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EXTREMIST CHARITIES AND TERRORIST FUND-RAISING IN INDONESIA

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CONTENTS

I. INTRODUCTION

Violent extremist organisations in Indonesia have long relied on charities and humanitarian appeals to cover some of their operational costs and occasionally subsidise violent operations. The Indonesian government was slow to recognise the harmful role these charities played in both terrorist financing and in maintaining the solidarity of extremist networks. It has made major progress since 2013 with the adoption of a comprehensive anti-terrorist financing law in identifying and prosecuting offenders. But police have mostly found out about their financing roles through interrogations of other arrested on terrorism charges – not from proactive investigation of extremist-linked charities. More needs to be done to equip the National Zakat Agency (BAZNAS), the Center for Reporting and Analysis of Financial Transactions (PPATK), and the Ministry of Finance to undertake audits of charitable organisations suspected of terrorist links.

In this report, the term "charities" covers non-profit foundations (*yayasan*) formally registered with the Ministry of Law and Human Rights; organisations set up to collect alms (zakat) and registered with (BAZNAS); and informal groups with no legal identity that make online appeals for donations in the name of a humanitarian cause with a bank account number.

This report examines three kinds of violent extremist organisations that have used charities to raise funds for operational expenses and jihad. The first was KOMPAK, a charity that became known for arming and supplying Muslim fighters in Ambon and Poso, the two areas where communal conflict broke out in the aftermath of a major political and economic crisis in 1998 that led to then President Soeharto's resignation. The model that KOMPAK established to collect funds from the general public for religiously charged humanitarian assistance has been replicated by other extremist organizations.

The second and the most formidable was Jemaah Islamiyah (JI) that had many foundations, both educational and humanitarian. The latter included the Hilal Ahmar Society of Indonesia (HASI) whose head, Dr. Sunardi, was shot and killed by Indonesia's counter-terrorism police unit, Detachment 88, during an arrest operation on 9 March 2022.[1] JI also made a small fortune from donation collection boxes (*kotak amal*) placed in minimarts across the country. The notable feature about JI charities is that they were designed not just to raise funds for short-term needs but to build a mass base. The funds raised through public and private donations were used to send selected members for combat training in Syria between 2012 and 2018 and to strengthen its social networks.

The third kind of charity consists of the many pro-ISIS groups that used funds through humanitarian appeals. Pro-ISIS charities most frequently aid the families of imprisoned or killed ISIS supporters, but also to maintain ideological conformity, by denying support to those who cooperated with Indonesian authorities. In some cases, they funded jihad operations.

Indonesian law enforcement measures against extremist charities have been linked to its efforts to meet the international standards on combatting terrorist financing and money laundering set by an intergovernmental body called the Financial Action Task Force (FATF). Indonesia was blacklisted by the FATF until 2005 when it made a few reforms that removed the stigma but was blacklisted

[1] "Kronologi Dokter Sunardi HASI ditembak mati Densus 88", CNN Indonesia, 11 March 2022.

again in 2012. It was finally removed from the list after enacting its first comprehensive law against terrorist financing in 2013 and putting a few other regulatory measures in place.

Despite these improved measures, Indonesia remains the only G-20 country that is not a full member of the FATF. Since it is hosting the G-20's 17th Heads of State and Government Summit in Bali in November 2022, the government is making a concerted effort to earn that membership by improving its enforcement record. The FATF standards, however, are tied to the process for freezing the assets of individuals and organisations designated as terrorists on a U.N. list that is deeply flawed. The report explores some of the complexities Indonesia faces in trying to respond both to very local dynamics as well as to international priorities.

Indonesia continues to face many obstacles in curbing extremist charities but 2022 could be a particularly opportune time to try new measures. Thanks to declining ISIS influence, massive arrests, and improved government efforts at disengagement, extremist groups are weaker now than they have been in many years. The confluence of these factors could mean that a government effort to experiment with several measures designed to curb extremist charities could bear fruit.

II. THE KOMPAK MODEL

The idea of creating charities to raise funds for jihad and other purposes was pioneered in Indonesia by an organisation called KOMPAK, an acronym for Komite Penanggulangan Krisis (Committee to Manage the Crisis). KOMPAK was set up by conservative Muslims in August 1998 to address the impact of the 1997-98 Asian economic crisis.[2] The model that KOMPAK established and that most extremist charities followed thereafter was to identify a concrete humanitarian need; give it a religious justification; raise funds as broadly as possible; claim full transparency by periodically publishing accounts and showing concrete achievements; and then use some of the funds for jihad and operational support. Personnel from KOMPAK became instrumental in disseminating this model to other extremist organisations.

A. The Founding of KOMPAK

It is important to remember the context in which KOMPAK was established in August 1998. After 32 years of authoritarian rule, president Soeharto had resigned three months earlier amid political and economic turmoil. Challenges to authority at the local level were erupting across the country. Serious communal tensions were moving toward open conflict between Christians and Muslims in Poso, central Sulawesi. In January 1999, Christian-Muslim clashes broke out in Ambon, Maluku, triggering a conflict that lasted years and caused some 6,000 deaths with tens of thousands displaced. Soeharto's successor, B.J. Habibie, embarked on a series of reforms, lifting restrictions on civil liberties and releasing political prisoners. Taking advantage of the new political openness,

[2] This was later expanded to Action Committee to Manage Crises, Komite Aksi Penanggulangan Krisis, with the same acronym, KOMPAK.

leaders of Jemaah Islamiyah, an extremist splinter of the old Darul Islam, returned from years of exile in Malaysia, convinced that Islamic revolution was at hand.[3]

KOMPAK was founded in the midst of this tumultuous time by the Indonesian Islamic Propagation Council (Dewan Dakwah Islamiyah Indonesia, DDII), an organisation with close ties to Saudi Arabia. It was also close to the Saudi-based Muslim World League (Rabitat al-'Alam al-Islami), which had funded training of Indonesian fighters in Afghanistan.[4] DDII was known both for its efforts to make Indonesian Muslims more strictly observant and for its "paranoia" about Christian missionary work in Indonesia.[5] These elements stand out clearly in the KOMPAK report of its first year and a half, covering August 1998 to December 1999.

The report stated that Soeharto, throughout his years in power, had favoured Christian and ethnic Chinese minorities at the expense of Muslims, especially Muslim entrepreneurs. It cited statistics on the dramatic slide of Indonesian Muslims into poverty as a result of the 1997-98 crisis and the resulting rise in crime and immorality. Worse, the crisis had led to a steep decline in the percentage of Muslims in Indonesia as offers of food, medical care and schooling from Christians led desperate Muslims to convert. Poverty had become a gateway to apostasy and therefore, humanitarian aid from Muslim sources was a way to defend the faith. In Islam, the report said, the rich have an obligation to share their wealth with the poor, and KOMPAK had set itself up as the organization that could act as both collector and distributor of charitable funds.

With the danger to the faith as a selling point, donations poured in from both home and abroad – aided by DDII's international connections. At the end of its first five months, in December 1998, KOMPAK had collected the rupiah equivalent of $29,223 from foreign donors and $142,638 from domestic ones. The following year, which was the first year of the Ambon conflict, the reported amounts rose to $66,241 from abroad and $193,703 collected locally.[6] The foreign donors included Muslim Aid from London; Angkatan Belia Islam Malaysia (ABIM); and the al-Haramain Foundation, headquartered in Saudi Arabia.[7]

B. The Move to Ambon

One of the original members of KOMPAK was a popular Saudi-trained cleric, Muzayyin Abdul Wahab, who served as imam of Nurul Hidayah mosque in Cipayung, Jakarta. After the fighting broke out in Ambon in early 1999, Muzayyin, through his KOMPAK connections, became a source of detailed information on the conflict, and many of his followers signed up to fight,

[3] Ali Imron, *Ali Imron, Sang Pengebom. Bali, 12 Oktober 2002: Kesadaran dan Penyesalan*, Republika Press, Jakarta, Indonesia, 2007.

[4] Martin van Bruinessen, "Genealogies of Islamic Radicalism". Southeast Asia Research, Vol.10. No.2, July 2002, pp.117-154. DDII and JI had a close relationship from the beginning, since Abdullah Sungkar, JI's founder, had been involved in DDII in the late 1970s.

[5] Ibid, p.121.

[6] The rupiah was undergoing major fluctuations during this period. The exchange rate to the dollar in December 1998 was USD1=IDR 5,915 and a year later it was USD1=IDR 7,900 with many rises and falls in between.

[7] Muslim Aid was a completely reputable organisation founded by the singer Yusuf Islam.The al-Haramain Foundation was a major Saudi charity with offices worldwide, including in Indonesia. Beginning in 2002, the U.N. and U.S. began designating certain country offices as organisations that supported terrorism. In January 2004, the Indonesia office was so designated based on testimony from captured al-Qaeda operative Omar al-Faruq that the foundation had supported al-Qaeda activities in Southeast Asia though the exact nature of that aid was unclear. In 2008, the entire organization was placed on the US Treasury and UN list of organisations financing terrorism.

including Abdullah Sunata, the man who became the commander of KOMPAK forces in Maluku. Muzayyin's younger brother, Arismunandar, was the head of the KOMPAK office in Solo. He was also head of the Islamic Centre there. A JI member and Afghan veteran (1991 batch), he also had his own links to the Middle East and managed to secure major funding for KOMPAK from Kuwait.

In the beginning, KOMPAK aid to Ambon was focused on food and other necessities. But because KOMPAK and JI were so close, when JI's military chief, Zulkarnaen (captured in 2020) sent Bali bomber Ali Imron to Ambon to open a military training site, Ali carried boxes of KOMPAK-funded food packets and travelled with KOMPAK volunteers. He says in his autobiography:

> The volunteers from KOMPAK were assigned to take care of the aid, but in the end, I directed them to take part in the combat training. They had to be ready to fight wherever they were needed. On my own initiative I used the aid from KOMPAK to buy guns, ammunition, and explosives.[8]

The training, which ended up being not in Ambon but on the neighbouring island of Buru, included men who became some of the best-known jihadists in Indonesia.[9] Both Arismunandar and Zulkarnaen were present, the latter as an instructor. The three-month course was financed by KOMPAK, through its support from the al-Haramain Foundation, but managed by JI. Tensions arose over fund-raising that were to plague the JI-KOMPAK relationship from then on. Zulkarnaen and Arismunandar in particular fell out, and KOMPAK set up a headquarters separate from JI under the leadership of Abdullah Sunata–who had no qualms about using humanitarian aid to support military training and combat needs.

KOMPAK also pioneered the practice of making videos of atrocities against Muslims in Ambon and later Poso to raise funds from Muslim sources at home and abroad, another tactic that subsequent extremist charities adopted. These videos, put on VCDs, were emotionally powerful, easy to copy and send, and kept donations coming in.

KOMPAK was at its height before any laws against terrorist financing or military training were in place, and its members were initially not involved in violence outside the conflict areas of Ambon and Poso. As a result, its top leaders mostly escaped arrest by Indonesian authorities. Arismunandar was never arrested, for example, even though he was instrumental in securing funds from Kuwait for military training and supplies for fighters in Ambon and he was placed on the U.S. Treasury list as a terrorist in September 2003.[10] Some KOMPAK members, who went to

[8] Ali Imron, op.cit.

[9] Among the participants on the KOMPAK side, in addition to Aris Munandar; were Salman alias Apud; Abdullah Sunata; Asep Jaya; Solahudin alias Miqdad or Chepi; Sulthon Qolbi alias Asadollah or Arsyad; Hari Kuncoro alias Uceng (Hari's brother-in-law, Dulmatin, was a JI member and one of the Bali bombers); Saifuddin alias Mohamed Yusuf Faiz, later known in Syria as Abu Walid (killed there in 2021); and his twin brother Nuruddin who died fighting in West Seram, Maluku shortly afterwards. JI members included Ali Imron; fellow Bali bombers Dulmatin and Abdul Ghoni alias Sawad; and Ali Hamka, who became a member of JAD and was arrested after the January 2016 attack in central Jakarta. Several Darul Islam members also took part.

[10] U.S. Department of the Treasury, "Testimony of Samuel W. Bodman, Deputy Secretary U.S. Department of the Treasury before the Senate Committee on Banking, Housing and Urban Affairs, press release js-1501, 29 April 2004. According to a KOMPAK member who was one of Aris Munandar's followers, Aris left KOMPAK and "went away" in 2002 but no one knew what had become of him. He may have gone somewhere else to lie low as police rounded up the Bali bombing team and their accomplices. See trial dossier of Joko Sumanto, South Jakarta district court, Decision No. 2615/Pid.B/2005/PN. Jkt Slt, 31 May 2006.

Mindanao for training and arms purchases were caught by either Philippine or Malaysian authorities. Even then, KOMPAK's top leader, Tamsil Linrung, was released by the Philippine without charge.[11] By and large, members were more likely to be arrested for joining forces with non-KOMPAK terrorists like Noordin Top than for KOMPAK-specific activities. This changed after a KOMPAK-led attack in 2005 on a police post guarding a Christian village in Loki, Seram, Maluku. The attackers, a joint KOMPAK-Darul Islam team, killed five paramilitary police and their cook, and the perpetrators got heavy sentences.

After Arismunandar became inactive in 2002, members increasingly looked to Abdullah Sunata, the KOMPAK commander in Ambon and Poso, as the man in charge. Whatever commitment KOMPAK originally had to transparency and accounting, it did not last once military needs became paramount. Donations received were still published in the KOMPAK news bulletin, *Warta Kompak,* later *Jurnal Kompak,* but there was no way of knowing whether additional funds were received that went unrecorded, nor was there any indication of how they were used. In 2004, for example, Sunata and Saifuddin alias Faiz alias Abu Walid received the equivalent of $25,000 in Saudi riyals from an Arab donor who had been Faiz's former classmate at Ummul Qura University in Mecca. Sunata reserved $5,000 for unknown purposes and gave $21,000 to Faiz to take to Mindanao to buy arms.[12] Less than a month later, however, Faiz was arrested on arrival in Zamboanga, and the mission failed.

Donors did not seem to mind that funds were raised for one thing and used for another, as long as their donations served the general interests of the Muslim community. This was true for both foreign and domestic donors. One of the latter was a building supplies dealer in Solo, Joko Sumanto, who had once been a business partner of Arismunandar and later became a senior executive in KOMPAK-Solo. He apparently had also been responsible for collecting zakat for KOMPAK, and in 2004, when Sunata said the fighters needed money to buy guns in the Philippines, Joko said zakat funds could be used for this purpose.

KOMPAK's success in merging fund-raising in the name of conflict victims and fighting the enemy–mostly Christians–became a model for other actors, such as the DI splinter known as Ring Banten, which worked closely with KOMPAK in Poso. In 2002, Ring Banten used Bulan Sabit Merah (Red Crescent) as its humanitarian arm for collecting funds to support fighters in Poso.[13] KOMPAK's fund-raising for humanitarian causes and its pledge of public accounting, at least in the beginning, may have been a model for the Islamist organisation MER-C (Medical Emergency Rescue Committee), which sent its first team of medical volunteers to Ambon in April 1999. The

[11] Tamsil Linrung, overall head of KOMPAK nationwide; Agus Dwikarna, head of the KOMPAK office in Makassar and also head of a militia that fought in Poso called Laskar Jundullah; and a Thai businessman were arrested at Manila's international airport in May 2002.

[12] Less than a month later, Faiz was subsequently arrested in Zamboanga in the southern Philippines and detained without trial for the next nine years. When he was finally brought to trial in December 2013, he was acquitted on a technicality, deported in March 2014, and after marrying the widow of an extremist, he and his new wife left for Syria.

[13] Bulan Sabit had no connection to the International Red Cross and Red Crescent Societies.

difference was that MER-C was never involved in violence and its medical skills were genuine, though in its early years it also provided support to the families of convicted terrorists.[14]

C. Supporting Extremist Prisoners and Their Families

Under Sunata, KOMPAK also began the practice of raising funds in the name of supporting wives and families of extremist prisoners. In May 2004, Sunata went to Joko's house and asked him for a special contribution to support the wives of two prisoners with close ties to KOMPAK. He gave an initial donation of Rp.400,000 ($47), then agreed to monthly contributions of Rp.100,000 ($11.75) each for two women.[15] The amounts may have been small but aiding the families of those arrested or killed in police operations became a justification for seeking donations that was to become a standard ploy among extremist groups, especially as the number of prisoners steadily rose. In some cases, the collected funds reached the intended recipients but not always, and not always in the full amount promised. Even when prisoners were the beneficiaries, they were not the direct recipients of cash: In 2007, KOMPAK officials reportedly used funding to pay off the relevant officials to secure conditional release for five KOMPAK prisoners.[16]

KOMPAK as an organisation began to fade after the arrest of Sunata and his friends in 2005 for various acts of terrorism. They had hidden two of the Bali bombers, Umar Patek and Dulmatin, given arms to Noordin Top, sent KOMPAK cadres to Mindanao, and led the 2005 attack on the police post in Seram. They had also been involved in a foiled plot to kill liberal cleric Ulil Abshar Abdalla.

KOMPAK members, however, continued to be the creative vanguard of the violent extremist movement, including in fund-raising. In 2009, as some members began to be released from prison, they founded the charity called Infaq Dakwah Center (IDC), almost as an extension of the old KOMPAK. Leading figures were Salman alias Apud, a KOMPAK member who had just returned home after five years in a Malaysian prison, and his father, Haji Muhammad Dahlan, a wealthy DDII member.[17] One of Haji Dahlan's protégés, Mulyadi Abdul Ghani, became the head of IDC. Haji Dahlan became its major donor, and Apud became a founder of the website voa-islam.com, on which all IDC appeals appeared.

Some of IDC's activities were similar to those of the pre-Ambon KOMPAK: its volunteers delivered aid to poor areas of Bekasi, for example. But one of its main activities was continuing Sunata's program of support to extremist prisoners and their families. The need for such support grew after a terrorist training camp in Aceh was discovered by police in early 2010 and more than 100 people from several different organisations were arrested, including, for the second time, Sunata, who had helped recruit some trainees.

IDC was not the only organisation aiding prisoners' families. In 2009, a fund-raising appeal for the same purpose appeared on Facebook in the name of the "One Thousand a Day Movement"

[14] MER-C's founder and director, Joserizal Jurnalis, was the personal doctor to Abu Bakar Ba'asyir and maintained until his own death in 2020 that Ba'asyir was never involved in terrorism and shunned terrorist teachings, which was patently untrue.
[15] The exchange rate to US dollar in 2004 on average was USD1= IDR 8,500.
[16] Interview notes from KOMPAK member and former prisoner, 6 October 2007, made available to IPAC.
[17] Apud had been caught in 2003 by Malaysian authorities in Sabah, returning from military training in Mindanao.

(Gerakan Sehari Seribu, GASHIBU). One of its founders was Irham Fuadi alias Izzi Imani, a former activist affiliated with the non-violent conservative Islamic party, Partai Keadilan Sejahtera (PKS) in Bekasi, who became disenchanted with the party following what he saw as its political opportunism.[18] He began to attend religious study sessions at Bekasi mosques known for their radical preachers and decided to raise funds for jihadi prisoners among their sympathisers, using the PKS model for crowdfunding for Palestine.

GASHIBU's fundraising was different from IDC, as the organizers sought to raise funds among the non-jihadi public, such as Muslim businesspeople in Bekasi, on the recommendation of well-known figures such as Haji Dahlan and cleric Farid Okbah. Another difference was that GASHIBU was exclusively devoted to aiding prisoners and their families; there was no general assistance to the poor. After the 2010 arrests linked to the Aceh camp, IDC and GASHIBU became the most active organisations focused on prisoners, their families and the families of those killed in police operations. It later joined the pro-ISIS camp.

Overall, a dominant characteristic of KOMPAK and later ISIS fund-raising was its sense of responding to immediate needs, rather than serving long-term goals. KOMPAK used all funds raised to get food and other necessities to disaster and conflict victims (and later to prisoners and their families), guns and ammunition to fighters, and logistic support, including travel costs, to military instructors and recruits. Its training programs were aimed at emergency boosting of Muslim military capacity in Ambon and Poso. Its entire existence was predicated on rapid deployment to defend a beleaguered community. ISIS, as we will see, followed a similar pattern, though it mostly relied on those going to Syria to fund their own travel costs. There was no sense, with the possible exception of KOMPAK-South Sulawesi, of using funds raised through charitable appeals for broader strategic goals.[19]

III. JEMAAH ISLAMIYAH AND ITS CHARITIES

Jemaah Islamiyah (JI) was different. From its founding in January 1993, its leaders thought in terms of a 25-year time frame and beyond. Its ultimate goal was to establish an Islamic state in Indonesia that would eventually join a universal caliphate, and its programs in education, *dakwah* (religious outreach), and humanitarian aid were all aimed at building a mass base. Indeed, one of the reasons that many senior JI leaders in Indonesia disagreed with the 2002 Bali bombings and other al-Qaeda style tactics was that they believed this would undermine the effort to build

[18] Izzi Imani was assisted by two ex-prisoners, Abdul Azis dan Agung Setyadi, who took over the organisation after Izzi left for Syria to join ISIS in 2014.

[19] Agus Dwikarna, the head of KOMPAK for South Sulawesi, was also a founder of Laskar Jundullah, a Muslim militia in Poso and of the Committee to Prepare for the Application of Islamic Law (KPPSI), a non-violent group that aimed at formal application of Islamic law in South Sulawesi. Just as it was impossible to keep his various identities straight, it was difficult to tell whether fund raised in the name of KOMPAK were also going for the more long-term efforts of KPPSI and vice versa.

community support.[20] It was this long-term vision that led JI to survive and adapt as the local context changed.[21] The use of charities evolved accordingly.

A. JI Charities as Money-Making Machines

As noted in an earlier IPAC report, JI underwent a major transformation under Para Wijayanto, the man selected to lead the organisation, first as caretaker, then as full-fledged amir, after the 2007 arrest of then amir Zuhroni alias Zarkasih.[22] Under Para, JI became more centralised and more security conscious. It focused more on political strategy, moving decisively away from violence in Indonesia, at least in the short-term, while building up its membership and military capacity. Para assumed that sooner or later the political situation in Indonesia would change in JI's favour, and the organisation needed to be ready to exploit the opportunity. At that point, it would need political allies, popular support, and ability to use force. Until that moment, the focus would be on building up its base through *dakwah* and education as well as preparing selected cadres for combat by sending them abroad for training.

For all of this, the new JI needed to significantly increase its fund-raising and improve its financial management to pay for its ever-increasing operational expenses. Para, who was selected as *amir* in part because of his managerial skills, treated JI as a corporation with himself as CEO. The "company" set job descriptions and performance goals for heads of divisions and provided modest salaries, housing allowances and operational expenses for senior "employees".[23] Their short-term objective was to strengthen productive economic assets, increase member donations, and make more use of charitable appeals to raise funds.

JI tried to increase the membership through expanding its pesantren network, known as Forum Komunikasi Pondok Pesantren (FKPP), and introducing "integrated Islamic schools" designed to appeal to wealthier parents.[24] It also intensified recruiting on urban campuses. Membership

[20] Abu Rusydan, "Bukan Pengecut Tapi Siasat," *An-Najah*, May 2010 and "Abu Rusydan: Aksi Teror Bukan Tanggung Jawab JI", *Untold Story/ The X files*, 26 Jun 2007.

[21] Every time major shifts in internal or external dynamics took place, JI adjusted its structure or tactics and sometimes both. These shifts included Soeharto's fall and the political opening that followed; Ba'asyir's de facto departure from JI, first to MMI, then to JAT, then to ISIS; the outbreak of the Ambon-Poso conflicts in 1999-2000; the collapse of JI's structures outside Indonesia from 2001 to 2003; the first wave of arrests after the Bali bombs; the second wave of arrests after a clash in Poso in 2007; the short-lived alliance of extremists in Aceh in 2010 that JI refused to join (to the contempt and anger of fellow extremists); the opportunities offered by the outbreak of the Syrian conflict in 2011; and the mass mobilisation of above-ground Islamists against the Jakarta governor, Ahok in 2016.

[22] IPAC, "The Impact of the Taliban Victory on Jemaah Islamiyah," Report No.73, 7 September 2021.

[23] Budi Trikaryanto, head of JI intelligence, received a salary of Rp.3 million ($207) a month, a housing allowance of Rp.3 million ($207), a handphone, a motorcycle, and a holiday bonus of Rp.4 million ($275.8). He does not mention the date but he was arrested in July 2019 around the same time as Para Wijayanto, so these figures probably reflected his income from 2018 (USD1=IDR 14,500). See trial dossier of Budi Trikaryanto alias Budi alias Abu Aiman alias Haidar, East Jakarta district court, Decision No. 306/Pid.Sus/2020/PN Jkt Tim, 20 July 2020.

[24] JI's network of Islamic boarding schools (*pesantren*) served as a permanent institutional base that no other extremist organisation in Indonesia could claim. From JI's establishment in 1993, these schools were its main source of recruitment and one of its primary instruments for achieving its long-term vision. The foundations (*yayasan*) that ran the schools, numbering some 40 in 2022, were also an important mechanism for collecting and managing members' dues and overseeing contributions from local businesses. In addition to raising funds to support the operational expenses of the schools, beyond what tuition provided, they provided various forms of assistance to the community as well: collection of zakat, assistance to orphans, distribution of meat on Idul 'Adha, the Muslim feast

expansion, however, was a longer-term proposition, given the lengthy induction process and the fact that it would be some time before the new recruits became steady income-earners. Para's major effort at acquiring land on the island of Kangean, off the coast of East Java, turned into a fiasco, with the major donor, an ethnic Chinese convert to Islam, accusing the local Madurese project director of embezzlement and refusing any further donations.[25] Other potentially productive land, including in Sumatra, would not be a major source of funds anytime soon.

In the meantime, expenses continued to climb. Organisational meetings had to be funded, businesses started, prisoner families supported, fugitives hidden, and public events organised.[26] Training costs alone rose from Rp.60 million ($6,185) in 2012 to Rp.100 million ($8,064) in 2014, with funds going for trainers, equipment, housing rental, food, transport and pocket money for trainees–and that was not counting the expense of their eventual travel to Syria, upkeep there and return.[27] From 2012 onwards, JI divisions and branches were given financial targets by the *markaziyah* and in some cases came up short, although the targets were also set higher than anyone expected them to meet.[28] That left charities as a source of fast cash to meet an annual budget that by 2018 was running at USD$1.1 million.[29]

Each charity was set up as a fund-raising mechanism under a functional division and designated an "technical implementing unit", *(unit pelaksana teknis*, UPT) for JI. The UPTs were deliberately designed *not* to be underground organisations, although JI's connection to them remained hidden. The staff were often mixed, JI and non-JI, and their goal was to win sympathy among the general public so that they would contribute generously to the organisations' activities.[30] The most important UPTs were the Hilal Ahmar Society Indonesia (HASI), Syam Organizer (SO) and One Care under the *dakwah* division and Abdurrahman bin Auf Foundation (ABA) and Perisai Nusantara under the *tajhiz* division. In all, however, there were more than a dozen charities, all

of sacrifice, and much more. The idea of humanitarian aid to help the weak and vulnerable was not only in keeping with basic Islamic values, but it was also very much part of the strategy to build a mass base.

[25] Trial dossier of Para Wijayanto, East Jakarta district court, Decision No. 308/Pid.Sus/2020/PN Jkt Tim, 20 July 2020.

[26] When it became necessary to hide long-term Poso fugitive Upik Lawanga in Metro-Lampung, a relatively well-off poultry farmer there set him up in the duck-farming business with an outlay of Rp.3,500,000 ($241-$388); then renovated a house for him and built a duck pen (Rp.4,500,000 or $310 to $500). The JI branch in Metro contributed Rp.300,000 per month for the next 18 years. (The conversion rate fluctuates each year. The rate used in this calculation is based on the lowest and highest rate between 2009 and 2021. The lowest was rounded up to USD1=IDR 9,000; while the highest was rounded up to USD1=IDR14,500)

[27] Conversion rate from Indonesia Rupiah to US dollar in 2012 was USD1=IDR 9,700, while in 2014 was USD1=12,400

[28] Budi Trikaryannto gave what later turned out to be very misleading testimony about the finances of the *tajhiz* division, which in fact was very well off. For example, he said the division was given a target in 2012 (USD1=IDR 9,700) of Rp.80 million ($8,247) but came up with only Rp.35 million ($3,608); in 2013 (USD1=IDR 12,200) it had a target of Rp.100 million ($8,189) and came up with only half; and in 2014 (USD1=IDR 12,400), the target was Rp.150 million ($12,096) and the division managed to raise Rp. 80 million ($6,451). In fact, the funds they received from the foundations operating under tajhiz auspices were much greater. See trial dossier of Budi Trikaryanto, op.cit.

[29] IPAC, "The Impact of the Taliban Victory on Jemaah Islamiyah," Report No.73. 7 September 2021, p.12.

[30] Trial dossier of Fitria Senjaya, East Jakarta district court, No. 604/Pid.Sus/2021/PN Jkt.Tim, 1 December 2021.

designed to attract community support and raise funds for internal organisational needs while projecting an image of selfless fund-raising for humanitarian causes.[31]

B. Hilal Ahmar Society Indonesia (HASI)

After a somewhat murky beginning, HASI came to be what Para Wijayanto called "JI's vehicle for sending humanitarian volunteers to Syria."[32] It reportedly began as a group of doctors, pharmacists and other medical volunteers from different organizations who wanted to help in Aceh after the 2004 tsunami.[33] The main group represented then was MER-C. But JI saw the advantages of having its own humanitarian arm, first after the 2006 Yogyakarta earthquake, which took place within JI's Central Java stronghold, and even more after the Syrian conflict erupted. HASI began sending regular delegations to Syria in 2012. In one month alone, 4 November to 4 December 2012, it sent four teams to Syria, going through official channels (at this point, Turkey was still allowing humanitarian missions to cross the border).[34] All were a mixture of JI and non-JI personnel. A fifth team left in February 2013, headed by Bambang Soekirno, a successful JI publisher and once an active member of JI's Central Java *wakalah*, a subdivision of Mantiqi II. The seventh team was a combined HASI-Syam Organiser mission.

To the public, HASI reported that its activities included building the Salma field hospital in Latakia, providing medical assistance, distributing food and clothing, maintaining generators, and running a bread factory and a mobile medical clinic. JI's central command, however, knew that some of the aid was going to Syrian militias, and that some team members stayed to fight.

For JI, HASI had many uses. By attaching themselves to others with more experience in Syria, JI gained knowledge of routes and contacts, which it later turned to good use for its training program. It was a useful cover for military training with a variety of militias. And given the high level of interest at home in the Syrian conflict, it was possible to draw large audiences to *tabligh akbar*, or public meetings, to discuss Syria, sometimes featuring recently returned HASI delegates. Between HASI and Syam Organiser, JI held 60 *tabligh* over 2012 and 2013, raising up to Rp 103 million ($8,442 to $10,618) per meeting and often pandering to the strong anti-Shi'a feelings of the participants by focusing on the brutality of Bashar al-Assad, an Alawite.[35] The funds went to the *markaziyah* but they were credited to the *dakwah* division. HASI was forced to cease activities after 13 March 2015, when the UN declared HASI a terrorist organisation for its association with the al-Nusra front and JI. The Indonesian government froze its bank account in June 2015.

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[31] The other charities were Yayasan Madina, Yayasan Jalinan Keluarga Dakwah Indonesia, and Yayasan Griya Tabungan Akherat (GTA), all under the dakwah division; Yayasan Nazis Darus Sunnah and all the pesantren foundations under FKPP; Yayasans Adnaul Bayan, Salam Care and Amala Mulia, under the education division; and Aku Peduli under the ADIRA division.

[32] Trial dossier of Para Wijayanto, op.cit.

[33] Notes from 2014 interview with senior HASI official, made available to IPAC, 7 March 2022. At the time, the official strongly denied any link with JI. Given the untruth about the JI link, it is difficult to know how much credence to give the rest of the interview, but some of it rings true.

[34] "Tim Relawan Hilal Ahmar Society Indonesia Tiba di Suriah", an-Najah, 2 February 2013.

[35] Many conservative Muslim groups saw the Syrian conflict as a struggle by devout and persecuted Sunnis to oppose or bring down President Assad, an Alawite Shi'a. The anti-Shi'a rhetoric was particularly pronounced among Salafi groups that sent aid through charities such as Peduli Muslim, run by the at-Turots Foundation (known in the West as Society for the Revival of Islamic Heritage) and Misi Medis Suriah (Syrian Medical Mission) of al-Irsyad. See IPAC, "Indonesians and the Syrian Conflict", Report No. 6, 30 January 2014, pp. 5.

C. Syam Organiser (SO) and One Care

Syam Organizer had started out as JI's event organiser, but Syria was where the money was, so the name was changed accordingly. It was officially registered with the Ministry of Law and Human Rights as Yayasan Amal Syam Abadi. Just as HASI had attached itself to MER-C and then moved off on its own, SO attached itself to HASI to develop contacts in Syria before moving to become an independent organisation. Its main mission was to organise public rallies to collect funds for Syrian refugees and others affected by the war. Between 2013 and 2021, it raised Rp 124 billion (US$8,7 million) from both online and offline events such as tabligh akbar through 21 provincial branches.[36]

As with the other charities, the funds raised through SO were divided into those to be used for external activities—sometimes genuine humanitarian aid, sometimes military training or support for militias in Syria–and those to support JI's operational needs. At its height, in 2017, SO's headquarters in Yogyakarta had 70 paid employees and could raise up to Rp 1 billion (US$ 69,930) per month from its branches.[37] It turned over some Rp 150 million (US$ 10,500) per year to the central command; the amount of the levy changed according to the changes in the annual budget. SO was also responsible for handing over some of the funds raised to Jabhat al-Nusra, JI's main partner in Syria in the early years of the war. In December 2013, two SO staff and two combatants travelled to Syria and turned over $7,000 (Rp 100 million), then stayed on for military training.[38]

The SO staff went to great lengths to avoid suspicion, even though by 2017, it was clear they were under surveillance. The charity employed a mixture of professionals and JI members. It forbade male employees to have a long beard or wear pants above the ankle, the standard garb for conservative Muslim men. Women were allowed to work in the charity offices, another break with usual JI practice, and the public rallies partly shifted to door-to-door fund-raising as concern about police monitoring increased. As additional cover, JI hired celebrities to appear in SO advertisements.

To further divert attention from Syam Organiser, JI set up a new *yayasan*, One Care, also under the *dakwah* division. Just as Syam Organiser had attached itself to HASI to get started, One Care piggy-backed on SO. It was also successful in raising funds from the public, collecting Rp 7 billion (US$500,000) in 2017 and Rp 20 billion (US$ 1,4 million) in 2018.[39] As more and more JI members responsible for fund-raising were arrested, One Care was forced to deny publicly that it had any JI connection. In a statement issued in December 2020, it said that One Care was working actively to mitigate the social economic impact of the pandemic, and that it was independent and devoted solely to humanitarian work. It had nothing to do with terrorism or radicalism, and if it

[36] Andita Rahma, "Menabur Suriah Menuai Kencleng: Metamorfosis Penggalangan Dana Jamaah Islamiyah", interaktif.tempo.co, 2 September 2021. In April 2014, the Purwodadi branch in Central Java raised Rp 7 million (US$ 490) in the course of several discussions at the Jabalul Khoir Grand Mosque, and the branch head claimed the monthly intake was between Rp 6 million (US$ 419.5) and several dozen million. A single event in Pati, Central Java, raised Rp 20 million (US$ 1,398). All calculations used 2021 exchange rate of USD1=IDR 14,300.

[37] Raymundus Rikang, "Topeng Amal Pemburu Duit", *Majalah Tempo*, 27 November 2021.

[38] Direktorat Putusan Mahkamah Agung Republik Indonesia, "Verdict of May Yusral alias Umar alias Abu Hani alias Umar al-Faruq alias Haji alias May bin Tahardiman", Decision No. 395/Pid.Sus/2019/PN.Jkt Tim, p.39.

[39] One Care also involved in international humanitarian aid but JI officials deliberately not using the Syrian conflict issue to make it less suspicious. Andita Rahma, op.cit. We took an average conversion rate of USD1=IDR 14,000. The rate for one US dollar in 2017 and 2018 were IDR 13,548 and IDR 14,481, respectively.

happened that a volunteer had an affiliation with a certain institution, this had nothing to do with One Care. It was open to anyone, guarded its professionalism carefully and its financial records were open for anyone to inspect. It was fully committed to support for the government.[40] The problem for One Care was that too many of the JI prisoners arrested had already exposed the JI link. As of March 2022, social media accounts affiliated with One Care were either inactive or deactivated, although no law-enforcement action is known to have been taken against the organisation or its staff.

D. The Abdurrahman bin Auf Foundation (ABA)

By far, the most successful charity that JI established was the Abdurrahman bin Auf Foundation (ABA). JI initially set up the foundation in 2004 to provide financial assistance to prisoners and their families after mass arrests following the 2002 Bali bombings and the 2003 Marriott Hotel bombing in Jakarta. But in 2013, the foundation was transformed under Para Wijayanto to generate funds for JI's long-term planning. Para chose Fitria Senjaya, a long-time JI member who owned and managed an insurance company, PT Sico in Jakarta, as the director.[41]

Under Fitria, ABA developed a wide range of activities for external consumption. It had a dakwah program that sent preachers across the country and organised *tabligh akbar* on various topics. Its education program provided scholarships to pesantrens and other forms of educational assistance. It had a health program that provided free medicine and ambulance services, and it provided economic aid to widows, orphans and other vulnerable groups. It collected funds for Palestine, gave entrepreneurship training, helped "clone" JI businesses, and assisted victims of natural disasters.[42] Beginning in 2017, each of its 13 branch offices established a "rescue team" that it could deploy as needed.[43]

But that was only half the story. The real innovation was ABA's collection of occasional voluntary donations (infaq/sedekah) from the general public and the way it cooked the books to ensure that funds could be used for JI's internal needs. In 2017, ABA registered with Indonesia's National Zakat Agency (Badan Amil Zakat Nasional, BAZNAS) to bolster its credentials as a legitimate charity organization. It was already a legal entity, having earlier registered as a foundation with the Ministry of Law and Human Rights. Now, however, it used its BAZNAS affiliation to place donation collection boxes (*kotak amal*) in public places across the country.

Each ABA branch had responsibility for determining where the boxes would be placed, collecting the funds, and sending a portion of them on each month to the *tajhiz* central office in accordance with a pre-determined target. In 2014, ABA contributed Rp.50 million (US$ 3,759) to the *tajhiz* coffers. It tripled this to Rp.150 million (US$ 11,278) in 2015 and increased it to Rp.500 million (US$ 37,593) in 2016.[44] (There was no transfer of funds to the centre in 2017 and 2018 because of security concerns.) By this time, the charity had placed 13,000 boxes in minimarts, retail stores

[40] "Yayasan One Care Bantah Terlibat Danai Kelompok Teroris JI," news.detik.com, 19 December 2020.

[41] The insurance company's office was located in the same office building as ABA in Kebayoran, South Jakarta.

[42] Trial dossier of Fitria Senjaya, op.cit. and Ahmad Zaini alias Epson alias Akyas, East Jakarta district court, Decision No. 605/Pid.Sus/2021/PN Jkt Tim, 1 December 2021

[43] Those branches were located in Jakarta, Medan, Lampung, Yogyakarta, Semarang, Pati, Solo, Temanggung, Malang, Surabaya, Magetan. Lombok and Ambon. ABA had started out with six branches in 2004.

[44] We took an average exchange rate of USD1=IDR 13,300. The rate for one US dollar in 2014, 2015, and 2016 were IDR 12,440, IDR 13,795, and IDR 13,436, respectively.

and restaurants. The biggest concentration was in Lampung, with more than 6,000 boxes. This was not the only form of fund-raising that ABA engaged in, but it was by far the most lucrative.[45] Between 2013, when Fitria took over and 2020, when he was arrested, ABA raised Rp 104.8 billion (US$ 8 million) through charity boxes.

Fitria after his arrest claimed that he did not always know what the funds he transferred were used for, but it was clear during his first year as director that they were used for training the men selected to go to Syria under the so-called Sasana program.

ABA was supposed to send an official report to the Ministry of Religion and BAZNAS with details about the amount collected from donations, waqf and infaq, and where the funds were sent. Not surprisingly, it never recorded the amount sent to JI for internal purposes. "The figures," said Fitria, "were manipulated and entered as fictive data."[46] The real figures were sent to the *tajhiz* office in an excel file, but the actual transfers from ABA to the central office took place with individuals carrying envelopes of cash and handing it to a designated contact. The branch offices would electronically transfer the amounts set aside for JI to Fitria's personal bank account, with a note saying "SPP", an acronym for school tuition fees. They would then upload the transfer receipt to an app that JI created for the purpose of secure communications. The incoming funds would be audited internally, then Fitria would withdraw the amount going to the *tajhiz* office in cash and arrange to meet the designated official so he could personally hand over the money.[47]

E. Yayasan Perisai Nusantara Esa

Yayasan Perisai Nusantara Esa, another UPT, was established after more than a dozen JI members were arrested in 2014-15 for setting up a workshop in Klaten, Central Java, to produce homemade weapons. Two of those arrested were senior officials, including Khoirul Anam alias Bravo alias Ust. Batar, head of the of the *tajhiz* division, and his deputy, Suyata alias Jimi alias Ust. Yahya. JI began thinking about setting up a legal aid and advocacy organisation with several aims. JI suspects could get defence lawyers, the families could get legal help, and members could see that JI was concerned about their fate. By providing its own defenders, JI also could try to control the damage from information leaked by members after arrest and interrogation and ensure that it did not endanger the organisation and the families could get defenders that did not rely on the government. In these activities, Perisai worked closely with Achmad Michdan of the Muslim Defence Team (Tim Pembela Muslim, TPM), the go-to team for almost all Islamist suspects who did not choose to accept a government lawyer.

Within the JI structure, Perisai was under the control of the service (*khidmat*) unit of the *tajhiz* division from which it received its operating funds. Beginning in 2019, it also began receiving Rp

[45] ABA also raised funds online, where people could donate to one of fourteen different bank accounts. ABA also put donations cans in some urban office buildings. Each branch had a different name for the program. For example, the ABA Jakarta branch had Gerakan Seribu Pekerja (A Thousand Workers Movement, GESEK) that circulated donation cans in two companies, PT Altus, a company serving the oil and gas industry, and Graha Samali. The Baznas registration also helped them to ask for money from well-off figures and companies. In 2018, ABA submitted a written appeal for a contribution of Rp 30 million (over US$ 2,000) for the victims of the Lombok earthquake to participants of Islamic study groups who worked for Ciputra Cimone, part of a major corporate conglomerate in Jakarta.

[46] Trial dossier of Fitria Senjaya. op.cit.

[47] Ibid.

20 to 40 million (US$1,430 to US$2,860) a month from ABA.[48] By the end of 2019, ABA had transferred Rp.330 million (US$23,500) to Perisai, which by this time had branch offices in Semarang, Solo, Yogyakarta, Surabaya, Lombok, Bandung, Lampung and Medan. As the number of JI prisoners rose, Perisai began raising funds itself through a program called Contributions for Family Prosperity (Santunan Keluarga Sejahtera, SAKURA). It sent around proposals and placed collection boxes in public places, leaving the impression that it was collecting for the poor in general, rather than directing the aid to the families of convicted extremists.

Like the other UPTs, Perisai was formally registered as a *yayasan* and operated above ground, under the leadership of Dr Agus Purwantoro, a medical doctor and former prisoner who had been active in Poso until 2007.[49] It worked closely with the Muslim Defence Team of Achmad Michdan.

IV. CHARITIES LINKED (OR ONCE LINKED) TO PRO-ISIS GROUPS

Pro-ISIS charities were mostly devoted to raising funds to assist the hundreds of ISIS supporters arrested on terrorism charges and their families. Most lacked the membership base, institutional structure, or expansion strategy to raise funds for longer-term projects, although several of them diverted funds for violent uses.

The term 'pro-ISIS' encompasses a broad range of extremist groups in Indonesia. These include the once large but now much diminished nationwide organisations like Jamaah Ansharut Daulah (JAD) and Firqah Abu Hamzah as well as small but potent local insurgencies like Mujahidin Indonesia Timur (MIT). There are also smaller groups that emerged as local splinters of mostly non-violent extremist groups such as Majelis Mujahidin Indonesia (MMI).[50]

Unlike JI, these groups mostly lacked a systematic recruitment or indoctrination process. Also, unlike JI, their operational expenses were generally low, and their perceived needs were both immediate and urgent. Most were not focused on building a community support base, perhaps because so many were convinced that the end of the world was imminent.[51] Dues from members paid for meeting expenses, and wealthier members helped pay for one-time outlays such as purchasing explosives. Those who wanted to go to Syria either paid for themselves or got assistance from ISIS central through Indonesians already there.

As a result, only three significant pro-ISIS charities emerged. One was the above-mentioned Infaq Dakwah Center (IDC), led by former KOMPAK members. However, IDC dropped its pro-ISIS stance in 2018 and became more an extension of DDII than a proponent of violent extremism. It remains in operation. Gerakan Sehari Seribu (GASHIBU) focused on assisting convicted terrorists

[48] Trial dossier of Ahmad Zaini, op.cit. The exchange rate in 2019 was USD1=IDR 13,900.

[49] Dr Agus had been arrested in December 2008 in Kuala Lumpur together with Abu Husna on immigration violations as both were in transit en route to Damascus, allegedly for advanced study. They were deported, arrested on arrival, tried and sentenced, Dr Agus to eight years, Abu Husna to nine. They were released in 2013 and 2015 respectively.

[50] For a description and analysis of these various groups, see IPAC, "The Decline of ISIS in Indonesia and the Emergence of New Cells", Report No.69, 21 January 2021.

[51] Greg Fealy, "Apocalyptic Thought, Conspiracism and Jihad in Indonesia," *Contemporary Southeast Asia*, Vol.41, No.1, 2019, pp.63-85.

but also actively supported MIT. Several smaller groups attached themselves to GASHIBU. The third was the Azzam Dakwah Center (ADC) that started in 2015 as an effort to raise funds for the new caliphate. It became part of JAD, with funds going more for violent operations than for humanitarian aid.[52] Other groups, also devoted to helping the families of prisoners and "martyrs" (those killed in police operations in Indonesia or in fighting in Syria), were also active, including Aseer Cruee Center, Baitul Maal Ummah, and BM al-Islah. One of the smaller pro-ISIS charities, Dapur Ummahat Aseer (Kitchen of Prisoners' Wives), was funded by women concerned about mismanagement of funds.

A. IDC, GASHIBU and ADC

As noted earlier, IDC started its activities in 2009 and began to be identified with ISIS in 2013– the same year it officially registered with the Ministry of Law and Human Rights as a *yayasan*. In its distribution of aid to prisoners, it was seen for a while as favouring pro-ISIS prisoners, although it denied any discrimination. Its website, http://www.infaqdakwahcenter.com, states that IDC is "an independent institution, devoted to facilitating Muslims to channel their contributions in an appropriate, productive and multi-use way to those in need, and to support dakwah and the empowerment of the Muslim community."[53] It notes that its beneficiaries are orphans, converts, disaster and conflict victims, and families of activists "who have been struck by catastrophes and need immediate financial relief". It also claims that it funds the activities of preachers and clerics who need operational funding to ensure that the message of Islam is spread as effectively as possible.[54]

During its pro-ISIS years, most of the photos accompanying IDC's funding appeals were of children or wives of convicted terrorists who were suffering from tumours or cancer or other illnesses, with the caption, "Please help!" Funds could be transferred for general purposes through any one of 12 bank accounts, seven with shari'ah and five with regular banks, with an additional sixteen accounts for aiding orphans or supporting waqf (donations of land for Islamic purposes). IDC used much of the money raised until around 2018 to visit prisoners convicted of terrorism offenses and provide support for their families.

IDC's connections to Dewan Dakwah Islamiyah Indonesia–an organisation considered conservative, often intolerant, but non-violent–probably saved it from dissolution. There was never any suggestion that DDII's funds were diverted to support violence per se, although many of the prisoners it supported were clearly violent extremists.[55]

Unlike IDC, GASHIBU, established a year after IDC, stayed solidly in the pro-ISIS camp, supplying convicted terrorists with extra food and a monthly stipend while taking care of their families. It divided the target beneficiaries into five areas: Sumatra, Central Java, West Java, East Java, and eastern Indonesia. Each family received Rp 300,000 to Rp 500,000 (USD$21 to US$35)

[52] JAT was the organisation set up by Abu Bakar Ba'asyir in 2008, after a leadership dispute within MMI. JAT then split into pro-ISIS and anti-ISIS factions in 2014. The pro-ISIS wing became part of JAD.

[53] "Apa Itu Infaq Dakwah Center?", Infaq Dakwah Center website, http://www.infaqdakwahcenter.com/read/apa-itu-idc-voa-islam/13/.

[54] Ibid.

[55] IDC's beneficiaries included the murderers of a Protestant minister in Jepara, Central Java, who had converted from Islam. He was killed in December 2012. See: "PAKAR ungkap 9 Lembaga Amal di Indonesia Pendukung Terorisme", jaringanantikorupsi.blogspot.com, 16 February 2020.

per month with one of these areas having an approximate budget of Rp 25 million (US$ 1,750) per month.[56] They also managed guesthouses for family prison visits and arranged to meet loyal ISIS members to take them home after they were released. These methods strengthened prisoners' commitment to the extremist network and even helped recruit other prisoners who had no such sources of support.[57]

GASHIBU raised its funds mostly from ISIS sympathisers and donors. It also received money from ISIS central through Bahrumsyah, a prominent Indonesian ISIS leader in Syria until his death in 2017. In 2015, Bahrumsyah sent Rp.200 million (around US$ 14,500) in several instalments to Hendro Fernando, a former GASHIBU supporter and now anti-ISIS activist, who had been responsible for assisting jihadist families in Sulawesi and West Nusa Tenggara.[58]

GASHIBU was particularly committed to MIT in Poso. Its Poso contact, Maya Latief, was the wife of Benhard Onasis Patras, sentenced for four years in 2017 for providing supplies to MIT.[59] Benhard's support for MIT started in early 2015 when an MIT member asked him to pick up new recruits to join them in the mountains. In September 2015, an MIT supporter sent Rp 15.8 million (US$1,145) to Benhard's wife for the families of MIT members detained or killed. In October and November 2015, Hendro Fernando sent a total of Rp 5 million (US$ 360). Through GASHIBU, MIT also received over Rp 10 million (US$ 740) in 2016 from Sutomo alias Ustad Yasin, a major MIT donor in Poso, who was later arrested for terrorist activities.[60]

The funds collected by GASHIBU were distributed to support families of MIT prisoners and "martyrs" with a small proportion for MIT logistics. Benhard allocated a total of Rp 20.8 million (around US$ 1,500) for MIT families, each obtaining Rp 400,000 (US$ 28.5) per month.[61] In addition, he used Rp 4 million (US$ 285) from GASHIBU's account to buy medicine and mountain gear for MIT. He also delivered a GPS, walkie-talkies, and 100 kg of sago from Ambon. The discovery of a link between GASHIBU and MIT led the Indonesian government to put them on Indonesia's terrorist list in 2020 and freeze GASHIBU's bank account. GASHIBU collapsed as a result, and MIT was left without a key source of logistical support.

Azzam Dakwah Center (ADC) was not only pro-ISIS, but the entire organisation was a JAD front. It was led by Achmad Romadlan, once an active member of Jamaah Anshor Tauhid (JAT) in Solo, Central Java. In 2014, after Abubakr al-Baghdadi declared the establishment of a new caliphate,

[56] The exchange rate USD1=IDR14,000.

[57] In 2011, a convicted murderer named Herly Isfranko alias Hamzah decided to join an extremist study circle in Permisan prison, Nusa Kambangan, after knowing the benefits the convicted terrorism received. See IPAC, "Update on Indonesian Pro ISIS Prisoners and Deradicalisation Effort", Report No. 34, 14 December 2016, pp. 10.

[58] Bahrumsyah and Hendro met in Forum Aktivis Syariat Islam (Forum of Islamic Law Activitst) or FAKSI, one of the earliest pro-ISIS groups in Indonesia. See: IPAC, "Disunity among Indonesian ISIS Supporters and The Risk of More Violence", Report No. 25, 1 February 2016, pp. 9.

[59] Benhard's wife stated that she did not know that her bank account was used for MIT interests. See trial dossier of Benhard Onasis Patras alias Papa Isa alias Abi Akbar, North Jakarta district court, Decision No. 50/Pid.SUS.Teroris/2017/PN Jkt.Utr, 22 May 2017.

[60] Sutomo alias Ustad Yasin is a former JI teacher who became pro-ISIS and a major donor for MIT activities. He was not only supplying the terrorist group with money and logistics, but also responsible for continued radicalization through his pesantrens in Poso area. Ustad Yasin established pesantrens for children of MIT members and sympathisers. His arrest in September 2020 deprived MIT of much of its logistical support. More on Ust. Yasin, see: IPAC, "COVID-19 and the Mujahidin of Eastern Indonesia (MIT)", Short Briefing No. 3, 28 April 2020.

[61] Trial dossier of Benhard Onasis Patras, op.cit. The conversion rate to US dollar was IDR 14,000.

Romadlan joined a pro-ISIS group called Forum for Islamic State Supporters (Forum Pendukung Daulah Islamiyah, FPDI), led by three prominent JI members and Ngruki notables.[62] Together with some 200 others, they swore the bai'at to al-Baghdadi at the Baitul Makmur mosque in Sukoharjo, not far from the Ngruki pesantren.

In September 2015, Romadlan and two friends set up ADC with the intention of helping the new caliphate.[63] When JAD held its founding meeting in Malang, East Java in late November, Romadlan attended, representing Solo and shortly afterwards was tapped by overall amir Zainal Anshori to head JAD's Central Java branch. It was Anshori who suggested retaining the ADC name instead of openly calling themselves JAD to avoid problems with the police. ADC, the charity, thus effectively became the cover for JAD-Central Java, with Romadlan as head and Nur Solikin, a founding ADC member, as both secretary and treasurer.

ADC raised money by putting ads on hardline media sites, urging Muslims to contribute to help fellow Muslims in need. The ads listed a phone number for Romadlan, who called himself Ustad Azzam, and a bank account number for Nur Solikin. It also put collection boxes in various stores and restaurants. Some funds did go to ill relatives of convicted terrorists, but much of the income was used for ADC's routine operations including staff salaries (Rp.400.000 or US$ 28.5 a month) and travel and accommodation costs to visit detained mujahidin leaders such as Abu Bakar Ba'asyir and Abdullah Sunata.[64] ADC also used funds to shelter a wanted fugitive and cover the travel and other costs of a visit by Zainal Anshori and two others to Solo. In early 2016, ADC provided Rp 10 million (US $700) to build an affiliated mosque in Kendal, Central Java.

The ADC/JAD members were committed to violence, although any action was supposed to have the permission of Anshori as amir. Unlike JI, however, JAD was so loosely organised that it had no way to actually keep track of its members or enforce its policies. On 5 November 2016, without any permission from higher ups, a group of ADC members who called themselves Tim Sepuluh (Team of Ten) threw Molotov bombs at a minimart in Solo.[65] They were reportedly under the leadership of Nur Solikin and had used the ADC office to make and store the bombs. Another attack, this time on a restaurant in Sukoharjo, Solo, took place on 3 December 2016. Neither caused any deaths or serious injuries, and seem to have been sparked by the rising emotions around the time of the mass demonstrations in Jakarta to bring down the Christian governor because of alleged blasphemy. Then in mid-December, Nur Solikin became involved in a plot that would have involved Indonesia's first female suicide bomber–Dian Yulia Novi, his second wife–in an attack on the presidential palace.[66] The plot was concocted by the ADC group around Nur Solikin, with the help of an Indonesian ISIS operative in Syria, Bahrun Naim. Police foiled the attack, and with the arrests that followed, ADC activities came to a halt.

[62] The three were Dr Amir Machmud, Afif Abdul Majid and Abu Fida.
[63] Trial dossier of Achmad Romadlan alias Azzam, West Jakarta district court, Decision No 186/Pid.Sus//2018/PN Jkt Brt, 21 June 2018, pp.9.
[64] Ibid. pp.11-12.
[65] Ibid. pp.49.
[66] For more on Dian Yulia Novi, see IPAC, "Mothers to Bombers: The Evolution of Indonesian Women Extremists", Report No. 35, 10 May 2017.

B. The Smaller Pro-ISIS Charities

The height of pro-ISIS activity in Indonesia was in 2015-16, and several other erstwhile charities emerged at this time. Baitul Maal Ummah or BM Ummah was an "unofficial"–i.e. never registered–online charity set up by Aznop Priyandi and several friends in 2015, after discussions about how to help all the ISIS supporters arrested by police. Aznop, a Riau resident, was an ISIS supporter who distributed information on the Syrian conflict online. He set up channel after channel on Telegram, although they generally lasted only a few months before being removed by Telegram itself because of their pro-ISIS content and advocacy of violence. The first and largest of these, UKK Channel (short for Update on News of the Caliphate) attracted 6,000 followers. It also lasted the longest, from April to December 2015.[67]

Aznop and a few others who were all active on a chat group called Warkop (short for Warung Kopi) decided to set up Baitul Mal Ummah to help the prisoners' families as well as support the ISIS struggle more generally. He asked for volunteers who would be willing to let their bank account numbers be used. A man named Pepen Pranyoto came forward and sent Aznop his Bank Rakyat Indonesia (BRI) account information and his ATM card by courier. Aznop asked him to open other accounts at Bank Mandiri Syari'ah and Bank Central Asia, so that there would not be transfer costs for potential donors. Pepen obliged and within two months, BM Ummah was using four accounts, three in the name of Pepen and one in the name of another Warkop friend.

From 2016 to 2017, BM Ummah collected Rp 11 million (US$ 815). Some of it was used for the families and some was used for a pro-ISIS pesantren in Poso. But it was also used to conduct military training, buy knives for use in attacks as well as a pistol and bullets, and support the operational costs of JAD-Medan. The JAD-Medan branch, which was never recognised by JAD's headquarters, was planning attacks on police and Shi'a associations (Aznop was particularly upset by the presence of Afghan Hazara immigrants in Riau).[68] Aznop was arrested in August 2017, and BM Ummah ceased to exist thereafter. Upon his release, Aznop joined a group of former prisoners working with police to help others disengage.

There were many other small local groups like BM Ummah that appeared, mostly in the period 2015 to 2017. They included Anfiqu Center, Gubuk Sedekah Amal Ummah (GSAU), RIS al-Amin, Aseer Cruee Center, Baitul Mal-al-Izzah, Baitul Mal al-Muuqin, and Muhzatul Ummah.[69]

[67] Three days after the first channel was removed, Aznop started another Telegram channel, called "UKK Chanel" with only one "n". It attracted 2,500 followers and lasted for two months before Telegram removed it. The next one was just called UKK. It got 4,000 followers and lasted five months. The next one, also called "UKK", lasted six weeks. The next one, opened in early 2017, was called "Melawan Arus" and lasted only a month. Two weeks later, Aznop opened a channel called "No Pain", which lasted two weeks. Each of these channels was advertised on public Telegram channels such as Warkop, Grup Pemuda Tauhid, and Mudik Bareng, all of which also disseminated ISIS updates and propaganda. See trial dossier of Aznop Priyandi alias Abu Haura, North Jakarta district court, Decision No. 42/Pid.Sus-Teroris/2018/PN Jkt Utr, 22 May 2018, pp.7-9.

[68] Aznop Priyandi testimony in verdict in the name of Pepen Pranyoto, Decision No. 1501/Pid.Sus/2018/PN Jkt Utr.

[69] See PAKAR,"Lembaga Amal Pendukung Terorisme", radicalismstudies.org, 26 January 2020. This article, while providing a useful if not comprehensive list, fails to note that many of the ex-prisoners it names have since disengaged from violence.

Allegations of lack of transparency and misuse of funds were frequent. A BM Ummah administrator was said to have used charity funds to pay for his own wedding party.[70] Many were accused of bias in selecting participants, not just favouring those from their own organisation or ideological persuasion, but also failing to reach those most in need because charity administrators assumed everyone could be reached through a smart phone.[71]

These shortcomings caused one pro-ISIS woman, Tutin Sugiarti, to set up her own fund-raising effort through a Telegram channel called "Kitchen of Prisoners' Wives" (Dapur Ummahat Aseer), figuring that women–herself in particular–would be more reliable. She had tried raising funds earlier from her Facebook page through a posting called Infaq Daulah with unknown but likely unsatisfactory results since she turned to other means. She then joined a group on Telegram called the "Kitchen Coordination Group" (Grup Koordinasi Dapur) consisting of representatives of ADC, IDC, GASHIBU, a small group called BMT al-Izzah, and Tutin's own Dapur Ummahat. Tutin seems to have sent funds on a monthly basis to two women in Solo, one the wife of a prisoner and the other a woman who had recently been divorced by her husband. The charity had little impact and does not seem to have lasted very long, but it was through this channel that Tutin drew closer to would-be suicide bomber Dian Julia Novi and helped arrange her marriage to Nur Solikin of ADC.

Some donors believed women would be more receptive to stories of hungry families and sick children and played on their emotions. Whether it was this approach that made the difference or not, many women donated to pro-ISIS charities. Three Indonesian female migrant workers, Turmini, Retno Hernayani and Anindia Afiyantari, were convicted in Singapore in 2019 for terrorism financing. All had sent funds to the online charity called Aseer Cruee Center that exclusively focused on prisoners.[72] Migrant women in Hong Kong were also among the donors to other pro-ISIS charities and helped administer a small one, also likely short-lived, called OneMind.[73]

C. The "Rumah Singgah" and Other Aid to Prisoners' Families

A substantial part of extremist charity donations went to rent houses near major prisons, where families of prisoners could stay while visiting their incarcerated relatives. These were called *rumah singgah* or guesthouses. They were associated with other services to the families, such as providing monthly stipends, scholarships for children, and picking up prisoners on the day of their release and accompanying them home. Since families sometimes stayed for months at a time, particularly those from islands off Java, the expenses could be considerable. They also served as indoctrination centers, where regular religious study sessions were held. As the number of inmates in Indonesian prisons grew, these places became the sites where splits among extremist organisations were played out.

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[70] IPAC, "Mothers to Bombers", op.cit, pp. 19.

[71] Ibid.

[72] Turmini sent the largest amount of a total of Rp 13 million (US$ 907) while Retno collected SG$ 100 from friends and added SG$ 40 herself, amounting to SG$ 140 or US$104.Anindia sent SGD 130 (US$ 97) in five instalments to her Indonesian counterpart between February and July 2019. Linette Lai, "3 Indonesian maids charged with financing terrorism after being detained under ISA", straitstime.com, 23 October 2019.

[73] IPAC, "Mothers to Bombers", op.cit, pp. 19.

Two events in May 2018 affected the charities and their *rumah singgah*. A deadly uprising of terrorist suspects at the Brimob prison led inmates to be moved either to Super-Maximum Security facilities on Nusakambangan, Central Java or to a relatively new prison and detention centre in Gunung Sindur, Bogor, West Java. The coordinated bombings in Surabaya a week after the uprising led to the rapid adoption of a strengthened anti-terrorism law. The new law allowed police to conduct "preventive strikes", causing the number of prisoners again to rise sharply. Nearly 400 prisoners were arrested in 2018 alone, most of them after May. They included a few of the major donors to pro-ISIS charities.[74]The new law led IDC to reconsider its assistance to terrorist families. It stopped putting appeals for prisoner families on its website and in 2019, it began to phase out the aid program, with the *rumah singgah* the last to go. In its place, it began a program to aid families of "Dakwah Mujahid and Islamic Activists". "Dakwah Mujahid" were clerics who went to preach in far-flung areas of Indonesia, including those that were considered vulnerable to Christian conversion, while "Islamic activists" generally meant those engaged in anti-vice campaigns. Funds for families of imprisoned terrorists focused primarily on educational programs, such as providing scholarships to children to study in Qur'an memorization schools. With IDC largely (but not entirely) gone, other charities teamed up. For example, GASHIBU joined with the Aseer Cruee Center and Anfiqu Center to manage the *rumah singgah* in Cilacap, near Nusakambangan. In the Jakarta area, IDC continued to work with GASHIBU and Muhzatul Ummah to manage a *rumah singgah* for visitors to inmates in Gunung Sindur and others in Depok and Bekasi. It also ran its own *rumah singgah* in Solo, Central Java. These guesthouses were mostly run by wives of prisoners.

With IDC's departure from the Cilacap house, which served families of the most hardcore, high-risk offenders, the other charities deemed that only families of ISIS supporters detained in Super-Maximum Security prisons could receive aid. Any inmate who was transferred out of a supermax was considered to have collaborated with the government and was therefore to be shunned. The charities also decreed, given the limited funds, that the *rumah singgah* was to be reserved for families living on islands other than Java and they could stay up to three months without charge. For families on Java, Anfiqu Center arranged with a travel agency to pick up family members at their home and drive them to the prisons for visits.

In 2020 the pandemic struck, and the Corrections Directorate of the Ministry of Law and Human Rights put in place a new policy that family visits could only be conducted online. The *rumah singgah* in Gunung Sindur and Cilacap were forced to close, though the ones for Depok, Bekasi and Jakarta remained open. Some charities enlisted the online hashtag #BM_Networking to reach out to more donors and beneficiaries who needed their services.[75] But then a second blow struck. GASHIBU was placed on the Indonesia's list of suspected terrorists and terrorist organisations (DTTOT, see section V) for funnelling cash to Poso, together with its top staff, Agung Setyadi and Abdul Aziz, both ex-prisoners who had worked with Noordin Top. The assets of all were frozen.

[74] Two of them were Armaedi alias Abu Mufid and Ricky Perkasa Yudha alias Abu Jaisy.

[75] Among those using the hashtag were Fastabiqul Khoirot, Uma Nami (only in Bima, West Nusa Tenggara), At ta'awun, Lan Tabuur, GSAU (Gerakan Sedekah Amal Ummah), Bangun Rumah Akhirat, BM Muhzatul Ummah, and Khummah Center.

This left Muhzatul Ummah and Lan Tabuur to manage the Depok and Cikampek houses respectively and regularly assist prisoner families with other forms of aid.[76] As of February 2022, Lan Tabuur allocated a monthly budget of Rp 60 million (US$ 4,200) to provide for 100 families, 30 families in the guesthouses, and scholarships for 31 students around greater Jakarta and West Java.[77] Education of children–seen as the next generation of mujahidin–was also a priority. Muhzatul Ummah used some of its funds to build a pesantren, called al-Muhajirin, in Megamendung, Bogor that it hoped might replace Ibn Mas'oed, the pro-ISIS pesantren shut down by the Indonesian government.

By 2020, the *rumah singgah* had become so important to extremist charities that police decided to set up one of their own *rumah singgah* in Cilacap, near the Nusakambangan prison complex. As infighting led to the ending of aid programs for a group of families suddenly cast out from the group, the police could move in and offer to help, thus aiding disengagement efforts.

V. GOVERNMENT RESPONSE TO EXTREMIST CHARITIES

The Indonesian government faces many obstacles in curbing extremist charities. After a slow start, it is demonstrating increasing effectiveness and political will to overcome them, in part because of international pressure to do so, but also because there is growing awareness that it is in Indonesia's interest to stem the flow of funds to these charities.

The problems in halting extremist fund-raising are obvious. Many of the charities are unregistered and operate only as social media posts with bank account numbers. Those that are registered often have perfectly legal as well as clandestine activities, so that it can be difficult to detect the latter. Terrorist actions in Indonesia are cheap and with a few major exceptions in the 2000-2004 period like the 2002 Bali bombing, are usually domestically financed, so that funds sent to or from these charities within Indonesia may not attract attention.[78] The sheer volume of financial transactions that government institutions have to watch means that small-scale transfers often go unnoticed. Then too, drawing a line between humanitarian fund-raising by non-violent Islamist organisations such as PKS or MER-C and extremist groups is not always easy.

The use of collection boxes for zakat or disaster victims or other worthy causes is so ubiquitous that it would be nearly impossible for the national agency BAZNAS to detect skimming by extremist organisations unless there were to be a radical overhaul of monitoring and accounting procedures – which may indeed be needed.

There is also a huge political issue. Linking Islamic institutions to extremism is always highly charged, so that tentative efforts to close extremist schools or mosques or even increase government oversight tends to be met with outrage, not just from the extremists but from

[76] Muhzatul Ummah, a much smaller group, was affiliated with Jamaah Anshorul Khilafah (JAK). Lan Tabuur, on the other hand, was managed by Agus Barel, a former prisoner. The charities provided meals, snacks, and a monthly stipend of Rp 300,000 (US$ 21) for jihadist families. Children could go to school while the mothers joined religious study groups (*pengajian*) to learn more about ISIS teachings.

[77] Lan Tabuur Facebook Post, 8 February 2022, https://bit.ly/3Dri7XR.

[78] The other major attacks with international funding included the 2003 Marriott bombing.

mainstream Muslims, who are worried about state stigmatization of Islam. Periodic government efforts to certify preachers as "moderate" or blacklisting others as "radical" have also drawn an angry public response. It has not helped that most of the initiatives to weed out "radicalism" have been poorly thought through and lacking in clear criteria. Many of them also encourage "report on your neighbours" tactics without any process of redress or appeal for those targeted.[79]

Any government effort to obstruct humanitarian giving would be equally unpopular unless it was based on persuasive evidence of misuse or a link to violence of the groups seeking funds, and this tends to only come out in trials, after those responsible for the charities have been arrested for something else.

A. Indonesia's Efforts to Comply with International Standards

In the wake of the Bali bombs, Indonesia responded, belatedly, to international pressure to upgrade laws and enforcement measures for preventing money laundering and terrorist financing. The main organization exerting this pressure has been the Financial Action Task Force (FATF), an inter-governmental agency founded in 1989 as a global watchdog to set standards for combatting organized crime, corruption, and terrorism.[80] It monitors some 200 countries to ensure compliance with its standards and has a blacklist for countries that fail to meet them. The standards involve adopting a regulatory framework for addressing money laundering and terrorist financing, assessing risks, taking measures to mitigate those risks, and ensuring "customer due diligence", including a commitment to scrutinising financial transactions and maintaining good record-keeping. Compliance is then assessed by the FATF directly or by partner organisations known as "FATF-Style Regional Bodies". In Asia, this body is the Asia/Pacific Group on Money Laundering (www.apgml.org). Its last evaluation of Indonesia was in 2018.

Indonesia had been on the FATF blacklist for shortcomings on terrorist financing, but it was removed in 2005, in part for passing an anti-terrorism law, adopting the U.N. List of Suspected Terrorists and Terrorist Organisations (*Daftar Terduga Teroris dan Organisasi Teroris*, DTTOT), compiled under UN Security Council Resolutions 1267 and 1373, and moving to ratify the International Convention for the Suppression of Financing Terrorism, which happened in 2006. It was put back on the blacklist in 2012 for failing to address certain "strategic deficiencies", which meant insufficient follow-up after identifying risks or suspicious transactions.[81] This led the FATF to issue a warning against doing business or investing in Indonesia. In a concerted effort to remove itself from this list, Indonesia passed Law No.9/2013 on the Prevention and Eradication of Terrorist Financing that for the first time criminalized all forms of financial support for terrorism.

One problem for Indonesia was that initially, some of the standards seemed to have little relevance. For example, countries were required "to freeze without delay the funds or other assets" of anyone on the U.N. Security Council's list of terrorists, but most of the Indonesians on the list had no

[79] IPAC, "The Crackdown on Islamist "Radicals" in Indonesia", Report No.71, 25 May 2021; Greg Fealy, "Jokowi's Repressive Pluralism", East Asia Forum, 27 September 2020

[80] FATF website, https://www.fatf-gafi.org/about/whoweare/

[81] "Pakistan, Indonesia join money-laundering blacklist," Reuters.com, 16 February 2012, and "Indonesia back on 'blacklist – but is it fair?", baliadvertiser.biz, 2012. Pakistan, Ghana, Tanzania and Thailand were also added to the blacklist in 2012, joining Bolivia, Cuba, Ethiopia, Iran, Kenya, Myanmar, Nigeria, North Korea, Sao Tome and Principe, Sri Lanka, Syria and Turkey.

significant assets to freeze at home or abroad, and none of the other designated terrorists had assets within Indonesia. As a result, adopting targeted sanctions against them was not a high priority. But failure to freeze terrorist bank accounts was precisely one of the shortcomings that kept Indonesia on the blacklist. In February 2015, it issued the necessary regulations and was restored to the good graces of the FATF.[82]

Another problem has been the UN list, the DTTOT, itself. The list is perpetually out of date and is a strange mix that leaves out some of the most notorious terrorists and includes several who were never involved in violence. Many of the Indonesians on it were added by other governments, in particular the U.S. as all those designated as terrorists by the U.S. Treasury automatically go on the U.N. list. On the other hand, most of those convicted of terrorism by Indonesian courts never make it onto the list. This may be in part because of the bureaucratic procedures involved in placing new names on the list (let alone removing old ones) but also because enforcing sanctions against those listed could complicate government efforts at rehabilitation and reintegration. It is telling that there are only 61 Indonesian individuals on the 2022 list, whereas more than 1,100 have been convicted of terrorism and hundreds are awaiting trial.[83] Most of those listed have been tried and convicted, though a few are long-term fugitives.[84] Indonesia may be reluctant to share the names of other wanted terrorist suspects, especially when the general public can easily access the list.

Another issue is that those who have long since paid their debt to society by serving a prison sentence are never taken off, even when they constitute little threat of recidivism. It would be useful to have an automatic procedure for triggering a review of a prisoner's presence on the list when he or she is released and periodically thereafter. There is no point in programs trying to assist released prisoners with income-generating activities if the Indonesian government is supposed to be freezing their bank accounts. Although Indonesia is required to review the list every year, it still includes several who have died, some who should be taken off for good behaviour, and others who should never have been put on it in the first place.

All this said, Indonesian police now recognise the value of the list and the power of freezing assets. They saw, for example, how freezing the bank accounts of Ust. Yasin and his wife Mei Ekowati in Poso effectively stopped most outside supplies to MIT in Poso.[85] The threat of putting an individual or organisation on the list with all the consequences involved now constitutes a potent means to compel it to cease certain activities.

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[82] Chief Justice of the Supreme Court, Minister for Foreign Affairs, Chief of Indonesian Police and Head of PPATK, "Joint Regulations on Listing of Terrorists and Terrorist Organisations and Freezing of Funds 2015", known as the Joint Terrorist Financing Freezing Regulations.

[83] The 2022 list can be viewed at https://www.ppatk.go.id/backend/assets/uploads/20220216100426.pdf. Among the deceased persons still on the list are Fihir alias Fihiruddin Muqti alias Abu Jibril (died January 2021); Ali Kalora (died September 2021) and five men known to have died in Syria: Usman Bahrumsyah (died 2017); Bachrun Naim (died 2018); Salim Mubarok Attamimi (died 2016); Acep Ahmad Setiawan (died 2015); and Muhammad Syaifuddin alias Mohammed Yusop Karim Faiz (died 2019). Between 2021 and 2022, one other deceased person, Tuah Febriwansyah alias Mohammed Fachry, was removed from the list, five years after he died in custody in 2017 of natural causes.

[84] Zulkarnaen, JI's head of military affairs, was on the list since it was first drawn up; he was finally captured in Indonesia in 2020.

[85] They are No. 404 and 405 on the 2022 DTTOT list.

B. The Charities on the U.N. List

In addition to individuals, the list also includes 28 organisations in Indonesia designated as terrorist entities. This is also a strange assortment. Fifteen of the entities listed are provincial branches of Abdurrahman bin Auf Foundation, the JI charity described above. Four are extremist organisations with a proven track record of violence, such as JI, MIT, JAT and JAD. Majelis Mujahidin Indonesia (MMI) is also included, though it would be difficult to prove that MMI as an institution had been directly involved in terrorism, despite having had Abu Bakar Ba'asyir as its amir from 2000-2008 and its clear support for violent jihad.[86] MMI did serve as a gateway to pro-ISIS activities in some areas, including West Sumatra.[87] In February 2022, the U.S. Treasury put MMI's charity, World Human Care, on its list, meaning it will shortly be similarly designated as a terrorist entity by the U.N.

Most of the other entities listed by the U.N. are charities already mentioned in this report: Hilal Ahmar Society Indonesia (HASI), Syam Organizer, Aseer Cruee Center, and Gashibu. Azzam Dakwah Center (ADC), the JAD front, never appeared on the list, perhaps because it so quickly faded from view after its role in the December 2016 plot to bomb the presidential palace was exposed. A charity that did make it to the list was so obscure as to make one wonder why it was mentioned at all: Rumah Qur'an Sama Taat or RQ Sama Taat, an institution that existed only in the minds of its would-be founders. It apparently was put on the list because the husband-wife team were using its name to try and raise funds through a Telegram account to help pro-ISIS detainees involved in a prison uprising in May 2018.[88] It should have been enough that the couple involved were arrested and convicted.

Two other charities on the list, the Abu Ahmed Foundation and Muslimah Bima Peduli, based in Bima, were linked to a British woman named Tazneen Miriam Sailar. A Christian convert to Islam, Tazneen is the widow of an Indonesian from West Java killed in Syria in 2015 fighting with Jabhat al-Nusra. Her late husband, a member of JAT, was Acep Ahmad Setiawan, known as Abu Ahmed, for whom the foundation was named. They were married by Abu Bakar Ba'asyir. Both she and he are listed on the 2022 DTTOT, though he is obviously long dead. Tazneen, who had come to Indonesia in 2005 as a volunteer for a Christian aid mission, had tried to raise funds for women and children affected by the Syrian conflict, with the help of other civil society organisations around Indonesia, including Muslimah Bima Peduli. It remained unclear as of March 2022 how much she raised, who the beneficiaries were, and how much was used for humanitarian purposes. Tazneen was arrested on immigration violations in December 2020, but the investigation into her activities was said to be ongoing.

Despite these issues, the UN list can serve as a powerful tool in dissuading charities from supporting terrorist activities. This can be seen in the case of IDC, which modified its behaviour

[86] See for example, trial dossier of May Yusral alias Umar alias Abu Hani alias Umar al-Faruq alias Haji alias May bin Tahardiman", East Jakarta district court, Decision No. 395/Pid.Sus/2019/PN.Jkt Tim, 31 July 2019. The document described how the MMI branch in West Sumatra collected funds for fighters in Syria.

[87] See IPAC, "Learning Lessons from Extremists in West Sumatra, Report No.62, 28 February 2020.

[88] Marifah Hasanah and her husband Amiruddin were behind RQ Sama Taat. Both are on the DTTOT as individuals.

after the Indonesian police reportedly used the threat of placing it on the list to force it to stop funding extremist prisoners and their families.[89]

Overall, then, pressure from the FATF has been constructive. Risk assessment has improved, though the tendency is still to look backwards to the last attack rather than forward, to think about possible tactics not yet used. The main Indonesian agency for monitoring suspicious transactions, the Financial Transaction Reports and Analysis Centre (Pusat Pelaporan dan Analisis Transaksi Keuangan, PPATK), has become a competent body that has benefited from international training. Some weaknesses remain, however, and coordinated efforts will be needed to addressing extremist fund-raising.

C. What More Should Be Done?

The 2018 evaluation of compliance and implementation of Indonesia's anti-terrorist financing measures by the Asia Pacific Group on Money Laundering found it much improved but still deficient in several areas.[90] The priority actions recommended were useful but did not specify the technical steps that Indonesia most needs to take.

The recommendations included the following:

- "Continue to improve implementation of terrorist financing sanctions (TFS) […] by adding new UN Security Council Resolution (UNSCR] 1267 listings to the DTTOT list without delay; and enhance the use of the UNSCR 1373 framework to combat Indonesia's and regional terrorist financing risks."

This recommendation continues to see the deeply flawed U.N. list as central to Indonesian effectiveness, which may not be the case. Another flaw is APGPL's use of number of arrests on terrorist financing charges as an indication of effective policy. The FATF and APG have repeatedly cited Indonesia's low numbers of arrests for terrorist financing or money laundering as a sign of weak implementation of international standards, even though they have sharply risen in recent years.

The problem is that it is not clear that this is a useful metric. A low number of arrests could mean good prevention or poor enforcement; a high number could suggest strong enforcement or a high incentive for arrests in a weak criminal justice system that could encourage wrongful arrests. The numbers arrested in Indonesia in fact rose after police began using the 2013 law against individuals who had purchased air tickets for themselves or others to travel to Syria to join ISIS or other militias, although the suspects were usually charged under the anti-terrorist law as well.

The next recommendation was far more pertinent, if one can wade through the bureaucratic language:

- "Continue to refine competent authorities' understanding of the subset of at-risk non-profit organisations in formal and informal non-profit sectors. Improve supervision and

[89] IPAC interview, Jakarta, 19 March 2022.
[90] APG, "Anti-money Laundering and Counter-terrorist Financing Measures – Indonesia, Third Round Mutual Evaluation Report", APG, Sydney, September 2018.

> monitoring of at-risk non-profits and where violations are identified, impose proportionate and dissuasive sanctions or take other action."

This recommendation gets at the trickiest part of the problem of terrorist financing in Indonesia, which is extremists' use of non-profit foundations – *yayasan* – to fund their activities. It is particularly problematic because the law governing *yayasan*s is what allows NGOs of all kinds, including human rights, anti-corruption and women's rights organisations, to legally exist, and any new restrictions intended to restrict one kind of foundation could affect the rest, in an atmosphere where democratic space under the Jokowi government is narrowing. The last thing Indonesia needs is more restrictions on civil society. Any suggestions to increase vetting of Islamist humanitarian organisations would not only be unfair to the very reputable and effective Muslim organisations that provide aid to vulnerable groups but also would likely increase the problems that NGOs critical of the government face in getting operational permits or visas for foreign staff. When Indonesia tried to address the problem of lack of transparency among NGOs by issuing a new regulation on mass organisations (Perpu Ormas) in 2017 with a provision for improving transparency, it was rightly criticised by NGOs themselves for potentially limiting their freedom of association.[91] All this underscores the political difficulties that lie ahead.

VI. CONCLUSIONS

Charities have been a source of funds for violent extremist organisations in Indonesia since the Ambon conflict erupted in 1999. Together with member dues and donations from well-off supporters, charities not only help finance operations but also help ensure solidarity and ideological uniformity among members, particularly when the funds are used in part to support arrested colleagues and their families.

To the extent that Indonesia has weakened extremist charities, it has mostly accomplished this through arrests of individuals who provided information to interrogators about the charities, how they worked and who their senior officers were. Few, if any, of these charities were exposed through audits, even though many were legal entities registered with the Ministry of Law and Human Rights or with the National Zakat Agency, BAZNAS – and many were deliberately falsifying the amount of their income and how it was used.

Given the 2021 MOU between the Ministry of Finance and PPTAK, designed to enhance cooperation to prevent money-laundering and terrorism financing, the two organisations might usefully invite BAZNAS to explore what proactive measures could be taken to identify violent extremist charities seeking registration and ensure the application is denied, or if already registered, to subject their reports to a specially-designated team of auditors. Critical to this

[91] The regulation was used to justify the banning of Hizbut Tahrir Indonesia, a non-violent organisation, for supporting Islamic caliphacy. Major mainstream Islamic organisations supported government's decision but more critical voices, including human rights defenders, worried the regulations can be applied broadly to silence critics. See: Amnesty International, Indonesia: Amendments of the Mass Organizations Law Expand Threats to The Freedom of Association, 12 July 2017.

process, however, will be a clear and credible definition of "violent extremist", so that legitimate Muslim charities, or indeed any other humanitarian charities, are not inadvertently penalised.

Working out a procedure for identifying and halting extremist fund-raising in the name of humanitarian appeals might help Indonesia in its quest for membership in the FATF. The country has managed its terrorism threat reasonably well over the last two decade. Improving its management of extremist charities would close one of the remaining loopholes.

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