FOLLOWING THE MONEY WESTWARD: HOW US TREASURY SANCTIONS HAVE MOVED FROM BROTHERHOOD CHAPTERS TO EUROPE'S CHARITY NETWORKS

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ARDENT · KEY FINDINGS

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02 On 23 July 2026 OFAC designated a United Kingdom-based official, described by Treasury as Secretary General of the Muslim Brotherhood General Secretariat, for acting on behalf of the Egyptian Muslim Brotherhood.

03 On 2 October 2026 OFAC designated two France-based fundraisers and two French registered associations that it says moved more than US$2 million to a member of Hamas's military wing between 2020 and 2026.

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Summary of the study by the research team · 3 November 2026

SUMMARY

Between January and October 2026, the United States Department of the Treasury's Office of Foreign Assets Control (OFAC) went beyond designating Muslim Brotherhood chapters in the Middle East and

began designating people and charities in Europe. Two actions show the change. On 23 July 2026 OFAC designated a United Kingdom-based official, described by Treasury as Secretary General of the Muslim Brotherhood General Secretariat, for acting on behalf of the Egyptian Muslim Brotherhood (US Department of the Treasury 2026b). On 2 October 2026 OFAC designated two France-based fundraisers and two French registered associations that it says moved more than US$2 million to a member of Hamas's military wing between 2020 and 2026 (US Department of the Treasury 2026c; OFAC 2026).

This study reconstructs how that shift happened, what the official record does and does not say, and what it means for European governments, banks and the charity regulators who will now face questions from Washington. Every factual claim about a designated person comes from the US government's own published designations. They are allegations made by the United States executive and have not been tested in court.

1. THE LEGAL SCAFFOLDING: CHAPTERS FIRST

The groundwork was laid in late 2025. Executive Order 14362 of 24 November 2025 directed the Secretaries of State and the Treasury, after consulting the Attorney General and the Director of National Intelligence, to report within 30 days on designating "certain chapters or other subdivisions" of the Muslim Brotherhood, naming Lebanon, Jordan and Egypt (Executive Office of the President 2025). Note the wording: the order did not treat the Brotherhood as a single designable entity.

Designations followed on 13 January 2026. The Department of State designated the Lebanese Muslim Brotherhood (al-Jamaa al-Islamiyah) as a Foreign Terrorist Organisation and Specially Designated Global Terrorist, together with its secretary general. OFAC designated the Egyptian and Jordanian branches as SDGTs for material support to Hamas (US Department of the Treasury 2026a; US Department of State 2026a). The Sudanese Muslim Brotherhood followed in March: an SDGT on 9 March, and an FTO with effect from 16 March 2026 (US Department of State 2026b; Federal Register 2026). The State Department's FTO list now shows the Lebanese and Sudanese branches among the year's additions (US Department of State n.d.).

The Egyptian designation in January matters most for what came next. Once the Egyptian Muslim Brotherhood was itself an SDGT, Executive Order 13224 allowed OFAC to designate any person who "acted or purported to act for or on behalf of" it, wherever that person lived. Before January 2026, a London-based Brotherhood official was most readily reached through a Hamas link. After January, Brotherhood office-holding could be enough by itself.

2. CASE ONE: THE LONDON-BASED SECRETARY GENERAL (23 JULY 2026)

Treasury's press release of 23 July 2026 describes Mahmoud al-Abyari (SDN entry: EL-ABIARY, Mahmoud, a.k.a. AL-IBIARY; an Austrian national resident in the United Kingdom) as "a United Kingdom-based senior leader of the Egyptian Muslim Brotherhood" and "the Secretary General of the Muslim Brotherhood General Secretariat". Treasury says he has "a long history of senior leadership roles" and "supported the fundraising for U.S.-designated institutions like Filistin Vakfi and Hayat Yolu", which OFAC had earlier sanctioned for ties to Hamas (US Department of the Treasury 2026b).

The legal basis matters more than the narrative. Treasury designated him for acting for or on behalf of the Egyptian Muslim Brotherhood, not for supporting Hamas (US Department of the Treasury 2026b; OFAC 2026b). An analysis published by the Center for Strategic and International Studies (CSIS) on 28 September 2026 makes the same point: the designation was significant because it rested on Brotherhood links rather than Hamas ties, and because it reached a resident of "one of the United States' closest allies" (Simcox 2026).

The same press release covered other designations in the same package: two charities it says Hamas created (Tujuh Bulir Global in Indonesia, also called Seven Spikes Global, and Madad Palestine Charitable Society in Gaza) and a Türkiye-based exchange house, El-Kahira for General Trading, with its owner and two shareholders (SDN spellings: ALDEN, Khaldun; AL-JEBOURI, Zaid; AL-JEBOURI, Abdulla; Treasury's release spells the first and third "Khuldun" and "Abdullah") (OFAC 2026b). Treasury says the exchange house also provided underground banking to Sweden-based organised crime groups, including the Foxtrot Network (US Department of the Treasury 2026b). The release says the action drew on contributions from the Federal Bureau of Investigation, the Drug Enforcement Administration and US Customs and Border Protection.

Date: OFAC's recent-actions page and Treasury's release are both dated 23 July 2026 (OFAC 2026b; US Department of the Treasury 2026b); the CSIS commentary's 26 July is in error.

Open questions for investigation: - Whether UK authorities have taken any parallel measure. No UK asset freeze or Charity Commission action concerning him has been found in the material reviewed (**unconfirmed**; requires a check of the Office of Financial Sanctions Implementation consolidated list). - What the "Muslim Brotherhood General Secretariat" is, institutionally, and where it operates. Treasury does not say. Secondary reporting (ImArabic n.d.; Asharq Al-Awsat n.d.) describes al-Abyari as secretary-general of the Brotherhood's international organisation since 2023, succeeding Ibrahim Munir, and associates him with the London faction. This is secondary only and is **unconfirmed by a primary source**.

3. CASE TWO: THE FRENCH CHARITIES (2 OCTOBER 2026)

On 2 October 2026 OFAC designated:

- **Saleem Abdallah Saleem al-Zaq**, described as a Gaza-based "battalion deputy" in Hamas's military wing who oversees a network of money services businesses and cryptocurrency wallets;
- **Faouzi Barika**, a French national, and **Amel Oualid**, an Algerian national resident in France;
- **Association Baraka** (established 13 October 2023, according to the SDN entry) and **Ensemble C Mieux** (established 1 July 2024), both listed on the SDN entry as registered French associations (OFAC 2026a; US Department of the Treasury 2026c).

Treasury alleges that the French associations solicited public donations "ostensibly to raise money for humanitarian purposes to aid Gazan civilians" and passed them to al-Zaq for onward transfer to Hamas. It puts the total at more than US$2 million over 2020 to 2026, of which US$1.5 million was raised after 7 October 2023, with "hundreds of thousands of dollars" sent in cryptocurrency. It says al-Zaq advertised both fundraisers' accounts on his social media (US Department of the Treasury 2026c). Treasury links

the action to a "broad, multi-jurisdictional operation" led by the Federal Bureau of Investigation, with the New York Police Department among local partners.

Two features stand out.

The incorporation dates. Association Baraka's listed date of establishment, six days after the 7 October 2023 attack, fits a pattern familiar from earlier Treasury actions: short-lived vehicles set up to capture a surge in humanitarian giving. The study notes the date as a fact from the SDN entry (OFAC 2026a) and draws no further inference about intent.

What the record does not say. Unlike the July package, the 2 October release does not mention the Muslim Brotherhood. It is a Hamas action. Commentators who present it as a "Brotherhood" designation go further than the source. The CSIS analysis argues that in Europe "drawing a clear line between European Muslim Brotherhood entities and those linked to Hamas is too binary an approach" (Simcox 2026). That is an analytical judgement by one author, not a Treasury finding, and this study treats it as such.

4. THE PATTERN: FROM HAMAS-ONLY TO BROTHERHOOD-QUALIFIED

The table below lists the 2026 US actions identified in this research that touch the Brotherhood or Hamas finance in Europe and the wider region.

Date (2026)	Agency	Target	Stated basis	Brotherhood named?
13 Jan	State / OFAC	Lebanese, Egyptian, Jordanian branches	FTO/SDGT; material support to Hamas (Egypt, Jordan)	Yes
21 Jan	OFAC	Zaher Khaled Hassan Birawi (UK-based) and the Popular Conference for Palestinians Abroad, with six Gaza charities	PCPA designated as acting for Hamas; Birawi for material support to the PCPA	No
9–16 Mar	State	Sudanese Muslim Brotherhood	SDGT, then FTO	Yes
12 Mar	OFAC	Ghazi Destek Dernegi, Hayat Yolu, Palestinian White Hands (Türkiye); KNRP (Indonesia)	Support for Hamas	Partly (Hayat Yolu called an MB "financial hub")
23 Jul	OFAC	Mahmoud al-Abyari (UK-based) and others	Acting for the Egyptian Muslim Brotherhood	Yes
2 Oct	OFAC	al-Zaq; French fundraisers and associations	Support for Hamas	No

Sources: US Department of the Treasury 2026a, 2026b, 2026c, 2026d, 2026e; US Department of State 2026a, 2026b; OFAC 2026a, 2026b. On 21 January 2026 OFAC designated six Gaza-based charities, the Popular Conference for Palestinians Abroad (described by Treasury as "a front organization for Hamas") and Zaher Birawi, who sits on the PCPA's General Secretariat. That body is distinct from the "Muslim Brotherhood General Secretariat" discussed in section 2, and the two should not be conflated (US

Department of the Treasury 2026d). On 12 March 2026 OFAC designated three Türkiye-based entities (Ghazi Destek Dernegi, Hayat Yolu and Palestinian White Hands) and the Indonesia-based KNRP for supporting Hamas, describing Hayat Yolu as a "financial hub for the Muslim Brotherhood" (US Department of the Treasury 2026e).

Two things follow. First, the Egyptian SDGT designation means that holding office in the Egyptian Brotherhood is now itself a basis for US sanctions on residents of Europe. The al-Abyari case is the first such use identified in this research of that route against someone living in Europe. Second, Treasury is still using the established Hamas-support route for charity networks, and that route does not require any Brotherhood link to be proved. Both routes produce SDN listings that European banks screen against, whatever their own governments have or have not done.

The White House's Counterterrorism Strategy of the United States (May 2026) calls the Brotherhood "the root of all modern Islamist terrorism" and states an intent to "crush the organization everywhere it operates" (The White House 2026, 11–12). The strategy describes the Egyptian, Jordanian and Lebanese chapters as having been declared FTOs; in fact only the Lebanese branch is an FTO, while the Egyptian and Jordanian branches were designated SDGTs (US Department of the Treasury 2026a).

5. IMPLICATIONS

For European governments. US listings now reach people and associations that are lawful in their home jurisdictions. Ministries will face requests from US counterparts to share intelligence or take parallel action. The CSIS analysis notes that French officials talk openly about the Brotherhood, while the United Kingdom is "far more reticent" (Simcox 2026). The European Parliament's vote of 8 October 2026 was a resolution, not a ban, and does not provide a legal basis for national asset freezes (European Parliament 2026).

For financial institutions. Banks with a US nexus must screen against the SDN list regardless of local law. Treasury's releases expressly warn that foreign financial institutions conducting significant transactions for designated persons risk correspondent-account restrictions (US Department of the Treasury 2026b, 2026c). Charities in Europe that share banking, platforms or trustees with listed entities will face de-risking.

For charity regulators. The use of newly formed associations, crowdfunding and cryptocurrency described in the October release points to a gap in registration-stage scrutiny. Regulators in France and the United Kingdom have not, on the evidence reviewed, announced action on the specific entities (**unconfirmed**).

For Congress. Treasury's actions so far rest on existing executive authorities. H.R. 4397, the Muslim Brotherhood Terrorist Designation Act of 2025, was ordered reported by the House Committee on Foreign Affairs on 3 December 2025 but has not reached the floor (Congress.gov n.d.). Congressional oversight could usefully ask how Treasury decides between Brotherhood-based and Hamas-based designation routes, and what evidential standard applies to European residents.

6. LINES FOR FURTHER INVESTIGATION

1. Identify the "Muslim Brotherhood General Secretariat" from primary sources and map its relationship to the Egyptian organisation's factions.
2. Check the French Journal officiel and the national register of associations (RNA) for Association Baraka and Ensemble C Mieux, including any French asset-freeze orders (gel des avoirs).
3. Check the UK consolidated sanctions list and Charity Commission register for any action concerning UK-based persons designated by the United States in 2026.
4. Verify the State Department FTO list entries and the UK and French follow-up described above.

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