

SIGAR

**Special Inspector General for
Afghanistan Reconstruction**

SIGAR 22-35-IP Evaluation Report

FINAL REPORT

Theft of Funds from Afghanistan: An Assessment
of Allegations Concerning President Ghani and
Former Senior Afghan Officials



AUGUST
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SIGAR

Office of the Special Inspector General
for Afghanistan Reconstruction

August 9, 2022

The Honorable Nancy Pelosi
Speaker
U.S. House of Representatives

The Honorable Charles E. Schumer
Majority Leader
U.S. Senate

The Honorable Kevin McCarthy
Minority Leader
U.S. House of Representatives

The Honorable Mitch McConnell
Minority Leader
U.S. Senate

This report responds to directives from the House Armed Services Committee and the House Committee on Oversight and Reform and its Subcommittee on National Security, regarding the theft of funds from Afghanistan when the government collapsed on August 15, 2021. Following the Taliban takeover, various media accounts reported allegations that former President Ashraf Ghani and his senior advisors fled Afghanistan with millions of dollars in cash loaded onto the helicopters that carried them from the presidential palace to Termez, Uzbekistan, on August 15, 2021. This final report assesses the validity of these allegations.

Although SIGAR found that some cash was taken from the grounds of the palace and loaded onto President Ghani's evacuation helicopters, evidence indicates that this number did not exceed \$1 million and may have been closer in value to \$500,000. Most of this money was believed to have come from several Afghan government operating budgets normally managed at the palace. SIGAR also identified suspicious circumstances in which approximately \$5 million in cash was accidentally left behind at the presidential palace. Some or all of this money likely belonged to President Ghani or the government of the United Arab Emirates. Some or all of it was also supposedly divided by members of the Presidential Protective Service after the helicopters departed but before the Taliban captured the palace.

SIGAR examined other examples of alleged theft by senior Afghan officials as the government collapsed, including tens of millions of dollars from the operating budget of the National Directorate of Security. More broadly, although there appears to have been ample opportunity and effort to plunder Afghan government coffers, at this time SIGAR does not have sufficient evidence to determine with certainty whether hundreds of millions of dollars were removed from the country by Afghan officials as the government collapsed or whether any stolen money was provided by the United States.

SIGAR issued an interim version of this report on June 7, 2022. This final version contains significant updates concerning the millions of dollars that were accidentally left behind by President Ghani's entourage and subsequently stolen from the presidential palace, allegations that millions of dollars were stolen from the vault at the National Directorate of Security as the Taliban captured Kabul, and former President Ghani's response to our questions. Specifically, President Ghani declined SIGAR requests for an interview, agreeing instead to answer our questions through his attorney. On March 14, 2022, SIGAR sent 56 written questions to President Ghani through his attorney concerning these theft allegations and other matters related to SIGAR's congressionally mandated examination of the Afghan government's collapse. On July 28, 2022, through his attorney, President Ghani provided answers to only six of those 56 questions. Those 56 questions and President Ghani's six answers are reproduced in Appendix I.



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Office of the Special Inspector General
for Afghanistan Reconstruction

SIGAR conducted this work under the authority of Public Law No. 110-181, as amended, and the Inspector General Act of 1978, as amended; and in accordance with the *Quality Standards for Inspection and Evaluation*, published by the Council of the Inspectors General on Integrity and Efficiency.

A handwritten signature in black ink, appearing to read "John F. Sopko".

John F. Sopko
Special Inspector General
for Afghanistan Reconstruction

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ABBREVIATIONS

CIA	Central Intelligence Agency
DABS	Da Afghanistan Breshna Sherkat
NDS	National Directorate of Security
NSC	National Security Council
PPS	Presidential Protective Service
UAE	United Arab Emirates

HOW WE DID OUR WORK

Given the difficulty of tracking cash, especially after a national government has collapsed, this report is based primarily on interviews with former Afghan officials, including a number of individuals who flew out of the country on the president's helicopters on August 15, 2021. SIGAR spoke to more than 30 former Afghan officials who worked in the office of the president, National Security Council (NSC), National Directorate of Security (NDS), Presidential Protective Service, Ministry of Defense, and Da Afghanistan Breshna Sherkat (DABS, the national utility company), among others. SIGAR sought these officials out based on their position, access, and ties to others who may have personally witnessed theft. Some former Afghan officials SIGAR contacted did not respond to interview requests, and others declined them outright. Former President Ghani declined our interview request but responded to written questions through his attorney. Those who did speak to us were interviewed individually, allowing SIGAR to compare detailed accounts of key events presented by different individuals for inconsistencies. Where possible, SIGAR used documentary evidence to verify informant claims and media reports to provide additional contextual information. Between the interim and final reports, SIGAR conducted additional interviews, received responses from President Ghani, and analyzed new data to understand and interpret key events.

SIGAR recognizes several factors that the reader may want to consider when reviewing the evidence in this report:

- SIGAR had to rely more heavily on eyewitness testimony than on documentary evidence because undeclared cash leaves no paper trail.
- Many of the officials in a position to witness the alleged theft of money were alleged by other officials to have stolen it.
- All of the individuals SIGAR spoke to—some of whom are well-known former Afghan officials—requested anonymity, which makes it difficult for readers to judge the credibility of individual claims. In drafting this report, SIGAR carefully considered questions surrounding credibility of testimony and motivations of interviewees.
- SIGAR conducted this work under the authority of Public Law No. 110-181, as amended, and the Inspector General Act of 1978, as amended; and in accordance with the *Quality Standards for Inspection and Evaluation*, published by the Council of the Inspectors General on Integrity and Efficiency.

AFGHAN GOVERNMENT FELL AS THE TALIBAN SURROUNDED THE CAPITAL

The speed at which provinces fell to the Taliban in early August 2021 shocked senior Afghan officials. On August 13, only 48 hours before the president would flee the country, he chaired a meeting in his office with Abdullah Abdullah, Vice President Amrullah Saleh, the ministers of interior and defense, and the president's senior staff to discuss the fall of Herat Province. According to a former senior government official present, the assembled officials were still trying to understand why Afghan security forces were consistently abandoning their posts, and the group started pointing fingers at each other. "Up to that point, no one had taken the defense of Kabul very seriously," the official stated.¹ The president interrupted and instructed the group to focus on defending Kabul as the Taliban closed in. The meeting ended with the president deciding to make a video to tell the nation that "we will stand our ground and stop the Taliban advance."²

¹ Former senior Afghan official, SIGAR interview.

² Former senior Afghan official, SIGAR interview.

On Saturday, August 14, the Afghan Army Chief of Staff briefed the president and his staff on how the capital would be defended in the coming 2 weeks, clearly expecting a prolonged fight or negotiation over Kabul.³ Indeed, Ghani instructed his staff to prepare to stay for 2 weeks, on the assumption that Kabul would be protected enough to facilitate a transitional government, according to another former senior official.⁴ To that end, the government's security chief for Kabul was replaced, but the Taliban's momentum seemed irreversible.⁵ As one former senior official recounted to SIGAR:

On Saturday, everyone was panicking. Logar had collapsed as well, and the Taliban had put a lot of pressure on Nangarhar. We were tied up getting the reports to the President, being in touch with every theater in the country. We were basically witnessing the disintegration of the ANDSF [Afghan National Defense and Security Forces]. I was up the whole night Saturday. By half past 3 a.m., I got a report that Nangarhar had collapsed. I decided to go to the National Security Advisor and tell him to his face that it is next to impossible to hold Kabul—based on the experience in 1996 [when the Taliban last seized Kabul]—and that the collapse of Kabul was imminent.⁶

Still, some senior staff continued to believe that panic was unnecessary because the Taliban had agreed with the United States not to enter Kabul until a mutually agreed-upon time.⁷ By mid-morning on Sunday, however, the Presidential Protective Service (PPS) was reporting that the Taliban were about to enter Kabul, and security at Kabul's airport had collapsed.⁸ In fact, according to subsequent press reports, hundreds of Taliban had reportedly already entered Kabul, in violation of an agreement that they would not do so until after the international withdrawal.⁹

The mood in the Presidential palace became especially grim. A large number of ministers and deputy ministers had already left Kabul, and thousands of people who worked at the palace had begun fleeing, leaving behind only a half dozen members of the president's inner circle and the PPS guards who chose to stay.¹⁰ The Indian press reported that around 10 a.m., National Security Advisor Hamdullah Mohib had called presidential advisor Fazel Fazly and told him to instruct the staff at the presidential palace to go home.¹¹ Some senior staff spent the morning signing employment verification letters for their junior staff to support their presumed resettlement applications.¹²

Knowing the Afghan government would be responsible for security in Kabul, senior staff tried to contact the leadership at the ministries of defense and interior to tell them to hold the line. Echoing his colleagues, one former senior official stated:

We couldn't find the minister of defense or the Chief of Army Staff. The MOD [Ministry of Defense] said there was no one left in the [building]. The President spoke with the minister of interior and NDS chief and told them to send people out to the city to keep order. But they didn't have anyone. That day the police had come to work wearing their regular clothes underneath their uniforms.¹³

³ Former senior Afghan official, SIGAR interview.

⁴ Former senior Afghan official, SIGAR interview.

⁵ Former senior Afghan officials, SIGAR interviews.

⁶ Former senior Afghan official, SIGAR interview.

⁷ Former senior Afghan official, SIGAR interview.

⁸ Former senior Afghan official, SIGAR interview.

⁹ Steve Coll and Adam Entous, "The Secret History of the U.S. Diplomatic Failure in Afghanistan," *New Yorker*, December 10, 2021; Matthieu Aikins, "Inside the Fall of Kabul," *New York Times*, December 10, 2021.

¹⁰ Former senior Afghan officials, SIGAR interviews.

¹¹ V. K. Shashikumar, "A Great Afghan Betrayal: A Palace Coup?," *Indian Defence Review*, September 24, 2021.

¹² Former senior Afghan official, SIGAR official.

¹³ Former senior Afghan officials, SIGAR interviews. The *New Yorker* reported that by the morning of August 15, so many policemen, soldiers, and guards in Kabul had abandoned their posts that even the security infrastructure in the diplomatic

Similarly, U.S. and Afghan media reports stated that Ghani tried to call an emergency cabinet meeting that morning at his office (see Photo 1), but was unable to do so because only half of the cabinet could be located. Among those who were missing were First Vice President Saleh and Defense Minister Bismillah Mohammadi.¹⁴ A former senior security official confirmed that Ghani instructed him to “control the chaos inside Kabul,” but “it was so hard to find people.”¹⁵

Photo 1: The Presidential Palace in Kabul



Source: Imagery annotated by a former senior Afghan official.

Meanwhile, Ghani instructed senior staff to continue with a previously planned trip to Doha, Qatar, to negotiate with the Taliban.¹⁶ Within minutes, it had become clear that such a trip had been overcome by events. “We are beyond the stage of negotiating a republic,” another former senior official told an associate at the time. “We are negotiating a peaceful transition of power.”¹⁷ As reports of Taliban entering the city grew, even the prospects of an orderly handover vanished. “The chaos had become so intense that every minute we would hear that a certain district of Kabul had fallen to the Taliban,” said one former senior official.¹⁸ The remaining staff at the palace saw that an evacuation might be necessary and made arrangements to get their passports.¹⁹ Around midday, Ghani agreed to evacuate First Lady Rula Ghani on an afternoon flight to the

Green Zone had collapsed. Steve Coll and Adam Entous, “The Secret History of the U.S. Diplomatic Failure in Afghanistan,” *New Yorker*, December 10, 2021.

¹⁴ Matthieu Aikins, “Inside the Fall of Kabul,” *New York Times*, December 10, 2021; Sanjar Sohail, “Exclusive: The Untold Story of How Afghan President Ashraf Ghani Fled the Country,” *8am*, October 2, 2021.

¹⁵ Former senior Afghan official, SIGAR interview.

¹⁶ Former senior Afghan official, SIGAR interview.

¹⁷ Former senior Afghan official, SIGAR interview.

¹⁸ Former senior Afghan official, SIGAR interview.

¹⁹ Former senior Afghan officials, SIGAR interviews.

United Arab Emirates (UAE), but this quickly escalated to evacuating most senior staff remaining at the palace, excluding himself—approximately 10 people.²⁰ Meanwhile, even the PPS guards had begun changing out of their uniforms.²¹ The head of the PPS, General Qaher Kochai, was telling colleagues that the president was unwilling to leave and imploring them to convince Ghani to depart with the First Lady.²²

Around 2 p.m., some of the president’s most senior staff who had remained at the palace made their way to the palace’s helicopter landing zone (see Photo 1 on p. 3), believing that the president would stay behind as they departed.²³ Waiting for them at the landing zone were three of the four Mi-17 helicopters allocated for Ghani’s movements (see example in Photo 2). According to two former senior officials, these three helicopters were configured for VIP travel and designed to hold approximately nine passengers each. The fourth helicopter in the fleet, which was at the Kabul airport at the time, was configured to carry the president’s large protective detail (up to 26 people) wherever he flew (see Figure 1 on p. 6).²⁴

Photo 2: President Ghani’s Helicopter Landing in Kabul, August 2, 2021



A helicopter carrying President Ashraf Ghani lands at the Darul Aman Palace in Kabul, Afghanistan, Monday, August 2, 2021. (AP Photo/Rahmat Gul)

As the First Lady and senior staff boarded the helicopters that would take them to the airport and onward to the UAE, the pilots said the security situation had deteriorated so much that they could not fly to the airport. PPS chief Kochai then pulled National Security Advisor Mohib out of the helicopter and told him that he could

²⁰ Former senior Afghan official; Steve Coll and Adam Entous, “The Secret History of the U.S. Diplomatic Failure in Afghanistan,” *New Yorker*, December 10, 2021.

²¹ Former senior Afghan official, SIGAR interview.

²² Former senior Afghan officials, SIGAR interviews.

²³ Former senior Afghan official, SIGAR interview.

²⁴ Former senior Afghan officials, SIGAR interviews and communications.

no longer protect the president. If the helicopters were to leave without him, “the president will be killed,” he warned.²⁵

Around the same time, Ghani still hoped to speak to the minister of defense in person at 3 p.m. at the ministry of defense headquarters next to the palace (see Photo 1 on p. 3) to discuss how Kabul could be secured.²⁶ An advance security detail was even sent to the ministry to prepare for his arrival, but Ghani’s plan to go there was scrapped as the Taliban closed in and his aides came to believe that every minute counted.²⁷ With the senior staff and First Lady waiting on the helicopters, Mohib and Kochai returned to the residence to collect Ghani.²⁸ The president was waiting in the foyer and agreed to depart when Mohib and Kochai pressed him. The departure was so sudden that the president was barefoot, forcing Kochai to find the president’s shoes. The president did not have time to get his passport.²⁹ Mohib and Kochai feared that the PPS guards—sensing the tide turning—might execute Ghani, so Mohib, Kochai, and a driver tried to discreetly take the president to the landing zone in a single car. The president’s motorcade accompanied them anyway.³⁰

The President, First Lady, Mohib, and Kochai boarded one helicopter, the approximately 10 remaining senior staff and aides boarded the second helicopter, and approximately 20 to 25 PPS guards boarded the third.³¹ But there was not room for them all. According to one former senior official, “Some of the key people in PPS who headed the intelligence branch and operations were not on the list” of those allowed on the helicopters and “they thought they were left out.”³² One of the PPS guards approached the second helicopter, aimed his rifle, and shouted “Allahu Akbar” (God is great) before being tackled by other PPS guards as the helicopters lifted off.³³ “I truly thought I had a 5 percent chance of getting out alive,” stated another former senior official.³⁴

The two helicopters carrying the president and senior staff departed while the third, overloaded with PPS guards, briefly stayed behind to offload some of the guards. Even after several passengers disembarked and others threw out their body armor, the helicopter was still so heavy that it nearly crashed into trees as it took off and caught up with the first two helicopters.³⁵

²⁵ Former senior Afghan official, SIGAR interview; Steve Coll and Adam Entous, “The Secret History of the U.S. Diplomatic Failure in Afghanistan,” *New Yorker*, December 10, 2021.

²⁶ Former senior Afghan officials, SIGAR interviews.

²⁷ Former senior Afghan officials, SIGAR interviews; Sanjar Sohaib, “Exclusive: The Untold Story of How Afghan President Ashraf Ghani Fled the Country,” *8am*, October 2, 2021. According to an interview with President Karzai, by the time President Ghani flew out of the country, there was no security infrastructure in Kabul anymore. Kathy Gannon, “The AP Interview, Karzai ‘Invited’ the Taliban to Stop Chaos,” *Associated Press*, December 15, 2021.

²⁸ Former senior Afghan officials, SIGAR interviews.

²⁹ Former senior Afghan official, SIGAR interview; Sanjar Sohaib, “Exclusive: The Untold Story of How Afghan President Ashraf Ghani Fled the Country,” *8am*, October 2, 2021.

³⁰ Former senior Afghan officials, SIGAR interviews.

³¹ Former senior Afghan officials, SIGAR interviews and communications.

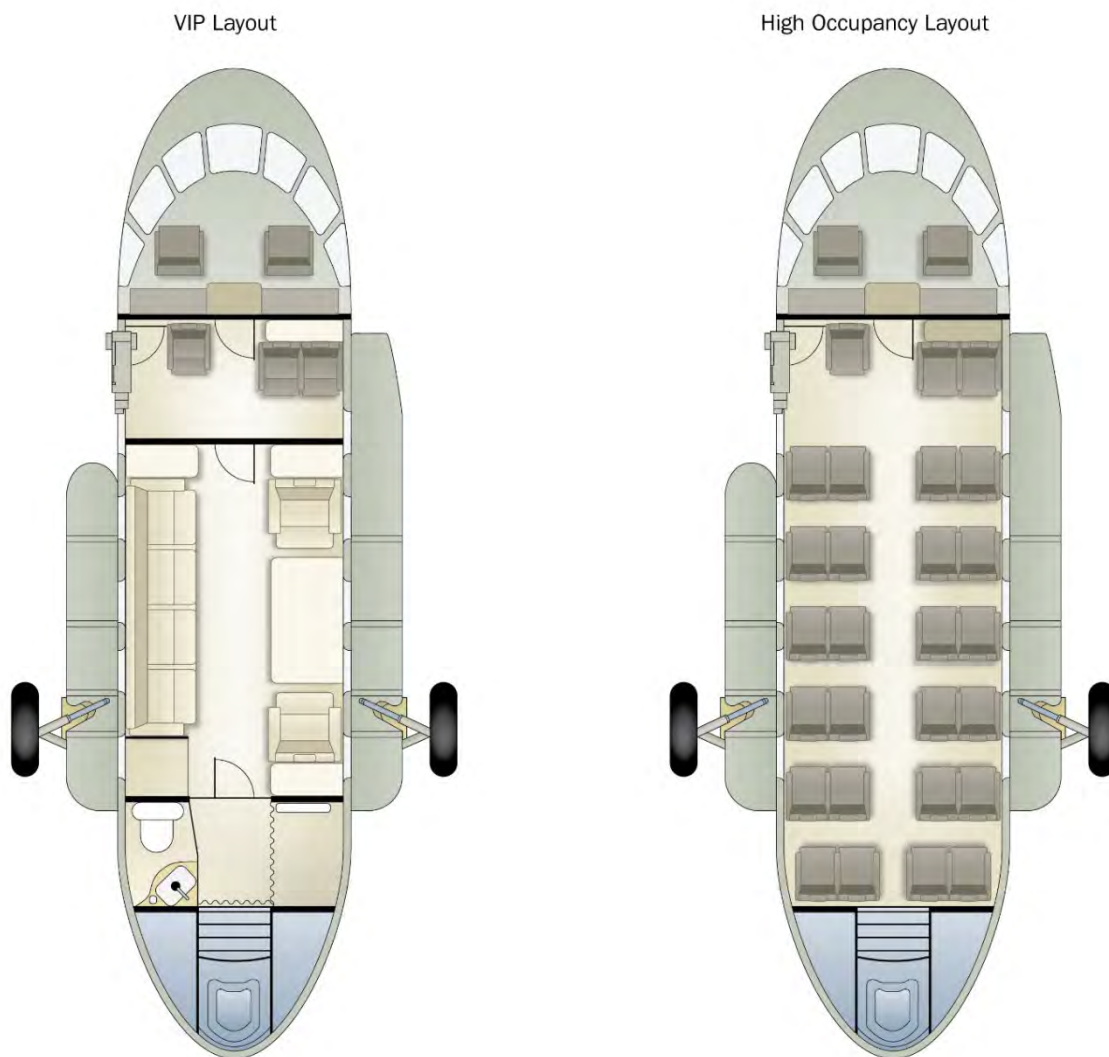
³² Former senior Afghan official, SIGAR interview. According to the *New York Times*, the personal secretary to National Security Advisor Hamdullah Mohib was also forced to disembark from a helicopter prior to departure. Matthieu Aikins, “Inside the Fall of Kabul,” *New York Times*, December 10, 2021.

³³ Former senior Afghan official, SIGAR interview. Press reports also documented that not all of the PPS who wanted to board were able, and a scuffle broke out. Sanjar Sohaib, “Exclusive: The Untold Story of How Afghan President Ashraf Ghani Fled the Country,” *8am*, October 2, 2021.

³⁴ Former senior Afghan official, SIGAR interview.

³⁵ Former senior Afghan officials, SIGAR interviews.

Figure 1: Layouts for Afghan Presidential Mi-17 Helicopters



Source: Diagram based on annotations from former senior Afghan official.

Officials and Their Staff Boarded Helicopters with Minimal Luggage—Some Containing Cash

According to every eyewitness interviewed for this report, the luggage on board the three helicopters was minimal. Some contained personal belongings and others contained cash. The First Lady had two suitcases, as she had had time to pack for a trip to the UAE. Meanwhile, PPS chief Kochai had one suitcase, Deputy National Security Advisor Rafi Fazil had a backpack, NSC Chief of Staff Moqim Abdulrahimzai had a carry-on suitcase, and the assistant for National Security Advisor Mohib carried a suit bag and a laptop bag for Mohib.³⁶ According to one former senior official, inside the First Lady's suitcases were clothes. This official also

³⁶ Former senior Afghan officials, SIGAR interviews.

happened to briefly carry these suitcases and claimed they were not heavy.³⁷ During the prolonged trip to Abu Dhabi, the First Lady and the president were the only members of the entire delegation to be seen wearing different clothes than the ones they boarded the helicopters with. The First Lady's clothes reportedly came from her suitcases, and an aide to the president purchased clothes for him in transit in Uzbekistan.³⁸

Kochai's suitcase carried the monthly discretionary cash budget for the PPS, approximately 20 million Afghanis (\$250,000 at the time), which was retrieved from the PPS office (see Photo 1 on p. 3) as they prepared to depart.³⁹ Another former senior official on board said Kochai's suitcase contained closer to 10 million Afghanis (approximately \$125,000 at the time).⁴⁰ Deputy National Security Advisor Rafi Fazil's backpack contained the monthly discretionary cash budget for the NSC, approximately \$240,000, which was retrieved from the NSC's finance department at Mohib's request as they all prepared to depart.⁴¹ According to a former senior official, both the PPS and NSC discretionary budgets were mostly supplied through a pair of controversial Afghan government accounts known as Code 91 and Code 92 (see box below).⁴²

One former senior official on the helicopters added, "Everyone had \$5,000 to \$10,000 in their pockets. . . . No one had millions."⁴³ Likewise, Ghani and National Security Advisor Mohib have both insisted to the media that they did not flee with millions of dollars that day.⁴⁴ If true, this puts the total amount of cash on board the three helicopters at approximately \$500,000. Despite this, when asked by CBS News months later if the group took any cash with them on board, Mohib responded "absolutely not. . . . We just took ourselves."⁴⁵

Budget Codes 91 and 92 Were Disbursed with Little Transparency or Accountability

The former Afghan government had two controversial contingency budgets that had earned a reputation for being slush funds disbursed with minimal oversight. These funds, which the president typically controlled, were known as Code 91 and Code 92, and they reportedly totaled nearly \$200 million in 2021.⁴⁶

The 2005 Public Financial Management and Expenditures Law designated Code 91 as a "policy reserve [where] the expenditure is urgent and could not be predicted before the

³⁷ Former senior Afghan official, SIGAR interview.

³⁸ Former senior Afghan officials, SIGAR interviews; CBS News, "Face the Nation," December 19, 2021, <https://www.youtube.com/watch?v=q5t8Khew004>.

³⁹ On August 15, 2021, the U.S. dollar was worth 79.647 Afghanis. Former senior Afghan official, SIGAR interview; Oanda.com.

⁴⁰ On August 15, 2021, the U.S. dollar was worth 79.647 Afghanis. Former senior Afghan official, SIGAR interview; Oanda.com.

⁴¹ Former senior Afghan officials, SIGAR interviews and communications. According to the *New York Times*, an Afghan official said that he saw Mohib and his staff carrying bags and talking about the Afghan NSC's operational cash. Matthieu Aikins, "Inside the Fall of Kabul," *New York Times*, December 10, 2021.

⁴² Former senior Afghan official, SIGAR interview.

⁴³ Former senior Afghan official, SIGAR interview.

⁴⁴ "Ghani Denies Taking Large Sums of Money as He Fled Afghanistan," *Al Jazeera*, August 18, 2021; Lynne O'Donnell, "Former Afghan Advisor: Biden's Withdrawal was the Tipping Point for Afghanistan," *Foreign Policy*, January 22, 2022.

⁴⁵ CBS News, "Face the Nation," December 19, 2021, <https://www.youtube.com/watch?v=q5t8Khew004>.

⁴⁶ Roxanna Shapour, "Realpolitik and the 2021 National Budget: The Toxic Struggle for Money and Power that Undermined Afghanistan's Republic," Afghanistan Analysts Network, December 21, 2021. During the National Unity Government that ruled between the 2014 and 2020 and under which Abdullah Abdullah held the title of Chief Executive Officer, control over funds from budgetary code 91 were split between he and President Ghani 30/70. Mir Haidar Shah Omid, "High Council Funded by Code 91 Until Formally in Budget," *Tolo News*, May 19, 2020; Zabihullah Jahanmal, "Extra Money Allocated to 'Code 91' Documents," *Tolo News*, November 4, 2019; Mohammad Qadam Shah, "Why Afghanistan is Caught in a Budget Crisis – Again," *Diplomat*, February 4, 2021.

budget was adopted by parliament.” Similarly, Code 92 was classified as a “contingency reserve [where] a state of emergency has been declared for the country or affected area.”⁴⁷

In response to questions from SIGAR, Ghani’s attorney said that the former president established a committee in February 2020 “to enhance oversight and transparency of funds used from Code 91 and Code 92.”⁴⁸ This committee was appointed by Ghani and included the director general of the administrative office of the president, Fazel Fazly; the deputy minister of finance; and a member of the relevant government body requesting money.⁴⁹ A former senior official confirmed to SIGAR that this committee was used as designed.⁵⁰ However, as with many Afghan government reforms, it side-stepped the signature problem: Rather than operate with parliamentary oversight, the committee consisted solely of senior government officials, who were appointed by and beholden to the president.⁵¹

According to Integrity Watch Afghanistan, abuse of these funds started under the Karzai administration but worsened under Ghani.⁵² Numerous press reports have also alleged that the Ghani administration misused the accounts.⁵³ According to the news outlet *Kabul Now*, Code 91 was used to fund a wide array of illegitimate expenses, including house rentals for personal use, medical expenses, bonuses, and political events.⁵⁴

A total of 25 government offices reportedly received funding from Code 91, including the Administrative Office of the President, NSC, and NDS.⁵⁵ *Kabul Now* reported that several senior members of the Ghani administration received hundreds of thousands of dollars in payments from Code 91. Two of these senior officials flew out of the country with the president the day Kabul fell: presidential advisor Waheed Omar, who allegedly received more than 30 million Afghanis (roughly \$400,000), and the director general of the administrative office of the president, Fazel Fazly, who allegedly received almost 13 million Afghanis (roughly \$166,000).⁵⁶ Waheed Omar publicly refuted the charges, claiming that the funds were for legitimate purposes and simply appeared irregular because his office was established late in the year, necessitating the use of Code 91 money for official work.⁵⁷

Spending under the two accounts also repeatedly exceeded Afghan legal limits. Under Article 32 of the Public Financial Management and Expenditures Law, a maximum of 3 percent of

⁴⁷ Government of Afghanistan, European Union, UK Aid, and World Bank, *Public Accountability and Financial Accountability Performance Assessment: Afghanistan Report*, June 2018, p. 40; Mohammad Qadam Shah, “Why Afghanistan is Caught in a Budget Crisis – Again,” *Diplomat*, February 4, 2021.

⁴⁸ Letter from Reid H. Weingarten on behalf of President Ashraf Ghani, in response to SIGAR questions, July 28, 2022.

⁴⁹ Mohammad Qadam Shah, “Why Afghanistan is Caught in a Budget Crisis – Again,” *Diplomat*, February 4, 2021.

⁵⁰ Former senior Afghan official, SIGAR interview.

⁵¹ Mohammad Qadam Shah, “Why Afghanistan is Caught in a Budget Crisis – Again,” *Diplomat*, February 4, 2021; Zabihullah Jahanmal, “Extra Money Allocated to ‘Code 91’ Documents,” *Tolo News*, November 4, 2019.

⁵² Roxanna Shapour, “Realpolitik and the 2021 National Budget: The Toxic Struggle for Money and Power that Undermined Afghanistan’s Republic,” Afghanistan Analysts Network, December 21, 2021.

⁵³ Massoud Ansar, “Parliament to Probe Alleged Embezzlements from Code 91,” *Tolo News*, January 8, 2020; Mohammad Qadam Shah, “Why Afghanistan is Caught in a Budget Crisis – Again,” *Diplomat*, February 4, 2021.

⁵⁴ Mohtar Yasa, “91 Code Scandal: How Millions of Afghanis Spent for Personal Causes?,” *Kabul Now*, December 16, 2020.

⁵⁵ Mohtar Yasa, “91 Code Scandal: How Millions of Afghanis Spent for Personal Causes?,” *Kabul Now*, December 16, 2020.

⁵⁶ Nabilla Ashrafi, “President’s Adviser Defends Use of Code 91 Funds,” *Tolo News*, December 13, 2020; Mohtar Yasa, “91 Code Scandal: How Millions of Afghanis Spent for Personal Causes?,” *Kabul Now*, December 16, 2020.

⁵⁷ Nabilla Ashrafi, “President’s Adviser Defends Use of Code 91 Funds,” *Tolo News*, December 13, 2020.

the overall Afghan government budget could be spent on contingencies.⁵⁸ However, analysis of a sample of budgeted and actual expenditures in 3 recent years showed that both figures regularly exceeded this cap. In addition, in 2019 Ghani reportedly increased spending on Code 91 to three times the level approved by Parliament.⁵⁹

While SIGAR was unable to trace the origin of the money going into the Code 91 and 92 accounts through Afghanistan's financial management system, for the past 3 years that data is available, donors, including the United States, funded approximately 50 percent of the Afghan government's budget.⁶⁰

Presidential Helicopters Were Reportedly Overloaded with Passengers, Fuel, and Armor, Leaving Little Space or Payload Capacity for Cargo

The Russian embassy in Kabul asserted in the press that there was \$169 million on board the helicopters, and 2 days later the Afghan ambassador to Tajikistan, Zahir Aghbar, echoed these claims in a press conference.⁶¹ Ambassador Aghbar also vowed to file a request with Interpol to arrest Ghani.⁶² However, Aghbar declined to sit for an interview with SIGAR or provide any evidence substantiating this claim.

This amount of cash would have been difficult to conceal. It would be quite substantial in terms of bulk and heft: \$169 million in hundred dollar bills, stacked end to end, would form a block 7.5 feet long, 3 feet wide, and 3 feet tall. In other words, it would be somewhat larger than a standard American three-seater couch.⁶³ This block would have weighed 3,722 pounds, or nearly 2 tons.⁶⁴ The Mi-17 helicopters that the group flew on do not have separate cargo holds (see Figure 1 on p. 6). Therefore, all of the cargo would have been visible in the cabin next to the passengers.

Among the individuals SIGAR interviewed who were either present at the landing zone or passengers on the helicopters, no one saw anything that resembled cargo on board or being loaded into the helicopters. To the contrary, according to SIGAR interviews and press reports, the helicopters were already overloaded with passengers and fuel and could not have taken off with significant additional weight.⁶⁵ According to U.S. media reports, the pilots of the helicopters at the palace tried to limit the passenger load of each VIP helicopter to only six people.⁶⁶ This clearly did not work in every case, as the third VIP helicopter was filled with more than

⁵⁸ Government of Afghanistan, European Union, UK Aid, and World Bank, "Public Accountability and Financial Accountability Performance Assessment: Afghanistan Report," June 2018, p. 40.

⁵⁹ Roxanna Shapour, "Realpolitik and the 2021 National Budget: The Toxic Struggle for Money and Power that Undermined Afghanistan's Republic," Afghanistan Analysts Network, December 21, 2021; Government of Afghanistan, European Union, UK Aid, and World Bank, "Public Accountability and Financial Accountability Performance Assessment: Afghanistan Report," June 2018, p. 40.

⁶⁰ World Bank, "Afghanistan Development Update: Setting Course to Recovery," April 2021, p. 34.

⁶¹ "Russia Says Afghan President Fled with Cars and Helicopters Full of Cash," *Reuters*, August 16, 2021; Mychael Schnell, "Afghan Ambassador Says Ghani Stole Millions, Calls for Arrest," *Hill*, August 18, 2021.

⁶² Mychael Schnell, "Afghan Ambassador Says Ghani Stole Millions, Calls for Arrest," *Hill*, August 18, 2021.

⁶³ U.S. Numismatic Association, "The National Banking System," accessed February 18, 2022, <https://www.money.org/money-museum/virtual-exhibits/hom/case32>.

⁶⁴ U.S. Bureau of Engraving and Printing, "FAQs," accessed February 9, 2022, <https://www.moneyfactory.gov/resources/faqs.html>.

⁶⁵ Former senior Afghan officials, SIGAR interviews; Matthieu Aikins, "Inside the Fall of Kabul," *New York Times*, December 10, 2021.

⁶⁶ Steve Coll and Adam Entous, "The Secret History of the U.S. Diplomatic Failure in Afghanistan," *New Yorker*, December 10, 2021. The sources SIGAR examined differed on the precise maximum passenger load. One interviewee told SIGAR that the VIP-configured helicopters could only take 6 to 10 people each. Former senior Afghan official, SIGAR interview.

20 PPS guards. “We could not have fit 40 people *and* all that cash [in three helicopters],” one former senior Afghan official stated.⁶⁷

Similarly, SIGAR assesses that—given the equipment involved—it would be difficult to transfer nearly two tons of cash from vehicles to the helicopters. National Security Advisor Mohib and the First Lady reportedly traveled from the Presidential palace to the landing zone in two armored Land Cruisers, which were standard in the president’s motorcade.⁶⁸ An armored Land Cruiser has a payload capacity of approximately 2,000 pounds.⁶⁹ Therefore, 3,722 pounds of cash would have to be divided between multiple, largely empty vehicles, and possibly loaded with special equipment. Transferring the money would have been logistically complex and probably quite visible to the passengers and bystanders. One of the former senior officials SIGAR interviewed pointed this out unprompted. “Frankly, I cannot rationalize [the allegations],” he said. “It’s not easy to move that much money.”⁷⁰

In addition, the hot weather and fuel load of the helicopters could not have sustained the additional weight of heavy cash. August 15 was a hot day in Kabul, with a high of 87 degrees Fahrenheit.⁷¹ Meanwhile, the helicopters were already operating at Kabul’s relatively high altitude of 5,900 feet and would likely need to cross higher mountains.⁷² Both warm temperatures and high altitude make the air less dense, which reduces helicopter performance and payload capacity. Specifically, less dense air has less oxygen by volume, causing the engine to perform less efficiently.⁷³ If the reports that the helicopters were fully fueled were true, the 720 gallons of fuel alone that each carried would have reduced their payload capacity by half.⁷⁴ That these helicopters were allegedly armored for presidential travel would have reduced their payload capacity even further.⁷⁵

Senior Officials Hastily Departed Without a Set Destination and Chose to Fly to Uzbekistan Once Airborne

Almost as soon as the president boarded his helicopter, the three helicopters departed and headed north.⁷⁶ Contingency plans for such an evacuation had been discussed in the past. If he ever needed to evacuate the palace, according to one former senior official, the plan was to take the president to either Nangarhar, where he had received many votes in previous elections, or Khost (see Figure 2 on p. 11), where the Khost Protection Force—predominately from the Tanai tribe—could protect the president. Both Ghani and Mohib have publicly recounted that they initially directed the pilots to fly to Khost upon liftoff, but they quickly determined they

⁶⁷ Former senior Afghan official, SIGAR interview.

⁶⁸ Former senior Afghan officials, SIGAR interviews.

⁶⁹ Government Services Administration and Battelle, Federal Supply Schedule 084 – Total Solutions for Law Enforcement, Security, Facility Management Systems, Fire, Rescue, Special Purpose Clothing, Marine Craft and Emergency/Disaster Response, June 2020, p. 8.

⁷⁰ Former senior Afghan official, SIGAR interview.

⁷¹ Weather.com archive.

⁷² “Kabul, National Capital, Afghanistan,” *Brittanica*, accessed March 17, 2022.

⁷³ The decline in aircraft performance caused by high temperatures and high altitudes, as well as high humidity and low atmospheric pressure, is called a high density altitude situation. Federal Aviation Administration website, “Helicopter Performance Factors,” accessed February 18, 2022; International Helicopter Safety Team, “Training Fact Sheet: Density Altitude,” April 8, 2017.

⁷⁴ *Janes*, “Kazan Mil/Mi-17,” August 19, 2020, accessed February 2, 2022.

⁷⁵ Former senior Afghan official, SIGAR interview.

⁷⁶ Former senior Afghan official, SIGAR interview.

would need to fly to another country.⁷⁷ At that point, the range of the helicopters limited which countries they could consider.

Figure 2: Map of President Ghani's Reported Evacuation Options



Source: Former senior Afghan official, SIGAR interview; “Ex-Afghan President Says Decision to Flee Kabul was Made in ‘Minutes,’” *France 24*, December 30, 2021; CBS News, “Face the Nation,” December 19, 2021.

According to one former senior official on board:

As we were in the air, the pilots were still unsure about where to go. . . . The pilots consulted me and said the closest place they could land was Tajikistan. The fear was that as long as we were in Afghan airspace, we could be shot down. The President’s choice was Termez [Uzbekistan], because there was a historical precedent of Afghan leaders fleeing to Uzbekistan. He thought they would be treated fairly, although I knew that sometimes they imprisoned our leaders. There was no precedent for Tajikistan.⁷⁸

As these discussions happened in Ghani’s helicopter, the staff, crew, and PPS guards in the other two helicopters had no idea where they were going. Some were so uninformed that they only realized they were not going to Doha via the airport when they noticed they were climbing over the Hindu Kush mountains.⁷⁹ It was

⁷⁷ Former senior Afghan official, SIGAR interview; “Ex-Afghan President Says Decision to Flee Kabul was Made in ‘Minutes,’” *France 24*, December 30, 2021; CBS News, “Face the Nation,” December 19, 2021, <https://www.youtube.com/watch?v=q5t8Khew004>.

⁷⁸ Former senior Afghan official, SIGAR interview. According to one press report, the convoy of helicopters first flew to the border between Afghanistan and Tajikistan, but, after they were unable to raise Tajik authorities on the radio, they flew on to Uzbekistan. However, reports about this are contradictory. Sanjar Sohaib, “Exclusive: The Untold Story of How Afghan President Ashraf Ghani Fled the Country,” *8am*, October 2, 2021.

⁷⁹ Former senior Afghan officials, SIGAR interviews.

around that time that they learned Ghani was in one of the other helicopters.⁸⁰ The flight crew was “trying to make contact with the Uzbek border police . . . but couldn’t reach them,” stated one former senior official.⁸¹ The three helicopters traveled west along Afghanistan’s northern border until they reached Termez, Uzbekistan, where they landed suddenly and without permission as their fuel ran out.⁸²

Uzbek Officials Greeted the Afghan Delegation with Hostility and Compelled Them to Depart Quickly

When the first three of four helicopters touched down with 40 people on board, they were quickly surrounded by Uzbek security personnel with their weapons drawn.⁸³ When they learned that Ghani was in the party, Uzbek officials escorted the president, First Lady, and National Security Advisor Mohib to the main terminal. Soon after, the fourth presidential helicopter arrived. It had been at Kabul airport when the other three departed the palace and carried approximately 14 people, mostly engineers who maintained the presidential helicopter fleet.⁸⁴ This brought the total number of Afghans who arrived on the presidential helicopters to 54.

All passengers and crew were searched, along with the helicopters themselves. Possessions were turned over to Uzbek authorities for cataloguing and photographing—everything from luggage to the bullets in the guns of the PPS guards to the contents of everyone’s pockets. Everyone was individually and repeatedly questioned about their jobs and the events of the day. Then the helicopters were sealed and most of the group spent most of the night stranded on the tarmac encircled by armed Uzbek guards.⁸⁵

That evening, two of the president’s advisors, Fazil Fazly and Rafi Fazil, were also summoned to the terminal where Ghani, the First Lady, and National Security Advisor Mohib were staying and took possession of the NSC funds to arrange their onward flight.⁸⁶ According to one former senior official, “the Uzbeks said we all had to leave at once.”⁸⁷ Multiple former officials heard the First Lady say she had only \$800 with her. So the president’s staff used some of the money they took from the palace to pay \$120,000 to charter a Kazak Bombardier plane to Abu Dhabi in the UAE.⁸⁸ It seated 50, but the four additional evacuees sat in aisles, allowing all 54 Afghans who landed in Termez in the four helicopters to fly to Abu Dhabi together, according to the flight manifest.⁸⁹ They departed the evening of August 16, were greeted by Emirati officials in Abu Dhabi, and arrived at the St. Regis Hotel around midnight.⁹⁰ All bags and luggage that were originally loaded onto the helicopters in Kabul were seen by various witnesses at each stop, all the way to the St. Regis.⁹¹

⁸⁰ Former senior Afghan official, SIGAR interview.

⁸¹ Former senior Afghan official, SIGAR interview.

⁸² Former senior Afghan officials, SIGAR interviews; Matthieu Aikins, “Inside the Fall of Kabul,” *New York Times*, December 10, 2021.

⁸³ Matthieu Aikins, “Inside the Fall of Kabul,” *New York Times*, December 10, 2021.

⁸⁴ Former senior Afghan officials, SIGAR interviews and communications; Sanjar Sohaib, “Exclusive: The Untold Story of How Afghan President Ashraf Ghani Fled the Country,” *8am*, October 2, 2021.

⁸⁵ Former senior Afghan officials, SIGAR interviews; Matthieu Aikins, “Inside the Fall of Kabul,” *New York Times*, December 10, 2021.

⁸⁶ Former senior Afghan officials, SIGAR interviews and communications.

⁸⁷ Former senior Afghan official, SIGAR interview.

⁸⁸ Former senior Afghan officials, SIGAR interviews.

⁸⁹ Former senior Afghan official, SIGAR interview; “Canary Trap, Leaked Charter Flight Manifest” on Twitter, August 28, 2021. The leaked flight manifest was confirmed as authentic by two former officials. While it showed 52 people, the real number of passengers on board was 54.

⁹⁰ Former senior Afghan officials, SIGAR interviews.

⁹¹ Former senior Afghan officials, SIGAR interviews.

Afghan Officials Spent the Remaining Money Supporting Families and Colleagues Still in Afghanistan and On Their Own Onward Travel

Once at the St. Regis, most of the 54 Afghans stayed there for weeks, if not longer. The Emiratis would not allow them to leave the hotel without permission, even going so far as to confiscate passports for those who had them and prohibiting engagement with the media as a condition for hosting them.⁹² The remaining cash that was not spent on the charter plane was distributed among these 54 people. Some was sent to family members of PPS guards still in Afghanistan, some was sent to senior staff still in Afghanistan, some was given to senior staff for commercial airfare to third countries where they had citizenship, and the rest was distributed among the group as they departed the St. Regis.⁹³

\$5 MILLION WAS ALLEGEDLY LEFT BEHIND BY THE PRESIDENT'S DELEGATION BUT TAKEN FROM THE PALACE BEFORE THE TALIBAN ARRIVED

According to two former senior Afghan officials, around the time the president's party arrived in Termez, the PPS guards who had stayed behind at the palace discovered approximately \$5 million in cash on the palace grounds. The PPS guards fought over how to distribute this money as the Taliban closed in on the palace, according to multiple former Afghan officials.⁹⁴ One former senior PPS official who stayed behind said that the money was divided into three or four bags and loaded into the trunks of cars belonging to the president's motorcade, which then departed from the president's home.⁹⁵ Shortly after, another former senior official interviewed by SIGAR may have seen these same cars departing the palace. This official, who was stuck at the Ariana gate (see Figure 1 on p. 3), noticed that PPS was stopping all cars from leaving the palace grounds. However, he alleged that several cars belonging to the president's motorcade were allowed to pass through. When he asked PPS gate guards about those vehicles, he was told they were going to pick up former President Karzai, which struck him as bizarre. "Usually the ex-President has his own motorcade," he told SIGAR.⁹⁶ This official was unaware that PPS had allegedly loaded the cash at the residence into the president's cars.

Multiple former senior officials were told that this \$5 million was the president's personal money and was declared in his assets.⁹⁷ One former senior official similarly insisted this was the case in an interview with SIGAR and asserted that the president used this money to help displaced Afghans, even in the final days leading up to the collapse.⁹⁸ In 2015, shortly after becoming president, Ghani was required by Afghan law to declare his assets to the government's High Office of Anti-Corruption. A copy of this asset declaration was obtained and reviewed by SIGAR (see Table 1 on p. 14). Table 1 suggests that in 2015, Ashraf and Rula Ghani had a combined net worth of at least \$13 million, including \$5.44 million in liquid assets.

If the \$5 million left behind at the palace belonged to Ghani and this declaration is truthful, then it is reasonable to believe that nearly all of the president's declared \$5.44 million in liquid assets were kept in cash inside the presidential palace. Indeed, in response to questions from SIGAR about this large sum of cash, Ghani's attorney said that "President Ghani had publicly announced his commitment to using his personal cash assets to establish a foundation in his ancestral village including a Presidential Library, an Islamic Studies

⁹² Former senior Afghan officials, SIGAR interviews.

⁹³ Former senior Afghan officials, SIGAR interviews.

⁹⁴ Former senior Afghan officials, SIGAR interviews.

⁹⁵ Former senior Afghan official, SIGAR interview.

⁹⁶ Former senior Afghan official, SIGAR interview.

⁹⁷ Former senior Afghan officials, SIGAR interviews.

⁹⁸ Former senior Afghan official, SIGAR interview.

Center, and an agricultural center.”⁹⁹ However, this does not seem plausible even to the president’s own former staff. One former senior official said that “\$5 million is a lot of money, and no one keeps that in their house.”¹⁰⁰ Although such a scenario is possible, in our view, Ghani’s response explains why he would keep these assets liquid, but not why he would keep them as cash under the proverbial mattress for nearly 6 years.

Table 1: Highlights from Ashraf and Rula Ghani’s Assets and Liabilities, As Declared in September 2015

Assets and Liabilities	Amount
Home in Kabul	\$5.88 million
Apartment in Washington, DC	\$374,000
Capital from selling property in the United States and Rula Ghani’s family property in Lebanon	\$5.37 million
Vehicles	\$1.7 million
Cash in all domestic and international bank accounts	\$71,582
Inherited jewelry	\$53,000
Book collection	\$20,000
Debt (DC rental property mortgage)	-\$64,000
TOTAL	\$13.4 million

Note: All numbers except cash in bank accounts were provided in Afghani and converted into dollars by SIGAR using a June 2015 conversion rate.

Source: Islamic Republic of Afghanistan, High Office of Anti-Corruption, “Asset Registration and Verification Form,” Registration No. 5913, 11/06/1394 (September 2, 2015).

However, multiple former senior officials claimed that this money was actually not the president’s personal money, but leftover funds provided by the UAE to support Ghani’s 2019 reelection campaign.¹⁰¹ One former senior official noted that it was quite common for governments around the world—including the United States—to discretely provide large amounts of cash to the Afghan government in service of various political interests.¹⁰² Indeed, another former official described witnessing such payments. He told SIGAR that, on an official trip to the UAE in October 2019, he saw Emirati officials giving a senior advisor to Ghani a suitcase filled with \$5 million in hundred dollar bills for the “post-election finances” of the previous month’s presidential election.¹⁰³ This handover of cash was reportedly one of many.¹⁰⁴

SIGAR also found discrepancies in the timeline for when this money was removed from the president’s residence. One former senior official alleged that this money was already in the trunks of the president’s cars before the president departed. The Russian embassy in Kabul has claimed that Ghani had to leave this money behind at the landing zone, because not all of it would fit in the helicopters as he and his associates flew out.¹⁰⁵ Others claim the money was found and divided in the residence after he departed and thus was never at the landing zone.¹⁰⁶ More broadly, people at the palace that day offered divergent times for when the helicopters departed—ranging from 1:30 p.m. to 3:45 p.m.¹⁰⁷

However, some of these discrepancies may point to the existence of two separate stockpiles of cash. Around 10 a.m. on August 15, President Ghani was photographed speaking with Mohib and an Emirati official known as “Saif”—a meeting that was not on the president’s schedule, according to the *New York Times* (see Photo 3 on p. 15).¹⁰⁸ It is unknown what they discussed, but shortly afterward, Mohib and Saif returned to Mohib’s office and summoned a senior official later interviewed by SIGAR. Mohib informed this official that several bags

⁹⁹ Letter from Reid H. Weingarten on behalf of President Ashraf Ghani, in response to SIGAR questions, July 28, 2022.

¹⁰⁰ Former senior Afghan official, SIGAR interview.

¹⁰¹ Former Afghan officials, SIGAR communications and interviews.

¹⁰² Former senior Afghan official, SIGAR interview.

¹⁰³ Former senior Afghan official, SIGAR communications. According to SIGAR’s lessons learned report on U.S. support to Afghan elections, the “post-election” phase of most Afghan elections involved considerable manipulation of the electoral dispute resolution process through the bribery of election officials. SIGAR, *Elections: Lessons from the U.S. Experience in Afghanistan*, SIGAR-21-16-LL, February 2021, p. 166.

¹⁰⁴ Former senior Afghan official, SIGAR communications.

¹⁰⁵ “Russia Says Afghan President Fled with Cars and Helicopters Full of Cash,” *Reuters*, August 16, 2021.

¹⁰⁶ Former senior Afghan officials, SIGAR interviews.

¹⁰⁷ Former senior Afghan officials, SIGAR interviews.

¹⁰⁸ Matthieu Aikins, “Inside the Fall of Kabul,” *New York Times*, December 10, 2021.

of “books and important documents” would soon need to be taken to the Emirati embassy. This former senior Afghan official told SIGAR he did not see or hear about those Emirati bags again due to the chaos of the next few hours, but separately, he said several bags of “books and documents” were loaded into Ghani’s motorcade and taken with him when he went to the landing zone.¹⁰⁹

Once airborne, Mohib asked this official if these bags had made it on board. The official radioed the other helicopters to ask, and learned that these bags were not loaded by the flight crew because they believed additional passengers were more important than mere “books and documents.” When the message was relayed to Mohib in the lead helicopter, he said, “Oh, that’s not good—there was money in the bags,” according to a witness.¹¹¹ President Ghani’s attorney likewise confirmed to SIGAR that “the great majority of [Ashraf and Rula Ghani’s] personal belongings . . . including their cash assets . . . were left behind when they left Afghanistan on August 15, 2021, and eventually stolen.”¹¹²

While this former senior official with direct knowledge of this cash was confident that there were two separate stockpiles—one intended for the Emirati embassy, and one to accompany the president—he could not be certain whether the Emirati stockpile ever arrived at the embassy, was combined with the president’s stockpile as panic ensued, or was ransacked separately on the palace grounds.¹¹³ The accounts and evidence collected by SIGAR and described above would support any of those three scenarios, but likely only those three.

Photo 3: Ghani Meets with National Security Advisor Mohib and Emirati Official



President Ghani (right) meets with National Security Advisor Hamdullah Mohib (left) and an Emirati official known as “Saif” the morning of August 15, 2021.

Source: Jawed Kootwal, chief of staff to presidential advisor Akram Khpalwak, posted to Kootwal’s Facebook page, reprinted with permission.¹¹⁰

MILLIONS OF DOLLARS WERE ALLEGEDLY STOLEN FROM THE NDS AS THE GOVERNMENT COLLAPSED

Even more mysterious than the alleged \$5 million inside the president’s residence is the far larger NDS operating budget. According to multiple former senior officials, the NDS annual budget was approximately 18 billion Afghanis (\$225 million at the time of collapse), with a cash operating budget reaching many tens of millions of dollars.¹¹⁴ One former senior official said that at one point over the summer of 2021, the NDS operating reserve had \$70 million in cash.¹¹⁵ This budget was usually used to fund anti-Taliban militias and to maintain the support of local powerbrokers and communities. These activities soared as the country’s

¹⁰⁹ Former senior Afghan official, SIGAR interview.

¹¹⁰ Jawed Kootwal Facebook page, October 2, 2021, <https://www.facebook.com/photo/?fbid=10219839026271087&set=pcb.10219839015230811>.

¹¹¹ Former senior Afghan official, SIGAR interview.

¹¹² Letter from Reid H. Weingarten on behalf of President Ashraf Ghani, in response to SIGAR questions, July 28, 2022.

¹¹³ Former senior Afghan official, SIGAR interview.

¹¹⁴ On August 15, 2021, the U.S. dollar was worth 79.647 Afghanis. Former senior Afghan officials, SIGAR interviews; Oanda.com.

¹¹⁵ Former senior Afghan official, SIGAR interview.

provinces fell one by one that summer, reaching a crescendo in the government's final 2 weeks.¹¹⁶ By the time of collapse, this cash budget had decreased by many millions of dollars. according to two former senior officials.¹¹⁷ As another former senior official recalled, at the urging of the president and the cabinet, "We used a lot of money to send and buy weapons at the end. The governors told us to push the people to help them protect different areas. NDS was the last organization to support them and work with them. We carried a lot of money to different people, like tribal leaders."¹¹⁸

According to one former senior official, on August 14, this cash reserve of U.S. dollars disappeared from the NDS vault. By the time the Taliban arrived the following day, only a small reserve of Afghanis remained.¹¹⁹ As this money was not a line item on any budget, it is difficult to track.¹²⁰ In fact, two other former senior officials claimed this money was not stolen at all, but simply transferred to the Taliban shortly after the collapse. "The officers in [the NDS treasury department] sat with the Taliban and gave them a complete accounting of what expenditures they had over the last months, how much money we got from the Ministry of Finance, and how much money we had in the Treasury. Then the Taliban became convinced that no money had been stolen," one said.¹²¹ However, when SIGAR reached out to a third former official who was reportedly present for this handover, he indicated he has been in hiding and moving from one place to another continuously since the August 15 collapse.¹²² So SIGAR was unable to confirm what, if anything, was handed over.

According to another former senior official, there were very few people with access to this NDS cash budget, and the key manager in the NDS treasury who oversaw disbursements was replaced 2 weeks before the government collapsed.¹²³ Another former senior official, however, says the person who was replaced left voluntarily and did not have access to the vault containing the cash reserve. Moreover, multiple former officials claimed there was only one set of keys to access the vault, which the treasurer kept on him at all times.¹²⁴

More broadly, according to another former senior official, replacing key officials with disbursement authority as the government collapsed was a common method to discretely steal funds amid the chaos. He recounted how 2 weeks before the government fell, he was being pressured to pilfer his own office's remaining coffers:

We had about \$39 million dollars in the account at [my government office], which was very cash heavy compared to the rest of the government. Then the last week before the collapse I started getting two kinds of calls from people playing "good cop" and "bad cop." The good cops said, "Everything is going to fall, let's cash out." The bad cops said, "If you don't help us manage this, you'll be in trouble." The good cops said "Here, hire this guy and [put him in charge of the finances] and everything will be taken care of." [After I departed the country shortly before the collapse] the bad cops became very friendly and the good cops asked me to sign over authority and told me you'll get half the money, \$20 million. . . . Then the fall happened.¹²⁵

¹¹⁶ Former senior Afghan officials, SIGAR interviews.

¹¹⁷ By the time of the collapse, one former senior official said the cash budget contained \$54 million, while another said it dropped as low as \$40 million. Former senior Afghan officials, SIGAR interviews.

¹¹⁸ Former senior Afghan official, SIGAR interview.

¹¹⁹ Former senior Afghan official, SIGAR interview.

¹²⁰ Former senior Afghan official, SIGAR interview.

¹²¹ Former senior Afghan officials, SIGAR interviews.

¹²² Former senior Afghan official, SIGAR communications.

¹²³ Former senior Afghan official, SIGAR interview.

¹²⁴ Former senior Afghan officials, SIGAR interviews.

¹²⁵ Former senior Afghan official, SIGAR interview.

SIGAR was generally unable to trace allegedly stolen funds back to U.S. assistance but continues to investigate.¹²⁶ For example, SIGAR has never been privy to the NDS budget, so we are unable to determine whether the tens of millions of dollars possibly taken from the NDS vault were originally provided by the U.S. government. Media and academic accounts have suggested that the Central Intelligence Agency (CIA) historically funded the NDS.¹²⁷ In a written statement in response to SIGAR's questions to President Ghani, his attorney likewise noted that "the only Afghan government agency with hard currency reserves was the National Directorate of Security, which held reserves provided by, and managed by, the United States and international partners."¹²⁸ A former senior official at NDS, however, claimed that in recent years, his CIA partners had grown uncomfortable with their funds being used to support anti-Taliban militias, forcing NDS to exclusively use Afghan government funds to support them. When pressed, the former senior official insisted that none of NDS' most recent \$225 million annual budget came from the CIA.¹²⁹ Another former senior official claimed CIA support for the NDS ended 5 to 6 months before the collapse, and in recent years comprised 15 to 20 percent of their operating budget.¹³⁰

CONCLUSION

The allegations that former President Ghani and his senior advisors fled Afghanistan aboard helicopters with millions in cash are unlikely to be true. The hurried nature of their departure, the emphasis on passengers over cargo, the payload and performance limitations of the helicopters, and the consistent alignment in detailed accounts from witnesses on the ground and in the air all suggest that there was little more than \$500,000 in cash on board the helicopters. Millions of additional dollars nearly made it on board, though some or all of this money may have been former President Ghani's legitimately earned and declared money.

That being said, it remains a strong possibility that significant amounts of U.S. currency disappeared from Afghan government property in the chaos of the Taliban takeover—including millions from the presidential palace and the NDS vault. Attempts to loot other government funds appear to have been common. Yet with Afghan government records and surveillance videos from those final days likely in Taliban hands, SIGAR is unable to determine how much money was ultimately stolen, and by whom.

¹²⁶ SIGAR is pursuing three major criminal investigative initiatives, collectively referred to as the "Follow the Money" Capital Flight Project. The project focuses on the flight of assets and capital by Afghans, including senior government officials and the politically connected, upon the collapse of the government.

¹²⁷ Steve Coll, *Directorate S: The CIA and America's Secret Wars in Afghanistan and Pakistan* (Penguin Press: New York, NY, 2018), pp. 122–125; Astri Suhrke and Antonio De Lauri, "The CIA's 'Army': A Threat to Human Rights and an Obstacle to Peace in Afghanistan," Watson Institute for International Affairs, August 2019.

¹²⁸ Letter from Reid H. Weingarten on behalf of President Ashraf Ghani, in response to SIGAR questions, July 28, 2022.

¹²⁹ This official claimed that as recently as 2011, the CIA had provided the bulk of NDS' budget, but that number had gradually decreased to nearly zero by the time the government had collapsed. Instead, over the last decade, the CIA's funding for its own Afghan paramilitary groups had been shifted off-budget, meaning the CIA bypassed NDS coffers to fund these groups, including the well-known Counter-Terrorism Pursuit Teams and Khost Protection Force. Former senior Afghan official, SIGAR interview.

¹³⁰ Former senior Afghan official, SIGAR interview.

APPENDIX I: SIGAR LETTER TO FORMER AFGHAN PRESIDENT ASHRAF GHANI, AND RESPONSE FROM PRESIDENT GHANI



SIGAR

Office of the Special Inspector General
for Afghanistan Reconstruction

John F. Sopko
Special Inspector General

March 14, 2022

His Excellency

Ashraf Ghani

President of the Islamic Republic of Afghanistan

Dear Mr. President,

Thank you very much for graciously considering to be interviewed for the evaluation SIGAR is conducting at the request of the U.S. Congress. Thus far we have interviewed numerous former colleagues of yours as well as U.S. and international donor officials, including ambassadors, generals, and senior government officials. However, I believe your views and experience as President of Afghanistan are essential to understanding the events leading up to August 2021 and will be of great interest worldwide.

I had hoped that you and I would have had the opportunity to meet in person to discuss in an informal setting the many issues we have had frank conversations about over the nearly a decade we have known each other. Unfortunately, I realize that such a meeting is complicated now but hope that sometime in the future we will have that opportunity. As a poor substitute, I have enclosed a number of written questions pertaining to the U.S. reconstruction effort in Afghanistan, the U.S.-Taliban peace negotiations, and the events leading up to and including the Taliban takeover. If there is anything of importance that I have omitted, please do not hesitate to expand on these subjects as you see fit. Should you require further clarification of any of these questions, please let me know.

Again, I am sorry we cannot get together in person, but hope this missive finds your family safe and healthy. My best to you and your wife.

Sincerely,

John F. Sopko
Special Inspector General
for Afghanistan Reconstruction

Enclosure

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Questions for President Ghani

Collapse of the Afghan Government

1. What do you see as the most important factors contributing to the collapse of the Afghan government?
2. What was your vision for Afghanistan and how was this vision compatible with a more "inclusive" approach that inevitably would require compromise with the Taliban or other political actors?
3. You have spoken of South Korea and Singapore as models. What attributes of these (or other cases) did you find helpful for how you approached the challenges of Afghanistan?
4. Can you describe the Afghan Government's negotiating position (beginning with your February 28, 2018 meeting of the Kabul Process Peace and Security Cooperation in Afghanistan in which you offered to negotiate with the Taliban without preconditions if they would end their ties with terrorism and respect the Afghan constitution) and how this position changed throughout the process? What information did you rely upon most to inform you of the Afghan Government's relative strength vis-à-vis the Taliban? How did this information impact the Afghan Government's negotiating position?
5. We have heard that you reviewed hundreds of peace agreements. Did any stand out at the time as particularly relevant to the situation of Afghanistan? If so, what attributes of the other peace agreement/process did you find most helpful?
6. Please describe how you perceived and reacted to Secretary of State Pompeo's threats to withhold significant U.S. funds [(1) \$160 million threatened in September 2019 and (2) \$1 billion in unspecified funds threatened in May 2020]. Did you view these threats with serious concern? If yes, why? If no, why not?
7. Your former national security advisor has said publicly that "we [the senior leadership of the Islamic Republic] didn't read the writing on the wall. The writing on the wall was that a withdrawal will take place no matter what." Do you agree with that statement? Can you elaborate on what sources of information you consulted to form your view of U.S. government intentions leading up to the final withdrawal?
8. Please describe the differences, if any, in cooperation and information sharing with the U.S. government during the Trump and Biden administrations and whether or not such contributed to the ultimate collapse of the Afghan government.
9. Please describe the sharing of information concerning the negotiations and final agreement between the U.S. government and the Taliban with you and your government and its contribution, if any, to the ultimate collapse of the Afghan government.
10. Did you and your government believe the Biden administration would ultimately amend or scrap the U.S. – Taliban deal and give your government more time to turn things around on the battlefield or conclude negotiations with the Taliban? What, if any, impact did this belief have on the sudden collapse of the Afghan government?
11. Were you aware of any conditions that the Taliban agreed to in the 2020 agreement that they did not comply with that you or your government raised with the U.S. government and what was the ultimate result of that discussion?
12. What role did you see corruption as a factor contributing to the collapse of the Afghan government?
13. Please describe the situation that led to your departure from Afghanistan on August 15, 2021. Did you consult with the U.S. government beforehand and if so, please describe the discussion?

Collapse of the Afghan National Defense and Security Forces (ANDSF)

1. What do you think are the major factors that contributed to the collapse of the Afghan National Defense and Security Forces (ANDSF)?
2. What if any impact did the “Inherent Law” enacted in 2018 contribute to the improvement or collapse of the ANDSF?
3. You have publicly referred to the Ministry of Interior as one of the most corrupt ministries of the Afghan government. You have also publicly referenced corruption within the Ministry of Defense. Did corruption erode ANDSF capabilities and readiness, and, if so, how?
4. SIGAR and other agencies have highlighted the issue with ghost soldiers and police. How much of an issue was this during your presidency? What actions did the Afghan government take to mitigate the risks of ghost soldiers and police in the units?
5. How did the Afghan government implement a merit-based system when determining the appointment of ANDSF corps commanders, and ministers and deputy ministers in the MOD and MOI?
6. What was your vision for an Afghan National Police service and do you believe the international community developed a police force in that image?
7. Do you believe the Afghan government was properly consulted and informed about U.S. and international efforts to develop ANDSF capabilities?
8. Do you believe the Afghan government had ownership of the ANDSF in terms of force design, basing structure, programs used to track the movement of personnel and equipment, and military plans? Did the nature of Afghan ownership change over time?
9. How did the release of Taliban detainees negotiated through the U.S.-Taliban agreement impact the battlespace and the ANDSF’s ability to combat the Taliban?
10. Did the rotation of U.S. civilian and military leaders impede your ability to develop the necessary long-term plan for securing Afghanistan?
11. We have reports that ANDSF units were without food, water, ammunition, and equipment necessary to survive against a Taliban offensive. If true, what led to this situation and what, if any, discussions did you have with the U.S. government about this situation?
12. We have been told that ANDSF personnel feared that if they were killed in battle the Afghan government would not provide benefits or support to their families and that this impacted their risk calculus. Do you agree with this perspective? What actions did the Afghan government take to provide martyr benefits to the families of killed ANDSF members?
13. Were the messages you received about the United States’ commitment to supporting the Afghanistan government consistent among the U.S. civilian and military leaders you met with? If not, what were the differences in the messages you received?
14. Over the 20-year period from 2001 to 2021, was the Afghan and U.S. governments successful in developing a unified national identity for a national security force? What do you believe were the factors that determined whether an ANDSF unit engaged in heavy combat against the Taliban, negotiated a surrender, or just abandoned their positions?
15. Where do you believe the U.S. government succeeded and failed in helping the Afghan government develop an effective, sustainable, and independent ANDSF?
16. Following the signing of the U.S.-Taliban agreement in February 2020, what was the Afghan government’s national security strategy for securing the country following the drawdown of the U.S. military and its contractors? What information were you provided about how the U.S. military would engage the Taliban in Afghanistan or support the ANDSF?

17. It is our understanding that the U.S. dropped over 7,400 bombs in 2019, the highest since at least 2009. In 2020, it is our understanding, U.S. airstrikes decreased by 80%, and in 2021 an even larger decrease occurred when compared to 2019 numbers. Were you or your government aware of these changes and consulted about them? What, if any, impact did these changes have on the ultimate collapse of the ANDSF in your opinion?
18. It is our understanding that the 2020 U.S.-Taliban peace agreement included secret annexes dealing with U.S. rules of engagement. What is your understanding of those annexes and the change, if any, in the rules of engagement as a result of this 2020 agreement? Were you or any of your senior advisors shown or consulted about these annexes or the rules of engagement? If not, what if anything, was the impact of these annexes and any new rules of engagement on the ultimate collapse of the ANDSF?
19. From July 2021 to August 2021, as the Taliban were capturing provinces across the country, what advice did the U.S. government provide to you or your national security leadership on ways to secure Kabul and other territory?
20. You stated in 2021 that the ANDSF was capable of securing Afghanistan without U.S. support. On what did you base this belief?
21. Please describe the U.S. government's consultation with you and your government since you were elected and how it could have been improved.
22. Following the collapse of the Afghan government, your former acting minister of finance offered that between 83 and 87% of the Afghan security forces were "ghosts." Do you have any reaction to this claim? Do you consider this claim credible? If so, when do you believe the "ghost" issue reached a critical level?

Afghans at Risk Due to Taliban Return to Power

1. What specific steps during the peace negotiations did the Afghan government take or propose to the Taliban and international community to safeguard civil society, including Afghan women and girls' rights, health and education achievements, and the operation of civil society organizations?
2. What do you see in the future of the healthcare, education, women and girls' rights, civil society organizations, and free press /journalism under Taliban rule?
3. Was there a point at which the Afghan Government took measures to protect and secure the identities of government personnel (such as wiping computer data, personally identifiable information documents, biometrics, etc.)? Were steps taken to prevent the Taliban from tracking down your staff?

Allegations of Theft

Many former Afghan officials have described to us how guards with the Presidential Protective Service looted a large cash reserve that was housed inside your residence. This apparently happened shortly after you departed for Uzbekistan. We will be describing these activities and others in an upcoming public report about theft by government officials as the city fell. Likewise, we are aware of multiple press reports alleging the theft of Afghan government funds by Afghan government officials, including yourself. We feel it would be unfair if we did not give you a chance to comment on some of these allegations.

1. Was there a stockpile of cash inside or in the vicinity of your residence?
2. If so, how much was there and what was the source of this money?
3. What was it being used for?
4. Approximately how much cash remained by the time you departed?

5. Do you have any knowledge of an emergency cash fund for the Palace, commonly referred to as the “Code 91” fund, what it was being used for, its amount, and what happened to these funds?
6. Do you have any knowledge of any theft of these or other Afghan government funds?
7. Do you have any knowledge of any unauthorized commingling or theft of a “bridge payment” from the Central Bank of Afghanistan to the Afghan Ministry of Finance by former Central Bank officials including Ajmal Ahmady or any other former official of the Afghan government?
8. Do you have any knowledge of any illegal or unethical activity related to an approximately \$180 million mining contract approved by the Afghan cabinet prior to the collapse of the government?
9. What role, if any, did Ajmal Ahmady have in that mining contract?
10. Do you have any knowledge of any bulk cash transfers of Afghan government funds from Kabul via HKIA to Abu Dhabi and/or Turkey in the Spring and Summer of 2021 prior to the August collapse of the Afghan government?
11. Do you have any knowledge of the cancellation of the UK-Kuwaiti ground security contract at HKIA and the awarding of a new security contract with an Abu Dhabi contractor shortly before the fall of the Afghan government?
12. Do you have any other information you would like to share with us concerning the theft or misuse of Afghan government or U.S. funds?

U.S.-Taliban Peace Negotiations and Afghan Government Relations with the United States

1. How did you view the U.S.-Taliban agreement of February 2020? Please describe the U.S. government's consultation with the Afghan government before this agreement was reached. What impact do you believe the agreement had on the survivability of the Afghan government and the ANDSF?
2. What impact, if any, do you believe the November 17, 2020 announcement that the U.S. would draw down its forces to 2,500 by January 15, 2021, had on the survivability of your government and the ANDSF?
3. With the change in U.S. administration following the November 2020 U.S. presidential election, did you anticipate a change in approach to U.S. policy toward Afghanistan and if so, did that impact your decision-making as president, including on matters of national security and peace negotiations with the Taliban?
4. On March 7, 2021, Secretary of State Blinken reportedly shared his concern with you that the “security situation in Afghanistan would worsen and the Taliban could make rapid territorial gains.” Did he share that concern with you? If so, did you agree with that assessment at the time? Why or why not?
5. On April 14, 2021, President Biden announced that all U.S. forces would withdraw from Afghanistan by September 11, 2021. Were you or your government adequately consulted before this decision was made and the statement issued? How prepared was the Afghan government and the ANDSF for such an eventuality? What impact did the announcement of a date certain for a complete U.S. withdrawal have on the decision-making, morale, and survivability of the Afghan government and ANDSF? Do you believe there are steps that the United States and its coalition allies could have taken between President Biden’s announcement and August 2021 that would have increased the chances of the Afghan government and ANDSF surviving?
6. With the benefit of hindsight, going back to the start of U.S. negotiations with the Taliban, and with the understanding that both President Trump and President Biden were fully committed to withdrawing all U.S. forces by a date certain, what steps, if any, do you think the U.S. government and military could have taken to help avoid the outcome that befell Afghanistan in August 2021?

July 28, 2022

Via Email

The Honorable John F. Sopko
Special Inspector General for Afghanistan Reconstruction
2530 Crystal Drive
Arlington, VA 22202

Re: **Ashraf Ghani**

Dear Inspector General Sopko:

We represent President Ashraf Ghani. We are writing in response to your March 14, 2022 letter enclosing a number of written questions directed to President Ghani.¹ President Ghani is immensely proud of the work that he accomplished during his tenure as President of Afghanistan, and has always carried out his duties with honor and integrity.

1. Background

To frame the responses below, it is helpful to understand the President of Afghanistan's role and responsibilities in addition to the process for approving and executing spending requests during President Ghani's tenure in office. Under the 2004 Afghanistan Constitution, the President is not delegated any authority or responsibility for overseeing or executing day-to-day government spending. Therefore, it should come as no surprise that, during his tenure, President Ghani was not responsible for executing, handling, or auditing government spending.

President Ghani did not handle or receive government cash payments while in office, nor did he audit government cash payments. President Ghani was ultimately responsible for the process of submitting a budget to the legislature and, once the budget was approved, signing it into law, and he is proud of the increase in development spending that he presided over. But he did not have direct access to money appropriated in the national budget. During President

¹ The information provided is based on the limited information in our possession.

Ghani's tenure, government spending was approved as part of a national budget passed by Afghanistan's National Assembly and spending outside the national budget was managed by Afghanistan's international partners. To execute a payment provided for under the budget, a ministry, provincial government, or other government office was required to obtain written, initialed approval from the Ministry of Finance. President Ghani did not initial regular, non-emergency budget items. From there, the Da Afghanistan Bank (DAB) released funding to the relevant governmental office without involvement from President Ghani. *See generally* Attachment A, Public Finance & Expenditure Management Law.

Government spending was supervised and reviewed by auditors from the Ministry of Finance and the Supreme Audit Office. President Ghani was not involved in such oversight himself. In fact, President Ghani provided the US government with full cloud access to the Afghan Financial Management System (AFMS) which includes Ministry of Finance and DAB transaction data. In addition, at President Ghani's direction, a group of Australian experts also created a comprehensive database of all public expenditure in Afghanistan from 2002 to 2021 as part of a national digitization strategy. And Afghanistan's approved budgets from Afghan calendar years 1383 – 1400 are still available on the website of the budget department of the Ministry of Finance.²

We understand that SIGAR may have access to this data, which should allow it to conduct a comprehensive audit of government spending during President Ghani's tenure and independently answer many of the questions addressed to President Ghani.

2. Cash in the Presidential Residence

Several of the questions posed in your letter reference "a stockpile of cash inside or in the vicinity of" President Ghani's residence. Before returning to Afghanistan in December 2001, President Ghani spent twenty four years in the United States where he was professionally well-established. He had a permanent appointment equivalent to university tenure at the World Bank, where he earned an annual salary. After assuming office, President Ghani and Mrs. Ghani disclosed their assets on an Asset Declaration Form. The September 2015 Asset Declaration Form lists over \$5 million in cash from the sale of property in Lebanon and personal property in the United States in addition to funds from other sources, such as a salary from the Institute for State Effectiveness, a pension from the World Bank, and apartment rent. *See* Attachment B, September 2015 Asset Declaration.³

President and Mrs. Ghani relocated to the Presidential Palace after President Ghani took office in September 2014, bringing with them their cash and other assets, documents and book

² *See* <https://www.budgetmof.gov.af/index.php/en/2012-12-06-22-51-13/national-budget>.

³ These numbers are based on the September 2015 exchange rate to US dollars.

collection. President Ghani had publicly announced his commitment to using his personal cash assets to establish a foundation in his ancestral village including a Presidential Library, an Islamic Studies Center, and an agricultural center. Unfortunately, the great majority of their personal belongings, including their cash assets (as reflected in Attachment B), computers and documents, were left behind when they left Afghanistan on August 15, 2021, and eventually stolen.

3. Emergency Cash Fund

Your letter asks President Ghani whether he has “any knowledge of an emergency cash fund for the Palace, commonly referred to as the ‘Code 91’ fund, what it was being used for, its amount, and what happened to these funds.” The premise of this question reflects a misunderstanding of Afghanistan’s budgetary process. Code 91 for Emergencies was an established component of the Afghanistan budget with written procedures for its use and mandated auditing of its expenditures by the Ministry of Finance and Supreme Audit Office. Code 91 for Emergencies was not a cash fund that was available for the President’s use. Instead, spending under Code 91 for Emergencies was subject to a robust approval process that involved a number of individuals from multiple government entities. Only once requisite approvals were obtained could DAB release funds to the requesting government ministry or office.

President Ghani did, however, establish an inter-ministerial committee in February 2020 to enhance oversight and transparency of funds used from Code 91 (and Code 92, a separate emergency budget provision). *See* Attachment C, Report on Evaluation Committee on the Usage of Reserve Funds of Policy Code 91 and Emergency Code 92. As a result of the Committee’s work to increase accountability, Code 91 expenditures decreased, as did overall inefficiencies associated with these funds. *See* Attachment C.

4. Bridge Payment

Your letter also asks whether President Ghani had “any knowledge of any unauthorized commingling or theft of a ‘bridge payment’ from the Central Bank of Afghanistan to the Afghan Ministry of Finance by former Central Bank officials or any other former official of the Afghan government.” President Ghani has no such knowledge.

President Ghani does not believe that any such “bridge payment” from DAB to the Ministry of Finance was ever executed, although preliminary discussions regarding such a payment may have occurred. As part of a package of assistance to developing countries during the COVID-19 pandemic, Afghanistan was scheduled to receive approximately \$450 million from the International Monetary Fund (IMF) on August 23, 2021. To help ensure that the Ministry of Finance was able to pay government salaries and expenses while the IMF payment was pending and avoid market panic, President Ghani, along with the DAB Governor and senior Ministry of Finance officials, explored the possibility of a “bridge payment” from DAB to the Ministry of Finance. Indeed, given DAB’s role as Afghanistan’s lender of last resort and its

ability to provide loans for periods of up to three months (*see* Attachment A, Public Finance & Expenditure Management Law, art. 18), President Ghani believed that it would have been reckless to not at least explore the possibility of a “bridge payment” under the circumstances. However, the contemplated “bridge payment” did not come to fruition due to the Taliban takeover of Afghanistan.

5. Mining Contract

Your letter further inquires whether President Ghani had knowledge of “any illegal or unethical activity related to an approximately \$180 million mining contract approved by the Afghan cabinet prior to the collapse of the government.” President Ghani is not aware of the Afghan government considering such a contract, much less awarding one. President Ghani has no knowledge of such a contract ever being submitted to the High Economic Council or the Procurement Commission for initial review or to the Afghan Cabinet for consideration. President Ghani cannot state with certainty that such a contract was never discussed at the Ministry of Mining and Petroleum because he is not privy to all internal discussions within the Ministry. But on June 27, 2021, the Cabinet did authorize the Ministry to initiate the call for bids for three mines. The three mines under consideration during that period were a talc mine in Nangarhar and Kapisa provinces, a gold and copper mine in Ghazni province, and a cement mine in Herat province. *See* Attachment D, Cabinet Agenda. However, due to security conditions, the call for bids did not take place.

An investigation by the Legal Office of the Presidency found allegations regarding this purported contract to be baseless. President Ghani attributes this false allegation to Russian or other propaganda.

6. Bulk Cash Transfers

Your letter also questions whether President Ghani has “any knowledge of any bulk cash transfers of Afghan government funds from Kabul via HKIA [Hamid Karzai International Airport] to Abu Dhabi and/or Turkey in the Spring and Summer of 2021 prior to the August collapse of the Afghan government.” President Ghani is not aware of any such cash transfers and had only limited contact with HKIA regarding unrelated topics such as senior government official travel.

Although to the best of his knowledge, President Ghani does not recall any bulk cash transfers, the possibility of such transfers seems implausible for a number of reasons. First, the question mistakenly assumes that the highly sophisticated Abu Dhabi and Turkish airports lacked necessary controls to prevent money laundering and the operation of transnational criminal networks.

Second, the question suggests that Afghan government ministries and offices had access to “bulk cash funds” in hard currency. The opposite is true. The only Afghan government agency

with hard currency reserves was the National Directorate of Security (NDS), which held reserves provided by, and managed by, the United States and international partners. The deployment of these NDS funds was at the sole discretion of each NDS Director, and these funds were not audited by the Afghan government.

Third, the opening of bank accounts by government organizations required Ministry of Finance approval. The three state-owned banks were under Ministry of Finance and DAB supervision, and most of the hard currency reserves of Bank-e-Millie were deposited in interest-earning accounts abroad.

It is worth noting that SIGAR is in a position to independently investigate such allegations through footage from a network of cameras installed at and in the vicinity of HKIA and records from Resolute Support Mission, which monitored all flights to and from HKIA.

7. Cancellation of Security Contract

Your letter inquires about “the cancellation of the UK-Kuwaiti ground security contract at HKIA and the awarding of a new security contract with an Abu Dhabi contractor shortly before the fall of the Afghan government.” In actuality there were two existing contracts at HKIA before the awarding of a new security contract to Abu Dhabi based GAAC Solutions — one with the Olive Group, a US based contractor, for security, and another between National Aviation Service (NAS), a Kuwaiti contractor, and Ariana Airlines, for ground logistics.

The Olive Group repeatedly failed to perform its contractual obligations, including failing to install scanners and guarantee the right of its employees to an eight-hour work day, while engaging in (and charging the Afghan government for) unnecessary work. Following a final warning and the issuance of a \$1 million fine, the Olive Group was issued a notice of termination. As part of the termination process, it was discovered that members of parliament and government were beneficial owners of the Olive Group, which appeared to constitute an inherent conflict of interest.

Meanwhile, the Ariana-NAS ground-logistics contract was the subject of continuous complaints from other airlines regarding poor service and lack of accountability. Once the contract was produced and reviewed by the Legal Office of the Presidency, it was terminated for breach of contract. The Chairman of NAS sought to meet with President Ghani at Davos regarding the contract, but the request was denied because the contract was under review by the appropriate government authorities at the time.

After Afghanistan’s experience with the Olive Group and NAS, the government sought a more reliable and established contractor to oversee HKIA. In addition, because Dubai was the most important international hub for commercial air traffic with HKIA, the Afghan government targeted a security contractor that could meet the rigorous security standards of the United Arab Emirates (UAE). Following news of a potential Abu Dhabi Fund grant of approximately \$120

million to implement Afghanistan's national digitization program, GAAC Solutions expressed interest in the comprehensive management of HKIA and began negotiating a contract with Afghan government officials, including Afghanistan's Ambassador to the UAE. Additionally, the Afghan government was negotiating with the UAE regarding investment packages to construct new passenger terminals, hotels, and cargo terminals at airports in Afghanistan using a public-private partnership model. A contract with GAAC Solutions appears to have been recently signed by the Taliban.

* * * * *

President Ghani is immensely proud of his tenure as President of Afghanistan in the face of historic challenges. By all measures, accountability and transparency significantly and systematically increased during his Presidency. President Ghani welcomes a full and comprehensive investigation of the Afghanistan government during his tenure, which he is confident will show that he acted with the utmost integrity during his time in office and through his departure last August.

We have provided the above information in the hope that we can continue to dialogue with your Office. Please let us know if you have any questions about this information or if you wish to discuss these issues further. We welcome the opportunity to engage with SIGAR.

Sincerely yours,



Reid H. Weingarten
Steptoe & Johnson LLP

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ACKNOWLEDGMENTS

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The mission of the Special Inspector General for Afghanistan Reconstruction (SIGAR) is to enhance oversight of programs for the reconstruction of Afghanistan by conducting independent and objective audits, inspections, and investigations on the use of taxpayer dollars and related funds. SIGAR works to provide accurate and balanced information, evaluations, analysis, and recommendations to help the U.S. Congress, U.S. agencies, and other decision-makers to make informed oversight, policy, and funding decisions to:

- improve effectiveness of the overall reconstruction strategy and its component programs;
- improve management and accountability over funds administered by U.S. and Afghan agencies and their contractors;
- improve contracting and contract management processes;
- prevent waste, fraud, and abuse; and
- advance U.S. interests in reconstructing Afghanistan.

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