



**THE SENTRY**  
WAR CRIMES SHOULDN'T PAY

DATE: 26 June 2023  
TO: Honorable Representatives at the US, EU, Canada and UK governments  
SUBJECT: **Steps to Address the Situation in Sudan**

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*The letter below was sent by The Sentry to recipients at the US, EU, Canada and UK governments:*

Dear Sir/Madam,

We, the undersigned, write this letter to express our concern at the deteriorating situation in Sudan and to urge the US, EU, Canada, and UK governments to build on the actions taken by the US on June 1 by taking measures needed to create leverage to stop the fighting and hold those responsible for the conflict accountable.

The US, EU, Canada and UK should utilize enhanced financial tools of pressure to target individuals complicit in the war, their business entities, and any financial institutions that facilitate the transfer of funds, to attempt to alter the calculations of those escalating the conflict, increasing the risk of atrocities, and obstructing peace efforts. When accompanied by a diplomatic strategy with clear and achievable benchmarks, such network sanctions hold the potential to increase diplomatic leverage for peace and impose consequences on conduct that advances impunity and war.

With the humanitarian situation worsening and Sudan's route to democratic rule looking bleak, policymakers in the US, EU, Canada and UK should adopt a strategy that centres atrocity prevention and in doing so targets the warped incentive structure that favors war and undermines the prospects for democracy in Sudan. The Sudan Armed Forces (SAF) and the Rapid Support Forces (RSF) have each developed a significant business footprint that runs the gamut from real estate to weapons manufacturing. The extensive business enterprises of both parties extend to other countries in the region, as well as to Russia and the Gulf. The actions of the US were a necessary first step, but not yet sufficient to alter the calculations of either warring faction.

We encourage the following policy priorities to build leverage for peace and create some measure of accountability for war crimes and the subversion of democracy and peace:

**1- Impose targeted network sanctions on the officials behind the war.**

The US imposed sanctions on Al Junaid Multi Activities Co Ltd and Tradive General Trading LLC, which are affiliated with the RSF, and Defense Industries System and Sudan Master Technology, which are linked to the SAF. The EU, Canada and UK governments should impose similar sanctions as soon as possible to prevent their jurisdictions being used to circumvent US sanctions.

Unfortunately, the current sanctions on four affiliated entities alone won't be enough to stop the flow of arms and illicit income of both warring parties. Additional sanctions on the individuals responsible for the violence and their associates, enablers, and facilitators are urgently needed to send a clear message to stop the fighting.

For this reason, the US, EU, Canada and UK should impose escalating targeted sanctions on the leaders of the RSF and SAF and their corresponding networks and work with likeminded governments to do the same. Emphasis should be placed on companies affiliated with Burhan and the Dagalo family, such as those listed below:

- The [Omdurman National](#) Bank, Al-Khaleej Bank, and the satellite companies of each
- Rapid Support Forces' [network](#) of companies
- SAF and RSF [entities](#)

## **2- Expand on the recent US business advisory.**

Given the increased possibility of illicit financial flows in Sudan during a period of limited oversight of military and government expenditure because of the war, we welcome the updated Sudan business advisory issued by the US on May 31, 2023. The advisory calls on companies to “conduct heightened due diligence related to human rights issues and the potential that their activities could contribute to conflict, corruption, or other activities that threaten Sudan’s stability.” Specifically, companies affiliated with the RSF, SAF, and the gold mining sector are identified in the advisory as being high-risk entities. The EU, Canada, and UK governments should issue similar advisories for both businesses and individuals active in Sudan.

In addition, we encourage the US’s Financial Crimes Enforcement Network (FinCEN), the UK’s National Crime Agency (NCA), the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC), and European financial intelligence units to issue advisories to financial institutions on the risks to their respective financial sectors stemming from the conflict in Sudan, including typologies, case studies, and red flag indicators related to illicit financial flows into and out of Sudan.

## **3- Use financial pressures to induce a return to a civilian government.**

Sanctions designations must be accompanied by a robust diplomatic and outreach strategy across the US, EU, Canada and UK that outlines the ultimate policy objective of the action, which is to disincentivize state capture by kleptocratic elites and support a peaceful democratic transition to a civilian government. This can be achieved by increasing the cost for kleptocratic control—now and in the future—and by dismantling the current reign of terror under the military regime. In the short and medium term, the strategy should be accompanied by a robust campaign to counter disinformation about targeted sanctions—which of course differ greatly from the comprehensive sanctions imposed by the US in 1997 and removed a few years ago—and to avoid extreme de-risking by financial institutions.

Thank you for your attention. We are eager for the opportunity to discuss these ideas with you.

Yours Sincerely,

**Act for Sudan**  
**Free Press Unlimited**  
**Global Centre for the Responsibility to Protect**  
**International Bar Association’s Human Rights Institute**  
**Never Again Coalition**  
**No Business With Genocide**  
**Protection Approaches**  
**Raoul Wallenberg Centre for Human Rights**  
**Stop Genocide Now**  
**Sudanese American Public Affairs Association (SAPAA)**  
**Sudan Unlimited**  
**Sudanese Women Rights Action**  
**The Sentry**  
**USESA (US-Educated Sudanese Association)**  
**Waging Peace**