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Combating Terrorism Center



CASH CAMPS

FINANCING DETAINEE ACTIVITIES IN AL-HOL AND ROJ CAMPS

Audrey Alexander | September 2021

Cash Camps: Financing Detainee Activities in Al-Hol and Roj Camps

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Combating Terrorism Center at West Point

United States Military Academy



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Cover Photo: This screenshot is from an online campaign that uses multiple languages to promote content to raise funds for Islamic State detainees held in the detention camps. The Combating Terrorism Center edited this image to remove the specific Telegram handle soliciting further donations.

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Executive Summary

Over two years since the fall of Baghouz, authorities in detention facilities holding Islamic Stateaffiliated adults and minors in northeastern Syria face overwhelming challenges in securing this population, particularly alongside people displaced by conflict in the region. Often characterized as wastelands inhabited by a volatile population living in squalid conditions, camps like Al-Hol actually serve as a treasure trove for the region's violent extremists and criminal networks. Since the international community has not decisively answered calls to remedy the humanitarian and detention crisis involving facilities holding Islamic State detainees, many actors have exploited opportunities afforded by inaction, particularly with regard to financial activity. The Islamic State, for instance, has leveraged the situation to raise and move funds, build ideological and financial support for the cause, and establish logistical channels that benefit the organization. To explore this phenomenon and inform how stakeholders in the counterterrorism community might mitigate the issue, this report uses publicly available information and social media monitoring to trace how funds 1) move into, 2) move around, and 3) move out of two camps holding Islamic State detainees in northeastern Syria.

In short, the report details how individuals, networks, and groups inside and outside Al-Hol and Roj camps raise, use, move, manage, store, and obscure funds for and from alleged Islamic State detainees held in the facilities. The analysis seeks to explain some of the trends and dynamics emerging at each stage. The section about funds going into the facilities discusses notable players raising and moving money for detainees, particularly from abroad, then highlights popular funds transfer methods. The second section describes how and why funds move around the detention facilities, particularly within the camps' formal and informal economies, the latter of which involves transactions that camp administrators and security do not authorize or oversee. The third section details how funds leave the facilities, including trends such as detainees paying smugglers to facilitate their escape, and discusses why payments for such services are detrimental to stability in the region. Ultimately, this report makes the case that funds moving into, around, and out of Al-Hol and Roj camps enable some traditional terrorism financing issues and invite risks to the region by injecting funds that embolden facilitation networks involving violent extremists, criminals, and corrupt officials. Invigorating such networks has notable implications for the region and beyond since numerous entities may ultimately exploit the players and smuggling routes regenerating in Syria today.

After establishing a clearer understanding of financial activity in and around the camps, this report concludes with six policy considerations for players that can help challenge terrorist financing trends in Al-Hol and Roj camps, and thus, dynamics in the surrounding region.

- First and foremost, countries must offer detainees formal pathways out of the camps wherever possible and supplement such efforts with other measures to alleviate strain in the detention facilities. Since foreigners in the camps draw a lot of sympathy from abroad, sometimes culminating in the form of financial assistance, finding legitimate ways to move Islamic State detainees out of the facilities will reduce the demand for external funding. Moreover, doing so will also prevent foreign funds from enabling the escape of Islamic State detainees. Intervening in this way could prevent the injection of money into Syria that usually ends up going to violent extremist organizations, criminals, and corrupt officials and security personnel.
- Second, relevant stakeholders must aim to curb detainees' desire to escape and identify populations at risk of attempting escape. Prioritizing improvements within the facilities, including increasing access to humanitarian assistance and other essential goods and services, is a critical step in this process. When people escape from the camps, the funds used to facilitate that activity goes to various actors, including corrupt guards, criminal networks, and violent extremist groups. This dynamic is dangerous to the region and the international community because these entities exacerbate instability in the region and fund violent extremism and criminal enterprise.

- Third, increasing camp security and developing a clearer picture of the dynamics and networks in and around the detention facilities can help reduce the number of Islamic State-affiliated adults and minors escaping from the camps. The camps might ultimately benefit from greater financial intelligence capabilities to help determine which networks are financially enabling nefarious activities in the detention facilities.
- Fourth, wherever possible, security personnel in the region should look for ways to alter the operating environment of entities that enable the escape of Islamic State detainees and deny said detainees opportunities to pay their way out of their situations.
- Fifth, security officials and policymakers outside of Syria can identify, disrupt, and prevent the transnational movement of funds for Islamic State detainees in the camps. Such efforts can be multidimensional, involving domestic, bilateral, and multilateral approaches. Members of the Global Coalition to Defeat ISIS, for example, can use their respective authorities to undercut logistical networks that help move illicit funds into the camps and share information and good practices with other member states. Targeting the sources of funds may offer some promise given the opportunities for cooperation between security officials, international organizations, and the range of investigative and legal tools that might help reduce the flux of funds going into the facilities.
- Sixth, social media and financial technology service providers, among other private sector entities, can play essential roles in the fight against terror finance activity involving the camps. Technology providers should independently work to detect, disrupt, and prevent exploitation of their platforms for illicit financing where appropriate and stay vigilant and transparent about emerging trends. Additionally, organizations such as Tech Against Terrorism and the Global Internet Forum to Counter Terrorism may help improve service providers' awareness of and responses to illicit efforts to raise, use, move, or obscure funds for members of violent extremist groups. All in all, since multiple institutions in the private and public sectors hold information necessary to funding networks, stakeholders must pool their resources and collaborate to create a more complete picture of the problem.

Despite all of the challenges the detention crisis in Syria presents, particularly in the context of Islamic State detainees and terror finance in the camps, there are numerous ways to alleviate the situation. Ultimately, investing in efforts to alter the current trajectory of the camps and the terrorism financing issue emanating from those facilities, among other threats, could have short-, medium-, and long-term implications for the region and beyond.

Introduction

Over two years since the fall of Baghouz, the actors managing the detention facilities holding Islamic State-affiliated adults and minors in northeastern Syria continue to face challenges emanating from this population, which is often held alongside populations displaced by conflict. Ongoing uncertainty surrounding the internment of people with suspected links to the Islamic State, particularly the disproportionate number of women and minors held under guard in open-air camps, adds volatility to a fragile security environment. Beyond the detention facilities, Islamic State members continue operating in parts of Syria and Iraq, and the fight against the Islamic State movement is dynamic and ongoing.¹ While numerous sources suggest how unsustainable the detention and displacement crisis is from a humanitarian and human rights perspective, improvements to the facilities are slow coming.² The situation is still precarious, and circumstances surrounding Islamic State affiliates in the detention facilities, particularly the camps holding mostly women and minors, show that people continue adapting to this stark environment. Despite the efforts of the Syrian Democratic Forces (SDF)³ and the Global Coalition to Defeat ISIS, evidence suggests that the camps are a growing asset for the Islamic State because they serve as hubs to draw and move funds, build ideological and financial support for the cause, and establish channels that benefit the organization.

To better understand this phenomenon, this report surveys a range of primary and secondary sources to examine how money and other material resources move into, around, and out of camps holding Islamic State affiliates. Al-Hol camp in northeastern Syria, sitting east of the city of Hasakah, is the primary focus of this report. However, other locations holding Islamic State affiliates, namely Roj camp, will receive attention to contextualize this discussion. Al-Hol and Roj camps' complex composition of residents includes internally displaced persons (IDPs), and specifically, some people with links to the Islamic State. These facilities house disproportionate populations of women, girls, and boys. Their locations and experiences with health and safety issues make them insightful facilities to study. This report's efforts to chart some basic trends may help inform stakeholders attempting to detect, disrupt, and prevent terrorist and criminal financing activities in the future. To do this, the report will proceed in three sections tracing how funds (1) move into, (2) move around, and (3) move out of these two important camps. Each section will discuss the actors and tactics, techniques, and procedures at play in raising, moving, and using funds related to Islamic State-associated detainees in Al-Hol and Roj camps.

Before reviewing the methodology and noting some observable trends, it is helpful to establish why the topic of money surrounding the camps is important amidst the variety of pressing humanitarian and security challenges in northeastern Syria. First, the number of foreign nationals that are still in camps and prisons makes this issue relevant to the international community, especially because these demographics draw attention and funds to the region. As this report will show, global networks and individuals sympathetic to the Islamic State and the plight of populations held in the detention facilities inject resources into the region, sometimes by way of the camps. If conditions remain largely unchanged, the financial situation will persist, and the effects of inaction could have more local,

^{1 &}quot;Operation Inherent Resolve, Lead Inspector General Report to the United States Congress, January 1, 2021- March 31, 2021," U.S. Department of Defense, May 4, 2021.

^{2 &}quot;Syria: UN experts urge 57 States to repatriate women and children from squalid camps," UN OHCHR, February 8, 2021; "Thousands of Foreigners Unlawfully Held in NE Syria," Human Rights Watch, March 23, 2021; Isabel Coles and Benoit Faucon, "Refugee Camp for Families of Islamic State Fighters Nourishes Insurgency," *Wall Street Journal*, June 9, 2021; Wladimir van Wilgenburg, "Syrian Kurds need more support to secure al-Hol camp: official," Kurdistan 24, January 11, 2021.

³ The Syrian Democratic Forces (SDF) is the military army of the Autonomous Administration of North and East Syria (AANES). In short, the SDF is a Kurdish-led alliance of militias and partner to the U.S.-led Coalition to Defeat the Islamic State. For a primer on the configuration of the SDF, see Ruby Mellen, "A brief history of the Syrian Democratic Forces, the Kurdish-led alliance that helped the U.S. defeat the Islamic State," *Washington Post*, October 7, 2020. For added context, see also Carla Humud and Christopher Blanchard, "Armed Conflict in Syria: Overview and U.S. Response," Congressional Research Service, February 12, 2020.

regional, and global implications for the proliferation of violent extremism and criminal enterprise. Ultimately, a better comprehension of this environment may offer insight into other trends concerning terrorism financing in northeastern Syria and possibly different contexts in which people with ties to violent extremist groups are held under guard in makeshift camps.

From a practical standpoint, policymakers and practitioners should take advantage of the intelligence opportunities created by the present circumstances, particularly since there is a wealth of available information concerning financial dynamics on the ground and inside the camps. As counterterrorism researchers have established, terrorist organizations face trade-offs associated with the movement and management of funds.⁴ Traditionally, some trade-offs center around efficiency and security, since emphasizing one often comes at the cost of the other.⁵ In this context, the continued use of social media by pro-Islamic State individuals paired with the proliferation of fundraising initiatives promoted online increases efficiency while reducing security. When it comes to fundraising by and for Islamic State-affiliated women in the detention camps in northeastern Syria, this dynamic creates numerous vulnerabilities that counterterrorism practitioners can leverage.

Analytically, there is also utility in studying how finances move among specific populations within the Islamic State organization that are traditionally more auxiliary and supplementary to the organization's financial affairs, such as women.⁶ While speculative, factors such as relatively consistent access to communications technologies and networks capable of moving money and other resources might allow Islamic State members in facilities like Al-Hol to play different roles within the organization than previously. To put this dynamic in context, the U.N. Secretary-General's 11th report (August 2020) on the threat posed by the Islamic State to international peace and security notes that the group "was previously estimated to have approximately \$100 million in reserve." The organization reportedly continues to amass funds using various methods, including extortion of the local population, kidnap for ransom, and remittances from abroad.7 The 11th report continues, "Funds are also believed to accrue through crowd-sourced online fundraising," adding that "appeals to assist [Islamic State] fighters and their families in camps" often appear on social media.⁸ The 12th report (January 2021) expands on these trends, noting that U.N. member states consistently found that "funds flow to [Islamic State] family members housed in displacement camps through a range of methods. Most involve remittances to financial institutions or money service businesses in neighboring States, which are subsequently couriered into the Syrian Arab Republic or remitted through informal financial networks."9 Although these methods are not the only way the Islamic State is amassing funds, continuity in this vector has consequences. In addition to fostering an environment more conducive to the resurgence of the Islamic State, factors such as the plight of individuals in the detention facilities and the economy that meets that population's demands benefit criminal and extremist networks beyond those sympathetic to the Islamic State.

Although many states seem to recognize challenges associated with the detention camps holding

⁴ Jacob Shapiro, *The Terrorist's Dilemma* (Princeton, NJ: Princeton University Press, 2013); Tom Keatinge and Kerstin Danner, "Assessing Innovation in Terrorist Financing," *Studies in Conflict and Terrorism* 44:6 (2021).

⁵ Tom Keatinge and Florence Keen, "Social Media and (Counter) Terrorist Finance: A Fund-Raising and Disruption Tool," *Studies in Conflict and Terrorism* 42:1-2 (2018).

^{6 &}quot;O Women, Give Charity," Rumiyah, Issue 1, September 5, 2016.

^{7 &}quot;Eleventh report of the Secretary-General on the threat posed by ISIL (Da'esh) to international peace and security and the range of United Nations efforts in support of Member States in countering the threat," United Nations Security Council, S/2020/774, August 4, 2020; "Twelfth report of the Secretary-General on the threat posed by ISIL (Da'esh) to international peace and security and the range of United Nations efforts in support of Member States in countering the threat," United Nations Security Council, S/2021/98, January 29, 2021.

^{8 &}quot;Eleventh report of the Secretary-General on the threat posed by ISIL (Da'esh) to international peace and security and the range of United Nations efforts in support of Member States in countering the threat."

^{9 &}quot;Twelfth report of the Secretary-General on the threat posed by ISIL (Da'esh) to international peace and security and the range of United Nations efforts in support of Member States in countering the threat."

Islamic State affiliates, particularly women and minors, increased awareness about how that environment is conducive to raising and moving money to extremist and criminal networks may inform decisions that affect the facilities and the populations they hold. After a brief primer on the detention facilities holding Islamic State affiliates in northeastern Syria, emphasizing Al-Hol and Roj camps, the methodology section goes into greater detail about the various sources of information underpinning this report. Finally, the analysis section explores three phases of the money movement process: 1) funds moving into, 2) funds moving around, and 3) funds moving out of the facilities.

Background

To understand how money is moving in, around, and out of detention camps holding Islamic State affiliates and why that matters, it helps to take a step back and consider the broader governance and security landscape in northeastern Syria. In short, this landscape includes the Autonomous Administration of North and East Syria (AANES), which controls large parts of northeastern Syria, and its military arm, the Syrian Democratic Forces (SDF), a Kurdish-led alliance of militias formed in 2015 to beat back the Islamic State.¹⁰ Among other responsibilities, the AANES, generally alongside the SDF and several non-governmental organizations (NGOs),¹¹ manages a range of detention facilities holding alleged Islamic State detainees.¹² These facilities include both prisons¹³ and camps,¹⁴ with the location, size, and population in each affecting day-to-day management and security. The overall detainee population encompasses adults and minors of multiple nationalities, but the demographics held in each location differ.¹⁵ Some sites specifically hold suspected Islamic State affiliates, whereas others hold Islamic State detainees *and* internally displaced persons (IDPs).¹⁶ The composition of staff and security forces also varies between facilities, as can the presence and role of humanitarian

¹⁰ For a primer on the configuration of the SDF, see Mellen. For added context, see also Humud and Blanchard.

¹¹ A variety of international and local NGOs play a role in supporting the AANES and SDF's administration of the camps. For a more detailed discussion of the roles these NGOs play, see "Funds Going Into Detention Facilities" within the "Observations and Analysis" section of this report.

¹² In this context, the term "detainee(s)" refers to the population of alleged Islamic State affiliates, including adults and children, held under guard in AANES, SDF, and NGO-run camps and prisons. The word "detainee" is not universally adopted by stakeholders working on this topic, but this article uses a similar conceptualization about what constitutes a "detainee" in the current situation as the International Crisis Group and the U.S. Defense Intelligence Agency. For more on differing definitions, see "Operation Inherent Resolve, Lead Inspector General Report to the United States Congress, October 1, 2019-December 31, 2019," U.S. Department of Defense, February 4, 2020, p. 48.

¹³ As a point of clarity, there are generally important distinctions between the terms "jail" and "prison" since they are usually associated with different stages and methods of incarceration. Though imprecise, this article uses the term "prison" to refer to sites where Islamic State detainees are held under lock and key. To offer more context on the various types of facilities, a *New York Times* report explained that the SDF "has operated an archipelago of about half a dozen ad hoc wartime detention sites for captive ISIS fighters, ranging from former schoolhouses in towns like Ain Issa and Kobani to a former Syrian government prison at Hasaka." For more, see Charlie Savage, "The Kurds' Prisons and Detention Camps for ISIS Members, Explained," *New York Times*, October 22, 2019. For a useful resource and map of the sites in northeastern Syria, see Myriam Francois and Azeem Ibrahim, "The Children of ISIS Detainees: Europe's Dilemma," Center for Global Policy, June 2020, p. 7. Concerning the number of detainees, a U.N. report notes that "In November [2020], one Member State reported that there were some 11,000 male ISIL fighters held in the north-east of the Syrian Arab Republic. These comprise some 5,000 Syrians, 1,600 Iraqis, 1,700 foreign terrorist fighters of known nationality." See "Twelfth report of the Secretary-General on the threat posed by ISIL (Da'esh) to international peace and security and the range of United Nations efforts in support of Member States in countering the threat."

¹⁴ In contrast to prisons, this report will define detention camps as facilities where Islamic State-associated detainees, including families, are held under guard in more communal, open-air IDP settlements. The same New York Times report as cited in the footnote above explains, "The Kurds also operate more than a dozen camps for families displaced by conflict that hold tens of thousands of people, many of them non-Syrian wives and children of Islamic State fighters." See Savage.

^{15 &}quot;Twelfth report of the Secretary-General on the threat posed by ISIL (Da'esh) to international peace and security and the range of United Nations efforts in support of Member States in countering the threat." See also Savage.

¹⁶ Although some NGOs, humanitarian organizations, and human rights groups conduct research to collect data about conditions in displacement camps and detention facilities, it is important to note that they use a range of different methods of collection, and some do not appear to reliably collect or disaggregate information about Islamic State detainees. While understandable, this trend shows how difficult it is to have up-to-date information about the populations within the facilities. For general profiles on IDP camps in northeastern Syria, see "REACH Resource Center – Syria, Camp."

organizations.¹⁷

The primary focus of this study is Al-Hol, an overpopulated camp holding IDPs and Islamic State detainees east of the city of Hasakah. As one of the largest camps of its kind, it is difficult to know the precise number and demographics of people held in it at any given time. An October 2020 profile of the camp by REACH, an organization that provides data and analysis to help inform humanitarian activities, said there were 64,077 individuals in Al-Hol.¹⁸ Over the last year, IDPs and detainees have left the camp through initiatives coordinated by camp administrators and the SDF, and people also escaped without authorization from officials.¹⁹ A more recent report to Congress says that Al-Hol is estimated to house about 61,000 residents. Citing the U.S. State Department, the report explains, "[m]ost residents of al-Hol are Syrian and Iraqi, and approximately 9,000 are from other countries. Approximately two-thirds of al-Hol residents are under the age of 18, and more than half are under the age of 12. An unknown number of individuals sympathetic to [the Islamic State] live at the camp, some of whom have continued to actively support [Islamic State] activities from within the camp."²⁰ Though it is hard to determine the number of residents committed to the cause of the Islamic State, the presence of people with ties to the organization is clear.

For purposes of this report, there are two general divisions of the camp. The first is for locals: it holds Syrian and Iraqi citizens, including women, minors, and some men.²¹ The second division is a makeshift area at the southeast edge of a camp, often called the "foreigners' annex." This section is where non-Syrian and non-Iraqi Islamic State detainees traditionally live.²² Many of the adults (namely women) and minors living in the foreigner's annex arrived after the fall of Baghouz in 2019, suggesting that they stayed, either willingly or unwillingly, with the Islamic State until it lost its territorial caliphate.²³ In other words, though some individuals were trapped in Baghouz against their will, many people emerging from the enclave were committed members of the Islamic State. Once moved to the camps, this population drew attention from the security community because of dangers concerning violence and the propagation of the Islamic State's ideology, particularly among minors.²⁴

Although violent crimes occur in many parts of Al-Hol, the foreigner's annex is notoriously dangerous for residents, staff, and security forces. Humanitarian services across the camp, including healthcare, are already limited, and violence only makes it harder to deliver assistance, making matters worse.²⁵ This year alone, an uptick in violence disrupted humanitarian efforts to address critical needs in Al-Hol camp, and the already volatile and sub-standard situation continued deteriorating.²⁶ In the first few months of 2021, numerous sources highlighted a notable increase in the number of murders

23 Ibid.

¹⁷ For additional information about how the staffing of security forces and NGO workers in the detention facilities can change over time, see Elizabeth Tsurkov and Dareen Khalifa, "An Unnerving Fate for the Families of Syria's Northeast," Sada Feature, Carnegie Endowment for International Peace, January 31, 2020; "Twelfth report of the Secretary-General on the threat posed by ISIL (Da'esh) to international peace and security and the range of United Nations efforts in support of Member States in countering the threat."

^{18 &}quot;Camp Profile: Al-Hol," REACH, October 2020.

^{19 &}quot;Twelfth report of the Secretary-General on the threat posed by ISIL (Da'esh) to international peace and security and the range of United Nations efforts in support of Member States in countering the threat."

^{20 &}quot;Operation Inherent Resolve, Lead Inspector General Report to the United States Congress, January 1, 2021- March 31, 2021," p. 17.

²¹ Coles and Faucon.

²² For more on Al-Hol camp and the annex, see Aaron Zelin, "Wilayat al-Hawl: 'Remaining' and Incubating the Next Islamic State Generation," Washington Institute, October 2019.

²⁴ Gina Vale, "Women in Islamic State: From Caliphate to Camps," International Centre for Counter-Terrorism, October 2019.

²⁵ Lisa Schlein, "UN Security Concerns Rise Following Killings in Syria's Al-Hol Camp," Voice of America, January 24, 2021; "In Al-Hol camp, almost no healthcare is available," Medecins Sans Frontieres, August 27, 2020.

^{26 &}quot;Operation Inherent Resolve, Lead Inspector General Report to the United States Congress, January 1, 2021- March 31, 2021," p. 18.

occurring within the facility compared to previous rates.²⁷ In a translated press release from early April, the SDF's Internal Security Forces, the Asayish, said that there were "more than 47 executions inside the camp since the beginning of the year."²⁸ A recent report to Congress summarized commentary from the U.S. Department of State and the Defense Intelligence Agency, stating, "While some murders were not ISIS-related, perpetrators likely targeted most victims for defecting from ISIS, violating ISIS religious doctrine, or their perceived affiliation with security forces."29 This spike in violence led to a security initiative in late March when the SDF reportedly deployed about 5,000 internal security forces (Asayish) for a multi-day search of the camp.³⁰ Although reporting on the precise number of arrests varies slightly between sources, on April 2, 2021, a Twitter account associated with the SDF announced, "The security operation in [Al-Hol] has been concluded today. 125 people, most of whom are suspected to have links to ISIS, among them 20 senior members, have been arrested; military equipment and documents were confiscated."31 Other sources also indicate that the SDF arrested notable Islamic State personnel in the camp during the operation.³² Although initiatives like the one detailed above may be helpful in the short term, particularly along with other efforts to stop smugglers in and around Al-Hol, regular operations at that scale are not sustainable. Consequently, unless a variety of conditions change, similar challenges will persist and resurge.

Relative to Al-Hol, Roj camp is small and in a more isolated part of northeastern Syria. Originally meant to hold about 2,000 people, construction occurring in 2020 doubled the camp's capacity, and security forces transferred some families from the foreigner's annex of Al-Hol to Roj.³³ In a September 2020 interview conducted by the Rojava Information Center, one of the camp's administrators explained, "Now, there are Iraqis and Syrians here, but the Syrians are only about 14 households, plus 64 Iraqi households. The others are all foreign nationals. They number about 600 households. The Iraqis and Syrians are families, women, men and children. But the foreigners are women and children only."³⁴ In the eyes of ideologically committed Islamic State detainees, Roj camp is not necessarily better than Al-Hol because of rules enforcing what women can and cannot wear, among other factors.³⁵ By many accounts, however, the living conditions in Roj are better than Al-Hol.³⁶ Even so, human rights organizations and experts continue to raise concerns about the security and humanitarian situation

 [&]quot;Sleeper-Cell Report: Major operation in Hol Camp leads to high number of arrests," Rojava Information Center, April 14, 2021;
"Operation Inherent Resolve, Lead Inspector General Report to the United States Congress, January 1, 2021- March 31, 2021," p. 3.

^{28 &}quot;The statement delivered at the press conference on the end of the first phase of the humanitarian and security campaign today," Asayish press release, April 2, 2021.

^{29 &}quot;Operation Inherent Resolve, Lead Inspector General Report to the United States Congress, January 1, 2021- March 31, 2021," p. 3.

³⁰ Jeff Seldin, "More Arrests Made in Ongoing Crackdown on IS at al-Hol Camp," Voice of America, April 1, 2021.

³¹ Office of Media & Information, "The security operation in Al-Hawl has been concluded today ...," Twitter, April 2, 2021; Jeff Seldin, "Weeklong Operation Loosens Islamic State Grip on Syria's al-Hol Camp," Voice of America, April 3, 2021.

³² OIR Spokesman Col. Wayne Marotto, "Our #SDF and #Asayish partners arrested 8 members of #daesh, including ...," Twitter, April 2, 2021; "The arrest of the second man of ISIS in Al-Hol Camp," Hawar News, April 2021; Jeff Seldin, "Crackdown at Syria's al-Hol Camp Nets Senior Islamic State Operative," Voice of America, April 2, 2021.

³³ To visualize the scope of the expansion of Roj camp, compare satellite imagery of the city from the following dates: March 2020https://www.impact-repository.org/document/reach/d57b7f08/REACH_SYR_Map_Roj_CAMP_April2020_A0.pdf; October 2020 - https://www.impact-repository.org/document/reach/4115f094/REACH_SYR_Map_Roj_Camp_15Dec2020_A0.pdf. For more information, see "Twelfth report of the Secretary-General on the threat posed by ISIL (Da'esh) to international peace and security and the range of United Nations efforts in support of Member States in countering the threat."

^{34 &}quot;'Our aim is that these women open their minds' – Roj Camp management on transfers from Al-Hol," Rojava Information Center, September 20, 2020.

³⁵ See Appendix: IMG_6560.PNG, IMG_1905.PNG; "'Our aim is that these women open their minds' – Roj Camp management on transfers from AI-Hol."

^{36 &}quot;Our aim is that these women open their minds' – Roj Camp management on transfers from AI-Hol;" "Twelfth report of the Secretary-General on the threat posed by ISIL (Da'esh) to international peace and security and the range of United Nations efforts in support of Member States in countering the threat."

in Roj, often alongside critiques of conditions in Al-Hol.37

In addition to the internal dynamics mentioned above, myriad external factors complicate the task of managing these facilities. The AANES, SDF, and humanitarian organizations operating in the camps grapple with a complex geopolitical environment, limited resources, inconsistent support, operational constraints, an ongoing humanitarian crisis, a global pandemic, and enduring threats from violent state and non-state actors. Since the environment around the detention facilities is already volatile, events beyond the prisons and camps can have knock-on effects that influence daily life in the detention facilities.³⁸ Disruptions to essential services, such as the water and fuel shortages affecting northeastern Syria, disproportionately affect IDPs and detainees in the camps "for reasons due to dependence on camp services, lack of resources to pay for safe alternatives, and other factors including overcrowded environments."³⁹ Although the AANES, the SDF, and the coalition recognize the issues and take steps to address them by encouraging repatriations, enhancing security, and improving infrastructure, more drastic interventions are necessary.⁴⁰

Poor and dangerous conditions in the facilities—along with an array of other factors including uncertainty and frustration arising from protracted detention—and ideology can play a role in motivating some Islamic State detainees to change their circumstances. Some strive to improve their quality of life within the detention camp system with actions such as purchasing, repairing, or relocating tents; buying food, clothes, and toys; and acquiring more specific items such as medication, phones, sim cards, solar chargers, and possibly weapons. Other detainees take more drastic steps to alter their situation by attempting to escape from the camps. Realistically, both scenarios require funding, and in many cases, some degree of planning and preparation. Given how long some detainees have been held, this spectrum of activities is unsurprising, and some detainees' efforts to improve their lives are not necessarily problematic (such as raising money to purchase diapers). However, as detainees seek out goods and services that are not authorized or monitored by the camp's administrators, there is growing cause for concern. Furthermore, as government entities identify the camps as thoroughfares benefiting the Islamic State's broader financing efforts,⁴¹ a clearer view of the financial dynamics surrounding the camps is worth developing.

Methodology

The decision to examine the movement and circulation of funds at different stages is motivated by the author's adjacent research on the subject, an ongoing effort to study terrorist and violent extremist exploitation of charitable giving and crowdfunding platforms. Since the paths of funds into, around, and out of detention facilities are diverse, often varying from case to case, it is useful to identify some of the patterns that emerge at different points. In doing so, researchers and practitioners might identify more opportunities to detect and disrupt money flows and possibly prevent such resources from eventually benefiting Islamic State members and criminal networks that enable the organization's operations.

^{37 &}quot;Syria: UN experts urge 57 States to repatriate women and children from squalid camps;" "Thousands of Foreigners Unlawfully Held in NE Syria."

³⁸ For a more reflective discussion on this point, see Audrey Alexander, "The Security Threat COVID-19 Poses to the Northern Syria Detention Camps Holding Islamic State Members," CTC Sentinel 13:6 (2020), and "Syria: Aid Restrictions Hinder Covid-19 Response: UN Should Reauthorize Assistance from Iraq; Damascus Should Allow Passage," Human Rights Watch, April 28, 2020.

^{39 &}quot;Syria: Disruption to Alouk Water Station - Flash update #01," OCHA, April 28, 2021.

^{40 &}quot;Transcripts: General Kenneth F. McKenzie Jr. Middle East Institute Engagement Feb. 8, 2021," U.S. Central Command, February 8, 2021; Seldin, "Crackdown at Syria's al-Hol Camp Nets Senior Islamic State Operative."

^{41 &}quot;Memorandum for Department of Defense Lead Inspector General: Operation Inherent Resolve - Summary of Work Performed by the Department of the Treasury Related to Terrorist Financing, ISIS, and Anti-Money Laundering for Second Quarter Fiscal Year 2021," U.S. Department of the Treasury, May 19, 2021.

As stated in the introduction, this report uses a range of primary and secondary source materials to survey trends concerning how money moves into, around, and out of detention facilities holding Islamic State affiliates in northeastern Syria. The primary sources highlighted in this report include archives of social media accounts, crowdfunding platforms, and static websites used to promote fundraising initiatives that either claim to, or show signs of, materially supporting Islamic State affiliates in Al-Hol and Roj camp. Since January 2020, the author passively monitored Telegram, Instagram, and occasionally Facebook for information about these two camps and often traced content across various platforms when accounts indicated the use of other media on the accounts they were initially observed on. By October 2020, the author worked to capture and archive social media records more consistently to document more specifics about some of the online campaigns appearing to offer support to Islamic State affiliates in the detention camps.

Accounts and campaigns referenced in this report were hand-selected by the author after an extended period of monitoring. Public accounts were the focus of collection, but the author believes a handful of accounts may have changed to private settings during the monitoring period. Further inclusion in the study centered around the following criteria: campaigns and users had to either promote pro-Islamic State content; post at least some material that appears to be original (photos, videos, graphics, text, and URLs) concerning people held in Al-Hol or Roj camp; and show indications of interacting either online or offline with entities that are inside, or have access to, the facilities. After meeting those thresholds, this study focused on accounts and campaigns that appear to participate in financial activities that affect people in the camps (such as raising, moving, or receiving funds).

In the design and execution of this project, ethical considerations are a priority, and the author consulted with numerous colleagues to develop a reasonable approach. Using Michael Krona's 'traffic-light system' analogy for data collection strategies, the author stayed within green and yellow strategies to strike a balance between safety and access.⁴² Given the sheer number of photos collected for this project, for which collection is still ongoing, some of the underlying data for this report will be included in the appendix. However, considering sensitivities around the inadvertent dissemination of terrorist content and personal data, such as the bank details of some fundraisers, the author decided to create two copies of the appendix: one original and one redacted version. The Combating Terrorism Center and the author will retain the original version, and the redacted version will be available online.

Starting in December 2020, the author also created a relatively simple dataset to help track the numerous fundraising initiatives. Victoria Edwards and Michael Tannous, research assistants at the CTC, supported the project with background research and assistance in maintaining and analyzing the data. At present, this list includes fundraisers in German, Arabic, Turkish, English, French, and Russian. Although the focus of this report is financial support, some initiatives recorded in the tracker appear to involve other types of assistance for Islamic State affiliates, particularly in the form of food, clothing, and occasionally medicine and toys. There are notable limitations to this approach to social media collection, which will receive more attention later in this section, but whenever possible, the author tried to substantiate content posted on social media, contextualize it, and supplement the observation with other primary and secondary source material. Moreover, since the above-mentioned dataset helps identify notable trends and track numerous fundraisers, the content analysis is intentionally qualitative rather than quantitative.

In addition to social media accounts, crowdfunding platforms, and static websites, the author *sometimes* uses reporting and content by government entities and security officials, international organizations, non-governmental organizations, and news articles as primary sources. It also draws from a publicly available dataset built by Caki, an OSINT researcher at the Rojava Information Center, who is specifically "tracking ISIS/other sleeper cells and raids in the AANES since the fall of ISIS in

⁴² Michael Krona, "Gave talk at @GNET research conference yesterday on ...," Twitter, May 27, 2021.

Baghouz.^{**3} In other instances, materials by these entities may constitute secondary sources, such as when NGOs or journalists publish more thematic, analytical, or commentary-focused articles. As with other primary sources, such materials have limitations regarding accuracy, completeness, and neutrality. SDF-affiliated outlets, for instance, might be inclined to cast events in a particular light.

Secondary source materials in this report include materials by researchers, journalists, international organizations, and non-governmental organizations. Luckily, a growing body of discussion on the topic makes it easier to survey the landscape. A range of journalists and researchers explore how deteriorating conditions within detention facilities can benefit the Islamic State. To offer examples, publications discuss how the Islamic State leverages the camps in its propaganda, how the facilities enable terrorist networking and provide further opportunities for indoctrination, socialization, and radicalization for the minors.⁴⁴ In addition, some publications explicitly focus on finances in the detention facilities.⁴⁵ Further analysis of this topic is valuable because the methods of raising, moving, obscuring, and using funds continue to evolve. Likewise, the networks enabling and facilitating financial activities for Islamic State detainees in the camps may also change or become more practiced.

Since this report relies on publicly available information, it is necessary to discuss the limitations of this approach. First and foremost, it is hard to know the extent to which these observations reflect the range of dynamics manifesting on the ground. One researcher with experience conducting field work in Al-Hol also makes an important point regarding the information environment concerning the facility, explaining that sympathizers "routinely spread false stories inside al-Hol and on the social media platform Telegram."46 When relying on primary materials such as social media accounts that appear linked to Islamic State-affiliated women in detention facilities, the veracity of an individual's content or motives for espousing specific perspectives requires consideration. Furthermore, passive social media monitoring often yields incomplete information since many initiatives and individuals are unlikely to post comprehensive details about their operations, whereabouts, contacts, financial information, or other personally identifiable information. The other primary sources used in this report are also beneficial but potentially fallible. Consequently, across the board, readers are encouraged to maintain a healthy degree of skepticism when evaluating such material in this report. When relying on secondary sources, there can be a disproportionate amount of information about some phenomena over others, and it is challenging to validate and contextualize all observations. Even with such caveats in mind, the activities described in this report represent part of the broader system catering to the demands of violent extremist groups and their associates in northeastern Syria. Analyzing these trends can contribute, in some small measure, to a better understanding of this threat.

Observations and Analysis

The following sections trace trends concerning how funds 1) move into, 2) move around, and 3) move out of detention facilities. In doing so, the discussion will explore how individuals, networks, and

⁴³ To access the interactive resource, visit Caki and the Rojava Information Center's project tracking insurgent activity and SDF/Coalition raids in northeastern Syria at http://umap.openstreetmap.fr/en/map/insurgency-and-sdfcoalition-raids-in-the-aanes_288838#6/34.886/40.792. For more on this initiative by Caki and the Rojava Information Center, see https://rojavainformationcenter.com/category/report/sleeper-cells/

⁴⁴ For example, Vale; Devorah Margolin, Joana Cook, and Charlie Winter, "In Syria, the Women and Children of ISIS Have Been Forgotten," *Foreign Policy*, October 26, 2019; Zelin.

⁴⁵ For example, Vera Mironova, "Life inside Syria's al-Hol Camp," Middle East Institute, July 9, 2020; Audrey Alexander, "'Help for Sisters': A Look at Crowdfunding Campaigns with Potential Links to Terrorist and Criminal Networks," Global Network on Extremism and Technology, June 11, 2020; Christian Vianna de Azevedo, "ISIS Resurgence in Al Hawl Camp and Human Smuggling Enterprises in Syria: Crime and Terrorism Convergence," *Perspectives on Terror* 14:4 (2020).

⁴⁶ Elizabeth Tsurkov, "Uncertainty, violence, and the fear of fostering extremism in Syria's al-Hol camp," New Humanitarian, August 27, 2019.

groups inside and outside Al-Hol and Roj camps "raise, use, move, manage, store and obscure" funds⁴⁷ intended for alleged Islamic State affiliates within the detention facilities. The analysis seeks to explain some of the occurring dynamics, but it is vital to remember that individuals and networks continue to evolve, so the dynamics detailed below may come in many configurations. Moreover though, there is analytical value in parsing out the three main phases of the process, similar tactics, techniques, and procedures may arise at different points.

1) Funds Going Into Detention Facilities

To begin, this section explores how various actors use numerous methods and mechanisms to raise, move, manage, obscure, and possibly store money for alleged Islamic State affiliates, including individuals and families held in detention camps such as Al-Hol and Roj. A host of actors such as the family and friends of detainees, humanitarian organizations, various third parties, violent extremists and criminals, and detainees raise and move funds to the detention camps. With an understanding of some of the primary funding sources, this section of the report also looks at how funds reach Islamic State detainees. In that order, the following section will discuss such trends in greater detail.

Friends and Family

At least anecdotally, donations from family and friends are common sources of funds. While some detainees do not appear to have or maintain relationships with contacts from their lives before detention, others keep in touch with relatives and acquaintances, often via smartphone and internetenabled technologies, including social media and messengers. Realistically, multiple factors, including personal, ideological, or religious consideration, could motivate people to send funds to Islamic State detainees held in Al-Hol and Roj. Concern for the well-being of loved ones, for example, likely motivates some donors. On this point, it is critical to emphasize the reality that not everyone sending funds to the camp has sympathy for the Islamic State and its members, and personal contacts can also be reluctant to provide assistance.⁴⁸ This reluctance may stem from the risk of being defrauded by facilitators and losing money or fear of facing legal ramifications for sending funds to Islamic State detainees in the camps.⁴⁹

Humanitarian Organizations

As discussed earlier, humanitarian organizations play critical roles in managing facilities and providing for Al-Hol and Roj camp populations. Although some of these entities are internationally recognized, lesser-known regional and local organizations also service the facilities with approval from the AANES and the SDF. Blumont, Save the Children, and Syrian Arab Red Crescent are a few examples of such entities.⁵⁰ In general, there are allegations of corruption against personnel working in the camps, such

⁴⁷ In a research brief for Project CRAAFT, CTF expert Jessica Davis offers a straightforward and useful way to delineate various facets of financing terrorism. See Jessica Davis, "New Technologies but Old Methods in Terrorism Financing," Project CRAAFT, Research Briefing No. 2, 2020.

⁴⁸ See Appendix: IMG_1906.PNG.

⁴⁹ Chloé Benoist, "France temporarily detains relatives of citizens trapped in Syria camps," Middle East Eye, October 2020; "Pakistan Police Arrest Student for Sending Money to ISIS Terrorists in Syria," News18 – India, January 2021; J. La, "Les deux hommes interpellés pour financement du terrorisme ont été placés sous mandat d'arrêt," *Libre*, October 16, 2019; "Germany charges man with fundraising for Islamic State group," Associated Press, April 30, 2021; John Beck, "Funding Terrorism of Funding the Needy?" Rest of World, February 21, 2021; Coles and Faucon.

⁵⁰ An initial, non-exhaustive search suggests that the following entities reportedly have or had some role in providing services or assistance to AI-Hol and Roj camps: Blumont; Doctors Without Borders (MSF); USAID Bureau of Humanitarian Assistance; DOS Bureau of Population, Refugees, and Migration; Norwegian Refugee Council; International Rescue Committee; Un Ponte Per (UPP); Kurdish Red Crescent (Heyva Sor a Kurd); Save the Children; World Health Organization; UN OCHA; UNICEF; Human Rights Watch; UNHCR; International Committee of the Red Cross; Syria Humanitarian Fund; Mercy Corps; Reach; AI-Ihsan; AI-Beer; AI-Taalouf; GOPA; Syrian Arab Red Crescent.

as aid workers, maintenance staff, and security guards, who supposedly facilitate transactions for Islamic State detainees. Generally, however, workers staffing the camps do not seem to be fundraising on behalf of Islamic State detainees more broadly.

Third Parties

Numerous third parties appear to raise or move funds and other material goods, such as food, medicine, and toys, for Islamic State detainees in Al-Hol and Roj.⁵¹ Though some of these individuals and entities could overlap with the relatives and acquaintances of detainees, they tend to appeal to wider audiences of Islamic State sympathizers and people moved by the plight of Islamic Stateaffiliated women and minors held in the facilities. Relative to families sending donations, these thirdparty initiatives often have a more public presence on social media, messengers, and crowdfunding platforms. They generally claim to support sub-groups of the detainee population, often focusing on specific nationalities, families, and individuals. Several entities look like humanitarian services and charitable organizations interested in helping displaced persons but invite suspicion upon further investigation because of their behavior. An initiative that appears to be run out of Austria, for instance, highlights the poor living conditions of foreign women and minors in Al-Hol and Roj camps, but it does not tout the Islamic State or its ideology in any obvious way.⁵² Others do not attempt to mask their desire to help Islamic State affiliates in detention and post explicitly pro-Islamic State images or rhetoric in relation to the camps.53 In both scenarios, entities solicit calls for funding under the pretense of charitable giving. The author's research on this topic, along with numerous publications about this phenomenon, indicates that initiatives geared toward supporting Islamic State-affiliated women and minors, including orphans, are common.⁵⁴

Entities portraying themselves as charitable or non-governmental organizations that appear to raise and move resources into Al-Hol and Roj for detainees likely have varying degrees of real-world access to the camps. Although it is hard to confirm, some appear to rely on facilitators to conduct activities, whereas others appear to have more direct access to the camps.⁵⁵

Additional Insight: Trends Regarding Crowdfunding Campaigns Directed Toward the Camps⁵⁶

Given the proliferation of crowdfunding initiatives geared to connect Islamic State detainees in Al-Hol and Roj camps with funding, this breakaway section offers more insights into these campaigns. In short, this study involves an effort to track and examine a sample of fundraising initiatives that appear oriented toward supporting Islamic State detainees, namely women and minors, in the detention facilities in Al-Hol and Roj camps in northeastern Syria. At the time of writing, this sample encompasses about 40 initiatives that range from individuals and networks to organizations collecting funds. The languages featured most prominently in content by these entities are German, Arabic,

⁵¹ See Appendix: IMG_1664.PNG, IMG_1663.PNG, IMG_1662.PNG.

⁵² See Appendix: IMG_1658.PNG, IMG_1664.PNG, IMG_1663.PNG, IMG_2212.PNG, IMG_2184.PNG.

⁵³ See Appendix: IMG_1939.PNG.

⁵⁴ Richard Hall, "ISIS Suspects in Syrian camp raise thousand through online crowdfunding campaign," *Independent*, July 25, 2019; "Money 'being sent from UK to smuggle women and children out of Syria," ITV, March 19, 2021; Aymenn Jawad Al-Tamimi, "'Free the Female Prisoners': A Campaign to Free Women Held in SDF Camps," Aymenn Jawad Al-Tamimi blog, October 15, 2019.

^{55 &}quot;Money 'being sent from UK to smuggle women and children out of Syria;'" Al-Tamimi, "'Free the Female Prisoners': A Campaign to Free Women Held in SDF Camps;" "Leicestershire man 'used Bitcoin to fund Islamic State terrorism," BBC, June 9, 2021; Bel Trew, "Cryptocurrency, smuggling and the crumbling caliphate; Bel Trew investigates the fundraising drives, using social media and money transfer apps, led by women desperate to get themselves and their families out of squalid Syrian camps," *Independent*, November 30, 2020.

⁵⁶ Author's note: To view examples of the social media records discussed and references throughout this report, see the appendix.

Turkish, English, French, and Russian. Social media monitoring of this sample of accounts points to financial activity occurring mainly in Syria, Turkey, and Europe, but sources point to connections spanning farther afield. Examples of countries include France, Germany, Austria, the United Kingdom, Russia, Indonesia, India, Maldives, and the Gulf States.⁵⁷

Observations concerning platform usage from primary and secondary source material:

Social Media and Messengers: Instagram, Telegram, Facebook, WhatsApp, Signal, Signlance, Tam-Tam, Hoop, Wickr, YouTube, Twitter

Cryptocurrencies: Bitcoin, Monero, Dash

Crowdfunding and Money Transfer Apps: PayPal, PayPal MoneyPool, Virgin Money Giving, GoFundMe, GoGetFunding, Givebrite, DonationsAlerts.com, Qiwi Wallet, Tikkie.me

Money Transfer Services: Western Union, MoneyGram, Ria

Financial Institutions: During the collection period, accounts promoting fundraisers referenced various financial institutions, often providing bank details.

Other Platforms: Other observed tools include Simplesite, Shopify, Tellonym, The Onion Router (TOR), NORD VPN, and InShot.

Dynamics and Trends

As demonstrated by the list of examples above, crowdfunding initiatives often leverage numerous platforms to promote their calls for donations, coordinate logistics, and move and obscure funds. Social media monitoring for this study focused on Instagram, Telegram, and occasionally Facebook, but fundraisers and campaigns involve a complex ecosystem of platforms.

Some crowdfunding campaigns work together to promote initiatives and connect detainees with funding online and within the camps.⁵⁸ While difficult to gauge the full scope of such collaboration, it seems to center around interpersonal and logistical relationships with other fundraisers and facilitators. The prevalence of scenarios where campaigns work together and promote each other's content may be swayed by the project's data collection method, which essentially used known accounts to identify additional accounts to include in the study.

Despite some collaboration and cross-promotion between campaigns, there is also competition between initiatives. Another researcher studying crowdfunding in the camps notes how competition in online fundraising can create real-world tension between detainees that then manifests both online and offline.⁵⁹ Monitoring for this report noticed campaigns trying to vie for legitimacy, and it also revealed more subtle forms of competition. Some of the techniques fundraisers used to stay competitive in a saturated market include professionalizing promotional graphics, using multiple languages to engage a broader support base, and crafting new approaches to help one campaign stand out from others.⁶⁰ Popular techniques include sharing pictures of Islamic State detainees receiving assistance, sharing stories featuring the plight of specific individuals and families, and showcasing

⁵⁷ See Appendix. See also "Camp," Caki blog associated with Rojava Information Center, June 16, 2021; Trew; Alexander, "Help for Sisters': A Look at Crowdfunding Campaigns with Potential Links to Terrorist and Criminal Networks;" Vera Mironova, "Crowdfunding the Women of the Islamic State," Lawfare, October 29, 2020.

⁵⁸ See Appendix: IMG_1762.PNG, Screen Shot 20210608.png, Screen Shot 202106082.png, IMG_1960.jpg.

⁵⁹ Mironova, "Crowdfunding the Women of the Islamic State."

⁶⁰ See Appendix: File_081.png; File_085.png; IMG_1762.PNG; IMG_1899.PNG; IMG_1922.PNG; IMG_1928.PNG; IMG_1926.PNG.

how donations can cover the cost of particular items or services.⁶¹

Over the monitoring period, many fundraisers have shifted away from broadcasting specific financial information—such as banking details, including IBANs—but some still use that method. Most campaigns observed in this study use Telegram, Instagram, and Facebook to promote content to attract prospective donors, then they move to more direct communications, where fundraisers probably vet donors to some extent before providing information about how or where to send funds.⁶² Many fundraisers advertise multiple contact and payment options, likely to make themselves available to more prospective donors.⁶³ Similarly, another feature of many crowdfunding campaigns is gender-segregated contact options for donors.⁶⁴

Online Retail

Some regional, transnational, and international businesses also appear to play roles in efforts to raise, move, or obscure funds for Islamic State detainees in Al-Hol and Roj. Businesses offering specific goods and services in the region or around the camps, including money service businesses, receive more attention in other parts of this report. Given that the Islamic State and other violent extremist groups leverage online retail to raise and mask funds,65 there seems to be growing potential for the exploitation of online retail to raise, move, and obscure funds by entities striving to support Islamic State detainees in camps. While monitoring social media for this study, a few entities using social media profiles to promote products for sale ultimately drew the author's suspicion for numerous reasons. Although they looked innocuous at first, their popularity among online networks promoting fundraising campaigns for Islamic State detainees, use of symbolism traditionally associated with Islamic State sympathizers, and vague allusions to supporting widows and orphans is concerning. This is because such actions are consistent with pro-Islamic State media and other campaigns that are more explicitly involved in Islamic State financing activities. Further analysis of said entities invited more questions as well. To offer an example, the most legitimate and professionalized of the entities referenced here is a U.K.-based company with a web presence on Instagram and Shopify, an e-commerce platform where it sells embossed canvas bags, stationery, and jewelry. The company emphasizes charitable giving on Instagram, and its website offers vague opportunities to donate to widows and orphans. Online, the company says it was founded in 2020, and its Instagram account operated as early as May 2020. Interestingly, queries of companies registered in the United Kingdom show that an individual registered the company in January 2021 under one name, and by May 2021, that individual registered another company under a nearly identical name as the original company using the same address. Although the information available on the Companies House register is not intended to be comprehensive,⁶⁶ both companies appear to be open as of June 2021. At the time of publication, the site still claimed to offer support to widows and orphans, and continues to exhibit the same qualities that drew suspicion in the first place, but now, the "donate" button on the company's site inexplicably resolves to an error message.

In addition to the online retail dynamics described above, a few other observations are worth noting. Within a network of pro-Islamic State Telegram channels that regularly discuss detainees, the author found at least two users/channels offering graphic design services for a fee, indicating that some of

62 See Appendix: IMG_1552.PNG, IMG_1762.PNG.

⁶¹ See Appendix: IMG_2009.PNG; File_081.png; File_085.png; IMG_1552.PNG; File_104.png; File_075.png; File_049.png; IMG_0757. PNG; IMG_1899.PNG, IMG_1244.PNG, IMG_1935.PNG, IMG_1766.PNG.

⁶³ See Appendix: IMG_1551.PNG, File_052.png, IMG_1709.PNG.

⁶⁴ See Appendix: IMG_1550.PNG, File_085.png, IMG_0735.PNG.

⁶⁵ Davis; Chelsea Daymon, "Online Extremist Funding Campaigns: COVID-19 and Beyond," GNET, August 24, 2020.

^{66 &}quot;Companies House," Service Information, gov.uk.

the proceeds would go to sisters in the camps.⁶⁷ One of the two graphic design entities first stuck out to the author because it showcased a portfolio of its logo designs, and that portfolio featured several of the icons used by crowdfunding campaigns examined in this report and other articles.⁶⁸ Beyond these trends, the author noticed that channels where crowdfunding campaigns and pleas to help women in the camps are common sometimes promoted Telegram channels and accounts facilitating charity shop sales. Such initiatives could be coincidental, but they tend to be vague on details about where items up for purchase are or where funds from such sales go; consequently, such activities may warrant further scrutiny in subsequent analyses. While this research could not draw concrete links between these companies and support to Islamic State-affiliated detainees within the camps, fundraising activities by the Islamic State and other violent extremist groups have been creative and opportunistic in the past.⁶⁹ Counterterrorism analysts and practitioners might anticipate similar behavior in the future.

Violent Extremists and Criminal Networks

Next, violent extremist groups and criminal networks, namely but not exclusively those associated with the Islamic State, use the camps holding Islamic State detainees for numerous activities involving the movement, use, and obfuscation of funds.⁷⁰ Some efforts appear to be more closely aligned with Islamic State networks in Syria and Iraq, whereas others are touted by support groups online, often promoting crowdfunding initiatives and calls for others to help detainees.⁷¹ Islamic State propaganda, and content by the organization's figureheads, has directed attention toward the plight of Islamic State detainees in the prisons and camps. Concerning the latter demographic, which disproportionately encompasses women and minors, the group explicitly acknowledged and called for members to help remedy the circumstances of its supporters in the camps.⁷²

In both primary and secondary source material, there are some indications that other violent extremist organizations and criminal networks leverage the camps to their benefit as well.⁷³ One news article explains, "when scenes of the detention camps crystallized, as the media started documenting the living conditions inside, jihadist factions in Idlib, such as the [Hay'at Tahrir al-Sham (HTS)], [Hurras al-Din (HAD)], and the Turkistan Islamic Party [(TIP)], started to collect donations and secure funds to smuggle families of [Islamic State] fighters, especially women and children, out of the camps."⁷⁴ This report will offer more details supporting those claims in other sections as well, but Al-Hol is especially useful to violent extremist groups because of its security vulnerabilities, population, and its formal and informal economy and financial infrastructure. On this point, financial considerations, among other factors, likely motivate HTS, HAD, and TIP's efforts to fundraise and offer support to Islamic State detainees in the camps. Extremist groups' interest in the camps may also affect the detainees' behavior, some of whom might genuinely or opportunistically project particular extremist views online to garner more support from groups.⁷⁵

⁶⁷ See Appendix: IMG_6563.PNG, File_125.png, File_126.png.

⁶⁸ See Appendix: File_125.png; Alexander, "'Help for Sisters': A Look at Crowdfunding Campaigns with Potential Links to Terrorist and Criminal Networks."

⁶⁹ Daymon.

^{70 &}quot;Counter ISIS Finance Group Leaders Issue Joint Statement: Global Coalition to Defeat ISIS Convenes Fourteenth Finance Working Group Meeting," U.S. Department of the Treasury, May 25, 2021.

⁷¹ See Appendix: IMG_1904.PNG, IMG_0735.PNG, IMG_1766.PNG, IMG_1762.PNG, IMG_2222.PNG, IMG_2220.PNG; Bennett Clifford and Caleb Weiss, "'Breaking the Walls' Goes Global: The Evolving Threat of Jihadi Prison Assaults and Riots," CTC Sentinel 13:2 (2020); "Extremist Content Online: ISIS & Allies Recruit, Fundraise Online," Counter Extremism Project, July 16, 2019.

⁷² Zelin, p. 9; Aymenn Jawad Al-Tamimi, "Islamic State Editorial on the Coronavirus Pandemic," Aymenn Jawad Al-Tamimi blog, March 19, 2020; Coles and Faucon. See Appendix: IMG_1904.PNG.

⁷³ Vianna de Azevedo; Al-Tamimi, "'Free the Female Prisoners': A Campaign to Free Women Held in SDF Camps."

⁷⁴ Abdul Salam Hussein and Mohamed Hassan, "Syria: Smuggling Out of the Hell of Al-Hol," Daraj, May 26, 2021.

⁷⁵ Mironova, "Life inside Syria's al-Hol Camp."

Detainees inside the facilities, and seemingly people who have escaped from the camps, also have roles in raising funds. Numerous sources suggest that there appears to be a growing emphasis on individuals soliciting donations themselves rather than depending on other third parties and external actors.⁷⁶ Online, for example, some women in the camps seem to tout pro-Islamic State rhetoric to garner more financial support from sympathizers worldwide.⁷⁷ Social media monitoring offers insights into how women in the camps proactively use social media to raise awareness about their living conditions and highlight particular circumstances to substantiate the need for donations.⁷⁸ Some of the conditions emphasized by women in Al-Hol include extreme weather conditions, unreliable access to clean water, a lack of humanitarian assistance (including healthcare), pests and other sanitation issues, and treatment by security forces.⁷⁹ Although many of these issues are legitimate and flagged also by humanitarian and human rights organizations as problematic, nefarious actors also compellingly punctuate these issues to bolster the need for assistance.

Methods of Funds Transfer

With an understanding of some of the primary funding sources, this section of the report also looks at how funds reach Islamic State detainees inside the camps. Before money intended for Islamic State detainees in Al-Hol and Roj arrives in the camps, it may move through banks and other financial institutions, money services businesses, the *hawala* system, cash couriers, and a range of financial technologies, including crowdfunding platforms, cryptocurrencies, and possibly online retail platforms.⁸⁰ Numerous factors such as sanctions regimes, security concerns, access to trusted networks, and fees can inform decisions about the methods of transferring funds. Moreover, the preferences and priorities of players involved, including entities raising, moving, obscuring, receiving, or using funds, influence the process as well.

The methods available for transferring funds, and the networks that facilitate such activities, can be dynamic and multifaceted. For example, one Austrian-based fundraising initiative leverages multiple platforms to promote its work and collect funds, and then it appears to leverage financial institutions and money service businesses to get money inside the camps.⁸¹ Sometimes, that initiative seems to deliver financial assistance and other aid to Roj and Al-Hol on its own, though it may still rely on facilitators, and there are also instances where that entity collaborates with other actors.⁸² Changing circumstances may also alter how individuals and networks raise and move money over time. A news article illustrates this dynamic, noting, "While families have long sent money to the refugee camps via money transfer agencies such as Western Union and Moneygram, in recent months many have reported being barred from using such services - leading them to turn to cybercurrencies [or cryptocurrencies] such as Bitcoin.⁷⁸³

83 Benoist.

⁷⁶ See Appendix: IMG_1766.PNG, IMG_0735.PNG, IMG_1551.PNG, IMG_1552.PNG, IMG_2161.PNG, IMG_2188.PNG, IMG_2156.PNG, IMG_2061.PNG, File_104.png, Screen Shot 202106082.png, IMG_1928.PNG; Trew; Mironova, "Life inside Syria's al-Hol Camp."

^{77 &}quot;Operation Inherent Resolve, Lead Inspector General Report to the United States Congress, July 1, 2020 - September 30, 2020," U.S. Department of Defense, November 3, 2020, p. 55.

⁷⁸ See Appendix: IMG_1551.PNG; IMG_1187.PNG, IMG_1672.PNG, IMG_1670.PNG, IMG_1743.PNG; IMG_1789.jpg; IMG_1924.PNG, IMG_1923.PNG; Brune Descamps, "Diaries of Female Jihadists Imprisoned in Al-Hol Camp: An Analysis," GNET Insights, September 2020.

⁷⁹ See Appendix: IMG_1551.PNG; IMG_1187.PNG, IMG_1672.PNG, IMG_1670.PNG, IMG_1743.PNG; IMG_1789.jpg; IMG_1924.PNG, IMG_1923.PNG; Descamps.

⁸⁰ Trew; Davis; Vianna de Azevedo; "Twenty-fifth report of the Analytical Support and Sanctions Monitoring Team submitted pursuant to resolution 2368 (2017) concerning ISIL (Da'esh), Al-Qaida and associated individuals and entities," United Nations Security Council, S/2020/53, January 20, 2020.

⁸¹ See Appendix: IMG_1658.PNG, IMG_1659.PNG, IMG_1245.PNG, IMG_1660.PNG, IMG_1709.PNG, IMG_1812.PNG, IMG_1810.PNG, IMG_1809.PNG, IMG_1808.PNG, IMG_1880.PNG.

⁸² See Appendix: IMG_1803.PNG, IMG_1915.PNG, IMG_0757.PNG, IMG_0755.PNG.

Building on the last anecdote, both primary and secondary sources support the notion that cryptocurrencies are a growing part of the toolkit actors use to raise, move, and obscure money for women in the camps.⁸⁴ While monitoring initiatives on Telegram, the author identified instances where social media accounts provide cryptocurrency addresses or tell prospective donors to reach out for cryptocurrency addresses, namely Bitcoin and Monero, but this method has not entirely supplanted other ways of moving or hiding funds. This method may be growing in popularity as a way to evade restrictions imposed by businesses and states on more traditional money transfer methods. However, in the eyes of financiers, facilitators, and recipients, cryptocurrencies still have notable limitations concerning functionality and security. Since cryptocurrencies are not commonly accepted forms of payment within the camps, their utility may be limited as someone would likely need to convert the funds to a hard currency or other commodities (including coupons) and move those resources to Islamic State detainees inside the camps. Transnational networks have used cryptocurrencies to move funds to Turkey and Syria for the Islamic State and other extremist groups,⁸⁵ but the transfer methods discussed above remain popular.

This discussion of cryptocurrencies has highlighted the challenge of getting money into the camps, but even once the funds are available to the detainee, hurdles remain. Within the camps, the rules concerning detainees and their access to funds are conditional and subject to change.⁸⁶ Generally speaking, there are two main ways that funds arrive inside the camps: formal paths via camp administration-approved financial institutions, namely select *hawalas*, or informal paths via non-approved entities and transactions. Although it is helpful to distinguish these two categories for analytical reasons, the lines between them sometimes blur. When an individual receives cash from an authorized *hawala* operating within the camp on behalf of someone else (formal pathway), this person then takes a cut for facilitating that transaction and moving it to another part of the camp (informal pathway).⁸⁷ Similarly, if an individual working in a camp administration-approved institution behaves corruptly and conducts prohibited transactions, such activities also show a convergence between the two paths. The Syrian Observatory for Human Rights discusses this dynamic, explaining that "the administration of [Al-Hol] camp had allowed the camp's inhabitants to receive remittances of only \$200 per month, but the exchange offices and some of [Al-Hol] camp officials allow large amounts of money to enter to the camp's inhabitants in return for bribes."⁸⁶

Information gleaned from the authorized pathways reveals much detail for those seeking to understand trends regarding where the money is coming from. A May 2020 North Press Agency article quoting a man working at a money transfer facility in Al-Hol states, "Some ISIS women are receiving large amounts of money, exceeding \$3,000 monthly, from their relatives and friends in Turkish-

⁸⁴ See Appendix: IMG_2208.PNG, File_052.png. The U.N. Secretary-General's 12th report (January 2021) on the threat posed by the Islamic State notes, "The reported use of cryptocurrency in the Syrian Arab Republic has increased in recent months. There are ongoing reports of terrorist fighters or their family members seeking to raise funds via cryptocurrency wallet addresses.""Twelfth report of the Secretary-General on the threat posed by ISIL (Da'esh) to international peace and security and the range of United Nations efforts in support of Member States in countering the threat." See also "Treasury reported that during this quarter ISIS and its supporters also relied on cryptocurrencies and online fundraising platforms, apart from traditional methods of transferring funds into Iraq and Syria" in "Operation Inherent Resolve, Lead Inspector General Report to the United States Congress, January 1, 2021-March 31, 2021," p. 107. See also Trew.

⁸⁵ Trew; "French arrest 29 in cryptocurrency scheme to finance jihadis," Associated Press, September 29, 2020; "Leicestershire man 'used Bitcoin to fund Islamic State terrorism;" Daymon; "Operation Inherent Resolve, Lead Inspector General Report to the United States Congress, January 1, 2021- March 31, 2021," p. 107.

⁸⁶ See Appendix: IMG_1932.PNG, IMG_1933.PNG, IMG_0714.PNG; "'AI-Hawl mini-state' in November: Security chaos...escalating murder cases and the release of over 200 families of ISIS members," Syrian Observatory for Human Rights, December 11, 2020; Vianna de Azevedo.

⁸⁷ Namo Abdulla, "US Action Against IS Financier Shows Jihadists' Cash Flow Continues from Turkey," Voice of America, August 5, 2020.

^{88 &}quot;'Al-Hawl mini-state' in November: Security chaos...escalating murder cases and the release of over 200 families of ISIS members." Please note that reporting on the withdrawal limitations imposed on some detainees vary from source to source, but it generally seems to be around \$200-\$300; Mohammad Habash, "Documents - Money orders from Idlib to ISIS families in al-Hawl camp, northeastern Syria," North Press Agency, February 26, 2020.

backed opposition areas in Idlib and also from abroad, mostly from Turkey and several European countries."⁸⁹ A separate article from February 2020 contains a few photos of redacted remittance receipts reportedly from Al-Hol camp showing payments ranging from about \$20 to a little over \$2,000.⁹⁰ That article also highlights insights from an employee working in one of Al-Hol's "offices for remittances," who reportedly said that "sixty percent of the total sums come from Turkey."⁹¹ One researcher citing local sources summarizes trends on this front, noting, "There has been a constant inflow of money to [Al-Hol's] ISIS families within this annex through money orders [that] originated overseas and from within Syria. Money has been coming from at least 40 different countries as well as the Syrian province of Idlib and surroundings (Idlib town, Sarmada and Harem, mostly)."⁹² Though some funds may originate in Turkey, researchers also believe Turkey is a popular waypoint for money from other countries.⁹³ In some cases, sending funds by way of Turkey is more pragmatic from a logistical standpoint; in other cases, leveraging entities in Turkey might help mask the true purpose of funds.⁹⁴

Though details about the number of informal pathways are disparate and difficult to substantiate, an examination of the activities under this banner is also insightful. Donors, facilitators, and recipients may prefer an alternative, less regulated, or more covert method of moving funds for various reasons. Some might be motivated by a desire to circumvent the above-mentioned withdrawal limitations implemented by camp administrators and security officials to curb how much money some Islamic State detainees in the camps can access at a given time.⁹⁵ Others are likely wary of detection or repercussions associated with government-led Counter Terrorism Financing (CTF) measures.⁹⁶ On social media, there is some discussion on these decisions.⁹⁷ An auto-translated post by a Facebook user in a group with information about Al-Hol, for instance, says, "The Al-Reem Office for Transfer in the camp has received remittances from many countries and receives remittances from Europe, America and other countries, and the amounts allowed to be delivered to \$1000."98 The post then warns, "SDF is following these remittances to know the source ... Caution is required, sisters ... Because many who received the remittance have been accounted for."99 This entire process can involve individuals and networks of cash couriers and smugglers who receive funds, often in Turkey, Iraq, and Syria, and then eventually move those funds into the detention camps.¹⁰⁰ The numerous steps and players involved can invite risks, including detection by authorities.

Unsurprisingly, members of the Islamic State use many routes and methods to move and obscure funds, and the camps can be part of that process. In a recent memo, the U.S. Department of the

92 Vianna de Azevedo.

- 98 See Appendix: IMG_10912.PNG.
- 99 See Appendix: IMG_10912.PNG.

⁸⁹ Hisham Arafat, "Remittances for ISIS women in northeast Syria's al-Hawl camp trigger imminent resurgence of the jihadist group," North Press Agency, May 31, 2020.

⁹⁰ Habash.

⁹¹ Ibid.

⁹³ Mironova, "Crowdfunding the Women of the Islamic State." For more research by this scholar, see also Mironova, "Life inside Syria's al-Hol Camp." See also Vianna de Azevedo.

⁹⁴ Mironova, "Crowdfunding the Women of the Islamic State."

⁹⁵ Habash; "'Al-Hawl mini-state' in November: Security chaos...escalating murder cases and the release of over 200 families of ISIS members."

⁹⁶ Vianna de Azevedo. In a January 2020 report, the U.N. Analytical Support and Sanctions Monitoring Team said that it "communicated to government authorities that transactions by family members that appear to be remittances to detainees are violations of sanctions measures that prohibit the financing of terrorism." See "Twenty-fifth report of the Analytical Support and Sanctions Monitoring Team."

⁹⁷ See Appendix: IMG_10913.PNG, IMG_10912.PNG.

¹⁰⁰ See Appendix: IMG_1810.PNG, IMG_4150.PNG; "Twenty-fifth report of the Analytical Support and Sanctions Monitoring Team."

Treasury noted, "ISIS members in Iraq transferred funds to ISIS members in northeastern Svria. including in Internally Displaced Persons camps, such as [Al-Hol]. The group often gathered and sent funds to intermediaries in Turkey who smuggle the cash into Syria or send the funds to hawalas operating in the camp."101 Two suites of targeted sanctions by the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) offer more insight into these dynamics. Most recently, in May 2021, OFAC designated three individuals, including brothers Idris and Ibrahim al-Fay, and one Turkey-based money service business that has links to the brothers, facilitating funds transfers to Islamic State members. A Treasury press release describing their activities states, "Idris al-Fay, who is currently in Iraqi custody, used the Turkey-based Al-Fay Companyto facilitate the global distribution of currency on behalf of ISIS."¹⁰² Idris also used the company "as an intermediary between foreign donors and ISIS, including ISIS members located in the [Al-Hol] Internally Displaced Persons camp in northeastern Syria."103 In short, the brothers managed to send funds to the Islamic State "by appropriating funds from international sources through a network of currency exchanges and hawalas."104 Tracing back to July 2020, OFAC designated another Islamic State financial facilitator named Faruq Hamud. According to a press release, "Hamud operated a branch of the Tawasul hawala in the [Al-Hol] Internally Displaced Persons camp. This hawala served ISIS members and transferred payments for ISIS from outside Syria."105 The release went on to explain, "[Al-Hol] holds one of the largest concentrations of current and former ISIS members who continue to receive donations from ISIS supporters internationally. ISIS members receive these donations through multiple mechanisms that payout through the hawala system in the camp."106

On social media, a few initiatives tout their charitable efforts to support women and minors in the camps by posting photos of recipients holding cash with handmade signs promoting the entity providing the money or providing pictures of the money intended for that demographic.¹⁰⁷ Syrian pounds and U.S. dollars are the most prominently featured currencies in such photos, but other currencies occasionally appear, too, such as euros and Turkish lira.¹⁰⁸ Insight on the actor(s) facilitating that activity is more evident in some cases than others.¹⁰⁹ Similarly, some entities appear to provide funds more regularly and in different quantities than others.

For the sake of intelligence insights, authorities and researchers may want to evaluate the authenticity of bills circulating among Islamic State detainees in the detention facilities. Since accounts of fraudulent behavior arise at many junctions of financial activity concerning Islamic State detainees in that camp, criminals are likely abusing other facets of the process as well. An April 2021 non-Islamic State-related drug bust in northeastern Syria by the Asayish unearthed 11,250 fake U.S. dollars.¹¹⁰ There also appears to be a latent but ongoing issue of counterfeit banknotes, including U.S. dollars,

^{101 &}quot;Memorandum for Department of Defense Lead Inspector General: Operation Inherent Resolve."

^{102 &}quot;Press Release: Treasury Targets ISIS Financial Facilitators in Syria and Turkey," U.S. Department of the Treasury, May 17, 2021.

¹⁰³ Ibid.

¹⁰⁴ Ibid.

^{105 &}quot;Press Release: Treasury Designates Key ISIS Financial Facilitators in the Middle East," U.S. Department of the Treasury, July 28, 2020.

¹⁰⁶ Ibid.

¹⁰⁷ See Appendix: IMG_2009.PNG, IMG_1004.PNG, IMG_1628.PNG, IMG_0757.PNG, IMG_1899.PNG, IMG_2227.PNG, IMG_2225.PNG, IMG_2222.PNG, IMG_2220.PNG, IMG_2216.PNG, IMG_2194.PNG, IMG_2211.PNG, IMG_2118.PNG, IMG_2146.PNG, IMG_1965.PNG, IMG_1244.PNG, IMG_1935.PNG, IMG_10921.PNG, IMG_1034.PNG.

¹⁰⁸ See Appendix: IMG_2009.PNG, IMG_1244.PNG, File_009.png, IMG_4160.PNG, IMG_1004.PNG.

¹⁰⁹ See Appendix: IMG_1935.PNG, File_035.png, File_064.png, Screen Shot 202106082.png, IMG_1552.PNG, IMG_1628.PNG, IMG_1449.PNG.

^{110 &}quot;Statement of the press conference of our forces about the failure of the largest drug smuggling operation to our region," Asayish, April 12, 2021.

in northeastern Syria and other parts of the country.¹¹¹ If one considers the criminal networks and facilitators that enable that activity and the entities that counterfeiters target, it seems possible that counterfeit notes may pass through the camps at some point. Whether fake or authentic, arriving through formal or informal pathways, further analysis of hard currencies in the facilities could offer more insights into which actors are moving funds.

Disrupting the Flow of Funds Into the Camps

There are numerous challenges and opportunities when it comes to disrupting the flow of funds into the camps. In some ways, the ecosystem siphoning finances to the detention facilities is daunting because it is decentralized, has redundant nodes, and facilitators try to hide their activities. Though this reality is troublesome, it is vital to recognize the vulnerabilities of this arrangement and the myriad opportunities to alter the current financial situation. For one thing, the repatriation of foreign nationals with links to the Islamic State is arguably the most sustainable way to curb donations and remittances from abroad. As a supplementary course of action, governments should continue using CTF tools to detect and disrupt activity in the camps, and work with the financial sector and social media service providers where appropriate.¹¹² The promotion of crowdfunding initiatives geared toward helping Islamic State-affiliated minors escape from the camps for tactical training purposes. for example, is something service providers might detect and consider disrupting. In a January 2020 report, the U.N. Analytical Support and Sanctions Monitoring Team said that it "communicated to government authorities that transactions by family members that appear to be remittances to detainees are violations of sanctions measures that prohibit the financing of terrorism."¹¹³ Given that this process can involve large and small transactions from numerous stakeholders, further "analysis by national financial intelligence units of these transactions, in particular of the beneficiaries of such payments, may reveal important links between the formal and informal financial sectors in the Syrian Arab Republic."¹¹⁴ Further analysis could help delineate the ways money ebbs and flows from conflict in the region, and all the stakeholders involved in that process-Islamic State-related and otherwise.

Meanwhile, camp administrators and the SDF can continue to increase security in the camps and conduct counterterrorism operations, potentially with support from the coalition, to disrupt Islamic State-related financial activity in and around the detention facilities.¹¹⁵ Social media monitoring suggests that such efforts and other initiatives affect the flow of finances into the camps.¹¹⁶ To offer an example, the "Akhwat Tent" initiative on Telegram lamented the SDF's arrest of a man working in a *hawala* near Al-Hol camp, stating, "A dear brother whose only crime was managing the Bassam Hawala office and who was merely helping people was arrested today by the Kurdish kufar [in] Al-hol town. May allah grant him and others release soon."¹¹⁷ In its conclusion, this report will offer a broader discussion raising considerations for the counterterrorism community. For now, however, this initial phase seems to be the most complex, multifaceted part of the process, and understanding some of the dynamics at play may be critical in detecting and disrupting financial flows at other points. For

¹¹¹ For more on the matter of counterfeit bills in northeastern Syria and Syria writ large, see "Frozen and counterfeit dollars in Syria's Raqqa," North Press Agency, May 23, 2021; Orwa al-Mundhir, "Counterfeit US dollars proliferate in Homs," Enab Baladi, July 11, 2019. See also Asayish, "[Translated] The arrest of a person in possession of a forged amount of money in the city of Raqqa," Twitter, March 16, 2020.

^{112 &}quot;Memorandum for Department of Defense Lead Inspector General: Operation Inherent Resolve."

^{113 &}quot;Twenty-fifth report of the Analytical Support and Sanctions Monitoring Team," pp. 17-18.

¹¹⁴ Ibid., pp. 17-18.

¹¹⁵ Seldin, "Crackdown at Syria's al-Hol Camp Nets Senior Islamic State Operative;" "Arresting A Terrorist Responsible For Fund Transfers To ISIS Cells," SDF Press, February 3, 2021.

¹¹⁶ See Appendix: IMG_1931.PNG; IMG_10913.PNG; IMG_10912.PNG.

¹¹⁷ See Appendix: IMG_1931.PNG.

example, establishing who is sending money to Islamic State detainees in the camps and reviewing how they raise and move money through formal and informal pathways may help inform ways to disrupt this traffic.

2) Funds Going Around Detention Facilities

This section of the report addresses how funds move around the detention camps. Such trends offer insight into detainees' day-to-day activities and priorities. Much like pathways for funds moving into the camps, there are official and unofficial ways that money circulates within the facilities. Person-to-person cash transactions appear to be common, but there are other non-monetary methods of exchange as well. Individuals also find numerous ways to raise funds inside the camp and tend to be entrepreneurial and opportunistic.

First, when discussing how funds move around the facilities, it is crucial to recognize that individuals have varying degrees of access to funds from outside because it affects life inside the camps. For example, many sources indicate that the foreign Islamic State-affiliates in Al-Hol are often better off than their Syrian and Iraqi counterparts, but there are likely some exceptions.¹¹⁸ Detainees' financial situations may affect behavior, and disparities in wealth can significantly impact an individual's quality of life.¹¹⁹ On that point, the detainee populations held in Al-Hol and Roj camps, and all the social networks that entails, can be both communal and competitive on financial matters. Clusters uniting under ideological, national, ethnic, and social ties, among other identity-based support networks, often protect and care for each other.¹²⁰ To some extent, this arrangement can foster competition and rivalries among the detainee population, particularly as people vie for resources. The flip side of this dynamic is the support women provide to their networks inside the camp, as individuals look out for each other. Ultimately, these dynamics mean that an individual or family's social networks can notably affect their financial well-being.¹²¹

Transactions within the Formal and Informal Camp Economies

Formal and informal economies exist within the camps and drive financial flows among detainees and those working in the facilities. Daily transfers of funds are integral to these economies, but also to life in the camps. Reflecting on interviews with over 20 Islamic State-affiliated women held in Roj and Al-Hol, one scholar notes, "Life is not cheap ... It costs around \$500 a month for a family of four to survive."¹²² Although the SDF and a host of organizations offer some basic assistance, namely rice, lentils, and sometimes fuel for heaters, many things affect the arrival and distribution of such materials in detention facilities, producing ripple effects felt by detainees.¹²³ In both Al-Hol and Roj, most Islamic State detainees can visit a *souk* to purchase goods to supplement the limited resources provided by the SDF and camp administrators. Detainees can also acquire materials through the informal economy or black market within the facilities for various goods, including phones and weapons.¹²⁴ Either way, social media monitoring suggests other items available for purchase include new tents, solar chargers, lights, notebooks, clothes, diapers, phone accessories, storage containers, beauty products, and foods

¹¹⁸ Arafat.

¹¹⁹ See Appendix: File_049.png; Arafat.

¹²⁰ Mironova, "Life inside Syria's al-Hol Camp."

¹²¹ See Appendix: IMG_1906.PNG; Mironova, "Crowdfunding the Women of the Islamic State."

¹²² Mironova, "Crowdfunding the Women of the Islamic State." For more research by this scholar, see also Mironova, "Life inside Syria's al-Hol Camp."

¹²³ See Appendix: IMG_1605.PNG, IMG_0866.PNG, IMG_1942.PNG, IMG_2053.PNG, IMG_2145.PNG, IMG_2106.PNG; Alexander, "The Security Threat COVID-19 Poses to the Northern Syria Detention Camps Holding Islamic State Members."

¹²⁴ Vianna de Azevedo.

such as fruits, vegetables, coffee, and ice cream.¹²⁵

The availability and cost of goods within the camps can fluctuate, likely for many reasons, but inflated prices and exchange rates appear to be a notable grievance among women held in the facility.¹²⁶ In some cases, social media accounts that appear linked to Islamic State detainees inside the camps cite their circumstances, including the high cost of living, as a rationale to solicit donations.¹²⁷ The English-language multiplatform "Akhwat Tent – (Al-Hol Camp)" campaign promoted across Telegram, Instagram, and Facebook offers a good example.¹²⁸ On May 3, 2021, the Telegram channel associated with the initiative highlighted increased prices for food such as flour, rice, and dates, alleging that camp officials "increased the prices of these essential things so it becomes harder on us to eat well in Ramadan."¹²⁹ Then, the post adds, "My dear brothers and sisters inside the camp and outside, there are many families who can't afford any of this. If you can do zakat for the Muslim Ummah, please reach out to us."¹³⁰

Charitable Giving and Community Support

Among the detainees, particularly the foreign women in Al-Hol, there appears to be some semblance of charitable giving and participation in somewhat communal activities that benefit their networks. For example, some people supposedly offer funds to support informal religious, extremist, and educational instruction for children.¹³¹ Detainees also claim to use funds to care for people in need, such as orphans, the elderly, individuals with medical conditions, and those lacking funds.¹³² The motives for such involvement can vary from person to person, and they appear somewhat circumstantial. Around Ramadan, for instance, detainees appear especially communal, preparing and sharing food for *iftar* with family, acquaintances, and those in need.¹³³ Detainees also rally together and act charitably in notably trying times such as imminent threats of deportation, extreme weather events, the spread of disease, and tent fires.¹³⁴ Individuals might engage in philanthropic activities for numerous reasons, such as fulfilling religious imperatives or feeling genuine concern for those in need, but people can also behave charitably for ulterior motives that advance their interests. Offering more insight into this phenomenon, one researcher highlights findings from interview discussions about women detainees who hide and look after orphaned foreign minors. Though some women "legitimately believe that a child should not grow up in the land of nonbelievers, the majority are also doing it for the money. The more kids they have under their guardianship, the more money they can collect from ISIS and the orphans' relatives back home."135 In online campaigns that appear to be run by Islamic State detainees, charitable initiatives might also help obscure the real intentions of the funds or try to entice more donors than the fundraisers of competitors.

¹²⁵ See Appendix: File_049.png, IMG_6560.PNG, IMG_1605.PNG, IMG_1737.PNG, IMG_1224.PNG, IMG_1129.PNG, IMG_1104.PNG, IMG_1942.PNG, IMG_1957.PNG, IMG_2204.PNG. For more examples, see also "Camp," Caki blog associated with Rojava Information Center, June 16, 2021.

¹²⁶ See Appendix: IMG_1126.PNG, IMG_0714.PNG, IMG_1932.PNG, IMG_1933.PNG, IMG_2178.PNG.

¹²⁷ See Appendix: IMG_1605.PNG, IMG_1551.PNG, MG_1739.PNG, IMG_1730.PNG.

¹²⁸ Operating online since at least late January 2021, the "Akhwat Tent – (Al-Hol Camp)" campaign's stated purpose on Facebook as of May 3, 2021, is to "share news of Al Hol Camp. Our aim is also to help sisters inside the camp by staying connected and by raising funds to help those in need." See Appendix: IMG_1644.PNG.

¹²⁹ See Appendix: IMG_1644.PNG.

¹³⁰ See Appendix: IMG_1644.PNG.

¹³¹ See Appendix: Screenshot123.PNG. See also Vianna de Azevedo as well as Vale.

¹³² See Appendix: IMG_1551.PNG, IMG_1514.PNG, IMG_0955.PNG, IMG_1922.PNG, IMG_1928.PNG, IMG_1938.PNG, IMG_2163.PNG.

¹³³ See Appendix: IMG_0955.PNG, IMG_1939.PNG, IMG_2216.PNG, IMG_2212.PNG, IMG_2142.PNG.

¹³⁴ See Appendix: IMG_1926.PNG, IMG_1922.PNG, IMG_1938.PNG, IMG_1954.PNG, IMG_1899.PNG, IMG_6560.PNG.

¹³⁵ Mironova, "Life inside Syria's al-Hol Camp."

Labor for Resources

Whether by necessity or choice, Islamic State-affiliated detainees in Al-Hol and Roj camps find ways to work for money, furthering the circulation of funds in the facilities. Some of the roles that women assume include teacher, caregiver, informal money service provider, vendor, facilitator, cook, sex worker, and informant.¹³⁶ It seems as though camp administrators and security forces are aware of this dynamic, and for better or worse, enable some activities. As a straightforward example, in a September 2020 interview by the Rojava Information Center, one of Roj camp administrators explained, "Some of these women are poor, they don't receive any money by Hawala. So what do we do? We helped some of them to buy an oven and work, to prepare food and sell it."¹³⁷ More complex examples certainly exist, but they can be harder to detect with social media monitoring alone; however, some allegations circulate online about the nature of some detainees' relationships with security personnel in the camps.¹³⁸

Fundraising, Fraud, and Extortion

Since it is pertinent to this project's scope, women acting as fundraisers and informal money service businesses for others in the camps merit discussion. Some aspects of this trend received attention above, namely in the discussion about women in the camps who take matters into their own hands and use social media to solicit donations. This project's social media records offer numerous examples where women appear to collect and distribute funds to others but provide limited insight into how those entities technically receive those donations.¹³⁹ However, if detainees have the means to obtain and dispense contributions from donors, they likely have the networks and capability to facilitate other transactions as well. In both circumstances, the individual conducting the transactions may take a cut of the money or charge an informal processing fee for their service, but such arrangements could vary, and some facilitators may not necessarily try to profit from these transactions.¹⁴⁰ Additional research adds clarity to these dynamics, highlighting arrangements where women make money running "unofficial money-transfer offices" from their tents, enabling other detainees to circumvent the money transfer offices permitted by camp security and administrators.¹⁴¹ Ultimately, as discussed in the "Trends Regarding Crowdfunding Campaigns Directed Towards the Camps" subsection, multiple sources suggest that competition between women in the detention facilities working to raise and move funds can manifest in different ways, both online and offline.142

Though some informal business ventures seem relatively innocuous, others involve more predatory behaviors such as fraud, extortion, and the trafficking of goods and services. In May 2021, a post circulating on Instagram and Facebook offered some indication that women in Al-Hol camp were essentially defrauding the Blumont organization, which provides food and aid, by using authentic and falsified ration cards to claim additional food shares and aid.¹⁴³ Other posts also allude to the notion

¹³⁶ See Appendix: File_049.png, IMG_2178.PNG, IMG_2145.PNG; "Camp," Caki blog associated with Rojava Information Center, June 16, 2021; Mironova, "Crowdfunding the Women of the Islamic State;" and Mironova, "Life inside Syria's al-Hol Camp."

^{137 &}quot;'Our aim is that these women open their minds' – Roj Camp management on transfers from Al-Hol," Rojava Information Center, September 20, 2020.

^{138 &}quot;Camp," Caki blog associated with Rojava Information Center, June 16, 2021; "Government's Response to Defendant's Motion for Release," USA v. Samantha Elhassani, December 19, 2018, p. 16.

¹³⁹ See Appendix: IMG_1552.PNG, IMG_1899.PNG, IMG_1935.PNG.

¹⁴⁰ See Appendix: IMG_1449.PNG.

¹⁴¹ Mironova, "Crowdfunding the Women of the Islamic State."

¹⁴² See Appendix: IMG_1941.PNG, IMG_1926.PNG; Mironova, "Crowdfunding the Women of the Islamic State."

¹⁴³ See Appendix: IMG_1655.PNG, IMG_10910.PNG.

that detainees steal from each other.¹⁴⁴ In June 2021, the "Akhwat Tent" account mentioned above celebrated the return of women who were sent to a prison from the camp, and criticized the behavior of other Al-Hol residents while the women were in prison, saying "some people have been taking things, furniture and carpets from those sisters who go to prison. Let's please stop with this action. Say Alhamdulillah and be thankful for what you have and don't take what's not yours."¹⁴⁵

Though it may sound mundane, it is essential to take stock of some financial planning-related behaviors such as saving money, cutting costs, selling off goods and valuables, or taking other steps to increase or diversify capital. In some circumstances, behavioral shifts centered around resources might represent preparatory steps for escaping. Although money moving out of the camp is the focus of the next section, planning for such activity occurs in the camps. One researcher summarizes this dynamic, noting, "financial resources also serve to bribe officials, buy counterfeit documents" and "pay smugglers to move families outside the camp - among other things."¹⁴⁶ Some detainees also reportedly pay to move to different sections within the facilities.¹⁴⁷ These matters receive more attention in the final part of the analysis, which focuses on funds going out of the detention facilities.

3) Funds Going Out of Detention Facilities

Finally, it is helpful to look at trends regarding how funds move out of the detention facilities. Arguably one of the most concerning parts of this process, funds can leave the camps via just about every imaginable entity: legitimate and illegitimate vendors, maintenance staff, humanitarian workers, administrative officials, security guards, IDPs, detainees, smugglers, and scammers. Given the apparent popularity of cash among detainees, some funds likely leave the camp in that form. Detainees may also use other forms of exchange, including the formal and informal *hawala* systems. Funds intended to aid detainees can also circumvent the facilities altogether, namely in the form of direct payments to smugglers and facilitators. The range of activities highlighted here receives more attention below.

Vendors, Suppliers, and Services

First, money moves out of the camps through vendors and suppliers that overtly, and sometimes covertly, serve the detainee population. As discussed in earlier sections of this report, Islamic State detainees in Al-Hol and Roj have access to *souks* to purchase goods. That money may go back into the local economy in northeast Syria or elsewhere in the region. Beyond the transactions that camp administrators and the SDF permit, the *souks* and other locales within the facilities also host a range of unauthorized activities. This set-up also allows funds to move from inside to outside the facilities. Since the different demographics held in Al-Hol and Roj can live by different rules, what constitutes contraband can vary. However, a list of such items within Al-Hol and Roj camps might include certain foods, medications, cell phones, sim cards, functional items used as weapons such as hammers and knives, traditional weapons such as guns, and even travel and identity documents.¹⁴⁸ When considering what is available for purchase inside the camp, one should remember that the black market in northeastern Syria is thriving, so those inside the camps have relatively good access to networks and facilitators practiced in smuggling goods and people.

Funds from Islamic State detainees may also leave the camps with individuals who take payments for facilitating the unauthorized relocation of individuals, families, and networks within the camps.

¹⁴⁴ See Appendix: IMG_1711.PNG; IMG_10920.PNG.

¹⁴⁵ See Appendix: IMG_10920.PNG.

¹⁴⁶ Vianna de Azevedo.

^{147 &}quot;'Al-Hawl mini-state' in November: Security chaos...escalating murder cases and the release of over 200 families of ISIS members."

¹⁴⁸ For more about the broader market for travel and identity documents, see Vianna de Azevedo as well as "'Al-Hawl mini-state' in November: Security chaos...escalating murder cases and the release of over 200 families of ISIS members."

In a December 2020 blog post, the Syrian Observatory for Human Rights said that "some members of the Internal Security Forces (Asayish)" have "help[ed] extremist ISIS women to move from their section inside [Al-Hol] camp to other sections allocated for Syrian and Iraqis refugees in return for 4,000 USD."¹⁴⁹ The post continued, claiming that 110 women were smuggled to other sections within Al-Hol.¹⁵⁰ It is hard to verify the frequency or cost of such arrangements with publicly available information, but the notion that people pay to relocate within the camp is believable for several reasons. First, different sections have different rules and access to services, including money transfer facilities. Individuals may therefore want to move to another section to avail themselves of these opportunities. Second, individuals threatened by others in their section might also want to relocate for safety reasons. Finally, it is also worth noting that moving within the camp could also be an intermediary step within a broader attempt to escape.

Departing Detainees

Next, funds can leave the camps with Islamic State-affiliated detainees and the various entities who enable this population's departure from inside and outside the detention facilities. To reduce the number of people held in the camps, the SDF, camp administrators, and their partners have coordinated the release and transfer of some Islamic State-affiliated individuals and families to Syria, Iraq, and other countries.¹⁵¹ Funds can leave the facilities with those populations, though most of the Syrians and Iraqis released from the camps have limited resources at the time of their departure.¹⁵² Some foreigners may try to abuse coordinated release efforts. They may do so by acquiring identity documents to escape hidden among Syrians released from the camp,¹⁵³ but reporting on that method is limited, and it does not appear to be especially common.

Escaping Detainees

Beyond repatriations facilitated by officials, there is overwhelming evidence that women and minors pay to escape detention facilities by unauthorized means.¹⁵⁴ This trend is problematic because it perpetuates instability by progressively injecting funds into the region in ways that build up facilitation networks involving violent extremists, criminals, and corrupt officials. Invigorating such networks has tremendous implications for the region and beyond, as numerous entities may ultimately exploit the players and smuggling routes regenerating in Syria today. Detainees escaping from the camps often head toward other parts of Syria or cross into Iraq, but they also go to Turkey and a range of other countries.¹⁵⁵ A June 2021 news article, for instance, explains, "In recent months, fugitives from al-Hol have made it back to Sweden, the Netherlands, Finland and Belgium, according to judicial

^{149 &}quot;AI-Hawl mini-state' in November: Security chaos...escalating murder cases and the release of over 200 families of ISIS members."

¹⁵⁰ Ibid.

¹⁵¹ Please note that the releases highlighted here focus on the release of some Islamic State-affiliated persons, but the SDF, camp administrators, and humanitarian organizations also work to facilitate the departure of some IDPs and victims of the Islamic State held in the camps. Unfortunately, given the sheer size and complexity of the populations held in camps like AI-HoI, it can be difficult for officials to parse out Islamic State-affiliates from those displaced and victimized by the group. "'AI-Hawl mini-state' in November: Security chaos...escalating murder cases and the release of over 200 families of ISIS members;" "Thousands of Foreigners Unlawfully Held in NE Syria."

¹⁵² Sam Mednick, "Inside the troubled repatriation of Iraqis from Syria's al-Hol camp," New Humanitarian, June 7, 2021; Sofia Barbarani, "Leaving Syria's notorious al-Hol camp, civilians find little to go home to," New Humanitarian, January 14, 2021.

¹⁵³ Hussein and Hassan.

¹⁵⁴ See Appendix: IMG_2061.PNG, IMG_2066.PNG, IMG_1063.PNG, Screen Shot 202106082.png, IMG_1928.PNG, IMG_2188.PNG; Coles and Faucon; Guy Van Vlierden, "Confirmed by multiple sources that two former #IslamicState women from #Belgium & #France ...," Twitter, April 7, 2020.

^{155 &}quot;Twelfth report of the Secretary-General on the threat posed by ISIL (Da'esh) to international peace and security and the range of United Nations efforts in support of Member States in countering the threat;" Vianna de Azevedo.

records and counterterrorism officials."¹⁵⁶ This means that facilitation networks in Syria are already demonstrating links to transnational networks. Right now, they are moving Islamic State-affiliated women and minors, and likely other members of the organization. Now or in the future, if such networks go unchallenged, terrorist organizations may leverage them to pursue ambitions such as increasing foreign support or conducting external operations. Unpacking some of the ways detainees leave the camps shows how funds involved in that process can fortify logistical networks and set the stage for further problems.

For starters, any route detainees pursue to get out of the camps is a gamble, and there are financial trade-offs and risks associated with each. Many factors can affect the bribes and fees detainees pay smugglers, including their nationality, group size (number of adults and accompanying minors), current location, when they aspire to escape, who is facilitating said escape, and where they intend to go.¹⁵⁷ The smuggling and escape of Islamic State detainees from Al-Hol appear to be drastically more common than Roj, and factors such as the camps' respective locations, security situation, and populations likely shape these trends.¹⁵⁸ The process of smuggling Islamic State-affiliated adults and minors can involve multiple steps, stages, and players.¹⁵⁹ Preparing to escape and coordinating logistics to get out of the detention facilities can require their own steps and facilitators, and once detainees escape the boundaries of the camps, a mix of actions may follow.¹⁶⁰ Among other measures, said actions might include connecting with smugglers, changing methods of transportation, crossing checkpoints, paying bribes, staying in specific locations temporarily, acquiring travel and identity documents, seeking aid and other forms of assistance, convening with other smugglers and smuggled persons, and traveling across borders. In accounts of individuals, families, and networks that escaped from Al-Hol and Roj, it can be hard to separate facts from fiction and reconcile all the publicly available information.

As detainees escape from the camps, they generally walk, coordinate a ride, or rely on a combination of transportation methods. One researcher discussing women and minors fleeing Al-Hol for Idlib offers insight on the former option, explaining that "the cheapest and the most uncomfortable way out of the camp ... is a six-day walk."¹⁶¹ The researcher elaborates, explaining, "Counterintuitively, this is also considered the safest way," making it a preferred route among "women who have teenage boys" because of concerns that authorities will arrest the boys and treat the minors as adults if caught.¹⁶² However, that route is likely less favorable for detainee cohorts with young children or sick and disabled members who cannot realistically walk the required distance. Alternatives to walking are also popular but expensive and tend to involve rides in trucks and cars.¹⁶³

Detainees can leave the camps with the help of bribed security forces, but such options come at a high cost with considerable risk. For one thing, efforts to bribe security personnel can backfire, leading detainees to lose money and face repercussions for their actions, such as being moved to a more secure

¹⁵⁶ Coles and Faucon.

^{157 &}quot;For huge amounts of money, smuggling operations of ISIS families continue within al-Hol 'statelet' amid involvement of military and medical personnel in these operations," Syrian Observatory for Human Rights, July 9, 2019; Hussein and Hassan.

^{158 &}quot;Twelfth report of the Secretary-General on the threat posed by ISIL (Da'esh) to international peace and security and the range of United Nations efforts in support of Member States in countering the threat;" Anne Speckhard, Mona Thakkar, and Molly Ellenberg, "Social Media Tracking of ISIS Women and Real-Life Actions of ISIS Men on Their Behalf," Homeland Security Today, September 7, 2020.

^{159 &}quot;For huge amounts of money, smuggling operations of ISIS families continue within al-Hol 'statelet' amid involvement of military and medical personnel in these operations;" Hussein and Hassan; Coles and Faucon.

¹⁶⁰ Hussein and Hassan.

¹⁶¹ In that example, the researcher estimates the cost to be around \$12,000. Mironova, "Life inside Syria's al-Hol Camp."

¹⁶² Mironova, "Life inside Syria's al-Hol Camp."

¹⁶³ Hussein and Hassan.

detention facility.¹⁶⁴ Many accounts indicate that bribing officials in the SDF is expensive,¹⁶⁵ but there also tends to be much variation in the reported costs of smuggling and bribes.¹⁶⁶ In any case, bribing guards, especially more junior individuals, is common.¹⁶⁷ Despite apparent gaps in security, the SDF writ large continues to try to disrupt and prevent escape attempts inside and outside the camps.¹⁶⁸ In October 2020, the SDF announced that its special units worked with the coalition to execute a security operation that culminated in the arrest of three Islamic State members in Al-Hol. Security forces reported the confiscation of weapons and equipment the cell members used to smuggle other members and families of the Islamic State.¹⁶⁹ Similarly, about a month later, the SDF arrested a member of the Islamic State in Shaddadi trying to smuggle families and members of the Islamic State from Al-Hol camp.¹⁷⁰

Islamic State detainees may also pay local vendors, humanitarian workers, and other personnel working around facilities to help them escape. One of the better-known examples of such activity comes from a video that circulated online showing a water truck driver who, in the presence of security forces at Al-Hol, opens the truck's tank to reveal a few women and minors.¹⁷¹ On social media, news reports, and the Rojava Information Center's dataset tracking relevant events in northeastern Syria, numerous accounts show women and minors trying to get out of Al-Hol in water trucks and other service and delivery vehicles.¹⁷² This option can be risky, especially when workers turn detainees attempting to escape over to security forces.¹⁷³

Funds undoubtedly leave the camps through violent extremist groups and human smuggling networks that service the facilities. Most obviously, Islamic State operatives staying in or moving through the camps, and smugglers in their networks, play a role in this process.¹⁷⁴ Far from a new problem, the Islamic State benefits from long-established smuggling networks in the region, including those serving migrants and their own smugglers.¹⁷⁵ In short, the group moves women, men, and minors "into places where its cells are better structured such as in the cities of Deir Al Zour, Raqqa, Idlib and several rural

¹⁶⁴ See Appendix: IMG_1924.PNG.

¹⁶⁵ Mironova, "Life inside Syria's al-Hol Camp."

^{166 &}quot;For huge amounts of money, smuggling operations of ISIS families continue within al-Hol 'statelet' amid involvement of military and medical personnel in these operations;" "'Al-Hawl mini-state' in November: Security chaos...escalating murder cases and the release of over 200 families of ISIS members;" Mironova, "Life inside Syria's al-Hol Camp;" Hussein and Hassan.

 [&]quot;Operation Inherent Resolve, Lead Inspector General Report to the United States Congress, July 1, 2020 - September 30, 2020," p. 54.

¹⁶⁸ See Appendix: IMG_1742.PNG; Coordination & Military Ops Center – SDF, "Our #SDF units have successfully detained ...," Twitter, April 15, 2021; "Operation Inherent Resolve, Lead Inspector General Report to the United States Congress, January 1, 2021- March 31, 2021."

¹⁶⁹ Coordination & Military Ops Center – SDF, "Our special units with the #International_Coalition executes a security operation ...," Twitter, October 15, 2020.

^{170 &}quot;Joint Security Operations Between Our Forces And The International Coalition," SDF Press, November 15, 2020.

¹⁷¹ Fazel Hawramy, "Horrifying video emerges of women, children smuggled out of al-Hol camp," Rudaw, September 16, 2020.

¹⁷² See Appendix: IMG_1681.PNG; IMG_10909.PNG; Caki and the Rojava Information Center's project tracking insurgent activity and SDF/Coalition raids in northeastern Syria at http://umap.openstreetmap.fr/en/map/insurgency-and-sdfcoalition-raids-in-theaanes_288838#6/34.886/40.792; "UNICEF driver attempts to smuggle ISIS families from Syria's Hawl camp," North Press Agency, July 27, 2020; Jindar Abdulqader, "Iraqi refugee killed in Hawl camp, four women arrested," North Press Agency, October 3, 2020.

¹⁷³ See Appendix: IMG_1742.PNG.

^{174 &}quot;Operation Inherent Resolve, Lead Inspector General Report to the United States Congress, January 1, 2021- March 31, 2021;" Ahmed Mohammed, "Who Smuggles ISIS women from al-Hol camp? Here is irrefutable evidence," Hawar News Agency, March 21, 2020; "ISIS cells arrested in Deir Ezzor and Qamishlo: SDF announces," Hawar News Agency, January 25, 2021; "Joint Security Operations Between Our Forces And The International Coalition."

¹⁷⁵ Vianna de Azevedo; Eva Kahan, "ISIS Ramadan 2021 Campaign Review," Institute for the Study of War, 2021.

spots in the central and southeastern Syrian desert."¹⁷⁶ Over the last year especially, the southeastern Syrian desert (particularly an area known as the "Badiyah") has become an important hub and relatively safe place for the Islamic State to reconstitute itself, attack pro-regime forces, and plan for the future.¹⁷⁷ Reportedly relying "both on criminal networks and criminal 'in-house' capabilities" for its activities, the Islamic State also moves personnel to Iraq, Turkey, and Lebanon.¹⁷⁸ Reviews of SDF and coalition press releases about operations against the Islamic State and the Rojava Information Center's tool tracking SDF operations and Islamic State activity indicate that the areas Islamic State affiliated smugglers traverse while moving families from the camps can overlap with supply routes for funds and weapons.¹⁷⁹

As an interesting addendum to commentary about the Islamic State-facilitated escapes from the camps, some women in Al-Hol camp express their desire for a large-scale rescue operation by the Islamic State on social media.¹⁸⁰ With more time passing, a few accounts have also demonstrated increasingly frustrated attitudes toward the Islamic State and its uncaptured operatives because of their apparent inaction when it comes to rescuing the women and minors from the camps.¹⁸¹ Accounts proffer similar sentiments, along with a range of other narratives, religious and otherwise, to try and guilt online sympathizers into donating funds to help women and minors escape from Al-Hol and Roj.¹⁸²

Returning to the focus of this section, the business of smuggling Islamic State detainees benefits a range of actors, not just the Islamic State and its networks. By several accounts, members of the Islamic State and its smuggling networks continue to cross the Syrian-Iraqi border to move people, money, and weapons, among other things.¹⁸³ One news article quotes a Syrian smuggler as saying "the road to Iraq is more expensive than the road to Idlib."¹⁸⁴ Depending on the route and other factors, the smuggler explained that "Prices range between \$5,000 and \$20,000," noting that "These sums are divided among smugglers, leaders from the SDF and the Popular Mobilization Forces (PMF) on roads leading into Iraq, as well as factions of the Syrian army on roads to Idlib."¹⁸⁵ As caveated earlier, smuggling prices vary between sources and tend to be somewhat context-specific. In many cases, escaped detainees and their smugglers pay bribes to numerous entities along the way.¹⁸⁶

185 Ibid.

¹⁷⁶ Vianna de Azevedo; "Operation Inherent Resolve, Lead Inspector General Report to the United States Congress, April 1, 2021- June 30, 2021," U.S. Department of Defense, August 3, 2021, p. 15. See also Caki and the Rojava Information Center's project tracking insurgent activity and SDF/Coalition raids in northeastern Syria at http://umap.openstreetmap.fr/en/map/insurgency-andsdfcoalition-raids-in-the-aanes_288838#6/34.886/40.792

^{177 &}quot;Operation Inherent Resolve, Lead Inspector General Report to the United States Congress, April 1, 2021- June 30, 2021," p. 15; Halab Today TV, "Pro-Assad forces reinforce their points in ...," Twitter, May 6, 2021; Orient News, "Violent clashes between ISIS and the Assad militia in ...," Twitter, June 15, 2021; Jeff Seldin, "Islamic State Group Smuggling Boys to Desert Training Camps," Voice of America, August 3, 2021.

¹⁷⁸ Vianna de Azevedo; Husham Al-Hashimi, "ISIS on the Iraqi-Syrian Border: Thriving Smuggling Networks," Newlines Institute, June 16, 2020; Hussein and Hassan.

¹⁷⁹ Coordination & Military Ops Center - SDF, "Our special units from the #SDF detained a wanted #ISIS family smuggler ...," Twitter, February 8, 2021; OIR Spokesman Col. Wayne Marotto, "The Coalition continues to work with the #SDF to degrade ...," Twitter, February 8, 2021; OIR Spokesman Col. Wayne Marotto, "With enabling support from the @Coalition, our #SDF partners ...," Twitter, May 12, 2021. See also Caki and the Rojava Information Center's project tracking insurgent activity and SDF/Coalition raids in northeastern Syria at http://umap.openstreetmap.fr/en/map/insurgency-and-sdfcoalition-raids-in-theaanes_288838#6/34.886/40.792

¹⁸⁰ See Appendix: IMG_1973.PNG, IMG_0982.PNG, IMG_0671.PNG; IMG_2134.PNG.

¹⁸¹ See Appendix: IMG_1743.PNG, IMG_1905.PNG, IMG_1906.PNG, IMG_1970.PNG, IMG_1954.PNG, IMG_1895.PNG, IMG_2188.PNG.

¹⁸² See Appendix: IMG_2198.PNG, IMG_1871.PNG, IMG_1730.PNG, IMG_1743.PNG, IMG_1906.PNG, IMG_1648.PNG, IMG_1551.PNG, IMG_1799.PNG, IMG_1895.PNG, IMG_1954.PNG, IMG_2132.PNG, IMG_2134.PNG, IMG_2188.PNG, File_128.png, IMG_0854.PNG.

¹⁸³ Al-Hashimi.

¹⁸⁴ Hussein and Hassan.

¹⁸⁶ See Appendix: IMG_2198.PNG; Trew; Mironova, "Life inside Syria's al-Hol Camp."

In Syria, funds intended for and coming from the camps can also end up in the hands of other extremist groups and the networks that appear to work with extremist groups. Numerous sources indicate that groups other than the Islamic State raise funds to enable the escape of Islamic State-affiliated women and minors. Groups operating in northwestern Syria, particularly in Idlib Province, offer a relatively hospitable destination for some Islamic State detainees. An early 2020 report by the United Nations Security Council's Analytical Support and Sanctions Monitoring Team notes, "Idlib Province, in the north-west of the Syrian Arab Republic, remains dominated by groups affiliated with Al-Qaida but also plays host to relocated ISIL fighters and dependents."¹⁸⁷ One notable effort promoted on Telegram called "Fukku al-Asirat" or "[Free the Female Prisoners]," has reported ties to al-Qa`ida supporters operating in Idlib, and it claims to collect funds to help women and minors escape from the camps.¹⁸⁸ In an interview with Aymenn Al-Tamimi, a spokesperson for the initiative said, "The campaign is completely independent and is not affiliated with or subject to any organizational party. And most of the leaders of it are independent."¹⁸⁹ After that comment, however, the spokesperson essentially caveats that the campaign is willing to work with other groups when it is in the initiative's interest to do so.¹⁹⁰

Three groups operating in northwestern Syria appear to enable the movement of Islamic Stateaffiliated women and minors from the camps: Hay'at Tahrir al-Sham (HTS), Hurras al-Din (HAD), and the Turkistan Islamic Party (TIP).¹⁹¹ All three have reportedly smuggled foreigners out of the camps and collected funds to support such activities.¹⁹² However, the priorities and capabilities of the groups seem to influence the scope of their efforts.¹⁹³ HTS, for example, is likely the most capable of smuggling Islamic State affiliates through northwestern Syria. To the extent that it can, HTS controls who passes through or finds safe haven in HTS-controlled areas. Likely benefiting financially to some extent, HAD and TIP also move Islamic State detainees from the camps to other parts of Syria.¹⁹⁴ TIP, for example, focuses on smuggling a targeted subset of the detainee population, namely Uighurs.¹⁹⁵ This study found evidence a range of other curious dynamics that require further analysis. Subsequent work on smuggling activities by entities acting as proxies for state and non-state actors, for instance, is valuable.

One trend involves a complex web of Turkish-language entities (some of which also used German, Arabic, Russian, English, and French) operating online that appear to have a notable interest and presence in Al-Hol and Roj camps, among other locations. Some probably have ties to violent extremist organizations, including those operating around Idlib, and all warrant further scrutiny. With the help of a native Turkish speaker who also studies terrorism and counterterrorism, ¹⁹⁶ the author investigated a sample of six initiatives: Darul Hayr Adana, Dar'ul Hayr, Ehli Hayr, Kardesinesir, al-Hayrat, and Bacin Esir Kampinda. Of these entities, which look like charitable organizations at first glance, none are registered under the names they use on social media, according to queries of Turkey's public

- 193 Ibid.
- 194 Ibid.

^{187 &}quot;Twenty-fifth report of the Analytical Support and Sanctions Monitoring Team."

¹⁸⁸ Al-Tamimi, "'Free the Female Prisoners': A Campaign to Free Women Held in SDF Camps;" Zelin; John Dunford and Brandon Wallace, "ISIS Prepares for Breakout in Prisons and Camps," Institute for the Study of War, September 23, 2019; Charlie Winter, "57. As an aside, #ISIers in al Hol have been throwing shade ...," Twitter, October 21, 2019.

¹⁸⁹ AI-Tamimi, "'Free the Female Prisoners': A Campaign to Free Women Held in SDF Camps."

¹⁹⁰ Ibid.

¹⁹¹ For more on these groups, see "Twenty-eighth report of the Analytical Support and Sanctions Monitoring Team submitted pursuant to resolution 2368 (2017) concerning ISIL (Da'esh), Al-Qaida and associated individuals and entities," United Nations Security Council, S/2021/655, July 21, 2021.

¹⁹² Hussein and Hassan.

¹⁹⁵ Ibid.

¹⁹⁶ Expanding on the acknowledgments section of this report, the author would like to thank Dr. Ayse Deniz Lokmanoglu for her translations and insights in this section, and her support for the project writ large.

records of NGOs and businesses.¹⁹⁷ Although that alone does not indicate nefarious behavior because they may be registered elsewhere or operate under a different name, the organizations' lack of formal documentation might suggest that they are operating unofficially or underground. Even if they are registered NGOs, or have ties to such organizations, that does not necessarily preclude them from links to terrorism.¹⁹⁸ At least anecdotally, contact information associated with those campaigns suggests that they commonly use Turkish "pay-as-you-go" phones and rely on a variety of methods for moving money. Ideologically, these groups tend not to appear pro-Islamic State, so much as they were anti-PKK (Kurdistan Workers' Party) (i.e., not differentiating between the SDF, entities within the SDF, and the PKK), and pro supporting Muslim women and minors, particularly orphans, held in the detention facilities. Social media records suggest the initiatives provide food, medicine, school supplies, toys, cash, and sometimes support for people looking to escape the facilities. Beyond potential political or moral motivations, monetary incentives and opportunities likely drive these entities most.

Social media monitoring showed that entities occupying a questionable space falling between informal humanitarian organizations, criminal networks, and violent extremist groups also collect money and work to smuggle Islamic State detainees out of the camps. Although the boundaries of this category are hard to define, social media monitoring suggests that these initiatives are some of the most consistent actors when it comes to delivering assistance to detainees in the camps. The Bacin Esir Kampinda campaign, which loosely translates to "Your Sister in a Slave/Prisoner Camp," is a good illustration of this phenomenon. The profile picture associated with the initiative also uses the same background photo as the "Fukku al-Asirat" campaign mentioned earlier, which, again, has supposed ties to al-Qa`ida affiliates in Idlib. The campaign mainly uses Turkish and German in its promotional materials online, and its presence spans across Instagram, Telegram, Facebook, Twitter, YouTube, a website, several WhatsApp numbers, and beyond, where it solicits donations and promotes its work. The initiative appears to be a spin-off or partner to another organization called "Dar'ul Erkam Fisebilillah," and social media monitoring suggests it is part of a bigger scheme linking multiple organizations across a range of social media platforms. An investigative story by SWR news in Germany corroborates this observation.¹⁹⁹ To some extent, the Bacin Esir Kampinda campaign appears to be forthcoming about its activities: translations of content on its main website, for example, said it offers "Captive Extraction, Cash Assistance to Prisoners, Support Line for Families." In another tab, the website provides information about monthly "credit" and "charity" delivery. Further investigation into Bacin Esir Kampinda and its figurehead and founder, a Turkish man called "Yavuz Selim," reveals a messy arrangement involving donations from Europe, Islamic State-affiliated women from the camps smuggled to northwestern Syria and into Turkey, over \$120,000, payouts to HTS,

^{197 &}quot;Non-Governmental Organizations," Sivil Sayfalar website; Turkey's e-Government Gateway website.

¹⁹⁸ For examples, see Ahmet Yayla, "IHH: The Nonprofit Face of Jihadism. An In-Depth Review," International Institute for Counter-Terrorism, May 16, 2019. See also Abdullah Bozkurt, "Turkish ISIS woman from Germany exposed charity outfit IHH's aid to ISIS in Syria," Nordic Monitor, June 18, 2021.

¹⁹⁹ A translated version of the article states: "SWR research shows that 'your sister in the camp' is apparently part of a network of social media platforms whose headquarters are in Turkey and which is close to the Salafist ideology." Ahmet Senyurt and Eric Beres, "German donations for IS supporters?" SWR/Tagesschau, May 6, 2021.

and various allegations of Selim's ties to the Islamic State, HTS, and Turkish intelligence.²⁰⁰ Taken altogether, money and survival, not care for the detainees in the camps, appeared to be the primary focus of Selim and his organization.

Relative to Roj camp, Al-Hol has more options for smugglers willing to help detainees escape from the facility. Smugglers living close to the camp reportedly hang around, lying in wait for whatever business opportunities arise.²⁰¹ As a result, "crime and the 'shadow economy' have progressively taken its grip not only around the camp and into [Al-Hol's] structure but also in the adjacent region."²⁰² Despite having better access to smuggling networks, Islamic State detainees in Al-Hol must be especially careful when coordinating arrangements to get out of the camp. There are numerous references to scenarios where smugglers compromise customers by turning them over to camp security.²⁰³ Although heeding smuggler recommendations from friends and neighbors who successfully escaped Al-Hol may offer detainees some sense of assurance, there is no easy way to know if that smuggler can or will provide the same service to the next customer. Primary and secondary sources suggest that some smugglers attempting to escape.²⁰⁴ On several occasions, Islamic State operatives have conducted targeted hits on smugglers that turned Islamic State detainees over to the SDF.²⁰⁵

Scams

Both primary and secondary sources offer numerous indications that some funds flow out of the detention camps through scammers.²⁰⁶ As discussed above, there are many scenarios where women arrange for a smuggler to help facilitate their escape, and that entity turns the detainees over to camp administrators and security officials. One might characterize some of those examples as scams as well, but financially motivated efforts to defraud Islamic State detainees without efforts to notify security personnel about attempted escape plans happen, too. In some cases, scammers may take payment

²⁰⁰ The figurehead and founder of Bacin Esir Kampinda is a Turkish man called "Yavuz Selim" who supposedly operated in Idlib before going underground for safety reasons. Biographical details about the man are limited, but a short series of YouTube videos featuring Selim offers insight into the life of a smuggler moving Islamic State-affiliated women from the camps to northwestern Syria. Selim explains that he brought Turkish women from the camp to the Syrian-Turkish border around Bab al-Hawa [probably around late 2019 or early 2020], where HTS stopped and questioned him for suspected ties to Turkish intelligence or the Islamic State. Selim claims HTS held and interrogated him in prison in al-Zanbaki, where he denied affiliation to any group, and HTS eventually admitted to arresting and interrogating him because of his efforts to smuggle foreign women. Selim then negotiated terms for his release with HTS, which essentially amounted to regulations on how Selim could smuggle women from the camps, and Selim explained that HTS was controlling who came out of the camps and moved through Idlib. According to Selim, HTS eventually went back on its agreement and stopped allowing him to smuggle women through Idlib because the group was mad that Selim was not smuggling out HTSaffiliated women. Selim claimed to have had around 120,000 USD with him and other funds stowed away for safekeeping when HTS arrested him a second time. In the videos, filmed after Selim's second release from HTS prison, he critiqued HTS' treatment of Muslims, highlighting instances of torture. Then, in an unexpected twist, Selim notes that Turkey is trying him for being part of HTS, and noted the uncertainty of his future. Selim has since gone quiet, though his organization remains highly active. Though anecdotal, this singular case shows the complexity of some of the actors working in this domain who seem to smuggle Islamic State detainees for their financial benefit. See "Suriye / Idlib'ten son açıklama," Bacin Esir Kampinda on YouTube, January 2021; "Yavuz Selim Kardesimizden HTS Hakkinda Önemli Açıklamalar," Bacin Esir Kampinda on YouTube, February 2021; Senyurt and Beres

^{201 &}quot;Operation Inherent Resolve, Lead Inspector General Report to the United States Congress, July 1, 2020 - September 30, 2020," p. 54.

²⁰² Vianna de Azevedo, p. 53.

²⁰³ See Appendix: IMG_1742.PNG, IMG_1924.PNG, IMG_10909.PNG, IMG_10911.PNG, IMG_10914.PNG, IMG_10915.PNG; IMG_10917. PNG. See also "Security forces thwart ISIS escape attempt in Syria's Hawl Camp," North Press Agency, October 19, 2020.

²⁰⁴ See Appendix: IMG_10917.PNG; Coles and Faucon.

²⁰⁵ Zelin; Speckhard, Thakkar, and Ellenberg.

²⁰⁶ See Appendix: IMG_1681.PNG, IMG_10911.PNG, IMG_10914.PNG, IMG_10917.PNG, IMG_10918.PNG; See also "Camp," Caki blog associated with Rojava Information Center, June 16, 2021; Mironova, "Crowdfunding the Women of the Islamic State;" Coles and Faucon.

and simply never deliver the arranged service.²⁰⁷ In other scenarios, scammers facilitate only part of the agreed services, leaving detainees in a lurch to develop alternative plans.²⁰⁸ To offer a potential example, a researcher at the Rojava Information Center reported on the case of a Dutch woman who escaped Al-Hol with her children during a security operation in late March and early April in 2021. On Twitter, Caki explained, "The story around this is she paid a smuggler who got her and the children out [of] the camp ... The smuggler then abandoned them" and so the woman "knocked on the door of a local who let her in."²⁰⁹ According to Caki's reporting, the local eventually called the Asayish to report the woman, which led to her arrest.²¹⁰

On social media, accounts sympathetic to Islamic State detainees often caution women against trusting smugglers and other personnel.²¹¹ Beyond risks associated with being turned over to the SDF or losing money through a scam, Islamic State detainees, and women and minors in particular, including boys and girls, are likely vulnerable to predatory behaviors, human trafficking, and other forms of exploitation. Although there is not much research on this phenomenon in the context of detainees smuggled out of Al-Hol and Roj, the circumstances create opportunities for abuse.²¹² Detainees' reservations about these dangers may deter some detainees from trying to escape, but some women seem willing to take these risks, particularly in Al-Hol.

Other Destinations for Funds

Once women leave detention facilities, they may still draw on their funding networks to support their lives after leaving the camps or help contacts remaining inside the camps.²¹³ A news article citing a U.S. intelligence operative and a Syrian Kurdish official in charge of security at Al-Hol explains, "Wives of senior Islamic State commanders who were first to be smuggled out of the camp relocated to Idlib, the pocket of northwest Syria that has become the group's main haven. The escapees are now playing a key role in rebuilding the group's capability."²¹⁴ During this report's social media monitoring period, one especially notable initiative involved a woman who escaped Al-Hol who seemingly lived in Idlib while raising and moving funds to help other women escape.²¹⁵ On this point, it is worth flagging another consideration. In January 2020, a U.N. report stated the following: "The role of women in raising and transferring funds for ISIL appears to be increasing. Member States reported women transporting significant quantities of gold and gemstones in Iraq and the Syrian Arab Republic, as well as across the borders with neighbouring States. Women have also assumed roles as cash couriers, possibly taking the place of deceased male fighters."²¹⁶ As several sources highlight concerning trends about women's roles in facilitating financial activity for the Islamic State both inside and outside the camps, governments should be wary of overlooking this dynamic.

²⁰⁷ For more context and examples, see "Camp," Caki blog associated with Rojava Information Center, June 16, 2021; Mironova, "Crowdfunding the Women of the Islamic State;" Coles and Faucon.

²⁰⁸ Coles and Faucon.

²⁰⁹ See Caki, "Might as well post this as people keep asking ...," Twitter, April 22, 2021.

²¹⁰ See Ibid.

²¹¹ See Appendix: IMG_1681.PNG, IMG_1742.PNG, IMG_10909.PNG, IMG_10911.PNG, IMG_10914.PNG, IMG_10918.PNG, IMG_2192.PNG.

²¹² See Appendix: IMG_1681.PNG; Jayne Huckerby, "When Terrorists Traffic Their Recruits," Just Security, March 15, 2021; Fionnuala Ní Aoláin, "Gendering the Boy Child in the Context of Counterterrorism: The Situation of Boys in Northeast Syria," Just Security, June 8, 2021; Liesbeth Van Der Heide and Audrey Alexander, *Homecoming: Considerations for Rehabilitating and Reintegrating Islamic State-Affiliated Minors* (West Point, NY: Combating Terrorism Center, 2020).

²¹³ Trew.

²¹⁴ Coles and Faucon.

²¹⁵ See Appendix: IMG_0735.PNG. For more on this example, see also Alexander, "'Help for Sisters': A Look at Crowdfunding Campaigns with Potential Links to Terrorist and Criminal Networks."

^{216 &}quot;Twenty-fifth report of the Analytical Support and Sanctions Monitoring Team," p. 18.

Charitable giving by Islamic State detainees for people and activities outside the camps may be another way funds leave the detention facilities, but it is hard to know the scope and frequency of this phenomenon. As one example, an Instagram account belonging to a woman in Al-Hol who regularly calls for donations for Islamic State detainees in the camp also promoted a fundraiser for a woman outside of Al-Hol. The post stated "Theres a sister we know personally who is in the turkish held prison camp in sahwat lands. She needs to be freed from there before they decide to deport her to a prison in her own country ... I have all the ways of transfer ... we just need a bit more. If anyone can help msg me."²¹⁷ Even without confirming that the account raising money sent it to the subject she mentions, her stated intention to do so is interesting, particularly given that her account usually focuses on raising money for her network in Al-Hol. As a different example, detainees in Al-Hol camp may offer some financial assistance to help smuggle select boys and orphans out of the camps, with intentions that they will train with the Islamic State in Iraq and Syria. Multiple sources indicate that smugglers take boys out of the camps for training,²¹⁸ and given how often fundraising campaigns for Islamic State detainees in the camps generally tout the needs of minors and orphans, at least some funds may specifically support the smuggling of orphans and boys for training purposes.

All in all, funds for Islamic State detainees held in Al-Hol and Roj tend to circulate the camps and eventually leave the facilities. Once they do, some of those resources may ultimately benefit a host of actors with different aims in Syria and beyond. This dynamic can perpetuate instability in Syria and the region because the associated funds build up facilitation networks involving violent extremists, criminals, and corrupt officials. Sometimes, regardless of whether detainees seeking to escape the detention facilities support the Islamic State or not, individuals bribing camp officials and paying smugglers to escape the facilities strengthen networks that violent extremists and other criminal organizations may exploit. Similarly, even as detainees distance themselves from the camps and go on to pay bribes to a range of other entities, they encourage those actors, in turn, paving the way for subsequent activity.

Conclusion

Many governments face numerous challenges from violent extremism at home and abroad, but this report explores why finance-related activities in and around camps and prisons holding Islamic State affiliates in northeastern Syria warrant policymakers' and practitioners' attention now more than ever. The detention crisis concerning Islamic State affiliates in the region is not a new problem, but unfortunately, countless calls to alter the situation have not instigated sufficient action to change its trajectory. Instead, the precarious environment in camps like Al-Hol and Roj begets instability in the surrounding region as the facilities become a public resource tapped by a range of actors. Put simply, detention facilities like Al-Hol and Roj camps pose a security threat because they serve as financial hubs ripe for exploitation by violent extremists, designated terrorist groups, criminal networks, and corrupt officials. Often at a price, numerous entities currently play roles in the movement of Islamic State-affiliated women and minors and other group members. If these logistical networks remain uninhibited, terrorist organizations may easily leverage them to pursue ambitions such as increasing foreign support, moving more people and supplies, or even conducting external operations.

In February, speaking to an audience at the Middle East Institute, CENTCOM Commander General Kenneth McKenzie discussed the ongoing detention of Islamic State affiliates.²¹⁹ Pointing to Al-Hol camp, General McKenzie addressed the composition of the facility, noting the short- and long-term

²¹⁷ See Appendix: IMG_1521.PNG, IMG_2142.PNG.

^{218 &}quot;Operation Inherent Resolve, Lead Inspector General Report to the United States Congress, April 1, 2021- June 30, 2021," p. 12; Coles and Faucon; Mironova, "Life inside Syria's al-Hol Camp"; Seldin, "Islamic State Group Smuggling Boys to Desert Training Camps."

^{219 &}quot;Transcripts: General Kenneth F. McKenzie Jr. Middle East Institute Engagement Feb. 8, 2021."

dangers associated with Al-Hol's current trajectory. Then General McKenzie stated:

"Unless the international community finds a way to repatriate, reintegrate into home communities, and support locally grown reconciliation programs, we will bear witness to the indoctrination of the next generation of ISIS as these children become radicalized. Failing to address this now means ISIS will never be truly defeated, as the ideology will continue well into the future. Addressing this issue requires cooperation among diplomatic, security, and humanitarian channels with a local solution supported by local governments, organizations, and communities. They are the ones that are best placed to support and reintegrate individuals into society. This remains a tough global problem, requiring global resources channeled through regional and local solutions. And it's not going to go away by ignoring it."²²⁰

General McKenzie raises a critical point about the various stakeholders required to address these issues. With these actors in mind, the following paragraphs will discuss how different players may help manage finances flowing into, around, and out of the camps in northeastern Syria. Despite all the challenges the detention crisis in Syria presents, particularly in the context of terrorism financing, there are numerous ways to alleviate the situation.

First and foremost, countries can stifle the terror finance threat emanating from these facilities by offering detainees formal pathways out of the camps wherever possible and supplementing such efforts with measures to alleviate strain in the detention facilities. While simultaneously complicated and straightforward as a policy prescription, the repatriation of foreign nationals with links to the Islamic State is arguably the most sustainable way to curb donations and remittances hailing from abroad. The plight of foreigners in the camps draw a steady stream of sympathy, often in the form of funds, and the continuity of the humanitarian and security crisis only legitimizes the demand for external funding. Finding lawful ways to move Islamic State detainees out of the facilities will reduce the flow of donations, which will help prevent foreign funds from enabling the escape of Islamic State detainees. Over two years after the fall of Baghouz, countries must recognize that the security challenges invited by these circumstances will be less tolerable and more taxing than short-term interventions such as repatriation, even if said intervention is politically unpopular. In the eyes of violent extremists and criminal networks, the camps represent an opportunity-rich environment ripe for exploitation. States that overlook that perspective and dismiss the camps' potential to offer resources to bad actors could likely face repercussions for their negligence.

Second, and related, relevant stakeholders must aim to curb detainees' desire to escape and identify populations at risk of attempting escape. By reducing detainees' incentives for escaping, relevant stakeholders can also restrict the amount of money leaving the camp through smugglers. When people escape from the camps, the funds used to facilitate that activity goes to various actors, including corrupt guards, criminal networks, and violent extremist groups. This dynamic is dangerous to the region and the international community because these entities exacerbate instability in the region and fund violent extremism and criminal enterprise. Prioritizing improvements within the facilities, including increasing access to humanitarian assistance and other essential goods and services, is a critical step in this process. In addition, administrators, security personnel, and humanitarian workers within the camp could use strategic communications and information campaigns to highlight the risks of attempting to flee the camps.

Third, increasing camp security and developing a clearer picture of dynamics and networks in and around the detention facilities can help reduce the number of Islamic State-affiliated adults and minors escaping from the camps. More information may also create more opportunities for repatriation, as efforts to document people in the facilities are incomplete. Given that corruption among some personnel working in the camps is an ongoing issue, entities administering the camps and coordinating

camp security might develop and implement anti-corruption measures. In the context of countering terrorism financing and smuggling operations, officials who help identify and disrupt smuggling attempts may get a portion of the funds seized from the operation. On this point, the camps might ultimately benefit from greater financial intelligence capabilities to help determine which networks are financially enabling nefarious activities in the detention facilities.

Fourth, wherever possible, security personnel in the region should look for ways to alter the operating environment of entities that enable the escape of Islamic State detainees and deny said detainees opportunities to pay their way out of their situations. There are multiple routes out of Al-Hol, and as discussed earlier in this report, a range of actors rise to meet the demands associated with various parts of the process. Local security forces, potentially with support from partners, could collect intelligence and target criminal networks creating fake documents, financial facilitators moving and masking money, corrupt guards, and smugglers that bribe a range of other entities.

Fifth, security officials and policymakers beyond Syria can identify, disrupt, and prevent the transnational movement of funds for Islamic State detainees in the camps. Such efforts can be multidimensional, involving domestic, bilateral, and multilateral approaches. Members of the Global Coalition, for example, can use their respective authorities to undercut logistical networks that help move illicit funds into the camps and share information and good practices with other member states. The Financial Action Task Force (FATF) can continue developing and promoting policies and guidance to protect the global financial system, particularly in the context of emerging trends and technologies concerning terrorism financing.²²¹ As this report demonstrates, money moving into, around, and out of the detention facilities in northeastern Syria for Islamic State affiliates is a fundamentally transnational issue. Targeting the sources of funds may offer some promise given the opportunities for cooperation between security officials, international organizations, and the range of investigative and legal tools that might help reduce the flux of funds going into the facilities. Activities under this domain might involve disrupting crowdfunding networks and facilitators moving money for Islamic State detainees.

Sixth, there is a role for social media and financial technology service providers, among other entities, in the fight against terrorism financing activity involving the camps. Some policymakers might argue that crowdfunding platforms are responsible for preventing the abuse of their platforms, and thus tasked with disrupting nefarious uses of their tools. This policy prescription may sound appealing, but crowdfunding and other financial technology platforms cannot feasibly address this problem in isolation. Beyond the reality that fundraisers and donors can always switch to alternative platforms, the clandestine nature of the crowdfunding activities can make it hard to detect campaigns without context and deeper levels of analysis. For example, even after tracking some campaigns for over a year, it is still hard to determine who crowdfunding initiatives for populations held in camps benefit. Consequently, the private sector must be diligent and discerning when combating the exploitation of crowdfunding platforms, social media, and other tools because imprecise disruption could have unintended consequences such as stifling charitable giving done in good faith. Organizations like Tech Against Terrorism and the Global Internet Forum to Counter Terrorism may help improve companies' awareness of and responses to illicit efforts to raise, use, move, or obscure funds for members of violent extremist groups. Ultimately, since multiple institutions in the private and public sectors hold information necessary to deconstruct these networks, such as technology providers, banks, and government agencies, stakeholders must pool their resources and collaborate to create a more complete picture of the problem.

The issue of finances moving into, around, and out of the camps holding Islamic State affiliates in Syria is arguably a byproduct of languid and stifled efforts to alleviate the detention and humanitarian crisis in the region. In the battles for cities seized by the Islamic State, security forces, security advisors,

²²¹ For more on this consideration and others, see Keatinge and Keen.

and counterterrorism specialists noted how entrenched the Islamic State was after years in those areas and highlighted how it complicated efforts to beat back the group. The Islamic State members held in Al-Hol and Roj who emerged from Baghouz in 2019 have been in the facilities for over two years, and other Islamic State affiliates have lived in the camps for even longer. Applying lessons learned from the fight against the Islamic State and its predecessors, these entities are resilient, and the longer individuals live in areas, the more entrenched their networks become. That entrenchment benefits the Islamic State and the range of violent extremist and criminal actors there, undermining gains made in the fight against the Islamic State. All in all, although curbing terrorism financing is a daunting issue, there are numerous opportunities where states can disrupt this activity. Far beyond the risks of creating the next generation of jihadis, failing to alter the current trajectory of detention facilities in northeastern Syria holding Islamic State detainees will have short-, medium-, and long-term implications for security in the region and beyond.



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AT WEST POINT