



CiFAR was founded in 2015 to support civil society to campaign across borders to prevent public asset theft and for accountable and transparent asset recovery.

Our mission is to amplify as the voice of civil society worldwide on stolen assets, to support civil society across the globe to be a strong and effective actor on stolen asset recovery and to close the gap missing in global civil society asset recovery work.

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CiFAR 2017



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A country of 25 million people, until 1990 Yemen was divided into North Yemen, supported by Saudi Arabia and the West, and South Yemen, supported by the USSR. While the two Yemens unified in 1990, tensions between the two continued into the early 1990s due to claims of marginalisation from the former South Yemen state.

Born in Sanaa', much of Yemen's recent history has been bound up with former President Ali Abdullah Saleh. With a background in the then-North Yemen military, Saleh assumed the presidency of North Yemen in 1978 following a coup and become President of a united Yemen in 1990, a position he was ultimately to hold for a total of 33 years.

In January 2011, demonstrations began against his continued rule of Yemen. Despite promises by Saleh that he would not seek re-election, the protests grew and a security crackdown in response to protests is estimated to have killed between 200 and 2000 people. By April 2011, the continued protests led to a deal brokered between Saleh's political party -the General People's Congress - and Saudi Arabia to pave the way for Saleh to hand over power. Saleh rejected the deal however and several army units, as well as the Hashid tribal federation, joined the opposition against him. In June 2011, Saleh was injured in an attack and travelled abroad for medical treatment. Amongst renewed clashes in autumn 2011, he signed an agreement to hand over power to his deputy - Abdrabbuh Mansour Hadi - who would take power as President and start a transition to democratic rule. After three months of interim rule, Hadi stood unopposed in presidential elections in March 2012.

During his time in power, Saleh is alleged to have amassed a fortune of between US\$32 and \$60 billion, transferred abroad through false names and in the form of property, cash, shares, gold and other commodities. However, as part of the deal made for Saleh to give up power, the Yemen authorities agreed to provide him with immunity from prosecution, making the recovery of any ill-gotten wealth very challenging.

Following Saleh's removal from power, a transition period was begun, which quickly started to break down. Attacks by Al Qaeda, strong separatist claims, the loyalty of the army to Saleh, alongside corruption, unemployment and food insecurity weakened Hadi's government.

This weakness was capitalised upon by the Houthi movement, a political-religious movement with a base North of Sanaa', which led a military attack against the Hadi government and was able to capture Sanaa' and much of the North and West of Yemen, with the support of Saleh and forces loyal to him within the army. Hadi fled to Aden, in the south of Yemen and is currently being hosted by Saudi Arabia, with his forces controlling the South and East of Yemen. In March 2015, Saudi Arabia launched a military coalition offence against the Houthis.



In December 2017, Saleh was killed in fighting between his faction and the Houtis.



In February 2014 the UN Security Council issued a resolution against named people believed to be belligerents in the civil war. This resolution required UN Member States to take a number of steps, including:

- Asset freezes, meaning that all UN Member states should freeze "all funds, other financial assets and
 economic resources that are owned or controlled, directly or indirectly, by the individuals or entities"
 listed, or "by individuals or entities acting on their behalf or at their direction, or by entities owned or
 controlled by them". It also requires UN Member States to ensure that "no funds, financial assets or
 economic resources be made available to or for the benefit of such individuals or entities";
- Travel bans, prohibiting the "entry into or transit through States' territories of individuals" on the list:
- Arms embargoes, prohibiting the sale or transfer of arms to persons and entities on the list, as well as providing support for their military actions.

Despite his death, these sanctions remain in force with respect to Saleh.



What should you as a company, retailer, real estate agent or financial institution do?

Companies, retailers, real estate agents and financial institutions should not do business with persons on the sanctions list and should contact national authorities immediately if they identify assets belonging to one of the persons subject to the sanctions list.

It can often be the case that persons subject to sanctions use companies and individuals to hide the true owner of the assets. It is therefore essential that companies take reasonable steps to identify the real, beneficial owner of the company.

Persons subject to sanctions (as of 29 October 2017)



Abd Al-Khaliq Al-Houlhi

YEi.OO1

Name: ABD AL-KHALIQ AL-HOUTHI Name (original script): عبدالخالق الحوثي

Huthi military commander

DOB: 1984 POB: na

Also known as: a) Abd-al-Khaliq al-Huthi b) Abd-al-Khaliq Badr-al-Din al Huthi c) 'Abd al-Khaliq Badr al-Din al-

Huthi d) Abd al-Khaliq al-Huthi

Nationality: Yemen Passport no: na

National identification no: na

Address: na

Other information: Gender [Male].



Abdullah Yahya Al-Hakim

YEi.OO2

Name: ABDULLAH YAHYA AL HAKIM Name (original script): عبد الله يحيى الحاكم Huthi group second-in-command

Date of birth: a) Approximately 1985 b) Between

1984 and 1986

Place of birth: a) Dahyan, Yemen b) Sa'dah

Governorate, Yemen

Also known as: a) Abu Ali al Ḥakim b) Abu-Ali al-

Hakim c) Abdallah al-Hakim d) Abu Ali Alhakim e) Abdallah al-Mu'ayyad

Nationality: Yemen

Address: Dahyan, Sa'dah Governorate, Yemen

Other information: Gender [Male].

Persons subject to sanctions

(as of 29 October 2017)

علي عبد الله صالح / Ali Abdullah Saleh [deceased]

YEi.OO3

Name: ALI ABDULLAH SALEH Name (original script): على عبد الله صالح

Designation: a) President of Yemen's General People's Congress

party b) Former President of the Republic of Yemen

Date of birth: a) 21 Mar. 1945 b) 21 Mar. 1946 c) 21 Mar. 1942 d) 21 Mar. 1947 Place of birth: a) Bayt al-Ahmar, Sana'a Governorate, Yemen b) Sana'a,

Yemen c) Sana'a, Sanhan, Al-Rib' al-Sharqi

Also know as.: Ali Abdallah Salih

Nationality: Yemen

Passport no: OOO16161 (Yemen)
National identification: O1O10744444
Other information: Gender [Male]



Abdulmalik Al-Houthi



Name: ABDULMALIK AL-HOUTHI Also known as: Abdulmalik al-Huthi Other information: Leader of Yemen's Houthi Movement. Has engaged in acts that threaten the peace, security, or

stability of Yemen.

What can you as civil society do?

Civil society has a large role to play in this. Actions civil society could take include:

- making sure that your government is implementing the UN sanctions fully,
- working to identify assets relating to persons subject to sanctions,
- promoting compliance in the private sector, for example by raising awareness of the sanctions and their obligations under them.

For more information, visit: www.cifar.eu



Ahmed Ali Abdallah Saleh

YEi.OO5

Name: AHMED ALI ABDULLAH SALEH Name (original script): أحمد علي عبد الله صالح Title: Former Ambassador, former Brigadier

Date of birth: 25 Jul. 1972

Also known as: Ahmed Ali Abdullah Al-Ahmar

Nationality: Yemen

Passport no: a) (Yemeni passport number 17979 issued under name Ahmed Ali Abdullah Saleh (referred to in the diplomatic identity number no::31/2013/20/003140 below)) b) (Yemeni passport number 02117777 issued on 08-11-2005 under name Ahmed Ali Abdullah Al-Ahmar (good quality a.k.a.)) c) (Yemeni passport number 06070777 issued on 03-12-2014 under name Ahmed Ali Abdullah Al-Ahmar (good quality a.k.a.))

Address: United Arab Emirates

Other information: Has played a key role in facilitating the Houthi military expansion. Has engaged in acts that threaten the peace, security, or stability of Yemen. Ahmed Saleh is the son of the former President of the Republic of Yemen, Ali Abdullah Saleh (YEi.OO3). Ahmed Ali Abdullah Saleh comes from an area known as Bayt Al-Ahmar, which lies some 20 kilometres southeast of the capital, Sana'a. Diplomatic identity card no.:31/2013/20/003140, issued on 07-07-2013 by the United Arab Emirates' Ministry of Foreign Affairs under name Ahmed Ali Abdullah Saleh; current status: cancelled.

SANCTIONS





Since 2014 the UN Panel of Experts under UNSC Resolution 2140 has been tracking the funds and companies allegedly linked to persons included on the UN Sanctions list.



FOLLOWING THE MONEY

According to their reports, there is the potential that money is hidden in up to 20 jurisdictions, with confirmed reports of assets frozen in the UAE, Malaysia, the Netherlands and France. This includes both money in bank accounts and real estate.

It also includes a list of companies apparently registered to persons on the sanctions list or ultimately owned by them. These companies are or have been registered in the Bahamas, the British Virgin Islands, the UAE, the Cayman Islands, the Turks and Caicos Islands, Switzerland, the Netherlands and France.



Possible asset locations Source: UNSC Res. 2140 Panel Reports, CiFAR research

Companies alleged connected to persons on the sanctions list

- Albula Limited (formerly Harrison Limited)
- Ansan Wikfs Limited
- CW Management
- Foxford Management Limited
- New World Trust Corporation
- **New World Trust Services** Limited (formerly New World Nominees Limited)
- Pact Trust
- Precision Diamond Limited
- Raydan Investments
- SCI 59 Rue Galilee
- Tilsit Real Estate BV
- Towkay Limited
- Trice Boom Limited
- Unmatchable Limited
- Weisen Limited (formerly Centaure Limited)
- Wildhorse Corporation
- Wildhorse Investments

In 2017, CiFAR made a number of access to information requests to determine whether further assets were hidden in Europe

Starting in summer 2017, CiFAR and our supporters submitted access to information questions to determine, in certain European jurisdictions, whether or not assets relating to persons subject to the UN Security Council resolution on Yemen had been frozen and whether investigations had taken place.

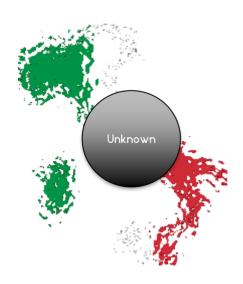
Germany

According to authorities in Germany, no assets relating to persons subject to the Resolution have been frozen.



Italy

Despite a request and an appeal made to the Italian authorities, they refused to provide information in response to any of our questions.



We asked the questions:

- Are there any asset freezes in place with respect to assets suspected of belonging to Ali Abdallah Saleh or other named individuals subject to UN Security Council Resolution 2342 (2017) and previous resolutions on Yemen in your country?
- 2. If so, what is the estimated total value of assets currently frozen?
- 3. If not, what steps have been taken to identify assets that could belong to the individuals subject to this resolution?



Spain

Despite a request to the Spanish authorities, they refused to provide information in response to any of our questions.

FOLLOWING THE MONEY

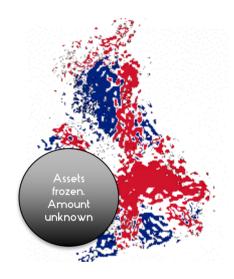
Switzerland

Swiss authorities responded positively to our request and provided information on the various measures it had taken to implement the Security Council resolution in Switzerland.

They also reported that they had registered CHF4.4. million (€3,76 million) from Swiss banks as frozen following the measures taken and that this amount remains frozen currently.



United Kingdom



The British authorities responded to our request and provided partial information to our questions.

Are there any asset freezes in place with respect to assets suspected of belonging sanctioned individuals?

The UK has frozen assets under the Security Council resolution.

If so, what is the estimated total value of assets currently frozen?

Authorities in the UK refused to release information regarding this questions. They stated that under the relevant EU Council Regulation (1352/2014) implemented to ensure the asset freeze was applied across the EU, they were only allowed to use the information gathered for the purposes of the Regulation.

If not, what steps have been taken to identify assets that could belong to the individuals subject to this resolution?

The UK authorities stated that it is up to those holding or controlling the assets to report them to UK authorities, but that UK authorities promote compliance with the Resolution.

FOLLOWING THE MONEY

The war in Yemen is showing no signs of ending in the near future. It is therefore more important than ever that sanctions that would prevent this money from being used for the war are properly enforced.

Beyond the war however, it is unclear what would happen to these funds. While there have been several reports alleging that Ali Abdallah Saleh enriched himself through public funds during his time in power, there were no cases brought against him and any allegations remain only allegations. With his death in 2017, the likelihood of any investigations into this wealth seems more remote. At the same time, the sanctions put in place by the UN Security Council relate to peace and security during the conflict and will potentially be removed if peace is achieved.

During a period of acute crisis in Yemen, it is easy to ignore grand corruption in the face of many other challenges, but for Yemen to rebuild, this money will be essential. We furthermore believe that all Yemenis have a right to know when and if public money has been stolen and if it is still being stolen, to hold public figures accountable and to see that money returned to them if it is the proceeds of corruption.

RECOMMENDATIONS

- All assets currently frozen under UN SC Resolution 214O should remain frozen until hostilities are over and notwithstanding the death of Ali Abdallah Saleh
- Governments should proactively identify and release general information on assets they have frozen
- Investigations should be initiated in the countries where the assets are located as to possible criminal origin
- Any assets found to be of criminal origin should be held in trust for the people of Yemen, who should decide on the future of those assets
- ❖ Yemeni civil society should be involved in this process to the utmost extent



REFERENCES

PART 1

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- ❖ \$/2015/125: Final report of the Panel of Experts in accordance with paragraph 21 (c) of resolution 2140 (2014)
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PART 2

Security Council Committee Established Pursuant to Resolution 2140 (2014): Sanctions List Materials - 2140 Sanctions List, https://www.un.org/sc/suborg/en/sanctions/2140/materials

PART 3

- Reports of the Panel of Experts established under UN Security Council Resolution 2140:
 - \$ \$/2015/125: Final report of the Panel of Experts in accordance with paragraph 21 (c) of resolution 2140 (2014)
 - \$/2016/73: Final report of the Panel of Experts in accordance with paragraph 5 of resolution 2204 (2015)
 - \$\sqrt{5/2017/81}: Final report of the Panel of Experts in accordance with paragraph 6 of resolution 2266 (2016)
- Correspondence between members of CiFAR e.V. and freedom of information departments.





