

# United States Senate

WASHINGTON, DC 20510

December 17, 2024

President Joseph R. Biden, Jr.  
The White House  
1600 Pennsylvania Avenue, NW  
Washington, DC 20500

Dear Mr. President,

We urge immediate action by your administration to target foreign external actors and foreign business entities fueling the gruesome atrocities in the Sudanese conflict, including those smuggling gold from Sudan to the United Arab Emirates (UAE) and other countries. We also urge your Administration to expeditiously coordinate with allies and partners to strengthen the international response to the conflict, including through multilateral investigations and sanctions, to ensure all responsible actors are held to account.

For over 19 months, fighting between the Sudanese Armed Forces (SAF) and the Rapid Support Forces (RSF) has caused devastating harm to the Sudanese people.<sup>1</sup> The conflict in Sudan has claimed tens of thousands to potentially over one hundred thousand lives,<sup>2</sup> with preventable diseases and starvation emerging as the leading causes of death from April 2023 to June 2024.<sup>3</sup> The violence has displaced more than 11 million people, leaving approximately 25 million people—half of Sudan’s population—in urgent need of food and critical assistance.<sup>4</sup> It has also fueled uncontrolled outbreaks of cholera, malaria, dengue fever, and other diseases. As U.S. Ambassador to the United Nations Linda Thomas-Greenfield stated in September, millions of Sudanese are “on the verge of generational famine.”<sup>5</sup>

We recognize the ongoing efforts of the United States, particularly the work of Special Envoy for Sudan, Tom Perriello, to end the conflict, ensure humanitarian access, and hold the two warring parties and their supporters accountable. Specifically, we applaud your administration’s actions to designate SAF and RSF members to the Office of Foreign Asset Control’s (OFAC) Specially Designated Nationals List, and to announce a blocked pending investigation action against seven

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<sup>1</sup> United Nations News. (2024, October 29). *Sudan’s ‘living nightmare’ continues as 11 million flee war, mass killings*. Retrieved from <https://news.un.org/en/story/2024/10/1156266>.

<sup>2</sup> Perriello, T. (2024, May 1). *Testimony and question-and-answer session on conflict and humanitarian emergency in Sudan: An urgent call to action* [Hearing]. U.S. Senate Foreign Relations Committee. Retrieved from <https://www.foreign.senate.gov/hearings/conflict-and-humanitarian-emergency-in-sudan-an-urgent-call-to-action>.

<sup>3</sup> London School of Hygiene & Tropical Medicine, Sudan Research Group. (2024). *War-time mortality in Sudan: A capture-recapture analysis*. Retrieved from <https://www.lshtm.ac.uk/research/centres-projects-groups/sudan-research-group>.

<sup>4</sup> United Nations News. (2024, October 29). *Sudan’s ‘living nightmare’ continues as 11 million flee war, mass killings*. Retrieved from <https://news.un.org/en/story/2024/10/1156266>.

<sup>5</sup> United Nations High Commissioner for Refugees (UNHCR). (2024, September 25). *Global community to urge action on escalating Sudan crisis at UN General Assembly*. Retrieved from <https://www.unhcr.org/us/news/press-releases/global-community-urge-action-escalating-sudan-crisis-un-general-assembly>.

UAE companies for potentially violating U.S. sanctions on Sudan.<sup>6</sup> However, the Administration must do more to hold to account not only the warring parties, but also external actors providing support to both sides of the conflict, including the UAE, Russia, Saudi Arabia, and Egypt, as well as foreign business entities helping to finance both sides of the conflict.

For example, we are deeply concerned that Sudan's illicit gold trade enables lucrative revenue streams that perpetuate the documented atrocities and worsens the devastating humanitarian crisis in the country.<sup>7</sup> Sudan, one of Africa's largest gold producers, has a gold industry worth billions of dollars. The RSF controls Sudan's richest gold mines, including in Jebel Amir. Over the past decade, the RSF and its leader, Mohamed Hamdan (Hemedti) Dagalo, have established dominance over Sudan's gold trade, using "front companies and banks based in Sudan and the UAE"<sup>8</sup> to finance weapons, propaganda, and alliances with armed groups. The U.S. Department of the Treasury has identified gold operations as "a vital source of revenue for the Dagalo family and the RSF." This revenue fuels violence, as documented by the United Nations.<sup>9</sup>

The UAE is a major hub for smuggled Sudanese gold entering global markets. Between 2012 and 2022, Emirati companies reportedly received over 2,500 tons of illicit African gold worth approximately \$115 billion.<sup>10</sup> Sudan's gold exports predominantly route to the UAE, but their true scale is obscured by significant smuggling and undervaluation. Despite its removal from the Financial Action Task Force's "gray list" in February 2024,<sup>11</sup> the UAE's gold sector remains vulnerable to money laundering.<sup>12</sup> Reports have further linked Sudanese gold smuggled through the UAE to Russia's Wagner Group, which uses these funds to support operations in Africa and Russia's war in Ukraine, undermining international sanctions and exacerbating Sudan's conflict.<sup>13</sup>

We therefore urge your administration to expand efforts by OFAC to fully leverage existing executive authorities and congressionally authorized enforcement mechanisms to hold accountable individuals and entities destabilizing Sudan. More decisive action is needed to target the business entities and external actors fueling the conflict, particularly under the authority of

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<sup>6</sup> U.S. Department of the Treasury. (2024, June 6). *Recent actions: Seven UAE-based entities added to the SDN List under Blocked Pending Investigation (BPI) status*. Retrieved from <https://ofac.treasury.gov/recent-actions/20240606>.

<sup>7</sup> Prendergast, J., & Lake, A. (2023, August 15). *The UAE's Secret War in Sudan*. *Foreign Affairs*. Retrieved from <https://www.foreignaffairs.com/sudan/uaes-secret-war-sudan>.

<sup>8</sup> Global Witness. (2024). *Exposing RSF's secret financial network*. Retrieved from <https://www.globalwitness.org/en/campaigns/conflict-minerals/exposing-rsfs-secret-financial-network/>.

<sup>9</sup> United Nations Security Council. (2024, January 15). *Final report of the Panel of Experts on the Sudan*. (Document No. S/2024/65). Retrieved from <https://documents.un.org/doc/undoc/gen/n24/005/64/pdf/n2400564.pdf>.

<sup>10</sup> SWISSAID. (2024, May). *On the Trail of African Gold*. Retrieved from <https://www.swissaid.ch/en/articles/on-the-trail-of-african-gold/>.

<sup>11</sup> Financial Action Task Force. (2024, February 23). *Jurisdictions under increased monitoring - 23 February 2024*. Retrieved from <https://www.fatf-gafi.org/en/publications/High-risk-and-other-monitored-jurisdictions/Increased-monitoring-february-2024.html>.

<sup>12</sup> UK Government. (2020). *National risk assessment of money laundering and terrorist financing 2020* (Version 1.2). Retrieved from [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/945411/NRA\\_2020\\_v1.2\\_FOR\\_PUBLICATION.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/945411/NRA_2020_v1.2_FOR_PUBLICATION.pdf).

<sup>13</sup> Walsh, D. (2022, June 5). *Wagner; Russia's mercenaries, mine gold and sow chaos in Sudan*. *The New York Times*. Retrieved from <https://www.nytimes.com/2022/06/05/world/africa/wagner-russia-sudan-gold-putin.html>.

Executive Order 14098 and the Global Magnitsky Act. In particular, the U.S. should identify any additional UAE entities violating U.S. sanctions relating to smuggling of gold and ensure those entities are held to account.

Finally, strengthening international coordination is essential to effectively implement and monitor investigations into the atrocities by both sides of the conflict and by external entities. We should also ensure multilateral and comprehensive sanctions against business entities supporting the conflict, including entities profiting from Sudan's illicit gold smuggling. The United States must enhance diplomatic engagement with external actors enabling the conflict while taking concrete steps to dismantle the illegal financing and smuggling networks that sustain it.

In the final months of your administration, we look forward to working with you to enhance U.S. efforts to end the conflict in Sudan, address the humanitarian crisis, hold accountable those responsible for atrocities, and stop the actors fueling this crisis inside and outside Sudan.

Sincerely,



MARK R. WARNER  
Chairman  
Senate Select Committee on Intelligence



JAMES E. RISCH  
Ranking Member  
Senate Foreign Relations Committee



CHRISTOPHER A. COONS  
United States Senator



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M. MICHAEL ROUNDS  
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