



*SECRETARIA DE HACIENDA Y CREDITO PUBLICO*  
**COMISION NACIONAL DE SEGUROS Y FIANZAS**

México, D. F., 6 de octubre de 2003

**OFICIO-CIRCULAR SF- 53/03**

**ASUNTO:** Se dan a conocer listas relacionadas con la Orden Ejecutiva sobre Financiamiento al Terrorismo 13224.

**A LAS INSTITUCIONES Y SOCIEDADES  
MUTUALISTAS DE SEGUROS E  
INSTITUCIONES DE FIANZAS**

La Secretaría de Hacienda y Crédito Público, Dirección General de Seguros y Valores mediante Oficio No. 366-III-E-3473 de 12 del mes en curso, con fundamento en el artículo 32 de su Reglamento Interior, solicita a esta Comisión dé a conocer a esas instituciones y sociedades tres listas relacionadas con la Orden Ejecutiva sobre Financiamiento al Terrorismo 13224 del 23 de septiembre de 2001, las cuales contienen nombres de personas físicas y morales presuntamente asociadas con la comisión de actos terroristas, listas que fueron remitidas por la Embajada de los Estados Unidos de América.

Por lo expuesto, se anexan al presente las listas de que se trata, las cuales se dan a conocer en su versión original en idioma inglés, solicitándoles lo siguiente:

1. Que extremen precauciones con respecto a los negocios y operaciones que pudiesen llevar a cabo con las personas señaladas en las listas que nos ocupan.
2. Reporten, por conducto de esta Comisión, a la Dirección General Adjunta de Investigación de Operaciones en términos de la regulación aplicable, aquellas transacciones que pudieran estar relacionadas con las personas señaladas en las listas de referencia.
3. En virtud de que dichas personas pudiesen estar vinculadas con actividades terroristas, actualizar las hipótesis previstas en nuestra regulación y considerar las operaciones que éstas realicen como inusuales, en términos de las Disposiciones de

Carácter General a que se refieren los artículos 140 de la Ley General de Instituciones y Sociedades Mutualistas de Seguros y 112 de la Ley Federal de Instituciones de Fianzas.


4. Permanezcan atentas a cualquier requerimiento de esta Comisión.

Lo anterior se hace de su conocimiento con fundamento en los artículos 108 fracción IV de la Ley General de Instituciones y Sociedades Mutualistas de Seguros, 68 fracción VI de la Ley Federal de Instituciones de Fianzas y de conformidad con el Acuerdo por el que la Junta de Gobierno de la Comisión Nacional de Seguros y Fianzas delega en el presidente la facultad de emitir las disposiciones necesarias para el ejercicio de las facultades que la ley le otorga a dicha Comisión, y para el eficaz cumplimiento de la misma y de las reglas y reglamentos, emitido el 2 de diciembre de 1998 y publicado en el Diario Oficial de la Federación el 4 de enero de 1999.

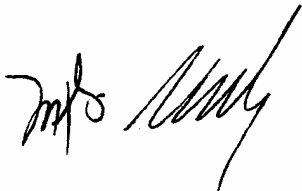
**Atentamente**  
**SUFRAGIO EFECTIVO. NO REELECCION.**  
**COMISION NACIONAL DE SEGUROS Y FIANZAS**  
**El Presidente**



**LIC. MANUEL S. AGUILERA VERDUZCO**



**ANEXOS**



I. NAME OF INDIVIDUALS TO BE DESIGNATED UNDER E.O. 13224:

-- Sheik Ahmed Ismail YASSIN

-- Imad Khalil AL-ALAMI

-- Usama HAMDAN

-- Khalid MISHAAL

-- Musa Abu MARZOUK

-- Abdel Azia RANTISI

II. NAME OF ORGANIZATIONS TO BE DESIGNATED UNDER E.O. 13224:

-- Comite de Bienfaisance et de Secours aux Palestiniens  
and Association De Secours Palestinien (ASP)

-- Palestinian Association of Austria (PVOE)

-- Palestinian Relief and Development Fund (Interpal)

-- Sanibil Association for Relief and Development

## Talking Points

-- President Bush intends to announce today that the U.S. is designating for asset-freezing under U.S. Executive Order the names of six HAMAS leaders and four HAMAS charities.

-- HAMAS' bloody suicide attack in Jerusalem on August 19 demonstrates convincingly its resolute opposition to a peaceful settlement of the Israeli-Palestinian conflict.

-- There can now be no question that HAMAS is a major obstacle to the efforts of Palestinian Prime Minister Mahmoud Abbas to negotiate an end to the violence and bloodshed.

-- HAMAS and other Palestinian rejectionist groups must not be permitted to undermine the aspirations of the Palestinian people for a viable, secure state and an end to the occupation of their territory.

-- As this Administration has noted on numerous occasions, peace in the Middle East, peace between the Israelis and Palestinians, can only be achieved with the support of regional and global partners. Supporting peace means isolating those organizations, such as HAMAS, that seek to undermine it.

-- There can no longer be any illusion regarding the false division of HAMAS into a political organization that is acceptable and a "military" branch that is not. HAMAS' leadership is one and the same: those at the top control the group's social welfare work just as they control the group's terrorist activities. HAMAS has one goal: the elimination of Israel. Everything it does is aimed at this end.

-- Even though the Palestinian Authority and Arab states have endorsed the road map devised by the Quartet, HAMAS continues to reject constructive efforts toward a peaceful solution to the Middle-East conflict and to stage terrorist attacks against Israelis.

-- Shutting off the flow of funds to HAMAS is crucial to reducing HAMAS' ability to carry out its activities and thwart progress towards peace.

-- Accordingly, the U.S. Government is preparing to designate and freeze the assets of six top HAMAS leaders and four HAMAS-supporting NGOs under U.S. Executive Order 13224 on terrorist financing today, August 21.

-- The President intends to make a formal public announcement of this designation today.

-- We ask your government's support for these designations that the United States plans to make.

-- The U.S. would also like to stress that we do not wish to cut off funding of charitable activity in the Palestinian territories. Accordingly, we would also like to explore ways to ensure that humanitarian assistance can continue to be delivered to the Palestinian territories.

-- The Palestinian Authority has stated to us its intention to intensify efforts to stop the flow of financing to HAMAS. It has asked the United States to share information on which the PA could act to freeze accounts, which we are doing.

-- The U.S. will do everything it can to ensure that those governments which assist in funding or otherwise supporting HAMAS fully understand that their own activities are also counter to the goal of peace.

-- We urge you to check carefully for offices or financial assets of these individuals and organizations and their aliases in your country.

-- We hope that you will share with us any actions or blocking of assets that you undertake. In addition, we would welcome any information that you would like to share with us regarding the existence and activities of these individuals and organization in your country.

-- We appreciate the close cooperation between our governments in this effort and your willingness to forego any public announcement or discussions of this action until after it is announced in the United States.

## Background Paper

### HAMAS:

HAMAS is a terrorist organization that has intentionally killed hundreds of innocent civilians and continues to kill and maim with the aim of terrorizing a civilian population. HAMAS was formed in 1987 as an outgrowth of the Palestinian branch of the Muslim Brotherhood. HAMAS activists have conducted many attacks - including large-scale suicide bombings - against Israeli citizens and military targets. In the early 1990s, they also targeted U.S. citizens, suspected Palestinian collaborators and Fatah rivals.

During 2002, more than 370 persons - including 10 US citizens - were killed in Israel, the West Bank and the Gaza Strip by acts of terrorism. HAMAS was responsible for carrying out more than 50 of these attacks, including shootings, suicide bombings, and standoff mortar-and-rocket attacks against civilian and military targets. The group was responsible for the most deadly Palestinian terrorist attack of the year - the suicide bombings of a Passover gathering at a Netanya hotel that killed 29 Israelis, including one dual US-Israeli citizen. HAMAS's bombing of a cafeteria on the Hebrew University campus, which killed nine, including five US citizens, demonstrated its willingness to stage operations in areas frequented by students and tourists, including US citizens.

In addition, HAMAS's rejectionist policies and terrorist actions are aimed at derailing the peace process in the Middle East. On April 30, 2003, the U.S. government released the roadmap for peace between Israel and the Palestinians, which constitutes a crucial step in international efforts to actively support movement towards peace in the region. HAMAS, however, has since the mid-90s purposefully worked against all regional peace efforts by engaging in suicide attacks and other acts of the most violent type of terrorism. On June 8 and June 11 HAMAS took credit for attacks against Israelis. The organization also took credit for four suicide bombings in a 24-hour period during the weekend preceding May 20th.

On June 29th, HAMAS and two other designated terrorist groups announced a cease-fire. On August 19th, a suicide bomber detonated his bomb in the back of a double-length city bus near the border between east and west Jerusalem. According to a CNN report, HAMAS said that it was committed to the cease-fire, but also claimed responsibility, stating that "the man was a member of its military wing, the Izzedine al-Qassam Brigades, and the attack came in revenge for the killing of two of its members." As noted by the Human Rights Watch, "the Hamas leadership has pursued attacks against civilians as a conscious policy. A group that pursues multiple, intentional attacks against civilians as a matter of policy is responsible for crimes against humanity." Erased in a Moment: Suicide Bombing Attacks Against Israeli Civilians at 67 (October 2002).

Under Executive Order 13224, the United States government may block the assets of HAMAS (which it has done) and the assets of individuals and entities providing support, financial or otherwise, to designated terrorists and terrorist organizations. HAMAS has been designated as a Foreign Terrorist Organization (66 Fed. Reg. 51088) and as a Specially Designated Global Terrorist (SDGT) under Executive Order 13224, "Blocking Property and Prohibiting Transactions with Persons who Commit, or Support Terrorism."

The United States government has credible evidence that the following six are HAMAS leaders that command and control terrorist activity.

Sheik Ahmed YASSIN:

Yassin is the head of HAMAS in Gaza. He maintains a direct line of communication with other HAMAS leaders on coordination of HAMAS's military activities and openly admits that there is no distinguishing the political and military wings of Hamas. Yassin also conveys messages about operational planning to other Palestinian terrorist organizations.

Surrounding Yassin is an entourage of personal "bodyguards," including many implicated in providing information and supplies to fugitives, recruiting personnel to undertake military operations, planning terrorist cells, attacking settlements, and manufacturing

provides instructions to other parts of the HAMAS military wing.

Funds transferred from charitable donations to HAMAS for distribution to the families of Palestinian martyrs have been transferred to the bank account of Mishaal and used to support HAMAS military operations in Israel.

Musa Abu MARZOUK:

Musa Abu Marzouk is the Deputy Chief of HAMAS's Political Bureau based in Damascus, Syria. His activities include directing and coordinating terrorist acts by HAMAS against soldiers and civilians in Israel and the West Bank and Gaza. Marzouk maintains relationships with other terrorist organizations.

The Holy Land Foundation for Relief and Development, designated as an SDGT under EO 13224 in December 2001 based on its support of HAMAS, received funding and instructions from Marzouk. Mohamed Salah, designated as a Specially Designated Terrorist under Executive Order 12934 targeting those threatening the Middle East peace process, also received funding from Marzouk. Marzouk is implicated in receiving financing for HAMAS terrorist attacks, funds that have been used to mobilize military activity inside Israel and the West Bank/Gaza.

Abdel Aziz RANTISI:

Rantisi is part of the HAMAS leadership in Gaza, operating directly under HAMAS Leader Shaykh Yassin (see above) with whom he maintains a direct line of communication for the coordination of military operations. Mishaal (see above) has also issued orders for HAMAS terrorist activities through Rantisi.

In October of 2002, Rantisi was reported in Al-Hayat as personally claiming responsibility for the assassination of a Palestinian Authority Police Colonel. In December 2002, he was calling for Iraq to prepare thousands of martyrdom cells to fight the United States and its allies in the event of war.



weapons and explosives.

Imad Khalil AL-ALAMI:

Imad al-Alami is a member of HAMAS's Political Bureau, located in Damascus, Syria and a military operations leader. As part of HAMAS's external leadership, he is part of the most effective and powerful wing of HAMAS because it controls the West Bank and prison branches of HAMAS and has gained total financial control.

Al-Alami has had oversight responsibility for the military wing of HAMAS within the Palestinian territories. As a HAMAS military leader, al-Alami directs sending personnel and funding to the West Bank and Gaza.

Usama HAMDAN:

Hamdan, a senior HAMAS official based in Lebanon, maintains contact with representatives with other terrorist organizations with the purpose of strengthening the ties between these organizations in order to strengthen an international Islamic Jihad. He has worked with other HAMAS and Hizballah leaders on initiatives to develop and activate the military network inside the Palestinian territories in support of the current intifada, including the movement of weapons, explosives and personnel to the West Bank and Gaza for HAMAS fighters.

Funds transferred from charitable donations to HAMAS for distribution to the families of Palestinian "martyrs" have been transferred to the bank account of Hamdan and used to support HAMAS military operations in Israel.

Khalid MISHAAL:

Mishaal is the chief of HAMAS's Political Bureau in Damascus, Syria and heads HAMAS's Executive Committee and Special Office. Cells in the military wing based in the West Bank that are under Mishaal's control have been implicated in efforts by HAMAS to plan large attacks that would undermine the "road map" peace plan. Mishaal has been responsible for supervising assassination operations, bombings and the killing of Israeli settlers. To execute HAMAS military activities, Mishaal maintains a direct link to Gaza-based HAMAS leader, Abdel Aziz Rantisi (see below). He also

## HAMAS Fundraising

-----

HAMAS raises tens of millions of dollars per year throughout the world using charitable fundraising as cover. While HAMAS may provide money for legitimate charitable work, this work is a primary recruiting tool for the organization's militant causes. HAMAS relies on donations from Palestinian expatriates around the world and private benefactors located in moderate Arab states, Western Europe and North America. HAMAS uses a web of charities to facilitate funding and to funnel money. Charitable donations to non-governmental organizations are commingled, moved between charities in ways that hide the money trail, and then often diverted or siphoned to support terrorism.

The funds pouring into HAMAS coffers directly undermine the Middle East peace process. These funds allow the group to continue to foment violence, strengthen its terrorist infrastructure, and undermine responsible leadership.

The political leadership of HAMAS directs its terrorist networks just as they oversee their other activities. HAMAS leader Yassin confirms this relationship, stating to al-Sharq al-Awsat on August 12, 2002: "When we make decisions on the political level and convey them to the military wing, it abides by it normally." The intensity of this relationship is reflected in Yassin's words quoted by Reuters on May 12, 1998:

We cannot separate the wing from the body. If we do so, the body will not be able to fly. HAMAS is one body. A report issued by Human Rights Watch has also noted the unified nature of HAMAS:

In the case of Hamas, there is abundant evidence that the military wing is accountable to a political steering committee ... Yassin himself, as well as Salah Shehadah, the late founder and commander of the 'Izz al-Din al-Qassam Brigades, have confirmed in public remarks that the military wing implements policies that are set by the political wing." Erased in a Moment: Suicide Bombing Attacks Against Israeli Civilians at 63 (October 2002).

Fundraising may involve community solicitation in the United States, Canada, Europe and the Middle East or solicitations directly to wealthy donors. While some donors may be aware of the intended use of their donations, many innocent donors who intend for their money to be used to provide humanitarian services here or abroad, are unwittingly funding acts of violence when these funds are diverted to terrorist causes.

HAMAS fundraising directly undermines Prime Minister Mahmud Abbas's ability to clamp down on this terrorist organization. One of the obstacles and threats to establishing a meaningful dialogue toward peace comes from terrorist groups such as HAMAS, which view peace discussions as inimical to their interests and are intent on undermining the multilateral work on the roadmap by fomenting violence. In order to support momentum towards peace, to strengthen the ability of the new Palestinian leadership to take the actions it must take against HAMAS, the assets of groups like HAMAS must be frozen, as well as the assets of organizations raising funds for such terrorist groups.

E.O. 13224 provides a means to disrupt the financial-support network funding terrorist attacks committed by HAMAS. Under this Order, the United States government may block the assets of HAMAS (which it has done) and the assets of individuals and entities providing support, financial or otherwise, to designated terrorists and terrorist organizations. HAMAS has been designated as a Foreign Terrorist Organization (66 Fed. Reg. 51088) and as a Specially Designated Global Terrorist (SDGT) under Executive Order 13224, "Blocking Property and Prohibiting Transactions with Persons who Commit, or Support Terrorism."

The United States government has credible evidence that the following four organizations are part of a web of charities raising funds on behalf of HAMAS and using humanitarian purposes as a cover for acts that support HAMAS. Funds are generated by, and flow through, these organizations on behalf of HAMAS.

Commite de Bienfaisance et de Secours aux Palestiniens (CBSP) and Association de Secours Palestinien (ASP):

CBSP and ASP are primary fundraisers for HAMAS in France

and Switzerland, respectively. Founded in France in the late 80s/early 90s, CBSP acts in collaboration with more than a dozen humanitarian organizations based in different towns in the West Bank and Gaza and in Palestinian refugee camps in Jordan and Lebanon. ASP, a subsidiary of CBSP, was founded in Switzerland in 1994. The group has collected large amounts of money from mosques and Islamic centers, which it then transfers to sub-organizations of HAMAS.

Palestinian Relief and Development Fund (Interpal):

Interpal, headquartered in the UK, has been a principal charity utilized to hide the flow of money to HAMAS. Reporting indicates it is the conduit through which money flows to HAMAS from other charities, e.g., the Al Aqsa Foundation (designated under EO 13224 on May 29th) and oversees the activities of other charities. For example, the Sanabil Association for Relief and Development (designated as part of this tranche), represents Interpal in Lebanon. Reporting indicates that Interpal is the fundraising coordinator of HAMAS. This role is of the type that includes supervising activities of charities, developing new charities in targeted areas, instructing how funds should be transferred from one charity to another, and even determining public relations policy.

Palestinian Association in Austria (PVOE):

PVOE is controlled by the leader of HAMAS in Austria. The money is targeted to support members of HAMAS and is funneled through other charities in Lebanon, the West Bank and Gaza or other areas of the Middle East in order to ensure the transfer of funds is undetected and reaches its intended recipients. PVOE is part of the HAMAS network of charitable organizations that includes the Al Aqsa Foundation.

Sanabil Association for Relief and Development:

The Sanabil Association for Relief and Development (Sanabil), based in Sidon, Lebanon, receives large quantities of funds raised by major HAMAS-affiliated charities in Europe and the Middle East and, in turn, provides funding to HAMAS. For example, Sanabil has received funding from the Al Aqsa Foundation (designated under E.O. 13224 in May, 2003); the Holy Land Foundation

for Relief and Development (designated as an SDGT under EO 13224 in December 2001), and Interpal (designated as an SDGT under EO 13224 as part of this tranche). HAMAS recruits permanent members from the religious and the poor by extending charity to them from organizations such as Sanabil.

At the request of a HAMAS political leader, Sanabil began opening offices in all of the Palestinian refugee camps in Lebanon in August of 2001 in order to increase the foundation's role inside the camps. After starting by providing basic necessities the charity eventually began asking poor families within the camps to fill out application forms, particularly those who had worked with the Islamic Movement (Al-Haraka al-Islamiyya) and HAMAS. As a result of these efforts, Sanabil has increased its scope of influence within the camps.

I. NAME OF INDIVIDUAL TO BE DESIGNATED UNDER E.O. 13224

Shaykh 'Abd Al-Majid Al-Zindani

II. NAME OF ENTITY TO BE DESIGNATED UNDER E.O. 13224

Waldenberg, AG

Addresses:

(1) c/o Asat Trust Reg., Altenbach 8, 9490 Vaduz FL,  
Liechtenstein

(2) Via Posero, 2, 22060 Campione d'Italia, Italy

## TALKING POINTS:

-- The U.S. Government is preparing to designate and freeze the assets of Shaykh 'Abd Al-Majid Al-Zindani and of Walderberg, AG under U.S. Executive Order 13224 on terrorist financing.

-- A formal public announcement of these designations will be made on Monday, August 25.

-- On the same day, the U.S. Government will request the UN 1267 Sanctions Committee to include al Zindani and Waldenberg in its consolidated sanctions (asset freeze, travel ban, and arms embargo) list maintained pursuant to UNSCRs 1267, 1333 and 1390, as al Zindani is associated with Usama Bin Laden and the al Qaida organization, and Waldenberg is the successor organization to an entity already designated by the 1267 Committee because of its links to al Qaida.

-- We ask your government's support for the new U.S. designations. We hope that your government will undertake immediate and effective measures, similar to our own, to freeze the assets of al Zindani and Walderberg on August 25 or shortly thereafter.

-- We urge you to check carefully for offices or financial assets belonging to this individual and company in your country.

-- We hope that you will share with us any actions or blocking of assets that you undertake. In addition, we would welcome any information that you would like to share with us regarding the activities of this individual or this company in your country.

-- To avoid the flight of assets that might otherwise become subject to freezing, we urge you not to disclose publicly or privately the pending designation of al Zindani and Waldenberg, and to carefully restrict discussion and management of this issue until your opening of business on Monday, August 25.

-- We appreciate the close cooperation between our governments in this effort and your willingness to forego any public announcement or discussions of this action until after it is announced in the United States.

END TALKING POINTS

I. Background Paper on SHAYKH ABD-AL-MAJID AL-ZINDANI:  
-----

Shaykh Abd-al-Majid AL-ZINDANI

The United States government believes that Shaykh Abd-al-Majid AL-ZINDANI provides actual support for terrorism. The United States government has credible evidence that AL-ZINDANI supports designated terrorists and terrorist organizations, including al-Qa'ida. That information includes the following:

AL-ZINDANI has a long history of working with Usama bin Laden. He is publicly recognized to have been a spiritual leader to bin Laden. In this leadership capacity, he has been able to influence and support many terrorist causes. He actively recruited for al-Qa'ida training camps. Most recently, he played a key role in the purchase of weapons on behalf of al-Qa'ida and other terrorists.

AL-ZINDANI also served as a contact for the Kurdish-based group, Ansar al-Islam (AI), a terrorist organization linked to al-Qa'ida that is included in the UN 1267 sanctions Committee list. He is also a member of organizations that maintain a strong relationship with Hamas in Yemen, including adopting much of Hamas' ideology, advocating its support of violence, and facilitating the collection of donations for Hamas.

Shaykh Abd-al-Majid AL-ZINDANI is the founder and leader of the Al Iman University in Sanaa, which has over 5,000 students. Individuals who studied at Al Iman University are suspected of being responsible, and were arrested, for recent terrorist attacks, including the assassination of three American missionaries and the assassination of the number two leader for the Yemeni Socialist party, Jarallah Omar. John Walker Lindh was also a student at Al Iman University before he joined the Taliban.

The United States is therefore moving to designate Shaykh Abd-al-Majid AL-ZINDANI under E.O. 13224. Executive Order 13224 provides a means to disrupt the financial-support network funding terrorism. Under this order, the United States government may block the assets of individuals and entities providing supporting, financial or otherwise, to designated terrorists and terrorist organizations.

The Government of Yemen has undertaken a broad counterterrorism campaign against al-Qa'ida and publicly supports the international fight against terror. This action supports the Government of Yemen's ongoing efforts to combat terrorism by identifying and freezing the assets of a supporter of terror. As Prime Minister Abd-al-Qadir Ba-Jammal stated: "Acts of terrorism are part of a general plan by the terrorist groups to shake up the pillars of stability, and social peace, and undermine our higher national interests." He has cited several factors that contribute to the terrorist problem in Yemen, including the incitement, support and financial facilitation of terrorist causes and attacks.

## II. BACKGROUND PAPER ON WALDENBERG, AG:

### WALDENBERG, AG

Various sources indicate that Waldenberg, AG ("Waldenberg") is the successor organization of Al Taqwa Trade, Property and Industry Company Limited, formerly known as Himmat Establishment ("Himmat"), an entity previously named a Specially Designated Global Terrorist ("SDGT") on November 6, 2001, by the Secretary of the Treasury.

On April 17, 2003, Waldenberg sent separate letters to the Swiss government and the United Nations requesting a license to draw on the bank guarantee issued to Himmat by the BNP Paribas (Suisse) private bank, in order to pay certain legal fees and property taxes owed by Himmat. This assertion of entitlement to the guarantee issued to Himmat, coupled with the assumption of its debts, strongly suggests that Waldenberg is Himmat's alter ego and successor. Moreover, in both letters, Waldenberg states that it is the successor to the Himmat Establishment, Al Taqwa Trade, Property and Industry Establishment, and Al Taqwa Trade, Property and Industry Company, Limited. The Swiss Government has also referred to Waldenberg as the successor to Himmat in official correspondence with the United Nations..

Additionally, according to commercial reporting, Waldenberg's Board of Directors is comprised of two individuals, including Youssef Nada, an Specially



Designated Global Terrorist designated on November 6, 2001. Nada, who sat on Himmatt's Board of Directors, is identified in one of the April 17 letters as the primary contact for all correspondence related to Waldenberg's licensing application. Commercial reporting also indicates that Waldenberg's address is c/o Asat Trust Reg., Altenbach 8, 9490 Vaduz FL, Liechtenstein. This address is identical to that of Himmatt and Asat Trust, a Specially Designated Global Terrorist also designated on November 6, 2001. NOTE: Himmatt and Asat Trust were designated due to a controlling interest of Nada, an SDGT designated as acting for or on behalf of a name appearing in the Annex to E.O. 13224.

END BACKGROUND PAPERS

BEGIN LIST OF ADDITIONS TO THE DESIGNATION OF MUJAHEDIN-E KHALQ

Additions:

National Council of Resistance (NCR) (including its U.S. representative office and all other office worldwide).

National Council of Resistance of Iran (NCRI) (including its U.S. representative office and all other offices worldwide).

Clarifications:

PEOPLE'S MUJAHEDIN ORGANIZATION OF IRAN (including its U.S. representative office and all other offices worldwide).

END LIST OF ADDITIONS AND CLARIFICATIONS

## Talking Points

-- The international coalition to stem terrorist financing has been a joint effort involving many countries. Together, we are putting in place the necessary institutional and regulatory infrastructure to bar access to the financial system by terrorists and their supporters.

-- We have previously submitted to your government names of individuals and entities designated as terrorists or supporters of terrorism by the United States under U.S. Executive Order 13224.

-- We are now providing to you an amendment to one of those designations -- the addition of two aliases to and clarification of one alias in the designation of the Mujahedin-e Khalq, known as the MEK. The United States has designated and frozen the assets of MEK and its aliases and their offices.

-- The United States will not be submitting these names to the UN 1267 Sanctions Committee for inclusion on its consolidated list.

-- We would appreciate your government's taking swift measures to freeze the assets of these groups.

-- We hope you will let us know what actions to freeze the assets of these groups you undertake. In addition, we would welcome any information you may have regarding the activities of these or related groups/individuals.

-- We appreciate the close cooperation with your country in this effort.

END TALKING POINTS

## BACKGROUND PAPER

### DESIGNATION OF NATIONAL COUNCIL OF RESISTANCE AND NATIONAL COUNCIL OF RESISTANCE OF IRAN UNDER EXECUTIVE ORDER 13224

The Secretary of State has amended the designation, under Executive Order 13224 on terrorist financing, of the Mujahedin-e Khalq, known as the MEK, to add its aliases National Council of Resistance (NCR) and National Council of Resistance of Iran (NCRI) and their U.S. representative offices and all other offices worldwide and that the designation of the People's Mujahedin of Iran ("PMOI") as an alias of the MEK includes the PMOI's U.S. representative office and all other offices worldwide.

The Secretary of State designated the MEK as a foreign terrorist organization in 1997, and again in 2001 pursuant to section 1(b) of Executive Order 13224, which (as amended) authorizes the Secretary to designate foreign entities and individuals that he determines - in consultation with the Secretary of the Treasury, the Attorney General, and the Secretary of Homeland Security - to have committed, or to pose a significant risk of committing, acts of terrorism that threaten the security of U.S. nationals or the national security, foreign policy, or economy of the United States.

The action to amend the Executive Order 13224 designation of the MEK to include NCR and NCRI is based on information from a variety of sources that those entities functioned as part of the MEK and have supported the MEK's acts of terrorism.

END BACKGROUND PAPER