



An investigation into the allegations of the Global Initiative against Transnational Organized Crime report concerning Somali MTBs based in Bosaso

Licensing & Supervision Department,
Monetary, Financial & Regulatory Policy Group

CENTRAL BANK OF SOMALIA

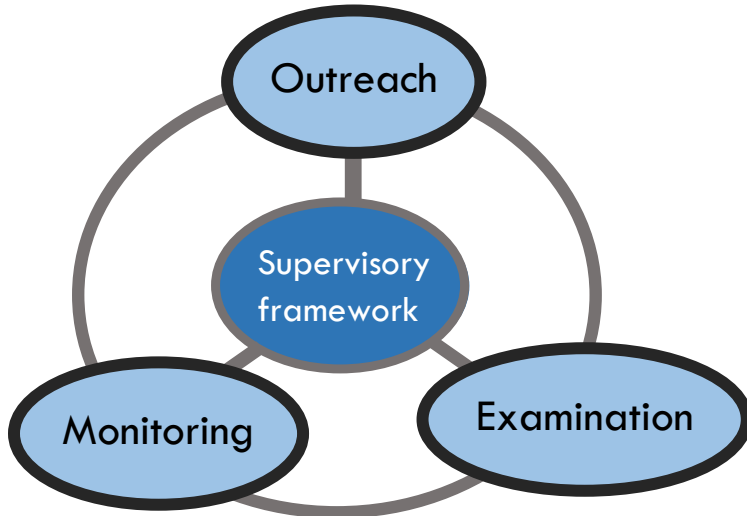
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Abbreviations

ACCPA	Association of Certified Compliance Professionals in Africa
AML	Anti-Money Laundering
CBS	Central Bank of Somalia
CFT	Countering Financing of Terrorism
FATF	Financial Action Task Force
FRC	Financial Reporting Center
FSVC	Financial Services Volunteer Corps
GI-TOC	Global Initiative against Transnational Organized Crime
IMF	International Monetary Fund
LSD	Licensing & Supervision Department of CBS
MFRPG	Monetary, Financial & Regulatory Policy Group of CBS
MTB	Money Transfer Business
SRA	Somali Remittance Association
UN	United Nations
WB	World Bank

Foreword



The vision of the Central Bank of Somalia (CBS) is to contribute to the prosperity of the people of Somalia through maintaining economic, price and financial system stability in order to support sustainable economic growth. It is through this vision that CBS routinely conducts on-site and off-site examinations and the monitoring of commercial banks and non-bank financial institutions, such as Money Transfer Businesses (MTBs).

As of March 2021, there are 10 licensed MTBs operating in Somalia. To foster a sound financial

sector, the CBS utilizes a three-level supervisory framework. First, the Licensing and Supervision Department (LSD) of CBS conducts periodic financial sector outreach activities, which are aimed at promoting adherence to existing financial sector regulations and laws through information sharing, training, stakeholder consultations and the issuance of industry guidelines. Second, the LSD performs routine risk-based examinations to ensure adherence to financial sector laws and regulations. Finally, the team monitors and analyses industry practices and trends through regular reporting requirements and follow ups.

In September 2020, the Global Initiative against Transnational Organized Crime (GI-TOC) published a report entitled: “*The use of the hawala remittance system in the Yemen-Somalia arms trade*”. The report alleges that four MTBs based in Bosaso, Puntland region of Somalia, were used by six major arms dealers (or their proxies) based in Yemen and Somalia.

Between the 8th and 22nd of October 2020, the Central Bank of Somalia sent a team of experienced examiners to Bosaso for a special inspection to verify the allegations of the GI-TOC report. This report details the process followed by the CBS team and its findings. Also, the report identifies a number of lessons and recommendations.

The CBS would like to thank the Financial Services Volunteer Corps (FSVC), the Somali Remittance Association (SRA) and the management of the State Bank of Puntland for their support during this special investigation.

Licensing & Supervision Department
Monetary, Financial & Regulatory Policy Group,
Central Bank of Somalia.

1. Executive Summary

In September 2020, the Global Initiative against Transnational Organized Crime (GI-TOC) published a report on arms trafficking between Yemen and Somalia. In tracing alleged transactions related to the United Nations (UN) arms embargo, the GI-TOC report focused on four money transfer businesses (MTBs) based in Bosaso, the North-Eastern region of Somalia.

Bosaso is a major business center and is well connected to the Arabian Peninsula, specifically Yemen, the United Arab Emirates and Oman since pre-historic times. Bosaso's main exports are livestock and frankincense. Having these trade connections makes Bosaso an integral trade partner with the other side of the Red Sea.

The GI-TOC report named four Bosaso based MTBs that are alleged to have been used for possible money laundering, terrorist financing and illicit arms trafficking. The four MTBs are Bosaso branches belonging to Dahabshiil Money Transfer, Amal Express, Taaj Money Transfer, and Iftin Express.

The Central Bank of Somalia (CBS), as the supervisory and regulatory authority of MTBs operating in Somalia, takes the issues raised by the GI-TOC report seriously. To this end, it tasked its Licensing and Supervision team (henceforth 'audit team') to investigate the allegations of the GI-TOC report. The team was supported and accompanied by a Senior AML/CFT Advisor from the Financial Services Volunteer Corps (FSVC). The team's purpose was to ascertain whether the above-mentioned MTBs violated Somalia's AML/CFT law and/or any of CBS' regulations.

The CBS auditors focused on 18 transactions taken from the GI-TOC report (see Annex 1 for further details) plus two receipts published in the report. The CBS auditors collected additional data for the whole month in which an alleged transaction was supposed to have occurred, according to the GI-TOC report. For example, if the GI-TOC report mentions – say, 10th December 2018, then the team would scrutinize all transactions for the whole month of December 2018 using specific search parameters (see the methodology section below). Finally, the search covered five years of transactions, as per local and international AML/CFT requirements, including but not limited to the Financial Actions Task Force (FATF) and the AML/CFT law of Somalia.

In essence, the CBS auditors did not find any evidence of UN sanctions list violations during the investigation.

The rest of the report is structured as follows. The next section sets out the scope of the report. Section 3 presents the audit team members. Section 4 describes the auditing methodology. Section 5 discusses the findings while Section 6 concludes and makes recommendations.

2. Scope of the report

The scope of the CBS team audit was to uncover whether any of the MTBs violated the AML/CFT laws of Somalia and/or any of CBS’ regulations. The team investigated:

- Eighteen transactions identified by the GI-TOC report (see Annex 1). These transactions do not always have transaction numbers, or the name of the MTB used but contain names, destination, dates, and amounts. As a result, these transactions were searched on the systems of all four MTBs using the records of the last five years.

The CBS team also verified any other clues that may be connected to the cases being investigated or other potentially unreported cases. These clues were cross-checked against all traceable demographic information gleaned from the databases of the MTBs during the investigation.

3. Audit team

The CBS audit team composed of four trained CBS LSD staff. These members of staff were chosen based on their expertise in non-banking financial institutions such as MTBs. The average member of the team had about 9 years of related experience in AML/CFT, MTB supervision and examination, internal control, and risk management. All members of the team received significant training from, among others, the International Monetary Fund, the World Bank, and the FSVC. Finally, half of the team were ACCPA certified (Association of Certified Compliance Professionals in Africa). The audit team was supported and accompanied by a **Senior FSVC Advisor**.

Audit team members

Abdulkadir Abdi Ali	Team lead – Non-Banking Sector
Ahmed Abukar Ahmed	Team Lead – MTB
Abdullahi Ali Abdi	AML Lead – Non-Banking Sector
Bashir Abdi Hersi	Lead Interviewer/ investigator

The CBS audit team was thoroughly briefed on the scope of the investigation. Before the audit, the CBS team prudently prepared themselves by; 1) scrutinizing the content of the GI-TOC report, 2) completing mock

MTB examinations, which included potential scenarios they may encounter during their investigations, and 3) conducting a desk-based review of CBS monthly/quarterly reports/data from the concerned MTBs, including previous compliance levels and any outstanding corrective actions ensuring the team had a holistic picture of the state of each of the MTBs concerned.

Prior to the audit, the team convened three technical meetings chaired by the Executive Director of the MFRPG of the CBS to go through all the key aspects of the planned audit. The team also attended one high-level meeting chaired by the Governor of the CBS.

Separately, the Senior Management of CBS organized a meeting on the 3rd of October 2020, attended by the Financial Reporting Center (FRC), the Somali Remittance Association (SRA) and the Senior Management of the four MTBs named by the GI-TOC report (Dahabshiil, Amal, Iftin and Taaj). The main purpose of the meeting was to discuss the allegations of the GI-TOC report. The outcome of this meeting was, among other things, that there should be three separate investigations by the CBS, FRC and the SRA in cooperation with the concerned MTBs to confirm the claims of the GI-TOC report. It was important for all the parties concerned that independent investigations should be done separately so as to achieve impartiality.

4. Audit methodology

The supervisory team allocated two days to audit each MTB. The CBS team invited the managers, compliance officers, and significant MTB stakeholders to participate in the fact-finding process. The CBS team selected controlled search parameters to conduct an in-depth auditing of the MTBs based on the GI-TOC report. The search was based on the last five years' transactions, as per local and international AML/CFT laws, including but not limited to the financial actions task force (FATF) and the AML/CFT law of Somalia. The audit is mostly limited to transactions between the Bosaso region of Somalia and Yemen, unless the team was tracing something related in other regions.

The CBS team prepared an audit work plan and an execution management guideline. Each MTB was given a set of requirements in advance of the audit. These requirements included the presence of senior management, a senior compliance officer, the Bosaso branch manager, and other personnel whose presence will be significant to the audit process. Another requirement of the CBS auditors was the availability of all transactions of the last five years, whether in archive or online (system). A senior IT manager was required to be present to resolve any glitches in the system that might impede the auditing process.

The first search targeted the date of the suspected transactions to find the person/persons of interest. Depending on the search criteria required, specific data was extracted from online/system or retrieved from the archive. The data included: the transaction number, sender name (with similar names search capability), the receiver's name (with similar names search capability), the telephone number, or a combination of all mentioned requirements. Finally, the month of the suspected transaction was dumped into an excel sheet for further analysis by the CBS team. Remittances between Bosaso and Yemen were thoroughly searched for any matches of the GI-TOC reported transactions.

The CBS team also verified the teller security privileges to ensure that a teller cannot send money from other cities outside Bosaso. It was found that the investigated MTBs had granted sufficient privileges to each user, commensurate to his/her role in the MTBs' day-to-day business operations.

While analyzing the targeted month data, the CBS team filtered the data by sender name, receiver name, transaction date, amount sent, and any other data field that can provide additional information to the audit team.

The audit team also visited the tellers to check how they send money. For example, the CBS team requested the teller to send money to someone the team knew was on the UN sanctions list to validate if the system accepts or not. They visited all four MTBs and validated whether the system rejected when the names match 100%, 80% or 75%, respectively, or whether such transaction was referred to the compliance officer for further investigation.

The Iftin Express team found that their computer privileges were not sufficient to generate the requested data. Thus, the audit was stopped, and the CBS team requested the presence of someone with sufficient privileges to retrieve the requested data from the system. Subsequently, Iftin Express requested to reschedule the audit for the manager and the IT consultant to be present. The request was granted, and the audit resumed when the manager and IT consultant arrived from Dubai, UAE.

The CBS audit team asked targeted questions when examining each MTB. The team also retrieved data for the complete month in which a given transaction took place for further analyses. The audit team also cross-checked the findings from one MTB with the other MTB records they examined and sometimes re-visited previously audited MTB for further investigation after finding clues that needed additional scrutiny or verification.

5. Audit findings

As mentioned in the methodology section, the investigation of the four MTBs was based on accessing the online/systems of the MTBs and retrieving data from their archives. Also, as mentioned in Section 2, the audit team had details on 18 suspicious transactions reported by the GI-TOC report (see Annex 1 for further details on these transactions). The audit team utilized a two-level investigative approach. In the first instance, the team accessed the (online) system of each MTB to verify the alleged transaction(s) or find the person/persons of interest. In the second stage, the team would collect and thoroughly analyze data for the whole month in which the reported transaction is alleged to have occurred. In what follows, we summarize the findings of the audit process.

MTB 1: Amal Express audit results

According to the GI-TOC report, a man named Abdirahman Mohamed Omar (aka Dhofaye), a UN identified arms dealer, used Amal Express on October 19th, 2019 (see Annex 1).

- The team did not find any transactions for the whole month of October 2019 sent by Abdirahman Mohamed Omar (aka Dhofaye) to Abdirab Salim Al-Baydani (Al-Hayashi) using Amal Express Bosaso branch. Abdirab Salim Al-Baydani (Al-Hayashi) has been on the UN sanctions list since October 25, 2018.
- The CBS auditors found a similar name, Abdirahman Mohamed Omar, and after requesting his identity and telephone numbers in Amal's records, the CBS team confirmed that this individual is a different person with the same name. Crucially, this individual did not send any remittance to Yemen or to Mr Al-Baydani (Al-Hayashi) anytime over the past 5 years.
- The names and proxies mentioned in the GI-TOC report; or persons in any sanctions list were not found in the Amal Express' systems or its archives.
- The CBS audit team compared the Amal receipt published in the GI-TOC report against Amal Express' paper and electronic receipts of the same month. After scanning the Quick Response (QR code) on the GI-TOC's receipt, it displays this website: www.pw2.it. However, when Amal's receipt retrieved from their records was scanned, the QR code displayed the customer details, matching the content of the details within the Amal receipt (see Annex 2 for details). This indicates that the Amal receipt published in the GI-TOC report may not be genuine.

To summarize: The CBS audit team’s investigation concludes that the claims in the GI-TOC report were unverifiable. There was not any evidence showing that Amal Express was used by Abdirahman Mohamed Omar (aka Dhofaye) anytime over the past 5 years. The Amal Express receipt published in the GI-TOC report was inconsistent with the official Amal Express receipts (both paper and electronic) of the same period.

Amal Express representatives present

Role/ Profession within Amal Express
Treasurer
Manager
Regional compliance officer
Division Manager
Sr. Compliance officer
Bossaso operations
IT manager
SRA Secretary General

MTB 2: Iftin Express audit results

The CBS team, supported by the FSVC senior advisor, started the auditing of Iftin Express on October 10th, 2020. Due to the absence of the MTB CEO and IT expert, the Iftin Express audit resumed when these individuals arrived from Dubai at the CBS team’s request. According to the GI-TOC report, a man named Abdirahman Mohamed Omar (aka Dhofaye), a UN identified arms dealer, used Iftin Express in March 2020 (see Annex 1).

- The team did not find any evidence that Abdirahman Mohamed Omar (aka Dhofaye) sent money to Abdiraba Abdirab Salim Al-Baydani (Al-Hayashi), who was based in Mukala, Yemen, as alleged by the GI-TOC report.
- GI-TOC contained a receipt claimed to be from Iftin Express Bosaso. The sender on the receipt was Abdirahman Mohamed Omer, and the receiver is Abdiraba Abdirab Salim Al-Baydani (Al-Hayashi) based in Mukala, Yemen. The receipt in the GI-TOC report had a website at the top right of corner: (<http://www.iftinuk/sendmoney/receivemoneyworldwide>) when this link was clicked, it displayed a “website not found” message. The Iftin Express receipt validated during the audit, www.iftinonline.com, displays Iftin’s login page.
- The layout of the verified Iftin Express receipt dated March 02, 2020, and the GI-TOC reported receipt, dated March 02, 2020, are different. The contents of the two receipts are also different

(see Annex- 3 for details). This indicates that the Iftin receipt published in the GI-TOC report may not be genuine.

To summarize: The CBS audit team concludes that the claims made in the GI-TOC report that Abdirahman Mohamed Omar (aka Dhofaye) sent money to Abdiraba Abdirab Salim Al-Baydani (Al-Hayashi) anytime over the past 5 years using Iftin Express are without evidence. The Iftin Express receipts published in the GI-TOC report were found to be inconsistent with the official Iftin Express receipts (both paper and electronic) of the same period.

Iftin Express representatives present

Role/ Profession within Iftin Express
IT Manager
Manager
Compliance officer
Bosaso Branch manager
SRA Secretary General

MTB 3: Taaj Money Transfer audit results

According to the GI-TOC report, Abdirahman Mohamed Omar (aka Dhofaye), a UN identified arms dealer, and Khalil or Dalil Abdow Muqbil (a proxy of Abdiraba Abdirab Salim Al-Baydani [Al-Hayashi]) allegedly used Taaj Money Transfer. The CBS audit team found the following:

- The GI-TOC report claimed that Abdirahman Mohamed Omar (aka Dhofaye) sent money to Khalil or Dalil Abdow Muqbil (a proxy of Abdiraba Abdirab Salim Al-Baydani [Al-Hayashi]). The CBS team found no evidence to substantiate this allegation. However, the team uncovered the following:
 - i. An individual not mentioned in the GI-TOC report did send three transactions to Khalil Abdow Muqbil Al Kaamil. These transactions occurred in June and July 2016, respectively (See Annex 5 for details). All three transactions originated from Bosaso and were received by Khalil Abdow Muqbil Al Kaamil in Sanaa, Yemen. The sender was not identified in the GI-TOC report but was uncovered by the CBS team. However, both the person who sent the money and Khalil or Dalil Abdow Muqbil are not on any UN sanctions list at the time of writing this report.

To summarize: The CBS audit team concludes there is no evidence to verify the claims made in the GI-TOC report that Abdirahman Mohamed Omar (aka Dhofaye) sent money to Abdiraba Abdirab Salim Al-

Baydani (Al-Hayashi) anytime over the past 5 years using Taaj Money Transfer. The CBS audit team did not find any evidence that Abdirahman Mohamed Omar (aka Dhofaye) sent money to Khalil or Dalil Abdow Muqbil (an alleged proxy of Abdulraba Abdulrab Salim Al-Baydani [Al-Hayashi]). However, Khalil or Dalil Abdow Muqbil did receive three separate remittances from an individual not named in the GI-TOC report during June/July 2016. Both these individuals are not on any UN sanctions list.

Taaj Money Transfer representatives present

Role/ Profession within Taaj Money Transfer
Taaj – Puntland region CEO
IT Manager – Puntland
Internal Audit – Puntland
Board Consultant
Compliance Officer
SRA Secretary General

MTB 4: Dahabshiiil Money Transfer audit results

According to the GI-TOC report, Abdirahman Mohamed Omar (aka Dhofaye), a UN identified arms dealer, remitted money to two individuals – namely, Abdiraba Abdirab Salim Al-Baydani (Al-Hayashi) and Bashir Naji Abdullahi Shujac.

The CBS audit team found the following in relation to Dahabshiiil Money Transfer, Bosaso branch:

- In January 2018, Abdirahman Mohamed Omar (aka Dhofaye) was found to have remitted USD 49,800.00 to Bashir Naji Abdullahi Shujac, who was based in Mukala, Yemen. However, Mr Shujac is not on the UN sanctions list at the time of writing this report (See Annex 4 for details).
- On the 25th of May 2017, Abdirahman Mohamed Omar (aka Dhofaye) sent USD 1,000.00 to a man not mentioned in the GI-TOC report but was uncovered by the CBS team.
- On the 30th of December 2017, Abdirahman Mohamed Omar (aka Dhofaye) sent USD 997.00 to another individual not mentioned in the GI-TOC report but was uncovered by the CBS team (See Annex 5 for details).

To summarize: The CBS audit team did find evidence showing that Abdirahman Mohamed Omar (aka Dhofaye) remitted USD 49,800.00 to Mr Shujac in January 2018. Crucially, Mr Shujac is not on the UN sanctions list at the time of writing this report. A number of other small transactions, not

mentioned in the GI-TOC report, were uncovered by the CBS team but these involved amounts below the reporting threshold and/or individuals that are not on the UN sanctions list.

Dahabshiil Money Transfer representatives present

Role/ Profession within Dahabshiil Money Transfer
Compliance Manager 1
Auditor
Bosaso Manager
South and Central Compliance Lead
Compliance Manager 2
SRA Secretary General

6. Conclusions

The CBS audit team did not find any evidence of UN sanctions list violations by the four MTBs mentioned in the GI-TOC report. More specifically, none of the senders or recipients of the funds were on any UN sanctions list at the time of the transactions. Crucially, the alleged receipts published in the GI-TOC report are inconsistent with the official MTBs receipts (both paper and electronic) of the same period, suggesting that they may not be genuine.

The CBS audit team found that the four MTBs investigated maintain adequate records consistent with local and international AML/CFT requirements. Also, it is clear from the audit that the four MTBs applied acceptable simplified know your customer (KYC) and due diligence procedures. Therefore, the allegations of the GI-TOC report that:

- there are “widespread gaps in anti-money laundering/countering the financing of terrorism (AML/CFT) controls, including the principle of ‘know your customer’ (KYC)” is not warranted, according to the CBS’ thorough audit.
- there is a “climate of loose or non-existent oversight” is not consistent with the realities on the ground for the following main reason; the CBS routinely conducts on-site examinations to check if there are unreported suspicious transaction report (STR) or cash threshold report (CTR) violations. Also, the LSD team conducts off-site monthly and quarterly examinations to closely monitor the inflows and outflows of funds through the MTB sector. In the event of any violations, the CBS LSD team issues appropriate corrective actions and directives and these are properly enforced.

Nonetheless, the CBS audit team found that there is scope for improvement in relation to KYC and customer due diligence. To this end, the CBS audit team makes the following recommendations:

- The sector should empower compliance officers and regional managers of MTBs to ensure full compliance with existing laws and regulations as well as international best practices. To kickstart this process, the LSD organized a one-day workshop on the 28th of December 2020 involving key MTB stakeholders (owners/shareholders, CEOs and other senior management). This workshop was chaired by the Governor of the CBS. The LSD plans to hold similar sessions specifically targeted at compliance officers in the near future.
- The LSD, assisted by FSVC, should provide new training sessions for the compliance officers and the tellers of MTBs operating in Bosaso and other regions where AML/CFT training was not conducted in the past. Between the 19th and 25th of January 2021, the CBS conducted AML/CFT training for MTBs based in Bosaso and the wider region to strengthen the sector's knowledge on AML/CFT. These sessions were attended by 70 MTB front-line officers, managers, and compliance officers. The CBS team was supported by FSVC.
- The CBS should work with relevant authorities to close any unregulated MTBs operating illegally within Somalia. The LSD team will draft a plan of action in relation to unregulated MTBs by the second quarter of 2021. In addition, the LSD team is working closely with the Office of the Attorney General to track unlicensed MTBs so that these can be prosecuted.
- The CBS Board of Directors should endorse new penalty regulations in relation to weak compliance. The LSD will work with the Board's sub-committee on licensing and supervision to consider this issue and other related matters.
- The CBS should strengthen its cooperation with the FRC, which is the national agency responsible for receiving, requesting, analyzing, and appropriately disseminating information concerning AML/CFT issues in Somalia. Through closer cooperation, the reporting of STR and CTR to the FRC by financial institutions will be further strengthened. To initiate this process, the CBS Legal Unit is currently collaborating with their counterparts at FRC to finalize a memorandum of understanding (MoU). This MoU along with planned regular technical meetings between the two organizations will strengthen AML/CFT compliance across the financial sector in Somalia. Finally, CBS, in collaboration with financial institutions, will soon launch a digital customer verification system (CVS) for the financial sector to facilitate effective use of electronic KYC (eKYC) practices to help

improve financial integrity. This transformative initiative is being financially supported by the World Bank.

Taken together, the above recommendations and initiatives will significantly strengthen AML/CFT compliance across the financial sector in Somalia. It should be emphasized that Somalia has come a long way in AML/CFT controls due to the support of its international partners including the European Union, FSVC and World Bank.

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March 2021

Annex 1: Transactions extracted from the GI-TOC report

MTB Name	Transaction No	Date	Sender	Receiver	Amount	Audit Findings
N/A	N/A	18-Dec-17	Abdirahman Mohamed Omer (aka 'Dhofaye')	Bashir Naaji Abdullahi Shujac (Al-Hayashi's proxy)	\$2,991	The sender, the receiver, and the amount were not found in December 2017 transactions
N/A	N/A	25-Dec-17	Abdirahman Mohamed Omer (aka 'Dhofaye')	Bashir Naaji Abdullahi Shujac (Al-Hayashi's proxy)	\$7,970	The sender, the receiver, and the amount were not found in December 2017 transactions
N/A	N/A	26-Dec-17	Abdirahman Mohamed Omer (aka 'Dhofaye')	Bashir Naaji Abdullahi Shujac (Al-Hayashi's proxy)	\$39,840	The sender, the receiver, and the amount were not found in December 2017 transactions
N/A	N/A	01-Jan-18	Abdirahman Mohamed Omer (aka 'Dhofaye')	Bashir Naaji Abdullahi Shujac (Al-Hayashi's proxy)	\$11,960	The sender, the receiver, and the amount were not found in January 2018 transactions
N/A	N/A	04-Jan-18	Abdirahman Mohamed Omer (aka 'Dhofaye')	Bashir Naaji Abdullahi Shujac (Al-Hayashi's proxy)	\$9,970	The sender, the receiver, and the amount were not found in January 2018 transactions
N/A	N/A	13-Jan-18	Abdirahman Mohamed Omer (aka 'Dhofaye')	Bashir Naaji Abdullahi Shujac (Al-Hayashi's proxy)	\$8,960	The sender, the receiver, and the amount were not found in January 2018 transactions
N/A	N/A	16-Jan-18	Abdirahman Mohamed Omer (aka 'Dhofaye')	Bashir Naaji Abdullahi Shujac (Al-Hayashi's proxy)	\$49,800	The sender, the receiver, and the amount were found in January 2018 transactions.

N/A	N/A	24-Jan-18	Abdirahman Mohamed Omer (aka 'Dhofaye')	Bashir Naaji Abdullahi Shujac (Al-Hayashi's proxy)	\$9,950	The sender, the receiver, and the amount were not found in January 2018 transactions
N/A	N/A	27-Jan-18	Abdirahman Mohamed Omer (aka 'Dhofaye')	Bashir Naaji Abdullahi Shujac (Al-Hayashi's proxy)	\$30,000	The sender, the receiver, and the amount were not found in January 2018 transactions
N/A	N/A	29-Jan-18	Abdirahman Mohamed Omer (aka 'Dhofaye')	Bashir Naaji Abdullahi Shujac (Al-Hayashi's proxy)	\$10,000	The sender, the receiver, and the amount were not found in January 2018 transactions
N/A	N/A	30-Jan-18	Abdirahman Mohamed Omer (aka 'Dhofaye')	Bashir Naaji Abdullahi Shujac (Al-Hayashi's proxy)	\$19,940	The sender, the receiver, and the amount were not found in January 2018 transactions
N/A	N/A	05-Feb-18	Abdirahman Mohamed Omer (aka 'Dhofaye')	Bashir Naaji Abdullahi Shujac (Al-Hayashi's proxy)	\$42,300	The sender, the receiver, and the amount were not found in February 2018 transactions
N/A	N/A	21-May-19	Aadam Mohamed Abdulle (a proxy for Mahad Isse, aka 'Laboballe')	Daliil [sic] Muqbil Abdo (Proxy between Bashir Shujac and Sayf Al-Hayashi)	\$29,000	The sender, the receiver, and the amount were not found in May 2019 transaction
N/A	N/A	Jun-19	Abdirahman Mohamed Omer (aka 'Dhofaye')	Jabir Al-Haadi (Proxy between Bashir Shujac and Sayf Al-Hayashi)	\$10,094	The sender, the receiver, and the amount were not found in June 2019 transactions
N/A	N/A	11-Sep-19	Abdirahman Mohamed Omer (aka 'Dhofaye')	Khaliil Abdow Muqbil (Proxy between Bashir Shujac and Sayf Al-Hayashi)	\$16,050	The sender, the receiver, and the amount were not found in September 2019 transactions
Amal Express	N/A	Oct-19	Abdirahman Mohamed Omer (aka 'Dhofaye')	Abdirabi Abdirabi Salim Al Baydani (Al-Hayashi)	\$19,546	The transaction number and the amount were not found in October 2019 transactions
N/A	N/A	21-Nov-19	Mohamed Rashiid Hussein (a proxy for Mahad Isse, aka 'Laboballe')	Khaliil Abdow Muqbil (Proxy between Bashir Shujac and Sayf Al-Hayashi)	\$10,100	The sender, the receiver, and the amount were not found in November 2019 transactions
Iftin Express	N/A	Mar-20	Abdirahman Mohamed Omer (aka 'Dhofaye')	Abdiraba Abdirab Salim (Al-Hayashi)	\$18,900	The transaction number and the amount were not found in March 2020 transactions

Annex 2: Amal Express receipt compared with GI-TOC receipt

Amal Receipt showing detailed information

AMAL EXPRESS
Reliable Money Transfer

BOSASO_XARUNTA_HQ
Amal Bosaso, LandMark (Amal Bosaso/Bosaso, Ph.252-05825033)

2018 Receipt

Sender Details		Receiver Details		Transaction Details	
Name	YU: [REDACTED] BO	Name	Muhammad Yusuf	Tran Id	SO20 [REDACTED]
Mobile	25 [REDACTED]	Mobile	[REDACTED]	Date	2018-09-01
Address	B, SOMALIA	Address	[REDACTED]	Mode	Cash
Receiver Remarks		FDALAN SHYA		Purpose	Humanitarian Support
I certify that I am transmitting funds on my behalf or on behalf of entity for which I am providing identification of affiliation, that the information I have provided is accurate that my intended receipt is not a specially designated national (SDN) of blocked person or otherwise prohibited by Somalia government to receive funds, and that the transfer is not for any illegal purpose including money laundering or the financing of terrorist activity, note: this is the only official receipt of Amal Express Bari region. This Agent is not authorized to take any deposit from any customer				Receive Amt	[REDACTED]
Agent Signature		Customer Signature		Sent Amount	[REDACTED]
		Company Amal Express Bosaso		Ex-Rate	1.00000 USD
				Other Service	0.00 USD
				Commission	1.50000 USD
				Tax	0.00 USD
				Discount	0.00 USD
				Total	51.50 USD
				Taken Amount	51.50 USD
				Return Amount	0.00 USD
				User	dhubad
				Amount in Words	[REDACTED] &

2. QR-Code Scan

Trnid:SO208183603038,Sender: [REDACTED]
 AB [REDACTED] ABO,Receiver:Kl [REDACTED] id
 Yusuf,SentAmount: [REDACTED],Dated:
 2018-09-01,UserId:dhubadUrl:www.amalexp.com

Amal Express receipt published in the GI-TOC report

AMAL EXPRESS
Reliable Money Transfer

Bosaso branch, xarunta dhexo toll: 00 05823100, 252907794087

Sender details		Beneficiary Details		Transaction Details	
Name	Abdirahman Mohamed Omer	Name	Abdirabi Abdirabi Salim Al Baydani	Trans ID	[REDACTED]
Mobile	2529077	Mobile	009677	Date	2019-10-
Address	Bosaso, Puntland, Somalia	Address	MKLYEM	mode	Cash
Beneficiary Remarks		Call		Purpose	N/A
I certify that I'm transmitting funds on my behalf or on behalf of entity for which I am providing identification of affiliation, that the information I have provided is accurate that my intended receipt is not a specially designated national (SDN) of blocked person or otherwise prohibited by Somalia government to receive funds and that the transfer is not for any illegal purpose including money laundering or the financing of terrorist activity, note: this is the only official receipt of Amal Express Bari region. This Agent is not authorized to take any deposit from any customer				Sent amount	19500USD
Agent signature		Customer signature		Ex.Rate	1.1.000
				Commission	46USD
				Total amount	19546USD
				User	AMALBANKBSS
				Amount in words	Nineteen thousand five hundred and forty six dollars

2. Scan Quick Response (SQR) at the top right of the Amal Express receipt (above). The following is displayed.

 **Webpage**

Tap here to go to "www.pw2.it" in your browser.

1. Expected result:
The name of the send, receiver, amount, and date should be displayed, www.pw2.it website. Compare with the audit verified SQR code on Amal receipt on the previous page.
2. Click on www.pw2.it, the following is displayed:



Annex 3: Iftin Express receipt as published in the GI-TOC report compared with CBS authenticated Iftin Express receipt

(GI-TOC reported receipt)

IFTIN EXPRESS

IFTIN BOSSASO: mobiles/landlines: 2525827859/827/ 252907798791/ IFTINBSS@HOTMAIL.COM

Sender name: Abdirahman Mohamed Omer
Cell phone: 252907-
Address: Bss
Date: 03/2020
Teller:
Purpose: N/A

GNC:	
Beneficiary name:	Abdiraba Abdirab Salim
Mobile:	00967
Destination:	Mukalla/Ye
Amount:	\$18900
Charge	\$78
Rate:	1.1.0000000
Total:	\$18978
Total in words:	Eighteen thousand nine hundred and seventy eight dollars

DECLARATION:
I'm here to declare that the money sent here was not intended for illegal issues, and will take full responsibility on

Adopted from GI-TOC report receipt: <http://www.iftinuk/sendmoney/receivemoneyworldwide>

Hmm. We're having trouble finding that site.

We can't connect to the server at www.iftinuk.

If that address is correct, here are three other things you can try:

- Try again later.
- Check your network connection.
- If you are connected but behind a firewall, check that Firefox has permission to access the Web.

[Try Again](#)

Iftin receipt verified by the audit team (compare with above receipt from GI-TOC report)

3/2/2020

<https://www.iftinonline.com/EditRemittanceSa.aspx?1EE93TkC8zleCUbuAr4%2bGqKfJLTmclXXpODcb9fNF5pbUQrYqheidTxI15CjLQh>

iftinexpress

Airport-Road IFTIN GROUP Bld v.a.v Bosaso Stadium, BOSASO
Phone : 252-90-7798791/7791858/827802/00252-678-798791-829000-829002-829003 Fax : na


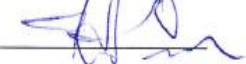


Receipt Voucher(Duplicate)

Rmt_No: BOS0066374

Date: 02-Mar-2020

SenderID: BOS0000065600	Benef_ID : BOS0000066016
Sender : [REDACTED]	Beneficiary: [REDACTED]
Mobile/Tel: [REDACTED]	City/Benef_Mob/Desc: ISTANBUL, Turkey /ogsoon
presentAddress: BOSASO	PermanentAddress:
City: BOSASO	Purpose_of_Trans:Family_Sup
Source_of_Fund: Other	PrincipalActivity:
Document: NA,DocNo:NA,Issued:1900-01-01 ,Expire:1900-01-01	PaymentDetails: Cash
Nationality: Somalia	Remarks: NA***FADLAN DEG DEG U WACA - WARAABE - Mar 2 2020 8:20AM
Amount: 2,000.00USD	NetPayable: 2,000.00 USD
Comm: 30.00USD	<input type="checkbox"/> PAID <input type="checkbox"/> NOT PAID
GrandTotal: 2,030.00 USD	

Cashier  User:JAAMAC MOHAMED YUUSUF Customer_Signature 

iftinexpress
Airport-Road IFTIN GROUP Bld v.a.v Bosaso Stadium BOSASO

Iftin Express verified receipt: www.iftinonline.com

Users Login

Username

Password

Access Code

4 + 2 =

Login

Annex 4: Dahabshiil receipts

Individual: Abdirahman Mohamed Omar sent USD 49,800 to Bashir Naaji Abdullahi Shujaac on Jan. 16, 2018:

Dahabshiil

CASH RECEIPT VOUCHER (BSS-0Q7ENLBC91HF-1612018)

DAHABSHIIL MONEY TRANSFER
 Dahabshiil Bosaso- BOSASO
 Phone : 823253.824238, SOMTELO660011013 Fax : 002525-826435

DATE : 16/01/2018 NAME : ABDIRAHMAN MOHAMED OMAR CASHIER : CARTAN2011
 PHONE: 252907796231 ADDRESS : CUST.ID : BSS896126972
 ID TYPE: ID NO : PURPOSE CONSUMPTION/FAMILY SUPPORT

TTNO	BENEFICIARY	AMOUNT	COMM	DEST	PHONE	RATE	Account
BSS1060331	BASHIIR NAAJI ABDULAHI SHUJAC	\$49,800.00	\$200.00	SANCA/YE	96747123735	1.000000	
	Total:	\$49,800.00	\$200.00	0.00 Points			
	GrandTotal:	\$50,000.00					

Cashier Signature _____ Remitter Signature _____
 I hereby declare that the money paid to you was not derived or obtained by or intended to be used for illegal means

RECEIVED

Annex 5: CBS team verified transactions

Taaj Money Transfer Summary

Sender Name	Receiver Name	Amount	Date	Status
YYYY	Khalil Abdow Muqbil	Not found	16/06/2016	Paid
		Not found	30/06/2016	Paid
		Not found	27/07/2016	Paid

Note: YYYY is an individual whose name was not mentioned in the GI-TOC report but uncovered by the CBS audit team.

Dahabshiil Money Transfer

Sender Name	Receiver Name	Amount	Date	Status
Abdirahman Mohamed Omar	XXXX	\$ 1,000.00	25/05/2017	Paid
	ZZZZ	\$ 997.00	30/12/2017	Paid
	Bashir Naaji Abdullahi Shujaac	\$49,800	16/01/2018	Paid

Note: XXXX & ZZZZ are, respectively, individuals whose names were not mentioned in the GI-TOC report but uncovered by the CBS audit team.