



# Security Council

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## Letter dated 27 January 2020 from the Panel of Experts on Yemen addressed to the President of the Security Council

The members of the Panel of Experts on Yemen have the honour to transmit herewith the final report of the Panel, prepared in accordance with paragraph 6 of resolution [2456 \(2019\)](#).

The report was provided to the Security Council Committee established pursuant to resolution [2140 \(2014\)](#) on 27 December 2019 and was considered by the Committee on 10 January 2020.

We would appreciate it if the present letter and the report were brought to the attention of the members of the Security Council and issued as a document of the Council.

*(Signed)* Dakshinie Ruwanthika **Gunaratne**  
Coordinator  
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\* Reissued for technical reasons on 10 February 2020.



## Final report of the Panel of Experts on Yemen

### *Summary*

After more than five years of conflict, the humanitarian crisis in Yemen continues. The country's many conflicts are interconnected and can no longer be separated by clear divisions between external and internal actors and events. Throughout 2019, the Houthis and the Government of Yemen made little headway towards either a political settlement or a conclusive military victory. In a continuation from 2018, the belligerents continued to practice economic warfare: using economic obstruction and financial tools as weapons to starve opponents of funds or materials. Profiteering from the conflict is endemic.

In the south, the Government of Yemen confronted the military challenges posed by the forces affiliated with the southern transitional council. The vice-president of the council, Hani Ali Salem Binbrek, initiated a conflict when he used force to remove what little authority the Government of Yemen held in Aden. Ongoing clashes on the Abyan and Shabwah borders and the limited progress in the implementation of the Riyadh Agreement indicate that the situation in the south remains volatile.

In the north, the Houthis continued to consolidate their political and military control, in particular through their pervasive intelligence services, which include both the preventative security and a new security and intelligence bureau. Houthi forces also engaged in the brutal suppression of tribal opposition and political dissent. The Panel of Experts on Yemen has identified a Houthi network involved in the repression of women who oppose the Houthis, including through the use of sexual violence, headed by the director of the Sana'a-based criminal investigation department, Sultan Zabin.

Throughout most of 2019, the Houthi forces continued and intensified their aerial attacks on Saudi Arabia. In addition to the previously known weapon systems, they used a new type of Delta-design uncrewed aerial vehicle and a new model of land attack cruise missile. The Panel has investigated the high-profile attack on 14 September 2019 on the Saudi Aramco facilities in Abqaiq and Khurays and finds that, despite claims to the contrary, the Houthi forces are unlikely to be responsible for the attack, as the estimated range of the weapon systems used does not allow for a launch from Houthi-controlled territory. Nevertheless, a number of other attacks on Saudi Arabia can clearly be attributed to the Houthi forces.

Following the attack in September, the Houthis made a public offer to establish a ceasefire. The ceasefire has been broadly complied with. Both Saudi Arabia and the Houthis now publicly state that they are engaged in discussions, while the launching of longer-range uncrewed aerial vehicles and missile strikes by Houthi forces against Saudi Arabia has abated.

With regard to potential violations of the targeted arms embargo, the Panel observes two major trends: the first is the transfer of commercially available parts, such as uncrewed aerial vehicle engines, servo actuators and electronics, which are exported from industrialized countries through a network of intermediaries to the Houthi-controlled areas of Yemen, where they are integrated into locally assembled uncrewed aerial vehicles and waterborne improvised explosive devices; the second is the continued reception by Houthi forces of military support in the form of assault rifles, rocket-propelled grenade launchers, anti-tank guided missiles and more sophisticated cruise missile systems. Some of those weapons have technical characteristics similar to arms manufactured in the Islamic Republic of Iran. For both commercial parts and weapons, the main smuggling route seems to run overland from Oman and the southern coast of Yemen, through territory controlled by the

Government of Yemen, towards Sana'a. The high-profile seizure on 25 November 2019 of a dhow carrying anti-tank guided missiles and other missile parts in the Arabian Sea indicates that, as in previous years, sea transport continues to play a role in potential violations of the targeted arms embargo.

The absence of the rule of law and oversight in Yemen allows for the illicit enrichment of a small number of predatory entrepreneurs, some of whom hold official posts in public institutions. Within this context, and with the lack of any accountability, national wealth and external aid are increasingly either diverted or lost owing to corrupt practices by officials of the Government of Yemen and the Houthis. As tools of economic warfare, the parties have created obstacles to block the financing of the importation of goods and caused delays for the vessels carrying them to Yemen.

The Panel found indications of illicit enrichment through the manipulation of foreign exchange rates by the Central Bank of Yemen in Aden. The Panel found that the Houthis were involved in cases of violations of asset freeze measures by allowing the diversion of frozen assets and public funds through false contracts for the benefit of individuals acting on behalf of Abdulmalik al-Houthi (YEi.004). Saleh Mesfer Alshaer, a Houthi general in charge of logistics, was also instrumental in the diversion of funds unlawfully appropriated from Houthi opponents.

Violations of international humanitarian law and international human rights law continued to be widely committed by all parties in Yemen with impunity. The air strikes conducted by the Coalition to Support Legitimacy in Yemen, led by Saudi Arabia, and the indiscriminate use of explosive ordnance, including landmines, by Houthi forces continue to disproportionately affect civilians and civilian infrastructures. Arbitrary arrest and detention, enforced disappearances, ill-treatment and the torture of detainees continue to be conducted by the Government of Yemen, Saudi Arabia, the Houthis and the forces affiliated with the United Arab Emirates. In Aden, the absence of the rule of law allows armed groups affiliated with the United Arab Emirates to conduct such violations and to operate outside the control of the Government of Yemen. Threats and acts of violence against humanitarians, as well as administrative hurdles to the delivery of assistance, are increasing in Houthi-controlled areas.

## Contents

	<i>Page</i>
I. Introduction . . . . .	5
II. Challenges to the peace, security and stability of Yemen. . . . .	6
A. Web of conflicts in Yemen . . . . .	6
B. Houthis fighting the Government of Yemen . . . . .	8
C. Suppression of dissent by the Houthis. . . . .	10
D. Changes to the military posture in areas under the control of the Government of Yemen and/or the Coalition to Support Legitimacy in Yemen . . . . .	12
E. Ongoing antiterrorism operations against Al-Qaida in the Arabian Peninsula and Islamic State in Iraq and the Levant . . . . .	15
F. External links with the Houthis . . . . .	17
G. Riyadh Agreement. . . . .	17
H. Fragile economy of Yemen. . . . .	18
III. Arms and the implementation of the targeted arms embargo . . . . .	18
A. Uncrewed aerial vehicles . . . . .	21
B. Land attack cruise missiles. . . . .	23
C. Illicit trafficking in small arms and light weapons. . . . .	25
D. Supply patterns for commercial civilian components used in Houthi uncrewed aerial vehicles . . . . .	25
IV. Economic context and overview of financing activities. . . . .	26
A. Illicit revenue in areas controlled by the Houthis. . . . .	26
B. Illicit financing . . . . .	28
C. Diversion of public funds by officials associated with the Government of Yemen . . . . .	28
D. Monitoring of asset freeze measures . . . . .	31
V. Acts that violate international humanitarian law and human rights law . . . . .	36
A. Acts and incidents attributed to the Coalition to Support Legitimacy in Yemen and to the Government of Yemen . . . . .	36
B. Acts and incidents attributed to the Houthi forces . . . . .	42
C. Gender-based violations. . . . .	44
D. Recruitment and use of children in armed conflict. . . . .	44
VI. Obstruction of the delivery and distribution of humanitarian assistance . . . . .	45
A. Obstruction of the delivery of humanitarian assistance . . . . .	45
B. Obstruction of the distribution of humanitarian assistance . . . . .	45
VII. Recommendations . . . . .	46
Annexes* . . . . .	48

\* The annexes are being circulated in the language of submission only and without formal editing.

## I. Introduction

1. The present report, provided to the Security Council pursuant to paragraph 6 of Council resolution [2456 \(2019\)](#), covers the period from 1 January to 31 December 2019 and includes updated findings from the continuing investigations that were presented in the midterm update of 25 June 2019 of the Panel of Experts on Yemen. During its investigations, in line with paragraph 11 of resolution [2456 \(2019\)](#), the Panel complied with the best practices and methods recommended by the Informal Working Group of the Security Council on General Issues of Sanctions (see [S/2006/997](#)) and maintained the highest achievable standards of proof, even while not able to travel widely within Yemen.<sup>1</sup> All major locations in Yemen are spelled according to the spellings used in the United Nations Geographic Information System map in annex 2.
2. In conformity with paragraph 7 of resolution [2456 \(2019\)](#), the Panel has maintained cooperation with the Analytical Support and Sanctions Monitoring Team and with the Panel of Experts on Somalia.
3. In the course of their investigations, Panel members travelled to Djibouti, Egypt, France, Greece, the Islamic Republic of Iran, Israel, Jordan, Lebanon, Oman, Qatar, Saudi Arabia, the United Arab Emirates, the United Kingdom of Great Britain and Northern Ireland, the United States of America and Yemen. Two experts of the Panel participated in the visit by the Chair of the Security Council Committee established pursuant to resolution [2140 \(2014\)](#) to the Islamic Republic of Iran, Jordan, Oman and Saudi Arabia between 30 March and 5 April 2019.
4. In Yemen, the Panel conducted two visits to Aden in April and June 2019. Further visits by the Panel to Yemen in September and November were cancelled by the United Nations for security reasons. In addition, two members of the Panel were unable to visit Aden in June 2019 owing to internal logistical and capacity constraints of the United Nations. The United Nations Humanitarian Air Service has denied the Panel access to its aircraft since June, which has restricted the Panel's ability to travel to Yemen.
5. In Aden, the Panel held meetings with officials of the Government of Yemen, members of civil society and the southern transitional council and other southern groups. In June, two members of the Panel visited Turbah, where it met with the military, the police, intelligence officers and local authorities from Ta'izz.
6. The Panel is still unable to travel to Houthi-controlled areas of Yemen, despite two official communications sent to the Sana'a-based ministry of foreign affairs.<sup>2</sup> The Houthis did not respond to any official communication from the Panel during the reporting period.
7. The Panel conducted six visits to Saudi Arabia and two visits to the United Arab Emirates for meetings and arms inspections. Inspections in Aden in June and September 2019 did not materialize (see para. 4). To address potential concerns over the chain of custody, the Panel needs to inspect arms captured on the battlefield or seized in transit as close in time to the point of capture or seizure as possible. Owing to United Nations security considerations, most of the inspections have been conducted in locations outside Yemen. The Panel notes that, despite numerous requests to Saudi Arabia, it has been unable to conduct inspections of specific items, such as flight recorders or guidance systems, that are significant to ongoing investigations.

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<sup>1</sup> See annex 1 for information on the methodology used and the opportunity to reply.

<sup>2</sup> In order to avoid confusion between the ministries and officials of the Government of Yemen and Houthi authorities and appointees, and to easily distinguish between the two, the Panel will use capitalization for the ministries and officials of the Government of Yemen and lower case for Houthi authorities and appointees.

8. The Panel had sent 143 official letters as at 31 December 2019, of which 103 were sent to 28 Member States and 40 were sent to 28 entities, companies and individuals and to which 57 replies were still pending as at 27 January 2020 (see annex 3).

## II. Challenges to the peace, security and stability of Yemen

### A. Web of conflicts in Yemen

9. The problems facing Yemen do not exist in isolation; the country's many conflicts are interconnected and cannot be separated by clear divisions between external and internal actors and events. The cumulative impact of these conflicts in Yemen through 2019 was to severely diminish the already tenuous level of control exercised by the President of Yemen, Abdrabuh Mansour Hadi. In contrast to the instability in the south, the Houthis have continued to consolidate their control, maintain their economy and present a unified military force.

10. Many armed groups are trying to achieve two primary objectives: a monopoly over armed violence within the territory under their control and control over revenue streams. Within that context, the people of Yemen struggle to survive in a greatly diminished economy. The range of political and military challenges to the peace, security and stability of Yemen are listed in table 1 below.

Table 1  
Changing nature of challenges in 2019

<i>Challenge</i>	<i>Description</i>	<i>International links</i>	<i>Changes in 2019</i>
Houthis fighting the Government of Yemen	Active fronts include Hudaydah, Ta'izz, Bayda', Ma'rib and Jawf. The conflict has had a significant impact on populations.	The Government of Yemen is supported by the Coalition to Support Legitimacy in Yemen.	No significant changes
Houthis fighting the West Coast Forces, the Security Belt Forces and elements of southern resistance	Confined to Ad Dali' and the Red Sea littoral. The impact on civilians was considerable.	The United Arab Emirates backs the West Coast Forces and the Security Belt Forces.	The United Arab Emirates has mostly withdrawn from the west coast, but support for the West Coast Forces remains. Before 1 August, the Security Belt Forces were affiliated with the United Arab Emirates. After 7 August, they affiliated themselves with the southern transitional council.
Houthis fighting the Coalition	There are two fronts: the land war on the border between Saudi Arabia and Yemen and the air war involving Coalition air strikes and Houthi attacks on Saudi Arabia. The	Saudi Arabia is supported by a global supply chain. Despite the targeted arms embargo, the Houthis also retain access to global supply chains.	Houthis launched strikes on economic targets within Saudi Arabia at ranges of 1,000 km, meaning that the Houthis potentially also have the capacity to strike targets in the United Arab Emirates.

<i>Challenge</i>	<i>Description</i>	<i>International links</i>	<i>Changes in 2019</i>
	impact of the Coalition air strikes on civilian populations has been considerable. Houthi strikes into Saudi Arabia have also affected civilians.		A partial ceasefire between the Houthis and Saudi Arabia was proposed in September, with inconsistent results. Both sides are now engaged in discussions.
Houthis fighting tribal dissent in Hajjah, Amran and Ibb	The fighting has been sporadic since 2018. Tribal dissent was harshly suppressed, with a significant impact on civilians.	The Coalition delivered supplies, including weapons, to the tribes of Hajour in Hajjah.	Reported tribal dissent in Houthi-controlled areas increased, despite brutal repression.
Security Belt Forces and Shabwani Elite Forces affiliated with the southern transitional council clashing with the Government of Yemen	Following the brief clashes in Aden in 2018 <sup>a</sup> and in Ataq in June 2019, major clashes occurred around 7–29 August between Government of Yemen forces and forces affiliated with the southern transitional council in Aden, Abyan and Shabwah.	The Security Belt Forces and Shabwani Elite Forces are affiliated with and receive the bulk of their funding, arms and training from the United Arab Emirates. The southern transitional council has also received political and military support from the United Arab Emirates.	By 10 August, the forces affiliated with the southern transitional council had removed the Government of Yemen forces and most political officials from Aden and Abyan. In the interim, the Government of Yemen had called for the United Arab Emirates to stop supporting these groups. On 5 November, talks sponsored by Saudi Arabia resulted in the Riyadh Agreement. The situation remains volatile.
Air strikes by the United Arab Emirates on Government of Yemen forces	On 29 August, the United Arab Emirates launched air strikes on an advancing Government of Yemen column at the Alam checkpoint in Aden and in Dhofas in Abyan.	United Arab Emirates	This is the first and only acknowledged attack by the United Arab Emirates that impacted on Government of Yemen forces.
The Thirty-fifth Brigade and the Abu al-Abbas armed group fighting other Government of Yemen forces in Ta'izz	After a period of relative calm that followed a security campaign in March, and immediately following events in Aden in August, significant clashes erupted between these forces over control of the Ta'izz-Aden road.	Abu al-Abbas' group, and to a lesser extent the Thirty-fifth Brigade, received support from the United Arab Emirates.	After the intervention by the Government of Yemen, stability was restored; however, on 2 December, the commander of the Thirty-fifth Brigade was assassinated. Tensions remain.
Ongoing antiterrorism operations against Al-Qaida in the Arabian Peninsula and Islamic State in Iraq and the Levant (ISIL)	Al-Qaida in the Arabian Peninsula and ISIL have failed to demonstrate that they are a significant threat to Yemen. Counter-	Counter-terrorism operations are supported by Saudi Arabia, the United Arab Emirates and the United States.	Officially, there has been a decrease in uncrewed aerial vehicle strikes on terrorist targets, while at least five leaders of Al-

<i>Challenge</i>	<i>Description</i>	<i>International links</i>	<i>Changes in 2019</i>
	terrorism forces include the Shabwani Elite Forces, the Security Belt Forces, the Hadramawt Elite Forces and, to a lesser extent, the Government of Yemen forces. Houthis also claim to fight terrorism, yet have conducted prisoner swaps with Al-Qaida in the Arabian Peninsula.		Qaida in the Arabian Peninsula and ISIL have been arrested. <sup>b</sup>
Clashes between Al-Qaida in the Arabian Peninsula and ISIL	Mostly limited to Qayfah in Bayda'	Not known	Sporadic local clashes continued
Confrontations generated by attempts to control cross-border trade in Mahrah	The clampdown on smuggling, led by the forces affiliated with Saudi Arabia, produced a reaction from tribal elements near the border. The direct impact of these operations was small, but the potential benefit of preventing smuggling along the border with Oman is large.	Saudi Arabian forces are present in Mahrah.	Although tensions persist, violent confrontations had ended by June 2019.
The level of support to the Houthis from the Islamic Republic of Iran	Houthis receive political and military support from the Islamic Republic of Iran; however, the scale of such support is unknown.	The Panel has identified a potential line of financial support to Houthis from the Islamic Republic of Iran and indications of potential breaches of the arms embargo.	Political support has incrementally increased.
Apparent correlation between the conflict in Yemen and incidents affecting Saudi Arabia and the United Arab Emirates	Attacks on oil-related infrastructure in the region both on land and at sea	Saudi Arabia, the Islamic Republic of Iran and a number of oil tankers	Since mid-September, Houthi attacks by uncrewed aerial vehicles and land attack cruise missiles on Saudi Arabia have subsided.

<sup>a</sup> See Office for the Coordination of Humanitarian Affairs, "Yemen: escalation of armed clashes in Aden", flash update, 29 January 2018.

<sup>b</sup> See [www.newamerica.org/international-security/blog/centcom-no-yemen-military-strikes-september-2019/](http://www.newamerica.org/international-security/blog/centcom-no-yemen-military-strikes-september-2019/). The total number of strikes reported by the United States Department of Defense in 2018 was 36; in 2019, the Department reported 8 strikes up to the first week of October.

## **B. Houthis fighting the Government of Yemen**

11. With the exception of the major push by forces affiliated with the Coalition to Support Legitimacy in Yemen towards Hudaydah in late 2018, the territory held by the Houthis has not significantly changed. In 2019, front lines remained static while the Houthis focused most of their military efforts towards Saudi Arabia. The Coalition

continued to support the Government of Yemen in the fight against the Houthis, with the declared objective of restoring the Government of Yemen to power. However, the Coalition has failed to achieve this objective and has, on occasion, undermined the Government of Yemen (see para. 34). Overall, Coalition support to regular forces of the Government of Yemen has been inadequate, leading to an incapacity of the Government to conduct significant military operations.

12. While the military capacity of the Government of Yemen continues to deteriorate, the Houthis have solidified control over their forces and the northern tribes (see para. 20). The Houthis present a unified fighting force, capable of brutally suppressing dissent. The Houthis' significant authority is in part due to their well-established intelligence structures, which include the preventative security, a security and intelligence bureau and the *zainabiyat*, which are described below.

### 1. Preventative security

13. The preventative security is the most influential intelligence apparatus in Houthi-controlled areas. It came into prominence after the death of Ali Abdullah Saleh (YEi.003). It operates outside "State" structures and reports to Abdulmalik al-Houthi (YEi.004). Its leader is one of the most powerful Houthi figures. More information is provided in confidential annex 4.

14. The focus of the preventative security is to monitor the Houthi movement and protect it from infiltration. Other responsibilities include reviewing reports from Houthi supervisors;<sup>3</sup> ensuring that fighters do not flee or take weapons from the front lines; intervening in clashes among Houthi fighters; and arresting and detaining Houthi officials who engage in subversive acts. The Panel interviewed one woman who was deprived of her liberty and sexually harassed by an officer identified as belonging to the preventative security for protesting against the Houthis.

### 2. Security and intelligence bureau

15. In August 2019, in the largest reorganization of intelligence agencies since the Houthis took control of Sana'a, the national security bureau and the political security office were merged into the new security and intelligence bureau.<sup>4</sup> The function of the bureau is to look outside the Houthi movement for potential threats.

16. This reorganization led to the dissolution of the two significant Ali Abdullah Saleh-era networks mentioned above and the purging of some intelligence officials. The Panel has received reports of several arrests of national security bureau officials.<sup>5</sup> Motlaq Amer al-Marrani (also known as Abu Emad), who was the deputy head of the national security bureau, is of interest to the Panel for his involvement in obstructions of the delivery of humanitarian assistance (see also para. 89). Abdul Hakim al-Khaiwani, the former deputy minister of the interior, is the director of the security and intelligence bureau, and Abdul Qader al-Shami, the former head of the political security office, was appointed deputy director of the bureau.

<sup>3</sup> These are community-level supervisors, called the *musharafeen*, who used to work under the revolutionary committee led by Mohammed Ali al-Houthi. Officially, the revolutionary committee no longer exists, but there are indications that the committee continues to operate. Mohammed Ali al-Houthi was appointed as a member of the supreme political council on 30 July 2019.

<sup>4</sup> <https://almasdaronline.com/articles/171223>.

<sup>5</sup> Sources close to the Houthis. See also [www.alarabiya.net/ar/arab-and-world/yemen/2019/11/10/الحوثي-يعتقل-26-ضابطا-من-منتسبي-الامن-السياسي-في-صنعاء](http://www.alarabiya.net/ar/arab-and-world/yemen/2019/11/10/الحوثي-يعتقل-26-ضابطا-من-منتسبي-الامن-السياسي-في-صنعاء).

### 3. *Zainabiyat*

17. Mostly drawn from Hashemite families, the *zainabiyat* form an intelligence apparatus directed at women. The *zainabiyat's* responsibilities include searching women and houses, indoctrinating women and maintaining order in female prisons. The Panel has documented violations committed by *zainabiyat*, including the arbitrary arrest and detention of women, looting, sexual assault, beatings, torture and facilitating rape in secret detention centres (see annexes 5 and 6).<sup>6</sup>

18. During the reporting period, the Houthis continued to appoint long-standing affiliates to key military and civilian positions, including Abdul Karim Amir al-Din al-Houthi, uncle of Abdulmalik al-Houthi, as the minister of the interior. They also appointed Abdul Mohsen Abdullah Qasim Attawoos, first as the head of the national authority for the management and coordination of humanitarian affairs and disaster recovery and then as the secretary-general for the supreme council for the administration and coordination of humanitarian affairs and international cooperation. Attawoos was a general supervisor in Dhamar and has been a notable member of the movement since 2004. Other high-level appointments are provided in annex 7.

## C. Suppression of dissent by the Houthis

19. One of the primary reasons that the Houthis remain unified is their suppression of dissent within Houthi-controlled areas. In 2019, this included dissent from tribes and politically active women.

### 1. Suppression of tribal dissent

20. Between January and March 2019, the Houthis clashed with some tribes of Hajour, in Hajjah, resulting in the use of heavy weaponry in civilian areas, the destruction of houses, heavy casualties for the tribes and detentions.<sup>7</sup> During the battle, the Coalition provided weapons and supplies to the tribes<sup>8</sup> and assisted with air strikes.<sup>9</sup> Following a two-month siege, the Houthis prevailed over the tribes on 10 March 2019. The following days saw the massive displacement of civilians, widespread detentions and some extrajudicial killings. The clashes represented the most significant incident of opposition to the Houthis in 2019 within territories under their control. There were also other reported clashes and killings of tribal leaders in Amran<sup>10</sup> and Ibb.<sup>11</sup>

### 2. Repression of women

21. In Houthi-controlled territory, women are targeted both directly and indirectly when they are, or are perceived to be, a threat to Houthi rule. The Panel has

<sup>6</sup> Interviews with civil society activists and 10 women, all of whom had interacted with the *zainabiyat*.

<sup>7</sup> Based on discussions with affected tribal leaders and local civil society documenting violations. See also a letter dated 8 March 2019 from the Permanent Representative of Yemen to the United Nations addressed to the President of the Security Council (S/2019/220) and a statement from the Office of the Resident and Humanitarian Coordinator in Yemen, available at [https://reliefweb.int/sites/reliefweb.int/files/resources/HC\\_Statement\\_Hajjah\\_11\\_March\\_2019.pdf](https://reliefweb.int/sites/reliefweb.int/files/resources/HC_Statement_Hajjah_11_March_2019.pdf).

<sup>8</sup> <http://en.adenpress.news/news/2593>, confirmed by tribal leaders.

<sup>9</sup> One such air strike hit a civilian house. The Houthi forces had parked a tank next to the house, despite objections by locals because of the potential for an air strike.

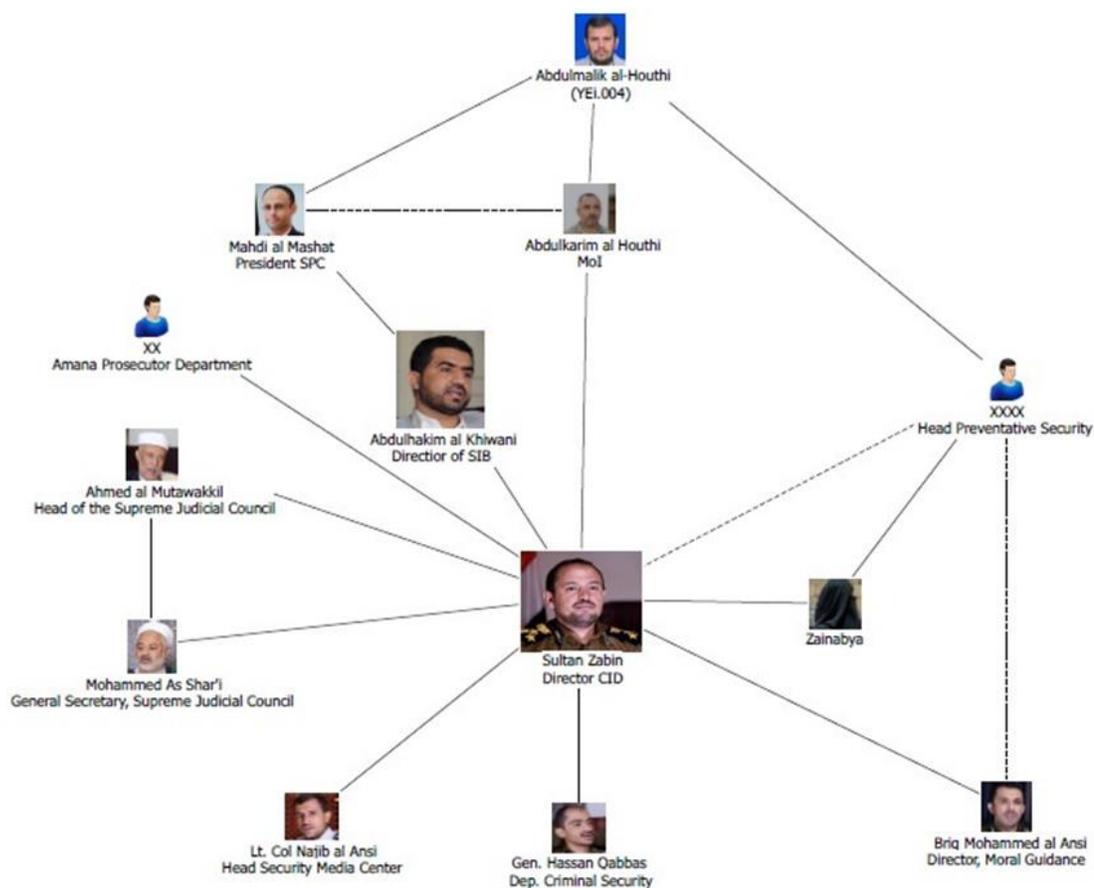
<sup>10</sup> Panel sources in Amran. See also [www.thenational.ae/world/mena/yemen-government-condemns-houthi-killing-of-tribal-leader-1.889829](http://www.thenational.ae/world/mena/yemen-government-condemns-houthi-killing-of-tribal-leader-1.889829) and <https://apnews.com/3a0b4252b08b4ba8b0531e1eb13f26c2>.

<sup>11</sup> Panel sources in Oud, Ibb. See also [www.alarabiya.net/ar/arab-and-world/yemen/2019/06/24-اليمن-مقتل-وكيل-محافظة-اب-في-اشتبكات-حوثية-داخلية-06/24](http://www.alarabiya.net/ar/arab-and-world/yemen/2019/06/24-اليمن-مقتل-وكيل-محافظة-اب-في-اشتبكات-حوثية-داخلية-06/24).

documented a growing pattern of the repression of women. In a total of 11 cases documented by the Panel, women were arrested, detained, beaten, tortured and/or sexually abused because of their political affiliations or participation in political activities or public protests. These women were threatened with charges of prostitution or organized crime if they persisted in activities against the Houthis (see annex 5). As described in several Security Council resolutions, including resolution [2467 \(2019\)](#), the increased repression of women expressing political views or taking part in demonstrations affects their capacity to take part in efforts and decision-making processes related to the resolution of conflict.

22. The Panel is investigating the involvement of the director of the criminal investigation department in Sana'a, Sultan Zabin, in relation to the torture of a female political activist in an identified location.<sup>12</sup> The Panel has identified an extensive network involved in political repression under the guise of curbing prostitution (see figure I). The Panel is also investigating the involvement of Abdul Hakim al-Khaiwani, who has publicly stressed the strong relationship between the ministry of the interior, the prosecution and legal authorities in carrying out these arrests and detentions (see annex 5).

Figure I  
**Identified affiliations of Sultan Zabin**



Source: Panel.

<sup>12</sup> Documentary evidence of torture and testimonies. The Panel also received documents that demonstrate that Sultan Zabin and/or his office engaged in the arrest, detention and enforced disappearances of other women. See confidential annex 6.

23. The Panel finds that the brutal suppression of tribal and political dissent may represent a threat to the peace, security and stability of Yemen, and those who engage in repressive activities may meet the designation criteria.

## **D. Changes to the military posture in areas under the control of the Government of Yemen and/or the Coalition to Support Legitimacy in Yemen**

### **1. Redeployment of United Arab Emirates troops from Yemen**

24. During 2019, the United Arab Emirates greatly reduced its troop presence in a redeployment that occurred in two phases. The first phase involved a major drawdown in June and July from a few thousand to a few hundred troops, but some troops remained in place to support the armed groups that the country had trained and equipped between 2015 and 2019 (see table 2). The second occurred in the first week of October, leaving a minimum presence of United Arab Emirates troops in Mukha, Aden, Balhaf, Riyan and Socotra.<sup>13</sup> This occurred alongside the significant reduction of Sudanese troops shortly after the establishment of the new regime in Khartoum.<sup>14</sup> The withdrawal of the United Arab Emirates from Aden was completed with the handover of its base in Burayqah to Saudi Arabian forces following the signing of the Riyadh Agreement in November 2019.

### **2. Changes to the West Coast Forces, the Security Belt Forces and other forces**

25. The Panel considers the West Coast Forces,<sup>15</sup> the Security Belt Forces, the Hadramawt Elite Forces and the Shabwani Elite Forces to be non-State armed groups. The Government of Yemen stated that the Security Belt Forces, the Shabwani Elite Forces and the Hadramawt Elite Forces had not been under its command and control since their formation.<sup>16</sup> Table 2 shows their affiliations before the redeployment of the United Arab Emirates troops in June 2019.

26. The Panel notes the presence of Yemeni fighters on both sides of the border between Saudi Arabia and Yemen fighting under Saudi Arabian command but with different statuses depending on their location.<sup>17</sup>

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<sup>13</sup> Panel sources.

<sup>14</sup> See [www.reuters.com/article/us-sudan-politics/sudan-says-it-has-reduced-troops-in-yemen-to-5000-idUSKBN1YC0H4](https://www.reuters.com/article/us-sudan-politics/sudan-says-it-has-reduced-troops-in-yemen-to-5000-idUSKBN1YC0H4).

<sup>15</sup> The exception is the Transport Brigade led by Amjad Khalid, which is affiliated with the Presidential Protection Brigades of the Government of Yemen.

<sup>16</sup> Meeting with the Government of Yemen in Riyadh, September 2019, and letter dated 4 October 2019 from the Government of Yemen.

<sup>17</sup> Some fighters affiliated with the Government of Yemen were considered as falling under the Ministry of Defence of the Government of Yemen, in which case their military units were considered as State actors. Those crossing into Saudi Arabia seemed to be treated as contractors.

Table 2  
**Type of support and level of control by the United Arab Emirates and the Government of Yemen before 1 June 2019 (for supporting evidence, see annex 8)**

<i>Groups</i>	<i>Characteristics</i>
Security Belt Forces	Non-State actor, located in Aden, Lahij, Abyan and Ad Dali'  Modus operandi with the United Arab Emirates: The United Arab Emirates formed the Forces, selected the commanders, recruited and trained the troops, paid salaries and provided weapons, equipment and logistics. The Forces worked with the United Arab Emirates on joint operations and took specific orders and instructions from United Arab Emirates troops.
Shabwani Elite Forces	Non-State actor, located in Shabwah  Modus operandi with the United Arab Emirates: as above
Hadramawt Elite Forces	Non-State actor, located in Hadramawt  Modus operandi with the United Arab Emirates: as above
West Coast Forces (except Amjad Khalid forces)	Non-State actor, located in Mukha and Hudaydah  Modus operandi with the United Arab Emirates: as above, but the Forces were formed by both the United Arab Emirates and the Government of Yemen; the United Arab Emirates held complete operational control during operations on the west coast.
Abu al-Abbass group	State actor, located in Ta'izz  Modus operandi with the United Arab Emirates: the United Arab Emirates provided only weapons, equipment and logistics. The Government of Yemen provided salaries in 2019, and the group ran joint operations with Government of Yemen troops.

*Source:* Panel.

27. The forces in table 2 underwent changes between June and November 2019, notably, the Security Belt Forces in Aden affiliated themselves with the southern transitional council in August (see para. 30). In addition, the Shabwani Elite Forces fragmented (see para. 32). The current level of control directly exerted by the United Arab Emirates on commanders of the Shabwani Elite Forces and the Security Belt Forces is currently unclear, but the United Arab Emirates is still in a position to exert a minimum level of command through the southern transitional council. Tensions between the Shabwani Elite Forces and the Government of Yemen forces in Shabwah and Abyan persisted into December 2019.

28. Around 9 June 2019, the leaders of the West Coast Forces came together in a joint force command structure comprising around 11 senior commanders, including from the Amaliqah Brigades, Tihamah Brigades, the Guards of the Republic and the Haytham Qasem Brigade (see annex 9). It remains to be seen whether this will ensure closer coordination between forces that had previously required oversight by the United Arab Emirates to be effective. Divisions between the various groups persist. The West Coast Forces affiliated with the United Arab Emirates largely refrained from

participating in the conflict in the south.<sup>18</sup> In November, there were discussions in Riyadh to incorporate some West Coast Forces as Government of Yemen units.<sup>19</sup>

### 3. Clashes between the Government of Yemen and forces affiliated with the southern transitional council

29. On 1 August 2019, Brigadier General Munair al-Yafae, also known as “Abu Yamama” was killed following an explosion at Jala’ camp in Burayqah. The Houthis claimed to have conducted the attack, stating that they used a combination of an uncrewed aerial vehicle and a missile; however, the Panel has been unable to note any indication of either weapon. On 7 August 2019, after a shooting and the reported killing of three people who attended the funeral of Abu Yamama, the vice-president of the southern transitional council, Hani Ali Salem Binbrek, publicly called for the presidential palace to be stormed.<sup>20</sup> The Panel finds that Binbrek, using his authority as the vice-president of the council, mobilized armed groups, including Security Belt Forces, and used force to take actions that undermined the control and authority of the Government of Yemen in Aden and Abyan.

30. After years of weakening of the Government of Yemen forces (see S/2018/594 and S/2019/83), on 10 August 2019, the southern transitional council declared complete control over Aden following four days of clashes.<sup>21</sup> The Government of Yemen forces, including the Presidential Protection Brigades in Aden, were defeated, expelling what little remained of President Hadi’s authority in Aden. The Security Belt Forces, which, according to the Government of Yemen, were under its operational control even in June 2019,<sup>22</sup> affiliated themselves with the southern transitional council on 7 August 2019 (see annex 8).

31. The southern transitional council’s territorial and military conquest continued into parts of Abyan and Lahij – areas where regional Security Belt Forces already had significant presence and control – forcing the Government of Yemen forces to surrender. The advance by the council was halted in Shabwah in the third week of August 2019 (see para. 33). The fighting in Aden and Ataq demonstrated that, despite the claimed strength of both forces, neither force had the capacity to sustain an extended military operation.

32. There were three turning points in the conflict between the southern transitional council and the Government of Yemen that had wider implications: the first was the confrontations in Shabwah, which were as significant as those in Aden. Groups affiliated with the council succumbed to the regular forces,<sup>23</sup> in large part because of the fragmentation of the Shabwani Elite Forces. The Third and Sixth Brigades of the Shabwani Elite Forces decided not to fight, following their tribal decisions (see annex 9). This decision harmed the council more than the Government of Yemen.

33. Serious military confrontations had also occurred in Shabwah between the Shabwani Elite Forces and the Government of Yemen forces in June 2019, which were possibly a precursor to the events in Aden and which may have strengthened the tribes’ resolve to prevent a repetition (see annex 10). Another possible reason for the rejection by the tribes was their refusal to allow external interference in their territorial hold on the oil-producing and oil-transport areas. The battle of Shabwah

<sup>18</sup> Some Amaliqah Brigades left the west coast for Abyan in October 2019. Confirmed by West Coast Forces. See also <http://en.adenpress.news/news/13462>.

<sup>19</sup> Individuals that participated in the discussions and Government of Yemen sources.

<sup>20</sup> Extract of television statement on file with the Panel. See also [www.stcaden.com/news/10094](http://www.stcaden.com/news/10094).

<sup>21</sup> There continued to be pockets of resistance by Government of Yemen forces.

<sup>22</sup> Panel meeting with government officials in Aden, October 2018.

<sup>23</sup> The Shabwani regular forces had reinforcements from other areas under the control of the Government of Yemen and/or the Coalition.

demonstrated that armed groups in the areas under the control of the Government of Yemen and/or the Coalition might have had allegiances primarily based on the availability of economic resources rather than secessionist aspirations or external financial support.

34. The second turning point was on 28 and 29 August 2019, when the United Arab Emirates launched air strikes on military units of the Government of Yemen preparing to take back control over Aden. The air strikes prevented the Government of Yemen troops from entering Aden and created a military advantage for the southern transitional council, and subsequently, the council regained control of Abyan.<sup>24</sup>

35. The third turning point was the signing of the Riyadh Agreement. The Agreement further eroded the authority of the Government of Yemen over its forces, as the Coalition command now exercises direct supervision over military decisions. Unlike the annex on security arrangements, which provides the Ministry of the Interior with the autonomous authority to oversee the security forces, the annex on military arrangements severely limits and undermines the authority and control of the Government of Yemen over the reorganization of its forces and their weapons. It remains to be seen if decisions in that regard will be taken in consultation with the Government of Yemen.

36. There is also a risk that elements of the regular forces will resist the incorporation of former opponents into their military units, as envisaged in the Agreement, for example in Shabwah, where the Government of Yemen forces emerged victorious.<sup>25</sup> There are inherent tensions between the desire of the Government of Yemen and Saudi Arabia to create a consolidated force that works under a unified military command and the reality that the armed groups affiliated with the southern transitional council will retain their tribal identities and community interests.

#### **4. Fighting in Ta‘izz**

37. Following the events in Aden in August, a series of serious clashes occurred among the Government of Yemen forces in Ta‘izz, including fighting between the Thirty-fifth Brigade and Abu al-Abbas’ forces on one side and the Fourth Mountain Infantry Brigade supported by the Al-Hashd al-Sha‘bi armed group (affiliated with Al-Islah) on the other side. These events reflected the fragmentation within the armed forces of the Government of Yemen and the challenges faced by the Government of Yemen in controlling its forces (see annexes 11 and 12).<sup>26</sup>

### **E. Ongoing antiterrorism operations against Al-Qaida in the Arabian Peninsula and Islamic State in Iraq and the Levant**

38. Throughout 2019, Al-Qaida in the Arabian Peninsula and Islamic State in Iraq and the Levant (ISIL) struggled to gain a foothold while continuing to compete and battle for territorial control and recruitment, for example, in Bayda’. The significance of the use of the label “Al-Qaida in the Arabian Peninsula” appears to be either to justify attacks on an opponent or to gain support from counter-terrorism operations (see table 1).

<sup>24</sup> The Panel requested the Government of Yemen and the United Arab Emirates to provide information on these air strikes that would enable an independent verification of their claims, but neither party provided such information.

<sup>25</sup> Confidential Shabwani official sources.

<sup>26</sup> On 2 December 2019, the commander of the Thirty-fifth Brigade, Adnan Hamadi, was killed in Ta‘izz.

39. Some tribal leaders from Bayda' informed the Panel that they occasionally associated themselves with Al-Qaida in the Arabian Peninsula but that they were only doing so to protect their territories against the Houthis, in the absence of support by the Government of Yemen.<sup>27</sup> Communities in two rural districts within Bayda' that received some military support from the Government of Yemen stated that they maintained an uneasy defensive position with insufficient weapons against both the Houthis and Al-Qaida in the Arabian Peninsula and ISIL.

40. Al-Qaida in the Arabian Peninsula makes efforts to engage with host communities, including by identifying with the causes of their opponents. In a letter issued in Bayda', for example, Al-Qaida in the Arabian Peninsula, in an attempt to gain support, described alleged violations committed by forces affiliated with the United Arab Emirates against tribes and warned that Bayda' tribes might also suffer the same fate. By contrast, ISIL is identified by some tribes as more oppressive than the Houthis or Al-Qaida in the Arabian Peninsula.

41. There has been pushback against Al-Qaida in the Arabian Peninsula and ISIL, as shown in table 3. However, in September 2019, the Houthis engaged in prisoner exchanges with Al-Qaida in the Arabian Peninsula in Bayda'.<sup>28</sup> After the affiliation of the Security Belt Forces and some Shabwani Elite Forces with the southern transitional council, these forces are possibly more focused on solidifying their territorial control than fighting terrorism.

Table 3  
**Al-Qaida in the Arabian Peninsula and ISIL leaders arrested in 2019**

<i>Name</i>	<i>Title</i>	<i>Location of arrest</i>	<i>Arresting entity</i>	<i>Date of arrest</i>
Bialal Muhammad Ali al-Wafi (Abu al-Walid) <sup>a</sup>	Leader of ISIL in Ta'izz	Jebel Habshi, Ta'izz	Special Forces of the Seventeenth Infantry Brigade of Yemen	18 May 2019
Abu Osama al-Muhajir <sup>b</sup>	ISIL leader, Yemen	Mahrah	Saudi and Yemeni Special Forces	3 June 2019
Unidentified <sup>c</sup>	ISIL chief financial officer, Yemen	Mahrah	Saudi and Yemeni Special Forces	3 June 2019
Majid al-Sarari	Associate of Abu Abdullah al-Masri	Unknown	Houthis	Sana'a-based authorities confirmed arrest to Panel in June 2019
Hashem Mohsen Aiderous al-Hamed <sup>d</sup>	Al-Qaida in the Arabian Peninsula facilitator	Shabwah	Shabwani Elite Forces	17 August 2019; a known associate arrested with al-Hamed was released in December 2019

Source: Panel (see confidential annex 13 for individuals of Al-Qaida in the Arabian Peninsula and ISIL arrested in Ta'izz)

<sup>a</sup> <https://apnews.com/91fc48d39fed471a9ce0486482f54111>.

<sup>b</sup> <https://apnews.com/6fc370591b2046b08e6845899c80d643>.

<sup>c</sup> Media reports were confirmed by Government of Yemen intelligence sources and Saudi sources.

<sup>d</sup> According to the United States Treasury Department. Press release available at [www.treasury.gov/press-center/press-releases/Pages/sm0091.aspx](http://www.treasury.gov/press-center/press-releases/Pages/sm0091.aspx).

<sup>27</sup> Confidential sources.

<sup>28</sup> [www.xinhuanet.com/english/2019-09/18/c\\_138401577.htm](http://www.xinhuanet.com/english/2019-09/18/c_138401577.htm). The Panel received the names of the Al-Qaida in the Arabian Peninsula fighters who were exchanged.

## F. External links with the Houthis

### 1. Relationship between the Houthis and the Islamic Republic of Iran

42. The official Iranian position is that the country continues to support the implementation of a United Nations-brokered ceasefire, humanitarian assistance and the promotion of an intra-Yemeni peace dialogue.<sup>29</sup> In August 2018, the Houthis named Ibrahim Mohammed al-Dailami as the new ambassador of Yemen to the Islamic Republic of Iran. On 19 November 2019, the President of the Islamic Republic of Iran, Hassan Rouhani, formally received al-Dailami as the ambassador of Yemen, a move that supports the Houthis in establishing a formal international presence.<sup>30</sup> The Islamic Revolutionary Guard Corps recently stated that they only provided consultative and ideological support.<sup>31</sup> However, the information in paragraph 61 should also be noted.

### 2. Correlations between the conflict and increasing attacks in the region

43. The attack on oil tankers off Fujairah on the coast of the United Arab Emirates on 12 May led to heightened security concerns in the Gulf of Oman. Two days later, two pumping stations on the Saudi East-West pipeline were attacked by uncrewed aerial vehicles in an aerial attack claimed by the Houthis. There were subsequent attacks on tankers in the Persian Gulf on 13 June and another attack on oil facilities in Shaybah on 17 August. On that day, Abdulmalik al-Houthi claimed that the attack in Shaybah was a warning to the United Arab Emirates, noting that targets inside the United Arab Emirates were now within the range of Houthi uncrewed aerial vehicles. These events appeared to lead up to the coordinated attack by uncrewed aerial vehicles and land attack cruise missiles on oil sites in Abqaiq and Khurays on 14 September. Less than a week later, on 20 September, the president of the supreme political council, Mahdi al-Mashat, stated that the Houthis would cease launching missiles into Saudi Arabia if the Sana'a airport was reopened and Hudaydah had open access for shipping, while expressing support for the implementation of the Stockholm Agreement.<sup>32</sup>

## G. Riyadh Agreement

44. After the events in Aden in August, Saudi Arabia invited delegates of the southern transitional council and the Government of Yemen to Jeddah for talks. The United Arab Emirates encouraged the southern transitional council to engage in these talks.<sup>33</sup> As a result, the Riyadh Agreement was signed on 5 November 2019.

45. The Panel notes that both the Islamic Republic of Iran and the Houthis have rejected the Agreement, suggesting that it brings the Government of Yemen under the “trusteeship” of Saudi Arabia. The Agreement erodes the authority of the Government of Yemen over its regular forces, since Saudi Arabia now exercises direct supervision over military decisions that would otherwise be within the exclusive prerogative of the Government of Yemen (see paras. 35 and 36). The Panel notes that, while the signing of the Agreement is commendable in the context of preventing further escalation, the timelines in the Agreement have largely not been complied with.

<sup>29</sup> Panel meeting with Islamic Republic of Iran in New York, November 2019.

<sup>30</sup> <https://debrief.net/en/news-12795.html>.

<sup>31</sup> [www.tasnimnews.com/en/news/2017/11/24/1582883/iran-providing-yemen-with-advisory-assistance-irgc-commander](http://www.tasnimnews.com/en/news/2017/11/24/1582883/iran-providing-yemen-with-advisory-assistance-irgc-commander).

<sup>32</sup> [www.reuters.com/article/us-yemen-saudi/yemens-houthis-propose-to-saudi-arabia-that-both-sides-halt-missile-strikes-idUSKBN1W5261](http://www.reuters.com/article/us-yemen-saudi/yemens-houthis-propose-to-saudi-arabia-that-both-sides-halt-missile-strikes-idUSKBN1W5261) and <https://en.farsnews.com/newstext.aspx?nn=13980704000249>.

<sup>33</sup> Panel meeting with United Arab Emirates officials in Abu Dhabi, September 2019.

46. In addition to the rapprochement between the southern transitional council and the Government of Yemen, ongoing discussions have been held between the Houthis and Saudi Arabia. Through October and November, there was a significant reduction in Coalition air strikes on Yemen and there were no reported missile or uncrewed aerial vehicle attacks by the Houthis into Saudi Arabia. The Houthis released 290 prisoners on 30 September and the Saudis released 128 Houthi detainees on 28 November.<sup>34</sup> Also in November, the Deputy Minister of Defence for Saudi Arabia, Khalid Bin Salman, travelled to Muscat, reportedly to have direct or indirect talks with Houthi representatives.<sup>35</sup> As both Saudi Arabia and the Houthis are now publicly stating that they are engaged in discussions, there is the possibility for the two parties to build a path to peace.

## H. Fragile economy of Yemen

47. The strong economic relationship of Yemen with its neighbouring States is essential to the peace, security and stability of Yemen. A key factor of this relationship is migrant labour and remittances. Before the conflict, the total estimated remittance income was \$3.35 billion,<sup>36</sup> of which 90 per cent entered Yemen from the Gulf Cooperation Council. Of the total, 61.5 per cent came from Saudi Arabia. Remittance inflows are larger than aid inflows. The latter varies between \$2 billion to \$4 billion, and Gulf donors provide the majority of this sum.

48. Remittance inflows to Yemen are considered to have remained relatively stable, although the means of transferring the money are diverse. This diversity, along with the shift from banks and large money exchange companies to informal money transfer networks, makes the monitoring of remittances difficult.

49. The characteristics of migrant labour conditions are not simple. In recognition of the problems facing Yemenis, in April 2015, Saudi Arabian authorities granted an amnesty for undocumented Yemenis working in Saudi Arabia, giving them access to visas that could be renewed every six months. However, subsequent rises in annual charges for dependents and permits and sector-by-sector rulings on Saudization are having a significant negative impact on expatriates' remittances. Each regular migrant now pays annual fees of around \$2,500.<sup>37</sup>

## III. Arms and the implementation of the targeted arms embargo

50. Pursuant to paragraphs 14 to 17 of Security Council resolution 2216 (2015), the Panel focuses on a range of monitoring and investigative activities to identify violations of the targeted arms embargo involving the direct or indirect supply, sale or transfer to, or for the benefit of, individuals and entities designated by the Security Council Committee established pursuant to resolution 2140 (2014).

51. The Panel has inspected weapons and arms-related materials seized in Yemen. These included type 56-1 assault rifles, rocket-propelled grenade (RPG-7) launchers

<sup>34</sup> [www.icrc.org/en/document/yemen-290-detainees-were-released-facilitation-international-committee-red-cross-icrc](http://www.icrc.org/en/document/yemen-290-detainees-were-released-facilitation-international-committee-red-cross-icrc) and [www.icrc.org/en/document/128-detainees-repatriated-back-yemen-saudi-arabia](http://www.icrc.org/en/document/128-detainees-repatriated-back-yemen-saudi-arabia).

<sup>35</sup> <https://gulfnews.com/world/gulf/oman/khalid-bin-salman-meets-sultan-qaboos-in-oman-1.67778812>.

<sup>36</sup> <https://data.worldbank.org/indicator/BX.TRFPWKR.CD.DT?locations=YE>.

<sup>37</sup> Nearly half the Yemeni expatriates in Saudi Arabia earn less than \$530 a month, thus fees of around \$2,500 per year are a significant burden. See Yemen, Ministry of Planning and International Cooperation, "Yemen socio-economic update 2018", No. 32, February 2018. Available at [https://fscluster.org/sites/default/files/documents/yseu32\\_english\\_final.pdf](https://fscluster.org/sites/default/files/documents/yseu32_english_final.pdf).

and associated optical sights, which were seized by the Coalition on 10 December 2018 in Aden (see para. 61). It has also inspected a large shipment seized by the Coalition in late January 2019 in Jawf, which included a number of components for the manufacturing of Qasef- and Samad-family weaponized uncrewed aerial vehicles, which had been shipped to Oman prior to being found in Yemen. This confirms the Panel's analysis that the overland smuggling route through Jawf and south-east Yemen retains its significance. The Panel also inspected a shipment of servo actuators seized in Abu Dhabi while in transit to Sana'a in early November 2018, which might have been intended for the construction of uncrewed aerial vehicles and/or waterborne improvised explosive devices (see para. 63). The map in annex 18 provides an overview of Houthi supply networks for arms and related items documented by the Panel during the reporting period.

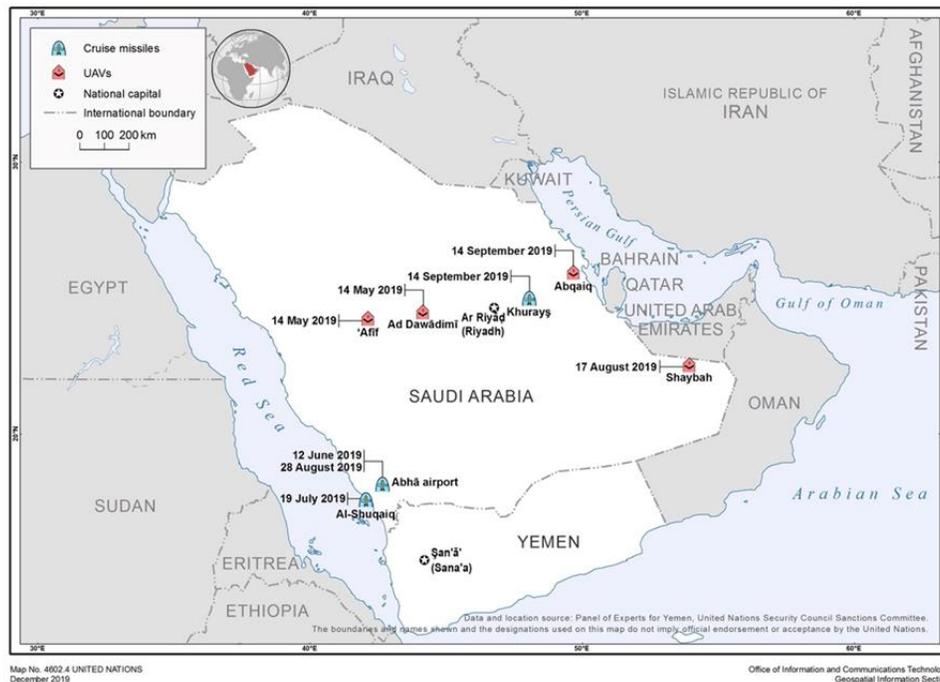
52. The Panel has noted reports in the media that the guided missile destroyer USS *Forrest Sherman* (DDG-98) seized a consignment of arms during a flag verification boarding of a stateless vessel in the Arabian Sea on 25 November 2019.<sup>38</sup> It has inspected the seized weapons and noted that the shipment included 21 anti-tank guided missiles, which were likely to be the Iranian Dehlabieh version of the 9M133 Kornet, two previously unknown surface-to-air missiles, and components for the Quds-1 land attack cruise missile, for a C802 anti-ship cruise missile and for a third, unidentified cruise missile. The shipment also included a large number of detonators, parts for the assembly of waterborne improvised explosive devices, thermal optical weapon sights and other components (see annex 20). The Panel has been informed that the vessel was a 12-m-long dhow with a Yemeni crew of 11 men, which was subsequently transferred to the Yemeni Coast Guard, and that the vessel was heading for the coast of Yemen. The Panel is investigating whether this shipment might be an attempted violation of the targeted arms embargo and has requested additional information, such as the coordinates of the seizure, the names of the vessel and its crew and access to GPS and satellite phone data, as well as an opportunity to interview the crew and the boarding party. A response is pending.

53. Houthi forces continue to project power beyond the battlefield in Yemen, using uncrewed aerial vehicles and land attack cruise missiles against targets in Saudi Arabia (see figure II). Two major trends have been visible throughout the reporting period. For attacks on targets near the southern border of Saudi Arabia, as well as for aerial attacks within Yemen, Houthi forces have mostly been relying on shorter-range uncrewed aerial vehicles, which the Panel believes are manufactured within Houthi-controlled territory. These attacks include the high-profile strike on the military parade at Anad air base on 10 January 2019, which killed at least 5 soldiers of the Government of Yemen and wounded at least another 20.<sup>39</sup> The attack was carried out using a Qasef-2K loitering munition. The second trend, since May 2019, has been the deployment of more sophisticated, longer-range uncrewed aerial vehicles and land attack cruise missiles, which have mostly been used to attack targets in Saudi Arabia. The Panel notes that these attacks coincided with an escalation of regional and geopolitical tensions over the Joint Comprehensive Plan of Action and seemed intended to force Saudi Arabia to adopt a more conciliatory approach towards the Houthis.

<sup>38</sup> [www.reuters.com/article/us-usa-iran-missiles-military-idUSKBN1Y82S1](http://www.reuters.com/article/us-usa-iran-missiles-military-idUSKBN1Y82S1).

<sup>39</sup> [www.aljazeera.com/news/2019/01/houthi-drone-attack-hits-military-base-yemen-reports-190110071518307.html](http://www.aljazeera.com/news/2019/01/houthi-drone-attack-hits-military-base-yemen-reports-190110071518307.html).

Figure II  
Confirmed aerial attacks on targets in Saudi Arabia since 14 May 2019



*Note:* The map does not include the numerous attacks using Qasef-2K shorter-range uncrewed aerial vehicles and Badr-1 rocket artillery on targets in the southern border region of Saudi Arabia, which include the lethal attack on Abha International Airport on 23 June 2019.

54. Houthi forces have claimed responsibility for attacks on targets up to 1,200 km away from their territory, such as the air strike on the Saudi Aramco plant in Abqaiq on 14 September 2019. The Panel doubts that the uncrewed aerial vehicles and land attack cruise missiles used in that attack had a sufficient range to have been launched from Yemeni territory under the control of the Houthis (see annex 14). Nevertheless, other attacks using the same weapons do seem to have been launched from Yemen. The Panel does not believe that those comparatively sophisticated weapons were developed and manufactured in Yemen, implying that they were imported in violation of the targeted arms embargo. The Panel is investigating the chain of custody of components in order to identify the manufacturers of both systems (see annexes 15 and 16). The higher effectiveness of those attacks also indicates that the use of such weapons poses a serious challenge for global arms control and anti-proliferation efforts as it highlights the vulnerability of critical infrastructure, despite being far from the front lines. The attacker only needs access to a modest industrial manufacturing base and high-tech components sourced from abroad, most of which are not classified as weapons or even dual-use items.

55. Unlike in previous years, there were no successful seaborne attacks attributed to Houthi forces and the number of attempted attacks by waterborne improvised explosive devices significantly decreased in 2019. The United Nations-brokered ceasefire for the port of Hudaydah, as well as the loss of other coastal bases to the Coalition, seems to have contributed to this reduction of attacks on civilian shipping.

## A. Uncrewed aerial vehicles

56. The Panel has observed two new, longer-range types of uncrewed aerial vehicles that have been used in attacks on targets in Saudi Arabia. The first is an extended-range version of the uncrewed aerial vehicle-X (UAV-X),<sup>40</sup> which features an additional fuel tank on the top of the fuselage, but otherwise is largely similar to the original version. This uncrewed aerial vehicle was used in the strikes on the oilfield in Shaybah on 17 August 2019, which, according to the Houthis, was carried out using 10 uncrewed aerial vehicles of this type in an operation dubbed “First operation economic deterrence”.<sup>41</sup> The oilfield sustained only limited damage and the significance of the attack seems to be the location of Shaybah, which is close to the border with the United Arab Emirates and more than 1,000 km away from Houthi-controlled territory. The Panel has inspected the debris of one of the uncrewed aerial vehicles used in this attack and has noted that it appears to be similar to the Samad-3 uncrewed aerial vehicle, which was displayed by Houthi-affiliated media on 7 July 2019 (see figure III).<sup>42</sup> On the basis of this designation, the Panel will refer to the UAV-X as the Samad uncrewed aerial vehicle.<sup>43</sup>

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<sup>40</sup> The UAV-X was first used by the Houthi forces against targets in Saudi Arabia and the United Arab Emirates in 2018 (see S/2019/83, para. 84 and annex 12).

<sup>41</sup> [https://english.almasirah.net/details.php?es\\_id=8322&cat\\_id=1](https://english.almasirah.net/details.php?es_id=8322&cat_id=1).

<sup>42</sup> [www.almasirah.net/](http://www.almasirah.net/).

<sup>43</sup> “Samad-1” allegedly refers to the designation of a reconnaissance version of the weaponized Samad-2/UAV-X.

Figure III  
**Samad-3 uncrewed aerial vehicle displayed by the Houthis (top) and the uncrewed aerial vehicle inspected by the Panel following the attacks in Shaybah (bottom)**



Sources: [www.almasirah.net/](http://www.almasirah.net/) (top), Panel (bottom).

57. The second new type of uncrewed aerial vehicle, which has so far not been displayed in the Houthi-affiliated media, is a Delta-design, with a wingspan of 215 cm and a length of 190–210 cm. The Panel has inspected the debris of numerous uncrewed aerial vehicles of this type in Saudi Arabia and has noted that the wing and fuselage construction consists of a carbon-fibre sandwich. Internally, it follows the standard design for uncrewed aerial vehicles of this type, that is, the nose cone contains the warhead, followed by the guidance system, the fuel tank or tanks and a rear-mounted Wankel engine in a pusher configuration. The overall quality of the manufacturing appears to be significantly better than other Houthi uncrewed aerial vehicles, such as the Qasef-2K and the Samad, which have a more “home-made” quality. Annex 15 provides a more detailed overview of the components of the uncrewed aerial vehicle. This hitherto unnamed type of uncrewed aerial vehicle has been used on two occasions in attacks on Saudi Arabia: on 14 May 2019 in strikes against two pumping stations, in Dawadimi and Afif, on the East-West oil pipeline (see figure IV), and during the high-profile attack on the Saudi Aramco plant in

Abqaiq on 14 September 2019. The latter operation was dubbed “Second operation economic deterrence” by a Houthi spokesman.<sup>44</sup> Annex 14 provides a detailed case study of that attack.

Figure IV

**Debris of the Delta-design uncrewed aerial vehicle used in the attack on Afif**



Source: Panel.

## **B. Land attack cruise missiles**

58. The Panel has inspected the debris of a new type of land attack cruise missile with a length of approximately 5.6 m and a diameter of 35 cm and made of carbon fibre, which is partially reinforced with metal and other materials. This weapon has been used in at least four different attacks on civilian targets in Saudi Arabia: two strikes on Abha International Airport on 12 June and 28 August 2019, the attack on the water-desalination plant in Shuqayq on 19 June 2019 and the attacks on the Saudi Aramco facilities on 14 September 2019. The Panel believes that the missiles are largely identical to the Quds-1 land attack cruise missile, which was first publicly displayed by the Houthi-affiliated media on 7 June 2019 (see figure V).<sup>45</sup> The Panel will therefore use this designation to refer to this type of missile.

<sup>44</sup> [https://english.almasirah.net/details.php?es\\_id=8774&cat\\_id=1](https://english.almasirah.net/details.php?es_id=8774&cat_id=1).

<sup>45</sup> [www.almasirah.net](http://www.almasirah.net).

Figure V  
**Quds-1 land attack cruise missile on display (top) and missile debris inspected in Saudi Arabia (bottom)**



Sources: [www.almasirah.net/](http://www.almasirah.net/) (top), Panel (bottom).

59. The Panel notes that the Quds-1 is based on a classic cruise missile design, with a cylindrical body, two fixed wings, three rear-mounted control surfaces and a nose cone, which contains the warhead. The primary engine is an unlicensed copy of the TJ-100 turbojet produced by PBS Velká Bíteš in Czechia,<sup>46</sup> which is externally mounted.<sup>47</sup> A solid-propellant rocket booster mounted at the rear with four fixed stabilizer fins provides additional thrust during the launch phase and then automatically detaches. The body of the missile consists of separate sections, which are marked with numbers, possibly to facilitate assembly.

60. Given the quality of the manufacturing, the Panel does not believe that the Quds-1 missile was developed and produced in Yemen. On the basis of the markings on some of the turbojet engines, which indicate a production date in 2019, as well as on the fact that the missiles had not been deployed prior to June 2019, the Panel believes that the missiles have been transferred to the Houthi forces in violation of the targeted arms embargo. Annex 16 provides an overview of the components documented among the missile debris. The Panel is tracing the chain of custody of those parts in order to identify the individual or entity that integrated them into the missile.

<sup>46</sup> See [www.pbs.cz](http://www.pbs.cz).

<sup>47</sup> The Houthi-affiliated media shows the engine mounted on top of the fuselage; however, there are some indications that the missile is displayed upside down, that is, that the turbojet is in reality mounted under the fuselage of the missile, similar to the Iranian Soumar and Ya Ali cruise missiles, of which it might be a derivative.

### C. Illicit trafficking in small arms and light weapons

61. The Panel continues to investigate the chain of custody, as well as the intended recipient, of the consignment of small arms and light weapons seized by Coalition forces on 10 December 2018 in Aden. According to the information received from the United Arab Emirates, the shipment consisted of 178 automatic rifles, 48 rocket-propelled grenade launchers and 45 optical sights for rocket-propelled grenade launchers. The Panel believes that the arms were either destined for armed groups under the control of listed individuals, which would constitute a violation of the targeted arms embargo, or for terrorist groups such as Al-Qaida in the Arabian Peninsula and ISIL, in which case the transfer would constitute a threat to the peace, security and stability of Yemen. So far, the Panel has been able to inspect only a sample of those weapons in Abu Dhabi (see annex 19), as two planned inspection visits to Aden were cancelled for reasons beyond the Panel's control. On the basis of the sample, the Panel has identified the rifles as having been produced in China in 2018,<sup>48</sup> while the rocket-propelled grenade launchers have technical characteristics similar to RPG-7 launchers manufactured in the Islamic Republic of Iran. The Panel has contacted China and the Islamic Republic of Iran requesting information on the chain of custody of those weapons. While a response from China is pending, the Islamic Republic of Iran has informed the Panel that the RPG-7 launchers do not conform to Iranian arms, but rather look like launchers produced in the "Eastern Bloc". With regard to the optical sights, the Panel has obtained evidence that the seven-digit serial numbers documented correspond to the numbers on PGO-7V3 semi-knocked-down kits that were produced in Belarus and exported in 2016 to Paya Pardaz Asia in Tehran with an end user certificate stating that they were destined for the Ministry of Defence and Armed Forces Logistics of the Islamic Republic of Iran. The transfer of the sights to Yemen may constitute a violation of the targeted arms embargo. The Panel contacted the Islamic Republic of Iran and was informed that sights with the serial numbers documented by the Panel have been distributed to different Iranian military units and are currently in use. The Panel continues to investigate the matter.

### D. Supply patterns for commercial civilian components used in Houthi uncrewed aerial vehicles

62. The Panel continues to believe that uncrewed aerial vehicles belonging to the Qasef and Samad families are manufactured inside Houthi-held territory using a mix of locally available materials (such as fibreglass for the fuselage and wings and explosives and ball bearings for the payload) and high-value components sourced from abroad. This theory is supported not only by the analysis of the debris of uncrewed aerial vehicles, but also by two recent seizures of uncrewed aerial vehicle components. Almost three tons of parts were seized in January 2019 in Jawf. The consignment included a number of DLE 110 and DLE 170 engines, which have been documented as part of Qasef and Samad uncrewed aerial vehicles, and exhausts, electronic ignition boxes, ailerons and a large quantity of propellers, as well as other equipment whose purpose remains undetermined.<sup>49</sup> On the basis of the presence of shipping labels, the Panel has been able to trace the consignment back to a company in Hong Kong, China, which exported it to an entity named Bahjat Alleqa'a with an

<sup>48</sup> The weapons have characteristics similar to the more than 2,500 assault rifles seized by the USS *Jason Dunham* (DDG-109) on 28 August 2018 from a skiff off the coast of Yemen (see [S/2019/83](#), paras. 95–97). The Panel had contacted China requesting information about the chain of custody for those weapons and was informed that "Chinese enterprises never sold them to Yemen".

<sup>49</sup> The Panel documented parts among the shipment that could be used to produce fuses for anti-personnel landmines.

address in Muscat. The shipment was picked up from Muscat International Airport on 2 December 2019 and reappeared in Jawf a month later, so it is likely that Bahjat Alleqa'a acted as an intermediary, facilitating the transfer. The Panel has requested Oman to provide more information on the identity of Bahjat Alleqa'a and/or of the individual who picked up the cargo at the airport, but has not received a reply.

63. The second case in which civilian technology presumably destined for the manufacture of weaponized uncrewed aerial vehicles or waterborne improvised explosive devices was seized involves the attempted export in early November 2018 of 60 SSPS-105 servo actuators.<sup>50</sup> They were exported from Japan to a consignee in Abu Dhabi under the name of Saleh Mohsen Saed Saleh, whose telephone number is known to be used by Al-Bairaq for international land transport, a company that provides transport services between the United Arab Emirates and Yemen.<sup>51</sup> The Panel has identified the importer in Yemen as Al-Swari Trading and Import Co., using an address and email also used by the Al-Swari Group for Rubber Manufacturing. An individual called Mohammed al-Swari seems to be associated with the two companies, as well as with a third company, Hashem Brothers for International Trading, which, according to its website, specializes in the supply of military equipment, including uncrewed aerial vehicle components.

64. These two cases, as well as that of the 3W-110i B2 uncrewed aerial vehicle engine that the Panel inspected among the debris of two early-model Samad uncrewed aerial vehicles in 2018 and that it traced back to a consignment exported in July 2015 from Germany through Greece and Turkey to Giti Reslan Kala, a logistics company, which was receiving the shipment on behalf of Tafe Gostar Atlas in Tehran (see S/2019/83, para. 87), illustrate this supply pattern (see annex 17 for more details on the three cases). Civilian components are exported by commercial manufacturers in industrialized countries through a network of intermediaries to Houthi-controlled territory, where they are integrated into uncrewed aerial vehicles and waterborne improvised explosive devices, which are then used in attacks on civilian targets. Given that the components themselves are not classified as arms or dual-use items, neither the manufacturers nor the customs authorities are usually aware that they are being used in Houthi weapon systems, which hampers the Panel's investigative efforts and assists the Houthi war efforts.

## IV. Economic context and overview of financing activities

65. In accordance with its mandate, the Panel continued to investigate the economic context in which listed individuals and their networks have continued to operate in violation of sanctions measures or have taken actions that could meet the designation criteria.

### A. Illicit revenue in areas controlled by the Houthis

66. As indicated in the previous report of the Panel (S/2019/83, paras. 100–102), the Houthis continued to collect customs rents in Hudaydah and Salif ports. They also continued to apply a second collection of customs revenues through A'far (Bayda'),

<sup>50</sup> It should be noted that the Panel has so far not been able to document any SSPS-105 servo actuators among the debris of uncrewed aerial vehicles used by the Houthi forces. However, the Panel has inspected servo actuators from the same manufacturer among the debris of a Shahed-123 uncrewed aerial vehicle, which crashed in Afghanistan in October 2016, as well as among the shipment seized in the Arabian Sea on 25 November 2019.

<sup>51</sup> See <https://transportation-service-2994.business.site/> and [www.seiyun.net/TransportOfficeAssets/albairagtransport\\_wm.jpg](http://www.seiyun.net/TransportOfficeAssets/albairagtransport_wm.jpg).

Dhamar (Amran) and Jabal Ra's (Hudaydah) on the main roads through which nearly all imports pass after arriving in Yemen from land-crossing points with Oman and Saudi Arabia and from Mukalla and Aden ports.

## 1. Houthi revenue from fuel imports

67. Fuel imports have consistently been presented as a primary source of Houthi revenues; however, the Panel notes that fuel imports through Hudaydah constitute only 5.5 per cent of Houthi tax collection, as estimated by the Panel in its report of January 2018.<sup>52</sup> The Houthi economic committee reported that customs and tax revenues from imports of fuel through Hudaydah amounted to 20,660,750,367 Yemeni rials (YER) over the period from August to October 2019.<sup>53</sup> The Panel used this figure and data from the United Nations Verification and Inspection Mechanism showing imports of 508,300 tons for the same period and 1,991,158 tons from January to November 2019, indicating an annual total of YER 22.5 billion for 2019.<sup>54</sup> This indicates that the tax on fuel imports does not represent a major source of revenue and thus should not be the main focus of discussions around Decree No. 49 (2019)<sup>55</sup> and the implementation of the Stockholm Agreement in relation to the payment of civil service salaries.

68. The implementation of Decrees No. 75 (2018)<sup>56</sup> and 49 (2019) has been used as a tool of economic warfare between the Government of Yemen and the Houthis, in particular from July to October 2019, with a negative impact on the civilian population. The Government of Yemen, through the Coalition, delayed a number of tankers in the Coalition holding area<sup>57</sup> for failure to present proof of payment of the cargo through banks or to pay customs tax in banks nominated by the Economic Committee of the Government. The Houthis responded by refusing the entry of tankers if the importers of the tankers complied with Decrees No. 75 or 49.

69. The Panel investigated the delays of the fuel tankers (see annex 21). The Panel received confirmation from the Government of Yemen and the Coalition that, from 13 August to 15 October, 11 tankers cleared by the United Nations Verification and Inspection Mechanism had been delayed by the Coalition for failure to comply with Decree No. 49.

## 2. External financing through fuel imports

70. As reported in paragraph 103 of its previous report (S/2019/83), the Panel continued to investigate cases of fuel imports funded by external sources, potentially creating revenues for Houthi elements acting on behalf of Abdulmalik al-Houthi.

71. The Panel gathered documents issued by the consignees (Matrix Oil, Yemen Elaf and Albarakah), indicating that four tankers had been loaded in Iranian ports while falsely stating that the fuel had been loaded in Oman. The details are provided in annex 22.

72. The shippers mentioned above paid a chartering fee of 21,095,922 United Arab Emirates dirhams (AED) (about \$5,743,200) in 19 instalments from 18 October 2016

<sup>52</sup> The Panel estimated that the Houthis were collecting a minimum of YER 407 billion (S/2018/594, para. 127).

<sup>53</sup> Statement issued on 11 November 2019, available at [www.saba.ye/ar/news3078500.htm](http://www.saba.ye/ar/news3078500.htm).

<sup>54</sup> The Panel estimates a monthly average tax collection of YER 7,357,648,200.

<sup>55</sup> Decree No. 49 is aimed at compelling importers to pay customs taxes to the Government of Yemen for goods imported through ports under Houthi control (Hudaydah and Salif).

<sup>56</sup> Decree No. 75 is aimed at curbing the financing of imports through money exchangers.

<sup>57</sup> An area around 140 nautical miles from Hudaydah (see annex 21, figure 21.1).

to 25 May 2017, using money exchangers and bank transfers from accounts in Oman.<sup>58</sup> The Panel shared this information in official letters sent to the Islamic Republic of Iran<sup>59</sup> and Oman<sup>60</sup> seeking evidence that could demonstrate that the fuel had not been donated but had instead been sold. The Islamic Republic of Iran replied that “it has neither sold any fuel destined for Yemen nor has it transferred any fuel into that country” and that “based on [its] technical analysis, the documents attached to [the Panel’s] letter are not authentic”. The Panel has not received a reply from Oman. The Panel continues to investigate to identify key actors in Oman behind these transactions.

## **B. Illicit financing**

73. The Panel is investigating financing relating to the illicit traffic in arms to and from Yemen whose revenues could be used for the benefit of listed individuals or to finance acts that threaten the peace and security of Yemen.

74. In paragraph 80 and annex 41 of a previous report (S/2018/193), the Panel provided information on a case concerning 8,000 Taurus pistols manufactured in Brazil that were purchased for the Ministry of Defence of Djibouti in 2014 and 2015, of which 5,000 arrived at Ambouli International Airport in Djibouti. The import was brokered by a Yemeni arms trafficker, Fares Mohammed Mana’a (listed as SOi.008 on the sanctions list established and maintained pursuant to Security Council resolution 751 (1992)), who was appointed as the governor of Sa’dah in late 2014 and, since 28 July 2016, has acted as a minister of state in Houthi-controlled Sana’a.

75. The Panel has observed on Telegram<sup>61</sup> several pictures of Taurus pistols advertised for sale by arms traffickers in Sana’a. The pictures show pistols with the serial numbers TGZ50281, TGZ51161 and TGZ51212 (see annex 23). The Panel has evidence that the first pistol was delivered to Djibouti on 17 March 2014.<sup>62</sup> The Panel is seeking confirmation of the chain of custody of the pistols and clarification pertaining to the timing of their transfer into Yemen and their potential sale for the benefit of the Houthis. The Panel has a copy of the purchase order of the 8,000 pistols with the name of the son of Mr. Mana’a, Adeeb Mana’a, and a company associated to them under the name of Itkhan with a fax number in Yemen. The Panel has evidence that Itkhan Corporation for General Trading and Hunting SARL, Trading Avenue, Djibouti, owned account 000010200451761 at the International Commercial Bank of Djibouti, which was used to make payments for the purchase of the weapons.

## **C. Diversion of public funds by officials associated with the Government of Yemen**

### **1. Revenues collected by officials of the Government of Yemen**

76. The Panel observed that revenues collected by the Governorates of Ma’rib, Mahrah and Hadramawt continue to be appropriated by officials without any effective control by the Central Bank of Yemen in Aden. The Panel received information from Yemeni officials alleging the illicit enrichment of local leaders through the diversion

<sup>58</sup> AED 9,546,852 from Al Bader Exchange in the United Arab Emirates, AED 3,169,980 from Abu Sumbol General Trading LLC in the United Arab Emirates and AED 7,486,091, in six instalments from February to April 2017, through a transfer from bank account 0500005126001001 in Oman; and AED 1,832,499 from a company under the name of Healthworld International LLC in Muscat (see [www.healthworld-international.com/](http://www.healthworld-international.com/)).

<sup>59</sup> Letter dated 29 October 2019.

<sup>60</sup> Letter dated 29 May 2019.

<sup>61</sup> <https://t.me/slah3568>.

<sup>62</sup> The Panel is seeking information on the other two pistols.

of funds collected from the sale of natural gas in Ma'rib and customs taxes in Mahrah ports and crossing points.

## 2. Profits from the manipulation of foreign exchange rates

77. The Panel has investigated allegations of corruption associated with foreign exchange transactions by the Central Bank of Yemen conducted in late 2018. This allegation was reinforced by the head of the Economic Committee of the Government of Yemen in his request to the Prime Minister to investigate the case<sup>63</sup> and was widely reported in local media, leading to the replacement of the Governor of the Central Bank of Yemen on 20 March 2019.<sup>64</sup> The Panel considers corruption to be a threat to peace and security, as recognized in the United Nations Convention against Corruption of 2003, which was ratified by Yemen on 7 November 2005. This potential corruption may have resulted in the illicit enrichment<sup>65</sup> of staff of the Central Bank of Yemen and officials of the Government of Yemen and the unjust enrichment of a few banks and money exchangers under circumstances involving conflicts of interest.

78. The Panel obtained corroborating bank documents confirming 69 foreign exchange transactions by the Central Bank of Yemen (15 sales of Saudi Arabian riyals (SAR), 48 purchases of Saudi Arabian riyals and 6 purchases of United States dollars) at equivalent United States dollar<sup>66</sup> rates ranging from YER 453 to 740 between 11 October and 28 December 2018.<sup>67</sup> The Panel confirmed that the volume of these transactions for the Central Bank of Yemen resulted in assets (Saudi Arabian riyals and United States dollars) equivalent to \$185,213,526 and a liability of YER 107,313,306,400<sup>68</sup> on 31 December 2018 (see figure VI). If valued at that date using the market exchange rate (Saudi Arabian riyal at YER 131 and United States dollar at YER 521), the Central Bank of Yemen would have had a liability of \$205,975,636 and hence lost \$20,762,110 in that portfolio while sparing the loss to money exchangers, who carry the risk of speculating. Most of these transactions were performed with a significant spread compared to the rates used by money exchangers in the market in Sana'a and Aden (see annex 24).<sup>69</sup> Private banks concerned informed the Panel that they had acted as wholesale brokers channeling cash from foreign exchange operations from selected money exchangers<sup>70</sup> to the Central Bank of Yemen with a maximum consideration of YER 1 per Saudi Arabian riyal handled, that is, less than 0.75 per cent in value. They provided an explanation that the difference from

<sup>63</sup> The claim was that the Central Bank of Yemen had lost YER 8.969 billion as a result of the manipulation of foreign exchange rates between 4 and 29 November 2018. See communication dated 20 January 2019, available at [https://m.facebook.com/story.php?story\\_fbid=24124234014182&id=100027722542809&sfnsn=mo](https://m.facebook.com/story.php?story_fbid=24124234014182&id=100027722542809&sfnsn=mo).

<sup>64</sup> Mohamed Zemam, who had been the Governor of the Central Bank of Yemen since 11 February 2018, was replaced by Hafedh Mayad, who was later replaced by Ahmed Obaid al-Fadhli on 19 September 2019; see [www.sabanew.net/viewstory/53794](http://www.sabanew.net/viewstory/53794). Mayad continues to act as the head of the Economic Committee and adviser to President Hadi.

<sup>65</sup> Illicit enrichment is defined in the United Nations Convention against Corruption as “a significant increase in the assets of a public official that he or she cannot reasonably explain in relation to his or her lawful income”.

<sup>66</sup> Conversion calculated at the average exchange rate of SAR 3.75 to \$1.

<sup>67</sup> Al-Kuraimi Islamic Bank sold SAR 651,000,000 and \$19,500,000, and purchased SAR 147,006,200. Tadamon International Islamic Bank sold SAR 109,760,000. The Panel is not alleging that the banks have diverted any money. Details are provided in annex 24, tables 24.1.a and 24.1.b.

<sup>68</sup> National currency issued is considered a liability for central banks.

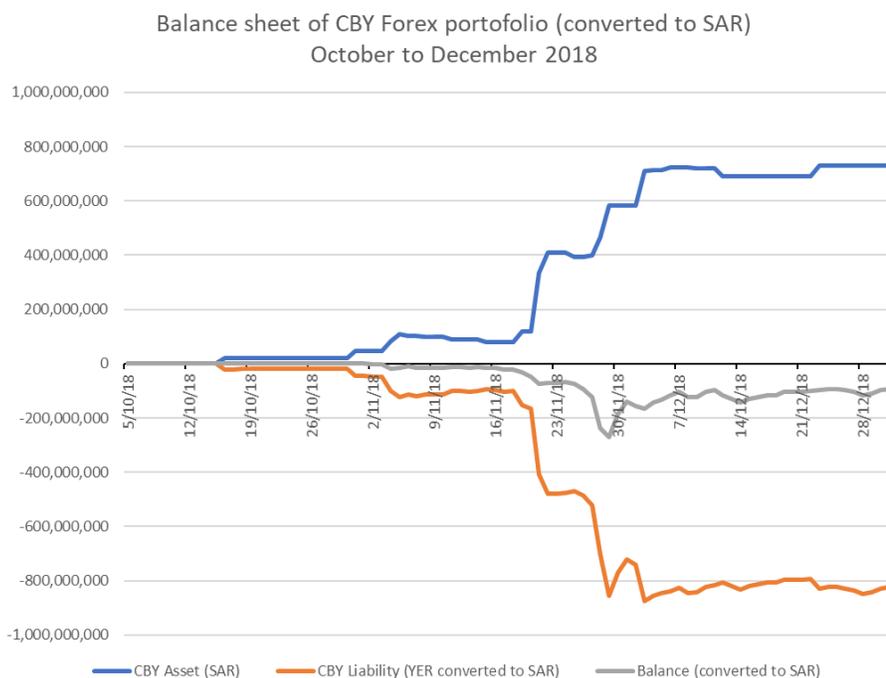
<sup>69</sup> There is no known official market rate; the Panel used the rates published by money exchangers on two Telegram channels: the Yemen exchange association at <https://t.me/YEMENExchangersAssociation> and <https://t.me/NewsExchange>.

<sup>70</sup> Foreign exchange operations of the Central Bank of Yemen were agreed with the Economic Committee, Al-Kuraimi Islamic Bank, Tadamon International Islamic Bank, Aden Exchange Company, Al-Qutaibi Exchange company and Bin Awad Exchange company during a meeting on 21 October 2018.

the market rate was due to a lapse of two to three days between the date of agreement and the recording of the transaction.<sup>71</sup> Therefore, the agreed exchange rate remains suspicious.

79. While the Central Bank of Yemen claimed that its actions allowed the stabilization of exchange rates, the Panel believes that the stabilization was mainly the result of expediting the issuance of letters of credit funded by the Saudi deposit, which stalled during the summer of 2018. However, the transactions allowed the Central Bank of Yemen to inject liquidity in Yemeni rials into the market. The Houthis prohibited traders to transfer cash to the Central Bank of Yemen in Aden, which was required to apply for letters of credit. These applications were beneficial in terms of arbitrage; as an illustration, on 4 November 2018, a trader selling SAR 20 million to the Central Bank of Yemen in Aden would receive a credit of YER 3.81 billion (at a 190.5 rate) and receive a letter of credit worth SAR 24,580,645 (at rate of YER 155 per Saudi Arabian riyal).<sup>72</sup> In addition, SAR 20 million sold back to the Central Bank of Yemen by the same bank on the same day would record a debit of YER 3.7 billion, producing additional arbitrage profits of YER 110 million.

Figure VI  
**Balance sheet of Central Bank of Yemen foreign exchange operations**



80. The Panel had intended to visit Aden in late November 2019 in order to interact with the Central Bank of Yemen and receive information on particular accounts in its archives, as well as with the Central Organization for Control and Auditing, which has reportedly investigated the case. The visit was cancelled by the United Nations for security reasons.

<sup>71</sup> This is not in line with the industry norms, as an agreed transaction settles, by convention, after two business days for this type of foreign exchange, known as a spot exchange.

<sup>72</sup> The United States dollar rate applied to letters of credit financed by the Saudi deposit was YER 580 starting on 9 October 2018, YER 548 starting on 20 November 2018, YER 520 starting on 22 November 2018 and YER 440 starting on 4 December 2018 (figures taken from official decisions of the Central Bank of Yemen communicated to traders).

81. This case demonstrates the need for the Government of Yemen to launch an audit of the Central Bank of Yemen, last performed in 2014, and to reinforce oversight of major financial transactions. The Riyadh Agreement contained several references to combating corruption, which confirms that concerns over illicit enrichment exist.

## **D. Monitoring of asset freeze measures**

### **1. Appropriation of funds covered by asset freeze measures**

82. The Panel discovered a case of non-compliance with asset freeze measures by Yemeni banks that had allowed transfers from accounts held by the Al-Saleh foundation, whose sole beneficiary was Ahmed Ali Abdullah Saleh (YEi.005) until the foundation was appropriated by the Houthis. The Panel interacted with the banks, informing them of their obligations to comply with the sanctions measures. However, the Panel has received information that the Houthis have compelled the banks to transfer funds from these accounts to the Houthis.

83. The Panel received information that the Houthis have seized the Saleh family's assets inside Yemen, including bank accounts, owned by two listed individuals. The Houthis are taking advantage of the complete absence of effective compliance and control over banks. The Central Bank of Yemen in Aden does not have an operational financial investigation unit nor any leverage on banks whose main offices are under Houthi control. The Central Bank of Yemen in Sana'a has not taken the necessary measures to maintain the integrity of the banking system of Yemen. This situation could further jeopardize the credibility of private banks with regard to the management of external payments for imports, humanitarian assistance in the form of cash transfers and remittance transfers. Almost all of the latter operations have moved from being conducted through banks to being conducted through money exchangers, resulting in banks now channeling less than 20 per cent of the volume they transferred before the conflict.<sup>73</sup>

### **2. Diversion of funds by Houthi actors acting on behalf of listed individuals**

84. The Panel considers that the Houthi commanders named below act on behalf of Abdulmalik al-Houthi. Financial or other assistance related to military activities for the benefit of listed individuals and those acting on their behalf or at their direction in Yemen is prohibited under paragraph 14 of Security Council resolution [2216 \(2015\)](#) related to the targeted arms embargo on Yemen.

#### **Money-laundering for the war effort**

85. The Panel obtained documents showing how the Houthis make transfers of public funds to benefit field commanders through the creation of false supply contracts without effective budgetary control. The Panel has documents showing that, in mid-2016, the Central Bank of Yemen in Sana'a transferred more than YER 4.8 billion (\$22 million) to an account in a private bank in Sana'a owned by a company called Levant Vision for the supply of flour to the revolutionary committee (see annex 25). The cash flow of Levant Vision does not show any payments to purchase goods but shows cash transfers to three individuals, not known to be traders. The cash flow also indicates that, within a week or two of the transfer from the Central Bank of Yemen to Yemen Kuwait Bank, YER 4,559,000,000 of cash had been withdrawn:

<sup>73</sup> Interview with bank managers.

YER 370,100,000 by Abdullah Abbas Abdullah Jahaf,<sup>74</sup> YER 2,098,900,000 by Ali Qassem Mohsen al-Ameer and YER 2,090,000,000 by Mohamed Abdullah Mohamed Hassan al-Moayed (see annex 25, table 25.1).

### Unlawful appropriation by the Houthis

86. The Panel investigated, within its mandate, the funding of Houthi military operations through unlawful seizures of assets. These assets have been seized from Yemeni opponents who have been arrested or forced to take refuge outside Yemen. As reported in paragraph 154 and annex 56 of a previous report (S/2018/594), the Houthis established a “committee for identification and seizure of assets owned by traitors”, which ordered the Central Bank of Yemen in Sana’a, on 23 December 2017, to seize all bank accounts owned by 1,223 individuals. In addition, on 14 September 2019, the specialized criminal court in Sana’a announced the confiscation of funds owned by 35 members of the Yemeni parliament who did not align with the Houthis.<sup>75</sup> The Panel also considers that unlawful appropriation is a violation of applicable international human rights law and international humanitarian law.<sup>76</sup>

87. The Panel identified a network involved in diverting funds from the unlawful appropriation of privately owned assets, including those that should have been frozen under Security Council resolution 2140 (2014). Some of these funds include revenues from projects funded by international organizations working in Yemen.

88. The main actor in the network is Saleh Mesfer Alshaer, who was reportedly an arms trader<sup>77</sup> for the Houthis before 2014 with close links to Abdulmalik al-Houthi. On 15 September 2018, he was appointed as the commander of the military logistics support department<sup>78</sup> with the rank of major general (see figure VII) as well as the judicial custodian of funds and assets appropriated from the Houthis’ opponents (see annex 26).

<sup>74</sup> A Houthi commander under the name of Abdullah Abbas Jahaf was reportedly killed in February 2019 by a Coalition air strike while fighting in Hajour, Hajjah. See [www.alarabiya.net/ar/arab-and-world/yemen/2019/02/01/اليمن-مقتل-قيادي-حوثي-بغارات-للتحالف-في-حجة](http://www.alarabiya.net/ar/arab-and-world/yemen/2019/02/01/اليمن-مقتل-قيادي-حوثي-بغارات-للتحالف-في-حجة).

<sup>75</sup> <https://sabaanews.net/news3067799.htm>.

<sup>76</sup> Article 17 of the Universal Declaration of Human Rights (1948); article 25 of the Arab Charter on Human Rights (1994); article 4 (2) (g) of the Protocol additional to the Geneva Conventions of 12 August 1949, and relating to the protection of victims of non-international armed conflicts; and rules 50 and 52 of the International Committee of the Red Cross study on customary international humanitarian law (available at [https://ihl-databases.icrc.org/customary-ihl/eng/docs/v1\\_rul](https://ihl-databases.icrc.org/customary-ihl/eng/docs/v1_rul)).

<sup>77</sup> The Panel has copies of his passports, including one issued on 7 October 2013 in which his profession is indicated as a trader. See also [www.khlaasa.net/news168458.html](http://www.khlaasa.net/news168458.html).

<sup>78</sup> [www.26sep.net/news\\_details.php?sid=141549](http://www.26sep.net/news_details.php?sid=141549).

Figure VII  
**Major general Saleh Mesfer Alshaer in a ceremony for his appointment as commander of the logistics support department, 15 September 2018**



Source: [www.26sep.net/news\\_details.php?sid=141549](http://www.26sep.net/news_details.php?sid=141549).

89. Alshaer has used a Sana'a-based network comprising family members, the specialized criminal court,<sup>79</sup> the national security bureau, the Central Bank of Yemen in Sana'a, the registrar services of the ministry of trade and industry and some private banks. The Panel has observed a modus operandi based on extortion, intimidation and the illegal arrest of company managers and bank directors, with threats of accusing them of collaboration and spying for the enemy unless they comply with judicial custodian orders. Major general Motlaq Amer al-Marrani, the former deputy head of the national security bureau, played a significant role by orchestrating the arrest of bank owners, managers and staffers.<sup>80</sup> Table 4 shows a list of selected cases with evidence gathered by the Panel. The list is only an illustration of a wider financial operation probably used to finance the war effort.

<sup>79</sup> The Panel finds that the court orders were not issued after due legal process and were issued in the absence of the victims. Furthermore, the Panel has not seen any language in the court orders nor received evidence that would suggest that “the seizure [was] imperatively demanded by the necessities of the conflict” (see customary international humanitarian law rule 50).

<sup>80</sup> This includes the arrests and alleged torture of Ahmed Saleh Ali Arrahbi from early December 2018 to mid-February 2019, from early March to mid-April 2019 and from early September to late October 2019, and also the arrests of the managing directors of Tadamon International Islamic Bank, Yemen Kuwait Bank and the International Bank of Yemen, as well as of owners of money exchangers (see annex 26, para. 3).

Table 4  
Appropriated assets identified by the Panel

<i>Appropriated</i>	<i>Original owner</i>	<i>Revenues identified</i>
Al-Saleh foundation <sup>a</sup>	Ahmed Ali Abdullah Saleh	Funds of Ahmed Ali Abdullah Saleh
Yemen Armored <sup>b</sup>	Ahmed Saleh Ali Arrahbi <sup>c</sup>	Provision of security for a number of United Nations agencies <sup>d</sup>
University of Technology Twintech <sup>e</sup>	Khaled Rashad al-Alimi	Education tuition fees
Sabafon	Al-Ahmar family, including Hamed al-Ahmar	Not yet identified
Orphans Development Foundation, also known as Al-Yateem <sup>f</sup>	Hamdi Zayad	Transfer from Save the Children <sup>g</sup>

<sup>a</sup> After its appropriation, the foundation was renamed Al-Shaab foundation on 24 July 2018 by the ministry of social affairs and labour under Houthi control, without the approval of its legal board of directors.

<sup>b</sup> [www.yemenarmored.com/](http://www.yemenarmored.com/).

<sup>c</sup> Mr. Arrahbi sent an email on 14 July 2019 to the United Nations resident coordinator and other United Nations personnel stating that he had been tortured and that his company had been appropriated by the Houthis.

<sup>d</sup> The Panel has documents showing a transfer from the Food and Agriculture Organization of the United Nations, the United Nations Development Programme (UNDP), the United Nations Children's Fund and the World Health Organization of \$3,215,235 to an account owned by Yemen Armored between 25 October 2018 and 26 June 2019. This information was shared with the United Nations resident coordinator in Yemen in a letter dated 24 July 2019 to raise awareness within United Nations agencies contracting Yemen Armored. The Panel received further information that UNDP had transferred \$995,197.35 to Yemen Armored in six instalments during October and November 2019 (see figure VIII). UNDP confirmed that it had had an agreement with Yemen Armored, with Mr. Arrahbi as director, since 2017, and informed the Panel that it had not been aware of any change in the management of Yemen Armored until it had received the Panel's letter of 11 November 2019.

<sup>e</sup> [www.iutt.edu.ye/index.php/m/20](http://www.iutt.edu.ye/index.php/m/20).

<sup>f</sup> [www.yateemdev.org/](http://www.yateemdev.org/). The Modern Technology College (<http://mtc-ye.net/>) and the Rawafed Institute for Training and Development ([www.facebook.com/rawafed2013/](https://www.facebook.com/rawafed2013/)) are known subsidiaries (see figure IX); the Rawafed Institute and the Orphans Development Foundation reported projects funded by Care International (see [www.yateemdev.org/?news=عدد-التنمية-يختتم-عدد](http://www.yateemdev.org/?news=عدد-التنمية-يختتم-عدد)) and Human Appeal Australia (see [www.yateemdev.org/?news=هيئة-الأعمال-الخيرية-استرال](http://www.yateemdev.org/?news=هيئة-الأعمال-الخيرية-استرال)).

<sup>g</sup> Evidence shows a deposit of YER 24 million (around \$48,000) for a project.

Figure VIII  
Account statement of Yemen Armored, November 2019

INTERNATIONAL BANK OF YEMEN Y.S.C		بنك اليمن الدولي		
Acc. No. : 0002 - 313106 - 002	Statement of Account	Date: 02-12-2019	Currency : USD	
Acc. Name : YEMEN ARMORED				
01 Nov 19	Credit balance	3,155,536.33 CR		
Posting Date	Transaction Description	Value Date	Transaction Amount	Balance
04 Nov 19	TRC 1341012135 TRF FROM U N D P XT16 TRF FROM ACC 0002-018621-002		241,543.45	3,397,079.78 CR
06 Nov 19	TRD 15276810 TO TAX AUTHORITY Z642 TRF TO ACC 0001-400802-840		-6,793.00	3,390,286.78 CR
06 Nov 19	TRD 15276811 TO TAX AUTHORITY Z642 TRF TO ACC 0001-400802-840		-46,045.00	3,344,241.78 CR
11 Nov 19	TRC 1341012256 TRF FROM U N D P XT16 TRF FROM ACC 0002-018621-002		237,543.45	3,581,785.23 CR
11 Nov 19	TRC 1341012257 TRF FROM U N D P XT16 TRF FROM ACC 0002-018621-002		4,000.00	3,585,785.23 CR
11 Nov 19	TRC 1341012258 TRF FROM U N D P XT16 TRF FROM ACC 0002-018621-002		29,023.55	3,614,808.78 CR
30 Nov 19	Credit balance	3,614,808.78 CR		
Total Debits :		-52,838.00		
Total Credits :		512,110.45		

Source: Confidential.

Figure IX  
Major general Saleh Mesfer Alshaer, president of the Orphans Development Foundation, attends the graduation ceremony of Modern Technology College, 16 July 2019



Source: [www.yateemdev.org/?news=صا-اللواء-المؤسسة-الرئيس-من-كريمة-من-رعاية-كريمة](http://www.yateemdev.org/?news=صا-اللواء-المؤسسة-الرئيس-من-كريمة-من-رعاية-كريمة).

90. The network is described in figure X and details are provided in annex 26, table 26.2. The Panel communicated with Alshaer, requesting his comments on the allegation. He acknowledged the message and promised to reply to the Panel if necessary. The Panel also shared the names of the network and the allegation with the Central Bank of Yemen in Sana'a, with a copy to the ministry of foreign affairs under Houthi control in Sana'a. The Panel has yet to receive a reply.



that, since 2016, it has sent 11 letters concerning more than 40 air strikes for which it is still awaiting replies. This impedes the Panel's ability to conclude its investigations.

Table 5  
**Air strikes between December 2018 and December 2019**

<i>Case</i>	<i>Date</i>	<i>Location</i>	<i>Impact point</i>	<i>Victims/damage</i>
1	16 December 2018	N 14°28'12.1" E 45°20'08.8"	Car, Sawadiyah, Bayda'	2 children killed
2	23 March	N 17°2'4.32" E 44°6'30.24"	Gas station and hospital, Kitaf, Sad'ah	7 killed, including 4 children, and 6 injured
3	4 April	N 14°28'03.3" E 45°20'37.5"	Car, Sawadiyah, Bayda'	4 killed
4	16 May	N 15°21'31.14" E 44°11'4.00"	Houses, Raqqas, Sana'a	Approximately 5 children killed and approximately 78 people injured, including 30 children
5	24 May	N 13°38'25.2" E 44°22'32.8"	Gas station, Mawiyah, Ta'izz	7 killed, including 5 children, and 2 injured
6	28 June	N 13°24'55.29" E 44°15'03.08"	House, Warzan, Khadir, Ta'izz	7 killed, including 4 children, and 4 injured, including 2 children
7	31 August	N 14°36'52.82" E 44°21'44.51"	Dhamar community college (used as a prison), Dhamar	Approximately 100 killed and 40 injured
8	24 September	N 13°52'53" E 44°34'31.3"	House, Qatabah, Ad Dali'	14 killed, including 7 children, and 3 injured

#### **Case summary: Dhamar community college**

94. On 31 August 2019, several explosive ordnances were dropped from aircraft<sup>81</sup> on buildings of the Dhamar community college compound (see figures XI to XIII).

95. At least one of these buildings was used as a prison by Houthi forces.<sup>82</sup> The International Committee of the Red Cross has reported that the facility held about 170 detainees.<sup>83</sup> The incident resulted in the injury of at least 40 people and the death of at least 100 people. The Coalition confirmed the strike but claimed that the site was of a military nature due to the presence of Houthis and air defence equipment. It also held that the site was not registered on the no-strike list of the United Nations and was more than 10 km from the registered prison in Dhamar,<sup>84</sup> implying that the Coalition did not know about the presence of prisoners in that compound. However, this site has been used as a prison since at least 2017 and was mentioned in a previous report of the Panel.<sup>85</sup> In addition, the presence of detainees was well known locally.

<sup>81</sup> The Panel has evidence that at least three strikes hit the compound and witnesses reported up to six explosions.

<sup>82</sup> Confidential sources.

<sup>83</sup> [www.icrc.org/en/document/yemen-scenes-devastation-every-single-detainee-either-killed-or-injured-attack](http://www.icrc.org/en/document/yemen-scenes-devastation-every-single-detainee-either-killed-or-injured-attack).

<sup>84</sup> See [www.spa.gov.sa/viewstory.php?lang=en&newsid=1964154](http://www.spa.gov.sa/viewstory.php?lang=en&newsid=1964154).

<sup>85</sup> S/2018/594, para. 176. At the time, the Panel mentioned that the number of prisoners in that facility varied between 25 and 100.

96. Under international humanitarian law, parties to the conflict have to take all feasible precautions to avoid or minimize incidental loss of civilian life, injury to civilians and damage to civilian objects.<sup>86</sup> This requires military commanders and others involved in attacks to assess information from all sources at their disposal and to obtain the best intelligence possible.<sup>87</sup> Under international humanitarian law, detainees, whether civilians or fighters hors de combat, shall be considered, prima facie, as not taking part in hostilities and as such protected against direct attack. It is likely that some Houthi guards were present at the site; however, the Panel has received information indicating that around 140 detainees were killed or injured in the incident. Unless Saudi Arabia provides the Panel with information to the contrary, the Panel concludes that the principles of proportionality and precaution were not respected. Further information, as well as details on seven other cases, is provided in annex 27.

97. In all cases investigated, the information and evidence gathered by the Panel lead to the conclusion that it is likely that the principles of distinction, precaution or proportionality were not respected.

Figure XI

**Location of air strike on Dhamar community college (indicating one of the buildings in which prisoners were held)**



Source: Google Earth.

<sup>86</sup> Customary international humanitarian law rule 15.

<sup>87</sup> See customary international humanitarian law rule 15 and commentary.

Figure XII  
**Point of impact of aerial bombs in two different buildings of the Dhamar community college compound**



Source: confidential.

Figure XIII  
**Aerial image of another building of the Dhamar community college compound targeted by the Coalition to Support Legitimacy in Yemen**



Source: Joint Incident Assessment Team, [www.youtube.com/watch?v=btm40ud0y04](https://www.youtube.com/watch?v=btm40ud0y04).

98. During its visit to Aden in June, the Panel was informed that accusations against three individuals had been filed under military law by the Office of the Prosecutor with regard to the air strike on 8 October 2016 against a funeral hall in Sana'a (see S/2018/193, paras. 121–125). The Panel has sent a letter to the Government of Yemen in this regard and is awaiting a reply.

99. During its visit to Riyadh in September, the Joint Incident Assessment Team informed the Panel that it had concluded that technical failures had occurred in 10 incidents investigated since 2015 and that it had referred eight more cases to the military prosecutor (see tables 6 and 7 below). The Panel sent a letter to Saudi Arabia asking for details about these investigations and the subsequent legal procedures and is awaiting a reply.

Table 6  
**Technical failures**

<i>No.</i>	<i>Case</i>	<i>Location</i>	<i>Date</i>
1	Street in Sa'dah	Sa'dah	2 June 2015
2	Sham water factory	Hajjah	30 August 2015
3	Sa'baa university	Sana'a	16 July 2015
4	Two houses in Saba'in district	Sana'a	22 September 2015
5	House in Faj Attan <sup>a</sup>	Sana'a	25 August 2017
6	Building in Dar Saber	Ta'izz	26 May 2015
7	Building near ministry of defence	Sana'a	10 November 2017
8	Hasabah district	Sana'a	21 December 2015
9	Kitaf hospital <sup>a</sup>	Sa'dah	26 March 2019
10	Qobari district	Sana'a	9 June 2017

*Source:* Joint Incident Assessment Team.

<sup>a</sup> Reported by the Panel.

Table 7  
**Cases referred to the military prosecutor**

<i>No.</i>	<i>Case</i>	<i>Location</i>	<i>Date</i>
1	Haydan hospital	Sa'dah	26 October 2015
2	Abs hospital <sup>a</sup>	Abs	5 August 2016
3	Great hall <sup>a</sup>	Sana'a	8 October 2016
4	Sa'dan well	Sana'a	10 September 2016
5	Car in Ma'rib <sup>a</sup>	Ma'rib	16 September 2017
6	Bus <sup>a</sup>	Sa'dah	9 August 2018
7	Wedding in Bani Qees <sup>a</sup>	Hajjah	22 April 2018
8	Cholera treatment facility	Hajjah	11 June 2018

*Source:* Joint Incident Assessment Team.

<sup>a</sup> Reported by the Panel.

## 2. Violations of international humanitarian law and international human rights law associated with detention and attributable to the Coalition

100. The Panel investigated four cases of violations of international humanitarian law and international human rights law by Saudi Arabia and the United Arab Emirates involving arbitrary arrest and detention, ill-treatment, torture and enforced disappearance.<sup>88</sup> One individual was arrested by the Shabwani Elite Forces in Ataq, Shabwah, held in Balhaf, and moved to Rayyan, Hadramawt. Another individual was detained by Saudi Arabia in Ghaydah, Mahrah, and one was arrested and held by the United Arab Emirates at its base in Burayqah. In addition, one individual was arrested in Abyan, then held by Major General Shallal Ali Shaye and was ultimately held in Burayqah. Among these four individuals, only one has been released, in 2018; he was allegedly tortured during his detention in the United Arab Emirates base in Burayqah. The current whereabouts of the three others remain unknown. More information is provided in confidential annex 28. The Panel sent letters to Saudi Arabia and the United Arab Emirates and is awaiting a reply.<sup>89</sup>

101. The Panel also investigated an additional 13 cases of arbitrary arrest, ill-treatment, torture and enforced disappearances by the Security Belt Forces and the Shabwani Elite Forces. These forces have been created by and have received salaries, training and weapons from the United Arab Emirates. Considering its close relationship with the Security Belt Forces, the United Arab Emirates has an obligation to ensure respect for international humanitarian law, including by exerting its influence over the Security Belt Forces to prevent and end violations.<sup>90</sup> The United Arab Emirates should also exercise due diligence to prevent and put an end to human rights violations committed by the Security Belt Forces. More information is provided in confidential annex 28.

## 3. Violations of international humanitarian law and international human rights law attributable to the Government of Yemen

102. The Panel investigated cases of arbitrary arrest and detention, enforced disappearances and killing by the Government of Yemen forces in Ta'izz, Ma'rib and Shabwah (more information is provided in confidential annex 29). On 3 October 2019, in Azzan, Shabwah, members of the Government of Yemen forces intervened using excessive force in what appeared to be a civilian demonstration. During the incident, one civilian was killed and two others were injured; a further 15 civilians, including journalists, were arrested.

103. The Panel has documented five cases of arbitrary arrest, detention and enforced disappearances by the Twenty-second Brigade in Ta'izz. The families were without news of their relatives for periods of between 10 months and two years. The individuals are now detained at a known location in Ta'izz.

104. The Panel is investigating the case of a shelling on 20 August 2019, which resulted in the death of two children and the injury of two more children, in Hajar, Ta'izz, during a period of clashes between the Government of Yemen armed forces and the Thirty-fifth Brigade of the Government of Yemen armed forces. The Panel

<sup>88</sup> See customary international humanitarian law rules 90, 98, 99, 100, 117, 123 and 126. See also the Arab Charter on Human Rights, articles 3, 5, 6, 8, 13 and 16.

<sup>89</sup> On 27 November, the United Arab Emirates sent a letter to the Panel stating that the authorities needed more time to reply.

<sup>90</sup> Common article 1 of the Geneva Conventions and *Military and Paramilitary Activities in and against Nicaragua (Nicaragua v. United States of America)*, *Merits, Judgment*, I.C.J. Reports 1986, p. 14, para. 220.

has sent letters to the Government of Yemen and is awaiting a reply. More information is provided in annex 30.

#### **4. Violations of international humanitarian law and human rights attributed to the Security Belt Forces**

105. The Panel received information on 54 people who were arbitrarily arrested and detained and subjected to enforced disappearance by the Security Belt Forces in Aden between 2016 and 2019. The Panel was able to gather further evidence on 11 of the cases. More information is provided in confidential annex 28.

106. As mentioned in paragraph 25, the Security Belt Forces are not under the control of the Government of Yemen. The Panel has two documents from 2018 in which the Ministry of the Interior requests the leader of the Coalition in Aden and the Security Director of Aden to refer the cases of 12 detainees to the Office of the Prosecutor; 2 of those individuals were released and 10 remain missing. Orders from the Office of the Prosecutor are not always followed by the Security Belt Forces. The Government of Yemen confirmed to the Panel that it does not have authority over Bir Ahmed and Al-Mansoura prisons, which are two large prisons in Aden, and a prison in Mukalla.<sup>91</sup>

107. This situation results in people being arrested and detained outside the protection of the law, some of whom are also tortured. Many have been missing for several years, leaving their families with no effective legal recourse. Inasmuch as they exercise government-like functions, the Security Belt Forces are bound by human rights norms. The lack of the rule of law creates an environment conducive to human rights violations and threatens the security of civilians.

108. In addition, in August, the Panel received information and evidence of civilian men being put into trucks and taken out of Aden by Security Belt Forces because they were from northern governorates, mainly from Ta'izz, and did not possess identification or could not prove residence in Aden. The Panel also received information and evidence about civilian property, especially shops, belonging to people from northern governorates being targeted and damaged in the Sheikh Othman and Mansoura districts, Aden, and information about journalists and others receiving threats because of their opposition to the southern transitional council after 10 August 2019 (see para. 30). The Panel received specific evidence regarding three such cases.

## **B. Acts and incidents attributed to the Houthi forces**

### **1. Indiscriminate use of explosive ordnance against civilians**

109. The Panel received information about 14 incidents involving the use of explosive ordnance against civilians and attributed to Houthis. The Panel was able to conclude investigations in two of these cases and found that the two cases resulted in the death of 3 civilians, including 2 children, and injuries to 16 others, including children. The use of unguided explosive ordnance in populated areas raised issues regarding compliance with the applicable rules of international humanitarian law. Mortar bombs and artillery shells have a high level of inaccuracy, and the likelihood of indiscriminate effects increases when those weapons are used at long range on targets in proximity to civilians and civilian objects.<sup>92</sup> Details of the two incidents are provided in annex 31.

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<sup>91</sup> Bir Ahmed and Al-Mansoura prisons are under the control of the Security Belt Forces and the prison in Mukalla is under the control of the Hadramawt Elite Forces. Letter dated 4 October 2019 from the Government of Yemen. See also [S/2018/594](#), paras. 180–182.

<sup>92</sup> See common article 3 of the Geneva Conventions and customary international humanitarian law rule 1.

110. The Panel also documented three attacks claimed by Houthis on Abha International Airport, Saudi Arabia (see para. 58):<sup>93</sup>

(a) On 12 June 2019, a missile hit the airport, resulting in 26 civilians injured, including 3 children, and material damage to the airport;

(b) On 23 June 2019, a drone hit the airport, resulting in the death of 1 civilian and the injury of 21;

(c) On 2 July 2019, a missile hit the airport, resulting in 10 civilians injured and material damage to the airport.

## 2. Violations associated with the deprivation of liberty

111. The Panel is investigating 53 cases of detention-related violations of international humanitarian law and human rights norms, including arbitrary arrest and detention, ill-treatment, torture and lack of due legal process, committed by Houthi forces. In the majority of the cases, detainees were kept in places unknown to their relatives for periods of between 40 days and four years. In one case, the detainee's fate is still unknown. More information is provided in confidential annex 32.

112. Among these cases, the Panel investigated the case of 10 individuals arrested between September and November 2018 and whose whereabouts were unknown to their families until they appeared on television in Sana'a on 17 April 2019. They, along with 52 other Yemenis and foreign leaders, are accused of being involved in a conspiracy to kill Saleh Ali Mohammed al-Sammad in April 2018, who was the head of the supreme political council at that time. On 7 August 2019, one of the detained individuals died. Their lawyers and families are not allowed to communicate with them or to visit them and their place of detention is unknown.

113. The Panel also investigated the case of 36 people arrested on different dates in 2015 and 2016 and detained in the political security prison in Sana'a. On 9 July 2019, 30 of the people were sentenced to death by the specialized criminal court in Sana'a; the decision is under appeal. The Panel received information that six others were released but could only verify the release of one. According to documentary evidence and testimonies received by the Panel, some of the individuals were tortured during their detention and denied medical care, and their lawyers received threats and were not allowed to visit them in prison.

114. The evidence received by the Panel, including judicial documents, show a lack of respect of judicial guarantees by the courts under Houthi control. In addition, the cases investigated demonstrate a pattern of keeping detainees in undisclosed locations, subjecting them to torture and not allowing them to communicate with their families in contravention of applicable international humanitarian law and human rights norms.<sup>94</sup>

## 3. Violations associated with the use of landmines and other explosive ordnance

115. According to information received by the Panel, the number of victims of explosive ordnance, including landmines, is continuously increasing.<sup>95</sup> In its midterm

<sup>93</sup> The Panel received information about the number and nationality of the victims and about damage to the airport from Saudi Arabia.

<sup>94</sup> Customary international humanitarian law rules 90, 98, 100, 123 and 125.

<sup>95</sup> This pattern seems to be confirmed by other organizations; see <https://civilianimpact.activehosted.com/social/50905d7b2216bfecb5b41016357176b.1314>, [www.acleddata.com/2019/01/30/how-houthi-planted-mines-are-killing-civilians-in-yemen/](http://www.acleddata.com/2019/01/30/how-houthi-planted-mines-are-killing-civilians-in-yemen/) and [www.hrw.org/news/2019/04/22/yemen-houthi-landmines-kill-civilians-block-aid](http://www.hrw.org/news/2019/04/22/yemen-houthi-landmines-kill-civilians-block-aid).

update, the Panel also presented evidence that Houthi forces were importing components for the manufacture of landmines.

116. The Panel documented 23 specific cases of civilian victims of mines, including 7 children injured and 1 man and 7 children killed. The cases occurred in Bayda', Hudaydah, Shabwah and Ta'izz. Most of the victims, 11 cases, occurred in Hudaydah, mainly in the district of Durayhimi, and in Tuhayta' and Hays, and 5 occurred in Ta'izz.

117. The Panel also received evidence that Houthi forces deployed a significant number of landmines along the west coast, especially between Dhubab and the north of Khawkhah, in Ta'izz Governorate. For example, in Ruways village,<sup>96</sup> hundreds of landmines were deployed, and, despite demining operations, numerous remain in place, creating an impediment to the return of civilians previously displaced by Houthi forces.<sup>97</sup>

### C. Gender-based violations

118. The Panel received evidence that, especially since the end of 2017, that is, after the death of Ali Abdullah Saleh, women trying to have an active role in the public space either by being part of a political movement, participating in demonstrations or working for non-governmental organizations on projects related to the empowerment of women have been targeted by Houthis. The Panel documented the arrest, detention, and ill-treatment and/or torture of 11 women, 3 of whom were repeatedly raped in Houthi custody. The Panel is also investigating the role of *zainabiyat* in international humanitarian law and human rights violations against women and of the head of the criminal investigation department in Sana'a, Sultan Zabin (see para. 22).

119. The Panel also received testimony from several humanitarian actors about the fact that, in general, Houthi authorities refuse to approve non-governmental organization projects relating to women and peace and security or the empowerment of women. The Panel also investigated cases of women arrested and detained for reasons related to their humanitarian work. These cases show a pattern of violations against women including discrimination, arbitrary arrest and detention, acts of physical violence, including torture and rape, and a lack of due process. More information is provided annex 5.

### D. Recruitment and use of children in armed conflict

120. The Panel received information about the endemic use of children in hostility-related activities in Yemen.<sup>98</sup> It was able to document three cases of children between the ages of 12 and 15 used by Houthi forces to fight in 2017 and 2018. In two cases, the children were abducted either from their home or school. In the other case, the child was lured away from his home by Houthis who told him he was going to participate in a three-day educational camp. The three children were sent to training camp for three to four months, where they received lectures about ideology and jihad and were trained in the use of small arms. They were later sent to front lines at the border between Ta'izz and Hudaydah or in Ma'rib and forced to undertake various tasks, including fighting. They reported hard conditions, including beating, and no visits to their families. None received a payment or a salary (see details in annex 33).

<sup>96</sup> N 13°31'10.79", E 43°16'15.93".

<sup>97</sup> See customary international humanitarian law rules 81, 82 and 132.

<sup>98</sup> Although the number is probably much higher, between April 2013 and December 2018, the United Nations verified the recruitment and use of 3,034 children by parties to the conflict in Yemen, mostly Houthi forces (S/2019/453, paras. 17–18).

The Panel also received testimonies about children being trained in Saleh city, Ta‘izz, which is a Houthi centre and a prison.<sup>99</sup>

## **VI. Obstruction of the delivery and distribution of humanitarian assistance**

121. Pursuant to paragraph 19 of Security Council resolution 2216 (2015), the Panel continued to investigate the obstruction of the delivery of humanitarian assistance to Yemen, including access to and the distribution of such assistance.

### **A. Obstruction of the delivery of humanitarian assistance**

122. The Panel investigated nine medical and nutritional shipments that were delayed for a period between 16 and 169 days at the port of Aden. The Government of Yemen confirmed these delays but did not provide reasons. The authorities' obligation to ensure rapid and unimpeded passage of humanitarian relief covers the initial entry of aid into the country.<sup>100</sup>

### **B. Obstruction of the distribution of humanitarian assistance**

123. According to information received by the Panel, threats and incidents against humanitarian workers are increasing in Houthi-controlled areas.

124. The Panel continues to receive information on: (a) arrests and intimidation of humanitarian workers; (b) illegal seizures of the personal property of humanitarian workers and property belonging to humanitarian organizations in Sana'a; (c) non-respect for the independence of humanitarian organizations; and (d) numerous administrative and bureaucratic impediments, including delays in the approval of subagreements for up to 11 months, and time-consuming meetings and negotiations with the national authority for the management and coordination of humanitarian affairs and disaster recovery. For example, one organization reported to the Panel that these meetings were taking up to 50 per cent of the time of some of its employees. The issue of the manipulation of beneficiary lists and/or pressure to share these lists is of particular concern, and cases involving the use of violence and coercion at aid distribution points have increased in 2019.

125. Some humanitarian actors reported to the Panel that they had been denied access to certain areas or denied travel authorization because they had refused to share information on beneficiaries or personal information about their national staff.

126. The Panel investigated three incidents of violence against humanitarian workers at distribution points in order to influence or control distribution. In one incident, humanitarian assistance items were looted, and in another they were diverted. The Panel also investigated five cases of humanitarian workers arrested and detained, including women (see confidential annex 34).

127. On 6 November, the supreme council for the administration and coordination of humanitarian affairs and international cooperation was established to replace the national authority for the management and coordination of humanitarian affairs and disaster recovery by the Houthi authorities, and Abdul Mohsen Abdullah Qasim Attawoos, a Houthi leader, was nominated as its head (see para. 18). This recent development has had the effect of halting many humanitarian activities during the

<sup>99</sup> 13°39'52.1"N 44°07'42.9"E.

<sup>100</sup> Customary international humanitarian law rule 55.

transition period. Of particular concern is the provision in article 13 (3) of supreme political council Decree No. 201 of 2019<sup>101</sup> that 2 per cent of the budget of each humanitarian project approved will serve to finance the new entity.

## VII. Recommendations

128. The Panel recommends that the Security Council:

(a) Include in its upcoming resolution language demanding that the Houthis cease unlawful appropriations and the use of social foundations as a source for funding military logistic support; that they take immediate measures to protect the integrity of the Central Bank of Yemen in Sana'a and Yemeni private banks and ensure their compliance with anti-money-laundering activities, to avoid further damaging their reputation with their correspondent banks; and that they cease the unlawful arrests and intimidation of managers and staff of Yemeni banks;

(b) Include in its upcoming resolution language condemning the enforced disappearance, sexual violence and repression of women expressing political views or taking part in demonstrations, and expressing its intention to impose sanctions on those who engage in these acts;

(c) Include in the agenda of the monthly meeting on Yemen a focused discussion on the challenges faced by women in Yemen, including with regard to sexual violence and political repression, and to examine to what extent women have been meaningfully included in the peace agreements concluded in 2018 and 2019 and, if not, what the challenges were and the methods used to overcome those challenges, and consider including in this discussion relevant United Nations agencies and other Yemeni stakeholders working on women-related issues;

(d) Establish a working group on the challenges posed to peace and security by the development by armed groups of new, longer-range weapon systems, such as uncrewed aerial vehicles, waterborne improvised explosive devices and land attack cruise missiles, as well as the risk posed by the potential proliferation of those technologies resulting in their use by terrorist groups, and to elaborate recommendations on mitigation measures to be implemented by Member States and the industry to address those threats;

(e) Include in its upcoming resolution language establishing a list of commercially available components, such as engines, servo actuators and electronic parts, that have been used by the Houthi forces and other sanctioned individuals and entities to assemble uncrewed aerial vehicles, waterborne improvised explosive devices and other weapon systems, and a request to Member States to use that list to sensitize their customs and export control authorities on the threats emanating from the proliferation of those weapon systems.

129. The Panel recommends that the Committee:

(a) Issue a press release calling on the Government of Yemen and members of the Coalition (Saudi Arabia, Sudan and the United Arab Emirates) who have military forces operating in Yemen to remind them that they must strictly adhere to international humanitarian law, investigate and prosecute their personnel who commit violations of international humanitarian law, and actively engage in preventing violations by affiliated armed groups;

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<sup>101</sup> On file with the Panel.

(b) Issue a press release calling on the Houthis and other armed groups to strictly adhere to international humanitarian law and to investigate and prosecute their members who commit violations of international humanitarian law;

(c) Send a letter to the Government of Yemen encouraging it to launch an investigation into the case described in the present report of alleged illicit enrichment in the Central Bank of Yemen, and designate a focal point with the Panel to share information on potential cases of money laundering;

(d) Send a letter to the Government of Yemen encouraging it to establish a mechanism, with the support of relevant United Nations agencies, for the identification of funds and assets unlawfully appropriated by the Houthis and inform private banks of their liability; such a mechanism should allow Yemeni individuals outside Yemen to report information on their lost assets;

(e) Send a letter to the office of the Secretary-General requesting it to approach relevant United Nations agencies to take necessary and immediate measures to improve their due diligence mechanisms with the aim of preventing potential non-compliance with sanctions measures; this should include an effective “know your counterparty” database, which should be compiled and made available to United Nations and humanitarian actors working in Yemen to assist them in clearly identifying individuals and entities acting on behalf of listed individuals;

(f) Send a letter to Saudi Arabia informing it of the importance of the Saudi deposit as a tool for humanitarian assistance and encouraging it to improve the way the deposit is used so that it benefits all Yemenis and is prevented from being used as a tool of economic warfare.

## List of annexes

	<i>Page</i>
1. Methodology . . . . .	50
2. Map of Yemen UN Geographic Information Systems (GIS) map . . . . .	55
3. Summary of Panel correspondence (2019) . . . . .	56
4. Information on preventative security . . . . .	58
5. Opposition to dissent in Houthi controlled areas against women . . . . .	59
6. Further evidence on involvement of Sultan Zabin in Violations . . . . .	66
7. Significant Houthi appointments in 2019 . . . . .	67
8. Proliferation of armed groups in Yemen . . . . .	68
9. Names of individuals in identified armed groups . . . . .	73
10. The situation in Attaq, Shabwah (17 to 24 June 2019) . . . . .	74
11. Map of Ta'izz Frontlines as at June 2019 . . . . .	79
12. The military leadership in Ta'izz and integration of resistance forces into GoY in Ta'izz . . . . .	80
13. Results of the security campaign in Ta'izz in 2019 . . . . .	81
14. Case study on the attacks on the Saudi Aramco facilities in Abqaiq and Khureys on 14 September 2019 . . . . .	82
15. Components of the Delta-design UAV . . . . .	90
16. Components of the 'Quds-1' LACM . . . . .	96
17. Houthi supply networks for commercial parts used in UAVs and WBIEDs . . . . .	100
18. Map of Houthi supply networks documented during the reporting period . . . . .	114
19. Weapons and arms-related materials seized in Aden . . . . .	115
20. Weapons and arms-related materials seized from a dhow in the Arabian Sea . . . . .	120
21. Delay of tankers proceeding to al Hudaydah port . . . . .	129
22. Documents indicating instructions to disguise the origin of the fuel . . . . .	133
23. Taurus pistols delivered for Djibouti security forces and found in the black market in Sana'a . . . . .	143
24. Alleged Forex manipulation . . . . .	144
25. Levant Vision money laundering for the Houthis . . . . .	154
26. Unlawful appropriation by major general Saleh Mesfer Alshaer network . . . . .	159
27. Cases of air strikes between December 2018 and December 2019 . . . . .	175
28. Violations in the context of detention by the Coalition and associated armed groups . . . . .	192
29. Violations in respect to detention attributed to the GoY . . . . .	193
30. Use of explosive ordnance in a civilian area attributed to the GoY, Al Hajjar, Ta'izz, 20 August 2019 . . . . .	194
31. Use of explosive ordnance against civilian populated areas 2019 attributed to Houthi forces . . . . .	196
32. Violations in the context of detention attributed to the Houthis forces . . . . .	202
33. Recruitment and use of children in armed conflict . . . . .	203

34. Cases of obstruction to the distribution of humanitarian assistance . . . . .	205
35. Full list of abbreviations . . . . .	206

## **Annex 1. Methodology**

1. Due to the fact that its report was leaked in January 2019, including with its confidential annexes, the Panel has refrained from including confidential annexes that have the potential to endanger sources and/or victims in the report. The Panel has agreed with the Secretariat that confidential annexes with relevant sensitive information will be made available to members of the Committee for viewing at the Secretariat's office.
2. The Panel used satellite imagery of Yemen procured by the United Nations from private providers to support investigations. It also used commercial databases recording maritime and aviation data and mobile phone records. Public statements by officials through their official media channels were accepted as factual unless contrary facts were established. While it has been as transparent as possible, in situations in which identifying sources would have exposed them or others to unacceptable safety risks, the Panel does not include identifying information.
3. The Panel reviewed social media, but no information gathered was used as evidence unless it could be corroborated using multiple independent or technical sources, including eyewitnesses, to appropriately meet the highest achievable standard of proof.
4. The spelling of toponyms within Yemen often depends on the ethnicity of the source or the quality of transliteration. The Panel has adopted a consistent approach in the present update.
5. The Panel has placed importance on the rule of consensus among the Panel members and agreed that, if differences and/or reservations arise during the development of reports, it would only adopt the text, conclusions and recommendations by a majority of four out of the five members. In the event of a recommendation for designation of an individual or a group, such recommendation would be done on the basis of unanimity.
6. The Panel has offered the opportunity to reply to Member States, entities and individuals involved in the majority of incidents that are covered in this update. Their response has been taken into consideration in the Panel's findings. The methodology for this is provided in appendix A.

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**Appendix A to Annex 1: ‘The opportunity to reply’ methodology used by the Panel**

1. Although sanctions are meant to be preventative not punitive, it should be recognized that the mere naming of an individual or entity<sup>1</sup> in a Panel’s public report, could have adverse effects on the individual. As such, where possible, individuals concerned should be provided with an opportunity to provide their account of events and to provide concrete and specific information/material in support. Through this interaction, the individual is given the opportunity to demonstrate that their alleged conduct does not fall within the relevant listing criteria. This is called the ‘opportunity to reply’.
2. The Panel’s methodology on the opportunity to reply is as follows:
  - (a) Providing an individual with an ‘opportunity to reply’ should be the norm;
  - (b) The Panel may decide not to offer an opportunity of reply if there is credible evidence that it would unduly prejudice its investigations, including if it would:
    - (i) Result in the individual moving assets if they get warning of a possible recommendation for designation;
    - (ii) Restrict further access of the Panel to vital sources;
    - (iii) Endanger Panel sources or Panel members;
    - (iv) Adversely and gravely impact humanitarian access for humanitarian actors in the field; or
    - (v) For any other reason that can be clearly demonstrated as reasonable and justifiable in the prevailing circumstances.
3. If the circumstances set forth in 2 (b) do not apply, then the Panel should be able to provide an individual an opportunity to reply.
4. The individual should be able to communicate directly with the Panel to convey their personal determination as to the level and nature of their interaction with the Panel.
5. Interactions between the Panel and the individual should be direct, unless in exceptional circumstances.
6. In no circumstances can third parties, without the knowledge of the individual, determine for the individual its level of interaction with the Panel.
7. The individual, on the other hand, in making their determination of the level and nature of interaction with the Panel, may consult third parties or allow third parties (for example, legal representative or his government) to communicate on his/her behalf on subsequent interactions with the Panel.

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<sup>1</sup> Hereinafter just the term individual will be used to reflect both individuals and entities.

**Appendix B to Annex 1: Violations relating to IHL, IHRL, and acts that constitute human rights abuses investigative methodology**

1. The Panel adopted the following stringent methodology to ensure that its investigations met the highest possible evidentiary standards, despite it being prevented from visiting many places in Yemen. In doing so it has paid particular attention to the “Informal Working Group on General Issues of Sanctions Reports”, [S/2006/997](#), on best practices and methods, including paragraphs 21, 22 and 23, as requested by paragraph 11 of resolution 2456(2019).
2. The Panel’s methodology, in relation to its investigations concerning IHL, IHRL and human rights abuses, is set out as below:
  - (a) All Panel investigations are initiated based on verifiable information being made available to the Panel, either directly from sources or from media reports.
  - (b) In carrying out its investigations on the use of explosive ordnance, the Panel relies on at least three or more of the following sources of information:
    - (i) At least two eyewitnesses or victims;
    - (ii) At least one individual or organization (either local or international) that has also independently investigated the incident;
    - (iii) If there are casualties associated with the incident, and if the casualties are less than ten in number, the Panel obtains copies of death certificates and medical certificates. In incidents relating to mass casualties, the Panel relies on published information from the United Nations and other organizations;
    - (iv) Technical evidence, which includes imagery of explosive events such as the impact damage, blast effects, and recovered fragmentation. In all cases, the Panel collects imagery from at least two different and unrelated sources. In the rare cases where the Panel has had to rely on open source imagery, the Panel verifies that imagery by referring it to eyewitnesses or by checking for pixilation distortion;
      - a. In relation to air strikes, the Panel often identifies the responsible party through crater analysis or by the identification of components from imagery of fragmentation; and
      - b. The Panel also analyses imagery of the ground splatter pattern at the point of impact from mortar, artillery, or free flight rocket fire to identify the direction from which the incoming ordnance originated. This is one indicator to assist in the identification of the perpetrator for ground fire when combined with other information.
    - (v) The utilization of open source or purchased satellite imagery wherever possible, to identify the exact location of an incident, and to support analysis of the type and extent of destruction. Such imagery may also assist in the confirmation of timelines of the incident;
    - (vi) Access to investigation reports and other documentation of local and international organizations that have independently investigated the incident;
    - (vii) Other documentation that supports the narrative of sources, for example, factory manuals that may prove that the said factory is technically incapable of producing weapons of the type it is alleged to have produced;
    - (viii) In rare instances where the Panel has doubt as to the veracity of available facts from other sources, local sources are relied on to collect specific and verifiable information from the ground. (For example, if the Panel wished to confirm the presence of an armed group in a particular area);
    - (ix) Statements issued by or on behalf of a party to the conflict responsible for the incident; and/or
    - (x) Open source information to identify other collaborative or contradictory information regarding the Panel’s findings.
  - (c) In carrying out its investigations on deprivation of liberty and associated violations the Panel relies on the following sources of information:
    - (i) The victims, where they are able and willing to speak to the Panel, and where medical and security conditions are conducive to such an interview;

- (ii) The relatives of victims and others who had access to the victims while in custody. This is particularly relevant in instances where the victim dies in custody;
  - (iii) Interviews with at least one individual or organization (either local or international) that has also independently investigated the incident;
  - (iv) Medical documentation and, where applicable, death certificates;
  - (v) Documentation issued by prison authorities;
  - (vi) Interviews with medical personnel who treated the victim, wherever possible;
  - (vii) Investigation and other documentation from local and international organizations that have independently investigated the incident. The Panel may also seek access to court documents if the detainee is on trial or other documentation that proves or disproves the narrative of the victim;
  - (viii) Where relevant, the Panel uses local sources to collect specific and verifiable information from the ground, for example, medical certificates;
  - (ix) Statements issued by the party to the conflict responsible for the incident; and/or
  - (xx) Open source information to identify other collaborative or contradictory information regarding the Panel's findings.
  - (xxi) Detainees do not have always access to medical care, nor is it always possible to obtain medical reports, especially in cases of prolonged detention. Therefore, the Panel accepts testimonies received from detainees alleging that violence was used against them during detention by the detaining parties as prima facie evidence of torture.
  - (xxii) For the same reasons, medical and police reports are not required by the Panel to conclude that rape or sexual violence took place.
- (d) In carrying out its investigations on other violations, including forced displacement and threats against medical workers, the Panel relies on information that includes:
- (i) Interviews with victims, eyewitnesses, and direct reports where they are able and willing to speak to the Panel, and where conditions are conducive to such an interview;
  - (ii) Interviews with at least one individual or organization (either local or international) that has also independently investigated the incident;
  - (iii) Documentation relevant to verify information obtained;
  - (iv) Statements issued by the party to the conflict responsible for the incident; and/or
  - (v) Open source information to identify other collaborative or contradictory information regarding the Panel's findings.
- (e) The standard of proof is met when the Panel has reasonable grounds to believe that the incidents had occurred as described and, based on multiple corroboratory sources, that the responsibility for the incident lies with the identified perpetrator. The standard of proof is "beyond a reasonable doubt".
- (f) Upon completion of its investigation, wherever possible, the Panel provides those responsible with an opportunity to respond to the Panel's findings in so far as it relates to the attribution of responsibility. This is undertaken in accordance with the Panel's standard methodology on the opportunity to reply. Generally, the Panel would provide detailed information in any opportunity to respond, including geo-locations. However, detailed information on incidents are not provided when there is a credible threat that it would threaten Panel sources, for example, in violations related to deprivation of liberty, violations associated with ground strikes on a civilian home, or in violations associated with children.
- (g) If a party does not provide the Panel with the information requested, the Panel will consider whether this is of sufficient gravity to be considered as non-compliance with paragraph 8 of resolution 2456 (2019) and thus consideration for reporting to the Committee.

3. The Panel will not include information in its reports that may identify or endanger its sources. Where it is necessary to bring such information to the attention of the Council or the Committee, the Panel will deposit such information in the custody of the Secretariat for viewing by members of the Committee.

4. The Panel will not divulge any information that may lead to the identification of victims, witnesses, and other particularly vulnerable Panel sources, except: 1) with the specific permission of the sources; and 2) where the Panel is, based on its own assessment, certain that these individuals would not suffer any danger as a result. The Panel stands ready to provide the Council or the Committee, on request, with any additional imagery and documentation to support the Panel's findings beyond that included in its reports. Appropriate precautions will be taken though to protect the anonymity of its sources.



**Annex 3. Summary of Panel correspondence (2019)**

Table 3.1  
**Correspondence with Member States**

<i>Ser.</i>	<i>Member State</i>	<i>Number of letters sent by the Panel</i>	<i>Number of unanswered letters by Member State</i>	<i>Number of letters for which the response is due after 25 December 2019</i>
1	Australia	1		
2	Bahrain	1	1	
3	Belarus	2		
4	Brazil	1		
5	China	5	5	
6	Czech	7		
7	Djibouti	1	1	
8	Egypt	1		
9	Germany	1		
10	Greece	1		
11	Iran	5		
13	Ireland	2	1	
14	Italy	3		
15	Japan	4	1	
16	Jordan	1	1	
17	Korea	1	1	
18	KSA	18	8	Interim responses provided to 05 of the 08 outstanding letters.
19	Kuwait	2	1	
20	Oman	5	4	
21	Pakistan	1		
22	Sudan	1	1	
23	Sweden	2		
24	Switzerland	1	1	
25	Thailand	2		
26	UAE	8	3	An extension to reply requested for 01 of 03 outstanding letters.
27	USA	3		
28	Yemen	23	11	
<b>28</b>		<b>103</b>	<b>40</b>	

Table 3.2  
**Correspondence with Sana'a based authorities**

<i>Entity</i>	<i>Number of letters sent by the Panel</i>	<i>Number of unanswered letters by entity</i>	<i>Remarks</i>
1	Sana'a based ministry of foreign affairs	4	4
2	CBY, Sana'a branch	2	2
3	NAMCHA	1	1
<b>3</b>		<b>7</b>	<b>7</b>

Table 3.3  
Correspondence with international and regional organizations

<i>Ser.</i>	<i>Organization</i>	<i>Number of letters sent by the Panel</i>	<i>Number of unanswered letters</i>	<i>Remarks</i>
1	Masam	1		
2	Resident Coordinator Yemen	1	1	
3	Safelane	1	1	
4	Save the children	1		
5	UNDP	2		
6	UNICEF	1	1	
7	WFP	3	1	
<b>7</b>		<b>10</b>	<b>4</b>	

Table 3.4  
Correspondence with Companies

<i>Ser.</i>	<i>Company</i>	<i>Number of letters sent by the Panel</i>	<i>Number of unanswered letters</i>	<i>Remarks</i>
1	Alswari	1		
2	Analog device	1	1	
3	Aviationeu	1		
4	BD Sensors	1	1	
5	Excell	1		
6	General Electric	1	1	
7	Glencoe	1	1	
8	IBY	3	1	
9	Kuraimi	1		
10	Leo Shipping	1		
11	R Shipping	1		
12	Sasco	1		
13	TIIB	3		
14	Maccon	2		
15	YKB	1		
16	TI Automotive	1	1	
<b>16</b>		<b>21</b>	<b>6</b>	

Table 3.5  
Correspondence with Individuals

<i>Ser.</i>	<i>Name</i>	<i>Number of letters sent by the Panel</i>	<i>Number of unanswered letters</i>	<i>Remarks</i>
1	Hafedh Mayad (CBY)	1		
2	Mohamed Zemam (CBY)	1		
<b>2</b>		<b>2</b>		

**Annex 4. Information on preventative security**

**CONFIDENTIAL ANNEX NOT FOR PUBLIC DISSEMINATION**

## Annex 5. Opposition to dissent in Houthi controlled areas against women

### I Methodology for the documentation of rape and other violence against women

1. The Panel complements herein the methodology adopted in annex I to this report. The Panel conducted bilateral and in-person interviews with eight women who were arrested and detained by the Houthis.<sup>2</sup> The Panel further had phone interviews with three women following their release from custody.
2. In cases of rape and torture, the Panel received copies of medical records that support the testimonies which are now in the Panel's possession,<sup>3</sup> and observed marks of torture on some of the women who had been subjected to cuts or burns using electricity and flammable items. The Panel was also able to obtain independent verification of some of the locations where the women were held, the identifying information on the perpetrators at those locations, and the circumstances of arrest. The Panel also relied on official media of the Houthis to attribute statements to the Houthi-controlled authorities.
3. The incidents reflected in this annex fall within the Panel's mandate and within the designation criteria of resolutions 2140 (2014) and 2216 (2015). The women were targeted because of their political opinions or participation in dissent, which may constitute a threat to peace, security and stability of Yemen and those responsible engaged in violence that amounts to violations of human right and humanitarian law, for example by engaging in sexual violence, arbitrary arrest and detention or torture. The Panel also finds that the designation criteria are met with respect to the arbitrary arrest and detention of women in the context of providing humanitarian assistance

### II Background information

4. Traditionally, in Yemeni society, women were largely immune from search, arrest, and detention. As a result, when the war commenced the women in both the Northern and Southern governorates were at the forefront as human rights defenders, as mothers and relatives of detainees searching their whereabouts, and as leading protests. As men were increasingly targeted for activism on political and human rights-related issues, women started bridging the gap.
5. In Houthi-controlled territory, women are targeted both directly and indirectly when they are, or perceived to be, a threat to the Houthi rule, either because of their political affiliations, political opinion, expression or participation;<sup>4</sup> their expression of dissent against Houthi policies and practices, or against its leaders;<sup>5</sup> or their perceived support to, and from, the Saudi Arabia-led Coalition;<sup>6</sup> or their standing in the community as influencers, activists, artists, and others able to create dissent; and, finally, any women who are perceived as being in alliance with any of the above-mentioned categories of women.
6. The Panel has observed in 2019, that the Houthis have begun to indirectly target those engaged in protection<sup>7</sup> or humanitarian activities aimed exclusively at women.

<sup>2</sup> In addition, the Panel conducted in-person interviews with some of the individuals to whom these women had given their testimonies to verify their detentions.

<sup>3</sup> In accordance with the methodology of the Panel, for victims of rape and torture, the Panel does not consider contemporaneous medical evidence as a pre-requisite to identify rape or torture, in particular when the women or men are in prolonged custody of the detaining authorities at the time of the rapes and/or torture. In these cases, these individuals are either provided no treatment, or treatment is provided in hospitals under the control of the detaining authorities, which makes it impossible to obtain these medical reports. However, **in all three cases documented by the Panel, the women provided the Panel with medical reports and other evidence of the treatment of trauma associated with rape, obtained following their release.**

<sup>4</sup> Seven women documented by the Panel supported Ali Abdullah Saleh or the General People's Congress (GPC).

<sup>5</sup> One woman was arrested and sexually assaulted in custody for criticizing human rights abuses committed by a prominent Houthi leader. Two, were arrested for protesting the non-payment of salaries.

<sup>6</sup> Four women interviewed by the Panel were accused of providing intelligence to the Saudi Arabia-led Coalition, and one was accused of receiving money from the Coalition, possibly to incite protests. One woman, who was arrested and since disappeared, was accused of receiving humanitarian assistance from the Saudi Arabia-led Coalition, because she distributed this assistance without informing the Houthis. This last woman is not included in the 11 women documented below, because the Panel did not have access to her as she was 'disappeared' by the Houthis.

<sup>7</sup> The Panel documented the arrest of lawyers, brother/s and sisters of three individuals arrested. The detentions of sisters were used to pressure detainees to provide information.

### III Reasons for arrest and detention

7. In 2019, the Panel gathered evidence on the arrest, detention, and ill treatment of 11 women, from 2017 to 2019, and received further information on four women who were arrested in the latter half of 2019. The 11 women, mentioned above, were arrested, detained, tortured or raped in Houthi custody for their political participation and views. The Panel also documented the arrest and detention of one man for his participation in a political protest.

8. Based on interrogation questions, it appeared that violence against all 11 women was perpetrated because of their political activism or political views, or because they participated in demonstrations. These included:

- 1) Protests organized in 2017 and before the death of Ali Abdullah Saleh calling for peace negotiations with the Kingdom of Saudi Arabia.<sup>8</sup>
- 2) Protests in December 2017 and January 2018 demanding the return of the body of the former President Ali Abdullah Saleh (Yei003).
- 3) Gathering on 18 March 2018 (“the march of roses”) to commemorate the death of the former President.<sup>9</sup>
- 4) Gathering on 6 October 2018 (“starvation march”) to protest food insecurity in Houthi-controlled areas.<sup>10</sup>
- 5) Actual or perceived affiliations with General Congress Party or ISLAH, or women who expressed dissent against the Houthis.

9. The Panel also received information about three further arrests<sup>11</sup> and one release<sup>12</sup> of women between July and December 2019. The women were arrested for critiquing the Houthis; distributing humanitarian assistance allegedly provided by the Coalition; and for perceived refusal to indoctrinate students to Houthi ideology. Therefore, there is clear indication that these arrests and detention of women still continue.

### IV Links to prostitution

10. Labelling women as prostitutes or criminals serves at minimum three purposes: It deters families from searching for and protesting the disappearance of the women due to the associated shame; It allows officials to conduct arrests, detentions and violations of these women with impunity; and The threat of being labelled deters these and additional women from participating in political activity or other forms of dissent.

11. In a televised documentary<sup>13</sup> the Houthis justify their reasons for arresting the so-called prostitution networks. They argue this is on the basis of enforcing societal morals, because these “prostitutes” are being used for criminal activities, and Houthi enemies are using them to undermine Houthi authority. None of the women interviewed by the Panel were arrested for “prostitution” and a majority were arrested during or immediately after public protests against the Houthis, thus demonstrating a direct link between protests and arrests. It was only following these arrests that the Houthis threatened to label some of these women as prostitutes.<sup>14</sup> For example, one woman interviewed by the Panel was told that unless she provided information she would be charged with prostitution and organ trafficking. When the family of another woman searched for information on her whereabouts, the family was told that she was a prostitute allegedly to deter them from continuing to search for her.

12. In two other incidents, women were told that they would be safe from prostitution or any other charges if they protested in demonstrations organized by the Houthis; and if they worked for the Houthis in gathering information on other individuals. In two other cases, Houthis obtained signed statements prior to release, that the women would not engage in protests against the Houthis.

<sup>8</sup> Two women interviewed by the Panel.

<sup>9</sup> <https://gulfnews.com/world/gulf/yemen/al-houthis-disperse-pro-saleh-rally-in-sanaa-1.2192427>

<sup>10</sup> Images with Panel.

<sup>11</sup> The Panel received information on these women from activists and the arrests were reported in the media. The whereabouts of these three women are currently unknown.

<sup>12</sup> The Panel received the testimony of this women immediately upon her release. However, as the woman is still under significant danger, information on her situation will not be further elaborated in this annex.

<sup>13</sup> [https://www.almasirah.net/gallery/preview.php?file\\_id=25211](https://www.almasirah.net/gallery/preview.php?file_id=25211)

<sup>14</sup> In what appear to be attempts to substantiate claims of prostitution, detaining authorities took naked pictures of two women interviewed by the Panel in compromising positions and threatened to expose these women as prostitutes, if they engaged in further “disobedience”.

13. The Panel has also received documentary evidence to support the above claims on arbitrary arrest and detention of women, see confidential annex 6.

## V Rape as a Form of Violence Against Women in Houthi Detention

14. The Panel documented three cases of women raped during detention. Of the three women raped, two were asked to recite a prayer prior to the rape. This was a method of purification of the women, according to the perpetrators. One woman was raped in her room in a private house appropriated by the Houthis, and the other two were taken from the basement of the building in which they were detained to another floor by the women guards. Initially, as the women resisted rape, the women prison guards assisted to restrain the women. The women were subjected to rape by one to three men over a period of months.

15. The Panel was informed that women who became pregnant as a result of the rapes were forced to undergo abortions, either by taking pills provided by the Houthis or at a hospital.<sup>15</sup>

## VI Places of Detention of Women

16. The women were held in at least three types of places of detention: under house arrest;<sup>16</sup> in police stations and formal prisons;<sup>17</sup> and in places of detention undisclosed to the public (undisclosed detention centers).<sup>18</sup>

17. The Panel noted that the circumstances of detention and interrogation practices increase the likelihood of sexual abuses. This risk is increased when women are detained in secret places. The Panel was informed of possible locations of three secret places of detention exclusively for women, where 10 – 20 women were held at the same time, for the above reasons. One such place was identified as a private home of a Houthi-opponent who fled Houthi territory. According to evidence thus far gathered by the Panel, the occurrence of sexual abuses, including rape, is higher in relation to women in secret places of detention when compared to official detention locations.<sup>19</sup> Yet, even in these locations, the Panel does not discount the possibility of sexual abuse, as two women reported being taken individually, after midnight, for interrogation, by male officers.<sup>20</sup>

## VII Identified Perpetrators

1) The Panel documented the following perpetrators:

### Figure 2:

Image of Sultan Zabin in the Houthi documentary relating to prostitution.



Source: [https://www.almasirah.net/gallery/preview.php?file\\_id=25211](https://www.almasirah.net/gallery/preview.php?file_id=25211)

<sup>15</sup> Information provided by the women in detention centers. None of the women interviewed by the Panel were subjected to abortions. The Panel cannot independently verify outside these testimonies.

<sup>16</sup> Two women were held under house arrest and in the case of Hashmi women, who are perceived as affiliated with the Houthis, they are more likely to be kept under house arrest when they express dissent, than to be taken to a detention center.

<sup>17</sup> This included al Afifi police station.

<sup>18</sup> Confidential annex 6.

<sup>19</sup> Lawyers, human rights investigators, and women detainees.

<sup>20</sup> Confirmed by documentary evidence with the Panel. Evidence obtained by the Panel indicates that this maybe contrary to Yemeni law. See confidential annex 06.

### Sultan Zabin:

18. Zabin is the director of CID, Sana'a. He was responsible for at least one undisclosed detention center for women, in an identified location.<sup>21</sup> The Panel has evidence that at least one woman was raped in this location, with reports of others also being raped. He directly inflicted torture.<sup>22</sup> Under his supervision, the CID appears to be in charge of curbing "prostitution" in Sana'a.<sup>23</sup> In a televised documentary, he stated that he had apprehended 28 prostitution networks involved in drugs, looting and other crimes.<sup>24</sup> In early 2019, a request for his arrest was transmitted, amongst other charges, because of his involvement in maintaining an undisclosed detention center for women.<sup>25</sup> He remains in office. The Panel received further evidence of his involvement in other human rights and humanitarian law violations, that will be presented in a confidential annex.<sup>26</sup>

### VIII Other identified Houthis

19. In the crackdown of the so called "prostitution" networks, Zabin has admitted to working closely with the prosecution and other security entities, see confidential annex 6. Abdulhakim al Khiyawani, the then deputy minister of interior, and current head of the security and intelligence bureau, highlighted the "powerful" relationships between the ministry of interior, security systems, prosecution and supreme judicial council in these arrests and detentions (identified networks of Sultan Zabin are at appendix i).<sup>27</sup>

### IX Preventative Security

20. A preventative security officer identified by his *nom de guerre* in the "preventative security" intelligence apparatus, sexually assaulted a woman and held her under arrest.<sup>28</sup> The Panel continues to investigate.

### X Female perpetrators

21. In addition, unidentified female Houthi guards, identified as zainabiyath, aided and abetted the commission of rape by holding down women and engaged in torture of women, including during interrogations.

### XI Protection issues

22. In view of the pervasive allegations of arbitrary arrests and detentions, sexual violence and torture, the Houthi leadership, including the minister and other senior officials the ministry of interior, that holds supervisory authority of the security forces and CID, should immediately launch an investigation into these and other open source multiple allegations concerning violations against women.

23. The fact that some women are detained in private houses instead of official detention centers increase the possibility that their location maybe targeted by airstrikes or they may be subject to other attacks by opposing parties due to the presence of Houthis and Houthi leaders in these places, as reported by the Panel's sources. Sultan Zabin, for example, was present in one of these identified undisclosed detention centers for a period of more than a week.<sup>29</sup>

<sup>21</sup> Confidential annex 6.

<sup>22</sup> More information in a confidential annex to prevent the identity of women.

<sup>23</sup> Documentary evidence with Panel.

<sup>24</sup> [https://www.almasirah.net/gallery/preview.php?file\\_id=25211](https://www.almasirah.net/gallery/preview.php?file_id=25211)

<sup>25</sup> Confidential annex 6.

<sup>26</sup> The Panel was informed by multiple sources that Sultan Zabin was arrested for his alleged involvement in sexual violations against women in 2018, detained for a few months and was subsequently released. The Panel continues to investigate.

<sup>27</sup> Two Houthi officers identified by name, and 4 officers identified by their *nom de guerre*.

<sup>28</sup> Further information is not provided to protect the identity of the woman.

<sup>29</sup> The Panel notes for example, in justifying its attacks on the Dhammar community college, the Coalition stated that the location was not on the no-strike list (see final report of the Panel). While the presence or not of civilian infrastructure in these so called "deconflicted lists" does not exempt the parties in their obligations to undertake the relevant precautionary measures, the Panel highlights the near impossibility of these undisclosed detention sites being entered into a no-strike-list. These undisclosed sites are by their nature secret.

24. The Panel is not aware if humanitarian organizations have visited these sites, however, it is clear that none visited during the detention of the women documented in this report.

25. The Houthis should facilitate humanitarian access to identified locations, at minimum, and ensure that the conditions of detention of women detainees are as required by law and that their detaining authorities respect IHL and human rights norms, including access to medical care and communication with families. This would also facilitate the deconfliction of all places of detention to provide some *prima facie* protection from direct attack.

## **XII Obstruction to humanitarian assistance directed at women**

26. In 2019, the Panel documented 2 cases of women arrested and detained by Houthis because they were working on women empowerment projects with NGOs. The Panel also received several testimonies from humanitarians confirming that projects related to women, peace and security or to women empowerment are generally not approved by Houthi authorities. The Panel continues to investigate.

## **XIII Responsibility of Houthi commanders and superiors in Sexual and Gender-based Violence Against Women**

27. The Panel, based on the interviews with the 11 woman and other information, concludes that there is possible targeting of women who are perceived as Houthi dissenters. This may also include women working for NGOs on women's empowerment projects in areas controlled by Houthis. Some of the sexual and gender-based violations documented by the Panel may amount to war crimes. Under superior responsibility, Houthi hierarchy, may be held responsible if not for ordering such violations, then for their failure to prevent, repress and report war crimes.<sup>30</sup> Given the high level admissions on the nature of the relationships between the ministry of interior, criminal investigation department, prosecution, ministry of justice, and supreme judicial/legal counsel,<sup>31</sup> the Panel finds that all of these authorities have a responsibility to investigate allegations associated with these violations and the potential involvement of their officials in these violations. This responsibility is particularly strong on the ministry of interior, under whose authority the CID operates.

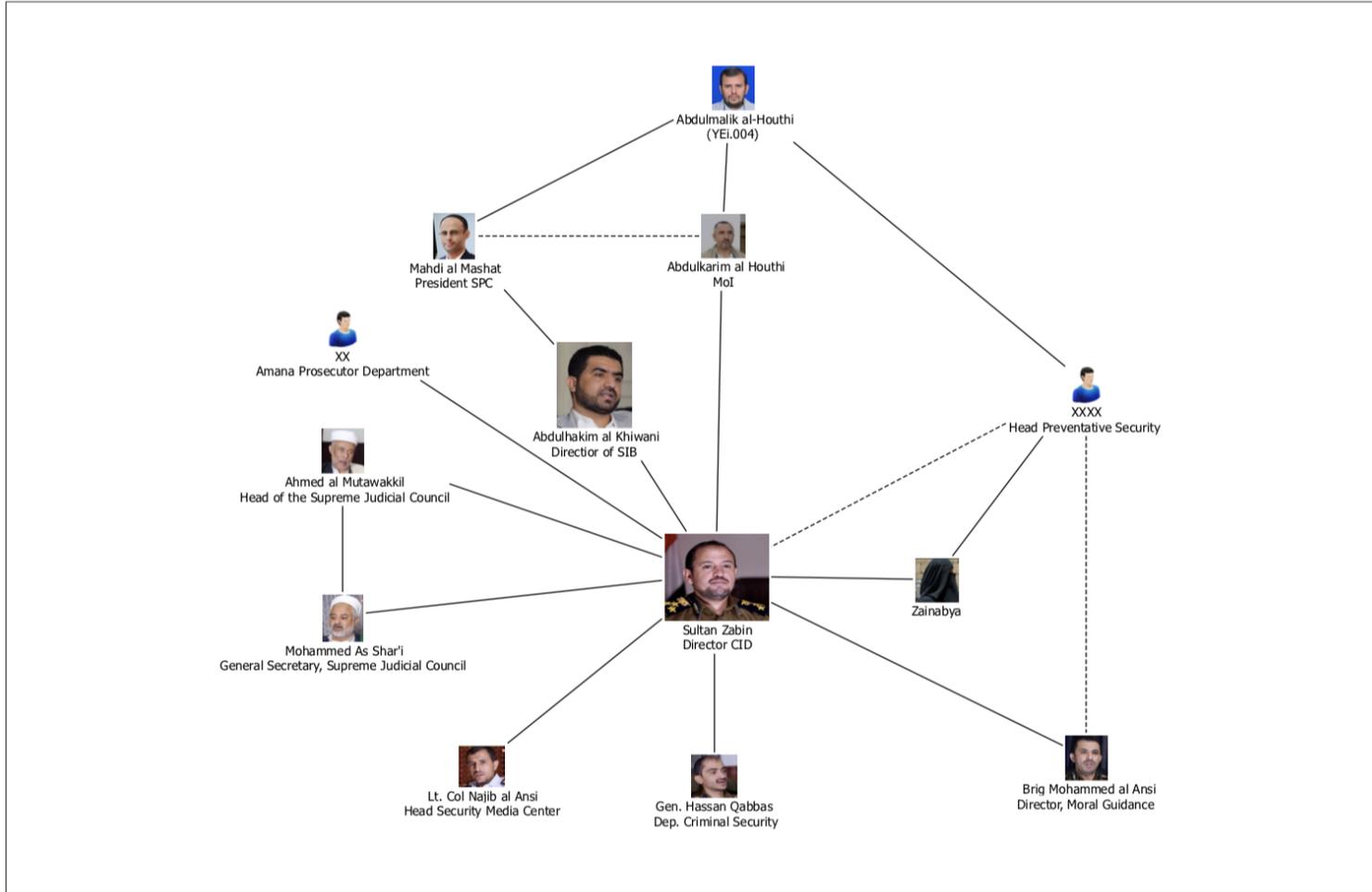
28. The Panel notes the statements of Abdulhakim al Khiyawani stating that “there is a strong relationship between the ministry of interior and the prosecution and between the security systems and the higher law council and the ministry of justice. The security systems do not implement any security procedures in the field unless being directed by the higher law council and prosecution and this is well noticed.”<sup>32</sup> The Panel continues to investigate.

<sup>30</sup> CIHL rules 152 and 153.

<sup>31</sup> [https://www.almasirah.net/gallery/preview.php?file\\_id=25211](https://www.almasirah.net/gallery/preview.php?file_id=25211)

<sup>32</sup> [https://www.almasirah.net/gallery/preview.php?file\\_id=25211](https://www.almasirah.net/gallery/preview.php?file_id=25211)

Appendix I: Network and affiliations associated with Sultan Zabin



Source: Panel

## Appendix 2: Summary of violations

The 11 women and one man interviewed by the Panel were subjected to following violations either during the protests or at the time of arrest, or during their detentions:

	Arbitrary arrest	Arbitrary detention	Torture	Ill treatment	Rape	Threat of sexual violence	Sexual abuse not rape	Forced labor	Verbal Abuse
W1	Y	Y		Y					
W2	Y	Y		Y		Y	Y		Y
W3	Y	Y		Y		Y			
W4	Y	Y		Y		Y			Y
W5				Y		Y			Y
W6	Y	Y	Y	Y	Y	Y	Y		Y
W7	Y	Y	Y	Y	Y	Y	Y	Y	Y
W8	Y	Y	Y	Y	Y	Y	Y	Y	Y
W9	Y	Y		Y					Y
W10	Y	Y		Y					Y
W11	Y			Y					Y
M1	Y	Y		Y					Y

**Annex 6. Further evidence on involvement of Sultan Zabin in violations**

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## Annex 7. Significant Houthi appointments in 2019

**Table 7.1**  
Significant Houthi appointments in 2019

Position	Name	Dates of service	Predecessor
Head of national security bureau	Fawaz Hussein Nashwan	18 February 2019 to August 2019	Abdul Rahab Jarfan (Abu Taha)
Minister of interior	Abdul Karim Amir al-Din al-Houthi <sup>33</sup>	05 May	Abdul Hakim Maweri
Head of national authority for the management and coordination of humanitarian affairs and disaster response (NAMCHA)	Abdul Abdullah Attawoos Adel <sup>34</sup>	Mohsen Qasim (Abu Adel) <sup>34</sup> Around 06 July 2019 – November 2019	NA as new organization
Member of the SPC	Mohammed Ali al Houthi	30 July	NA
Head of security and intelligence bureau	Abdul Hakim al Kiyawani <sup>35</sup>	1 September	NA as new organization
Deputy head of security and intelligence bureau	Abdulqader Al-Shami	1 September	NA as new organization
Extraordinary and plenipotentiary ambassador to Iran	Ibrahim al Dailami	Late August 2019	
Governor of CBY Sana'a	Dr Rashid Aboud Shiryan Abu-Lahem <sup>36</sup>	25 August	
Advisor to SPC	Mohammed Ahmed Ahmed Moftah	25 September	NA
Advisor to the president with the rank of deputy prime minister	Hashim Ismail Ali Ahmed	06 October 2019	
Secretary general of the supreme council for administration and coordination of humanitarian affairs and international cooperation	Abdul Abdullah Attawoos Adel)	Mohsen Qasim (Abu Adel) November 2019	NA as new organization around 06 November by SPC decree 201 of 2019.

<sup>33</sup> SPC decree 90 of 2019.

<sup>34</sup> Tawoos was the former general supervisor (musharaf) of Dhammar. A general supervisor is usually at the rank of the governor and supervises the functions of the governor and also security matters. The Panel received information that he was dismissed from his position for his involvement in misappropriation of governate revenues, and threats against traders, while in Dhammar (see also <https://aawsat.com/home/article/1122366/الخبفي-الحوثي-سلاح-الوقائي-الامن>). He was with the Houthis since 2004, during the conflicts it had with the GoY. GPC sources informed the Panel that he was involved in the death of Ali Abdullah Saleh.

<sup>35</sup> [https://english.almasirah.net/details.php?es\\_id=8561&cat\\_id=1](https://english.almasirah.net/details.php?es_id=8561&cat_id=1).

<sup>36</sup> He was appointed as finance minister on 26 February 2019, see <https://sabaanews.net/news527745.htm>.

## Annex 8. Proliferation of armed groups in Yemen

### I Terminology

1. Armed groups can either be State or a non-State armed group (NSAG). A State armed group can be defined as an entity that is an organ of a State according to its internal law and regulation.<sup>37</sup> The Panel notes the lack of a uniform definition for non-State armed groups under international law. For the purposes of this annex, this can include tribal or other armed groups, organized military units, and terrorist groups.

2. “Government of Yemen-affiliated forces”, “UAE-affiliated forces” or “KSA-affiliated forces” mean that forces that are affiliated to these States. These affiliations can range from the payment of salaries, to the provision of training, logistical and administrative support, provision of weapons and training, providing instructions and supervision of specific missions, to complete command and control over each military decision being taken by these forces. In each case, the types of responsibility of these States over the conduct of these forces differ in accordance with the level of command and control exercised over them. The uncontrolled proliferation of different armed groups within Yemen, with multiple affiliations, is a threat to peace, security, and stability of Yemen.

### II Proliferation of armed groups and affiliations

3. As will be demonstrated below, the narrative that there are clear divisions in the lines of State command and control over the forces in Yemen, is false. A case in point is the shifting of Security Belt Forces (SBF) alliances and claims of alliances between 2016 – 2019.

**Table 8.1**  
SBF and their affiliations

Dates	Claims of Command and Control over SBF	Actual Affiliations of SBF
2016	President Hadi appoints commanders by official decree in April 2016, according to the internal laws of Yemen, <sup>38</sup> thus, making them a military unit under the GoY, under the command of the 4 <sup>th</sup> military axis.	GoY sources inform the Panel that UAE selected the commanders and President Hadi appointed them by decree. GoY military sources informed the Panel that the UAE was making the decisions on the recruitment and incorporation of individuals into the SBF. <sup>39</sup> Yet, the GoY officially claimed at the time, that SBF were GoY State organs.
2016 – 07 August 2019	GoY and the UAE state that they are under the operational control of the GoY, <sup>40</sup> (see below for an exception to this GoY position presented in March 2018). UAE provides only training and logistical support in counter-terrorism operations.	During this period, SBF were not under the operational control of the GoY. <sup>41</sup> The Panel received evidence that specific military operations were either conducted jointly or that persons arrested by SBF were immediately transferred to the UAE, in a manner that demonstrated a degree of operational control, at minimum for specific operations. <sup>42</sup> SBF informed the Panel that they received instructions and orders from the UAE, especially in relation to arrest and detention operations of alleged AQAP members. <sup>43</sup>

<sup>37</sup> An organ of a State “includes any person or entity which has that status in accordance with the internal law of the State.” Article 4 of Draft Articles on Responsibility of States for Internationally Wrongful Acts.

<sup>38</sup> Decree No 53 of 2016 issued on 18 April 2016.

<sup>39</sup> Sources: GoY, SBF, and GoY-military in Aden. GoY letter to Panel on 04 October 2019.

<sup>40</sup> See Panel Reports, S/2018/193, S/2018/594, S/2019/83. Panel meeting with UAE in October 2019.

<sup>41</sup> Ibid.

<sup>42</sup> See also current report of the Panel of Experts.

<sup>43</sup> Confidential sources.

March 2018	GoY claims that they have no command and control over SBF but does not provide information on who does (makes no mention of the UAE as exercising command and control). <sup>44</sup>	
May 2018 – June 2019	GoY informs the Panel that these forces are once again under its complete command and control and measures have been taken to legally incorporate it into the GoY. <sup>45</sup> The Panel requested but did not receive any documentation or other proof that the GoY was now paying their salaries, as was claimed. The GoY denied UAE involvement, except for training.	The above.
August 2019	SBF operationally affiliates themselves to the STC. SBF drops any pretenses to be a part of GoY.	STC exercises operational control over these forces in its attempts to take control over Aden and the South from the GoY.
28 and 29 August 2019	UAE launches air strikes. UAE informed the Panel that the air strikes were because of the activation of some dormant terrorist cells and the threat that it posed to the Coalition. <sup>46</sup>	The consequences were for the benefit of the STC-affiliated troops, including the SBF, as the GoY was attempting to regain control over Aden from the STC-affiliated SBF when the air strikes occurred.
September 2019	GoY informs the Panel that SBF had never been under its operational control, but that of the UAE. GoY states that the UAE appoints SBF commanders and give instructions and orders. <sup>47</sup>	
05 November 2019	KSA assumes direct supervision of SBF and other forces until they are incorporated into the Ministry of Defence of Yemen.	STC continues to exercise operational control over what is now considered as STC-affiliated forces.

<sup>44</sup> Letter to the Security Council on March 2018.

<sup>45</sup> Interview with Ministry of Interior Officials in Aden, May 2018 and June 2019

<sup>46</sup> The UAE stated in its letter to the Panel on 19 December 2019, that "... in response to threats against Coalition forces, two precision air strikes were launched on 28 and 29 August 2019, in Al Alam area. The first strike was a warning strike. The military operation was based on credible intelligence which indicated that terrorist elements, namely AQAP, intend to execute terrorist attacks against the Arab Coalition forces within the security zone in Aden. On 29 August 2019, terrorist elements seized the Al Alam area and as a result, dormant terrorist cells in and around Aden were activated. The security cordon was penetrated and attacked, and two members of the Coalition forces were wounded... The operation was carried out in conformity with the Coalition's rules of engagement..."

<sup>47</sup> Meeting in Riyadh, including with representatives of the Ministries of Interior, Foreign Affairs, and Human Rights. This was followed by GoY letter dated 04 October 2019.

08 December 2019	KSA has assumed direct supervision of SBF until SBF incorporation into the Ministry of Defence.	Through the Riyadh Agreement, legally, KSA has assumed direct supervision of SBF. De facto, SBF continue to operate under the STC to the extend to prevent the 1 <sup>st</sup> PPB to return to Masheeq Palace as stipulated in the Riyadh Agreement (information as at 08 December 2019). <sup>48</sup>
19 December 2019	UAE informed the Panel that it denies exercising any kind of leadership over the SBF and expressed its full support for the implementation of the Riyadh Agreement. <sup>49</sup>	

4. This is only an example of how the shifting alliances of these forces make peace prospects difficult in Yemen, and why an understanding of these forces and their alliances is a mandatory pre-requisite for a durable solution to the conflict in Yemen. An assessment of linkages for these arms groups is also relevant for determining the extent of UAE and GoY responsibilities for human rights and humanitarian law violations committed by these forces. The following attempts to place some of these armed groups in context.

### III Typology of Prominent Armed Groups and Military Units in Yemen

5. Armed groups and military units that are affiliated to the Government in Yemen in 2019, included the following:

**Table 8.2**

GoY forces and their affiliations

Armed Group/ Military Unit	Affiliations in 2019
Presidential Protection Brigades (PPB)	Remained loyal to GoY through the events in Aden in August 2019. Commanders appointed by GoY.
GoY Regular Armed Forces, see annex 8 of S/2019/83	Remained loyal to GoY, but relies on KSA support for weapons, salaries and other logistical support.
Resistance Forces: for example, Al Baydah front groups.	Likely loyal to those providing salaries and military and logistical support. KSA provides support, including through the GoY.

Armed groups and military units affiliated to the UAE in Yemen, include the following:

**Table 8.3**

Armed groups and military units affiliated with the UAE on 01 June 2019

Name of Forces	Affiliations with UAE (as at 01 June 2019)	Other Affiliations
<b>SBF</b>	<ul style="list-style-type: none"> <li>See table above</li> </ul>	<ul style="list-style-type: none"> <li>See table above.</li> </ul>
<b>Shebwani Elite Forces (SEF)</b>	<ul style="list-style-type: none"> <li>UAE created at minimum seven Brigades of SEF (confidential annex), based on tribal and geographical affiliations.<sup>50</sup></li> </ul>	<ul style="list-style-type: none"> <li>None, except GoY claiming that these are GoY forces until September 2019 (with exception in March 2018).</li> </ul>

<sup>48</sup> Confidential sources within the PPB.

<sup>49</sup> Letter from UAE to Panel received on 19 December 2019.

<sup>50</sup> For this section, unless specified sources include: SEF, GoY (political and military) including in Shabwah. See also S/2018/193, S/2018/594, S/2019/83.

	<ul style="list-style-type: none"> <li>• Each group is subject to instructions and orders from the UAE.<sup>51</sup></li> <li>• UAE provides salaries, training and logistical support.<sup>52</sup></li> <li>• Conducted joint arrest/detention operations and detainee transfers with UAE.<sup>53</sup></li> </ul>	<ul style="list-style-type: none"> <li>• From August 2017, some units affiliated themselves with STC, but continued to receive salaries from UAE.<sup>54</sup></li> </ul>
<b>Hydrami Elite Forces (HEF)</b>	<ul style="list-style-type: none"> <li>• Formed in Mukalla by UAE.<sup>55</sup></li> <li>• Salaries, training and logistical support.<sup>56</sup></li> <li>• Coordinates detainee transfers.<sup>57</sup></li> <li>• Receive instructions and orders from the UAE.<sup>58</sup></li> </ul>	<ul style="list-style-type: none"> <li>• None, except for the GoY claims above.</li> <li>• There is no evidence to suggest that their affiliations to the UAE changed after the Aden events.</li> </ul>
<b>Abu al Abbas Forces</b>	<ul style="list-style-type: none"> <li>• UAE provided logistical support.<sup>59</sup></li> <li>• Local UAE leadership intervened in 2018 to protect military positions of Abu al Abbas.<sup>60</sup></li> </ul>	<ul style="list-style-type: none"> <li>• A battalion falling under the 35<sup>th</sup> Brigade but 35 Brigade said to have no command and control over Abu al Abbas. forces<sup>61</sup></li> </ul>
<b>West Coast Fighters</b>	<p>Guards of the Republic, Tihama and Giants:</p> <ul style="list-style-type: none"> <li>• UAE/ Coalition provides salaries, training, arms and logistical support.<sup>62</sup></li> <li>• UAE directs and controls all military operations in the West Coast, including deployment of forces.<sup>63</sup></li> <li>• UAE/ Coalition appoints leaders to the Joint Operations Room (confidential annex).<sup>64</sup></li> <li>• UAE leadership in Mocha resolves disputes between these forces and ensures coherence in military operations and coordination.<sup>65</sup></li> <li>• These forces have fundamental differences in approach to battle and opinions, and do not always trust each other. The UAE is crucial to keeping these forces united against the Houthis.<sup>66</sup></li> </ul>	<ul style="list-style-type: none"> <li>• For Amjad Khalid forces that were in the West Coast: stated to be exclusively under GoY support and control.</li> <li>• Some Amalika and Tihama brigades claim loyalty to GoY.</li> </ul>

7, Other changes to these groups in 2019, after 1 June 2019, are reflected in the main report.

<sup>51</sup> GoY letter to Panel dated 04 October 2019.

<sup>52</sup> UAE in its letter acknowledges training support only (19 December 2019).

<sup>53</sup> /2018/193, S/2018/594, S/2019/83 and current report.

<sup>54</sup> SEF sources. Information as at November 2019.

<sup>55</sup> GoY letter to Panel dated 04 October 2019.

<sup>56</sup> GoY letter to Panel dated 04 October 2019.

<sup>57</sup> S/2018/193.

<sup>58</sup> GoY letter to Panel dated 04 October 2019.

<sup>59</sup> Sources: 35<sup>th</sup> Brigade commanders, Abu al Abbas forces and Ta'izz military axis commanders.

<sup>60</sup> Document with Panel. Discussions with Yemeni commanders involved.

<sup>61</sup> Verified document with Panel. In discussions in October 2019, both Abu al Abbas Brigade and the 35<sup>th</sup> Brigade confirmed the above.

<sup>62</sup> West coast forces. GoY military and political sources.

<sup>63</sup> Ibid.

<sup>64</sup> Ibid.

<sup>65</sup> Ibid.

<sup>66</sup> Ibid. Civil society actors.

**IV Major Saudi-affiliated forces**

8. Armed groups and military units affiliated to the KSA in Yemen, include:
  - a. The Yemeni fighters on the KSA-Yemen borders. This includes, for the purposes of this annex, only the fighters on the Yemen side of the border, as the Panel continues to investigate if those on the Saudi side of the border function as an armed group, or as private contractors.
  - b. During the period of the implementation of the Riyadh agreement, all the GoY forces and the STC-affiliated forces in the South falls under the direct supervision of KSA.

**Annex 9. Names of individuals in identified armed groups**

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## Annex 10. The situation in Attaq, Shabwah (17 to 24 June 2019)

1. This incident was reported in the midterm update of the Panel. The Panel finds that the proximity of these clashes to the events in Aden in August 2019 and the level of collaboration between the STC and the SEF, makes these clashes relevant to understanding of the Aden incidents. For example, the Panel noted that the STC media on 18 May 2019, discusses the outcome of a meeting with the president of the STC and “all commanders” of the South. The conclusion of the meeting was that: “The meeting approved a number of important decisions and conclusions, including establishing combat and operational areas, military mobilization, unifying the command and control instruments, reinforcing all military fronts and creating a unified and integrated operations room for all southern security and military sectors.”<sup>67</sup> In June 2019, in the aftermath of these clashes, the Shebواني Elite Forces (SEF) informed the Panel that they envisage a unification of all southern forces, including the SEF and the Security Belt Forces (SBF).<sup>68</sup>

### I. Background to the escalation of tensions in Attaq

2. Attaq is in Shabwah (see figure 10.1). It has been under government control since 2015, following brief hostilities with Houthis. After the liberation of Attaq from the Houthis, the security arrangements had the SEF guarding the entrances to the city and fight terrorism, and the police providing security inside the city. The presence of security and military groups in Attaq in June 2019 was as follows:

**Table 10.1**

The security and military groups in Attaq in June 2019

Location/ Function	Type of force	Relevant commander
Entrances to the city	SEF	Relevant commanders included the Commander of the 4 <sup>th</sup> Brigade, Wajdi Baoum Al-Khulaifi, <sup>69</sup> and Mohammed Salem Al-Buhair Al-Qamishi, the Commander of the Shabwani Elite, Azzan Axiz. <sup>70</sup>
Oil company outside Attaq city	21 <sup>st</sup> Brigade	Jahdal Hanash Al Awlaki
In Attaq	30 <sup>th</sup> Brigade	Brigadier General Aziz Nasser al-Ateeqi
In Attaq	Law enforcement	Brigadier General Awad Al-Dahboul, Director General of Shabwah Police

<sup>67</sup> <http://en.adenpress.news/news/4292>,

<sup>68</sup> Confidential sources. Also, in June 2019, authorities in Shabwah informed the Panel of the formation of 10 “brigades” of approximately 300 people called the southern resistance forces under the command of Hani Bin Brek, vice president of the STC.

<sup>69</sup> <https://t-alhadrami.com/هي-الشبوانية-النخبة-باوم-وجدي-المقدم-الجنوب-اخبار/>

<sup>70</sup> Interview with Al-buhair in his capacity as commander on November 2017, <https://al-omana.com/news65261.html>.

**Figure 10.1**  
Map of Shabwah Province



Source: Open source

## II. The clashes (19 and 20 June 2019)

3. On 17 June 2019, the SEF entered Ataq City, following which the 21<sup>st</sup> Brigade also entered the city.<sup>71</sup> SEF sources also informed the Panel that they entered the city after 12 people had died, in what was likely a tribal-oriented dispute with GoY.<sup>72</sup> Sources explained that the SEF considers the GoY military in Ataq as a wing of the Islah party,<sup>73</sup> a sentiment supported by the STC in its official statements.<sup>74</sup> Observers report that once the 21<sup>st</sup> Brigade entered the city, following the SEF, the issue was no longer a conflict limited to tribal elements, it had morphed into a wider dispute focusing on overall security control of Ataq city.

4. Also, on 17 June 2019, after entering the city, both the 21<sup>st</sup> Brigade and the SEF started establishing their own checkpoints across the city. The city entrances were subsequently blocked by the SEF, the GoY military forces could not receive reinforcements. The same day, the Governor of Shabwah sent an official letter to the UAE in Balhaf informing of the entry of the SEF into the city and the formation of new security checkpoints inside the areas of the operational responsibility of the police. See appendix 1. He warned that this may result in a confrontation between the forces and asked them to give urgent instructions to the Elite Forces to go back to their past positions, contain the situation..." (emphasis added).

<sup>71</sup> Sources: SEF and Shebawah GoY representatives, 02 locals, and 01 tribal leader.

<sup>72</sup> Source: SEF representative. Interview in June 2019.

<sup>73</sup> Ibid. See also facebook page for the SEF at <https://www.facebook.com/SOUTHARABNEWS/>. See for example, post on 04 July 2019.

<sup>74</sup> <http://aden-tm.net/NDetails.aspx?contid=89526>, <https://aden-alhadath.info/news/59613>

**Figure 10.2:**  
Military buildup in Attaq



**Source:** confidential.

5. On 19<sup>th</sup> June, at approximately 21.30 hours, armed clashes began within the city, when the GoY military began shooting at an SEF vehicle, which refused to stop for a GoY military checkpoint.<sup>75</sup> The clashes continued until 20 June 2019, including with tanks. For example, the GoY military fired shells which landed near the Shuhada (martyr's) camp of the SEF,<sup>76</sup> with no recorded casualties.

6. According to local sources, this resulted in damages to two military vehicles and some government infrastructure in the city. Four individuals from the GoY military and security forces, and one from the SEF were reportedly injured.<sup>77</sup>

7. During the course of clashes, the commander and some soldiers of the SEF were surrounded by the GoY military in the local court. They were only allowed to leave following tribal mediation. The tribal mediators and local authorities agreed that both the 21<sup>st</sup> Brigade and the SEF would withdraw from the city to their pre-established positions. The parties agreed to a truce for five days, to allow time for the Governor of Shabwah to find a solution.<sup>78</sup>

**Table 10.2**  
**Parties reportedly involved in clashes, 19 – 20 June 2019**

Party	Entity	Comments
Government	30 <sup>th</sup> Brigade	Based in Qadas.
Military	21 <sup>st</sup> Brigade	Based outside Attaq city and responsible for the protection of oil installations.
Police	Elements of local law enforcement	Based in Attaq city (some referred to this as emergency police, as opposed to regular law enforcement)
SEF	SEF, in particular 4 <sup>th</sup> Brigade.	Fought on the same side with the so-called southern resistance forces.
“Southern resistance forces” <sup>79</sup>	Elements from Assaylan and Marha.	Fought on the same side as SEF

**Source:** Panel

<sup>75</sup> Sources: GoY and locals.

<sup>76</sup> <https://www.stcaden.com/news/9863>

<sup>77</sup> GoY

<sup>78</sup> Document with Panel. There were several conditions for the truce, which included both the SEF and the 21 Brigade to leave Attaq City and for the 21 Brigade to control the oil field and the SEF to control the entry points to the city, and to handover the security of the city to the Police. The Police were asked to request any of the two forces for reinforcements in case the other breaches the agreement.

<sup>79</sup> GoY and local sources claimed that the STC was recruiting and training separate elements called the “southern resistance forces” formed of 10 battalions of 300 people each

## I. Escalation of tensions after the clashes

8. On 21 June 2019, an assassination attempt against the 21<sup>st</sup> Brigade Commander was widely reported.<sup>80</sup> On 22 June 2019, the STC issued a statement, rejecting “every northern military presence” in Shabwah and to direct the security tasking to the police and SEF.<sup>81</sup> On 23 June 2019, the STC called for public protests in support of the SEF.

9. The Governor of Shabwah advised against the protests warning that the situation was already tense. A mediation committee, including the Governor, also stated that while they respected the political right of peaceful protest, the timing was inappropriate, because the security situation was already tense.<sup>82</sup> Also, on 23 June 2019, a pipeline was blown up resulting in a leak. The oil company maintenance team were not allowed to fix the pipeline by the SEF.<sup>83</sup> The STC continued to encourage the protests and mass protests took place on 24 June 2019 in Attaq, without any incidents. The protestors carried banners supporting the re-entry of the SEF into Attaq. The situation remained tense until the events in Aden in August 2019.

**Figure 10.3**

STC-organised protest in Attaq Shabwah (note the People’s Democratic Republic of Yemen flags)



<sup>80</sup> <https://aden-alyoum.com/من-في-اغتيال-لمحاولة-تعرض-العولقي-حنش/سلايدر/>, and <https://www.almashhad-alyemeni.com/136825>

<sup>81</sup> <https://www.stcaden.com/news/9863>, <https://www.stcaden.com/news/9862>, <http://en.adenpress.news/news/4309> and <http://en.adenpress.news/news/4292>

<sup>82</sup> Document with Panel.

<sup>83</sup> Letter from oil company dated 24 June 2019

## Appendix 1: Letter from Governor of Shabwa to the Leadership of the Arab Coalition in Balhaf (18 June 2019)

مكتب محافظ محافظة شبوة  
الرقم الوثائقي: (الصادر)  
التاريخ: ٥١٤ / ٥ / ٢٠١٩  
المرققات: ١٨ / ٦ / ١٩١٣



الجمهورية اليمنية  
وزارة الإدارة المحلية  
محافظة شبوة  
مكتب المحافظ

المحترمين

الأخوة / قيادة التحالف العربي محور بالحاف

خبر طيب،،،

الموضوع/ دخول قوات النخبة وتمركزها في مواقع الأمن والقوات المشتركة  
بعاصمة المحافظة عتق

في البدء نهدىكم أطيب التحايا متمنين لكم التوفيق والنجاح في مهامكم إشارة إلى الموضوع أعلاه ، نطلعكم بقيام قوات النخبة الشبوانية بالدخول إلى العاصمة عتق يوم الاثنين ( ٢٠١٩/٠٦/١٧ م) والتمركز في مواقع الأمن والقوات المشتركة وشرطة السير واستحداث نقاط جديدة داخل نطاق عمل الأمن مما نتج عنه إقلاق السكينة والذعر والهلع في أوساط المواطنين خوفاً من الاشتباكات بين الوحدات الأمنية وقوات النخبة الشبوانية ومثل هذه الأمور تزعزع الأمن والاستقرار بالمحافظة وقد تتطور الأمور إلى الاشتباكات وإلى ما لا يحمد عقباه لأن التوتر يسود الموقف .

وعليه:

تكرموا بالتوجيهات العاجلة للنخبة الشبوانية للعودة إلى مواقعها السابقة وأحتوى الموقف وتجنب المحافظة الصراعات وزعزعة الاستقرار داخل المدينة .

ولكم تقديراً،،،،،

محمد صالح بن عديو  
محافظ محافظة شبوة  
رئيس المجلس المحلي

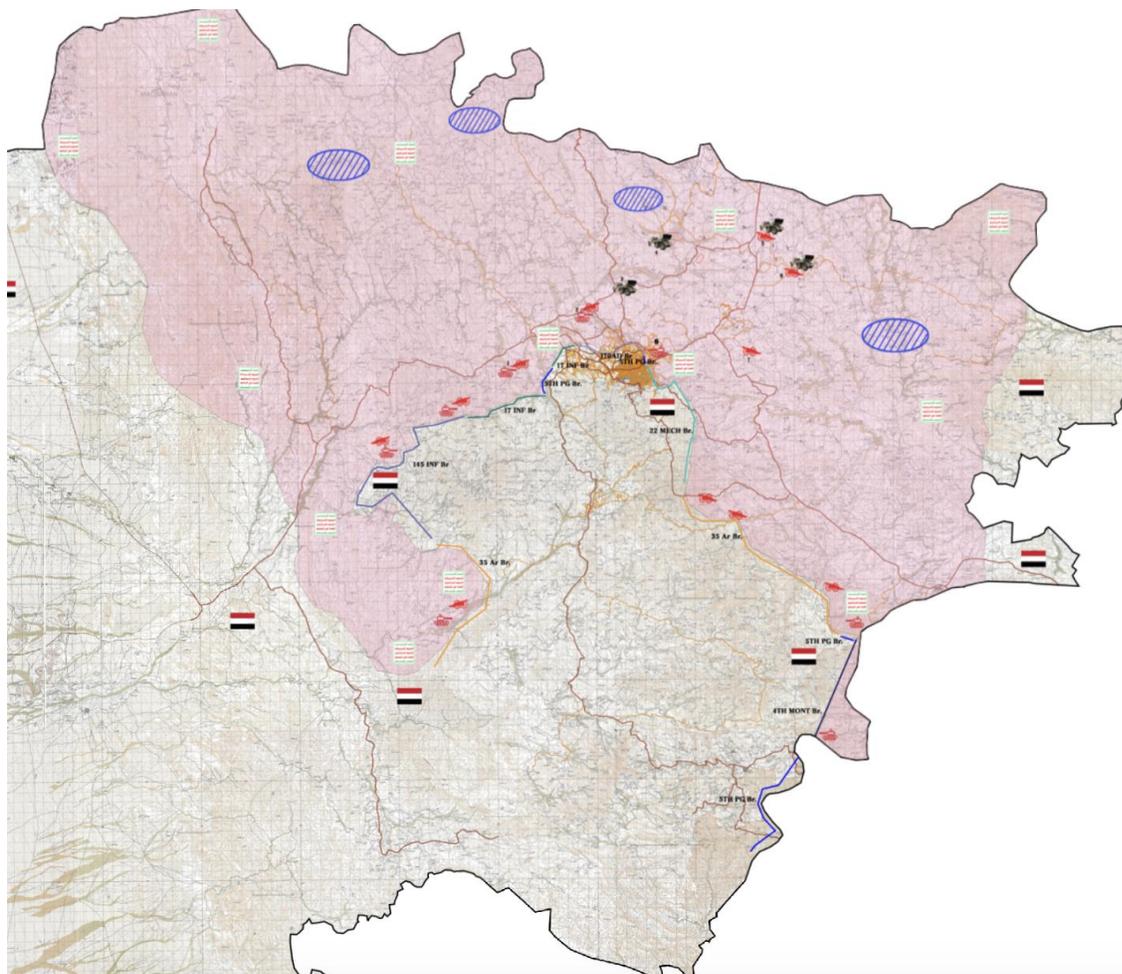


نسخة مع التحية :

- مكتب رئيس الجمهورية .
- رئيس مجلس الوزراء .
- قيادة التحالف العربي المنطقة الوسطى - الريان .

## Annex 11. Map of Ta'izz Frontlines as at June 2019

Note: A high resolution copy is deposited with the Secretariat.

**KEY OF THE MAP :**

SIMPLE	MEANING	SIMPLE	POSITION NAME:	SIMPLE	MEANING
	AREAS UNDER CONTROL OF LEGITIMATE FORCES	1	AL-ROBAIAE		5TH PG Br. 5TH PRESIDENTIAL GUARD BRIGADE
	AREAS UNDER CONTROL OF HOUTHİ MILİTİAS	2	MAFRAQ BANI AUON		4TH MONT Br. 4TH MOUNTANOUS INFANTRY BRIGADE
	AREAS OF POPULAR RESİSTANCE	3	MAFRAQ AL-HASHAMAH		35 Ar Br. 35 ARMORED BRIGADE
	T55, T62 TANKS	4	AL-KASSARAH		22 MECH Br. 22ND MECHANICAL BRIGADE
	ARTILARY DEFFERENT CALIBERS	5	ALJANAD AIRPORT		170AD Br. 170 AIR DEFENSE
	BM 21	6	JABAL OMAN		17 INF Br. 17 INFANTRY BRIGADE
		7	JABAL AALI		145 INF Br. 145 INFANTRY BRIGADE
		8	SOFTEIL AND AL-SALLAL HIGH LANDS		

**SCALE : 1:50000**

Source: Information Provided to the Panel by the Government of Yemen Military Axis and Brigades in Ta'izz

**Annex 12. The military leadership in Ta'izz and integration of resistance forces into GoY in Ta'izz**

**CONFIDENTIAL ANNEX NOT FOR PUBLIC DISSEMINATION**

**Annex 13. Results of the security campaign in Ta'izz in 2019**

**CONFIDENTIAL ANNEX NOT FOR PUBLIC DISSEMINATION**

#### **Annex 14. Case study on the attacks on the Saudi Aramco facilities in Abqaiq and Khureys on 14 September 2019**

1. This case study provides an analysis of the attacks, by a combination of weaponized UAVs and LACMs, on the Saudi Aramco facilities in Abqaiq and Khureys in Kingdom of Saudi Arabia on 14 September 2019. The Houthi forces have, through their media, repeatedly claimed responsibility for the attacks.<sup>84</sup> Upon invitation by Saudi Arabia, the Panel has inspected both the damage to the oil facilities, as well as the weapon systems used in the attacks during two visits in September and November 2019.

2. As previously reported by the Panel, the Houthi forces have repeatedly targeted the vital oil sector of the Kingdom of Saudi Arabia through attacks on tankers operating in the Red Sea using both WBIEDs and anti-ship cruise missiles, as well as through attacks on oil installations using UAVs. However, prior to the attack on Abqaiq and Khureys on 14 September 2019, the impact of these attacks has largely been psychological, rather than material. While the attacks by Houthi forces on Saudi oil tankers in July 2018 led to a temporary shutdown of exports through the Red Sea, the number of seaborne attacks in the waters around Yemen has significantly decreased in 2019. In contrast, the Houthi forces have increased both the frequency and lethality of airborne attacks on civilian targets in Saudi Arabia since mid-2018. However, until the attacks on 14 September 2019, despite a number of attacks on oil production facilities in Saudi Arabia, no significant production losses had been reported.

#### **Attacks on the Saudi Aramco facilities in Abqaiq and Khureys**

3. In the early morning hours of 14 September 2019, two key facilities of Saudi Arabia's national oil company Saudi Aramco were attacked almost simultaneously by a series of aerial strikes. One of the two facilities, the industrial complex at Abqaiq, a town some 60 kilometres Southwest of Dharan in the Eastern Province, is the largest crude oil stabilization plant in the world, according to Saudi Aramco. Stabilization refers to a process through which sour crude oil arriving from the different wells is converted to sweet crude oil through the removal of sulfur impurities, a necessary step before it can be refined further downstream. The stabilization plant in Abqaiq has a capacity of seven billion barrels of oil or about seven percent of global production. The second facility, the Khureys oil field, is located about 250 kilometres southwest of Dharan and produces some 1.5 billion barrels of crude oil per day.<sup>85</sup> Given the distance of more than 1,000 kilometres between the facilities and Houthi-controlled areas of Yemen, which is near or beyond the range limit of known Houthi weapon systems, it seems likely that neither Saudi Aramco nor the government in Riyadh seriously anticipated aerial attacks from Yemen, even though the Panel observed the presence of short-range air defence batteries near Abqaiq during its visit in September 2019.

4. The attack on the Abqaiq plant started at 03.41 hours and ended nine minutes later at 03.50 hours, the facility sustained at least 18 hits from weaponized UAVs, with a number of structures being hit twice. The targets included two different parts of the refinery chain: (1) a number of stabilizer towers, which are large structures, supported by a framework of steel girders and beams. The function of those towers is to remove gasses and water from the crude oil. At the bottom of each tower are two re-heaters (A and B), vessels, which heat the crude oil before pumping it back to the top of tower. (2) a number of separator tanks, which are 28 meters in diameter and approximately 9 meters tall. The function of the separator tanks is to separate gasses from the crude oil. While the stabilizer towers were hit once, three out of a total of nine attacked separator tanks were hit twice. The Panel noted the precise distribution of the impact points on the tanks, which implies a high-level of accuracy in the targeting.

<sup>84</sup> [https://english.almasirah.net/details.php?es\\_id=8774&cat\\_id=1](https://english.almasirah.net/details.php?es_id=8774&cat_id=1)

<sup>85</sup> <https://www.bbc.com/news/world-middle-east-49699429> and <https://www.aljazeera.com/news/2019/09/drones-hit-saudi-aramco-facilities-fires-190914051900472.html>

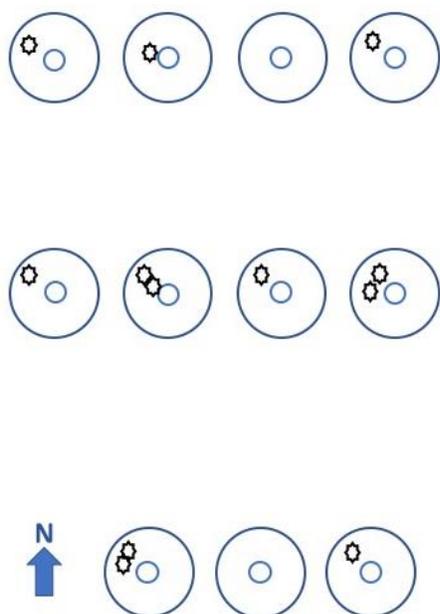
**Figure 14.1**  
Damaged separator tank in Abqaiq



Source: Panel

5. The Panel has analysed the position of the impact points on the stabilizer towers and the separator tanks at Abqaiq and found that the general direction of the attack was from North/North-West. In mid-December 2019, the Panel received information from a Member State stating that, based on the exploitation of one of the UAV's flight computers, it has established that one of the waypoints traversed by one of the UAV's attacking Abqaiq. The geographic coordinates of the waypoint are given as 27.00° N and 48.00° E, a location approximately 200 kilometres North-West of Abqaiq, see figure 14.9. The Panel cannot independently verify this information.

**Figure 14.2**  
Schematic diagram of the separator tanks and impact points

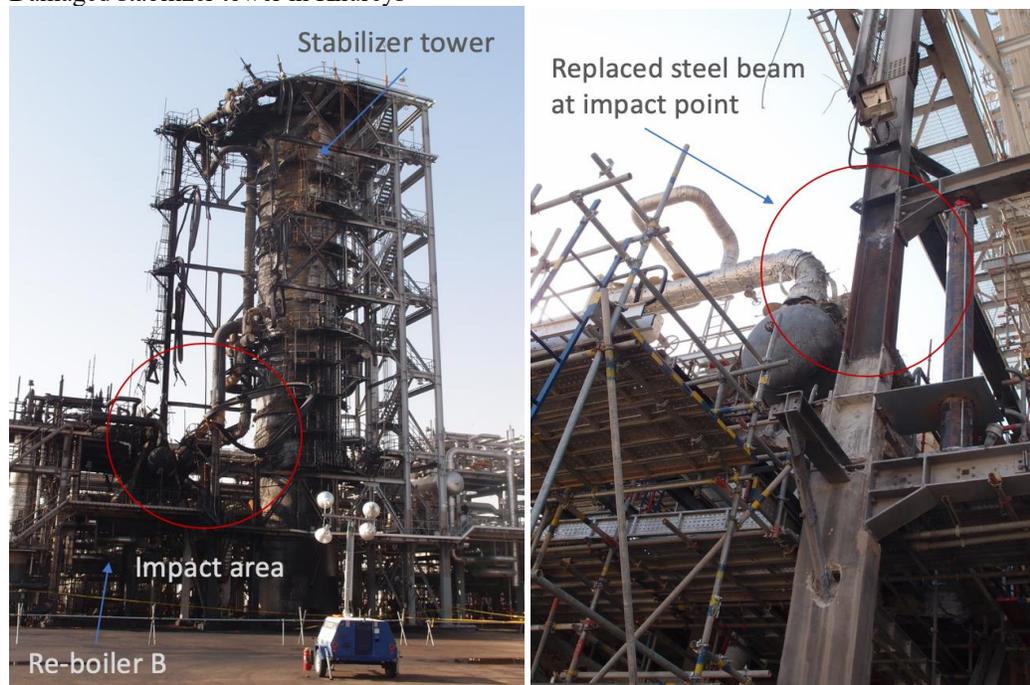


Source: Panel

6. The facility in Khureys was attacked between 03.31 hours and 03.48 hours by at least four LACMs, which hit four (out of a total of five) stabilizer towers. During its inspection of the facility on 21 September 2019, the Panel noted that all four structures were hit at the precisely the same spot, in the lower third of the structure, roughly between re-boiler B and the stabilizer column, which are about three meters apart. It is not clear whether the attackers were aiming for the re-boiler, the stabilizer column or the feed pipe, which run from the re-heater to the tower. The kinetic energy of the missile's warhead must have been significant as it caused serious structural damage to the towers, as well as fires. The Panel has inspected a complete warhead of a similar cruise missile, see annex 18, which was seized from a dhow in the Arabian Sea on 25 November 2019 and has noted that the fragmentation observed in the damaged piping is consistent with the fragmentation visible in the warhead.

**Figure 14.3**

Damaged stabilizer tower in Khureys



Source: Panel

7. Based on the location of the impact area, the attacks came from North/North-East. The general direction of the attack was also confirmed by Saudi Aramco staff during the visit, as well as by footage from one of the facility's surveillance cameras, which shows the direction and shallow angle of the incoming missile.

**Figure 14.4**

Still picture from surveillance video in Khureys showing the moment before the impact

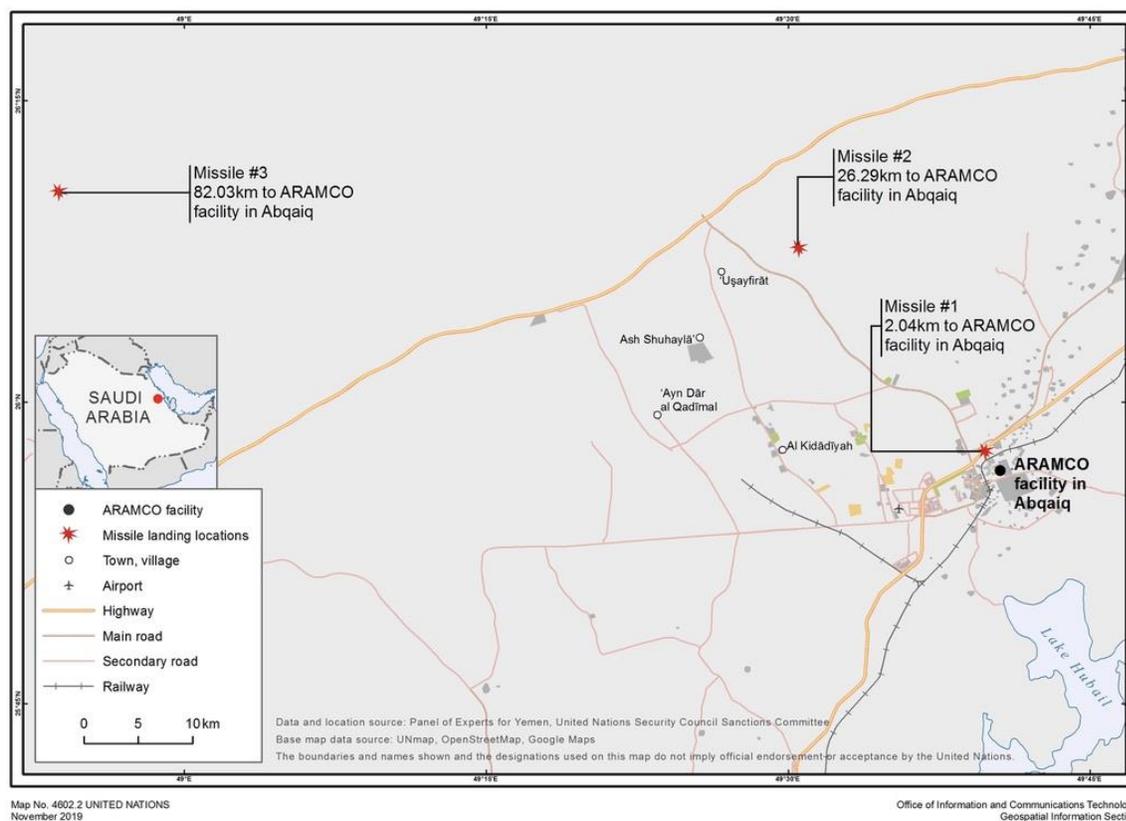


Source: Saudi Aramco

8. In addition to the 18 UAVs, which were used in the attack on Abqaiq and the four LACMs, which were used in the attack on the Khureys oil field, the Saudi authorities informed the Panel that the debris of three additional LACMs had been found in the desert, see figure 14.5 below. The location of the crash sites implies that at least some of them targeted the Abqaiq plant. The total number of weapon systems used during the attacks on 14 September 2019 is therefore at least 25: 18 weaponized UAVs and 7 LACMs. However, it is likely that the real number was even greater given that two (out of a total of 11) separator tanks in Abqaiq as well as one of the five stabilizer towers in Khureys did not sustain any damage. It is likely that additional UAVs and/or cruise missiles were launched but malfunctioned before reaching their target. The complexity and scale of the attacks is unprecedented and shows a high degree of military capacity.

**Figure 14.5**

Map showing the location of the three missiles, which crash-landed near Abqaiq



9. It should be noted that the Panel did not see any debris of the weapon systems on-site in Abqaiq and Khureys, as those had already been transported to Riyadh at the time of the visits on 20 and 21 September 2019. The Panel did see images showing the debris of the cruise missiles (see figure 14.6), which crash-landed close to Abqaiq and visited the location where missile #2 landed in the desert. At the time of the Panel's visit, the impact crater, as well as discolorations in the sand (likely from a fire caused by the impact) were still visible. The Panel also noted small debris fragments, likely from the missile, near the impact site. In contrast, the only physical remnants of the weapon systems visible at Khureys were small metal cubes, part of the fragmentation of the warhead, which were embedded in some of the damaged pipes. It is likely that some debris of the UAVs was still inside the separator tanks at the time of the Panel's visit, but access to the tanks was impossible. During a second visit to Saudi Arabia in November 2019, the Panel noted the presence of additional UAV parts which were covered in oil.

**Figure 14.6**  
Missile debris in the desert near Abqaiq



**Source:** Saudi Arabia

10. In the immediate aftermath of the attack, Saudi Aramco’s daily oil production fell from 9.8 million barrels to about 4.1 million barrels, which is a production loss of almost 60 percent overnight. This reduction represents about five percent of global oil production.<sup>86</sup> While international markets recovered fairly quickly from the initial shock after Saudi Arabia announced that it would make up the temporary production shortfall from reserves, and that the facilities would be repaired by the end of September, the impact of the attacks on Abqaiq and Khureys showed how vulnerable crucial oil installations are to well-planned and executed attacks.

#### **Houthi claims of responsibility for the attacks**

11. Shortly after the attack, the spokesman for the Houthi forces, brigadier Yahya Sare’*e* claimed in a televised statement that the group had carried out the strike with ten UAVs, calling the operation the “Second Deterrent Balance Operation”. He also mentioned that the attackers had support from “honourable and freedom-seeking people” within Saudi Arabia. Earlier in 2019, Houthi spokesman Mohammed Abdulsalam had stated in a television interview that economic targets, such as oil production facilities in Saudi Arabia, would be targeted as this would represent a form of economic deterrence.<sup>87</sup>

12. Just hours after the attacks on Abqaiq and Khureys, United States officials, including Secretary of State Mike Pompeo, expressed doubts that the strikes had been launched by the Houthi forces, stating that there was “no evidence the attacks came from Yemen” and instead blaming Iran for “an unprecedented attack on the world’s energy supply”.<sup>88</sup> In response, the Houthi forces organized another press conference on 18 September 2019, where spokesman brigadier Yahya Sare’*e* claimed on the group’s television channel that the U.S. was using “fabricated satellite images” to portray the damage to the facility as less serious than it was. He also stated that attacks had been launched from three different locations, using a combination of upgraded Qasef and Samad UAVs, as well as a newly developed UAV, which uses cluster heads, capable of dropping four accurate, independently targeted bombs.<sup>89</sup> The Panel notes that so far the Houthis have not presented any video or still imagery of this “newly-developed UAV”, even though Yahya Sare’*e* stated that they would be presented “soon”.

<sup>86</sup> <https://www.wsj.com/articles/drone-strikes-spark-fires-at-saudi-oil-facilities-11568443375>

<sup>87</sup> [http://english.almasirah.net/details.php?es\\_id=6914&cat\\_id=1](http://english.almasirah.net/details.php?es_id=6914&cat_id=1)

<sup>88</sup> <https://www.theguardian.com/world/2019/sep/14/pompeo-iran-saudi-arabia-oil-yemen-houthi>

<sup>89</sup> <https://www.youtube.com/watch?v=oMgGRU6B79s>

## Range analysis

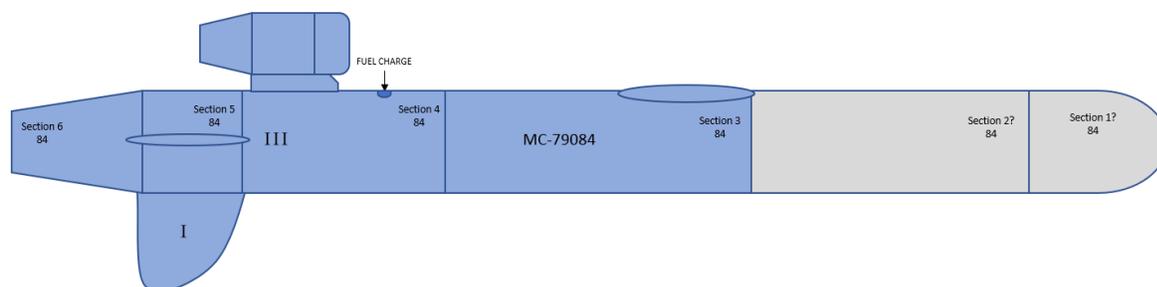
13. The Panel has analysed the range of both the UAV and the Quds-1 cruise missile which were used in the attacks, with the aim of determining whether the attack could have been launched from Yemeni territory under the control of the Houthi forces. Given that the Panel has only incomplete information about the weight and the aerodynamics of each weapon system, to estimate the range of each system, it employs a simple formula in which it divides the estimated fuel capacity by the fuel burn at cruise and then multiplies that number with the system's estimated airspeed. This very rough estimate provides a useful indication of the maximum range.

14. The Panel has analysed the fuel tank of the UAVs used in the attack on Abqaiq – the main fuel tank is an oval cylinder with two wings on either side to maximize the available space, which is located directly in front of the engine. The Panel finds that the volume of this tank is 25 litres.

15. In order to establish the burn rate of the Wankel engine, the Panel has used the performance of the original British version as the baseline. According to the manufacturer's data sheet<sup>90</sup>, this engine delivers about 25 brake horse power (bhp) at cruise, operating at 7,000 RPM or about 70 percent of maximum power. This would result in a burn rate of 8.2 litres, which would put the endurance of the engine at about three hours. Based on a comparison with similar UAV designs, the Panel estimates the airspeed of the UAV to be between 180 and 210 kilometres per hour, which would put the maximum range between 540 and 630 kilometres. The Panel has received information from a Member State indicating the presence of a second fuel tank with an additional capacity of 10 litres. So far, the Panel has not seen any evidence for the existence of this tank among the debris, even though the UAV's fuselage would provide sufficient space and the UAV is clearly designed to maximize range. If the UAV's total tank capacity is 35 litres,<sup>91</sup> the maximum range would be between 760 and 900 kilometres.

**Figure 14.7**

Schematic drawing of the Quds-1 cruise missile



Sections in blue have been inspected by the Panel in KSA

16. As far as the cruise missile is concerned, the Panel has noted that sections 2, 3 and 4 of the fuselage contain fuel tanks. The diameter of each section is 35 centimetres and the length of the tank in section 3 is approximately 106 centimetres, while the length of the tank in section 4 is approximately 40 centimetres. The Panel did not see section 2 of the missile in Saudi Arabia, but has been able to inspect parts of an identical missile, which was seized on 25 November from a Dhow in the Arabian Sea, which included sections 1 and 2. Based on the inspection of that missile, the Panel notes that the fuel tank in section 2 has a length of approximately 82 centimetres, see figure 14.9 below. A cable conduit with a diameter of approximately six centimetres runs through the three sections, so the total fuel capacity of three tanks would be a maximum of 212 litres. According to the manufacturer, the TJ-100 turbojet engine has a fuel burn of 3.12 litres per minute at maximum thrust<sup>92</sup>, which would allow for an endurance of about 68 minutes. Based

<sup>90</sup> <https://uavenginesltd.co.uk/wp-content/uploads/2019/03/ar731.pdf>

<sup>91</sup> The Panel has received information from a Member State stating that the fuel capacity of the UAV is 60 litres, however the Panel does not believe that the fuselage of the UAV could accommodate fuel tanks with this capacity.

<sup>92</sup> See [https://www.pbs.cz/getmedia/3bf0621d-4146-4c90-b8d0-08a875fe6380/PBS\\_Turbojet-engine\\_TJ100\\_EN.pdf.aspx?ext=.pdf](https://www.pbs.cz/getmedia/3bf0621d-4146-4c90-b8d0-08a875fe6380/PBS_Turbojet-engine_TJ100_EN.pdf.aspx?ext=.pdf)

on a comparison with other, similarly-sized cruise missiles, the Panel considers a maximum airspeed of about 0.6 Mach to be realistic, which equates about 735 kilometres per hour. This would mean that the maximum range of the missile would be around 800 kilometres. The Panel has taken note of information received from several Member States, which put the range of the cruise missile at about 700 kilometres, which might be due to a lower speed at cruise.

**Figure 14.8**

Approximate length of the fuel tank in section 2 of the cruise missile



**Source:** Panel

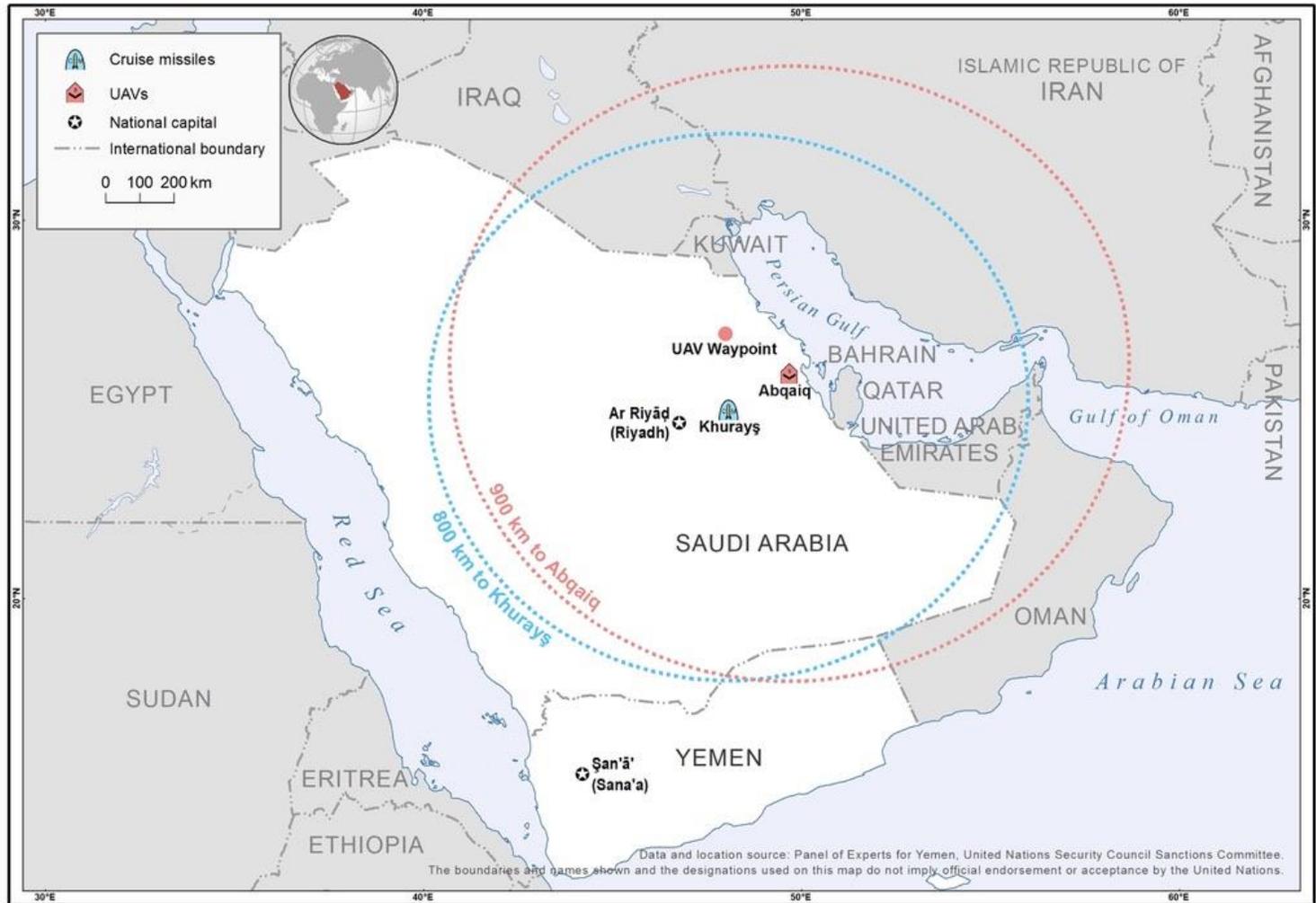
**Conclusions**

17. The Panel notes that Abqaiq and Khureys were approached respectively from a North/North-Western and North/North-Eastern direction, rather than from the South, as one would expect in the case of a launch from Yemeni territory. It also takes note of the waypoint provided by a Member State, which lies in the same direction. Whereas both UAVs and cruise missiles are capable of flying a curve, this would add significantly to the fuel burn. However, even disregarding this factor, the distance between Abqaiq and Khureys and Houthi-held territory (approximately 1,200 kilometres and 1,000 kilometres respectively) are well beyond even the most optimistic range projections.

18. The scale and effectiveness of the attacks on the facilities in Abqaiq and Khureys represents a significant escalation compared with previous strikes attributed to the Houthi forces. Launching 25 or more UAVs and LACMs almost simultaneously and striking deep into enemy territory without detection or interference requires levels of technical and military know-how which the Houthi forces were not known to possess. The precision of the targeting also seems to indicate that the attackers used more advanced guidance systems than those previously observed by the Panel in Houthi weapon systems.

19. In theory, the attacks could have also been launched by Houthi forces either from within Saudi Arabia, from the territory of other countries, or even from sea or airborne launch platforms, but the complexity of the operation (and the fact that the Houthi forces do not have access to suitable platforms) makes such a scenario highly unlikely. The Panel therefore concludes that, despite their claims to the contrary, the Houthi forces did not launch the attacks on Abqaiq and Khureys on 14 September 2019.

**Figure 14.9**  
Range calculations from Abqaiq and Khureys



## Annex 15. Components of the Delta-design UAV

1. The Panel has inspected the debris of numerous engines – both from UAVs used in the May attacks on the pumping stations and from the attack on Abqaiq in September – and has noted that there are at least two different variants. Both variants seem to be unlicensed copies of the original AR731 – 38 BHP 208cc UAV target engine, which is produced by UAV Engines Ltd.<sup>93</sup> in the United Kingdom. According to the manufacturer, this Wankel engine has the highest power-to-weight ratio of any rotary engine in the world and has been specifically designed for small target drones and other short-life UAVs. One of the two variants observed among the debris in Saudi Arabia is cast steel, while the other one made out of cast alloy, with very finely cast curved cooling fins. The Panel believes that the two variants are likely made by different producers, possibly in different countries. Given the storage conditions of the debris in Saudi Arabia, it is not in all cases clear whether the Wankel engines inspected belong to the UAVs used in the attacks in May or in September 2019.

**Figure 15.1**

Different versions of the Wankel engine



Cast steel engine on the left, cast alloy engine on the right

**Source:** Panel.

2. The Panel has documented a variety of markings on the two engine variants: two of the cast steel engines have stenciled factory item numbers on the central cylinder casting, the item number on the third engine has been obliterated. On the inlet manifold itself, the engines have different cast numbers: 030 – 005 – 3C, 030 – 003 – 3C, 030 – 061 – 1C. The alloy engine uses the same size of the internal rotor and shares many of the external components, including the contactless magneto, carburetor and fuel flow regulator, however the Panel has not observed similar cast numbers.

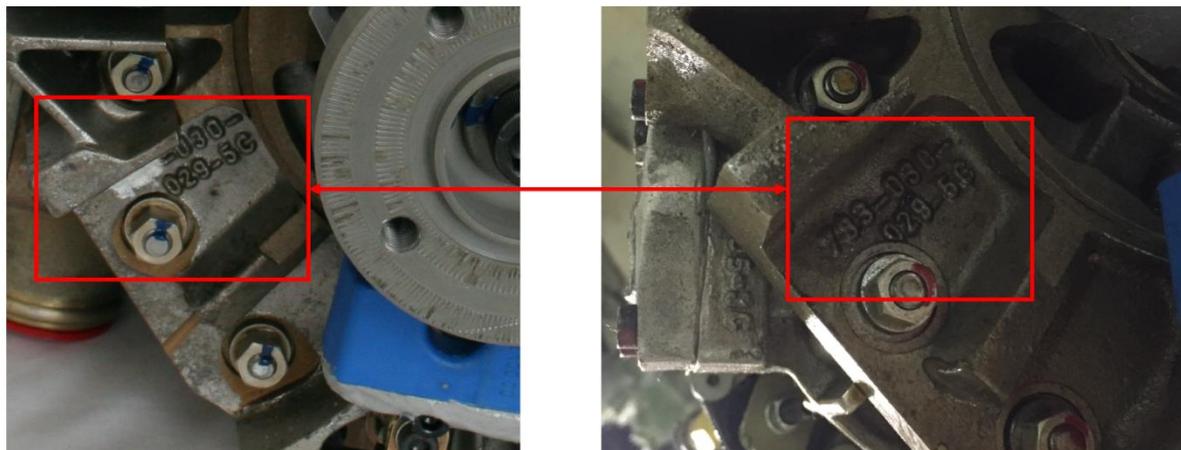
3. The Panel has noted that the technical characteristics and markings on the cast steel engines are similar to the MDR-208 Single Rotor UAV engines, which are produced by Beijing MicroPilot Flight Control Systems (BMP) in Beijing, China.<sup>94</sup> The figures below show a visual comparison of the markings on the MDR-208 engine and the markings on the steel cast version of the UAV engine:

<sup>93</sup> <https://uavenginesltd.co.uk>

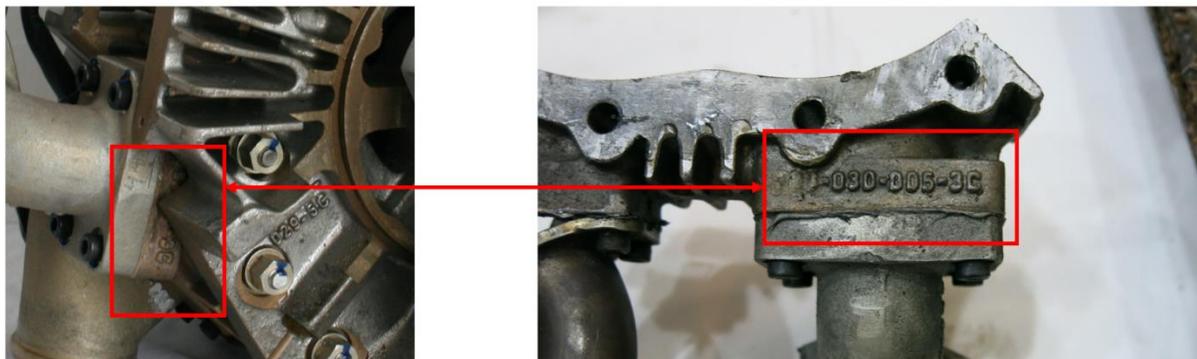
<sup>94</sup> [http://www.uavstar.com/index/index\\_e.htm](http://www.uavstar.com/index/index_e.htm)

**Figure 15.2**

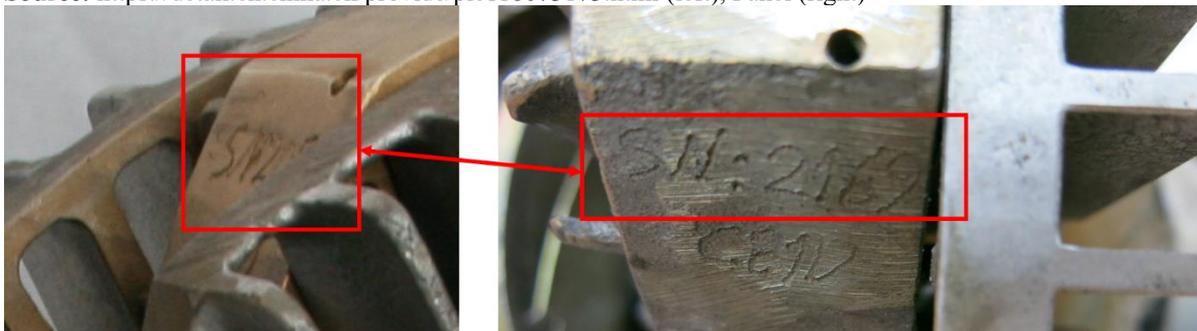
Markings on the MDR-208 engine (left) and the cast steel engine (right)



Source: <https://detail.en.china.cn/provide/pic118073173.html> (left), Panel (right)



Source: <https://detail.en.china.cn/provide/pic118073173.html> (left), Panel (right)



Source: <https://detail.en.china.cn/provide/pic118073173.html> (left), Panel (right)

4. The Panel has noted the presence of the following individual marking on the rotor housing of the cast steel engines - S/N 2169 and an obliterated engine number, as well as S/N 2181 and engine number 1132. The Panel has written to China requesting information on the chain of custody of those engines, a reply is pending.

**Figure 15.3**

Engine number on one of the steel cast engines

**Source:** Panel

5. The Panel has also noted that a Wankel engine, which has very similar technical characteristics, has been displayed in the Iranian media on two separate occasions – during an ‘exhibition of achievement’ of the Aerospace Force of the Islamic Revolutionary Guards Corps on 11 May 2014, which also featured the public display of a different UAV, as well as the ‘Ya Ali’ LACM. In this case, the engine was designated as ‘Shahed-783’ and presented as an indigenous development.<sup>95</sup> The second time, a similar engine was shown during the 5<sup>th</sup> Iranian National Aerospace Exhibition, which was held in October 2014 in Teheran. Here the engine was presented as having been produced by Iranian manufacturer ‘MADO’.<sup>96</sup> The Panel has contacted Iran requesting more information on those engines and was informed that the engines inspected by the Panel, as well as their serial numbers, do not conform to Wankel UAV engines produced in Iran. The relationship between the ‘Shahed-783’, the ‘MADO’ engine, the Chinese MDR-208, as well as the engines inspected in KSA remains unclear and the Panel continues to investigate.

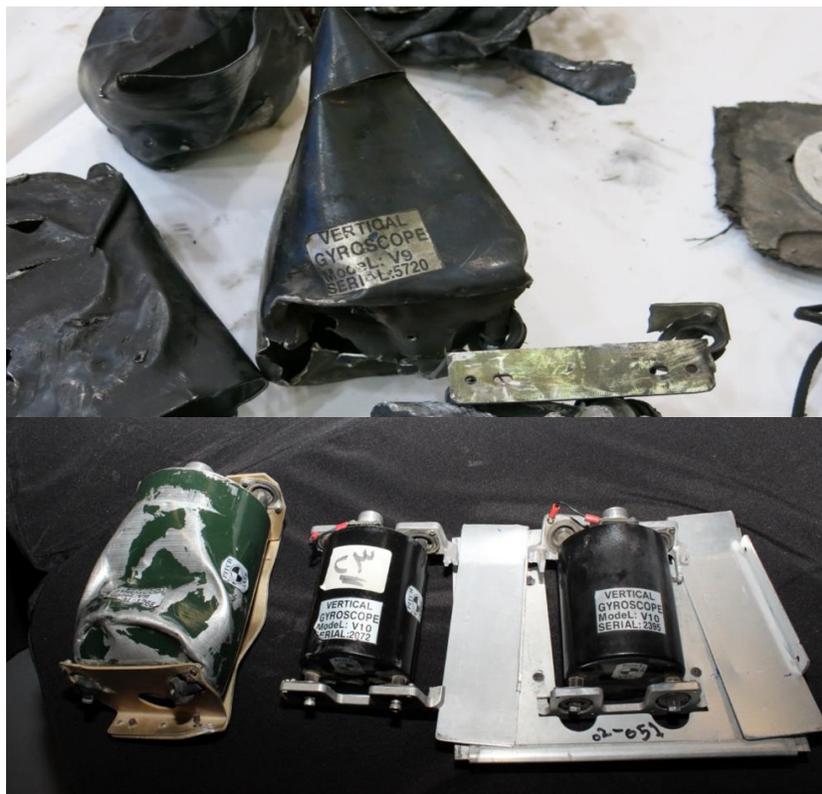
6. Among the debris of the UAVs, the Panel has noted the presence of a black metal vertical gyroscope, which is labelled as ‘Model: V9 Serial: 5279’. This gyroscope seems to belong to the same family as the smaller V10 vertical gyroscope, which has been inspected repeatedly by the Panel among the debris of both Samad and Qasef UAVs, which have been used by the Houthi forces. The gyroscope has stickers showing the roll and pitch axis, as well as an expiration date. The manufacturer of the gyroscope remains unknown. The Panel has so far only seen the V9 model, in this case painted green, among the debris of a UAV, which is on display at the Iran Military Display (IMD) in Washington DC. According to the United States government, this specific UAV crash-landed in Afghanistan in October 2016 and is identified as an Iranian Shahed-123 UAV. The Panel cannot independently verify the origin or the chain of custody of the V9 vertical gyroscope on display at the IMD.

<sup>95</sup> <https://www.uskowioniran.com/2014/05/irgc-asf-exhibition-of-achievement.html>

<sup>96</sup> <https://www.uskowioniran.com/2014/11/takeaways-from-iranian-national.html>

**Figure 15.4**

Vertical gyroscope inspected by the Panel (top), gyroscopes at the IMD (bottom)



Source: Panel

7. The Panel has inspected the debris of at least two different kinds of munitions, which according to the Saudi Arabian military, were associated with the Delta-design UAVs. In June 2019, the Panel noted the presence of a munition, which consists of a large cylinder (550 millimeters x 145 millimeters) encircled by small, cubic fragmentation, as well as large copper shaped charge, which seems designed to penetrate heavy armor. It was labeled as coming from the 14 May 2019 attacks. During the inspection in November 2019, the Panel noticed a second munition, which was confusingly also labelled as coming from the May attacks. Unlike the industrially manufactured combined effects munition described above, this improvised munition consists of C4 high explosives poured into a fiberglass shell, which is embedded with steel fragmentation. The shell fits into the nose cone of the UAVs. It is not clear what kind of munition was used in the attack on Abqaiq, even though the damage seems to be more consistent with an improvised munition.

**Figure 15.5**

Different munitions documented among the debris of the Delta-design UAVs



Source: Panel

8. Beyond the engine, munition and gyroscope, the inspection of the debris of the UAVs showed that the unknown manufacturer relied on a number of commercial, off-the-shelf components from a range of countries, in particular in the fuel system, servos and the avionics. Figure 15.6 provides an overview over the components documented during the inspections in Saudi Arabia, as well as information on the chain of custody, where available.

**Figure 15.6**

Commercial components documented among the debris of the Delta-design UAV

Image	Item	Manufacturer	Country of origin	Last known custodian
	Fuel pump	TI Fluid System	United Kingdom/Poland	Response from company pending.
	AM7 ignition coils	Swedish Electro Magnets (SEM)	Sweden	180 units with batch numbers matching the inspected components were exported in 2016 to Excell Agency, Flat No. 101, Spring Blossom Apt., Pune, India. A response from the company is pending.
	'Petrol King' Carburetor Fuel Pressure Regulator	Officina Meccanica Malpassi	Italy	100 units with batch numbers matching the inspected components were exported in February 2018 to Glencoe Ltd., Drake Ave., Gresham Rd., Staines, Middlesex, United Kingdom. A response from the company is pending.
	LSF40 Flow Monitors	OVAL Corporation	Japan	Units with serial numbers matching inspected components were exported in July 2017 to a company in Hong Kong, which exported them to another company in Shenzhen. Another unit with a matching serial number was inspected in 2013 to

				a company in Singapore, which exported it to Malaysia.
	HL-304F Carburettor	Tillotson	Ireland	500 units with batch numbers matching inspected components were produced in 2011. Units from this batch were sold in small lots as after-market parts to resellers across Europe and the USA.
	HS-M7990TH Monster Torque servo actuator	HiTec	Republic of Korea	Response from Member State pending.
	Inertial Measurement Sensor Unit	Analog Devices	USA	Response from company pending.
	Capacitor	General Electric	USA	Response from company pending.

Source: Panel

## Annex 16. Components of the ‘Quds-1’ LACM

1. The Quds-1 cruise missile is powered by an externally-mounted turbojet engine, which appears to be an unlicensed copy of the TJ-100 turbojet produced by PBS Velká Bíteš in the Czech Republic.<sup>97</sup> According to the manufacturer, with its compact design, comparatively low weight and a maximum thrust of 1,300 Newton, the engine was specifically designed for missiles, target drones and UAVs. The Panel has noted a number of differences in manufacturing, including the yellow color of anodizing on the fuel ramp and the rough casting of the inlet part, between the original TJ-100 engines and the engines, which have been inspected in Saudi Arabia. The TJ-100 turbojet has been exported to a wide number of countries, but no copies had previously known to exist. The Panel has inspected the turbojet engines from the debris of at least six different cruise missiles, some of which (coming from the missiles, which crash-landed on soft ground in the desert near Abqaiq) were in remarkably good condition. The Panel has noted a variety of markings, both externally and on the inside of the engines, which include the designation ‘Model T10S’, as well as a manufacturing date of ‘2019/04’. A second turbojet engine was marked with a manufacturing date of ‘2019/01’.

**Figure 16.1**

Turbojet engine documented among the debris of the LACM



Source: Panel

2. Among the debris of turbojet engines, the Panel has noted the presence of several original parts produced by PBS Velká Bíteš, i.e. two ignition boxes (serial numbers 203036.11 and 203036.15) as well as two bypass governors (serial number 216012.2 and 216013.2). The Panel believes that those original parts, belong to the turbojet engines of the missiles (marked as S/N 10025 and S/N 10031), which have crash-landed near Abqaiq. So far, the Panel has not been able to identify any original PBS Velká Bíteš components among the debris of the turbojet engines, which were used in the other attacks. It is possible that those two engines, despite the manufacturing date of 2019, represent an earlier, prototype version. Performance differences between this engine version, and the ones used in the other attacks, might also explain why the three cruise missiles landed short.

<sup>97</sup> See <https://www.pbs.cz>

**Figure 16.2**  
Original PBS components



Source: Panel

3. The Panel has been able to partially trace the chain of custody for those four original parts<sup>98</sup> - the ignition box with the serial number 203036.15 and the bypass governor with the serial number 216012.2 were both part of an original PBS TJ100A engine with the serial number 185, which was produced in August 2010. The ignition box with the serial numbers 203036.11 was part of an original PBS TJ100A engine with the serial number 193, while the bypass governor with the serial number 216013.2 was part of an original PBS TJ100A engine with the serial number 195. Both, engines #193 and #195 were produced in October 2010. So, in total the Panel has documented parts from three original PBS turbojet engines, which were exported all to the same company – China Feixiang Aviation Science Technology Ltd. in Hong Kong during two separate transactions in August 2010 and in November 2011. In total, PBS exported 75 TJ100A turbojet engines to this customer. The Panel has contacted China requesting information on the chain of custody for those engines, a response is pending.

4. The Panel has also inspected a number of servo actuators, which are used to control the three, rear-mounted control surfaces in section 5 of the cruise missile. The Panel has noted a number of marking, for example F469-492 and MS7-21K0486. Among the debris of the servos, the Panel has documented a small motor, which seems to have been manufactured by Maxon Motor AG in Switzerland. Despite efforts to obliterate the markings on the motor, the Panel has been able to document a batch or serial number - V642530-1-2 / 51 1. The Panel has contacted Switzerland in order to establish the chain of custody of the motor. A response is pending.

<sup>98</sup> The Panel has documented an additional original PBS part on the turbojet engine of the LACM, which was seized on a dhow in the Arabian Sea on 25 November 2019. It has contacted the Czech Republic, requesting information on the chain of custody. A reply is pending.

**Figure 16.3**

Servo actuators documented among the debris of the LACM



Source: Panel

5. In addition to the turbojet engines and the servo actuators, the Panel has identified a number of other commercial components, mainly with regard to the fuel system of the LACM. These include an AMISCO EVI/5P coil system, which is manufactured in Italy, as well as 30.600 G OEM Pressure Transmitters, which are manufactured by BD Sensors in Germany. The Panel is investigating the chain of custody of those components.

**Figure 16.4**

Commercial components documented as part of the LACM's fuel system



Source: Panel

6. The Panel has not been able to inspect sections 1 and 2 of the missile in Saudi Arabia, however the identical missile, which was seized on 25 November 2019 in the Arabian Sea did contain complete sections 1 and 2. The Panel has been able to inspect those sections and has noted that the missile's warhead (in section 1) contains fragmentation in the form of the same metal cubes, which the Panel has documented in the damaged piping at Khureys after the attack on 14 September 2019. With regard to section 2, the Panel did document the avionics of the missile, but was unable to open and further exploit them.

**Figure 16.5**  
Warhead (section 1) and avionics (section 2)



Source: Panel

**Annex 17. Houthi supply networks for commercial parts used in UAVs and WBIEDs**

1. This annex provides more details on three cases, where commercial parts, which might be used in the assembly of UAVs and WBIEDs have been transferred to Houthi-controlled areas, or where such transfers have been stopped by seizures. They illustrate a pattern of supply networks, which includes manufacturers in numerous countries, as well as intermediaries, who, knowingly or unknowingly, are supporting the Houthi war efforts.

**Case 1: UAV components, which were transferred from Hong Kong to Al Jawf in Yemen**

**Figure 17.1**

DLE UAV engines seized in Al Jawf



Source: Panel.

**Figure 17.2**

DLE engine ignition boxes seized in Al Jawf



Source: Panel

**Figure 17.3**  
Exhaust pipes for DLE UAV engines seized in Al Jawf



Source: Panel

**Figure 17.4**  
Cardboard box containing propeller blades seized in Al Jawf



Source: Panel

**Figure 17.5**  
Propeller blades of different sizes seized in Al Jawf



Source: Panel

**Figure 17.6**  
UAV flight control ailerons seized in Al Jawf



Source: Panel

**Figure 17.7**  
Components used in UAV guidance units in Al Jawf



Source: Panel

**Figure 17.8**  
Detail of shipping label on the packaging in Al Jawf



Source: Panel

2. The Panel has been able to establish that the shipment was exported by a Guangzhou Nanyi Trade using the services of logistics company SMT-Global in Hong Kong, first via truck from mainland China to Hong Kong and then by air cargo via Bangkok to Muscat, where it was picked up on 2 December 2018. The consignee was Bahjat Alleqa'a with an address in Muscat in Oman, see figure 17.9.

Figure 17.9  
Air Waybill for the shipment obtained by the Panel

910 BKK 12945402 910-12945402

Shipper's Name and Address GUANGZHOU NANYI TRADE CO., LTD. C/O SMT GLOBAL LOGISTICS LTD UNIT 7 A & 7B 39/F, CABLE TV TOWER, NO. 9 HOI SHING ROAD, TSUN WAN, N. T. H.K.		Shipper's Account Number		Not Negotiable Air Waybill OMAN AIR Issued by	
Consignee's Name and Address BAHIAT ALLEQA'A S. O. OMAN - MUSCAT, ALJAWAIR, 22W P.O. BOX 1816 TEL: 009689030 1308 AL_LEQA'A113@HOTMAIL.COM		Consignee's Account Number		It is agreed that the goods described herein are accepted in apparent good order and condition (except as noted for shortage) SUBJECT TO THE CONDITIONS OF CONTRACT ON THE REVERSE HEREOF. ALL GOODS MAY BE CARRIED BY ANY OTHER MEANS INCLUDING ROAD OR ANY OTHER CARRIER UNLESS SPECIFIC CONTRARY INSTRUCTIONS ARE GIVEN HEREON BY THE SHIPPER, AND SHIPPER AGREES THAT THE SHIPMENT MAY BE CARRIED VIA INTERMEDIATE STOPPING PLACES WHICH THE CARRIER DEEMS APPROPRIATE. THE SHIPPER'S ATTENTION IS DRAWN TO THE NOTICE CONCERNING CARRIER'S LIMITATION OF LIABILITY. Shipper may increase such limitation of liability by declaring a higher value for carriage and paying a supplemental charge if required.	
Issuing Office's Agent Name and City SMART FREIGHT (HK) LIMITED		Accounting Information NOTIFY PARTY: SAME AS CONSIGNEE ROUTING: BKK/BKK...HKG/1/28 NOV BKK/MCT...LHR/16/02 DEC		Copies 1, 2 and 3 of this Air Waybill are originals and have the same validity.	
Agent's IATA Code 13-3 7253 0006		Amount No.		Reference Number JOB: SMTAE1811-001 2	
Airport of Departure (Addr. of First Carrier) and Requested Routing HONG KONG		Originating Shipping Information "FREIGHT PREPAID"		Destination (Addr. of Last Carrier) and Requested Routing MUSCAT	
To BKK HX		Via MCT WY		Declared Value for Carriage N. Y. D.	
Amount of Invoice MUSCAT HX761 Nov 28, 2018		Currency NTL		Declared Value for Customs AS PER INV.	
Handling Information TOTAL : ONE HUNDRED FORTY-ONE (141) PACKAGE(S) ONLY ORIGINAL INVOICE AND PACKING LIST ATTACHED. NO SOLID WOOD PACKING MATERIALS					
No. of Pieces 141		Gross Weight 2957.0 K		Net Weight 2957.0	
Dimensions 110x 76x 120cm 83x 64x 24cm 300x 76x 86cm 42x 23x 27cm 130x 30x 30cm 65x 40x 26cm		Commodity Item No. 1, 76x 48x 72cm 1, 76x 53x 43cm 1, 131x 30x 32cm 10, 28x 28x 11cm 1, 32x 25x 17cm 5, 51x 30x 30cm		Chargable Weight 2957.0	
				Rate 39.370	
				Total 116417.09	
				Nature and Quantity of Goods (Net Dimensions or Volume) GRADING SCALE SCREWS DRILL TOOLS MUDS CONNECTORS POWER INVERTER WITHOUT BATTERY (103PKGS)  BLUETOOTH HEADSET LITHIUM-ION BATTERIES IN COMPLIANCE WITH SECTION II OF PI 967 (38PKGS)  T/S CARGO FM CHINA TO MCT VIA-BKK-BY-TRUCK	
Freight BKKD116417.09		Weight Charge		Other Charges ADC=13.00 TC=4967.80	
Savings Charge		Tax		NYC=8575.30	
Total Other Charges Due Agent		Total Other Charges Due Carrier		29 NOV '18 16:04	
BKKD13556.10				Shipper certifies that the particulars on the face hereof are correct and that neither as any part of the consignment contains dangerous goods, such part is properly described by name and is in proper condition for carriage by air according to the applicable Dangerous Goods Regulations.	
Total Paid		Total Collected		SMT GLOBAL LOGISTICS LTD / SPX Signature of Shipper or his Agent	
BKKD29977.19 Collector's Commission Point		GU Charges If Used, Currency		Nov 27, 2018 HONG KONG Executed on (date) at (place)	
For Carrier's Use only as per Part 1		Charges at Destination		LHR15 SA: 16479 Signature of Issuing Office or its Agent	

Source: Confidential

**Case 2: Servo actuators for use in UAVs and WBIEDs**

**Figure 17.10**  
SSPS 105 Servo actuators seized in the UAE



Source: Panel.

**Figure 17.11**  
SSPS servo actuators in a 'Shahed-123' UAV (left) and in the steering box of a WBIED (right)



Source: Panel.

Figure 17.12  
Air Waybill for the export of the servo actuators from Japan to the UAE

2/1

Expanded Service  
International Air Waybill

2020/02/24

2020/02/24 2049 6717 1

HAJIO BANDO +81337582980

TONEGAWA SERVO CO., LTD

2-18-8 SHIMOMURO, OTA-CITY

TOKYO

JAPAN 148-0202

2020/02/24 2049 6717 1

2020/02/24 2049 6717 1

UAE

54 x 39 x 24

Description	Quantity	Weight	Volume
N/A SERVO ACTUATOR		2.79	
STANDARD BOX STD	88	4.23	2.103200

Yak D9 A011A

8103 2957 6682 0417

SCL

Source: Confidential

Figure 17.13

Commercial invoice for the export, showing that the buyer is Mohammed Alswari in Sana'a, Yemen

MARKS & NUMBERS		NO OF PKGS	DESCRIPTION OF GOOD	QUANTITY	UNIT VALUE	TOTAL VALUE
AS ADDRESSED		6	Radio Control Actuator SSPS105-24V±45° STD	60pcs	JP¥35,000.	JP¥2,100,000.
6CTN						Total JP¥2,100,000.-

I DECLARE THAT ALL INFORMATION CONTAINED IN THIS INVOICE TO BE TRUE AND CORRECT.

SIGNATURE OF SHIPPER/EXPORTER (TYPE NAME AND TITLE AND SIGN)

Please use only for peace.

Date Oct. 22, 2018

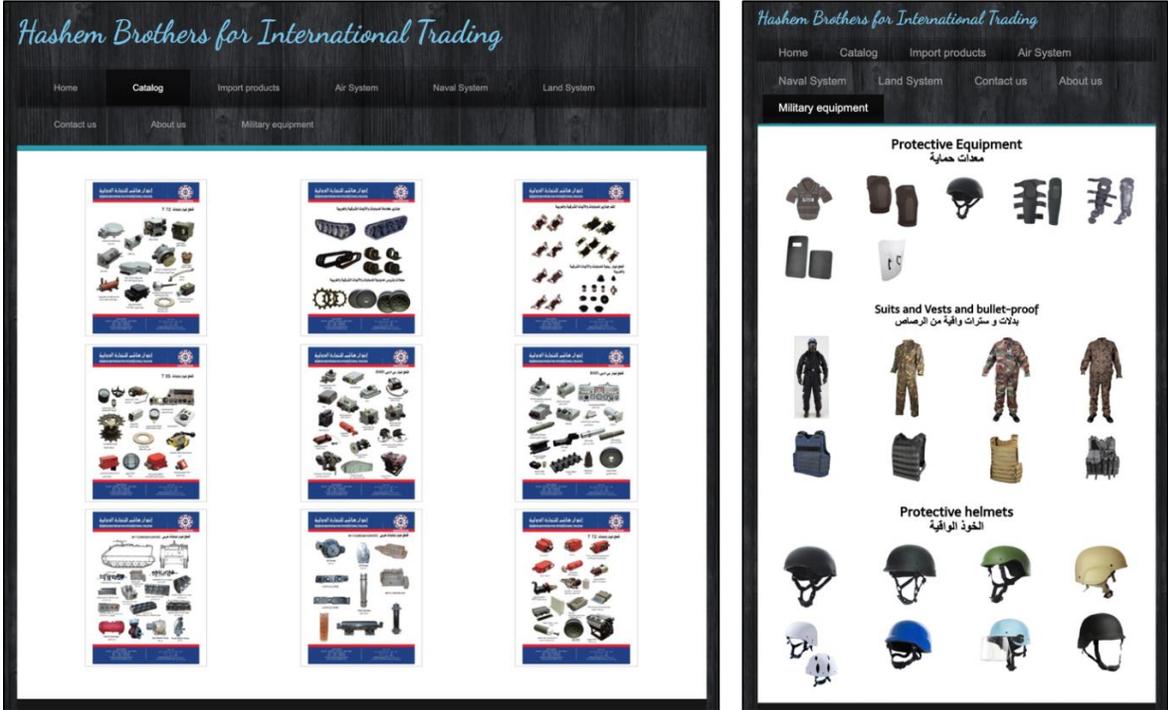
*Harujo Bando*

HARUJO BANDO

Source: Confidential

3. The Panel has obtained information that Al Sawari Trading & Import, located at Dar Salm Bridge, Ta'izz Road, in Sana'a, Yemen, shares an address with two other companies, which seem to be associated with the Al Sawari family: Alswari Group for Rubber Industries, which manufactures rubber parts for cars, agricultural equipment and industrial use, as well as Hashem Brothers for International Trading, which supplies rubber and non-rubber parts for military equipment. According to its website, Hashem Brothers for International Trading also supplies UAV parts. The three companies seem to share the same address, as well as at least some e-mail addresses and telephone numbers. The Panel has noted that the website of Hashem Brothers seems to have been taken offline after the Panel started making inquiries, even though the company's Facebook site still exists.

Figure 17.14 Hashem Brothers for International Trading website (now defunct)



Source: <http://www.HBIT.weebly.com>

**Figure 17.15**  
Hashem Brothers for International Trade Facebook site

Gefällt mir   Abonnieren   Teilen   ...

**Info**

**Unternehmensinfos**

Erstellt am 23. Oktober 2012

**Mission**  
supplying, installing the equipments, accessories and the spare parts used for developing, updating and maintaining the military machineries and equipment of different kinds also to supply the equipment's and tools

**KONTAKTINFO**

Anrufen +967 733 778 887

[m.me/HashimBrothersforInternationalTrading](https://m.me/HashimBrothersforInternationalTrading)

[salman-mohammed@hotmail.com](mailto:salman-mohammed@hotmail.com)

<http://www.HBIT.weebly.com>

**WEITERE INFOS**

Hashem Brothers For International Trading Company is of the Leading companies in the Republic of Yemen specialized in the field of supplying the technical and fighting equipments & tools required for establishing and updating the security end developed systems as well as supplying of the accessories and the spare parts used for maintenance and updating the equipments tools and machineries belonged to the security and military units or the multi-purpose ubits (civil-military).

Source: [https://www.facebook.com/pg/HashimBrothersforInternationalTrading/about/?ref=page\\_internal](https://www.facebook.com/pg/HashimBrothersforInternationalTrading/about/?ref=page_internal)

**Case 3: Chain of custody for 3W UAV engines documented among the debris of Samad-UAVs in 2018**

**Figure 17.16**

3W-110iB2 engines inspected by the Panel



Source: Panel

**Figure 17.17**

Obliterated engine number on one of the 3W engines



Source: Panel

**Figure 17.18**  
Delivery note for the transfer of the engines to Greece

# 3W-International GmbH

3W-International GmbH · Hollerstr. 12 · D-61350 Bad Homburg

Eurowings Aviation & Consulting Ltd.  
12 Ventouri Street  
15561 Holargos Athen  
Greece





c 999999990 999999 c (00)

KUNDE

Customer No.: 60175  
Processed by: cw  
Delivery date: 22.06.2015  
Date: 22.06.2015

**Delivery Note No. 2015-128**

Item	Qty.	Unit	Art.-No.	Weight kg	Description
1	21,0	pcs	10.001.420		3W-110i B2, tractor, counter clockwise gasoline engine incl. ignition
2	21,0	pcs	10.001.500		3W-112i B4, tractor, counter clockwise gasoline engine incl. ignition

Source: Confidential

**Figure 17.19**  
Packing list showing the engine number



## 753.1 Packliste / Packing list

Kunde / Customer: EUROWINGS

Datum/Date: 23.06.15

AB-2248

Karton Nr. / Box no.	Menge / Qty.	Einheit / Unit	Artikelnummer / Article number	Seriennummer / Serial number	Kartongröße / Box Size	Gewicht / Weight (kg)	verpackt / packed
8	1	Stück / pcs Paar / pair	10.000.200	3W.112iB4 + 2 x Twinignition 35+45cm 1506271L			
9	1	Stück / pcs Paar / pair	10.000.200	3W.112iB4 + 2 x Twinignition 35+45cm 1506283L	H124	11,1	UW
10	1	Stück / pcs Paar / pair	10.000.200	3W.112iB4 + 2 x Twinignition 35+45cm 1506272L			
10	1	Stück / pcs Paar / pair	10.000.200	3W.112iB4 + 2 x Twinignition 35+45cm 1506285L	H124	11,1	UW
10	1	Stück / pcs Paar / pair	10.000.200	3W.112iB4 + 2 x Twinignition 35+45cm 1506288L			
11	1	Stück / pcs Paar / pair	10.000.200	3W.112iB4 + 2 x Twinignition 35+45cm 1506270L	H124	10,1	UW
12	1	Stück / pcs Paar / pair	10.001.420	3W.110iB2+ Twinignition 35cm 1561517B			
12	1	Stück / pcs Paar / pair	10.001.420	3W.110iB2+ Twinignition 35cm 1561515B	H124	9,3	UW
12	1	Stück / pcs Paar / pair	10.001.420	3W.110iB2+ Twinignition 35cm 1561522B			
13	1	Stück / pcs Paar / pair	10.001.420	3W.110iB2+ Twinignition 35cm 1561524B	H124	9,3	UW
13	1	Stück / pcs Paar / pair	10.001.420	3W.110iB2+ Twinignition 35cm 1561514B			
14	1	Stück / pcs Paar / pair	10.001.420	3W.110iB2+ Twinignition 35cm 1561513B	H124	9,3	UW
14	1	Stück / pcs Paar / pair	10.001.420	3W.110iB2+ Twinignition 35cm 1561520B			
15	1	Stück / pcs Paar / pair	10.001.420	3W.110iB2+ Twinignition 35cm 1561516B	H124	9,3	UW
15	1	Stück / pcs Paar / pair	10.001.420	3W.110iB2+ Twinignition 35cm 1561512B			

Copyright Qualitätsmanagement 3W, Revision 1, Seite 1 von 2, Gültig ab 10.12.2012

Source: 3W-International GmbH

Figure 17.20  
Packing list showing the re-export from Greece to Iran



**EUROWINGS AVIATION & CONSULTING LTD.**  
 EORI NUMBER: GR 099289025  
 12 Ventouri Street, Holargos, 15561 Athens, Greece  
 Tel: (0030) 210 6525100, Fax: (0030) 210 6525125  
 VAT No: GR 099289025, Email: info@eurowings.gr  
 Web Site: http://www.eurowings.biz, www.eurowings.gr  
 Bank Account Information: PIRAEUS BANK - ATHENS, GREECE

## PACKING LIST

Date	2/7/2015
Order #	GITI-1-0515
Invoice #	GITI/1/072015
Customer ID	GITI

Page 1/1

IBAN NUMBER: GR9601720430005043061394728 SWIFT/BIC:PIRBGAA0XX

**CUSTOMER**

**GITI RESAN KALA CO.**  
 No.25, Ayatollah Kashani Blvd.  
 TEHRAN / IRAN  
 TEL: (+9821) 47230000-30  
 MOB:  
 Email:

**SHIP TO**

GITI RESAN KALA CO., No.25, Ayatollah  
 Kashani Blvd, TEHRAN / IRAN Tel:  
 (+9821) 47230000-30

PARTIAL SHIPMENT OF GOODS AS PER  
 PROFORMA INVOICE # EW-GITI-  
 PF1/0515

**SHIPPING DETAILS**

Freight Type (Air/Surface): Air  
 Est Ship Date:  
 Est Gross Weight: **231,0 kgr**  
 Est Cubic Weight:  
 Total Packages(Qty): **21**

PART NUMBER	UNIT OF MEASURE	PRODUCT/ SERVICE DESCRIPTION	TARIC	PACKAGE #	QTY SHIPPED
10.001.500	PIECE	3W-112IB4 model engine	84079010	1	2
10.001.500	PIECE	3W-112IB4 model engine	84079010	2	2
10.001.500	PIECE	3W-112IB4 model engine	84079010	3	2
10.001.500	PIECE	3W-112IB4 model engine	84079010	4	2
10.001.500	PIECE	3W-112IB4 model engine	84079010	5	2
10.001.500	PIECE	3W-112IB4 model engine	84079010	6	2
10.001.500	PIECE	3W-112IB4 model engine	84079010	7	2
10.001.500	PIECE	3W-112IB4 model engine	84079010	8	2
10.001.500	PIECE	3W-112IB4 model engine	84079010	9	2
10.001.500	PIECE	3W-112IB4 model engine	84079010	10	2
10.001.500	PIECE	3W-112IB4 model engine	84079010	11	1
10.001.420	PIECE	3W 110IB2 model engine	84079010	11	1
10.001.420	PIECE	3W 110IB2 model engine	84079010	12	2
10.001.420	PIECE	3W 110IB2 model engine	84079010	13	2
10.001.420	PIECE	3W 110IB2 model engine	84079010	14	2
10.001.420	PIECE	3W 110IB2 model engine	84079010	15	2
10.001.420	PIECE	3W 110IB2 model engine	84079010	16	2
10.001.420	PIECE	3W 110IB2 model engine	84079010	17	2
10.001.420	PIECE	3W 110IB2 model engine	84079010	18	2
10.001.420	PIECE	3W 110IB2 model engine	84079010	19	2
10.001.420	PIECE	3W 110IB2 model engine	84079010	20	2
10.001.420	PIECE	3W 110IB2 model engine	84079010	21	2
<b>TOTAL UNITS</b>					<b>42</b>

**TERMS OF SALE AND OTHER COMMENTS**

Shipped goods are for MODEL AIRCRAFT and DO NOT FALL under EU Dual Use, EU Common Military List and National Export Controls.

**ADDITIONAL DETAILS**

Country of Origin: EU originating products.  
 Port of Embarkation: ATHENS, GREECE  
 Port of Discharge: TEHRAN, IRAN  
 Reason for Export: Sale

I certify the above to be true and correct to the best of my knowledge.

Constantine Hadjifethymilades  
 Eurowings Aviation & Consulting Ltd.

**EUROWINGS**  
 ΑΕΡΟΠΟΡΙΚΕΣ & ΣΥΜΒΟΥΛΕΥΤΙΚΕΣ  
 ΥΠΗΡΕΣΙΕΣ ΕΠΕ  
 ΒΕΝΤΟΥΡΗ 12  
 15561 ΧΘΛΑΡΓΟΣ-ΑΘΗΝΑ  
 ΤΗΛ: 6525 100 FAX: 6525.125  
 ΑΦΜ: 099289025  
 ΔΟΥ: ΧΘΛΑΡΓΟΥ

Date: 2/7/2015

Page 1 of 1

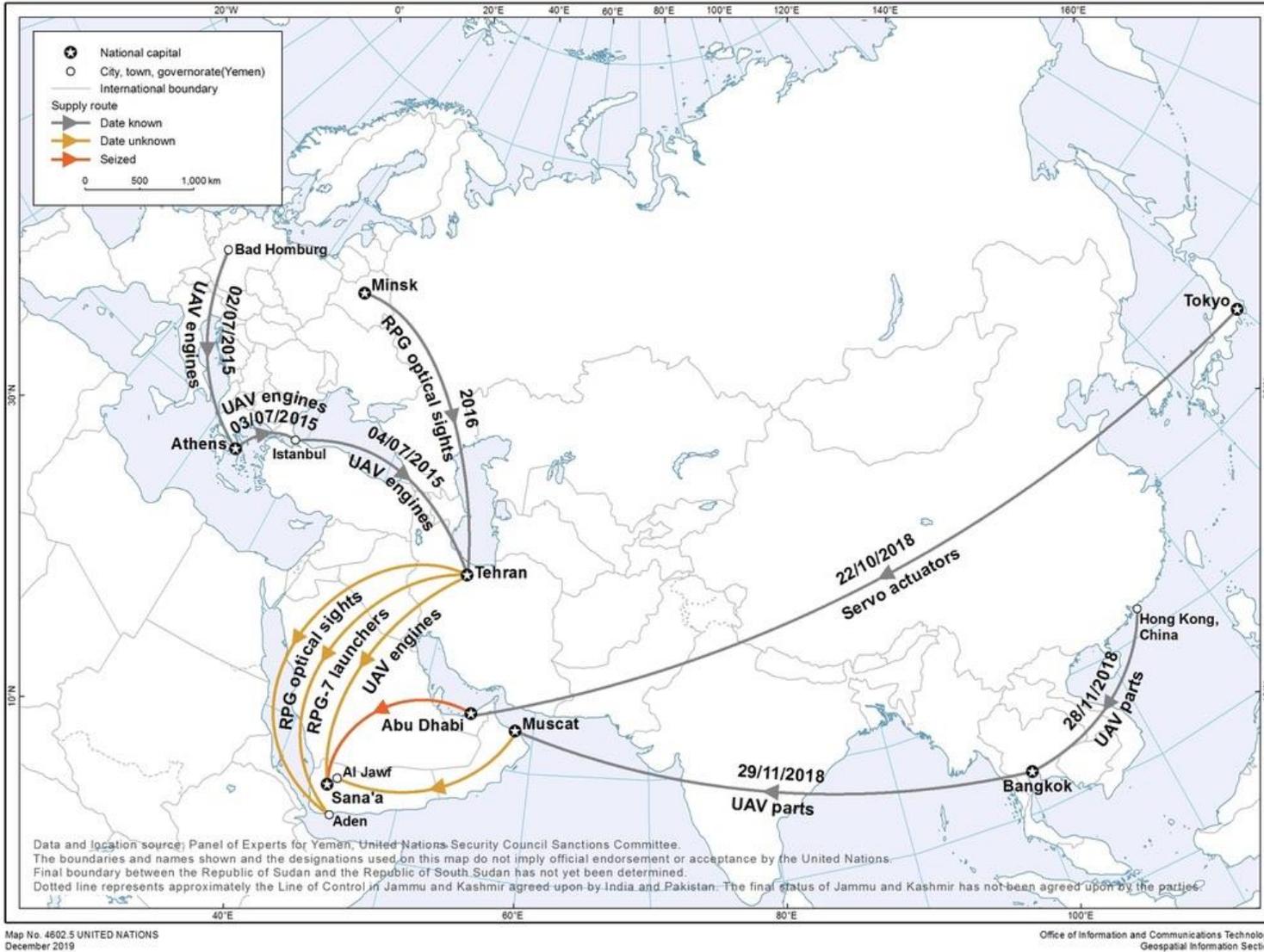
Source: Confidential

Figure 17.21  
Air Waybill for the re-export from Greece to Iran

235 ATH 0282 5270		235-0282 5270	
Shipper's Name and Address <b>EUROWINGS AVIATION &amp; CONSULTING LTD</b> 12 VENTOUR STR 15561 ATHENS GREECE VAT EL099289025 TEL 2106525100		Shipper's account Number	
Consignee's Name and Address <b>GITI RESAN KALA CO.</b> NO 25 AYATOLLAH KASHANI BLVD, TEHRAN, IRAN TEL (+9821) 47230000-30		Consignee's account Number	
Issuing Carrier's Agent Name and City <b>HARLAS INT'L TRANSPORT S.A., A/P BR</b> EL. VENIZELOS ATHENS INT'L A/P BLDG VAT NUM: EL093354037		Accounting Information <b>FREIGHT PREPAID VAT:</b>	
Agent's IATA Code 27-4-7438/1056		Account No. 1056	
Airport of Departure (Addr. of first Carrier) and requested Routing <b>ATHENS</b> to <b>ATH</b> - 1ST - <b>THR</b>		Declared Value for Carriage <b>NVD</b>	
By first Carrier Routing and Destination <b>IST TK</b> to <b>THR TK</b>		Declared Value for Customs <b>NCV</b>	
Airport of Destination <b>TEHRAN</b>		Amount of Insurance <b>NIL</b>	
Flight Dates <b>TK1844/03.07.15</b> <b>TK870/04.07.15</b>		Currency <b>EUR</b>	
Handling Information <b>ENVELOPE ATTACHED, PSE INFORM CNEE UPON ARRIVAL TOP! TOP! URGENT! MUST FLY A</b>		INSURANCE - If carrier offers insurance and such insurance is requested in accordance with conditions on reverse hereof, indicate amount to be insured in figures in box marked amount of insurance.	
No. of Pieces <b>21</b>		Gross Weight <b>214,00</b>	
Rate Class <b>K Q</b>		Chargeable Weight <b>300,00</b>	
Rate <b>2,10</b>		Total <b>630,00</b>	
ETA 14.40 LT		Nature and Quantity of Goods (incl. Dimensions or Volume) <b>AIRCRAFTS SPARE PARTS</b> <b>NOT RESTRICTED</b> <b>DIMS/CMS:</b> <b>21 QTY 54x39x35</b> <b>AS 300 KGS</b>	
Prepaid <b>630,00</b>		Other Charges <b>CCC : 10,00</b> <b>FSC : 107,00</b> <b>SEC : 32,10</b>	
Weight Charge <b>630,00</b>		Tax	
Collect <b>149,10</b>		Total other Charges Due Agent	
Total other Charges Due Carrier <b>149,10</b>		Shipper certifies that the particulars on the face hereof are correct and that insofar as any part of the consignment contains dangerous goods, such part is properly described by name and is in proper condition for carriage by air according to the applicable DANGEROUS GOODS REGULATIONS.	
Total prepaid <b>779,10</b>		Signature of Shipper <b>HARLAS INT'L TRANSPORT S.A.</b> Signature of Agent <b>LAGODIMOS GEORG</b>	
Total collect		Executed on (Date) <b>2 JULY 2015</b>	
Currency Conversion Rates		Signature of Issuing Carrier or its Agent <b>ATHENS</b>	
Charges at Destination		235-0282 5270	

Source: Confidential

Annex 18. Map of Houthi supply networks documented during the reporting period



**Annex 19. Weapons and arms-related materials seized in Aden**

**Figure 19.1**

Type 56-1 assault rifles seized in Aden



Source: Panel

**Figure 19.2**

Detail of the production stamp on the type 56-1 assault rifles



Source: Panel

**Figure 19.3**  
Detail of serial numbers on the type 56-1 assault rifles



Source: Panel.

**Figure 19.4**  
RPG-7 launcher seized by the Coalition in Aden, disassembled by the Panel



Source: Panel.

**Figure 19.5**

Serial numbers on RPG-7 launchers seized in Aden and inspected by the Panel

Ser.	Top row	Bottom row
1.	3295	9593295
2.	3325	9593325
3.	3466	9593466
4.	3511	9593511
5.	3737	9593737
6.	3781	9593781
7.	3823	9593823
8.	3826	9593826
9.	3850	9593850
10.	4081	9594081
11.	4107	9594107
12.	4144	9594144
13.	4221	9594221
14.	4333	9594333
15.	4349	9594349
16.	4365	9594365
17.	4376	9594376
18.	4386	9594386
19.	4389	9594389
20.	4504	9594504
21.	4540	9594540
22.	96090551	5841
23.	96090550	6188

**Figure 19.6**

PGO-7V3 optical sights for RPG launchers seized by the Coalition in Aden



Source: Panel

**Figure 19.7**

Serial numbers of PGO-7V3 optical sights seized in Aden and inspected by the Panel

<b>Ser.</b>	<b>Front side serial number (stamped)</b>	<b>Aftermarket number (engraved)</b>
1.	N1611053	3297
2.	N1611259	4233
3.	N1611996	4818
4.	N1611393	3352
5.	N1611362	3283
6.	N1612221	4232
7.	N1611812	4152
8.	N1612012	4579
9.	N1612717	3924
10.	N1612163	3777
11.	N1610594	4151
12.	N1612659	4138
13.	N1611167	3351
14.	N1612009	4564
15.	N1612038	4635
16.	N1612631	4234
17.	N1612036	4280
18.	N1612084	4261
19.	N1611195	4215
20.	N1611095	3340
21.	N1611015	3398
22.	N1611287	3912
23.	N1611221	3270
24.	N1610823	4171
25.	N1611295	3313

Annex 20. Weapons and arms-related materials seized from a dhow in the Arabian Sea

Figure 20.1  
9M133 ‘Kornet’ ATGMs, which characteristics similar to the Iranian version ‘Dehlaviyeh’



The launch tubes with the red band contain the thermobaric version of the missile, in the back are the transport containers.

Source: Panel.

**Figure 20.2**

Comparison between the launch tubes for the original 'Kornet' version of the 9M133 ATGM (left) and the Iranian 'Dehlaviyeh' (right), these weapons were inspected in 2018 in KSA



Source: Panel

**Figure 20.3**

Markings on the seized ATGMs documented by the Panel

Type	Lot #	Date	Serial #
HEAT	64	2017	63
HEAT	64	2017	30
HEAT	64	2017	33
HEAT	55	2017	05
HEAT	55	2017	40
HEAT	55	2017	47
HEAT	55	2017	20
HEAT	55	2017	37
HEAT	55	2017	11
HEAT	55	2017	08
HEAT	55	2017	04
HEAT	55	2017	02
HEAT	55	2017	23
Thermobaric	43	2017	12
Thermobaric	43	2017	54
Thermobaric	43	2017	13
Thermobaric	43	2017	28
Thermobaric	43	2017	23
Thermobaric	43	2017	43
Thermobaric	75	2018	38
Training	--	--	--

**Figure 20.4**

Previously not documented cruise missile, possibly for Surface-to-Air (SAM) use



Source: Panel

**Figure 20.5**

Details of optical seeker (left) and V.10 vertical gyroscope (right) documented on the missile



Source: Panel

**Figure 20.6**  
Detail of the front section of the missile



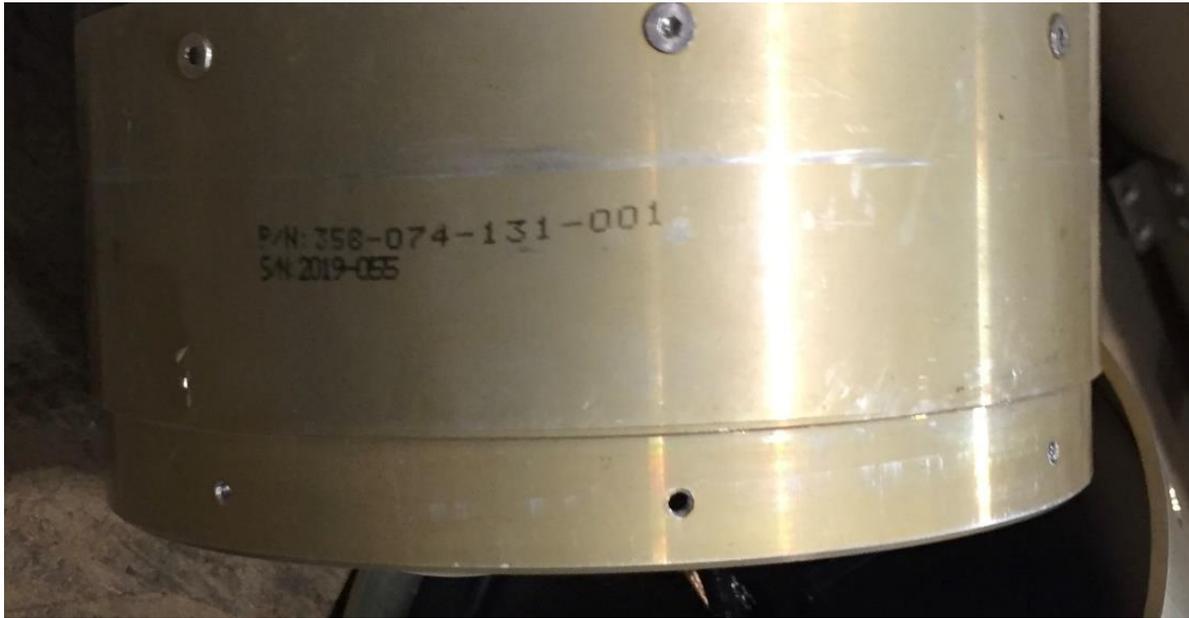
Source: Panel

**Figure 20.7**  
Kerosene ignitors manufactured by Advanced Microturbines (AMT) Netherlands documented on the missile



Source: Panel

**Figure 20.8**  
Detail of marking on the missile, implying a manufacturing date in 2019



Source: Panel

**Figure 20.9**  
Sections of a C802 anti-ship cruise missile



Source: Panel

**Figure 20.10**  
Sections of a Quds-1 LACM



**Source:** Panel

**Figure 20.11**  
Computer Terminal, possibly associated with the missiles



Source: Panel

**Figure 20.12**  
Non-electric detonators – a total of 13,700 in boxes of 50 each



Source: Panel

**Figure 20.13**  
UAV engines and other related components



Source: Panel.

**Figure 20.14**  
RU90 (top) and RU60 (bottom) thermo-optical sights and associated batteries



Source: Panel.

**Figure 20.15**  
Parts for the conversion of boats to WBIEDs



Source: Panel

**Annex 21. Delay of tankers proceeding to al Hudaydah port**

1. Import of goods to Red Sea ports of al Hudaydah and Salif involves a three-step process. First, the importer applies for clearance through UNVIM which is usually delivered within 48 hours allowing the vessel to proceed to the Coalition Holding Area (CHA) about 140 nautical miles (260 km) North West of al Hudaydah. The vessel has then to hold in the CHA until it receives a clearance from the Coalition Evacuation and Humanitarian Operations Cell (EHOC) in Riyadh, through a Coalition vessel, to proceed to the Anchorage Area (AA) at the entrance of al Hudaydah or Salif port. Statistics gathered by the Panel and information from importers has shown a lack of predictability in the delays in the CHA. Finally, the vessel waits in the anchorage area until it receives clearance from port authorities under Houthi control. The lack of transparency in this process has allowed GoY, the Coalition and the Houthis to wield significant leverage over importers by delaying their chartered vessels, forcing them to pay extra charges for demurrage. This leverage easily allows for corrupt practices by expediting clearance or extorting traders by delaying their vessels.
2. As reported in S/2019/83, al Hudaydah has been the only port allowed by the GoY to receive fuel in Houthi controlled areas. GoY started to implement decree 75 in June 2019 eliminating traders who could not submit justification of payment of their cargoes through bank transfers. In addition, GoY started to implement decree 49 in July 2019 requiring payment of import taxes before proceeding to the port of discharge. The Panel has copies of GoY documents requiring payment of a list of taxes with the amount to be deposited in specified USD, SAR and YER accounts in Aden, al Mukalla, Ma'rib, Nishtun and KSA. The total tax for 11,000 Mt of fuel amounted to around 320 million YER. Importers informed the Panel that prepayment of import taxes before the arrival to port was not legal, and incurred the additional risk of the cargo not reaching its intended port after such payment.
3. The Houthis and importers doing business in areas under their control have perceived the implementation of decrees 75 and 49 as a means of shifting imports of fuel from al Hudaydah to Aden where importers associated with the GoY have benefited from a monopoly situation. This resulted in a competition between the technical office of the Economic Committee of GoY and the Houthi external payment committee (Lajnat al Madfu'at) to compel importers to pay taxes in their respective areas. Though some importers obtained the required UNVIM clearances, usually within 48 hours, the technical committee, through the Coalition, denied clearance for their tankers to proceed to al Hudaydah. Similarly, some importers who complied with GoY requirements were denied entry to al Hudaydah by the Houthis.
4. Data gathered by the Panel on 58 tankers that applied for entry to al Hudaydah between 1 June and 30 November 2019, showed that the total delay was 865 days by the Coalition and 381 days by the Houthis. On average, each tanker was delayed for 15 days by the Coalition and for seven days by the Houthis. The cost of these unnecessary delays was financial loss payable by Yemeni consumers inside Houthi-controlled areas. The details are in table 21.1.

**Table 21.1**

Delays of tankers carrying fuel to al Hudaydah during six months (June to November 2019), as of 5 December 2019

<b>Ref Tanker</b>	<b>Cargo (Mt)</b>	<b>Date Processing</b>	<b>Date CHA</b>	<b>Date Anchorage</b>	<b>Date Berthing</b>	<b>Delay CHA</b>	<b>Delay Anchorage</b>
xxxx173	7,185	03-Jun-19	12-Jun-19	18-Jun-19	20-Jun-19	6	2
xxxx127	20,964	03-Jun-19	12-Jun-19	23-Jun-19	30-Jun-19	11	7
xxxx809	4,800	16-Jun-19	20-Jun-19	25-Jun-19	30-Jun-19	5	5
xxxx952	4,485	18-Jun-19	02-Jul-19	04-Jul-19	08-Jul-19	2	4
xxxx937	29,291	24-Jun-19	02-Jul-19	04-Jul-19	17-Jul-19	2	13
xxxx171	3,854	30-Jun-19	04-Jul-19	10-Jul-19	11-Jul-19	6	1
xxxx952	29,536	30-Jun-19	04-Jul-19	11-Jul-19	14-Jul-19	7	3
xxxx328	26,919	30-Jun-19	14-Jul-19	15-Jul-19	29-Jul-19	1	14
xxxx278	30,000	30-Jun-19	04-Jul-19	17-Jul-19	22-Jul-19	13	5
xxxx164	7,237	02-Jul-19	16-Jul-19	24-Jul-19	26-Jul-19	8	2
xxxx141	15,608	02-Jul-19	10-Jul-19	21-Jul-19	23-Jul-19	11	2
xxxx903	15,010	07-Jul-19	15-Jul-19	21-Jul-19	29-Jul-19	6	8
xxxx223	28,989	07-Jul-19	15-Jul-19	06-Aug-19	11-Sep-19	22	36
xxxx570	30,103	21-Jul-19	25-Jul-19	04-Aug-19	21-Aug-19	10	17
xxxx706	27,165	22-Jul-19	30-Jul-19	01-Aug-19	08-Aug-19	2	7
xxxx796	15,988	22-Jul-19	29-Jul-19	31-Jul-19	04-Aug-19	2	4
xxxx442	30,031	22-Jul-19	30-Jul-19	31-Jul-19	29-Aug-19	1	29
xxxx193	29,259	22-Jul-19	30-Jul-19	31-Jul-19	15-Aug-19	1	15
xxxx671	29,872	25-Jul-19	01-Aug-19	07-Aug-19	15-Aug-19	6	8
xxxx099	8,278	28-Jul-19	31-Jul-19	04-Aug	05-Aug-19	4	1
xxxx650	29,987	28-Jul-19	04-Aug-19	15-Aug-19	25-Aug-19	11	10
xxxx937	28,898	04-Aug-19	13-Aug-19	15-Aug-19	04-Sep-19	2	20
xxxx127	20,959	12-Aug-19	18-Aug-19	08-Oct-19	09-Oct-19	51	1
xxxx952	29,403	15-Aug-19	19-Aug-19	21-Aug-19	14-Sep-19	2	24
xxxx182	3,542	18-Aug-19	27-Aug-19	30-Aug-19	31-Aug-19	3	1
xxxx778	30,054	21-Aug-19	27-Aug-19	26-Sep-19	30-Sep-19	30	4
xxxx826	10,818	24-Aug-19	09-Sep-19	18-Oct-19	19-Oct-19	39	1
xxxx796	15,928	27-Aug-19	03-Sep-19	16-Oct-19	17-Oct-19	43	1
xxxx171	3,721	29-Aug-19	03-Sep-19	26-Sep-19	06-Oct-19	23	10
xxxx557	5,703	29-Aug-19	31-Aug-19	22-Sep-19	23-Sep-19	22	1
xxxx851	10,937	31-Aug-19	07-Sep-19	17-Oct-19	19-Oct-19	40	2
xxxx671	29,498	03-Sep-19	09-Sep-19	18-Oct-19	19-Oct-19	39	1
xxxx099	8,383	03-Sep-19	09-Sep-19	23-Sep-19	01-Oct-19	14	8
xxxx706	27,022	07-Sep-19	14-Sep-19	19-Oct-19	23-Oct-19	35	4
xxxx328	26,915	14-Sep-19	03-Oct-19	19-Oct-19	04-Nov-19	16	16
xxxx442	29,989	21-Sep-19	28-Sep-19	19-Oct-19	31-Oct-19	21	12
xxxx293	29,642	24-Sep-19	30-Sep-19	23-Oct-19	26-Oct-19	23	3
xxxx374	11,179	24-Sep-19	05-Oct-19	19-Oct-19	21-Oct-19	14	2
xxxx570	40,472	02-Oct-19	09-Oct-19	23-Nov-19	26-Nov-19	45	3
xxxx937	29,971	06-Oct-19	14-Oct-19	12-Nov-19	14-Nov-19	29	2
xxxx141	17,364	07-Oct-19	13-Oct-19	14-Nov-19	21-Nov-19	32	7
xxxx265	23,316	10-Oct-19	15-Oct-19	26-Oct-19	07-Nov-19	11	12

Ref Tanker	Cargo (Mt)	Date Processing	Date CHA	Date Anchorage	Date Berthing	Delay CHA	Delay Anchorage
xxxx952	29,528	14-Oct-19	22-Oct-19	12-Nov-19		21	23
xxxx063	7,493	21-Oct-19	26-Oct-19	31-Oct-19	02-Nov-19	5	2
xxxx815	19,718	23-Oct-19	27-Oct-19	14-Nov-19	19-Nov-19	18	5
xxxx099	6,213	23-Oct-19	29-Oct-19			37	
xxxx182	4,828	28-Oct-19	06-Nov-19	09-Nov-19	11-Nov-19	3	2
xxxx641	10,995	29-Oct-19	04-Nov-19	12-Nov-19	14-Nov-19	8	2
xxxx127	21,022	31-Oct-19	06-Nov-19	22-Nov-19	23-Nov-19	16	1
xxxx650	29,600	03-Nov-19	11-Nov-19			24	
xxxx255	24,854	06-Nov-19	16-Nov-19			19	
xxxx671	29,933	06-Nov-19	13-Nov-19	21-Nov-19	02-Dec-19	8	11
xxxx147	25,991	11-Nov-19	19-Nov-19			16	
xxxx796	15,809	11-Nov-19	17-Nov-19	21-Nov-19	24-Nov-19	4	3
xxxx293	29,695	16-Nov-19	23-Nov-19	01-Dec-19		8	4
xxxx706	27,467	21-Nov-19	01-Dec-19			4	
xxxx442	30,000	24-Nov-19	02-Dec-19			3	
xxxx473	27,672	26-Nov-19	05-Dec-19				
<b>Total days</b>						<b>865</b>	<b>381</b>
<b>Days per tanker</b>						<b>15</b>	<b>7</b>

Source: Panel based on UNVIM daily reports and vessels tracking from <https://maritime.ihs.com/>.

**Figure 21.1**

Tankers delayed at the Coalition Holding Area (CHA) and the Anchorage area as of 30 September 2019<sup>99</sup>



Source: Panel using <https://maritime.ihs.com/>.

<sup>99</sup> During his briefing to the Security Council on the humanitarian situation in Yemen, on 16 September 2019, Under-Secretary-General for Humanitarian Affairs and Emergency Relief Coordinator, Mark Lowcock announced that “As of today, the Government and the Coalition are blocking ten vessels with commercial fuel imports from entering Hudaydah. Together, these ships are carrying 163,000 metric tones of fuel – that’s more than an average month of fuel imports.”, see <https://reliefweb.int/report/yemen/under-secretary-general-humanitarian-affairs-and-emergency-relief-coordinator-mark-21>.

## Annex 22. Documents indicating instructions to disguise the origin of the fuel

- 1) Several sources in the GoY, as well as confidential sources with links to the Houthis, informed the Panel that Mohammed Abdusalam Salah Fletah and his brother Salah Abdusalam Salah Fletah are the main actors within the network involved in channelling external financial support to the Houthis through fuel imports to Yemen.<sup>100</sup> Abdusalam Fletah, being the main interlocutor with the international community spends most of his time in Oman from where he travels to other destinations including Iran and Lebanon. According to several contacts, Abduslam Fletah has a very comfortable financial situation in Oman with a possibility of business activity in that country.
- 2) The Panel has gathered evidence, including bank transactions, that could help in tracing potential links between his business activities and external financial support to the Houthis and the financing of arms-related items found while being smuggled into Yemen via Oman. Transactions related to the payment of shipping fees for fuel imports to Yemen with fake documents to disguise their Iranian origin are also of interest.
- 3) The Panel received documents showing that the consignees in Yemen have instructed the shipping company to issue Bills of Lading (B/L) indicating that the fuel has been shipped from Oman instead of its real origin in Iran.

**Table 22.1**

Tankers with documents falsely indicating that the fuel was shipped from Oman

Tanker	Declared shipper	Port	date	Consignee	Evidence
MT Pvt Eagle	Al Ezz Al Arabiya Trading	Mahshahr	8/11/2016	Matrix Oil	Fin.2.1
MT Androussa	Sahool al Hojari Trading	Bandar Abbas	14/12/2016	Yemen Elaf	Fin.2.2
MR Nautilus	Sahool al Hojari Trading	Mahshahr	10/1/2017	Albarakah	Fin.2.3
MT Safe Sino	Sahool al Hojari Trading	Iran	27/3/2017	Albarakah	Fin.2.4

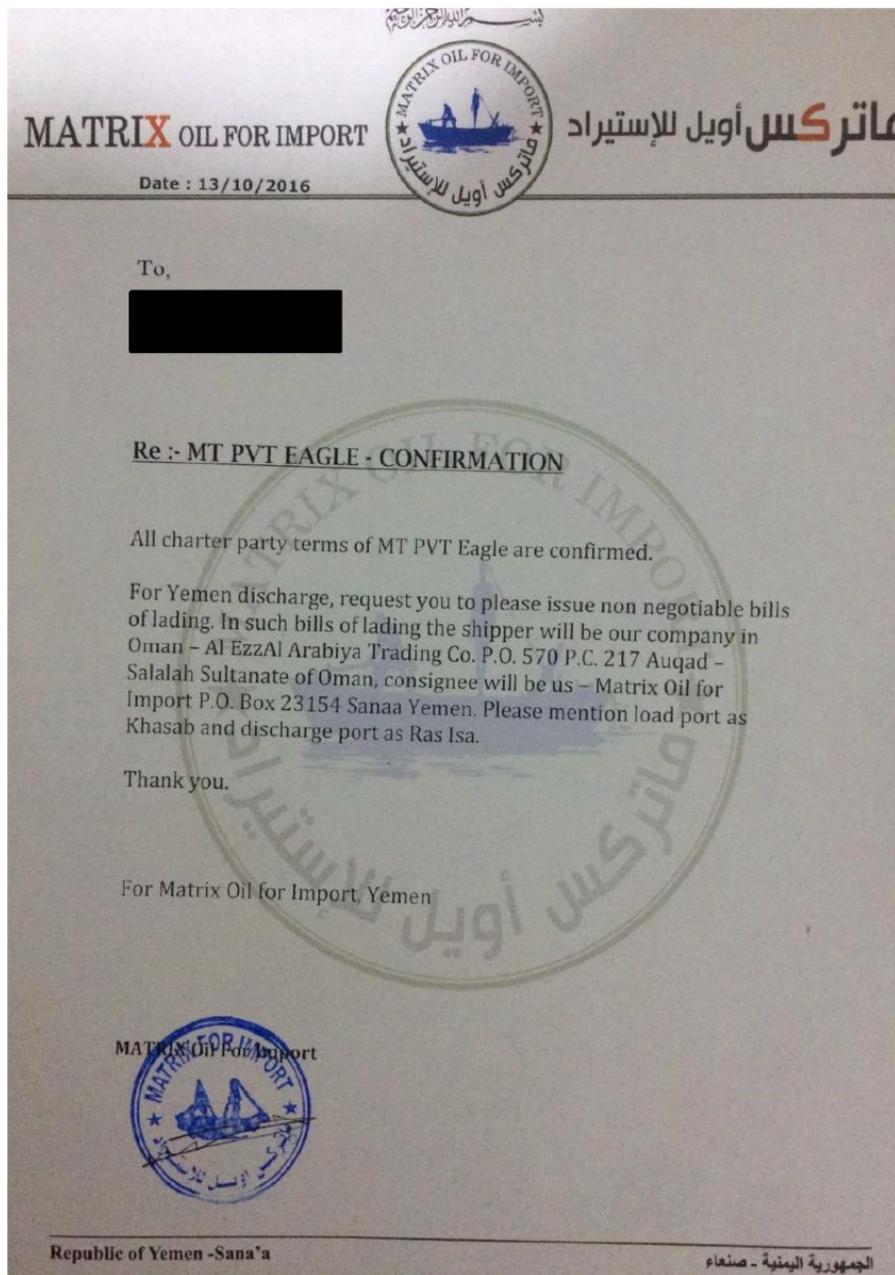
**Source:** Panel based on confidential documents.

<sup>100</sup> President Hadi, during his meeting with the Chair of the 2140 Committee in Riyadh, requested that Mohamed Abdusalam be sanctioned. The Panel sent a letter to the GoY in this respect, a reply is still pending.

**Figure 22.1.a**

Letter from Matrix Oil for Import requesting MT PVT Eagle to issue a B/L mentioning Khassab as a port of lading, 13 October 2016

Note: The letter also mentions that Matrix Oil owns Al Ezz Al Arabiya



Source: Confidential.

**Figure 22.1.b**

Charter agreement for MT PVT Eagle indicating that the port of lading was Mahshahr, Iran

**Page 1**

Performing vessel : MT PVT EAGLE, Q88 as attached.

C/P FORM : SHELL TIME 4

REGISTERED OWNERS : SOUTHERN PETROLEUM TRANSPORTATION JSC

SPEED/ CONSUMPTIONS : LO consumption on Owner's account

L3C : NAPHTHA/PALM OIL/METHANOL

LAST 10 POC : to be reverted

H&M VALUE : USD 12,500,000.00

CHARTERERS : MATRIX OIL FOR IMPORT  
SANAA, YEMEN

Please revert vessel arrival draft at discharge port basis

Gasoil (SG 0.83)

25,000MT 10.9m draft

26,000MT 11.2m draft

27,000MT 11.5m draft

**Page 2**

1. DELIVERY APS Bandar - E – Mahshahr, IRAN 

DELIVERY NOTICE: 10/7/5/3/2/1 DAYS NOTICE

2. LAYCAN : 14-18 OCT 2016

3. ONE (01) TIME CHARTER TRIP WITH CARGO OF GASOIL (ALWAYS CLEAN, UNLEADED, UNDARKER 2.5NPA) VIA UAE OR IRAN TO YEMEN PICO – DURATIONS ABOUT 20/40 DAYS WOG

4. RE-DELIVERY DLOSP 1SP FUJAIRAH ATDNSHINC

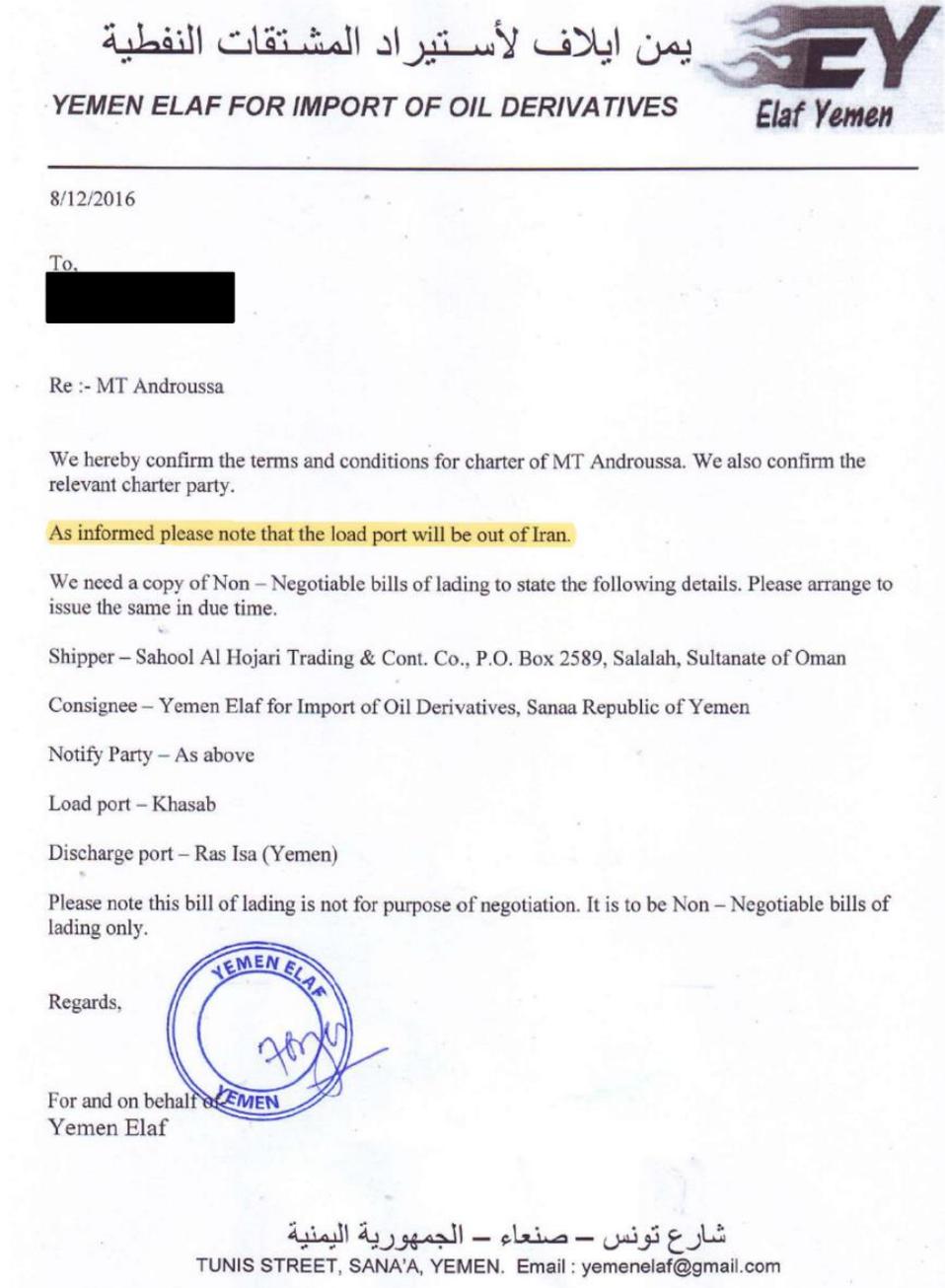
Redelivery: 10/7/5/3/2/1 day's notice

Source: Confidential.

**Figure 22.2.a**

Letter from Yemen Elaf for Import of Oil Derivatives requesting MT Androussa to issue a B/L mentioning Khassab as a port of lading, 8 December 2016

**Note:** The letter uses the same template the one used by al Barakah Republic Trading Company in Figures 22.3 and 22.4



**Source:** Confidential.

**Figure 22.2.b**

Charter agreement for MT Androussa indicating that the port of lading was Bandar Abbas, Iran

C/P DTD 08/12/16  
=====

Performing vessel : MT T ANDROUSSA  
C/P FORM : SHELL TIME 4. + OWNERS ADDITIONAL TERMS AS PER BELOW  
CHARTERERS : YEMEN ELAF FOR IMPORT OF OIL  
DERIVATIVES,  
SANA'A,  
REPUBLIC OF YEMEN

REGISTERED OWNERS: AS PER ATTACHED MATRIX  
[REDACTED]

SPEED/CONSUMPTIONS : AS PER ATTACHED MATRIX  
L3C : CLN UNLDD GASOIL / CLN UNLDD GASOLINE / CLN UNLDD GASOLINE  
LAST 10 POC : AS PER ATTACHED  
H&M VALUE : USD15MIO

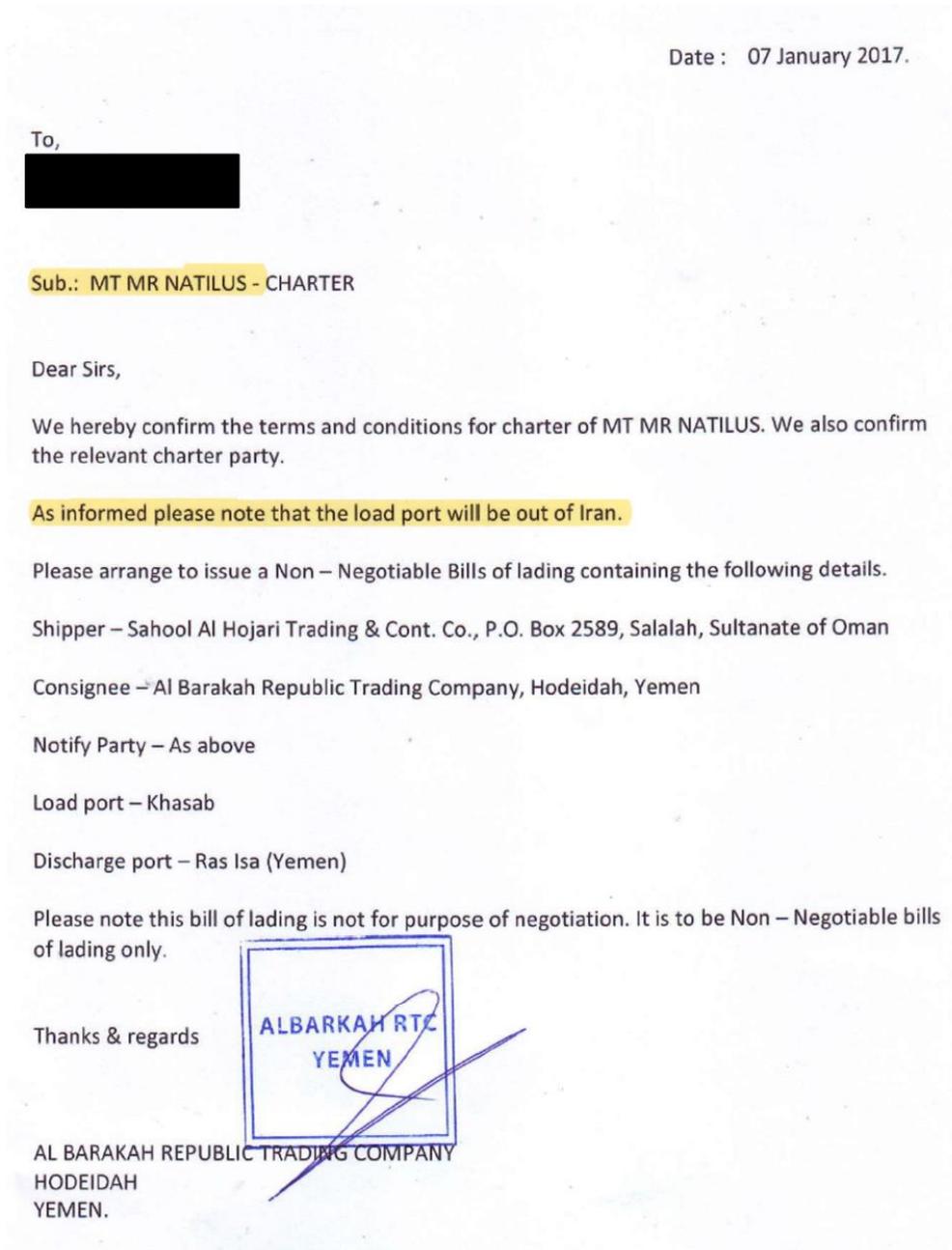
- 
1. DELIVERY APS BANDAR ABBAS ATDNHSHINC
  2. LAYCAN :09-10.12.2016
  3. ONE (01) TIME CHARTER TRIP WITH CARGO OF GASOIL CLN UNLDD UND MAX 2.5 NPA VIA IRAN TO YEMEN PICO – DURATIONS ABOUT 30/40 DAYS WOG
  4. RE-DELIVERY DLOSP 1SP FUJAIRAH ATDNHSHINC
  5. HIRE USD 18,500 PDPR INCLT
  6. CHARTERERS TO PAY HIRE WITHOUT PAYMENT OF BUNKERS TO OWNERS NOMINATED ACCOUNT IN USD OR UAE DIRHAM.
- CHRTRS CONFIRM THAT VESSEL WILL BE SUPPLIED WITH BUNKERS IN FUJAIRAH/KHORFAKAN FOR THE VOYAGE, but bunker used for loading operations and steaming to the Fujairah or Khor Fakkan for bunkering to be paid to owners . Charterers have right to deduct bunker payment made from last sufficient hire payment (as charterers are

Source: Confidential.

**Figure 22.3.a**

Letter from al Barakah Republic Trading Company requesting MT MR Nautilus to issue a B/L mentioning Khassab as the port of lading, 7 January 2017

Note: The letter uses the same template as the one used by Yemen Elaf for Import of Oil Derivatives in figure 22.2 above



**Source: Confidential.**

**Figure 22.3.b**

Charter agreement for MT Nautilus indicating that port of lading was Mahshahr, Iran

CP DATED 07 Jan 2017

CHARTERERS ALBARAKAH REPUBLIC TRADING COMPANY  
HODEIDAH  
YEMEN

[REDACTED]

CHARTER PARTY FORM ASBATANKVOY

VESSEL MT MR NATILUS , AS PER PROVIDED Q88

LAST 3 CARGOES GAS CONDENSATE / GAS CONDENSATE / GAS CONDENSATE

CARGO Gas Oil, 35000/40000 with 10pct molco. CHARTERERS' OPTION  
UPTO FULL VSL SAFE CAPACITY.

SEGREGATION MAX 1 GRADE WVNS

HEAT VESSEL TO MAINTAIN LOADED TEMPERATURE

LAYCAN 7/8 Jan 2017 (0001 - 2359 HRS)

LOADING PORT(S) : 1P/1B MAHSHAHR, IRAN 

DISCHARGING PORT(S) : 1P/1B RAS ISA, YEMAN

FREIGHT RATE : USD 850,000 BSS 1:1 LUMP SUM NET TO OWNER

- THE RATE IS INCLUSIVE OF ADDITIONAL WAR RISK INSURANCE PREMIUM, KIDNAP AND RANSOM INSURANCE, ARM GAURDS LOSS OF HIRE INSURANCE AND CREW WAR.

PAYMENT TERMS PAYMENT TO BE MADE TO OWNERS NOMINATED ACCOUNT IN  
USD/ UAE AED

OWNERS CONFIRM THAT VESSEL'S PNI COVERAGE IS VALID AS PER ATTACHED PNI CERT.

Charts nominated AGENT B ENDS / ALL MARINE DUES COSTS AND AGENCY FEE AT LOAD &

DISCHARGE PORT TO BE FOR OWNER.

ANY WHARFAGE OR CARGO DUES AT BENEDS TO BE ON CHARTERER'S ACCOUNT.

DEMURRAGE USD 16,500 PDPR

UNDISPUTED DEMURRAGE PAYABLE IN ADVANCE TO BE PAID IMMEDIATELY AFTER RECEIVING OWNERS DEMURRAGE INVOICE.

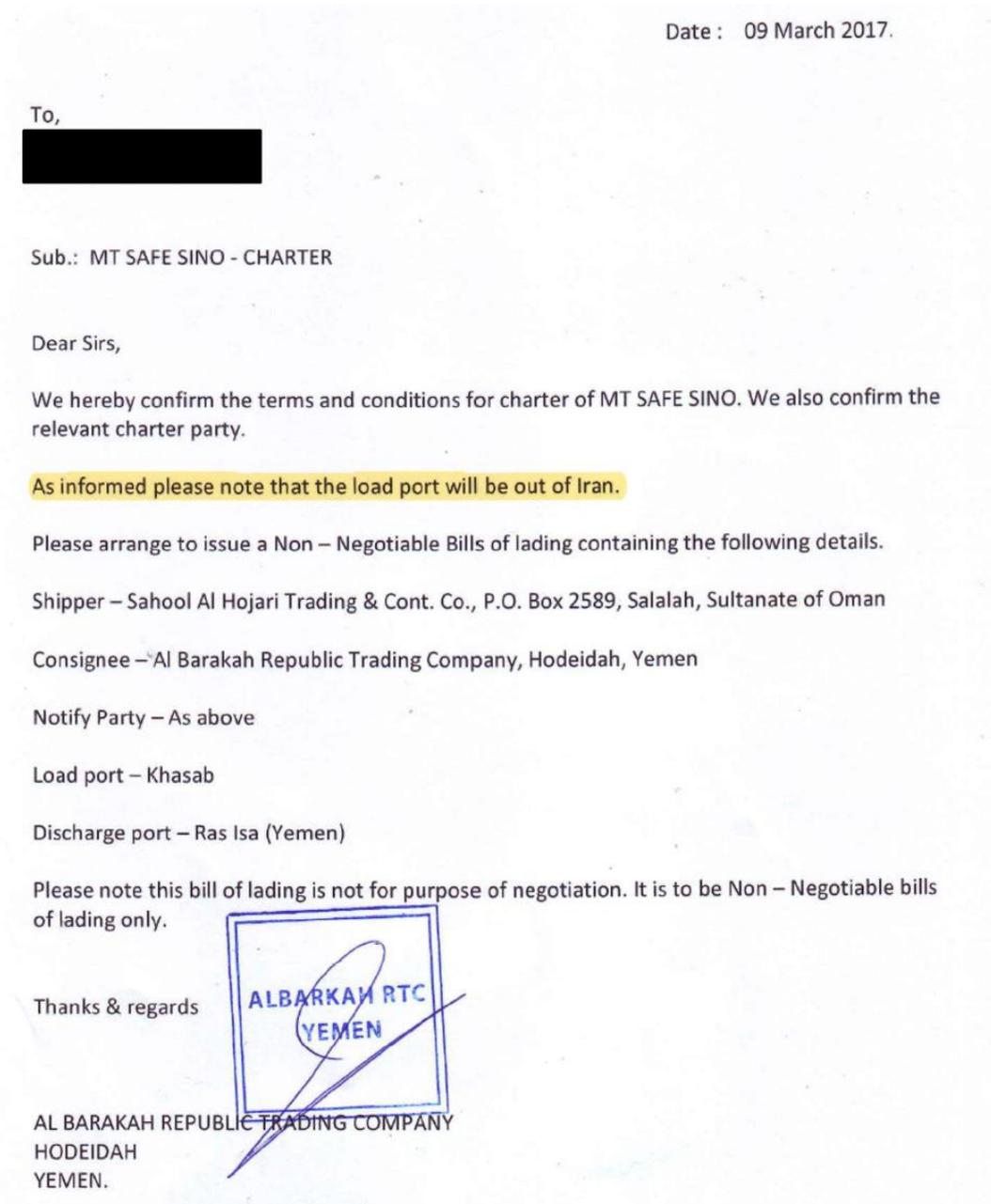
ALBARAKAH RTC  
YEMEN

Source: Confidential.

**Figure 22.4.a**

Letter from al Barakah Republic Trading Company requesting MT Safe Sino to issue a B/L with mention of Khassab as the port of lading, 9 March 2017

Note: The letter uses the same template as the one used by Yemen Elaf for Import of Oil Derivatives in figure 22.2 above.



**Source:** Confidential.

**Figure 22.4.b**

Charter agreement for MT Safe Sino Eagle indicating that the port of lading was in Iran

**Page 1**C/P DTD 09<sup>th</sup> March 2017

=====

Performing vessel : MT SAFE SINO

C/P FORM : SHELL TIME 4.

CHARTERERS : ALBARAKAH REPUBLIC TRADING COMPANY  
HODEIDAH  
YEMEN

REGISTERED OWNERS : EASY CONNECT LIMITED OOS

**SPEED/ CONSUMPTIONS :**

Average speed in knots	Maximum average bunker consumption	
	Main propulsion fuel oil/diesel oil	Auxiliaries fuel oil/diesel oil
Laden 12.50 knots on	IFO380 25.50MT	2.5 MT the same for 13.00knots if ballast
11.50 knots on	IFO380 23.00MT	2.5 MT the same for 12.00knots if ballast

Navigation MGO 0.1 mt,

Loading IFO380 5.0mt,

Discharging IFO380 7.0mt plus 7.0mt MGO if IGS used

Tank Cleaning IFO 380 6.0mt

Vessel's Bunker tanks capacity Fuel Oil 1735m3 , MGO (DIESEL OIL) 161m3

L3C : PALM/MEOH/ CPP

LAST 10 POC : BIK/FUJAI RAH/HAMYRIA/ASSALUYEH/NANTONG/NINGBO/PASIR  
GUDANG/MUMBAI/KANDLA

H&amp;M VALUE : USD14M



Page 2

1. DELIVERY APS 1SP FUJAIRAH ATDNHSHINC

2. LAYCAN : 14-18 MARCH.

Vessel arriving Mumbai ETB 1500LT today ETCD pm/9th

ETA Kandla am/10th ETCD am/12th if all going well

Master require about 2-3days tank washing in ballast to Fujairah

Thus ETA Fujairah 14-15/March for delivery

Owners will narrow into 3 days upon charters clean fixture confirmation

3. ONE (01) TIME CHARTER TRIP WITH CARGO OF gas oil VIA IRAN TO YEMEN PICO – DURATIONS ABOUT 30/40 DAYS WOG. ABOUT" MEANS PLUS OR MINUS 5DAYS WOG

4. RE-DELIVERY DLOSP 1SP FUJAIRAH ATDNHSHINC

CHARTERS TO GIVE MIN 12 DAYS REDELIVERY NOTICE THEREAFTER 7/5/3/2/1 DAYS REDELIVERY NOTICE

5. HIRE USD 17,000 PDPR INCLT

6. CHARTERERS TO PAY THE HIRE WITHOUT PAYMENT OF BUNKERS TO OWNERS NOMINATED ACCOUNT IN USD OR UAE DIRHAMS.

Source: Confidential.

**Annex 23. Taurus pistols delivered for Djibouti security forces and found in the black market in Sana'a**

**Figure 23.1**

Taurus PT 24/7 with serial number TGZ50281 for sale at a price of 2,800 USD on Telegram, by Abu Hashed Al Ghubary in Sana'a



Source: <https://t.me/slah3568>, 29 October 2019.

**Figure 23.2**

Taurus PT 24/7 with serial number TGZ51161 advertised for sale on Telegram, by an individual identified by phone number +967 771221102 in Sana'a, Yemen



Source: <https://t.me/slah3568>, 21 October 2019.

**Figure 23.3**

Taurus PT 24/7 with serial number TGZ51212 advertised for sale on Telegram, by an Ahmed Al Humaidi with phone number +967 771221102 in Sana'a, Yemen



Source: (@gunsseller) tweeted at 0:15 AM on Mon, Jun 11, 2018, account removed from Twitter.

## Annex 24. Alleged Forex manipulation

1. The Panel investigated the alleged manipulation of Forex rates within the financial system in Yemen. Forex has been a source of unjust enrichment since early 2015 when official movement of hard currency between Yemen and other countries ceased and several international banks stopped acting as correspondent banks for Yemeni banks. The Panel has reported in its midterm update to the Committee in July 2017 that:<sup>101</sup>

“The official exchange rate continues to be fixed at YER 250 per USD, however the market rates are YER 365 for cash and YER 400 for an LC. This has a major impact on humanitarian assistance agencies, which have to exchange at the official rate, but locally purchase aid at the market rate. This equates to an effective currency exchange loss of 32% and an equivalent loss of purchasing power.”

2. The Panel received information from individuals with connections to Yemeni private banks that a number of banks made a large profit at that time from handling cash transfers to Yemen for international organizations and UN programmes and agencies.<sup>102</sup> One bank made a profit of more than 300 million USD for transferring one billion USD to Yemen. The YER rate to the USD in Yemeni markets started to move away from the official rates since early 2015,<sup>103</sup> see figure 24.1. The UN however, did not align its operational rate with the market until August 2017.<sup>104</sup>

3. The Forex rate continued to increase reaching 500 YER to 1 USD in June 2019. The rate decreased in June probably following the first issuance of Letters of Credit (LC) by CBY Aden financed by the Saudi deposit. This event initiated the economic warfare between GoY, supported by KSA, and the Houthis. The Houthis started to see that the issuance of LC by CBY Aden as a means by GoY to syphon the liquidity from areas under their control to Aden.<sup>105</sup> This would have also allowed CBY Aden to be the sole entry point for remittances and external finance aid. The Houthis started to put pressure on banks and traders to prohibit any transfer of cash to CBY Aden or to use newly printed banknotes by GoY. Banks were only allowed to transfer funds by checks which, in reality, had lost their value as a mean of payment. Checks are settled in Yemen only through specific networks at less than 70% of their value.

4. In October 2017, there were indications that the financial position of CBY had improved with less pressure to seek hard currencies. The clearance process for LC funded by the Saudi deposit improved significantly, with about 245 million USD cleared between 27 October and 4 December 2018 compared to less than 37 million USD between June and October 2019, see figure 24.2 below. Moreover, beginning in November 2018, CBY was released from the burden of financing imports of fuel for the Aden's municipal electric power stations, since fuel had been donated in kind by KSA.<sup>106</sup>

5. Within this context, CBY between October and December 2019 was in a better position to provide hard currency in the Forex market as a monetary policy tool - if it wanted to decrease the rate and stabilize the volatility. As it has been stated in this report and demonstrated below, the Panel observed the contrary where CBY purchased more and more hard currencies starting in late October 2018.

6. The Panel is aware that this allegation of Forex manipulation was a part of a publicized personal confrontation between Hafedh Mayad, the head of the Economic Committee and advisor to President Hadi and Mohamed Zemam, the Governor of CBY with political agenda ramifications with other GoY officials. The Panel has therefore avoided using findings and justifications by either of the two officials. The Panel, in line with its methodology, attempted to use data which could be verifiable from the banks connected to this allegation. While these banks informed the Panel that they were ready to cooperate with any future investigations, GoY has so far not provided any information or observations with regards to access of CBY archives. Between the events of August 2019 in Aden and the date of submission of this report, there were, on occasions, reports that CBY Aden - without GoY control - had moved the archives to undisclosed locations.

<sup>101</sup> See also paragraph 148 of S/2018/68.

<sup>102</sup> This include cash transfers by UNDP and UNICEF funded by the International Development Association, see paragraph 111 (S/2019/83).

<sup>103</sup> 215 YER in early 2015, 250 YER in mid early 2017 until GoY decided to float its currency on 15 August 2017.

<sup>104</sup> <https://treasury.un.org/operationalrates/OperationalRates.php>.

<sup>105</sup> There were also cases of rejection by CBY and KSA of LC applications by traders from Houthi controlled areas, see paragraph 116 to 119 of (S/2019/83).

<sup>106</sup> See paragraph 123 of (S/2019/83). Donation of fuel by KSA was suspended in early 2019, reportedly as a result of difficulties in monitoring the distribution to electricity generation plants.

7. The Panel conducted its analysis using elements from the following table:

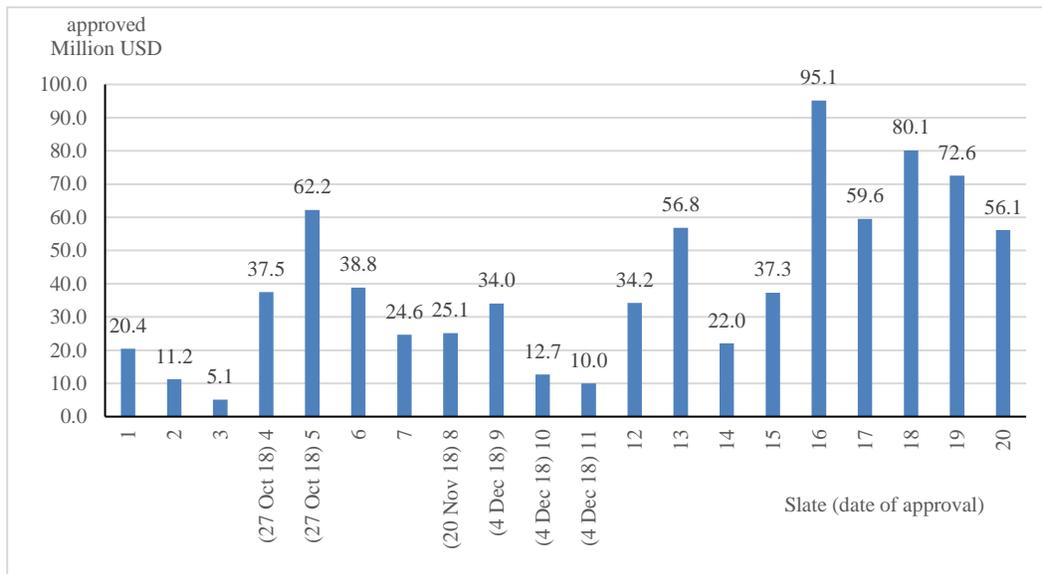
<b>Reference</b>	<b>Reference</b>
Hafedh Mayad posted a table comprising 28 Forex transactions by CBY from 4 to 29 November 2018 showing the difference between the market and the agreed rates which resulted to a loss by the bank of 8,969 million YER. The Panel analysed 69 transactions comprising sales and purchases of hard currencies and used slightly different market rates obtained from a Telegram Chanel. The Panel also used a different methodology analysing the balance sheet of CBY for the Forex transactions. This analysis allowed to identify the loss of CBY by comparing the value in USD of the final amount of hard currencies held by CBY and the value in USD of its liability in YER. The Panel found that CBY lost 24,766,614 USD	Figure 24.2.b Table 24.1.a Table 24.1.b
The Panel compared the purchase and sale rate with market rate to identify the spread. The graphic also allowed to identify the effect of the rate applied for the application for LCs financed by the Saudi deposit	Figure 24.3 Figures 24.4.a and b

**Figure 24.1.a**  
Long term trends of Forex rate (YER to USD) in Yemen 2016 to 2019



Source: Economic Committee (GoY)

**Figure 24.1.b**  
Approval of documentary credit from the Saudi deposit (July 2018 to May 2019)



Source: Panel based on data from the Economic Committee (GoY).

**Figure 24.2.a**

Letter from Hafedh Fakher Mayad, advisor to President Hadi and Head of the Economic Committee, to the Prime Minister of Yemen dated 6 December 2018

The letter requests the Prime Minister of Yemen to allow the Supreme National Authority for Combatting Corruption to investigate cases of corruption associated with the purchase and sale of hard currencies by CBY from 4 to 29 November 2018



Source: [https://m.facebook.com/story.php?story\\_fbid=241242340143182&id=100027722542809&sfnsn=mo](https://m.facebook.com/story.php?story_fbid=241242340143182&id=100027722542809&sfnsn=mo).

Figure 24.2.b

Exchange transactions of SAR against YER between CBY main office Aden and Al-Kuraimi Islamic Bank from 11 October 6 December 2018

**جدول الفوارق بين أسعار السوق وأسعار الشراء للعملة (ريال سعودي)**

**خلال الفترة ٢٠١٨/١١/٤ - ٢٠١٨/١١/٢٩ م**

التاريخ	سعر السوق	سعر الشراء	الفارق	المبلغ المشتري	اجمالي الفارق
٢٠١٨/١١/٤	١٦٠	١٩٥	٣٥	١٦,٠٠٠,٠٠٠	٥٦٠,٠٠٠,٠٠٠
٢٠١٨/١١/٥	١٦٩	١٩٧	٢٨	٢٠,٠٠٠,٠٠٠	٥٦٠,٠٠٠,٠٠٠
	١٦٩	١٨٧	١٨	٦,٠٠٠,٠٠٠	١٠٨,٠٠٠,٠٠٠
٢٠١٨/١١/١٩	١٥٣	١٧٧	٢٤	٣,٠٠٠,٠٠٠	٧٢٠,٠٠٠,٠٠٠
	١٥٣	١٧٩	٢٦	١٠,٠٠٠,٠٠٠	٢٦٠,٠٠٠,٠٠٠
٢٠١٨/١١/٢١	١٤٠	١٥٢,٥	١٢,٥	٤,٠٠٠,٠٠٠	٥٠,٠٠٠,٠٠٠
	١٤٠	١٦١	٢١	٢,٠٠٠,٠٠٠	٤٢٠,٠٠٠,٠٠٠
	١٤٠	١٥٧	١٧	٦,٠٠٠,٠٠٠	١٠٢,٠٠٠,٠٠٠
	١٤٠	١٦٣	٢٣	٢,٥٠٠,٠٠٠	٥٧,٥٠٠,٠٠٠
	١٤٠	١٦١	٢١	٣,٠٠٠,٠٠٠	٦٣,٠٠٠,٠٠٠
	١٤٠	١٦٢	٢٢	٣٥,٠٠٠,٠٠٠	٧٧٠,٠٠٠,٠٠٠
	١٤٠	١٥٢,٥	١٢,٥	١٥,٠٠٠,٠٠٠	١٨٧,٥٠٠,٠٠٠
	١٤٠	١٦٢	٢٢	٨,٠٠٠,٠٠٠	١٧٦,٠٠٠,٠٠٠
	١٤٠	١٥٢,٥	١٢,٥	٢,٠٠٠,٠٠٠	٢٥,٠٠٠,٠٠٠
	١٤٠	١٥٧	١٧	٢,٠٠٠,٠٠٠	٢٤٠,٠٠٠,٠٠٠
	١٤٠	١٥٦	١٦	٢,٠٠٠,٠٠٠	٢٢٠,٠٠٠,٠٠٠
	١٤٠	١٦٢	٢٢	١٢,٠٠٠,٠٠٠	٢٦٤,٠٠٠,٠٠٠
	١٤٠	١٥٧	١٧	١٥,٠٠٠,٠٠٠	٢٢٥,٠٠٠,٠٠٠
٢٠١٨/١١/٢٢	١٤٤	١٦٢	١٨	٢٧,٠٠٠,٠٠٠	٤٨٦,٠٠٠,٠٠٠
	١٤٤	١٦٠	١٦	١,٠٠٠,٠٠٠	١٦٠,٠٠٠,٠٠٠
	١٤٤	١٤٧,٥	٣,٥	١,٠٠٠,٠٠٠	٣٥,٠٠٠,٠٠٠
٢٠١٨/١١/٢٩	١٢٢	١٤٢	٢٠	٣,٠٠٠,٠٠٠	٦٠٠,٠٠٠,٠٠٠
	١٢٢	١٤٢	٢٠	١٥,٠٠٠,٠٠٠	٣٠٠,٠٠٠,٠٠٠
	١٢٢	١٤٣	٢١	٣,٠٠٠,٠٠٠	٦٣٠,٠٠٠,٠٠٠
	١٢٢	١٤١	١٩	١٢,٠٠٠,٠٠٠	٢٢٨,٠٠٠,٠٠٠
	١٢٢	١٤٢	٢٠	٥,٠٠٠,٠٠٠	١٠٠,٠٠٠,٠٠٠
	١٢٢	١٤٥	٢٣	١,٠٠٠,٠٠٠	٢٣٠,٠٠٠,٠٠٠
	١٢٢	١٤٢	٢٠	١,٠٠٠,٠٠٠	٢٠٠,٠٠٠,٠٠٠
					٨,٩٦٩,٠٠٠,٠٠٠

**اجمالي مبلغ الفارق بين أسعار السوق وأسعار الشراء**

Source: [https://m.facebook.com/story.php?story\\_fbid=241242340143182&id=100027722542809&sfnsn=mo](https://m.facebook.com/story.php?story_fbid=241242340143182&id=100027722542809&sfnsn=mo).

**Table 24.1.a**

Transactions with Al-Kuraimi Islamic Bank from 11 October 6 December 2018 (Accounts Kuraimi at CBY)

Ser	Date request	Date Recording	Market rate <sup>107</sup>	Agreed rate	Sale USD	Purchase SAR	Sale SAR	Account in YER
1	11-Oct	11-Oct	189	190.5			(20,000,000)	3,810,000,000
2	11-Oct	13-Oct	189	190.5			(20,000,000)	3,810,000,000
3	11-Oct	11-Oct	189	185		20,000,000		(3,700,000,000)
4	28-Oct	5-Nov	196	197			(20,000,000)	3,940,000,000
5	30-Oct	31-Oct	196	197.5			(6,000,000)	1,185,000,000
6	30-Oct	31-Oct	196	198			(9,000,000)	1,782,000,000
7	4-Nov	4-Nov	160	195			(16,000,000)	3,120,000,000
8	5-Nov	5-Nov	170	187			(6,000,000)	1,122,000,000
9	6-Nov	8-Nov	180	167		5,000,000		(835,000,000)
10	7-Nov	8-Nov	170	168		2,500,000		(420,000,000)
11	7-Nov	11-Nov	170	168		10,000,000		(1,680,000,000)
12	14-Nov	15-Nov	174	170		9,000,000		(1,530,000,000)
13	15-Nov	19-Nov	173	180			(10,000,000)	1,800,000,000
14	17-Nov	19-Nov	158	177			(30,000,000)	5,310,000,000
15	20-Nov	21-Nov	140	163			(2,500,000)	407,500,000
16	20-Nov	21-Nov	140	161			(30,000,000)	4,830,000,000
17	20-Nov	21-Nov	140	162			(35,000,000)	5,670,000,000
18	20-Nov	21-Nov	140	161			(20,000,000)	3,220,000,000
19	20-Nov	21-Nov	140	156			(20,000,000)	3,120,000,000
20	20-Nov	22-Nov	140	162			(35,000,000)	5,670,000,000
21	20-Nov	22-Nov	140	160			(10,000,000)	1,600,000,000
22	21-Nov	21-Nov	140	152.5			(4,000,000)	610,000,000
23	21-Nov	21-Nov	140	157			(6,000,000)	942,000,000
24	21-Nov	21-Nov	140	152.5			(15,000,000)	2,287,500,000
25	21-Nov	21-Nov	140	157			(20,000,000)	3,140,000,000
26	21-Nov	21-Nov	138	162			(12,000,000)	1,944,000,000
27	21-Nov	21-Nov	140	157			(15,000,000)	2,355,000,000
28	21-Nov	21-Nov	140	571			(2,000,000)	1,142,000,000
29	22-Nov	22-Nov	144	147.5			(10,000,000)	1,475,000,000
30	25-Nov	25-Nov	143	143		15,000,000		(2,145,000,000)
31	26-Nov	29-Nov	138	143			(30,000,000)	4,290,000,000
32	26-Nov	29-Nov	138	142			(5,000,000)	710,000,000
33	26-Nov	29-Nov	138	145			(10,000,000)	1,450,000,000
34	26-Nov	29-Nov	138	142			(10,000,000)	1,420,000,000
35	26-Nov	29-Nov	517	539	(1,500,000)			808,500,000
36	27-Nov	29-Nov	130	142			(30,000,000)	4,260,000,000
37	27-Nov	29-Nov	130	142			(15,000,000)	2,130,000,000
38	27-Nov	29-Nov	130	141			(12,000,000)	1,692,000,000
39	27-Nov	3-Dec	130	142			(60,000,000)	8,520,000,000
40	27-Nov	3-Dec	487	534	(2,000,000)			1,068,000,000
41	28-Nov	3-Dec	110	136			(13,000,000)	1,768,000,000
42	28-Nov	9-Dec	110	136			(24,000,000)	3,264,000,000

<sup>107</sup> SAR exchange rate calculated based on USD exchange rate provided in **annex 9** and reportedly used by Al-Kuraimi as a market rate with its customers; SAR exchange rate = USD exchange rate/3.75, as 1 USD=3.75 SAR.

Ser	Date request	Date Recording	Market rate <sup>107</sup>	Agreed rate	Sale USD	Purchase SAR	Sale SAR	Account in YER
43	28-Nov	23-Dec	110	136			(40,000,000)	5,440,000,000
44	28-Nov	3-Dec	412	512	(8,500,000)			4,352,000,000
45	28-Nov	3-Dec	412	512	(1,500,000)			768,000,000
46	28-Nov	6-Dec	412	512	(3,000,000)			1,536,000,000
47	29-Nov	4-Dec	110	121			(1,500,000)	181,500,000
48	29-Nov	6-Dec	110	121			(15,000,000)	1,815,000,000
49	28-Nov	3-Dec	110	136			(12,000,000)	1,632,000,000
50	28-Nov	6-Dec	412	455	(3,000,000)			1,365,000,000
51	5-Dec	6-Dec	132	123		15,000,000		(1,845,000,000)
52	5-Dec	6-Dec	132	131		15,000,000		(1,965,000,000)
53	5-Dec	9-Dec	132	128		8,006,200		(1,024,793,600)
54	6-Dec	9-Dec	135	131		9,500,000		(1,244,500,000)
55	6-Dec	9-Dec	135	136		10,000,000		(1,360,000,000)
56	6-Dec	12-Dec	135	135		10,000,000		(1,350,000,000)
57	6-Dec	12-Dec	135	135		2,000,000		(1,350,000,000)
58	6-Dec	12-Dec	135	135		6,000,000		(270,000,000)
59	6-Dec	12-Dec	135	135		10,000,000		(810,000,000)
					(19,500,000)	147,006,200	(651,000,000)	91,232,706,400

Source: Panel based on documents obtained from confidential sources.

**Table 24.1.b**

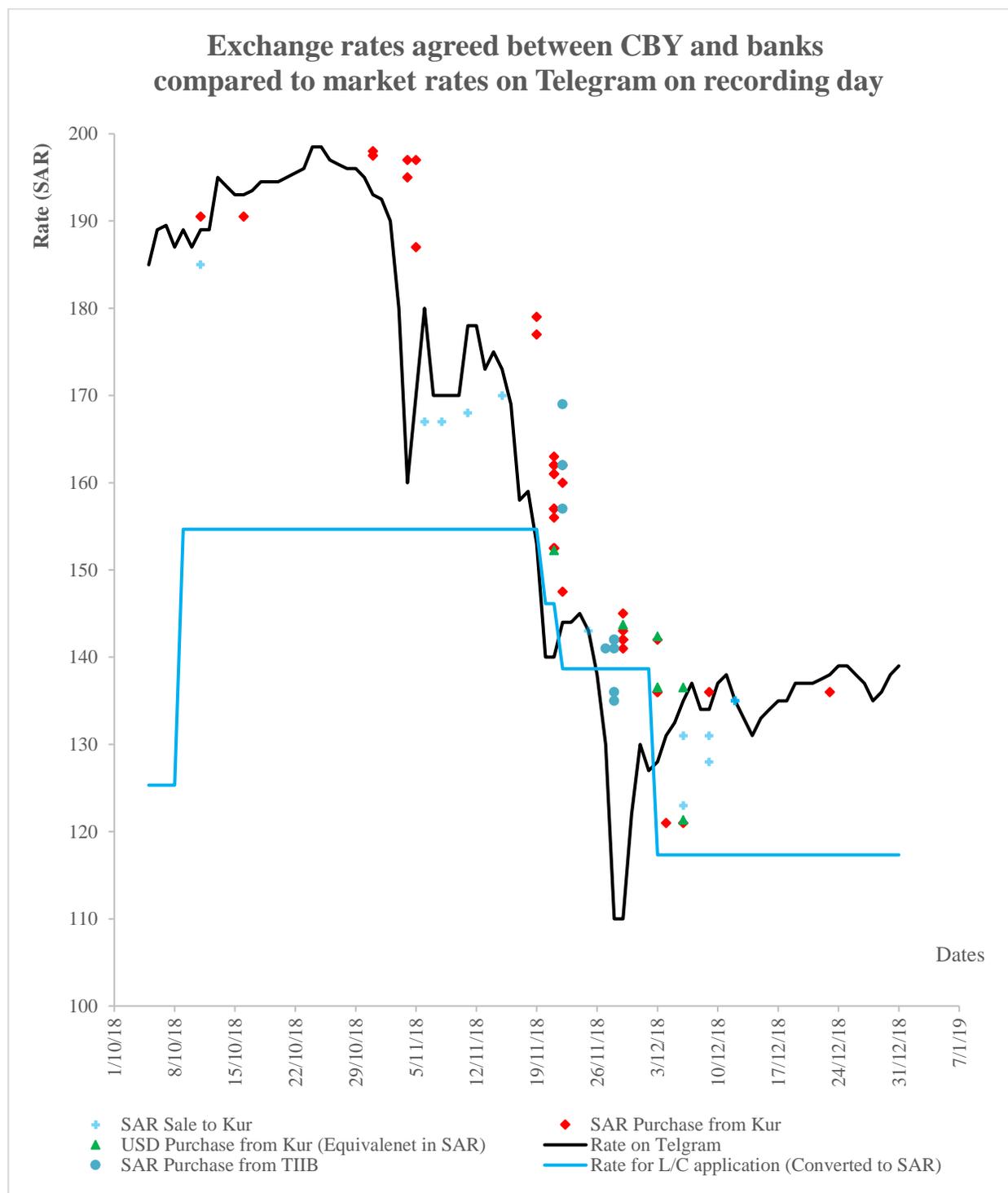
Transactions with Tadhamon International Islamic Bank from 22 to 28 November 2018 (Accounts TIIB at CBY)

Ser	Date request	Date transaction	Market rate <sup>108</sup>	Agreed rate	Sale USD	Purchase SAR	Sale SAR	Account in YER
1	22-Nov	22-Nov	144	169			(10,000,000)	1,690,000,000
2	22-Nov	22-Nov	144	157			(11,800,000)	1,852,600,000
3	22-Nov	22-Nov	144	162			(6,200,000)	1,004,400,000
4	26-Nov	27-Nov	130	146			(10,000,000)	1,460,000,000
5	27-Nov	29-Nov	110	141			(4,200,000)	592,200,000
6	27-Nov	29-Nov	110	142			(40,000,000)	5,680,000,000
7	28-Nov	28-Nov	110	141			(10,000,000)	1,420,000,000
8	28-Nov	28-Nov	110	135			(6,000,000)	816,000,000
9	28-Nov	28-Nov	110	140			(800,000)	112,800,000
10	28-Nov	28-Nov	110	135			(10,760,000)	1,452,600,000
							(109,760,000)	16,080,600,000

Source: Panel based on documents obtained from confidential sources.

<sup>108</sup> Rate for YER from Telegram; SAR exchange rate = USD exchange rate/3.75, as 1 USD=3.75 SAR.

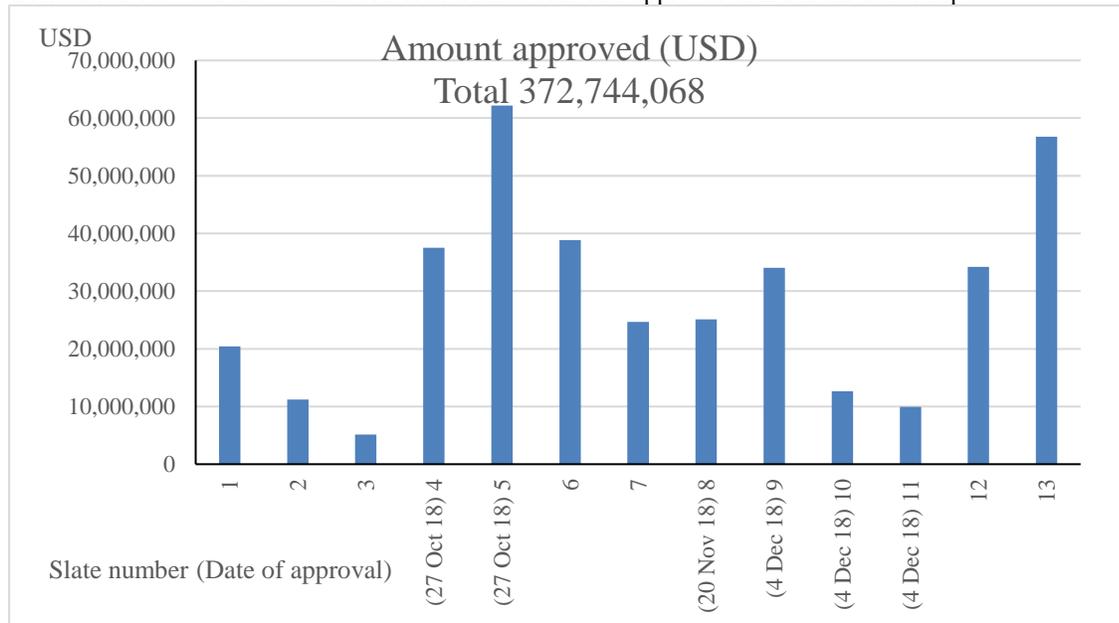
**Figure 24.3**  
Comparison of Forex rates from October to December 2018



Source: Panel based on data of tables 24.1.a and b.

**Figure 24.4.a**

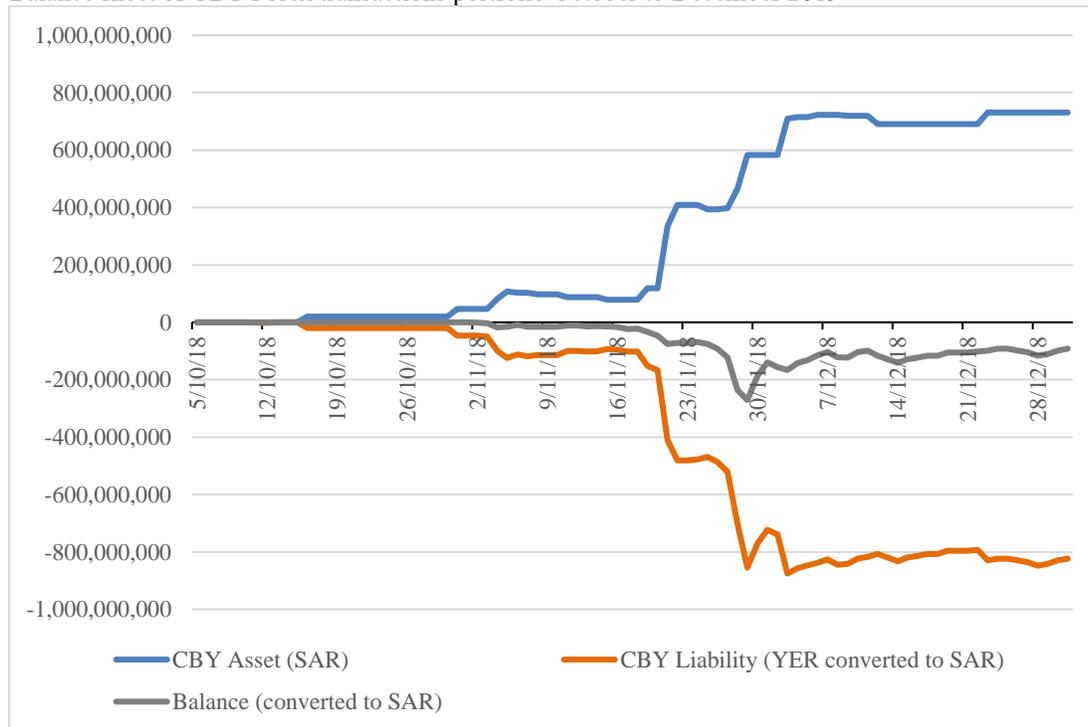
Correlation between the volume of Forex transactions and approval of LC from Saudi deposit



**Source:** Panel based on data from the Economic Committee (some dates are not known by the Panel).

**Figure 24.4.b**

Balance sheet of CBY Forex transactions portfolio October to December 2019



**Source:** Panel based on data of tables 24.1.a and b.

**Figure 24.5**

Last participation of the Economic Committee in the Intervention Committee, 12 November 2018

**Translation highlighted text:**

1. Rate on 12 November 2018: 1 SAR = 178.5 to 180 YER, 1 USD = 669.4 to 675 YER
2. The Economic Committee suspended its participation in the Intervention Committee and considered the CBY accountable for failures in implementing Decrees 75 and 76 and for allowing speculation by exchange companies.

بسم الله الرحمن الرحيم التاريخ: 2018/11/12م

ملخص نتائج ممارسة اللجنة الاقتصادية لمهامها من العاصمة المؤقتة عدن لليوم

**الواحد و الأربعين**

أولاً: متوسط أسعار الصرف و متابعات التغيرات في السوق:

اليوم	التاريخ	أسعار الصرف في عدن		أسعار الصرف في صنعاء	
		ريال سعودي	دولار أمريكي	ريال سعودي	دولار أمريكي
الأثنين	12-11-2018	178.5	669.4	180	675

تحسن سعر العملة في عدن و صنعاء بشكل طفيف كما يشير الجدول أعلاه بسبب اخبار تمرير بعض اعتمادات السلع الأساسية و توجه التجار لبيع جزء من رصيدهم من العملة الأجنبية في السوق ليتمكنوا من سداد قيمة تلك الاعتمادات بالريال اليمني إلى البنك المركزي.

**ثانياً: اجتماعات اللجنة الاقتصادية:**

عقدت اللجنة اجتماعها الدوري مع كبار الصرافين في مدينة عدن، برئاسة محافظ البنك المركزي، وبحضور أمين عام مجلس الوزراء، و تم مناقشة التطورات في السوق، و نتائج تطبيق القرارات التي تم الاتفاق عليها، و قد صرح محافظ البنك المركزي أمام الصرافين بأنه لن يقدم أي خدمات مالية أو مصرفية لتجار المشتقات النفطية، و أنه قدم خدماته فقط لشركة النفط اليمنية، و تاجر المشتقات أحمد العيسى و لن يقدم خدماته لغيرهما، و حمل اللجنة المسؤولية المصرفية لخدمة تجار المشتقات و تبعات تطبيق الية ضبط و إدارة تجارة المشتقات النفطية، و بشكل مخالف للقرار 75 و ضرباً بالحائط بكل مسؤوليات البنك المركزي في إدارة و ضبط القطاع المصرفي و إدارة السياسة النقدية للبلاد.

و عليه فقد قررت اللجنة التوقف عن حضور الاجتماعات الدورية مع الصرافين في مدينة عدن، و تحميل البنك المركزي مسؤولية تعطيل القرارات الحكومية 75 و 76 ، و عودة التجار للمضاربة في السوق السوداء، و حدوث أي انهيار جديد للعملة في المستقبل.

Source: Confidential

## Annex 25. Levant Vision money laundering for the Houthis

1. The Panel found that Levant Vision, a company incorporated in Yemen on 20 September 2012 may have been involved since late 2015 in money laundering for the benefit of the Houthis forces. The trade certificate of the company indicates commercial activity for the supply of medicine, food, medical equipment, spare parts for transport, agriculture and electronic equipment, see figure 25.1.
2. The Panel has evidence that indicates the company has used its bank accounts at Yemen Kuwait Bank (YKB) to transfer funds from CBY, Sana'a which were withdrawn in cash for three individuals most likely Houthi leaders of the revolutionary committee or Houthi field commanders. These are Mohamed Abdullah Mohamed Hassan Al Moayed, Abdullah Abbas Abdullah Jahaf<sup>109</sup> and Ali Qassem Mohsen Al Ameer with family names indicating their Hashemite affiliation with sympathy with the Houthis.
3. Documents obtained by the Panel indicate that Levant Vision signed a contract, on 1 March 2016, with Salim Assaifi, a finance delegate for the security sector of the revolutionary committee in Sana'a, for the supply of wheat and rice at a price of 1.869,000,000 YER, see figure 25.2. The Panel also obtained a copy of a form used by the Yemeni ministry of finance as a justification for appropriation of funds from CBY, see figure 25.3.
4. The Panel has evidence that was used to establish the cash flow of two accounts 01394970013027 and 01394970023027 (YER and USD respectively) at YKB, see table 25.1. The Panel noted that the portfolio of these two accounts converted to USD showed significant movement of funds with a combined balance reaching about 12 million USD. The Panel also noted two transfers from CBY of 1,869,000,000 YER and 2,976,379,560 YER on 10 and 18 May 2016 (total 4,845,379,560 YER). The first amount corresponded exactly to the price of the contract mentioned above. The total value of the two transfers amounted to about 19 million USD at that time.
5. The cashflow also indicates that within a week or two of the transfer from CBY to YKB, 4,559,000,000 YER of cash has been withdrawn: 370,100,000 YER by Abdullah Abbas Abdullah Jahaf, 2,098,900,000 YER Ali Qassem Mohsen Al Ameer and 2,090,000,000 YER by Mohamed Abdullah Mohamed Hassan Al Moayed. The Panel could not identify if any of these three individuals were traders that could have supplied the wheat and rice for Levant Vision. Moreover, all indications are that the appropriation of funds from CBY by the ministry of finance for the benefit of the revolutionary committee considered as an armed group is completely illegal and was done without any respect of budgetary rules and procedures.
6. The Panel has therefore grounds to believe that the two transactions were fake with no supply of goods but only used as a cover up for diversion of state funds for the benefit of the Houthis. These transactions show how public officials from the ministry of finance and the management of CBY Sana'a have misused their authority and involve YKB in money laundering with the risk of damaging the credibility of the bank with a negative impact on its shareholders and customers.

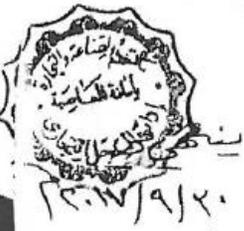
<sup>109</sup> A Houthi commander under the name of Abdullah Abbas Jahaf was reportedly killed in February 2019 by a coalition airstrike while fighting in Hajour, Hajjah see <https://www.alarabiya.net/ar/arab-and-world/yemen/2019/02/01/اليمن-مقتل-قيادي-حوثي-بغارات-اللتحالف-في-حجة>.

Figure 25.1

Trader licence of Levant Vision with a director named Safwa Ahmed Lotf al Ammari, valid from September 2012 to September 2017

٢٠١٧/٩/٢



  
 القيد في السجل التجاري

رقم صحيفة السجل التجاري: ٢٠١٢٠١٠٨١٧  
 تاريخ القيد: ٢٠١٢/٩/٢

تم القيد في سجل المستوردين تحت رقم: ٩٤٤٠٥  
 صفت هذه البطاقة من إدارة السجل التجاري  
 بمحافظه: حماه بصفا أحمد لطف العماري بتاريخ: ٢٠١٢/٩/٢  
 ويسمح لحاملها بمزاولة استيراد السلع الموضحة سابقاً لمدة عامين  
 تاريخ انقضاءها إلا إذا جددت.

مدير إدارة: عبد السلام  
 مدير السجل التجاري: خالد  
 مدير إدارة: خالد  
 مدير إدارة: خالد

صدرت هذه البطاقة من إدارة السجل التجاري بتاريخ: ٢٠١٢/٩/٢

٢٠١٧/٩/٢

اسم التجار: صفوان أحمد لطف العماري  
 جنسيته: سوري  
 الاسم التجاري: لصفا أحمد لطف العماري للاستيراد  
 العنوان: محافظة حماه حماه مدينة: حماه  
 صياغة: صياغة  
 رأس المال: ١٠٠ مليون ليرة سورية  
 اول تاريخ لمزاولة التجارة بالجمهورية: ٢٠١٢/٩/٢  
 نوع النشاط: تاجر واستيراد بالدرجة ( )  
 اسم وجنسية المدير المسؤول: صفوان أحمد لطف العماري  
 نوع السلع المستوردة: لجميع مجموعات سلعها  
 (١) ادوية  
 (٢) وسائل نقل  
 (٣) قطع غيار  
 (٤) اكسسوارات  
 (٥) اجهزة  
 (٦) الكومبيوترات  
 (٧) معدات

Source: Confidential.

Figure 25.2

Contract between Levant Vision and Salim Assaifi, finance delegate for security sector of the revolutionary committee for supply of wheat and rice for the price of 1.869,000,000 YER, 1 March 2016

الرقم:  
التاريخ:  
الموافق:



الجمهورية السورية  
اللجان الثورية  
الجانب الأمني

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### عقد اتفاق

تم الاتفاق بين كل من الجانب الأمني للجان الثورية في امانة العاصمة صنعاء ويمثلها الأخ/ علي سالم الصيفي المسؤول المالي في الجانب الأمني ويشار إليها في هذا العقد بـ (الطرف الأول).

وبين الأخوة/ شركة ليفانت فيجن للاستيراد ومقرها صنعاء شارع القيادة وتحمل سجل تجاري رقم (9445) صادر من الامانة بتاريخ: 2012/09/30م ويمثلها المدير العام للشركة الأخ/صفوان أحمد لطف ويشار إليها في هذا العقد بـ (الطرف الثاني).

وقد اتفق الطرفان على الآتي:

- يلتزم الطرف الثاني بتوفير احتياجات الجبهات الأمنية من المواد الغذائية والاحتياجات الخاصة بالجبهات الأمنية في امانة العاصمة والمحافظات في الجمهورية بحسب الجدول التالي:

الرقم	اسم الصنف	الكمية	سعر الوحدة	السعر الاجمالي
1	قمح استرالي عبوة 50 كيلو	200,000	5000	1,000,000,000
2	رز بسمتي درجة اولى عبوة 25 كيلو	86,900	10,000	869,000,000
اجمالي القيمة: فقط مليار وثمانمائة وتسعة وستين مليون ريال يعني لا غير				1,869,000,000

وعلى ان يتم التوريد بموجب رسالة رسمية محرره وموقعة من الطرف الأول يحدد فيها الاصناف والكميات والقيمة الاجمالية ومكان التسليم.

- اتفق الطرفان على أن تكون صلاحية المواد الموردة من الطرف الثاني صالحة لمدة عام واحد على الأقل.
- اتفق الطرفان على تحرير سند توريد مخزني من الطرف الأول لما تم توريده بعد فحص واستلام المواد مباشرة والتأكد من مواصفاتها المطلوبة من الطرف الثاني وفي حالة مخالفة المواصفات المطلوبة يتحمل الطرف الثاني المسؤولية ولا يتم استلامها منه.
- التزم الطرف الأول بصرف مبلغ وقدره (1,869,000,000) فقط مليار وثمانمائة وتسعة وستين مليون ريال يعني لا غير مقدما كعهدة على الطرف الثاني بموجب شيك بنكي كضمان يتم اعادته للطرف الثاني بعد اخلاء عهدة الطرف الثاني بموجب سندات الاستلام المخزنية المحرره والمعمدة من الطرف الأول.
- مدة هذا العقد ثلاثة أشهر من تاريخ توقيع العقد.
- حزر هذا العقد بتاريخ 2016/03/01م من نسختين اصليتين بيد كل طرف نسخة.

بإلله الموفق

الطرف الأول  
علي سالم الصيفي  
المسؤول المالي في الجانب الأمني

الطرف الثاني  
صفوان أحمد لطف  
مدير شركة ليفانت فيجن للاستيراد



Source: Confidential.



**Table 25.1**

Extract of the balance of cash flow of portfolio of two accounts owned by Levant Vision 01394970013027 and 01394970023027 at YKB (YER and USD respectively)

Date	Debit (YER)	Credit (YER)	Balance (YER)	Debit (USD)	Credit (USD)	Balance (USD)	Portfolio (USD)	Known reference
22/03/16			6,369		18,790	24,471	24,497	
22/03/16			6,369	18,526		5,944	5,970	Swift 111600233
03/04/16			6,369		23,000	28,879	28,905	
06/04/16			6,369	22,900		5,979	6,004	Swift 111600277
21/04/16			6,369		46,148	50,992	51,018	
24/04/16			6,369	33,868		17,124	17,149	Swift 111600320
10/05/16		<b>1,869,000,000</b>	1,869,006,369			16,473	7,492,499	<b>CBY 10001/1015</b>
11/05/16	<b>400,000,000</b>		1,469,006,369			16,473	5,892,499	<b>Cash Mohamed Al Moayed</b>
12/05/16	<b>370,100,000</b>		1,098,906,369			16,473	4,412,099	<b>Cash Abdullah Abbas Jahaf</b>
16/05/16	<b>500,000,000</b>		598,906,369			16,473	2,412,099	<b>Cash Ali Qassem Al Ameer</b>
16/05/16	<b>598,900,000</b>		6,369			16,473	16,499	<b>Cash Ali Qassem Al Ameer</b>
18/05/16		<b>2,976,379,560</b>	2,976,385,929			16,473	11,922,017	<b>CBY 10001/1015</b>
23/05/16	<b>500,000,000</b>		1,966,785,929			16,473	7,883,617	<b>Cash Mohamed Al Moayed</b>
23/05/16			1,946,285,929	10,050		6,423	7,791,567	Cash
23/05/16			1,946,285,929		68,250	74,673	7,859,817	
24/05/16	500,000,000		1,446,285,929			74,673	5,859,817	<b>Cash Mohamed Al Moayed</b>
29/05/16	5,000,000		1,438,378,929			74,673	5,828,189	
31/05/16	<b>200,000,000</b>		1,735,878,929			74,673	7,018,189	<b>Cash Mohamed Al Moayed</b>
05/06/16	<b>490,000,000</b>		1,245,477,929			74,673	5,056,585	<b>Cash Mohamed Al Moayed</b>
12/06/16	<b>500,000,000</b>		743,977,929			74,673	3,050,585	<b>Cash Ali Qassem Al Ameer</b>
12/06/16	<b>500,000,000</b>		243,977,929			74,673	1,050,585	<b>Cash Ali Qassem Al Ameer</b>

Source: Panel based on confidential documents

## Annex 26. Unlawful appropriation by major general Saleh Mesfer Alshaer network

1. The Panel has information from documents and credible sources confirming that Saleh Mesfer Saleh Alshaer (also known as Abu Yasser) is the commander of the logistic support authority of the ex-Government of Yemen armed forces, which now fall under Houthi control and the *judicial custodian*<sup>110</sup> of properties and funds owned by Houthis' opponents. The Panel's information shows that Saleh Mesfer Saleh Alshaer is involved in cases of widespread and unlawful appropriations of properties and funds owned by Houthi opponents who are either under arrest or who have taken refuge outside Yemen, without judicial due process, and in violation of applicable international human rights law (IHRL)<sup>111</sup> and international humanitarian law (IHL).<sup>112</sup>
2. The Panel gathered information that Saleh Mesfer Saleh Alshaer was not a member of the Yemeni Armed Forces before the Houthis took power in Yemen. The information in the media that he was a trader who facilitated the transfer of weapons for the Houthis during the six wars seems to be plausible.<sup>113</sup> The Panel obtained copies of his passports with professions as worker in 2000 and as a trader in 2013, see figure 26.1. The Panel noted in Houthi media that he was presented as assistant minister of defense for logistics, 29 January 2018 with the rank of major general, see figure 26.2. He was then appointed as commander of the logistics support authority on 15 September 2018.<sup>114</sup> The Panel has gathered a number of documents which show that a special criminal court of Sana'a has designated him as the judicial custodian of funds and assets appropriated from Houthi opponents. Saleh Alshaer is number 35 in the Saudi list of 40, with 5 million USD reward for information leading to his capture.<sup>115</sup> The Panel also gathered documents signed by major general Saleh Alshaer with the seal of judicial custodian, see figure 26.3.
3. The Panel received testimonies from staff of banks, and money exchange agencies and private companies who indicated that they have been threatened by Abu Yasser when they failed to comply with some of his unlawful requests such as the performance of suspicious financial transactions or the provision of financial information on customers. As a judicial custodian, he was trying to identify the assets owned by Ali Abdullah Saleh (Yei.003) after his death on 4 December 2017. Some of these staff have been arrested at the national security bureau under the authority of Motlaq Amer al-Marrani (aka 'Abu Emad') for several weeks without any charge and without the possibility to communicate with their family. Some of these arrests have been made public by the media including that of the managing director and staff of al Kuraimi, TIIB and YKB, and led to a protest by Yemeni bankers.<sup>116</sup> The Panel also noted media reports of detention of Ghassan Mohamed Abu Ghanem the director of Cooperative and Agricultural Credit Bank (CAC Bank) branch of Baghdad street, Sana'a from early December 2018 to March 2019.<sup>117</sup> Family members of Ali Abdullah Saleh reportedly own bank accounts in that CAC bank branch.

<sup>110</sup> Translation from Arabic of *al hariss al qada'i* (الحارس القضائي) used by Sana'a based authorities.

<sup>111</sup> Art. 17 the Universal Declaration of Human Rights (UDHR) (1948) and Art. 25 of the Arab Charter on Human Rights (1994)

<sup>112</sup> Additional Protocol II, Article 4(2)(g), Rules 50 and 52 of Customary International Humanitarian Law, see [https://ihl-databases.icrc.org/customary-ihl/eng/docs/v1\\_rul](https://ihl-databases.icrc.org/customary-ihl/eng/docs/v1_rul), Also, under the Statute of the International Criminal Court, "destroying or seizing the property of an adversary unless such destruction or seizure be imperatively demanded by the necessities of the conflict" and "pillaging a town or place, even when taken by assault," constitute a war crime in non-international armed conflicts. Statute of the International Criminal Court (ICC Statute), Articles 8(2)(e)(v) and 8(2)(e)(xii), A/CONF.183/9 of 17 July 1998.

<sup>113</sup> The Panel has copies of his passports including one issued on 7 October 2013 with a profession as a trader. See also <http://www.khlaasa.net/news168458.html>.

<sup>114</sup> [http://www.26sep.net/news\\_details.php?sid=141549](http://www.26sep.net/news_details.php?sid=141549)

<sup>115</sup> <https://gulfnnews.com/world/gulf/saudi/40-leaders-members-of-al-houthi-militant-group-listed-by-saudi-arabia-1.2119394>

<sup>116</sup> <https://almasdaronline.com/articles/164185>. Mr. Ahmed Thabet Nouman Al-Absi, the managing director of International Bank of Yemen (IBY) was the latest to be arrested on 1 August 2019, and detained by the national security bureau in Sana'a alongside two IBY staff: Zouhair Al Aghbary and Najm Eddine, see <https://almasdaronline.com/articles/170191/amp>. The board of directors of IBY while maintaining that the bank continued to keep its integrity, could not provide the reason for the arrest. CBY Sana'a has not replied to two letters from the Panel containing a request for information on intimidation of bankers and money exchangers. The Panel is investigating whether Yussef Zebara, the deputy of CBY Sana'a was complicit with NSB and the judicial custodian.

<sup>117</sup> <https://yemen-now.com/news3289756.html>

4. The Panel has identified a number of entities that have been unlawfully appropriated by major general Saleh Alshaer and are managed by members of his family who have been designated as the authorized signatories of the entities' bank accounts, see table 26.1. The Panel is investigating whether the unlawful appropriation of social foundations and education institutions aims at having access to funds from international donors as well as the possibility to disguise external financial support through funding of social and development programs. The Panel is investigating allegations that a Houthi affiliated organization under the name of Yemen Thabat<sup>118</sup> was receiving funds from outside Yemen which are used as an incentive to attract and support Houthi combatants.

5. Banks have been compelled by Saleh Alshaer to authorize unlawful withdrawal of funds. These illegal withdrawals expose the banks to the risk of non-compliance with asset freeze measures, liability towards their initial account owners, and to complicity in money laundering and human rights violations associated with the unlawful appropriation. The Panel has identified a number of individuals associated with Saleh Alshaer and involved in facilitating the unlawful appropriation of assets and the diversion of funds, see table 26.2.

**Figure 26.1**

Information from two passports of Saleh Mesfer Saleh Alshaer

<p>Picture of passport issued on 09 December 2000 Profession: worker</p>		<p>Picture of passport issued on 7 October 2013 Profession: trader</p>	
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Source: Confidential.

**Figure 26.2**

Major general Saleh Mesfer Alshaer in a meeting as assistant minister of defense for logistics, 29 January 2018



Source: <https://www.nthnews.net/yemen/ورشة-عمل-لضباط-القو-الرئيس-الصمد-يحضر>

<sup>118</sup> <http://www.yementhabat.org/>

**Table 26.1**

Entities appropriated by major Saleh Alshaer (identified by the Panel)

Appropriated	Original owner	Current link to Alshaer identified by the Panel
al Saleh Foundation <sup>119</sup>	Ahmed Ali Abdullah Saleh (YEi.005)	Name changed to al Shaab foundation with new authorized signatories, see figures 26.4.a to c
Orphans Development Foundation (ODF) <sup>120</sup>	Hamdi Zayad (Islah)	Major general Saleh Alshaer is president of the foundation, see figure 26.5
Yemen Armored	Ahmed Saleh Ali Arrahbi <sup>121</sup>	Director: Abdullah Mesfer Saleh Alshaer (brother of major general Alshaer), see figure 26.6.a to c
Sabafon	Al Ahmar, family and others	Director: Abdullah Mesfer Saleh Alshaer( brother of major general Alshaer), see figure 26.7.a and b
University of Technology Twintech <sup>122</sup>	Khaled Rashad Al Alimi	Raed Hassan Mesfer Alshaer (nephew of major general Alshaer), see figure 26.8

**Source:** Panel based on analysis of documents and bank accounts.

**Table 26.2**

Individuals associated with major general Saleh Musfer Saleh Alshaer aka Abu Yasser (identified by the Panel)

Name	Involvement
Abdullah Musfer Alshaer (Abu Abdelmajeed)	Director Yemen Armored; Sabafon
Raed Hassan Musfer Alshaer	Director of University of Technology Twintech Beneficiary of accounts of Yemen Armored
Ussama Abdulmalik Abu Taleb	Delegate of the judicial custodian
Motlaq Amer al-Marrani (Abu Emad)	
Ahmed Mohamed Alkabsi	President Accounts Al Saleh Foundation
Akram Yahya Baker	Director Al Saleh Foundation
Abdu Ismael Hassan Rajeh	President of the special criminal court, Sana'a
Ahmed Addawrani	Director Orphan Development Foundation
Ahmed Abdullah Yahya Shamseddine	Beneficiary of accounts of Yemen Armored
Wael Abdelmoghni al Aghbari	Finance director Twintech

**Source:** Panel based on analysis of documents and bank accounts

<sup>119</sup> Renamed as al Shaab foundation on 24 July 2018 by the ministry of social affairs and labour under Houthi control after its appropriation without approval of its legal board of directors, see figures 26.4 and 26.5.

<sup>120</sup> <http://www.yateemdev.org/> also known as al Yateem with known subsidiaries Modern Technology College (<http://mtc-ye.net/>) and Rawafed Institute for Training and Development (<https://www.facebook.com/rawafed2013/>), the latter reported projects funded by Care International and Human Appeal Australia see respectively:

<http://www.yateemdev.org/?news=معهد-روافد-للتدريب-والتنمية-يختتم-عدد>

<http://www.yateemdev.org/?news=بتمويل-من-هيئة-الأعمال-الخيرية-استرال>

<sup>121</sup> He sent an email on 14 July 2019 to UN personnel informing that he has been tortured and that his company had been appropriated by the Houthis.

<sup>122</sup> <https://www.iutt.edu.ye/index.php/m/20>.

Figure 26.3

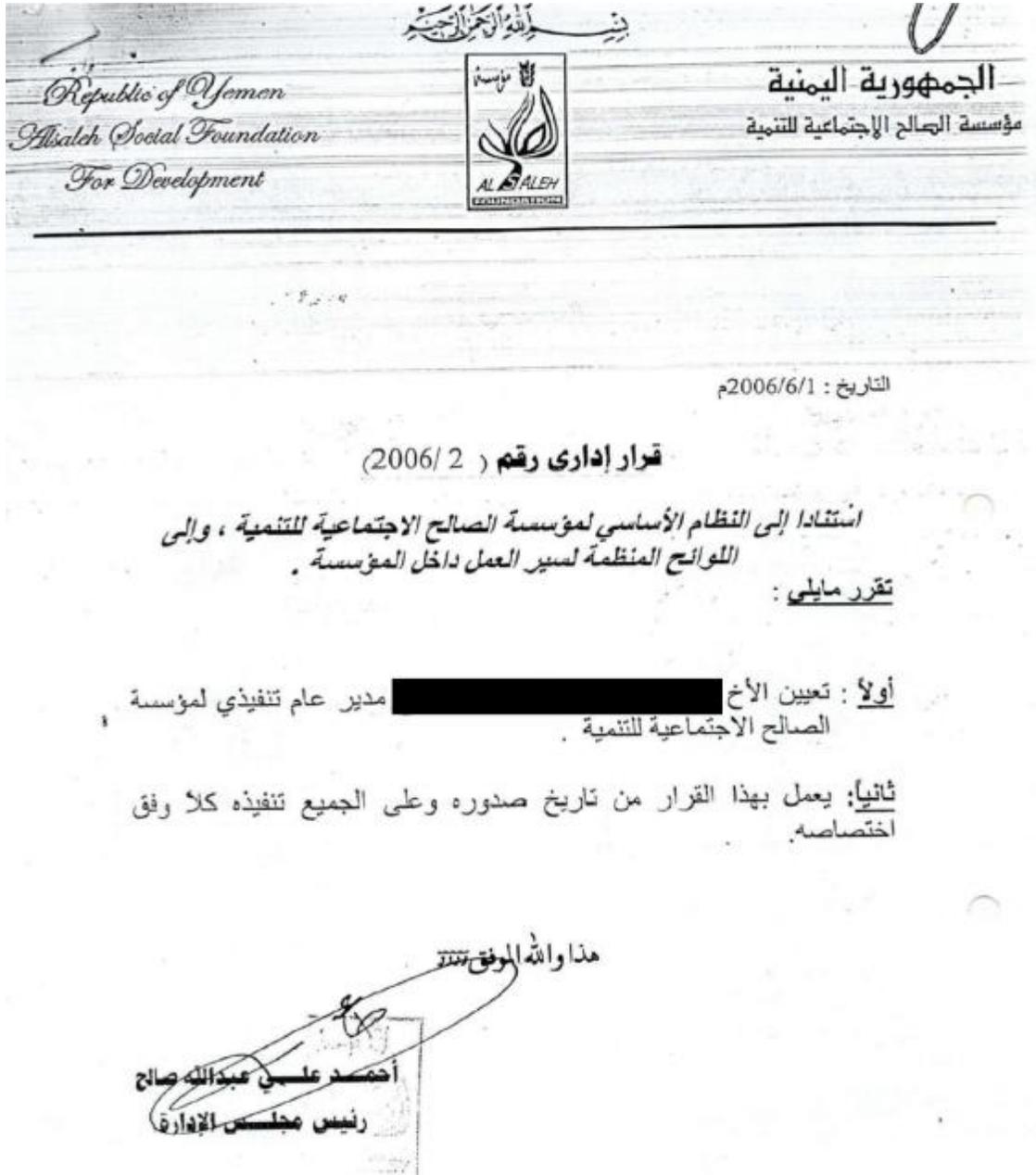
Letter signed by major general Saleh Mesfer Alshaer designating himself as the guardian to levy funds from Houthi opponents to open accounts 0028-711724-022 and 0028-711724-048 at the International Bank of Yemen, in Yemeni Rial and US dollars respectively. The Panel has evidence that these accounts were used to receive deposits not related to any business but most likely as a result of extortion.



Source: Confidential.

Figure 26.4.a

Letter from Ahmed Ali Abdullah Saleh (YEI. 005), as chairman of al Saleh Foundation designating the account signatory, 1 January 2006



Source: Confidential.

Figure 26.4.b

Letter from the ministry of social affairs and labor to the International Bank of Yemen (IBY) informing them that Ahmed Mohamed Alkabsi and Akram Yahya Baker are designated to have the power to withdraw funds from all accounts owned by the Al Saleh Foundation, 9 January 2018

REPUBLIC OF YEMEN  
Ministry of Social Affairs & Labour  
The Deputy Office  
وزارة الشؤون الاجتماعية والعمل  
المركزية العامة لخدمة الجمهور والمكاتب والمناطق  
الرقم : التاريخ :  
المحترم

الجمهورية اليمنية  
وزارة الشؤون الاجتماعية والعمل  
مكتب الوكيل  
الرقم : التاريخ :  
الاخ/ مدير عام بنك اليمن الدولي  
تحية طيبة وبعد...

الموضوع / بشأن المخولين بعملية السحب من رصيد  
مؤسسة الصالح الاجتماعية للتنمية  
تهديكم وزارة الشؤون الاجتماعية والعمل أطيب التحايا..  
بالإشارة إلى الموضوع أصلاً... نود الإحاطة إلى أنه سبق فتح حساب  
لديكم باسم المؤسسة المبينة أعلاه.  
وعليه يرجى اعتماد المخولين بعملية السحب للأخوة التالية أسمائهم:

1. أحمد محمد الكبسي رئيس المؤسسة  
2. أكرم يحيى يساكر المدير العام

وعلى أن تكون عملية السحب معتمدة بختم المؤسسة الرسمي.  
شاكرين تعاونكم معنا سلفاً  
وتقبلوا خالص التحية والتقدير ...

علي صالح عبد الله  
وكيل الوزارة للشؤون الاجتماعية

نسخة مع التحية لوحدة جمع المعلومات بالبنك المركزي

العنوان : صنعاء الصافية - تلفون : ٢٦٢٨٠٠٩ - ٢٦٢٨٠٠٧ - ٢٦٢٨٠٠٩ - ص. ب : (٦٠) ميدان التحرير - تلفون : ٢٧٤٩١٢ - فاكس : ( )  
Address: Sana'a - Al-Safiah - Tel.: 262804 - 262807 - 262809 - P.O.Box : (60) Al-Tahreer - Tel.: 274912 - Fax : ( )

Source: Confidential.

Figure 26.4.c

Letter by major general **Saleh Mesfer Saleh Alshaer** to Yemen Kuwait Bank (YKB) accusing its director of support to the enemy in starving the people by failing to comply with court orders and asking to transfer the interest from deposits of the al Saleh Foundation, 3 June 2018

The letter is asking for payment of expenses for Ramadan evaluated at YER 63 874 000 and YER 22 105 000 as pending payable by the foundation



Source: Confidential.

Figure 26.5

Major general Saleh Alshaer president of ODF attends the graduation ceremony of MTC, 16 July 2019

برعاية -كريمة- من- رئيس- المؤسسة- اللواء- صا= | yateemdev.org/?news=

برعاية كريمة من رئيس المؤسسة اللواء صالح الشاعر وبحضور المستشار الإقتصادي لرئاسة الجمهورية الدكتور عبد العزيز الترب و الأمين العام الأستاذ أحمد الزوراني: الإحتفال بتخرج دفعة أمل المستقبل من طلاب كلية التكنولوجيا الحديثة من جميع التخصصات التطبيقية

16 يوليو، 2019 | لا توجد تعليقات

برعاية كريمة من اللواء صالح بن مسفر الشاعر رئيس المؤسسة

وبحضور المستشار الإقتصادي لرئاسة الجمهورية الدكتور عبد العزيز الترب وحضور الأمين العام الأستاذ أحمد الزوراني: الإحتفال بتخرج دفعة أمل المستقبل من طلاب كلية التكنولوجيا الحديثة من جميع التخصصات التطبيقية

احتفلت اليوم مؤسسة اليتيم التنموية بتخرج دفعة أمل المستقبل من كلية التكنولوجيا الحديثة التابعة للمؤسسة وذلك بتكريم طلاب الدفعة البالغ عددهم 64 طالب وطالبة من الأيتام واليتيمات في أكثر من سبعة تخصصات تطبيقية



Source: <http://www.yateemdev.org/?news=برعاية-كريمة-من-رئيس-المؤسسة-اللواء-صا> 16 July 2019.

Figure 26.6.a

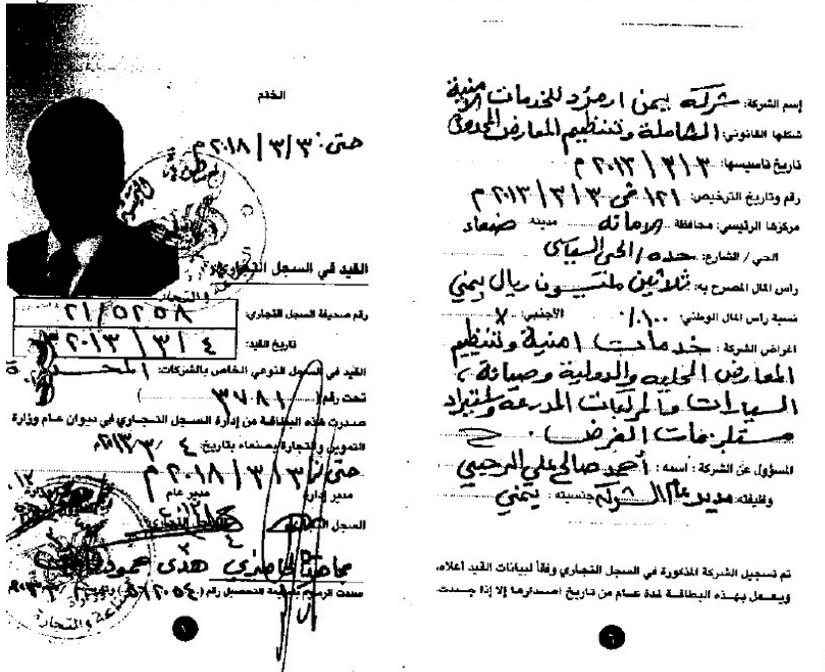
New registration certificate of Yemen Armored with Abdullah Mesfer Saleh Alshaer (brother of Saleh Mesfer Saleh Alshaer) as a manging director instead of the original registration certificate below, 2 July 2019



Source: Confidential

Figure 26.6.b

Registration certificate of Yemen Armored with Ahmed Saleh Ali Arrahbi as a manging director, 3 March 2013



Source: Confidential

**Figure 26.6.c**

Order by the special criminal court, Sana'a to Yemen Armored, 4 July 2019

Translation:

**Reference to:**

Court orders dated 18 March, 24 July and 1 August 2018, which ordered the seizure of real estate and movable funds owned by traitors accused of crimes against the security of the state and collaboration with the enemy and spying for a foreign country; the appointment of major general Saleh Mesfer Alshaer as a judicial guardian, custodian and manager of these funds; and the letter from the judicial guardian dated 9 July 2019 referring to the price of renting armored cars for 2018 and up to June 2019

Orders:

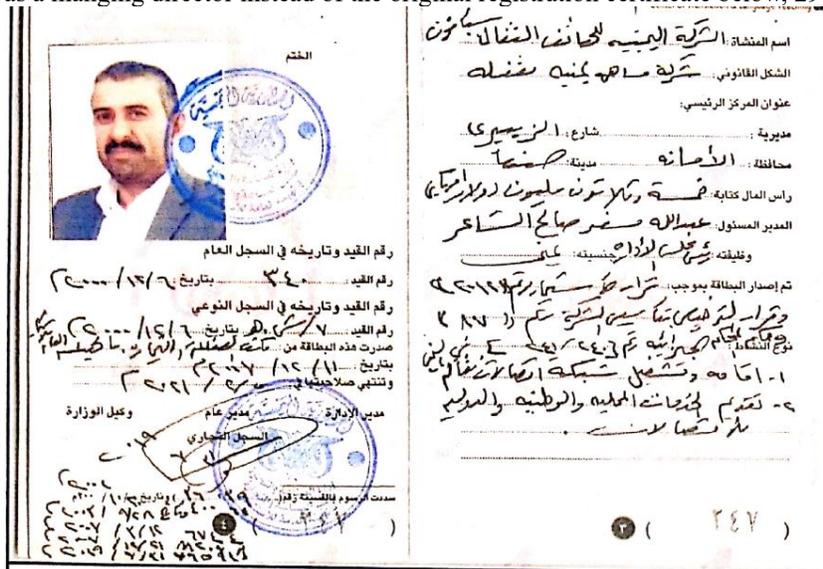
Yemen Armored to issue and cash cheques with the amount of 932 000 USD and 2 100 000 USD to the order of Raed Hassan Mesfer al Saher



Source: Yemen Armored.

Figure 26.7.a

New registration certificate of Sabafon with Abdullah Mesfer Saleh Alshaer (brother of Saleh Mesfer Saleh Alshaer) as a managing director instead of the original registration certificate below, 29 July 2019



Source: Confidential.

Figure 26.7.b

Registration certificate of Sabafon with Hamdan Abdullah Hussein al Ahmar (brother of Hamed al Ahmer) as a managing director, 13 June 2017



Source: Confidential.

**Figure 26.8**

Letter from major general Saleh Mesfer Saleh Alshaer to Sultan Al Sami'i<sup>123</sup> related to the seizure of International University of Technology Wintech, 23 April 2019



Source: <http://www.yppagency.net/164365>, Yemen press agency affiliated with the Houthis.

<sup>123</sup> Sultan al Sami'i, a socialist and member of the Houthi supreme political council, in a previous letter attempted to protect Wintech which was owned by a relative of Rashad Al Alimi, a former Minister of Interior appointed by president Hadi as his adviser. Sultan al Sami'i publicly attacked the Houthis for their ways in dealing with public finance, see <https://www.youtube.com/watch?v=2jdScKsVNwk>.



**Figure 26.10**

Email from the original owner of Yemen Armored to the UN informing that he has been tortured and that his company has been appropriated by the Houthis, 14 July 2019

**From:** [REDACTED]@yemenarmored.com>  
**Date:** July 14, 2019 at 19:35:54 GMT+2  
**To:** [REDACTED]@un.org, [REDACTED]@undss.org, [REDACTED]@undp.org, [REDACTED]@undss.org, [REDACTED]@un.org>, [REDACTED]@un.org, [REDACTED]@yemenarmored.com  
**Subject:** Urgent Notice

Dear All,

Hope this email finds you all well

I would like to inform you that since the establishment of the company, we have been providing the best services to our clients away from any involvement within any political machinations  
We continuously work hard to provide distinguished services not only for financial profits but to build a long-term partnership with our clients of humanitarian organizations that work in Yemen.  
We valued all humanitarian efforts provided to Yemeni people during critical times that Yemen have been through.

Also for your knowledge, Yemen Armored have got a lot of demands by Huthis militias since 2015, they were insisting on the involving of some of their Armed personals to be participating with YAS teams who guards and protect DTF and Hadda compound as well, but despite all the temptations and intimidations which most of security companies capitulated to, we completely rejected it.

But ,after the incidents of 2nd of December 2017, Huthis militias found it as an opportunity to execute their plans and tried to engage YAS and its staff in which was happening and impose the theory that we are in Yemen Armored are following and supporting a certain side or party which was denied by all staff and armed personal in particular who endure to their places and duties despite of the difficulties and challenging situation and even with lack of food and other supplies .

They actually represented Yemen Armored Values and principles very well and this because they are simply members of Yemen Armored not a party Nor a group

Within all the violation acts of Huthis against me which I am sure you heard about what they have done to me. I have been imprisoned, severely tortured .which left traces on multiple parts of my body and effected my health

I was released many times but when I refused any of their interventions in .any of Yemen Armored business they send me back to prison again

Recently, my health collapsed and they prevented me from traveling for a .medical treatment , but I managed and I am now out of their reach

**Source:** Email forwarded by Yemen Armored manager after having left Sana'a.

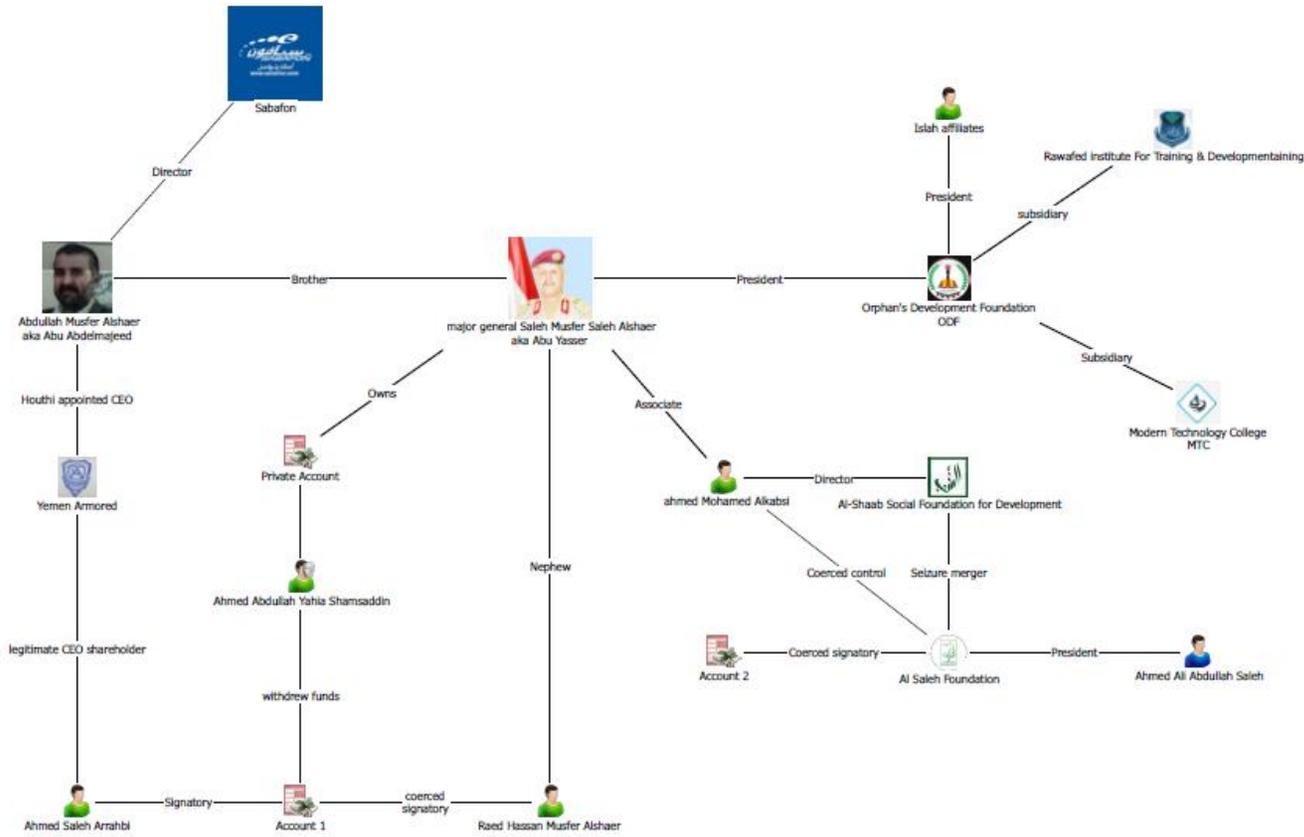
**Figure 26.10 continued**

.Finally, I regret the fact that Huthis Militia have seized the company  
They confiscated YAS properties and began with armored vehicles, which later leased to security  
companies that are cooperating and facilitating information leaking of the movements of United Nations  
personnel  
More over, armed militias have issued illegal orders to acquire YAS bank .accounts which contains  
approximately 4 Millions Dollars  
As a result of that and In order to ensure that the company does not participate in financing any of these  
religious militias actions against the Yemeni people who have been deprived of the basic rights to live in  
dignity and freedom under the Militias control  
For that, we would like you to stop transferring any amounts to the company account at Yemen  
International Bank NO (0002-313106-002) till we provide you with new bank account.  
It is also important to inform you that we are not responsible for any actions or violations that may be  
directed against you or any other side by .the militias and their collaborators under the name of Yemen  
Armored  
As it is difficult to predict what may be done by such religious groups that raise a death slogan and do  
not accept coexistence with anyone who dose not have the same believes, opinion, race or faith  
Kindly note that we are going to establish new branches in other provinces till the time Sanaa regain its  
freedom and return as we have known it a city of coexistence and peace.  
I understand how frustrated you must be, but your cooperation and“ understanding is highly  
appreciated

Ahmed Saleh

General manager

**Figure 26.11**  
Network associated with Alshaer



Source: Panel based on official documents.

**Annex 27. Cases of airstrikes between December 2018 and December 2019****Table 1**

Cases of airstrikes between December 2018 and December 2019

<i>Case</i>	<i>Date</i>	<i>Location</i>	<i>Impact point</i>	<i>Victims</i>	<i>Appendix</i>
1	16 Dec. 2018	14°28'12.1"N 45°20'08.8"E	Truck, Al Sawadyah, Al Bayda	2 children killed	1
2	23 March	N 17° 2'4.32" E 44° 6'30.24"	Gas station and hospital, Kitaf, Sada'a	7 killed, including 4 children and 6 injured	2
3	4 April	14°28'03.3"N 45°20'37.5"E	Car, Al Sawadyah, Al Bayda	4 killed	1
4	16 May	N 15°21'31.14" E 44°11'4.00"	Houses, Raqqas, Sana'a	Approximately 5 children killed, and approximately 78 injured, including 30 children	3
5	24 May	N 13°38'25.2" E 44°22'32.8"	Gas Station, Mawiyah, Ta'izz	7 killed, including 5 children, 2 injured	4
6	28 June	N 13°24'55.29" E 44°15'03.08"	House, Warzan, Khadir, Ta'izz	7 killed, including 4 children and 4 wounded, including 2 children	5
7	31 August	N 14°36'52.82" E 44°21'44.51"	Dhamar Community College (used as a prison), Dhamar	Appr. 100 killed and 40 wounded	6
8	24 Sept.	N 13°52'53" E 44°34'31.3"	House, Qataba, Al Dhale	14 killed, including 7 children and 3 injured	7

## Appendix 1: Case Study airstrikes against trucks in Al Sawadyah, Al Bayda on 16 December 2018 and 4 April 2019

### I. Background

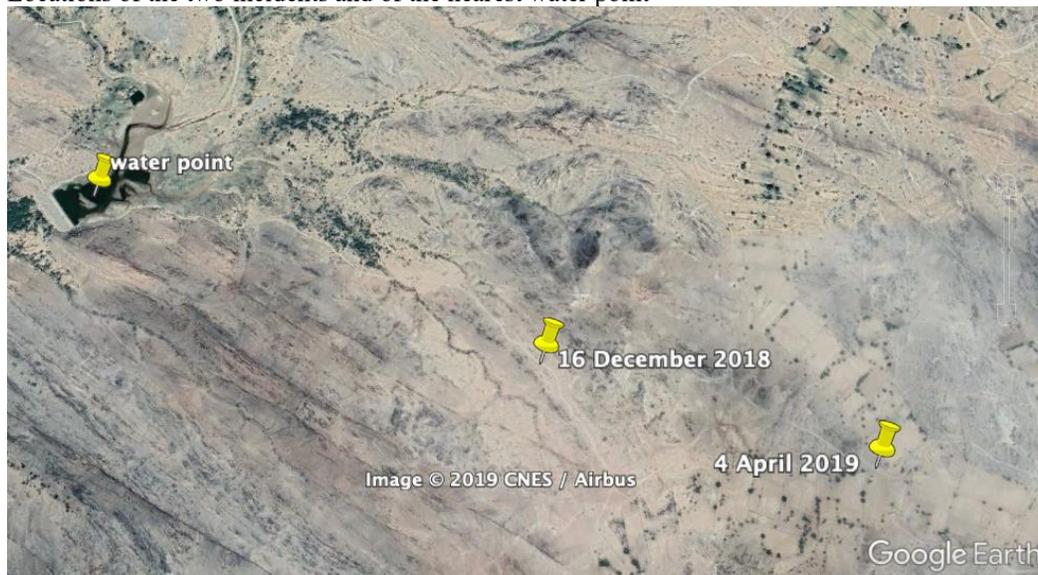
1. On 16 December 2018, at approximately 10:30 LT, in Al Sawadyah, Al Bayda (14°28'12.1"N 45°20'08.8"E), a truck was hit by an explosive ordinance launched from an aircraft killing two children. On 4 April 2019, at approximately 02:00 LT, another truck was hit on the same road, less than 1 km from the location of the first strike, killing 4 people (14°28'03.3"N 45°20'37.5"E).
2. According to testimonies received by the Panel, there is no water in this area and the trucks hit by the two airstrikes were tankers transporting water for civilians from the nearest water point (see figure 1).

### II. Analysis of IHL violations

3. The Panel has not received evidence that civilians, who had lost their protection under IHL, were present at the locations and time of the incident.<sup>124</sup>
4. The Panel notes that there are no visible buildings in the vicinity of the impact points of the two incidents.
5. Based on the information received by the Panel, the Panel concludes that prima facie the attack does not respect the principle of distinction that prohibits attacks against civilians and requires the parties to the conflict to, at all times distinguish between civilians and fighters.<sup>125</sup>
6. In addition, considering that in the incident of 13 December 2018, the two victims were children, the Panel finds it unlikely that the principles of proportionality and precautions were respected.<sup>126</sup>
7. The Panel sent a request for information to KSA concerning this incident and is still awaiting a reply.

#### Figure 1

Locations of the two incidents and of the nearest water point



Source: Google Earth

#### Figure 2

Truck hit on 4 April 2019

<sup>124</sup> CIHL rules 1, 3, 5 and 6.

<sup>125</sup> CIHL rule 1.

<sup>126</sup> CIHL rules 14 and 15.



Source: Confidential

## Appendix 2: Case Study airstrike against a gas station, Kitaf, Sada'a, 23 March 2019

### I. Background

1. On 23 March 2019, at approximately 10:30 LT, an explosive ordnance dropped from an aircraft hit a gas station in Kitaf, Sada'a (N 17° 2'4.32", E 44° 6'30.24") which is next to a hospital and a pharmacy.
2. The incident resulted in the death of seven persons, including four children, a hospital guard and a pharmacist, and the injury of six persons, including one child and a nurse. Damages were also caused to a pharmacy, two cars and to the hospital, see figure 1<sup>127</sup>.
3. The Panel also received information that Houthis were present near the gas station at the moment of the attack and that some would have been killed but could not verify the information. The Panel sent a request for information to KSA about this incident and is awaiting a reply.

### Figure 1

Gas station and hospital after the incident and damage inside the hospital



Source: Confidential

### II. Statement by the Joint Incident Assessment Team

4. The Joint Incident Assessment Team (JIAT) recognized that the attack was carried out and found a malfunction in the guided bomb used. This resulted in the bomb falling 100 meters away from the alleged target and in the destruction of a gas station and damage to the hospital.<sup>128</sup>
5. In its press statement, JIAT recognised that “[t]he mission commander hastened the work procedures to ensure that the military advantage is not lost, which resulted in inaccuracies in the assessment of the possibility of entering the non-military environment within the side effects of targeting.”
6. The Panel received confirmation that the incident was due to a “bomb failure” but did not receive any further details.

### III. Analysis of IHL violations

7. Under IHL, hospitals exclusively assigned to medical purposes must be respected and protected in all circumstances. Hospitals only lose their protection if they are being used outside their humanitarian function to

<sup>127</sup> See also videos online: <https://www.msn.com/en-gb/news/other/yemens-war-kitaf-air-raid-kills-seven-including-four-children/vi-BBVhPxV>; <https://www.youtube.com/watch?v=sggZrozzmOE>.

<sup>128</sup> See online: <https://www.spa.gov.sa/viewstory.php?lang=en&newsid=1933922>. The Panel also received information about cases of malfunction of bombs, including this one, from the JIAT.

commit acts harmful to the enemy. Furthermore, protection of hospitals and medical units may cease only after a warning has been given that includes a reasonable time-limit.<sup>129</sup>

8. The Panel understands from the information published by the Saudi Arabia Press Agency that the hospital was not the target of the attack and that a failure in the bomb caused it to hit the gas station near the hospital and the pharmacy.

9. However, the Panel recalls that IHL requires military commanders and those responsible for planning and executing decisions regarding attacks, to take all feasible precautions to avoid, and in any event to minimize, incidental loss of civilian life, injury to civilians and damage to civilian objects.<sup>130</sup>

10. This includes all necessary verification of the material, aircraft and explosive devices to be used. This assessment has to be made on the basis of the information from all sources which are available to them at the relevant time. Commanders must also obtain the best possible intelligence.<sup>131</sup> Information on the presence of civilians, and the proximity of a hospital and a pharmacy were available at the time of the attack. For example, the JIAT spokesperson recognized that the hospital was on the No Strike List of the Coalition Forces<sup>132</sup>.

11. The Panel noted that the JIAT recommended the following: “Accountability of the Task Commander for breaching the rules of engagement of the Coalition Forces, due to the inaccuracy in the assessment of the possibility of entering a non-military environment within the side-effects of the targeting”.<sup>133</sup>

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<sup>129</sup> Art. 3 common to the Geneva Convention, Art. 11 AP II and CIHL rule 28.

<sup>130</sup> See CIHL rules 14 and 15.

<sup>131</sup> See Commentary to CIHL rule 15, on line : [https://ihl-databases.icrc.org/customary-ihl/eng/docs/v1\\_rul\\_rule15](https://ihl-databases.icrc.org/customary-ihl/eng/docs/v1_rul_rule15).

<sup>132</sup> <https://www.spa.gov.sa/viewstory.php?lang=en&newsid=1933922>

<sup>133</sup> *Idem*.

### Appendix 3: Case Study airstrike against houses, Raqqas, Sana'a, 16 May 2019

#### I. Background

1. On 16 May 2019, at approximately 08:00 LT, an explosion destroyed a building of nine apartments in a densely populated area in Sana'a (N 15°21'31.14", E 44°11'4.00") allegedly resulting in the death of five children and the injury of 78 persons, including 30 children and several women, see figure 1.
2. Information received by the Panel confirms that aeroplanes were heard at the time of the incident. Sources reported one strike on the area of Raqqas where the building is located and some more strikes in other areas of Sana'a. The ministry of information was also targeted that morning.<sup>134</sup>

#### Figure 1

Site of the incident after explosion



Source: confidential.

#### II. Declaration by the Coalition

3. The Joint Forces Command of the Coalition stated that it had conducted a number of air operations on 16 May 2019.<sup>135</sup> It was also reported that the Coalition issued a statement saying that it launched an operation aimed at "neutralising the ability of the Houthi militia to carry out acts of aggression" and that civilians had been warned to avoid those targets.<sup>136</sup> It was further reported that the possibility of an accident had been referred to the JIAT.<sup>137</sup>

<sup>134</sup> <https://sabaanews.net/news536379.htm> and <https://www.alalamtv.net/news/4221616/-ادانات-واسعة-في-اليمن-للمجزرة-السعودية-بصنعاء>

<sup>135</sup> See <https://www.spa.gov.sa/viewstory.php?lang=en&newsid=1924680>

<sup>136</sup> See <https://www.aljazeera.com/news/2019/05/saudi-uae-coalition-carries-deadly-air-raids-yemen-sanaa-190516072613862.html>.

<sup>137</sup> <https://ru.reuters.com/article/worldNews/idAFKCN1SM0W8>.

### III. Analysis of IHL violations

4. According to sources, there was no military presence or activities in the area.<sup>138</sup> The Panel has not received evidence that civilians, who had lost their protection under IHL, were present at the location of the incident.<sup>139</sup> Therefore, the Panel considers it likely that the principle of distinction was not respected.
5. In addition, considering the high number of civilian casualties and the extent of the damage to civilian habitation, the Panel finds it prima facie unlikely that the principles of proportionality and precautions were respected.<sup>140</sup>
6. The Panel has sent a letter to KSA about this incident and is still awaiting a reply.

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<sup>138</sup> On this incident, see also: <https://yemen.bellingcat.com/investigations/san2005-sanaa-residential-house-strike>

<sup>139</sup> CIHL rules 1, 3, 5 and 6.

<sup>140</sup> CIHL rules 14 and 15.

**Appendix 4: Case Study airstrike on a petrol station, Maweyah district, Ta'izz, 24 May 2019**

**I. Background**

1. On 24 May 2019 at approximately 12:15 LT, an explosive ordnance dropped from an aircraft hit a petrol station near the village of Hibil, Maweyah district, Ta'izz (N 13°38'25.2" E 44°22'32.8") resulting in the death of seven people, including five children and the injury of two more and the destruction of the petrol station, see figure 1.

**Figure 1**

Picture of the petrol station after the explosion



Source: Confidential

**II. Analysis of IHL violation**

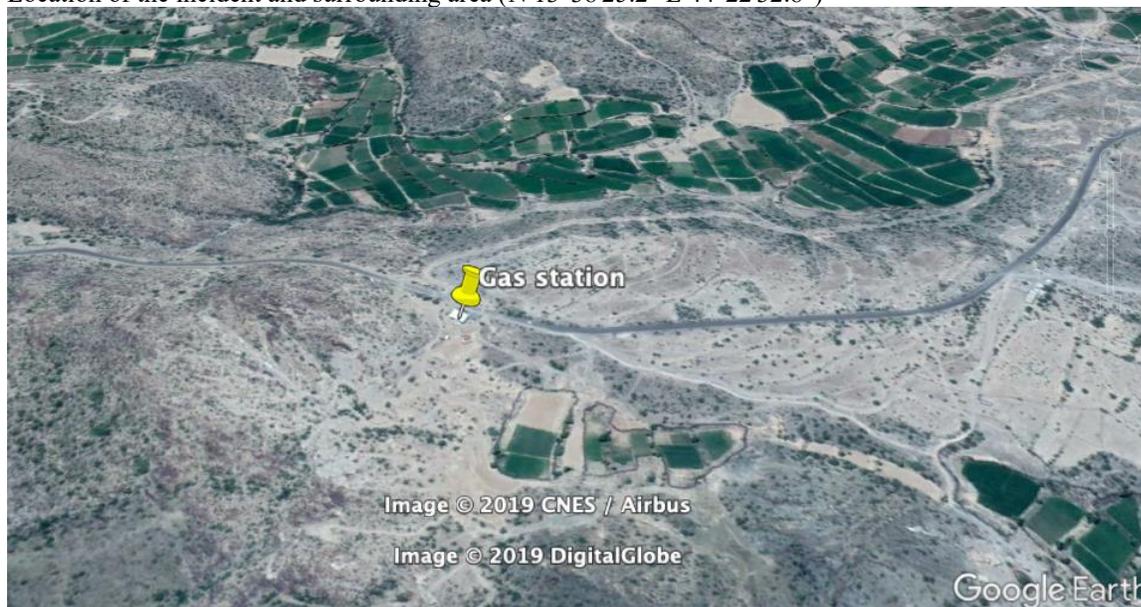
According to the information received by the Panel, there is a military checkpoint controlled by Houthi forces located 60 meters West of the petrol station. The Panel notes that there are no other buildings visible in the vicinity of the petrol station (see figure 2).

However, considering the number of children killed in this incident, the Panel finds it prima facie unlikely that the principles of proportionality and precautions were respected.<sup>141</sup>

The Panel sent a request for information to KSA about this incident and is awaiting a reply.

**Figure 2**

Location of the incident and surrounding area (N 13°38'25.2" E 44°22'32.8")



Source: Google earth

<sup>141</sup> CIHL rules 14 and 15.

## Appendix 5: Case Study airstrike against civilian house, Warzan village, Khadir district, Ta'izz, 28 June 2019

### I. Background

1. On 28 June 2019 between 16:30 and 17:15 LT, an ordinance launched from an aeroplane hit a large house in Warzan village (N 13°24'55.29" E 44°15'03.08"), Ta'izz, resulting in the death of six people, including three children. Approximately 10 to 15 minutes later, a second explosive device hit the location. The house is surrounded by farmland (see figures 1 and 2).
2. According to the information received by the Panel, there were no military activities or fighters in this house. The area is under Houthis control, but according to the information received by the Panel, there was no fighting preceding the time of the attack. The same location was hit by a second airstrike on 2 July 2019 at approximately 12:00 LT. There were no reported victims from the second incident.<sup>142</sup>

### II. Remnants

3. The Panel received photographic evidence of remnants of a munition found on the site of the incident after the airstrike (see figure 3).

### III. IHL analysis

4. The Panel has not received evidence that civilians having lost their protection under IHL (i.e. fighters belonging to the Houthis or to another party to the conflict) were present at the location at the time of the incident.<sup>143</sup>
5. The Panel notes that there are no other buildings in the vicinity of house.
6. Based on the information received by the Panel, the Panel concludes that prima facie the attack does not respect the principle of distinction prohibiting attacks against civilians and requiring the parties to the conflict to at all times distinguish between civilians and combatants.<sup>144</sup>
7. In addition, considering that half of the victims were children, the Panel finds it unlikely that the principles of proportionality and precautions were respected.<sup>145</sup> The Panel sent a request for information to KSA regarding this incident and is still awaiting a reply. The Panel stands ready to revise its conclusions on the basis of additional information provided to it.

### Figure 1

Location of the incident



Source: Google map

<sup>142</sup> Amnesty International also published a report on this incident: <https://www.amnesty.org/en/latest/news/2019/09/yemen-us-made-bomb-used-in-deadly-air-strike-on-civilians/>.

<sup>143</sup> CIHL rules 1, 3, 5 and 6.

<sup>144</sup> CIHL rule 1.

<sup>145</sup> CIHL rules 14 and 15.

**Figure 2**  
House after the incident



**Source:** Confidential



Source: Confidential

**Figure 3**  
Pictures of remnants



Source: Confidential

## Appendix 6: Case Study airstrike against Community College compound, Dhamar city district, Dhamar, 31 August 2019

### I. Background

1. On Saturday 31 August 2019, between approximately 23:45 and 00:20 LT, several explosive ordinances were dropped from aircraft<sup>146</sup> onto buildings of the Dhamar Community College compound, see figures 1 and 3.
2. The compound includes several buildings, at least one of which was used as a prison by Houthi forces.<sup>147</sup> The ICRC confirmed that the site was used as a detention facility and that the organisation had visited the prison which held about 170 detainees.<sup>148</sup> According to testimonies received by the Panel, the majority of detainees were held on the first floor of the main building. The incident resulted in the injury of at least 40 people and the deaths of at least 100 people.<sup>149</sup>
3. This detention site was mentioned in Panel's previous report.<sup>150</sup>
4. Sources mentioned to the Panel that the number of detainees had increased in the weeks before the incident in preparation for a prisoner exchange.<sup>151</sup>
5. Information received by the Panel confirms that there were a number of Houthis present at this location.
6. Former detainees who survived the incident told the Panel that Houthi forces decided to release them after the incident.

### II. Declaration by the Saudi-Arabia led Coalition

7. The spokesperson, Col. Turki Al-Maliki, confirmed the strike in a press release, but claimed the site was of a military nature. He said that: "air defense equipment was present and secondary explosions were observed during the strike, confirming the presence of the explosives used to target civilians with UAVs." He also said that: "This site was not registered with the United Nations, was not on the No Strike List, and is over 10 kilometers from the registered prison in Dhamar,"<sup>152</sup> implying that the Coalition did not know about the presence of detainees in that compound.
8. During a press conference, images of the targeted location were released.<sup>153</sup> On the video, only one strike is visible. It hits the westernmost building in the compound (see figure 2). Col. Al-Maliki said that the case would be investigated by JIAT.

<sup>146</sup> The Panel's sources were not able to confirm the exact number of strikes nor of the number aeroplanes involved. One witness told the Panel said he lost consciousness after the second strike. A report shared with the Panel mentions seven strikes. Witnesses contacted by the Panel mention up to six explosions. Images and video released by the coalition show one strike (see figure 2). Pictures received by the Panel clearly show bomb damage on at least two other buildings (see figure 3).

<sup>147</sup> The Panel has received information that the prisoners were held in one building (indicated in figure 1), however, it has been reported that some other prisoners were held in a second building within the compound, see <https://yemen.bellingcat.com/investigations/dha20001-the-dhamar-detention-center-strike>.

<sup>148</sup> See online: <https://www.icrc.org/en/document/yemen-scenes-devastation-every-single-detainee-either-killed-or-injured-attack>.

<sup>149</sup> The Panel received a list of 160 victims but was unable to verify it, the Head of ICRC delegation in Yemen said that a "... safe presumption is that over 100 had been killed". On September 2, 2019, the Yemen UN Office of the High Commissioner for Human Rights confirmed that 52 detainees were among the dead and that at least 68 detainees were still missing, see <https://news.un.org/en/story/2019/09/1045382>. On September 3, 2019, Mwatana for Human rights reported that the Yemeni Red Crescent Society had recovered 96 dead bodies and 40 injured, see <http://mwatana.org/en/airstrike-on-detention-center/>.

<sup>150</sup> See S/2018/68, para 176. At the time, the Panel mentioned that the number of prisoners in that facility varied between 25 and 100.

<sup>151</sup> This was also reported in the media : <https://www.reuters.com/article/us-yemen-security-dhamar/saudi-led-coalition-bombs-yemen-prison-scores-killed-idUSKCN1VM0ZU>.

<sup>152</sup> See online <https://www.spa.gov.sa/viewstory.php?lang=en&newsid=1964154>.

<sup>153</sup> <https://www.youtube.com/watch?v=btm40ud0y04>.

### III. Analysis of IHL violations

9. The Panel received information that Houthi members, including guards, were present on that site, but could not confirm their number. One witness told the Panel he saw weapons on the site but could not specify which kind of weapons.

10. The Panel sent a request for information to KSA about the military nature of the location targeted in this incident and is awaiting a reply.

11. Detainees, whether civilians or fighters hors de combat, shall be considered as not taking part in hostilities and as such are protected against direct attack under IHL.<sup>154</sup>

12. Even if some Houthi fighters were present on the site, as well as weapons, considering the high number of people killed in the incident, and the fact that several buildings on the site were directly targeted (see figures 2 and 3), the Panel finds it prima facie unlikely that the principles of proportionality and precautions were respected.<sup>155</sup>

13. The responsibility to do everything feasible to verify that the target is of a military nature is binding on each party to the conflict. This obligation, as well as the obligation to take all feasible precautions to avoid, and in any event to minimize, incidental loss of civilian life, injury to civilians and damage to civilian objects<sup>156</sup> requires military commanders and others responsible for planning, deciding upon or executing attacks to assess information from all sources available to them and to obtain the best intelligence possible.<sup>157</sup>

14. The fact that this site was used as a prison was information available in the public domain<sup>158</sup> and was reported by the Panel in its previous report.<sup>159</sup>

15. In addition, according to information received by the Panel, detainees were allowed to communicate with their family once a month and inform them of their location.

16. The Panel also spoke with people who had been held at that location for 18 months and two years, confirming that the location was not a new detention site. Therefore, the presence of detainees at that location was known and this information was available.

#### Figure 1

Location of the incident (the arrow indicates one of the building in which prisoners were)



Source: Google Earth

<sup>154</sup> Article 3 common to the Geneva Conventions, CIHL rule 6.

<sup>155</sup> CIHL rules 14 and 15.

<sup>156</sup> CIHL rule 15.

<sup>157</sup> See commentary to CIHL rule 15.

<sup>158</sup> See *Prisons and detention centers in Yemen during the war*, A report issued by the National Commission to Investigate Alleged Violations of Human Rights, for the period from September 2014 until July 2018.

<sup>159</sup> See 76 of S/2018/594

**Figure 2**

Aerial image of another building targeted by the Coalition



Source: JIAT, online <https://www.youtube.com/watch?v=btm40ud0y04>

**Figure 3**

Point of impact of aerial bomb in two different buildings



Source: Confidential

## Appendix 7: Case Study airstrike against a farmhouse, Qa'ataba district, Al Dhale, 24 September 2019

### I. Background

1. On 24 September 2019 at approximately 08:30 LT an ordnance launched from an aircraft hit a farmhouse in Qa'ataba, Al Dala (N 13°52'53" E 44°34'31.3").
2. Approximately 15 to 20 minutes later, a second airstrike hit a vehicle in the vicinity of the house. The car was carrying wounded people, see figure 2. This second incident resulted in the death of the driver. Both incidents resulted in the deaths of 14 people, including seven children, and four wounded.

### II. Analysis of IHL violation

3. Sources contacted by the Panel said that there was no military activity in the farm, nor was there any presence of fighters or military equipment.
4. The Panel has not received evidence that civilians who had lost their protection under IHL were present at the location and time of the incident.<sup>160</sup>
5. The Panel notes that there is no other building in the vicinity of the farm, see figure 1.
6. The Panel finds it prima facie unlikely that the principle of distinction was respected.<sup>161</sup>
7. In addition, considering the number of casualties, including of children, even if some fighters were present at the time of the attack, the Panel finds unlikely that the principles of proportionality and precautions were respected.<sup>162</sup>
8. The Panel sent a request for information to KSA about in this incident and is awaiting a reply.

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<sup>160</sup> CIHL rules 1, 3, 5 and 6.

<sup>161</sup> CIHL rules 14 and 15.

<sup>162</sup> CIHL rules 14 and 15.

**Figure 1**  
Satellite image of the location of the farmhouse



Source: google map

**Figure 2**  
Pictures of the farmhouse and vehicle after the incident



Source: Confidential

**Annex 28. Violations in the context of detention by the Coalition and associated armed groups**

**CONFIDENTIAL ANNEX NOT FOR PUBLIC DISSEMINATION**

**Annex 29. Violations in respect to detention attributed to the GoY**

**CONFIDENTIAL ANNEX NOT FOR PUBLIC DISSEMINATION**

**Annex 30. Use of explosive ordnance in a civilian area attributed to the GoY, Al Hajar, Ta'izz, 20 August 2019**

**I. Background**

1. On 20 August 2019, at approximately 18:00 LT, an explosive ordnance impacted on a civilian area in Al Hajar, Ta'izz (13°26'00.1"N 43°58'14.6"E) (see figures 1 and 2) resulting in the deaths of two children and the injuries to two more children.
2. The attack occurred during a period of clashes between the GoY forces in Ta'izz and the 35<sup>th</sup> Brigade of the GoY forces, under the control of Abu Al Abbas. The Panel received information that the ordnance was launched from the South. The Panel send a letter about this incident to the GoY and is awaiting a reply.

**Figure 1**

Location of the incident



Source: Google map

**Figure 2**  
Remnant found at the location of the impact



**Source:** Confidential

## II. Analysis of IHL violations

3. The Panel was unable to identify a military objective in the area of the impact and has not received any information which would lead toward the conclusion that civilians who had lost their protection under IHL were present at the time of the attack.
4. The use of explosive ordnance in populated areas raises issues with regard to compliance with the applicable rules of IHL. Mortar bombs and artillery shells have an inherent level of inaccuracy, and the likelihood of indiscriminate effects increases when used at long range at targets in proximity to civilians and civilian objects.<sup>163</sup>
5. Based on the information available, the Panel concludes *prima facie* that this incident constitutes an indiscriminate attack against civilians in violation of the applicable rules of IHL.<sup>164</sup>
6. Even if civilians who had lost their protection under IHL were present at the time of the attack, the Panel concludes that, considering that all victims were children, it is unlikely that the principles of proportionality and precaution were respected.<sup>165</sup>

<sup>163</sup> International Committee of the Red Cross, *Explosive weapons in populated areas. Humanitarian, legal, technical and military aspects*. Expert meeting, 24 and 25 February 2015. (Switzerland, June 2015). Available at [https://shop.icrc.org/explosive-weapons-in-populated-areas-expert-meeting.html?\\_\\_store=default](https://shop.icrc.org/explosive-weapons-in-populated-areas-expert-meeting.html?__store=default), e-book.

<sup>164</sup> Common Article 3 to the Geneva Conventions and Article 13, Additional Protocol II.

<sup>165</sup> See CIHL rules 14 and 15.

**Annex 31. Use of explosive ordnance against civilian populated areas 2019 attributed to Houthi forces**

1. The Panel investigated several incidents showing cases of indiscriminate use of explosive ordnance in populated areas in Yemen and was able to conclude investigations in two of these cases which resulted in the deaths of three civilians, including two children, and injuries to 16 others, including children, see table 1.
2. According to testimonies and evidence received by the Panel, all three incidents are attributable to the Houthis. The Panel sent a letter to Houthi authorities in that respect and is awaiting a reply.
3. Panel's investigation is based on independent investigations and information available in the public domain. The Panel has not identified a military objective in any of the case investigated nor the presence of civilians, who had lost their protection under IHL. However, if the Houthi political or military leadership can provide verifiable information on the military objectives targeted, or intended to be targeted, that may counter the Panel's preliminary findings, the Panel is ready to review them.

**Table 1**

Investigations concluded in 2019

Case	Date	Location	Impact point	Victims/damage
1	5 January	N 13°35'50.4" E 44°00'57.1"	Street, Ta'izz	2 killed, incl. 1 child and 10 injured
2	4 June	N 13° 28' 54" E 44° 0' 9	Agricultural area, al Kadeen village, al Misrakh district, Ta'izz	1 child killed and 6 children injured

## Appendix 1: Ta'izz (5 January 2019)

### I. Background

1. On 5 January 2019 at approximately 18:00 LT, a mortar hit a street in Ta'izz (13°35'50.4" N 44°00'57.1"E).
2. The explosion resulted in the death of two civilians, including a 12 year-old boy and the injury of ten, including three minors,<sup>166</sup> see figure 1.
3. According to the information received by the Panel, the mortar was launched from the North of the 60th street, an area controlled by Houthis.

### Figure 2

Impact of the mortar



Source: confidential.

### II. Analysis of IHL violations

4. The Panel was unable to identify a military objective in the area of the impact and has not received any information which could lead towards the conclusion that civilians who had lost their protection under IHL were present at the time of the attack. The Panel welcomes any information in that respect.
5. The use of unguided explosive ordnance in populated areas raised issues with regard to compliance with the applicable rules of IHL. Mortar bombs and artillery shells have an inherent level of inaccuracy, and the likelihood of indiscriminate effects increases when used at long range at targets in proximity to civilians and civilian objects.<sup>167</sup>

<sup>166</sup> The Panel received information from three different sources, as well as medical records and police report.

<sup>167</sup> International Committee of the Red Cross, *Explosive weapons in populated areas. Humanitarian, legal, technical and military aspects*. Expert meeting, 24 and 25 February 2015. (Switzerland, June 2015).

6. Based on the information available, the Panel concludes that this incident constitutes an indiscriminate attack against civilians in violation of applicable rules of IHL.<sup>168</sup>

7. Even if civilians having lost their protection under IHL were present at the time of the attack, the Panel concludes that considering the important number of victims, including children, it is unlikely that the principles of proportionality or precaution were respected.<sup>169</sup>

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<sup>168</sup> Common Article 3 to the Geneva Conventions and Article 13, Additional Protocol II.

<sup>169</sup> See CIHL rules 14 and 15.

## Appendix 2: Al Kadeen village, Al Misrakh district (4 June 2019)

### I. Background

1. On 4 June 2019 at approximately 06:00 LT, two explosive devices hit a agricultural area in Al Kadeen village, Al Misrakh district (13° 28' 54" N 44° 0' 9" E) see figure 1, at an interval of approximately 5 minutes.
2. The explosion resulted in the death of one child and the injury of six. All victims were between five and 11 years old.<sup>170</sup>
3. According to information received by the Panel, the explosive devices were launched from Al Houban, an area under Houthi control.

**Figure 1**

Location of the impact



Source: Google

**Figure 2**

Pictures of the impacts



<sup>170</sup> Confidential source, and medical records on file with the Panel.



Source: Confidential

**Figure 3**  
Debris from mortar used



Source: Confidential

## II. Analysis of IHL violation

4. According to information received by the Panel, there was no military activities or presence of fighters in the area at the time of the attack and no civilian having lost his/her protection under IHL was present. The Panel finds it very unlikely that the victims, all children, had lost their protection under IHL against direct attack.

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5. The use of unguided explosive ordnance in populated areas raised issues with regard to compliance with the applicable rules of IHL. Mortar bombs and artillery shells have an inherent level of inaccuracy, and the likelihood of indiscriminate effects increases when used at long range at targets in proximity to civilians and civilian objects.<sup>171</sup>
  6. Based on the information available, the Panel concludes that this incident constitutes an indiscriminate attack against civilians in violation of applicable rules of IHL.<sup>172</sup>

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<sup>171</sup> International Committee of the Red Cross, *Explosive weapons in populated areas. Humanitarian, legal, technical and military aspects*. Expert meeting, 24 and 25 February 2015. (Switzerland, June 2015).

<sup>172</sup> Common Article 3 to the Geneva Conventions and Article 13, Additional Protocol II, and CIHL rules 14 and 15.

**Annex 32. Violations in the context of detention attributed to the Houthis forces**

**CONFIDENTIAL ANNEX NOT FOR PUBLIC DISSEMINATION**

### **Annex 33. Recruitment and use of children in armed conflict**

#### **I. Introduction**

1. The Panel received information about the endemic use of children in activities related to the conduct of hostilities in Yemen.<sup>173</sup> However, documentation of specific cases is difficult due to the need to protect the victims and their families, and the fact that many victims, relatives or witnesses are afraid to talk to the Panel and that the Panel is unable to travel to most parts of Yemen.
2. The Panel was able to document three specific cases of children aged between 12 and 15 used by Houthi forces to fight between 2017 and 2018.
3. The Panel continues to investigate to identify individual responsible for the recruitment and use of children in armed conflict in Yemen as they would to fall under the designation criteria contained in paragraphs 17 and 18 of resolution 2140 (2014).

#### **II. Cases**

##### **a. Child 1**

4. At the end of 2017-beginning of 2018, at the age of 15, the child was taken by forces from his school in Amran, with approximately 15 other children, by a group led by someone called “Ahmed Ali” and affiliated to the Houthi forces. He was sent to Sana’a for three-months of training. The training center comprised of several tents. According to him, there was approximately 300 children in the camp. After the training, he was sent to fight on the West Coast on the border between Ta’izz and al Hudaydah. He was with approximately 20 other children at the front line. They were armed with small arms such as Kalashnikov rifles. He stayed one month on the front line. He did not receive a salary while he was fighting and would sell some ammunition when he needed money. He was able to escape during a day-off, which was given by his superior.

##### **b. Child 2**

5. In 2018, at the age of 12, the child was taken by force by the Houthi forces from his home in Sirwah, Ma’rib. Over 100 children from the region were also taken during that period. They brought him to a valley for three months of training. The two first months were mainly about ideology and jihad. During the third month, he received training on the use of small arms. During the first two months, the children were given very little food. During the last month, rice and chicken were added to their meals. After the training, he was sent to support the fighting against the GoY forces in Sirwah, Ma’rib. He was doing logistical work and was bringing food to the front. He was also asked to fight at the front line with approximately 25 other children. He was prohibited from seeing his family and was often beaten by Houthis members. He stayed there for approximately one and a half years. One night, he managed to escape and to cross the front line to join his family. He was not given a salary. His family received threats after he escaped from the Houthis.

##### **c. Child 3**

6. In July 2017, at the age of 13, the child was recruited in Nihm district, Sana’a. Someone called “Abu Ahmed” and seven other Houthi members were looking to recruit children at that time. They told him he would receive a three-day educational training. They took him to a camp in a valley. There were approximately 100 people in the camp, the majority of whom were children. Once there, he was kept by force. He received a three-month training. The first month was about ideology and jihad and the two last months concerned the use of small arms. After this, he was sent to the front line at the border between Sana’a and Ma’rib. He stayed there for four months. He was used for logistical tasks, but when there were attacks, he was sent to fight to the front line with other children. The children were the first to be sent to the front. There were approximately 40 children at that front. He was not allowed to see his family. He managed to escape when a family member negotiated a three-day leave for him. He was not given any salary.

<sup>173</sup> Although the number is probably much higher, between April 2013 and December 2018, the United Nations verified the recruitment and use of 3,034 children by parties to the conflict in Yemen, mostly by Houthi forces. See S/2019/453, para. 17.

### III. Analysis of IHL violations

7. Under IHL, children under 15 years old must not be recruited in the armed forces of the parties to the conflict and must not be allowed to take part in hostilities.<sup>174</sup> The Panel notes that, since 2007, Yemen is party to the Optional Protocol to the Convention on the Rights of the Child on the involvement of children in armed conflict. Under article 4 of the Optional protocol, armed groups that are distinct from the armed forces of a State should not, under any circumstances, recruit or use in hostilities persons under the age of 18 years.

8. The three cases documented by the Panel all concern children below 15 years old and demonstrate clear violations of the rules of IHL and human rights norms prohibiting the recruitment of children and their use in hostilities.

9. The forced recruitment of children in armed forces is a form of slavery<sup>175</sup> and nearly always constitute trafficking in persons.<sup>176</sup>

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<sup>174</sup> Additional Protocol II, Article 4(3)(c), CIHL rules 136 and 137, Convention on the Rights of the Child, article 38 (3).

<sup>175</sup> CIHL rule 94.

<sup>176</sup> UNHCR, Annual report of the Special Representative of the Secretary-General for Children and Armed Conflict, A/HRC/37/47, paras 15-16 and UNODC, *Trafficking in person in the context of armed conflict*, 2018, [https://www.unodc.org/documents/data-and-analysis/glotip/2018/GloTIP2018\\_BOOKLET\\_2\\_Conflict.pdf](https://www.unodc.org/documents/data-and-analysis/glotip/2018/GloTIP2018_BOOKLET_2_Conflict.pdf).

**Annex 34. Cases of obstruction to the distribution of humanitarian assistance**

**CONFIDENTIAL ANNEX NOT FOR PUBLIC DISSEMINATION**

**Annex 35. Full list of abbreviations**

AED	United Arab Emirates dirham
aka	Also known as
al-Kuraimi	Al-Kuraimi Islamic Bank
AQAP	Al-Qaida in the Arabian Peninsula
Aramco	Arabian Oil Company KSA
ATGM	Anti-tank guided missile
B/L	Bill of Lading
BHP	Brake Horse Power
BMP	Beijing MicroPilot Flight Control Systems
CAC	Cooperative and Agricultural Credit Bank of Yemen
CBY	Central Bank of Yemen
CHA	Coalition holding area
CID	Criminal investigation department
CIHL	Customary International Humanitarian Law
DDG	Destroyer Designated Guided (Guided Missile Destroyer)
E	East
Forex	Foreign exchange
GIS	UN Geographical Information System
GoY	Government of Yemen
GPS	Global Positioning System
HEF	Hadramaut Elite Forces
IBY	International Bank of Yemen
ICC	International Criminal Court
IHL	International Humanitarian Law
IHRL	International Human Rights Law
IMD	Iran Military Display
IMO	International Maritime Organization
ISIL	Islamic State of Iraq and Levant
JIAT	Joint Investigation and Assessment Team
Km	Kilometre
KSA	Kingdom of Saudi Arabia
LACM	land attack cruise missile
LC	Letter of credit
Mt	Metric tonne
N	North
NAMCHA	National authority for the management and coordination of humanitarian affairs and disaster recovery
NSB	National security bureau
ODF	Orphans Development Foundation
PBS	První brněnská strojírna
PPB	Presidential Protection Brigades
RPG	Rocket-propelled Grenade
RPM	Revolution per minute
SAM	Surface-to-Air missile
SAR	Saudi Arabia Rial
SBF	Security Belt Forces in Southern Governorates
SEF	Shabwani Elite Forces in Shabwa
SPC	Supreme political council (Houthi)
STC	Southern Transitional Council
TIIB	Tadhamon International Islamic Bank

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UAE	United Arab Emirates
UAV	Unmanned aerial vehicle
UDHR	Universal Declaration of Human Rights
UN	United Nations
UNDP	United Nations Development Programme
UNICEF	United Nations Children's Fund
UNVIM	UN Verification and Inspection Mechanism
USA	United States of America
USD	US Dollar
WBIED	Waterborne improvised explosive device
WFP	World Food Programme
YER	Yemeni Rial
YKB	Yemen Kuwait Bank

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