<https://goo.gl/Pj6rN4>)

⁹⁸ "Text of Speech by Hamas Movement President Abroad the Brother Mahir Salah at 30th Anniversary Festival in Lebanon," *Hamas website*, December 17, 2017, accessed April 23, 2018. (<http://hamas.ps/ar/post/8341/>)

⁹⁹ "Jeddah – Dinner Party for Pilgrims to the House of Allah, the Haram," *Date Tree – The al-Agha Family website*, August 22, 2017, accessed April 23, 2018. (<http://elagha.net/13731>)

¹⁰⁰ U.S. Treasury Department, "Treasury Sanctions Major Hamas Leaders, Financial Facilitators and a Front Company," September 10, 2015. (<https://www.treasury.gov/press-center/press-releases/Pages/jl0159.aspx>)

There is really no comparison between Saudi Arabia and Qatar's current policies toward Hamas. Saudi Arabia condemns the group for its extremism, seeks its marginalization,¹⁰¹ and has generally eschewed meetings with the group since hosting Khalid Meshal for meetings in 2015 and hosting Meshal and Ismail Haniyeh at a reception by the Saudi Embassy in Doha in 2016.¹⁰²

Meanwhile, Qatar actively promotes Hamas and praises it as a "legitimate resistance movement."¹⁰³ Qatar funds Hamas development projects in the Gaza Strip so lavishly that the U.S. condemned it in 2014 for "openly financ[ing] Hamas."¹⁰⁴

Although U.S. and Israeli officials are more precise in their terminology these days, crediting Doha with limiting those funds to relief and development initiatives,¹⁰⁵ the timing and allocation of these disbursements are clearly designed to bolster Hamas.¹⁰⁶ Qatar has also reportedly provided funding for the living expenses and organizational activities of Hamas operatives living in Doha.¹⁰⁷ At the height King Abdullah of Saudi Arabia's pressure on Qatar over Hamas in late 2014, for example, Hamas official Hussam Badran declared that "there is no suspension of the Qatari financial support for the movement, since their relationship is ongoing."¹⁰⁸

Qatar has hosted Hamas leaders on and off for decades. The United States allegedly granted its permission for Qatar to host Hamas leader Khaled Meshal when he left

¹⁰¹ John Irish, "Saudi minister says Qatar must end support for Hamas, Muslim Brotherhood," *Reuters*, June 6, 2017. (<https://www.reuters.com/article/us-gulf-qatar-saudi-fm/saudi-minister-says-qatar-must-end-support-for-hamas-muslim-brotherhood-idUSKBN18X2CR>)

¹⁰² Fahd al-Otaibi, "Has Hamas completely forgotten Saudi Arabia?," *Al Monitor*, 2016. (<http://web.archive.org/web/20170502041800/http://www.al-monitor.com/pulse/originals/2017/02/hamas-relations-iran-saudi-arabia-military-wing.html>)

¹⁰³ "Qatari FM insists Hamas 'a legitimate resistance movement,'" *The Times of Israel*, June 10, 2017. (<https://www.timesofisrael.com/qatari-fm-insists-hamas-a-legitimate-resistance-movement/>)

¹⁰⁴ U.S. Treasury Department, "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," March 24, 2014. (<https://www.treasury.gov/press-center/press-releases/Pages/jl2308.aspx>)

¹⁰⁵ Armin Rosen, "Bipartisan Congressional Letter Questions Nikki Haley's Stance on Hamas," *Tablet Magazine*, April 21, 2017. (<http://www.tabletmag.com/scroll/249951/bipartisan-congressional-letter-questions-nikki-haleys-stance-on-hamas>); "Israeli minister: Qatar making true effort to stop Gaza aid from boosting Hamas," *The Times of Israel*, March 16, 2018. (<https://www.timesofisrael.com/israeli-minister-qatar-making-true-effort-to-stop-gaza-aid-from-boosting-hamas/>)

¹⁰⁶ See, for example, Adam Rasgon, "Haniyeh: Qatar To Send \$100 Million In Aid To Gaza," *The Jerusalem Post*, February 12, 2017. (<http://www.jpost.com/Middle-East/Haniyeh-Qatar-to-send-100-million-to-Gaza-481335>)

¹⁰⁷ Michael Buchanan, "Freed Palestinian Prisoners Adapt to Qatar Exile," *BBC*, February 1, 2012. (<http://www.bbc.com/news/world-middle-east-16638652>); "Qatar Asks Hamas Elements to Leave its Territory, which Israel Considers a Positive Step," *al-Mayadeen*, June 3, 2017, archived on June 9, 2017 by Internet Archive Wayback Machine, (<http://web.archive.org/web/20170609092519/http://www.almayadeen.net/news/politics/58225>)

¹⁰⁸ Adnan Abu Amer, "Egypt-Qatar rapprochement rattles Hamas," *Al-Monitor*, December 30, 2014. (<http://web.archive.org/web/20170208155649/http://www.al-monitor.com/pulse/originals/2014/12/egypt-qatar-rapprochement-hamas.html>)

Syria in 2012.¹⁰⁹ However, Hamas activities in Qatar since then have exceeded anything the U.S. might have authorized at the time or should tolerate now, going so far as to include money laundering, recruitment, directing West Bank terror cells,¹¹⁰ and apparently cyberterrorism as well.¹¹¹

It is also true that some of the Hamas operatives in Qatar made their way there after being released and deported as part of a deal with Israel for the release of the hostage Gilad Shalit. However, several of those individuals have reengaged in plotting terrorist attacks against Israeli citizens from Qatari territory, clearly something that Israel and the U.S. do not and should not tolerate.¹¹²

Hamas's Base in Qatar Remains:

Hamas lists thirteen individuals on its website as members of the group's top decision-making body, the Hamas political bureau (also known as its politburo).¹¹³ Of those thirteen, most have been spotted in Qatar during the last year, and a sizeable plurality of them are still appear to be based there today.

Under heavy pressure at the start of the Gulf crisis last summer, Qatar is reported to have asked several Hamas commanders who were most heavily involved in military and financial operations to leave the country.¹¹⁴ Among those who left were Salah al-Arouri and Musa Dudin.¹¹⁵

However, others Hamas operatives have remained, including even some who have themselves engaged in such problematic activities.

¹⁰⁹ Dexter Filkins, "A Saudi Prince's Quest to Remake the Middle East," *The New Yorker*, April 9, 2018.

(<https://www.newyorker.com/magazine/2018/04/09/a-saudi-princes-quest-to-remake-the-middle-east>)
Qatar Tribune, "Qatar hosted Hamas, Taliban delegations at the request of US," *Qatar Tribune*, July 4, 2017. (<http://www.qatar-tribune.com/news-details/id/73511>)

¹¹⁰ David Andrew Weinberg, "Terrorist Financing: Kidnapping, Antiquities Trafficking, and Private Donations," Testimony before the House Foreign Affairs Committee's Subcommittee on Terrorism, Nonproliferation, and Trade, November 17, 2015.

(<http://docs.house.gov/meetings/FA/FA18/20151117/104202/HHRG-114-FA18-Wstate-WeinbergD-20151117.pdf>)

¹¹¹ David Shamah, "Qatari tech helps Hamas in Tunnels, Rockets: Expert," *The Times of Israel*, July 31, 2014. (<http://www.timesofisrael.com/qatari-tech-helps-hamas-in-tunnels-rockets-expert/>)

¹¹² David Andrew Weinberg, "Terrorist Financing: Kidnapping, Antiquities Trafficking, and Private Donations," Testimony before the House Foreign Affairs Committee's Subcommittee on Terrorism, Nonproliferation, and Trade, November 17, 2015.

(<http://docs.house.gov/meetings/FA/FA18/20151117/104202/HHRG-114-FA18-Wstate-WeinbergD-20151117.pdf>)

¹¹³ "Members of the Political Bureau," *Hamas website*, accessed April 23, 2018.

(<http://hamas.ps/ar/politicalofficemembers>)

¹¹⁴ "Qatar Asks Hamas Elements to Leave its Territory, which Israel Considers a Positive Step," *al-Mayadeen*, June 3, 2017, archived on June 9, 2017 by Internet Archive Wayback Machine,

(<http://web.archive.org/web/20170609092519/http://www.almayadeen.net/news/politics/58225>)

¹¹⁵ Jack Houry, "Palestinians Confirm: Top Hamas Officials Have Left Qatar at Country's Request," *Haaretz*, June 5, 2017. (<https://www.haaretz.com/middle-east-news/palestinians/palestinians-confirm-hamas-officials-left-qatar-at-country-s-request-1.5480301>)

Most obviously, Khaled Meshal remains in Qatar,¹¹⁶ where he has been described by the government as a “dear guest”.¹¹⁷ Meshal led Hamas as its longtime politburo chief until last year, but despite being succeeded in that role by Ismail Haniyeh, he remains a member of that senior body to this day.¹¹⁸ According to his personal U.S. sanctions designation, Meshal has been responsible for Hamas terrorist attacks as well as the financing of terror.¹¹⁹ Qatar downplays his presence, claiming inaccurately that he is not personally under U.S. sanctions and that he is “retired.”¹²⁰

Hussam Badran:

The one name I most want for you to come away from this hearing remembering, however, is Hussam Badran. Badran is an infamous terrorist commander who appears to be enjoying safe haven in Qatar today despite allegedly engaging in a broad range of terrorist activity there.

In 2002, Israel announced Hussam Badran’s arrest, describing him as the head of Hamas’s military wing in the northern half of the West Bank. As such, it identified him as a mastermind of many of the most horrible terrorist attacks of the Second Intifada, stating the following:

“Badran was responsible for the following terror attacks: The attack in the Dolphinarium, the Sbarro restaurant in Jerusalem, the Nahariya train station, Matza restaurant in Haifa, the bus in Haifa, the bus near Emmanuel, the village of Hamra and the Park Hotel in Netanya. In these terror attacks, directed by Badran, over 100 people were killed and hundreds were wounded.”¹²¹

¹¹⁶ “Wedding.. Abdullah Abd al-Rahman Umayr al-Jaber al-Nu’aymi,” April 15, 2018, accessed April 23, 2018. (<http://www.raya.com/news/pages/575edebed-0b86-48fb-9bab-6c574abb2e32>)

¹¹⁷ Peter Kovessy, “Qatar FM: Hamas leader to remain in Doha as ‘dear guest’,” *Doha News*, January 13, 2015. (<https://dohanews.co/qatar-fm-hamas-leader-remain-doha-dear-guest/>)

¹¹⁸ “Members of the Political Bureau,” *Hamas website*, accessed April 23, 2018. (<http://hamas.ps/ar/politicalofficemembers>)

¹¹⁹ U.S. Treasury Department, “U.S. Designates Five Charities Funding Hamas and Six Senior Hamas Leaders as Terrorist Entities,” August 22, 2003. (<https://www.treasury.gov/press-center/press-releases/Pages/js672.aspx>)

¹²⁰ “Qatar Government Communications Office Statement in Response to The Telegraph Article,” *The Peninsula*, April 22, 2018, accessed April 24, 2018. (<https://thepeninsulaqatar.com/article/22/04/2018/Qatar-Government-Communications-Office-statement-in-response-to-The-Telegraph-article>)

¹²¹ IDF Spokesman, “Arrest of Husam Ataf Ali Badran- Head of the Hamas military wing in Samaria,” *Israel Ministry of Foreign Affairs*, April 18, 2002. (<http://mfa.gov.il/MFA/PressRoom/2002/Pages/Arrest%20of%20Husam%20Ataf%20Ali%20Badran-%20Head%20of%20the%20Hamas.aspx>)

Among the 600+ casualties of those attacks included three American citizens who were killed and seven who were physically injured.¹²² Although Badran served some time in Israeli prison for these crimes, Israel prematurely released him under duress as part of an exchange for the release of the hostage Gilad Shalit. According to Israel he has resumed operational terrorist activities since moving to Qatar.

In 2013, the Israel Defense Forces (I.D.F.) announced the capture of a Hamas cell in Hebron that it said was stockpiling assault weapons for a plot to kidnap Israeli soldiers; Israel revealed that “their primary contact person abroad was Husam Badran” in Qatar.¹²³ Then, in 2015, the I.D.F. exposed that Hussam Badran “led the establishment” of a sprawling Hamas terror cell and command center in Nablus and that he “transferred hundreds of thousands of dollars” to it with gold and jewelry smuggled through Jordan.¹²⁴

Many do not realize that this Qatar-based individual has such direct blood on his hands because he also serves a more visible role as a spokesperson for Hamas. As far back as the 1990s, Badran melded his role as a terrorist commander with a day job directing Hamas’s press office in Nablus.¹²⁵ In more recent years, he has served as a senior spokesperson for Hamas and was elected to its politburo last year.¹²⁶

Other Hamas Operatives Still in Qatar:

Additional Hamas operatives who serve in a variety of terrorist roles continue to be based in Qatar.

Along with Khaled Meshal and Hussam Badran, other members of the Hamas politburo also appear to have remained behind in Qatar since Arouri’s departure, including Sami Khater and Izzat al-Risheq.¹²⁷ Ismail Haniyeh and Mousa Abu

¹²²Osen Attorneys at Law, LLC, “United States District Court Eastern District of New York,” *Osen Attorneys at Law, LLC*, June 17, 2016. (https://www.osenlaw.com/sites/default/files/06-17-16_Strauss_Fifth_Amended_Complaint_ECF.pdf); Michael Goldblatt, Morton A. Klein, Susan B. Tuchman, “ZOA to Jordan’s King: Honor Extradition Treaty – Send Jew Killer Tamimi to U.S.,” *Zionist Organization of America*, April 7, 2017. (<https://zoa.org/2017/04/10358941-zoa-to-jordans-king-honor-extradition-treaty-send-jew-killer-tamimi-to-u-s/>)

¹²³ Israel Defense Forces, “IDF & ISA Uncover Hamas Terrorist Assets in Hebron,” *Israel Defense Forces*, January 31, 2013. (<http://web.archive.org/web/20170315033248/https://www.idfblog.com/2013/01/31/idf-isa-uncover-hamas-terrorist-assets-in-hebron/>)

¹²⁴ Israel Defense Forces, “When Hamas Tries to Establish a Terror Network – We Stop Them,” *Israel Defense Forces*, March 7, 2015. (<https://www.idf.il/en/minisites/hamas/when-hamas-tries-to-establish-a-terror-network-we-stop-them/>)

¹²⁵ IDF Spokesman, “Arrest of Husam Ataf Ali Badran- Head of the Hamas military wing in Samaria-18-Apr-2002,” *Israel Ministry of Foreign Affairs*, April 18, 2002. (<http://mfa.gov.il/MFA/PressRoom/2002/Pages/Arrest%20of%20Husam%20Ataf%20Ali%20Badran-%20Head%20of%20the%20Hamas.aspx>); “Hussam Badran,” *Hamas website*, accessed April 23, 2018. (<http://hamas.ps/ar/politicalofficemember/37>)

¹²⁶ Ibid.

¹²⁷ “Members of the Political Bureau,” *Hamas website*, accessed April 23, 2018. (<http://hamas.ps/ar/politicalofficemembers>)

Marzouq, senior Hamas leaders who like Meshal are personally under U.S. sanctions for their role in terrorist attacks and/or terrorist finance, have been known to spend extensive time in Qatar as well, although Haniyeh is clearly based now in Gaza.¹²⁸

Other senior Hamas officials who reportedly may still be spending time in Qatar during this period include Maher Obeid and Mohammed Nasr.¹²⁹ Obeid served as a major Hamas money launderer¹³⁰ and was identified by Israel as the new external head of Hamas military operations for the West Bank after Arouri's 2017 departure from Doha.¹³¹ Mohammed Nasr is responsible for managing the terrorist group's relationship with its Iranian sponsor and visited Tehran as recently as October.¹³²

There is also no specific indication that Doha has deported or constrained several other Hamas officials who have been named by Israel or in press reports as Qatar-based terrorist operatives or financiers aiding Hamas cells in the West Bank. Those individuals include Mohamed al-Qawasmi, Talal Shareem, and Hisham Hejazi.¹³³

Even though Qatar accepted a terror finance M.o.U. with the United States last year, it clearly continues to provide a safe haven to Hamas terrorist operatives – far beyond any token political presence for the group that may have been intentionally tolerated in the past by the United States. Until Qatar expels all Hamas terrorist operatives, it should face consequences in its relationship with Washington.

Hezbollah:

America's Gulf allies have all done a relatively more consistent job combating Hezbollah, the terrorist group responsible for killing the most American citizens prior to 9/11. Their willingness to do so is largely attributable to events in Syria and

¹²⁸U.S. State Department, "State Department Terrorist Designations of Ismail Haniyeh, Harakat al-Sabireen, Lisa al-Thawra, and Harakat Sawa'd Misr (HASM)," July 31, 2018. (<https://www.state.gov/r/pa/prs/ps/2018/01/277792.htm>); U.S. Treasury Department, "U.S. Designates Five Charities Funding Hamas and Six Senior Hamas Leaders as Terrorist Entities," August 22, 2003. (<https://www.treasury.gov/press-center/press-releases/Pages/js672.aspx>)

¹²⁹"Palestinian Sources: Leaders from Hamas Left Doha," *Al-Ghad (Jordan)*, June 8, 2017. (<http://www.alghad.com/articles/1657732>)

¹³⁰David Andrew Weinberg, "Terrorist Financing: Kidnapping, Antiquities Trafficking, and Private Donations," Testimony before the House Foreign Affairs Committee's Subcommittee on Terrorism, Nonproliferation, and Trade, November 17, 2015. (<http://docs.house.gov/meetings/FA/FA18/20151117/104202/HHRG-114-FA18-Wstate-WeinbergD-20151117.pdf>)

¹³¹Elior Levy, "New Head of Hamas Terror Operations in West Bank Revealed," *Ynet News*, January 10, 2018. (<https://www.ynetnews.com/articles/0.7340.L-5069099.00.html>)

¹³²"Hamas Delegation Arrives in Tehran to Meet Iranian Officials," *Asharq Al-Awsat*, October 21, 20017. (<https://aawsat.com/english/home/article/1059346/hamas-delegation-arrives-tehran-meet-iranian-officials>)

¹³³David Andrew Weinberg, "Terrorist Financing: Kidnapping, Antiquities Trafficking, and Private Donations," Testimony before the House Foreign Affairs Committee's Subcommittee on Terrorism, Nonproliferation, and Trade, November 17, 2015. (<http://docs.house.gov/meetings/FA/FA18/20151117/104202/HHRG-114-FA18-Wstate-WeinbergD-20151117.pdf>)

more recently in Yemen, where the G.C.C. states find themselves on the opposite side of two civil wars from Hezbollah.

Following Bahrain's lead, the Gulf Cooperation Council declared Hezbollah as a terrorist group in 2016, suggesting that its other member states intended to do the same.¹³⁴ Saudi Arabia has gone one step further, sanctioning a number of individual Hezbollah operatives already on the U.S. sanctions list¹³⁵ and even issuing new joint designations with the U.S. on other Hezbollah operatives.¹³⁶

Hezbollah's Gulf branch was responsible for the 1996 Khobar Towers bombing in Saudi Arabia that killed 19 American service members and a Saudi national, as well as injuring nearly 500.¹³⁷ Saudi Arabia captured the mastermind of that attack in 2015 with help from American intelligence.¹³⁸ Bahrain has identified Hezbollah backing for numerous terrorist plots inside its territory.¹³⁹ Kuwait recently convicted over 20 individuals¹⁴⁰ on charges related to an enormous weapons cache hidden by a Hezbollah terrorist cell in its territory that included 40,000 pounds of ammunition and 300 pounds of explosives.¹⁴¹ Most G.C.C. states have expelled purported Hezbollah supporters in recent years,¹⁴² and the U.A.E. sentenced seven individuals on charges related to forming a Hezbollah cell in the country in 2016.¹⁴³

¹³⁴ "Gulf Arab states label Hezbollah a terrorist organization," *Reuters*, March 2, 2016.

(<https://www.reuters.com/article/us-gulf-hezbollah/gulf-arab-states-label-hezbollah-a-terrorist-organization-idUSKCN0W40XF>)

¹³⁵ David Andrew Weinberg, "Saudi Arabia Sanctions Hezbollah Officials," *Foundation for Defense of Democracies*, December 3, 2015. (<http://www.defenddemocracy.org/media-hit/david-weinberg-saudi-arabia-sanctions-hezbollah-officials/>)

¹³⁶ U.S. Treasury Department, "Treasury Sanctions Hizballah Financiers and Operatives," October 20, 2016. (<https://www.treasury.gov/press-center/press-releases/Pages/jl0587.aspx>)

U.S. State Department, "State Department Terrorist Designations of Hashem Safieddine and Muhammad al-Isawi," May 19, 2017. (<https://www.state.gov/r/pa/prs/ps/2017/05/270982.htm>)

¹³⁷ U.S. Justice Department, "'Attorney General Statement' regarding Khobar indictment," June 21, 2001. (<https://www.justice.gov/archive/opa/pr/2001/June/275ag.htm>)

¹³⁸ Ali Hashem, "With Khobar bomber's arrest, Saudi Arabia deals blow to Iran," *Al-Monitor*, August 31, 2015. (<http://web.archive.org/web/20171130230035/https://www.al-monitor.com/pulse/originals/2015/08/lebanon-saudi-arrest-mughassil-assir.html>)

¹³⁹ Ismaeel Naar, "Bahrain Says Hezbollah Backs Terrorist Cells Targeting its Security," *Al Arabiya*, January 22, 2018. (<https://english.alarabiya.net/en/News/gulf/2018/01/22/Bahrain-Hezbollah-supports-terror-cells-targeting-our-security.html>)

¹⁴⁰ "Kuwaiti court upholds death sentence for member of alleged Iran spy cell," *Reuters*, July 21, 2016.

(<https://www.reuters.com/article/us-kuwait-security/kuwaiti-court-upholds-death-sentence-for-member-of-alleged-iran-spy-cell-idUSKCN1011MY>)

¹⁴¹ "Kuwait seizes arms, holds suspects in militant plot - local media," *Reuters*, August 13, 2015.

(<https://uk.reuters.com/article/uk-kuwait-security/kuwait-seizes-arms-holds-suspects-in-militant-plot-local-media-idUKKCN0Q12DX20150813>)

¹⁴² Sami Aboudi, "Lebanese expats fearful as Gulf expels dozens accused of Hezbollah links," *Reuters*, April 8, 2016. (<https://www.reuters.com/article/us-gulf-hezbollah-lebanon/lebanese-expats-fearful-as-gulf-expels-dozens-accused-of-hezbollah-links-idUSKCN0X51R2>); "Qatar expels Lebanese after GCC Hezbollah decision," *Khaleej Times*, June 20, 2013.

(<https://www.khaleejtimes.com/article/20130620/ARTICLE/306209877/1016>); "Report: Lebanese Businessman Deported from Saudi Arabia Over Hezbollah Ties," *Naharnet*, July 26, 2013.

(<http://www.naharnet.com/stories/en/92113>); Barbara Surk, "Lebanon Shiites ousted from Gulf as

According to the *New York Times* and *FT*, last year Qatar's government allegedly paid part of an enormous ransom to Hezbollah's Iraqi offshoot and potentially to its central leadership in Lebanon as well. The elaborate purported accord, which has been called one of the "world's largest" ransom deals,¹⁴⁴ allegedly totaled up to a billion dollars in exchange for the release of a royal Qatari hunting party that had been taken hostage in southern Iraq.¹⁴⁵

Iran's Islamic Revolutionary Guard Corps:

Iran is the world's largest state sponsor of terrorism, and it perpetrates those actions by means of its Islamic Revolutionary Guard Corps (I.R.G.C.). Many of the I.R.G.C.'s clients are designated as terrorist entities by the United States and several Gulf states. The I.R.G.C. itself was finally sanctioned by the United States as a Specially Designated Global Terrorist in October,¹⁴⁶ although its Quds Force division has been sanctioned as such for over a decade.¹⁴⁷ The I.R.G.C. has also been responsible for major acts of subversion in nearly every Arabian country.

Although several Gulf governments have imposed limited diplomatic or direct trade sanctions against Iran, they have done remarkably little to force third-country companies in places like Europe or Asia to avoid enriching businesses controlled by the I.R.G.C., which holds sway over a major share of Iran's economy.¹⁴⁸

Iranian sanctions-busting networks have also exploited lax financial oversight in some parts of the Gulf, an ongoing U.S. concern that these host governments should do more to address.

Hezbollah fans," *The San Diego Union-Tribune*, July 11, 2013.

(<http://www.sandiegouniontribune.com/sdut-lebanon-shiites-ousted-from-gulf-as-hezbollah-fans-2013jul11-story.html>)

¹⁴³ "UAE court sentences Hezbollah cell," *Al Arabiya*, October 31, 2016.

(<https://english.alarabiya.net/en/News/middle-east/2016/10/31/UAE-court-sentences-homegrown-Hezbollah-cell.html>)

¹⁴⁴ Patrick Cockburn, "Iraq considers next move after intercepting 'world's largest' ransom for kidnapped Qataris," *The Independent*, April 26, 2017. (<https://www.independent.co.uk/news/world/middle-east/qatari-royals-kidnapped-iraq-ransom-half-billion-shia-militia-syria-saudi-hunters-baghdad-a7703946.html>)

¹⁴⁵ Robert F. Worth, "Kidnapped Royalty Become Pawns in Iran's Deadly Plot," *New York Times*, March 14, 2018. (<https://www.nytimes.com/2018/03/14/magazine/how-a-ransom-for-royal-falconers-reshaped-the-middle-east.html>); Erika Solomon, "The \$1bn Hostage Deal that Enraged Qatar's Gulf Rivals," *FT*, June 5, 2017. (<https://www.ft.com/content/dd033082-49e9-11e7-a3f4-c742b9791d43>)

¹⁴⁶ U.S. Treasury Department, "Treasury Designates the IRGC under Terrorism Authority and Targets IRGC and Military Supporters under Counter-Proliferation Authority," October 13, 2017.

(<https://www.treasury.gov/press-center/press-releases/Pages/sm0177.aspx>)

¹⁴⁷ U.S. Treasury Department, "Fact Sheet: Designation of Iranian Entities and Individuals for Proliferation Activities and Support for Terrorism," October 25, 2007. (<https://www.treasury.gov/press-center/press-releases/Pages/hp644.aspx>)

¹⁴⁸ David Andrew Weinberg & Mark Dubowitz, "Where Obama Fails on Iran Sanctions, the Gulf States Can Step In," *Wall Street Journal*, February 21, 2016. (<https://www.wsj.com/articles/where-obama-fails-on-iran-sanctions-the-gulf-states-can-step-in-1456096639>)

Although the U.A.E. has made some improvements, more must be done to boost oversight of economic free zones in the U.A.E.'s smaller emirates, whose lax regulatory environments have been a frequent target for Iranian sanctions busters. Oman was reported to have turned a blind eye to Iranian weapons smuggling to Yemen through its land and sea territory,¹⁴⁹ and it is unclear whether the Trump administration has been satisfied by Omani efforts since then.¹⁵⁰ Additionally, Kuwait and Dubai should permanently cease any and all business in their territories by Iran's Mahan Air,¹⁵¹ an airline that is under U.S. sanctions for deceptive financial practices and smuggling arms and fighters for the Quds Force and Hezbollah.¹⁵²

On the positive side of the ledger, it is now being reported that Bahrain's 2015 closure of Future Bank, a major local financial institution linked to Tehran, halted a sanctions-busting scheme involving billions of dollars of deceptive financial transactions enabling Iranian terror finance in the region.¹⁵³

The Taliban:

Neither the United States nor any of its Gulf allies formally designate the Afghan Taliban as a terrorist group, despite the fact that the Taliban is responsible for the vast majority of attacks against civilians in Afghanistan¹⁵⁴ and coordinates extensively on the battlefield and organizationally with al-Qaeda.¹⁵⁵

Although the United States has refrained from sanctioning the Afghan Taliban for utilitarian reasons in hopes of reaching a political accord with the group, such an accord remains elusive. Furthermore, doing so has arguably made it harder for the

¹⁴⁹ Yara Bayoumy, Phil Stewart, "Exclusive: Iran steps up weapons supply to Yemen's Houthis via Oman – officials," *Reuters*, October 19, 2016. (<https://www.reuters.com/article/us-yemen-security-iran/exclusive-iran-steps-up-weapons-supply-to-yemens-houthis-via-oman-officials-idUSKCN12K0CX>)

Ashraf al-Falahi, "Just how neutral is Oman in Yemen war?," *Al-Monitor*, October 12, 2016. (<http://web.archive.org/web/20170408225539/https://www.al-monitor.com/pulse/originals/2016/10/oman-neutral-saudi-war-iran-houthis.html>)

¹⁵⁰ David Welna, "Mattis Aims To Curb Iran's Influence On The Arabian Peninsula," *NPR*, March 12, 2018. (<https://www.npr.org/2018/03/12/592823591/mattis-middle-east-priority-curbing-irans-influence-on-the-arabian-peninsula>)

¹⁵¹ "Int. Route Network," *Mahan Air website*, accessed April 24, 2018.

(<https://www.mahan.aero/en/#intRouteMap>)

¹⁵² U.S. Treasury Department, "Treasury Designates Iranian Commercial Airline Linked to Iran's Support for Terrorism," October 12, 2011. (<https://www.treasury.gov/press-center/press-releases/Pages/tg1322.aspx>)

¹⁵³ Souad Mekhennet & Joby Warrick, "Billion-dollar sanctions-busting scheme aided Iran, documents show," *Washington Post*, April 3, 2018. (https://www.washingtonpost.com/world/national-security/billion-dollar-sanctions-busting-scheme-aided-iran-documents-show/2018/04/03/37be988a-3356-11e8-94fa-32d48460b955_story.html?utm_term=.25b476d1b7b4)

¹⁵⁴ U.S. State Department, "National Consortium for the Study of Terrorism and Responses to Terrorism: Annex of Statistical Information," *Country Reports on Terrorism 2016*, July 2017. (<https://www.state.gov/j/ct/rls/crt/2016/272241.htm>)

¹⁵⁵ Bill Roggio, "Designations highlight Taliban's longstanding ties to al Qaeda," *Long War Journal*, February 26, 2018. (<https://www.longwarjournal.org/archives/2018/01/designations-highlight-talibans-longstanding-ties-to-al-qaeda.php>)

U.S. to take a hard line against the group's operations in the Gulf, which is home to an enormous South Asian expatriate community in addition to the region's significant terror finance trends.

The Taliban has sought to exploit Saudi, Emirati, and Qatari territory over the years in order to help fund its operations.¹⁵⁶ For years the Saudi government allegedly turned a blind eye to Taliban fundraising in its territory,¹⁵⁷ but the kingdom has laudably taken a more assertive approach in recent years, undertaking joint designations with the U.S. of South Asian terror finance targets associated with the Taliban, Lashkar-e-Taiba, and al-Qaeda.¹⁵⁸

The Taliban's deceased leader Mullah Akhtar Mansour reportedly traveled to the U.A.E. eighteen times in the past decade or so on false papers, despite being on a U.N. watch list.¹⁵⁹ However, the U.A.E. has shown a very tangible commitment to fighting the Taliban, deploying its own special forces to Afghanistan for over a decade as well as close air support.¹⁶⁰ A terrorist bombing attributed to the Taliban last year took the life of the U.A.E. ambassador to Kabul and five other Emirati officials.¹⁶¹

Qatar hosts a Taliban political office in its territory as well as the Guantanamo Five, a group of senior Taliban commanders released by the U.S. in exchange for the hostage Bowe Bergdahl. Although Qatar was reportedly allowed to host the Taliban's embassy on its territory with U.S. permission,¹⁶² its broader approach to the group would seem to exceed what the U.S. would have allowed or what it should still be tolerating. For example, last year the *New York Times* quoted an Afghan official who indicated that Qatar is "home to about 100 Taliban officials and their

¹⁵⁶ The Guardian, "US embassy cables: Hillary Clinton says Saudi Arabia 'a critical source of terrorist funding,'" *The Guardian*, December 30, 2009. (<https://www.theguardian.com/world/us-embassy-cables-documents/242073>)

¹⁵⁷ Carlotta Gall, "Saudis Bankroll Taliban, Even as King Officially Supports Afghan Government," *New York Times*, December 6, 2016. (<https://www.nytimes.com/2016/12/06/world/asia/saudi-arabia-afghanistan.html>)

¹⁵⁸ U.S. Treasury Department, "United States and Saudi Arabia Designate Terrorist Fundraising and Support Networks," March 31, 2016. (<https://www.treasury.gov/press-center/press-releases/Pages/jl0400.aspx>); U.S. Treasury Department, "The U.S. and Saudi Arabia Take Joint Action Against Terrorist Financing Entity Attempting to Evade U.S. and UN Sanctions and Violate Saudi Laws," April 7, 2015. (<https://www.treasury.gov/press-center/press-releases/Pages/jl10019.aspx>)

¹⁵⁹ Eltaf Najafizada, "Taliban Says Ex-Leader Often Visited United Arab Emirates, Iran," *Stars and Stripes*, May 26, 2016. (<https://www.stripes.com/news/middle-east/afghanistan/taliban-says-ex-leader-often-visited-united-arab-emirates-iran-1.411516>)

¹⁶⁰ Rajiv Chandrasekaran, "In the UAE, the United States Has a Quiet, Potent Ally Nicknamed 'Little Sparta,'" *Washington Post*, November 9, 2014. (https://www.washingtonpost.com/world/national-security/in-the-uae-the-united-states-has-a-quiet-potent-ally-nicknamed-little-sparta/2014/11/08/3fc6a50c-643a-11e4-836c-83bc4f26eb67_story.html?utm_term=.c449449c1d61)

¹⁶¹ Ahmed Rashid, "UAE's relationship with Taliban questioned after Afghanistan bomb," *FT*, February 3, 2017. (<https://www.ft.com/content/981e4e76-cd31-3afd-9057-05da796a7bfb>)

¹⁶² Catherine Philip, "Taliban office in Qatar approved by US," *The Weekend Australian*, September 13, 2011. (<https://www.theaustralian.com.au/news/world/taliban-office-in-qatar-approved-by-us/news-story/13a00bc252d21e54bf9d82ebe6c107f4?sv=e31506763129bfd821e3600023ffc76e>)

relatives, who live comfortably at Qatari state expense.”¹⁶³ In addition, two senior Haqqani Group officials, including a top-tier fundraiser, were allegedly able to travel to Qatar, visit a member of the Taliban Five, and depart Qatar before being captured in Bahrain.¹⁶⁴ The Afghan government seeks the closure of the Taliban’s Doha office based on its view the office has had “no positive consequence in terms of facilitating the peace talks” and has taken no meaningful steps toward peace negotiations.¹⁶⁵

In the G.C.C., only the U.A.E. publicly designates the Taliban-linked Haqqani Group as a terrorist organization.¹⁶⁶ Only the U.A.E., and Bahrain publicly designate the Taliban’s Pakistani offshoot.¹⁶⁷ These are also the only G.C.C. countries that publicly designate Lashkar-e-Taiba, the terrorist group responsible for the 2008 Mumbai attacks that killed 166 people, including six Americans.¹⁶⁸

Part IV. Policy Recommendations:

1. Work with Gulf Allies to Publicly Designate All Terrorist Groups

Two G.C.C. states – Oman and Kuwait – do not have public lists of banned terrorist organizations. One G.C.C. state, Qatar, has a public list that is astonishingly inadequate. And three G.C.C. states – Saudi Arabia, the U.A.E., and Bahrain – are using public lists that still fall short in some key regards.

¹⁶³ Declan Walsh, “Qatar Opens Its Doors to All, to the Dismay of Some,” *New York Times*, July 16, 2017. (https://www.nytimes.com/2017/07/16/world/middleeast/doha-qatar-blockade.html?_r=0)

¹⁶⁴ <https://www.wsj.com/articles/haqqani-leaders-detained-in-persian-gulf-not-inside-afghanistan-1413733878>)

¹⁶⁵ Karim Amini, “Afghan Govt To Close Taliban Qatar Office,” *Tolo News*, February 23, 2018. (<https://www.tolonews.com/index.php/afghanistan/afghan-govt-close-taliban-qatar-office>)

¹⁶⁶ “Ministry of Interior: Injunctions on Security and Ideology for Citizens and Residents,” *Saudi Press Agency*, March 7, 2014. (<http://www.spa.gov.sa/viewstory.php?newsid=1206762>); <http://wam.ae/en/details/1395272478814>); “Cabinet Approves Terrorist Organizations List,” *Bahrain News Agency*, November 4, 2016. (<http://www.bna.bh/portal/en/news/721645>); Qatar National Counterterrorism Committee, Qatar Ministry of the Interior, “Terrorist Designations List (10/25/2017)” October 25, 2017, accessed April 23, 2018. (<https://nctc.moi.gov.qa/list.html>); Qatar National Counterterrorism Committee, Qatar Ministry of the Interior, “Terrorist Designations List (3/21/2018)” March 21, 2018, accessed April 23, 2018. (<https://nctc.moi.gov.qa/list2.html>)

¹⁶⁷ “Ministry of Interior: Injunctions on Security and Ideology for Citizens and Residents,” *Saudi Press Agency*, March 7, 2014. (<http://www.spa.gov.sa/viewstory.php?newsid=1206762>)

“UAE Cabinet Approves List of Designated Terrorist Organizations, Groups,” *Emirates News Agency*, November 16, 2014. (<http://wam.ae/en/details/1395272478814>)

“Cabinet Approves Terrorist Organizations List,” *Bahrain News Agency*, November 4, 2016. (<http://www.bna.bh/portal/en/news/721645>); Qatar National Counterterrorism Committee, Qatar Ministry of the Interior, “Terrorist Designations List (10/25/2017)” October 25, 2017, accessed April 23, 2018. (<https://nctc.moi.gov.qa/list.html>); Qatar National Counterterrorism Committee, Qatar Ministry of the Interior, “Terrorist Designations List (3/21/2018)” March 21, 2018, accessed April 23, 2018. (<https://nctc.moi.gov.qa/list2.html>)

¹⁶⁸ *Ibid.*; U.S. State Department, “Amendments to the Terrorist Designation of Lashkar e-Tayyiba,” April 2, 2018. (<https://www.state.gov/r/pa/prs/ps/2018/04/280125.htm>)

The U.S. should work intensively to convince these governments to all issue such lists, to post and update them publicly, and to harmonize them with the American understanding of terrorist organizations, as represented by the U.S. government's lists of Foreign Terrorist Organizations and Specially Designated Global Terrorists.

Most notably, the continued absence of any Palestinian terrorist groups from all of these lists is inexcusable. Hamas and Palestinian Islamic Jihad are Iranian-sponsored terrorist groups that intentionally and admittedly target civilians. Our true allies against I.R.G.C. aggression must be persuaded to acknowledge the terrorist nature of these Palestinian terror groups in public and not just in private, and to act against these organizations accordingly.

Additionally, we should work with our Gulf allies to ensure that they designate more South Asian terrorist groups in order to stem the flow of funding from private Gulf donors to these groups. Thus, the U.S. must persuade the majority of our Gulf allies to publicly ban as terrorist groups Lashkar-e-Taiba, the Haqqani Group, the Pakistani Taliban, and, yes, even the Afghan Taliban. That means the U.S. must seriously consider finally designating the Afghan Taliban as the terrorist group that we all know it is. Given Lashkar-e-Taiba's repeated efforts to rebrand itself,¹⁶⁹ members of the G.C.C. should also outlaw that group's aliases and affiliates.

The U.S. could also garner appreciation by designating certain groups that our Gulf allies consider terrorists but that we have not yet designated as such. The U.S. has not designated Saraya al-Ashtar, an I.R.G.C.-sponsored terrorist group that seeks to overthrow the government of Bahrain. Since the U.S. has already designated individual leaders of Saraya al-Ashtar, this should not be too difficult a step.¹⁷⁰

The U.S. should also consider whether the Iranian-backed Houthi movement in Yemen meets the criteria for designation as a terrorist group. Not only does the group's motto include the phrase "death to America, death to Israel, damn the Jews," but it has also been firing rockets at civilian areas deep into Saudi territory as well as at civilian ships in the Red Sea.¹⁷¹

2. Find Additional Ways to Combat Iran's Sponsorship of Terror

The U.S. should also seek other ways to cooperate financially with our Gulf allies against Iranian terror sponsorship.

¹⁶⁹ U.S. State Department, "Amendments to the Terrorist Designation of Lashkar e-Tayyiba," April 2, 2018. (<https://www.state.gov/r/pa/prs/ps/2018/04/280125.htm>)

¹⁷⁰ Tzvi Kahn & David Andrew Weinberg, "U.S. Sanctions Bahrainis Linked to Iran-Backed Group," *Foundation For Defense of Democracies*, March 22, 2017. (<http://www.defenddemocracy.org/media-hit/tzvi-kahn-us-sanctions-bahrainis-linked-to-iran-backed-group/>)

¹⁷¹ Bruce Riedel, "What You Need to Know About the Latest Houthi Attack on Riyadh," *Brookings*, March 27, 2018. (<https://www.brookings.edu/blog/order-from-chaos/2018/03/27/what-you-need-to-know-about-the-latest-houthi-attack-on-riyadh/>)

Most notably, the Chairman and Ranking Member of this full Committee have introduced legislation that should be a model for joint action against Iran's I.R.G.C. The Iranian Revolutionary Guard Corps Economic Exclusion Act (H.R. 5132) would broaden U.S. sanctions against economic entities controlled by Iran's I.R.G.C. and the foreign entities with whom they do business.

The Anti-Defamation League endorses this legislation and will be lobbying for it when we bring volunteers to Capitol Hill next month.

America's Gulf allies have economic leverage that they could use to dissuade companies in Europe and East Asia from enriching companies that are controlled by the I.R.G.C.¹⁷² The U.S. can encourage Gulf governments to use this influence in such areas as the energy and petrochemical industries, construction contracting, and sovereign wealth fund investments to impose effective secondary sanctions of this sort. Further, the U.S. can help the G.C.C. states implement such sanctions by identifying those I.R.G.C.-controlled entities that international firms should avoid.

The U.S. should also urge Dubai and Kuwait to stop granting access to Iran's terrorist-enabling Mahan Airlines, not least because failing to do so has already exposed service-providers in those locations to the possible risk of U.S. sanctions.

The U.S. should also clear up existing uncertainty about whether or not Oman is permitting Iranian weapons smuggling across its land and sea borders. If so, then transparency would create added urgency to resolve the issue. And if not, then Muscat deserves a clean bill of health.

Lastly, the U.S. should work with Abu Dhabi to limit opportunities for Iranian sanctions-busting via Emirati territory, subjecting economic free zones in the U.A.E.'s smaller emirates to stronger federal or international oversight.

3. Dry Up Terrorist Safe Havens

Terrorists continue to enjoy safe havens in several U.S. allied countries. America can and should do more to persuade these governments to turn over a new leaf.

One natural tool U.S. officials have at their disposal is the bully pulpit. They can highlight and condemn terrorist safe havens in public remarks and to the press. They can do so through international forums, such as the Trump administration's recent efforts to place Pakistan on a watch list of the Financial Action Task Force for

¹⁷² David Andrew Weinberg & Mark Dubowitz, "Where Obama Fails on Iran Sanctions, the Gulf States Can Step In," *Wall Street Journal*, February 21, 2016. (<https://www.wsj.com/articles/where-obama-fails-on-iran-sanctions-the-gulf-states-can-step-in-1456096639>)

terror finance negligence.¹⁷³ The U.S. can also declassify intelligence to expose embarrassing details about the activity of terrorist operatives in these safe havens.

The next secretary of state is unlikely to designate such countries as state sponsors of terrorism, but he or she can still do a more honest and accurate job in providing annual evaluations as to which foreign governments are in violation of Section 6(j) of the Export Administration Act. This statute requires the secretary to identify any foreign government that tolerates part of its territory being used by terrorist operatives to conduct training, recruitment, financing, or other terrorist activities.

With regard to Hamas safe havens, there is clearly one G.C.C. state that should be listed by Foggy Bottom. Listing Qatar as the law requires under Section 6(j) of the E.A.A. would impose licensing for exporting certain dual use goods the U.S. wouldn't want falling into hands of terrorists anyway, such as advanced rocket equipment, cyberattack technology, and precursors for weapons of mass destruction.

Finally, Congress should pass the Palestinian International Terrorism Support Prevention Act (H.R. 2712), which A.D.L. endorsed last year. With this bill, Congress would be authorizing additional penalties against those governments that provide material support to Hamas or Palestinian Islamic Jihad.

Members of Congress from both parties have written at least six separate letters to the executive branch or the Qatari embassy in Washington since 2013 raising concern about Hamas's operational presence in Qatar, including as recently as two such letters in November.¹⁷⁴ U.S. concern over this issue will not – and should not – go away, and action is needed now more than ever.

¹⁷³ Salman Masood, “*At U.S. Urging, Pakistan to Be Placed on Terrorism-Financing List*,” *New York Times*, February 23, 2018. (<https://www.nytimes.com/2018/02/23/world/asia/pakistan-terror-finance-list.html>)

¹⁷⁴ Letter led by Reps. Peter Roskam and John Barrow to Qatari Ambassador to Washington Mohamed al-Rumaihi, August 2, 2013, accessed April 23, 2018. (https://roskam.house.gov/sites/roskam.house.gov/files/roskam_qatar.pdf); Letter from Rep. Peter Roskam to Secretary of State John Kerry and Treasury Secretary Jack Lew, July 31, 2014, accessed April 23, 2018. (<https://roskam.house.gov/sites/roskam.house.gov/files/Roskam%20Qatar.pdf>); Letter led by Reps. Ros-Lehtinen, Deutch, Poe, and Sherman to Treasury Under Secretary for Terrorism and Financial Intelligence David Cohen, December 9, 2014, accessed April 23, 2018. (<https://ros-lehtinen.house.gov/sites/ros-lehtinen.house.gov/files/12.09.14%20-%20Joint%20MENA,%20TNT%20Letter%20to%20Treasury%20-%20Hamas,%20Turkey,%20Qatar%20Designations.pdf>); Letter from Reps. Peter Roskam and Brad Sherman to Treasury Secretary Jack Lew, December 10, 2014, accessed April 23, 2018. (https://roskam.house.gov/sites/roskam.house.gov/files/RoskamSherman_Letter%20to%20SecLew%20re%20Qatar.pdf); Letter led by Reps. Josh Gottheimer and Ron DeSantis to Treasury Secretary Steven Mnuchin, November 20, 2017, accessed April 23, 2018. (<https://gottheimer.house.gov/uploadedfiles/201711201638.pdf>); Letter led by Reps. Brad Schneider and Robert Pittenger to U.S. Ambassador to the United Nations Nikki Haley, November 21, 2017, accessed April 23, 2018. (<https://schneider.house.gov/sites/schneider.house.gov/files/Letter%20to%20Ambassador%20Haley%20on%20US%20Policy%20Toward%20Qatar.pdf>)

4. End the Impunity of Violators

Related to the issue of drying up terrorist safe havens is the imperative of ending the impunity of terror financiers throughout the Gulf, something all six G.C.C. states already pledged under the 2014 Jeddah Communiqué. In those instances in which Gulf governments provide no evidence they plan to bring local terror financiers to justice, it is up to the U.S. and the international community to act.

Just as the U.S. pursues legal action against other kinds of terrorist operatives, the U.S. should identify those cases in which it can indict senior terror financiers who enjoy legal impunity abroad and seek their extradition. Doing so may help punish violators, deter future crimes by them or by others, and can add pressure on permissive jurisdictions to fix their conduct, all while bolstering the rule of law.

Members of this Committee have previously written that the U.S. uses this tool far too rarely with regard to the dozens of instances in which Palestinian terrorists have killed or wounded American citizens,¹⁷⁵ albeit with some recent exceptions.¹⁷⁶ For example, last year the U.S. unsealed criminal charges filed in 2013 against an accomplice to the 2001 Hamas bombing of a Sbarro pizzeria in Jerusalem that killed two U.S. citizens and injured seven U.S. citizens, among the many other victims.¹⁷⁷ The U.S. added that woman to the F.B.I.'s list of Most Wanted Terrorists and filed a warrant for her arrest. Like Hussam Badran, she was freed as part of the Gilad Shalit prisoner deal and reportedly resumed her support for Hamas from abroad.¹⁷⁸

As one of the alleged masterminds of that Sbarro pizzeria attack, Hussam Badran could also be a natural target for such public U.S. legal action. According to the Israeli government, he also directed the 2002 Passover bombing at the Park Hotel in

¹⁷⁵ United States House of Representatives: Committee on Foreign Affairs, "Reps. Walsh and Berman Send Bipartisan Letter," *United States House of Representatives: Committee on Foreign Affairs*, March 1, 2012. (<https://democrats-foreignaffairs.house.gov/news/press-releases/rebs-walsh-and-berman-send-bipartisan-letter>)

¹⁷⁶ Office of Public Affairs, "Individual Charged in Connection With 2001 Terrorist Attack in Jerusalem That Resulted in Death of Americans," *The United States Department of Justice*, March 14, 2017. (<https://www.justice.gov/opa/pr/individual-charged-connection-2001-terrorist-attack-jerusalem-resulted-death-americans>)

Office of Public Affairs, "Two Terrorists Charged in Connection With the 2010 Murder of a U.S. National in Israel," *The United States Department of Justice*, April 13, 2017. (<https://www.justice.gov/opa/pr/two-terrorists-charged-connection-2010-murder-us-national-israel>)

¹⁷⁷ Office of Public Affairs, "Individual Charged in Connection With 2001 Terrorist Attack in Jerusalem That Resulted in Death of Americans," *The United States Department of Justice*, March 14, 2017. (<https://www.justice.gov/opa/pr/individual-charged-connection-2001-terrorist-attack-jerusalem-resulted-death-americans>)

¹⁷⁸ Khaled Abu Toameh, "Female Terrorist Hosts Talk Show on Hamas TV," *Jerusalem Post*, March 1, 2012. (<http://www.jpost.com/Middle-East/Female-terrorist-hosts-talk-show-on-Hamas-TV>)

Netanya, which killed another American citizen.¹⁷⁹ In addition, he may be vulnerable to civil suits by the families of these victims.

Similarly, it could make sense for U.S. officials to file indictments and seek the extradition of some of those U.S.-designated al-Qaeda financiers who are enjoying legal impunity in the Gulf.

However, the challenge in those cases would be to identify instances in which the crimes of these terrorist facilitators are subject to U.S. jurisdiction. Yet even in the absence of U.S. legal standing, Washington can take other steps to build pressure for legal action against these individuals, not least by drawing public attention to such cases and by issuing forceful U.S. condemnations of their legal impunity more often.

5. Stop State Ransoms to Terrorists

The money that foreign terrorist organizations are making from ransoms payments has skyrocketed in the past decade, and state ransoms from some governments in the Gulf and in Europe have played a large part. Yet when the Obama administration updated its strategy for hostage recovery last year, it did not articulate a matching strategy for deterring these foreign government payments of terrorist ransoms.¹⁸⁰

As such, there is more that can be done in this regard. Most notably, the U.S. should shine a bright light on those governments that engage in this understandable but destructive and illegal practice.

For example, Section 709 of Public Law 114-323 (the Department of State Authorities Act Fiscal Year 2017, which was passed in December 2016) required the executive branch to submit a report within 90 days indicating “which foreign governments are believed to have facilitated, directly or indirectly, the payment of ransoms” in the last year as well as details about those suspected transactions.¹⁸¹

Yet a year has elapsed without the administration fulfilling its obligation under this law. Chairman Poe, your letter last month to Treasury Secretary Mnuchin urging him to explain why this deadline was not met and to give a timeline for its submission was an important action that deserves more attention.¹⁸² Congress should keep urging the administration to fulfill this obligation and should pass new legislation to make such reporting a regular requirement instead of a one-time duty.

¹⁷⁹ Olsen Attorneys At Law, LLC, “United States District Court Eastern District of New York,” *Olsen Attorneys At Law*, June 17, 2016. (https://www.osenlaw.com/sites/default/files/06-17-16_Strauss_Fifth_Amended_Complaint_ECF.pdf)

¹⁸⁰ David Andrew Weinberg, “What To Do About the Kidnapping For Ransom Problem,” *The Hill*, November 17, 2015. (<http://thehill.com/blogs/congress-blog/foreign-policy/260374-what-to-do-about-the-kidnapping-for-ransom-problem>)

¹⁸¹ S.1635 - Department of State Authorities Act, Fiscal Year 2017, (<https://www.congress.gov/bill/114th-congress/senate-bill/1635/text>)

¹⁸² Letter from Representative Ted Poe to Secretary of the Treasury Steven Mnuchin, March 13, 2018.

6. Boost Government Capacity

The United States cannot effectively quarterback its policies in the Gulf without ambassadors on the ground. As such, the administration must finally nominate ambassadors to fill longstanding vacancies in Saudi Arabia and Qatar, as well as the new vacancy that recently opened up in the United Arab Emirates.

The U.S. should also continue technical assistance to boost the counter terror finance capacities of our Gulf allies. That includes bilateral and multilateral training programs, helping to boost the authorities of local counter terror finance institutions, and even embedding U.S. officials in relevant local institutions when permitted. But we should never confuse a lack of capacity in some instances in the Gulf with a lack of will, which is so obviously manifest in some others.

7. While Addressing the Gulf Standoff, Prioritize U.S. interests

Undoubtedly, the U.S. should exert some degree of effort to heal the rift that has emerged among our Gulf partners. But a diplomatic solution for its own sake is not in U.S. interests. Rather, the U.S. should make sure that any steps it takes in addressing the Gulf standoff also address key U.S. concerns about terrorist safe havens and terrorist finance. That was one of the main reasons this crisis erupted in the first place, and if these problems are not resolved now, they may never be.

As such, the executive branch should give the public and the press a more transparent assessment of what Qatar has and has not pledged under its bilateral terror finance M.o.U., as well as the extent to which it is or is not implementing those commitments. None of the other participants in this dispute should get a free pass, either. Kuwait, the dispute's main mediator, should be held accountable for allowing U.S.- and U.N.-designated terror financiers to operate openly or to work in public sector positions of authority. Saudi Arabia, the U.A.E., and Bahrain should be urged to further differentiate themselves from other countries in their neighborhood by improving their terrorist designation lists, including by outlawing Hamas.

The U.S. should also review the designations of individual terror financiers issued by the anti-Qatar quartet over the last year to assess whether any of those individuals not under U.S. sanctions should also be designated by the United States. Although some of the more politicized entries on this list certainly do not meet U.S. legal standards for designation, some other entries might. Even Qatar itself has recently sanctioned several of its own citizens who had been designated by the Arab quartet but are not currently under U.S. sanctions.

Lastly, the U.S. should take steps to insulate counter terror finance cooperation from the ongoing Gulf standoff, which could linger on for years to come. For example, the

U.S. should work toward ensuring that Qatari officials are finally permitted to take their seats at the joint Terror Finance Targeting Center in Riyadh.¹⁸³

8. Address The Ideological Underpinnings of Terror Finance

The U.S. government's first terrorist finance czar Stuart Levey wrote in 2010 that stopping terrorist finance requires not just ending the impunity of violators but also preventing people from embracing such support for terrorism in the first place. He explained that "unless the next generation of children is taught to reject violent extremism, we will forever be faced with the challenge of disrupting the next group of terrorist facilitators and supporters."¹⁸⁴

As such, the U.S. government must work intensively with its Gulf partners to end incitement in state-backed media outlets, by state-backed religious officials, and in state-sponsored school textbooks. Doing so is a crucial part of achieving the goal President Trump identified during his speech to Arab and Islamic leaders last year in Riyadh: combating terrorism and the extremism that inspires it.¹⁸⁵

¹⁸³ Ian Talley & Gordon Lubold, "The Real Danger in Qatar-Gulf Feud is Iran, U.S. Officials Say," *Wall Street Journal*, April 10, 2018. (<https://www.wsj.com/articles/u-s-worries-qatar-rift-is-pushing-emirate-toward-iran-1523391182>)

¹⁸⁴ Stuart A. Levy, "Loss of Moneyman a Big Blow for Al-Qaeda," *The Washington Post*, June 6, 2010. (<http://www.washingtonpost.com/wp-dyn/content/article/2010/06/04/AR2010060404271.html>)

¹⁸⁵ White House "President Trump's Speech to the Arab Islamic American Summit," May 21, 2017. (<https://www.whitehouse.gov/briefings-statements/president-trumps-speech-arab-islamic-american-summit/>)