

## USAID

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**From:** Wilkes, Joseph  
**Sent:** Thursday, May 07, 2015 11:58 AM  
**To:** Freeman, Andrea (AFR/SP) [USAID] (afreeman@usaid.gov); Dworken, Jonathan (AFR/SSSP) [USAID] (jdworken@usaid.gov)  
**Cc:** Kaloides, Adam K [USAID]; Weiner, Marc (AFR/SP) [USAID] (mweiner@usaid.gov)  
**Subject:** FW: Licence to Pay ISRA Granted

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Hi Sudan team,

Some good news; it looks as though the World Vision-ISRA OFAC issue in Blue Nile has been resolved. Please let me know if you have any questions or concerns regarding this.

(b)(6) Wilkes  
Disaster Operations Specialist  
U.S. Agency for International Development (USAID)  
Office of U.S. Foreign Disaster Assistance (OFDA)  
Cell: [REDACTED]  
Office: (202) 661-9372  
[jjwilkes@ofda.gov](mailto:jjwilkes@ofda.gov)

**From:** Charles Wanjue [mailto:cwanjue@usaid.gov] (b)(6)  
**Sent:** Thursday, May 07, 2015 5:56 AM  
**To:** Daniel Holmberg; Lea Swanson; Moeling, Benjamin X  
**Cc:** Meserve, Lawrence (SUDAN/MD) [USAID]; [REDACTED] [USAID]; Wilkes, Joseph (DCHA/OFDA) [USAID]  
**Subject:** Fwd: Licence to Pay ISRA Granted

Good news and a great relief, really!

Thank you Ben for your help.

Regards,

---

**Charles Wanjue**  
Senior Program Officer  
Office of U.S. Foreign Disaster Assistance (OFDA)  
U.S. Agency for International Development (USAID)  
US Embassy, Khartoum  
Kilo 10, Soba, Khartoum, Sudan  
**Mobile:** [REDACTED]  
**Office:** +249 187022239  
**Voip:** +1 202 216 6236  
**Email:** [cwanjue@usaid.gov](mailto:cwanjue@usaid.gov)

(b)(6)

----- Forwarded message -----

From: [redacted]  
Date: Thu, May 7, 2015 at 12:21 PM  
Subject: Licence to Pay ISRA Granted  
To: [imeserve@usaid.gov](mailto:imeserve@usaid.gov)  
Cc: [cwanjue@usaid.gov](mailto:cwanjue@usaid.gov)

Greetings Larry and Charles.

Today, we received a licence to pay ISRA the 125,000 dollars that we owe them.

This comes as a great relief as ISRA had become restive and had threatened legal action, which would have damaged our reputation and standing in Sudan and the great work that we believe we are doing with conflict affected communities.

I am grateful to you advocating for us and supporting us through this process and providing Washington the information they needed to make this decision. It is a reflection of the confidence you have in us an agency and your desire to see us continue the work we are doing with the most vulnerable members of Sudanese society.

(b)(6) nteni sana!

(b)(6)

(b)(6)

World Vision Sudan  
Telephone: [redacted]  
Email: [redacted]  
Skype: [redacted]

## USAID

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**From:** Wilkes, Joseph  
**Sent:** Monday, August 31, 2015 1:03 PM  
**To:** Holmberg, Daniel  
**Cc:** Wanjue, Charles [USAID]; Daniel Holmberg  
**Subject:** RE: A question about OFAC

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Gotcha, I read it wrong. Thanks!

JW

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**From:** Holmberg, Daniel  
**Sent:** Monday, August 31, 2015 11:38 AM  
**To:** Wilkes, Joseph  
**Cc:** Wanjue, Charles [USAID]; Daniel Holmberg  
**Subject:** RE: A question about OFAC

It wasn't Larry, it was me.

(b)(6) Daniel Holmberg  
Humanitarian Advisor - Sudan  
Office of U.S. Foreign Disaster Assistance (OFDA)  
Khartoum office Tel: +249-1-870-22000 ext 2933  
Mobile in Sudan: [REDACTED]  
Mobile (International): [REDACTED]  
Email: [dholmberg@ofda.gov](mailto:dholmberg@ofda.gov) / [dholmberg@usaid.gov](mailto:dholmberg@usaid.gov)

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**From:** Wilkes, Joseph  
**Sent:** Monday, August 31, 2015 3:48 PM  
**To:** Holmberg, Daniel  
**Cc:** Wanjue, Charles [USAID]; Daniel Holmberg  
**Subject:** RE: A question about OFAC

It looks like Larry has already done due diligence with this. I would leave it at that.

JW

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**From:** Holmberg, Daniel  
**Sent:** Monday, August 31, 2015 7:51 AM  
**To:** Wilkes, Joseph (DCHA/OFDA) [USAID]  
**Cc:** Wanjue, Charles [USAID]; Daniel Holmberg  
**Subject:** FW: A question about OFAC

Hi Jay,

See below State dept guidance in regard to ISRA request to for guidance to getting off OFAC list.

Should I send them the link?

Please advise.

(b)(6) Daniel Holmberg  
(b)(6) Senior Humanitarian Advisor - Sudan  
(b)(6) Office of U.S. Foreign Disaster Assistance (OFDA)  
Khartoum office Tel: +249-1-870-22000 ext 2933  
Mobile in Sudan: [REDACTED]  
Mobile (International): [REDACTED]  
Email: [dholmberg@ofda.gov](mailto:dholmberg@ofda.gov) / [dholmberg@usaid.gov](mailto:dholmberg@usaid.gov)

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**From:** Streitfeld, Daniel S [<mailto:StreitfeldDS@state.gov>]  
**Sent:** Monday, August 31, 2015 2:02 PM  
**To:** Holmberg, Daniel  
**Cc:** Meserve, Lawrence (SUDAN/MD) [USAID]  
**Subject:** RE: A question about OFAC

Daniel –

Sounds like they are on the Specially Designated Nationals (SDN) list. Basically, they will need to appeal their case directly with OFAC. If they go to this link:

<http://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx>

Towards the middle of the page you will see there is a link for ‘Delisting Process’, which is actually just a link to an email address at OFAC to send appeals to. There’s some more legal information at this following link on what kind of appeals might lead to a de-listing:

<https://www.law.cornell.edu/cfr/text/31/501.807>

Regarding your comment about a lawyer, yes there are law firms and lawyers in Washington that specialize in these things. I don’t know much about the de-listing process, but if OFAC has gone to the trouble of putting a person or organization on the SDN list, it’s likely not going to be an easy process to get off it. So, off the record, I can’t imagine them getting anywhere without legal counsel. (And even then, my understanding is it’s not an easy process at all).

Hope this helps,  
Daniel

-----Original Message-----

From: Holmberg, Daniel [<mailto:dholmberg@ofda.gov>]  
Sent: Monday, August 31, 2015 1:43 PM  
To: Streitfeld, Daniel S  
Cc: Meserve, Lawrence (SUDAN/MD)  
Subject: A question about OFAC

Hi Daniel,

Attached is a scan of the business card of Islamic Relief Agency (ISRA). They used to be the local implementing partner for our USAID/OFDA INGO partner 'World Vision'. It came to light that they are on the OFAC list and the partnership was ended and all settled amicably last year. The Executive Director recently approached me for advice. ISRA believes that they are on the list erroneously. It's not my job to assist these people, but if they are on the list erroneously and can manage to get themselves off, I wish them well.

My assumption is that they need a lawyer in the U.S. and that there are probably common law firms that handle these issues.

Do you or others at Pol/Econ have guidance to offer this gentleman?

Please advise.

(b)(6)

el Holmberg

Senior Humanitarian Advisor - Sudan

USAID / Office of U.S. Foreign Disaster Assistance (OFDA) Khartoum office Tel: +249-1-870-22000 ext 2933 Mobile in Sudan:

Mobile (International):

Email: [dholmberg@ofda.gov](mailto:dholmberg@ofda.gov) / [dholmberg@usaid.gov](mailto:dholmberg@usaid.gov)

-----Original Message-----

From: Khartoum USAID Digital Sender2 [<mailto:Khartoum2@usaid.gov>]

Sent: Monday, August 31, 2015 10:03 AM

To: Holmberg, Daniel

Subject: ISLAMIC RELIEF AGENCY CARD

Please open the attached document. This document was digitally sent to you using an HP Digital Sending device.

SBU

This email is UNCLASSIFIED.

## USAID

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**From:** Wilkes, Joseph  
**Sent:** Friday, November 21, 2014 9:07 AM  
**To:** Konyndyk, Jeremy  
**Cc:** Channell, Kasey (DCHA/OFDA) [USAID]; Chan, Carol (DCHA/OFDA) [USAID]; Konyndyk, Jeremy; Posey, Tyler (GC/DCHA-BFS) [USAID]; Christie, Cara (DCHA/OFDA) [USAID]; 'Daniel Holmberg'; Wanjue, Charles [USAID]; Aronson, Scott L. [USAID]  
**Subject:** RE: Potential Terrorism Ties: WV's Subgrantee Under AID-OFDA-G-14-00023 in Sudan  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed

As World Vision staff are unable to access the areas of Blue Nile state where activities are held, ISRA is responsible for all programs in the locality; this includes Ag/FS (provision of seeds and livestock vaccinations) and WASH (borehole rehabilitation and hygiene promotion) activities. All activities have been suspended until this is resolved.

### Jay Wilkes

Disaster Operations Specialist  
East and Central Africa (ECA)  
USAID/DCHA/OFDA  
(202) 661-9372  
[jwilkes@usaid.gov](mailto:jwilkes@usaid.gov)

**From:** Jeremy Konyndyk [<mailto:jkonyndyk@usaid.gov>]  
**Sent:** Thursday, November 20, 2014 6:08 PM  
**To:** Wilkes, Joseph  
**Cc:** Channell, Kasey (DCHA/OFDA) [USAID]; Chan, Carol (DCHA/OFDA) [USAID]; Konyndyk, Jeremy; Posey, Tyler (GC/DCHA-BFS) [USAID]; Christie, Cara (DCHA/OFDA) [USAID]; Daniel Holmberg; Wanjue, Charles [USAID]; Aronson, Scott L. [USAID]  
**Subject:** Re: Potential Terrorism Ties: WV's Subgrantee Under AID-OFDA-G-14-00023 in Sudan

Thanks Jay. What is the nature of ISRA's activities under the grant?

On Thu, Nov 20, 2014 at 9:37 AM, Wilkes, Joseph <[JWilkes@ofda.gov](mailto:JWilkes@ofda.gov)> wrote:

All,

Please note that our partner World Vision International (WVI) in Sudan is currently investigating a sub-grantee, ISRA, for potentially having a relationship to a specially designated global terrorist (SDGT). Please note that WVI has now ceased all payments to ISRA until this matter is clarified, and has reached out to OFAC regarding their transactions with ISRA. Our office will also be reaching out to OFAC to be part of the discussion regarding this matter. As the AOR for this award, I will continue to track this and provide updates as they come in.

Any comments or additional steps you would like us to make are welcome.

Best regards,

**Jay Wilkes**

Disaster Operations Specialist

East and Central Africa (ECA)

USAID/DCHA/OFDA

(202) 661-9372

[jwilkes@usaid.gov](mailto:jwilkes@usaid.gov)

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**From:** Alyssa Todhunter - US [mailto:[atodhunt@WorldVision.org](mailto:atodhunt@WorldVision.org)]  
**Sent:** Thursday, November 20, 2014 8:43 AM  
**To:** Wilkes, Joseph (DCHA/OFDA) [USAID]  
**Cc:** Aronson, Scott; Drew Clark - US  
**Subject:** WV's Subgrantee Under AID-OFDA-G-14-00023

Greetings,

We have been made aware of concerns that our subgrantee, ISRA is, or is related to, a specially designated global terrorist (SDGT). We are seeking urgent inquiry with OFAC to clarify. If ISRA/Sudan is in fact confirmed as a SDGT, we are seeking clarification to see if WV's OFAC license registration scope covers the transaction with IRA. If it doesn't, we intend to apply for a license. World Vision has now ceased all payments to ISRA until this matter is clarified. There may be programmatic impacts, and we are currently seeking additional information regarding this and will follow-up, as soon as possible.

Please do not hesitate to call me with any questions.

Sincerely,

(b)(6)

**Alyssa Todhunter**

Director, Grant and Contract Services | Contract Services/Legal

Phone 253.815.2280 | Cell [redacted] | Fax 253.815.3444 | [atodhunt@worldvision.org](mailto:atodhunt@worldvision.org)

Mail Stop 657 | PO Box 9716 | Federal Way, WA 98063-9716 USA

World Vision | Building a better world for children | [www.worldvision.org](http://www.worldvision.org) | Skype: alyssa.todhunter

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--

**Jeremy M. Konyndyk**

**Director**

**Office of U.S. Foreign Disaster Assistance**

**US Agency for International Development**



1300 Pennsylvania Avenue NW  
Washington, DC 20523

Assistant: Olga Bilyk  
[obilyk@usaid.gov](mailto:obilyk@usaid.gov)  
202.712.4954



## USAID

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**From:** Wilkes, Joseph  
**Sent:** Wednesday, December 31, 2014 2:13 PM  
**To:** 'Alyssa Todhunter - US'  
**Cc:** Aronson, Scott; 'Drew Clark - US'; Christie, Cara (DCHA/OFDA) [USAID]  
**Subject:** RE: WV's Subgrantee Under AID-OFDA-G-14-00023

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Hi Alyssa,

Greetings from DC, and happy holidays. Does World Vision have any updates on the concerns regarding sub-grantee ISRA?

Thanks,

**Jay Wilkes**  
Disaster Operations Specialist  
East and Central Africa (ECA)  
USAID/DCHA/OFDA  
(202) 661-9372  
[jwilkes@usaid.gov](mailto:jwilkes@usaid.gov)

---

**From:** Alyssa Todhunter - US [<mailto:atodhunt@WorldVision.org>]  
**Sent:** Thursday, November 20, 2014 8:43 AM  
**To:** Wilkes, Joseph (DCHA/OFDA) [USAID]  
**Cc:** Aronson, Scott; Drew Clark - US  
**Subject:** WV's Subgrantee Under AID-OFDA-G-14-00023

Greetings,

We have been made aware of concerns that our subgrantee, ISRA is, or is related to, a specially designated global terrorist (SDGT). We are seeking urgent inquiry with OFAC to clarify. If ISRA/Sudan is in fact confirmed as a SDGT, we are seeking clarification to see if WV's OFAC license registration scope covers the transaction with IRA. If it doesn't, we intend to apply for a license. World Vision has now ceased all payments to ISRA until this matter is clarified. There may be programmatic impacts, and we are currently seeking additional information regarding this and will follow-up, as soon as possible.

Please do not hesitate to call me with any questions.

Sincerely,

(b)(6)

**Alyssa Todhunter**

Director, Grant and Contract Services | Contract Services/Legal

Phone 253.815.2280 | Cel [REDACTED] | Fax 253.815.3444 | [atodhunt@worldvision.org](mailto:atodhunt@worldvision.org)

Mail Stop 657 | PO Box 9716 | Federal Way, WA 98063-9716 USA

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## USAID

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**From:** Carolyn Siganda <csiganda@usaid.gov>  
**Sent:** Monday, January 12, 2015 11:52 AM  
**To:** Wilkes, Joseph (DCHA/OFDA) [USAID]  
**Subject:** Fwd: FW: Sudan Blue Nile Project Closeout Plan/Pipeline; Update on ISRA  
**Attachments:** WV\_Sudan Blue Nile Recover Program 2014\_Pipeline\_2015 1 8.xlsx; OFDA Blue Nile Project Closeout Plan 9th January 2015.doc

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Hi Jay

My take is this is the same issue we just emailed about with Hal- Let me know if you will get back to WV at this point based on Hal email?

Thanks  
Carolyn

----- Forwarded message -----

**From:** Siganda, Caroline <csiganda@ofda.gov>  
**Date:** Mon, Jan 12, 2015 at 11:46 AM  
**Subject:** FW: Sudan Blue Nile Project Closeout Plan/Pipeline; Update on ISRA  
**To:** "Siganda, Carolyn [USAID]" <csiganda@usaid.gov>

---

**From:** Jill Byrd - US [jbyrd@WorldVision.org]  
**Sent:** Friday, January 09, 2015 3:31 PM  
**To:** Siganda, Caroline  
**Cc:** Alyssa Todhunter - US  
**Subject:** FW: Sudan Blue Nile Project Closeout Plan/Pipeline; Update on ISRA

Hello Carolyn:

I am forwarding you the email below as back-up contact for Jay Wilkes and Cara Christie as instructed on the out-of-office messages for each of them.

God's blessings to you in 2015!

Best regards,

Jill

Jill E. Byrd  
Senior Grant and Contract Officer/Grant and Contract Services/Legal Department/Strategic Solutions

World Vision, Inc. (WVUS)

**Phone:** 253.815.2687 | **Fax:** 253.815.3444 | [jbyrd@worldvision.org](mailto:jbyrd@worldvision.org) | **Skype ID:** jill.byrd  
**Street Address:** 34834 Weyerhaeuser Way South | MS 657 | Federal Way, WA 98001 USA  
**Mailing Address:** PO Box 9716 | MS 657 | Federal Way, WA 98063-9716 USA

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**From:** Jill Byrd - US  
**Sent:** Friday, January 09, 2015 12:27 PM  
**To:** '[jwilkes@usaid.gov](mailto:jwilkes@usaid.gov)'  
**Cc:** '[saronson@ofda.gov](mailto:saronson@ofda.gov)'; '[cchristie@usaid.gov](mailto:cchristie@usaid.gov)'; Debebe Dawit - US; Sylvia Mallet-Beke - US; Alyssa Todhunter - US  
**Subject:** Sudan Blue Nile Project Closeout Plan/Pipeline; Update on ISRA

Greetings,

We continue to wait on a response from OFAC. As it has taken more time than we wished, we have also solicited support from the State Department, as well as a Congressman, with the hope that it will speed up OFAC's process/response. Our contact at State has a very limited perspective on OFAC's review and has cautioned us to wait for OFAC's official assessment, but based on what our contact has seen, the tentative indication is that there is no issue with ISRA Khartoum. We continue to await OFAC's formal written assessment.

We will be sure to keep you updated as to any further information we receive, but also feel free to check-in whenever you wish.

In addition, please find attached our closeout plan and pipeline.

If you have any questions, please do not hesitate to contact Alyssa Todhunter at [atodhunt@worldvision.org](mailto:atodhunt@worldvision.org) or Debebe Dawit at [ddawit@worldvision.org](mailto:ddawit@worldvision.org).

Sincerely,  
Jill Byrd (on behalf of Alyssa Todhunter)

Jill E. Byrd  
Senior Grant and Contract Officer/Grant and Contract Services/Legal Department/Strategic Solutions

World Vision, Inc. (WVUS)

**Phone:** 253.815.2687 | **Fax:** 253.815.3444 | [jbyrd@worldvision.org](mailto:jbyrd@worldvision.org) | **Skype ID:** jill.byrd  
**Street Address:** 34834 Weyerhaeuser Way South | MS 657 | Federal Way, WA 98001 USA

## USAID

---

**From:** Kasey Channell <kchannell@usaid.gov>  
**Sent:** Thursday, January 15, 2015 6:11 PM  
**To:** Risley, Lisa (IG/I) [USAID]  
**Cc:** Cohen, Harold (AGC/DCHA-BFS) [USAID]; Clark, Michael A. (M/OAA/DCHA) [USAID]; Wilkes, Joseph (DCHA/OFDA) [USAID]; Chan, Carol (DCHA/OFDA) [USAID]  
**Subject:** Potential OFAC Issue for OFDA award #AID-OFDA-14-00023

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Green Category

Hi Lisa -

(b)(5) - Deliberative Process Privilege

Immediately upon being alerted to this issue on January 12, 2014, OFDA has taken the follow steps to address the situation:

- Ceased approval of vouchers for this award to ensure payments are not made for these activities.
- Met with GC to determine appropriate steps to address the situation.
- Began working with the Agreement Officer to request more detailed accounting of reimbursements made to date to determine what, if any, funds disbursed might be at issue.
- Initiated a review of OFDA's award processing procedures to ensure that Agency policy regarding OFAC issues with sub-awardees was followed and to identify additional due diligence steps or corrective action to be implemented in the future.
- Requested a review of OFDA subawardees across all portfolios to determine if ISRA might have been a sub-awardee under additional mechanisms.

If you have any questions or I can be of assistance in anyway, please let me know.

Thanks for your help.

Kasey

Kasey Channell  
Africa Division Chief  
Office of U.S Foreign Disaster Assistance  
USAID/DCHA/OFDA

202-712-4167  
[kchannell@usaid.gov](mailto:kchannell@usaid.gov)

## USAID

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**From:** Wilkes, Joseph  
**Sent:** Wednesday, January 28, 2015 9:18 AM  
**To:** Channell, Kasey (DCHA/OFDA) [USAID]; Cohen, Harold (AGC/DCHA-BFS) [USAID]  
**Subject:** FW: Developments on the OFAC issue concerning Islamic Relief Agency  
**Attachments:** SU-2014-314462-1.pdf

FYI on this.  
JW

---

**From:** Mark Smith - US [mailto:masmith@worldvision.org]  
**Sent:** Tuesday, January 27, 2015 4:40 PM  
**To:** Clark, Michael A. (M/OAA/DCHA) [USAID]; Wilkes, Joseph  
**Subject:** FW: Developments on the OFAC issue concerning Islamic Relief Agency

Jay and Michael: Further to the email below, I wanted to clarify one thing. We think that the OFAC letter (which is attached to this email) is poorly worded, and upon further reflection, our quote may be taken out of context. To clarify, OFAC first states that IRA Khartoum "appears" to be the entity which is blocked. We believe OFAC should have then stated that "all assets of the entity on the list are blocked" instead of all IRA assets are blocked. We believe OFAC's letter remains ambiguous as to whether IRA Khartoum is or is not a blocked entity.

Having said that, until we gain greater clarity on this issue, as mentioned below, we will not be engaging in further financial transactions with IRA.

I look forward to hearing from you.

Mark

---

**From:** Mark Smith - US  
**Sent:** Monday, January 26, 2015 5:04 PM  
**To:** 'MClark@usaid.gov'; 'Wilkes, Joseph'  
**Cc:** Debebe Dawit - US  
**Subject:** Developments on the OFAC issue concerning Islamic Relief Agency

Jay and Michael: Further to my email dated 1/20/2015 in which I outlined the reasons why World Vision was preparing to restart our programming with the Sudanese Islamic Relief Agency (IRA), we received the following official notification from OFAC late on Friday, the 23<sup>rd</sup> of January:

Based on the information you provided, the subgrantee identified in your request, IRA, appears to be the same entity listed on OFAC's Specially Designated Nationals and Blocked Persons List as a Specially Designated Global Terrorist...all property and interests in property of IRA and all of its offices worldwide are blocked...your request for a license to engage in transactions with IRA is denied.

Obviously, this is a very disappointing development. We are attempting to seek further clarification from OFAC given their use of the word "appears". We are also contemplating having IRA directly advocate for itself to the US Embassy or to OFAC. However, unless OFAC changes its position, we do not plan to engage in any further financial transactions with IRA.

To complete AID-OFDA-G-14-00023 in the Blue Nile State of Sudan, we are actively looking at other program partners. However, this will take some time and we will need a no-cost extension (we have already submitted a request for one) in order to finish this grant.

I would like to set up a face-to-face meeting to discuss the programmatic and financial grant implications. I am scheduled to be at OFDA's offices on Wednesday morning from 11 a.m. – 12:30 p.m. for an unrelated meeting. Would you be available either before or after this appointment?

Finally, as WV weighs of all the options available before us, I wonder whether OFDA would consider submitting a license application to OFAC for transactions with IRA? Perhaps OFDA may have better success in negotiating with OFAC. I'd appreciate hearing your reactions to this.

Thank you, and if you have any questions, don't hesitate to ask.

(b)(6)

Mark C. Smith | Senior Director, Humanitarian and Emergency Affairs | World Vision | 300 I St. NE | Washington D.C., 20002 | Office: +1.202.572.6510 | Mobile: [REDACTED] | Skype: markcsmith1958 | [masmith@worldvision.org](mailto:masmith@worldvision.org) |

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# USAID

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**From:** Holmberg, Daniel  
**Sent:** Wednesday, January 28, 2015 10:27 AM  
**To:** Wilkes, Joseph (DCHA/OFDA) [USAID]  
**Cc:** Channell, Kasey; Platt, Georgianna (OFDA/ECARO) [USAID]; Wanjue, Charles [USAID]  
**Subject:** FW: ISRA ( IRA) Appears to be on terrorist list  
**Attachments:** SU-2014-314462-1.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Just FYI: From CD of World Vision.

I answered "thanks for the update". We have nothing to discuss with them at this level. Personally, if I were them, I would have looked for a new partner. The CD seems to be downplaying the letter from treasury and trying to salvage it, which seems foolish to me. In any case...It's above my pay grade and level.

(b)(6) Daniel Holmberg  
(b)(6) Senior Humanitarian Advisor - Sudan  
Office of U.S. Foreign Disaster Assistance (OFDA)  
Khartoum office Tel: +249-1-870-22000 ext 2933  
(b)(6) Office in Sudan: [redacted]  
(b)(6) Office (International): [redacted]  
Email: [dholmberg@ofda.gov](mailto:dholmberg@ofda.gov) / [dholmberg@usaid.gov](mailto:dholmberg@usaid.gov)

**From:** [redacted] [mailto:[redacted]]  
**Sent:** Wednesday, January 28, 2015 12:17 PM  
**To:** Holmberg, Daniel  
**Cc:** Wanjue, Charles [USAID]; Daniel Holmberg  
**Subject:** ISRA ( IRA) Appears to be on terrorist list

Greetings Daniel.

You will remember that we have been following up this issue with OFAC.

We got a response from OFAC ( attached) indicating that ISRA "appears" to be on the terrorist list. Our legal people are unhappy with the ambiguity in the language as they were seeking a clarification as to whether ISRA is or is not on the list.

The suspension of our partnership with ISRA continues but the issue has generated a lot of interest with HAC and I am having meetings with Ali Adam hopefully next Sunday.

I have also had discussions with the ISRA Country Director and they are of the opinion that this is a case of mistaken identity and they have indicated that they will want to follow up the same with OFAC directly after consulting with their Board of Director.

(b)(6) I will update you as we get additional information  
(b)(6) [redacted]  
Country Program Director  
World Vision Sudan  
Telephone: [redacted]

USAID

(b)(6)

**From:** Charles Wanjue <cwanjue@usaid.gov>  
**Sent:** Sunday, February 22, 2015 9:10 AM  
**To:** [redacted] [USAID]  
**Cc:** Daniel Holmberg; Wilkes, Joseph (DCHA/OFDA) [USAID]; Platt, Georgianna (OFDA/ECARO) [USAID]; LIM AH KEN Lisa; Meserve, Lawrence (SUDAN/MD) [USAID]  
**Subject:** Re: World Vision in the Local Media

**Follow Up Flag:** Follow up  
**Status:** Completed

(b)(6)

Thank you [redacted] for the analysis.

Well noted

Regards,

**Charles Wanjue**  
Senior Program Officer  
Office of U.S. Foreign Disaster Assistance (OFDA)  
U.S. Agency for International Development (USAID)  
Khartoum, Sudan  
**Mobile:** [redacted]  
**Office:** +249 187022239  
**Voip:** 202 216 6236  
**Email:** cwanjue@usaid.gov

(b)(6)

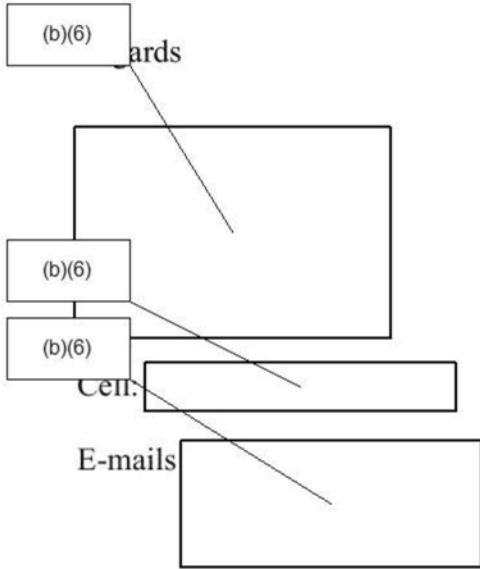
On Sun, Feb 22, 2015 at 1:02 PM, [redacted] wrote:  
Charles;

This came on the first page of the pro-government - daily Intibaha today. The summary of the small article is about a memo from the local community and political leaders to the state level HAC of Blue Nile state requesting the expulsion of WV from the state. The memo made reference to some internal WV communications between WV state level office and the country office.

The article mentioned that the community leaders memo described the WV communications as hostile to Sudan as they cover issues such as the security situation in the state, the movement and operations of SAF; the explosion of the SAF ammunition warehouse in Damazin, progress in the two areas negotiations and preparations for elections.

The memo requested the authorities to investigate these issues with WV in addition to other issues raised earlier against the same organization in Darfur such as: the involvement of WV in evangelism and distribution of the bible in Darfur in addition to organizing a meeting in Deraig IDP with rebel supporters.

My personal take on this; it might be linked with the case of ISRA (Islamic Relief Agency) which is the national partner of WV in the state and has been be suspended due to their being in the OFAC terrorist list. ISRA is well connected with the government and might be playing this to put pressure on WV or punish them, they might have felt that this was influenced by WV or they didn't do enough to protect them.



## USAID

---

**From:** Wilkes, Joseph  
**Sent:** Monday, February 23, 2015 10:00 AM  
**To:** Adams, Haley L [USAID]  
**Cc:** Dworken, Jonathan (AFR/SSSP) [USAID]; 'Rick Montpelier'; Weiner, Marc (AFR/SP) [USAID]; 'Andrea Freeman'; McRae, Tim (DCHA/FFP) [USAID]  
**Subject:** RE: Blue Nile State CSOs demand the expelling of World Vision from the Blue Nile State since it monitors the activities of the Sudanese Army. (Al Sudani)

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Text from OFDA FSN email:

"This came on the first page of the pro-government - daily Intibaha today. The summary of the small article is about a memo from the local community and political leaders to the state level HAC of Blue Nile state requesting the expulsion of WV from the state. The memo made reference to some internal WV communications between WV state level office and the country office.

The article mentioned that the community leaders memo described the WV communications as hostile to Sudan as they cover issues such as the security situation in the state, the movement and operations of SAF; the explosion of the SAF ammunition warehouse in Damazin, progress in the two areas negotiations and preparations for elections.

The memo requested the authorities to investigate these issues with WV in addition to other issues raised earlier against the same organization in Darfur such as: the involvement of WV in evangelism and distribution of the bible in Darfur in addition to organizing a meeting in Deraig IDP with rebel supporters.

My personal take on this; it might be linked with the case of ISRA (Islamic Relief Agency) which is the national partner of WV in the state and has been suspended due to their being in the OFAC terrorist list. ISRA is well connected with the government and might be playing this to put pressure on WV or punish them, they might have felt that this was influenced by WV or they didn't do enough to protect them."

JW

**From:** Haley Adams [mailto:haadams@usaid.gov]  
**Sent:** Monday, February 23, 2015 9:47 AM  
**To:** Wilkes, Joseph  
**Cc:** Dworken, Jonathan (AFR/SSSP) [USAID]; Rick Montpelier; Weiner, Marc (AFR/SP) [USAID]; Andrea Freeman; McRae, Tim (DCHA/FFP) [USAID]  
**Subject:** Re: Blue Nile State CSOs demand the expelling of World Vision from the Blue Nile State since it monitors the activities of the Sudanese Army. (Al Sudani)

Hi Jay, I can't seem to open the file, could you resend in a different format?

Thanks!  
Haley

On Mon, Feb 23, 2015 at 9:40 AM, Wilkes, Joseph <[JWilkes@ofda.gov](mailto:JWilkes@ofda.gov)> wrote:

Please see latest analysis on this from one of our FSNs, attached.

**Jay Wilkes**

Disaster Operations Specialist

East and Central Africa (ECA)

USAID/DCHA/OFDA

(202) 661-9372

[jlwilkes@usaid.gov](mailto:jlwilkes@usaid.gov)

**From:** Jonathan Dworken [mailto:[jdworken@usaid.gov](mailto:jdworken@usaid.gov)]

**Sent:** Sunday, February 22, 2015 9:02 AM

**To:** Wilkes, Joseph (DCHA/OFDA) [USAID]; Adams, Haley L [USAID]; RMT\_SSUDAN

**Cc:** Rick Montpelier; Weiner, Marc (AFR/SP) [USAID]; Andrea Freeman

**Subject:** Fwd: Blue Nile State CSOs demand the expelling of World Vision from the Blue Nile State since it monitors the activities of the Sudanese Army. (Al Sudani)

OFDA and FFP - FYI. Jonathan

(b)(6)

**Jonathan Dworken** Director, Office of Sudan and South Sudan Programs | Bureau for Africa | U.S. Agency for International Development | [jdworken@usaid.gov](mailto:jdworken@usaid.gov) | work  
202.712.4894 | cell

----- Forwarded message -----

**From:** Amir Eltayeb <[aeltayeb@usaid.gov](mailto:aeltayeb@usaid.gov)>

**Date:** Sun, Feb 22, 2015 at 5:39 AM

**Subject:** Blue Nile State CSOs demand the expelling of World Vision from the Blue Nile State since it monitors the activities of the Sudanese Army. (Al Sudani)

**To:** Lawrence Meserve <[lmeserve@usaid.gov](mailto:lmeserve@usaid.gov)>, Zaria Suleiman <[zsuleiman@usaid.gov](mailto:zsuleiman@usaid.gov)>, Lea Swanson <[lswanson@usaid.gov](mailto:lswanson@usaid.gov)>, Charles Wanjue <[cwanjue@usaid.gov](mailto:cwanjue@usaid.gov)>, Ibrahim Hamid <[ihamid@usaid.gov](mailto:ihamid@usaid.gov)>

**Cc:** Richard Montpelier <[rmontpelier@usaid.gov](mailto:rmontpelier@usaid.gov)>, Andrea Freeman <[afreeman@usaid.gov](mailto:afreeman@usaid.gov)>, Jonathan Dworken <[jdworken@usaid.gov](mailto:jdworken@usaid.gov)>, Adam Kaloides <[akaloides@usaid.gov](mailto:akaloides@usaid.gov)>

Dears,

See below from Today newspaper, we will monitor and investigate causes of these allegations and provide more details.

**Blue Nile State CSOs demand the expelling of World Vision from the Blue Nile State since it monitors the activities of the Sudanese Army. (Al Sudani)**

Prominent Native Administration leaders in the Blue Nile State submitted a memorandum to HAC requesting the expelling of World Vision Organization which monitors the activities of the Sudanese Army in the State. At the same time, Blue Nile State government political parties also requested the authorities to take a strict stance towards the organization, following the leakage of messages and reports between World Vision's Director in Damazin and World Vision's Chief of Party. The memo also mentioned World Vision's former violations and the decision to expel it when it was accused of being involved in Christian evangelization activities as well as holding meetings with rebel groups supporters in Diraij Camp. World Vision is also accused of distributing bibles in the Darfur States.

The State's political parties and native leaders considered World Vision's reports as hostile activities against Sudan. According to information reported, the leaked messages listed information concerning the movement of the Sudanese Armed Forces (SAF) South of Bau, Gaisan and Kurmuk areas. World Vision's report also mentioned the farmers activities in the area, harvest levels in addition to reports on the explosion of the ammunition store in the Blue Nile State's military area during the month of January. The report also reviewed the Two Areas negotiation process and preparations for the upcoming elections.

HAC has not yet issued any decisions regarding World Vision.

**Best Regards,**

(b)(6)

**Amir El Tayeb | Development Assistance Specialist/MEO**

**Cell:** [redacted] **VOIP:** +1 202 216 6236 Ext: 2262

**Tel:** (+249) 01-870-22000 Ext: 2262 | **Fax:** (+249) 01-870-22281

--

Haley Adams

(b)(6)

U.S. Agency for International Development (USAID)

Office of Food for Peace

Cell:

[haAdams@usaid.gov](mailto:haAdams@usaid.gov)

## USAID

---

**From:** Wilkes, Joseph  
**Sent:** Monday, February 23, 2015 7:07 PM  
**To:** 'Mark Smith - US'  
**Cc:** 'Debebe Dawit - US'; Channell, Kasey (DCHA/OFDA) [USAID]; Siganda, Carolyne [USAID] (csiganda@usaid.gov)  
**Subject:** RE: Update on Sudan Blue Nile project  
**Attachments:** World Vision OFAC Sudan 19 Feb 2015.pdf; Sudan Article.docx

Hi Mark,

Thank you for the thorough update. If any questions arise, I will contact you immediately.

Best regards,

**Jay Wilkes**  
Disaster Operations Specialist  
East and Central Africa (ECA)  
USAID/DCHA/OFDA  
(202) 661-9372  
[jwilkes@usaid.gov](mailto:jwilkes@usaid.gov)

---

**From:** Mark Smith - US [mailto:masmith@worldvision.org]  
**Sent:** Monday, February 23, 2015 10:39 AM  
**To:** Wilkes, Joseph  
**Cc:** Debebe Dawit - US  
**Subject:** Update on Sudan Blue Nile project

Jay: I want to give you an update on World Vision's Sudan Blue Nile project. As you may know, last week we applied to OFAC for a license to pay to the Sudanese-based Islamic Relief Agency monies owed for work performed pursuant to a couple of grants (one of the grants OFDA funded). I have attached a copy of the request that we sent to OFAC. As you can see, Jeremy Konyndyk was copied on the letter.

Further, attached is a translation of an article that appeared in a pro-government newspaper in Sudan yesterday. World Vision's National Director has shared it with USAID in Khartoum. The ND is also attempting to meet the head of the Humanitarian Aid Commission (HAC), the government's highest institution in charge of NGOs, and of course deny the charges of monitoring military activity and evangelism.

Our Sudan office thinks this is clearly linked to ISRA. Further, they advised us that our Associate Operations Director (a local staff) was actually in Blue Nile yesterday when the article came out. He then went to meet the Blue Nile HAC Director who supposedly was given the memorandum "demanding expulsion of World Vision". The Blue Nile HAC Director was very surprised as he did not receive such a document, nor did he even know about it. The analysis by our office in Sudan is that the newspaper is being sensational by reporting something which is not true.

Our office in Sudan is working on a reply to the article that is polite, but emphatic in denying the allegations published in *Assayha*.

If you have any questions, don't hesitate to ask.

Mark



(b)(6)

Mark C. Smith | Senior Director, Humanitarian and Emergency Affairs | World Vision | 300 I St. NE | Washington D.C., 20002 |  
Office: +1.202.572.6510 | Mobile: [REDACTED] | Skype: markcsmith1958 | [masmith@worldvision.org](mailto:masmith@worldvision.org) |

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## USAID

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**From:** Wanjue, Charles [USAID]  
(b)(6) : Tuesday, March 03, 2015 5:58 AM (b)(6)  
**To:** Platt, Georgianna (OFDA/ECARO) [USAID]; Wilkes, Joseph (DCHA/OFDA) [USAID];  
Siganda, Carolyne [USAID]; Channell, Kasey  
**Cc:** [redacted] [USAID]; [redacted] [USAID]; Nairobi OFDA,  
Information Officer [USAID]; OFDASudan\_IO [USAID]  
**Subject:** Re: Negative Newspaper Report on World Vision  
**Attachments:** Newspaper Article on World Vision.docx

Plus Sureka

Regards,

---

(b)(6) **Charles Wanjue**  
Program Officer  
Office of U.S. Foreign Disaster Assistance (OFDA)  
U.S. Agency for International Development (USAID)  
Khartoum, Sudan  
**Mobile:** [redacted]  
**Office:** +249 187022239  
**Voip:** 202 216 6236  
**Email:** [cwanjue@usaid.gov](mailto:cwanjue@usaid.gov)

On Tue, Mar 3, 2015 at 1:54 PM, Charles Wanjue <[cwanjue@usaid.gov](mailto:cwanjue@usaid.gov)> wrote:

Dear Jay  
et  
al.,

As we reported last week on Feb 25th, USAID/OFDA partner, World Vision was on the first page of the Sudan daily pro-government - local paper (Al Intibaha). The summary of the small article is about a memo from the local community and political leaders to the State-level HAC of Blue Nile state requesting the expulsion of WV from the state. The memo made reference to some internal WV communications between WV state level office and the country office.

The article mentioned that the community leaders memo described the WV communications as hostile to Sudan as they cover issues such as the security situation in the state, the movement and operations of the Sudanese Armed Forces (SAF); the explosion of the SAF ammunition warehouse in Damazin, progress in the two areas negotiations and preparations for elections.

The memo requested the authorities to investigate these issues with WV in addition to other issues raised earlier against the same organization in Darfur such as: the involvement of WV in evangelism and distribution of the bible in Darfur IDP camps in addition to organizing a meeting in Deraig IDP camp with rebel supporters.

We first thought this must be linked with the case of ISRA (Islamic Relief Agency) which is the national partner of WV in the state and has been suspended due to their being in the OFAC terrorist list. ISRA is well connected with the government and might be playing this to put pressure on WV or punish them, they might have felt that the suspension was influenced by WV or they didn't do enough to protect them.

Later in the week WV Country Director (CD) was invited for a meeting with the HAC Commissioner Ahmed Adam, where he presented the WV - CD with a document alleged to be from World Vision with a detailed security and political analysis. Initially WV - CD did not recognize the document, but later learned it was shared with the Sudan team by their Regional Security Analyst in Nairobi on November 12, 2014.

HAC has established a committee to investigate the allegations against World Vision, an initiative that WV welcomed as a good idea. The HAC Committee did not go to WV's office as expected on Sunday (March 1), they called asking that the documents be delivered to their offices instead.

WV - CD met with Ali Adam (Director - Joint Procedure Center of HAC) where he explained to Ali how the report came to be. WV - CD reports that Ali seemed to understand the circumstances that led to this, and asked for back up documentation. He also called the HAC Commissioner to apologize and explain how the document came to be who also advised that WV provides the committee adequate documentation on the same.

WV has written a formal apology letter, which also clearly states that the analysis was done from the region without the Country Director's consent.

WV - CD was requesting us to have The US Ambassador (CdA) place a call to his key contacts in the Ministry of Foreign Affairs and HAC Commissioner, seeking clarification and expressing concern, but we think it is not a good idea as the situation is still fluid with no action from HAC warranting this.

Today, we met the new INGO Steering Committee Chair who informed us that they are working with WVI and OCHA as they negotiate with HAC on this sensitive issue.

We will keep you all posted on this as it unfolds.

Regards,

---

(b)(6) **Charles Wanjue**  
Program Officer  
Office of U.S. Foreign Disaster Assistance (OFDA)  
U.S. Agency for International Development (USAID)  
Khartoum, Sudan  
**Mobile:** [REDACTED]  
**Office:** +249 187022239  
**Voip:** 202 216 6236  
**Email:** [cwanjue@usaid.gov](mailto:cwanjue@usaid.gov)

## USAID

---

**From:** Wilkes, Joseph  
**Sent:** Tuesday, March 24, 2015 11:28 AM  
**To:** Meserve, Lawrence (SUDAN/MD) [USAID]  
**Cc:** Wanjue, Charles [USAID]  
**Subject:** RE: World Vision - IRA issues

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Thank you Larry. We'll follow-up from DC.

JW

**From:** Lawrence Meserve [mailto:lmeserve@usaid.gov]  
**Sent:** Tuesday, March 24, 2015 11:26 AM  
**To:** Wilkes, Joseph  
**Cc:** Wanjue, Charles [USAID]  
**Subject:** Re: World Vision - IRA issues

Jay, Charles - I wouldn't discuss with WVI. The question from USSESSS is - they believe WVI is saying that they need to make their final quarter payment to IRA and if not their project would be in jeopardy of shutting down. I'd suggest you call USSESSS (Lucy Tamlyn) to clarify.

Regards,

Larry Meserve

(b)(6) Mission Director

USAID/Sudan

Office: US VOIP: (202) - 216-6236 ext 2183

Cell: [REDACTED]

[lmeserve@usaid.gov](mailto:lmeserve@usaid.gov)

On Tue, Mar 24, 2015 at 5:05 PM, Wilkes, Joseph <[JWilkes@ofda.gov](mailto:JWilkes@ofda.gov)> wrote:

Hi Larry,

Thanks for the heads up on this. I have yet to hear from USSESSS or WVI regarding this. Further, I have and will continue to elevate all financial decisions regarding this WVI award to the AO for his decision.

If you'd like to discuss further, feel free to give me all call; I'll be at my desk all day.

I've also passed this along to the AO and Kasey Channell, our Africa Division Lead.

**Jay Wilkes**

Disaster Operations Specialist

East and Central Africa (ECA)

USAID/DCHA/OFDA

(202) 661-9372

[jwilkes@usaid.gov](mailto:jwilkes@usaid.gov)

**From:** Lawrence Meserve [mailto:[lmeserve@usaid.gov](mailto:lmeserve@usaid.gov)]  
**Sent:** Tuesday, March 24, 2015 9:49 AM  
**To:** Wanjue, Charles [USAID]; Wilkes, Joseph (DCHA/OFDA) [USAID]  
**Subject:** World Vision - IRA issues

Treat this as SBU

Jay. Charles - I understand WVI is trying to make the case that they need to provide the last tranche of funds to IRA and they say if they don't their whole program will be jeopardized. I was on a SVTC with USSESSS today and suggested they contact Jay as he's been the one dealing with WVI HQ on these issues. I said I'd also check with Charles to get his sense on this issue.

I believe OFAC is in the process of preparing some policy guidance on this, but wanted to try to clarify the critical need for WVI to make such a last tranche payment and if not, they may need to shut down their program. So - please provide me with your thoughts.

Regards,

Larry Meserve

Mission Director

USAID/Sudan

(b)(6)

Office: US VOIP: (202) - 216-6236 ext 2183

Cell:

[lmeserve@usaid.gov](mailto:lmeserve@usaid.gov)

## USAID

---

**From:** Kasey Channell <kchannell@usaid.gov>  
**Sent:** Thursday, May 07, 2015 8:51 AM  
**To:** Wilkes, Joseph  
**Cc:** Christie, Cara (DCHA/OFDA) [USAID]; Cohen, Harold (AGC/DCHA-BFS) [USAID]; Konyndyk, Jeremy; Clark, Michael A. (M/OAA/DCHA) [USAID]; Chan, Carol (DCHA/OFDA) [USAID]  
**Subject:** Re: FW: Licence to Pay ISRA Granted

Thanks Jay...and thank you for all your work in getting a resolution to this one.

-Kasey

Kasey Channell  
Africa Division Director  
Office of U.S Foreign Disaster Assistance  
USAID/DCHA/OFDA

202-712-4167  
[kchannell@usaid.gov](mailto:kchannell@usaid.gov)

On Thu, May 7, 2015 at 8:49 AM, Wilkes, Joseph <[JWilkes@ofda.gov](mailto:JWilkes@ofda.gov)> wrote:

FYI It looks as though the ISRA OFAC issue in Sudan has been resolved.

**Jay Wilkes**

*Disaster Operations Specialist*

U.S. Agency for International Development (USAID)

(b)(6)

Office of U.S. Foreign Disaster Assistance (OFDA)

Cell:

Office: [\(202\) 661-9372](tel:(202)661-9372)

[jwilkes@ofda.gov](mailto:jwilkes@ofda.gov)



**From:** Charles Wanjue [mailto:[cwanjue@usaid.gov](mailto:cwanjue@usaid.gov)]

**Sent:** Thursday, May 07, 2015 5:56 AM

**To:** Daniel Holmberg; Lea Swanson; Moeling, Benjamin X

**Cc:** Meserve, Lawrence (SUDAN/MD) [USAID] [redacted] [USAID]; Wilkes, Joseph (DCHA/OFDA) [USAID]

**Subject:** Fwd: Licence to Pay ISRA Granted

Good news and a great relief, really!

Thank you Ben for your help.

Regards,

**Charles Wanjue**

(b)(6) r Program Officer  
of U.S. Foreign Disaster Assistance (OFDA)  
U.S. Agency for International Development (USAID)  
US Embassy Khartoum  
Kilo 10, Soba, Khartoum, Sudan

**Mobile:** [redacted]

**Office:** +249 187022239

**Voip:** +1 202 216 6236

**Email:** [cwanjue@usaid.gov](mailto:cwanjue@usaid.gov)

(b)(6)

----- Forwarded message -----

**From:** [redacted]

**Date:** Thu, May 7, 2015 at 12:21 PM

**Subject:** Licence to Pay ISRA Granted

**To:** [imeserve@usaid.gov](mailto:imeserve@usaid.gov)

**Cc:** [cwanjue@usaid.gov](mailto:cwanjue@usaid.gov)

Greetings Larry and Charles.

Today, we received a licence to pay ISRA the 125,000 dollars that we owe them.

This comes as a great relief as ISRA had become restive and had threatened legal action, which would have damaged our reputation and standing in Sudan and the great work that we believe we are doing with conflict affected communities.

I am grateful to you advocating for us and supporting us through this process and providing Washington the information they needed to make this decision. It is a reflection of the confidence you have in us an agency and your desire to see us continue the work we are doing with the most vulnerable members of Sudanese society.

(b)(6) nteni sana!

(b)(6)  
(b)(6)  
(b)(6)

Telephone: [redacted]  
Email: [redacted]  
Skype: [redacted]

## USAID

---

**From:** Wilkes, Joseph  
**Sent:** Thursday, May 07, 2015 11:58 AM  
**To:** Freeman, Andrea (AFR/SP) [USAID] (afreeman@usaid.gov); Dworken, Jonathan (AFR/SSSP) [USAID] (jdworken@usaid.gov)  
**Cc:** Kaloides, Adam K [USAID]; Weiner, Marc (AFR/SP) [USAID] (mweiner@usaid.gov)  
**Subject:** FW: Licence to Pay ISRA Granted

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Hi Sudan team,

Some good news; it looks as though the World Vision-ISRA OFAC issue in Blue Nile has been resolved. Please let me know if you have any questions or concerns regarding this.

(b)(6) Wilkes  
Disaster Operations Specialist  
U.S. Agency for International Development (USAID)  
Office of U.S. Foreign Disaster Assistance (OFDA)  
Cell: [REDACTED]  
Office: (202) 661-9372  
[jjwilkes@ofda.gov](mailto:jjwilkes@ofda.gov)

**From:** Charles Wanjue [mailto:cwanjue@usaid.gov] (b)(6)  
**Sent:** Thursday, May 07, 2015 5:56 AM  
**To:** Daniel Holmberg; Lea Swanson; Moeling, Benjamin X  
**Cc:** Meserve, Lawrence (SUDAN/MD) [USAID]; [REDACTED] [USAID]; Wilkes, Joseph (DCHA/OFDA) [USAID]  
**Subject:** Fwd: Licence to Pay ISRA Granted

Good news and a great relief, really!

Thank you Ben for your help.

Regards,

---

**Charles Wanjue**  
Senior Program Officer  
Office of U.S. Foreign Disaster Assistance (OFDA)  
U.S. Agency for International Development (USAID)  
US Embassy, Khartoum  
Kilo 10, Soba, Khartoum, Sudan  
**Mobile:** [REDACTED]  
**Office:** +249 187022239  
**Voip:** +1 202 216 6236  
**Email:** [cwanjue@usaid.gov](mailto:cwanjue@usaid.gov)

(b)(6)

----- Forwarded message -----

From: [redacted]  
Date: Thu, May 7, 2015 at 12:21 PM  
Subject: Licence to Pay ISRA Granted  
To: [imeserve@usaid.gov](mailto:imeserve@usaid.gov)  
Cc: [cwanjue@usaid.gov](mailto:cwanjue@usaid.gov)

Greetings Larry and Charles.

Today, we received a licence to pay ISRA the 125,000 dollars that we owe them.

This comes as a great relief as ISRA had become restive and had threatened legal action, which would have damaged our reputation and standing in Sudan and the great work that we believe we are doing with conflict affected communities.

I am grateful to you advocating for us and supporting us through this process and providing Washington the information they needed to make this decision. It is a reflection of the confidence you have in us an agency and your desire to see us continue the work we are doing with the most vulnerable members of Sudanese society.

(b)(6) nteni sana!

(b)(6)

(b)(6)

World Vision Sudan  
Telephone: [redacted]  
Email: [redacted]  
Skype: [redacted]

## USAID

---

**From:** Wilkes, Joseph  
**Sent:** Monday, August 31, 2015 1:03 PM  
**To:** Holmberg, Daniel  
**Cc:** Wanjue, Charles [USAID]; Daniel Holmberg  
**Subject:** RE: A question about OFAC

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Gotcha, I read it wrong. Thanks!

JW

---

**From:** Holmberg, Daniel  
**Sent:** Monday, August 31, 2015 11:38 AM  
**To:** Wilkes, Joseph  
**Cc:** Wanjue, Charles [USAID]; Daniel Holmberg  
**Subject:** RE: A question about OFAC

It wasn't Larry, it was me.

(b)(6) Daniel Holmberg  
Humanitarian Advisor - Sudan  
Office of U.S. Foreign Disaster Assistance (OFDA)  
Khartoum office Tel: +249-1-870-22000 ext 2933  
Mobile in Sudan: [REDACTED]  
Mobile (International): [REDACTED]  
Email: [dholmberg@ofda.gov](mailto:dholmberg@ofda.gov) / [dholmberg@usaid.gov](mailto:dholmberg@usaid.gov)

---

**From:** Wilkes, Joseph  
**Sent:** Monday, August 31, 2015 3:48 PM  
**To:** Holmberg, Daniel  
**Cc:** Wanjue, Charles [USAID]; Daniel Holmberg  
**Subject:** RE: A question about OFAC

It looks like Larry has already done due diligence with this. I would leave it at that.

JW

---

**From:** Holmberg, Daniel  
**Sent:** Monday, August 31, 2015 7:51 AM  
**To:** Wilkes, Joseph (DCHA/OFDA) [USAID]  
**Cc:** Wanjue, Charles [USAID]; Daniel Holmberg  
**Subject:** FW: A question about OFAC

Hi Jay,

See below State dept guidance in regard to ISRA request to for guidance to getting off OFAC list.

Should I send them the link?

Please advise.

(b)(6) Daniel Holmberg  
(b)(6) Senior Humanitarian Advisor - Sudan  
(b)(6) Office of U.S. Foreign Disaster Assistance (OFDA)  
Khartoum office Tel: +249-1-870-22000 ext 2933  
Mobile in Sudan: [REDACTED]  
Mobile (International): [REDACTED]  
Email: [dholmberg@ofda.gov](mailto:dholmberg@ofda.gov) / [dholmberg@usaid.gov](mailto:dholmberg@usaid.gov)

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**From:** Streitfeld, Daniel S [<mailto:StreitfeldDS@state.gov>]  
**Sent:** Monday, August 31, 2015 2:02 PM  
**To:** Holmberg, Daniel  
**Cc:** Meserve, Lawrence (SUDAN/MD) [USAID]  
**Subject:** RE: A question about OFAC

Daniel –

Sounds like they are on the Specially Designated Nationals (SDN) list. Basically, they will need to appeal their case directly with OFAC. If they go to this link:

<http://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx>

Towards the middle of the page you will see there is a link for ‘Delisting Process’, which is actually just a link to an email address at OFAC to send appeals to. There’s some more legal information at this following link on what kind of appeals might lead to a de-listing:

<https://www.law.cornell.edu/cfr/text/31/501.807>

Regarding your comment about a lawyer, yes there are law firms and lawyers in Washington that specialize in these things. I don’t know much about the de-listing process, but if OFAC has gone to the trouble of putting a person or organization on the SDN list, it’s likely not going to be an easy process to get off it. So, off the record, I can’t imagine them getting anywhere without legal counsel. (And even then, my understanding is it’s not an easy process at all).

Hope this helps,  
Daniel

-----Original Message-----

From: Holmberg, Daniel [<mailto:dholmberg@ofda.gov>]  
Sent: Monday, August 31, 2015 1:43 PM  
To: Streitfeld, Daniel S  
Cc: Meserve, Lawrence (SUDAN/MD)  
Subject: A question about OFAC

Hi Daniel,

Attached is a scan of the business card of Islamic Relief Agency (ISRA). They used to be the local implementing partner for our USAID/OFDA INGO partner 'World Vision'. It came to light that they are on the OFAC list and the partnership was ended and all settled amicably last year. The Executive Director recently approached me for advice. ISRA believes that they are on the list erroneously. It's not my job to assist these people, but if they are on the list erroneously and can manage to get themselves off, I wish them well.

My assumption is that they need a lawyer in the U.S. and that there are probably common law firms that handle these issues.

Do you or others at Pol/Econ have guidance to offer this gentleman?

Please advise.

(b)(6)

el Holmberg

Senior Humanitarian Advisor - Sudan

USAID / Office of U.S. Foreign Disaster Assistance (OFDA) Khartoum office Tel: +249-1-870-22000 ext 2933 Mobile in Sudan:

Mobile (International):

Email: [dholmberg@ofda.gov](mailto:dholmberg@ofda.gov) / [dholmberg@usaid.gov](mailto:dholmberg@usaid.gov)

-----Original Message-----

From: Khartoum USAID Digital Sender2 [<mailto:Khartoum2@usaid.gov>]

Sent: Monday, August 31, 2015 10:03 AM

To: Holmberg, Daniel

Subject: ISLAMIC RELIEF AGENCY CARD

Please open the attached document. This document was digitally sent to you using an HP Digital Sending device.

SBU

This email is UNCLASSIFIED.



June 16, 2016

Alyssa Todhunter  
World Vision International  
34834 Weyerhaeuser Way South  
Federal Way, WA 98001  
United States

**Subject:** Acknowledgement of "No-Cost" Extension of Award No. AID-OFDA-G-14-00023-02

Dear Alyssa Todhunter:

This is to acknowledge your intent to extend the subject award for up to three months under the authority of Section 1.2 of the awards. This "no-cost" extension extends the subject award's end date, from June 30, 2016 to September 30, 2016.

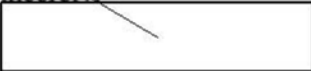
I hereby acknowledge such extension subject to the explicit understanding that:

1. The purpose of the extension is not solely to expend unobligated balances;
2. The terms and conditions of the award permit the extension;
3. No additional U.S. Government funds are required; and
4. The extension does not involve a change in the approved scope or objectives of the project.

Please be sure to attach a copy of this letter to all financial reports which include costs incurred after the estimated completion date set forth in the award (as it may have been amended) but within the period of such "no-cost" extension.

(b)(6) Should you have any questions about this extension, please contact me at 202-712-1709.

Sincerely,

  
Joseph Wilkes  
Agreement Officer's Representative

cc:  
Regional Advisor  
Regional Coordinator  
DCHA/OFDA/PS Grants Unit  
M/FM/Electronic Copy (ci@usaid.gov)



USAID's Office of U.S. Foreign Disaster Assistance (OFDA) would like to notify OFAC of an issue regarding USAID/OFDA award # AID-OFDA-14-00023 with World Vision (WV) in Sudan. During implementation of the award, OFDA became aware that one of the sub-awardees, Islamic Relief Agency (ISRA) approved in the award was on the Specially Designated National (SDN) list. Payments were made by World Vision under the USAID/OFDA award to ISRA; however, WV has confirmed that USAID has not reimbursed WV for payments made to ISRA.

The specific details of this incident are as follows:

- 3/14/2014 – The USAID Agreement Officer signed the subject award with WV, including the use of ISRA as a sub awardee.
- 7/1/2014 – OFDA entered into discussions with (b)(6) about a separate award, under which (b)(6) was considering using WV and its network of partners as a sub-awardees. During this review, (b)(6) identified the partnership with ISRA as an issue and referred the concern to both WV and OFAC. As it had difficulty determining whether ISRA was the same as that listed on the OFAC list, (b)(6) requested USAID assistance in interacting with OFAC. Through USAID's Office of the General Counsel (GC), USAID received confirmation from OFAC Office of the Chief Counsel that the organizations were one and the same (7/28/14 email). This was communicated by OFDA to (b)(6).
- 11/20/2014 – WV requested confirmation from OFAC as to the status of ISRA and requested verification that they were the same organization listed on the SDN list.
- 1/13/2015 – Following up on the WV inquiry, USAID GC received informal, verbal confirmation from OFAC Licensing that ISRA is the same organization listed on the SDN list.
- 1/26/2015 – USAID received confirmation from WV that they had been contacted by OFAC, which confirmed that ISRA is the same organization included on OFAC's Specially Designated Nationals and Blocked Persons List as a Specially Designated Global Terrorist. Furthermore, WV indicated OFAC denied WV's request for a specific license.

Immediately upon being alerted to this issue on January 13, 2014, OFDA has taken the follow steps to address the situation:

- Ensured further payments are not made to WV which may be used to support the activities conducted by ISRA.
- Began working with the Agreement Officer to request more detailed accounting of reimbursements made to date to determine what, if any, funds disbursed might be at issue.
- Initiated a review of OFDA's award processing procedures to ensure sub-recipients are checked against OFAC's SDN list.
- Requested a review of OFDA sub-awardees across all portfolios to determine if ISRA might have been a sub-awardee under additional mechanisms.

If you have any additional questions or concerns, please contact me at your convenience.

Kasey Channell  
Africa Division Director

Office of U.S Foreign Disaster Assistance  
USAID/DCHA/OFDA

202-712-4167  
[kchannell@usaid.gov](mailto:kchannell@usaid.gov)

## Jeffrey, Flis

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**From:** Wilkes, Joseph  
**Sent:** Thursday, November 20, 2014 3:39 PM  
**To:** Holmberg, Daniel  
**Subject:** RE: Potential Terrorism Ties: WV's Subgrantee Under AID-OFDA-G-14-00023 in Sudan

No!

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**From:** Holmberg, Daniel  
**Sent:** Thursday, November 20, 2014 2:17 PM  
**To:** Wilkes, Joseph  
**Subject:** Fwd: Potential Terrorism Ties: WV's Subgrantee Under AID-OFDA-G-14-00023 in Sudan

Jay am I having déjà vu or did we already deal with this organization and issue of islamic relief agency in an (b)(6) Grant?

Sent from my iPhone

Begin forwarded message:

**From:** Tyler Posey <[tposey@usaid.gov](mailto:tposey@usaid.gov)>  
**Date:** November 20, 2014 at 10:06:44 PM GMT+3  
**To:** "Wilkes, Joseph" <[JWilkes@ofda.gov](mailto:JWilkes@ofda.gov)>  
**Cc:** "Channell, Kasey (DCHA/OFDA) [USAID]" <[kchannell@usaid.gov](mailto:kchannell@usaid.gov)>, "Chan, Carol (DCHA/OFDA) [USAID]" <[cchan@usaid.gov](mailto:cchan@usaid.gov)>, "Konyndyk, Jeremy" <[jkonyndyk@ofda.gov](mailto:jkonyndyk@ofda.gov)>, "Christie, Cara (DCHA/OFDA) [USAID]" <[cchristie@usaid.gov](mailto:cchristie@usaid.gov)>, Daniel Holmberg <[dholmberg@usaid.gov](mailto:dholmberg@usaid.gov)>, "Wanjue, Charles [USAID]" <[cwanjue@usaid.gov](mailto:cwanjue@usaid.gov)>, "Aronson, Scott L. [USAID]" <[saronson@usaid.gov](mailto:saronson@usaid.gov)>, Martha Dye <[mdye@usaid.gov](mailto:mdye@usaid.gov)>  
**Subject:** **Re: Potential Terrorism Ties: WV's Subgrantee Under AID-OFDA-G-14-00023 in Sudan**

(b)(5) - Attorney-Client Privilege;(b)(5) - Deliberative Process Privilege

## USAID

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**From:** Wilkes, Joseph  
**Sent:** Tuesday, January 13, 2015 9:41 AM  
**To:** Clark, Michael A. (M/OAA/DCHA) [USAID]  
**Subject:** FW: Sudan Blue Nile Project Closeout Plan/Pipeline; Update on ISRA  
**Attachments:** WV\_Sudan Blue Nile Recover Program 2014\_Pipeline\_2015 1 8.xlsx; OFDA Blue Nile Project Closeout Plan 9th January 2015.doc; AID-OFDA-G-14-00023.pdf; Potential Terrorism Ties: WV's Subgrantee Under AID-OFDA-G-14-00023 in Sudan

Hi Michael,

At your earliest convenience, please call me regarding this matter with OFDA awardee World Vision (WV). To summarize, WV is currently investigating a sub-grantee, ISRA, for potentially having a relationship to a specially designated global terrorist (SDGT). Please note that WV has now ceased all payments to ISRA until this matter is clarified, and has reached out to OFAC regarding their transactions with ISRA. Our office has reached out to OFAC to be part of the discussion regarding this matter, and are awaiting their response on this. Furthermore, no vouchers will be approved for this award while this matter is pending.

Further guidance on this matter would be appreciated.

Thanks,

**Jay Wilkes**

Disaster Operations Specialist  
East and Central Africa (ECA)  
USAID/DCHA/OFDA  
(202) 661-9372  
[jwilkes@usaid.gov](mailto:jwilkes@usaid.gov)

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**From:** Jill Byrd - US [<mailto:jbyrd@WorldVision.org>]  
**Sent:** Friday, January 09, 2015 3:27 PM  
**To:** Wilkes, Joseph (DCHA/OFDA) [USAID]  
**Cc:** Aronson, Scott; Christie, Cara (DCHA/OFDA) [USAID]; Debebe Dawit - US; Sylvia Mallet-Beke - US; Alyssa Todhunter - US  
**Subject:** Sudan Blue Nile Project Closeout Plan/Pipeline; Update on ISRA

Greetings,

We continue to wait on a response from OFAC. As it has taken more time than we wished, we have also solicited support from the State Department, as well as a Congressman, with the hope that it will speed up OFAC's process/response. Our contact at State has a very limited perspective on OFAC's review and has cautioned us to wait for OFAC's official assessment, but based on what our contact has seen, the tentative indication is that there is no issue with ISRA Khartoum. We continue to await OFAC's formal written assessment.

We will be sure to keep you updated as to any further information we receive, but also feel free to check-in whenever you wish.

In addition, please find attached our closeout plan and pipeline.

If you have any questions, please do not hesitate to contact Alyssa Todhunter at [atodhunt@worldvision.org](mailto:atodhunt@worldvision.org) or Debebe Dawit at [ddawit@worldvision.org](mailto:ddawit@worldvision.org).

Sincerely,  
Jill Byrd (on behalf of Alyssa Todhunter)

Jill E. Byrd  
Senior Grant and Contract Officer/Grant and Contract Services/Legal Department/Strategic Solutions  
World Vision, Inc. (WVUS)

**Phone:** 253.815.2687 | **Fax:** 253.815.3444 | [jbyrd@worldvision.org](mailto:jbyrd@worldvision.org) | **Skype ID:** jill.byrd  
**Street Address:** 34834 Weyerhaeuser Way South | MS 657 | Federal Way, WA 98001 USA  
**Mailing Address:** PO Box 9716 | MS 657 | Federal Way, WA 98063-9716 USA

World Vision | Building a better world for children | [www.worldvision.org](http://www.worldvision.org)  
World Vision is a Christian relief and development organization dedicated to helping children and their communities worldwide reach their full potential by tackling the causes of poverty. We serve the world's poor, regardless of a person's religion, race, ethnicity, or gender.

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## USAID

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**From:** Wilkes, Joseph  
**Sent:** Thursday, January 15, 2015 2:12 PM  
**To:** Channell, Kasey (DCHA/OFDA) [USAID]  
**Cc:** Siganda,Carolyn [USAID] (csiganda@usaid.gov); 'Daniel Holmberg'  
**Subject:** Draft Letter to World Vision and Reimbursement News  
**Attachments:** OFDA Blue Nile Project Closeout Plan 9th January 2015.doc; 01.15.2015 - WV ISRA Letter DRAFT.doc

Hi Kasey,

Please see the attached draft letter to World Vision regarding next steps for providing us with information regarding ISRA, it also includes the NCE acknowledgment language.

Also, some good news: After searching relentlessly in ASSIST to see what reimbursements were approved under this award, none were found. Furthermore, WV states in their closeout plan (attached) that "World Vision has not done further fund transfer to ISRA other than the initial advance of 39,759 USD (not yet submitted to OFDA for reimbursement). While it's unfortunate that WV has made a payment to ISRA, it currently appears that this was not reimbursed by USAID.

Please let me know if you have any questions or concerns regarding either the letter or the closeout document attached.  
JW

**Jay Wilkes**  
Disaster Operations Specialist  
East and Central Africa (ECA)  
USAID/DCHA/OFDA  
(202) 661-9372  
[jwilkes@usaid.gov](mailto:jwilkes@usaid.gov)

**Executive Summary:**

World Vision, Inc. (WV) seeks a new award from the Office of Foreign Disaster Assistance (OFDA) for a twelve-month project to improve water, sanitation and hygiene and to increase food security in Sudan's Blue Nile state.

The project targets the localities affected by renewed conflict since 2011, which has resulted in widespread disruption and destruction to the lives and livelihoods of an already vulnerable population. According to UNOCHA, a total of 160,000 people have been newly displaced across the state. The project will be primarily targeted at Baw and Geissan villages, where selected villages have seen their populations double due to the arrival of IDPs since 2011.

Since 2011, humanitarian access has been heavily restricted due to security concerns, but also due to new and significant operational restrictions by the government. WV maintained a presence in Blue Nile state throughout the conflict. Since April 2013, it has been able to recommence operations, following the partial lifting of restrictions by government. The targeted areas are accessible both from a security perspective and in terms of government permission, although a condition placed on all INGOs is that all humanitarian operations in Blue Nile must be carried out via local partners. Restrictions also remain on data collection within the state.

The project aims to improve the well-being of vulnerable households by reducing the incidence of waterborne and sanitation-related diseases in target communities and by increasing the food security and livelihood sectors for populations displaced in the latest conflict in Blue Nile State.

Implementation will be in partnership with a local NGO (Islamic Relief Agency), with which WV has prior working experience and has conducted thorough capacity assessments. Partner implementation will be supported and monitored directly by WV field-based staff.

though, to reach areas that are currently difficult to access. World Vision will notify OFDA if this necessitates changes to target locations.

Most displacement occurred in late 2011, but the situation remains unsafe for IDPs to return. Sporadic conflict still leads to new displacements. Moreover, humanitarian access was restricted until very recently, meaning that IDPs were without external support for most of the post-conflict period. Needs remain high and World Vision (through its local partners) now has sufficient access to initiate this intervention. The proposed intervention is necessary to meet emergency WASH-needs and to provide livelihood support, particularly support for IDPs who have lost their livelihood sources due to displacement.

World Vision is well placed to implement this project, having remained in the state throughout the recent conflict, and holding strong relationships with local authorities and local implementing partners, which have been selected following a thorough capacity assessment. Direct implementation by international NGOs is not permitted in Blue Nile state. But World Vision has the technical expertise and monitoring capacity to successfully support and ensure accountability from its local partner, with considerable global experience in this operational model from other countries, such as in south-central Somalia.

The proposed program fits well with OFDA's mandate to save lives and alleviate human suffering. In an area that is dramatically underserved by humanitarian actors, OFDA's contribution will meet emergency WASH and AFS needs while building the framework for a sustainable recovery for conflict-affected persons in Blue Nile.

#### **Gender, Elderly, and Disabled Analysis for Target Area**

Gender relations in the target area remain highly traditional and have changed little in recent decades. Women are highly active, shouldering the bulk of the burden, not only for housework and child rearing, but also in farm work and supplementary income generation. Women are also generally active in market participation. Men, though, are the primary decision-makers in household matters and especially in community-level decision-making.

Agricultural work (including work with livestock) is very much considered a whole-of-household activity, particularly during peak periods of the season. Both women and men are actively involved in farming work and possess the necessary skills. Female-headed households are at a disadvantage because they generally have to carry the entire farming burden alone on top of their other household responsibilities. Thus, productivity is likely to suffer. Children are often involved in farm work as well during peak times, particularly in families where the supply of adult labor is low (e.g. in female-headed households or where adults are elderly or disabled). For these reasons, female-headed households and those households with other labor-related disadvantages (**including elderly and disabled**) will be prioritized amongst beneficiaries of agricultural activities, notably seed voucher distribution. Within male-headed households, seed vouchers will be distributed to men in alignment with cultural norms and expectations, but WV has no evidence to suggest that this does not lead to a whole-of-household benefit. **Where disabled or elderly are heads of households, additional support will be provided at seed fairs and other activities to ensure they are full able to participate.**

Women (and girls) also carry the bulk of the burden of water collection. Thus, increased accessibility of drinking water will be of particular benefit to women and girls. Greater accessibility of clean drinking water and improved hygiene practice will benefit the whole household, notably infants who are most vulnerable to water-borne diseases. Mothers will be targeted for specific activities, notably training in



Assumption	Risk Indicators	Consequence (Fatal, Serious, Manageable)	Mitigation
Local communities and authorities are supportive, active and cooperative in implementation of project activities; WV is able to convince community leaders to allow women to participate in activities	Communities do not provide inputs; water systems, farms and latrines destroyed or neglected; women do not participate equally in all activities	Serious	Maintain good relations with local authorities and communities in both states as well as area based organizations; required community inputs clearly stipulated in MoUs; ongoing discussion with local authorities and community leaders on program objectives in both states
Sound coordination mechanisms are maintained and promoted	Duplication of activities	Manageable	World Vision will continue to attend all field and Khartoum level meetings for general issues and project coordination.
Flooding and heavy rains do not exceed normal levels	Access to project areas impeded and cause communities to return to immediate emergency aid	Serious	World Vision is in the process of acquiring pre-positioned NFIs to ensure that it is able to respond immediately to flooding and other natural disasters
No major disease outbreaks among the target populations	Increased incidence of water-borne diseases up to epidemic proportions	Serious	World Vision will support dissemination of information on early warning systems that will help the communities and the government to detect disease outbreaks early and as part of its hygiene promotion campaigns
HAC and State authorities permit access to implement project	Refusal of INGO local staff access to beneficiary sites and monitoring	Manageable	World Vision is working with communities, local organizations and HAC to ensure that a strong accountability, monitoring and evaluation systems are in place so that reporting and supporting documentation permits access to beneficiaries.
Project activities contribute to peace-building among diverse groups	Disputes and violence over various issues, such as access to land and resources, including those related to the project	Serious	Activities designed with a Do No Harm lens to support integration and mitigate conflict; simultaneous local capacity for peace initiatives will support timely conflict identification and resolution. Beneficiaries will be selected from the IDPs communities but also include vulnerable members of the host community where relevant

#### *d. Program Strategy*

Throughout the conflict World Vision has maintained staff and offices in Damazin to smooth the return to programming once access was permitted. This has also helped World Vision to maintain relationships with communities, government authorities and other local stakeholders. World Vision also has a strong relationship with a number of locally based NGOs, through which implementation of its Blue Nile program now takes place, in accordance with government regulations.

For this program, World Vision has selected the Sudanese NGO Islamic Relief Agency (ISRA) to implement the program as a sub-grantee. ISRA was formed in 1981 and has been operational in Blue

sector coordination meetings in Damazin and Khartoum, including FAO's Food Security and Livelihoods Forum. World Vision has signed technical agreements for cooperation on program implementation and service provision under this project with the GoS Ministry of Agriculture, the Ministry of Animal Resources and Fishery it is now part of a special private public food security committee that is being created by the European Union.

**World Vision collaborates strongly with state line ministries on all issues relating to the implementation of all its agriculture and food security-related activities.** World Vision and the Ministry of Animal Resources have agreed on target villages to avoid duplication of interventions. The Ministries for Agriculture and Animal Resource and the Agricultural Research Center (ARC) are key collaborators with World Vision at the federal, state and local levels. Major project trainings are coordinated with these bodies and joint training is conducted for staff and beneficiaries in the field. In addition, new agriculture, livestock and forestry initiatives are researched and piloted together. Some of the major areas of coordination **(for this program and World Vision's wider activities within the state)** include: (1) training activities organized in conjunction with technical staff from the local and state ministries, covering crop production, irrigation and water management, Integrated Pest Management (IPM), livestock health care, land preparation, and soil fertility; (2) technical activities coordinated and supported by the ministries, including animal vaccination, seed quality control for seed voucher and fairs, and tree planting campaigns; and (3) collaboration with ARC for key agricultural initiatives, such as the testing and multiplication of crop varieties.

World Vision also coordinates with national (e.g. Mubaridoon) and international NGOs working the state, including Islamic Relief and ADRA.

(a)	Sub-Sector Name:	Improving Agricultural Production / Food Security
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(b) Technical Design

**Activity 2.1.1: Seed Fairs for Vulnerable Households**

World Vision will assist **4,000** of the most vulnerable households with seed inputs for the rain-fed crop production. Seed fairs are considered the best method of support as they enhance farmer choice and reinforce local seed markets. World Vision has experience of seed fairs in Blue Nile state (Kurmuk, Baw and Geissan localities) having provided seed to 4,400 households through seed vouchers in 2011 (funded by European Commission and Common Humanitarian Fund).

The project will supply only a portion of each beneficiary farmer's planting needs—roughly one third. Currently, farmers' purchasing power is very low due to lack of income, but some willingness and ability to purchase seeds remains, and this will be encouraged. For the remainder of needed seed input, vouchers at the seed fairs will fill the gap and preserve farmer choice. Each beneficiary will receive \$29 worth of voucher value, with an additional \$1 going to implementation and monitoring costs, including the printing of vouchers. All

CROP	LOCAL VARIETIES & CULTIVARS
Millet	Bitalahaw, Kanow, Baioda
Groundnut	Sodari, Barbirton, Tajarob
Sorghum	Gadamalhamam, Banatsamheen, Najad, Aboudign, Wadahamad, B9
Okra	Reagan, Kuri, Dagarais
Water melon	Congo (Sugar), Charleston, Crimson
Tomato	Strain B, Super Strain B, Riogrand, Bito 85
Cowpea	Local (Buff)
Hibiscus	Dark red
Cucumber	Baladi
Pepper	Hot

## **C) TRANSITION OR EXIT STRATEGY**

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World Vision's Design, Monitoring and Evaluation (DME) guidelines mandate an exit and transition strategy for all programs and projects. The key to program impact and sustainability is strengthening the capacity of community members to manage their own development. The project will work to strengthen CBOs serving Baw and Geissan localities in Blue Nile by involving them in the implementation of the project. All CBOs working in the target area together with the WSCs will be trained and empowered to take over the management of the facilities in the communities at the end of the project. To ensure sustainability of the wells, water and sanitation management committees will be trained and encouraged to collect water user fees for repair and maintenance purposes.

An important aspect of the development continuum strategy for World Vision is capacity building. There is an intentional effort to transfer skills and knowledge to World Vision's national staff as they assume greater responsibilities. Local participation in project planning and implementation will be given importance in order to strengthen local leadership and mobilization skills. Further, World Vision collaborates with relevant government Ministries for agriculture and WASH. This collaboration allows for joint planning and supervision of activities. It also helps to increase the capacity of local government and community-based organizations to plan and implement activities, serve beneficiaries, and mitigate the effects of disaster and conflict.

After the project, water and sanitation committees will continue to support their communities. In addition, by transferring knowledge and information on the importance of good hygiene practices and by creating conditions for daily hygiene behaviors, the project will lead to a sustainable reduction in morbidity and mortality rates in the target communities.

IDPs are expected to return to their homes and they have incentive to do so in order to access their land. Returns will not, however, be possible until the security situation improves. In the meantime, World Vision believes it is important to avoid over-provision to IDPs in order that returning home remains a preferred option. It is expected, though, that support for IDPs will be needed in order to facilitate returns. World Vision expects to be in a position to shift its programming focus to support this, once the security situation allows this.

## **D) MONITORING AND EVALUATION**

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### **I. Monitoring Plans**

Program monitoring will be ongoing throughout the project. World Vision's Monitoring and Evaluation (M&E) Advisor will work with project staff to design monitoring tools that will help the field staff track activities and outputs in accordance with the established work plan. A project baseline will be undertaken and will be reviewed at the end of project via an external project evaluation. The M&E Advisor will ensure that field systems are in place to accurately track information related to the planned outputs. Output data collected by the project staff will be used by the M&E Coordinator and the Program Coordinator to compile periodic progress reports as required by OFDA and World Vision's internal reporting requirements. Reports for OFDA will be reviewed and finalized by World Vision for timely submission. If unexpected issues arise, such as the project implementation falling behind schedule or planned output targets are not being achieved, the Project Manager and Technical Specialists will review obstacles encountered and address the pace of implementation with field staff. World Vision's Senior Sector Specialist will be responsible for monitoring the quality of the work performed. The

## **SUB AWARDS: \$200,000**

**WV** will sub grant a total of **US \$ 200,000** to its local partner in **Blue Nile**, all the funding being requested from **OFDA**. The local partner, **ISRA**, will utilize the funding as explained herein: *[Please see also Excel budget, tab "ISRA Budget"]*.

### **Program Manager**

The **Program Manager** will have the overall responsibility of the project. He/she will ensure quality and timely completion of activities as per guidelines. He/she will devote 20% of their time to the project and will be responsible for both **WASH & FSL Project Coordinators**

This position budgeted at a total cost of \$ (b)(4)

### **Project Coordinator WASH and FSL**

The project will have two project coordinators one will be responsible of **WASH** sector while other will be responsible of Food security, both of them will be 100% responsible of **WASH & FSL**, planning, reporting and supervise the project staffs.

This position budgeted at a total cost of \$ (b)(4)

### **Hygiene Promoter:**

Two **Hygiene Promoter** will be hired for the project to guide the field teams regarding technical issues in the target areas. He/she will ensure quality and timely completion of activities as per guidelines. He/she will devote 100% of their time to the project and will be both responsible for field coordination of water sector development related activities and sanitation sector facilities construction as per project plans. He/she will also ensure quality control and monitoring of all construction, including well rehabilitation, latrine construction, and other activities set forth in the implementation plan. He/she will be primarily responsible for quality delivery and **SPHERE** standard adherence for all hardware and software components of the project. This position budgeted at a total cost of \$ (b)(4) with monthly rate of (b)(4)

### **Community Mobilizes**

The project will have one **Community Mobilizes** who will devote 100% of he is time mobilizing the target communities to attend hygiene education campaigns as well as the training communities on the appropriate ways of **PHAST** and **CLTS**. They will also conduct house-to-house visits to track behavior, attitude, and practices plus other activities set forth in the implementation plan. The total cost for the **Hygiene Promotion Educators** will be \$ (b)(4) and monthly rate of \$ (b)(4)

### **Senior Agriculture Officer**

One **Technical Field Supervisor** will be hired for the project to guide the field teams regarding technical project issues in the field. He/she will ensure quality and timely completion of activities as per guidelines. He/she will devote 100% of his/her time to the project and will be both responsible for field coordination of **Food Security** sector development related activities and sanitation sector facilities construction as per project plans. He/she will also ensure quality control and monitoring of all crop and livestock activities and related activities set forth in the implementation plan. He/she will be primarily responsible for quality delivery and **SPHERE** standard adherence for all hardware and software components of the project. These positions budgeted at a total cost of (b)(4) monthly rate of (b)(4)

### **Field Extension Officer**

## INTRODUCTION

Blue Nile State is located in the South-Eastern Sudan. It is bordered by, Ethiopia to the East, Upper Nile region to the South and West and Sinnar State to the North

Constant conflict has caused population displacement of host communities, IDPs, refugees and returnees, and resulted in an interruption in social services (including WASH facilities) and humanitarian assistance to affected populations. The Government denied access to all UN and INGOs to implement activities in the State. At the moment they can only work in partnership with local NGOs, which has escalated the humanitarian crisis due to the fact that they cannot conduct any assessments to collect information about the exact number of population displacement, refugees and returnees and their situations so as to determine the urgent needs.

This project implemented in partnership with Islamic Relief Agency (ISRA)-a national non-governmental organization and Water Environmental and Sanitation Project (WES), the State Ministry of Education - School Health Department and the State Ministry of Health. This report summaries the progress of implementation of the project in Baw and Geissan Localities for the second quarter, 1<sup>st</sup> April – June 30<sup>th</sup> 2014.

### **Program overview and performance**

The project targets a total of 45,043 individuals including 23,794 Internally Displaced Persons (IDPs) and returnees from Baw and Geissan Localities, implementing the WASH project under Water sub-sector, Sanitation sub-sector and Hygiene sub-sector.

**Project goals:** Improved food security and health through WASH and AFS services to conflict-affected households in Blue Nile state

**Project objective:** Improved access to safe water, sanitation and hygiene in Blue Nile state.

**Jay Wilkes**

Disaster Operations Specialist

East and Central Africa (ECA)

USAID/DCHA/OFDA

(202) 661-9372

[jwilkes@usaid.gov](mailto:jwilkes@usaid.gov)

---

**From:** Jill Byrd - US [<mailto:jbyrd@WorldVision.org>]

**Sent:** Friday, January 09, 2015 3:52 PM

**To:** Siganda, Caroline; Aronson, Scott

**Cc:** Wilkes, Joseph (DCHA/OFDA) [USAID]; Christie, Cara (DCHA/OFDA) [USAID]; Debebe Dawit - US; Sylvia Mallet-Beke - US; Alyssa Todhunter - US

**Subject:** Sudan Blue Nile Program #AID-OFDA-G-14-00023: No-Cost Extension

**Importance:** High

Greetings,

In accordance with Section 1.2(c)(5)(A) of the subject grant agreement, World Vision (WV) seeks your acknowledgement of our intent to extend the grant term for three (3) months. With your acknowledgement, the new estimated completion date will be April 30, 2015, which will allow WV to complete the following activities:

1. World Vision has to look for another local organization to complete the remaining activities of the project if indeed ISRA is confirmed to be a blocked party.
2. Complete Food Security Activities: Completion of vaccination campaign and refresher training of 25 CAHWs.
3. Complete WASH Activities: Completion of one VIP school latrine in Abushanina and Completion of establishing additional school health clubs, and CLTS training.
4. To conduct End of project Evaluation and to produce End of project final report.

This no cost extension is necessary for two reasons:

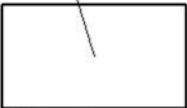
1. Subgrantee implementation activities had to be put on hold once it came to WV's attention that its sub-grantee, Islamic Relief Agency (ISRA-Khartoum), might possibly be listed as a sanctioned organization by the Office of Foreign Assets Control (OFAC). WV contacted OFAC on November 19<sup>th</sup>, and is currently still waiting for a reply to its request for confirmation as to whether ISRA-Khartoum is indeed a sanctioned organization.
2. There have been frequent security-related challenges, which have caused some delay on project implementation.

This extension does not require additional Federal funds nor does it currently involve changes in the approved objectives or the scope of the project. A pipeline budget analysis has been provided for your information.

If you have any further questions, please feel free to contact me at [atodhunt@worldvision.org](mailto:atodhunt@worldvision.org) or Debebe Dawit at [debebedawit@worldvision.org](mailto:debebedawit@worldvision.org).

(b)(6)

Respectfully,



Jill Byrd (on behalf of Alyssa Todhunter)

Jill E. Byrd  
Senior Grant and Contract Officer/Grant and Contract Services/Legal Department/Strategic Solutions

World Vision, Inc. (WVUS)

**Phone:** 253.815.2687 | **Fax:** 253.815.3444 | [jbyrd@worldvision.org](mailto:jbyrd@worldvision.org) | **Skype ID:** jill.byrd  
**Street Address:** 34834 Weyerhaeuser Way South | MS 657 | Federal Way, WA 98001 USA  
**Mailing Address:** PO Box 9716 | MS 657 | Federal Way, WA 98063-9716 USA

World Vision | Building a better world for children | [www.worldvision.org](http://www.worldvision.org)

World Vision is a Christian relief and development organization dedicated to helping children and their communities worldwide reach their full potential by tackling the causes of poverty. We serve the world's poor, regardless of a person's religion, race, ethnicity, or gender.

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## USAID

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**From:** Wilkes, Joseph  
**Sent:** Wednesday, January 21, 2015 9:11 AM  
**To:** Channell, Kasey (DCHA/OFDA) [USAID]  
**Cc:** Siganda, Carolyne [USAID] (csiganda@usaid.gov)  
**Subject:** FW: World Vision - urgent clarification needed re Sudanese partner - moving ahead

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

FYI: WV record of events.

---

**From:** Mark Smith - US [mailto:masmith@worldvision.org]  
**Sent:** Tuesday, January 20, 2015 6:08 PM  
**To:** Clark, Michael A. (M/OAA/DCHA) [USAID]; Wilkes, Joseph  
**Cc:** Debebe Dawit - US  
**Subject:** FW: World Vision - urgent clarification needed re Sudanese partner - moving ahead

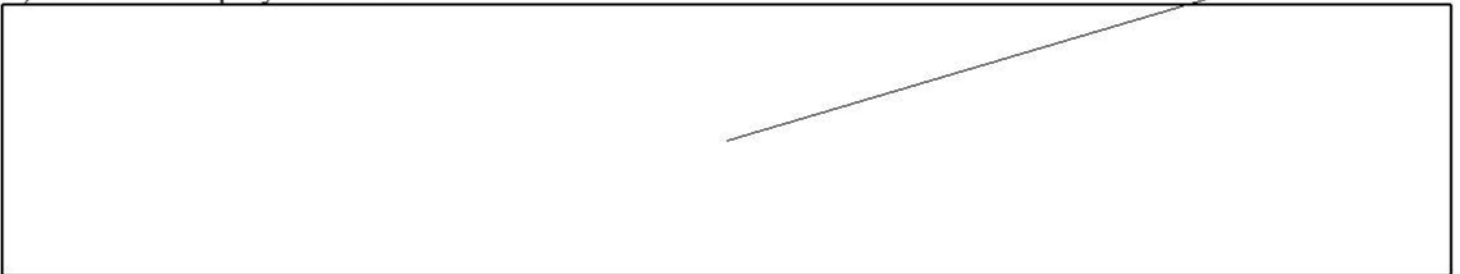
Jay and Michael:

Thank you so much for the conference call on January 20 and the time you and Michael Clark afforded for World Vision, Inc. (WVUS) to provide an update as to its inquiry to OFAC. As we discussed, World Vision has sent a notice to OFAC indicating World Vision's intention to begin transactions with Islamic Relief Agency (IRA) in Khartoum. There was slight miscommunication between my legal counsel and myself regarding the amount of detail that we intend to provide to OFAC. Actually, World Vision provided a very brief notice to OFAC. If OFAC responds with questions, World Vision would then be happy to provide additional information to OFAC. The notice to OFAC is at the bottom of this email.

Since I provided World Vision's thought process in our phone call, I thought it may be helpful for your review to summarize the points here:

(b)(5) -  
Deliberative  
Process

1) Genesis of inquiry to OFAC:



2) Almost complete silence from OFAC for 2 months except for an email on the 29<sup>th</sup> of December asking WV if there is any additional or new information.

3) Indicators that OFAC has no information to support a sanction against IRA:

- OFAC approved WVI and WVUS's licensing renewal application for the Sudanese country sanctions in 2014. The license application listed IRA as WV's only subgrantee. OFAC did not raise an issue at that time.
- State's preliminary assessment based on what OFAC has shared with State, is that there is no issue with IRA. State has cautioned that WV should not rely on State's preliminary assessment because OFAC may have information that it has not yet shared with State.



(b)(5) -  
Deliberative  
Process

- State contact believes, from her conversations with OFAC officials, that OFAC is only concerned about IRA because WV raised the question.

4) Given that two months have gone by with almost no contact from OFAC, and despite efforts by our State contacts, White House contacts, and a Congressman, OFAC has shown no signs that it will respond to WV's inquiry in the near future.

5) While recognizing that OFAC may not give strong weight to the programmatic impact of its sanctions programs, World Vision is keenly aware of the impact to the Sudanese communities due to IRA's stopped work. IRA has performed excellent work under the OFDA award and the other funding streams that WV utilizes. Moreover, putting contractual relationships in limbo for such a long period is putting a significant strain on WV's relationships within Sudan, especially the Sudanese government.

6) Given that WV has no information to substantiate any issue with IRA, other than the ambiguity of the relationships between Islamic Relief Agencies and OFAC's silence, WV has submitted a notice to OFAC indicating WV's intention to restart work with IRA and to transact with IRA. WV plans to give OFAC one week to react, and then will move forward with IRA.

At least some of the work being performed in Sudan through World Vision and IRA is funded by OFDA, and so we will be eager to hear from OFDA before the one week time frame as well to clarify World Vision's way forward.

If you have any questions, don't hesitate to ask.

Sincerely,

(b)(6) k

Mark C. Smith | Senior Director, Humanitarian and Emergency Affairs | World Vision | 300 I St. NE | Washington D.C., 20002 |  
Office: +1.202.572.6510 | Mobile: [redacted] | Skype: markcsmith1958 | [masmith@worldvision.org](mailto:masmith@worldvision.org) |

---

**From:** [Tim\\_Burgett@wvi.org](mailto:Tim_Burgett@wvi.org) [mailto:[Tim\\_Burgett@wvi.org](mailto:Tim_Burgett@wvi.org)]  
**Sent:** Tuesday, January 20, 2015 4:26 PM  
**To:** [Aydin.Akgun@treasury.gov](mailto:Aydin.Akgun@treasury.gov)  
**Cc:** [Andrew.Sens@treasury.gov](mailto:Andrew.Sens@treasury.gov); Matthew Harvey/WVIO/WorldVision; Steve Mcfarland - US  
**Subject:** Fw: World Vision - urgent clarification needed re Sudanese partner - moving ahead

(b)(5) - Attorney-Client Privilege

(b)(5) - Attorney-Client Privilege

Sincerely,

\*\*\*\*\*  
Tim Burgett  
General Counsel, Chief Legal Officer  
World Vision International  
Monrovia, California, USA  
Telephone: +1-626-305-7890  
E-mail: [tim\\_burgett@wvi.org](mailto:tim_burgett@wvi.org)

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## USAID

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**From:** Holmberg, Daniel  
**Sent:** Wednesday, January 21, 2015 1:20 PM  
**To:** Wilkes, Joseph (DCHA/OFDA) [USAID]  
**Cc:** Platt, Georgianna (OFDA/ECARO) [USAID]  
**Subject:** FW: World Vision Call re: ISRA and OFAC

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Hi Jay,

Thanks for this. Why would WVI consider resuming work with ISRA? It doesn't make sense, unless it is there way of pressuring a response from OFAC.

What is the end date of this grant? I am concerned that they have lost a lot of ground that they will not be able to make up. Can't understand why they have not spent this time hunting for a new partner.

Perhaps we can talk soon on this.

Daniel Holmberg  
Senior Humanitarian Advisor - Sudan  
USAID / Office of U.S. Foreign Disaster Assistance (OFDA)  
Khartoum office Tel: +249-1-870-22000 ext 2933  
Mobile in Sudan: (b)(6)  
Mobile (International): +1-571-721-0468  
Email: [dholmberg@ofda.gov](mailto:dholmberg@ofda.gov) / [dholmberg@usaid.gov](mailto:dholmberg@usaid.gov)

**From:** Clark, Michael A. (M/OAA/DCHA) [USAID]  
**Sent:** Wednesday, January 21, 2015 1:20 AM  
**To:** Wilkes, Joseph  
**Cc:** Cohen, Harold (AGC/DCHA-BFS) [USAID]; Siganda, Carolynne [USAID]; Channell, Kasey (DCHA/OFDA) [USAID]; Daniel Holmberg  
**Subject:** Re: World Vision Call re: ISRA and OFAC

Thanks, Jay.

Looks good to me. Just one additional note, we did not agree with their intent to resume working with ISRA on February 1st, only that they should send us the rationale, and we will continue to verify the status on this end before we would agree that it is appropriate for them to proceed.

Thanks again,  
Mike

On Tue, Jan 20, 2015 at 4:57 PM, Wilkes, Joseph <[JWilkes@ofda.gov](mailto:JWilkes@ofda.gov)> wrote:

All,

A quick update regarding USAID/OFDA award AID-OFDA-G-14-00023 to World Vision in Sudan. Award Agreement Officer (AO) Michael Clark and I spoke today with Mark Smith, World Vision Director of Awards and Compliance , and Debebe Dawit, World Vision Country Director for Sudan Programs. World Vision covered the following:

- The steps World Vision has taken thus far regarding their work with sub-awardee Islamic Relief Agency (ISRA), and how they have suspended operations since November, 2014. A detailed summary page is attached;
- OFAC has yet to confirm with World Vision as to the final status of ISRA being on the Specially Designated National (SDN) list;
- World Vision will be sending a formal letter to OFAC this week (and providing a summary for USAID) advising them that if they do not hear from OFAC regarding this matter, they will resume working with ISRA effective February 1, 2015;
- World Vision also reminded USAID that a No-Cost Extension letter has been submitted for acknowledgment from the AO/AOR.

Michael, please add topics I may have overlooked or need further clarification. We should be hearing more from World Vision on this matter tomorrow or Thursday.

Please let me know if you have any questions or concerns. I am available at your convenience.

Bes regards,

**Jay Wilkes**

Disaster Operations Specialist

East and Central Africa (ECA)

USAID/DCHA/OFDA

(202) 661-9372

[jwilkes@usaid.gov](mailto:jwilkes@usaid.gov)

**From:** Michael Clark [<mailto:mclark@usaid.gov>]

**Sent:** Friday, January 16, 2015 4:32 PM

**To:** Wilkes, Joseph  
**Subject:** Re: World Vision Call re: ISRA and OFAC

Hi Jay,

Best times for me on Tuesday are before 3:00 PM.

Thanks,

Mike

On Fri, Jan 16, 2015 at 3:45 PM, Wilkes, Joseph <[JWilkes@ofda.gov](mailto:JWilkes@ofda.gov)> wrote:

Hi Michael,

I just got off the phone with Mark Smith, World Vision's Senior VP of Grants and Compliance. To summarize, he was looking to share with OFDA the steps WV has taken with regards to ISRA, outline their way forward, and accept suggestions from USAID on how to best resolve this.

Are you available to have a conversation with WV on this next Tuesday afternoon? Let me know and I will set up a conference call for all parties. Kasey, Carlyne and Hal, you are welcome to join as well.

JW

**Jay Wilkes**

Disaster Operations Specialist

East and Central Africa (ECA)

USAID/DCHA/OFDA

(202) 661-9372

[jwilkes@usaid.gov](mailto:jwilkes@usaid.gov)

--

Michael A. Clark  
Division Chief  
USAID Office of Acquisition & Assistance  
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Washington, DC 20523

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Email: [mclark@usaid.gov](mailto:mclark@usaid.gov)

## USAID

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**From:** Holmberg, Daniel  
**Sent:** Thursday, January 22, 2015 5:05 AM  
**To:** Wilkes, Joseph  
**Subject:** Important: World Vision Call re: ISRA and OFAC

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Jay,

A few points:

- How much work didn't get done in the current grant because of this?
- Why did they not start searching for a new local partner?
- What is the the signing date and end date for the current grant and what is the proposed end date for the NCE. Given (my assumption) that they have NOT been implementing many aspects of the grant since Nov, where do we stand?
- If they actually said that they wanted to resume work with ISRA, while knowing that it was 99% likely that ISRA was on the list then I am concerned about our partnership with them, and whether it should continue.

Lets have a phone call about this.

(b)(6) Daniel Holmberg  
(b)(6) Senior Humanitarian Advisor - Sudan  
D / Office of U.S. Foreign Disaster Assistance (OFDA)  
Khartoum office Tel: +249-1-870-22000 ext 2933  
Mobile in Sudan: [REDACTED]  
Mobile (International): [REDACTED]  
Email: [dholmberg@ofda.gov](mailto:dholmberg@ofda.gov) / [dholmberg@usaid.gov](mailto:dholmberg@usaid.gov)

---

**From:** Wilkes, Joseph [<mailto:JWilkes@ofda.gov>]  
**Sent:** Wednesday, January 21, 2015 12:57 AM  
**To:** Cohen, Harold (AGC/DCHA-BFS) [USAID]  
**Cc:** Clark, Michael A. (M/OAA/DCHA) [USAID]; Siganda,Carolyn [USAID]; Channell, Kasey (DCHA/OFDA) [USAID]; Daniel Holmberg  
**Subject:** RE: World Vision Call re: ISRA and OFAC

All,

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Michael, please add topics I may have overlooked or need further clarification. We should be hearing more from World Vision on this matter tomorrow or Thursday.

Please let me know if you have any questions or concerns. I am available at your convenience.

Best regards,

**Jay Wilkes**

Disaster Operations Specialist  
East and Central Africa (ECA)  
USAID/DCHA/OFDA  
(202) 661-9372  
[jjwilkes@usaid.gov](mailto:jjwilkes@usaid.gov)

**From:** Michael Clark [<mailto:mclark@usaid.gov>]  
**Sent:** Friday, January 16, 2015 4:32 PM  
**To:** Wilkes, Joseph  
**Subject:** Re: World Vision Call re: ISRA and OFAC

Hi Jay,

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Mike

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Are you available to have a conversation with WV on this next Tuesday afternoon? Let me know and I will set up a conference call for all parties. Kasey, Carlyne and Hal, you are welcome to join as well.

JW

**Jay Wilkes**



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--

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Email: [mclark@usaid.gov](mailto:mclark@usaid.gov)



**USAID**  
FROM THE AMERICAN PEOPLE

December 31, 2013

Mr. Debebe Dawit  
Program Management Officer  
World Vision, Inc.  
300 I Street, NE  
Washington, DC 20002

Reference: Project proposal titled *Blue Nile State Recovery Program*

Dear Mr. Dawit:

Thank you for your submission of the proposal referenced above, submitted on December 5, 2013. During the review of the proposal, several issues were raised about which we would appreciate clarification and/or additional information. USAID's Office of U.S. Foreign Disaster Assistance (OFDA) requires a response in full to each of the issues in this letter in a cover letter, as well as incorporating the changes within a new, revised proposal before a final review and decision on your proposal can be made. The revised proposal, **with changes in bold print**, should be submitted to me at OFDA/Washington, no later than January 8, 2014. OFDA requests that you respond to the following issues:

(b)(4)

**General and Budget**

1. Please provide a justification for the  charge for one bicycle under line item "Bicycles for CAHWs."
2. The budget narrative does not include an explanation for line item "Transport of supplies." Please include a description for this line item as well.
3. Please specify the number of days of each training session and the number of participants per training for the hand pump mechanics training.
4. Please provide a more detailed explanation and cost breakdown, including cost of materials, labor/wages, number of trainings or workshops, number of participants and other costs as applicable, for each of the following line items:
  - a. Hygiene promotion campaigns (IEC materials & Community Sessions);
  - b. Community sanitation promotion sessions through CLTS;
  - c. CAHW training
5. In the budget narrative, please provide further explanation on how the cost for "Audit fee/cost/bank charges" was calculated. If possible, please also provide a breakdown of the costs that fall under it.
6. World Vision notes that it will work with local non-governmental organization Islamic Relief Agency (ISRA). Please consult page 50 of the *2012 OFDA Guidelines for Proposals* to ensure that all requirements of a sub-awardee are included in the proposal, including if ISRA has a DUNS number, and supporting documents. The proposal guidelines can be found at: <http://www.usaid.gov/what-we-do/working-crises-and-conflict/crisis-response/resources/guidelines-proposals>.

**Agriculture and Food Security**

7. Please note that the box for agricultural commodities must be checked even if vouchers are being used.
8. It is not clear how seed need has been assessed for the targeted beneficiaries of the seed fairs. Vulnerability does not necessarily mean that farmers do not have access to seed. Please clarify how the farmers would normally access seed and how this has been disrupted.
9. World Vision notes that it will provide IPM training in collaboration with the Ministries for Agriculture and Animal Resource and the Agricultural Research Center. Please describe the types of pests/diseases the proposed training intends to address and the indicators that will be used to measure impacts of the training.

**World Vision International**

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**VIA OFAC ONLINE PORTAL**

**And via email to: <[OFACLicensing@treasury.gov](mailto:OFACLicensing@treasury.gov)>**

February 19, 2015

Davin J. Blackborow  
Assistant Director for Licensing  
Office of Foreign Assets Control  
U.S. Department of the Treasury, Treasury Annex  
1500 Pennsylvania Avenue, NW  
Washington, DC 20220

**RE: Sudan – Case No. SU-2014-314462-1: urgent request for license to pay amounts contractually owed under USAID grant; failure to pay may jeopardize World Vision’s ability to operate in Sudan**

Dear Mr. Blackborow:

Thank you for your response letter dated January 23, 2015, stating that the Islamic Relief Agency (IRA) in Khartoum, Sudan, "appears to be the same entity" as is listed on OFAC's SDN list. We appreciated the opportunity to discuss this matter further with you in our telephone conversation of February 18, 2015.

As discussed in our conversation, although we are surprised by the conclusion in your January 23 letter (particularly given the US Government’s prior knowledge of our engagement with IRA), we understand our blocked party compliance obligations and take them seriously. We will refrain from further transactions with IRA, unless and until satisfactory information is obtained showing that they are not in fact the party on the SDN list.

However, we respectfully request an urgent license to pay IRA approximately US\$125,000 in costs that IRA has already incurred, in having successfully performed a subgrant funded by the US Agency for International Development, and also another subgrant funded by Irish Aid. These are legitimate contractual debts owed by World Vision, and the failure to pay them could have severe repercussions for our extensive humanitarian program in Sudan, potentially up to expulsion from the country. We believe a license under these circumstances, as explained more fully below, is in the interests of the US Government in meeting urgent humanitarian needs in Sudan. A license also would be consistent with OFAC’s Guidance Related to the Provision of Humanitarian Assistance by Not-for-Profit Non-Governmental Organizations dated October 17, 2014.

Under the two subgrants at issue, IRA performed the humanitarian activities required, accomplishing the program goals shared by the ultimate donors (including USAID), and thereby incurred appropriate and legitimate allowable costs (staff salaries, materials, travel, etc.). Per the terms of the subgrant agreements signed between WV and IRA, WV is committed to reimbursing those costs. The amounts that WV owes IRA are approximately \$115,000 under the USAID grant, and approximately \$9,000 under the Irish Aid grant.

We have been in conversations with USAID about this matter since submitting our inquiry to OFAC. In those discussions USAID has essentially deferred to OFAC's position. Following OFAC's January 23 letter, USAID issued WV a letter dated February 5, stating that in light of OFAC's determination, WV must confirm that it "will not engage in any further transactions with [IRA]," and further stating that "costs related to activities undertaken by [IRA] are unallowable and . . . will not be reimbursed by USAID." A license from OFAC to pay the contractual debt will allow us to seek reimbursement from USAID.

The amounts owed to IRA are debts which WV contractually is obligated to pay, and which are now overdue. Failure to pay these debts exposes WV to potential legal liability for breach of contract. Moreover, a failure to reimburse IRA jeopardizes WV's ability to continue operating in Sudan. The Government of Sudan is taking a keen interest in this matter and has advised us that it is quite important that we reimburse IRA for their legitimate already-incurred expenses. Our operations recently have been subject to unusual bureaucratic harassment, which we believe is tied to our delays in reimbursing IRA. An inability to make these reimbursements soon is likely to escalate the matter, potentially up to expelling WV from Sudan. This would impact not only another \$2.7 million USAID grant which WV currently is implementing in the Darfur region, but also the entirety of WV's humanitarian operations in Sudan. Such operations have a current annual budget of \$49 million, providing approximately 1.5 million internally displaced persons with much needed food, water, medical assistance, sanitation, and food security and livelihood assistance. WV's expulsion from Sudan would harm not just WV, but also the people of Sudan, and the US Government's interests in providing effective and accountable humanitarian assistance to such people.

We would respectfully point out that we have relied on the actions of two US Government agencies, OFAC and USAID, both of which previously were informed explicitly in writing that we were using IRA as an implementing partner in Sudan, and neither of which raised any concern about that information (as detailed in our November 19, 2014 letter). Acting on such reliance, we have engaged IRA to perform humanitarian activities that were, and presumably continue to be, in the interests of the US Government, and which were to be paid for by the US Government (for the USAID grant). While we can, with some difficulty, extract ourselves from any further activity with IRA, the repercussions for WV not paying our contractual debts for already-performed humanitarian assistance could be severe. We respectfully suggest that both WV and the US Government share an interest in resolving this situation, and doing so in a manner which allows WV to sever our relationship with IRA without jeopardizing WV's entire humanitarian program in Sudan.

We therefore urgently request a license to permit WV to meet our contractual obligations and to reimburse IRA for approximately \$125,000 in grant performance costs already incurred.

## Jeffrey, Flis

---

**From:** Wilkes, Joseph  
**Sent:** Thursday, November 20, 2014 3:39 PM  
**To:** Holmberg, Daniel  
**Subject:** RE: Potential Terrorism Ties: WV's Subgrantee Under AID-OFDA-G-14-00023 in Sudan

No!

---

**From:** Holmberg, Daniel  
**Sent:** Thursday, November 20, 2014 2:17 PM  
**To:** Wilkes, Joseph  
**Subject:** Fwd: Potential Terrorism Ties: WV's Subgrantee Under AID-OFDA-G-14-00023 in Sudan

Jay am I having déjà vu or did we already deal with this organization and issue of islamic relief agency in an (b)(6) Grant?

Sent from my iPhone

Begin forwarded message:

**From:** Tyler Posey <[tposey@usaid.gov](mailto:tposey@usaid.gov)>  
**Date:** November 20, 2014 at 10:06:44 PM GMT+3  
**To:** "Wilkes, Joseph" <[JWilkes@ofda.gov](mailto:JWilkes@ofda.gov)>  
**Cc:** "Channell, Kasey (DCHA/OFDA) [USAID]" <[kchannell@usaid.gov](mailto:kchannell@usaid.gov)>, "Chan, Carol (DCHA/OFDA) [USAID]" <[cchan@usaid.gov](mailto:cchan@usaid.gov)>, "Konyndyk, Jeremy" <[jkonyndyk@ofda.gov](mailto:jkonyndyk@ofda.gov)>, "Christie, Cara (DCHA/OFDA) [USAID]" <[cchristie@usaid.gov](mailto:cchristie@usaid.gov)>, Daniel Holmberg <[dholmberg@usaid.gov](mailto:dholmberg@usaid.gov)>, "Wanjue, Charles [USAID]" <[cwanjue@usaid.gov](mailto:cwanjue@usaid.gov)>, "Aronson, Scott L. [USAID]" <[saronson@usaid.gov](mailto:saronson@usaid.gov)>, Martha Dye <[mdye@usaid.gov](mailto:mdye@usaid.gov)>  
**Subject:** **Re: Potential Terrorism Ties: WV's Subgrantee Under AID-OFDA-G-14-00023 in Sudan**

(b)(5) - Attorney-Client Privilege;(b)(5) - Deliberative Process Privilege

----- Forwarded message -----

From: [redacted] (b)(4);(b)(6)

Date: Tue, Sep 9, 2014 at 6:49 PM

Subject: Approval Request for Blue Nile State Recovery Program Activity Relocation

To: Charles Wanjue <cwanjue@usaid.gov>

Cc: [redacted] (b)(6), [redacted] (b)(4);(b)(6)

[redacted] (b)(4);(b)(6)

Dear Charles,

World Vision is implementing a one year program titled 'Blue Nile State Recovery Program' to address the needs of IDPs and host communities. The Agreement Number of the Program is AID - OFDA - G - 14 - 00023, and it runs from 1 February 2014 to 30 January 2015. The major components of the Program are Agriculture/Food Security and WASH. The intervention areas of the Program are Geissan and Bau localities in Blue Nile State.

Overall, the implementation of the Program is progressing quite well, and the status of budget spending as at end of July 2014 is 46%. The general security situation in the Program area is at acceptable risk level, and World Vision hopes to finish implementation within the planned timeline. However, there is a deterioration in the security situation in some villages mainly because of clashes between Government forces and armed rebel groups. One such case is Abu Gumaie village in Geissan locality where because of recent clashes between rebels and the Government forces, World Vision has found it too risky to implement the construction of a school latrine at Abu Gumaie Basic School. World Vision and its partner NGO ISRA (Islamic Relief Agency) in consultation with the local community have found out that there is a similar need at Abu Shaniena Basic School in the same locality. The relocation of the activity will not lead to increase in the budget of the sub-component latrine construction.

As has been done in the case of other school latrine construction, World Vision will undertake hygiene promotion activities to complement the construction of the latrine. The school leadership will be sensitized on sustainability issues. Thus, Parents and Teachers Association (PTA) of the school will be trained on the the importance of hygiene and sanitation. The PTA will facilitate health club formation in the school which will be working on behavior change activities through drama and hygiene promotion sessions within their communities. The club will make sure that the latrine to be constructed will be regularly cleaned and appropriately managed. Hand washing and drinking water facilities will be provided to the school to promote hand washing and safe water storage for pupils.

This is therefore to request for your approval to shift the construction of the latrine from Abu Gumaie Basic School to Abu Shaniena Basic School.

Best regards.

[redacted] (b)(4);(b)(6)

World Vision Sudan | www.wvi.org

Tel - Office: [redacted] (b)(6) | Mobile: [redacted] (b)(6)  
Email: [redacted] (b)(6) | Skype: [redacted] (b)(6)

Our vision for every child, life in all its fullness; Our prayer for every heart, the will to make it so.

## USAID

---

**From:** Channell, Kasey (DCHA/OFDA) [USAID]  
**Sent:** Thursday, January 15, 2015 6:07 PM  
**To:** Clark, Michael A. (M/OAA/DCHA) [USAID]  
**Cc:** Cohen, Harold (AGC/DCHA-BFS) [USAID]; Wilkes, Joseph (DCHA/OFDA) [USAID]; Siganda,Carolyn [USAID]  
**Subject:** Re: World Vision - Sudan IG Notification

Thanks Hal. Changes made and clarification on funds disbursed (great news added). Sending to IG now.

Kasey Channell  
Africa Division Chief  
Office of U.S Foreign Disaster Assistance  
USAID/DCHA/OFDA

202-712-4167  
[kchannell@usaid.gov](mailto:kchannell@usaid.gov)

On Thu, Jan 15, 2015 at 9:21 AM, Kasey Channell <[kchannell@usaid.gov](mailto:kchannell@usaid.gov)> wrote:  
Thanks Mike. We will get Hal's edits made and send this to IG today with a copy to all.

Sent from my iPhone

On Jan 15, 2015, at 9:19 AM, Michael Clark <[mclark@usaid.gov](mailto:mclark@usaid.gov)> wrote:

As a follow up to the notification discussion, with the understanding the OIG will be notified by OFDA, OAA, Compliance Division, does not intend to separately notify OIG.

Thanks,  
Mike

On Thu, Jan 15, 2015 at 8:46 AM, Harold Cohen <[hcohen@usaid.gov](mailto:hcohen@usaid.gov)> wrote:  
See my suggested edits.

Hal

Harold L. Cohen  
Assistant General Counsel  
Bureau for Democracy, Conflict and Humanitarian Assistance &  
Bureau for Food Security  
U.S. Agency for International Development  
Office of the General Counsel  
1300 Pennsylvania Avenue, N.W.  
Washington, D.C. 20523



**COVER PAGE**

**WORLD VISION, INC.**

**Program Title: Blue Nile Integrated Recovery Project (AID-OFDA-G-14-00023)**

Original Award Start Date: 1 February 2014  
Original Award End Date: 30 April 2015  
Proposed Extension Duration: 12 Months

Submission/Revision Date: March 26, 2015  
Proposed Start Date: May 1, 2015

Dollar Amount Requested from OFDA: \$ 499,999  
Dollar Amount from Other Sources: \$ 36,768  
Dollar Value of In-Kind Contributions: \$ 0  
Total Dollar Amount of Program: \$ 536,767

(b)(4);(b)(6)

**Headquarters Contact (WVUS)**

Debebe Dawit  
Program Management Officer  
300 I Street, NE  
Washington, DC20002  
Tel: 202.572.6549  
Fax: 202.572.6480  
Email: [ddawit@worldvision.org](mailto:ddawit@worldvision.org)

**Field Contact**

[Redacted]  
Tel: (b)(6)  
Fax: (b)(6)  
Email: (b)(6)

(b)(4);(b)(6)

**Legal Contact**

Grace Murphy  
Associate General Counsel  
300 I Street NE  
Washington, DC 20002  
Tel: 202.572.6352  
Fax: 202.572.6480  
[atodhunt@worldvision.org](mailto:atodhunt@worldvision.org)

[Redacted]  
Tel: (b)(6)  
Fax: (b)(6)

(b)(4)

**TIN: 95-1922279**

**DUNS: 07-190-3322**

**LOC:** [Redacted]

World Vision, Inc. is a non-profit, tax-exempt corporation, classified under section 501(c)(3) of the Internal Revenue Code. It is organized under the laws of the State of California, with headquarters located in Federal Way, Washington. World Vision has over thirty-five years of experience in accessing and implementing US Government, State, and local public sector financial assistance awards. The United States Agency for International Development is the cognizant Federal agency for World Vision, Inc. in regard to the required annual A133 audit and the US Government Negotiated Indirect Cost Rate Agreement (NICRA). World Vision has been a registered PVO with USAID since September 30, 1977.



World Vision is a Christian humanitarian organization dedicated to working with children, families, and their communities worldwide to reach their full potential by tackling the causes of poverty and injustice.

**From:** Wilkes, Joseph [mailto:JWilkes@ofda.gov]

**Sent:** Wednesday, January 20, 2016 10:07 AM

**To:** Alyssa Todhunter - US <atodhunt@WorldVision.org>; Christie, Cara (DCHA/OFDA) [USAID] <cchristie@USAID.GOV>

**Cc:** Reed, Renee (M/OAA/DCHA) [USAID] <RReed@USAID.GOV>; Debebe Dawit - US <ddawit@WorldVision.org>; Sylvia Mallet-Beke - US <smalletb@WorldVision.org>; (b)(4);(b)(6) /NSDO/WorldVision <(b)(4);(b)(6)>; (b)(4);(b)(6)

(b)(4);(b)(6) NSDO/WorldVision <(b)(4);(b)(6)>

(b)(4);(b)(6) NSDO/WorldVision <(b)(4);(b)(6)>

**Subject:** RE: Request for Change of Location under AID-OFDA-G-14-00023

Hi Alyssa,

Thanks for the notification. Based on the award language, no modification to the award is required.

Best regards,

**Jay Wilkes**

*Senior Disaster Operations Specialist*

U.S. Agency for International Development (USAID)

Office of U.S. Foreign Disaster Assistance (OFDA)

Cell: (b)(6)

Office: (202) 661-9372

[jwilkes@ofda.gov](mailto:jwilkes@ofda.gov)

**From:** Alyssa Todhunter - US [mailto:atodhunt@WorldVision.org]

**Sent:** Friday, January 15, 2016 1:45 PM

**To:** Wilkes, Joseph (DCHA/OFDA) [USAID]; Christie, Cara (DCHA/OFDA) [USAID]

**Cc:** Reed, Renee (M/OAA/DCHA) [USAID]; Debebe Dawit - US; Sylvia Mallet-Beke - US; (b)(4);(b)(6) /NSDO/WorldVision; (b)(4);(b)(6) /NSDO/WorldVision; (b)(4);(b)(6) /NSDO/WorldVision; (b)(4);(b)(6)

(b)(4);(b)(6) NSDO/WorldVision

**Subject:** Request for Change of Location under AID-OFDA-G-14-00023

Greetings,

According to the project proposal for the above referenced grant agreement, the target project sites included 4 villages located in Blue Nile State, Bau locality, which are Maganza, Masfa, Abugarin, and Dering. At the time of the proposal development, the villages were safe and quite accessible. As you are award, conflicts began to take place in the villages some months ago between government forces and armed elements. These conflicts were on and off initially, but recently the situation has been consistently unstable and about 67% of the people living in the target villages have been evacuated to other safer areas in localities called Rosaires and Demazin.

The first two villages (Maganza and Masfa) are said to be completely deserted, while the other two (Abugarin and Dering) are partially so, but continue to be very unsafe to access as moving on the main road linking these two areas with Damazin (the capital of the State) is risky. WV was observing the situation for some time hoping for restoration of calmness. However, local sources indicate that there will be little possibility of improvement in the situation and therefore, the displaced people will not be returning to the four villages in the near future.

Thus, after comprehensive consultations with local authorities, Ministry of Health, and the local NGO subgrantee Pan Care, WV has reached a conclusion that it will not be feasible to implement the activities of the project in the originally targeted villages. Through the same consultation, we have identified four new areas into which we need to relocate the activities of the project, which include: Al Gerri, El Azaza, and Agraa in Rosaires locality and Alseragia in Demazine locality (see the table below).

S/N	New Villages	New Locality (in which the project beneficiaries moved)	Original population in the new villages	Relocated population
-----	--------------	---------------------------------------------------------	-----------------------------------------	----------------------

1	Al Gerri	Rosaires	1,005	5,483
2	El Azaza	Rosaires	5,575	4,200
3	Agraa	Rosaires	3,654	255
4	Alseragia	Damazin	4,330	600
	<b>Total</b>		14,564	10,538

The displaced project beneficiaries will benefit from the implementation of the same project activities in the new locations. All the planned project activities will remain the same.

Therefore, WV respectfully requests approval from OFDA to relocate the project activities to the proposed new locations – for WASH, as well health components.

If you have any questions or need any additional information, please do not hesitate to ask.

Sincerely,

**Alyssa Todhunter**

Director, Grant and Contract Services | Contract Services/Legal  
 Phone 253.815.2280 | Cell (b)(6) | Fax 253.815.3444 | [atodhunt@worldvision.org](mailto:atodhunt@worldvision.org)  
 Mail Stop 657 | PO Box 9716 | Federal Way, WA 98063-9716 USA

World Vision | Building a better world for children | [www.worldvision.org](http://www.worldvision.org) | Skype: alyssa.todhunter

World Vision is a Christian humanitarian organization dedicated to working with children, families, and their communities worldwide to reach their full potential by tackling the causes of poverty and injustice.

This transmission is intended for the sole use of the individual and entity to whom it is addressed, and may contain information that is confidential and may not be disclosed under applicable law. You are hereby notified that any dissemination, distribution, or duplication of this transmission by someone other than the intended addressee or its designated agent is strictly prohibited. Thank you.

This transmission is intended for the sole use of the individual and entity to whom it is addressed, and may contain information that is confidential and may not be disclosed under applicable law. You are hereby notified that any dissemination, distribution, or duplication of this transmission by someone other than the intended addressee or its designated agent is strictly prohibited. Thank you.

## USAID

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**From:** Wilkes, Joseph  
**Sent:** Monday, March 30, 2015 9:43 AM  
**To:** 'Drew Clark - US'  
**Cc:** 'Debebe Dawit - US'; Channell, Kasey (DCHA/OFDA) [USAID]; Christie, Cara (DCHA/OFDA) [USAID]  
**Subject:** RE: WV Cost Modification to Blue Nile, Sudan project

Hi Drew,

Thank you. Acknowledging receipt.

**Jay Wilkes**

Disaster Operations Specialist  
East and Central Africa (ECA)  
USAID/DCHA/OFDA  
(202) 661-9372  
[jjwilkes@usaid.gov](mailto:jjwilkes@usaid.gov)

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**From:** Drew Clark - US [mailto:dclark@worldvision.org]  
**Sent:** Thursday, March 26, 2015 6:51 PM  
**To:** Wilkes, Joseph  
**Cc:** Debebe Dawit - US  
**Subject:** RE: WV Cost Modification to Blue Nile, Sudan project

Jay, I wanted to offer a couple of additional comments, but direct them to just you at the HQ level, not for forwarding.

Obviously, these are challenging circumstances for project implementation in Blue Nile, and there are very high sensitivities at the field level. HAC has been slow to approve our proposed new partner, who we hope will not only finish the existing subgrant, but also serve as subgrantee for the new project. (Thus, you'll notice that our current pipeline shows an anticipated balance at the end of the current NCE, which we hope to roll over into the modification.) WV's relations with the GoS are quite delicate at the moment, due to the fallout from terminating ISRA, so this negotiation has to proceed carefully.

As difficult as this situation has been, WV remains committed to serving in Blue Nile for as long as we have clearance. The humanitarian need is massive and there are very few aid agencies who can access these conflict-affected people. And, despite the challenges, we continue to hear from OFDA/Khartoum team that we should keep planning for the next phase of the project. So we're doing so, trusting that some of the administrative hurdles will fall away in the weeks ahead.

If OFDA sends an issues letter for this submission, can I suggest that the most sensitive issues be addressed in a second, parallel communication, whether by phone or by email directly to me? Our Sudan office is concerned that email traffic can be compromised, and I think it will make them more comfortable if that conversation is kept separate. Sensitive topics would be the obvious ones, such as issues relating to the suspension of ISRA and how that is being resolved, and comments regarding WV's relationship with HAC and the GoS, and how that might impact partner selection for the next phase.

USAID

(b)(6)

**From:** Charles Wanjue <cwanjue@usaid.gov>  
**Sent:** Sunday, February 22, 2015 9:10 AM  
**To:** [REDACTED] [USAID]  
**Cc:** Daniel Holmberg; Wilkes, Joseph (DCHA/OFDA) [USAID]; Platt, Georgianna (OFDA/ECARO) [USAID]; LIM AH KEN Lisa; Meserve, Lawrence (SUDAN/MD) [USAID]  
**Subject:** Re: World Vision in the Local Media

**Follow Up Flag:** Follow up  
**Status:** Completed

(b)(6)

Thank you [REDACTED] for the analysis.

Well noted

Regards,

(b)(6)

**Charles Wanjue**  
Senior Program Officer  
Office of U.S. Foreign Disaster Assistance (OFDA)  
U.S. Agency for International Development (USAID)  
Khartoum, Sudan  
**Mobile:** [REDACTED]  
**Office:** +249 187022239  
**Voip:** 202 216 6236  
**Email:** cwanjue@usaid.gov

(b)(6)

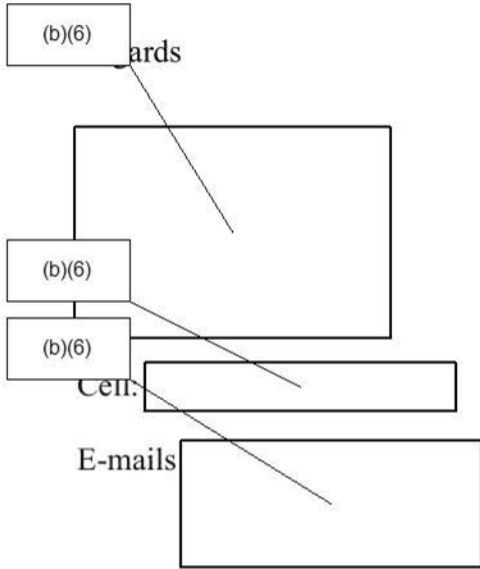
On Sun, Feb 22, 2015 at 1:02 PM, [REDACTED] wrote:  
Charles;

This came on the first page of the pro-government - daily Intibaha today. The summary of the small article is about a memo from the local community and political leaders to the state level HAC of Blue Nile state requesting the expulsion of WV from the state. The memo made reference to some internal WV communications between WV state level office and the country office.

The article mentioned that the community leaders memo described the WV communications as hostile to Sudan as they cover issues such as the security situation in the state, the movement and operations of SAF; the explosion of the SAF ammunition warehouse in Damazin, progress in the two areas negotiations and preparations for elections.

The memo requested the authorities to investigate these issues with WV in addition to other issues raised earlier against the same organization in Darfur such as: the involvement of WV in evangelism and distribution of the bible in Darfur in addition to organizing a meeting in Deraig IDP with rebel supporters.

My personal take on this; it might be linked with the case of ISRA (Islamic Relief Agency) which is the national partner of WV in the state and has been suspended due to their being in the OFAC terrorist list. ISRA is well connected with the government and might be playing this to put pressure on WV or punish them, they might have felt that this was influenced by WV or they didn't do enough to protect them.





**USAID**  
FROM THE AMERICAN PEOPLE

June 16, 2016

Alyssa Todhunter  
World Vision International  
34834 Weyerhaeuser Way South  
Federal Way, WA 98001  
United States

**Subject:** Acknowledgement of "No-Cost" Extension of Award No. AID-OFDA-G-14-00023-02

Dear Alyssa Todhunter:

This is to acknowledge your intent to extend the subject award for up to three months under the authority of Section 1.2 of the awards. This "no-cost" extension extends the subject award's end date, from June 30, 2016 to September 30, 2016.

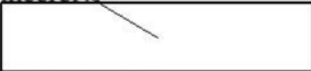
I hereby acknowledge such extension subject to the explicit understanding that:

1. The purpose of the extension is not solely to expend unobligated balances;
2. The terms and conditions of the award permit the extension;
3. No additional U.S. Government funds are required; and
4. The extension does not involve a change in the approved scope or objectives of the project.

Please be sure to attach a copy of this letter to all financial reports which include costs incurred after the estimated completion date set forth in the award (as it may have been amended) but within the period of such "no-cost" extension.

(b)(6) Should you have any questions about this extension, please contact me at 202-712-1709.

Sincerely,

  
Joseph Wilkes  
Agreement Officer's Representative

cc:  
Regional Advisor  
Regional Coordinator  
DCHA/OFDA/PS Grants Unit  
M/FM/Electronic Copy (ci@usaid.gov)

USAID's Office of U.S. Foreign Disaster Assistance (OFDA) would like to notify OFAC of an issue regarding USAID/OFDA award # AID-OFDA-14-00023 with World Vision (WV) in Sudan. During implementation of the award, OFDA became aware that one of the sub-awardees, Islamic Relief Agency (ISRA) approved in the award was on the Specially Designated National (SDN) list. Payments were made by World Vision under the USAID/OFDA award to ISRA; however, WV has confirmed that USAID has not reimbursed WV for payments made to ISRA.

The specific details of this incident are as follows:

- 3/14/2014 – The USAID Agreement Officer signed the subject award with WV, including the use of ISRA as a sub awardee.
- 7/1/2014 – OFDA entered into discussions with (b)(6) about a separate award, under which (b)(6) was considering using WV and its network of partners as a sub-awardees. During this review, (b)(6) identified the partnership with ISRA as an issue and referred the concern to both WV and OFAC. As it had difficulty determining whether ISRA was the same as that listed on the OFAC list, (b)(6) requested USAID assistance in interacting with OFAC. Through USAID's Office of the General Counsel (GC), USAID received confirmation from OFAC Office of the Chief Counsel that the organizations were one and the same (7/28/14 email). This was communicated by OFDA to (b)(6).
- 11/20/2014 – WV requested confirmation from OFAC as to the status of ISRA and requested verification that they were the same organization listed on the SDN list.
- 1/13/2015 – Following up on the WV inquiry, USAID GC received informal, verbal confirmation from OFAC Licensing that ISRA is the same organization listed on the SDN list.
- 1/26/2015 – USAID received confirmation from WV that they had been contacted by OFAC, which confirmed that ISRA is the same organization included on OFAC's Specially Designated Nationals and Blocked Persons List as a Specially Designated Global Terrorist. Furthermore, WV indicated OFAC denied WV's request for a specific license.

Immediately upon being alerted to this issue on January 13, 2014, OFDA has taken the follow steps to address the situation:

- Ensured further payments are not made to WV which may be used to support the activities conducted by ISRA.
- Began working with the Agreement Officer to request more detailed accounting of reimbursements made to date to determine what, if any, funds disbursed might be at issue.
- Initiated a review of OFDA's award processing procedures to ensure sub-recipients are checked against OFAC's SDN list.
- Requested a review of OFDA sub-awardees across all portfolios to determine if ISRA might have been a sub-awardee under additional mechanisms.

If you have any additional questions or concerns, please contact me at your convenience.

Kasey Channell  
Africa Division Director

Office of U.S Foreign Disaster Assistance  
USAID/DCHA/OFDA

202-712-4167  
kchannell@usaid.gov



## USAID

---

**From:** Wilkes, Joseph  
**Sent:** Monday, April 27, 2015 5:09 PM  
**To:** Mbasu, Matthew  
**Cc:** Tyler, Casey  
**Subject:** Fwd: WV Cost Modification to Blue Nile, Sudan project  
**Attachments:** Attachment 1 Detailed Budget and Pipeline.xlsx; ATT00001.htm; Attachment 2 Cost Proposal, Budget Narrative, Branding and Marking, and NICRA.docx; ATT00002.htm; Attachment 3 Signed SF-424.pdf; ATT00003.htm; Attachment 4 Signed Certs and Reps.pdf; ATT00004.htm; Attachment 5 Past Performance.docx; ATT00005.htm; Attachment 6 - Blue Nile Security Plan.pdf; ATT00006.htm; Attachment 7 - Code of Conduct with Localizing Paragraph.docx; ATT00007.htm; Attachment 8 WASH Indicators.docx; ATT00008.htm; Attachment 9 - PanCare profile.docx; ATT00009.htm; Blue Nile Proposal 27 April 2015.docx; ATT00010.htm

Hi Matthew and Casey,

At your convenience tomorrow, would you please review this to ensure the minimum requirements are met?  
Thanks,  
JW

Begin forwarded message:

**From:** "Drew Clark - US" <dclark@worldvision.org>  
**To:** "Wilkes, Joseph" <JWilkes@ofda.gov>, "Wanjue, Charles [USAID]" <cwanjue@usaid.gov>, (b)(6) SUDAN/IDP [USAID]" (b)(6) (b)(6) [USAID]" (b)(6)  
**Cc:** "Alyssa Todhunter - US" <atodhunt@WorldVision.org>, "Sylvia Mallet-Beke - US" <smalletb@WorldVision.org>, "Debebe Dawit - US" <ddawit@WorldVision.org>, (b)(4);(b)(6) (b)(4);(b)(6) - US" (b)(4);(b)(6), (b)(4);(b)(6) - US" (b)(4);(b)(6), (b)(4);(b)(6) - US" (b)(4);(b)(6)  
**Subject:** RE: WV Cost Modification to Blue Nile, Sudan project

Dear Jay,

After further feedback and discussion from Charles and team, please find attached WV's revised proposal documents for a cost modification in Blue Nile, Sudan.

Our submission today consists of the main proposal and nine attachments:

- Main Proposal – 27 April
- Attachment 1: Detailed Budget
- Attachment 2: Cost Proposal, Narrative, Branding Strategy and Marking Plan, and NICRA letter
- Attachment 3: Signed SF-424
- Attachment 4: Signed Certifications
- Attachment 5: Past Performance
- Attachment 6: Safety and Security Plan
- Attachment 7: Code of Conduct with localizing paragraph
- Attachment 8: WASH Indicators
- Attachment 9: PanCare profile

Thank you for your patience, and please let us know if you have any questions.

Drew Clark

---

**From:** Wilkes, Joseph [mailto:JWilkes@ofda.gov]  
**Sent:** Monday, March 30, 2015 6:41 AM  
**To:** Drew Clark - US; Wanjue, Charles [USAID]; (b)(6) (SUDAN/IDP) [USAID];  
(b)(6)  
**Cc:** Alyssa Todhunter - US; Sylvia Mallet-Beke - US; Debebe Dawit - US; Wanjue, Charles [USAID]  
**Subject:** RE: WV Cost Modification to Blue Nile, Sudan project

Hi Drew,

Thanks for your email. Unfortunately, we cannot begin review of this proposal as it has not been reviewed or cleared by our field team in Khartoum. We look forward to reviewing the proposal once it has been cleared.

**Jay Wilkes**

Disaster Operations Specialist  
East and Central Africa (ECA)  
USAID/DCHA/OFDA  
(202) 661-9372  
[jwilkes@usaid.gov](mailto:jwilkes@usaid.gov)

---

**From:** Drew Clark - US [mailto:dclark@worldvision.org]  
**Sent:** Thursday, March 26, 2015 6:29 PM  
**To:** Wilkes, Joseph; Wanjue, Charles [USAID]; (b)(6) (SUDAN/IDP) [USAID];  
(b)(6)  
**Cc:** Alyssa Todhunter - US; Sylvia Mallet-Beke - US; Debebe Dawit - US  
**Subject:** WV Cost Modification to Blue Nile, Sudan project

Dear Jay,

Please find attached WV's proposal for a cost modification to WV's project in Blue Nile, AID-OFDA-G-14-00023.

Our submission today consists of the main proposal and eight attachments:

- Main Proposal
- Attachment 1: Detailed Budget
- Attachment 2: Cost Proposal, Narrative, Branding Strategy and Marking Plan, and NICRA letter
- Attachment 3: Signed SF-424
- Attachment 4: Signed Certifications
- Attachment 5: Past Performance
- Attachment 6: Safety and Security Plan
- Attachment 7: Code of Conduct with localizing paragraph
- Attachment 8: WASH Indicators

Our thanks to the OFDA team in Khartoum for discussions and feedback about the future plans for this project.

This is a follow email regarding the Blue Nile grant Award No. AID-OFDA-G-14-00023 No Cost Extension (NCR) which was submitted on 01/09/2015. As the end date of the grant is Jan 31,2015, it will be good if we can get the approval letter by COB today.

Looking forward to get your response as earliest as possible.

Best Regards

---

**From:** Jill Byrd - US  
**Sent:** Friday, January 09, 2015 3:52 PM  
**To:** [csiganda@ofda.gov](mailto:csiganda@ofda.gov); [saronson@ofda.gov](mailto:saronson@ofda.gov)  
**Cc:** [jwilkes@usaid.gov](mailto:jwilkes@usaid.gov); [cchristie@usaid.gov](mailto:cchristie@usaid.gov); Debebe Dawit - US; Sylvia Mallet-Beke - US; Alyssa Todhunter - US  
**Subject:** Sudan Blue Nile Program #AID-OFDA-G-14-00023: No-Cost Extension  
**Importance:** High

Greetings,

In accordance with Section 1.2(c)(5)(A) of the subject grant agreement, World Vision (WV) seeks your acknowledgement of our intent to extend the grant term for three (3) months. With your acknowledgement, the new estimated completion date will be April 30, 2015, which will allow WV to complete the following activities:

1. World Vision has to look for another local organization to complete the remaining activities of the project if indeed ISRA is confirmed to be a blocked party.
2. Complete Food Security Activities: Completion of vaccination campaign and refresher training of 25 CAHWs.
3. Complete WASH Activities: Completion of one VIP school latrine in Abushanina and Completion of establishing additional school health clubs, and CLTS training.
4. To conduct End of project Evaluation and to produce End of project final report.

This no cost extension is necessary for two reasons:

1. Subgrantee implementation activities had to be put on hold once it came to WV's attention that its sub-grantee, Islamic Relief Agency (ISRA-Khartoum), might possibly be listed as a sanctioned organization by the Office of Foreign Assets Control (OFAC). WV contacted OFAC on November 19<sup>th</sup>, and is currently still waiting for a reply to its request for confirmation as to whether ISRA-Khartoum is indeed a sanctioned organization.
2. There have been frequent security-related challenges, which have caused some delay on project implementation.

This extension does not require additional Federal funds nor does it currently involve changes in the approved objectives or the scope of the project. A pipeline budget analysis has been provided for your information.

If you have any further questions, please feel free to contact me at [atodhunt@worldvision.org](mailto:atodhunt@worldvision.org) or Debebe Dawit at [dwit@worldvision.org](mailto:dwit@worldvision.org).

(b)(6)

Respectfully,



Jill Byrd (on behalf of Alyssa Todhunter)

Jill E. Byrd  
Senior Grant and Contract Officer/Grant and Contract Services/Legal Department/Strategic Solutions

World Vision, Inc. (WVUS)

**Phone:** 253.815.2687 | **Fax:** 253.815.3444 | [jbyrd@worldvision.org](mailto:jbyrd@worldvision.org) | **Skype ID:** jill.byrd  
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**Mailing Address:** PO Box 9716 | MS 657 | Federal Way, WA 98063-9716 USA

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Michael A. Clark  
Division Chief

## USAID

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**From:** Wilkes, Joseph  
**Sent:** Wednesday, January 21, 2015 9:11 AM  
**To:** Channell, Kasey (DCHA/OFDA) [USAID]  
**Cc:** Siganda, Carlyne [USAID] (csiganda@usaid.gov)  
**Subject:** FW: World Vision - urgent clarification needed re Sudanese partner - moving ahead

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

FYI: WV record of events.

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**From:** Mark Smith - US [mailto:masmith@worldvision.org]  
**Sent:** Tuesday, January 20, 2015 6:08 PM  
**To:** Clark, Michael A. (M/OAA/DCHA) [USAID]; Wilkes, Joseph  
**Cc:** Debebe Dawit - US  
**Subject:** FW: World Vision - urgent clarification needed re Sudanese partner - moving ahead

Jay and Michael:

Thank you so much for the conference call on January 20 and the time you and Michael Clark afforded for World Vision, Inc. (WVUS) to provide an update as to its inquiry to OFAC. As we discussed, World Vision has sent a notice to OFAC indicating World Vision's intention to begin transactions with Islamic Relief Agency (IRA) in Khartoum. There was slight miscommunication between my legal counsel and myself regarding the amount of detail that we intend to provide to OFAC. Actually, World Vision provided a very brief notice to OFAC. If OFAC responds with questions, World Vision would then be happy to provide additional information to OFAC. The notice to OFAC is at the bottom of this email.

Since I provided World Vision's thought process in our phone call, I thought it may be helpful for your review to summarize the points here:

1) Genesis of inquiry to OFAC:

- IOM staff member's allegation that IRA may be or may be related to a US-sanctioned entity.
- WV examined the internal screening results (negative) and the OFAC's listing of the Islamic Relief Agency in Missouri (ISRA) that is listed as a blocked party. Since the review wasn't sufficiently clear and WV appreciates the importance of complying with sanctions, WV thought it best, out of an abundance of caution, to clarify IRA (Khartoum)'s status with OFAC.
- Hence, the submission of what we thought would be a simple inquiry to OFAC on November 19<sup>th</sup>.
- Hence, also, the notice to OFDA, and WV's notice to IRA of the matter and the stopping of payments to IRA.

2) Almost complete silence from OFAC for 2 months except for an email on the 29<sup>th</sup> of December asking WV if there is any additional or new information.

3) Indicators that OFAC has no information to support a sanction against IRA:

- OFAC approved WVI and WVUS's licensing renewal application for the Sudanese country sanctions in 2014. The license application listed IRA as WV's only subgrantee. OFAC did not raise an issue at that time.
- State's preliminary assessment based on what OFAC has shared with State, is that there is no issue with IRA. State has cautioned that WV should not rely on State's preliminary assessment because OFAC may have information that it has not yet shared with State.

- State contact believes, from her conversations with OFAC officials, that OFAC is only concerned about IRA because WV raised the question.

- It is unclear whether the (b)(6) staff who raised the issue earlier was speaking from personal opinion or in their capacity as an (b)(6) representative; this staff member has since left (b)(6), (b)(6) current management indicates it does not have an issue with IRA. And (b)(6) has a robust historical and current relationship with IRA; IRA's strong reputation as a local aid NGO.

4) Given that two months have gone by with almost no contact from OFAC, and despite efforts by our State contacts, White House contacts, and a Congressman, OFAC has shown no signs that it will respond to WV's inquiry in the near future.

5) While recognizing that OFAC may not give strong weight to the programmatic impact of its sanctions programs, World Vision is keenly aware of the impact to the Sudanese communities due to IRA's stopped work. IRA has performed excellent work under the OFDA award and the other funding streams that WV utilizes. Moreover, putting contractual relationships in limbo for such a long period is putting a significant strain on WV's relationships within Sudan, especially the Sudanese government.

6) Given that WV has no information to substantiate any issue with IRA, other than the ambiguity of the relationships between Islamic Relief Agencies and OFAC's silence, WV has submitted a notice to OFAC indicating WV's intention to restart work with IRA and to transact with IRA. WV plans to give OFAC one week to react, and then will move forward with IRA.

At least some of the work being performed in Sudan through World Vision and IRA is funded by OFDA, and so we will be eager to hear from OFDA before the one week time frame as well to clarify World Vision's way forward.

If you have any questions, don't hesitate to ask.

Sincerely,

(b)(6) k

Mark C. Smith | Senior Director, Humanitarian and Emergency Affairs | World Vision | 300 I St. NE | Washington D.C., 20002 | Office: +1.202.572.6510 | Mobile: (b)(6) | Skype: markcsmith1958 | [masmith@worldvision.org](mailto:masmith@worldvision.org) |

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**From:** [Tim\\_Burgett@wvi.org](mailto:Tim_Burgett@wvi.org) [mailto:Tim\_Burgett@wvi.org]

**Sent:** Tuesday, January 20, 2015 4:26 PM

**To:** [Aydin.Akgun@treasury.gov](mailto:Aydin.Akgun@treasury.gov)

**Cc:** [Andrew.Sens@treasury.gov](mailto:Andrew.Sens@treasury.gov); Matthew Harvey/WVIO/WorldVision; Steve Mcfarland - US

**Subject:** Fw: World Vision - urgent clarification needed re Sudanese partner - moving ahead

Dear Mr. Akgun,

It has been 2 months since we submitted a fairly straightforward question: is the Islamic Relief Agency in Sudan a party on the Specially Designated Nationals list? Since OFAC has been unable to give an answer within a reasonable time frame, it seems clear that OFAC does not in fact have information to confirm that IRA is the same entity which is named on the SDN list.

Accordingly, we intend to resume our partnership with IRA to meet urgent humanitarian needs for the people of Sudan. We will resume these transactions one week from today, unless we have received from OFAC a confirmation that IRA is an SDN.

Sincerely,

\*\*\*\*\*  
Tim Burgett  
General Counsel, Chief Legal Officer  
World Vision International  
Monrovia, California, USA  
Telephone: +1-626-305-7890  
E-mail: [tim\\_burgett@wvi.org](mailto:tim_burgett@wvi.org)

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