

# The Metamorphosis of Ali Khalil Merhi

How a One-Time Fugitive  
Found Fortune  
in South Sudan

April 2021



THE SENTRY  
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## Table of Contents

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<u>Executive Summary</u>	1
<u>Unmasking Ali Khalil Merhi</u>	4
<u>The “Megapirate” of Paraguay</u>	6
<u>Sanctuary and Success in South Sudan</u>	8
<u>Disrupting Kleptocracy, Improving Security</u>	12
<u>Endnotes</u>	16

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## Executive Summary

When Lebanese businessman Ali Khalil Merhi fled Paraguay while awaiting his trial and crossed the border into Brazil in 2000, he escaped mounting scrutiny from authorities. Fresh off a stint in the notorious Tacumbu Penitentiary, Merhi faced piracy charges and suspicions of links to terror financing. At the time of Merhi's flight from Paraguay, Argentinian prosecutors also wanted to question him about a deadly terrorist attack that had left 86 dead in Buenos Aires in 1994.

Though the authorities initially investigated Merhi, the trail went cold and the investigation in Paraguay faltered. Meanwhile, Merhi moved on to new terrain. Within 20 years, he had obtained a new passport under the name Ali Khalil Myree, established more than a dozen new companies, and cultivated a new network of powerful government contacts—all in the world's newest nation.

The Sentry found that for more than a decade, the government of South Sudan has supported the Lebanese tycoon, granting him citizenship, lucrative contracts, and even the title of honorary consul. Since his flight from Paraguay, the newly minted Myree has established himself as one of the most powerful businessmen in South Sudan's capital of Juba. Along the way, he has registered more than a dozen companies, received public accolades, and partnered with politically exposed persons (PEPs), including the daughter of the president and the daughter of the former director general of the General Intelligence Bureau.

For organized crime groups, smugglers, and suspected terrorist financiers, kleptocracies like South Sudan can provide a safe haven. By cultivating the support of powerful government officials who prioritize their economic interests over the rule of law, businesspeople can conduct their operations with little scrutiny. In South Sudan, meaningful consequences for misconduct have been few and far between for suspected criminals and their government collaborators alike. The result is a prevailing environment of impunity.

The challenge, however, involves more than just a single suspected bad actor. Rather, systemic issues make the nation an attractive refuge for suspected criminals.

### Key Recommendations

As this investigation has revealed, state capture in South Sudan threatens national security. Eliminating such grave risk requires the implementation of a coordinated strategy that prioritizes the integrity of the banking sector, corporate transparency, public oversight, and, most critically, accountability.

Without swift action from local agencies, foreign governments, financial institutions, and multilateral bodies, South Sudan risks becoming a breeding ground for the transnational racketeers and criminal networks that rely on corruption and violence to do business. To that end, The Sentry is making the following recommendations, the full text of which appear at the end of this report.

**The United States (US) Department of the Treasury should investigate and, if appropriate, sanction Myree and his network of companies, as well as his South Sudanese partners and other international facilitators.** This investigation has identified potential misconduct that, upon further investigation, may be consistent with sanctions designation criteria under Executive Order 13818 (Global Magnitsky), including direct payments into a senior government official's bank account. Despite Myree's suspected involvement in



counterfeiting, intellectual property theft, and terrorist financing, companies under his control have benefited from lucrative government contracts in South Sudan.

**The US should engage South Sudan to take steps toward corporate transparency and accountability.** The US should continue its engagement with South Sudan to build strong corporate transparency, oversight, and accountability mechanisms, anchoring its strategy on South Sudan's progress advancing key provisions of the Revitalized Agreement of 2018, which seeks to realize a permanent and sustainable peace. High-level diplomacy, financial tools of pressure, and anti-money laundering measures can, if deployed strategically, pressure parties to the peace agreement to make measurable progress in the implementation of transparency and accountability mechanisms.

**Banks should strengthen anti-money laundering and countering the financing of terrorism (AML/CFT) frameworks at regional financial institutions, particularly those with correspondent banking relationships.** US, United Kingdom (UK), and European Union (EU) banks that maintain correspondent banking relationships with financial institutions in South Sudan and its neighboring countries should encourage respondent partners to strengthen their AML/CFT frameworks. Regional financial institutions should adopt enhanced customer due diligence and transaction monitoring, focusing particularly on transactions related to public procurement in South Sudan.

**The government of South Sudan should enforce its AML/CFT laws.** The government of South Sudan should take steps to operationalize its AML/CFT statutes, investigate the influence of PEPs in the banking sector, and implement strong customer due diligence, know your customer, and suspicious activity reporting requirements to mitigate the threat of future abuse. It should also take steps to improve transparency across the sector, empower oversight institutions, and establish an adequately funded, staffed, and trained Financial Intelligence Unit. In addition, it should increase spending on AML/CFT initiatives to ensure that stakeholders across government, civil society, and the private sector have the financial and technical resources necessary to implement robust AML/CFT guidelines.

## Unmasking Ali Khalil Merhi\*

In July 2020, Ali Khalil Myree received his certificate for consular representation, formally becoming South Sudan's honorary consul to Lebanon.<sup>1,2,3</sup>

Just days after Myree assumed his post, Lebanese newspaper Nida al-Watan published an article decrying the appointment, calling it an “example of diplomatic mismanagement” and claiming that the Lebanese Ministry of Foreign Affairs had initially rejected Myree’s application due to concerns about his personal history.<sup>4</sup> Shortly after, Juba-based Eye Radio wrote that the Lebanese national was allegedly a fugitive.<sup>5</sup> According to the article, he had fled Paraguay after being arrested for piracy.<sup>6</sup>

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\*Reports by The Sentry are based on interviews, documentary research, and, where relevant, financial forensic analysis. In some cases, sources speak to The Sentry on the condition that their names not be revealed, out of concern for their safety or other potential retaliatory action. The Sentry establishes the authoritativeness and credibility of information derived from those interviews through independent sources, such as expert commentary, financial data, original documentation, and press reports. The Sentry endeavors to contact the persons and entities discussed in its reports and afford them an opportunity to comment and provide further information. Where responses are received, they are explicitly reflected in the report and incorporated into the analysis.



Myree's attorney, Ali Fayed Rahal, condemned the allegations in the media reports, claiming they had come from "an oppressor who wanted to steal his [Myree's] livelihoods."<sup>7</sup> Rahal, a member of the political bureau of the Amal Movement, a Lebanese political party and paramilitary group allied with Hezbollah,<sup>8,9</sup> added that Myree provided significant "effort and goodwill...to his African country" and protected the interests of South Sudan's Lebanese community.<sup>10</sup>

However, The Sentry can demonstrate—through an extensive body of corporate filings, legal records, photographs, public reports, and social media posts—not only that Ali Khalil Merhi and Ali Khalil Myree are the same person, but also that the new honorary consul continued to engage in questionable business engagements and financial transactions throughout his time in South Sudan. The Lebanese businessman has established a group of successful businesses in the world's youngest nation, often alongside family members or PEPs. And while case files in Paraguay are not publicly accessible, a Paraguayan litigator with whom The Sentry spoke explained that under Paraguayan law, a case remains open until the subject of an investigation returns to stand trial—regardless of how many years have passed.

According to processing documents filed with Paraguay's Tacumbu National Penitentiary, Merhi was born on August 27, 1968—the same birth date recorded on Myree's Lebanese and South Sudanese passports.<sup>11, 12, 13</sup> Public reports identify Merhi's birthplace as Machghara, a Lebanese mountain town,<sup>15, 16</sup> which matches the birthplace listed in Myree's Lebanese passport on file with South Sudan's Ministry of Justice.<sup>17</sup> Additionally, several of Myree's companies in South Sudan were established alongside other businessmen from Machghara, including one with the Merhi family name.<sup>18, 19, 20</sup>



Myree's passports bear several significant indications that the fugitive from Paraguay and the South Sudanese tycoon are in fact the same person. Photos: The Sentry.

More significantly, Merhi from Paraguay and Myree in South Sudan are linked through his wife, Lila Asaad Hijazi, whom he reportedly married after his arrest in Paraguay.<sup>21, 22</sup> On October 25, 2000, Agence France-Presse reported that "during his detention at Tacumbu Prison in Asuncion, Mr. Merhi had married Hijazi, the daughter of a prominent businessman, in accordance with Islamic law. He then invited the 1,700 inmates of the prison to a feast."<sup>23, 24, 25</sup>



Corporate filings and social media posts reveal that Hijazi has remained in Myree's orbit in the decades since his departure from Paraguay, appearing alongside him as a shareholder or director of six companies in South Sudan, Lebanon, and Uganda, including Skyline Contracting, an enterprise with major interests in South Sudan.<sup>26, 27, 28, 29, 30</sup> Myree and Hijazi are also connected on Facebook, and their networks significantly overlap, particularly among members of the Merhi family from Machghara.<sup>31, 32</sup> They have appeared together in photographs of family reunions and vacations,<sup>33</sup> and on several occasions Hijazi has used terms of endearment when commenting on photos of Myree.<sup>34</sup> Shortly after Myree's confirmation as honorary consul, Hijazi shared a posting seeking an administrative assistant to work at the South Sudanese consulate in Beirut.<sup>35</sup>

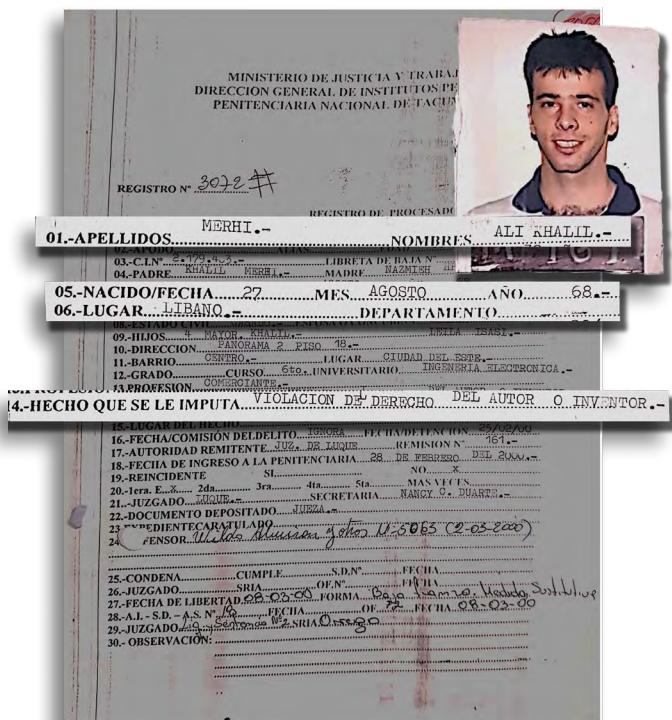
## The “Megapirate” of Paraguay

When Ali Khalil Myree was tapped for the position of South Sudan's honorary consul in Beirut in late 2019, it was not the first time his name had been floated for a diplomatic post. More than two decades prior and over 6,000 miles away, a Paraguayan congressman had lobbied for Ali Khalil Merhi to be the country's consul to Lebanon.<sup>36</sup>

At the time, Merhi was living in Ciudad del Este, a city of 227,000 people located on Paraguay's border with Brazil and Argentina,<sup>37</sup> a region known as the Tri-Border Area (TBA). Though the country's decades-long dictatorship under Alfredo Stroessner had ended, corruption remained a major challenge,<sup>38, 39, 40</sup> and this was particularly true in Ciudad del Este, where Merhi had opened his own office.<sup>41</sup> By the 1990s, the TBA had earned a reputation as a harbor for numerous criminal networks.<sup>42, 43</sup>

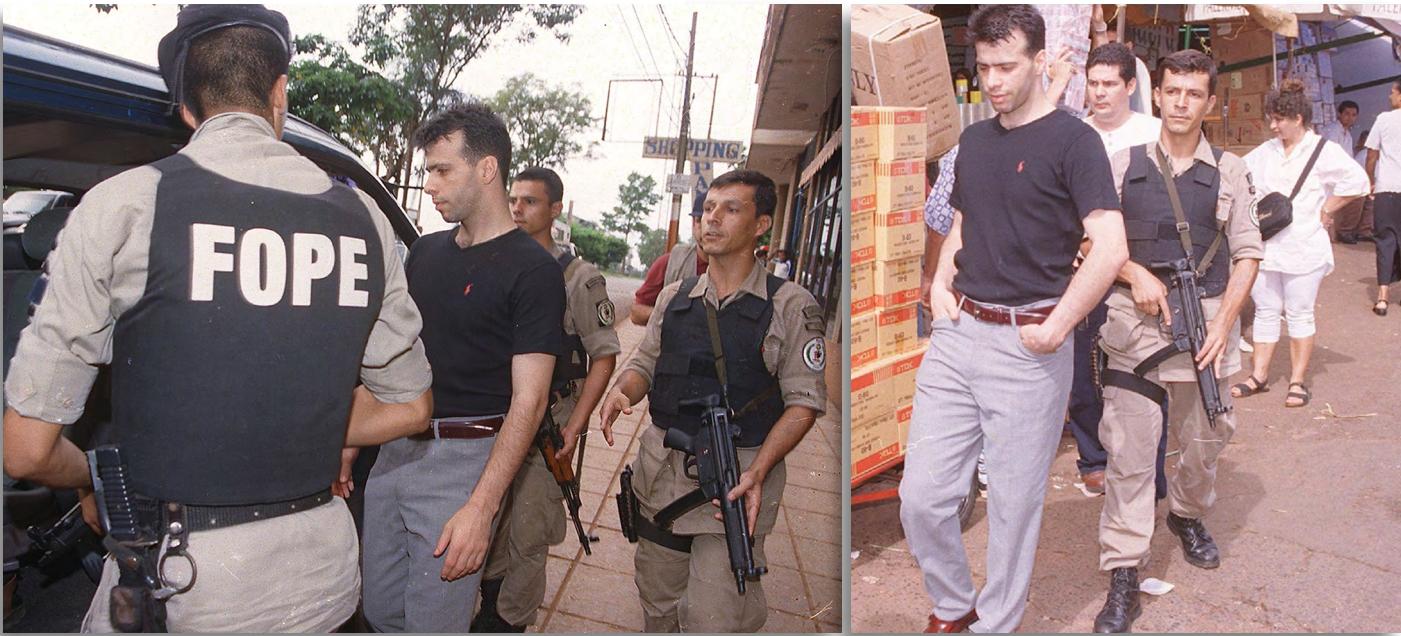
Merhi seemed to thrive in what the Los Angeles Times called “a global village of outlaws,” allegedly cementing himself in one of the region's chief illicit industries: piracy.<sup>44, 45</sup> Even in a competitive market, Merhi gained a reputation as a “mega-pirate,” reportedly becoming one of the most prominent distributors of counterfeit entertainment products in the TBA in the late 1990s.<sup>46, 47, 48</sup>

But Merhi's businesses ground to a halt the morning of February 25, 2000, when Asunción's Anti-Terrorist Division, in coordination with the Paraguayan National Police's Special Operation Force, mounted a raid of his home.<sup>49, 50, 51</sup> Reportedly placing explosives to blow in Merhi's apartment door in the Panorama 2 Building, Paraguayan authorities took both Merhi and his girlfriend into custody on suspicion of copyright violation.<sup>52</sup> Three days later, Merhi was remanded to Paraguay's Tacumbu Penitentiary.<sup>53, 54, 55</sup>



Documents obtained by The Sentry indicate that Merhi was remanded to the notorious Tacumbu Penitentiary shortly after his arrest in February 2000. Photo: The Sentry.





Merhi being escorted by members of Paraguay's Special Police Operations Forces at the time of his arrest in February 2000. Photos: Diario ABC Color from Paraguay.

When authorities searched Merhi's offices in the Galeria Page—a shopping complex long considered by the US Treasury Department to be a haven for Hezbollah-linked businesses—they discovered 80 machines capable of producing 20,000 CDs per day, as well as pirated CDs, PlayStation games, Nintendo cassette software, and logos and packing for several technology companies.<sup>57, 58, 59, 60</sup> The search also uncovered something more troubling: CDs containing videos of suicide bombers before their deaths; fundraising forms for Al-Shahid, a Hezbollah-backed branch that supports families of deceased operatives; and a bank account number where funds could be sent to Hezbollah's militant branch, Al-Muqawama ("the Resistance").<sup>61, 62, 63</sup>

Once Merhi was in custody, his suspected ties to Hezbollah gained attention in Paraguay and neighboring countries. Just after his arrest, his brother Mustafa Khalil Merhi was arrested in Argentina in connection with the 1994 Argentine Jewish Mutual Aid Association (AMIA) bombing.<sup>64, 65, 66</sup> Shortly thereafter, the Argentinian government filed two requests to interrogate Ali Khalil Merhi in connection with the AMIA bombing.<sup>67</sup> The Paraguayan courts fulfilled neither request, however.<sup>68</sup>

The judge hearing Merhi's case, Ruben Dario Frutos, released Merhi over prosecutors' objections of flight risk.<sup>69, 70, 71, 72</sup> By June 2000, the accused had reportedly left Paraguay for the Brazilian city of Foz de Iguazu.<sup>73, 74, 75</sup> By October, he had reportedly arrived in Lebanon, where local authorities refused to comply with extradition requests.<sup>76</sup> In a public statement, Merhi claimed he had fled for fear of being "assassinated" by police acting on behalf of the US Embassy and Sony, the multinational corporation.<sup>77</sup>

For its part, the press made a point of spotlighting Merhi's close links with senior government officials, particularly within the conservative ruling Colorado Party, to which he had once contributed significant funds.<sup>78, 79, 80</sup> His relationship with Angel Ramón Barchini, a Colorado Party member of Lebanese descent who had publicly defended several people suspected of links to extremist groups in the Middle East,<sup>81</sup> received particular attention.<sup>82, 83</sup> It was Barchini who, in 1997, had recommended that Merhi become Paraguay's consul general in Beirut;<sup>84</sup> the press also speculated that Barchini may have placed pressure on those investigating Merhi.<sup>85</sup>



## A Brief History of Ali Khalil Merhi

Twenty years ago, Lebanese businessman Ali Khalil Merhi was arrested in South America. Today, he is a South Sudanese tycoon.

1997

A Paraguayan congressman lobbies for Merhi to become the honorary consul of Paraguay in Lebanon.

2000

Merhi is arrested at his home in Paraguay and charged with copyright violation. Authorities also find evidence of possible links to terror financing. Merhi flees Paraguay before he can stand trial.

2007

A Lebanese businessman named Ali Khalil Myree incorporates his first two companies in South Sudan.

2009

Myree forms a mining company alongside President Salva Kiir's daughter.

Another of his companies, Skyline Contracting, becomes a registered vendor for the United Nations.

2012

Skyline Contracting deposits more than \$40,000 into General Malek Reuben Riak's personal bank account.

2013

Civil war breaks out in South Sudan.

Skyline deposits more than \$24,000 into General Reuben Riak's account.

2014

Myree opens the Crown Hotel, a luxury resort in Juba. Salva Kiir attends the grand opening.

2015

Myree obtains a South Sudanese passport.

Another company partly owned by Myree receives a mineral exploration license.

2019

Skyline Contracting unveils its newest project, the Ministry of Defence's headquarters.

Myree is appointed South Sudan's honorary consul in Lebanon.

He described Merhi as an "honest merchant" and said that he was the victim of persecution after the February 2000 raid.<sup>86</sup>

Following Merhi's flight from Paraguay, sources indicate that he restarted his piracy operations in Lebanon through "a satellite pirate facility he had opened several years earlier," according to a report from the RAND Corporation.<sup>87</sup> RAND reported that Merhi's operation, Skyline Software Systems, was located in the Ghobeiri neighborhood in Beirut, a Hezbollah stronghold.<sup>88</sup> Although the Lebanese corporate registry does not contain records for a company by the name of Skyline Software Systems, it does contain records for a company called Skyline CD SARL, which shares a business address and a phone number with known Merhi enterprise Skyline Contracting SAL Offshore.<sup>89, 90, 91, 92, 93</sup>

## Sanctuary and Success in South Sudan

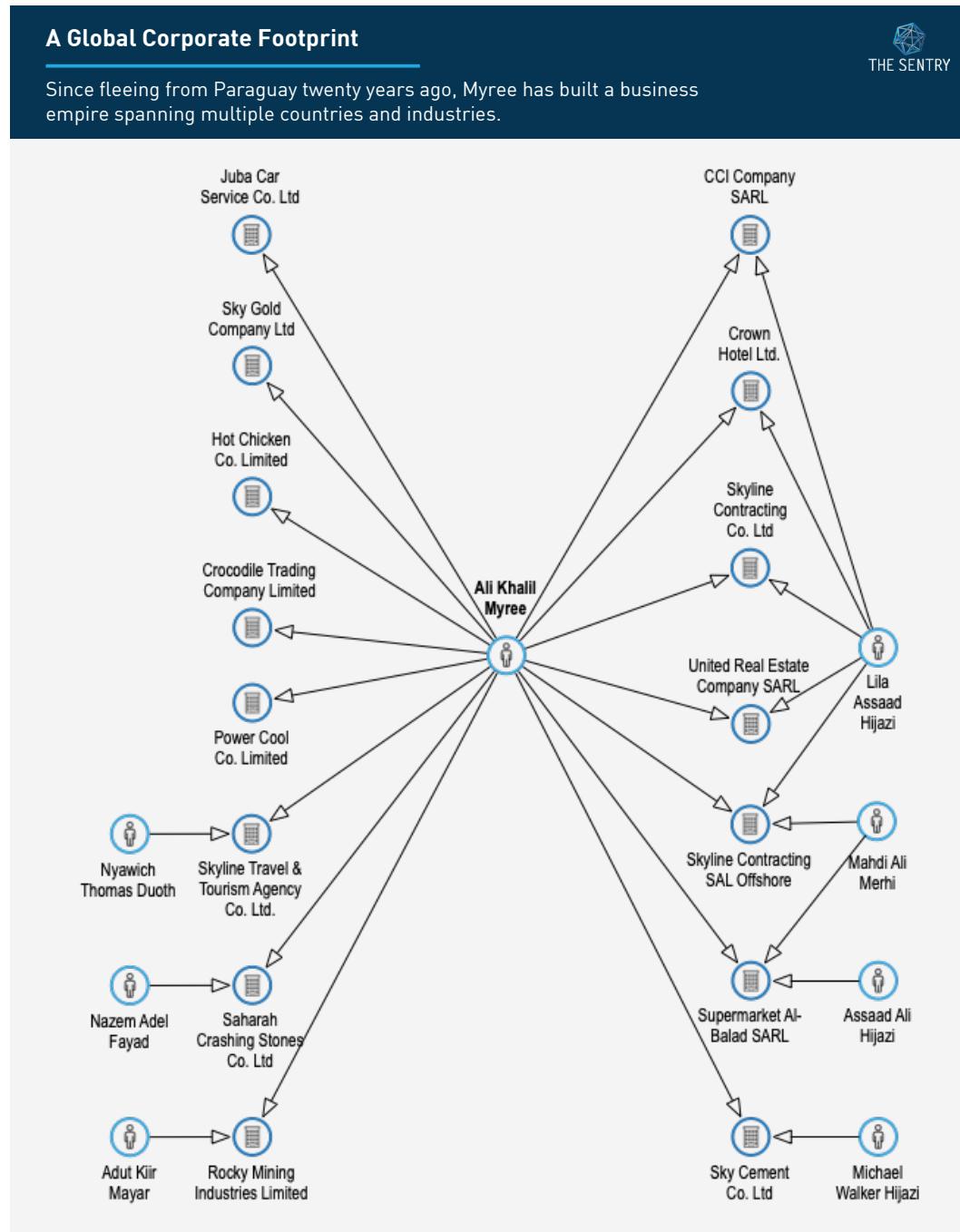
In 2007, as Paraguayan investigators searched for the fugitive Merhi, a Lebanese national named Ali Khalil Myree registered his first company in Southern Sudan, according to the national corporate registry.<sup>94</sup>

Despite the newly minted Myree's outstanding criminal complaint in Paraguay, he acquired the essential capital, bank accounts, and identity papers to begin establishing new companies. Shortly after arriving in Southern Sudan, he connected with his neighbor from Beirut, Nazem Adel Fayad.<sup>95</sup> A Sierra Leone-born Lebanese businessman, Fayad is alleged to have been involved in a counterfeiting scheme with his brother-in-law, diamond and arms trader Aziz Ibrahim Nassour, during the 1990s.<sup>96, 97, 98, 99</sup> In response to questions from The Sentry, Fayad stated that he had never done any business with Nassour. He confirmed, however, that Myree joined Saharah Crushing Stones Co. Ltd as a major shareholder in 2007. According to Fayad, their partnership ended after several months due to business disagreements.<sup>100, 101</sup>

In October 2007, Myree incorporated another Southern Sudanese company, Skyline Contracting Co. Ltd, with his wife, Lila Hijazi.<sup>102</sup> In 2009, Skyline became an approved vendor for the United Nations (UN), supplying \$2.23 million worth of cement, electrical wiring and cables, stone, and other construction materials to the UN Procurement Division (UNPD) over the next five years.<sup>103</sup>



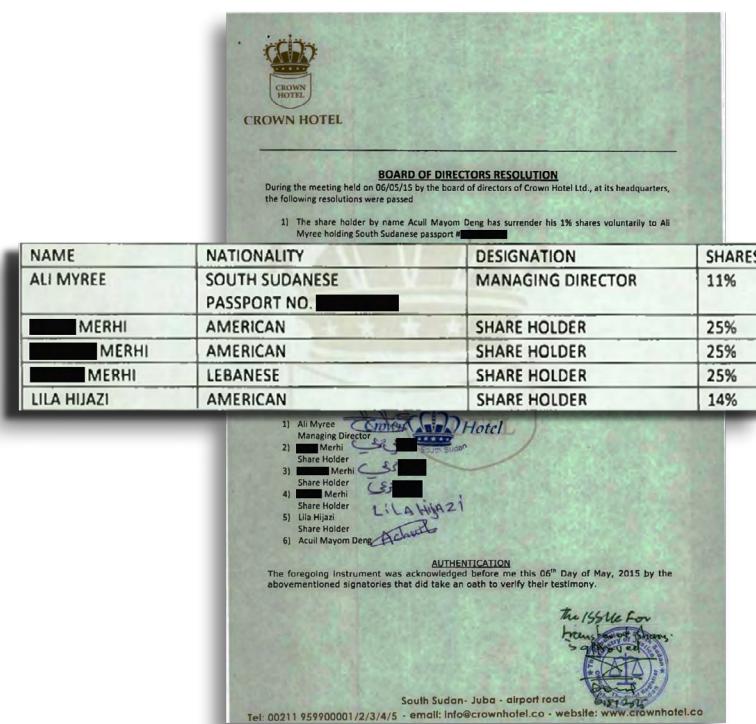
As Skyline began its initial projects, Myree's corporate footprint in South Sudan grew, often alongside associates from Machghara or relatives of senior South Sudanese officials. By 2013, he had registered no fewer than 10 companies in the young country, including Skyline Travel & Tourism Agency, a company jointly owned with Nyawich Thomas Duoth, the daughter of Thomas Duoth Guet, former director general of the General Intelligence Bureau.<sup>104, 105, 106</sup> In response to questions from The Sentry, Nyawich stated that Skyline Travel never became active, as civil war broke out shortly after she acquired shares in the company.<sup>107</sup> Myree also formed Rocky Mining Industries Limited alongside President Salva Kiir's daughter, Adut Kiir Mayar.<sup>108</sup> In response to inquiries from The Sentry in 2019, Myree said that Rocky Mining never became operation-



al.<sup>109</sup> Nevertheless, the formation of several businesses in association with PEPs, particularly in the natural resources sector, reflects a broader concern that a select few stand to gain from South Sudan's kleptocratic status quo.

In July 2012, Skyline Contracting began depositing rounded cash transactions into the personal bank account of General Malek Reuben Riak.<sup>110</sup> Between 2012 and 2014, Skyline paid \$88,676 into Riak's account.<sup>111</sup> In 2017 and 2018, respectively, the US Treasury Department and the UN Security Council placed Riak under sanctions for his role in expanding the conflict in South Sudan, particularly for procuring weapons for the Sudan People's Liberation Army (SPLA) and planning the 2015 offensive in Unity State.<sup>112, 113</sup> Following the UN Security Council's lead, the EU similarly designated Riak in August 2018.<sup>114</sup> According to the EU, the Unity State offensive resulted in widespread destruction, including the forced displacement of the local population, the indiscriminate killing and torture of civilians, and the widespread use of sexual violence.<sup>115</sup>

In May 2014, Myree completed construction on his flagship enterprise in South Sudan: the 120-room Crown Hotel, which received South Sudan's "Hotel of the Year" award.<sup>116, 117, 118</sup> Although the country had plunged into civil war in December 2013, Salva Kiir personally opened the hotel.<sup>119, 120</sup> Named by the Financial Times as "the capital's best spot if you want to bump into 'all the president's men,' top bankers, and the city's dealmakers,"<sup>121</sup> the hotel has hosted high-profile government ministers, business executives, and even a Fédération Internationale de Football Association (FIFA) president.<sup>122, 123, 124</sup>



The Crown Hotel was registered as Nour Residential Hotel on April 4, 2012.<sup>144</sup> A resolution dated May 6, 2015, identified Myree, Hijazi, and several other members of the Merhi family as the company's shareholders.<sup>145</sup> Photo: The Sentry.

Senior South Sudanese officials have racked up exorbitant bills while living full time at the Crown Hotel. In 2018, then-petroleum minister Ezekiel Lol Gatkuoth accumulated around \$680,000 in hotel fees during a long-term stay, paid for by multinational oil consortium Dar Petroleum Operating Company.<sup>125</sup> Members of South Sudan's National Pre-Transitional Committee stayed there in 2019.<sup>126</sup>

Since the Crown Hotel opened, Myree's companies have received lucrative government contracts and licenses for natural resources. His mining firm, Sky Gold Company Ltd., received a license to explore for gold in Central Equatoria on August 18, 2015.<sup>127</sup> On May 23, 2019, General James Hoth Mai unveiled a Skyline Construction project, the Ministry of Defense's new headquarters, also known as Eagle House.<sup>128</sup> An imposing, six-story structure, the building has reportedly been outfitted with state-of-the-art surveillance cameras and bulletproof glass. It cost the government of South Sudan more than \$40 million.<sup>129</sup>

Meanwhile, numerous members of the Merhi family have been listed as shareholders of Myree's businesses in South Sudan and Lebanon, and they have visited the luxurious Crown Hotel or made their home in South



Sudan.<sup>130, 131, 132, 133</sup> For example, Mahdi Merhi, who lists his residence as Juba on social media and who has studied tourism and hotel management, has been photographed alongside Myree at numerous business functions and with Myree's son from Paraguay, Khalil Merhi Sosa Otto.<sup>134</sup> Another son, Mostafa Merhi, attended the Eagle House's grand opening in 2019.<sup>135</sup>



Since his arrival in South Sudan, Myree has enjoyed an explosive rise to prominence, receiving major contracts and construction projects from the government and international bodies. This photograph from May 2019 was taken at the inauguration of the new Ministry of Defense headquarters. President Salva Kiir, Ali Khalil Myree, and Lila Hijazi can all be seen on the dais. Photo: South Sudan Consulate.

### United Real Estate Company SAL

In November 2016, Merhi and several of his relatives acquired a controlling share in United Real Estate Company SAL, a Lebanon-incorporated real estate enterprise originally owned by Ayoub-Farid Michel Saab and Fadi Michel Saab.<sup>136</sup> Just five months prior to the acquisition, the US Department of the Treasury's Financial Crimes Enforcement Network (FinCEN) had designated the Saab brothers' bank, FBME Bank Ltd., as a financial institution of primary money laundering concern.<sup>137</sup>

According to that notice, FBME had completed a significant number of transactions linked to illicit activity, including depositing "hundreds of thousands of dollars from a financier for Lebanese Hezbollah," providing "financial services to a financial advisor for a major transnational organized crime figure," and facilitating US sanctions evasion for "a U.S.-sanctioned Syrian entity, the Scientific Studies and Research Center (SSRC)."<sup>138</sup> The US Treasury Department designated SSRC employees in 2017 for the agency's role in Syria's chemical weapons program.<sup>139</sup> More recently, the Organized Crime and Corruption Reporting Project linked FBME to the owner of the Rhosus, the ship whose explosive cargo triggered a devastating explosion in Beirut in August 2020.<sup>140</sup>

Allegations of past misconduct notwithstanding, Myree has continued to appear publicly, including in his capacity as honorary consul. In October 2020, he traveled to an internally displaced persons camp in Mangalla, South Sudan, where he delivered food aid.<sup>141</sup> In December 2020, when the Honorary Consulate of the Republic of South Sudan opened in Beirut, Myree attended the festivities alongside Mayen Dut Wol, under-secretary of South Sudan's Ministry of Foreign Affairs, and Ambassador Victoria Aru, South Sudan's director of visas and passports.<sup>142, 143</sup> The Sentry tried multiple times but was unable to reach Myree for comment.





Neither a raging pandemic nor allegations of criminal misconduct have prevented Myree from advancing projects as South Sudan's new honorary consul to Lebanon. In December 2020, he and his family attended the opening of the new consulate in Beirut. Photos: Facebook.

## Disrupting Kleptocracy, Improving Security

The example of Ali Khalil Myree shows why addressing state capture is more than a humanitarian concern—it is an international security imperative.

Myree has for decades conducted business in places where the rule of law is weak, thriving where oversight institutions have been gutted by kleptocratic regimes. Neither his past as a fugitive nor his suspected links to potential terrorist financing have prevented him from continuing his international business activities and personal travels. In South Sudan, he has enjoyed access to bank accounts, travel documents, and multi-million-dollar contracts, all while maintaining close relationships with influential politicians and high-ranking military officials. Operating within the country's kleptocratic status quo, he has landed major deals without disclosing information vital to the public interest.

High levels of corruption and weak systems of governance like those in South Sudan not only enable repression and violence but also drastically increase a jurisdiction's appeal to organized criminal networks, including mafia-type organizations and terrorist groups. Feeble law enforcement organizations and inadequate customs controls further embolden bad actors engaged in illicit enterprises from terrorism to drug and weapons trafficking.

Governments, law enforcement agencies, and financial institutions have numerous tools at their disposal to insulate South Sudan's banking sector from future abuse, empower its oversight institutions, and enhance transparency. Most significantly, they can investigate and, if appropriate, impose meaningful consequences on those involved in misconduct. Nothing less than a coordinated effort to promote the rule of law, strengthen democratic institutions, and demand accountability can stem the tide of abuse. The following recommendations, if implemented, would advance these priorities and build accountability for wrongdoing.



## United States

**Investigate and, if appropriate, sanction Myree and his network of companies, as well as his South Sudanese partners and other international facilitators.** This investigation has identified misconduct that may be consistent with sanctions designation criteria under Executive Order 13818 (Global Magnitsky), including direct payments into a senior government official's bank account. Despite Myree's alleged involvement in counterfeiting and copyright violations and his suspected links to terrorist financing, companies under his control have benefited from lucrative government contracts in South Sudan. The US Treasury Department should investigate Ali Khalil Myree's activities in South Sudan and, if appropriate, designate him alongside key individuals and entities in his network.

**Engage South Sudan to take steps toward corporate transparency and accountability.** The US should continue its engagement with South Sudan to build strong corporate transparency, oversight, and accountability mechanisms. The US should anchor its strategy on South Sudan's progress advancing key provisions of the Revitalized Agreement of 2018, particularly those that address the management of national revenues and the integrity of oversight institutions such as the Anti-Corruption Commission and the National Audit Chamber. The US should also support and encourage South Sudan to join the Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG), the Financial Action Task Force (FATF)-style regional body focused on members' implementation of global AML/CFT standards. High-level diplomacy, financial tools of pressure, and anti-money laundering measures can, if deployed strategically, pressure parties to the peace agreement to make measurable progress in the implementation of transparency and accountability mechanisms. Without these mechanisms, and with abundant opportunities to steal with impunity, peace will remain tenuous.

## United Nations

**Review Skyline Contracting Company Limited and, if appropriate, remove it from the UNPD's list of approved vendors.** This investigation's finding that Skyline Contracting fulfilled a series of questionable transactions with a now-sanctioned general raises concerns about the company's adherence to the UN Supplier Code of Conduct and Pre-Requisites for Eligibility. To ensure that companies engaged in corruption, bribery, or other illicit activities do not benefit from UN funds, the UNPD's Vendor Review Committee should review Skyline Contracting Company Limited to assess its adherence to the UN Supplier Code of Conduct and Pre-Requisites for Eligibility.

## Financial Institutions

**Conduct enhanced due diligence, ongoing monitoring, and transaction reviews for Myree's holdings.** Myree's vast corporate footprint, history of alleged misconduct, and close business relationships with senior South Sudanese officials, as well as suspected terrorist financiers, illustrate the need for enhanced due diligence and additional monitoring of his and his network's activities. Financial institutions should conduct enhanced due diligence and transaction reviews of accounts held by Myree's network, including known associates and family members who have been listed as shareholders or directors in his businesses. Additionally, financial institutions and regulators should probe the Myree network's holdings for any potential suspicious transactions and evidence of possible support for terrorist organizations.



**Strengthen AML/CFT frameworks at regional financial institutions, particularly those with correspondent banking relationships.** Correspondent banking relationships provide vital services, but they also come with money laundering and terrorist financing risks. US, UK, and EU banks that maintain correspondent banking relationships with financial institutions in South Sudan and its neighboring countries, especially Kenya, should encourage respondent partners to strengthen their AML/CFT frameworks. In addition, regional financial institutions—particularly those that may be processing transactions for Myree or companies under his family's control—should adopt enhanced customer due diligence and transaction monitoring, focusing particularly on transactions related to public procurement in South Sudan.

### Government of South Sudan

**Enforce South Sudan's AML/CFT laws.** South Sudan's existing AML/CFT legal framework is plagued by a lack of implementation and a dearth of accountability mechanisms, opening the door to misconduct. To shield its financial system from future abuse, the government of South Sudan should take steps to operationalize its AML/CFT statutes; investigate the influence of PEPs in the banking sector; and implement strong customer due diligence, know your customer, and suspicious activity reporting requirements to mitigate the threat of future abuse. It should also take steps to improve transparency across the sector; empower oversight institutions; and establish an adequately funded, staffed, and trained Financial Intelligence Unit as provided by the Anti-Money Laundering and Counter Terrorism Act of 2012. In addition, it should increase spending on AML/CFT initiatives to ensure that stakeholders across government, civil society, and the private sector have the financial and technical resources necessary to implement robust AML/CFT guidelines and complete regular financial compliance and due diligence training.

**Commit to joining the Eastern and Southern Africa Anti-Money Laundering Group.** In order to insulate South Sudan's financial institutions from abuse by bad actors and demonstrate the government's commitment to cleaning up the country's banking sector, the government of South Sudan should commit and take steps to join the Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG). Such a move would enable South Sudan to benefit from external assessments of its AML/CFT frameworks and align its efforts with AML/CFT best practices.

**Create a FATF-adherent, publicly accessible online corporate registry.** An opaque modus operandi has enabled corruption and abuse by South Sudan's ruling clique and predatory international facilitators. To foster transparency, encourage legitimate investment in South Sudan, and prevent those engaged in questionable practices from conducting business without scrutiny, the government should publish an online corporate registry that discloses the ultimate beneficial owners of South Sudan-registered companies and adheres to guidance laid out in the 2012 FATF Recommendations. South Sudan's citizens have a right to know who ultimately benefits from lucrative deals and major government contracts. This move, if implemented, would ensure that information vital to the public interest is widely accessible, supporting anti-corruption advocates and empowering public oversight initiatives, particularly of banks and companies benefiting from public procurement.

**Operationalize the Public Procurement Act's mechanisms on due diligence and transparency.** South Sudan's Public Procurement Act, signed in April 2019, delineates the ethical, legal, and financial criteria by which contractors must be assessed prior to being approved, and it provides for the disqualification of contractors who misrepresent or falsify their qualifications. South Sudan should operationalize its Public Procurement and Disposal of Assets Authority to ensure that these provisions are upheld, that it has es-



sential information regarding the ultimate beneficial owners of companies seeking public contracts, and that adequate due diligence is conducted on entities seeking public contracts in South Sudan. The Public Procurement and Disposal of Assets Authority should also create a public, regularly updated online portal that discloses the recipients of all public contracts in South Sudan. Such a move would thwart predatory investors, who thrive where rule of law is weak and impunity is rampant. It would also signal South Sudan's commitment to building a more transparent corporate landscape and encourage legitimate enterprises to consider doing business there.

**Enforce and enhance due diligence processes, particularly when assessing applications for citizenship.** Myree's past as a fugitive and suspected involvement in terror financing raise questions about his ability to receive South Sudanese citizenship and, consequently, access to a South Sudanese passport. That he obtained both raises concerns that existing due diligence processes have proven inadequate safeguards against potential national security threats. South Sudan's Directory of Nationality, Passports, and Immigration should enforce existing due diligence processes and, in coordination with the National Security Service, enhance those processes when screening applications for citizenship, travel documents, and diplomatic titles.

**Support a well-functioning, independent, and impartial judiciary.** Corrupt practices such as political interference, intimidation, and blackmail undermine the integrity of legal institutions, cultivating a landscape of impunity highly attractive to criminal networks. South Sudan's courts lack the necessary resources and independence to conduct impartial investigations into criminal misconduct. To that end, the government of South Sudan should take steps to support the judiciary, particularly by enforcing Article 125 of the Transitional Constitution and by creating an independent office of the Director of Public Prosecutions.



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