

1. Executive Summary

Southeast Asian region today faces increasing intensity of terrorism threat and terrorist attacks along with the threat of global terrorism. It also demonstrates the importance of funds to the terrorist groups in carrying out their organisational and operational objectives. Such situation implies the greater need for cooperation between multiple sectors, such as financial institutions, law enforcement agencies, other government institutions and financial regulatory sector.

Southeast Asia continues to struggle to disrupt the extensive terrorist financial network due to weak domestic legislation, resource strapped financial investigative agencies, poor enforcement capacity and the lack of political will. Previously, Al Qaeda has provided financial support and expertise to Jemaah Islamiyah in South East Asia and post 9/11 attacks on United States sees America declaring and initiating the global war against terrorism, to disrupt the Al Qaeda terror network as well as its financial network. The financial vulnerability requires Al Qaeda's operational cells and other Al Qaeda's inspired groups to self raise their own funds by subsequently resorting to criminal activities.

The report describes the various ways employed by the terrorist groups in raising and distributing funds within their network. The funds are raised through the exploitation of charitable organisations, business set-up and criminal activities, and to be further distributed or laundered through the misuse of banks, alternative remittance system and cash courier. A summary of companies and organisations linked to terrorist groups such as Jemaah Islamiyah and other Southeast Asian groups is included in the appendix section.

Understanding of these concepts should benefit law enforcement agencies as well as financial institutions to gain better awareness over roles they can play to combat terrorism financing. It will also help contribute to the effort in developing financial and non-financial indicators or Counter Financing for Terrorism guidelines.

2. Terrorism Financing in Southeast Asia

Southeast Asian region has long been considered permissive environment for the establishment of terror network, including financial network for groups such as Jemaah Islamiyah (JI), which has strong alliance with Al Qaeda (AQ). Some of the main reasons include, weak domestic legislation, resource strapped financial investigative agencies, poor enforcement capacity and the lack of political will.

Bali bombings, Australian embassy bombing in Jakarta and JW Marriott Hotel bombing in Jakarta were masterminded by JI, the regional terror network. Following these attacks, governments in Southeast Asia have done a lot in arresting and stripping the JI network. Through to September 2003, about 200 JI members had been arrested in Singapore, Malaysia, Indonesia, Philippines, Thailand and Cambodia. Several key leaders such as Hambali, Abu Jibril, Agus Dwikarna, Azahari Husin had either been arrested or killed, creating massive blow to JI's whole organisation, financial capability and network, however given the strong ideology linkages with Al Qaeda, the level of threat continues to increase.

Financial sector does have important role to play in the global war against terrorism, by setting up robust AML / CFT (anti money laundering / Countering the financing of terrorism) compliance program in order to create hostile environment for terrorists as well as other financial criminals to exploit any weakness within the financial system. The role of financial sector has to be an integral part of the overall strategic counter terrorism initiatives, along with law enforcement sector.

There are still plenty to do for other financial regulatory regimes in other countries in Southeast Asia. Myanmar remains the only country, which is still in the FATF (Financial Action Task Force) watch list. For other economies, combating financial crime sits in different level of financial priorities unfortunately, contributing to implementation issue such as uneven level of playing field.

3. Cheap Terrorism – Insight into Terrorism Financing

In August 2004, UN Monitoring Team report on al-Qaeda and the Taliban came up with estimation for the costs of various terrorist attacks, as follows:

- Madrid train bombings, March 11, 2004: \$10,000
- Istanbul truck bomb attacks, November 15 and 20, 2003: \$40,000
- Jakarta JW Marriot Hotel bombing, August 5, 2003: \$30,000
- Bali bombings, October 12, 2002: \$50,000
- USS Cole attack, October 12, 2000: \$10,000
- East Africa embassy bombings, August 7, 1998: \$50,000

These figures create a perception that terrorism is cheap and raises questions such as how the banking sector can play important role in detecting those small amounts attributed to terrorist financing. This incorrect perception of cheap terrorism could take away the attention in creating effective counter measures on terrorist financing, therefore there is a need to raise greater awareness to look into the greater picture of the overall terrorist financial network.

The use of funds by terrorist organisations can be classified into two main categories. They are the organizational and operational use of funds. The small amount of funds involved in terrorist attack is classified as operational funds or the funds incurred during the final preparation prior to an attack, such as cost of purchasing explosive materials.

Organisationally, terrorist organisation do requires funding on other purposes and not only those expenses that incur in the days and weeks before the attacks. In fact, the operational cost is estimated to be only about 20 percent of the overall funding requirement. Terrorist group need funds for other expenses such as:

- Setting up and maintaining front / shell business organizations
- Travel expenses for senior members for meetings and others
- Training expenses for the terrorist operatives in various skills, such as bomb making, hijacking, assassination and others
- Renting safe houses, and possibly turning these into bomb making factory and indoctrination centre
- Maintenance of communication network with other groups and cells
- Bribery expenses on local officials
- Purchases of equipments such as camera, computer and so on

To counter terrorist financing, it is important to look at both organizational and operational costs. The focus on organisational cost allows financial investigators broader picture into the terrorist network as it involves more actors and leads upstream to financial donor and downstream to operational cells.

4. Sources of terrorist funds - Southeast Asian perspective

Funding to Terrorist organization allows itself to survive operationally and organizationally. South East Asia region remains appealing to Terrorism Financing, because of the network of Islamic charities, poorly regulated Islamic banks, business friendly environment, and economies with extensive money laundering record.

Primary sources of terrorism financing include:

- Funds skimmed from Islamic charities
- Revenues generated from legitimate business
- Gold and gem smuggling
- Contribution from JI own members and outside supporters
- AQ investment and accounts in Islamic banking system
- Criminal activities

Other sources of funding include:

- Provision of Training Camps and Activities
- Cultivation and Smuggling of Narcotics
- Illegal logging

Once funds are obtained, their funds movement is facilitated through the use of cash couriers, the alternative remittance system or also known as Hawala system, and also formal banking cross-border remittance channel. The advanced technology in banking sector such as the use of Automatic Teller Machines (ATM), internet banking, cyber-payments also contributes to the efficiency in funds movement within the terror network.

The following section describes more details on various key sources of terrorism financing in Southeast Asia.

4.1 Islamic Charities

Much of the Southeast Asia regional terror network or Jemaah Islamiyah's (JI) funding come from charities, either unwittingly or intentionally skimmed off. This is made possible because JI and Al Qaeda inserted top operatives into leadership positions in several Islamic charities in South East Asia in late 1990s. KOMPAK, an organisation originally set up as a charity to provide aid to the displaced, became an important source of funds for the purchase of arms, and producer of recruiting videos on Ambon and Poso used for JI recruitment purposes

The Indonesian intelligence has estimated that between 15 to 20 percent of Islamic charity funds are diverted to politically motivated terrorist groups, while in the Philippines, the figure is between 50 to 60 percent.¹ The abuse of Saudi based Islamic charities, which have prominent presence in Southeast Asia also play significant role in Terrorism Financing.

4.2 Contribution from JI own members and outside supporters (Zakat / Infaq)

One of the most constant and important incomes for Jemaah Islamiyah was donation from their members, outside supporters and also the 10 percent of revenue of its legitimate businesses channelled to JI's Infaq Fisbillah fund.

Zakat or charitable giving is one of the pillars in Islamic faith. Zakat has a broader meaning than the western ideas of charity, as it also functions as a form of income tax, educational assistance, foreign aid, and political influence. The Western world sees civic and religious duty as two separate matters, while in Islamic culture, this separation does not exist.²

In Singapore, the state investigators on detained JI members believed that 25 percent of these funds were given to the Malaysian cell and 25 percent to the Indonesian cell. The remaining funds were used by the Singaporean cell for equipment, operations, and overseas training, as well as donations to the Taliban regime³

¹ Abuza Zachary, "Funding Terrorism in Southeast Asia: The Financial Network of Al Qaeda and Jemaah Islamiyah," *NBR Analysis*, Vol. 14, No. 5, (December 2003),

² National Commission on Terrorist Attacks upon the United States, Monograph on Terrorist financing

³ Source: Abuza Z

Other financial support also came from overseas. Laskar Jihad in Indonesia claims that its military operations are funded by donations given in mosques, street collections and internet pledges. Some other funding comes from overseas such as USA, Saudi Arabia, Malaysia, Singapore, Middle East and other fellow Muslims overseas.

4.3 Revenues generated from legitimate and shell businesses

Terrorist groups need to not only obtain money but also to sustain the supply of money overtime. Southeast Asia had one of the fastest growing economies in the world in early to mid 1990s and had business friendly environments, which in turn provide opportunity for the terror groups to set up legitimate businesses to generate revenue. Legitimate business is often referred to as Shell or Front Companies.

Jemaah Islamiyah's most important businesses were setup by the Malaysian cell, as Malaysia offered favourable business environment in early 1990s and encouraged investment. Companies were setup at a rate of more than one a year between 1993 and 1996. One of the legitimate business, known as Green laboratory medicine, a bio-medical lab, was instructed to purchase 21 tons of ammonium nitrate for use in planned terrorist attacks in Singapore back in 2001.

Other type of legitimate business in South East Asia that contribute to the Terrorism cause also includes trading companies, courier services, nursery schools, kindergartens, orphanages and school across South East Asia.

It remains a huge challenge to stop unknown number of legitimate business setup to move money around globe, which can be misused for terrorism. With the advance of electronic money transfers, easy formation of companies and deregulation, money laundering has escalated to an estimated \$2,500bn each year. US itself plays an important role, where its banking systems are misused to integrate about half of those dirty money.

Apart from legitimate business, terrorist groups also make use of shell business. Shell business refers to those companies, which virtually have no assets, employees, physical

presence or trade. Large sums of money pass through their bank accounts, and the movement of the illicit funds could be facilitated by banks, accountants, and lawyers.

4.4 Gold and Gem Smuggling

Financial Action Task Force (FATF) sees the high intrinsic value, convertibility and anonymity in transfers, in gold and gem smuggling, thus making it more attractive as cover. Gold and Gem smuggling allows a terrorist cell to raise funds, hide money targeted by financial sanctions, launder profits of criminal activity and convert cash into a commodity that holds its value and easily transportable. ⁴

The situation is compounded because of the inability to ascertain the origin of stones. Customs agents are incapable of differentiating a Myanmar ruby from a Thai ruby, for example, because they are not gem experts and they also have very little ability to estimate the value of a stone, so importers can vastly under-declare the value of an item to avoid the import taxes that are applied to all merchandise.

4.5 Criminal Activities

Today, with US leading the global war on terrorism, the linkages between central Al Qaeda with its networks in other countries are diminishing. Ideological association is the only remaining link today. On top of this, especially after 9/11 attacks in America, banks are also increasingly more stringent in implementing their AML/CFT compliance program, making it more hostile for financial criminals to exploit their systems.

Given this situation, terrorist groups need to resort to other types of fund raising methods such as criminal activities. It may seem odd at times, that terrorists would put their entire organization and operations at risk by engaging high-risk criminal activities hence disclosing their identities.

Criminal activities provided authorities with the first break in uncovering JI's network in months before 11 September 2001. Crime activities linked to Bali bombing include robbery of jewellery shops, credit card theft, and bank robbery, as indicated in the diagram below.

⁴ Source: Abuza Z.

Case 1 – Bali Bombing, Source and flow of terror funds

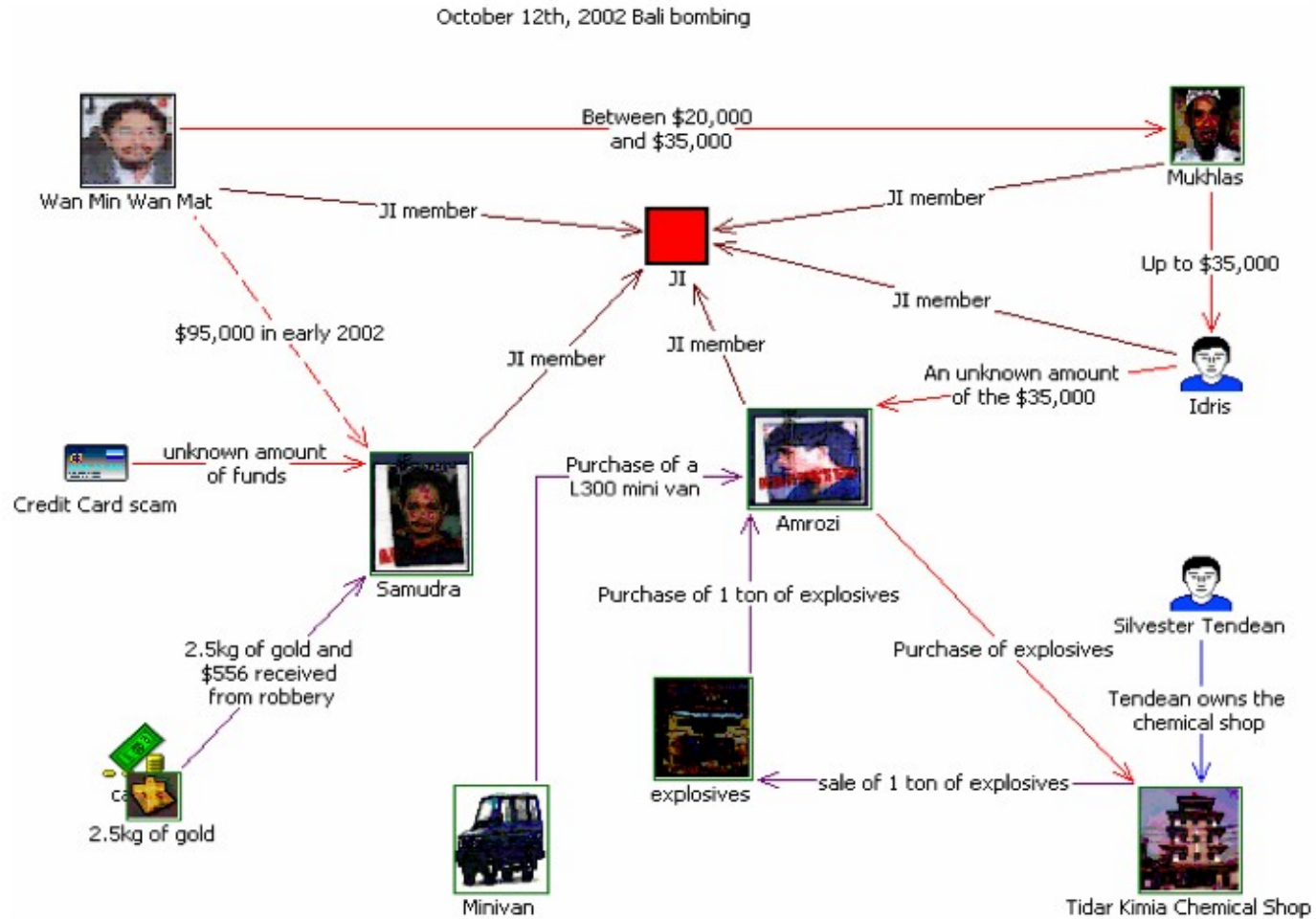
The October 12th 2002 Bali nightclub bombing which killed 202 people was Jemaah Islamiah's deadliest attack. A large portion of the funds for the operation came from a Chinese Malaysian JI operative. Between US\$20,000 and US\$35,000 originated from him and ended up in the hands of JI operative Idris.

The money was used to purchase a Mitsubishi L-300 minivan as well as ammonium nitrate, potassium chlorate, aluminum powder and sulfur. The chemicals, altogether weighing one ton, were purchased at the Tidar Kimia chemical shop in East Java. The owner of the shop, Silvester Tendean may have been aware of the Bali bombers' activities when he sold the chemicals. He was imprisoned for six months.

In addition to outside sources of funding, the Bali cell engaged in criminal activities for cash. Imam Samudra earned cash with a credit card scheme. He stole the card numbers, purchased goods online and then sold the purchases. Samudra also directed the robbery of a gold shop in West Java that netted him 2.5kg of gold and US\$556.

After this operation, authorities began to crack down on JI's support structure. Even before JI was forced to adjust its means of funding, cell members resorted to risky ventures for funds.

Diagram 1 – Source and funds flow in Bali Bombing 1



Below are some of the common criminal typologies in Southeast Asian context.

4.5.1 Provision of Training Camps and Activities

Due to the Moro Islamic Liberation Front's (MILF) control of many parts of southern Philippines, they are able to conduct training camps for regional terrorist groups, Al-Qaeda members and other jihadists.⁵ Jemaah Islamiyah has transferred funds to the MILF in return, for training facilities in southern Philippines.⁶

4.5.2 Cultivation and Smuggling of Narcotics

The other MILF's main source of funding is narcotics. The MILF is in control of areas in central and western Mindanao that produce marijuana and is also involved in the transit point of its marijuana and crystal methamphetamine from North Korea.⁷

4.5.3 Intellectual Property Rights violation

The banking industry is exposed to significant risks of money laundering and terrorist financing of the proceeds of IPR theft. In 2003, the Financial Action Task Force (FATF) listed "counterfeiting and piracy of products" as one of the 20 minimum predicate crimes for money laundering. This category covers a range of businesses impacted by IPR theft from tobacco, apparel, pharmaceuticals, movie, music and software industries and presents a new dimension of AML /CFT compliance for financial institutions.

Each year, IPR theft erodes the market for genuine goods and services. Local companies, multinational companies and governments lose billions of dollars and innovation suffers. According to an Interpol report, global narcotic trade estimated at more than USD 322 billion, while combined global piracy and counterfeit trade are estimated over USD 650 billion.

Terrorist groups find trading in counterfeit or pirated goods as an easy way to finance their operations with low entry costs and high profit margins. Islamic terrorist groups linked to counterfeit and piracy industries in Pakistan and Turkey are financed this way. Intelligence agencies in Thailand and Philippines have also been investigating terrorist groups involved in the pirated and counterfeit good smuggling from Malaysia and Indonesia.

⁵ Bonner, R, "Philippine Camps are Training Al-Qaeda's Allies, Officials Say", New York Times, 31st May 2003.

⁶ www.chinaview.cn "US Envoy in Philippines calls southern island "Mecca of Terror" ", 10th April 2005.

⁷ Ewing, W. & Joshi, S., "Moro Islamic Liberation Front", 17th November 2004.

4.5.4 Illegal logging

Following its "split" with the MNLF in 1991, the Abu Sayyaf Group (ASG) resorted to illegal logging apart from kidnapping, bombing, looting, burning, killing and other criminal activities for its logistics and operations. So far, they have kidnapped at least 32 foreigners, including five Americans, Europeans and Asians. This does not include hundreds of other Filipino hostages, a number of whom were Catholic and Protestant priests and nuns.⁸

THE New People's Army (NPA), the military wing of the Communist Party of the Philippines (CPP), receives a hefty sum from illegal loggers operating within areas controlled by the communist movement, said a former rebel who now heads the government's reforestation program. NPA gets most of its funding from taxes collected from loggers operating within rebel-controlled mountains in Luzon. Not only this illegal logging has links with terrorist groups, but also it creates environmental problems such as landslides and flooding caused by tropical storms.⁹

4.5.5 Kidnapping and extortion

The Abu Sayyaf group (ASG) in Philippines provides good indication on the link between terrorist group and crime. In early 1990s, it was well funded by funds skimmed from Al Qaeda linked charities and by 2000, when they have lost most of their international funding, they started engaging in kidnapping and extortion

The three major incidents that brought renewed attention to this group, include:

- March 2000, ASG kidnapped 55 people: school children, teachers, and a priest in Basilan
- April 2000, ASG kidnapped 20 foreigners and one Filipino from a diving resort on the Malaysian island of Sipadan. Ransom payments from this kidnapping venture contribute US\$ 4.4 million dollars to ASG
- May 2001, ASG kidnapped 30 tourists from the Don Palmas diving resort on Palawan. Total ransom payments received totalled at US\$ 356,000 dollars.

⁸ Santuario. E, Abu Sayyaf: The CIA's Monster Gone Berserk, Human rights network on the net, www.hrnw.org

⁹ Corpus: NPA conniving with illegal loggers, Manila Times, 2004 Dec 07, <http://www.manilatimes.net/national/2004/dec/07/yehey/metro/20041207met4.html>

In addition to kidnapping, the ASG engages in extortion, taxes from peasants, fishermen, coconut growers, and businessmen. Extortion has been a lucrative business for ASG members to gain funding while planning for their operations and other means of fund raising. ASG also sources income from marijuana cultivation, provision of terrorist training camps, supply of arms and weapons, illegal logging and many others.

5. Movement of funds

The following section focuses on the three key methods used by terrorist financiers in distributing the terror funds within its network. It ranges from most sophisticated method through the exploitation of financial facilities provided by banking sector to traditional method such as cash courier.

5.1 Bank.

Terrorist financiers exploit the weaknesses within banking or other financial systems in order to launder or distribute the terror related funds to its network. Despite the stringent measures introduced in the banking sector such as “know your customer” process and customer due diligence process, terrorist financiers continue to make use of banking channel globally.

Innovative financial products introduced for banking customers are not designed to capture financial criminals, but to allow more flexibility and ease of carrying out financial transaction. The fast pace in globalisation of financial flows, existing regulatory regimes face the risk of being outraced by new money transfer products and technologies. These new banking products often pose new level of risk to the Banking sector. Bank accounts offer a relatively secure and efficient means of storing and moving money among people, within countries, and around the world. These benefits increase as technological and economic integration increases as part of the ongoing process of globalization.

Case 2 - Australian Embassy-Jakarta Bombing

The September 9th 2004 bombing of the Australian Embassy is believed to have been financed from the funds that Noordin Mohammad Top kept from the Marriott bombing. It is not clear whether additional funds were used. However, it is believed that at least some of the funds went through an east Jakarta branch Bank Permata bank account in the name of CV Sajira Media Karsa.

CV Sajira is also the name of a courier company owned by Iwan Darmawan. Darmawan, who assisted Azahari and Noordin, probably opened the account. His firm might also have been complicit in aiding JI move cash around. Three days before the bombing, one of the cell members purchased a Daihatsu Zebra minivan that was used to deliver the bomb to the embassy. Investigators believe that 200kg of potassium chlorate were used in the bomb. It is possible that the explosive may have come from the transfer of explosives to Jakarta in July, 2003.

5.2 Alternative remittance systems

Hawala is commonly referred to as alternative or parallel remittance system. It exists and operates outside of, or parallel to the formal banking or financial channel, and is currently a major remittance system used around the world. Estimates on the annual flows through the informal banking sector around the globe vary from the United Nation's estimate of US\$200 billion to World Bank's figure of tens of billions of US dollars

Apart from cost effectiveness and efficiency, other reasons that motivate the use of Hawala include:

- Lack of bureaucracy for those without proper identification, and no questions asked on the purpose of the money remittance
- Lack of paper trail, as the Hawaladars rarely keep records of individual transactions

Today in Southeast Asia, most hawaladars are not legally recognised, however it is important to acknowledge that they are here to co-exist and can provide services outside the formal banking service coverage. It is also important to include them as the regulated sector together with formal banking channel, in order to ensure cooperation and greater awareness of their role in overall counter terrorism strategy, so as to avoid being exploited by financial criminals including terrorist financiers.

5.3 Cash Couriers

Given the more stringent measures imposed by banking sector on its customers, terrorist financiers are resorting back to traditional methods of funds distribution such as cash courier. Within Jemaah Islamiyah's network, deliveries of cash by personal couriers within a country or into another country represent the most direct and easy way of funding.

In Bali bombing operation, personal couriers who were not even JI members, were involved, where Wan Min Wan Mat transferred USD 15,000 via Indonesian labourers working in Malaysia, as indicated in diagram 1. The following case shows the source and fund flows for the JW Marriott Hotel bombing operation.

Case 3 - JW Marriott Hotel Jakarta Bombing, Source and Money Trail

The financing for the August 5th 2003 JW Marriott Hotel bombing in Jakarta began sometime between December 2002 and February 2003. Al Qaeda operatives passed US\$50,000 to Rusman Gunawan while he was in Pakistan. Gunawan, a JI operative is also Hambali's younger brother. At the request of his older brother, Gunawan sent the \$50,000 via numerous couriers to Indonesia. At one point the money was even mailed. Before the Marriott bombers received the money, Amar al Baluchi, an al Qaeda operative who aided in transferring the funds removed US\$20,000 for unknown reasons.

When Ismail, a JI operative for the cell received the money he purchased two motorcycles and a Kijang truck that was used to transport the bomb. He also rented a house in South Jakarta for master JI bomb maker Dr. Azahari Husin and JI money man Noordin Mohammad Top. Most likely it was Noordin who instructed Ismail to make the purchases. Top and Ismail went to southern Sumatra to pick up the explosives and transfer them Jakarta. It is not known how or from whom they acquired the explosives. In July 2003 one ton of explosives were shipped from a JI safe house in Semarang central Java to Jakarta. Local police are unaware of its location. It is possible that some of these explosives may also have been used in the attack. It is also possible that they were stored for use in future attacks. The remaining cash was given to Noordin who left with it after the bombing.

6. The terrorist financial network resiliency

United Nations through its Security Council Resolution 1373 introduced in 2001, has provided leadership in criminalising terrorist financing act and FATF (Financial actions task force), an inter governmental body that oversees the implementation of the financial crime related measures, has given the guidance and recommendation to the financial sector globally in tackling this problem. However with all these initiatives going on, the threat of terrorist attacks and deadly attacks continue to haunt our society, giving weight to the argument that the terrorist financial network remains resilient and they are still able to freely raise, store, move and use their funds in carrying out deadly terror attacks. One main reason behind this is the availability of permissive financial environment for the terrorist financiers.

There are several key issues that can explain the implementation issues faced by different jurisdictions. These issues include:

- Different jurisdictions with uneven progress of compliance. Different jurisdictions have different economic priorities, political agenda and unfortunately not all are putting financial crime on top of their list as either short or long term objectives. Furthermore, there is a major difference on definition of terrorist in different jurisdictions. For example, United Nations sanction list has a very small percentage of the known Al Qaeda's world, hence if a particular group is not listed under UN list but is listed under US list, then there is legally no obligation to act, such as freezing the account.
- Various attitudes within banking sector shown towards terrorist financing. The commitment shown to fight terrorist financing by having robust compliance program in place often raises issue on uneven level of playing field for banking sector. It is believed that robust compliance program could be anti-competitive, so banks would only fulfil the minimum standard as required by the financial regulator.
- Financial, Technology and Human resource constraints. Building stringent AML/CFT regime not only costs money, but also required good human resources who are able develop financial intelligence, has monitoring and detection capability and are able to cooperate effectively with various key stakeholders.

7. Conclusion

Terrorist attacks and threat of terrorist attacks will continue to haunt us for long. Despite all difficulties and issues faced in combating financial crime, including terrorist financing, it is important to that all sectors in the society, such as financial institutions, law enforcement agencies, financial regulator, academic research centre, vendors, and the general public have active roles in countering threat of terrorism, as responsible members of the society.

There are two critical success factors in combating terrorist financing, which are the development of stringent and robust CFT compliance regime and the active partnership between the sectors mentioned above. These factors must be demonstrated not only in domestic level but must be extended to regional and even global level.

APPENDIX 1 – Primary Sources of Terrorism Financing in South East Asia

Country	Organisation Name	Category	Description
Malaysia	<i>Infaq Fisbilillah</i> fund	Islamic Charity	Jl-run Islamic Charity, received 10 percent of revenues contributed by other Jl run firms.
Malaysia	CV Sajira	Courier Company	Believed to have been involved in the Australian Embassy bombing, by providing funds to Jl Operatives
Malaysia	Al Risalah Trading	Trading Company	A legitimate organization awarded a license to bid for government contracts, for works such as pipes installation, providing supplies to school and building schools.
Malaysia	Pertubuhan al Ehasan (PAE)	Islamic Charity	From 1998 until its closure in 2002, PAE was able to raise approximately US\$200,000 from Malaysians who were unaware of the true purpose of the funds. Funds were channeled to purchase weapons and fund Jihad activities in Maluku.
Malaysia Indonesia Singapore	Jl Members	Donation from members	At the end of the 1990's members living in Singapore were required to pay 5% of their salaries to the organization. 25% of the money went to Jl in Indonesia and another 25% went to Jl in Malaysia
Indonesia	KOMPAK	Islamic Charity	Largest Islamic charity organization set up in August 1998 in Indonesia with several Jl members in its ranks to address humanitarian needs from sectarian conflict in Maluku. Aid was extended to Aceh and Poso. Funds were used to buy weapons for Jihadists, and 13 representatives of KOMPAK were senior Jl members.
Cambodia	Om Al Qura Foundation	Islamic Charity	Has offices in Bosnia, Somalia and southern Thailand. It funded Islamic schools, and is believed to have laundered several millions dollar for Al Qaeda.

Country	Organisation Name	Category	Description
Malaysia	Green Laboratory Medicine	Medical laboratory	Owned and run by Yazid Sufaat, US trained scientist recruited by JI
Malaysia	Konsojaya	Trading company	A shell company co-founded by Hambali. It funneled money and material assistance to several regional militant Islamic plots
Malaysia	Infocus technology	IT company	Led by Yazid Sufaat, linked with Zacarias Mussaoui
Malaysia	Secure Valley	General Trading company	Another JI owned front company set up in October 1996.
Malaysia	MNZ Associates	Security Company	Did auditing for most JI/AQ front companies in Malaysia
Malaysia	Koperasi Belia Islam	Islamic Financial Institution	JI linked front company
Malaysia	Excel Setia	Trading company	Based in Labuan, it was used to fund JI and training of JI members
Malaysia	Gulf Shores Sdn bhd	Construction Company	JI linked front company, with office in Johor Baru.
Malaysia	Aliran salam	Kindergarten / Nursery	Selangor based institution, established in April 1996, and was involved in money laundering activities across Southeast Asia
Malaysia	Shafatex Niaga	Trading Company	20% owner of Aliran Salam, with Zulkifli Marzuki was its secretary.
Philippines	Benevolence International Corporation	Islamic Charity Organisation	A sister company to BIF, a Saudi based charity organisation. BIC was set up as an import export business in the Philippines by Mohammed Jamal Khalifa, who also headed the Philippines IIRO office
Philippines	IIRO	Islamic Charity organisation	A cover organization that includes orphanage, dispensary, pharmacies, funding school and scholarships, with proper official approval IIRO also used to distribute funds for purchase of arms and other logistical requirements of ASG and MILF. Only 10-30 pct of the funding goes to legitimate relief and livelihood projects.

Country	Organisation Name	Category	Description
Philippines	Medical Emergency Relief Charity (MERC)	Islamic Charity Organisation	Saudi based Islamic charity organisation, that funded the jihadists in Ambon and Poso.
Philippines	International Relations and Information Centre	Islamic Charity Organisation	Involved in livelihood projects, job training (farming), orphanages, Islamic schools and social work. IRIC funded the Bojanka Plot.
Philippines	Fi Sabilillah Da'Wah Media foundation	Islamic Charity Organisation	Headed by Ahmad Santos, who is on the run. It is active in Northern Philippines.
Philippines	World Assembly of Muslim Youth	Islamic Charity Organisation	One of the Saudi based Islamic Charity with major presence in Southeast Asia.