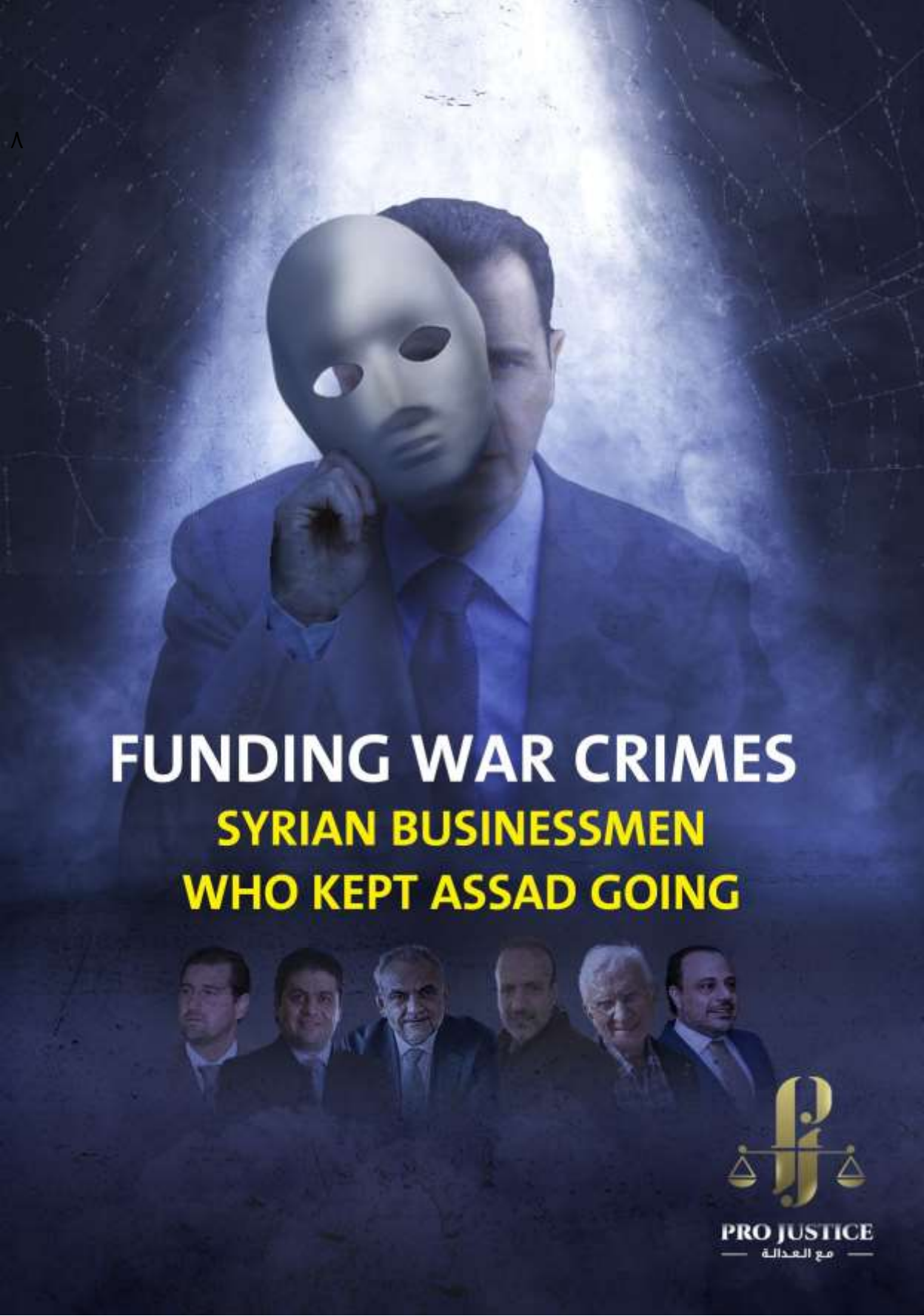

FUNDING WAR CRIMES
SYRIAN BUSINESSMEN
WHO KEPT ASSAD GOING
PRO JUSTICE
مع العدالة

FUNDING WAR CRIMES

SYRIAN BUSINESSMEN WHO KEPT ASSAD GOING



First Edition 2020

All rights reserved

First published in the US 2020 by Pro-Justice

8725 Ginger Snap Lane, San Diego, CA 92129

Email. info@pro-justice.org

Tel. 18588886410+

Copyright © Pro-justice

All rights reserved. No part of this publication may be reproduced, stored in any retrieval system or transmitted in any form or by any means without prior permission in writing of Pro-justice

Pro-justice is a non-profit that seeks to maintain the principle of accountability and preclude impunity for major war criminal and human rights violators in societies that suffer from or have just exited civil wars and natural disasters, with special focus on the Middles East and Syria.

Visit www.pro-justice.org to read more about pro-justice activities and publications

Table of Contents

Table of Contents 6
Introduction 10

Chapter 1:
How the regime circumvents international sanctions

II. The impact of international sanctions on the Syrian economy 24
III. Mechanisms used by the regime to circumvent international sanctions .31

Chapter 2:
Assad's network of businessman

Rami Mohamed Makhlouf 51
Iyhab Muhammad Makhluf 57
Khaldoun Adnan Makhluf 63
Hussam Ahmad Qaterji 67
Ayman Jaber 71
Fares Ahmad al-Shihabi 75
Samer Zuhair Foz 79
Amer Foz 85
Muhammad Saber Hamsho 89
Amjad Muhammad Douba 93
Samer Ali Duba 97
Majd Bahjat Suleiman 101
Mazen Samir al-Tarazi 107
Muhammad Bashar Kiwan 113
Salim Dib Da'bul 119
George Haswani 123

Khider Ali Taher 127
Nader al-Qala'i 131
'Adel Anwar al-'Ulabi 137
Bisher Mazen al-Sabban 141
Mohamad Al-Sawah 149

Ammar Al-Sharif 157
Tariff Abdul-Basset Al-Akhras 161

Mohammad Amer Shwaiki 169
Mohammad Hasan Abbas 173
Mazen Hani Murtada 175
Samer Al-Debs 177
Mohammad Samer Afdar 179
Wael Abdel Karim 183
Mohammad Murtada Al-Dandashi 187
Khaled Hbubati 191
Sulaiman Mahmoud Maarouf 195
Samir Anis Hasan 199
Wassim Anwar Quattan 203
Nizar Jamil As'ad 207
Mohammed Khaled Al-Zubaidi 211
Khalid Naser Kaddour 215
Yasir Aziz Abbas 219
Ali Wahib Marhi 223
Fahd Mahmoud Darwish 227
Nabil Toumeh 231
Mohammad Anas Talas 235
Salim Girgis Alton 239
Mohammad Labib Ikhwan 243
Anas Saifi 247

Hashim Anwar Al-Aqqad 249
Bade' Burhan Al-Droubi 253
Atiah Mtanius Khouri..... 255
Saeb Shafiq Nahhas 257
Mahran Khawanda 263
Mohammad Issam Mohammad Anwar Shammout 267
Adnan Al-Ali 271
© Copyright 2025 Pro-Justice- All Rights Reserved
Mohammad Khaled Mahjob 275
Yaamor Darwish Al-Zuni..... 279
Mohammad Ali Wahoud 281
Kami Raeef Hilal 285
Mohammed Rami Martini 287
Baraa Qaterji..... 291
Ahmed Nabil Al Kuzbari..... 297
Bilal Al-Naal 301
Muhammad Kaband..... 305

Introduction

Nine years after the revolution broke out in Syria, the country has entered a new phase where the war led by Bashar Al-Assad and his Russian and Iranian allies is becoming more intense and bloody, as the economic situation worsens, sending many into poverty and hunger.

Continuing to fall in value, the Syrian lira has reached about 3,000 to the US dollar in the black market, dragging down with it as much as 90% of Syrians living in of government-controlled areas.

Whether practically or morally speaking, the regime is primarily responsible for the state in which the country is in today, with its destructive policy, oppression and stubbornness to hold onto power. In addition to a long history of corruption and plundering of the country's wealth, of which complicit businesspersons drained the rest of in deals with the regime.

But the regime, with all of its institutions, army, security apparatuses and militias, was not the only one responsible for the torture, displacement and tragedy of the Syrian people. It could not have done it without the help of loyal businessmen whose funding ensured it stayed in power and who facilitated the illicit ways in which the regime was able to get around international sanctions.

With the help of Russian and Iranian allies, businessmen helped the regime maintain a steady supply of arms, ammunition and fuel in the face of sanctions through the establishment of counterfeit companies and other manipulative methods. Some of these businessmen were also directly complicit in the oppression, killing and displacement of Syrians through either funding militias or directly leading them in some cases.

Therefore, any war crimes or crimes against humanity committed by the regime must take into account the role played by these businessmen.

Hoping to achieve justice and accountability, we here, at Pro Justice, feel obliged to clarify some things and expose the role of all who were involved in crimes against the Syrian people, whether through direct war or corruption, impoverishment or siege.

This book comes as a follow up to "Blacklist: Violations Committed by the most Prominent Figures and How to Bring them to Justice", a volume we published last year in which we detailed the nature of the crimes that were committed by regime and security officials. This book now comes to document the sacrifices and suffering of the Syrian people as well as their struggle for their freedoms and ways to hold those responsible accountable.

The first chapter sheds light on the tools that were used by the regime to circumvent international sanctions, and suggests how those who facilitated these tools could be punished by international organizations.

The second chapter exposes the main businessmen who were complicit in crimes and violations committed by the Syrian regime for a clearer view of the circle that helped Bashar Al-Assad stay in power.

The purpose of this project is to stress that the regime's crimes will not expire with time and that international bargaining and side interests will not win over the people's demands for freedom, dignity and justice.

A great effort was exerted in the collection of this book's content, and we aim to follow up with other works in the future that continue to expose perpetrators, including sectarian and terrorist leaders, militia leaders and foreign organizations, that contributed to violations that breached all international and humanitarian convictions and principles.

Today we are giving Syrian people and civil society access to this information, hoping we could combine our efforts to achieve the legitimate demands of the Syrian people in bringing to justice those responsible for the state Syria is in.



Chapter 1:

How the regime circumvents international sanctions

Economic sanctions are defined as: “An economic measure aimed at influencing the will of a certain State, while exercising its rights, to compel it to respect its international obligations. Sanctions can be imposed by international organizations or States, targeting the commercial, industrial and financial interests of the State. They are a coercive measure applied as a punitive action to counteract breaches of international legal obligations. The ultimate goal of economic sanctions is to push a state to respect the rules of international law.”

States often resort to economic sanctions because of their low cost compared to the use of military force. However, the controversy over their effectiveness in pushing for democratization and respect for human rights remains on the table. In reality, the vast majority of economic sanctions have failed to achieve their objectives, except in limited cases.

Originally, the task of imposing economic sanctions fell within the purview of the UN Security Council. However, states and organizations have the right to impose them if the United Nations fails to perform its function. This has occurred in the case of the Syrian crisis, where the United Nations was unable to impose any punitive action against the Syrian regime, because of the abuse of the veto power by Russia and China, which led to the failure of all draft resolutions submitted to the international body.

Economic sanctions vary, from economic boycott, embargo, to blacklisting and naval blockades. In the Syrian case, the sanctions against Syria combine the first three forms, but have not included a naval blockade.

Banning arms exports to Syria, freezing its financial assets, blocking their exports, suspending aid, loans and credit and

preventing regime officials from entering EU territory, is a combination of embargoes and boycotts, as well as subjecting individuals and entities to sanctions.

Although the sanctions imposed on Syria are meant to carefully considered and not designed to affect the lives of the civilian population, their synchronization with the state of war in the country has rendered them in this way and their economic effects have been integrated into the effects of the crisis in general.

It is therefore extremely difficult to differentiate the economic effects of sanctions imposed on the regime from those resulting from the state of war and destruction in the country in general, which exceeded anyone's worst nightmares.

The sanctions have also failed to be smart and selective as they were required, as they failed to influence the Assad regime and its officials and were unable to force it to change its behavior, despite the regime's overstatement of the effects of sanctions and its attempt to blame them for all the destruction in Syria.

In the meantime, the regime has managed to circumvent sanctions through its Russian and Iranian allies, who continue to support it with weapons, ammunition and fuel to operate its military machine, just as is the case with other authoritarian regimes that international sanctions have failed to deter.

We can easily see the inability of countries that have imposed sanctions on the regime to develop a proactive plan to prevent it from evading them through a circle of businesspersons associated with it. In one way or another, those businesspersons have been able to move their money and assets, via the establishment of fake and cross-border companies that have sidestepped international sanctions. They ensure the influx of

oil and weapons to the regime and facilitate the movement of its businesspersons from one country to another, away from the countries that banned their entry, and the empowerment of marginal figures to accomplish their work and the establishment of companies with other names.

Although arms control is designed to deny outlawed regimes and groups from accessing weapons, this goal remains elusive in Syria.

If we examine the five factors of the failure of the arms embargo identified by Lopez and Cortright[1], we find that at least three of them are available in the Syrian case. The sanctions imposed on Syria have not been issued by the Security Council; therefore have not been imposed with sufficient force; and they are not binding but for the countries which issued them, which has made it easier for the regime to circumvent them.

The most important sanctions imposed on Syria by Arab, European, American, and other international countries since 2011 can be detailed as follows:

I. International sanctions imposed on the regime since 2011

1. The sanctions of the European Union

In April 2011, the European Union expressed deep concern about the situation in Syria and the regime's deployment of military and security forces in a number of cities. It condemned the violent repression of peaceful protests and arbitrary arrests, and the use of live ammunition.

(1) David Cortright and George A. Lopez. Towards Smart Sanctions: Targeting Economic Statecraft. Rowman & Littlefield, 2002

Given the gravity of the situation, the EU called for restrictive measures against the regime and the people responsible for the repression of civilians.

On May 9, 2011, the EU adopted a series of restrictive measures, including a ban on the sale of arms and equipment used for internal repression, restrictions on the entry of regime figures into EU countries, as well as the freezing of funds and economic resources of some individuals and entities responsible for suppressing protests.

The EU kept the door open to the possibility of revising the list in view of the dangerous political situation in Syria.

Thirteen officials, including Maher al-Assad and Ali Mamlouk, were among those who were sanctioned.

In view of the continued repression of civilians, the European Union issued a new broader resolution in early December 2011, which included, in addition to the above, sanctioning additional sectors, including oil, gas, and petroleum products, the Syrian Central Bank, the banking sector and the electricity sector.

The EU Council also amended the list of individuals and entities included on the sanctions list, designating 86 military and security figures headed by Bashar al-Assad and his brother Maher and heads of the security services, in addition to a group of businesspersons affiliated with the regime, most prominent among whom is Makhlouf, the cousin of the Syrian President. Thirty entities were also included, on top of the security departments of the regime and a group of economic and financial entities affiliated with it. Some of these entities were owned by the state such as the commercial wing and the Real Estate Bank and the Commercial Bank; others included in the sanctions were owned by those close to the regime such

as «Sham Holding» and Syriatel, a telecom company, both of which are controlled by Rami Makhlouf.

On Jan. 23, 2012, EU foreign ministers tightened sanctions on Syria, adding 22 individuals and eight institutions to the blacklist.

On Feb. 27, 2012, the EU made a decision to ban the trade of gold and other precious metals with state institutions, and banned air cargo flights from Syria. Moreover, the Central Bank of Syria was added to its blacklists.

On March 4, 2012, the EU added a further seven ministers, bringing the total number of blacklisted Syrian regime officials to 277 and the total number of entities to 72. This meant a ban on their entry into EU territory and a freeze on their assets in European banks because of their responsibility for the repression of civilians in Syria.

2. US sanctions

US sanctions on the Syrian regime are not new. Some of them date back to the 1980s. Although Syrians remember the US economic blockade of Syria during that period, only few of them realize that these sanctions are still in force today. These few may be limited to the stakeholders and researchers in economics or international law.

The Syrian people did not show interest in these sanctions because of their limited impact, compared to the huge amount of corruption, bribery, and theft of public money that overwhelmed the country when Hafez al-Assad tightened his security grip on the country following the events of the 1980s, which he used as a pretext to suppress free speech. Those sanctions plainly failed to change the regime's behavior.

In 2004, the US sanctions program against Syria was refurbished due to the continued presence of the Syrian army in Lebanon, and the consequent murder of former Prime Minister Rafik al-Hariri, in addition to the regime's role in supporting terrorism in Iraq.

Still, the US sanctions expanded significantly in 2011, in response to the regime's violence and human rights violations following the outbreak of the Syrian revolution. The United States has placed sanctions on a number of companies, which prohibited Americans from dealing with them, and froze the assets of a larger number of Syrian officials and prevented them from traveling to the United States.

On Apr. 29, 2011, US President Barack Obama issued Executive Order 13572, which blocked property of Maher al-Assad, Ali Mamluk, and Atef Najib, the former head of the Syrian Political Security Directorate for Daraa Province, in response to, "the Government of Syria's human rights abuses, including those related to the repression of the people of Syria, manifested most recently by the use of violence and torture against, and arbitrary arrests and detentions of, peaceful protestors by police, security forces, and other entities that have engaged in human rights abuses".

The sanctions list also included officials from the General Intelligence Department and the al-Quds Forces from the Iranian Revolutionary Guard. The US Treasury was tasked with designating any person or entity it deems involved, in consultation with the State Department. Sanctions included the prohibition of any financial or credit assistance or technology support to the regime.

On May 18, 2011, Washington added Bashar al-Assad, his deputy Farouk al-Shara, the then Prime Minister, Minister of Interior, and Minister of Defense, in addition to the Director of Military Intelligence and the head of the Political Security Division to the sanctions list.

On Aug. 10, 2011, the Treasury expanded sanctions against the Assad government, adding the state-owned Commercial Bank of Syria and its Syrian-Lebanese Commercial Bank in Beirut to a blacklist of companies whose assets were frozen. The US Treasury also designated Syriatel, a mobile phone company owned by Rami Makhluf.

On Aug. 17, 2011, of the same year, the United States imposed new sanctions, including freezing all assets of the regime in the United States or under the jurisdiction of the United States, preventing Americans from making new investments or services in Syria. It banned the import of Syrian oil products and added other companies to the list including the Syrian Oil Marketing Company, Sytrol, and the Syrian Petroleum Company.

Inearly December 2011, the USTreasury designated Mohammed Makhlouf, the uncle of President Assad, and General Aous Aslan, in addition to the Military Housing Corporation, as a Syrian government-controlled company that funds the regime, and the Real Estate Bank that runs government borrowings. In February 2012, it closed its embassy in Damascus.

In November 2018, the US Treasury Department's Office of Foreign Assets Control (OFAC) imposed sanctions on Russian and Iranian public and private entities for their involvement in buying Iranian oil on behalf of the Syrian regime, amounting to hundreds of millions of dollars in oil for the Hezbollah, Hamas, and the Quds Force.

On Mar. 25 2018, the US Treasury issued an advisory to alert persons involved in petroleum shipments for the Government of Syria, that these shipments create significant sanctions risk for entities and individuals in the shipping industry, including shipping companies, vessel owners, managers, operators, insurers, and financial institutions. Countries such as Iran and Russia have been involved in providing the Government of Syria with petroleum. This came as the US renewed it commitment to isolate the Syrian regime and its supporters from the global financial and trading systems, for violations against the Syrian people, regardless of the nationality of the perpetrators.

This advisory contains an annex providing a non-exhaustive list of vessels that have delivered petroleum to Syria, engaged in Ship-to-Ship (STS) transfers of petroleum destined for Syria, or have exported Syrian petroleum since 2016. Some of these shipments and transfers have involved Iranian-origin oil.

The United States has threatened to severely target anyone providing support to the regime, by facilitating exports to or imports from the Syrian government, including government-owned entities, unless such exports or imports are exempt or authorized.

The report also pointed to the practice of people in the petroleum shipping industry continuing to deploy deceptive practices by obfuscating the destination and recipient of oil shipments in the Mediterranean Sea ultimately destined for Syria.

The report included examples of documentation that typically accompanies a shipping transaction. Shipping companies have been known to falsify vessel and cargo documents to obscure

the destination of petroleum shipments. Shipping companies must have complete and accurate shipping documentation is critical to ensuring all parties to a transaction understand the parties, goods, and vessels involved in a given shipment. Other documents included: bills of lading, certificates of origin, invoices, packing lists, proof of insurance, and lists of last ports of call.

3. Other international sanctions

On Nov. 27, 2011, the Arab League adopted sanctions against the Syria regime, which included banning the travel of Syrian dignitaries and officials to Arab countries. The sanctions also included freezing their assets and the assets of the Syrian government, halting dealings with the Syrian Commercial Bank and the Central Bank, and halting trade exchanges with the Syrian government except those that affect the people, and freezing Arab investments in Syria.

On Nov. 30, 2011, Turkey announced a series of sanctions against the Syrian regime, including the suspension of the work of the Strategic Cooperation Council with Syria. Turkey also imposed a travel ban on Syrian officials and businesspersons close to the regime and froze their assets, and ended the sale and supply of weapons and military equipment of all types to the Syrian army. Syrian airplanes and vessels were prevented from using Turkish airspace and territorial waters. In addition, Turkey stopped all forms of cooperation with the Central and Commercial Bank of Syria, froze the assets of the Syrian government in Turkey, froze credit relations with the Syrian government and Turkish investments in Syria.

Switzerland announced similar measures against Syrian individuals and entities, including freezing funds, banning

financial transactions, preventing those covered by sanctions from entering the country, banning the construction of power plants, supplying telecommunications and Internet equipment, exporting precious metals and jewelry, as well as banning airline planes taking-off or landing at Swiss airports.

So did Canada, which suspended all bilateral cooperation agreements between the two countries.

Japan announced the freezing of financial assets of the Syrian government and prevented flights between the two countries, and stopped granting visas to those involved in the repression of the Syrian people.

Finally, in 2012, Australia adopted sanctions against the Syrian regime, banning the trade of oil, financial services, communications, and minerals sectors, as well as arms imports, as well as the travel of Syrian officials.

II. The impact of international sanctions on the Syrian economy

The United Nations Office for the Coordination of Humanitarian Affairs (OCHA) released its annual report on humanitarian needs in Syria in early March 2019, confirming that there are about 11.7 million people in Syria in need of various forms of humanitarian assistance, including 6.2 million internally displaced persons (IDPs), and 1.6 million displaced persons who are constantly on the move.

Half of this estimated figure, according to the report, are women; 0.5 million of them are children under the age of four; 25 percent of the internally displaced are women of childbearing

age, and 4 percent of them are pregnant. The report stated that there are 1.3 million disabled and half a million elderly.

One third of Syria's population is suffering from food insecurity, with chronic malnutrition in some areas, as well as outbreaks of acute measles, diarrhea, typhoid and leishmaniosis. At least one in three schools are damaged or destroyed.

The report pointed out that poverty has become worse than it was in 2015, when about 83 percent of Syrians lived below the poverty line. The monthly food ration consumes 50-80 percent of the monthly income, which indicates an increase in the number of "poor workers" in Syria.

The report noted that the population has adopted low coping strategies due to the lack of sustainable livelihoods, coupled with prolonged displacement, drought, and a depletion of savings, which led to chronic levels of deprivation and contributed to the adoption of harmful coping strategies by citizens, such as reducing food consumption or postponing urgent healthcare needs and skimping on hygiene supplies.

This deterioration coincided with a persistence of harmful practices such as child labor, recruitment of combatants, early marriage and others. This deterioration coincided with a persistence of harmful practices such as child labor, the recruitment of child soldiers, child marriage and others.

The report also cited specific ratios of the acute food need, which indicate the percentage of food insecurity in different Syrian governorates, as follows:

- Aleppo, home to 2.54 million people, with about 1.1 million people in dire need of food, an average of 40 percent.

- Damascus Countryside, there are about 0.98 million people in dire need of food out of 2.05 million people, or 48 percent.
- Idleb, where there are about 0.91 million people in severe need out of 1.63 million people, or 56 percent.
- Daraa, 0.68 million, of which 0.43 million are in dire need, or 63 percent.
- Homs, 0.67 million, of which 0.20 million are in urgent need, or 29 percent.
- Hassakeh, 0.64 million, of which 0.13 million are in dire need, or 19 percent.
- Hama, 0.58 million, of which 0.04 million are in dire need, or 7 percent.
- Deir ez-Zor, 0.54 million, of which 0.51 million are in dire need, or 96 percent.
- Suweida, with 0.21 million, of which 0.07 million are in severe need, or 34 percent, and
- Quneitra, with 0.07 million, of which 0.03 million are in dire need, or 45 percent.

In early April 2019, the Food and Agriculture Organization of the United Nations (FAO) released its Global Food Crisis Report,[1] which ranked Syria among the humanitarian emergencies on the same level as Yemen, Afghanistan, Ethiopia, and the Democratic Republic of Congo, which all suffers from high levels of acute and chronic malnutrition, threatening the health of young children and women in particular.

The report expected Syria in 2019 to remain among the most severe food crises in the world, with large segments of the population close to falling into an emergency level of acute food insecurity. It expected that the number of displaced people,

(1) See the report on this link, page 2 and 136 and after: http://www.fsinplatform.org/sites/default/files/resources/files/GRFC_2019-Full_Report.pdf

refugees and migrants will increase, due conflict/insecurity, climate shocks, and economic shocks.

FAO estimated that 6.5 million Syrians are food insecure and in need of urgent action, in addition to 2.5 million threatened by food insecurity. Food prices are now seven times higher than the average of five years before the crisis, and unemployment has risen to 55 percent.

In 2018, the number of IDPs was estimated at 6.2 million, including 1.3 million displaced between December 2018 and June 2019,(1) while the number of registered refugees in neighboring countries and Egypt was estimated at more than 5.6 million, excluding unregistered refugees and those who fled to Europe. The number of Syrians living below the poverty line was estimated at 83 percent compared to 28 percent in 2010.

The poverty rate among Syrian refugees in neighboring countries has exceeded 60 percent, while one million children were born during the crisis.

In regards to the regime losses, the tourism sector has witnessed a significant decline. In 2010, some 7.5 million tourists visited Syria in 2010, spending about 7 billion US dollars, but the industry has been completely paralyzed since the beginning of the crisis, which has cost Syria about 50 billion dollars since 2011. In addition, many tourist facilities were destroyed by barbaric shelling that targeted the health, service, tourism and economic sectors without discrimination.(2)

(1) See FAO/WFP Crop and Food Security Assessment Mission to the Syrian Arab Republic, 9 October 2018, http://www.fao.org/resilience/resources/resources-detail/en/c/1157035/

(2) Statements made by Syria's minister of tourism, available in Arabic at https://bit.ly/2r0rTPZ

The losses of the industrial sector in Syria in 2014 amounted to about 200 billion Syrian pounds (1 dollar = more than 500 SP) from direct and indirect damages.

In 2016, the Syrian Minister of Industry (SMI) estimated the losses to be 1 trillion Syrian pounds equally in both the public and private sectors.

In 2017, Industry Minister Ahmad al-Hamo revealed that the Syrian industrial sector had lost 4.5 billion dollars since the crisis began.

In 2018, the SMI confirmed that the losses of the industrial sector in Syria exceeded 2 billion US dollars(1).

The oil sector is one of the sectors most affected by the sanctions imposed on the regime, and with the Democratic Union Party (PYD) taking control of the Rumilan oil fields in 2013. Until 2011, the Rumilan oil field produced about 100,000 barrels per day, but the level of production fell to 24,000 barrels per day in 2016.(2) The number of employees declined from 5,700 in 2011 to only 3,400 employees who receive their salaries from the Syrian Ministry of Petroleum & Mineral Resources(3).

This decline is attributed to the inability to develop fields after the departure of foreign companies operating, and the prohibition of the sale, supply and transfer of key equipment and technology used in the oil industry, due to economic sanctions that hamper investing in fields that were retaken from the Islamic State (ISIS) in 2019. Hence, although the

(1) Statements made by Syria's minister of industry, available in Arabic at https://arabic.sputnik-knews.com/arab_world/201809271035618551-وزير-سوري-دمشق-القطاع-الصناع/

(2) See Rumailan oil production decline in Kurdistan Syria, available in in Arabic at http://www.rudaw.net/arabic/kurdistan/070520169

(3) Ibid.

regime controls some of the oil fields in Raqqa and Deir ez-Zor, its oil production is still minimal.

It is evident that the impact of international sanctions on the oil and gas sector outweighed the impact of all other sanctions in the crisis. The regime was unable to export shipments of oil and gas extracted from the fields that remained under its control, nor of those under the control of the PYD militia, nor from those that came to the regime through its brokers in ISIS-controlled fields. In fact, the regime limited the Syrian consumption to what its exhausted refineries in Homs and Banias could produce, leaving the rest to be liquidated by crude refineries in al-Hassakeh and Deir ez-Zor, or sold illegally.

The revenues of crude oil exports were an important source of financing imports of public and private sectors and help ensure the stability of the exchange rate of the Syrian pound. In fact, the export of oil and its derivatives accounted for 35 percent of foreign exchange revenues and financed 30 percent of the state budget. The exchange rate of the Syrian pound increased by half in 2012, and this reinforced the orientation of Syrians, especially traders, to convert their money into foreign currencies, especially the US dollar.

In April 2019, the United States announced that it would not renew exemptions granted last year to buyers of Iranian oil, which had a visible effect on the Syrian street, seen in the queues of cars at petrol stations, and was already strained following the vote by the US House of Representatives to activate the Caesar Civilian Protection Act, which led to high prices, especially fuel prices, and made the acquisition of a gas cylinder an impressive achievement.

Before these two things, economic sanctions did not have a distinct effect from the other general effects of the crisis that have plagued the country for eight years, as it was difficult to isolate the magnitude of the impact of international sanctions alone, because of the overlap of some aspects.

In 2017, the Syrian Ministry of Oil had predicted that production will reach 221,000 barrels per day in 2019, and gas production will reach 16.6 million cubic meters[1], but these estimates went unheeded. In fact, 2019 was the most difficult time to secure fuel since the beginning of the revolution. Both the length of crisis and the economic sanctions were behind the decline of the oil production.

Although the crisis has entered its ninth year in a row, and distressed all Syrian national sectors, the military machine of the Assad regime was not affected equally, as the necessary supplies of weapons, ammunition and spare parts continued to flow, enabling the regime forces to target hundreds of villages, towns and cities and spread destruction and terror across the country.

The regime's factories continued to produce the necessary killing tools, such as the indiscriminate barrel bombs, missiles, cluster munitions and internationally prohibited chemical weapons. Russia and Iran also contributed to Assad's slaughter by providing him with fuel to operate his military machine, including planes, vehicles and artillery. They provided these tools either directly via sea and air shipments or through its network of Syrian and foreign businesspersons who exploited this trade to enrich themselves at the expense of the blood of Syrians.

(1) A report on Iranian al-Alam TV channel, available in Arabic at https://www.alalamtv.net/news/1968248/تقارير-صادمة-هذا-ما-تنتجه-سوريا-اليوم-من-الغاز-والنفط

III. Mechanisms used by the regime to circumvent international sanctions

Oil is a strategic sector in Syria. For over two decades it constituted a fifth of GDP directly(1), as well as an indirect contribution in other economic sectors.

Syria's oil production reached about 386,000 barrels per day (bpd) in 2010, of which 52 percent was produced by national companies, more than half of which was delivered to the Homs and Banias refineries. The rest was exported, while gas production reached 27 million cubic meters per day, all of which was delivered to gas plants, according to data from the Syrian Ministry of Oil and Mineral Resources.(2)

Following the outbreak of popular protests in Syria in 2011, oil production began to decline until it reached less than 20,000 bpd in 2015, with losses estimated at about 27 billion dollars in the same year.

The oil sector was one of the first to be adversely affected by the start of the Syrian revolution. Moving tanks to suppress rebellious cities prompted rebels to make limited attempts to sabotage oil supply lines heading to refineries, in a move to force the regime to halt its incursion into cities with military vehicles.

As protests spread in proportion to the increasing repression and incursions into cities, the regime shifted most of its oil production to operate its military machine and reduced the

(1) Effects of Economic Sanctions in Syria Petroleum Sector: Service Contract Companies as Case Studies, A Masters thesis, Damascus University Publications, 2015 (in Arabic).

(2) See Arabian Business Website: https://arabic.arabianbusiness.com/business/energy/2011/jan/25/49837

share allocated for local consumption by citizens. Lines of cars and citizens began to appear at gas stations.

When the city of Aleppo and its province fell out of the regime's control in mid-2012, the regime suffered a severe blow due to the halt in production of many oil wells in Deir ez-Zor, prompting the regime to hand over the protection and guarding of its oil facilities in Rumilan to the Democratic Union Party (PYD), in return for 40 percent of the oil for the PYD. Later, the regime abandoned the Rumilan oil administration and production to the PYD.

Opposition factions and the Free Syrian Army (FSA) briefly controlled the oil fields in Deir ez-Zor and Shaddadi, before the Islamic State (ISIS) raided them in mid-2014 and took control. Thus, the vast majority of the oil and gas fields came under the control of ISIS or under the protection of Kurdish units.

Although the oil and gas sources and their facilities were out of control of the regime, its energy resources remained sufficient to supply its military machine and vital facilities, because the Rumilan oil field employees continued their work and received their salaries from the regime government, despite their affiliation to the PYD. The gas cylinders from the Sweidiyah factory in the province of Hassakeh kept supplying the needs of the entire province.

Similarly, the workers at the wells controlled by ISIS continued to receive their salaries from the regime government through remittance offices, which guaranteed the gas flow to regime stations, and tanker convoys continuing to transport oil from its source to refineries in the regime-controlled areas through intermediaries took over the task of transporting oil supplies.

In addition, the regime had a few deals with Jabhat al-Nusra in Deir ez-Zor "to allow the transfer of crude across the front lines to the Mediterranean coast," according to The Guardian. The paper stressed that the, "Syrian regime is paying more than 150 million Syrian pounds monthly to Jabhat al-Nusra to guarantee oil is kept pumping through two major oil pipelines in Banias and Lattakia. Middlemen trusted by both sides are to facilitate the deal and transfer money" to the organization.(1)

In mid-2014, leaked reports talked about a deal between ISIS in Raqqa and the Syrian regime. According to the deal, ISIS took the task of protecting the Twenan field near Tabaqa and securing the access of crude oil to the regime's refineries. In return, the regime would provide maintenance and engineers to manage them, and it was agreed that the profits would be shared, with 60 percent going to the regime and 40 percent going to ISIS. ISIS also agreed to continue supplying gas to the regime's power plants.

On Dec. 1, 2015, German Deputy Foreign Ministry spokesperson Sawsan Shabli said that her country had documents proving the Syrian regime's purchase of the bulk of ISIS oil.(2) Documents revealed by US forces in 2016 showed that ISIS was making 40 million dollars a month in sales. The Wall Street Journal published a memo (Memo No. 156 dated Feb. 11, 2015,) from the Islamic State's treasury to Abou Sayyaf's boss, in which ISIS, «requested guidance on establishing investment relationships with businessmen linked to the regime of Syrian President Bashar al-Assad. The document said the terror group already had agreements allowing trucks and pipeline transit

(1) EU decision to lift Syrian oil sanctions boosts jihadist groups, The Guardian, May 19, 2019, available at https://www.theguardian.com/world/2013/may/19/eu-syria-oil-jihadist-al-qaida

(2) See source in Arabic: https://bit.ly/2ZdzK7Z

from regime-controlled fields through Islamic State-controlled territory.[1]»

In July 2017, a Syrian economist close to the regime revealed to the Italian news agency AKI, that the refineries are filtering oil received through intermediaries from both ISIS and the Kurds. According to the expert, whom the news agency did not name, the regime would keep a portion of the refined oil and give back the other portions to ISIS and the Kurds. The source added that the Kurds sold their share to Iran and Russia through Russian mediators.[2]

The expert revealed that the Syrian regime was still responsible for the maintenance and supply of production wells with engineers, equipment and spare parts in areas controlled by both the Kurds and ISIS, while the Kurds and ISIS bear the costs oftransport.[3]

The Financial Times (August 2017) estimated ISIS's daily profits of 1 million dollars from the oil trade, despite the loss of much of the territory that was under its control at the time. The regime's main broker at the time, according to the Financial Times' story, opened an office in the very areas that were under ISIS control, where lines of young men lined up daily for the coveted opportunity to drive the tankers, for 130 dollars per trip.[4] The broker whom the paper would not name is Mohammed Qaterji.

In addition to the above-mentioned amounts of oil, the regime's allies, led by Iran, spared no effort in supplying the regime with

(1) The Rise and Deadly Fall of Islamic State's Oil Tycoon, WSJ, available at https://www.wsj.com/articles/the-rise-and-deadly-fall-of-islamic-states-oil-tycoon-1461522313
(2) See https://bit.ly/2Z3igzW
(3) Ibid
(4) See Isis finds escape route for the profits of war, available at https://www.ft.com/content/b2f616d4-8656-11e7-8bb1-5ba57d47eff7

the oil derivatives it needed. Between February and October 2013, Syria imported, according to Reuters, up to 17 million barrels of crude oil, "of which roughly half came directly from Iran and half from Egypt's Sidi Kerir port, according a Middle Eastern shipping source. The cache of documents reveals that at least half of the oil from Egypt's port was Iraqi crude."(1)

As well as the regime obtaining quantities of oil from Iraq, they also secured oil from Russia and even from Venezuela despite the vast distances between the two countries(2). The Syrian Ministry of Oil's website published news (Feb. 14, 2017) of the arrival of an oil tanker to Syrian ports loaded with about 136,000 tons of oil, the equivalent of one million barrels according to theministry'swebsite.(3)

The liberation of Deir ez-Zor from ISIS in 2019 was not in the interest of the regime, as it led to the suspension of oil resources obtained by the regime through its proxy businessmen.

The Syrian Democratic Forces (SDF) attempted to quickly resume oil shipments to regime-held areas via tankers, and extended a pipeline from Sabha village to the other side of the river, but the International Coalition aircrafts bombed of the convoy of tankers, halting the transfer.

On the financial front, the regime implicated the Syria Islamic Bank in its financial dealings, prompting the United States to accuse the bank of acting as an agent of the Syrian government

(1) See Reuters, Exclusive: Assad's secret oil lifeline: Iraqi crude from Egypt, available at https://www.reuters.com/article/us-syria-oil/exclusive-assads-secret-oil-lifeline-iraqi-crude-from-egypt-idUSBRE9BM0RI20131223

(2) See Venezuela sends oil to Syria despite sanctions, Al-Arab newspaper, available in Arabic at https://www.alarab.qa/story/175933/ف نزويال-ترسل-نفطا-إلى-سوريا-رغم-العقوبات-الغربية

(3) See source in Arabic at http://www.mopmr.gov.sy/index.php/ar/news-ar/47-oiltanker14-2-2017

in circumventing sanctions, leading the US Treasury to impose sanctions.(1)

Iran also opened up financial support and credit lines to the regime, which during the years of the Syrian war amounted to approximately 7 billion dollars, in addition to secret loans that financed the regime with weapons, ammunition, and oil derivatives.

In addition, the regime managed to obtain secret loans from Russia. The high volume of internal and external debt of the Syrian government confirms that the regime obtained loans from Russia or other countries that it did not publicly announce.

In August 2013, Syrian institutions announced a series of tenders for the purchase of wheat, sugar and rice in quantities totalling more than 500,000 tons, with repayments made from frozen accounts through waivers from countries that imposed financial sanctions.

In a blow to the regime's funding network abroad, which assist it to circumvent the sanctions, the United States imposed sanctions (September 2018) on entities in Syria, Lebanon, and the United Arab Emirates that were providing oil and gas shipments to the Syrian regime, including:

- Abar Petroleum, a Lebanon-based company, and its adviser Adnan al-Ali, for working with the Government of Syria to evade sanctions and import crude oil and petroleum products to Syrian ports;

- Sonex Investments, based in the United Arab Emirates;

(1) See "TREASURY SANCTIONS SYRIA INTERNATIONAL ISLAMIC BANK", available at https://www.treasury.gov/press-center/press-releases/Pages/tg1596.aspx

- Nasco Polymers, a Lebanon-based company, and its chairman, Fadi Nasser, who, «arranged for the delivery of thousands of tons of fuel to Syrian ports in return for millions of dollars.»

- Yasser Abbas, a middleman based in Syria, for providing financial, material and technological support to the Syrian government.

- International Pipeline Construction (IPC), a UAE based company controlled by HESCO Engineering, which facilitates payments originating in Syria. HESCO Engineering is owned by George Haswani, one of the Syrian regime's middlemen for dealings between the Government of Syria and ISIS for facilitating payments from Syria.(1) The US Treasury indicated that the reason for the imposition of sanctions was for facilitating petroleum shipments and financing to the Syrian Regime.

In 2016, the leaked «Panama Papers» on tax havens, revealed the involvement of the regime in the establishment of three fake companies to circumvent international sanctions, according to the French newspaper Le Monde.(2)

According to an investigation conducted by Le Monde along with the International Federation of Investigative Journalists (IFJ), the policy of registering companies in tax havens is not new to the Syrian regime.

In 2002, Rami Makhlouf founded Syriatel, a mobile phone company, with 10% in Syria and 63% registered to a fake company he set up in the British Virgin Islands under the name DREX TECHNOLOGIES.(3)

(1) U.S. Treasury Imposes Sanctions on Assad Regime's Key ISIS Intermediary and a Petroleum Procurement Network https://home.treasury.gov/news/press-releases/sm474

(2) The Syrian regime evaded international sanctions, Al-Jazeera, available in Arabic at https://binged.it/2ZnO5CL

(3) Al-Jisr TV Channel, Panama leaked documents shocks the world, in Arabic at https://bit.ly/2N-

According to Le Monde, the three companies, Pangates International, Maxima Middle Trading and Morgan Additives Manufacturing, have provided fuel for Syrian warplanes, which have killed tens of thousands of civilians since the start of the conflict in 2011.

Correspondence exchanged between Pangates and the Mossak Fonseca office in Panama shows that the relationship dates back to 1999, first recorded on the island of Niue, but the island stopped registering offshore companies in 2012, forcing the company to move to Samoa and then to the Seychelles.(1)

Pangats, a specialist in refined petroleum products, belongs to the Abdulkarim Group, a Damascus-based close affiliate of the Syrian regime.

The leaks also revealed that the office of Mossack Fonseca was running six subsidiaries of Rami Makhlouf in the British Virgin Islands.

According to the Financial Times, Makhlouf invested in the most profitable sectors of the economy, such as telecommunications, tourism, civil aviation, media, real estate, and monopolies in import and export, and banking services. In 2011, Makhlouf controlled as much as 60 percent of the Syrian economy.(2)

In 2008, the US Treasury Department accused Rami Makhlouf of manipulating the Syrian judicial system and using Syrian intelligence officials to intimidate his business rivals. The Office of Foreign Assets Control (OFAC) said that Makhlouf had benefited from and aided “the public corruption of Syrian

---

u0bE1

(1) Radio Monte Carlo Website, in Arabic, https://bit.ly/2KRwZFi

(2) Assad cousin accused of favouring family | Financial Times https://www.ft.com/content/e29a73f8-6b78-11e0-a53e-00144feab49a

regime officials."[1] A number of his companies were also sanctioned and banned from working in the United States.

ThePanama Documentsconfirmedthat MossackFonseca'soffice helped Rami Makhlouf maintain his 2010 Drex Technologies SA registration in the Virgin Islands, despite sanctions against him.[2]

Suleiman Marouf, a businessman with technology interests, also played a role in helping the regime circumvent the sanctions. The Guardian newspaper reported that Marouf helped Bashar al-Assad Bashar buy, "at least six luxury flats in London worth nearly 6 million pounds sterling through British Virgin Islands (BVI) companies." In addition, Marouf, "carried out shopping errands for the Syrian president's London-educated wife, Asma. In March 2012, the Guardian published a series of leaked emails in which Asma placed orders with Marouf for goods worth thousands of pounds from Armani and Harrods."[3]

In addition to Drex Technologies SA, owned by Rami Makhlouf, which owns 63 percent of Syriatel's shares indirectly, the Panama documents reveal the names of other companies owned by the Makhlouf family: Lorie Limited; Dorling International Limited; Ramak Ltd; Cara Corporation; Seadale International Corporation, which he shares with his brother Hafez Makhlouf; and Eagle Trading & Contracting Limited, co-owned by Hafez Makhlouf with Lane Management LLC.

The US Treasury Department revealed (July 2014) a network of Syrian companies, businessmen, ships and government institutions, which provided oil and technological support for

(1) See Rami Makhluf Designated for Benefiting from Syrian Corruption, available at https://www.treasury.gov/press-center/press-releases/Pages/hp834.aspx

(2) See Al-Khaleejonline, Assad used partners to purchase luxury apartments in London, available in Arabic at https://bit.ly/2NBU1lo

(3) See Assad's London fixer uses offshore firms to hold luxury London flats https://www.theguardian.com/news/2016/apr/05/panama-papers-assad-fixer-london-property

the military campaign led by the Syrian regime against the people, operating in: the United Arab Emirates, Switzerland, Turkey and the Netherlands. The Treasury indicated that the most prominent players of this network is a Syrian company called Abdulkarim Group, which falsified contracts and data for shipping, and changed the destinations of ships and made them disappear and then reappear on the radar, to evade sanctions imposed on Syrian institutions by the United States, Europe and Canada, with the aim of providing oil support and equipment to the Syrian regime and its military machine, including funding for the Syrian regime's aircraft and ships.

The Treasury has imposed sanctions on three companies from the network: Expert Partners; Megatrade; and Pangates International Corporation Ltd. The Treasury accused the first two of "acting for or on behalf of the US-sanctioned entity Scientific Studies and Research Center (SSRC), Syria's government agency responsible for developing and producing non-conventional weapons and ballistic missiles."(1)

The third company is based in the United Arab Emirates. Its owner Wael Abdulkarim, a 41-year-old Palestinian-Syrian, was identified in late 2014, and was added to the list of sanctions. The US Treasury also designated another company affiliated to Wael Abdulkarim, Maxima Middle East Trading Co.(2)

OFAC also identified the group shareholders and partners, including 31-year-old Ahmad Barqawi, a Palestinian-Syrian, who was general manager of Maxima Middle East Trading Co,

(1) See Treasury Sanctions Companies for Aiding the Syrian Regime https://www.treasury.gov/press-center/press-releases/Pages/jl2558.aspx

(2) See Will Fitzgibbon and Martha M. Hamilton, Parade of the Blacklisted Marches Through Firm's Client List — and Syria's Civil War, https://www.occrp.org/en/panamapapers/parade-of-the-blacklisted/

and other people involved in the case, from Switzerland and the Netherlands.

In March 2015, the US authorities revealed more people involved in this network: six companies, four Turkish businessmen, and about 10 ships registered in Panama and Sierra Leone, in addition to Syrian government institutions such as the oil company and the ports company.

With this discovery, the US authorities began to uncover offshore companies or safe havens operating within the Abdulkarim Group, companies whose names are hidden to evade responsibility.(1)

The term "offshore" refers to a company, corporation, LLC or similar class of entity formed in a foreign (safe haven) country to that of the principals of the organization or one that can only operate outside of its country of formation, as in the case of the Abdulkarim Group.

The US authorities were able to link the Abdulkarim Group to hidden companies, including:

- The Eagles LLC, based in Syria.

- Morgan Additives Manufacturing Co in the Jebel Ali Port Free Zone in the Emirate of Dubai and registered in the Seychelles.(2)

- Millennium Shipping, a shipping company operating in Turkey, butregisteredinPanama.(3)

- EBLA TRADE SEVICES S.A., which acted as a maritime intermediary for transporting cargo to the port of Banias

(1) See "Assad's men: secrets of the Syrian regime's breach of international sanctions, al-Arabi al-Jadeed April 5, 2016, available in Arabic at https://bit.ly/2Tn9LwT

(2) Ibid

(3) Ibid

in Syria. It is a Lebanese company established in 2013 and registered under the offshore system in Lebanon, where it was designated by the US Treasury in 2015.[1]

Al-Araby Al-Jadeed revealed in its report on the company's commercial register, which showed the names of thirteen Syrians and Lebanese shareholders and authorized signatories, led by two sons of Syrian businessman Mohamed Hamsho, who are under US and European sanctions, Mohammed Saber and Amr, as well as sons of a Lebanese businessman of Syrian origin Mohammed Hashem al-Sufi.[2]

Mohammed Hamsho belongs to the narrow economic circle around Bashar al-Assad, Rami Makhlouf's partner at Sham Holding, and founder and director of several companies operating in various business fields.[3]

According to the same report, the Abdulkarim Group is at the center of international networks responsible for providing energy products used by the Assad regime, but by no means is it the only component in the murky web of finance that continues to fuel the ongoing conflict in Syria, according to the OFAC. While the US Treasury has revealed many details about the shell and offshore companies that make up the networks in the past several years, it has missed several important facts. Thanks to the Panama leaks, however, we can learn more about how the Assad regime's shadow brokers work and who they are. For instance, US authorities could not discover the identities of the real owners of Ebla Trade Services S.A., a Lebanon-based offshore company designated in the sanctions

(1) https://www.treasury.gov/press-center/press-releases/Pages/jl0137.aspx
(2) Al-Araby al-Jadeed, Ibid.
(3) Ibid.

for its involvement in supplying gas to the Syrian regime's war effort.[1]

Another name in the company's files, a Syrian-Palestinian citizen named Nasim Barqawi, also disappears. The OFAC could not identify him, while it identified his brother Ahmad Barqawi. The OFAC also failed to identify Syrian businessman Abdullah Zaina, 51, despite being a shareholder and director of the company during the sanctions imposed against it by US authorities.

Apparently, the US sanctions did not include the entire Abdulkarim Group, as the Treasury investigations did not disclose JAKOC Petroleum Limited, established in 2011 in the Seychelles, owned by Jamal, Wael and Fadi Abdulkarim, nor did it disclose Vectra International Trading, which is jointly operated and managed by Adnan Abdelkarim and Ahmad Barqawi who was designated by the Treasury in 2014.[2]

The Abdulkarim Group has been hiding by concealing the names of its founders and its shareholders, so that if one is designated by the US, the work of the others is not affected, which is why Hamsho and Abdulkarim listed the entire family, including children, among the founders of these companies.

The records of Abdulkarim Group companies' show that they have been dealing with Syria International Islamic Bank, which has been under US sanctions since 2012. One of these bank co-owners is Iyhab Makhlouf, who has been designated since 2011.[3]

(1) Ibid.
(2) Ibid.
(3) Ibid.

It is safe to say that the sanctions did not perform the function that they were expected to perform, as the group continued to operate, and many of its members remained outside those sanctions although their partners have been designated.

The same situation occur with a network run by Mohammad Amer Shuwayki through his Russian-based company Global Vision Group. The US Department of the Treasury's Office of Foreign Assets Control (OFAC) sanctioned Shuwayki at the end of 2018, for delivering the oil from Iran to the Syrian regime, using a number of vessels, many of which have been insured by European companies. Since at least 2014, vessels carrying Iranian oil have switched off the onboard Automatic Identification System (AIS) before delivering oil to Syria, as a means of concealing the true destination and recipient of this Iranianoil.(1)

The Shweiki Group is transferring funds from Iran to Russia under the cover of humanitarian goods, as US Treasury Secretary Steven Mnuchin put it. "The Central Bank of Iran officials continue to exploit the international financial system, and in this case even used a company whose name suggests a trade in humanitarian goods as a tool to facilitate financial transfers supporting this oil scheme (…) to solidify Assad's authoritarian rule."(2)

At the local level, the regime has set up fake companies to import oil derivatives, ammunition and weapons through Syrian businessmen, most notably Rami Makhlouf. In 2011, Western media highlighted the role of the British company Gulfsands, for violating sanctions against the regime, in which the cousin of

(1) See the US Department of Treasury, RUSSIAN AND IRANIAN GOVERNMENTS FACILITATION OF OIL SHIPMENTS TO ASSAD, available at https://home.treasury.gov/news/press-releases/sm553
(2) Ibid.

Rami Makhlouf owns many shares, and although the company subsequently complied with European sanctions, it authorized the state-owned General Petroleum Corporation to continue production, confirming that the company's withdrawal from the Syrian oil sector was a formality.(1)

When the oil wells fell out of the regime's control, a new phenomenon surfaced – the oil mafias. A number of intermediaries were active under the cover of the regime, headed by: Iyhab Makhlouf, Ayman Jaber, Ammar al-Sharif, and Yasser Abbas, all of whom exported oil under the management of Russian traders, who took on the task of transporting oil to Europe through the government port of Banias.

To legalize these mafias, the regime issued Legislative Decree No. 55 of 2013, which allowed for the establishment of private security companies to escort convoys from ISIS-controlled oil sources and the Kurdish People Protection Units forces to regime-held areas.

In March 2015, the European Union imposed sanctions on George Hasswani, a Syrian businessman, for his work as an intermediary in oil contracts between the regime and ISIS(2). Hasswani was subjected to US sanctions in November 2015 on the same charges.(3) However, an EU court nullified sanctions, which forced the EU to delist Hasswani,(4) who remain though,

(1) On this see WST, Oil Explorer Presses On in Syria, https://www.wsj.com/articles/SB10001424053111904009304576532501110614950

(2) See Reuter, EU accuses Syrian man of buying IS oil for govt; he denies charge, available at https://www.reuters.com/article/us-syria-crisis-eu/eu-accuses-syrian-man-of-buying-is-oil-for-govt-he-denies-charge-idUSKBN0M40EQ20150308

(3) See the US Department of Treasury, Treasury Sanctions Networks Providing Support to the Government of Syria, Including For Facilitating Syrian Government Oil Purchases from ISIL, available at https://www.treasury.gov/press-center/press-releases/Pages/jl0287.aspx

(4) See FDD, EU Delists Syrian Tycoon, Highlighting Global Sanctions Pitfalls, available at https://www.fdd.org/analysis/201730/03//eu-delists-syrian-tycoon-highlighting-global-sanctions-pitfalls/

together with his company HESCO Engineering & Construction Company, on the US sanctions lists.

Hasswani's partner in the HESCO Engineering & Construction Company is Yousef Arbash, who was awarded the Order of St. Sergey Radonezhsky, by the Patriarch of Moscow, Patriarch Kirill, which is granted only to dignitaries of Russian society. Through that close relationship the Russian Stroytransgaz was able to operate in Syria, and continued its work via HESCO in areas under the control of ISIS(1).

When Haswani's cards were burned, the regime pushed a new businessman who was one of Rami Makhlouf's protégés, Mohamad Qatiji, who had not been known by his fellow Syrians before. His brother, Hussam, however, was elected as a Member of Parliament. Qatirji bought stocks of grain silos in Deir ez-Zor from ISIS and later managed to buy the crop from farmers through his affiliates. In 2016, he concluded a deal with the terrorist organization, which included the transfer of oil to regime areas, and the supply of some goods and food to the regime through the transportation arm of the Qatirji Company.(2)

In August 2018, the US Treasury imposed more sanctions against Mohamad Qatirji on charges of facilitating the oil trade between the regime and the Islamic State. The Qaterji Company, was also hit by sanctions for carrying out shipments overseen by the US designated Syrian General Intelligence Directorate. The Syria-based Qatirji Company is a trucking company that has also shipped weapons from Iraq to Syria. Additionally, in a 2016 trade deal between the Government of Syria and ISIS, the Qatirji Company was identified as the exclusive agent for

(1) See Al-Arabiya Website: https://bit.ly/2Uk3Y8q

(2) See Reuters, How a businessman struck a deal with Islamic State to help Assad feed Syrians, available at https://www.reuters.com/article/us-mideast-crisis-syria-wheat-islamic-st/how-a-businessman-struck-a-deal-with-islamic-state-to-help-assad-feed-syrians-idUSKBN1CG0EL

providing supplies to ISIS-controlled areas, including oil and othercommodities.[1]

The EU has also imposed sanctions on Hussam Qatirji, a member of the Syrian People's Assembly, Mohamad's brother and president of the Qatirji International Group.[2]

The Wall Street Journal revealed in February 2018 that the Syrian Democratic Forces (SDF) were suppling oil to the regime, raising questions about Washington's seriousness in putting economic pressure on the Damascus regime. The Wall Street Journal quoted a person familiar with US intelligence and a tanker-truck driver transporting the crude oil who said that the, "Kurdish-led Syrian Democratic Forces, or SDF, is delivering oil to the Qatirji Group, a Syrian broker targeted by US and European sanctions for supplying fuel to Assad's government."[3]

According to the paper, the oil comes from ,"desert territory in eastern Syria under the control of the SDF, a group of militias working with US troops still stationed in the country".[4]

This coincided with the publication of leaks (August 2018) on the regime sending a number of experts and maintenance workshops to the al-Kibbiyeh oil field , 60 kilometers southeast of Hassakeh, under the control of Kurdish forces, to rehabilitate the field. Washington had given tacit approval, prompting the Turkish Minister of Interior to openly accuse the United Statesof sharing oil revenues with Kurdish forces,[5] as informed

(1) See U.S. Treasury Imposes Sanctions on Assad Regime's Key ISIS Intermediary and a Petroleum Procurement Network, available at https://home.treasury.gov/news/press-releases/sm474

(2) See https://jamespetersnell.wordpress.com/2019/01/27/the-european-union-sanctions-syrians-linked-to-regime-reconstruction/

(3) Wall Street Journal, February 8, 2018, available at https://www.wsj.com/articles/u-s-s-syria-ally-supplies-oil-to-assads-brokers-11549645073

(4) Ibid.

(5) Iqtissad, available in Arabic at https://www.eqtsad.net/news/article/22616/

sources confirmed the participation of American and French engineers along with 100 regime employees in the repair and operation of the fields of al-Omar and al-Tanak in Deir ez-Zor in September2018.[1]

Violations by many Western companies in favor of the regime's allies are another source of help in circumventing international sanctions. In late April 2018, Danish media network DR reported that government sources suspected that the Danish company Dan-Bunkering played a key role in a case involving the " illegal supplies of at least 30,000 metrics tons of jet fuel for the civil war in Syria, the Danish Broadcasting Corporation (DR) reports based on US Court Records and confidential information possessed by Danish Authorities"[2] Dan-Bunkering is part of Bunker Holding A/S, which is the world's second-largest bunker company.

According to the information, Dan-Bunkering has supplied jet fuel for the Russian shipping company Sovfracht, which in turn has supplied Russian fighter planes in Syria; fighter planes that have carried out airstrikes in support of Syrian President Bashar al-Assad. The deliveries allegedly took place from January 2016 toMay2017.[3]

According to the same web site, "Dan-Bunkering played a part in at least six deliveries of jet fuel for use in Syria and that the company had been involved in jet fuel transactions amounting to more than 16 million dollars."[4]

(1) Iqtissad, available in Arabic at https://www.eqtsad.net/news/article/21672/

(2) DR, Exclusive: Danish bunker company involved in case of jet fuel for air strikes in Syria, available at https://bit.ly/2P8Dc2b

(3) Ibid

(4) Ibid.

On several occasions, a front company for Russian Sovfracht paid Dan-Bunkering for ship-to-ship transfers of jet fuel. The fuel was transferred from petroleum tankers to the Russian tankers Yaz and Mukhalatka, which subsequently sailed to the Assad-controlled Port Banias in Syria, according to descriptions in US court records. Ship location data collected by DR shows that the transshipments took place in the Mediterranean.[1]

The company defended itself by claiming that it did not deliver fuel to Syria, nor to a company listed on the EU sanctions list, ignoring that the fuel it shipped was used to fire shells and rockets that killed thousands of civilians and displaced millions of others, and burned large areas of Syrian cities cities and towns.

This incident confirms the efforts of some international companies to systematically circumvent the sanctions imposed on the regime for several years. It took months for investigations to uncover only one oil shipment of the many that reach Syrian ports, with there being no ability to prevent them or hold the perpetrators of these violations to account. Many of these violators are still not subject to legal accountability and their names are outside international regulations, despite the proven charges against them.

(1) Ibid.

Chapter 2:

Assad's network of businessman



Rami Makhlouf

Place of Birth:
Jableh – Latakia 10/07/1969

Maternal cousin of Bashar al-Assad, Operates several businesses in many fields such as media, banking, insurance companies, hotels, factories, real estates, travel and tourism sectors.

Rami Makhlouf is the main owner of Syriatel. Owns the largest stake in MTN the second biggest mobile phone company in Syria, Controls many free trade zones across all air and land borders. His "Al-Bustan" organization is accused of the violations that were committed by the Assad regime against the Syrian people.

Sanctions: His accounts and properties were frozen in Switwzerland by the Swiss authorities, his name was put in the sanctions black lists of the United States, Canada European Union and the United Kingdom.

Rami Mohamed Makhlouf was born on 10/7/1969 in the Bustan al-Basha area in the town of Jableh in Lattakia province. He is the oldest son of Mohamed Makhlouf, the brother of Anisa Makhlouf, who was the wife of Hafez al-Assad and Bashar al-Assad's mother.

Rami Makhlouf embarked on his path in corruption early, taking advantage of the commercial embargo on Syria in the 1980s to smuggle foodstuffs, electrical supplies, and industrial equipment from Lebanon and Turkey. In this, he relied on his father's prestige and influence, which allowed him to smuggle these goods without anyone troubling him.

At a later stage, Rami Makhlouf became a tobacco merchant, as his father was the director of the Tobacco Corporation, as well as the Syrian Real Estate Bank, from which he was able

to secure major loans on long-term payment plans and to withdraw money through fake loans to fake individuals or facilities which had asset blocks.

Soon, he had developed private networks to smuggle cigarettes, foodstuffs, electrical supplies and other items through al-Jdayda crossings. He took control of the duty free at the Damascus International Airport through an annual contract set at just one million lira during the era of former Prime Minister Mahmoud al-Zuabi. The duty free was a launchpad for smuggling into Syria, and eventually expanded to include land crossings, ports and airports. This pushed global firms to enter into commercial agreements with Rami Makhlouf and his brother Ehab, given that they controlled everything related to foreign markets and imports. The income from these markets was no less than 300 million dollars per year.

When Bashar al-Assad assumed power in the year 2000, Rami's influence expanded. He rejected the policy of economic opening and the pressure toward a social market economy system, which had allowed a little economic freedom in Syrian markets, and became the primary business agent for the Assad family. He became the biggest beneficiary of the new policy by entering into partnerships with enormous companies run by Syrian businessmen from commercial families.

At this time, Rami Makhlouf moved to Dubai to administer his business there. He also obtained licenses granted by Bashar al-Assad to just two mobile phone companies: Syriatel, owned by Rami, and Investcom[1], owned by Taha and Najib Mikati[2], in which Rami held a large portion of its shares. Its profits before 2011 were about 60 million dollars.

(1) Its name was changed multiple times until it became MTN

(2) The former prime minister of Lebanon

As Rami Makhlouf became the business agent for Bashar al-Assad, Mohamed Hamshou became the business agent for Maher al-Assad. Rami Makhlouf had major influence over the appointment of Adib Mayaleh as head of the Syrian Central Bank, which withdrew a large portion of foreign deposits of the Syrian state reserves in hard currency to inside the country, as well as selling dollars to the benefit of the trader Zuhair Sahloul—Rami Makhlouf's agent.

When two members of Syrian parliament, Riyad Saif and Mamoun al-Homsi, complained about corrupt practices at Syriatel, they were arrested, stripped of their parliamentary immunity, and then sent to the court on a number of charges, including sowing sectarian strife, and then were sentenced to seven years in prison.

Makhlouf also worked to launder millions of dollars for Uday and Qusay Saddam Hussein from 2000 to the American occupation of Iraq through his companies in Lebanon with the Mikati and Arslan families and through Rustum Ghazaleh, who enjoyed major influence in Lebanon.

In the automotive sector, Rami Makhlouf clashed with the German company Mercedes over its exclusive agency contract with its original agent, the Sanqar company. He put pressure on international agencies to prevent exclusive agent deals on the pretext of preventing monopolies. He also became an agent for BMW in Syria and got the Ministry of Defense to buy 27,000 cars and sell them to retired officers.

He has also entered into the real estate market through the Cham Holding company, as well as in cement manufacturing and tourism through the Al-Sharq Investment Fund, of which he owns 58 percent of the shares, as well as through the Corniche

Tourist Company. During this time, he bought two towers in Dubai near the Burj al-Arab hotel, registering one in the name of his wife and the other in the name of his children in anticipation of any developments that could affect him negatively. He invested with the Syrian businessman Mohamed Murtada al-Dandashi in the Emirati stock exchange, and entered with him into partnerships to buy land in Homs city.

His investments have extended into all other aspects of life in Syria. In media, he obtained the first license for a daily political newspaper Al-Watan, while he also established a number of regime websites. He has obtained a share of private banks, such as the International Islamic Bank of Syria, Byblos Bank, Baraka Bank, the International Bank of Qatar, and Al-Sham Bank, as well as the Bank of Jordan in Syria. He also has shares in insurance companies and in financial services. He established a cement factory at a value of 250 million dollars, and has obtained shares in several hotels. He obtained a license to develop the Lattakia corniche, in addition to owning Syriatel, and having a large share of the MTN company and the duty free areas at the Damascus International Airport and all border crossings.

Makhlouf also owns the Ramak Company which works in real estate and has many projects that were committed in fake bidding processes. He further owns the Cham Holding company in partnership with Imad Ghreiwati, which works in touristic investments. He has also established the Cham Wings Airline, and has worked to develop it in exchange for the gradual elimination of the General Organization of Syrian Aviation, which has come to own just one aircraft. He has pursued a similar style with all public state institutions that overlap with his commercial activities, undermining the activity of these institutions through orders directed to ministries or directors.

Rami's influence has also extended into "charitable" work, with his establishment of the Al-Bustan Association, whose activities since the start of the peaceful protests in March 2011 have turned toward supporting the regime's efforts to repress the people. Members of the group were supplied with money and weapons and helped the regime to circumvent the sanctions imposed on it through other partners and companies established in Dubai and Panama.

Through funding and supporting the gangs of the Al-Bustan Association, Rami Makhlouf is considered to be a primary partner in all the violations carried out by the regime, as well as being largely responsible for the collapse of the Syrian economy and handing it over to a limited number of his investor partners. He also had a major role in supporting the repression carried out by his brothers Ehab and Eyad Makhlouf as well as Brigadier General Hafez Makhlouf and his father Mohamed Makhlouf. Due to his role in supporting violations, Rami Makhlouf was included on the British(1), European(2), Canadian(3) and American(4) sanctions lists, while Switzerland has placed a block on all his assets and property on their territory.

(1) He ranked 196 in British sanctions
(2) He ranked 8 in European sanctions
(3) He ranked 12 in Canadian sanctions
(4) https://www.treasury.gov/resour



Iyhab Makhluf

Place of Birth:
Latakia 1973

.Maternal cousin of Bashar al-Assad, Rami Makhlouf's brother and his henchman, and togther with his brother Rami; is considered as one of the forefront economic entity of the regime in Syria.

Up to 200 currency exchange offices work for him in Damascus, owns and manages a number of investment companies of which the most famous are "Islamic Brokerage and Financial Services Company", "Peshawar Investment Company" and the "Ama-Noor" company in addition to many companies in the British "Virgin" Islands.

Involved in smuggling goods across borders between Syria and Lebanon. Provided logistic and financial support for the Syrian regime in committing crimes against the Syrian people.

Sanctions: Subject to US sanctions list.

Businessman Iyhab Muhammad Makhluf was born in 1973. He is the son of the corrupt Muhammad Makhluf, who is the brother of Anisah Makhluf, wife of Hafez al-Assad. Iyhab is the brother of the corrupt Rami Makhluf, the criminal Hafez Makhluf, and Iyad Makhluf. He is also the cousin of the killers Bashar and Maher al-Assad. This family sends its sons into the army or the economy. Iyhab chose the latter, and became one of the economic facades of the regime by investing the capital of the Syrian people, which had been looted by the Assad family, the Makhluf family, and others.

Iyhab Makhluf is a founder and owner of the following companies:

- Founder of the Islamic Company for Mediation and Financial Services.

- Founding partner in Peshawar for Investment (with a 99.8% stake).
- Founding partner in Bunyan al-Sham (with a 10% stake).
- Manager and founding partner in Ama-Nour (with a 50% stake).
- Founding partner in Suruh (with one share worth a 0.001% stake).
- Founding partner in the Private Syrian University for Sciences and Technology (with a 51% stake).
- Founding partner in Fajr Company (with a 40% stake). He also directs Hani Murtada University (named after the father of Mazen Murtada).
- Founding partner in Syriatel for Services and Investments (originally with a 2% stake, though it recently became clear that he holds a 14% stake), and Hadaeq for Investments (with a 14% stake).
- Founding partner in Hadaeq for Investments (with a 52% stake).
- Manager and owner of Al-Ghmar Company (with a 100% stake).

Iyhab Makhluf was also Vice CEO of Aqilah for Insurance, mentioned in the file of businessman Mazen Murtada.

Of course, all of the above are companies that belong to the Makhluf family, since Iyhab Makhluf is known to be the right hand man of Rami Makhluf. Iyhab[1] is a part of the financial empire, a portion of which was uncovered through Swiddleaks, which leaked documents pertaining to HSBC bank accounts in Switzerland. These documents revealed that the bank violated the ordinary client relationship with Rami Makhluf, managing certain funds on behalf of the Makhluf family despite the

(1) *Al-'Arabi al-Jadid*: https://goo.'gl/rNrFsA

sanctions imposed upon them. These files also exposed the dealings of Makhluf family proxies with an Israeli-Polish businessman, Fredy Zinger, who is resident in Israel, and his Israeli wife Luria Zinger. This arrangement was designed to manage the companies of the Makhluf family in European states, the United States, and other countries.(1)

At the same time, the Makhluf family – including Iyhab – owns certain companies in the British Virgin Islands managed by one Rosemary Flax.(2) The documents gathered by al-'Arabi al-Jadid reveal that Rosemary has been the faux manager of a number of companies since the imposition of sanctions on Rami in 2008 and the rest of the Makhluf siblings in 2011. These companies are Cara Corporation, Hoxim Lane Management Corp, Butler Investment Inc., Seadale International Corporation, and Luri Limited. Her name appeared within family trusts in these Swiss bank accounts. An author for al-'Arabi al-Jadid acquired original documents from the British Virgin Islands, in which these companies were listed as the property of the father, Muhammad Makhluf, his wife Ghada Mihna, and his sons: Rami, who presented himself in the bank's official register as a businessman and advisor to the Syrian Ministry of Industry; Hafez, who presented himself as a government employee while he worked as the head of a State Security branch of the Syrian secret police (Khatib branch), and then in the State Security administration; Iyad, who presented himself as a Captain in the Syrian Arab Army; and Iyhab, who is considered the right-hand man of Rami. Iyhab manages the Syrian Free Markets Company on behalf of Rami, who removed his name from the company due to the sanctions upon him.

(1) Ibid.

(2) Arab reporters for investigative journalism, "The Secret Empire of al-Assad's Maternal Family,"https://en.arij.net/report/the-secret-empire-of-al-assads-maternal-family

The Makhluf family, and behind them the Assad family, were not active in Syria alone. They also participated directly in smuggling between Lebanon and Syria. Iyhab Makhluf smuggles professionally and in person through official crossings between Syria and Lebanon, avoiding customs duties. We note here that an incident reported in the Lebanese al-Akhbar newspaper – which is loyal to the regime – proves this.(1)

Iyhab Makhluf has even benefitted from the rise in the value of the U.S. dollar relative to the Syrian pound in recent years. He has 200 currency exchange offices working for him in the city of Damascus,(2) whereas the Syrian people has paid the cost of this in blood.

Despite the European and U.S. sanctions(3) imposed on the Makhluf family – including Iyhab – and the Assad family, these two families continue to engage in crimes against the Syrian people. The Makhluf family manages capital pillaged from the Syrian people, while the Assad family kills the Syrian people using the army, which has been funded from Syrians' pockets since its establishment. Rami Makhluf's claim that Syria's security is Israel's security – meaning that it is in Israel's security interest for Assad to remain in place – constitutes the basis for the global deal to keep Assad in place.

(1) *Al-Akhbar*, https://al-akhbar.com/Syria/28135

(2) YouTube: Muhammad Fares Mansur – former media advisor in Makhluf's companies: https://www.youtube.com/watch?v=ZbV9ASa54r4

(3) U.S. sanctions on Iyhab, Rami, and others: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20170516.aspx

Nom de la personne	**ZINGER FREDY**		
Prénoms	FREDY		
Date de naissance	20/03/1954	**Sexe**	M
Lieu de naissance	POLAND	**Situat° Maritale**	
Profession			
		Nationalité	
Téléphones			
Personnel			
Portable			
Fax			
Professionnel			
Lien personne/profil client	BENEFICIAL OWNER		
Nom	MAKHLOUF EYAD		
Adresse	MR EYAD MOHAMAD MAKHLOUF C/O HSBC BANK MIDDLE EAST SIR V		
BUP	5090153194		
Code Client	5094037332		
Lien personne/profil client	BENEFICIAL OWNER		
Nom	MAKHLOUF HAFEZ		
Adresse	MR HAFEZ MOHAMAD MAKHLOUF MELKI BEZEM ST. FAROOQ BLD P.C		
BUP	5090153758		

Files leaked pertaining to the financial dealings of the Makhluf family published by al-'Arabi al-Jadeed.


The Directors:

Mr. Ehab Makhlouf
Mr. Mohamad Abbas
c/o HSBC Private Bank (Suisse) S.A.
Quai General Guisan, 2
CP 3580
1211 Geneva 3
Switzerland

Dear Sirs,

RE: BEADALE INTERNATIONAL CORPORATION

We hereby give you 90 days notice, pursuant to Section 83 (2) (a) of the BVI Business Companies Act, 2004, that it is our intention to resign as the Registered Agent for the above referenced Company.

We enclose a list of the directors and shareholders of the corporations licensed to provide the services of Registered Agent by the Office of the British Virgin

VIA MAIL

20th October, 2011

The Director:

Mr. Ehab Makhlouf
Qasim Street,
Malki-Damascus, Syria

Dear Mr. Makhlouf,

RE: HOXIM LANE MANAGEMENT CORP.

We hereby give you 90 days notice, pursuant to Section 83 (2) (a) of the BVI

21st September, 2011

The Director:

Mr. Rami Makhlouf
Malki Al-Bezem Street
Damascus
Syrian Arab
Republic

Dear Mr. Makhlouf,

RE: CARA CORPORATION



Khaldoun Makhluf

Occupation: Khaldoun is the son of Adnan Makhlouf the former commander of the Republican Guard in the Syrian army, and Rami Makhlouf's cousin.

Controls a large part of the tourism and hotel management sector in Syria. Held the position of trade director for Syrian Airlines, considered as one of the economic representatives of Rami Makhlouf.

Owns a number of investing and real estate companies, the most important of which is the Julia Dumna Group.

Engagements: Created and funded groups and gangs of mercenaries (Shabiha) in both Aleppo and Latakia, which carried out repression and violations against the Syrian people.

Sanctions: Not subject to any sanctions and continues to travel between Syria, United Arab Emirates, Russia and countries in the European Union.

Khaldoun Adnan Makhluf is the son of Major General 'Adnan Makhluf, former leader of the Syrian Arab Army's Republican Guard. He is also a relative of Bashar al-Asaad through his mother, Anissa Makhluf, and is the cousin of Rami Makhluf.

Khaldoun Makhluf controls a large portion of the tourism and hotel sector in Syria. He owns and runs a number of companies, and is a Founding Partner in others. He is the General Director and Founding Partner of the Julia Dumna Group, which owns a large number of agencies for international airline companies. He is the General Director and Founding Partner of the following other companies: Engineering Systems Group, Inmaa Company, Al-Bowtaka Company, Buraq Company, Falsafah Company, Julia Dumna and Martini for Tourism Investments, Julia Dumna for Commerce and Marketing, al-Khayr for Investment, al-Oula for Real Estate Development and Investment, and Sien Company.

Khaldoun Makhluf also owns the Shahbandar Palace hotel in Damascus, the Coral Julia Dumna in Aleppo, the Julia Dumna restaurant in Damascus, and the Airport Taxi Company, as well as 10 million shares in the Emirati Air Arabia Company.[1] In July 2018, the Ministry of Tourism granted him a Tourism Qualification License at a cost of 750,000 Syrian pounds to establish the Coral Julia Dumna hotel in Damascus, which is to be administered by the Coral International Company.

As for official positions, Khaldoun Makhluf has worked as Commercial Manager for Syrian Air and was president of the Syrian-Jordanian Business Council.

Khaldoun Makhlouf's capital comes from two main sources. His first source of capital comes from funds raised through his father 'Adnan Makhlouf's corruption, bribes, and blackmail activities committed under the cover of Basil al-Asaad. The second source is Rami Makhluf, the economic Leviathan of Syria, who distributes his investments to a large number of individuals to camouflage his business activities. Muhammad Firas Mansour, a former Public Relations employee of the Makhluf Commercial Group, confirmed this by claiming that "The company that Rami Makhluf runs is not a single company; it is a group of separate but interconnected companies. Rami Makhluf sits at the top of the pyramid, registering his companies in the names of relatives to dispel suspicion concerning his capital. Good examples of this practice are the Hani Makhluf Economic Group led by Hani Makhluf, and the Ramak Economic Group, which also owns a number of airplane, ship, and car companies.[2]"

(1) Air Arabia, http://tiny.cc/h28a7y
(2) Sada al-Sham, "New Secrets About Rami Mahluf's Economic 'Empire,'" http://tiny.cc/i41a7y

Upon the outbreak of popular protests in March 2011, Khaldoun Makhluf established Shabiha groups in the city of Aleppo in partnership with the sons of former Minister of Irrigation Muhammad Radwan Martini. With the Martini family, Khaldoun Makhluf paid monthly salaries to shabiha fighters, provided them with light weapons, and then conscripted them into regime-aligned militias. These armed factions committed horrible violations against civilians in the city of Aleppo. Khaldoun Makhluf also helped form shabiha groups in the city of Lattakia, and he commands these groups personally.

'Adnan Makhlouf's partnership with the Martini family began amidst efforts to launder money from Iraq starting in 2003. Khaldoun Makhluf is not just a businessman who has employed capital that raised by his father under questionable circumstances. Khaldoun also helped Rami Makhluf circumvent sanctions, acting as a commercial façade for Rami and avoiding being subjected to sanctions himself. Khaldoun spends his time and business between Syria, the UAE, Russia, and EU member states, where he engages in his dubious business activities without impediment.





Hussam Ahmad Qaterji

Place of Birth:
Raqqa1982

Member of the Syrian parliament. Accused of smuggling oil tanks from the Syrian Al-Jazira district to the regime-controlled areas.

Chairman of the Board of Directors of the "International Group of Al-Qatirji", which manages Rami Makhlouf's business.

Engagements: He established a local militia which committed violations against the Syrian people, fought alongside the "Kurdish Protection Froces" (YPG) in Afrin, and participated in the siege of Eastern Aleppo in 2016.

Sanctions: Subject to European sanctions since January 2019, for his role in providing oil derivatives and wheat for ISIL and the Syrian regime.

Syrian businessman Hussam Ahmad Qaterji was born on 11 January 1982 in Raqqa Governorate. He is currently CEO of Qaterji International Group, which includes a large number companies specializing in a variety of fields. These companies include Jouzour for Agriculture and Livestock, Qaterji for Commerce and Transportation, White Gold Industrial Company, Alep for Security Solutions and Studies, Asl for Investment and Contracting, Golden Gate for Tourism and Transportation, Qaterji for Real Estate Development and Investment, and Rubou al-Jazeera Import-Export. But most of these companies actually belong to Rami Makhluf, Bashar al-Assad's cousin.

Qaterji is also an independent member in the Workers and Farmers' section of the Syrian People's Assembly. He represents

Aleppo Governorate in the Second Legislative Session of 2016-2020.

The Qaterji Group, headed by Hussam Qaterji, acted as an intermediary for the regime with ISIS and the YPG. This group was responsible for supplying regime-held areas with wheat and oil that originated in ISIS-controlled territory and passed through areas under Kurdish YPG control.

The Qaterji Group also filled the vacuum left by the George Haswani Company's withdrawal from the region. The Qaterji Group ensured the transportation of crude oil from the 'Umar field. More than 1,000 tanker trucks, each of which contained around 170 barrels of oil and weighed 35 tons, serviced this oil field. Of these, the Qaterji Group owned around between 300 and 400 tanker trucks. (Of the remainder, 300 were owned by the Ayyam al-Khayr Company and the rest belonged to other individuals.) Through this transportation network, Qaterji supplied the regime with around 20,000 barrels of ISIS oil per day. He also engaged in a reverse trade in foodstuffs and other supplies, such as iron and building materials, which were destined for ISIS and the YPG.

Reuters published an investigation of Qaterji Group's role in oil provision on 11 October 2017, titled "How a businessman struck a deal with Islamic State to help Assad feed Syrians."(1)

Under the aegis of his partnership with Rami Makhluf, the Qaterji Group also provided services to regime-aligned fighters, injured fighters, and the families of fighters who had been killed. Hussam Qaterji also commanded a regime-aligned

(1) Reuters, How a businessman struck a deal with Islamic State to help Assad feed Syrians, https://www.reuters.com/article/us-mideast-crisis-syria-wheat-islamic-st/how-a-businessman-struck-a-deal-with-islamic-state-to-help-assad-feed-syrians-idUSKBN1C-G0EL

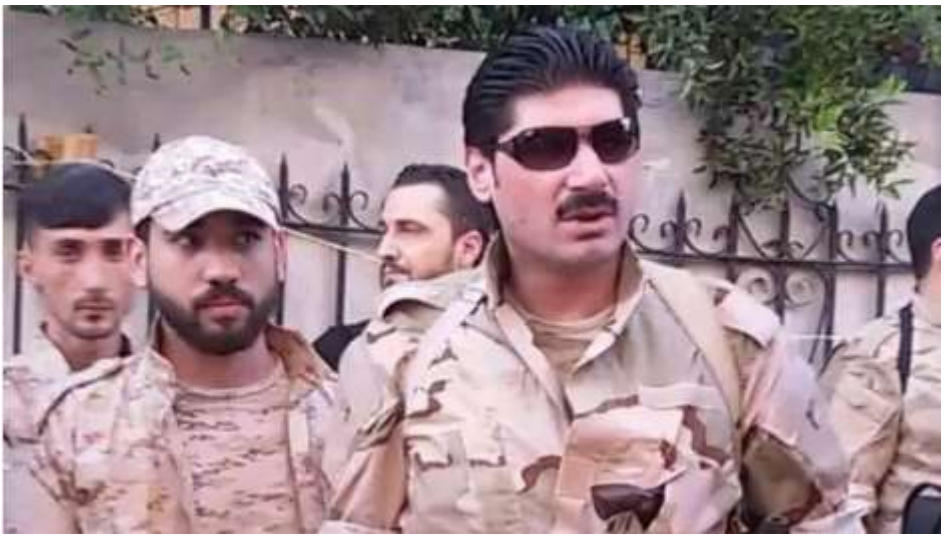
militia, known as the “Qaterji Group,” based primarily in Aleppo Governorate. This militia participated in the military operations that led to the siege and capture of eastern Aleppo at the end of 2016, and the resulting killing and displacement of thousands of Syrians.

The “Qaterji Group” militia also fought alongside Popular Defense Forces and the YPG against the Turkish army and the Free Syrian Army in the Afrin area during Operation “Olive Branch.”

Now a Damascus resident, Hussam Qaterji is one of the most prominent businessmen who support the Al-Assad regime, given his partnership with Rami Makhlouf. He uses his family members as commercial interfaces to work within his subsidiary companies, including his brothers Muhammad Bara and Muhammad Agha Qaterji. In addition, Qaterji has been subject to European sanctions since 21/1/2019 because of securing oil derivatives and wheat in favor of the Syrian regime.[1]



(1) See https://eur-lex.europa.eu/legal-content/en/TXT/PDF/?uri=CELEX:32019D0087&-from=EN.





Ayman Jaber

Occupation: Son-in-law of Kamal Al-Assad (Bashar al-Assad's cousin). Established an Iron and Steel Assembly company which paved his way to enter the pledges and contracting sector in Syria.

Owns the "Steel Rolling Company" in Jableh, partner in the "Addounia" television. Ownes several transportation and energy companies in Lebanon.

Engagements: Involved in forming militias such as the "Desert Falcons" and "desert Commandos", which were involved in committing atrocities against the Syrian people.

Sanctions: Subject to US and European sanctions, due to his support and financial aid to Assad's militias.

Ayman Jaber had not been known before the revolution in Syria, except maybe for the Assad family. Jaber shared a life of poverty with his parents, three brothers, and two sisters in the village of al-Shilfatiyah in rural Lattakia. He became involved in smuggling, and became acquainted with Fawaz al-Asaad, who dominated the port of Lattakia and imposed fees on goods entering and leaving Syria.

Jaber quickly gained prominence. His relationship with Maher al-Assad strengthened through Jaber's marriage to the daughter of Kamal al-Assad, Bashar al-Assad's cousin.(1) This marriage alliance opened the gates for illicit business opportunities. Jaber began amassing a huge fortune smuggling of tobacco

(1) See Russia Today, https://bit.ly/2NAKWsi

and oil for the Iraqi regime in the 1990s. Jaber made his wealth through the "Oil for Food" program, smuggling Iraqi oil "outside the UN program" through the port of Lattakia and Tartous in the interest of the Saddam Hussein regime.

This business aided him in founding the Council for Iron and Steel in Syria, investing in contracting operations, and helping found the Cham Holding company, owned by Rami Makhluf, Assad's cousin. Jaber also helped found the al-Dunya satellite channel, and owns the Arab Iron Milling Company in the Jableh area. He was also a member of the Arab Iron and Steel Union, and was honorary president of the Wafaa lil-Watan Association (Loyalty to the homeland), which provides aid and support to the families of regime fighters killed in the war.

Jaber owns a number of companies in Lebanon, the most prominent of which are al-Jazeera al-Muttahida for Public Transport, Commerce in Oil Products, and Oil Services; Arab Energy Company and al-'Arabiya al-Muttahida for Public Transport, Commerce in Oil Products, and Oil Services.

Because of his financial activities and his support for militias, the United States(1) and the European Union(2) have listed him on their economic sanctions lists. His funds and assets have been frozen and he is prevented from traveling.

With the outbreak of popular demonstrations in March 2011, Ayman and his brother Muhammad formed "National Defense" brigades under various names. The most important of these were Suqur al-Sahra' and Maghawir al-Bahr. Jaber paid these militias fighters, and is also accused of converting his ironworks

(1) See the Treasury website, https://www.treasury.gov/press-center/press-releases/Pages/tg1797.aspx

(2) See The Syria Report Website, https://www.syria-report.com/trending-content/Ayman%20Jaber

in Jableh into a factory for barrel bombs, which Assad used to bombard opposition areas.

Sources indicate that Ayman Jaber was involved in violations against civilians in Lattakia, where his militia engaged in arresting hundreds of youths, besieging the Palestinian al-Raml area, engaging in criminal behavior, expropriating real estate, and forcing the owners of commercial establishments to pay fees to him and his men.(1)

The criminality of Jaber's militias led Bashar al-Assad to summon him to Damascus in 2016 and warn him that all of his movements were under surveillance. This led Jaber to strengthen his relationship with the Russians, who provided advanced training to his militia, Suqur al-Sahra'.(2) Russia also depended on these militias in the battles for the deserts of Palmyra and al-Sha'ir, and in the battles for Raqqa and the eastern Homs countryside. Jaber and a number of his fighters were given honors by the leader of Russian forces in Syria, Alexandr Dvornikov, following the seizure of control of over the village of Raba'iyyah in the Lattakia countryside by Assad's forces.

The militia also received significant support from the Iranian Revolutionary Guard. There are recordings of its fighters repeating sectarian slogans. Sources indicate that the militia was trained in 2013 by the 47th Brigade of the Iranian Revolutionary Guard, which has a base in the city of Hama.

The corruption of Jaber and his brother Muhammad have caused international embarrassment for the regime. The

(1) See Baladi News Website, https://bit.ly/2ucScDH.
(2) Ibid.

“Paradise Papers” published by Germany’s Süddeutsche Zeitung newspaper, on November 2018, revealed their involvement in tax evasion as shareholders of Lebanon’s Offshore Company.

Jaber’s relationship with the Russians and Iranians led Bashar al-Assad to quash Ayman Jaber and break up his militias. Jaber was arrested in May 2018 amidst a security campaign launched by the regime in the city of Lattakia that aimed to arrest individuals wanted by law enforcement, corrupt individuals, and bribe-takers. Jaber is still under house arrest in one of his homes.



Fares Ahmad Al-Shihabi

Place of Birth:
Aleppo, 1972

Member of the Syrian Parilament, and later appointed as head of chamber of Industry in Aleppo by reocmmendation of Major General Tawfiq Younes former head of internal security for the intelligence directorate in Aleppo.

Owns "Alpha company", a gigantic pharmaceutical company in Syria, and co-founder of many other companies.

Engagements: Established and funded a militia of about /5000/ mercenaries (Shabiha) who participate in the crackdowns against the Syrian people. Suprevised a technical programme to produce remote controlled military vehicles to support the Syrian army's repressive campaigns.

Sanctions: As a result of his support and prticipation in the violations committed by the regime he is subject to European sanctions.

Fares Ahmad Shihabi (born in Aleppo in 1972) developed his business after receiving a Master's Degree in Industrial Engineering from the University of Ohio. He established Alpha for Pharmaceutical Manufacturing, which operates seven factories and has dominated the pharmaceutical market in Syria since 1993. Shihabi established and participated in the establishment of numerous other companies, the most important of which are Cham Holding Company, Fransabank Souriya, al-Sharq Souriya Bank, the Syrian Arab Insurance Company, al-Jazira for Commerce LLC, Qala'ah for Real Estate Development and Investment, and al-Ghad al-Afdal for Investment. With the support of Brigadier General Tawfiq Yunes, former president of the State Security branch in Aleppo, Shihabi became the president of the Aleppo Chamber of Industry despite his young

age. He was also elected as a Member of Parliament for the 2016-2020 session.

With the outbreak of peaceful protests in March 2011, Fares Shihabi dedicated his money and factories to supporting the regime. Shihabi provided financial support to shabiha groups by funding roughly 5,000 fighters from his personal wealth. He placed special strategic reserves in his factories under the command of the government in order to provide medicine for free to the Syrian army. He also assisted regime institutions with importing special primary goods to manufacture medicine and evade sanctions.

In exchange for those services, the Assad regime turned a blind eye to the corrupt practices in which Fares Shihabi was embroiled. He was accused of importing nearly-expired medical goods, for instance, and of importing narcotics used in pharmaceutical manufacture to smuggle them onto the domestic market. This made him millions of dollars.

Simultaneously, Fares Shihabi emerged as one of the most prominent individuals calling for the killing of opponents of Bashar al-Assad. He has called for the use of heavy weapons against the Syrian people, especially in the Aleppo countryside. He has appeared on television channels and social media to show his loyalty to the Syrian regime. In 2014, he appeared in an interview with al-Mayadin carrying a Russian-made rifle, threatening anyone who opposes Assad. He is known for his encouragement of looting, and for the leniency with which he deals with shabiha fighters.(1)

(1) YouTube: https://youtu.be/YifAHeazhKo

Shihabi has worked with the Aleppo Chamber of Industry to produce a number of remote control military devices for the Syrian army.(1) He has also provided treatment for injured regime fighters in Aleppo. He is also known for recruiting individuals who had been dismissed from the army,(2) promising to guarantee business for them after service of eight years in exchange for the "favor" that they will have done for the regime.

As a result



(1) *Al-Quds al-'Arabi*: https://goo.gl/YYcDhc
(2) Those dismissed from Military Cycle No. 102.



of his support for – and direct participation in – the repression efforts undertaken by the regime, Shihabi is subject to European sanctions.(1) Nonetheless, he still carries his American nationality. He even appeared in public in 2016 inside the United Nations building in New York with the Syrian permanent representative to the United Nations, Bashar Ja'fari.

(1) His rank in the European sanctions is 49.



Samer Zuhair Foz

Place of Birth:
Lattakia, 1973

Engagements: Fawz built an international business network for the benefit of the Syrian regime to evade international sanctions.

Heads 'Al-Fawzz Holding Group' which dominates a large part of the commercial business activity in Syria, and has other companies in the Netherlands, UAE, Lebanon and Turkey.

Funds the 'Military Security Shield' militia which is connected with the Military Intelligence Directorate, the perpetrator of the repression and widespread violations In Damascus, Aleppo, Hama, and Lattakia countryside.

Businessman Samer Foz was born in Lattakia in 1973 to a merchant family. In 1988, his father Zuhair established the Foz Holding Group, which imported and exported food products. He expanded his activities to include the fields of real estate and media, establishing the Aman Holding Group and its subsidiaries: Foz for Commerce, Muhaymin for Transportation and Contracting, Suruh for Construction, and the Easy Life Company. He also founded the Foz Charitable Association, which is active in Lattakia city and the Lattakia countryside.

Samer Foz is CEO of the Foz Holding Group. He also owns the Offshore company, headquartered in Moscow, in addition to companies in Holland, the UAE, and Lebanon. The Foz group is active in import-export: Aman Company, for instance, imports

50,000 tons of cement per month from Turkey to Syria, and distributes Portland cement produced in a factory near 'Ayn al-'Arab by the French La Farge company. The Foz group also exports Renault trucks to Iraq.

Samer Foz has major business in Turkey. He owns a mineral water factory called Mecidyia in Erzurum, as well as warehouses and silos with a capacity of 150,000 tons in Iskenderun. He has invested in a gold mine south of Ankara, and has also invested in hospitality: the Foz group is currently working on a five-star hotel in the Bodrum region and residential complexes in Istanbul.

Foz was imprisoned in Turkey in 2013, under the accusation of participating in the murder of an Egyptian-Ukrainian businessman named Ramzi. Foz was held in prison for four years, but was released after serving only six months of prison time. He paid a bail bond estimated at 3 million USD, according to a report by the Milliyet newspaper on 24 October 2013.(1)

Despite Foz's criminal record, the Foz Group has continued to expand in Turkey. In 2017, the company announced the establishment of a fertilizer and livestock factory at a value of 60 million USD, occupying 80 acres in the al-'Aziziyah area of Erzurum. The factory is expected to open in May 2018 in the presence of a number of Turkish political leaders. Samer Foz also holds Turkish nationality.

In Syria, Samer Foz gained prominence after acquiring the shares of competitors who had exited the arena. These included the Ghreiwati Group and the Hamsho Group, which was listed on the European sanctions list and then had its assets were frozen

(1) See Turkish Milliyet, at http://www.milliyet.com.tr/gundem/cesedini-kopeklere-yedir-diler-1781649.

by the regime because of its failure to pay back a loan of 3.8 billion Syrian pounds. This allowed the Foz Group to acquire the assets of companies belonging to 'Imad Ghreiwati and Muwaffaq Qaddah. The Foz Group thereby came to dominate the sugar and automobile markets, especially the Hyundai and Kia brands. It also gained sole agent status for several Iranian companies, became involved in the manufacture of cables and pharmaceutical products, and established two iron workshops: one in Hissieh, Homs, and another in Darfalah, Lattakia, with a productive capacity of around 1.5 million tons. Foz aims to win government contracts for the upcoming reconstruction phase, and to secure licenses to purchase metal fragments from destroyed buildings in Syria's cities and towns.

Samer Foz owns the Mashriq restaurant and event space in central Damascus, which is attended by elite regime figures. The Aman Holding Company also acquired the Marota City project in the Basatin al-Razi area near the Mezzeh neighborhood of Damascus. This project is controversial because it is based on Presidential Decree No. 6 of 2012, which allows the expropriation of homeowners' property in Damascus. The project is also based on Legislative Decree No. 19 of 2015, which enables the establishment of private joint-stock holding companies to administer assets inside the administrative boundaries of governorates and cities. Legislative Decree No. 19 is seen as a means of transferring private lands in key locations to regime cronies.

In August 2017, Foz announced the establishment of the MENA Company, with an estimated capitalization of 25 billion Syrian pounds, to build a sugar refinery near Homs. This refinery will have a capacity of 3,500 tons per day, or the equivalent of one million tons per year. In November of the same year, Foz also established a pharmaceutical factory in the industrial

city of ‘Adra, outside of Damascus, to produce cancer drugs with licenses from Canadian and South Korean companies. This factory is valued at 28 million Euros.

In 2018, the Foz Group acquired a 55% share – which had previously belonged to Saudi billionaire Prince al-Walid bin Talal – in the Four Seasons hotel in Damascus, which has hosted major United Nations employees and visiting diplomats since its founding. In April of the same year, it was also announced that a new private airline called Fly Aman was being established. This airline is owned by Khaldun Zu’bi and Bashar Muhammad ‘Asi. Samer Foz’s was not listed as a participant in this venture. But Khaldoun Zoubi is Vice President of Aman Holding Company, and ‘Asi is CEO of Aman Damascus. In the same month that Fly Aman was announced, Foz indicated that he had signed an agreement with the Korean automobile giant, Hyundai, to sell and distribute commercial vehicles. The I Motors company will assemble these vehicles in Syria. This is the fourth agreement of its kind, following the 2017 agreement to assemble the automobiles from the Chinese commercial car brand BYD from semi-disassembled parts (“semi-knocked-down kit”). Samer Foz also owns the license to assemble Toyota and Kia cars.

According to a report by the American website, “The Daily Beast,” a Trump campaign funder, Brian Ballard, purchased ASM International General Trading, which belonged to the Foz group of companies, in March 2018.[1]

Through this wide-ranging international economic activity, Samer Foz’s group of companies aids the regime in avoiding economic sanctions imposed by the European Union and

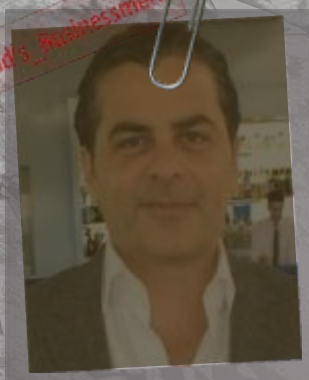
(1) See the Daily Beast, Top Trump Fundraiser Caught Working for Assad Ally, at https://www.thedailybeast.com/top-trump-fundraiser-caught-working-for-assad-ally?ref=scroll.

certain states. The regime has endeavored to evade sanctions by relying on businessmen like Samer Foz, who are not included in the sanctions lists and are used to establish secret relations with various states.

As for military matters, Samer Foz funds the Military Security Shield Forces militia,[1] which is linked to the Air Force Intelligence Directorate via the Lattakia office known as "Branch 223." This militia participated in the assault on the Salma district in the northern Lattakia countryside alongside the Suqur al-Sahra', Liwa' Assad Allah al-Ghaleb, Liwa' Usud al-Hussain, Nusur al-Zubi'ah, and National Defense militias. The Military Security Shield Forces militia also participated in battles for Kinsabba in the northern Lattakia countryside, and in battles for Castello Road. The latter battles aimed to complete the encirclement of Aleppo and aided in the assault on the city, leading to the deaths of more than 1,300 civilians and the displacement of over 100,000 others.

Foz's militia also participated in operations in Hama Governorate, and in battles in Damascus and Rif Damascus. Samer Foz provided headquarters, aid, and commercial facilities in support of regime forces, including especially his own Military Security Shield Forces militia. This group committed horrifying massacres that killed hundreds of civilians. Its fighters also committed acts of theft, looting, kidnapping, and blackmail.

(1) See Noon Post Website, at https://www.noonpost.com/content/26155.



Amer Foz

Place of Birth:
Lattakia

Samer Foz's brother and his business associate, known for taking a third of any deal's amount conducted by his brother Samer in favor of the Syrian regime.

Directs "ASM" International Company, founder of "Amer Foz & Partners", partner in "Aman Holding" group, and in "Al-Bunn" company for cables and plastic manufacturing.

Engagements: Accused of providing weapons and munitions to ISIL in return for wheat and oil, for benefit of the Syrian regime. Considered as a prime participant in many crimes and violations committed by "Military Security Shield" militia which is connected to the Military Intelligence Directorate.

Amer Foz received a B.A. in Business Administration from the American University of Paris in 1993. He received an M.A. in Business Administration from the same university in 1996. He is the son of businessman Zuhayr Foz and the sibling of Samer Foz.

Amer Foz was not engaged in any known commercial activities before 2011. But Foz rose to prominence due to the regime's need for loyal figures who would help it evade international sanctions. Foz became the CEO of ASM International General Trading, a major company in the field of international commerce. ASM International General Trading is active in the MENA region and Turkey, and is headquartered in the United Arab Emirates. The company specializes in perishable food products, agricultural feeds, and durable goods such as heavy metals, as well as energy transmission and energy infrastructure investment. It

operates assets in the fields of logistics, storage capacity, and the wholesale supply business on both sides of transactions with a network that includes numerous international offices as well as treatment and transportation facilities.

Amer Foz is a founding partner in the Amer Foz and Partners Company, the Aman Holding Group (controlled by Samer Foz), and al-Buna al-Ra'ida for the Manufacture of Cables and Plastic Granules. Amer Foz owns 5% of the capital of this company, District LLC (registered in the African republic of Seychelles) owns 70%, and 'Ahd for Commerce and Investment owns 25%. He is a partner in the Easy Life Company, and is a board member and founding partner of the Syrian Cable Company.

Amer has held a number of prominent positions, including Managing Director for Aman Holding Group, Deputy Managing Director for Aman Holding Group, and Deputy Managing Director for 'Imar for Manufactured Goods.

Companies connected to Amer and his brother Samer implement a number of projects in the 'Adra al-'Ummaliyya area. The most important of these include a project to produce electricity using solar power and a factory that manufactures cables and cable accessories.

Sources indicate that Amer Foz takes a third of the value of contracts implemented by his sibling Samer on behalf of the regime. This is because Amer owns 33% of Aman Holding Company, which has implemented a number of massive projects and contracts in the recent past. The most important of these are:

- The purchase of 8,949,842 shares of Syrian Islamic Bank.

- The purchase of 592,250 shares of Bank al-Baraka-Syria. Following this purchase, Aman Holding Company held 604,887 shares of Bank al-Baraka.
- The purchase of Nadi al-Sharq, at a value of 12 million USD.
- The purchase of 1.5 million shares in Syrian Islamic Bank, at a value of 1.28 Syrian pounds.

Participation in the implementation of a portion of the Marota City project. This project is being implemented upon the rubble of homes acquired by the regime, located behind al-Razi in the al-Mazzeh neighborhood of Damascus, following the displacement of the local population.

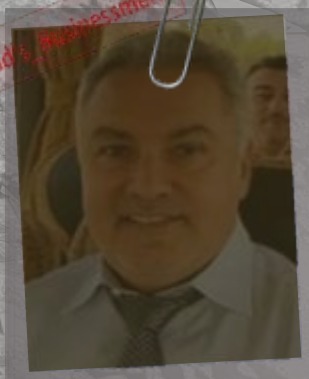
Amer Foz and his brother Samer are both accused of providing weapons and ammunition to ISIS on behalf of the regime in exchange for wheat and oil. This trade purportedly took place when ISIS controlled all of eastern Syria. An ISIS leader, Ahmad al-Hijji, confirmed that Amer and Samer engaged in various commercial activities with ISIS on the regime's behalf. The brothers also purportedly signed secret deals with the Kurdish Democratic Union Party (PYD) for the regime.(1)

Aman Holding Group, owned by Amer and Samer Foz, is considered the exclusive agent of the Syrian regime in acquiring property from regime opponents, for instance in the purchase of Saudi prince al-Walid bin Talal's share of the Damascus Four Seasons, and the purchase of the property of businessmen such as 'Imad Ghiwati and Muwaffaq Qaddah. Aman Holding Company acted as the commercial façade for the acquisition of capital for the regime and the legal appropriation of property per Legislative Decree No. 19 of 2015.

(1) See Souriyetna Website, at https://bit.ly/2kUzyMC>

The Foz family owns a major proportion of Syria's commercial sectors, and have business interests outside of Syria as well. Their business interests in Syria include iron workshops, buildings, pharmaceutical factories, airline companies, real estate services, agencies for the importation and assembly of automobiles, and sugar refineries, in addition to sectors connected to reconstruction.

It is worth noting that Samer Foz participated – through Aman Holding Company – in supporting the Military Security Shield Forces militia, which is under the command of the Air Force Intelligence Directorate. Amer's brother Samer shares responsibility for the crimes and violations committed by this militia.



Muhammad Hamsho

Place of Birth:
Damascus, 1966

A member of the Syrian parliament and Maher Al-Assad's most prominent business agent.

Owns and manages several companies including 'Hamsho Group' for International Communications, 'Middle East Information Technology Marketing Company', and 'Syria International Company for Art Production'.

Engagements: Involved in money laundering and accused of smuggling goods to ISIL and other terrorist organisation.

Sanctions: Subject to US and European Union sanctions.

Muhammad Saber Hamsho was born to a poor family in the city of Damascus in 1966. Hamsho's father worked as a storekeeper for the Ministry of Education. His mother is descended from an 'Alawi family in a village in Qardaha.

After receiving his university degree in the field of Electrical Engineering, Muhammad Hamsho began to work for a computer equipment and communications devices company owned by Mudar Hawijah, son of former director of Air Force Intelligence Major General Ibrahim Hawijah.

Hamsho's work quickly evolved, and came to involve covering up the private business activities of regime cronies. Hamsho sold computers and communications equipment to the leadership of the Syrian Air Force and Syrian Air Defense Force through a bilateral agreement. The law stipulates that all state

institutions must make purchases through the auction system, but Major General Ibrahim Hawijah used security concerns as an excuse to refuse to make purchases through an auction and instead complete the deal with Muhammad Hamsho.

In addition to Major General Hawijah, Hamsho established a relationship with 'Ammar Sa'ati, calling upon him to connect Hamsho to Sa'ati's close friends, Bashar and Maher al-Assad. Hamsho also established a relationship with Maher al-Assad's office manager, Brigadier General Ghassan Bilal. Hamsho paid Bilal a 5 million pound bribe to secure an introduction to Maher al-Assad. This successful bribe enabled Hamsho to implement the first of his projects on behalf of Maher al-Assad through the Buraq Company, which is involved in land-line telephone communications and operates booths in major cities. This deal helped Hamsho establish and manage numerous companies on behalf of Maher al-Assad, including Hamsho Group for International Communications, Buraq for Advertising and Media, Middle East for Technology and Information Marketing, Sham for Engineering Studies and Contracting, Jupiter for Touristic Projects, Syria International for Technical Production.

Hamsho also became an agent for the Thuraya corporation in Syria, and was recently elected as a member of the People's Assembly. He is currently Secretary of the Damascus Chamber of Commerce and the Union of Syrian Chambers of Commerce.

Hamsho has coordinated with his brother-in-law, Raslan al-Khayyat – owner of Khayyat for Commerce and Contracting – to avoid international sanctions.

Sources claim that Muhammad Hamsho's paid armed opposition factions in Ghouta including Jaysh al-Islam, Faylaq al-Rahman, and Jaysh al-Ummah (before it was disbanded) to

remove factory equipment located in areas that these factions controlled. He also coordinated the opposition's movements and efforts to smuggle goods. It eventually became clear that these activities contributed to ambushes prepared by the regime in coordination with Hamsho, who had established an array of relationships with political opposition figures in Egypt and other Arab states. These relationships enabled Hamsho to engage in a number of secret roles, including in negotiations in the 'Arsal region of Lebanon.

Muhammad Hamsho is subject to U.S. and European sanctions (which were removed and then re-imposed) because of his participation in money laundering and commercial activities on behalf of the regime. These sanctions have led to the diminution of Hamsho's activities, and to the acquisition of his businesses by the Foz and Tarazi families, especially in the fields of iron and metals.



Amjad Douba

Birth: 1969

Son of "Muhammad Duba" the former brigadier general in the Syrian army, and the nephew of General "Ali Duba", the former head of the Military Intelligence Directorate.

Considerd as a a major regime's business agents in Russia wher he enjoys inflence in political and business circles.

Owns several companies including 'AMPA' and a key partner in the 'Ugarit' commercial company for soft drinks.

Engagements: Accused of money laundering for the benefit of the Syrian regime through a network of international compnaies.

Amjad Douba was born in 1969. He is the son of former Brigadier General Muhammad Douba, and the nephew of Lieutenant General 'Ali Douba, former director of the Military Intelligence Directorate under Hafez al-Assad.

Before he was 18, Douba was sent as part of a student delegation to Russia in 1986 to benefit from the positions of his father, Brigadier General Muhammad Douba, and his uncle, Lieutenant General 'Ali Douba. In Russia, Douba studied Urban Planning and started his first commercial enterprise. He attempted to present himself as a self-made man who had started with nothing. As Douba once said in an interview, "I was so happy when I returned to Syria with my first commercial deal, which I secured as student. I think that the value of this deal was

no more than 200,000 Syrian pounds – which was nothing in dollars at the time – and involved trade in basic goods."(1)

After graduating, Douba settled in Russia in the early 1990s. He widened his commercial activities, becoming especially involved the exportation of foodstuffs and dry goods to Russia, and supplying Syria with iron and wood.

Douba also purchased several commercial stores, repaired them, and re-invested in them directly or by renting them out. He then entered the following fields: media, restaurants, coffee, tourism, and travel. Douba has been considered one of the founders of the Syrian expatriate community in Moscow since it held its first conference.

Hassan 'Abd al-Rahman, managing editor of Entrepreneur al-'Arabiyyah, interviewed Amjad Douba in 2017. According to Rahman, "It is very difficult to glean any information on how he got started, on his current business activities, or on how he raised his capital. It seems that his real prestige isn't in what he has accomplished on the financial end of things, but rather the friendships that he has made, which make him one of the most prominent Arab citizens in Moscow."(2)

Sources confirm Amjad's dependence on capital accumulated by his father, Muhammad Douba, gathered when he was head of the Military Intelligence Directorate in Aleppo between 1974 and 1979. Muhammad Douba accumulated his wealth through administrative corruption, bribes, and fees that he imposed on the people of Aleppo. He also acquired illegitimate oil wealth during his appointment as president of an oil storage company

(1) *Entrepreneur al-'Arabiyyah*, "Amjad Duba: The best investment is not the most expensive," https://goo.gl/GTAVco
(2) Ibid.

in Tartous, and during an 11-year stint as director of the Syrian Petroleum Company.

Brigadier General Muhammad Douba is also accused of being involved in smuggling Iraqi oil to Israel through the Haifa refinery. Douba was acquitted of this crime, while others were convicted and secretly executed in Damascus.

Amjad Douba is considered a major partner in Ugarit for Commerce, which specializes in the manufacture of carbonated drinks and juices. He owns a number of companies, the most important of which is Amba for Commerce, which he directs in partnership with Bushra 'Ali Ismai'il. He is a general manager and founding partner of Imdad for Commerce and Distribution, Tajawwul for Travel and Organizing Touristic Trips, and other companies through which he has achieved favorable commercial agreements with Russia – especially in citrus exports – by exploiting his father's commercial influence.

Amjad Douba is accused of employing his companies to launder money for the Syrian regime. He is a trusted façade for the regime in Russia. Although he works there as a resident and businessman, informally he enjoys a higher station than an ambassador.



Samer Ali Duba

Place of Birth:
Damascus

He is the son of Brigadier General Ali Duba, the former head of of the Military Intelligence Directorate and the henchman of Hafez al-Assad. Heavely involved in laundering the money his father snatched while he was the head of the Military Security Service.

Co-founder in the "Amanet Hayir Syria" company, a general manager of the "Kawalys" company, a general manager and co-founder of "Zuhal" company for advertising services.

Samer Duba manages and operates the cash that his father earned by corruption and fund collections during a quarter century when he was the head of the Military Intelligence Directorate; in addition to helping the Syrian Regime avoid international sanctions.

Samer Ali Duba was born in Damascus. He is the son of Lieutenant General Ali Duba, who was head of the Military Intelligence Directorate and the right-hand man of the president during the Hafez al-Assad era. In 2012, Samer began to manage his father's wealth following the disappearance of his older brother, Muhammad Duba, in the city of Lattakia in May 2012 in obscure circumstances.

Samer Ali Duba is a founding partner in the Amana Khayr Syria Company, general manager and founding partner of the Kawalis Company, and general manager and founding partner of Zuhal)Saturn) for Advertising and Media Services. These companies, which were mostly founded in the 1990s, constitute a commercial façade meant to cover the illicit sources of the wealth managed by Samer on behalf of his father Lieutenant General Ali Duba, which he gathered over the quarter century

in which he led the Military Intelligence Directorate. Across this period, Ali Duba established a state within the state and made his living through corruption, extortion, and forced partnerships with businesspersons, in addition to oil money to which he had access through his brother's eleven-year leadership of the General Petroleum Corporation.

Ali Duba played the most important role in removing Abdul Rauf al-Kassm from the premiership and installing Mahmoud al-Zoubi in his place. Zoubi was obedient to Duba, who during this period was active in smuggling supplies, consumer goods, electronics, and building materials from Lebanon. He was also involved in the arms trade, and collected millions of dollars through bribery and corruption. He then deposited these funds in European banks.

Following close partnerships with Rami Makhluf and Muflih al-Zoubi (son of the very Mahmoud al-Zoubi) to smuggle Iraqi oil with Maher al-Assad, and Maher's subordinates Khaled Qaddur, Muhammad and Ayman Jaber, and others, Ali Duba established private businesses through his son Samer, who acted as a commercial façade to manage the dirty money that his father had collected during his stint leading Military Intelligence.



Lieutenant General Ali Duba with his brother, Brigadier General Muhammad Duba



Majd Bahjat Suleiman

Occupations: Son of Major General Bahjat Suleiman, a prominent figure in the Syrian intelligence the previous director of Rifaat al-Assad's office.

Executive director of alwaseet international group (AWA) international Group, and a shareholder in the 'United Group for Advertising and Publishin'", which publishes many local and regional newspapers and magazines such as'(Layalina', 'Baladna' and 'Al-Waseela'.

Engagements: Accused of money laundering and conducting a propaganda campaign for the benefit of the Syrian regime and to justify the violations committed by the regime.

Majd Suleiman is the scion of Major General Bahjat Suleiman, the nephew of Hafez al-Assad, who was born to a Murshidi (a sub-division of the Alwi Sect) father and an 'Alawi mother. Bahjat graduated from the Military College and enrolled in the Defense Companies,[1] which were led at the time by the criminal Rif'at al-Assad. Bahjat became Rif'at al-Assad's office manager and security officer for the Defense Companies. He then became one of the pillars of the Syrian intelligence services and one of the engineers of Bashar al-Assad's assumption of power. Bashar appointed Bahjat ambassador to Jordan, from which Bahjat was eventually expelled.

(1) Defense Companies: A sectarian regime unit that has committed the worst massacres in the 1980s, and subsequently after the departure of Rif'at al-Assad from Syria were renamed the Fourth Division, led by Major General Rif'at al-Assad, the brother of Bashar al-Assad. The Fourth Division committed many massacres against the Syrian people throughout Syria since the beginning of the Syrian revolution in 2011 until the present time.

Majd Suleiman represents the commercial façade for his father Bahjat,[1] who amassed huge fortunes of money derived from his corrupt activities by charging anyone who wanted a meeting with Rif'at al-Assad. He also engaged in theft of building materials like cement, iron, and other materials, selling these materials to merchants on the black market, as well as smuggling between Syria and Lebanon and stealing weapons from Defense Companies armories and selling them to warring factions in the Lebanese civil war.

This situation continued until after the departure of Rif'at al-Assad from Syria, when Bahjat Suleiman gained the position of deputy head of the foreign branch in the General Intelligence Directorate after reporting Rif'at al-Assad's plan to Hafez al-Assad.[2] He subsequently became the head of Branch 300 of the General Intelligence Directorate, and worked closely with Basil al-Assad to prepare the groundwork to enable Basil to assume power from his father. He played the same role with Bashar al-Assad upon Basil's death, allowing him to continue imposing his authority over licenses in state ministries and directorates.

In 1998, Bahjat Suleiman – through his son Majd – imposed a partnership upon a Syrian-French businessman resident in Kuwait, Bashar Kiwan, owner of the newspaper al-Waseet in Kuwait and the Gulf states. Bashar Kiwan and Majd Suleiman's partnership began with the launch of the United Group for Media and Publishing, which specialized in the publication of a number of technical and advertising newspapers and journals in Syria and other Arab states. These included Layalina, Baladna, Top Gear, Marie Claire, Fortune, al-Wasilah

(1) This file is in the name of Majd Suleiman and perhaps includes much information about his father Bahjat Suleiman, given that Majd is no more than a commercial façade for this father.
(2) According to a special report by Zaman al-Wasl: https://www.zamanalwsl.net/news/article/64038/

al-I'laniyyah, Concord Media for Road Advertisements, and the al-Balad newspaper in Lebanon and Kuwait, in addition to the al-Waseet advertising newspaper which was the backbone of the group. These publications gained a publishing license in a number of Arab and African states. Some were established and licensed in Europe and the United States. These successes led Majd Suleiman to become the Executive Director of the al-Waseet International Media Group AWA. The partnership between the two parties developed to include investment in the communications, banking, tourism, and real estate sectors.

In their foreign commercial businesses, Bashar Kiwan and Majd Suleiman were careful to communicate with the political leaderships of the countries in which they worked, and to employ their wealth far from popular scrutiny. They succeeded in establishing a partnership with the son of the former Jordanian prime minister, but the Jordanian secret police intervened to prevent this partnership, and also prevented the entry of Kiwan into Jordan.

At the same time, Kiwan and Suleiman were able to gain the right to publish the Saudi version of al-Hayat. This led Saudi Arabia into controversy following the publication of reports and news relating to Jewish sites in Saudi Arabia that attracted requests by Jews to visit Saudi Arabia. This led Kiwan and Majd to lose their publishing license, and led the former to be banned from entering Saudi Arabia.

Kiwan and Suleiman then moved into the business of acting as intermediaries and brokers between the French Rafael airplane company and Arab states interested in buying Rafael planes. They succeeded in concluding numerous deals and realizing high profits from them. Recent years have witnessed noteworthy activity on the part of Kiwan and Suleiman in Comoros, where

the state apparatus agreed – despite major opposition from parliament – to sell Comoros nationality to businesspersons who face challenges with mobility because of their nationalities. Kiwan and Suleiman's role is limited to mediation and brokerage between businesspersons and the Comoros government, but Kiwan played an active role in Comoros' presidential elections after successfully securing major revenues for the poor country from the sale of passports.

Majd Suleiman has used all of the media services that he owns to disseminate propaganda for the Syrian regime since March 2011. He also helped fund the Shabihah who participated directly in repressing the Syrian people. In turn, Syrians organized a campaign to boycott the United Group company and its publications.

In the middle of 2011, Yusef al-Nassar, the Kuwaiti former managing editor of al-Balad, reported Bashar Kiwan and his partner Majd Suleiman to Kuwaiti authorities for money laundering in Kuwait and other states in Africa and elsewhere, in addition to sex trafficking, drug trafficking, and spying for the Syrian regime in Kuwait. Nassar presented evidence suggesting that the al-Waseet media company and most of the media subsidiaries of the United Group for Publication are losing money, and quite a bit of it. One of these companies, based in Kuwait, loses as much as 25,000 Kuwaiti dinars per day.

These accusations influenced Kuwaiti public opinion. Bashar Kiwan and his partner Majd Suleiman were attacked on social media and in parliament, and were accused of spying on behalf

of the Syrian intelligence services. This led to the restriction of their commercial activities in Kuwait.(1)

Bahjat Suleiman is considered the main benefactor of his son Majd's activity in money laundering on behalf of the Syrian regime at the global level and through global partners. The directors of the office of Bahjat Suleiman and his retinue became millionaires using the millions of dollars that Bahjat gave to his children Majd and Haydarah under the eyes and supervision of the regime.(2)

(1) "Majd Sulayman is the 'boy' of the secret police, and the 'idiot' millionaire," *Iqtisad, Mal, wa A'mal al-Suriyyin*: https://www.eqtsad.net/news/article/16270/

(2) Haydarah Bahjat Sulayman works as director of publishing and executive director for the *Baladna News* media network, belonging to the United Group company.



Mazen Samir al-Tarazi

Place of Birth:
Sidnaya, 1962

Operates mainly in Kuwait and and runs a wide public relations campaign with politicians, media fellows, and ambassadors of some foreign countries for the benefit of the Syrian Regime.

Owns a national airline company, and runs many investment, real estates, news and advertising companies, through which he funds many Shbiha thugs.

Sanctions: Accused of money laundering in favor of the Syrian Regime and subject to US and European Unions sanctions.

Mazen al-Tarazi has spent more than 30 years of his life abroad in Kuwait, where he began his career as a regular employee in Kuwaiti newspapers like al-Ra'i al-'Am and al-Anba'. He then became an executive at the al-Waseet newspaper and moved from there to al-Siyasah. From there, he began to expand his commercial activity, becoming the head of the National Company for Airplanes in Syria, a founding partner in Syria's Group Four, Nama for Commerce and Contracting in Syria, Tanmiyya for Oil Services in Lebanon, the Dar al-Hadaf publisher in Lebanon, the al-Hadaf advertising newspaper in Lebanon, and the Marketing Group for Publicity, Advertising, Publishing, and Distribution in Kuwait, the al-Ghad and al-Waseet newspapers in Jordan, and the British General Commerce Company in Britain.

Tarazi holds British and Canadian nationality in addition to his Syrian nationality. Most of his commercial activity is focused in Kuwait, where he owns companies with a Kuwaiti officer. This permits him additional influence there. He also owns companies with the Kuwaiti businessman 'Abd al-Rahman Ma'ruf, and enjoys wide relations with certain politicians, media figures, and foreign diplomats in Kuwait. But at the same time, he enjoys close connections to the leaders of the Syrian regime. He provided 500 computers to the Syrian premiership in 2002 to support what he called the "march of development and modernization led by the leader, Bashar al-Assad."

In 2014, Mazen al-Tarazi became more prominent on the Syrian scene. He dedicated two private aircraft to transporting Syrians interested in voting for Bashar al-Assad in that year's elections.

He emerged again in the same year to publish a video of himself in front of the White House attacking former president Barack Obama and U.S. policy in general. In this video, he held the U.S. administration responsible for killing children around the world, as he praised his leader, Bashar al-Assad.

In 2015, Tarazi launched a campaign under the slogan "We're returning, Syria." This campaign provided the travel expenses for the return of any young people abroad anywhere in the world to Syria. It did so to show that Syrians are returning from the diaspora to Syria, and to raise the profile of the Syrian regime abroad.

In March of the same year, Tarazi bought the Seidnaya hotel and spa in a deal worth 11 million euros. He worked to encourage Christian religious tourism to the city, given its proximity to Ma'lula, which includes historical Christian churches and places of worship. The hotel consists of around 100 rooms and

15 wings. Tarazi is attempting to raise the level of the hotel to seven stars, and to provision it with a modern means of transportation.

In the same year, Tarazi established the National Airline Company in Syria, the third private airline company in Syria after the Rami Makhluf's Cham Wings and Samer Foz's Fly Aman. The company was established in Seidnaya in the Damascus countryside, with capital valued at 70 million Syrian pounds. Mazen al-Tarazi has an 85% share in the company. The rest of the shares belong to his sons, Khaled and Ali al-Tarazi.

Mazen al-Tarazi has been able to obtain the necessary license for an airline company in his very short time in Syria through his close relationship with the Assad family. He used his network of foreign relationships to sign an agreement with the French Airbus company to buy four A321 planes at a value of 440 million euros. But because he was put on the U.S. sanctions list in 2015, he has not yet received these planes due to pressures applied by the U.S. State Department on France. His assets and properties in the United States were frozen as a result of his exploitation of his commercial activities on behalf of the Syrian regime.

Lebanese media have given Mazen al-Tarazi in 2014 the nickname, "the Syrian crook Mazen al-Tarazi," following his arrest by the Lebanese judiciary for appearing in an embezzlement and fraud case against Lebanese businessman Reda al-Masri. Tarazi rejected this nickname, and began to slander the Lebanese judiciary and Reda al-Masri in the Kuwaiti newspaper al-Siyasah.

Tarazi purchased the house of Saad Hariri, who had inherited it from his father Rafiq al-Hariri in the al-Maliki neighborhood in Damascus. Tarazi did so after regime authorities appropriated it in 2016 because of Hariri's support for the Syrian people.

Despite the scandals that have pursued him in numerous countries, Tarazi has continued his business activity. He joined Samer Foz in his Marota City project in the region of Basatin al-Razi near the al-Mezzeh neighborhood, which depends upon Legislative Decree No. 6 of 2012 issued by Bashar al-Assad. He began to work on this project in 2017, when an agreement was signed with the Damascus General Holding Company to establish a commercial complex at a value of 108 billion Syrian pounds, as well as six other buildings in the same project. Tarazi's share in the project is 51%, while the public share is 49%. This is the first time that the investor's share would be larger than the government share.

In addition to his business activities on behalf of the regime, Tarazi provided material support to regime fighters, and the families of fighters who had been killed in combat. He did so by establishing the Basmat Amal project in 2017, which he still runs.

On 21 January 2019, Mazen al-Tarazi was placed on the European sanctions list. The European Union published on its official website a notice that said, "The leaders of the European Union met today in Brussels and agreed to widen the list of sanctions against the Syrian regime, in addition to new names of 11 Syrian businesspersons and five entities." At the head of this list were Mazen al-Tarazi, Samer Foz, Hussam Qaterji, Khaled al-Zubaydi, and Nader Qala'i.[1]

(1) Tarazi's is listed as number 266 on the European sanctions list.

On 19 March 2019, the Kuwaiti state security service arrested Mazen al-Tarazi with a number of his assistants in a raid on Tarazi's al-Hadaf newspaper building in Kuwait. Tarazi was accused of money laundering on behalf of foreign parties, spying with foreign parties, and printing publications without a license. His collaborators were also accused of belonging to Lebanese Hezbollah and spying on its behalf. Kuwaiti authorities seized computers, cameras, and phones belonging to Tarazi and his assistants.

Despite Tarazi's denial of the charges against him, Kuwaiti security extracted information from his electronic devices and documents that they found in his office. This data suggests his involvement in the activities which he was accused of committing, and proves that he is in communication with regime cronies.

After the passage of four days from his arrest, Tarazi was released for unknown reasons without any accusation being leveled against him or his assistants. Some sources have indicated that he was arrested for political reasons following the Syrian Ministry of Finance's freezing of the funds of Kuwaiti investors.



Mazen al-Tarazi observing activities by Syrian Arab Army soldiers



Muhammad Bashar Kiwan

Place of Birth:
Kuwait 1967

considered a key figure in Assad's network for money laundering and evasion of international sanctions.

Occupation: Partner 'Sports Motors' Company, 'Al-Waseet' International AWI Company and founder of 'United Group for Advertising and Publishing' company through which he works with Majid Suleiman and 'Dagher & Kiwan' group for the benefit of the regime.

Engagements: Accuesed of running money laundering network, for which he was arrested in Dubai and for 5 years imprisonment by a Kuwaiti court.

Muhammad Bashar bin Muhammad Bashir Kiwan was born in Kuwait City in 1967. He received a Master's degree in Economics from the University of Montpellier in France. He married a French woman and received French citizenship.

Kiwan has a number of companies active in the fields of publicity and advertising. He benefits from his close relationship with Majd Suleiman, son of Major General Bahjat Suleiman. He acts as an arm of the Assad family network, helping it launder money and evade sanctions.

Bashar Kiwan is a founding partner in the following companies: Dagher and Kiwan for General Commerce, Mathematical Engines, Waseet International, and United Group (UG), alongside Majd Bahjat Suleiman. He is also the manager of

AWE Holding in the Dubai Global Financial Center in the United Arab Emirates.

In 1992, Bashar Kiwan established the newspaper al-Waseet al-Mubawwabah in Kuwait, which was his springboard toward the world of business. The newspaper evolved from a weekly Kuwaiti classifieds publication to a widely circulated newspaper in Jordan, the Emirates, Bahrain, Qatar, Oman, Lebanon, and Egypt. Versions of it were published under the name al-Waseet in Saudi Arabia and Syria.

The partnership between Kiwan and Majd Bahjat Suleiman quickly developed in the world of commercial media through the establishment of the United Group for Advertising and Publishing, which published a number of technical and advertising newspapers and magazines in Syria, and in a number of Arab states, including Layalina, Baladna, Top Gear, Marie Claire, Fortune, al-Wasilah al-I'laniyyah, Concord Media for Road Advertisements, and the al-Balad newspaper in Lebanon and Kuwait, in addition to the al-Waseet advertising newspaper, which was the backbone of the group.

All of these newspapers have a license for publication in numerous Arab and African states. Majd Suleiman aspires to enter the U.S. and European markets as executive director of the AWA Group. There is also a partnership between Kiwan and Suleiman in the fields of communications, banking, tourism, and real estate.

Sources indicate that Kiwan and Suleiman exploit their political influence to establish wide relationships with the political leaderships of many states. They are closely linked to the son of the former prime minister of Jordan. They attempted to establish a partnership with him, but the Jordanian secret police intervened and prevented this. Still, they succeeded in

exploiting their relationships to secure the right to publish the Saudi version of the newspaper al-Hayat for a short period. The publication license was then revoked from Kiwan and Suleiman because of their publication of reports and news that encouraged tourism to Jewish archaeological sites in Saudi Arabia.

Informed sources accused Bashar Kiwan and Majd Suleiman of fraudulently attempting to transfer Concord to their friend businessman Fuad Jabri, following the issuance of a number of juridical rulings canceling the transfer because it lacked sound legal justifications. This did not prevent Kiwan and Suleiman from taking the profits of the company, which led Fuad Jabri to state to the 'Aks al-Sayr website that the Kiwan and Suleiman "Deal with my rights and funds as if there are no consequences. They engaged in unilateral activities without my knowledge and without my agreement. They involved the activities of Concord and its profits in the activities of the United Group closed corporation, to which I have no direct or indirect connection."

In the middle of 2011, Yusef al-Nassar, the Kuwaiti former managing editor of al-Balad, reported Bashar Kiwan and Majd Suleiman to Kuwaiti authorities for money laundering in Kuwait, as well as other states in Africa and elsewhere, in addition to sex trafficking, drug trafficking, and spying for the Syrian regime in Kuwait. Nassar presented evidence confirming that the al-Waseet media company – and most of the media companies belonging to the United Group for Publication – are losing quite a bit of money. One of these companies in Kuwait loses around 25,000 Kuwaiti dinars per day. But its costs are covered by unknown sources, and its books report that it remains profitable.

These accusations influenced Kuwaiti public opinion. Bashar Kiwan and his partner Majd Suleiman were attacked on social media and in parliament, and were accused of spying on behalf of the Syrian intelligence services. This led to the restriction of their commercial activities in Kuwait.(1)

Bashar Kiwan and Majd Suleiman manage wide-ranging commercial activities in Comoros. They gained the agreement of the Comoros state despite major opposition from the Comoros parliament to sell Comoros nationality to businesspersons who have difficulty with mobility due to their nationalities. The role of Kiwan and Suleiman is limited to mediation and brokerage between businesspersons and the Comorian government. They also intervened in the presidential elections to support former president 'Abd Allah Sami in 2011, but he lost the elections, impeding the "economic nationality" project that Kiwan pursued on behalf of the former president to raise the income of the country. The Bidoon of Kuwait (stateless) and the Emirates gained Comoros nationality in exchange for a sum of money, which resolved a crisis that constituted a recurring headache for the Emirati state. The British Guardian newspaper confirmed that the Emirati state agreed to pay $200 million to Comoros in exchange for their agreement to grant nationality to around 4,000 Bidoon. Despite the refusal of the parliament for the project, an alternative law was signed that opened the door for companies to play the role of intermediary to provide the those countries' nationality in exchange for 60,000 USD.(2)

Then Bashar Kiwan and Majd Suleiman moved to the mediation and brokerage business, brokering between the French Rafael

---

(1) "Majd Sulayman is the 'boy' of the secret police, and the 'idiot' millionaire," *Iqtisad, Mal, wa A'mal al-Suriyyin*: https://www.eqtsad.net/news/article/16270/

(2) *Al-Khalij al-Jadid*, "Behind closed doors, stopping the Syrian Kiwan, engineer of the deal of the *bidun* of the Emirates," http://tiny.cc/v01o6y

airplane company and Arab states interested in buying their planes. They succeeded in concluding numerous deals and realizing high profits from them. Because of Bashar Kiwan's involvement in a number of cases of embezzlement and fraud, the Kuwaiti criminal court under the presidency of 'Abdallah al-'Uthman issued a decision in 2017 to raise a case against Bashar Kiwan and an employee of his named Tariq al-Hadidi for five years, holding them with work and leave. Kiwan was also accused of embezzling 33 million dinars from the Kuwaiti public treasury.

Despite those accusations and judicial rulings issued against him, Kiwan was able to flee Kuwait on 27 December 2017. An Egyptian truck driver smuggled him through the Kuwaiti al-'Abdali crossing to the city of Basra in Iraq, in exchange for a large sum of money. He continued his travel, using his French passport to get to Beirut before finally arriving in the Emirates. Kuwaiti authorities were able to arrest the Egyptian driver and a number of other individuals, charging them with assisting Bashar Kiwan himself to flee the country; among the arrested people was Kiwan's brother. Kiwan, however, was arrested on 15 January 2018 in Dubai based on a warrant issued to implement the judicial ruling issued against him. He was then extradited to Kuwaiti authorities.



Bashar Kiwan with Majd Bahjat Suleiman



Salim Dib Da'bul

Place of birth:
Dayr 'Attiyah 1959

Son of the former President Hafiz Al-Asad personal Secretary for 40 years. Maintains close relationship with Bashar al-Assad and works in the Qalamoun region under the guidance of the regime.

Owns 25 major companies, in addition to the private University of Qlamoun, and a partner in, any other companies such as Alnibras, Dhura, Al Diyafa, and Snir.

Engagements: subsidized a gang of Shabiha (armed thugs) in Qalamoun, who took part in raiding, bombing, and committing massacres in the twon of Qara, Yabrud, Grieger and Al-Tal.

Salim bin Muhammad Dib Da'bul was born in Dayr 'Attiyah in the Damascus countryside in 1959. Following his graduation from the Architecture College at the University of Damascus in 1984, he enrolled a Czechoslovakian university to continue his study in Architecture. He returned to Syria carrying Czech nationality, and received a doctorate in Architecture in the Department of Planning and Environment in 2011.

Salim Da'bul owns more than 25 companies, including large companies and their subsidiaries. He is CEO of al-Nibras, partner and member of the board of trustees at al-Qalamun Private University, founding partner of Dhurra closed holding corporation, founding partner and board member of Diyafah, owner of Snir JSC, and president of the Syrian-Czech Chamber of Commerce.



Sources indicate that Salim Da'bul works in the Qalamoun region under the direction of the regime. Salim Da'bul enjoys a close relationship with Bashar al-Assad; he is the son of the former manager of the office of the presidency, Muhammad Da'bul (known as "Abu Salim Da'bul") who served in this position for 40 years. Muhammad Dib Da'bul secured agreements for projects that he received from state agencies in the interest of major merchants, and took a cut of the profits of the project or financial sums in exchange for these services. He also joined those merchants' companies, as in his partnership with Hassan al-Hajjar, a major textile exporter in Syria.

Salim Da'bul followed in his father's footsteps. He established new projects that served the interests of the regime, especially in the field of private universities. He convinced Bashar al-Assad to allow the granting of licenses to open private universities in Syria, gaining a license for his "al-Qalamoun Private University" project. He started this project with funding from Bashar al-Assad and a group of wealthy individuals from the ruling class, including Rami Makhluf.

Upon the outbreak of peaceful protests in March 2011, al-Qalamoun Private University witnessed a number of demonstrations. In response, Salim Da'bul brought in security forces to suppress and arrest demonstrators and throw them in prison, to dismiss some of them, and to put pressure on students to ensure their loyalty to the regime, or at least their silence or neutrality.

Salim Da'bul is also accused of supporting and funding Shabihah and mercenaries in al-Qalamoun in order to suppress demonstrations in the region. He became a main source for funding for the Shabihah in al-Qalamoun, who terrorized the populations of Qarah, Yabrud, Jrajir, and al-Tal, and cooperated with security and army forces in bombarding, storming, and committing massacres in these towns.

Da'bul also opened all of his facilities in al-Qalamoun to Shabihah and security forces, and supported them in investigating and eliminating any individual accused of smuggling weapons from Lebanon to the Free Syrian Army. He leaked information that led to the arrest or elimination of numerous youths in the city of Homs – most of them university students – with various accusations including activism against the regime in demonstrations or spying for foreign entities such as satellite channels.



In 2012, Salim Da'bul was kidnapped for 22 days in 2012. He was released in unclear conditions that suggest that a pro-regime militia was involved.

In March 2018, Salim Da'bul put forward the idea of establishing a new province that would encompass al-Nabak, Dayr 'Attiyah, Qarah, and Yabrud. He worked to secure a Republican Decree to achieve this end, which aimed to form a holding company in Syria to reconstruct the region following the expulsion of its population. This company includes Abu Salim Da'bul, Dhu al-Himma Shalish, the office manager of Maher al-Assad, and Muhammad Hamsho. It aims to supervise and broker of all reconstruction activities.



George Haswani

Place of Birth:
Yabrud – Rif Damascus

Close associate to president Bashar al-Assad's business circle. Played a major role in serving as a middleman for oil and gas purchases by the Syrian regime from ISIL.

Owns "HESCO" an Engineering and Construction Company, which is considered the Syrian major partner of the Russian "Stroytransgaz" company.

Engagements: Accused of funding militias affiliated to the Syrian regime such as the "Qalamoun Shield Forces", which committed a huge number of crimes against the Syrian people.

Sanctions: US Traesury imposed sanctions againt his company in Russia, along with other companies and banks afflilated to him in Russia and Cyprus.

George Haswani was born in the city of Yabrud. He studied in the Soviet Union in the Polytechnic Institute, where he received a doctorate in 1979 through a scholarship provided by the Syrian Ministry of Higher Education. Following his graduation, he worked as a professor in the College of Mechanical and Electrical Engineering. He was then appointed to a short stint as manager of the Banias refinery.

At the beginning of the 1990s, Haswani began to establish a number of companies including Haswani Bros., which participating in the operations of three Russian facilities, two of which were for sewing clothes, and the third for manufacturing bicycles. Georges Haswani holds Russian as well as Syrian nationality.

Haswani then established the Hesco Engineering and Construction Company, through which he forcefully entered the world of business. He implemented a number of projects with Syrian government companies that work in the field of oil and gas. He also implemented projects for the Ministry of Energy, the Ministry of Oil and Mineral Resources, the Ministry of Industry, and the Ministry of Defense.

The Hesco company is considered a subsidiary of the Russian Stroytransgaz company, which signed an agreement with the Syrian Gas Company to build a gas treatment plant, and to prepare gas fields in the Twaynan field near Raqqa, and Hesco's work with Stroytransgaz to other countries including Sudan, Algeria, Iraq, and the UAE. The Russian billionaire Gennady Timchenko owns this company, and is closely tied to the Russian president Vladimir Putin. This enabled Haswani to establish close connections to high economic and political circles in Russia. He had the most important role in convincing the Russian company to continue its projects following the imposition of Western sanctions decision against foreign companies operating in Syria because of the Syrian regime's crimes against the Syrian people.

Following ISIS' conquest of wide swathes of Syrian territory rich in gas and oil, including the Twaynan gas project located between Raqqah and Palmyra, George Haswani made an agreement with ISIS to split the revenues from Twaynan, and gave a guarantee to an agreement that charges ISIS with protecting the project's employees in exchange for a deal to share the project's products, which fed the Aleppo thermal power station, between the organization and the Syrian regime. The government received 50 megawatts of electricity, and ISIS received 70 megawatts, in addition to 300 barrels of oil

products. Hesco agreed to pay 50,000 USD to ISIS in exchange for their protection of the project and its facilities. At the same time, the company received 120 million euros from the Ministry of Petroleum as compensation for the equipment, machinery, and facilities that were "looted and destroyed," paid by the ministry per an insurance clause in the contract signed by the two parties after the Twaynan gas project fell out of regime control at the beginning of 2013.

In May 2015, U.S. special forces launched an operation inside Syrian territory that resulted in the death of Abu Sayyaf, the financial officer managing the sale of oil for ISIS. The operation recoveredthousands of documents in Abu Sayyaf's headquarters in Deir Ez-Zor. This made it the largest reconnaissance operation in the history of U.S. special forces, given the huge amount of ISIS documents that the raid uncovered.

In November 2015, a small meeting was held by the core group fighting ISIS in Brussels. In this meeting, the delegate of U.S. president Barack Obama to the international coalition against ISIS, Brett McGurk, confirmed that the organization received larger revenues than the coalition had previously believed. The documents revealed the scale of the cooperation between the regime and ISIS. The two parties engaged in mutually beneficial arrangements despite the claim of each that the goal of the war was the destruction of the other. Based on analysis of these documents, the U.S. Treasury Department took the initiative on 25 November 2015 to impose sanctions on George Haswani and his Russia-based company, in addition to organizations and banks in Russia and Cyprus.

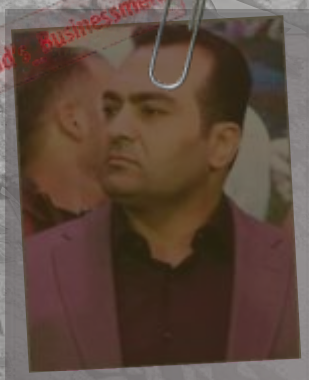
According to a document that was published in 2016 (No. 156 of 11 February 2015), ISIS' diwan bayt al-mal (Ministry of Treasury) asked the office of Abu Sayyaf to establish



investment relationships with businesspersons in communication with the regime, confirming the existence of previous de facto agreements between the two parties that allow the passage of trucks and pipelines from areas under regime control to areas under ISIS control without exposure. Other documents confirmed that ISIS had paid additional salaries to government employees loyal to the regime.

It is noted that George Haswani represented the regime during the operation to release the nuns who had been kidnapped by Jabhat al-Nusra fighters from a Ma'lula monastery. Haswani had also been kidnapped for a short time in the city of Yabrud, which the regime bombarded heavily until he was released.

It is worth noting that George Haswani is a crony of Bashar al-Assad. He played an essential role in helping the regime in provide large amounts of gas and oil through intermediaries to terrorist organizations. Kaswani also undertook the task of funding regime militias including the "Qalamun Shield Forces," which committed a many crimes against the Syrian people. Although he has been documented as being involved in huge violations, European sanctions were lifted from Haswani in April 2017.



Khider Ali Taher

Place of Birth:
Safita – Tartous 1976

One of the Brigadier Ghassan Bilal's henchmen, head of Maher Al-Assad's office. Accused of managing a netwok of thugs collecting illegal tributes at checkpoints and crossings in Regime's dominated districts.

His commercial activities include tourism, hotel management and telecommunications, through Al-Yasmeen Contracting, Ella Tourism, Emma Tel for telecommunications and other companies.

Engagements: Funds an estimated number of 2000 mercenaries "shabiha" affiliated to the 4th Division miltias, who were involved in large-scale repression against the Syrian people.

Khider Ali Taher (born in Safita in the Governorate of Tartous in 1976) is an obscure figure serving the regime through commercial companies. He is an associate of Brigadier General Ghassan Bilal, office manager for Maher al-Assad. Khider Taher led militias linked to Maher al-Assad's Fourth Division. He was chosen to direct the collection of fees at checkpoints and internal crossings between regime and opposition areas, as well as crossings with Lebanon. He also traded in oil and gas energy resources.

In 2017, official circles in the state began to register companies owned by Taher. These companies included contracting, tourism and hospitality, and communications companies. Taher controls a number of companies: He is a founding partner in Yasmin for Contracting, manager and owner of Iyla for Tourism, and manager and owner of Imatel for Communications, which

owns three subsidiaries in Jableh, Lattakia, and Damascus. This company is exclusively involved in importing cell phones and electronics from Iran and distributing them on the Syrian market. Taher is also CEO and founding partner of the Syrian Company for Hotel Administration, and the owner of al-Qala'a for Protection, Guarding, and Security Services, managed by Muhammad Dirki. All of these companies were established in 2017, and constitute a means of obscuring and laundering money collected illicitly at crossings and through looting.

Sources indicate that Khider received support from Iran as a result of his close relationship with Maher al-Assad. Members of his militias have received Iranian training and logistical support, as well as combat training from Lebanese Hezbollah. These militias controlled crossings in Hama and its countryside before being displaced by the Russian-backed Fifth Corps.

Information published by MENA Monitor suggests that "The crossings with opposition areas have secured huge sums for regime officials; for example, in 2017 the crossings with Daraa, al-Quneitra, Rif Dimashq, Homs, Aleppo, Hama, al-Raqqa, Deir Ez-Zor, and others made 1.4 billion USD, most of which went to Maher al-Assad."

On 20 February 2019, the regime's interior minister, Major General Muhammad Rahmun, signed a memo forbidding the Ministry and police units from dealing with Khider Taher. But the memo remained in effect for only 20 days, and Rahmun signed a second decree on 10 March 2019 canceling the first one. This demonstrated Khider Taher's power over regime leaders and networks of corruption linked directly to the Republican palace.

Khider commands an estimated at 2,000 militia fighters. They carry security IDs, and fund reconciliation agreements as well as the “We’ll stay together” program for small projects that aim to support the families of regime fighters killed and injured in combat. This program supports 500 families who lost their sons fighting on behalf of Bashar al-Assad.



تعميم



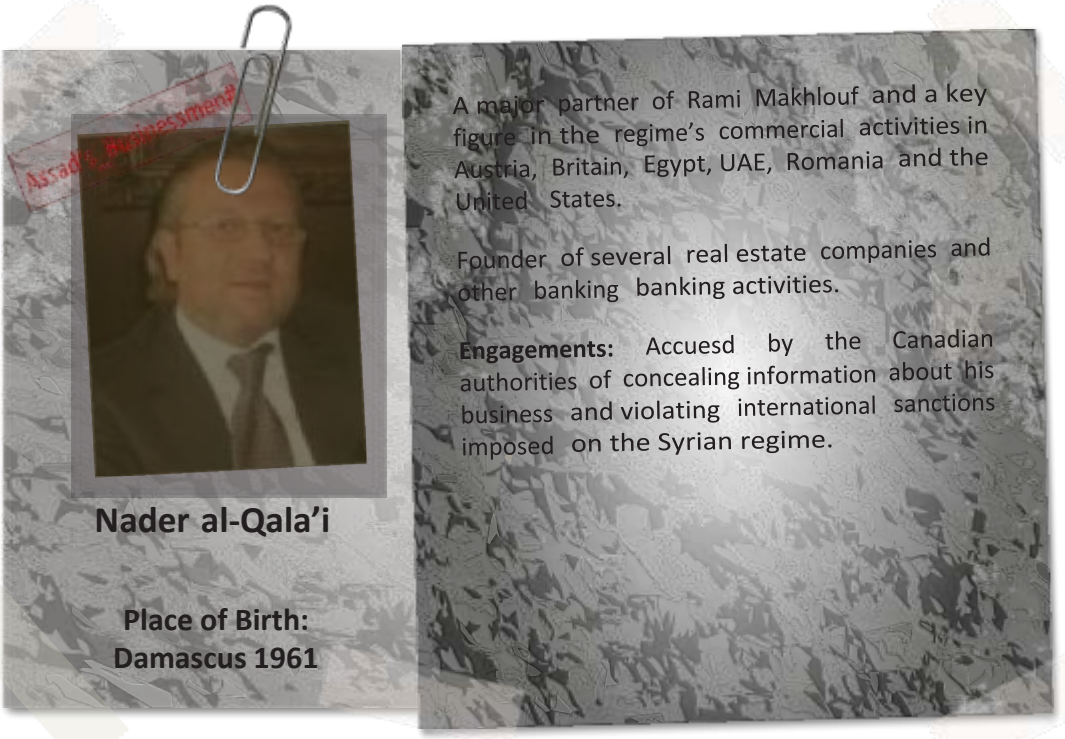
تعميم

اللواء محمد الرحيمي

وزير الداخلية



Khider Taher with Minister of Tourism Bisher Yazigi.



Syrian businessman Nader al-Qala'i was born in Damascus in 1961 to a well-off family. He graduated from the Commercial Community College in Damascus. He continued his studies in the United Kingdom, then worked in management in companies belonging to his father, Muhammad al-Qala'i, that were involved in real estate and the importation and sale of automobiles. He suffered major losses in 1984.

During his studies in Damascus, Nader al-Qala'i became acquainted with Basil al-Assad through an equestrian club. They became close friends and frequently visited one another until Nader departed for the United Kingdom to complete his studies. In the United Kingdom, Nader played a major role in selling paintings and artifacts for Basil al-Assad and Nader's brother Hisham, who resided in Canada and was accused of

selling Syrian artifacts by Canadian customs officials. Nader then left for Paris, where he opened a restaurant.

Upon Basil's death, Nader lost much of his influence. This led him to grow closer to Bashar al-Assad's cronies, especially Brigadier General Hafez Makhluf, who helped him borrow large amounts of money via the manager of the Syrian Real Estate Bank, Muhammad Makhluf, father of Rami and Hafez. Since then, Nader has worked as a façade for the business of Rami and his father. This is especially the case with regards to Nader's companies' involvement in the production and sale of oil to European states in arrangements that include large commissions that go primarily to the Makhluf and Assad families.

As his relationships with influential figures in the ruling elite evolved, Nader al-Qala'i was tasked with recovering the money of Basil al-Assad, estimated at around 4 billion USD. Basil was posthumously married to one of Nader's relatives to enable the transfer of his wealth to Syria. A portion of this money was given up to Swiss banks.

The relationship between Nader al-Qala'i and Rami Makhluf developed after this deal, and the two men became partners in embezzlement and fraud. Nader al-Qala'i and Iyhab Makhluf, Rami's brother, were appointed as legal guardians by the Syrian judiciary in the Syriatel communications company case raised by the Egyptian businessman Nagib Sawiris against Rami Makhluf. This led to the appointment of Nader al-Qala'i to the position of CEO of Syriatel. His influence subsequently expanded in the field of banking through his role as director of Bank Byblos Syria.

Nader continued to engage in corruption on behalf of the Makhluf family during his new tenure. In 2005, Rami Makhluf

and Nader al-Qala'i traveled to China to sign a commercial agreement with the Huawei cellular communications company. They requested a 20% commission for this deal, surprising the Huawei board because it is unusual for the owner of a company like Syriatel (i.e., Rami Makhluf) to request a personal commission. This strengthened suspicions that the company's de facto owner is Bashar al-Assad.

In 2008, the relationship between Rami Makhluf and Nader al-Qala'i deteriorated, leading to Qala'i's removal from shared investments with Rami, especially in Cham Holding, Syriatel, and Mashriq for Real Estate Investment. Nader, his children, and his wife left for Canada, where he established Telefocus Consultants Inc. in the city of Halifax. At the time, Qala'i accused Makhluf of stealing one billion Syrian pounds from him.

With the outbreak of the Syrian revolution, and the imposition of economic sanctions on the Syrian government and businesspersons connected to the Syrian regime by the United States, the European Union, and other states, the door was opened for Nader al-Qala'i to return and help the regime evade sanctions. Nader acted as a commercial intermediary for the regime outside of Syria through three companies in Lebanon, where he was able to open funds and transfer contracts. He also extended his commercial activities in aid of the regime in Austria, the United Kingdom, Egypt, the UAE, and Romania, as well as the United States via Basil al-Qala'i, who resides in New York.

The relationship between Nader al-Qala'i and Rami Makhluf was quickly restored after 2011. Information suggests that they are partners in 45 companies, and work through their wives' families to evade sanctions. Rami Makhluf's wife is Razan 'Uthman and Nader al-Qala'i's wife is Maryam Hajj Hussayn.

They are active in commerce, and act as facades for their husbands. Qala'i's brother-in-law manages the Talisman hotel in Damascus and the Syrian Yacht Club.

In 2013, the Romanian government froze the assets of Rami Makhluf. But it failed to freeze the assets of his father-in-law Walid 'Uthman, the Syrian diplomat to Romania; his two sons ,Ali and Qusurah (who are business partners of Nader al-Qala'i); or companies belonging to Rami Makhluf, Nader al-Qala'i, and Haytham al-As'ad.

The regime has depended upon Nader to manage companies in Damascus, Vienna, Beirut, and Brussels, where Qala'i has established three companies specializing in real estate (Domicilum Ltd, Pendulum LLC, and Treasure Properties LLC) with Walid 'Uthman's sons. Ali, Walid's youngest son, purchased a commercial consortium with Haytham al-As'ad in Baku. Qusuwah 'Uthman and Nader al-Qala'i control a number of companies in Vienna, the most important of which are Treasure Properties GmbH and Medox Group, which manages Rami Makhluf's real estate investments in Dubai.

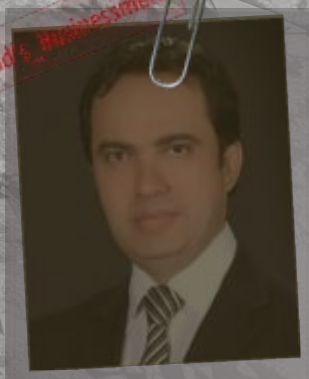
In March 2017, Nader al-Qala'i established a real estate development company with a capital valuation of 50 billion Syrian pounds in an attempt to fill the large void in the investment market following the flight of capital outside of Syria. This company is one of the avenues through which Bashar al-Assad distributes roles between his cronies to give them wide authorities to act on behalf of the government, and to manage all of the major real estate assets owned by Syrian governorates and towns that have faced destruction. Nader also funds reconstruction through this company.

Nader al-Qala'i's activities have been under investigation by Canadian authorities since 2016 because he is accused of hiding information related to his commercial activities, his material income, his relationship with the Syrian regime, and his violation of Canadian sanctions imposed upon the Syrian government. He was also discovered to have paid a sum of 140,000 USD to the Syrialink company.





Nader al-Qala'i's Home in Canada



'Adel Anwar al-'Ulabi

Place of Birth:
Damascus 1976

Governor of Damascus municipality and Chairman of Damascus Cham Holding Company (DCHC). Partner with Rami Makhlouf, Samer Foz businesses and other businessmen affiliated to the Syrian regime.

Engagements: Provided a forefront for Bashar Al-Assad's volations in his urban development projects, in re-planning neighborhoods of the capital, Damascus, taking over the assets of thousands of displaced Syrians.

'Adel Anwar al-'Ulabi was born in the city of Damascus in 1976. He received his Baccalaureate degree in Mechanical Engineering, then received a professional Master's degree in Economic and Social Planning. He was appointed as a member of the council of the Governorate of Damascus, then as a representative the governorate and president of the council of the governorate in 2012. He was also manager of printing for the al-Baath newspaper. He is a member of the central conference for the syndicate of engineers. He is considered a prominent and young member of the ruling Baath party because of his connection to the network of Rami Makhluf, Samer Foz, and other regime crony financiers

'Adel al-'Ulabi became CEO of Damascus Cham Holding Company following his assumption of the position of Governor of Damascus on 26 November 2018, and time spent on the

company's board. This indicates the significance of Bashar al-Assad's appointment of 'Adel al-'Ulabi as governor of Damascus, since Damascus Cham Holding and its subsidiaries are responsible for the Marota City project. Bashar al-Assad announced this project via Legislative Decree No. 66 of 2012 and its amendments. This project encompasses the southeastern area of al-Mezzeh in Damascus in Basatin al-Sabsar (cactus orchards), the area behind the Iranian embassy, the area behind al-Razi Clinic and al-Lawan in Kafr Susah. Along similar lines, the Basilia City project includes Darayya, al-Qadam, 'Asali, Yarmuk camp. Generally speaking, these areas were sites of popular mobilization against the Assad regime. The regime has therefore targeted the inhabitants of these neighborhoods by inaugurating projects aiming to force them from their homes, neighborhoods, and even their cities. Bashar al-Assad, alongside cronies such as 'Adel al-'Ulabi and other businesspersons such as Rami Makhluf, Samer Foz, and Mazen al-Tarazi are attempting to destroy these areas of Damascus, rebuild them, and settle a class of regime loyalists in them.

This same process is apparent in the garden of "Umm Hussayn," established by Hafez al-Assad in the city of Hama on the ruins of the old cemetery in which the remains of those who had been killed in the Hama massacre of 1982 had been buried. Bashar al-Assad has precisely the same goal with the Marota City and Basilia City projects, and with Law No. 10, which threatens the property of hundreds of thousands of Syrians.

'Adel al-'Ulabi acts as Bashar al-Assad's legal instrument, acting as a façade for construction efforts to re-plan the neighborhoods of Damascus in a way that fits the vision of the security and military apparatuses, which aim to create areas that are designed architecturally to allow heavy military equipment

like tanks and troop carriers to circulate with total freedom, no matter how much opposition exists there.

It is noteworthy that in its third clause, Legislative Decree No. 19 of 2015, which governs the establishment of Syrian closed private holding companies in Syria, exempted “properties transferred to the holding company, or from the holding company to its subsidiaries, or to [companies] participating in it, from all taxes and fees of whatever description.”







Bisher Mazen al-Sabban

Place of Birth:
Damascus, 1966

Enjoys good relation with Makhlouf family, which, in spite of his diffusion of corrupt behaviors; gave him the green light to hang to his post as governor of Damascus for 12 years (2006-2018).

Engagements: Transformed many of Damascus Governorate buildings into a military barracks and employed 5,000 workers from the governorate staff to work with the security forces and mercenarie (shabiha) in suppressing the demonstrations.

Sanctions: Included in the European snactions list in 2016 for participating in the violent repression against Syrian civilians, and implementing discriminatory practices against Sunnis in Damascus.

Bisher Mazen al-Sabban was born in Damascus in 1966. He received a degree in Dentistry from the University of Damascus, then became a member of the council of the Governorate of Damascus from 1999 to 2002. He was vice president of the governorate council during the same period. He also became a leader of the branch of Arab Socialist Baath Party muhajirun from 1992 to 1993. In 2006, he was appointed governor of Damascus. He continued in this position until the end of 2018.

During his time as governor, Bisher al-Sabban engaged in unfair dealings against the Syrian people. In 2007, he issued orders to remove the population of al-Tariq al-Thani in Kafr Susah in Damascus in order to expropriate their property on behalf of the Foreign Ministry. This led to the expulsion of 200 families who had lived in this area for decades. Popular opposition and minor demonstrations did not change the outcome of this

process, and the governor called upon the police and secret police to suppress them. The inhabitants of this area were forced out with the implementation of the expulsion order, and were moved to a project in the al-Hussayniyyah area south of Damascus. They were not given alternative housing until after seven years later, when they were compensated with small apartments in the Qadasiyya suburb, after paying sums to a crony of Bisher al-Sabban, ‘Abd al-Fattah Iyaso, who at the time was the governorate’s zoning director.

Amidst these violations against the inhabitants of Kafr Susah, Sabban began to implement the King Faysal Street project. A large number of archaeological sites were torn down in Damascus for this project, including mosques and an ancient market on the global heritage list.

Sabban continued to implement his plans despite the objection of certain members of parliament. He issued a decision to take ownership of the al-Hamrawi Mosque, which included archaeological sites and ancient houses. All of this took place through a policy of demolishing archaeological sites.

Thousands of Damascenes continued to complain about Sabban’s policies. In 2010, Sabban issued a decision in 2010 to demolish the Abu Jarash neighborhood in the al-‘Adawi area of Damascus. The houses of this area were prepared for demolition under the pretext that they were in violation, and that the governorate wanted to convert the area into a public park.

After the outbreak of peaceful protests in 2011, Bisher al-Sabban took the initiative to assist the regime in suppressing citizens. The Governorate of Damascus building was converted to a headquarters for the suppression of Friday protests. 5,000

workers from the parks, cleaning, and maintenance directorates were employed to help suppress demonstrations and help security men and shabihah engage in violations against civilians. An operations room was then formed in the basement of the governorate building, which had previously been prepared to deal with natural disasters. Sabban headed security groups supported by a private communications network prepared in this basement with the aid of Iranian experts.

Sabban gathered governorate employees on Fridays in Basil al-Assad Hall in the governorate building, and instructed them to suppress the protests. General Secretary of the Governorate of Damascus Khaled al-Shamma', Director of Sanitation Engineer Walid Jiha, Director of Maintenance 'Adel al-Azhar, and the garage manager, in cooperation with the governor, sent workers to protest sites and gave orders to hit protestors and cause permanent disabilities, and to destroy public amenities and blame protestors for these acts of vandalism. Shaykh Sariyah al-Rifa'i discussed this subject in a sermon on Friday, 5 August 2011.

Confronting the objections of governorate employees, Bisher al-Sabban informed the security services on the opposition, submitted them to investigation, and issued decisions to prevent them from returning to work despite the issuance of judicial rulings stipulating that they be able to return to work after being fired.

Sabban also signed contracts with the Military Construction and Housing Institutes to implement projects at inflated cost, such as the maintenance contract for irrigated lawns in the Governorate of Damascus, which reached a cost of tens of millions of pounds in a single location. Such maintenance work

is typically the task of the Parks Directorate, and the profit from these expenses went to fund suppression.

Sabban also charged a Shi'i member of the executive office, 'Adnan al-Hakim, with coordinating with Lebanese Hezbollah fighters to implement private investment projects in the city of Damascus. The goal of these projects was to destroy Sunni religious sites and establish alternative projects on sectarian bases to serve Iranian expansionism in the city of Damascus.

In the same period, Sabban advised an agreement for the project of Decision No. 774, which stipulates the establishment of two districts, a green area, and a green belt. This project gives special access to the regional leadership of the Arab Socialist Baath Party, and cancels the previous organizational plan on the land known as the "free zone" land, which was set aside for the "Solidere Damascus" project that the al-Diyar Regional Company was originally going to implement.

Sabban helped secure the Decision No. 775 project, which requested that the Property Directorate estimate the value of the new division. The market value of this area would have been hundreds of millions of Syrian pounds. He also issued Decision No. 908, which provided an arbitrated value for the land as a compensation for its appropriation as a public good. For Bisher al-Sabban, the "public good" apparently includes giving land to the ruling Baath party.

On 18 August 2016, the Governorate of Damascus executed Legislative Decree No. 66. It warned around 150,000 citizens in al-Mezzeh-Basatin to leave their homes so that the decree could be implemented. It did so for the sake of establishing a beautiful residential area with the proposed name of "Damascus Dream" or "Chamomile City." Within a week of the

warning, the governorate began to demolish civilians' houses with the support of security forces who suppressed inhabitants who protested the demolition, and prevented them from approaching their own homes. Those who remained in their homes were forcibly removed, and then the houses were destroyed.

In April 2018, Bashar al-Assad issued Law No. 10, which gave the regime the right to appropriate the property of Syrian refugees and displaced persons in the case that they are unable to prove that they own homes, many of which had been reduced to rubble by air strikes. Bisher al-Shabban is one of the most prominent individuals behind this law. He attempted to apply the law as soon as it was issued by preventing tens of thousands of people from entering the al-Tadamun neighborhood to return to their homes, using the excuse that the houses were unfit for habitation.

The governorate also issued a decision to demolish shops and businesses near the Umayyad Mosque and the ancient columns adjacent to it. This is a controversial project of the Iranian authorities, which are attempting to settle Iranian-backed militia fighters in Old Damascus, especially near the Umayyad Mosque, and around the shrine of Sayyidah Ruqayyah, which is not far from the Umayyad Mosque. According to informed sources, there is an "occupation of old Damascus through the purchase of real estate at high sums, especially around the Umayyad Mosque, in al-Qaymarriyyah, in front of the shrine of Sayyidah Ruqayyah, and in the Bab Tuma and Bab Sharqi neighborhoods."

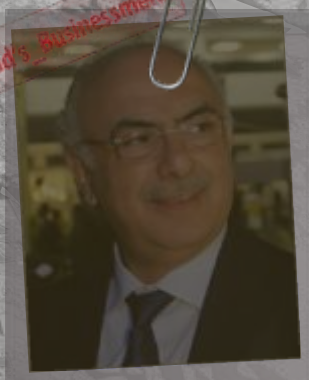
Sabban is one of the major beneficiaries of these demolitions and appropriations as president of the Damascus Cham Holding Company, which is responsible for the implementation

of the Marota City project. This project was announced by Bashar al-Assad via Legislative Decree No. 66 of 2012 and its amendments, and includes the areas to the southeast of al-Mezzeh in Basatin al-Sabbar and the area behind the Iranian embassy, al-Razi Clinic, and al-Lawan in Kafr Susah. There is also the "Basilia City" project, which includes the neighborhoods that participated most actively in demonstrations against the regime, especially Darayya, al-Qadam, 'Asali, and Yarmuk camp. Assad is attempting to punish these areas by issuing laws to establish projects to appropriate their land, with the goal of expelling the inhabitants of these areas from their homes and neighborhoods.

Bisher al-Sabban is married to the niece of the former governor of Homs Iyad Ghazal, who is a personal friend of Bashar al-Assad. Sabban also enjoys a close relationship with Muhammad Makhluf and his scion, Rami Makhluf. This enabled him to remain in his position as governor of Damascus for nearly 12 years, despite his involvement in corruption.

On 28 October 2016, the European Union issued a sanctions list that included dozens of figures close to the Syrian regime, including three governors, the most prominent of which was Bisher al-Sabban. The list included the following accusations against him: supporting security and militia members under his command, and issuing direct orders to target civilians in Eastern Ghouta and other areas. These set of accusations against the Governor of Damascus, Bisher al-Sabban, seemed somewhat different from other accusations: the official gazette of the European Union noted that the reasons for imposing sanctions upon Sabban were his status as "a person responsible for the violent suppression of Syrian civilians, including discrimination against Sunnis in Damascus."

On 26 November 2018, Bashar al-Assad issued Legislative Decree No. 363 stipulating the removal of Bashar al-Sabban from his position as Governor of Damascus, and appointing of ‘Adel al-‘Ulabi as his successor.



Mohamad Al-Sawah

Place of Birth:
Damascus 1963

Head of the Syrian Exporters Federation, and a prime commercial facade employed by the Syrian regime to to circumvent international sanctions.

Owns a well known textile factory, which exports to the GCC and EU countries including France and to "NTG" company in Italy.

Engagements: Accused of laundering millions of pounds for the Syrian Regime and helping it to evade international sanctions.

Mohamad al-Sawah was born to a well known Sunni Family in Damascus, and entered into the of textile industry at the age of 22, and established his first textile factory. In the 1990s, he began to export operations into other Arab countries then later into European countries, opening his first export warehouse center in the Gulf region in 2000, and another in France in 2003. He also founded the NTG company in Italy in 2008. Additionally, he became a member of the MOTEX exhibition committee in Damascus and treasurer of the Board of Trustees of the History of Damascus Foundation.

Sawah is considered one of the most prominent Damascene businessmen to support the Assad regime, which prompted Bashar al-Assad to reward him by appointing him to various positions. He was put in charge of the weaving and wool committees in 2000, and then became Vice-President of the

Exporters' Associations' Union, a post which he held for six years, before being named as President in 2014.

At the outbreak of the peaceful protests in 2011, Sawah proceeded to support the regime and played a key role in polishing the image of the regime externally and supporting it internally, through his network of connections outside Syria, holding exhibitions of his products abroad. He was the first Damascene businessman to hold an exhibition in Iran and encouraged other Damascene businessmen to visit Iran and build business relationships with the country. At the same time he worked on bringing Iranian companies to Damascus and played a key role in their acquisition of real estate and large facilities under the pretext of them being trading warehouses. Moreover, sought to reactivate the Damascus International Fair after five years of stoppage. He visited a number of Arab and foreign countries and used his personal relations with businessmen to bring them to the exhibition and participate in events and claim that they represent their countries.

In 2014, Mohamad al-Sawah set the date of the reboot of the first industrial city in "Hosh Plass" (Fadloun Farm Area), under his supervision and the supervision of the exporters' union members (July 14, 2014). It was hoped that this step would push towards the rebuilding of Syrian industry, and reactivate more than 500 factories and workshops, through the reconstruction of the roads and rehabilitation of the infrastructures in collaboration between the Syrian Exporters' union and Rif Dimashq Governorate and the competent ministries. However, this project did not see the light.

In the meantime, Mohamad al-Sawah benefited from the corruption networks inside the Regime institutions, where he was accused of making millions by manipulating the Syrian

Exporters' union and using it to serve his personal benefits, and making big profits for him and his affiliated firms, in the name of his right hand man Fares Kertly.

Moreover, sources talk about Sawah misusing his position to issue decisions in his own benefit. He established a company affiliated with the exporters' union that he heads, which is illegal, and that cleared the way for the establishment of four permanent centers for Syrian products abroad in Tehran, Moscow, Baghdad, and Algeria, and restricted any activities in those centers to his own firms.

In spite of the corruption accusations he is facing, Mohamad al-Sawah was rewarded with a legislative decree (127/2017) by Bashar al-Assad, which exempts textile materials from 50 percent of customs duties. It is the same decree that Aleppo industrialists revolted against, considering that it hurts their textile industry, as they make their textiles it rather than importing them. The beneficiary of this decree was Mohamad al-Sawah who owns a weaving factory famous for the clothes it make and exports to many Arab and European countries. On Oct. 20, 2018, Sawah visited Iran with a delegation of Syrian Businessmen, Mohamad Hamsho being the most notable among them and where several cooperation agreements were signed with the Tehran Chamber of Commerce.

It is worth mentioning that Sawah kept issuing fake statements and publishing exaggerated figures on the Syrian export situation, in the context of the media war. Where the main goal of broadcasting fake information, was to empower the criminal military machine of the regime, enabling Sawah to keep his positions, and promote his trade in cooperation with the head of the regime. Many of the commercial field workers confirm that Mohamad al-Sawah, is only one of the many commercial

and economic fronts the Syrian regime uses in order to control export operations and circumvent the sanctions imposed on it, and to claim that Damascene businesspersons stood by the regime in the face of «crisis».



Ammar Al-Sharif

Manages many companies in the banking, insurance and hotel management sectors, and is considered one of the most prominent disguised shadow men for Rami Makhlouf.

Owns 'Tikkary of Shore L.L.C' company in Lebanon, and he is a shareholder and founder of 'Byblos Bank-Syria', and a prime shareholder in the 'Unlimited Hospitality' company.

Engagements: Accused of helping the Syrian regime to find a way around the international sanctions. Subject to European Union sanctions since 2016, his name appears in the "Paradise" and "Panama" lists, accused of registering many fake companies off shore in collaboration with Rami Makhlouf.

Businessman Ammar al-Sharif works in the shadows. Since he was presented with his bachelor's degree in economics, he has provided significant support to Rami Makhlouf and his father-in-law, the Syrian Ambassador in Romania, Walid Othman. He is one of the most prominent invisible men used by Rami Makhlouf. Walid Othman and his two sons Qaswara and Ali are participating in several companies in Romania. Moreover, Ammar is one of Nader al-Qalai's partners.

Ammar al-Sharif is active in the banking, insurance, and hospitality sectors:

- He is the founding partner of Byblos Bank Syria
- A major shareholder in Unlimited Hospitality Company
- A board member of Solidarity Alliance Insurance
- A board member of al-Aqueelah Takaful Insurance

- A representative of Midtrade on the Board of Directors of al-Mashreq Investment Fund
- A board member of Promedia Incorporated Company.
- A board member of Olivana

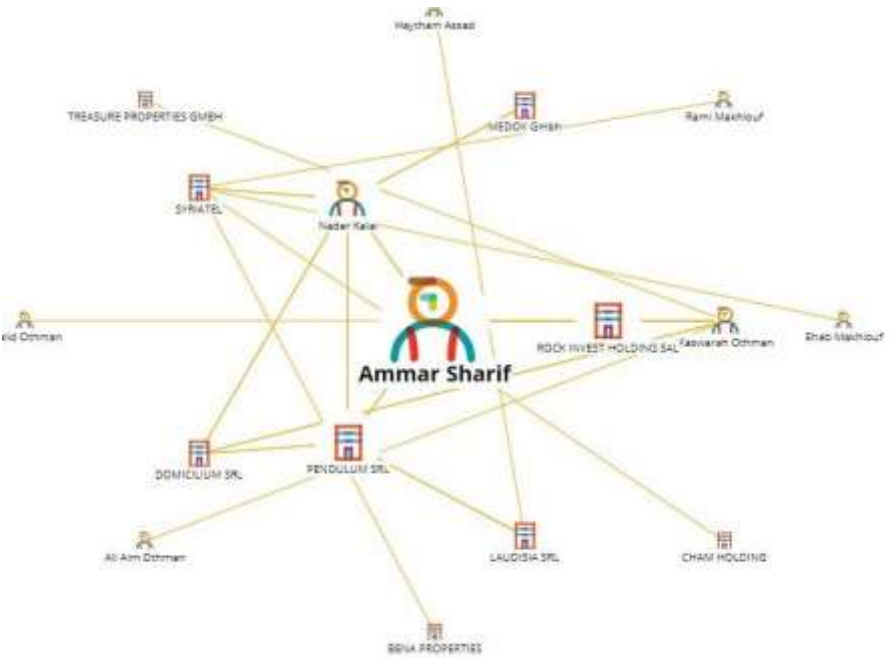
He also owns Ticari SAL, an offshore company in Lebanon, where the two businessmen Samer Murtada and Adnan al-Ali are board members.

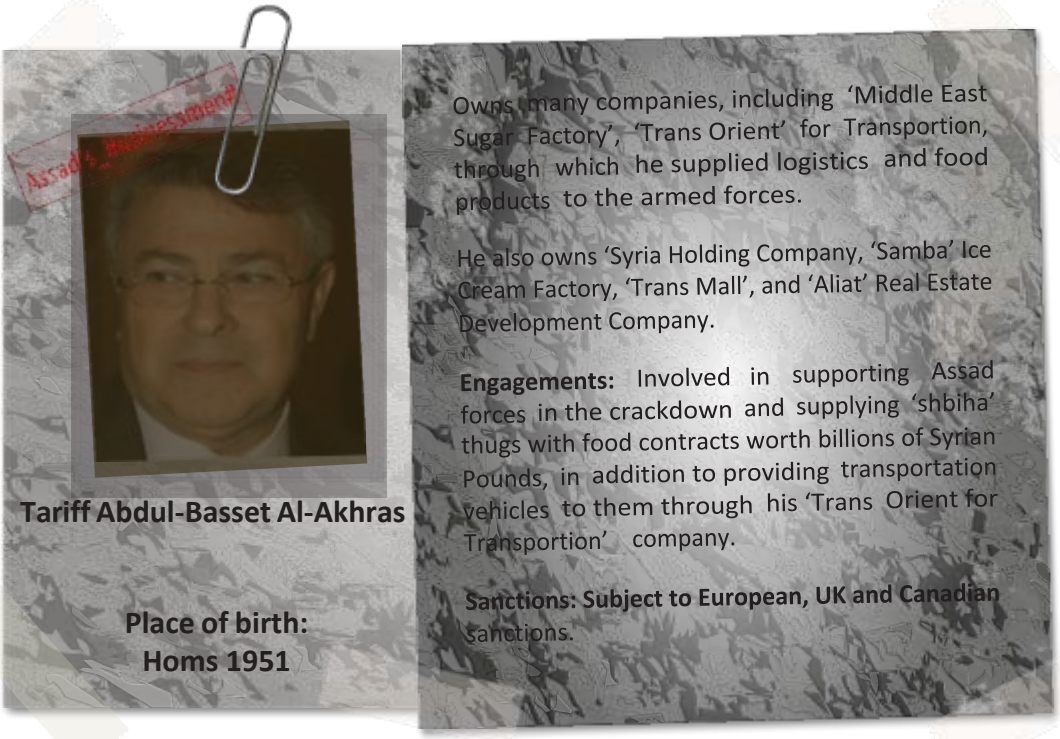
In 2005, when Nader al-Qalai established a branch of his Lebanese company Rock Invest Holding SAL in Bucharest under the brand name KFT Domicilium, Sharif was the mother company's representative, in collaboration with Qaswarah Othman, son of Walid Othman, the Syrian Ambassador in Romania.

Ammar al-Sharif has interconnected relations with Rami Makhlouf, Eyhab Makhlouf, Walid, Ali and Qaswara Othman, in addition to Nader al-Qalai, Haitham al-Assad and their affiliated companies.

As a result of his extensive activity in suspicious businesses that support the Syrian regime, Ammar al-Sharif is mentioned in the Paradise Papers leaks and the Panama Documents published in 2016, by the German newspaper Süddeutsche Zeitung and the International Consortium of Investigative Journalists (ICIJ) in 2016. Those papers accused him of «collaborating with Rami Makhlouf» in registering multiple shell corporations in remote tax havens, which allowed him and his family and close friends, to evade the sanctions imposed on him, and because of that, his name was listed in the EU sanctions of 2016.

Below is an illustration of Ammar al-Sharif's interconnected relations





Tarif al-Akhras (b. 1951, Homs) established his business group in 1973, starting with a small engineering firm, which became a major group that owns:

- Middle East sugar plant
- Solina Oils plant
- Middle East Feed Factory
- Trans Béton, a constructions supplies company
- Samba Ice Cream and Dairy Factory.

At the beginning of 21st century, Tarif al-Akhras benefited from the overlapping relations between the Assad family and the Akhras family, especially after the relationship between Bashar al-Assad and Asmaa al-Akhras in Britain in the 1990s and their

marriage later in the year 2000. He entered the business of supplying the Syrian military with goods including oils, sugar, and other essential materials, benefiting from the corruption in the military institution, which added to his wealth and helped the projects he launched later, including a sugar plant with production capacity up to 700 tons per year.

Tarif al-Akhras expanded his activities when he invested in Hassiaa industrial city in Homs. He invested billions of Syrian pounds in various sectors like sugar, oils, mills, beef and meat canning, bananas, fish, concrete and steel.

He established a land and maritime transportation company called Trans Orient, and a mall called Trans Mall.

Akhras also worked in the real estate development sector where he established a company called Aaliat that executed the Homs Suburb project.

In return to Rami Makhlouf for establishing Sham Holding, Tarif al-Akhras established Syria Holding.

He also established Arabia Insurance Cooperative Company; chaired the Syrian Union for Grains Manufacturing; published al-Khabar weekly newspaper. He was also Chairman of the al-Taj company for industrial investments and Bank of Jordan Syria, assisted by his children Murhaf, Diana and Nora.

During the office of Eyad Ghazal, a personal friend of Bashar al-Assad's, Homs as Governor of Homs, Tarif al-Akhras benefited a great deal from his relationship with him.

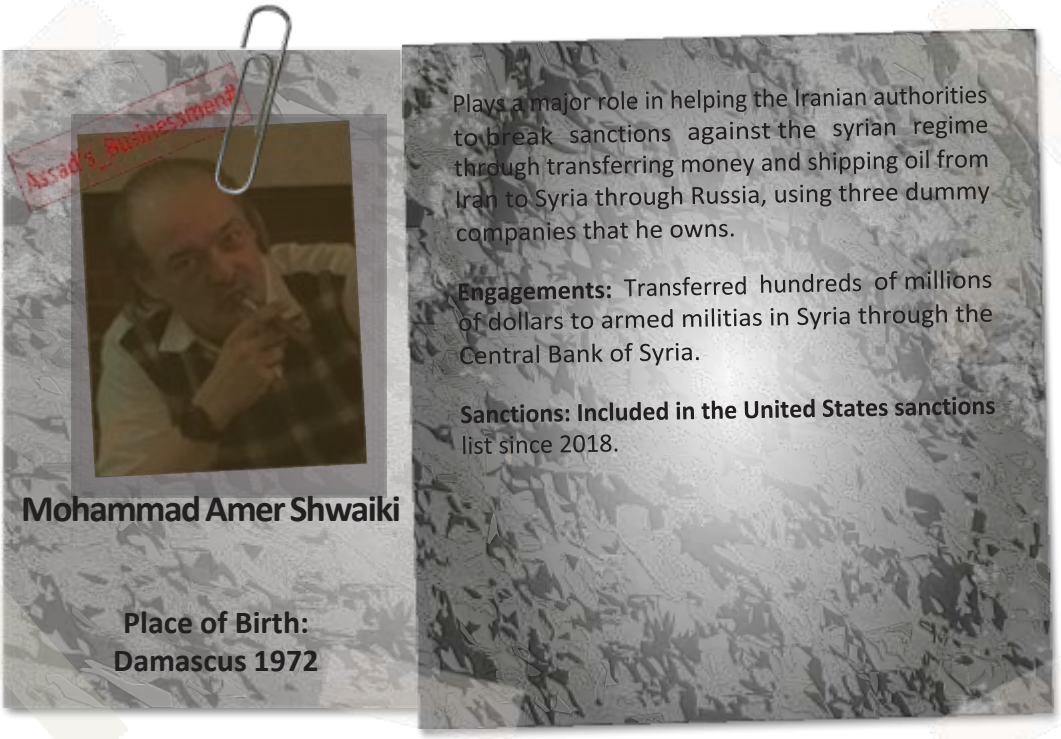
Tarif al-Akhras is one of the regime's most prominent economic figures. He gave support to Fawaz al-Akhras, Asmaa's father,

and her brothers who in return gave him exclusive investments in Britain.

At the outbreak of the protests in March 2011, Tarif supported regime forces in suppressing them, by providing them with food though contracts worth billions of Syrian pounds. He also provided them with transportation vehicles from his company Trans Orient, as well as sponsoring a division of pro-regime para-forces in his hometown of Homs. This prompted the regime to support his businesses and projects by various means.

Britain, the EU and Canada listed Tarif al-Akhras on their sanctions lists, for his role in supporting the regime forces ‹ violations and suppression acts, and a British court sentenced him to one year in prison for contempt.

However, this did not prevent the Lebanese authorities from granting him Lebanese citizenship in 2014. This happened in conjunction with the granting of Lebanese citizenship to Eyad Ghazal and others, under the rule of former President Michel Suleiman. Lebanese citizenship was a way for regime figures to escape the sanctions imposed on them.



Mohammad Amer Mohammad Akram Shwaiki (b. 1972, Damascus) is one of the shadow businessmen on whom the Iranian and Syrian regimes rely to elude sanctions, and traffic funds and oil from Iran to Syria and Lebanese Hezbollah. Unlike the rest of the businessmen supporting the regime, Shwaiki didn't appear directly or even semi-directly, but he secretly ran his businesses until he was listed on the US sanctions list on Nov. 20, 2018, when the US Treasury Department detailed what Mohammad Shwaiki is doing with a group of six people and three entities, which were listed later on the US sanctions list.

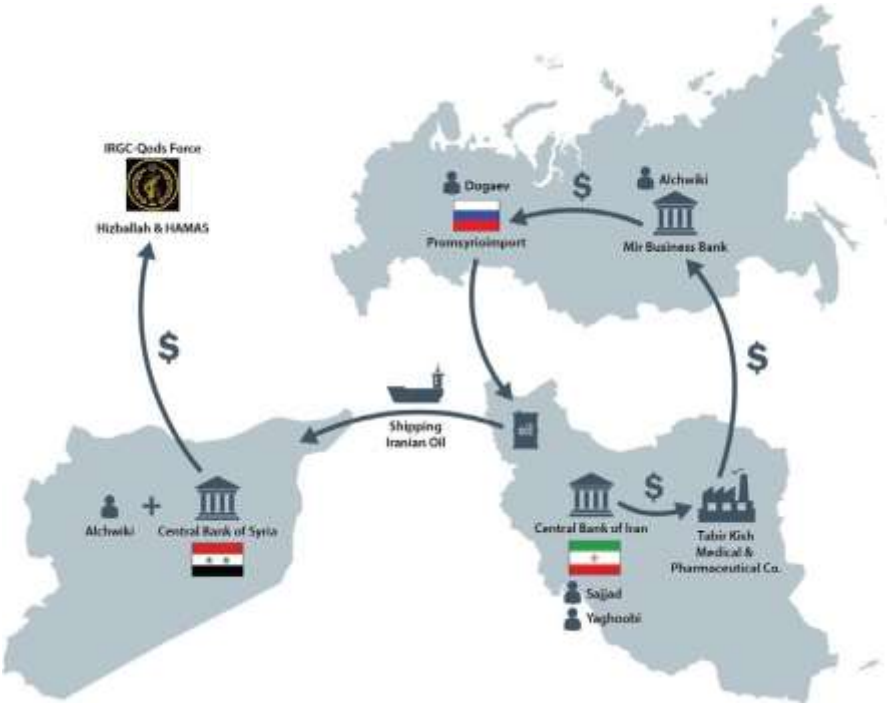
Early in 2011, Mohammad Shwaiki co-founded Takreer Company, an oil refining company in the Damascus Countryside, with two percent of its shares. He is also a the co-founder and director of Global Vision Investment (GVI) and owns 50 percent of its shares, and also is a general manager and co-founder of

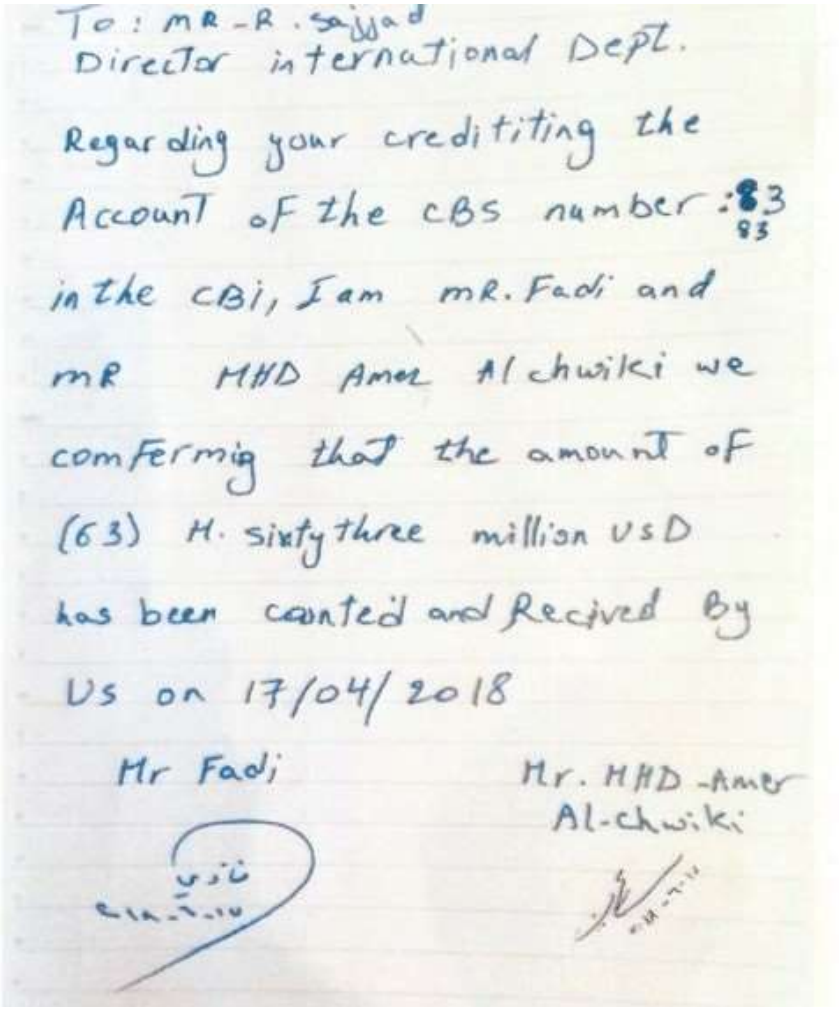
Jalanbu & Shwaiki Company and owns 50 percent of its shares. The sum of all the capital from those three companies doesn't exceed 5 million Syrian pounds, which offers a clear picture of them being shell companies participating in eluding sanctions and trafficking money and oil through Russia to Syria.

The US Treasury Department published a chart detailing the working mechanism used by Mohammad Shwaiki, who resides in Russia, in cooperation with individuals and entities that form an interconnected network and utilizes GVI to hide its activities.

GVI works in cooperation with Prom Syrio Import (PSI), which is affiliated with the Russian Ministry of Energy, to facilitate the shipping of Iranian oil from the Iranian National Oil Company to Syria and uses several ships, many of them were provided by European companies at least since 2014. The ships disabled the auto-identification system as a means of hiding the true final destination of the Iranian oil. In return, the Iranian central bank deposits funds into Shwaiki's account at the Mir Business Bank in Russia, through Tadbir Kish, an Iranian Medical and Pharmaceutical Company, then Shwaiki transfers payments to PSI. The Mir Business Bank is owned entirely by Bank Melli Iran. Mir Bank is a conduit for the implementation of the IRGC's financial services, where both Rasul Sajid, the director of CBI's International Department, and Hossein Yaqoubi, the CBI's managing director for international affairs, facilitated Mohammad Shwaiki's work. PSI's deputy director Andrei Dogayev work closely with Yaqoubi to coordinate the selling and payment delivery operations.

Shwaiki also transfers hundreds of millions of dollars to several armed militias in Syria through the Central Bank of Syria, as well as paying hundreds of millions of dollars to Mohammad al-Qasseir for moving arms, money, and military technology from Syria to Lebanon, helped by Mohammad Qassem al-Bazzal.


IRGC-Qods Force
Hizballah & HAMAS
Dogaev
Promsyrioimport
$
Alchwiki
Mir Business Bank
$
$
Shipping
Iranian Oil
Alchwiki
+
Central Bank of Syria
Central Bank of Iran
$
Tabir Kish
Medical &
Pharmaceutical Co.
Sajjad
Yaghoobi



To: MR-R. Sajjad
Director international Dept.

Regarding your crediting the Account of the CBS number: 83 93 in the CBi, I am mR. Fadi and mR MHD Amer Al chwiki we comfermig that the amount of (63) H. sixty three million USD has been counted and Recived By Us on 17/04/2018

Mr Fadi

Mr. MHD-Amer Al-chwiki

A Letter to Rasul Sajid confirming receipt of 63 million dollars by Mohammad Shwaiki.



Mohammad Hasan Abbas

Place of birth:
Lattakia 1964

Commercial representative of Rami Makhlouf, runs his companies in Lebanon, Romania and the Czech Republic, including 'The Wings' and 'Barley offshore'.

Possesses a number of casinos in Prague.

Engagements: Involved in broadcasting pro-regime propaganda through his media channels in the Czech Republic and Romania., including 'Heart of Europe'.

Mohammad Hasan Abbas (b. 1964, Lattakia) is a businessman and one of the most prominent relatives of Rami Makhlouf, participating with him in the Middle East Legal Services Company. Abbas is involved in a host of other companies, including:

- Wings (Al-Ajnihah) based in Damascus - Director
- Barly Off-Shore in Beirut, Co-founder shareholder, and Managing Director
- Al-Jawhara Imports and Exports - Partner 25 percent
- Syrian Specialized Company for Projects- Co-founder
- Yassmin for Media Services.
- Specialized Syrian Transportation and Transit Company
- Syrian Italian United Co for Olive Oil exports
- Olivana - Oils Company
- Al-Madina Company

- Syrian Company for Olive Oil exports
- He is also a co-founding partner in Cham Holding Company

Abbas is one of Rami Makhlouf's business fronts, he runs companies affiliated with Makhlouf in Lebanon, Romania, and the Czech Republic. The leaked documents, which became known as the Panama Papers, revealed Abbas's relationship with Rami, Ehab, and Mohammad Makhlouf, who are using his name to escape the sanctions imposed on them by the US and EU.

He runs several casinos in Prague and also runs a TV channel called Heart of Europe, which broadcasts pro-regime programs, and he funds a pro-regime groups in the Czech Republic and Romania.

Abbas is a direct partner in the trafficking and laundering of Rami Makhlouf's money, with reports estimating his assistance in smuggling about 47 billion dollars from Syria into the the Czech Republic and other countries.



A photograph of Mohammad Abbas at a pro-regime rallies in Prague, Czechia.



Mazen Hani Murtada

Place of birth:
Damascus 1974

Son of the former Minister of Education Dr. Hani Mortada who has good rapport with Assad family and and on of the regime's henchmen in the business sector.

Engagements: Subsidized several projects in the Sayyida Zainab shiite shrine nad its surroundings south of Damascus, through a number of companies like: 'Tartous for Paper Industries', 'Syrians Financial Group 24', and 'Strata for Contracting and Trade', using Iranian sources.

Paricipates in funding mercenarie (Shabiha) southern Damascus since 2011.

Mazen Murtada (b.1974, Damascus) graduated from Trinity College School in Canada in 1993, and from Concordia University with a major in Computer Systems Engineering and holds a degree in Investment and Finance from Middlesex University in London. He is the son of Hani Murtada, the former Minister of Higher Education.

Mazen is:

- A co-founder and has occupied a seat on the Board of Directors of "One Hundred Eighty Company".
- A co-founder of Tartous Company for Paper Industries.
- A co-founder of the Syrian Financial Group.
- A co-founding partner of Strata Contracting.
- A partner in Dashti Sons Investments Group with Abdul Hamid Abbas Dashti.

• Vice-Chairman of Al-Aqeelah Takaful Insurance Company, a private insurance company, and the most powerful in Syria with a capital of 2 billion Syrian pounds, co-managed by the Dashti family.
• He was appointed as National President of JCI Syria as one of its founders.



Hani Murtada

Although Mazen's father is not a member of the Baath Party, Bashar al-Assad appointed him President of Damascus University between 2000 and 2003, and a Minister of Higher Education (2003-2006), and he is the personal doctor of Assad's children.

As a result of his closeness to the Assad family, Bashar tasked him with managing the shrine of Sayyida Zeinab south of Damascus. Hani Murtada denies any ties with the Iranian Regime and says that he inherited the shrine management task from his ancestors, since they started managing its affairs 750 years ago.

Mazen is accused of funding several projects associated with the shrine of Sayyida Zeinab using Iranian funds, in addition to supporting shabiha gangs in the region since 2011, he is one of the regime's men and most prominent fronts.

It is worth mentioning that Mazen Murtada and his and his brothers obtained Lebanese citizenship in May 2018, along with several other regime affiliated Syrian businessmen like Samer Foz, Abdulqader Sabra, the former director of the Chamber of Maritime Navigations, and Faruq Jude, the chairman of the Chamber of Commerce and Industry of Lattakia, all of them are supporters of the regime, working as fronts abroad.



Samer Al-Debs

Place of birth:
Damascus 1962

Chairman of Chamber of Industry in Damascus and its countryside.

a member of the Syrian parliament for two periods respectively and a commercial façade for Rami Makhlouf.

Owns packing, paper and cardboard factories. He resorted later to establishing other companies under the name of his wife, "Ghaliya Maydani" to evade international sanctions imposed against him.

Engagements: Paricipated in regime's extensive activities to evade international sanctions and in Assad's propaganda campaign.

Sanctions: Included in the United States Treasury sanctions list.

Samer Mohammad Al-Debs (b.1962, Damascus) received a bachelor's degree in Business Administration from a Lebanese university in 1983. He traveled afterward to Nigeria and came back to Syria five years later in 1988, where he established packaging plants and paper factories. He is connected to Maher al-Assad and is one of his business fronts.

Debs has been the President of the Syrian-Australian Business Council since its establishment by a group of businessmen in 2009. He has been a member of the People's Assembly for two consecutive terms (2012-2016 and 2016-2020), and a member of the Financial Laws committee during those two terms, and he has been the President of the Chamber of Industry of Damascus and its Countryside since 2014.

Samer al-Debs, through his membership to parliament and the Chamber of Industry of Damascus, is running his activities to support the Syrian regime, by building multiple partnerships with Mohammad Hamsho, Khalid Kaddour, and others, to establish an economic front for the regime. He threatened Ghassan Abboud, the owner of Orient TV Channel, who was once with the «Assad loyalists» because of his pro-revolution stands.

In 2013, Debs established a company in the name of Ghalia Midani, his wife, to elude the sanctions imposed on him and other pro-regime businessmen.

Throughout his presidency of the Chamber of Industry of Damascus and its Countryside, Debs played a key role in mobilizing industrialists to stand with the Syrian regime, in exchange of privileges granted to them, and pledges to secure their businesses through mediations with Maher al-Assad, and he kept on polishing the image of the regime in media, where he stated in one of his interviews: «our steadfastness comes from the steadfastness of President Assad and the power of the Syrian Arab Army»



Mohammad Samer Afdar

Place of Birth:
Damascus 1970

A major banker operating money transfers and EFT payments sector working for the benefit of Makhlouf.

Operates 'Wester Union' Company for money transfer in Syria, and owns many companies in the financial sector including 'Bitakat', 'AL-Jadidah', 'Tawasol', 'TGHN' and 'Al-Diyar' for Exchange.

Engagements: Provides the intelligence directorate lists and other information contributing to the regime's aggression campaign in addition to particiapting in its efforts to evade international sanctions.

Mohammad Samer Mohammad Mazhar Afdar (b.1970, Damascus) was born into a middle-class family. He studied mechanical engineering at Damascus University, then he started his first business in the al-Sufaraa Print House, owned by his father, on Maisaloun Street in Damascus, where he printed publications for the global money transfer company Western Union, and later tured himself into banking and money transfer businesses, and become a partner in both Aldiar and Tawasol exchange companies. He later became an agent for Western Union in Syria and occupied the General Manager position.

He established the company Cards and became its general manager, and established Tawasol Media and Advertising, and the Al-Jadedia Company.

He is a co-founding partner of Tawasol Telecommunication and also the TGHN company in Syria.

It is worth mentioning that Aldiar was the first licensed money transfer company in Syria in 2007, with a capital of 2 billion Syrian pounds.

When the peaceful protests started in 2011, Afdar started handing the list, for the Syrian security forces, of all funds sent from abroad to aid the opposition, and used his privileged access to the Western Union database, as a branch manager, to hand the Syrian Security Forces all details related to wanted people, both inside the country and abroad.

In addition to services he provided to the Syrian security forces, Afdar is one of the most prominent economic fronts of Rami Makhlouf, through his brother Col. Hafiz Makhlouf, who has been a very close friend of Afdar since their studied together in Laique School in Damascus (later called Bassel al-Assad School).

With the support of Rami Makhlouf, Afdar became one of the important bankers in Syria, where he dominated the remittance sector and helped Rami Makhlouf in the acquisition of communication and remittance sectors of the country, and as per a report published by the Daraj media platform titled: Paradise Documents: Offshore Lebanon a platform for Syrian elite and partnerships of Lebanese citizens with Syrian businessmen.

In June 2011, Afdar partnered with Lebanese politicians to establish a financial company called M – PAYMENTS VENTURE HOLDING S.A.L. Amal Hikmat Abu Zaid, a member of the Change and Reform bloc in the Lebanese parliament, was the chairman of the company, and Emad Saleh al-Mashnouq, brother of

Interior Minister Nohad Machnouk, was one of the major partners, he owned 270 shares, in addition to lawyer Tawfiq Mo'awad, president of the Maronite League, who owned 405 shares, and Afdar who owned 110 shares in the company that played a big role in leaking important information about Syrian citizens and their relatives inside Syria and abroad.

Afdar established two companies for electronic payments and financial and tourism investments, with a capital of 185 million Syrian pounds. The Ministry of Internal Trade and Consumer Protection ratified the statute of electronic payment cards company, with a capital of 25 million Syrian pounds.

He also established along with his children, Tolin and Ghassan, a company named TGHN with a capital of 160 Million Syrian pounds, to participate in the establishment of development projects, through partnership with companies, banks, financial institutions, and social banking (micro-finance institutions). The establishment and investment in services, tourism and commercial institutions, and owning, renting, and 2 in real estate and cars was needed to realize the purpose of the company.

The statute of this company, which was ratified by the Ministry of Internal Trade and Consumer Protection on Jul. 26, 2018, states that the company has the right to amend its goal totally, or partially by a decision of general authority, without considering that amendment as a new entity. The capital was divided into 160,000 shares, with a share price of 1,000 Syrian pounds. Samer owned 159,998 shares, and the two remaining shares were owned by his two children Tolin, 11, and Ghassan, 4. One of the fun facts about this company is that its statute states that the Managing Director is either one of the shareholders or a third party, and is appointed by the general authority (Afdar

and his children) and practiced his work under the powers set out in the Companies Act, and to be run by Afdar, for a term of four years, renewable by a decision of the general authority.

Although Samer Afdar is dominating the remittance and electronic payment sectors, he is in fact just a front, working invisibly for the Makhlouf family to enable Maher to elude sanctions and move globally through companies, and partnerships formed for such purposes.



Occupation: Employed by the Syrian regime to evade international sanctions and provide its army with the fuel through a network of companies abroad

His 'Abdulkarim Group' comprises many companies operating inside Syria in addition to international companies operating in the oil industry in addition to engines and mechanical equipment.

Engagements: Supported regime forces logistically through his companies that provided them with fuel shipments and importing necessary parts for planes and tanks that killed hundreds of thousands of Syrians.

Sanctions: Many of his cokpanies are subjest to US Treasury snactions.

Wael Abdel Karim, a Palestinian-Syrian who also hold American citizenship, is one of the most prominent businessmen that supported Assad in his crimes, from abroad, where he provided logistical support through his companies to regime forces, like fuel shipments, and technologies that enabled the regime to commit a broad range of violations against Syrian people.

The Abdel Karim Group is located in UAE and uses cargo ships to deliver fuel to the Syrian regime, where it would change its destination, and hide their identification signals that's picked up radars, using shell, and offshore companies including:

- Pangates International Corporation Ltd
- MAXIMA
- The Eagles LLC
- Morgan Additives Manufacturing Co

- Millennium Shipping
- JAKOC Petroleum Limited
- Vectra international trading

These companies are of the invisible arms of the regime outside of Syria, which led to their classification on the US sanctions lists. But the people behind these companies managed to elude those sanctions, by constantly changing managers and company names. Over the past few years, changes to the Abdel Karim Group have included:

- Apr. 16, 2012: Wael Abdel Karim appointed as company manager, and Ahmad Barqawi a branch manager in Mount Ali, Dubai.
- Jun. 11, 2013: Wael assigns a few shares to his brother Fadi.
- Nov. 4, 2014: Wael is elected president of the company, Ahmad Barqawi resigned from his position, and appoints his brother Nassim as his replacement in Mount Ali branch.
- Dec. 17, 2014: US sanctions are imposed on Wael Abdel Karim and Samer Barqawi.
- Dec. 30, 2014: Wael Abdel Karim resigns from his position as the company manager.
- Dec. 30, 2014: Sulaiman Rasheed Khamees (UAE Citizen) becomes a new shareholder, manager, and then president of the company.
- Dec. 30, 2014: Wael and Fadi Abdel Karim transfer their shares in the company (1 million shares) to Sulaiman Rasheed Khamees.
- Feb. 25, 2015: Sulaiman resigns from his position, and Yasser Mahmoud al-Barazi becomes his replacement.
- Feb. 25, 2015: Nassim Barqawi resigns from his position as a manager of the Mount Ali branch, and Yasser Barazi takes his place.

After all those changes, Jamal Abdel Karim's name doesn't get mentioned in the US rulings, although his name is mentioned as a founding partner of the company, and owning 150,000 of its shares.

The Abdel Karim Group also worked with other companies to elude sanctions, like EBLA TRADE SERVICES S.A.L., a Lebanese company established in 2013, and registered as an offshore company. It was the shipping company that moved shipments to Banias Port, and is owned by 13 Syrian and Lebanese shareholders and signees, led by two of Muhammad Hamsho's sons Ahmad Saber and Amr (EU and US sanctions are listing their father) as mentioned in the company records, along with the sons of a Lebanese businessman of Syrian origins, Mohammad Hashim al-Soufi.

The Abdel Karim Group also owns companies inside Syria that represent international companies working in the fields of mineral oils and derivatives, engines and mechanical equipment.

The group is run by several figures who play a key role in helping the Syrian regime, and enabling them to commit violations against the Syrian people:

- Wael Abdel Karim, (Palestinian/ Syrian, holding American Citizenship)
- Jamal Abdel Karim, (Palestinian/ Syrian, holding American Citizenship)
- Fadi Abdel Karim
- Adnan Ibrahim Abdel Karim
- Ahmad Barqawi
- Nassim Barqawi
- Yasser Mahmoud Barazi, Palestinian citizen

In addition to supporting the regime in committing violations, those people helped the regime in eluding the sanctions imposed on the regime, and providing the needed pieces of equipment and replacement hardware to maintain operational warplanes and tanks that killed thousands of Syrian citizens.



Mohammad Murtada Al-Dandashi

Place of birth:
Tal-Kalakh 1971

Major financial broker in the stock market and owner of many real estate companies in connection with Rami Makhlouf, including 'Al-Ramz Capital', 'Saif' Investment compnay, 'Dar Gardenia' and 'Sham Capital' company.

Engagements: His 'Al-Dandashi' Investment Group works in repairing and restoring government buildings and security quarters along with equiping the security branches with vehicles and other logistics.

Sanctions: His name appreaed in 'WikiLeaks' as one of the four most prominent businessmen who contributed to financing the regime and laundering money for its numerous agencies.

Mohammad Murtada al-Dandashi (b.1971, Tel-Kalakh) belongs to one of the feudal families in the area, who lost their fortune after the Baath Party coup. Mohammad earned his degree in economics from the University of Aleppo, and started his business in the UAE, where he worked in the stock market with the help of a Yemeni businessman whose daughter he married.

Mohammad al-Dandashi is a co-founding partner of several companies:

- Al-Ramz Capital in UAE and Syria
- Saif Investments
- Dar al-Gardenia
- Cham Capital
- National Company for precast concrete
- Gardenia for real estate investments

- Sama Syria
- He is a member of Byblos Bank's Board of Directors in Syria.
- Syriatel (he was a representative and a member of the Board of Directors of HiTS-UNITEL trading as «Y») in addition to Nader al-Qalai, Rami Makhlouf's man who occupied the position of the president of the company.
- Dubai Development Company
- Union Insurance Company
- He also served as the president of the Karama Football Club.

The Al-Ramz Company is Dandashi's main business, specializing in financial brokerage operations, it previously managed to become the top company in UAE for financial brokerage in 2014.

At the outbreak of peaceful protests in 2011, several pro-regime figures accused Dandashi of standing against the Syrian regime and accused him of supporting Free Syrian Army members, and inciting terrorism, which prompted the regime to seize all movable and immovable properties. However, the ban was later lifted in March 2013. Since the ban was lifted, and especially after the capture of Tel Kalakh city, Dandashi has supported the regime in a number of ways:

He reopened the Al-Ber free clinic that offered medical services in the city, which had been closed since the beginning of protests.

He also reopened the Islamic school in the Burj neighborhood. All newly appointed employees and the director of the school were pro-regime.

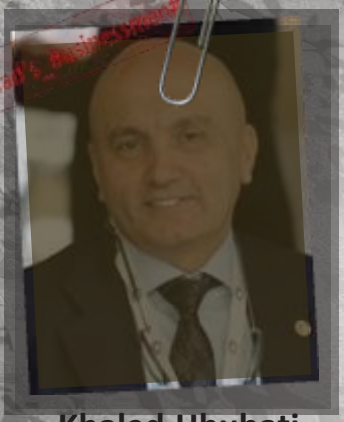
Built a new building in the city affiliated with the Awqaf authority in Damascus. A local pro-regime cleric was appointed as Mufti

of the city. Supported several pro-regime activities through the Baath party's branch in Tel Kalakh.

Rebuilding several governmental facilities and security posts, providing governmental cars to them. And providing scholarships to pro-regime students.

In order to accomplish that, Dandashi established, with the help of his business manager, Nedhal al-Kurdi, through his brother Yousef Dandashi, a business group called the Al-Dandashi Group, which was was responsible for the actions listed above.

It is worth mentioning that several American documents leaked by WikiLeaks mentioned Dandashi's name, considering him one of four businessmen participating in financing the Syrian regime and concealing its money. European observers submitted diplomatic notes dating back to the period between 2006 and 2009, and leaked by WikiLeaks, about the role Bashar al-Assad played in the assassination of former Lebanese Prime Minister Rafiq al-Hariri back in 2005. And according to the leaked documents, Rami Makhlouf deposited large sums of money into a bank account at the Damascus branch of the Lebanese Byblos Bank, which was in Dandashi's name. The same documents identified Dandashi as a Syrian businessman living in UAE, a big broker in the stock market, confirming that Dandashi is connected to real estate and commercial companies related to Rami Makhlouf.



Khaled Hbubati

Place of Birth:
Damascus 1957

Chairman of Syrian Red Crescent. Assigned by Assad as a special delegate to cooperate with loyal expat Syrian businessmen and investors to fund the regime.

Engagements: Through his 'East Gambling Club', in addition to the 'Ocean Club', 'Al-Rakhaa' Trading, 'Mira' for Services and Tourism, Hububati helped providing the Syrian regime with $30 billion and deployed the 'Red Crescent' to facilitate money transfers

Khaled Ahmad Tawfiq Hbubati (b. 1957, Damascus) is the son of Tawfiq Hbubati, who owned three casinos in Damascus: Bludan Casino, Airport Hotel Casino, and Orient Casino. These were closed by the Syrian authorities in 1977, by order of the prime minister at the time, Abdel Rahman Khlaifawi.

Khalid Hbubati holds an engineering degree and used to own the Orient Club which hosted an elite of Syrian businessmen and politicians from Syria and abroad, however, Khalid sold the club to Mwaffaq Qaddah in 2009.

Khalid Hbubati is considered a co-founding partner in multiple businesses, and the most important of them are:

- Managing Director and co-founding partner of Al-Muheet Club
- Co-founding partner of the Al-Rakhaa Company

- General Manager and co-founding partner of Mira Services
- General Manager and co-founding partner of Mira Tourism investments
- Co-founding partner of Lina Investments

Through his ownership of the Orient Club, Hbubati managed in 2010 to open the first casino by obtaining a legal license under the title of entertainment club and a tourism facility, which is something that caused issues with the People's Assembly, to a point where Naji al-Utri «the Prime Minister back then» was summoned to appear before the Parliament. Utri denied the allegations that he granted Hbubati any new license for a gambling club and that Hbubati has just renewed an old lisence that had been granted decades before to his father, Tawfiq Hbubati.

Informed sourced have spoken of the role Bashar al-Assad played in the launch of the casino, through an invisible partner, a plastic artist called Yasser Hammoud, who was tasked with several artworks like the tomb of Bassel al-Assad, and later, the tomb of Hafiz al-Assad and Majd al-Assad, in addition to the aforementioned casino. The plan was to include the opening of this casino with three other casinos distributed in several locations in Syria, one in the Ya'fur area of the Damascus countryside, the second in Palmyra, in the center of Syria, and the last one in Aleppo city. But the outbreak of the peaceful protests in 2011 changed those plans, and the mentioned casino was sealed by the authorities under pretenses of, "practicing acts that violate public morals and contravene laws and regulations. The seal should stay until the business is settled and following the current regulations and laws."

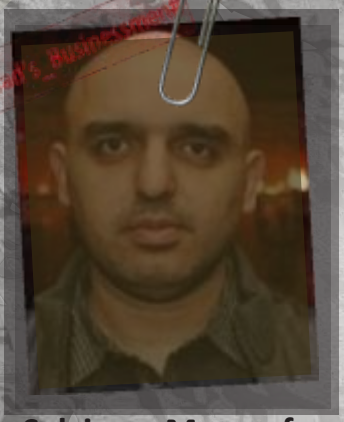
After the closure of the casino, Khaled Hbubati disappeared from Syrian economic life, to play invisible roles for the regime, where he served as a special envoy for Assad, working to secure the return of businessmen and investors, presenting them with guarantees of no prosecution nor property seizure. Businessman Feras Tlass' close circle in UAE mentions that Hbubati approached him several times and presented him with guarantees of no prosecution nor seizure of properties in exchange of a public apology to the regime, but Tlass declined that offer, and Hbubati did the same with other businessmen including Emad Ghriwati, Mwafaq Qaddah, and others who remained neutral.

At the end of 2016, Hubibati became the Director of the Syrian Arab Red Crescent (SARC), replacing Abdul Rahman al-Attar, who was forced to resign by an official order from Prime Minister Imad Khamis, although Hbubati isn't a member in the executive council nor the board of directors, nor even a staff member in the organization.

Since then, SARC became affiliated with Assad Regime and participated, according to a report published by the American Foreign Affairs magazine in September 2018, in supporting the regime indirectly, with about 30 billion dollars, which was used to pay salaries, and secure essential hardware for the security forces. SARC was used as a gateway to get those funds, in addition to the infiltration of the organization, by several members of the Syrian security forces pretending to be volunteers there, and as per reports by several former volunteers, the new unofficial policy of the SARC is to give UN aids to people in accordance to their opinion of the regime. Staff and volunteers who break those rules, would get arrested, and tortured, or even killed.

It is worth mentioning that Khaled Hbubati is a member of the Syrian Arab Horses Association, which includes several pro-regime businessmen, including Hani Makhlouf, Mohammad Hamsho, and Manal Jadaan (Maher al-Assad's wife). According to an employee in one of Mohammad Hamsho's establishments, "The participation of the ruling economic class in Syria in the so-called «horse business», is merely a cover for the movement of that class's money. It's also worth mentioning that Syria became a member of the Arabic Horse Organization founded in 1989, in Geneva, and includes 65 member countries, and identifies itself as a "non-profit organization interested in the genealogy of Arabian horses". Syria's membership facilitated the movement of funds to Switzerland, and covered a part of the money laundering operations done by entities close to the regime, in spite of the sanctions imposed as of 2011."

On Dec. 20, 2018, the Syrian Human Rights Observatory confirmed the arrest of the director of SARC, Khalid Hbubati by the security forces, on charges of corruption and embezzling funds, however, the SARC denied those allegations, and confirmed that Hbubati was visiting Geneva between Dec. 19 and Dec. 22, 2018, and that he met with ICRC President Peter Maurer, where they discussed issues related to the humanitarian response in Syria and fields of cooperation.



Sulaiman Maarouf

Place of birth:
Aleppo 1972

A prominent commercial faces of the Syrian regime and Makhlouf family.

Engagements: Through his 'Al-Shahba' Company for Equipment and Electronics, 'Honda' Motor Agency in Syria, and many other companies he owns in partnership with Rami Makhlouf in Aleppo, Marouf provided the Syrian regimes with logistics and imported sniper rifles from South Africa.

Helped Bashar and Asma al-Assad evade international sanctions through his bank accounts in the United Kingdom.

Sanctions: Included in the European Union sanctions since 2012, pushing him to swindling and converting the names of his companies to evade them.

Sulaiman Mahmoud Maarouf (b. 1972, Aleppo) benefited from the fortune his father Mahmoud made in Britain also received Britsh citizenship. Additionally, his father help secure his marriage to the sister of Major General Mohammad Nassif Khairbik, one of the regime security forces' leaders who was close to Hafiz al-Assad and his son Bashar.

Since his return to Syria, Sulaiman worked on establishing several corporations and managed some of them:

- He became an agent for Honda cars in Syria.
- He participated in the establishment of Cham Holding (affiliated with Rami Makhlouf).
- A cofounding partner and president of Al-Shahbaa Media Company.

• A co-founding partner of the Syrian International Islamic Bank (known to be a part of Rami Makhlouf's network of businesses).
• A co-founding partner of the Syrian International Islamic Insurance Company.
• A co-founding partner of the Syrian International Company for Financial Services.
• A co-founding partner of Al-Shahbaa Communications Company.
• He owns a chain of retail stores in several cities in Syria called Digital Stores & Services, selling exclusive brands such as digital cameras and accessories.
• A co-founding partner of Al-Shahbaa for Investment and Tourism.
• A co-founding partner of Al-Shahbaa Limited in UK, a financial consulting company located in London UK.
• A member of the Board of Directors of Cham Printing.
• A co-founding partner of the company Development, specialized in contracting and building.
• A general manager and a co-founding partner in ART FM.
• A co-founding partner of Nasmat al-Jabal.
• Music Box Café in Aleppo.
• Nasmat al-Jabal Restaurant and Resort, in Klelat, Lattakia.
• Participated in Najm Import & Export.
• Islamic Company for brokerage and financial services.
• Owns a chain of restaurants in Britain, advertised as offering Damascene Cuisine, and the majestic Damascene style.

The relationship between Sulaiman Maarouf and Bashar al-Assad goes back to the period when Assad studied ophthalmology in London. Sulaiman expanded his business in Britain at the same time his business expanded in Syria in general and in Aleppo in particular.

He established several companies, in partnership with Ehab Makhlouf, brother of Rami Makhlouf, in which Sulaiman Maarouf acted as a front for those activities.

By 2011, Sulaiman Maarouf had publically owned various companies and investments in Syria, including:

- Al-Shahbaa for equipment and electronics
- Exclusive agent of Japanese Honda cars in Syria
- Information and Media Technology, which offers several media services including Addunia TV network, and Art FM radio station.
- Onyxar JLT, web development: has a business office in Damascus, and investments in Dubai, Ajman, and Doha
- Some of the websites hosted by Onyxar:
- Meats Board - a social networking website.
- Shoko Mako - a new website.
- YaGoal - a sports news website.
- Kids - a website for children between the ages of 6-12.
- Magazines affiliated with Onyxar:
- Dunia al-Ryadha (Sports world)
- Magazine 17 - a magazine for teenagers between the ages of 15-24
- Kids Magazine
- Sabaya (Girls) Magazine
- Al Usbou (The week) Magazine

At the outbreak of the peaceful protests in 2011, Sulaiman Maarouf supported the regime, he used his business bank accounts to serve Bashar al-Assad and his wife Asmaa, and he tried to provide the regime with advances sniper rifles from South Africa, which prompted the European Union to list his name on the sanctions list in 2012, but he managed to get removed from it in 2014, due to lack of evidence. However, the

leaked Panama Documents showed that Sulaiman managed to elude the sanctions and played his designated role as a business front for the regime, where he established new companies and renamed a few of his old ones, in an attempt to hide the business activities he does for the regime, benefiting from his citizenship, and the group of companies he owns in the British Virgin Islands, Dubai, Beirut, and Damascus.

Sources mention that Sulaiman currently lives in the UK, and visits Syria every now and then, also that British papers have spotted an increase in his business activities the past two years, buying several fancy estates in classy neighborhoods in London, in addition to establishing companies in the British Virgin Islands, however, according to the European Court of Appeal, no one has been able to convict him with conclusive evidence that he supported the Assad regime in the repression of civilians.



Samir Anis Hasan

Place of birth:

Hammam Alqarahleh-Lattakia

Manages funds for many senior officials in the Syrian regime and involved in attracting Russian companies to invest in Syria.

Helps the regime avdae international sanctions through many Russian Cubit companies.

Owns factories in the pesticides and glass cleaners sector, and agent for many international brands such as 'Nestle', 'Nokia', 'Nikon' and 'Fuji'.

Through a a private company in the free zone he is involved in the transport of goods and logsitics for the Syrian Regime in addition to facilitating direct marine transport line between Latakia and Novorossiysk port in Russia.

Samir Anis Hasan, was born in Hammam Alqarahleh village in Lattakia, to a poor family. He turned from a former employee of Nestle into a businessman that owns agencies for large international companies in Syria, and is a partner and co-founder of several companies and an exclusive agent for some of them, including:

- Owning the Nestle factory in Syria, the only Nestle factory in Syria before it was burnt down in 2013.
- Al-Amir Telecommunications Company, a commercial representative for Nokia
- He is an agent for Nikon Cameras and Fuji films
- Agent for Sleep Comfort furniture Company
- Deputy Manager of Emaar Al-Sham Real Estate Company and one of its co-founders
- A partner in Syria Kuwait Insurance

- A co-founder and a member of the board of directors of Cham Holding
- A co-founder of Byblos Bank Syria
- A co-founder of ePedia-Sy Digital Contents
- Syrian Company for Medical Care
- Al-Amir Company for the manufacturing of mineral oils
- Al-Amir Group General Trade/Export and Import and Contracting
- Taa'din Al-Sina'at Company
- He owns a company that produces pesticides, glass and furniture cle aners, and air fresheners.
- He occupied the position of Chairman of the Syria-Ireland business council, and currently occupies the position of Chairman of Syria-Russia business council.

Through those companies, Samir Hassan runs money for several entities close to the Syrian regime, including Shalish's and Makhlouf's, especially the import of food materials.

Samir mainly works on attracting Russian companies to invest in several sectors in Syria, including oil, power, agriculture, tourism, and trading, as well as rebuilding city companies.

He also works in facilitating financial transactions for the regime through the Russian Cubit group that includes 158 giant companies, which opened a bank of its own, in addition to opening a company in the free zone, to facilitate shipping goods, and establish a shipping line between Lattakia harbor and Novorossiysk habor in Russia, using ships that are owned by the same group.

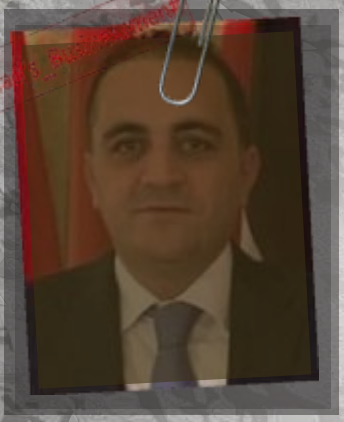
Samir Hasan also works on Russian projects including the expansion of Tartous port and building a new port in Lattakia under the B.O.T system, and improving the Syrian Airlines

company's situation by providing replacement hardware, engines, and providing new and old airplanes.

Russia also acquired several long term economic privileges, through signed agreements with the Syrian regime, the most important deal was concerning oil and gas production and supplying wheat, in addition to tens of trade deals with Russian companies and businessmen.

It is worth mentioning that Nestle, affiliated with Samir Hasan, is producing about 47 tons of baby formula, and other food supplements. Samir also monopolized Nokia products in Syria which he's dominated since 2000 to date.





Wassim Quattan

Place of Birth:
Damascus 1976

Previous chairman of Damascus Chamber of Commerce and owner of many companies that operate for the benefit of Rami Makhlouf, including 'Muruj Al-Yasmeen' Company for tourism premises and restaurants, 'La Rosa' for furniture, 'Hot Bakery' and 'Muruj Al-Sham' group for investment and tourism.

Wassim Anwar Quattan (b. 1976, Damascus) got his college degree in fine arts from Damascus University. Wassim wasn't well known in the business sector until recently, when he emerged as a founding partner in several businesses:

He is the Managing Director and co-founding partner of the Morooj al-Yassmin Company, which plays a large role in investing and managing tourism facilities. Quattan's other interests include:

- Owner of Larossa Furniture
- Owner of Hot Bakery Company
- Owner of Morooj al-Cham for Tourism and Investment
- Managing Director of Adam Trades and Investments
- Director of Noqtat Taqato'
- Manager and founding partner of Quattan & Knaifati Co.

- Manager and founding partner of Perfect House Investments

He also served as President of the Damascus Chamber of Commerce after the former Minister of Internal Trade, Abdullah al-Gharbi, and owner of the Qassioun Mall deal, dissolved the Damascus Countryside Chamber of Commerce, under the pretext of serious irregularities.

Wassim Qattan's first appearance was when he invested in Qasion Mall located in Masaken Barzeh, the deal was valued as high as 1.2 billion Syrian pounds, in addition to 400 million pounds for repairs of certain sections of the mall, while the old investment contract was for 20 million pounds. The company was established on Jul. 10, 2017, and the deal was closed on Jul. 12, 2017, just two days after the establishment of the company was announced.

During the same period, Qattan's name surfaced again when he won the investment contract for the Aljalaa Hotel located in Mezzeh Highway area, also two days after his company Morooj al-Yassmin was established on Mar. 13, 2018.

On Aug. 20, 2018, Damascus Governorate (which holds 51 percent of the shares in Massah Plaza Mall in Malki Av) closed the mall down and handed it over to Wassim Qattan. He offered 1.29 billion Syrian pounds for the mall, although the original contracting company, Hakim Bros Co. (which owns 49 percent of the shares) didn't terminate the contract, and still have 13 years remaining on the contract. According to Ghali Hakim who confirmed that the governorate started the hand over procedures, even breaking into and entering into Hakim's offices in the mall while he was absent, describing it a burglary operation.

Hakim explained that the governorate has been pushing for some time to terminate the partnership contract with Hakim Brothers for Trading and Contracting, pointing out that in 2017 they resorted to Law 106 of 1958 (from the time of the United Arab Republic), and issued Decision Number 742 on Oct. 9, 2017, declaring sector 81 West Abu Rummaneh a public property (acquisition by state), although it's already a property of the state, pointing out that the decision was unanimously approved by the Executive Office of the provincial council.

At the end of December 2018, Wassim Qattan won an investment contract for the famous Yelbuga complex in Damascus for 1.02 billion Syrian pounds. It is worth mentioning that the work on the Yelbuga complex was started over 40 years ago by the Military Housing Foundation and has still not been completed. T he cost so far is over 700 million pounds, 10 times more than the original value set before the construction. This complex is one of the most prominent faces of the administrative and financial corruption in state institutions.

During Qattan's presidency of the Damascus Chamber of Commerce (which did not exceed several months) many Syrian businessmen and investors complained of discrimination against them, especially concerning the classification of their companies by the Damascus Chamber of Commerce. An investor complained that although he completed all the required conditions to get a proper classification for his company size and type, this didn't happen. Employees in the Chamber told him that no one can get higher than level 4 classification for their company without the approval of Wassim Qattan himself. Another company owner (a holding company with a startup capital of 1 billion pounds), spoke of his company being classified as level 4 company (as per Qattan's laws), and while it deserves an excellent classification, for meeting all the requirements for

such classification, such behavior enshrines the corruption in the Damascus Chamber of Commerce.

It is worth mentioning that Wassim Qattan does not have any commercial record history, and does not belong to any of the well-known Damascene trading families. Insiders believe that his sudden appearance is due to his work as an employee in Syriatel (owned by Rami Makhlouf), which explains the quick start of this unknown man. The regime uses such methods, where an unknown person gets funding and huge state-related investment projects, through companies newly launched (a couple of days before unsealing the investment offers.





Nizar Jamil As'ad

Place of Birth:

Ayn Jash, Drikish, Tartus 1948

Major oil merchant in Syria and a prime brokers working for Mohamed Makhlouf.

Owns many companis such as 'Dajajuna', 'Tartus' for Paper Manufacturing, and 'Al-Jameel' farm in additions to his partnership in many companies that operate in Algeria, Emirates.

Engagements: Accused of smuggling goods from on behalf of Bashar and Maher Al-Assad and Rami and Ihab Makhlouf.

Nizar As'ad was born in the village of Ain Gash ،District of Dreikish ،Tartous Governorate ،in 1948 ،to a wealthy family.

After graduating as a civil engineer in the mid-seventies ،Nizar joined his father's construction business and expanded it to include hotel construction and other similar projects. By the end of the 1970s and through the 1980s ،he shifted his business to the oil and gas contracting sector. He worked with international companies such as Entrepose (a leading contracting company in engineering and procurement) to build the first gas plant in Syria.

Together with Ghassan Muhanna ،he founded LEAD Contracting & Trading Ltd. LEAD. Started in Syria ،Lead specialized in oil and gas contracting and petrochemical facilities ،including treatment plants ،power stations ،

electromechanical construction services ،and pipelines ،in addition to large-scale construction and civil engineering projects. As'ad got rich through his relationship with the regime of Hafez al-Assad.

Nizar As'ad worked with foreign companies such as Petrofac ، Brown Root and implemented many infrastructure projects in the oil industry in the 1980s and 1990s. He gained extensive experience that enabled him to expand his business overseas with international companies.

Through the projects and works he implemented and the experience he gained ،Nizar As'ad managed to gain a status that enabled his company to work with major international companies to implement several projects in the region ، especially in Algeria.

He started LEAD LTD and registered it in Jebel Ali ،UAE ،as an offshore to become an international company ،in partnership with other shareholders ،excluding his old partner Ghassan Muhanna.

Soon As'ad became one of the significant providers of technical services to companies. His companies expanded abroad as he carried out contracting for considerable projects in Algeria. His company won the World Finance Award as the best company for undertakings in oil in Syria for 2009.

In addition to his work in the oil field ،Nizar As'ad participated in the Assaad ،Betanjaneh ،and Co to produce cooking oils. Later ،he became co-chairman of the Syrian-Algerian Businessmen Council and a member of the BoD of the Syrian National Committee for the International Chamber of Commerce until 2011.

In 2009 ،he contributed to establishing several projects ، including Sham Holding ،Syria Holding ،United Insurance Company ،and Al Badia Cement Company. He also founded a

chicken produce company Dajajuna and Tartous Paper Industries Company. He even established a farm for original Arabian horses: al-Jameel Farm.

However ʿAs'ad left the country in 2012 and claims he has given up his investments in Cham Holding. As'ad sold his shares in Al Badia Cement Company in 2011. He previously sold the Chicken Project in 2008 in Syria and has no new investment there. As'ad has not occupied any government position. In 2012 ʿhe moved to Lebanon permanently and gave up all his work in Syria.

As'ad holds Canadian citizenship and obtained Lebanese citizenship about 16 hours before the end of the term of Lebanese President Michel Suleiman ʿwith some other significant Syrian businesspeople affiliated with the Syrian regime. His two daughters ʿNada and Mia ʿalso have Lebanese citizenship by a decision of the Lebanese President.



Mohammed Khaled Al-Zubaidi

Date of Birth:
1976

Owns many investment and real estate companies, including 'Al-Zubaidi' for Development, 'Ebdaa', 'Enjaz' and 'Al-Zubaidi-Al-Tawil' for Contracting companies.

He mortgaged about 687 million Syrian pounds in the name of "Ebdaa Investments" company from the Syrian Real Estate Bank in the early 2011 and denied to pay the loans back.

Mohammed Khaled Bassam al-Zubaidi (b. 1976) also known as Khalid al-Zubaidi was an obscure man before he was associated with Nader Kalai, Rami Makhlouf's partner.

That relationship assisted the sudden appearance of Khalid al-Zubaidi about a year ago, as a co-founding partner in several companies and holding the following positions:

- General Manager of the Ibdaa Investments Company
- Manager/Owner of Zubaidi Development
- Manager of Injaz for Investments
- Manager of Ikar for Investments
- General Manager of Alzubaidi & Taweel Contracting Company
- Member of the board of directors and co-founding partner of Z.K Development (Zubaidi & Kalaai)

Most of those companies emerged in the last few years, through which Zubaidi managed to open a huge investment -near the Fairgrounds and Conference Palace- called Grand Town, which will include tourism, residential, commercial, recreational, and an educational city with apartments and shopping malls. This investment is in partnership with the Ministry of Tourism, which explains the lack of a known budget for the project, which was later named Victory City.

Zubaidi is working on a similar city that includes 6,000 houses, near Damascus International Airport. The project plans for 450 houses will be for the middle class, in addition to an initiative aimed at the families of martyrs.

On Sept. 6, 2018, Khaled al-Zubaidi invited the Prime Minister and his accompanying convoy to dinner after the opening of the Damascus International Fair, and he gave the guests a small introduction of the Grand Town project. Many interpreted this step as another aspect of corruption, in which the regime gives major projects to trusted men and economical fronts, while the profits go back into its leaders' pockets.

Moreover, Zubaidi's company, Ibdaa Investments, obtained a loan from the real estate bank, worth 687 million Syrian pounds in early 2011, and declined to repay these loans to the real estate bank, which is one of the hotbeds of money laundering for the regime's men.

In March 2017, a real estate development company with a capital of 50 billion Syrian pounds was established by Nader al-Qalaai, to fill the big void in the investment market after the fleeing of Syrian capitals abroad. This step represented the way roles were allocated by the regime to its men, when Bashar al-Assad gave Nader al-Qalai the power to establish

real estate development companies to fill the vacuum caused by the withdrawal of the real estate companies, and carry out government functions, and run all the large real estate assets owned by the governorates and cities that were damaged, while Zubaidi's company was a branch of Qalai's companies established for Bashar al-Assad and Rami Makhlouf.





Khalid Naser Kaddour

Place of birth:
Damascus 1970

Manages the commercial groups and the plastic factories of Maher Al-Assad, and runs a company which is specializes in external tenders for the Syrian army.

Partner and founder of several companies, including 'Al-Shahba Telecommunicatio'", 'Aabar' for Investments, and 'Tatweer' Contracting Companies.

Engagements: Involved in supporting the sectarian militias that were set under the name of 'People's Committees', which later turned into "National Defense" militias.

Sanctions: Subject to sanctions by UK government and EU as a result of his felonious activities and his support to the sectarian militias that committed crimes and violations against civilians in Syria.

Khalid Naser Kaddour (b. 1970, Damascus) holds an engineering degree. His family is originally from Aleppo city, and he is the son of Naser Kaddour the former Minister of Foreign Affairs, and is the son-in-law of businessman Maizar Nizam al-Dein.

Kaddour appeared as a co-founding partner of several companies including:

- Al-Shahba Communications
- Abaar Investments
- Saif al-Cham Machinery Company
- Tatweer (Development) Company for Contracting

It's worth mentioning that Al-Shahba Company was established in 2011 in partnership with Mohammad Hamsho and Sulaiman Maarouf. The three are also partners in the Tatweer Company.

Khalid Kaddour is one of the men who manage Maher al-Assad's businesses, and was responsible for managing the commercial groups and plastic plants owned by Maher al-Assad. He also ran a company specialized in commercial tenders related to the Syrian Arab Army, and played the role of the economic ambassador of Maher al-Assad abroad.

According to sources, Kaddour is one of the most prominent Syrian figures who is active in money laundering operations resulting from trading in Iraqi oil for the benefit of the regime. He was one of those implicated in the money laundering case of Al-Mawarid Bank in Lebanon, through which the money of Saddam Hussein was laundered, and smuggled out a year and a half before the fall of the Iraqi regime. This operation was coordinated between Mirza Nizam, Qusai Saddam Hussein, and Maher al-Assad. The money laundering and smuggling operation was authorized by Maher al-Assad who got the bigger percentage, and executed by Rustom Ghazaleh, who covered up the crime and pressure anyone tries to expose the operation. Lebanese figures helped to smuggle the money outside of Lebanon.

Rana Qulailat -the former manager of Al-Madina Bank in Lebanon spoke of the relationship between Khalid Kaddour and Maher al-Assad and their involvement in the money laundering operations done through Al-Madina and Al-Mawarid banks in Lebanon, and she confirmed Khalid Kaddour's withdrawal of more than 50 million dollars for Maher al-Assad either in cash or bank deeds.

It is noteworthy that Khaled Kaddour participated with Mohamed Hamsho, Rami Makhlouf, and Ayman Jaber in supporting the sectarian militias established under the name of People's Committees, which later turned into National

Defense militias. Kaddour also helped Hamsho infiltrate the Free Syrian Army's (FSA) ranks and troops in Damascus suburbs, and surrendering several members and leaders to the regime's security forces, and helped in ambushing FSA fighters.

Due to his prohibited activities, and his support for the crimes and violations of sectarian militias, Britain and the EU sanctioned businessman Khaled Kaddour, however the European Court of Appeal in Luxembourg later issued a decision to lift the penalties for Khaled Kaddour, Mohamed Hamsho, Ayman Jaber and Suleiman Maarouf.



Yasir Aziz Abbas

Place of Birth:
Tartus 1978

Provided logistic support for the Syrian regime, in the energy, fuel and arms sectors, and undertook an open role in facilitating oil imports from Iran.

Manages several companies, including 'Al-Malek Al-Shab', 'Al Tafawuk', 'Qadra' trading, and 'Al-Bajaa' for commercial services.

Engagements: Involved in shipping Iranian military equipment to the Syrian Air Force Intelligence Directorate and the Syrian Army.

Sanctions: Included in sanctions imposed by the US Treasury, but he managed to find ways around by setting up companies for his siblings instead.

Yasir Aziz Abbas (born in Tartous) did not have a presence in the commercial forums before 2011; however, the sanctions that the regime faced made Abbas one of the most prominent shadow businessmen close to Assad's circle. The regime took advantage of Abbas, and other businessmen, to create commercial fronts to elude those sanctions, which gave Abbas the important role of managing and partnering in several companies, including:

- Al-Malik Al-Shab, which he owns 50 percent of its shares, along with Khalid Taqi
- Tafawok Projects Co.
- Qudra Trading Co.
- Swan for Trading Services
- Seven Steps Consultancy
- Top Business Co.

Yasir Abbas spoke of his new role in his interview with a French journalist, Annie Rishiri, in which he said:

«In regards to the traditional elite, they hope to mitigate the consequences of the sanctions imposed on them by ceasing their support for the Syrian regime. on the other hand, the rise of the new elite -which supports the regime in Damascus- may represent a barrier to the traditional elite reaching its goals."

Through the mentioned companies, Yasir Abbas offered logistical support to the regime, especially in the energy, fuel, and arms deals sectors, where he secured -starting 2017- all the Ministry of Petroleum and Mineral Resources' contracts related to the importing of oil, and became one of the most prominent godfathers of the commercial exchanges with influential figures in Syria. On one occasion, he brokered an Iranian loan for the Syrian government, which was used to secure fuel, Yasir stresses that, «Before the war, I used to run a company that employed about 4,000 employees, but now, I have entered into competition with the big trade families close to Assad's circle», adding, «Socially, I became closer to these families, but without becoming visible.»

It is worth noting that Yasser Abbas was charged in 2016 along with Khaled Taqi with smuggling 24,108 tons of natural gas to Syria, through the Al-Malik Al-Shab Company, between 2013 and 2014. Published papers pointed out that these operations were done without any customs paperwork, nor any intention to file any paperwork with the customs, which cost the General Manager of Customs Services, Majdi Hakima, his job.

A committee composed of the Central Authority for Oversight and Inspection called for the issuance of a decision stipulating the seizure of movable and immovable property of the owners

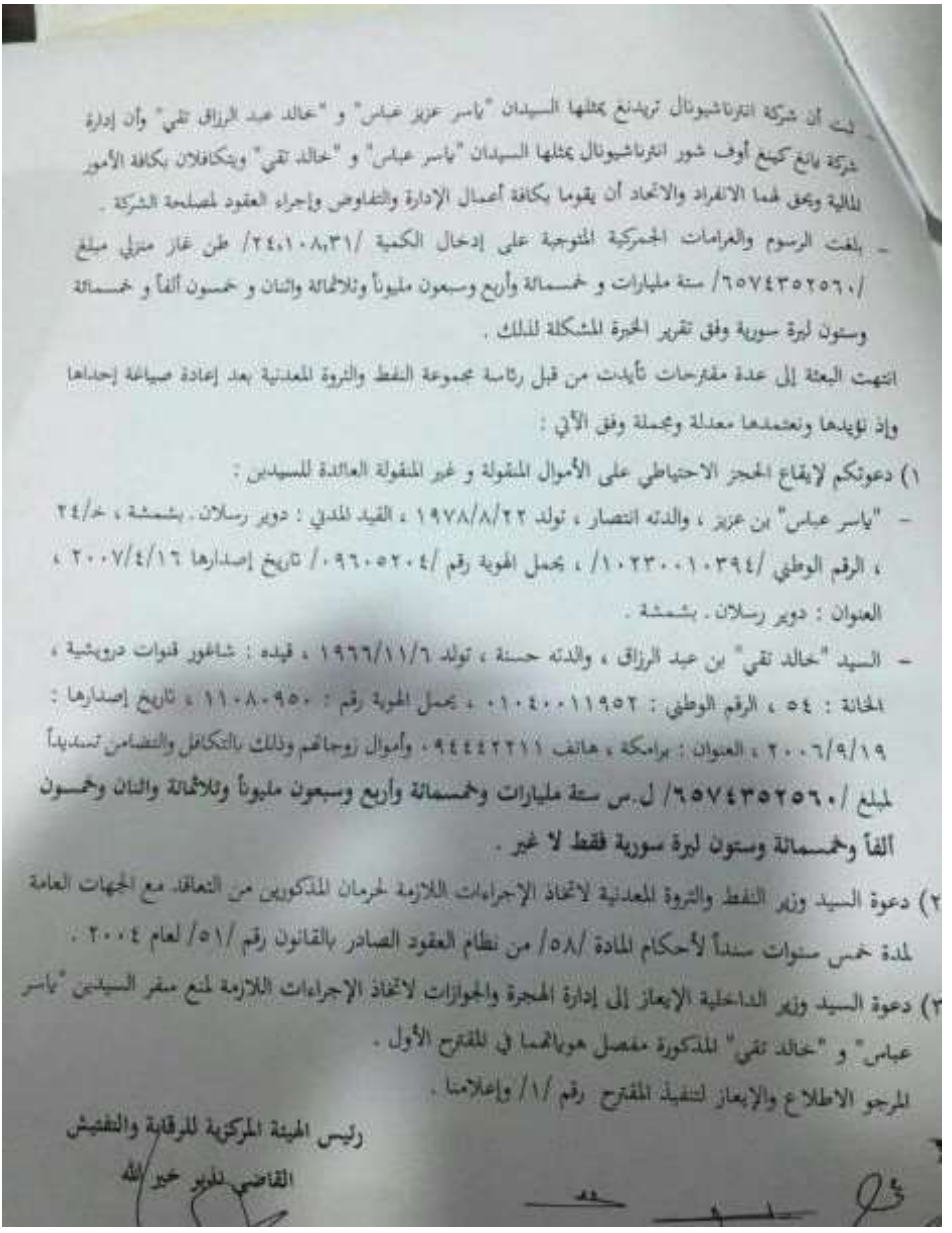
and their wives of the aforementioned company and travel bans, and fines and fees resulting from the smuggling process amounting to 6.574 billion Syrian pounds.

However, the file was soon closed, and a forged document proved that Al-Malik Al-Shab purchased the natural gas on behalf of Mahruqat Company - an official Syrian fuel distribution company- and under the supervision of customs, and a simple replacement of the General Director of Customs, was sufficient, and the Central Supervision and Inspection Authority was forced to deny taking any legal action against the company and its owners, burying the case completely, enabling Yasir Abbas to acquire the oil import contracts of the Ministry of Oil and Mineral Resources since 2017.

Abbas's activities didn't stop at providing the regime with fuel, but he played a direct role in the import of oil, and the participation in shipping goods and military equipment, from Iran to Syria, for the Air Defense Intelligence Administration, and Army logistics office. This prompted the US Treasury to place Yasir Abbas on the sanctions lists.

To circumvent those sanctions, Abbas started establishing companies for his brothers in his stead. In February 2019, the Ministry of Internal Trade and Consumer Protection approved the establishment of the A'mal Limited Company in the city of Damascus, to work in the field of contracting, oil, and the distribution of oil digging machinery, storage, oil refining, and importing equipment and machinery needed in oil digging. The company is owned by Mohammad Shihada Dukan, who holds 60 percent of its shares, and Bassel Aziz Abbas, who holds the other 40 percent of the shares. As well as establishing two other companies in the name of Ali Aziz Abbas, Yasir's brother.

The companies are called Albahri, and the Olympic Champion, noting that Ali Abbas is a Syrian kickboxing champion.



- ... أن شركة انترناشيونال تريدنغ يمثلها السيدان "ياسر عزيز عباس" و "خالد عبد الرزاق تقي" وأن إدارة شركة بانغ كينغ أوف شور انترناشيونال يمثلها السيدان "ياسر عباس" و "خالد تقي" ويتكافلان بكافة الأمور المالية ويحق لهما الانفراد والاتحاد أن يقوما بكافة أعمال الإدارة والتفاوض وإجراء العقود لمصلحة الشركة .
- بلغت الرسوم والغرامات الجمركية المتوجبة على إدخال الكمية /٢٤،١٠٨،٣١/ طن غاز منزلي مبلغ /٦٥٧٤٣٥٢٥٦٠/ ستة مليارات و خمسمائة وأربع وسبعون مليوناً وثلاثمائة واثنان و خمسون ألفاً و خمسمائة وستون ليرة سورية وفق تقرير الخبرة المشكلة لذلك .

انتهت اللجنة إلى عدة مقترحات تأيدت من قبل رئاسة مجموعة النفط والثروة المعدنية بعد إعادة صياغة إحداها وإذ نؤيدها ونعتمدها معدلة ومجملة وفق الآتي :

١) دعوتكم لإيقاع الحجز الاحتياطي على الأموال المنقولة و غير المنقولة العائدة للسيدين :

- "ياسر عباس" بن عزيز ، والدته انتصار ، تولد ١٩٧٨/٨/٢٢ ، القيد المدني : دوير رسلان . بشمشة ، خ/٢٤ ، الرقم الوطني /١٠٢٣٠٠١٠٣٩٤/ ، بحمل الهوية رقم /٠٩٦٠٥٢٠٤/ تاريخ إصدارها ٢٠٠٧/٤/١٦ ، العنوان : دوير رسلان . بشمشة .
- السيد "خالد تقي" بن عبد الرزاق ، والدته حسنة ، تولد ١٩٦٦/١١/٦ ، قيده : شاغور قنوات درويشية ، المخانة : ٥٤ ، الرقم الوطني : ٠١٠٤٠٠١١٩٥٢ ، يحمل الهوية رقم : ١١٠٨٠٩٥٠ ، تاريخ إصدارها : ٢٠٠٦/٩/١٩ ، العنوان : برامكة ، هاتف ٩٤٤٤٢٢١١ . وأموال زوجاتهم وذلك بالتكافل والتضامن تسديداً لمبلغ /٦٥٧٤٣٥٢٥٦٠/ ل.س ستة مليارات وخمسمائة وأربع وسبعون مليوناً وثلاثمائة واثنان وخمسون ألفاً وخمسمائة وستون ليرة سورية فقط لا غير .

٢) دعوة السيد وزير النفط والثروة المعدنية لاتخاذ الإجراءات اللازمة لحرمان المذكورين من التعاقد مع الجهات العامة لمدة خمس سنوات سنداً لأحكام المادة /٥٨/ من نظام العقود الصادر بالقانون رقم /٥١/ لعام ٢٠٠٤ .

٣) دعوة السيد وزير الداخلية الإيعاز إلى إدارة الهجرة والجوازات لاتخاذ الإجراءات اللازمة لمنع سفر السيدين "ياسر عباس" و "خالد تقي" المذكورة مفصل هوياتهما في المقترح الأول .

للرجو الاطلاع والإيعاز لتنفيذ المقترح رقم /١/ وإعلامنا .

رئيس الهيئة المركزية للرقابة والتفتيش

القاضي نادر خير الله



Ali Wahib Marhi

Occupation: Son of Waheeb Kamel Mari'i, a prominient iron tradesman in Syria, and the largest businessman in Tartus Governorate.

Enjoys official support in Syria in return for helping the regime evade international sanctions.

Owns many companies, inclusding 'Al-Wahib Economy Group', 'Al-Wahib and Al-Lewis LLC', and 'Al-Raed' for Food Industries.

Engagements: Participated in the organization and financing of mercenaries (shabiha).

Helps Assad regime producing explosive barrels in his Iron factory in Tartus.

Ali Wahib Marhi is the son of businessman Wahib Kamel Marhi, one of the most prominent iron traders in Syria and the biggest businessman in Tartous.

Upon Wahib's passing away in 2017, his son Ali inherited a large group of companies and large projects, in addition to inheriting the regime's support to form a commercial front, with the intention of eluding international sanctions. Ali became the owner and co-founder of several companies, including:

- Al-Wahaib Economic Group
- Al-Wahaib and Al-Wais Limited
- M.A.B Import and Export Co.
- M.A.B Contracting
- Roshana Co.
- Al-Wahib Shipping

- Al-Borouj Trading Co.
- Al-Raed for food industries, and agriculture equipment export, the biggest company in Syria for packing and sorting fruits and vegetables.
- Al-Wahib, institutions in the Syrian coastal area, including an affiliated maritime transport fleet.

He is also a member of the board of directors of Fransabank Syria and owns, as well as his iron trades, several investments in the fruits, building materials, and tourism sectors, and owns two tourist projects in the coastal region. At the same time he has occupied the position of Vice President of Tartus Chamber of Commerce since 2017, which he took over from his father, who occupied the position since the establishment of the Tartus Chamber of Commerce.

Marhi's wealth comes from his father's inheritance, which he built through smuggling iron into Syria in the ‹80s, in partnerships with Fawaz, Monzer al-Assad, and Asef Shawkat, in addition to being accused of drug trafficking. He turned from just a mechanic, into a major iron and construction materials trader in Syria.

Sources mention a relationship between Wahib (the father) and Rif'at al-Assad before 1984, however he turned on him and supported Hafiz al-Assad, which prompted the President to grant him the right to monopolize iron importing from Ukraine. Sources also talk about his relationship through marriage with the Assad and Shalish families, and also with the son of the Major General Nasser Dib, deputy head of the political security department.

Wahib (Ali's father) until his demise in 2017, had a prominent role supporting the regime's operations through his ground and marine fleet, providing food materials and assembling explosive barrels in his iron factory in Tartus. He became an actual accomplice in the regime's crimes against civilians in Syria.

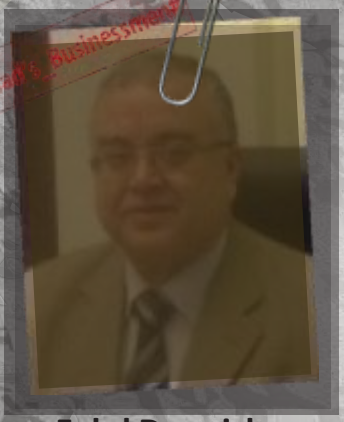
Wahib also contributed to the assembly of armed militias and funded them personally, and oversaw the organizing of pro-regime marches. Those heinous crimes he committed for the regime, helped him in gathering a wealth of about 5 billion dollars.

Ali is working in the same field as his father and is a front for the regime to evade sanctions, and one of the contributors that funds the regime's crimes against civilians.





Wahib Kamel Marhi



Fahd Darwish

Occupation: Prominent representative of the Iranian companies in Syria.

Owns several companies, including 'Armada' for Trading and Contracting, which represents the interests of the Iranian company 'Saba Automobiles', in addition to possessing 'Al-Baraka Pharmaceutical Company', 'Al-Fahad' Trading, and 'Fahad Darwish Group' for Trading and Contracting.

Engagements: supplied regime forces with medical provisions and provided military hospitals with logistics.

Fahd Mahmoud Darwish is one of the businessmen who form an economic front for Iranian companies in Syria. He works as an agent for them in the Syrian market and is the head of the Higher Committee for Investors in the Free Zones, and owns several companies, most notably:

- Syrian Armada for Trade and Contracting
- Al-Baraka Pharmaceutical
- Al-Fahd Trading
- Fahd Darwish Group for Trading and Contracting

Fahd Darwish's first big appearance in the Syrian trade scene was in 2010 when the director of the General Consumption Organization, Mohsen Abdulkareem, gave him the Abbasids' complex to invest in, however, the millions he spent preparing the complex got lost as a result of the uprising in 2011.

In the wake of the growth of the trade relationships with Iran, Fahd Darwish stood out through his Armada Company, which became an agent for the Saipa Auto Company, to manufacture and assemble Saipa cars in Syria. He also imported 3,000 tractors from Iran through the Iranian Tractor Manufacturing Company, while the Al-Baraka Pharmaceutical Company imported large and various quantities of Iranian medicines, including cancer treatment medicines, knowing that Al-Baraka is an extension of the Iranian company Al-Baraka Holding.

Darwish, and through the Al-Baraka Company, managed to acquire pieces of medical equipment, and materials, for the regime's military forces and supporting the military hospitals.

In 2018, major Iranian companies represented by the Iranian Al-Baraka Pharmaceutical Company, approved a project to establish pharmaceutical joint laboratories with the Syrian government, through cooperation and coordination with the Ministry of Health, the Ministry of Industry, and the General Corporation for Chemical Industries. Fahd Darwish was the godfather of this partnership.

Fahd Darwish also obtained a contract to supply 2,700 TV screens to Syronics, with a contract amounting to 250 million Syrian pounds. It turned out that those screens will be imported from Iran, which has no significant reputation in the electronics field.

Sources indicate that Darwish is the economic arm of Iran in Syria, where he employs his companies to circumvent the sanctions imposed on the two countries, and at the same time works to establish an Iranian lobby within the Syrian business community, to help Iran move smoothly in the Syrian market, and granting them preference in trade transactions,

knowing that the investments belonging to Darwish do not have significant capital, and according to a Syrian website, al-Iqtissadi, website, Darwish owns 50 percent of Armada, at a value of 2.5 million pounds or approximately 5,000 dollars and also owns 74 percent of the Al-Baraka Pharmaceutical Company, valued at 740,000 Syrian pounds or about 1,500 dollars only. This confirms Darwish's affiliation with Iran, especially since all his economic activities are done with Iranian companies, and the low capital confirms that his companies are nothing more than commercial fronts for Iranian economic activities in Syria, taking into consideration that the price of one tractor he is selling, is more than the capital of his companies altogether.

It is worth mentioning that the Ministry of Internal Trading in the Syrian Regime government issued a decision on May 5, 2019, appointing Omran Shaaban Mohammad as President of the Syrian-Iranian Chamber of Trade on behalf of the Syrian side and appointing Fahd Darwish as vice-president of the chamber, knowing that most of its members are businessmen that Iran uses to serve its economic interests in Syria.



ورية العربية السورية
ة الداخلية وحماية المستهلك

القرار رقم /١٢٥٣/
وزير التجارة الداخلية وحماية المستهلك
بناءً على المرسوم رقم /٣٦٠/ تاريخ ٢٠١٨/١١/٢٦
وعلى المرسوم التشريعي رقم /٤٦/ تاريخ ٢٠١٢/٦/٢٣
وعلى أحكام القانون رقم /١٣١/ لعام ١٩٥٩ بشأن تنظيم الغرف التجارية
ى قرار تصديق النظام الداخلي للغرفة التجارية السورية – الإيرانية المشتركة رقم / ٨٤٥/ تاريخ ٢٠١٩/٣/٢٤
وعلى كتاب اتحاد غرف التجارة السورية رقم / ٣/٣٧٩ تاريخ ٢٠١٩/٣/٤
يقرر ما يلي:

١- يسمى السادة التالية أسماؤهم أعضاء في مجلس إدارة الغرفة التجارية السورية – الإيرانية المشتركة في ال
العربية السورية (عن الجانب السوري).

١- عمران شعبان محمد	رئيس الغرفة
٢- فهد درويش	نائب رئيس الغرفة
٣- ناهد مرتضى	عضو مجلس إدارة الغرفة
٤- شايش عبد الرزاق العويشي	عضو مجلس إدارة الغرفة
٥- مصان النحاس	عضو مجلس إدارة الغرفة
٦- حسين راغب	عضو مجلس إدارة الغرفة
٧- سامي تحسين الخطيب	عضو مجلس إدارة الغرفة
٨- عبد الله ناطور	عضو مجلس إدارة الغرفة
٩- حسن باشمكي	عضو مجلس إدارة الغرفة

٢- يتولى أعضاء مجلس الإدارة انتخاب أميناً سراً للغرفة و خازناً ومقرراً لها.
٣- يبلغ هذا القرار من يلزم لتنفيذه.
دمشق في ٢٩/ ٨ / ١٤٤٠ هـ الموافق لـ ٥ /٥/ ٢٠١٩ م

التجارة الداخلية وحماية ا
الدكتور عاطف النداف



Nabil Toumeh

Place of Birth:

Damascus 1957

A pioneer conomic façade of the Syrian regime.

Owns a number of companies, including 'Hawaii' for Decoration and Furniture, 'Al Sharq', 'Tohme Constructions', and 'Lynn' for Media Production and Distribution, through wich he helps the regime evade international sanctions and funds pro-regime 'Addounia' TV channel.

Engagements: Provided the security services with logistics and hardware through his 'Al-Sharq' Information Technology firm.

Nabil Toumeh (b. 1957, Damascus) splits his time between the practical scientific and economic fronts of the regime. He obtained his doctorate in Mechanical Engineering from Odessa University and a doctorate degree with honors in humanities and world culture from the Italian St. Vedis University, he also holds a diploma in intellectual engineering from Technical University in Germany.

He also received several honorary medals, including:

- Legion of Honor from the Milian and Monza in Italy
- The Golden Legion from the Armenian Embassy in Syria
- A certificate of recognition from the Armenian Ministry of Foreign Affairs
- The UNESCO reward for Peace (Jean Rouche) in 2007

- The Pink Cross Foulard from the Vatican, in the presence of Pope Benedict XVI in 2008
- The International Certificate of Excellence by the Inter-Parliamentary Union in 2016
- The Certificate of Honor from the Arab Union for Veterans and War Victims members
- Membership of the Arab Writers Union and the Federation of Arab Journalists

He is also a member of several civil and intellectual committees, including:

- Damascus Friends
- Syrian Computer Society
- Syrian Public Relations Association
- Syrian Geographic Society
- A sponsor of the Dr. Nabil Toumeh Arab Creativity Award
- A member of the People's Assembly in the second legislative roundbetween2016-2020.

Although he held all the above titles, this did not prevent him from aiding the regime in their oppression and war crimes. He kept appearing on TV and media, justifying the regime's violations, and at the same time, he utilized his companies to serve the regime and helped it avoiding sanctions. The most prominent companies affiliated with Toumeh International Group are:

- Hawaii Decor and Furniture (Est. 1999)
- Alsharq Company for Engineering and Contracting
- Toumeh Construction Company (Est. 1995)
- Alsharq for IT (Est. 1996)
- Leen Art Production (Est. 1999)
- Alsharq Art Production

- Dar Alsharq (Orient publishing house) for printing and distribution (Est. 2002)
- Alsharq Cleaning services (Est. 2016)
- Toumeh Foods (Est. 2016)
- Zaman Almajd Restaurant (Est. 2004)
- Almoheet International
- Toumeh Cleaning Products
- Toumeh Pharma
- Azmenah Weekly Magazine
- The Arabic Critique Magazine
- Fairs and Markets Magazine

He is also one of the funding contributors to the pro-regime Addunia TV channel. He also provided the security service divisions with computer hardware through suspicious deals won by his companies, which it later turned out were arranged with the encouragement of Maher al-Assad, to whom Nabil Toumeh is a commercial front, and helps to launder his money.

Sources indicate that Toumeh is pursuing pro-revolution artists, through his art production companies, and pressuring them to return to supporting the Syrian regime, and in exchange for those efforts; the regime grants Toumeh Group priority in tenders and transactions.

In 2018, Toumeh partnered with another businessman, Haitham Joud, in two projects, Damascus Towers, and Movenpick. Prime Minister Imad Khamis visited the location of those projects accompanied by several ministers and assured Toumeh that the government is ready to provide all the facilities needed by the two projects.

In addition to using his art projects, and companies to serve the regime's agenda, Nabil Toumeh used his background in journalism to write 54 articles serving the regime's propaganda

on the People's Assembly's website, along with organizing symposiums, lectures, meetings, and artwork.



Mohammad Anas Talas

Place of Birth:

Damascus 1971

Prominent Damascene businessmen who supports the Syrian regime's campaign of terror, and enjoys strong ties with figures close to the regime, such as Muhammad Hamsho and Rami Makhlouf.

Owns a number of companies, including 'Talas Group' and 'Toledo' for canned food manufacturing, in addition 'Mirza' investment compnay

Engagements: Supplies Assad forces with canned food produced by his companies.

Sanctions: Subject to European Eunion sanctions since 2019.

Mohammad Anas Talas (b. 1971, Damascus) is the son of Omar Talas, and one of the most prominent pro-regime businessmen in Damascus. He has a tight relationship with several figures close to the regime like Mohammad Hamsho and Rami Makhlouf. He owns several companies that aid the regime.

Talas Group (Est. 1993) - import, export, and production of canned foods. The group launched the brand name Tolido, which is specialized in a wide range of products including black and green tea, canned tuna, rice, and canned legumes. The brand is sold in several countries, like Egypt, Jordan, and Iraq, and is expanding its activities into Russia, Europe, Africa, and North America.

He is also a partner in Mirza Company, which is responsible for investing in four buildings in the Marota City project, with an estimated investment value of 23 billion Syrian Pounds, along with Damascus Cham Holding, headed by Adel Alolabi, Governor of Damascus. While Talas Group owns 25 percent of the Mirza Company, Anas Talas owns 15 percent of the same company, which has an estimated capital of 52 million dollars.

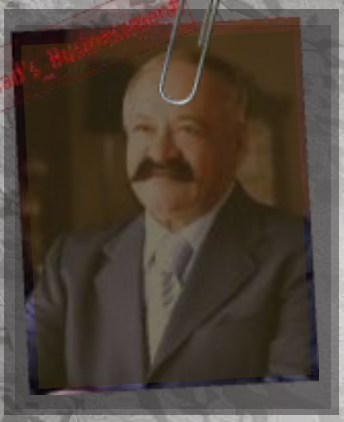
The start of Talas Group coincided with the return of Bashar al-Assad to Syria, from his study of medicine, in 1994, where he started associating himself with businessmen and big companies, converting them into a commercial front working for him. Talas Group has grown very fast, and expanded in several countries, with the facilitation of the Syrian regime.

In early 2019, the EU announced sanctions against a list of several pro-regime businessmen, including Anas Talas, which prompted him to condemn the decision and consider it a great injustice, which has fallen on an entire country.

It is worth mentioning that the Toledo brand -owned by Talas Group- is supporting the regime's army operations, providing canned foods to its soldiers, and the affiliated militias. This prompted the regime to allow Anas Talas to enter the Marota City project, which is being built on top of the ruins of hundreds of houses seized by the regime after displacing the original owners, especially in the area behind Al-Razi Hospital in the Mezzeh neighborhood in Damascus.



Talas with Muayad Talas, General Manager of Jordan branch, and Raafat Dardouna, Syria's Sales Manager



Salim Girgis Alton

Place of Birth:
Venezuela

Owns a large commercial network invloved in cement, construction import and export pledges, including 'Zaina' trading, and 'Altoun' Real Estate Development and Investment, in addition to being the agent of the Korean Company 'Hyundai'.

Engagements: Supplies the regime forces and its mercenaries with hundreds of vehicles in support of its aggression campaign commiting horrific massacres against civilians.

Sanctions: Subject to European Union sanctions in 2012, but was removed from the sanctions list six months later

Samir Alton, is one of the pro-regime businessmen, along with his children Sakhr, Zaina, Alton, and Tala, who support the regime's violations to suppress the Syrian people, through the trade empire they own, which includes many companies, most notably:

- Alton Institution for Development and Real Estate Investment
- Alton Land and Marine Services
- Alton Contracting LLC
- Mediterranean Cement
- Alkotra Construction and Trade

All the above companies are affiliated with Salim Alton.

In addition to:

• Zeina Trading Company, the authorized exclusive agent of Korean car manufacturer Hyundai
• Sama Syria
• Ugarit Educational Company, affiliated with his son Sakhr, who is also a partner in Alfajr Company affiliated with Rami Makhlouf, and in Cham Holding, in addition to being President of the Syrian-Argentinean Business Council.

Also, Alton Alton, Sakhr's brother, is working for the regime through his own companies, Alton and Co. Transportation, Alton Social Services, in addition to their sister Zeina Alton, the General Manager of Zeina Company for Heavy and Light Equipment, and Zeina & Tala Alton Food Company in partnership with Tala Salim Alton.

Samil Alton has built his Empire by working in major economic sectors in Syria, like cement, construction, import, and export, especially coffee, tea, and cars, before his children continued what he started two decades ago. The regime started handing Salim big contracts through the Military Housing Establishment, which was through the past decades, the sole entity in charge of the public construction projects in Syria, headed by Ryadh Shaaleesh, Hafiz al-Assad's relative.

As a result of the services he offered to the regime, Salim Alton was listed on the EU sanctions lists in mid-2012, specifically for his financial support (with foreign currencies), and providing oil derivatives through his companies. The EU also listed Salim's assistant Youssef Klaizeh on their sanctions lists, for providing the regime with food, in collaboration with the General Petroleum Corporation. However, those sanctions didn't last

for long, and the EU removed Salim's name from their list six months later.

Sources indicate that Salim Alton was complicit in smuggling oil for the regime even before 2011. Al-Mada (an Iraqi newspaper) listed Salim's name on a list of Syrian businessmen who were allocated millions of barrels of Iraqi oil in 2003. The list mentioned that Alton was given about 3.5 million barrels a day.

Through his partnership with Rami Makhlouf, Salim's son, Sakhr, works to provide a commercial front to help Makhlouf elude sanctions. He contracted the Emirati Arabtec Holding Company, to build the Yassmin Rotana Hotel on the Mezzeh Highway, in front of the UNRWA headquarters. After the building operations were completed, Alfajr -owned by Sakhr Alton- refused to pay Arabtec's dues, which put the company in a bad situation with the banks it took loans from.

To elude sanctions, Sakhar Alton and his sister received Lebanese citizenship in 2014, along with other pro-regime businessmen, who also received Lebanese citizenship.

It is worth mentioning that the regime blocked Sakhr and Zaina Alton's access to their funds on previous occasions, for shady deals and evading billion of pounds of tax. However, Rami Makhlouf helped to remove the block, in return for the services they provided to the regime, which includes gifting hundreds of Hyundai cars to regime officers and enforcers, to facilitate their transportation while committing violations against civilians.



Saker Alton



Zina Alton



Mohammad Labib Ikhwan

Place of Birth:
Homs

Chariman of Homus Chamber of Industry.

Belongs to well known business household Homs.

Owns 'Gardenia' Real Estate and tourism company and 'Al-Matien' for plastic pipes and cement, in addition to 14 other companis which he employs in assissting the regime's campaign of terror.

Engagements: Works closely with the commander of the third army corps and the head of the Security and Military Committee in General Hassan Mohamed to support the regimes security forces in Homs.

Mohammad Labib Abdelmatin Ikhwan holds a bachelor's degree in Business Administration from Rochville University in the United States. He is a member of one of the most prominent business families in the city of Homs and the heir of its trade and industrial business in the city.

He is active in the production of plastic bags, and plastic sewage pipes, insulation plates for buildings, and industrial hardware insulation plates, white and colored granules and plastic chips, in addition to having broad activities in the field of real estate, through Gardenia Company for Tourism and Real Estate Investments, which he established in 2005, in Homs.

He an owner and partner in several companies, including:

- Cham Holding affiliated with Rami Makhlouf
- Gardenia Company for Tourism and Real Estate Investments

- al-Baraka Bank Syria

Additonally, Ikhwan is affliate with a number of other organisations, including:

- He heads the boards of 16 other companies
- The head of the Homs Chamber of Industry and Vice President of the Federation of Syrian Chambers of Industry
- A member of the Arabic Federation of Chemical and Petrochemical Industries
- A member of the board of directors of Hassia Industrial city
- A member of the Syrian Exporters Union
- A member of the board of directors of the Syrian-Chinese Business Council
- A member of the board of directors of the Syrian Enterprise and Business Centre
- A member of the Syrian Business Forum
- A founding partner of Almateen for plastic pipes, and cement bags
- A member of the board of trustees of al-Sham Private University

Ikhwan participated, with Mohammad Murtada al-Dandashi in establishing Gardenia Company for Tourism and Real Estate Investments in 2005. The company launched the Gardenia Tourist Compound, which was the biggest real estate and tourism project in 2009, with the help of Mohammad Iyad Ghazal, former governor of Homs and a close friend of Bashar al-Assad.

With the start of the uprisings in 2011, Ikhwan put his companies and positions at the service of the regime, who made him President of the Homs Chamber of Industry, a position he continues to hold. Through the Chamber, he managed to

gather Homs business and industry men, moved them to Hassia's industrial city, and convinced them not to get involved in the systematic destruction and sabotage of their city, and pay attention to their interests. The regime rewarded him by granting his company, Almateen, permission to expand, and a guaranteed him a share of the internal and external market.

Ikhwan is putting in efforts to help the Syrian regime get sanctions lifted, and to be rehabilitated. In early 2019, Ikhwan visited the UAE accompanied by Mohamed Hamsho, Samer Aldebs, and other pro-regime businessmen.

On Jun. 25, 2019, Ikhwan was elected as a member of the Syrian-Chinese Business Council, for the 2019 term, where Samer Aldebs, President of the Damascus Chamber of Industry, serves as the president of the council.

It is worth mentioning that Ikhwan cooperates closely with the leader of the Third Corps and the head of the Military and Security Committee in Homs, the criminal Major General Hasan Mohammad, and through him, provides support to the families of the regime's dead and wounded soldiers.



Mohammad Labib Ikhwan among several regime officials visiting Almateen Group





Anas Saifi

Place of birth:
Damascus

A partner of Rami Makhlouf and Mohamed Hamsho in the field of metal trading and manufacturing.

Owns 'Stilco' steel rolling company, 'Seral' for Aluminum productions, 'Adeer' for Insurance and 'Anas Sayfi and Partners' group which specializes in pipes' production.

Engagements: Major suppliwer and supporter of the regime's aggression campagin against the Syrian people.

Anas bin Mohamed Hosni Saifi is one of the most prominent industrialists in the city of Damascus. He works mainly in the field of iron and aluminium rolling, and he is a partner and manager in several companies, the most important of which are:

- Steelco (an iron rolling company, a private joint-stock company for iron rolling, founded in 2008)
- Syral Aluminium
- Adair Insurance Company
- Biotat Commercial Company
- Ta'adin Industries Company (a mining company)
- Iron Company (an iron rolling company)
- He is a member of the board of directors and a founding partner of the Syrian Group for Industry and Trade

• A founding partner of Anas Saifi & Company, which specializes in the production of black pipes, and pipes used in metal furniture and plumbing
• He is a member of the board of directors of the Syrian-Chinese Business Council

Saifi is one of the shadow partners of Rami Makhlouf, and Mohamed Hamsho, especially in the field of metal production and trading. He is also a partner in Cham Holding, with Rami Makhlouf, and a member of the board of directors of Alfajr, joint-stock company (the company that contracted with Arabtec Holding in the UAE to build the Yassmin Rotana Hotel on the al-Mazzah highway).

Saifi is supporting the regime in all its crimes, along with Mohamed Hamsho, Rami Makhlouf, and others. The website Al-Ittihad Press, listed Saifi's name, along with other famous pro-regime businessmen.

It's worth mentioning that the Syrian cabinet established the Syrian Council for Metals and Steel with Resolution No. 3592 of 2015, and appointed Mohamed Hamsho as its chairman, and Saifi as secretary, which enabled him to continue providing support to the regime and their horrific crimes and violations against Syrian civilians



Hashim Anwar Al-Aqqad

Place of birth:
Damascus 1961

Runs a commercial network in Iraq, Syria and Lebanon, through which he is involved in money laundering for the Syrian regime.

Owns 'Anwar Aqad Sons Group' (AASG) , which comprises more than 14 companies in many sectors, including fabrics, pasta,sugar and oil.

Provided oil derivatives and military equipment for the Syrian regime, and dunded mercenary groups in Damascus and its countryside.

Sanctions: The European Union imposed sanctions against his brother "Samer" for harnessing his foreign companies to help the regime circumvent international sanctions.

Hashim Anwar al-Aqqad (b. Damascus, 1961) is the Chairman of Board of Directors for Sons of Anwar al-Aqqad Group and has been a member of the board of directors of the Damascus Chamber of Commerce, since 1992. Since 1994, he has also been elected several times as a member of the People's Assembly (the Parliament), and is a member of the Syrian-Russian Business Council.

Along with his brothers (Samer and Abdulkarim), Aqqad runs a large group of companies, including more than 14 companies in several sectors, the most prominent are:

- Aqqad Textile Company
- Anwar Aqqad Sons Trading Company
- Future for Media and Advertising
- Technology for Trading and Contracting

- United Company for Petrol Services
- Damascus Company for Tourism Investment
- Horizons Tourism and Transportation
- Royal Tourism
- International Medical Portfolio Agency (IMPA)
- Fiorella Pasta & Sugar Factory
- Sinjab Contracting Company
- The International Company for Medical Services
- Levant Tourism Services
- Professionals for Security and Surveillance
- Annur Company
- Albushra Company
- Alhashim Company
- He is a partner in the Golden Gate Company
- He is a partner in the Arabic Group for Expo

Hashim al-Aqqad was a close friend to Bassel al-Assad before the latter's death, which allowed him to expand his businesses through shady deals for governmental institutions. His influence reached to a point where he took over government-owned lands without any resistance.

In 2003, Aqqad managed to regain his business network after a period of recession (following the death of Bassel al-Assad), and provided Bashar al-Assad with a haven for money smuggling and laundering operations, through his companies located between Iraq, Syria, and Lebanon. He smuggled the money into Lebanon, laundered it, then transferred them through the al-Madina and al-Mawared banks, and under the supervision of Major General Rustom Ghazaleh.

Aqqad's shady businesses evolved later, when he landed several contracts to provide military and communications hardware to Saddam Hussein's regime, in collaboration with Maher al-Assad,

who later turned against Aqqad after a disagreement that turned out to be a temporary disagreement over commissions.

Following the outbreak of civil protests in March 2011, Aqqad and his brothers took the initiative to support the regime by providing oil derivatives, securing military equipment, and financing groups of shabiha in Damascus and its countryside.

He also provided food to the army, police, and the shabiha, in the form of his own food companies, products, especially the Fiorella Pasta & Sugar Factory, which was dependent on the flour of the subsidized ovens, and on suspicious flour deals that he smuggled in, claiming that they came from Arab countries.

In the meantime, Samer (Aqqad's brother) moved some Indian hardware and utilized his companies abroad to help the regime elude sanctions, which lead the EU to impose sanctions on him, for his regime-supporting activities.

The corruption charges followed Hashim and Samer al-Aqqad to Lebanon, where they borrowed 6 million US dollars from one of the banks, without paying. The authorities arrested Samer along with his brother Abdulkarim, however, he managed to elude the sentence after being moved to a hospital for his health condition, before being released under suspicious circumstances.

In 2018, Aqqad managed to obtain a court ruling against one of the Syrian banks, ordering them to pay him 20 billion Syrian pounds in compensation for alleged damages to his companies. And later that year he was assigned a property on the airport highway, for him to invest in and build.



Bade' Burhan Al-Droubi

Place of birth:
Homs 1966

A prominent commercial partner with Rami Makhlouf.

Owns 'Al-Droubi Group', 'Al Suwaidi LLC' trading, 'Al Suwaidi' for Cables, 'Al Suwaidi Electrics' and 'Al Ahlia' vegetable oil company.

Engagements: Major supportet and supplier of regime's militias in Homs.

Bade' al-Droubi (b. 1966, Homs) holds a degree in dentistry and a Master's degree in business administration and has been a member of the Syrian People's Assembly since 2012. He is the founder and chairman of the al-Droubi Group, in addition to several other companies, including:

- al-Aqaila Takaful Insurance Company
- The United Builders Company
- Suweidi Trading LLC
- Suweidi Cables Company
- Suweidi Electric Company
- Hayat Integrated Medical Solutions
- Sama Syria
- Ugarit Educational Company
- Damascus Tourism Investments
- Emitac Syria

- First Company Investments
- al-Ahliah Oils

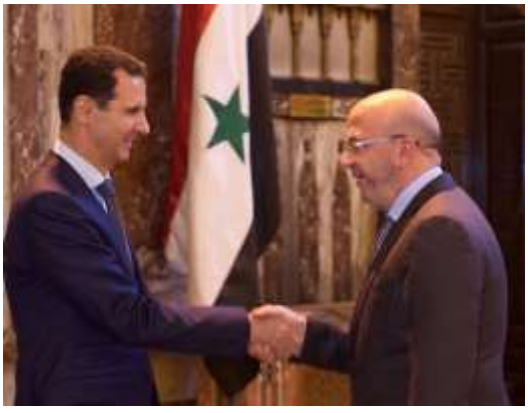
• He is a member of the board of trustees of the al-Manara private university and a member of the board of directors of the al-Karamah football team

Droubi is one of Rami Makhlouf's business fronts, and covered for Rami's name in the ownership of several companies and also funded a few militias in Homs city.

Although his shares in the al-Aqaila company are less than three percent, he has been its chairman for several years now.

Ihab Makhouf (Rami Makhlouf's brother) used to be his vice-president before he withdrew to attend to his other businesses. Another partner who is on the board of directors is Abdulhamid Dashti, a pro-regime Kuwaiti businessman. He also enjoys close ties with Nahid Murtada, a businessman of the United Builders Company, who, being an engineer himself, is in charge technically of t he shrine of Sayyida Zainab, and a member of the Syrian-Iranian Chamber of Commerce.

In addition to his close association with many sectarian regime-supporting figures, Droubi is a partner with Saleem Alton in the companies Ugarit and Sama Syria. As a result of these multiple partnerships and unlimited support for Bashar and Maher al-Assad, the regime appointed him as a member of the Syrian People's Assembly for two consecutive terms.





Atiah Mtanius Khouri

Place of Birth:
Homs 1972

Maintains a close relation with Rami Makhlouf and operates many of his subsidiaries.

Owns 'Attia Khoury' for Marketing and Commercial Industry (Marco), 'Monita' and 'Khoury and Khalili' for money transfer & exchange.

Engagements: Accused of employing his transfer & exchange companies in support of the regime to evade international sanctions, and paying ISIS for fuel procurement for the benefit of the regime.

Sanctions: Subject to U.S. sanctions since 2016.

Atiah Mtanius Khouri (originally from Kfarram, a village in the north-west of Homs city), has strong ties with Rami Makhlouf and Adib Mayaleh (former governor of the Central Bank of Syria). As a result of those partnerships, the regime gave preference to his company, Attia Khoury for Marketing and Commercial Industry – MARCO, which operates in three sectors: vegetables and fruits, marble, and natural stones, and chemicals.

Khouri also established two companies, Moneta for Money Transfers, and Khouri & Khalili Money Transfers (in partnership with Jordanian businessman Ayman al-Khalili).

There are accusations against Khouri of using the Moneta to elude the sanctions imposed on the Syrian regime, as his company is active in money transferring between Russia, Syria, and Lebanon.

In addition to the accusations of laundering money for the regime, there are other accusations against Khouri of buying oil from the Islamic State, in partnership with Mdallal Khouri and in collaboration with Adib Mayaleh.

As a result of his ties to the Makhlouf family, they assigned him to run several companies for them, under his name, so he became a member of the circle of the regime figures and one of the businessmen the regime leans on to elude sanctions.

On Jul. 21, 2016, the US Treasury listed Atiah Khouri's name among other names of businessmen and companies affiliated with Khouri (Mdallal Khouri, Ali Aws, and Youssef Arbash) on their list of sanctions. The US Treasury also imposed sanctions on Moneta Money Transfers.

Although he is on the sanctions list, Atiah Khoury managed to get residency in Hungary, for 300,000 dollars, through one of the programs initiated by the Hungarian government, and now he can move all through Europe with that residency.

Atiah Khouri is still working in Rami Makhlouf's shadow companies in the EU, and owns a whole network of agents he planted all over Europe, to help the regime elude the sanctions



Saeb Shafiq Nahhas

Place of birth:
Damascus, 1937

Involved in patching up the regime's damaged relations with many foreign countries.

Owns a large group of companies operating in tourism, food and medical sectors, including: 'Nahas International' for Traveling, 'Nahas Tourist.

Transport and Travel', 'Nahas Machinery and Trade', and 'Nahas Motor Company'.

Engagments: Provided the regime's forces with logistical and technical support and employed his medical companies to serve the chemical weapons' program

Saeb Shafiq Nahhas is a prominent Damascene businessmen. He started his commercial activities in 1953 and kept expanding until he became the owner of a large group of companies, working in various sectors, the most prominent of which are tourism, food, medical and others.

Saib Nahhas has connections with the regime's leaders, and helped support the regime's political and commercial activities. He worked on the restoration of the regime's relationships with several countries through his membership in the World Economic Forum and assuming the position of Honorary Consul of Mexico and Kazakhstan in Syria.

Among the most prominent companies run by Nahas and his two sons, Muhammad and Hadi, are:

- Nahhas International Tourism

- Nahhas Tourism and Transportation
- Nahhas Machinery and Trade Company
- Nahhas Computer Systems
- Nahhas Tourism
- Nahhas Automotive
- Nahhas Motors
- Nahhas Service Consulting
- Nahhas and Co. for Trading and Contracting
- Nahhas Company for Elevators and Escalators
- Ro'ya for Commercial Investments
- Orient Company
- Nour Investments
- Farouq Investments
- Modern Company for Cars
- Union Company for Trading and Distribution
- Syrian Company for Technology
- Ghadeer Drilling Wells
- The International Company for Medical and Sanitizer Trading
- Ibn Zahr for Pharmaceutical Industries
- They are also partners in the Syrian Arab Company for Agricultural Products Development (Ghadaq), with 18 percent of its shares
- The Blue Label Company
- Bee Order Food Delivery Company

Nahhas and his sons own many international agencies, including Volvo, Peugeot, and Hyundai, Hiab for loading equipment, Sigma Elevators, Temsa (Turkish bus manufacturer), al-Zamel Air Conditioning (Saudi Arabia), Perodua (Malaysian mini car company), Berlitz (language learning), Higer Buses (Chinese Bus Manufacturer), HERCU J.S.C for forklifts manufacturing, Intermix (German concrete mixers), Waitzinger (German concrete pumps), UTSCH Group (German Car Plates Manufacturer),

Mitsubishi Motors, NetSafe Information Technology Security Inc. (Turkey), Dornier Consulting, Otis Elevators, in addition to Swiss Airlines, Kuwaiti Airlines, Jet Airlines (India), and Gulf Air.

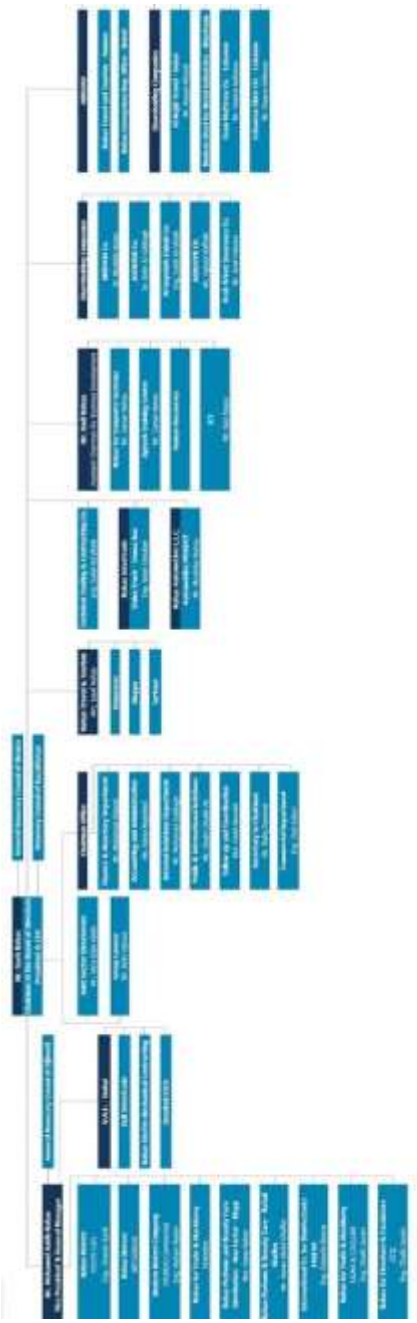
Hafez al-Assad supported Nahhas in his work and tasked him with strengthening trade relations with Iran and Hezbollah. Nahhas then benefited from his relationship with Bashar al-Assad, expanding his business in several Arab countries such as the United Arab Emirates, Lebanon, Jordan, and Sudan, in addition to other countries such as Mexico and Kazakhstan.

When the peaceful protests erupted in March 2011, Nahhas provided financial and logistical support to the Syrian regime, and he used his companies to serve the regime's agendas, especially in the sectors of tourism, hotels, and services, with the al-Safir Hotel, in the Sayyidah Zainab area in Damascus, becoming a grouping place for the sectarian militia members coming from Iraq, Lebanon and Iran. He also turned his farm on the Damascus International Road to a training camp for these militias under the supervision of the Iranian Revolutionary Guard.

Nahhas also provided technical services to the regime, in its oppressive operations, through his technical services companies. Additionally, he utilized his medical services companies, to assist the regime's chemical weapons program, and covering its prohibited activities in this field. That prompted George Sabra, the former President of the National Council, to submit a memorandum to the US State Department in 2013, calling for Saeb Nahhas and his companies to be put on the sanctions list as one of Assad's prominent supporters in the manufacturing and production of chemical weapons.

Despite the services provided by Nahhas and his sons to the regime, the Central Bank of Syria issued an order in 2015, imposing a seizure on Saeb Nahhas «and his sons» funds, due to a bank loan that he had not paid. The Central Bank of Syria later lifted the seizure.

After his move to Lebanon, Saeb Nahhas continued to support the Syrian regime, relying on his two sons to conduct his business in Syria and many other Arab and foreign countries.



The structure of Saeb Nahhas' companies and the names of the associated managers



Mahran Khawanda

Place of birth:
Tartus 1938

The most ranking businessman in the Syrian coast district and enjoys strong realtions with top security officers.

Ownes 'Qadmous chain', the largest fleet of inland transportation in Syria, in addition to a number of transfer & exchange insurance companies such as 'Arop' and the 'International' transfer & exchange company.

Engagements: Engaged in smuggling Syrian antiquities abroad, and provideding logistical support to the regime forces.

Sanctions: Subject to European Union sanctions.

Mahran Khawanda (originally from the Hamam Wassel village in Banyas city, in Tartous Governorate) is one of the most prominent businessmen in the Syrian coastal area, in addition to being the Honorary Consul of India in Lattakia, Tartous, and Homs, and the President of the Syrian-Indian Business Council.

Khawanda owns (along with his sons Ali, Ahmad, and Karim) several companies, the most prominent of which are:

- al-Kadmous Mail and Money Transfer Services
- al-Kadmous Tourism
- Syrian International Insurance Company AROPE
- International Exchange Company
- Mahran Khandah & Co. for the packing and drying of grains and food materials
- Syria and Overseas Financial Services

He is also a shareholder in the following companies:

- Syria Holding Company
- Syria & Gulf Bank
- Cham Bank
- Syria and Overseas Bank

He owns a Mazda car agency and is a provider of black-boxes for large trucks, and owns a large fleet of local transportation buses (registered to al-Kadmous Tourism Company). He also owns commercial ships and several investments in Egypt, India, and other countries.

Mahran Khawanda used to have ties with Major General Ali Douba, which allowed him to expand his business in Syria, seizing government-owned lands, and building parking lots for his fleets on those lands, in collaboration with Ali Douba. He is involved in corrupt activities, especially the smuggling of antiquities.

Following the outbreak of peaceful protests in March 2011, Khawanda initiated financial services to the regime, through his companies, banks, and insurance companies in which he owns shares. He put company's buses, garages, gas stations, and highways' rest areas at the service of the shabiha and regime militants, especially in the Syrian coastal area. Khawanda also provided the regime's militants with housing, food, and monthly salaries with his own money. His ships provided support abroad, and his banks provided financial cover to the regime to elude sanctions, which prompted the EU to add Khawanda to the sanctions lists. Afterward, Khawanda resigned from the board of directors of the Syria and Overseas Bank, and he claimed that he leased his buses to other parties, to evade the responsibility for the massacres and violations committed

by the regime forces between 2011-2012, in Tartous, Homs, Lattakia, and Hama.

Despite the services Khawanda provided to the regime, this did not prevent the Ministry of Finance from issuing Resolution 1145 -due to the criminal case (91/2014)- which ordered that a precautionary seizure be imposed on the movable and immovable properties of Mahran Khawanda, following accusations of smuggling goods into Syria, and the fine imposed on him was calculated at about 20 million Syrian pounds. However, he was able to solve that issue later.

As he turned 81, Khawanda resorted to his sons, Karim, Ali, and Ahmad to run his financial empire and continue facilitating the regime's operations through the al-Kadmous Group of companies that controlled a large portion of the local transportation in Syria, and he kept the role of general supervisor for himself.



Kareem Khawanda



Ali Khawanda



Mohammad Issam Shammout

Date of birth: 1971

Owns 'Shammout Group' for Trading which serves as a financial forefront for Rami Makhlouf, participates in the management of 'Sham Wings' owned by Makhlouf, in addition to operating a number of commercial companies notably: 'Shammout Motors', 'Noor' for Aluminum company, and 'Sky Blue Bird' travel company in Dubai.

Engagements: Engaged in transferring logistics, equipment, weapons and military ammunition from Iran to Syria, as well as transporting Iranian militias to Syria through 'Sham Wings'.

Sanctions: Subject to US sanctions.

Mohammad Issam Mohammad Anwar Shammout (also know as Issam Shammout), is one of the most prominent businessmen in Syria. He is the heir to the Shammout Trading Group (est. 1965), which is active in the shipping, import and export sectors. The group entered into an extensive partnerships with the public sector in the 1980s, which helped it to expand its activities into the iron and automobiles import business, and building electrical towers and pipes factories.

Shammout owns and runs several companies including, Shammout Trading Group, Shammout Motors, Noural Aluminium Extrusion, and Sky Blue Bird in Dubai.

Shammout Trading Group is one of Rami Makhlouf's business fronts, and Shammout runs Cham Wings Airline, which is owned by Rami Makhlouf.

Sources speak of Shammout's involvement in aiding the Syrian regime to elude the sanctions, especially in the air transportation field, where Cham Wings Airlines presented the perfect substitute cover for military activities and violations committed by the regime. The company transported military hardware, weapons, and ammunition from Iran, and transported Iranian Revolutionary Guard fighters to Syria, to participate in military operations. Flights were sent on a semi regular basis to al-Najaf Airport in Iraq, to transport Iraqi, Iranian, Afghani, and Pakistani militants.

Cham Wings Airlines signed a cooperation agreement in 2016, with Mahan Air (affiliated with the Islamic Revolutionary Guard), even though the US Treasury listed Mahan Air on its sanctions lists, and added more sanctions in 2016. Shammout assisted Mahan Air in purchasing nine airplanes, eight Airbus A340 planes, and one Airbus A320, which prompted the US authorities to add Sky Blue Bird -which is owned by Shammout and located in Dubai- to the US Treasury sanctions lists in 2015.

Cham Wings Airlines also provided transportation for Syrian refugees in Europe, back to Syria, secretly, in cooperation with Mahan Air, which transported them to Tehran, and then Cham Wings moved them to Damascus through Beirut and Qamishli airports, allowing them to use their Syrian ID Cards to cross the Syrian borders, eluding the European Authorities, and making it hard to get to the names of those who visited Syria after being granted asylum.

In 2016, Shammout obtained a license for an aviation company in Lebanon, named Lebanon Sky Aviation. However, the authorities revoked the license, following a scandal of Ghazi Zuaiter, the Lebanese Minister of Public Works and Transport,

as the investigations uncovered violations of the minimum safety conditions required by the ICAO.

At a number of public occasions, Issam has presented his father. Mohammad Anwar Shammout showed up in the celebration of Cham Wings signing a sponsorship contract with the Army Football Club.

Issam and his father are accessories to the Syrian regime's crimes and violations, funding Iranian militias, and helping the regime to elude sanctions. They also formed a commercial front for Rami Makhlouf's businesses.

Issam is still active between Syria and the UAE, despite being subject to sanctions by the US Treasury.



.Mohammad Anwar Shammout, Issam Shammout's father



Adnan Al-Ali

Place of Birth:
Lattakia 1968

Major agent for the General Intelligence Directorate, and an active financial representative for the Syrian regime in the energy and oil sectors.

Prominent oil importer from ISIS dominated regions on behalf of the Syrian regime.

Engagements: Engaged in supplying the Syrian Intelligence Directorate with logistical equipment from Iran.

Sanctions: Subject to US sanctions.

Adnan al-Ali operate as a commercial front for the Syrian regime, and he is related to several other regime-supporting businessmen, like Hussam Qaterji, and Nader al-Qalaai. He is active mostly in Lebanon and is in a close relationship with the businessmen Ammar al-Sharif and Samer Murtada (businessmen) in Ticari Sal Offshore.

Ali is accused of providing financial and logistical help to the Syrian regime, in the fields of oil and power, through the Abaar Petroleum Company (owned by him), which lead to him being added to the US Treasury list of sanctions as per order 13582. He is a General Intelligence Department agent, and secured logistical equipment for the General Intelligence Department from Iran.

In 2016, Abaar Petroleum imported oil shipments for the regime through Banyas port, including warplane fuel, and coordinated money transfers for those shipments, through bank accounts affiliated with the government.

In 2017, Ali used a bank account affiliated with him to receive wire transfers worth millions of dollars, from Mahruqat (a government-owned oil derivative products company). One transfer was about 30 million dollars.

Ali coordinated oil smuggling operations from Islamic State (ISIS) controlled areas to regime areas with the help of Qaterji's companies, with Ali becoming the godfather of trade operations between ISIS and the Syrian regime during that period.

Ali is still working behind the scenes, supporting the Syrian regime through a network of businessmen, and he runs his business activities (especially in the oil and energy sectors) using Lebanon as a center for his operations



Mohammad Khaled Mahjob

Place of Birth:
Damascus

Close friend of Bashar Al-Assad and one of his most prominent commercial agents.

Owns many companies, including 'Mahjoub Industrial Group', 'Al Jazeera Group' for investing and 'PVC Systems' for Modern Building Materials.

Engagements: Accused of managing commercial networks in favour of the Syrian regime through setting up a number of fake companies.

Mohammad Khaled Mahjob is an industrialist from Damascus who holds a degree in engineering. He is also the director and co-founder of several companies, the most prominent of which are:

- Mahjob Industrial Group
- Aljazeera Investment Group
- BFTH Systems Company for Modern Building Materials

He had a close relationship with Bassel al-Assad, and then he became a friend of Bashar al-Assad. He is one of Bashar al-Assad's most prominent economic fronts, and many public sector tenders were awarded to him, from which he collected a fortune.

Mahjob has been accused of running corrupt business networks, by creating shell companies, in the Hosh Plass area in Damascus countryside, for the purpose of using them for making deals with the public sector. He won big contracts with the public sector without offering official tenders, but by having mutual consent with the state, with the support of the Syrian Prime Ministry, and the direct instructions of Bashar al-Assad to support his industrial, and commercial activities.

Media sources talked about the many corrupt practices that Mahjob's companies were involved in, like the scandal of the Iranian company Amiran Mishkat Orond, which had a contract to supply the Ministry of Transportation with 1,200 buses. The company then turned out to be fake, working with a capital, owned by Khaled Mahjob and had one employee only, who was listed as the CEO. When word of the scandal spread, the state officially instructed that the case be closed and never written about again. This was to cover the fact that Mahjob was an agent of many Iranian governmental and private companies.

It is worth noting that the President's office manager introduced Khaled Mahjob to the Iranian Ambassador in Damascus as a personal friend of Bashar al-Assad, to secure Mahjob appointments with Iranian companies, and to discuss facilitating his work in Damascus. Mahjoub traveled several times as part of the economic delegation, accompanying the Prime Minister, and accompanied many ministers on their travels to Iran. He has already won some contracts from several Iranian companies during those visits.

According to informed sources, the Presidential Palace has enabled Khaled Mahjob to acquire those contracts, bypassing the official protocols and instructing the government to give priority to Mahjob in dealing with Iranian companies. This

allowed him to break the monopoly of the Syrian Petroleum Company on gas imports, and be the first company allowed to import natural gas to operate its buses.

To secure this deal, Khaled Mahjob intentionally set up a commercial company (Its address: Khorramshahr, Aria District, Kish Street, No. 347), which was a fake company with no employees, and with a small capital (1,100 dollars) in the Orond Free Zone. He then appointed Hasan Ahmad Akhwandy as the general manager and chairman of the company to collect large commissions on behalf of the owner, Khaled Mahjob. On its part, the company makes contracts with the Syrian state's companies, receives the contract value, and then pays the Iranian company. This way Mahjob collects the large commissions paid by the Iranian state's industrial companies, instead of paying the standard agent commissions at a rate no more than five percent, especially since the contracts are signed with a government agency in a friendly country, which is Syria.

Khaled Mahjob also has a close relationship with Rami Makhlouf, who has registered several projects in the name of Khaled Mahjob and his sister Rana, like the contracts of Alola (the Saudi company for real-estate development), and the Avenue project registered in Rana's name.

Khaled Mahjob, commissioned by Bashar al-Assad, undertakes the task of attracting expatriate Syrian businessmen to invest in Syria and persuading them that this will increase their profits, and among the most prominent investors attracted by Mahjob was the businessman Nabil Kizbari. Mahjob is also accused of secretly negotiating with Israel on behalf of Bashar al-Assad, at negotiations that took place in Turkey, and were arranged by Ibrahim Suleiman, the Syrian negotiator for the peace process.

Following the outbreak of peaceful protests in March 2011, Khaled Mahjob supported his master, Bashar al-Assad, by taking advantage of his American citizenship to promote the Syrian regime's propaganda in Western circles, and worked on distorting the popular movement in Syria in many external seminars, and described opponents of the regime as being affiliated with al-Qaeda.

In 2013, British journalist Robert Fisk wrote in The Independent (a British newspaper) about a meeting he had with Khaled Mahjob, in which the latter talked about his post-war vision, and reconstruction plans, denying that the Syrian regime committed the chemical massacre in eastern Ghouta in Damascus countryside. He said that Turkey, Saudi Arabia, and Qatar are obliged to pay reconstruction funds, on the pretext that they are responsible for supporting the armed opposition. Mahjob also stated that the Marshall Plan executed by the United States of America after World War II should be implemented.



Note that Khaled Mahjob focuses a lot on the reconstruction file, and calls for building eco-friendly houses, not caring about the destruction of cities and towns by the Syrian regime forces, or the killing and displacement of millions of Syrians. Assad and a group of his most trusted are working on big reconstruction files such as Marotta City, and Basilia City, through commercial fronts such as Khaled Mahjob and others.



Yaamor Darwish Al-Zuni

Place of Birth:
Damascus

Prominent businessman and head of the 'Syrian Ansar Party' set up by the Syrian intellgence.

Owns and operates a number of companies, including 'Aya Internet', 'Hala Aviation' and 'Al-Zouni' for trading and technology.

Yaamor Darwish al-Zouni holds a university degree in mechanical and electrical engineering. He worked as a consultant for the Speaker of the Syrian People's Assembly, between 2005 and 2006, as a director of informatics and research. He leads the Syrian Ansar Party internal opposition and is a director and co-founder in several commercial companies, such as:

- AYA Internet Service Provider
- Hala Aviation
- Alzouni Company
- al-Zouni Trading & Technology

He is closely related to the businessman Salim Daboul, one of Bashar al-Assad's men in the Damascus countryside, and in the Qalamoun region in particular. Zouni established his companies in cooperation with Salim Daboul's relatives.

Hala Aviation was founded in partnership with Mazen Rida Daboul, and Salim Daboul stands behind the AYA Internet Service Provider. This enabled Zouni to secure many projects related to the construction of buildings equipped with modern technology and computer networks, data networks, industrial and administrative automation, and industrial networks.

When peaceful protests erupted in Syria in 2011, Yaamor al-Zouni established the Syrian Ansar Party, as an opposition to the Baath Party. This operation was carried out in coordination with Salim Daboul, and inspired by Bashar al-Assad, especially since Yaamor al-Zouni is a member of the Baath Party.

Later on, the party's license was canceled, in an attempt to increase its popularity and to show zouni as a real opponent. Zouni was instructed to expand his business outside Syria, so he turned to Jordan, where he established several companies in partnership with the Daboul family. These companies included AYA Electronic Payment with a capital that exceeds 2 million dollars, which helped Zouni get Jordanian citizenship in 2018.





Mohammad Ali Wahoud

Place of birth:
Banyas, 1960

A prominent businessman in the investment and tourism sectors who works under the supervision of the Security apparatus.

Owns 'Wahhoud Group', 'Introduce' for tourism development and 'Wahhoud and "Ghassan Al-Tawil & partners' in addition to many other companies operating in Lebanon, Jordan, UAE, UK and the United States, which helped the regime evade international sanctions.

Sanctions: He closed down all of his subsidiaries in the UK to avoid being subject to European Union sanctions.

Mohammad Ali Wahoud (b. 1960, Banyas) is the founder and chairman of Wahoud Group and a co-founder of many other companies, such as:

- Antrados for Tourism Development
- Wahoud and Ghassan Altaweel and Partners Group
- al-Aqeelah for Takaful Insurance

He also owns several companies in Britain that were established in 1983, and work under the name of Wahoud Group. These companies work in and outside Syria and opened offices in the UAE, Lebanon, Jordan, Britain, and the US.

Informed sources talk about hidden partnerships that bring together Wahoud with individuals from the Syrian regime, led by Major General Ali Haider (the former commander

of the Special Forces). These relations have allowed him to establish networks that enabled him to work with a large number of regime institutions. His companies are working on many investment and tourism projects, as well as projects for ministries and governmental institutions, such as:

- The Syrian Railways
- The Port of Tartous
- The General Electricity Corporation
- The Syrian Telecom Company
- The Syrian Petroleum Company
- The Banyas Refinery Company
- The Ministry of Housing
- The Ministry of Tourism
- The Tartous Governorate Council

Wahoud has a close partnership with Kuwaiti businessman Abdul Hamid Dashti in al-Aqeelah Takaful Insurance, which is the same company that was previously run by Ihab Makhlouf and is now run by businessman Badee al-Droubi.

Mohammad Wahoud established the Antradous Hotel Project in 2006, represented by the construction of a tourist complex with an estimated cost of about 200 million dollars (later increased to 500 million dollars), including 140 million dollars in investment capital, and about 60 million dollars in contributions to the Tartous City Council. The project was established on an area of about 186,000 square meters, and it is implemented by the British company Junada International Limited, and its partners, Kerwood Investment Company Limited, Wahoud Group Limited, and the Governorate Council of Tartous City. However, all of those companies are owned by Mohammad Wahoud.

With the eruption of the peaceful protests in 2011, Mohammad Ali Wahoud sided with the regime, providing exceptional investment services, to support the regime's projects, and taking advantage of the corruption networks inside the ministries and institutions of the Syrian regime.

It is worth mentioning that Wahoud closed all of his companies in the UK, as he feared being subjected to the EU Sanctions, which affected businessmen close to the regime.



Kami Raeef Hilal

Place of Birth:
Khalkhala- Alsweida

Works as a commercial forefront for the regime together with Hashem Al-Aqad.

Owns many companies, including 'Professionals' for communication and technology services (Protech), 'professionals' for protection and Surveillance Systems and Services, 'Hilal and Hassoun' for trading and 'Syria' for commercial Investments.

Engagements: Involved in assisting the Syrian regime in evading international sanctions.

Kami Raeef Hilal, who was born in Khalkhala village in Suweida province, holds a bachelor's degree in engineering. He is the founder and chairman of several companies, such as:

- al-Mohtarefoon (The Professionals) for Communication Technologies and Services (Pro-Tech).
- al-Mohtarefoon for Protection and security Systems
- Hilal & Hassoun Commercial Company
- Syria for Commercial Investments
- Building Technology and Chemistry
- Russian-Arab Company for Tourism and Tourism Services, in partnership with Merna Hilal and the Russian investor Stanislav Govorushkin

He has a good relationship with the businessman Hashem Anwar al-Akkad and his brothers. They are partners in al-Mohtarefoon

for Communication Technologies and Services (Pro-Tech), which offers technical solutions in the fields of software, smart management, local networks, communications, and Internet services. This company has many branches, such as:

- PRO-NET: Internet service provider
- PRO-SYS: Advanced protection and alarm systems
- PRO-SOFT: Software solutions and applications
- PRO-SAT: Satellite and wireless communication services
- POWER: Alternative energy solutions
- PRO-GUARD: Protection services for companies in the commercial and industrial sectors such as cement factories, banks, international organizations, and service companies

Pro-Tech is a co-founder of the Russian-Arab Company for Information Technology and Communication (ALMA-Pro). The company has licenses to provide regular and encrypted TV channels, known as IPTV, through the internet service it provides.

In January 2019, Kami Hilal participated in the Syrian-Emirati Business Forum accompanied by about 60 Syrian businessmen, including Mohamed Hamsho, Labib Ikhwan, Issam Anbuba, and Tarif al-Akhras.

It is worth mentioning that Kami works as a commercial front for the regime in partnership with businessman Hashem al-Akkad, and the two parties are accused of cooperating to help the regime to circumvent the international sanctions imposed on it.



Mohammed Rami Martini

Place of Birth:
Aleppo 1970

Syrian Tourism Minister since 2018 and One of the most prominent partners of Makhlouf's family.

Owns and operates a number of tourism companies, including 'Coral Martini Hotel', 'Julia Dumna', 'Martini Tourism Investment', and 'Al-Ghad Al-Afdal' for Investment.

Engagements: Engaged in forming and funding groups of mercenaries "Shabiha", supplying them with weapons and instructing them to participate in the oppression campaign against Syrian civilians in Aleppo.

Sanctions: Subject to European Union sanctions in 2018.

Mohammed Rami Martini (b. 1970, Aleppo) received a bachelor's degree in civil engineering and was appointed as the Minister of Tourism in the government of the regime in 2018. He is the founder, owner, and manager of several companies, such as:

- Coral Martini Hotel
- Julia Dumna & Martini Tourism Investments Company
- Al-Ghad al-Afdal Investments Company
- Phiniqia Tourism Company.

In addition to being the head of the board of directors of Martini and Partners Company, he has also held many official posts. He was appointed as the Deputy Minister of Tourism from April 2014 to November 2018. He was the head of the Syrian-

Russian Business Council (2016-2018), and the President of the Federation of Syrian Chambers of Tourism (2008-2014).

Martini is one of the prominent partners of the Makhlouf family, and is supporting the regime through the companies he owns or runs on behalf of the Makhlouf family, especially Khaldoun Makhlouf, who is Martini's partner in Julia Dumna & Martini company.

Martini enjoys a strong relationship with Raseen and Mohammed Martini, the sons of the former Minister Mohammed Radwan Martini, and partners with them in a number of their companies. There are accusations that the Martinis laundered money that came from Iraq, for the Makhlouf family, as a part of the suspicious oil deals, before the fall of the Iraqi regime in 2003.

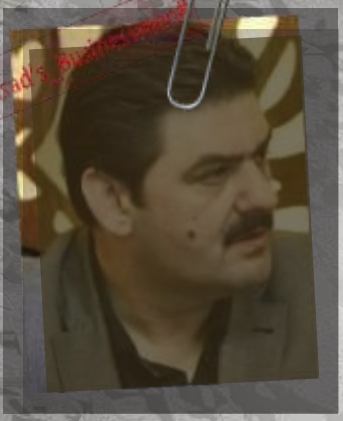
Minister Mohammed Martini is also related to Fares al-Shihabi, a businessman, and supporter of the regime, through al-Ghad al-Afdal Investments Company, and to Abdul Kader Sabra through Phiniqia Tourism Company.

In addition to his involvement in corruption, money laundering, and supporting the regime to circumvent the international sanctions, Minister Mohammed Martini participated with Raseen and Rami Martini in forming shabiha groups, supplying them with money and arms, and sending them to suppress peaceful demonstrations in Aleppo.

Those groups have later turned into armed militias that work within the regime forces in Aleppo city. The regime forces used sites belonging to the Martini companies and the Coral Martini Hotel. Some sources said that snipers used the roof of the Coral Martini Hotel to shoot civilians in the al-Hamadania area in Aleppo.

Once he became the Minister of Tourism in November 2018, Europe added Mohammed Martini to the European sanctions list due to his post. It would have been better if he had been listed in 2011 when he had directly participated in acts of suppression, killing, and corruption on behalf of the regime.





Baraa Qaterji

Place of birth:
Raqqa 1976

Brother of Hosam Qaterji, the oil, wheat and weapons biggest broker with ISIS.

Co-founder of several companies, including 'Al-Qaterji International Group', 'Aleppo Private Joint Stock Holding' and 'PS Oil Services'.

Engagements: Formed and funded armed militia known as "Al-Qaterji Group' that took part in the siege of Eastern Aleppo and committing atrocities in its neighborhoods in 2016.

Sanctions: Subject to US sanctions in 2018.

Businessman Muhammed Baraa Ahmed Rashdi Qaterji, known as Baraa Qaterji, was born in Raqqa in 1976 to a family from Al Bab city in Aleppo Baraa is the brother of businessman and lawmaker Hussam Qaterji and the founding partner of Qaterji International Group, which includes the following subsidiaries:

- Qaterji Engineering & Mechanical Industries (co-founder);
- Arvada Petroleum Company, which specializes in the preparation of design engineering studies for oil and gas infrastructure projects as well as determining the size of the investments necessary The company is licensed to dig exploratory and productive wells in land and sea and rent out drilling and exploration equipment It is also involved in the buying and selling of crude oil and hydrocarbon products, internally and externally (co-founder);
- Aleppo Joint Holding (co-founder);

- Jouzour for Agriculture and Ranching (co-founder and chairman);
- Alep for consultant & Technical (co-founder and chairman);
- BS Company for Oil Services , a Lebanon-based company that sells producers oil derivatives at the free rate set by the Syrian government The company also imports crude oil, which is then refined at Banias and Homs refineries before it's either sold to the domestic market or exported The company is used as a cover to import oil derivatives for the Syrian government amid the sanctions imposed on it (co-founder);
- Qaterji Real Estate Development and Investment Company (co-founder).

With his two brothers, Hussam and Muhammed, Baraa formed the Qaterji militia, an armed group that participated in operations that led to the siege of the eastern parts of Aleppo at the end of 2016 Thousands of people were killed or displaced to Idlib or Aleppo's countryside as a result of the siege

He represents the Syrian government in the Constitutional Committee

Baraa was associated with a number of corrupt financial and administrative networks across various state institutions until he reached the presidential palace where he became part of President Bashar Al-Assad's tight corruption circle, which also included businessman Rami Makhlouf

The Qaterji Group really began to expand its business following the 2011 uprising in Syria, especially after state forces lost Raqqa to the free army and eventually to ISIS At the time Baraa had become the main contractor in oil, wheat and arms deals between the three terrorist players involved; the Syrian

regime, ISIS and Kurdish militias going by the name the Syrian Democratic Forces (SDF)

Baraa benefited from ties he developed over the years in Raqqa and elsewhere to move oil and wheat from areas under the control of the SDF and ISIS to state-controlled areas He was also able to move arms in the opposite direction and provided ISIS fighters with material and military support, which, of course, helped enhance their influence and control

These transactions took place based on direct instructions from the general intelligence and under the watch of Syrian statesmen and local agents hired by the regime A Reuters report released on 11/10/2017 noted that the smuggling of oil inside Syria was being facilitated by the Keterji Group, which was added to the US's sanctions list in 2018 The US Treasury reported then that Baraa Qaterji had played the role of meditator between the Syrian regime and ISIS, transferring oil and arms shipments between the two sides

Qaterji Group is currently still establishing companies under the names of relatives that work in various fields, including tourism, steel and real estate The newly founded companies work to serve and consolidate the power of the Syrian regime The companies include:

Qaterji Company Agha for Textile Import and Export (no English equivalent found online), run by:

- Muhammed Beshir Keterji
- Ahmed Muhammed Beshir Qaterji
- Muhammed Nour Muhammed Beshir Keterji
- Muhammed Agha Beshir Qaterji
- Diaa Muhammed Beshir Qaterji

Foulaz Joint Holding Company for Metal Products (no English equivalent found online), which specializes in the import and export of metal derivatives, equipment and machinery needed by the state The company, which plans to establish a factory for cold rolled iron, is run by:

- Ahmed Beshir Muhammed Baraa Qaterji
- Muhammed Taher Muhammed Talaat Qaterji
- Muhammed Anas Abdel Qader Al Tayeb
- Muhammed Hamam Abdel Qader Al Tayeb
- Hussein Eldin Abdel Qader Al Tayeb
- Abdel Hady Abdel Qader Al Tayeb

Arman Company for Hotel and Coastal Management, which is run by:

- Ahmed Beshir Muhammed Baraa Qaterji
- Muhammed Taher Muhammed Talaat Qaterji
- Muhammed Baraa Muhammed Kanaan Qaterji
- Shabhaa Al Sham Company for Trade, Contracting, Import and Export (electronics and plastics), run by:
- Ahmed Muhammed Beshir Qaterji
- Muhammed Beshir Qaterji

Atyaf Company for Business and Shipping (foods, projects, sports, services), run by:

- Ahmed Agha Qaterji
- Talal Nayef El Gasem
- Zaman Elkhair Company for Investment, run by:
- Muhammed Agha Ben Ahmed Rushdi Qaterji
- Ahmed Adnan Al Shahabi

Al Maham Company for Protection and Security (provides security services to establishments), run by:

- Ghayath Ben Muhammed Qaterji
- Abdullah Ben Muhammed Nezar Qaterji
- Hussam Qaterji is responsible for media appearances while Baraa is still active behind the scenes, working with the Syrian regime





Baraa Qaterji with Bashar Al-Asad



Ahmed Nabil Al Kuzbari

Placeof birth:
Damascus 1971

Works as commercial forefront of Major General Bahjat Suleiman and represented the Syrian regime in Geneva and Astana negotiations.

Co-founder of 'Sham' Bank and 'Al-Sharq' Bank.

Engagements: Involved in financing local militias, who were involved in the crackdowns alongside the Syrian regime.

Lawyer and businessman Ahmed Nabil Mohammed Rafiq Al Kuzbari was born in Damascus in 1971 Kuzbari has served as a member of the Syrian People's Assembly since 2012, two consecutive terms, and heads the constitutional and legislative committee He studied law at the University of Damascus and claims to hold a master's degree and PhD in international law, although reports say they are fake Kuzbari also claims to hold a degree in English law as well as an expert certificate in Arab-British Academic Dispute and Crisis Management from British universities He is the co-founder of two banks:

- Cham Islamic Bank, of which he owns 5% (at the value of 250 million Syrian lira) and serves as deputy chairman;
- Bank Al-Sharq, of which he owns 1% (at the value of 37.5 million Syrian lira)

He is also a member of the:

- Syrian Lawyers' Syndicate
- Syrian Lawyers Association
- International Bar Association in the UK
- International Bar Association in France
- Inter-Pacific Bar Association
- National Committee to draft the constitution (2011-2012)
- Syrian government delegation at Geneva Conference (2014)
- Syrian government delegation at Geneva Conference (2015)
- Syrian government delegation at Geneva Conference (2016)
- Syrian government delegation at Astana conferences
- Syrian government delegation at Sochi Conference (2018)
- Syrian government delegation at Constitutional Committee (2019)

Ahmed is the brother of businessman Shadi Kuzbari who died in 2018 and who enjoyed close ties with former Syrian Ambassador to Jordan General Bahjat Sulieman Ahmed Kuzbari was the commercial front of businesses run by Sulieman's sons, Majd and Haidara, on behalf of their father These assets were mostly made through corrupt operations that ran for decades during which Bahjat served as an officer in the Syrian Intelligence, a position that enabled him to provide the necessary legal cover for the illicit deals Ahmed and Shadi Kuzbari were accused of suppressing the Syrian revolution through funding local militias that together with the Syrian regime silenced the people Shadi was also said to have been complicit in the kidnapping of Syrian activists in Lebanon in coordination with Syrian Ambassador to Beirut Ali Abdul Karim



A Photo of Ahmed Al-Kazbari and Colonel Samer Al-Baridi in one of the Astana's meetings



Bilal Al-Naal

Placeof birth:
Damascus

Commercial agent of many Syrian Officials.

Partner and founder of number of companies, including 'Damaskino Mall', 'Big Five' restaurants, 'Al-Na'al' for import and export, and 'Al-Na'al' for customs clearance.

Supports Fadi Saqr, leader of the 'National Defense' Militia, in Damascus.

Bilal Muhammad Al-Na'al from Damascus city is the founder of and a partner in a number of companies. He is also a member in the Damascus City Council and a member of Damascus Cham Holding. Al-Naal is also involved in the following companies:

- Qasioun Mall (founder)
- Big 5 Restaurants (partner)
- Abu Al Jadi Investment Company (founding partner)
- Al-Naal Trading Company L.L.C (owner and manager)
- Falcon for Tenders, Security and Shipping (general manager)
- Al-Naal for Customs Clearance
- RB for Trade and Investment
- Max 5 for Chemicals
- Al-Naal for Wood Works, Furniture and Trade
- Damaskino Mal (partner)
- Al-Amer Company

- Al-Sayed and Al-Naal (founding partner)
- Selena Company (founding partner)
- Siyaj for Real Estate Development and Investment (founding partner)
- Hospitality Engineers (chairman)
- Syrian-Russian Business Council (member)
- Syrian-Belarusian Business Council (member)

Starting out as a scrap dealer and importer, a friendship with Former Damascus Governor Bishr Al-Sabban helped Bilal Al-Naal build a strong network in the trade sector that allowed him to sign some suspicious deals.

His friendship with Al-Sabban also facilitated his membership in the Damascus City Council and later his membership in Damascus Cham Holding, the company behind Marota City.

Al-Naal's name began to appear to the public after he transformed a warehouse belonging to the General Consumers Corporation into the Qasioun Mall through a deal inked with Al-Sabban worth 20 million Syrian lira (annually) for the duration of 30 years. Due to corruption and conflicts with Syrian regime officials, Al-Naal eventually lost his share in the mall to businessman Wasim Qattan in a deal worth a staggering 1 billion and 20 million Syrian lira (annually). This deal led to the emergence of Qattan, who in essence was a commercial front for Rami Makhlouf, as a top businessman. In a statement after he lost his share, Al-Naal said: "On behalf of myself, I Bilal Al-Naal, a Syrian Arab citizen and an investor in Qasioun Mall, and on behalf of every administrative employee or worker at the mall, and in response to all the comments that have been made or will be, I would like to announce my commitment to any decision made by the ministry regarding the mall and my

objection to every offensive comment, and that is in line with my faith in the nation and its leader (Bashar Al-Assad) because if it weren't for this faith, I wouldn't have invested in my country during the crisis or considered myself, my family and my assets or anything I own soldiers under the disposal of the nation's leader Bashar Al-Assad."

In 2016, Bilal Al-Naal managed to develop companies that coordinated with the United Nations and UNICEF to supply aid to Syrians. His cooperation also extended to other global organizations working in Syria that were bringing supplies, especially from Turkey, into the country. Through his companies, the Syrian regime exchanged these supplies with local products to make profit.

Al-Naal also became associated with the sons of Ahmad Hassoun, the Grand Mufti of Syria, through Siyaj for Real Estate Development and Investment, which has been involved in reconstruction projects.

After he lost his share in Qasioun Mall, Al-Naal bought late businessman Abdul Rahman Al-Attar's share (40%) in Damaskino Mall, making him the biggest shareowner in the mall. The size of the deal was never announced.

Al-Naal, alongside Al-Sabban, had ties with Fadi Sakr, one of the leaders of the militias belonging to state forces in Damascus. Both businessmen supported Sakr's militia, which committed crimes against civilians in Damascus and its countryside. Al-Naal has repeatedly expressed support for the Syrian army and Bashar Al-Assad as a benefiter of the regime's crimes and the corruption rooted in state institutions.

Al-Naal had once told state TV: "Anyone who hasn't left the country during these difficult times, whether they are a teacher,

intellectual or family man, and every employee or worker or student who has stayed to work in their lab, factory, school or university is a soldier who has helped the Syrian Arab army and the nation stay strong. All those who have stayed are as noble as the soldiers who have sacrificed their lives for the country as they showed the army they weren't standing alone against the dirty conspiracy faced by Syria."

At the beginning of 2019, Bilal Al-Naal signed a partnership with businessman Emad Al-Sayed, the owner of Farouj Al-Zain (a restaurant chain), to launch a restaurant chain called Gedo Abu Emad of which the first branch opened in Barzeh in Damascus. The restaurant's cuisine resembles KFC.

Bilal Muhammed Al-Naal has served as a commercial front for Bishr Al-Sabban, the Grand Mufti Ahmad Hassoun's sons as well as other Syrian state officials, due in part to his role as a member of the Damascus City Council and Damascus Cham Holding. Through the role he has protected the Syrian regime's assets.



Muhammad Kaband

Placeof birth:
Aleppo 1953

Started his career as a falafel vendor in Aleppo, and turned in to time to a businessman, when the Syrian regime chose him to act as an agent for its businesses.

Owns 'Qaband' for artistic production and co-founder in "Al Ayham" investment company.

Engagements: Engaged in recruiting mercenaries "shabiha" to participate in the suppression of civilians in Aleppo.

Accused of kidnapping competing wealthy merchants of Aleppo and demanding their families to pay huge ransoms for their release.

Businessman Muhammad Abdul Qader Kaband, who was born in Aleppo in 1953, began his life as a peppers seller, eventually making his way into becoming a businessman, TV producer and member of the people's assembly. Kaband owns the following companies:

- Kaband Art Production (owner and chairman)
- Al-Ayham Investment Company (general manager and founding partner)

Businessman Muhammed Kaband had a mysterious start; after beginning his life as a vegetables vendor, he transformed himself in less than 10 years into a businessman and went on to produce a number of media works. Muhammed Kaband was imprisoned in Aleppo for a short period of time for suspicion

of committing violations against the law before being released due to the intervention of top regime personalities.

Kaband then moved to Damascus before emerging as a businessman, TV producer as well as player in the real estate investment sector in key areas in Damascus such as Dimas and Qudsaya.

Thanks to his ties with members of the regime, whether in the army or other security services, Kaband was able to buy land on which he built real estate projects, which profited him and his allies.

One piece of land he bought in Qudsaya for 40 million Syrian lira saw its price increase tenfold in a short period of time. The businessman was also able to develop a housing project of 4,000 apartments in Dimas, an area known to attract the influenced of which include members of the republican guard and the fourth division of the Syrian army.

Kaband's purchase of barren land in Sednaya and Jisreen was highly mysterious, especially as they require difficult-to-obtain security permits.

His business in Damascus has taken place in parallel with his business in Aleppo where he bought land in areas nearby prestigious neighborhoods to develop investment projects that have generated easy profit for himself and his allies. Every piece of land he has bought more than doubled in price shortly after his purchase.

Kaband has been one of the businessmen who stood by the Syrian regime during and after the 2011 revolution. Since the revolution broke out, he has recruited thugs from Aleppo who have participated in the suppression of peaceful protests in the city in various ways, including detaining protesters and activists

and handing them over to authorities. His team of thugs eventually became part of the national defense team.

Kaband has also intimidated and threatened individuals he is in personal conflict with, sometimes making false accusations against them in exchange for financial payments. He has also been involved in the kidnapping of some of Aleppo's wealthy for ransoms and is known to have accused his competition of association with the Syrian opposition to intimidate them and impose royalties on them. Any profit he has made since his rise has been shared with his supporters of security and army officers and regime officials.

Even though Kaband is from Aleppo and had no influence in Damascus, he ran in the 2016 parliamentary elections under the guidance of military intelligence to represent Damascus's countryside and won. The businessman had prior to his victory run a number of times in Aleppo but failed due to an ill reputation there.

In March 2018, Kaband forced displaced persons from Eastern Gouta - who had fled escaping bomb attacks by the Syrian regime and Russia – to chant for Bashar Al-Assad in exchange for desperately needed bottles of drinking water and some food. The despicable act is what Kaband became known for and though he has denied it, there are pictures and videos of the event proving his complicity.

The title "doctor" is often pared with his name even though he is uneducated and holds no certificates. In fact, Kaband has no qualifications to be a businessman, parliament representative or TV producer and could not have reached any achievements if it weren't for his ties with corrupt statesmen as well as security and intelligence officers.

FUNDING WAR CRIMES

SYRIAN BUSINESSMEN WHO KEPT ASSAD GOING

Nine years after the revolution broke out in Syria, the country has entered a new phase where the war led by Bashar Al-Assad and his Russian and Iranian allies is becoming more intense and bloody, as the economic situation worsens, sending many into poverty and hunger.

But the regime, with all of its institutions, army, security apparatuses and militias, was not the only one responsible for the torture, displacement and tragedy of the Syrian people. It could not have done it without the help of loyal businessmen whose funding ensured it stayed in power and who facilitated the illicit ways in which the regime was able to get around international sanctions.

With the help of Russian and Iranian allies, businessmen helped the regime maintain a steady supply of arms, ammunition and fuel in the face of sanctions through the establishment of counterfeit companies and other manipulative methods. Some of these businessmen were also directly complicit in the oppression, killing and displacement of Syrians through either funding militias or directly leading them in some cases. Therefore, any war crimes or crimes committed by the regime must take into account the role played by these businessmen.

This book exposes the main businessmen who were complicit in crimes and violations committed by the Syrian regime for a clearer view of the circle that helped Bashar Al-Assad stay in power.

/projusticeorg
www.pro-justice.org