



Bangko Sentral ng Pilipinas

**OFFICE OF THE DEPUTY GOVERNOR
SUPERVISION AND EXAMINATION SECTOR**

CIRCULAR LETTER

**To : All Banks and Non-Bank Financial Institutions
under BSP Supervision**

The Anti-Money Laundering Council (AMLC), in its Resolution No. 419 dated 5 October 2004, copy attached, enjoins your support and cooperation to the request of the United States Government, thru its Embassy in Manila, to check carefully for offices or financial assets belonging to the following:

- a. Al-Haramain Islamic Foundation (AHF)
- b. Suliman Al-Buthe, Director of the US Branch of the Al-Haramain Islamic Foundation

and to freeze the same should any be found.

They are suspected of engaging in activities on behalf of and in support of the Al-Qaida.

Pursuant to said resolution, you are hereby directed to submit directly to the AMLC reports of covered and suspicious transactions, if any, involving the Al-Haramain Foundation and Mr. Suliman Al-Buthe.

For your strict compliance.


ALBERTO V. REYES
Deputy Governor

Att.: A/S

20 Oct, 2004



PANANALAPING MATATAG, BANSANG PANATAG



Anti-Money Laundering Council

Bangko Sentral ng Pilipinas Complex
Manila, Philippines

RESOLUTION NO. 419

The Al-Haramain Islamic Foundation (AHF) represents itself as a private, charitable and educational organization dedicated to promoting Islamic teaching throughout the world. The Saudi Arabia based Al-Haramain Islamic Foundation (AHF) branch offices in Indonesia, Kenya, Tanzania and Pakistan had already been subject of Resolution No. 344 dated 22 March 2004 by the Anti-Money Laundering Council (AMLC).

On 20 September 2004, the Government of the United States, through its Embassy in Manila, sent a letter dated 10 September 2004 addressed to Hon. Rafael B. Buenaventura, Governor, Bangko Sentral ng Pilipinas, regarding its request to check carefully for offices or financial assets belonging to the Al-Haramain Islamic Foundation (AHF) and Suliman Al-Buthe, director of the US branch of the Al-Haramain Islamic Foundation, and to freeze the same should any be found.

Suliman Al-Buthe and Pete Seda formally established the US-based branch of AHF in 1997. Aqeel Abdul Aziz Al-Aqil, the former director of AHF, signed documents naming Al-Buthe as the organization's attorney and providing him with broad legal authority. The US and UN 1267 Sanctions Committee have since designated Al-Aqil, because under his oversight, branches of AHF were being used to support Al-Qaida.

Pursuant to his authority under US Executive Order 13224, President George Bush, on 9 September 2004, designated domestically and froze the assets of Al-Haramain Islamic Foundation branch offices in the United States (Ashland, Oregon and Springfield, Missouri), a branch of the Foundation in the Union of the Comoros and Suliman Al-Buthe, director of the US branch of the Foundation, for engaging in activities on behalf of and in support of Al-Qaida. On even date, United States requested the UN 1267 Sanctions Committee to add the names of the aforesaid branch offices and director to the consolidated list of entities/individuals subject to sanctions that UN member states are required to implement pursuant to relevant UNSC Resolutions, including 1267 and subsequent resolutions.

Information available to the US indicates that support efforts provided by AHF as a worldwide organization in Chechnya were directed towards Mujahideen, as well as Chechen leaders affiliated with the Al Qaida network. Additional information shows that some funds sent by AHF as a worldwide organization may have been used to purchase weapons and military equipment. Other investigations have shown direct ties between the US branch and senior officials of Al Qaida, Usama bin Laden; and other individuals or entities designated by the US and/or the 1267 Committee. Information available to the US also shows that AHF in the US provided funding to a US based Imam who attended a Lashkar e-Tayyiba (LET)-run terrorist training camp. The LET organization has been designated as a Specially Designated Global Terrorist pursuant to the

authorities of EO 13224 and as a Foreign Terrorist Organization in accordance with section 219 of the Immigration and Naturalization Act.

The provisions of the United Nations Security Council Resolution (UNSCR) 1373 require UN member states to freeze terrorist assets without delay and to prohibit their nationals or persons in their territories from financing terrorism. As a charter member of the United Nations and as part of the international coalition against terrorism, the Philippines, through the Anti-Money Laundering Council, must actively support the actions required under the subject UNSCR Resolutions.

Pursuant thereto, the Council unanimously resolves, as follows:

- (1) To require the Supervising Authorities, the Bangko Sentral ng Pilipinas, the Securities and Exchange Commission, and the Insurance Commission to circularize among all covered institutions under their respective jurisdictions, copy of this Resolution; and
- (2) To direct the covered institutions to submit directly to the Council reports of covered or suspicious transactions, if any, involving the Al-Haramain Islamic Foundation and Suliman Al-Buthe in accordance with Section 7 and 9 of the AMLA, as amended and Rule 9.3 of the Revised Implementing Rules and Regulations and other related or applicable rules, regulations, circulars and operating manuals promulgated by the Supervising Authorities.

5 October 2004, Manila, Philippines.



ARMANDO L. SURATOS

Acting Chairman

(Officer-In-Charge, Bangko Sentral ng Pilipinas)



DE B. BARIN

Member

(Chairman, Securities and Exchange Commission)



BENJAMIN S. SANTOS

Member

(Commissioner, Insurance Commission)