USE OF SOCIAL MEDIA BY TERRORIST FUNDRAISERS & FINANCIERS

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EXECUTIVE SUMMARY

Financiers and fundraisers for al-Qaida and Islamic State (ISIS) are active users of popular social media platforms, such as Facebook, Twitter, YouTube and Instagram, in some cases even after being placed on a United Nations or US government sanctions list. Terrorist financiers and fundraisers have utilized social media to attract and direct funding to procure weapons, pay salaries, strengthen infrastructure and operate civil and social services. While the amount of funding raised via social media is far less in comparison to revenues from oil sales or taxation, al-Qaida and ISIS fundraisers have taken credit for millions of dollars raised using social media-based campaigns—significant amounts by any standard.

Terrorist financiers and fundraisers for al-Qaida and ISIS have relied on social media services to communicate with colleagues and supporters, attract new followers globally, and promote aligned causes and organizations. With their potential to spur viral content growth, social media services enable fundraisers to more quickly and effectively solicit support and reach larger audiences.

Social media companies have actively terminated the accounts of terrorist facilitators—including a number of designated terrorist fundraisers and financiers—citing violations of their respective terms of service restrictions that prohibit support for violence or hate speech [see pg.12]. For example, in early February 2016 Twitter announced the closure of more than 125,000 accounts “for threatening or promoting terrorist acts, primarily related to ISIS,” noting that social media platforms are “forced to make challenging judgment calls based on very limited information and guidance.”1 Facebook has also stepped up its efforts to remove users who back terror groups, and YouTube has taken down content and terminated users who post terrorist material.2

The success of efforts to disrupt the use of social media services by terrorist financiers and fundraisers, however, has been restrained by the following:

- account closures have focused on users who advocate for violence or promote terrorism, but not sufficiently on the networks of terrorist fundraisers and financiers;
- violators of the terms of service may quickly reestablish new social media accounts, replacing suspended accounts on the same social media platform; and
account closures have been carried out ad-hoc per the terms of service enforcement of each social media platform, but uncoordinated among the various social media service providers.

While terrorist financiers and fundraisers lose access to their bank accounts after designation, in many cases, they are still able to maintain and establish new social media accounts, often on the same social media platforms they used for their terrorist fundraising activities. For example, as of early April 2016, US and UN designated terrorist Hajjaj Fahd al-Ajmi maintains active social media accounts on multiple platforms, including an Instagram account with more than 1.3 million followers. Hajjaj al-Ajmi has used his popular Instagram account as a source of revenue after his designation, posting advertisements for local businesses and soliciting sales and marketing posts.

Terrorist financiers and fundraisers that use or have used social media leave behind a record of activities that reveals fundraising co-facilitators and provides a foundation for network analysis. Targeting these networks for social media account closures can amplify the disruptive impact on terrorist fundraising, communication and support activities.

To more effectively disrupt terrorist financiers and their networks of co-facilitators, social media service providers should consider the following options:

- Ensure effective utilization of the UN and US sanctions lists to block accounts held by individuals and entities subject to these authorities.

- Identify and block accounts of co-facilitators that are associated with fundraising activities of designated terrorists.

- Ensure that designated terrorist financiers and their fundraising co-facilitators whose accounts are suspended are prevented from establishing new accounts.

- Share information, in real time, with other social media service providers on accounts of terrorist financiers, fundraisers and co-facilitators that have been blocked.
USE OF SOCIAL MEDIA BY TERRORIST FUNDRAISERS & FINANCIERS

The use of social media platforms by terrorist financiers and fundraisers is often overlooked. Public attention on the use of social media by terrorist organizations mostly focuses on support for violence, radicalization and recruitment activities. This emphasis has been particularly acute in the wake of ISIS’s recruitment of foreign fighters for the ongoing conflicts in Syria and Iraq, and the recent attacks by terrorist cells in Brussels, Paris and San Bernardino.

Why Terrorists Fundraisers & Financiers Use Social Media

- Communicate with colleagues and supporters
- Attract new followers
- Promote causes and organizations
- Carry out fundraising campaigns that benefit terrorist organizations

Rather than encourage sympathizers to take up arms, financiers and fundraisers for al-Qaida and ISIS have used social media to promote a “financial jihad,” urging followers to donate funds in support of operational activities of terrorist organizations, other affiliated militant groups and aligned causes.

In March 2014, the US Treasury Department pointed to the use of social media by terrorist financiers to solicit donations that benefit al-Qaida’s al-Nusra Front and ISIS.3 Shortly afterwards in early August 2014, the US government designated individuals it named as “key terrorist financiers” who “play key roles in the external financing and facilitation of terrorists in Syria and Iraq.”6 Speaking to the designation of these terrorist financiers, the Under Secretary of Treasury for Terrorism and Financial Intelligence said: “Through fundraising appeals on social media and the use of financial networks, Shafi al-Ajmi, Hajjaj al-Ajmi, and [Abd al-Rahman Khalaf] al-Anizi have been funding the terrorists fighting in Syria and Iraq.”

When leveraging social media platforms, financiers and fundraisers for al-Qaida and ISIS have been supported by and operate among networks of co-facilitators that aid or extend their fundraising initiatives. US and UN designated terrorist financiers Shafi al-Ajmi, Hajjaj al-Ajmi and Abd al-Rahman al-Anizi, for example, instructed donors to

“Over the past few years, charitable fundraising networks in the Gulf have collected hundreds of millions of dollars through regular fundraising events held at homes or mosques and through social media pleas. These networks then use couriers, wire transfers, hawalas, and exchange houses to move those funds to Syria, often to extremists... Constraining this flow of funds is particularly challenging in an era when social media allows anyone with an Internet connection to set himself up as an international terrorist financier... Innovations in traditional modes of terrorist fundraising, particularly through the use of social media, will continue to pose new challenges. As we have seen in the context of Syria, fundraisers can now use social media handles instead of face-to-face solicitations, and sympathetic donors can bypass a risky rendezvous in favor of a simple and remote hashtag search.”

REMARKS OF UNDER SECRETARY FOR TERRORISM AND FINANCIAL INTELLIGENCE
DAVID COHEN,
MARCH 4, 2014
contact their respective networks of co-facilitators to provide support for their fundraising beneficiaries. These co-facilitators remained active on multiple social media platforms—including Twitter, Facebook, Instagram, and YouTube—after their designated associates were sanctioned and continued to use their social media profiles to solicit donations.7

**SOCIAL MEDIA CAMPAIGNS CO-LED BY SANCTIONED AL-QAIDA FINANCIERS & CO-FACILITATORS**
A review of the use of social media platforms by designated financiers and fundraisers for al-Qaida and ISIS demonstrates the significance they associate with their social media presence, as well as the impact their fundraising activities have in providing material support to terrorist groups and affiliated organizations in conflict areas such as Syria and Iraq. These examples also demonstrate how in some cases, terrorist financiers and fundraisers are able to continue leveraging the most popular social media platforms even after they are targeted by US and UN sanctions.

**Hajjaj Fahd al-Ajmi**

In August 2014, the US government and the UN designated Hajjaj Fahd al-Ajmi [Fig. 1] as a terrorist financier for al-Qaida, stating:

“Hajjaj al-Ajmi serves as a funnel for financial donations to [al-Nusra Front] facilitators in Syria, traveling regularly from Kuwait to Syria to engage in financial activity on behalf of [al-Nusra Front] and deliver money to the group. He agreed to provide financial support to [al-Nusra Front] in exchange for installing Kuwaitis in [al-Nusra Front] leadership positions. In early January 2014, he offered [al-Nusra Front] money to lead a battlefield campaign in Homs, Syria.”

Prior to the designation, Hajjaj al-Ajmi’s fundraising activities for al-Qaida in Syria were displayed on Twitter accounts operated by the terrorist organization. For example, in August 2013, an al-Nusra Front media office directed supporters to send donations through Hajjaj al-Ajmi for operations on the Syrian coast. Donors were instructed to contact Hajjaj al-Ajmi directly through his Twitter account [Fig. 2].

In June 2012, approximately two years prior to his designation as an al-Qaida fundraiser, Hajjaj al-Ajmi established a fundraising organization called the “Popular Commission in Support of the Syrian Revolution” [Fig. 3]. The Popular Commission solicited funds through its own Twitter account and Hajjaj al-Ajmi’s personal Twitter account for the purchase of weapons and artillery in support of jihadist groups in Syria. By mid-2013, the Popular Commission “raised hundreds of thousands of dollars to finance Syrian rebel groups,” according to media reports.

In mid-2013, approximately one year prior to his designation as an al-Qaida fundraiser, Hajjaj al-Ajmi helped launch the “Mobilization of the People of Qatar Campaign for the Levant” (Fazat Ahl Qatar Lel Sham) to raise funds for jihadist fighters in Syria [Fig. 4]. Solicitations for this...
campaign included contact information for his fundraising co-facilitators who also used their social media accounts to assist Hajjaj al-Ajmi’s fundraising initiatives.

To encourage support for his fundraising efforts, Hajjaj al-Ajmi and his network of co-facilitators used their social media profiles to distribute statements and videos of Syrian militias thanking Hajjaj al-Ajmi and his supporters for their donations. For example, in August 2013 Hajjaj al-Ajmi’s Popular Commission published a statement by a Commander of a Syrian militia thanking Hajjaj al-Ajmi and his donors for funding the Coastal Operations Center—a coordination cell that was established for the planning and execution of operations by al-Nusra Front and ISIS, among other militias.\(^\text{13}\)

In appreciation for Hajjaj al-Ajmi’s fundraising efforts, a rebel group in eastern Syria posted a YouTube video in mid-2013 thanking Hajjaj al-Ajmi for his support and renaming itself the “Hajjaj al-Ajmi Brigade” [Fig. 5].\(^\text{14}\)

In late 2013, still almost one year prior to his designation as an al-Qaida fundraiser, Hajjaj al-Ajmi used Instagram and Twitter to post videos evidencing his support to militants in Syria [Fig. 6].\(^\text{15}\)

In August 2014, Twitter suspended the account of Hajjaj al-Ajmi after the US government placed him on an al-Qaida sanctions list.\(^\text{16}\) However, within hours of his account suspension, Hajjaj al-Ajmi successfully created a new account bearing his name and image.

Associates of Hajjaj al-Ajmi published the new Twitter handle for the designated al-Qaida fundraiser with instructions to follow the new account. Supporters of Hajjaj al-Ajmi circulated the hashtag “#Campaign_for_a_million_followers_for_Hajjaj_AlAjmi” which helped him regain many of his followers. Within two days, Hajjaj al-Ajmi recouped nearly 42,000 followers, and as of early April 2016, Hajjaj al-Ajmi’s new Twitter account was still active and had garnered more than 176,000 followers.\(^\text{17,18}\)

While Twitter suspended his original account after his designation, Hajjaj al-Ajmi’s other social media accounts were uninterrupted and remain active as of early April 2016. For example, on his Instagram page—followed by more than 1.3 million accounts—Hajjaj al-Ajmi posts advertisements for local businesses and solicits marketing opportunities as a source of revenue after his designation by the UN and US government [Fig. 7].\(^\text{19}\)

The Popular Commission in Support of the Syrian Revolution, which was founded and led by Hajjaj al-Ajmi, remains active. The Popular
Commission solicits donations via Twitter for Syria, Gaza and Yemen, although Hajjaj al-Ajmi no longer appears on its fundraising solicitations. Immediately after the designation of Hajjaj al-Ajmi and the suspension of his Twitter account, the Popular Commission distributed a message on Twitter encouraging its followers to follow Hajjaj al-Ajmi’s new Twitter account.

In October 2015—more than a year after being named by the US government as a terrorist financier—Hajjaj al-Ajmi announced the launch of a new account on the social media service Snapchat [Fig. 8].

**Abd al-Rahman Khalaf al-Anizi**

In August 2014, the US government designated Abd al-Rahman Khalaf al-Anizi as an ISIS financial facilitator, stating:

> "Since at least 2008, al-Anizi worked with a senior ISIL facilitator and ISIL financial official to transfer funds from Kuwait to Syria. He also worked with an ISIL facilitator to pay for the travel of foreign fighters moving from Syria to Iraq. Al-Anizi worked to smuggle several foreign fighters from Kuwait to Afghanistan, likely to join al-Qaeda and was involved in extremist facilitation activities with Iran-based al-Qaeda facilitators, including the movement of extremists to Afghanistan via Iran."

On behalf of ISIS, Abd al-Rahman al-Anizi received funding from Talib Falah al-Fadl al-Shammari and his social media-based Al-Khair fundraising campaign, according to Kuwaiti authorities who arrested and sentenced members of this network in 2015. As of early April 2016, the Al-Khair campaign’s Twitter account is still active and soliciting donations; however, the campaign no longer identifies convicted ISIS facilitator Talib Falah al-Fadl al-Shammari as its supervisor [Fig. 9/Fig. 10].

- In mid-2015, Kuwaiti authorities sentenced five individuals to 10 year prison sentences for forming an ISIS recruitment and fundraising cell. One of the convicted ISIS cell members, Talib Falah al-Fadl al-Shammari, admitted in court proceedings to facilitating the transfer of 50,000 euros to ISIS financial facilitator Abd al-Rahman al-Anizi in June 2014, according to local media reports of the trial. Other cell members admitted to transferring more than $400,000 in donations to ISIS since 2012 under the false pretext of providing humanitarian supplies to refugees, according to local media reporting.
Al Rahma Welfare Organization

On March 31, 2016, the U.S. and Saudi governments jointly designated the Pakistan-based Al Rahma Welfare Organization (RWO) and its leader James Alexander McLintock (aka “Yaqoob Mansoor al-Rashidi”) for providing support to al-Qaida, the Taliban and Lashkar-e-Taibah. Under the false guise of charity, James McLintock set up RWO as a front organization to finance militant activities for al-Qaida and other extremist groups from donors in the United Kingdom, the Persian Gulf, and elsewhere. According to the US designation:

“Since May 2012, McLintock has provided support to the Taliban by using RWO and his other non-governmental organizations (NGOs) to receive large amounts of money from British donors who were not aware of the NGOs’ Taliban ties. According to publicly available information, between April 2011 and April 2012 RWO received the equivalent of approximately $180,000 from donors in the United Kingdom. RWO has also received financial support from charities in the Persian Gulf and the United Kingdom.”27

RWO and James McLintock relied on social media to support their global terrorist fundraising activities from their base in Pakistan, posting instructions for donors on how to transfer funds to bank accounts for the organization in Pakistan and the UK (Fig. 11).28

The Facebook and Twitter accounts for RWO and James McLintock remain active, soliciting donations as of early April 2016 (Fig. 12/Fig. 13/Fig. 14).29

Khalifa Muhammad Turki al-Subaiy

In 2008, the US government and UN sanctioned Khalifa Mohammed Turki al-Subaiy for providing financial support to senior al-Qaida leadership, including 9/11 planner Khalid Sheikh Mohammed.30 Khalifa al-Subaiy continued to be active in financing al-Qaida after his designation, according to subsequent US government statements released in September 2014.31

Khalifa al-Subaiy maintains active profiles on Twitter, Facebook and Instagram (Fig. 15/Fig. 16). Khalifa al-Subaiy has used these social media platforms to communicate with followers and endorse fundraising campaigns, among other activities.

In a Facebook post from 2013, Khalifa al-Subaiy solicited donations on behalf of a fundraising campaign for Syria—the head of the campaign, Saad bin Saad al Kabi, was subsequently designated by the US government as an al-Qaida financier (Fig. 17).32 Khalifa al-Subaiy also
appeared in a fundraising video for the campaign that was posted on YouTube and distributed on Twitter and Facebook.

Hamid bin Abdullah al-Ali

In 2006 and 2008, the US government and the UN, respectively, designated Hamid bin Abdullah al-Ali for providing support to al-Qaida groups seeking to commit terrorist attacks against US forces in Iraq, Kuwait and elsewhere. According to the 2006 US government designation:

‘Al-Ali Provides Support for al-Qaida in Iraq

Evidence shows that Al-Ali’s efforts include providing support for terrorist organizations, including those in Iraq. Al-Ali recruits jihadists in Kuwait for terrorist activity including for al-Qaida in Iraq. Al-Ali has provided financial support for recruits, including paying for their travel expenses to Iraq...

Other Information

Separate from the financial and other services in support of terrorist groups for which Al-Ali is being designated, he has issued fatwas legitimizing suicide operations. One such fatwa sanctions “the permissiveness, and sometimes necessity, of suicide operations, on the condition of crushing the enemy ... or causing moral defeat to the enemy, to obtain victory.” According to this fatwa, “In modern time(s) this can be accomplished through the modern means of bombing, or by bringing down an airplane on an important site that causes the enemy great casualties.”

As of early April 2016, Hamid bin Abdullah al-Ali maintains active social media accounts on Twitter and Facebook [Fig. 18/Fig. 19] where he has advocated for terrorist groups, such as al-Qaida, and terrorist financiers, such as Hajjaj al-Ajmi and Shafi al-Ajmi [Fig 20].
PREVENTING TERRORIST FINANCIERS FROM LEVERAGING SOCIAL MEDIA

Social media service providers have established policies that prohibit the use of their platforms by terrorists and prohibit the promotion of terrorism or violence. Such policies and procedures, however, could be effectively enforced to identify and block activities of terrorist financiers and their networks of co-facilitators. For example, the activities of terrorist financiers may not trigger the same filtering tools that social media companies use to flag violent content for review.

Illicit actors operate through complex networks of fundraising co-facilitators and financiers. Understanding how these networks operate is key to combating their activities on social media. Terrorist financiers and fundraisers that use or have used social media leave behind a record of activities that reveals fundraising co-facilitators and provides a foundation for network analysis. Targeting these networks for social media account closures can amplify the disruptive impact on terrorist fundraising, communication and support activities.

Recommendations:

To identify and block the accounts of designated terrorist financiers and their fundraising co-facilitators, social media companies should consider implementing tailored programs that:

- Ensure effective utilization of the UN and US sanctions lists to block accounts held by individuals and entities subject to these authorities.

- Identify and block accounts of co-facilitators that are associated with fundraising activities of designated terrorists.

- Ensure that designated terrorist financiers and their fundraising co-facilitators whose accounts are suspended remain blocked from establishing new accounts.

- Share information, real time, with other social media service providers on accounts of terrorist financiers, fundraisers and co-facilitators that have been blocked.
Twitter Abusive Behavior Policy:

“In order to ensure that people feel safe expressing diverse opinions and beliefs, we do not tolerate behavior that crosses the line into abuse, including behavior that harasses, intimidates, or uses fear to silence another user’s voice... You may not make threats of violence or promote violence, including threatening or promoting terrorism.”

Facebook Terms of Service:

“We do our best to keep Facebook safe, but we cannot guarantee it. We need your help to keep Facebook safe, which includes the following commitments by you: You will not post content that: is hate speech, threatening, or pornographic; incites violence; or contains nudity or graphic or gratuitous violence.”

December 8, 2015

Facebook Response to Public Petition:

“There is no place on Facebook for terrorists, terrorist propaganda or the praising of terror. Our Community Standards make this clear and we work aggressively to ensure that we do not have terrorists or terror groups using the site. Our goal is to give people a place to share and connect with one another. For that to happen, they need to know we are working to keep them safe on Facebook. That’s why we have strict rules that outline what is not acceptable. This includes our clear ban on anything that promotes terrorism... We remove anyone or any group who has a violent mission or who has engaged in acts of terrorism. We also remove any content that expresses support for these groups or their actions. And we don’t stop there. When we find terrorist related material, we look for and remove associated violating content as well.”

Instagram Community Guidelines:

“Instagram is not a place to support or praise terrorism, organized crime, or hate groups. Offering sexual services, buying or selling firearms and illegal or prescription drugs (even if it’s legal in your region) is also not allowed. Remember to always follow the law when offering to sell or buy other regulated goods.”

December 2015

Statement by YouTube on Combating Terrorist Use

“YouTube rejects terrorism and has a strong track record of taking swift action against terrorist content. We have clear policies prohibiting terrorist recruitment and content intending to incite violence and quickly remove videos violating these policies when flagged by our users. We also terminate accounts run by terrorist organizations or those that repeatedly violate our policies. We allow videos posted with a clear news or documentary purpose to remain on YouTube, applying warnings and age-restrictions as appropriate.”

WhatsApp Terms of Service:

“You affirm that you are either more than 16 years of age, or an emancipated minor, or possess legal parental or guardian consent, and are fully able and competent to enter into the terms, conditions, obligations, affirmations, representations, and warranties set forth in these Terms of Service, and to abide by and comply with these Terms of Service... You further represent and warrant that you are not located in a country that is subject to a U.S. Government embargo, or that has been designated by the U.S. Government as a “terrorist-supporting” country, and that you are not listed on any U.S. Government list of prohibited or restricted parties.”
SOCIAL MEDIA ACCOUNTS OF DESIGNATED TERRORIST FINANCIERS
About Us

The Camstoll Group is a strategic advisory firm specializing in sanctions and illicit finance. With our global reach and proven financial intelligence platform, we provide financial institutions, multinational corporations, and governments with the unique insights and sound guidance required to understand and manage risk.

Camstoll’s senior management team consists of former officials from the US Treasury Department’s Office of Terrorism Financial Intelligence, together representing decades of combined experience in global illicit finance and financial intelligence.

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