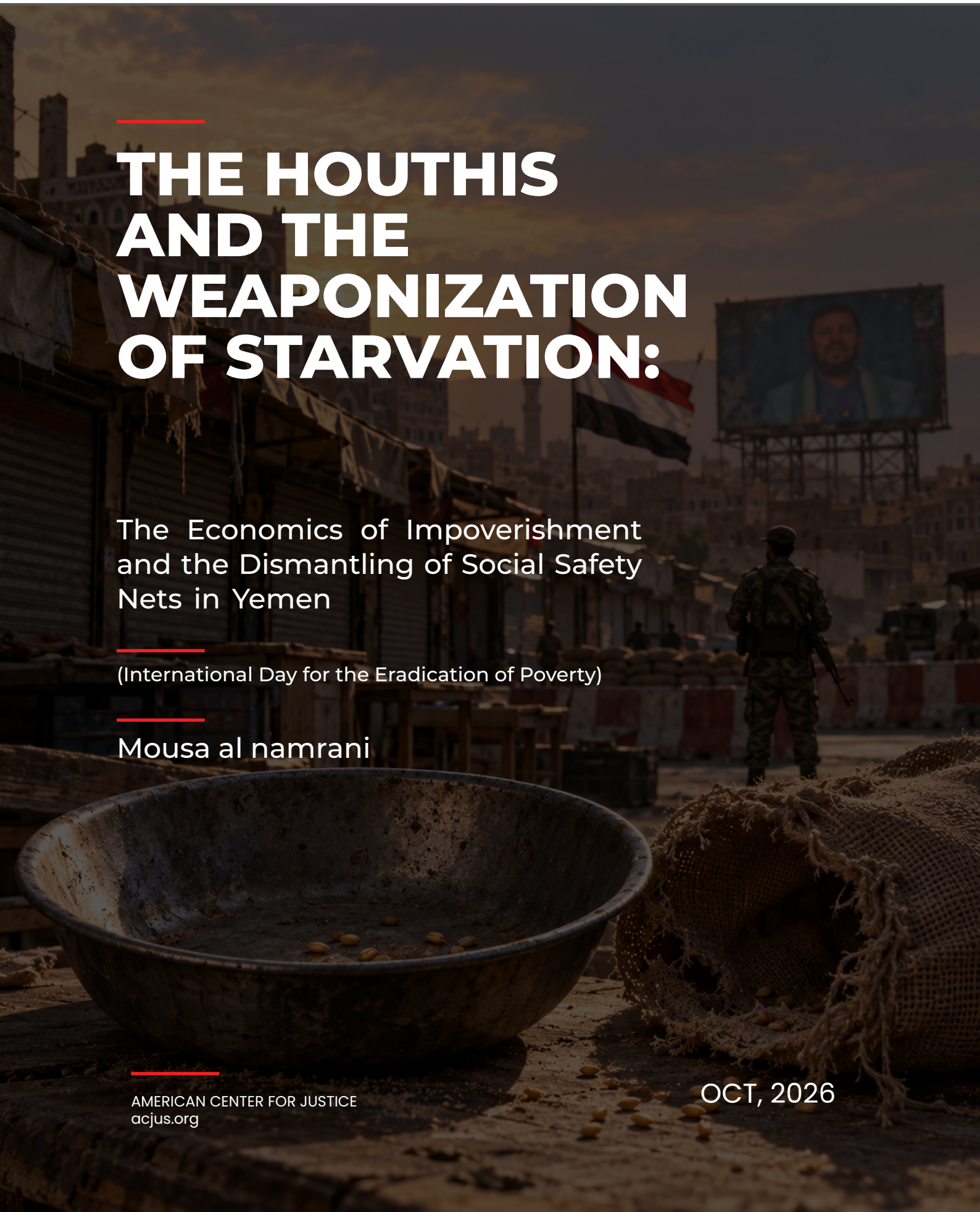
AMERICAN CENTER FOR JUSTICE



THE HOUTHIS AND THE WEAPONIZATION OF STARVATION:

The Economics of Impoverishment and the Dismantling of Social Safety Nets in Yemen

(International Day for the Eradication of Poverty)

Mousa al namrani

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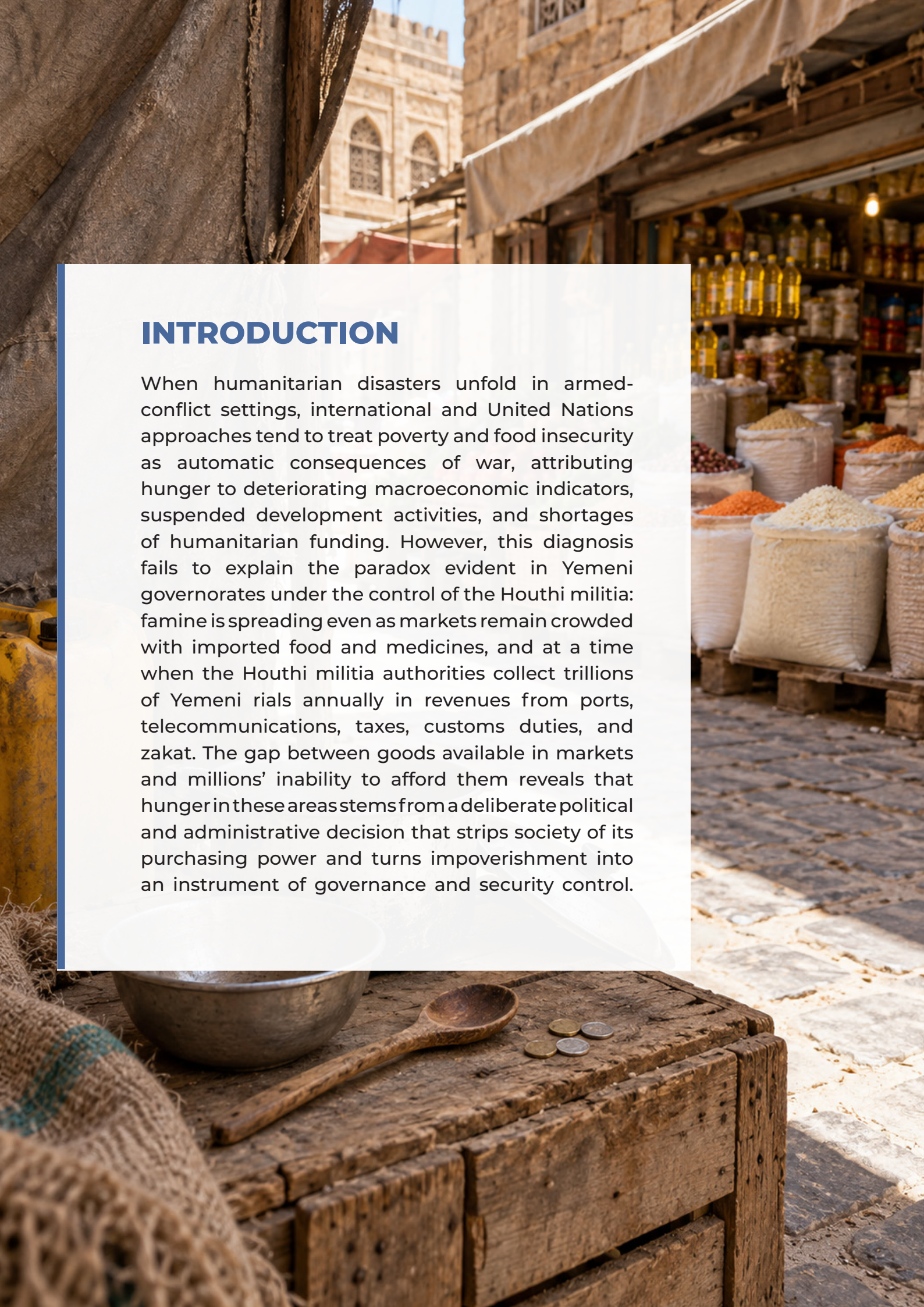
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INTRODUCTION

When humanitarian disasters unfold in armed-conflict settings, international and United Nations approaches tend to treat poverty and food insecurity as automatic consequences of war, attributing hunger to deteriorating macroeconomic indicators, suspended development activities, and shortages of humanitarian funding. However, this diagnosis fails to explain the paradox evident in Yemeni governorates under the control of the Houthi militia: famine is spreading even as markets remain crowded with imported food and medicines, and at a time when the Houthi militia authorities collect trillions of Yemeni rials annually in revenues from ports, telecommunications, taxes, customs duties, and zakat. The gap between goods available in markets and millions' inability to afford them reveals that hunger in these areas stems from a deliberate political and administrative decision that strips society of its purchasing power and turns impoverishment into an instrument of governance and security control.

This study is necessary to move beyond merely documenting the number of people affected by hunger, and instead subject the underlying economic system to legal and human rights scrutiny. It seeks to analyze the administrative and legislative mechanisms that generate and sustain such conditions. Since seizing control of state institutions, the Houthi militia has engineered a coercive economy that deprives citizens of financial independence. They have withheld salaries from public sector employees, appropriated retirees' savings and social welfare funds, set up internal customs checkpoints that increase the prices of food and medicine, used the judiciary to seize private business assets, and monopolized both charitable activities and international aid. These interconnected measures serve a specific political and military purpose: they deplete the population's vital energy in the struggle for daily survival, undermine its capacity for civic organization and peaceful resistance, and make military recruitment camps the only available avenue for obtaining income and basic sustenance.

The study, "The Houthis and the Weaponization of Starvation: The Economics of Impoverishment and the Dismantling of Social Safety Nets," published by the American Center for Justice (ACJ) to mark the International Day for the Eradication of Poverty (17 October),[1] aims to fill a research and human rights documentation gap by establishing a direct causal link between the militia's administrative and financial decisions and the deprivation of millions of Yemeni families of basic necessities. It examines the legal texts, regulations, and judicial rulings issued by the Houthi militia to legitimize levies and asset confiscations, treating these documents as criminal evidence that demonstrates both the material elements and prior criminal intent necessary to establish the war crime of using starvation of civilians as a method of warfare. This approach seeks to reorient international human rights efforts from merely managing the consequences of hunger through emergency relief, toward demanding the dismantling of the administrative and financial systems that produce poverty and pursuing accountability for those who designed and implemented them through financial and judicial mechanisms before international justice.

1 The United Nations General Assembly designated 17 October as the International Day for the Eradication of Poverty through Resolution 47/196, adopted on 22 December 1992. https://www.un.org/ar/observances/poverty-day



EXECUTIVE SUMMARY

This study examines how the Houthi militia has established administrative, financial, and judicial systems in areas under its control to turn poverty into a tool of governance and systematic political subjugation. Field data and regulatory documents collected by the American Center for Justice (ACJ) demonstrate a direct causal link between the militia's decisions and the deprivation of millions of Yemeni families of their basic means of livelihood, driving them into severe food insecurity.

THE HOUTHI SYSTEM OF IMPOVERISHMENT FUNCTIONS THROUGH THREE INTERCONNECTED PILLARS:

Confiscation of Public-Sector Wages and the Erosion of Society's Financial Independence: Since the final quarter of 2016, the Houthi militia has withheld salaries from more than 1.2 million government employees, who collectively support around eight million people, while also seizing the cash reserves and investment assets of pension and social insurance funds. This deliberate withholding of wages has occurred alongside the militia's collection of trillions of Yemeni rials annually in revenues from the ports of Hudaydah, the telecommunications sector, taxes, and customs duties—all of which are funneled toward financing its military operations and security apparatus. These actions have resulted in the decimation of the middle class, the depletion of professional expertise within state institutions, and the use of economic deprivation as a tool of coercion, driving young people and children into recruitment camps in exchange for food and financial incentives.

Fiscal and Judicial Predation and the Militarization of Supply Chains: The Houthi militia has established a network of internal land customs checkpoints between governorates, imposing double customs duties ranging from 50% to 100% on food and medicine. In 2020, it issued Decision No. 100, which imposed a khums levy (20%) on wealth and economic activities for the benefit of a specific lineage-based group. These measures have been accompanied by a monopoly over the import and pricing of petroleum products, a ban on the circulation of the official national currency, and the imposition of fees on domestic money transfers—actions that have eroded nearly half the value of household savings and remittances from expatriates. Simultaneously, the Houthi militia has exploited the Specialized Criminal Court and the "Judicial Custodian" apparatus to confiscate hundreds of private companies, banks, and factories, replacing them with commercial cartels affiliated with its leaders. As a result, necessities such as bread and medicine have become vehicles for extracting revenue to finance the war machine.

Dismantling Social Safety Nets and Politicizing Humanitarian Aid: The Houthi militia has seized the funds of the Social Welfare Fund and suspended its cash assistance, which previously covered 1.5 million cases involving the poorest households, persons with disabilities, and orphans. It has also prohibited independent charitable activities by monopolizing zakat collection and diverting its proceeds to the front lines. Furthermore, it has placed United Nations and international humanitarian assistance

under security oversight through the Supreme Council for the Management and Coordination of Humanitarian Affairs and International Cooperation (SCMCHA) and alternative administrative structures within its foreign ministry. These mechanisms have been used to manipulate beneficiary lists, deny assistance to households perceived as disloyal, financially extort humanitarian organizations, and abduct dozens of United Nations and humanitarian aid workers.

From a legal perspective, the study concludes that these policies satisfy the elements of the war crime of using starvation of civilians as a method of warfare, depriving civilians of objects indispensable to their survival, and obstructing relief supplies, pursuant to Article 14 of Additional Protocol II to the Geneva Conventions, Rule 53 of customary international humanitarian law,2 Article 8(2)(e)(xix) of the Rome Statute of the International Criminal Court, and United Nations Security Council Resolution 2417. These acts also constitute crimes of systematic pillage, persecution, and collective punishment, and represent grave violations of the minimum core obligations enshrined in the International Covenant on Economic, Social and Cultural Rights (Articles 6, 7, 9, 11, and 12).

The study proposes a procedural roadmap calling on the United Nations Security Council and the 2140 Sanctions Committee to designate the militia's economic and judicial leaders, along with the monopolistic business networks affiliated with them, for international sanctions. It urges the UN Special Envoy to establish a binding international monitoring mechanism to ensure that revenues from the ports of Hudaydah and the telecommunications sector are allocated to salary payments and to close internal customs checkpoints.

The study also calls on United Nations agencies to free humanitarian operations from Houthi militia control and transition fully to digital cash transfer systems and biometric registration. Finally, it demands the establishment of an international criminal investigation and accountability mechanism to trace looted funds and assets and return them to their rightful owners.

2 International Committee of the Red Cross (ICRC), Customary International Humanitarian Law Study, Rule 53: The use of starvation of the civilian population as a method of warfare is prohibited in both international and non-international armed conflicts. https://ihl-databases.icrc.org/ar/customary-ihl/v1/rule53

II. THE PRODUCTION OF IMPOVERISHMENT AS AN INSTRUMENT OF GOVERNANCE AND SUBJUGATION

International and United Nations reports addressing Yemen's humanitarian crisis have consistently characterized poverty and food insecurity as inevitable consequences of the protracted armed conflict, deteriorating macroeconomic indicators, and declining external humanitarian funding. While these factors validly explain part of the overall deterioration, this characterization overlooks the political and administrative actor that engineers, manages, and exploits the persistence of poverty in the governorates under the control of the Houthi militia.

A close examination of the Houthi militia's administrative decisions, financial legislation, and judicial rulings since 2015 reveals a fundamental transformation in the function of poverty: impoverishment, within the Houthi militia's governing doctrine, has become a technique of governance and an instrument of security and social control. When an armed group takes control of state institutions and sovereign resources, collects trillions of Yemeni rials in taxes, customs duties, and revenues from fuel, telecommunications, and zakat, and then makes a deliberate and sustained decision to withhold public-sector salaries, plunder retirees' savings, increase the cost of food and medicine, and dry up sources of charitable funding, it engages in a process of "systematic impoverishment engineering" with specific political and military objectives.

The Houthi militia recognizes that a society with financial independence, a middle class receiving regular wages, and an independent commercial and charitable sector necessarily possesses the capacity for civic organization, rights advocacy, and resistance to authoritarian projects. Accordingly, the Houthi militia has sought to strip the population of all independent sources of income and social protection, plunging Yemeni families into a daily struggle for basic sustenance and creating a state of pervasive livelihood insecurity that drains the society's vital energy. This, in turn, makes the survival of individuals and their families contingent upon submission to Houthi authority, while facilitating their recruitment into the militia's networks of enlistment and allegiance, often without meaningful choice or compensation beyond necessities.

III. CONCEPTUAL AND METHODOLOGICAL FRAMEWORK OF THE STUDY

1. Conceptual Framework: Deconstructing the "Weaponization of Starvation" and the Expropriation of Economic Entitlements

The study's theoretical and economic foundation rests on the "expropriation of economic entitlements" approach to analyzing famines and livelihood crises arising from armed conflicts. Acute hunger in areas under the control of the Houthi militia persists even as local markets remain stocked with imported food and medicines. This indicates that the crisis stems fundamentally from the deliberate destruction of citizens' purchasing power, the nullification of their legally established financial entitlements, and the imposition of artificial financial and fiscal barriers that prevent them from accessing food through economic means.

The study adopts four operational concepts to dissect this system:

Systematic Impoverishment Engineering: An interconnected system of administrative, financial, and monetary decisions formally and institutionally issued by the Houthi militia to forcibly transfer wealth and income from citizens and the private sector to the war effort's coffers, thereby depriving society of the foundations of economic self-reliance.

Fiscal and Judicial Predation: The use of revenue-collection bodies (taxation, customs, zakat, and endowments) and politicized judicial institutions (the Specialized Criminal Court and the Judicial Custodian) to impose unconstitutional financial levies and confiscate private commercial and real estate assets, while replacing independent business owners with a monopolistic capitalist class affiliated with the militia.

Militarization of Supply Chains: The transformation of the distribution chain for essential commodities—including food, medicine, and fuel—from ports and entry points to retail outlets into a network of financial extraction and security checkpoints that finance military operations. Under this system, impoverished consumers effectively pay an indirect war tax on every commodity they purchase to sustain their lives.

Monopolization of Survival Channels: The dismantling of formal social safety nets, particularly the Social Welfare Fund, and community-based support systems, including charitable associations and direct zakat distribution, while placing international humanitarian assistance under the control of the militia's security apparatus. This enables the militia to exercise control

over the distribution of essential subsistence resources and use them as instruments of reward, punishment, and recruitment.

2. RESEARCH METHODOLOGY: ESTABLISHING CAUSATION AND CRIMINAL RESPONSIBILITY

To establish the elements of international crimes—particularly the material and mental elements of the crimes of starvation and systematic pillage—this study moves beyond the descriptive monitoring of poverty indicators and adopts a cross-referential investigative methodology that links administrative decisions to their impact on livelihoods through three principal tools:

1. **Documentary and Legislative Analysis of Militia Decisions: Examination** of the legal texts, regulations, and circulars issued by the Houthi militia authorities from 2015 through 2026, including the Executive Regulations of Zakat Law No. 100 of 2020; decisions establishing internal land customs checkpoints; circulars issued by the Central Bank branch in Sana'a concerning currency and transfer restrictions; regulations issued by the Supreme Council for the Management and Coordination of Humanitarian Affairs and International Cooperation (SCMCHA); and confiscation orders issued by the Specialized Criminal Court and the Judicial Custodian. This examination provides documentary evidence intended to establish criminal intent and institutional planning behind the impoverishment process.

2. **Financial Tracking of Supply Chains and Revenue Flows**: Tracing the additional financial costs imposed on food and medicine at each stage of the supply chain, including importation, inter-governorate transportation, local production, distribution, and monetary settlement. These costs are then cross-referenced with estimates of public revenues collected by the Houthi militia from ports, telecommunications, taxes, and zakat, in order to expose the fallacy of the claim that resource shortages justify the withholding of public-sector salaries.

3. **Criminal-Legal and Human Rights Assessment:** Assessing documented incidents and administrative decisions against the applicable rules of international humanitarian law, including the Geneva Conventions, their Additional Protocols, and customary international humanitarian law; international criminal law, particularly the Rome Statute of the International Criminal Court; United Nations Security Council Resolutions 2140, 2216, and 2417; and the International Covenant on Economic, Social and Cultural Rights, together with its General Comments.



CHAPTER (I):

THE CONFISCATION OF PUBLIC-SECTOR WAGES AND THE EROSION OF SOCIETY'S FINANCIAL INDEPENDENCE

Public-sector salaries in Yemen constitute the backbone of the local economic cycle and the first line of social protection for more than 1.2 million civil and military employees, whose incomes support approximately seven to eight million dependents—nearly one-third of the population. In an economy characterized by a weak private industrial sector, monthly spending by state employees serves as a primary driver of market liquidity, sustaining commercial activity in retail shops, transportation, real estate rentals, and small-scale professional and skilled services.

Since taking control of state institutions in Sana'a and the governorates under its control, the Houthi militia has deliberately dismantled this livelihood-supporting foundation through a calculated political and administrative decision to suspend salary payments beginning in the final quarter of 2016.[3] This has been accompanied by the confiscation of the cash reserves of pension and social insurance funds, even as the militia continues to collect trillions of Yemeni rials annually in tax and customs revenues, as well as revenues from the telecommunications, oil, and gas sectors.

A: MECHANISMS FOR WITHHOLDING WAGES AND PLUNDERING PENSIONERS' FUNDS

The Houthi militia has gradually stripped salaries of their status as a legally "acquired right," transforming them into a "conditional grant" contingent on political and security compliance. This has been accomplished through a series of administrative measures:

Systematic Disruption of the Public-Sector Wage Bill: The Houthi militia halted regular salary payments, relying on the 2014 Civil Service records.[4] Instead of fulfilling its legal obligation to pay full salaries, it issued half-salary payments at irregular intervals, sometimes separated by several months. Before this, the militia arbitrarily deleted or removed employee records, affecting tens of thousands of individuals who either opposed its policies or had been forcibly displaced from areas under its control.

Plundering Pension and Social Insurance Funds: The Houthi militia seized the cash reserves, investment assets, and real estate holdings of the General Organization for Insurance and Pensions and the civil, military, and security pension funds.[5] These funds consist of personal savings contributions deducted from employees' wages throughout their years of service. Their plunder and diversion to finance military operations have deprived hundreds of thousands of pensioners, older persons, widows, and orphans of their sole source of income, pushing them into extreme destitution and leaving them unable to afford healthcare and life-saving medicines.

3 Regular salary payments to employees of the state's administrative apparatus in governorates under Houthi militia control ceased in September/October 2016, depriving more than 1.2 million government employees and their families of their primary source of income. See reports by the International Labour Organization (ILO) and the World Bank on Yemen's salary crisis: https://www.ilo.org/regions-and-countries/arab-states/yemen.
4 The 2014 database of the Ministry of Civil Service and Insurance serves as the official, nationally and internationally recognized legal reference for identifying state employees entitled to salaries under Civil Service Law No. 19 of 1991. https://yemen-nic.info/db/laws_ye/detail.php?ID=11417
5 Pension and social insurance funds are governed by the Pensions and Social Insurance Law No. 25 of 1991, as amended. These funds constitute the private assets of contributors and beneficiaries, which the law prohibits from being encroached upon or used for purposes other than those expressly prescribed for social insurance. https://yemen-nic.info/db/laws_ye/detail.php?ID=11423

Making Financial Entitlements Conditional on Ideological Allegiance: Through the so-called "Code of Conduct for Public Service Employees" [6] and mandatory attendance at sectarian "cultural courses," the Houthi militia has imposed ideological requirements on public-sector employment. Employees who refuse to participate in the militia's mobilization activities are denied financial incentives and food baskets, and may face arbitrary dismissal or the loss of their employment grades.

Circumvention of UN Mechanisms for Salary Payments: The Houthi militia undermined the economic arrangements established by the Stockholm Agreement (December 2018).[7] Under these arrangements, customs and tax revenues from vessels and petroleum derivatives at the ports of Hudaydah, Salif, and Ras Isa were to be deposited in a dedicated Central Bank account, under UN supervision, for the payment of public-sector employees' salaries. In early 2020, however, the Houthi militia unilaterally withdrew tens of billions of Yemeni rials from this account[8] and seized full control over port revenues without allocating them to salary payments.

B: THE PARADOX OF REVENUE COLLECTION AND REFUSAL TO SPEND: REFUTING THE CLAIM OF SCARCE RESOURCES

The Houthi militia's justifications for evading its salary payment obligations do not withstand objective scrutiny of the revenue situation in areas under its control. The true financial implications of the deliberate refusal to pay wages are revealed by both official figures and admissions from leaders of the de facto authorities. For example, Hamoud Abbad, the militia-appointed Mayor of the Capital Secretariat (Amanat Al-Asimah), disclosed in a televised interview on Al-Lahtha TV that the revenues of the Capital Secretariat alone had doubled compared to a decade earlier. He explicitly stated, "the authorities allocate no more than 3% of their total revenues to the Capital Secretariat."[9]

This implicit admission has serious implications upon closer examination.

6 On 7 November 2022, the Houthi militia issued a document entitled Code of Conduct and Work Ethics in Public Service Units, imposing ideological and political conditions on public-sector employees. Yemen News Agency (Saba – Sana'a). https://www.saba.ye/ar/news3210246.htm

7 The Stockholm Agreement was concluded in Sweden on 13 December 2018, under UN auspices. It stipulated that revenues from the ports of Hudaydah, Salif, and Ras Isa would be deposited at the Hudaydah branch of the Central Bank to contribute to the payment of civil service employees' salaries. United Nations Office of the Special Envoy of the Secretary-General for Yemen.

8 In early 2020, the Houthi militia unilaterally withdrew the funds deposited in the dedicated account at the Hudaydah branch of the Central Bank for the petroleum derivatives initiative and employee salary payments—more than YER 35 billion. The move was condemned by the Office of the UN Special Envoy for Yemen and documented by the UN Panel of Experts in its report S/2021/79. United Nations Office of the Special Envoy of the Secretary-General for Yemen.

9 https://www.youtube.com/watch?v=OmwXr6mCSZQ

It not only reveals the vast financial resources concentrated in the hands of the militia's central leadership, but also exposes the falsehood of claims regarding resource scarcity. When the senior leadership retains about 97% of the capital's revenues, leaving local service sectors in severe financial deprivation, it becomes evident that withholding resources from those entitled to them is not due to an inability to pay, but rather a deliberate political and administrative decision to restructure the local economy.

These admissions are reinforced by the broader exposure of the revenue system: the refusal to pay salaries coincides with a record-breaking and unprecedented surge in the levies and fees collected by the Houthi militia outside any legal or constitutional framework and beyond any parliamentary or financial oversight. These funds are extracted through a wide range of channels, including:

- Sovereign and composite revenues: taxes, customs duties, and revenues from major ports.
- Major monopolistic sectors: telecommunications and fuel companies.
- Newly introduced parallel levies: such as the Khums (one-fifth levy), arbitrary assessments of Zakat payments, and levies imposed through the Awqaf (endowments) authorities.

This massive increase in revenue, managed outside the state's general budget and beyond the principles of transparency and accountability, demonstrates that the Houthi militia possesses a substantial cash surplus—many times greater than the total payroll required to pay employees of the state's administrative apparatus and retirees. Nevertheless, it deliberately withholds these funds, using the deprivation of basic livelihoods as a means of subjugating society and financing its war machine.

Financial data and revenue flows from areas under Houthi militia control undermine the militia's justifications for suspending salary payments. The refusal to disburse salaries coincides with an unprecedented surge in levies and public revenue collected by the militia outside the state's general budget and without parliamentary or financial oversight, as shown in the following table:

Revenue Sector	Collection and Appropriation Mechanism	Estimated Revenue Flows and Actual Expenditure Destinations
Hudaydah Ports and Fuel Revenues	Collection of customs duties, taxes, and revenues from the importation of petroleum products and goods through the Red Sea ports, which handle the bulk of the country's imports.	Hundreds of billions of Yemeni rials annually, transferred to special accounts affiliated with Houthi militia leaders and their monopolistic oil companies, while being withheld from salary payment accounts.
Telecommunications and Information Technology Sector	Full control over state-owned companies (Yemen Mobile, TeleYemen, and the Public Telecommunications Corporation), alongside the imposition of doubled taxes on private mobile telecommunications companies.	The largest source of daily cash revenue in both local and foreign currencies, with proceeds exploited to fund the militia's security and intelligence apparatus and war propaganda.
Domestic Taxation and Customs	Expansion of the tax base imposed on merchants and factories, and the establishment of inland customs checkpoints between governorates to impose double customs duties on goods and food products.	Trillions of Yemeni rials annually, collected in cash and in old banknotes (which have greater purchasing power), and monopolized to sustain the war economy.
Newly Introduced Levies (Khums, Zakat, and Awqaf)	Imposition of compulsory deductions of 20% (khums) on natural resources and economic activities, alongside the centralization of Zakat funds and revenues from Awqaf (religious endowment) lands and properties.	Entirely parallel revenue streams operating outside the state treasury, spent exclusively on sectarian activities, financing military fronts, and enriching the militia's lineage-based leadership.

These figures indicate that the Houthi militia possesses a financial surplus sufficient to cover the salary bill of civilian public-sector employees and pensioners. Nevertheless, it has made a deliberate political decision to withhold these resources from their lawful beneficiaries, using the deprivation of livelihoods as an instrument for controlling and subjugating society.

C: The Compounding Impact of Salary Withholding on Society and Institutions

The policy of salary withholding has caused profound changes, severely weakening both the social fabric and institutional structures. Its most significant effects are evident in four interconnected dimensions:

1. **The Erosion of the Middle Class and the Contraction of Aggregate Demand:** Public-sector employees—including teachers, doctors, engineers, judges, and university professors—formed the backbone of Yemen's middle class. Denying them their salaries for more than eight consecutive years pushed them collectively into extreme poverty, depleted their household savings, and forced them to sell personal assets to secure food. This economic collapse, in turn, paralyzed local markets and drove thousands of small commercial and artisanal businesses into bankruptcy as they lost their regular customers.

2. **Hollowing Out State Institutions and Replacing Professional Staff with Ideological Loyalists**: The suspension of salaries has forced qualified professionals in the education, health, and judicial sectors to abandon their posts and seek manual or marginal work to support their families. The Houthi militia has exploited this vacuum by orchestrating a large-scale staff replacement campaign under the banners of "Alternative Teacher"[10] and "volunteers." As a result, thousands of unqualified ideological loyalists have been placed in schools, courts, and public facilities, transforming civil service institutions into centers for sectarian mobilization.

3. **The Escalation of Negative Coping Mechanisms and the Breakdown of Family Protection:** Families of employees whose salaries have been withheld have been forced, after becoming unable to pay rent and accumulating debts, to adopt desperate survival strategies. These have included reducing the number and nutritional value of daily meals, withdrawing hundreds of thousands of children from school and pushing them into arduous, premature labor, and an increase in child marriage as a means of easing the financial burden on destitute families.

4. **Militarization of the Labor Market and the Use of Hunger as a Driver of Recruitment:** By closing off lawful civilian income opportunities and draining liquidity from the private sector, the Houthi militia has left one principal avenue for earning an income and securing basic subsistence: joining its armed ranks and security apparatus. Salary suspension has thus become a form of economic coercion, driving unemployed young people, heads of households, and even children toward the front lines in exchange for financial allowances and food baskets. This has made the impoverishment of society a functional prerequisite for sustaining the Houthi militia's capacity for military mobilization.

10 The Houthi militia has exploited the suspension of teachers' salaries since 2016 to replace them in public schools with tens of thousands of ideological loyalists under the labels of "alternative teachers" or "volunteers." See the Sana'a Center for Strategic Studies' documented research on the education sector and public-sector employment: https://sanaacenter.org/ar

D: THE LEGAL AND HUMAN RIGHTS CHARACTERIZATION OF THE CRIME OF SALARY CONFISCATION

Under international human rights law and international humanitarian law, salaries and pensions constitute accrued financial entitlements and legally protected private property. Their confiscation gives rise to the following violations:

Violation of Articles 7 and 9 of the International Covenant on Economic, Social and Cultural Rights:[11] These articles guarantee the right of everyone to just and favorable conditions of work, including fair wages that ensure workers and their families a decent standard of living, as well as the right to social security and social insurance.

Breach of International Labour Organization (ILO) Conventions: In particular, the Protection of Wages Convention, 1949 (No. 95),[12] which prohibits the withholding or arbitrary deduction of wages and requires their regular payment. It also establishes legal priority for wage claims over certain other claims and expenditures.

Violation of Private Property Rights and Organized Pillage: Pension and social insurance fund assets constitute private funds belonging to their contributors. Seizing these assets and diverting them to finance armed conflict may constitute unlawful appropriation of protected property and, where the applicable legal elements are established, pillage, prohibited under Rules 51 and 52 of Customary International Humanitarian Law.[13]

11 The United Nations General Assembly adopted the International Covenant on Economic, Social and Cultural Rights under Resolution 2200 A (XXI) on 16 December 1966. The Republic of Yemen acceded to the Covenant on 9 February 1987. https://www.ohchr.org/ar/instruments-mechanisms/instruments/international-covenant-economic-social-and-cultural-rights.

12 International Labour Organization, Protection of Wages Convention, 1949 (No. 95). Articles 8–12 address wage deductions, regular payment, and the legal protection and priority of wage claims. https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C095

13 International Committee of the Red Cross (ICRC), Customary International Humanitarian Law Database: Rule 51 on the treatment of public and private property, and Rule 52 prohibiting pillage in both international and non-international armed conflicts. https://ihl-databases.icrc.org/ar/customary-ihl/v1/rule52



CHAPTER (II): FISCAL PREDATION AND THE MILITARIZATION OF FOOD SUPPLY CHAINS

In a country that imports roughly 90% of its essential food needs,[1] including wheat, rice, sugar, edible oils, and medicines, commercial supply chains are a critical lifeline for the population. The Houthi militia quickly recognized this demographic and economic reality and acted to tighten its control over every stage of the supply chain—from importation, transportation, storage, and distribution to financial settlement. In doing so, it transformed the movement of essential goods from ports and entry points to end consumers into a continuous process of financial extraction.

1 According to data from the Food and Agriculture Organization of the United Nations (FAO) and the World Food Programme (WFP), Yemen relies on imports to meet approximately 90% of its needs for cereals and essential food commodities. https://www.fao.org/yemen/ar/

This system of fiscal engineering serves two interrelated objectives. The first is financial: to drain society's and the commercial sector's cash reserves to finance military operations and security apparatuses. The second is political: to bring domestic capital under its control and replace independent businesses with affiliated monopolistic trading networks that control food availability and pricing.

FIRST: DISSECTING THE SYSTEM OF FINANCIAL EXTRACTION ACROSS SUPPLY CHAINS

The Houthi militia has established a parallel levy system that operates outside the tax and customs legislation in force in the Republic of Yemen. Through administrative decisions and unconstitutional amendments, it has imposed cumulative financial burdens on food and pharmaceutical products at every stage of their movement along the supply chain.

1. Newly Established Inland Customs Points and Double Customs Duties

The Houthi militia has established a network of inland customs checkpoints at the entrances to governorates under its control, most notably the Afar checkpoint in Al-Bayda, checkpoints in Dhamar, Maytam in Ibb, Al-Rahida in Taiz, and checkpoints in Al-Jawf. These have been transformed into revenue-collection points exercising customs-like authority within a single geographic territory. At these checkpoints, the Houthi militia imposes duplicate customs duties and taxes ranging from 50% to 100% of the original customs value on goods, including food and pharmaceutical products, arriving from official ports and entry points under the control of the internationally recognized government.

In addition to direct financial extraction, the Houthi militia uses the practice of holding up food and medicine trucks at these checkpoints for weeks as a means of extorting traders and forcing them to pay additional fines and levies. This causes food shipments and temperature-sensitive medicines to spoil and increases the cost of transporting goods by road between governorates by more than 300% compared with pre-conflict levels.

2. The Sectarian Codification of Taxation: The "Khums" Regulation and Amendments to the Zakat Law

In May 2020, the Houthi militia issued Resolution No. 100 of 2020, promulgating the Implementing Regulations of the Zakat Law,[1] imposing a 20% levy (khums, or one-fifth) on revenues derived from natural, mineral, and marine resources, as well as economic and agricultural activities. The regulations earmarked the proceeds for a specific social group on the basis of lineage, namely the "Bani Hashim."

Alongside this levy, the Houthi militia transformed the newly established General Authority for Zakat into a coercive revenue-collection apparatus that imposes arbitrary and inflated assessments on traders, farmers, and factory owners. Those who refuse to pay face enforcement campaigns involving armed personnel and the closure of their businesses. The militia also imposes recurring levies outside any legal framework under labels such as "war effort," "convoys to the front lines," and the funding of sectarian occasions and events throughout the year.

3. The Monopoly over Petroleum Products and the Use of Energy Pricing to Inflate Food Costs:

The Houthi militia controls the fuel sector through a closed network of newly established companies affiliated with its leaders. It uses the Sana'a branch of the Yemen Petroleum Company to keep retail prices for petroleum products—diesel, gasoline, and liquefied petroleum gas (LPG)—artificially high, regardless of global oil price drops or new fuel shipments arriving at Hudaydah's ports. The militia also periodically manufactures fuel crises and maintains a black market run by its affiliates, where fuel is sold at inflated prices.

Because diesel is the primary input for operating agricultural irrigation pumps, running bakeries and food-processing plants, and transporting commercial goods, manipulation of energy prices directly increases the cost of local agricultural and industrial production. Consequently, every food commodity bears an additional inflationary burden stemming from the fuel monopoly.

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1 Resolution No. 100 of 2020 was issued by the head of the Houthi authorities' Supreme Political Council in Sana'a in May 2020. Articles 47–54 provide for the 20% khums levy on natural resources, mineral wealth, and economic activities, and allocate its proceeds on the basis of lineage. The measure was documented by the UN Panel of Experts in its report S/2021/79.

Source: https://www.alarabiya.net/arab-and-world/yemen/2020/06/10/%D8%B5%D9%86%D8%B9%D8%A7%D8%A1-%D8%A7%D9%84%D8%AD%D9%88%D8%AB%D9%8A%D9%88%D9%86-%D9%8A%D9%81%D8%AA%D8%B9%D9%84%D9%88%D9%86-%D8%A3%D8%B2%D9%85%D8%A9-%D9%85%D8%B4%D8%AA%D9%82%D8%A7%D8%AA-%D9%86%D9%81%D8%B7%D9%8A%D8%A9-%D8%AC%D8%AF%D9%8A%D8%AF%D8%A9-

SECOND: DISMANTLING THE INDEPENDENT COMMERCIAL SECTOR AND THE JUDICIAL PREDATION OF ASSETS

The Houthi militia recognized that the existence of an independent national commercial and banking sector constrained its ability to exercise absolute control over the economy and society. It therefore moved to eliminate traditional capital and replace it with a parasitic capitalist class tied to its security and military apparatuses.

Seizure of Companies through the "Judicial Custodian" and Criminal Courts: The Houthi militia has exploited the Specialized Criminal Court and the Criminal Prosecution Service[2] to issue orders freezing and confiscating the assets of hundreds of commercial and investment companies, banks, telecommunications companies, pharmaceutical and food factories, private universities, and hospitals, under fabricated accusations of espionage or hostility toward the militia. It established the "Judicial Custodian" apparatus to manage and plunder these confiscated assets, estimated to be worth billions of dollars, and divert their operating revenues to finance the militia's activities.

Consolidation of Houthi Monopoly Trading Conglomerates: Confiscation campaigns and tax extortion have driven national capital out of the country and led to the closure of independent chambers of commerce following armed raids, as occurred during the storming of the Sana'a Chamber of Commerce and Industry in May 2023.[3] In the vacuum left by the withdrawal of independent traders, the Houthi militia granted exclusive privileges, import licenses, and customs exemptions to front companies owned by its leaders. This enabled these companies to monopolize the import of essential commodities and petroleum products, control market supply volumes, and maintain prices at high, monopolistic levels in the absence of competition.

Monetary Fragmentation and Confiscation of Remittance Differentials: Since late 2019, the Houthi militia has banned the circulation of official banknotes issued by the Central Bank of Yemen[4] and imposed restrictions

2 In its 2022 report (S/2022/63) and subsequent reports, the UN Security Council's Panel of Experts on Yemen documented the use of the Specialized Criminal Court in Sana'a and the Judicial Custodian apparatus to confiscate companies, banks, universities, and private hospitals in order to finance the war effort. https://www.securitycouncilreport.org/atf/cf/%7B65BFCF9B-6D27-4E9C-8CD3-CF6E4FF96FF9%7D/S_2022_63.pdf

3 On 31 May 2023, armed Houthi militia members stormed the headquarters of the Sana'a Chamber of Commerce and Industry at gunpoint, following statements issued by the Chamber criticizing double customs and tax levies, and ousted its elected board of directors. See the documentation published by Al-Masdar Online: https://almasdaronline.com/articles/276586

4 On 18 December 2019, the Central Bank branch under Houthi militia control in Sana'a issued a circular prohibiting the circulation of official banknotes issued by the Central Bank of Yemen after 2016. This measure fragmented the monetary system and raised domestic money-transfer fees to approximately 50%. https://www.imf.org/en/Countries/YEM

on the movement of funds between governorates. This decision fragmented the country's monetary and banking system and drove domestic money-transfer fees to record levels, at times resulting in deductions of approximately 40% to 50% of the amount transferred. In effect, the Houthi militia appropriated nearly half the value of the savings and financial support sent by workers and expatriates to provide for their families in areas under its control.

THIRD: MAPPING THE TAX BURDEN ON BREAD AND MEDICINE (FROM PORT TO CONSUMER)

The following table illustrates how Houthi administrative decisions and levies accumulate at successive stages of the supply chain, and how their financial burden is ultimately passed on to the Yemeni household's daily table.

Supply Chain Stage	Houthi Militia's Administrative/ Taxation Instrument	Economic Impact on Goods	Livelihood Impact on Households
1. Imports and Ports	Monopoly over import licenses through militia-affiliated companies, and the imposition of additional charges at Hudaydah ports.	Elimination of price competition and an increase in the initial cost of bringing in wheat, medicine, and fuel.	Declining quality of imported goods and higher base prices before they even enter domestic markets.
2. Inter-Governorate Transport	Newly established inland customs checkpoints, double customs duties, truck detentions, and monopolistic diesel pricing.	Doubling of inland freight costs; spoilage of some food and pharmaceutical shipments; and the transfer of losses onto undamaged goods.	Sharp price hikes for flour, rice, infant formula, and life-saving medicines in local markets.
3. Local Production and Storage	The "Khums" (20%) levy, arbitrary zakat assessments, taxes on real estate and warehouses, and "war effort" levies.	Depletion of the working capital of factories and farmers, and a decline in local agricultural production in Tihama, Dhamar, Sana'a, and Amran.	Thousands of agricultural and industrial workers losing their jobs, alongside a decline in the supply of locally produced food.
4. Distribution and Retail Trade	Municipal, endowment, sanitation, and sectarian-event levies imposed on shops, bakeries, and bread ovens.	Reduction in loaf size and increases in bread prices, as well as higher retail markups to cover daily and weekly levies.	Erosion of household purchasing power and the inability of vulnerable groups to secure the minimum daily caloric intake.
5. Financial Settlement and Remittances	Ban on the official national currency, monopolization of money-exchange networks, and excessive fees on domestic remittances.	A severe cash-liquidity crisis in markets and the confiscation of a substantial portion of funds transferred to households.	Deprivation of households dependent on remittances of nearly half their effective income, pushing them into debt and destitution.

FOURTH: THE TAX TRANSMISSION MECHANISM: HOW THE HUNGRY FINANCE THE MACHINERY OF REPRESSION?

Basic foodstuffs and medicines are characterized by **inelastic demand**, meaning that people must purchase them to survive, regardless of how high their prices rise. When they can no longer afford them, they are immediately pushed into hunger and malnutrition.

The Houthi militia exploits this economic characteristic to turn levies imposed on traders and supply chains into **indirect taxes** whose ultimate burden falls on poor consumers. A trader or importer who pays double customs duties at checkpoints in Dhamar, Afar, and elsewhere, pays "war effort" levies and increased zakat assessments, and purchases diesel at monopolistic prices passes all these costs on to the final price of a sack of flour or a box of medicine.

This closed financial cycle creates a cruel paradox: Yemeni families, whose salaries have been confiscated and who have been stripped of social safety nets, are forced to purchase essential goods at inflated prices and pay a **coercive war tax** that directly funds the very security and military apparatus responsible for their repression and starvation.

FIFTH: LEGAL AND HUMAN RIGHTS CLASSIFICATION OF THE MILITARIZATION OF SUPPLY CHAINS

The administrative decisions and fiscal practices imposed by the Houthi militia on food and pharmaceutical supply chains constitute an integrated system of crimes and violations under international humanitarian law and international human rights law:

- **Impairing Objects and Materials Indispensable to the Survival of the Civilian Population (War Crime):** Article 14 of Additional Protocol II to the Geneva Conventions of 1977[5] and Rule 53 of customary international humanitarian law prohibit attacking, destroying, removing, or rendering useless objects and materials indispensable to the survival of the civilian population, such as foodstuffs, agricultural areas, and drinking-water supplies. International criminal law scholarship recognizes that the crime of rendering such resources "useless" and depriving food supplies of their vital function may be committed through administrative measures, arbitrary customs restrictions, and the detention of shipments that drive food and medicine prices to levels that make them economically inaccessible to civilians.

5 Additional Protocol II to the Geneva Conventions of 12 August 1949, relating to the Protection of Victims of Non-International Armed Conflicts (1977), Article 14, which prohibits the starvation of civilians as a method of combat and protects objects indispensable to their survival. https://ihl-databases.icrc.org/ar/ihl-treaties/apii-1977/article-14

- **Violation of the "Economic Accessibility" Component of the Right to Food and Health:** Articles 11 and 12 of the International Covenant on Economic, Social and Cultural Rights[6] recognize every person's right to an adequate standard of living, including sufficient food, and the right to health. In General Comment No. 12, the Committee on Economic, Social and Cultural Rights clarifies that the right to adequate food requires "economic accessibility"—that is, the financial cost of obtaining adequate food must not reach a level that threatens or undermines the fulfillment of other basic household needs. The Houthi militia's deliberate increase in food costs through levies and monopolistic practices constitutes a direct violation of this international obligation.

- **The Crime of Pillage, Extortion, and Confiscation of Private Property:** Article 33 of the Fourth Geneva Convention and Article 4(2)(g) of Additional Protocol II,[7] together with Article 8(2)(e)(v) of the Rome Statute of the International Criminal Court, prohibit acts of pillage and looting in all their forms. The confiscation of companies and funds through the so-called "Judicial Custodian," and the imposition of coercive levies on traders and farmers to finance military operations, constitute forms of organized pillage and financial extortion that warrant international criminal prosecution and individual accountability for those responsible.

6 Article 11 of the International Covenant on Economic, Social and Cultural Rights guarantees the right to an adequate standard of living and the fundamental right to freedom from hunger. In contrast, Article 12 guarantees the right to the enjoyment of the highest attainable standard of physical and mental health. https://www.ohchr.org/ar/instruments-mechanisms/instruments/international-covenant-economic-social-and-cultural-rights

7 Article 33 of the Fourth Geneva Convention of 1949 prohibits collective penalties, measures of intimidation, and pillage. Article 4(2)(g) of Additional Protocol II of 1977 and Article 8(2)(e)(v) of the Rome Statute of the International Criminal Court criminalize pillage in non-international armed conflicts. https://ihl-databases.icrc.org/ar/ihl-treaties/gciv-1949/article-33



CHAPTER (III):

DISMANTLING SOCIAL SAFETY NETS AND POLITICIZING HUMANITARIAN AID

Historically, Yemeni society has depended on two tiers of social protection to weather economic shocks and livelihood crises. The first pillar is formal social safety nets administered by the state, most notably the Social Welfare Fund. The second consists of community-based, charitable, and zakat-funded solidarity networks supported by the private sector and local communities. These systems are further supplemented by international humanitarian relief during emergencies.

The Houthi militia recognized that keeping these channels independent would give poor households a measure of livelihood resilience beyond its control. It therefore pursued a series of administrative and security measures to undermine formal social safety nets, criminalize community-based charitable initiatives, and place international humanitarian assistance under security oversight that turns relief food into an instrument of political and military discrimination.

FIRST: DISMANTLING THE SOCIAL WELFARE FUND AND REMOVING THE OFFICIAL SAFETY NET FOR THE POOREST

The Social Welfare Fund was established under Law No. 31 of 199622 as the first official national safety net for protecting vulnerable groups unable to work. On the eve of the conflict, approximately 1.5 million registered beneficiary cases were listed in the Fund's records, supporting nearly nine million people, including orphans, widows, persons with disabilities, older persons, and destitute families.

Following its takeover of state institutions in Sana'a, the Houthi militia moved to dismantle this vital safety net through three principal practices:

Seizure of Financial Balances and Suspension of Government Disbursements: Since early 2015, the Houthi militia has halted the disbursement of quarterly cash assistance to the Fund's beneficiaries from the state budget. Through what was known as the "Revolutionary Committee," it also seized the Fund's financial balances and operating allocations, leaving millions of the most vulnerable people without any financial resources to cope with the sharp rise in food and medicine prices.

Seizure and Politicization of National Databases: The Houthi militia took control of the Social Welfare Fund's information system and central databases in Sana'a, turning them into a tool for leverage in dealings with UN organizations. It has also persistently sought to amend beneficiary lists to replace the names of original eligible recipients with those of families of its armed members.

Extortion Through the Emergency Cash Transfer Project:[23] When the World Bank and the United Nations Children's Fund (UNICEF) intervened to resume cash assistance payments to the 1.5 million beneficiary cases registered with the Social Welfare Fund through the "Emergency Cash Transfer Project," the Houthi militia repeatedly exerted administrative and security pressure to impose its conditions on intermediary banks and payment agents. Through its monetary decisions and ban on the official national currency, it also created exchange-rate disparities that deprived beneficiaries in areas under its control of the full effective value of their cash assistance compared with their counterparts in other governorates.

22 Law No. 31 of 1996 on Social Welfare, as amended by Law No. 17 of 1999 and Law No. 39 of 2008, established the Social Welfare Fund to provide regular cash assistance to the poorest households; National Information Center. https://yemen-nic.info/db/laws_ye/detail.php?ID=11622

23 The Emergency Cash Transfer Project (ECT) is a program launched by the World Bank and implemented by UNICEF to provide cash transfers to approximately 1.5 million beneficiary cases registered with the Social Welfare Fund following the suspension of government payments. https://www.unicef.org/yemen/ar/%D9%85%D8%B4%D8%B1%D9%88%D8%B9-%D8%A7%D9%84%D8%AD%D9%88%D8%A7%D9%84%D8%A7%D8%AA-%D8%A7%D9%84%D9%86%D9%82%D8%AF%D9%8A%D8%A9-%D8%A7%D9%84%D8%B7%D8%A7%D8%B1%D8%A6%D8%A9

SECOND: CRIMINALIZING INDEPENDENT CHARITABLE WORK AND MILITARIZING THE RELIGIOUS OBLIGATION OF ZAKAT

Direct social solidarity and community-based charitable associations have traditionally served as a safety net, filling gaps in government welfare provision, particularly during seasonal food distribution and the distribution of monetary and in-kind zakat. However, the Houthi militia viewed independent charitable activity as a threat to its political monopoly over society and adopted coercive measures to undermine it and seize its resources:

Establishing the "General Authority for Zakat" and Monopolizing Collection and Distribution: In 2018, the Houthi militia separated the zakat sector from local administration and established a centralized authority reporting directly to its senior leadership. It issued security directives prohibiting traders, businesspeople, and farmers from distributing their zakat directly to the poor or through community-based charitable associations, requiring them instead to remit the full amount to the Authority's accounts under threat of judicial prosecution and asset confiscation.

Redirecting Zakat Proceeds to Finance the War Effort and Sectarian Activities: After centralizing hundreds of billions of Yemeni rials in zakat funds, the Houthi militia diverted these resources from their legally and religiously prescribed purpose of providing relief to the poor and needy, redirecting them to finance combat fronts under the category of "in the cause of Allah," allocate funds for the sustenance of its fighters, and finance mobilization events and sectarian summer centers.

Closure and Confiscation of Charitable Associations and Community Initiatives: The Houthi militia's security agencies launched campaigns to shut down and confiscate dozens of charitable and development organizations and orphanages, seizing their real estate assets and food warehouses. It also imposed security restrictions preventing youth-led and community initiatives from distributing food baskets or iftar meals in impoverished neighborhoods unless they operated through "neighborhood elders" and the militia's affiliated security supervisors. These measures were intended to ensure that any food assistance was attributed to the Houthi militia and to deprive families perceived as non-aligned of such assistance.

THIRD: SCMCHA AND THE ENGINEERING OF SECURITY CONTROL OVER INTERNATIONAL HUMANITARIAN AID

To bring incoming foreign relief flows under its control, the Houthi militia established, in November 2019, what was known as the "Supreme Council for the Management and Coordination of Humanitarian Affairs and International Cooperation" (SCMCHA).[24] It linked the Council's administrative and field operations to its own Security and Intelligence Service before, in October 2024, transferring its oversight powers and integrating them into the Houthi-controlled Ministry of Foreign Affairs[25] in an attempt to circumvent international pressure.

Through this body, the Houthi militia established a bureaucratic and security apparatus that transformed humanitarian operations into a source of funding and control through the following mechanisms:

Manipulation of Beneficiary Lists and the Political Screening of the Hungry: The Houthi militia deprived UN agencies and international organizations of the right to conduct independent field surveys to assess needs, requiring them instead to adopt beneficiary lists prepared by its local supervisors. This interference resulted in tens of thousands of displaced and marginalized families, as well as families of employees opposed to the militia, being removed from beneficiary lists, while the families of Houthi militia members killed in combat and its armed personnel were added to the rolls of the World Food Programme (WFP) and partner organizations.

Financial Extortion and the Imposition of Project Deductions: Through SCMCHA, the Houthi militia imposed financial deductions on the operating budgets of international organizations, including demands for 2% of total project grants. It also compelled relief agencies to contract exclusively with transport, supply, and customs-clearance companies, as well as local associations owned by Houthi leaders. This diverted a substantial portion of international donor funding into direct financial revenues for the militia's coffers.

24 On 6 November 2019, the Houthi militia established SCMCHA under Decision No. 201 of 2019 to tighten security and financial oversight of international organizations. Human Rights Watch documented its practices obstructing aid in its comprehensive report, *A Deadly Obstacle: Restrictions on Humanitarian Assistance in Yemen* (September 2020). https://www.hrw.org/ar/report/2020/09/14/376259

25 In October 2024, the president of the Houthi militia's Supreme Political Council issued a decision dissolving SCMCHA and transferring its functions, staff, and powers to the International Cooperation Sector of the Ministry of Foreign Affairs and Expatriates in Sana'a, in an effort to circumvent international pressure. https://www.saba.ye/ar/news3386051.htm

Permit Warfare and the Obstruction of Humanitarian Access: The Houthi militia used "movement permit" requirements and sub-project agreements as tools to paralyze the movement of relief teams. Food and medicine convoys were detained for extended periods, and hundreds of field missions were cancelled. This resulted in thousands of tonnes of food aid spoiling in warehouses and prompted the World Food Programme (WFP), on multiple occasions, to reduce or suspend distributions[26] in areas under the militia's control.

Abduction and Security Repression of Humanitarian Workers: The Houthi militia's policy of subordinating humanitarian operations culminated in widespread campaigns of abduction and enforced disappearance targeting dozens of employees of UN agencies,[27] including the Office of the High Commissioner for Human Rights, UNICEF, WFP, and UNESCO, as well as international and local organizations. The militia also raided their offices and confiscated their property, bringing fabricated "espionage" charges against humanitarian workers and using them as hostages in its political and financial bargaining. Some detainees have died in prison due to poor detention conditions and denial of access to medical treatment, while others have been released in a desperate state of health.[28]

FOURTH: MATRIX OF THE DISMANTLING OF SOCIAL PROTECTION MECHANISMS IN AREAS UNDER HOUTHI MILITIA CONTROL

The following table illustrates how the Houthi militia has worked to close off all available channels of social protection for poor households, ensuring their complete dependence on the militia's authority.

Level of Social Protection	Original Function Before the Conflict	Houthi Instrument of Dismantling and Control	Direct Impact on Beneficiary Households
1. Formal Social Protection (Social Welfare Fund)	Providing regular cash transfers to 1.5 million beneficiary cases among the poorest households, persons with disabilities, and orphans.	Seizure of the Fund's financial balances and suspension of government disbursements; seizure of databases; and extortion through the Emergency Cash Transfer Project.	Loss of a stable source of cash income for approximately nine million people, compounded by the erosion of the real value of emergency assistance due to monetary fragmentation.

26 In June 2019 and December 2023, the United Nations World Food Programme (WFP) announced the suspension or reduction of general food assistance distributions in areas under Houthi militia control, citing the militia's refusal to permit independent biometric registration and its manipulation of beneficiary lists. https://www.wfp.org/countries/yemen

27 Since June 2024 and throughout 2025, Houthi intelligence agencies have conducted widespread campaigns of abduction and enforced disappearance targeting dozens of employees of UN agencies and international and local organizations. They also raided the Sana'a office of the Office of the United Nations High Commissioner for Human Rights. https://www.ohchr.org/ar/press-releases/2024/06/yemen-un-human-rights-chief-demands-immediate-release-detained-un-and-ngo

28 On 14 October 2026, the United Nations welcomed the release of Sami Al-Kilabi, an employee of the Office of the UN Special Envoy for Yemen who had been detained by the Houthi authorities since June 2024. The UN stated that the Houthi militia continued to detain 71 others. https://news.un.org/ar/story/2026/10/1145545

Level of Social Protection	Original Function Before the Conflict	Houthi Instrument of Dismantling and Control	Direct Impact on Beneficiary Households
2. Community-Based Solidarity, Charitable Assistance, and Zakat	Direct distribution of zakat, charitable donations, and food baskets by traders and charitable associations to disadvantaged households.	Monopolization of zakat through the "General Authority for Zakat"; criminalization of independent charitable distribution; and closure and confiscation of community-based associations.	Deprivation of poor households of direct community support networks, and diversion of zakat funds to finance combat fronts and sectarian activities.
3. International and UN Humanitarian Relief	Providing emergency food, healthcare, and shelter to millions of affected people and displaced persons according to vulnerability criteria.	Imposition of oversight by the intelligence-linked SCMCHA; manipulation of beneficiary lists; looting of aid; and abduction of humanitarian workers.	Deprivation of eligible beneficiaries of their food rations, reduction of international relief programs, and diversion of aid to reward combatants.

FIFTH: LEGAL AND HUMAN RIGHTS CLASSIFICATION OF THE DISMANTLING OF SOCIAL SAFETY NETS AND THE POLITICIZATION OF HUMANITARIAN AID

The Houthi militia's practices of dismantling social welfare networks and obstructing and diverting humanitarian assistance constitute serious violations of international humanitarian law and international human rights law, warranting international criminal accountability.

1. Deliberate Obstruction of Humanitarian Relief (War Crime): Article 18(2) of Additional Protocol II to the Geneva Conventions of 1977[29] and Rules 55 and 56 of customary international humanitarian law require that impartial humanitarian relief supplies be allowed to pass and that their rapid and unimpeded delivery to civilians in need be facilitated. They also require that humanitarian relief personnel be guaranteed freedom of movement and protection. Article 8(2)(e)(xix) of the Rome Statute of the International Criminal Court identifies the deliberate obstruction of relief supplies as an element of the war crime of using starvation of civilians as a method of warfare.

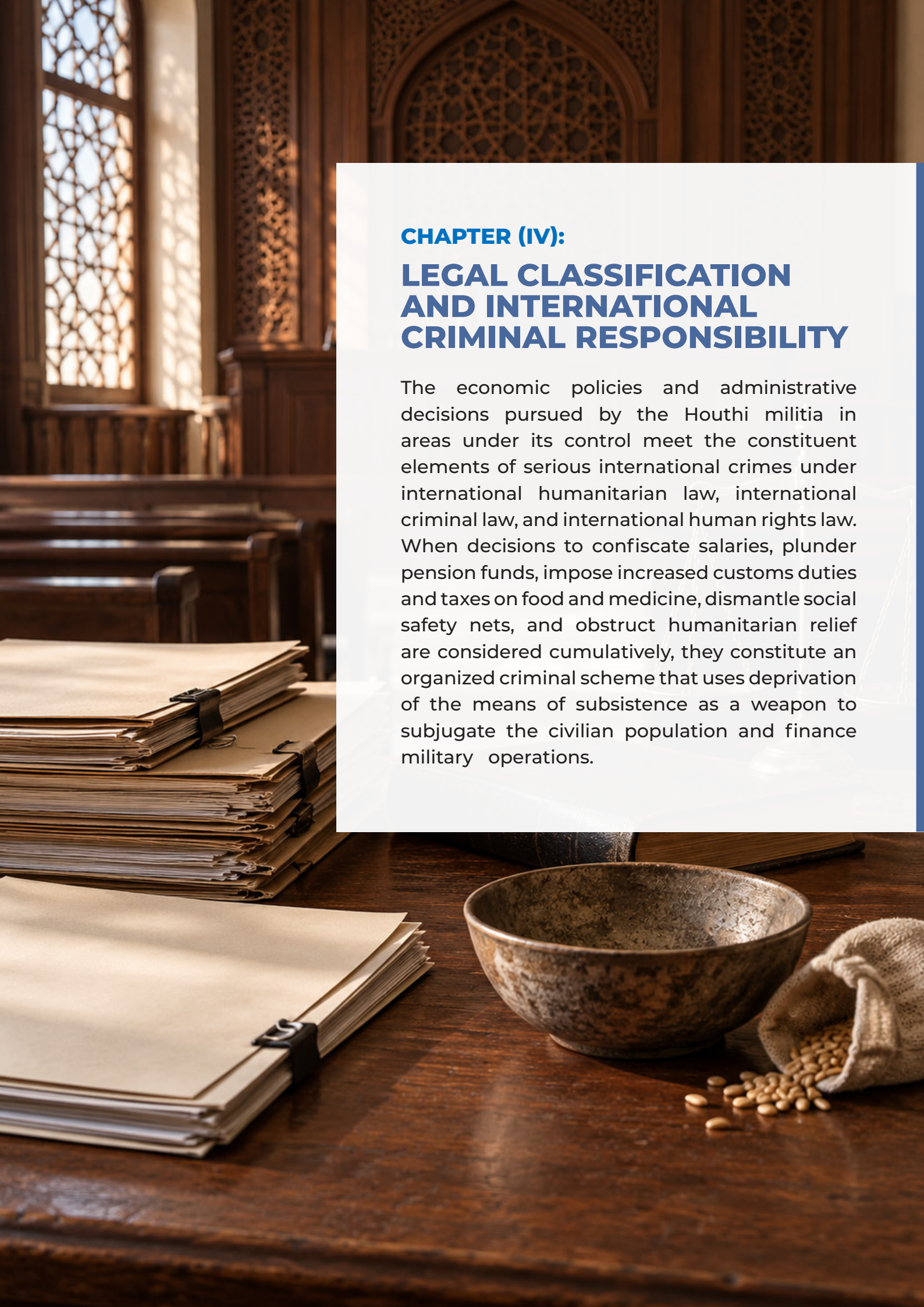
29 Article 18(2) of Additional Protocol II and Rules 55 and 56 of customary international humanitarian law require that humanitarian relief supplies for civilians in need be allowed to pass and facilitated, and that humanitarian relief personnel be guaranteed freedom of movement and protection. https://ihl-databases.icrc.org/ar/customary-ihl/v1/rule55

Attacks Against Humanitarian Relief Personnel and Their Property: Article 8(2)(e)(iii) of the Rome Statute of the International Criminal Court[30] prohibits intentionally directing attacks against personnel, installations, material, units, or vehicles involved in humanitarian assistance missions. The abduction and enforced disappearance of UN and international organization personnel, raids on their offices, and confiscation of their assets constitute a combination of international crimes that violate the functional immunities afforded under the 1946 Convention on the Privileges and Immunities of the United Nations.

Violation of the Principle of Non-Discrimination and the Rights to Social Security and Food: Articles 2(2), 9, and 11 of the International Covenant on Economic, Social and Cultural Rights require the rights to social security and adequate food to be guaranteed to all individuals without discrimination based on political opinion or social origin. Conditioning access to humanitarian assistance, zakat allocations, and social welfare benefits on political or ideological loyalty, or participation in combat operations, constitutes a serious breach of the principles of humanity, impartiality, and independence governing international humanitarian action under United Nations General Assembly Resolution 46/182.[31]

30 Article 8(2)(e)(iii) of the Rome Statute of the International Criminal Court criminalizes, as a war crime in non-international armed conflicts, intentionally directing attacks against personnel, installations, material, units, or vehicles involved in humanitarian assistance missions. https://www.icc-cpi.int/sites/default/files/RS-Ar.pdf

31 United Nations General Assembly Resolution 46/182, adopted on 19 December 1991, on strengthening the coordination of emergency humanitarian assistance provided by the United Nations, which established the principles of humanity, neutrality, impartiality, and independence. https://www.un.org/ar/ga/search/view_doc.asp?symbol=A/RES/46/182



CHAPTER (IV):

LEGAL CLASSIFICATION AND INTERNATIONAL CRIMINAL RESPONSIBILITY

The economic policies and administrative decisions pursued by the Houthi militia in areas under its control meet the constituent elements of serious international crimes under international humanitarian law, international criminal law, and international human rights law. When decisions to confiscate salaries, plunder pension funds, impose increased customs duties and taxes on food and medicine, dismantle social safety nets, and obstruct humanitarian relief are considered cumulatively, they constitute an organized criminal scheme that uses deprivation of the means of subsistence as a weapon to subjugate the civilian population and finance military operations.

FIRST: THE WAR CRIME OF STARVING CIVILIANS AS A METHOD OF WARFARE

The prohibition against starving civilians is a peremptory rule of customary and treaty-based international humanitarian law that applies equally in both international and non-international armed conflicts:

Legal Basis for Criminalization: Article 14 of Additional Protocol II to the Geneva Conventions of 1977 (applicable to non-international armed conflicts and ratified by the Republic of Yemen) provides that: *"Starvation of civilians as a method of combat is prohibited. It is therefore prohibited to attack, destroy, remove or render useless, for that purpose, objects indispensable to the survival of the civilian population, such as foodstuffs, agricultural areas for the production of foodstuffs, crops, livestock, drinking-water installations and supplies, and irrigation works."* Rule 53 of the International Committee of the Red Cross's study on customary international humanitarian law reaffirms this absolute prohibition.

Criminalization under the Rome Statute and Security Council Resolutions: Article 8(2)(e)(xix) of the Rome Statute of the International Criminal Court, as adopted by consensus through the amendment approved in December 2019[32], classifies *"intentionally using starvation of civilians as a method of warfare by depriving them of objects indispensable to their survival, including wilfully impeding relief supplies"* as a war crime in non-international armed conflicts. United Nations Security Council Resolution 2417 (2018)[33] also affirmed the direct link between armed conflict and food insecurity resulting from the practices of parties to the conflict. It condemned the use of starvation of civilians and the obstruction of humanitarian access, recognizing that such acts may constitute war crimes warranting accountability and the imposition of international sanctions.

The constituent elements of this crime are met by the practices of the Houthi militia through the presence of the three elements recognized in international criminal law:

32 On 6 December 2019, the Assembly of States Parties to the Rome Statute adopted Resolution ICC-ASP/18/Res.5, adding paragraph 8(2)(e)(xix), which criminalizes the intentional use of starvation of civilians as a method of warfare by depriving them of objects indispensable to their survival, including the willful obstruction of relief supplies in non-international armed conflicts. https://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&mtdsg_no=XVIII-10-g&chapter=18&clang=_en

33 United Nations Security Council Resolution 2417 (2018), unanimously adopted on 24 May 2018, condemned the use of starvation of civilians as a method of warfare and the unlawful denial of humanitarian access, and affirmed the possibility of imposing international sanctions on those responsible. https://undocs.org/ar/S/RES/2417(2018)

1. The Material Element (Actus Reus): Deprivation and Administrative and Financial Disruption of the Essentials of Survival

The material element of the crime of starvation is established by depriving civilians of objects and materials indispensable to their survival, destroying, removing, or "rendering them useless," or obstructing humanitarian relief supplies. In contemporary international criminal law, the concept of "objects and materials indispensable to survival" encompasses food, water, and medicine, and extends to the economic and logistical means necessary to access and obtain these essentials.[34] The Houthi militia carries out acts of "deprivation and disruption" through four concurrent mechanisms:

- **Financial Disruption of Purchasing Power:** The suspension of salaries for 1.2 million public employees, the confiscation of retirees' pensions, and the withholding of social welfare benefits deprive millions of households of their only lawful means of purchasing food and medicine available in the markets.
- **Fiscal Disruption of Supply Chains:** The establishment of inland customs checkpoints between governorates, the imposition of double customs duties, the detention of food and medicine trucks until their cargo spoils, the imposition of the "Khums" (one-fifth, or 20%) levy, and monopolistic fuel pricing constitute administrative and financial measures that drive the cost of essential goods to levels beyond the reach of the civilian population.
- **Destruction and Removal of the Means of Local Production:** The plunder of agricultural land, the confiscation of food companies and factories through the "Judicial Custodian," and the imposition of coercive levies on farmers and fishers undermine the community's capacity to produce its own food.
- **Deliberate Obstruction of Relief Supplies:** This is carried out through practices by the Houthi militia's intelligence-linked "SCMCHA," including detaining aid convoys, restricting the movement of UN agencies, abducting humanitarian workers, and manipulating beneficiary lists to divert assistance to combatants.

International criminal law establishes that the crime of starvation is a

34 See: Additional Protocol II to the Geneva Conventions (1977), Article 14; the International Committee of the Red Cross's study on customary international humanitarian law, Rule 54, concerning the prohibition against attacking, destroying, removing, or rendering useless objects and materials indispensable to the survival of the civilian population; and the negotiating commentary on the adoption of the war-crime elements relating to starvation under the Rome Statute of the International Criminal Court (Article 8(2)(e)(xix)). https://ihl-databases.icrc.org/en/customary-ihl/v1/rule54

"conduct crime," the constituent elements of which are fulfilled once the deliberate deprivation of essential supplies and the obstruction of humanitarian relief have occurred, without requiring the victims to reach the point of actually dying of starvation.

2. The Mental Element (Mens Rea): Criminal Intent and Knowledge of the Inevitable Consequences

The crime of starvation requires the perpetrators to possess criminal intent. Under international criminal law, this intent is manifested in two forms, both of which are present in the conduct of the Houthi militia's leadership:

First-Degree Direct Intent: This consists of the Houthi militia's deliberate intention to impoverish and starve the civilian population in order to subjugate it politically, undermine society's capacity for civil or trade-union resistance, and use deprivation and hunger as instruments of coercion to drive young people and children into recruitment camps in exchange for food and financial allowances.

Second-Degree Direct Intent (Knowledge of the Certain Consequence): This arises when the perpetrator knows that the starvation of civilians is an inevitable and natural consequence of their decisions in the ordinary course of events, yet proceeds to implement them. The Houthi militia's collection of trillions of Yemeni rials annually in taxes, customs duties, telecommunications charges, fuel revenues, and zakat, coupled with its continued refusal to pay salaries since 2016 and its issuance of written legislation and decisions increasing levies on food, demonstrates its prior knowledge with certainty that these measures would inevitably drive millions of households into acute hunger and malnutrition.

3. The Nexus with the Armed Conflict

The system of impoverishment and starvation administered by the Houthi militia is intrinsically and directly linked to the non-international armed conflict. The Houthi militia extracts money from the mouths of the hungry under the pretexts of the "war effort" and "organizing convoys to the front lines." It confiscates funds from pension and zakat funds, as well as commercial assets, to finance its military operations and security apparatus, and exploits the deprivation of household income and assistance to mobilize fighters for deployment to the battlefronts.

SECOND: CRIMES AGAINST HUMANITY, PILLAGE, AND COLLECTIVE PUNISHMENT

In addition to the war crime of starvation, the practices of the Houthi militia meet the constituent elements of several other categories of international crimes:

1. Crimes Against Humanity (Persecution and Other Inhumane Acts)

Under Article 7 of the Rome Statute of the International Criminal Court, acts committed as part of a "widespread or systematic attack directed against any civilian population, with knowledge of the attack" constitute crimes against humanity. The Houthi militia's conduct gives rise to these crimes through two principal forms:

The Crime of Persecution (Article 7(1)(h)): Persecution is defined as the intentional and severe deprivation of fundamental rights, contrary to international law, by reason of the identity of a group or collectivity. It is manifested in the Houthi militia's dismissal of public employees and removal of their names from civil service records; confiscation of the funds and property of traders and opponents through criminal courts and the "Judicial Custodian"; denial of food assistance and zakat to families deemed disloyal; and enactment of the "Khums" regulation, which appropriates the wealth of society for the benefit of a specific lineage-based group.

Other Inhumane Acts (Article 7(1)(k)):[35] These include systematic acts that intentionally cause great suffering or serious injury to the body or to mental or physical health. Depriving millions of children, women, older persons, and people with chronic illnesses of adequate food and life-saving medicine through systematic impoverishment policies inflicts severe physical and health-related harm that may amount to other inhumane acts.

2. The War Crime of Systematic Pillage

Article 33 of the Fourth Geneva Convention, Article 4(2)(g) of Additional Protocol II, Rule 52 of customary international humanitarian law, and Article 8(2)(e)(v) of the Rome Statute prohibit pillage and plunder in all their forms. In international criminal jurisprudence, pillage encompasses the unlawful and forcible appropriation of private and public property during armed conflict, whether carried out through direct looting in the field or through sham administrative and judicial decisions.

35 Article 7(1)(k) of the Rome Statute of the International Criminal Court covers other inhumane acts committed as part of a widespread or systematic attack against a civilian population that intentionally cause great suffering or serious injury to the body or to mental or physical health. https://www.icc-cpi.int/sites/default/files/RS-Ar.pdf

Accordingly, the Houthi militia's seizure of pension and social insurance funds belonging to contributors; confiscation of hundreds of companies, banks, hospitals, universities, and private real estate through the "Judicial Custodian"; and imposition of coercive financial levies on traders and farmers collectively constitute systematic pillage, warranting international criminal accountability and requiring the perpetrators to return the property and provide reparation for the harm caused.

3. The Crime of Collective Punishment

Article 33 of the Fourth Geneva Convention, Article 4(2)(b) of Additional Protocol II, and Rule 103 of customary international humanitarian law prohibit the imposition of collective punishments on civilian populations. The suspension of salaries for the state's administrative workforce, the imposition of an internal customs blockade, and the prohibition on the circulation of the national currency constitute forms of collective punishment imposed by the Houthi militia on millions of civilians in an effort to subjugate them to its coercive rule.

THIRD: SERIOUS VIOLATIONS OF INTERNATIONAL HUMAN RIGHTS LAW

International legal scholarship, judgments of the International Court of Justice, and the jurisprudence of United Nations treaty bodies affirm two interrelated principles. First, international human rights law remains in force and applicable during armed conflicts, alongside international humanitarian law. Second, non-state armed groups that exercise effective control over territory and its population and perform government-like functions—including, foremost, the Houthi militia—bear international legal obligations to respect, protect, and fulfil the fundamental human rights of the population under their control.

The Houthi militia's impoverishment policies constitute serious violations of the provisions of the **International Covenant on Economic, Social and Cultural Rights** (ratified by Yemen in February 1987):

Violation of the Rights to Work, Fair Wages, and Social Security (Articles 6, 7, and 9): Articles 6 and 7 require the right of every person to work and to enjoy just and favourable conditions of work that ensure remuneration sufficient to provide all workers and their families with an adequate standard of living. Article 9 guarantees the right to social security and social insurance. The Houthi militia has violated these provisions by confiscating wages, imposing unpaid forced labour on public-sector personnel, and plundering social insurance and pension funds.

Violation of the Right to an Adequate Standard of Living and the Rights to Food and Health (Articles 11 and 12): Article 11 obliges States to uphold the right of everyone to an adequate standard of living for themselves and their families, including adequate food, clothing, and housing, as well as the fundamental right to be free from hunger. In **General Comment No. 12**, the Committee on Economic, Social and Cultural Rights affirms that the right to food requires ensuring the "economic and physical accessibility" of food. A failure by the authority exercising control to guarantee such access, or the imposition of financial and administrative barriers that prevent people from securing their food, constitutes a direct violation of the Covenant.

Breach of Minimum Core Obligations and the Prohibition of Deliberately Retrogressive Measures: Under **General Comment No. 3** issued by the Committee on Economic, Social and Cultural Rights, every authority bears minimum core obligations to ensure the satisfaction of essential minimum levels of fundamental rights, including food, primary health care, housing, and social security. The Committee emphasizes that adopting deliberate "retrogressive measures" that reduce the level of enjoyment of these rights, while financial resources remain available and are directed towards military and security expenditure, constitutes a serious violation that cannot be justified by the circumstances of armed conflict.

FOURTH: LEGAL CLASSIFICATION MATRIX FOR THE HOUTHI SYSTEM OF IMPOVERISHMENT AND STARVATION

The following table summarizes the links between the Houthi militia's administrative and financial practices, the international legal rules violated, and the resulting criminal classifications.

Houthi Practice / Decision	Violated International Legal Rule	Criminal and Human Rights Classification
Suspension of civil servants' salaries since 2016 while collecting trillions of Yemeni rials in revenues	Article 14 of Additional Protocol II; Article 8(2)(e)(xix) of the Rome Statute; Articles 6, 7, and 11 of the International Covenant on Economic, Social and Cultural Rights (ICESCR); International Labour Organization Convention No. 95.	Material element of the war crime of starving civilians; crime of collective punishment; serious violation of the right to fair wages and the right to freedom from hunger.
Plundering pension and social insurance funds and appropriations allocated to the Social Welfare Fund	Article 4(2)(g) of Additional Protocol II; Rule 52 of customary international humanitarian law; Article 8(2)(e)(v) of the Rome Statute; Article 9 of the ICESCR.	War crime of systematic pillage of protected property; serious violation of the right to social security and the protection of vulnerable groups.
Establishment of inland customs checkpoints, double customs duties, and the "Khums" (20%) regulation	Article 14 of Additional Protocol II; Rule 53 of customary international humanitarian law; Article 7(1)(h) of the Rome Statute; Article 11 of the ICESCR (General Comment No. 12).	Impairment of objects indispensable to civilian survival (war crime); crime against humanity of persecution and lineage-based discrimination; destruction of economic access to food.
Confiscation of companies, commercial assets, and real estate through the "Judicial Custodian"	Article 33 of the Fourth Geneva Convention; Articles 8(2)(e)(v) and 7(1)(h) of the Rome Statute; Article 17 of the Universal Declaration of Human Rights.	War crime of systematic pillage and looting; crime against humanity of persecution on political grounds.
Obstruction of United Nations humanitarian relief, manipulation of beneficiary lists, and abduction of humanitarian aid workers	Article 18(2) of Additional Protocol II; Rules 55 and 56 of customary international humanitarian law; Articles 8(2)(e)(iii) and 8(2)(e)(xix) of the Rome Statute; United Nations Security Council Resolution 2417.	War crime of intentionally obstructing relief supplies and starving civilians; war crime of attacking humanitarian relief personnel.

FIFTH: INDIVIDUAL CRIMINAL RESPONSIBILITY AND GROUNDS FOR INTERNATIONAL SANCTIONS

The crimes documented in this study give rise to direct individual criminal responsibility that is not subject to any statute of limitations and cannot be precluded by any claimed immunities. This responsibility extends to both the leadership and operational levels of the Houthi militia:

Responsibility of Financial and Administrative Architects (Article 25 of the Rome Statute):[36] Criminal responsibility attaches to anyone who commits the crime of starvation, pillage, or persecution; orders its commission; solicits or induces its commission; or aids, abets, or otherwise assists in its commission in any way, or contributes to the commission of such a crime

36 Article 25 of the Rome Statute of the International Criminal Court establishes individual criminal responsibility for anyone who commits a crime, orders or solicits its commission, induces its commission, aids or assists in its commission, or contributes to a group acting with a common purpose. https://www.icc-cpi.int/sites/default/files/RS-Ar.pdf

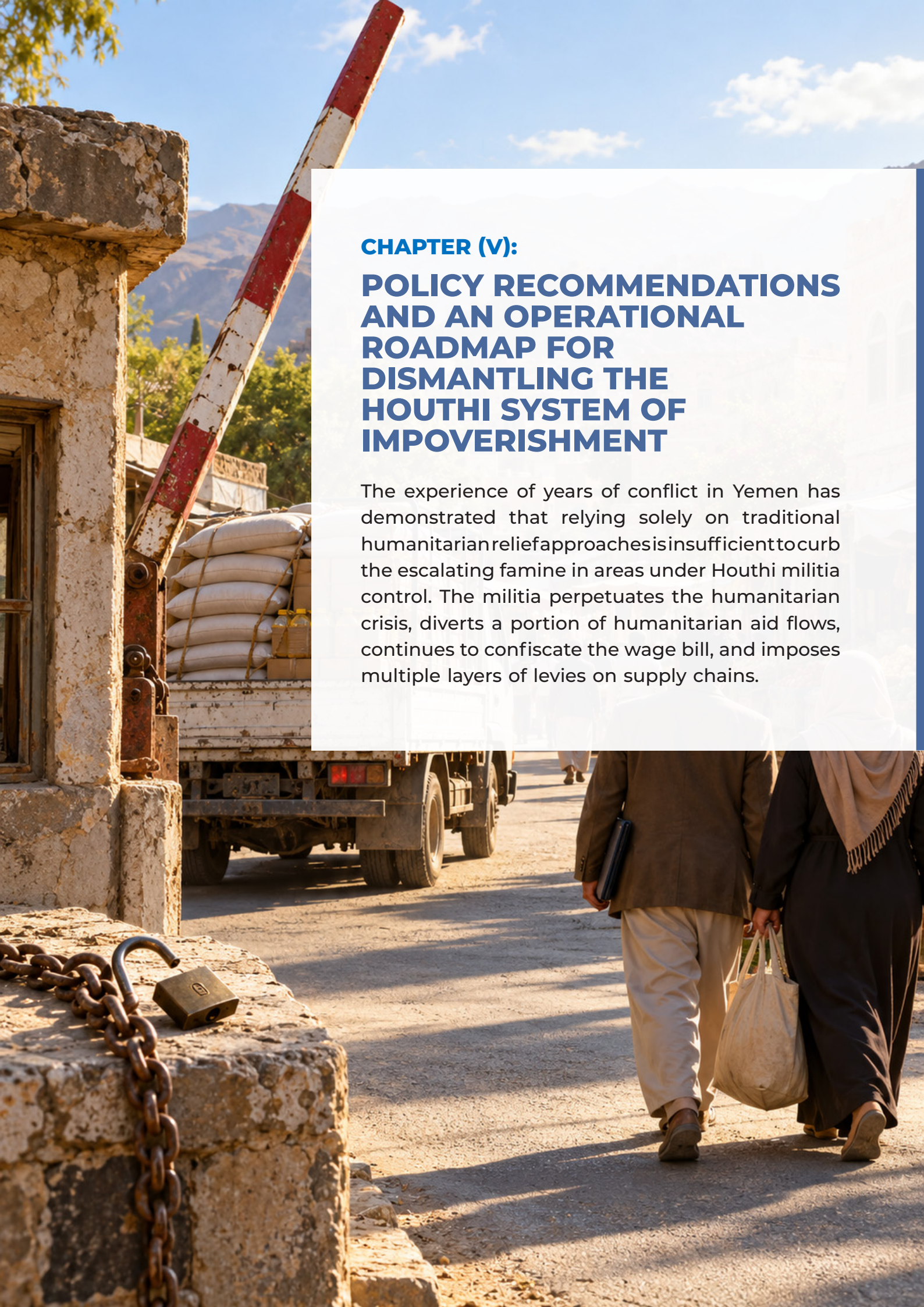
by a group acting with a common purpose. Under this principle, individual criminal responsibility extends to the political and military leaders of the Houthi militia and equally to the economic, administrative, and judicial officials who designed and implemented these policies, including the heads and officials of the so-called "Supreme Political Council," the "General Authority for Zakat," the Tax and Customs Authorities, the Sana'a branch of the Central Bank of Yemen, the "Judicial Custodian" apparatus, the "Supreme Council for the Management and Coordination of Humanitarian Affairs" (SCMCHA), and judges and members of the Specialized Criminal Court and Specialized Criminal Prosecution involved in issuing confiscation and pillage orders.

Command and Superior Responsibility (Article 28 of the Rome Statute)[37] The military commanders and civilian superiors of the Houthi militia bear criminal responsibility for crimes committed by their subordinates under their effective control, given their knowledge of the commission of these crimes, their issuance of direct instructions for their implementation, and their financial gains from the proceeds.

Eligibility for Sanctions under United Nations Security Council Resolutions 2140, 2216, and 2417[38] United Nations Security Council Resolution 2140 (2014), in paragraphs 17 and 18, established the criteria for designation under international sanctions measures, including asset freezes and travel bans. These criteria include obstructing or undermining the political transition, violating international humanitarian law and human rights law, and "obstructing the delivery of humanitarian assistance to Yemen or access to, or distribution of, humanitarian assistance in Yemen." Resolution 2417 (2018) reinforced this framework by emphasizing sanctions as a measure applicable against individuals and entities that obstruct humanitarian access and use the starvation of civilians as a method of warfare. Accordingly, Houthi financial and security leaders, as well as affiliated commercial and banking entities involved in the plundering of salaries, imposing levies on food, and obstructing humanitarian relief, meet the criteria for immediate designation under international, US, and European sanctions regimes.

37 Article 28 of the Rome Statute of the International Criminal Court establishes the responsibility of military commanders and civilian superiors for international crimes committed by subordinates under their effective authority and control. https://www.icc-cpi.int/sites/default/files/RS-Ar.pdf

38 Under Chapter VII of the United Nations Charter, Security Council Resolution 2140 (2014) established the Yemen sanctions regime, the Yemen Sanctions Committee, and the Panel of Experts. Paragraphs 17 and 18 set out the designation criteria, including violations of international humanitarian law and the obstruction of humanitarian assistance. These criteria were further reinforced by Resolutions 2216 (2015) and 2417 (2018). https://main.un.org/securitycouncil/ar/sanctions/2140



CHAPTER (V):

POLICY RECOMMENDATIONS AND AN OPERATIONAL ROADMAP FOR DISMANTLING THE HOUTHI SYSTEM OF IMPOVERISHMENT

The experience of years of conflict in Yemen has demonstrated that relying solely on traditional humanitarian relief approaches is insufficient to curb the escalating famine in areas under Houthi militia control. The militia perpetuates the humanitarian crisis, diverts a portion of humanitarian aid flows, continues to confiscate the wage bill, and imposes multiple layers of levies on supply chains.

Protecting the economic and social rights of millions of Yemeni civilians requires the international community to move towards dismantling the administrative and financial system that generates hunger. Based on the findings and legal analysis presented in this study, the American Center for Justice (ACJ) proposes an operational roadmap comprising specific demands and recommendations addressed to international, United Nations, and national decision-making bodies:

First: To the United Nations Security Council, the Sanctions Committee Established Pursuant to Resolution 2140, and the Panel of Experts

The United Nations Security Council possesses binding legal instruments under Chapter VII of the United Nations Charter, particularly Resolutions 2140 (2014) and 2417 (2018), to sanction those who use starvation as a method of warfare and obstruct humanitarian access. Accordingly, the American Center for Justice (ACJ) recommends the following:

Designating the Financial and Administrative Architects of Impoverishment for International Sanctions: Expand targeted sanctions, including asset freezes and travel bans, to cover the Houthi militia's economic, administrative, and judicial leaders responsible for designing and implementing policies to confiscate wages, plunder property, and impose levies. These should include, in particular:

- The heads and officials of the so-called **"Judicial Custodian"** apparatus, as well as judges and members of the Specialized Criminal Court and Specialized Criminal Prosecution involved in issuing orders to seize and confiscate private companies and assets.
- The heads and officials of the **General Authority for Zakat**, the Tax and Customs Authorities, and the General Authority for Endowments, who oversee implementation of the **"Khums"** regulation and the newly established inland customs checkpoints.
- Houthi-appointed officials in the Sana'a branch of the Central Bank of Yemen who are responsible for fragmenting the monetary system and confiscating the reserves of pension and social insurance funds.
- Security and administrative leaders overseeing the **Supreme Council for the Management and Coordination of Humanitarian Affairs (SCMCHA)** and the newly established alternative departments within the militia's Ministry of Foreign Affairs, who are implicated in obstructing humanitarian relief and abducting United Nations personnel.

- **Imposing Sectoral Sanctions on Monopolistic Commercial Conglomerates and Front Companies:** Designate monopolistic oil and trading companies, exchange networks, and financial entities established by Houthi militia leaders to monopolize fuel and food imports, launder proceeds from levies, and finance the war effort, for inclusion on international, US, and European sanctions lists.
- **Mandating the Panel of Experts to Trace Plundered Funds:** Direct the Panel of Experts assisting the 2140 Sanctions Committee to prepare a dedicated investigative annex tracing the financial flows of funds confiscated from pension and social insurance funds, revenues from the ports of Hudaydah and the telecommunications sector, and plundered commercial assets, while identifying the regional and international networks used to smuggle these funds or invest them abroad.

SECOND: TO THE OFFICE OF THE UN SPECIAL ENVOY FOR YEMEN AND THE STATES SPONSORING THE PEACE PROCESS

The prioritization of short-term political approaches has enabled the Houthi militia to use civilian hunger and public-sector salaries as bargaining chips for political and military coercion. To address this failure, the American Center for Justice (ACJ) calls for the following:

Safeguarding Economic Rights Against Political Bargaining: Separate the issues of salary payments, food security, and freedom of movement of goods from military and political negotiations. Treat the payment of wages and the abolition of levies as immediately enforceable legal and humanitarian obligations under international humanitarian law.

Establishing a Binding Oversight Mechanism to Pay Salaries from Diverted Revenues: Make a binding prerequisite for any political agreements the requirement that the Houthi militia deposit all sovereign revenues collected in areas under its control—including revenues from the ports of Hudaydah, Salif, and Ras Isa, telecommunications revenues, taxes, and customs duties—into a unified bank account subject to international and United Nations oversight and administration. These resources should be allocated to the regular payment of salaries to all civilian state employees, retirees, and social welfare beneficiaries, in accordance with the 2014 payroll records, without deletion or political exclusion.

Dismantling Internal Customs Barriers and Unifying the Monetary Market: Require any economic roadmap to include a binding, UN-monitored timetable for closing all newly established inland customs checkpoints

between governorates, abolishing double customs duties on food and medicine, suspending the "Khums" regulation and unlawful levies, and requiring the Houthi militia to lift the ban on the circulation of the official national currency and end restrictions and fees imposed on domestic money transfers.

THIRD: TO UNITED NATIONS AGENCIES, INTERNATIONAL HUMANITARIAN ORGANIZATIONS, AND INTERNATIONAL DONORS

United Nations agencies and international organizations bear a legal and moral responsibility to ensure that humanitarian assistance and operational budgets do not become financial and military resources sustaining the Houthi militia's repressive apparatus. To this end, the American Center for Justice (ACJ) recommends the following:

Freeing Humanitarian Operations from the Militia's Security Oversight: Adopt a unified and firm UN position rejecting security and administrative interference by SCMCHA or any alternative departments affiliated with the Houthi militia in project design. Restore the exclusive and independent authority of international organizations to conduct field surveys, assess needs, and prepare beneficiary lists based solely on humanitarian vulnerability criteria.

1. **Full Transition to Digital Cash Transfer Systems:** Reduce reliance on in-kind food shipments that are vulnerable to looting, confiscation, and detention at checkpoints, and expand direct cash-transfer and electronic voucher programmes for beneficiaries. This will help ensure that financial assistance reaches eligible households directly and prevent the manipulation of beneficiary lists or the diversion of aid to finance military fronts.

2. **Purging Houthi-Affiliated Companies from UN Logistical Contracting Chains:** Conduct a comprehensive, independent financial and security audit of all procurement, road transport, warehousing, customs clearance, banking services, and local partner organizations engaged by UN agencies in areas under Houthi militia control. Place companies and entities owned by Houthi leaders on a blacklist barring them from UN contracts, and refuse to pay any deductions from project grants, regardless of the label under which they are imposed.

3. **Conditioning Non-Emergency Interventions on the Safety and Freedom of Humanitarian Workers:** Suspend all institutional support programmes, capacity-building initiatives, and operational funding directed to institutions under the militia's control. Make any non-emergency humanitarian engagement conditional on the immediate and unconditional release of all abducted and forcibly disappeared personnel from the United Nations and international and local organizations, and on the provision of binding international guarantees to protect humanitarian workers and their premises.

FOURTH: TO INTERNATIONAL JUDICIAL MECHANISMS, THE HUMAN RIGHTS COUNCIL, AND INTERNATIONAL FINANCIAL INSTITUTIONS

The impunity enjoyed by the architects of starvation and plunder policies encourages the Houthi militia to further expand its economic crimes. To activate mechanisms for deterrence, accountability, and criminal and financial justice, the American Center for Justice (ACJ) calls for the following:

Establishing an Independent International Criminal Investigation and Accountability Mechanism for Yemen: Call upon the United Nations Human Rights Council to establish an independent international investigative mechanism mandated to collect, preserve, and analyse criminal evidence relating to international crimes committed in Yemen. The mechanism should include a specialized financial investigation unit tasked with documenting crimes of systematic starvation, organized plunder, and asset confiscation, and identifying the individual criminal responsibility of Houthi militia leaders, with a view to their prosecution.

Activating the Principle of Universal Jurisdiction: Urge judicial authorities and public prosecutors in democratic countries to initiate criminal and civil proceedings against Houthi militia leaders and the architects of its economic policies implicated in war crimes and crimes against humanity, including starvation, pillage, and persecution, and to pursue their international financial and commercial networks.

Tracing, Freezing, and Recovering Plundered Funds and Assets: Strengthen technical and legal cooperation among the US Department of the Treasury, the Financial Action Task Force (FATF), and regional and international financial intelligence units to identify and freeze bank accounts, real estate, and investment assets derived from the plunder of pension funds and public and private funds in Yemen. Work towards

establishing an international trust fund to return these confiscated assets to their lawful owners and finance social protection networks.

FIFTH: TO THE INTERNATIONALLY RECOGNIZED YEMENI GOVERNMENT AND THE CENTRAL BANK OF YEMEN

The legitimate state institutions have a constitutional and legal obligation to protect citizens and the private sector from the Houthi militia's fiscal and judicial predation through the following measures:

Establishing a "National Registry for Documenting Plundered Funds and Assets": Establish an independent national legal and financial body tasked with accurately documenting all rulings issued by Houthi criminal courts and the "Judicial Custodian" apparatus; identifying and inventorying all confiscated companies, banks, real estate, bank accounts, and pension fund assets; and issuing judicial rulings invalidating all legal transactions and sales involving these assets. The resulting lists should be circulated among governments, international financial institutions, and international chambers of commerce to prevent dealings with entities whose assets have been unlawfully seized.

Protecting Supply Chains and the National Commercial Sector: Provide a package of credit, customs, and maritime facilitation measures for national traders and importers; secure alternative and protected transport and supply routes for food and pharmaceutical commodities; activate the Central Bank of Yemen's supervisory instruments to protect the banking sector from Houthi pressure; and prohibit banks and exchange companies involved in collecting Houthi levies or speculating with citizens' savings from operating.

Advancing International Judicial Accountability: Prepare comprehensive legal and criminal case files, supported by official Houthi documents and decisions and testimonies from affected employees and traders, and submit them to the United Nations Security Council, the Sanctions Committee, and international courts to establish the constituent elements of the crimes of systematic starvation and organized plunder committed by militia leaders.

SIXTH: OPERATIONAL ROADMAP MATRIX FOR DISMANTLING THE SYSTEM OF IMPOVERISHMENT

The following table summarizes the required intervention pathways to dismantle the Houthi militia's instruments of starvation and restore economic protection for civilians:

Target Entity	Required Operational Measure	Legal / Implementation Instrument	Expected Impact on Dismantling the System of Impoverishment
United Nations Security Council and the 2140 Sanctions Committee	Designate the militia's financial leadership—including the Judicial Custodian, the Zakat Authority, the Customs Authorities, and SCMCHA—as well as commercial cartels, for inclusion on sanctions lists.	Chapter VII of the United Nations Charter; Resolutions 2140 and 2417; asset freezes and travel bans.	Cut off profiteering networks that sustain the war effort and deter the administrative and judicial architects of confiscation and pillage.
UN Special Envoy and Sponsoring States	Impose a binding international mechanism requiring revenues from the ports of Hudaydah and the telecommunications sector to be deposited for salary payments, and close inland customs checkpoints.	Binding prerequisites in any economic roadmap; a trust account subject to UN oversight.	Restore the purchasing power of 1.2 million public employees and their families, and reduce food and medicine prices by abolishing double customs duties.
United Nations Agencies and Donors	End SCMCHA's supervisory control; adopt digital cash transfers and biometric identification; and exclude Houthi militia companies from contracts.	United Nations General Assembly Resolution 46/182; review of logistical contracting chains; automated aid distribution.	Ensure that food and cash reach the actual intended beneficiaries and prevent donor funds from being diverted to finance the Houthi militia's repressive apparatus.
Human Rights Council and International Judiciary	Establish an international criminal investigation and accountability mechanism incorporating a financial crimes unit, and activate universal jurisdiction.	Rome Statute (Articles 7 and 8); universal jurisdiction laws; cooperation with the Financial Action Task Force (FATF).	End impunity, establish the individual criminal responsibility of militia leaders, and recover plundered assets.
Yemeni Government and Central Bank	Establish a national registry of plundered assets, invalidate transactions involving those assets, and protect traders and the banking system.	National legislation; international banking supervision; legal notices to international chambers of commerce.	Protect private property and national capital, prevent the liquidation of confiscated assets, and secure the stability of supply chains.

ANNEX I:

DOCUMENTARY REGISTER OF ADMINISTRATIVE DECISIONS AND LEGISLATION ISSUED BY THE HOUTHI MILITIA TO LEGITIMIZE LEVIES AND ASSET CONFISCATION (2015–2026)

Methodological Introduction: The Use of Legislative and Judicial Instruments to Engineer Impoverishment

This documentary annex constitutes the legal and administrative database accompanying the study **"The Houthis and the Weaponization of Starvation: The Economics of Impoverishment and the Dismantling of Social Safety Nets,"** published by the American Center for Justice (ACJ). It documents the most significant decisions, regulations, legislative amendments, and circulars issued by the Houthi militia through the executive, legislative, and judicial institutions under its control in Sana'a.

These documents reveal that plunder, wage confiscation, the dismantling of the private sector, and the escalation of food and medicine prices are carried out through a written and codified system. The Houthi militia has deliberately manipulated legal provisions and issued exceptional regulations to provide a procedural veneer for coercive levies and the transfer of private and public assets into its war coffers. These decisions, published through the militia's official media outlets and the so-called *Official Gazette* in Sana'a, provide compelling documentary evidence of the *actus reus* (material elements) and *mens rea* (prior criminal intent) of Houthi militia leaders in committing the crimes of systematic starvation and organized plunder.

FIRST: DECISIONS AND AMENDMENTS GOVERNING NEWLY INTRODUCED LEVIES AND DOUBLE TAXATION AND CUSTOMS DUTIES

1. Decision No. 53/54 of 2018 on the Establishment of the "General Authority for Zakat" (May 2018)

- **Issuing Authority:** The so-called "Supreme Political Council" affiliated with the Houthi militia.
- **Procedural Substance:** The decision stipulated the separation of zakat collection and disbursement from the Ministry of Local Administration and local councils in the governorates, in violation of Local Authority Law No. 4 of 2000 and Zakat Law No. 2 of 1999,[39] and the establishment of an independent central authority directly answerable to the militia's Supreme Political Council president. It also granted the authority powers of judicial enforcement and executive attachment over the assets of businesspeople and farmers.
- **Economic and Livelihood Impact:** The centralization of hundreds of billions of Yemeni rials annually in the hands of the militia's leadership; the deprivation of governorates and districts of their local revenues allocated to public services; the criminalization of direct zakat distribution by businesspeople and traders to poor families; and the diversion of zakat funds to finance combat fronts and mobilization activities.

2. Decision No. 100 of 2020 Issuing the Executive Regulations of the Zakat Law[40] — The "Khums" Regulation (May 2020)

- **Issuing Authority:** The head of the so-called "Supreme Political Council" of the Houthi militia.
- **Procedural Substance:** Articles 47 to 54 of the regulations imposed a **20% levy (khums, or one-fifth)** on revenues derived from natural, mineral, and marine resources—including oil, gas, gold, minerals, fish, and honey—as well as economic and commercial activities, factories, and groundwater resources. The regulations divided the proceeds of this levy into six shares, most of which were allocated to a specific

39 Local Authority Law No. 4 of 2000 and Zakat Law No. 2 of 1999 provide that zakat is a local revenue collected and disbursed within the administrative units and local councils of the governorates for the benefit of the poor and needy. National Information Center: https://yemen-nic.info/db/laws_ye/detail.php?ID=11755

40 Articles 47–54 of the regulations imposed a khums levy of 20% on wealth and economic activities for the benefit of a specific lineage-based group, in explicit violation of Articles 18, 24, and 41 of the Constitution of the Republic of Yemen and the International Convention on the Elimination of All Forms of Racial Discrimination. https://yemen-nic.info/Yemen/dostor.php

social group on the basis of lineage, under the designation "Bani Hashim."

- **Economic and Livelihood Impact:** The legal entrenchment of racial and lineage-based discrimination in the distribution of national wealth; the imposition of a burdensome feudal-style tax that depleted domestic capital in the agricultural, fishing, mining, and food-processing sectors; and increases in the prices of essential commodities as businesses passed on the cost of the levy to consumers.

3. Law No. 8 of 2020 Amending Income Tax Law No. 17 of 2010[41] (May 2020)

- **Issuing Authority:** The de facto House of Representatives in Sana'a, with approval by the militia's Supreme Political Council.
- **Procedural Substance:** The law amended provisions of the Income Tax Law and the sales and real estate tax laws to broaden the tax base, lower tax-exemption thresholds for small businesses and individuals, impose taxes on total sales and revenues regardless of whether a profit or loss was incurred, increase penalties for late payment, and require property landlords to pay increased monthly taxes equivalent to one to two months' rent annually.
- **Economic and Livelihood Impact:** A sharp increase in residential and commercial rents in Sana'a and other governorates under militia control; the bankruptcy and closure of thousands of small commercial and craft enterprises unable to meet arbitrary tax assessments; and increases in food and medicine prices resulting from real estate and commercial taxes.

4. Various Decisions Establishing Inland Land Customs Checkpoints and Increasing Customs Tariffs (2018–2025)

- **Issuing Authority:** The Ministry of Finance and the Customs Authority, both operating under the control of the Houthi militia in Sana'a.
- **Procedural Substance:** Establishment of inland land customs checkpoints at entry points to governorates under Houthi militia control, including Afar in Al-Bayda Governorate, Dhamar, Maytam in Ibb Governorate, Al-Rahda in Taiz Governorate, and checkpoints in Al-

41 Issuance of Law No. 8 of 2020 Amending the Income Tax Law: https://yemen-yba.com/8028/%D8%B5%D8%AF%D9%88%D8%B1-%D8%A7%D9%84%D9%82%D8%A7%D9%86%D9%88%D9%86-%D8%B1%D9%82%D9%85-8-%D9%84%D8%B3%D9%86%D8%A9-2020%D9%85-%D8%A8%D8%A-A%D8%B9%D8%AF%D9%8A%D9%84-%D9%82%D8%A7%D9%86%D9%88%D9%86-%D8%B6

Jawf. The authorities also issued decisions increasing customs duties and taxes by between 50% and 100%—including tariff increases in January 2023 and March 2025—on food, medicines, and essential goods that had already undergone customs clearance and received authorization at the state's official ports and entry points.

- **Economic and Livelihood Impact:** The imposition of unlawful double customs duties within a single country; the detention of thousands of trucks carrying food and medicine at newly established checkpoints for weeks, resulting in cargo spoilage; and increased land-transport costs and higher prices for flour, rice, milk, and medicines for Yemeni households.

5. Decision Establishing the "General Authority for Endowments"[42] (2020) and Decision No. 43 of 1447 AH Concerning the "General Authority for Endowments and Guidance" (August 2025)

- **Issuing Authority:** The head of the so-called "Supreme Political Council" of the Houthi militia.
- **Procedural Substance:** Abolition of the Ministry of Endowments and Guidance and establishment of an independent authority reporting directly to the militia's Supreme Political Council president. The authority was granted broad powers to seize endowment and private land and real estate, cancel longstanding usufruct agreements held by citizens, farmers, and businesspeople, impose substantially increased rents and financial charges retroactively, and use security forces to evict occupants from commercial premises and homes.
- **Economic and Livelihood Impact:** Confiscation of thousands of hectares of agricultural land and commercial and residential properties; displacement of hundreds of families and farmers; and diversion of endowment revenues—which are designated under religious and legal principles for public welfare and the benefit of the poor and sick—into a substantial source of funding for the militia's war effort and sectarian activities.

42 Republican Decree Establishing the General Authority for Endowments and Guidance: https://www.saba.ye/ar/news3538106.htm

SECOND: DECISIONS AND RULINGS GOVERNING ASSET CONFISCATION AND BANKING AND MONETARY PLUNDER

1. Decisions Establishing and Empowering the "Judicial Custodian" and Orders of the Specialized Criminal Court (2017–2026)

- **Issuing Authority:** The Ministry of Justice, the Judicial Council, and the Specialized Criminal Court and Specialized Criminal Prosecution operating under the militia's control in Sana'a.
- **Procedural Substance:** Establishment of a parallel entity known as the "Judicial Custodian," led by Houthi security operatives, and procurement of hundreds of purportedly sham judicial orders from the Specialized Criminal Court authorizing the provisional seizure and final confiscation of the funds, property, companies, banks, factories, universities, hospitals, and homes belonging to businesspeople, entrepreneurs, politicians, journalists, and displaced persons, on the basis of allegedly fabricated charges relating to "espionage" or "national treason."
- **Economic and Livelihood Impact:** Seizure of commercial, real estate, and banking assets estimated to be worth billions of dollars; destruction of the investment climate; displacement of independent domestic capital; replacement of independent businesses with monopolistic companies affiliated with Houthi militia leaders that control the importation and pricing of food, fuel, and medicine; and the dismissal of thousands of employees from confiscated institutions.

2. Circulars Issued by the Sana'a Branch of the Central Bank Prohibiting the Circulation of the Official National Currency[43] (December 2019 – January 2020)

- **Issuing Authority:** The branch of the Central Bank of Yemen in Sana'a, operating under the control of the Houthi militia.
- **Procedural Substance:** Issuance of security and banking decisions and circulars on 18 December 2019 prohibiting the circulation or possession of official banknotes issued by the Central Bank of Yemen after 2016. These measures compelled citizens and businesspeople to surrender any such banknotes in their possession for confiscation,

43 Circular issued on 18 December 2019 prohibiting the circulation of official banknotes issued by the Central Bank of Yemen after 2016, in violation of Article 9 of the Constitution and Central Bank of Yemen Law No. 14 of 2000. https://yemen-nic.info/db/laws_ye/detail.php?ID=11761

while imposing stringent security monitoring on exchange networks and financial transfers between governorates.

- **Economic and Livelihood Impact:** Division of Yemen's monetary and banking system into two distinct currency zones; creation of a severe liquidity crisis and deterioration of older banknotes in areas under militia control; and imposition of exorbitant fees and exchange-rate differentials on domestic remittances, reducing by between 40% and 50% the value of funds and savings sent by workers and expatriates to support their families.

3. Law No. 4 of 1444 AH, Known as the "Law on the Prohibition of Usurious Transactions" (March 2023)[44]

- **Issuing Authority:** The de facto House of Representatives in Sana'a, with the approval of the president of the militia's Supreme Political Council (22–23 March 2023).
- **Procedural Substance:** The 13-article law prohibited and retroactively nullified all banking transactions and interest payments at commercial and Islamic banks and financial institutions. It also extinguished the Houthi militia authorities' obligations to pay interest and returns on domestic public debt, including Treasury bills and government bonds, and compelled banks to convert citizens' and business people's investment and savings deposits into non-interest-bearing current accounts.
- Economic and Livelihood Impact: Legitimizing the plunder and confiscation of depositors' funds and citizens' savings held in Yemeni banks, as well as the confiscation of investment returns on pension and social insurance funds deposited in Treasury bills—which had been used to finance retirees' pensions—and crippling the banking sector in Sana'a, leaving it unable to repay small depositors and traders.

44 Issued on 22–23 March 2023 by the de facto parliament and the Supreme Political Council in Sana'a, the law retroactively nullified banking interest and returns, including returns on Treasury bills, and confiscated depositors' funds and pension funds, in violation of Banking Law No. 38 of 1998. https://www.saba.ye/ar/news3230202.htm

THIRD: DECISIONS REGULATING WAGE CONFISCATION AND THE SUBORDINATION OF PUBLIC EMPLOYMENT

1. Decisions to Suspend Salary Payments and Confiscate Pension Reserves and the Stockholm Agreement Account[45] (2016–2020)

- **Issuing Authority:** The militia's Supreme Political Council, the Ministry of Finance, and the Central Bank branch in Sana'a.
- **Procedural Substance:** The blanket administrative suspension of monthly salary payments to employees of the state's administrative apparatus beginning in September 2016; the issuance of orders to withdraw and seize the cash balances of the Civil and Military Pension Fund, the General Organization for Social Insurance, and the Social Welfare Fund; and the unilateral issuance, in early 2020, of an order to withdraw more than **YER 35 billion** from the "Special Account for Employees' Salaries" at the Central Bank branch in Hudaydah. This account had been established under the Stockholm Agreement to deposit revenues from Hudaydah's ports under UN supervision.
- **Economic and Livelihood Impact:** Depriving more than 1.2 million government employees and their families—approximately 8 million people—of their lawful source of income; driving the middle class into extreme poverty; and undermining the UN mechanism established to disburse salaries from port revenues.

2. Issuance of the "Code of Conduct and Work Ethics in Public Service Units" (November 2022)

- **Issuing Authority:** The president of the militia's Supreme Political Council and its unrecognized government in Sana'a (7 November 2022).
- **Procedural Substance:** Imposition of a mandatory ideological and security-oriented code on all civil servants, requiring them to sign a declaration pledging adherence to the Houthi militia leader's ideological and political doctrine, known as the "Qur'anic March" and the principle of *Wilayah* (guardianship). The code also requires employees to attend sectarian cultural courses and participate in mobilization events, while granting Houthi militia supervisors the authority to evaluate employees, dismiss them, and deprive them of

45 The blanket administrative suspension of salary payments beginning in September 2016 and the withdrawal of more than YER 35 billion from the Stockholm Agreement salary account at the Central Bank branch in Hudaydah in early 2020. See the Report of the Panel of Experts on Yemen (S/2021/79): https://www.securitycouncilreport.org/atf/cf/%7B65BFCF9B-6D27-4E9C-8CD3-CF6E4FF96FF9%7D/S_2021_79.pdf

their employment rights.

- **Economic and Livelihood Impact:** Making the right to employment and wages conditional on political and sectarian loyalty; carrying out widespread purges and employment-based exclusion affecting tens of thousands of teachers, doctors, judges, and administrative employees; and replacing them with Houthi militia members in their positions and salary grades.

3. Law No. 5 of 1445 AH on the "Exceptional Temporary Mechanism to Support the Salary Bill of State Employees" (March 2024)[46]

- **Issuing Authority:** The de facto House of Representatives in Sana'a, with the approval of the militia's Supreme Political Council.
- **Procedural Substance:** Enactment of legislation that absolves the Houthi militia of its obligation to pay full monthly salaries and accumulated arrears owed to employees since 2016 from state revenues, replacing these payments with "exceptional incentives"—equivalent to half a month's salary every few months for selected categories of employees subject to biometric verification and loyalty requirements. The law also stipulates that these partial payments are to be financed through newly imposed additional taxes and customs levies on goods and services purchased by citizens.
- **Economic and Livelihood Impact:** Depriving employees of their legal entitlement to accumulated wages and financing partial payments to certain employees out of citizens' own pockets through increases in the prices of food, fuel, and telecommunications services, while trillions of Yemeni rials in sovereign revenues remain exclusively allocated to the war effort.

46 Enacted in March 2024, the law was intended to extinguish the obligation to pay salary arrears accumulated since 2016 and replace them with partial incentives financed through additional tax and customs levies on goods, in violation of Wages and Salaries Law No. 43 of 2005. https://saba.ye/ar/news3440449.htm

FOURTH: DECISIONS GOVERNING SECURITY CONTROL OVER HUMANITARIAN AND RELIEF OPERATIONS

1. Decision No. 87 of 2017 and Decision No. 201 of 2019[47] Establishing the SCMCHA Council (November 2019)

- **Issuing Authority:** The president of the Houthi militia's Supreme Political Council in Sana'a (6 November 2019).
- **Procedural Substance:** The 24-article decision established the "Supreme Council for the Management and Coordination of Humanitarian Affairs and International Cooperation" (SCMCHA), replacing the authority established under Decision No. 87 of 2017, and placed its administration under leaders from the militia's Security and Intelligence Service. The decision granted this body sweeping powers to control all activities of the United Nations and international and local organizations, required prior permits for any field movement, curtailed organizations' right to conduct independent assessment surveys, imposed beneficiary lists prepared by militia supervisors, and required the signing of project agreements that included financial deductions for the militia.
- **Economic and Livelihood Impact:** Diverting international food and cash assistance from its humanitarian purpose to benefit the families of Houthi militia fighters and finance its fronts; depriving millions of poor, displaced, and non-aligned families of their food allocations; and forcing the World Food Programme and other relief agencies to scale back or suspend assistance as a result of extortion and obstruction.

2. Decision to Dissolve SCMCHA and Integrate It into the Houthi-Controlled Ministry of Foreign Affairs (October 2024)

- **Issuing Authority:** The president of the Houthi militia's Supreme Political Council in Sana'a.
- **Procedural Substance:** Transferring the functions, powers, and personnel of the Supreme Council for the Management and Coordination of Humanitarian Affairs (SCMCHA) to a newly established department within the Ministry of Foreign Affairs and Expatriates of

47 Decision No. 201 of 2019, issued on 6 November 2019, established the Supreme Council for the Management and Coordination of Humanitarian Affairs (SCMCHA) and imposed security and intelligence oversight over the activities of the United Nations and international organizations. https://www.hrw.org/ar/report/2020/09/14/376259

the militia's government, amid an expansion of campaigns involving the abduction and enforced disappearance of dozens of UN and international staff members and the seizure of organizational assets.

- **Economic and Livelihood Impact:** A procedural maneuver to circumvent international pressure and threats to impose sanctions on SCMCHA leaders, while effectively retaining the same security and intelligence apparatus that controls beneficiary lists, imposes levies, and restricts humanitarian operations.

FIFTH: COMPREHENSIVE DOCUMENTATION TABLE OF HOUTHI DECISIONS AND THEIR LEGAL CLASSIFICATION

Number and Date of Houthi Decision / Legislation	Official Title of the Decision / Regulation	Practical Effect (Levies / Confiscation)	**Conflict with the Yemeni Constitution and Law**	**Corresponding Violation under International Law**
Salary Suspension and Pension Balance Withdrawal Decisions (September 2016 – January 2020)	Administrative decisions to withhold salary payments and withdraw funds from the Stockholm Agreement account.	Confiscation of the wages of 1.2 million employees, retirees' pensions, and social welfare allocations.	Violation of Articles 29 and 56 of the Constitution; Civil Service Law No. 19 of 1991; and Pensions and Insurance Law No. 25 of 1991.	War crime (starvation of civilians—Article 14 of Additional Protocol II and Article 8(2)(e)(xix) of the Rome Statute); violation of Articles 6, 7, and 9 of the International Covenant on Economic, Social and Cultural Rights (ICESCR).
Decision No. 53/54 of 2018 (May 2018)	Decision establishing the so-called "General Authority for Zakat."	Centralization of zakat funds, criminalization of independent charitable distribution, and diversion of zakat proceeds to the war effort.	Violation of Local Authority Law No. 4 of 2000 and Zakat Law No. 2 of 1999.	Crime of systematic plunder; deprivation of poor people of social safety nets (violation of Article 11 of the ICESCR).
Specialized Criminal Court Orders and "Judicial Custodian" Decisions (2017–2026)	Precautionary seizure and confiscation orders targeting the assets of opponents and businesspeople.	Confiscation of hundreds of companies, banks, universities, hospitals, and private real estate for the benefit of the militia.	Violation of Articles 7 and 20 of the Yemeni Constitution, which prohibit the general confiscation of property and safeguard private ownership.	War crime (systematic pillage—Article 33 of the Fourth Geneva Convention and Article 8(2)(e)(v) of the Rome Statute); crime against humanity (persecution—Article 7(1)(h) of the Rome Statute).
Decision No. 201 of 2019 (November 2019), as amended in October 2024	Establishment of the so-called "Supreme Council for the Management and Coordination of Humanitarian Affairs" (SCMCHA).	Imposition of security oversight over international relief operations, manipulation of beneficiary lists, and extortion of humanitarian organizations.	Violation of international agreements concluded between the Republic of Yemen and the United Nations and its specialized agencies.	War crime (deliberately obstructing relief supplies—Article 8(2)(e)(xix) of the Rome Statute); violation of UN Security Council Resolution 2417 and Rules 55 and 56 of customary international humanitarian law.

Number and Date of Houthi Decision / Legislation	Official Title of the Decision / Regulation	Practical Effect (Levies / Confiscation)	**Conflict with the Yemeni Constitution and Law**	**Corresponding Violation under International Law**
Circulars Issued by the Sana'a Branch of the Central Bank (December 2019)	Decision prohibiting the circulation of official banknote issues of the national currency.	Confiscation of citizens' funds, fragmentation of the monetary system, and deductions amounting to approximately 50% of the value of domestic remittances.	Violation of Article 9 of the Constitution and Central Bank of Yemen Law No. 14 of 2000, which grants the official Central Bank exclusive authority over currency issuance.	Collective punishment; plunder of civilians' savings; destruction of economic access to food (Article 11 of the ICESCR).
Decision No. 100 of 2020 (May 2020)	Executive Regulations of the Zakat Law (the 20% "Khums" Regulation).	Imposition of a 20% levy on wealth and economic activities for the benefit of a specific lineage-based group ("Bani Hashim").	Explicit violation of Articles 24 and 41 of the Yemeni Constitution, which guarantee equality and equal opportunities, and Article 18, which prohibits the imposition of any tax or fee except by law.	Crime against humanity (persecution and discrimination on the grounds of lineage and birth—Article 7(1)(h) of the Rome Statute); violation of the International Convention on the Elimination of All Forms of Racial Discrimination.
Law No. 8 of 2020 and Customs Decisions (2018–2025)	Amendment of the Income Tax Law and establishment of inland customs checkpoints.	Increased taxes on businesspeople and real estate, and the imposition of double customs duties of 50%–100% on food and medicine.	Violation of the Constitution and Customs Law No. 14 of 1990, which prohibits the establishment of inland customs checkpoints between the governorates of the Republic.	Impairment of objects indispensable to civilian survival (Article 14 of Additional Protocol II); violation of General Comment No. 12 of the Committee on Economic, Social and Cultural Rights.
Code of Conduct for Public-Sector Employees (November 2022)	Code of Conduct and Work Ethics in the Public Service.	Making public employment and wages conditional on sectarian loyalty, dismissing employees, and replacing them with militia-affiliated personnel.	Violation of the Constitution and Civil Service Law No. 19 of 1991, which safeguard the neutrality of public service and equal opportunities.	Political and ideological persecution; violation of the right to work without discrimination (Articles 2 and 6 of the ICESCR).
Law No. 4 of 1444 AH (March 2023)	Law on the "Prohibition of Usurious Transactions."	Confiscation of bank deposits and extinguishment of Houthi militia debts owed to banks, pension funds, and social insurance funds.	Violation of the Constitution, Banking Law No. 38 of 1998, the Civil Code, and the principle of non-retroactivity of laws.	Systematic plunder of private assets and social insurance funds; destruction of the civilian financial and banking system.
Law No. 5 of 1445 AH (March 2024)	Law on the "Temporary Exceptional Mechanism to Support the Salary Bill."	Cancellation of salary arrears accumulated since 2016 and conditioning the payment of partial incentives on the imposition of new levies on consumers.	Violation of the Constitution, the Civil Service Law, and the Wages and Salaries Law No. 43 of 2005.	Legalization of wage confiscation; shifting the cost of war-related levies onto impoverished and hungry civilians.

SIXTH: EVIDENTIARY VALUE OF THE ANNEX IN INTERNATIONAL JUDICIAL PROCEEDINGS

1. **The documents and decisions** documented in this annex carry significant legal and criminal evidentiary weight when submitted to international investigative bodies, the UN Security Council Sanctions Committee, and competent courts. Their significance lies in two legal respects:

2. **Absolute Constitutional and Legal Nullity:** All these laws, decisions, regulations, and judicial rulings were issued by an illegitimate coup authority through an expired parliament lacking the constitutionally required quorum in Sana'a, in explicit violation of the provisions of the Constitution of the Republic of Yemen—particularly Articles 7, 18, 20, 24, and 41—and the applicable national legislation. Under domestic and international law, these decisions, together with the resulting confiscations of funds, real estate, and companies, are absolutely null and void, as if they had never existed. The perpetrators are therefore required to return the unlawfully seized assets and compensate the victims.

3. **Documentary Evidence of Criminal Intent and Individual Responsibility:** In international criminal proceedings, establishing the *mens rea* (criminal intent and systematic planning) represents one of the most significant challenges in prosecuting war crimes and crimes against humanity. The fact that Houthi militia leaders have documented policies of impoverishment and plunder, increased levies on food, and obstruction of humanitarian relief in legal texts, administrative decisions, and judicial rulings bearing their official signatures and seals provides compelling documentary evidence. Such evidence relieves international prosecution and investigative bodies of the burden of searching for indirect or circumstantial evidence and places the signatories and implementers of these decisions at risk of direct individual criminal liability under Articles 25 and 28 of the Rome Statute of the International Criminal Court, as well as under the sanctions criteria established by UN Security Council Resolutions 2140 and 2417.

LEGAL BRIEFING MEMORANDUM AND REQUEST FOR INCLUSION ON INTERNATIONAL SANCTIONS LISTS

To: The Chair and Members of the Security Council Committee Established Pursuant to Resolution 2140 (2014) Concerning Yemen

To: The Coordinator and Members of the United Nations Security Council Panel of Experts on Yemen

From: The American Center for Justice (ACJ)

Date: 17 October 2026

Subject: Legal Briefing Memorandum and Evidentiary Dossier Seeking the Listing of Houthi Militia Leaders and Affiliated Economic, Judicial, and Security Entities under International Sanctions Regimes for Their Involvement in the Starvation of Civilians, Systematic Plunder, and Obstruction of Humanitarian Assistance

FIRST: PURPOSE OF THE MEMORANDUM AND LEGAL BASIS OF JURISDICTION

The American Center for Justice (ACJ) hereby submits this formal legal memorandum, accompanied by the findings of its analytical study entitled **"The Authority of Starvation: The Economics of Impoverishment and the Dismantling of Social Safety Nets,"** to the Security Council Committee established pursuant to Resolution 2140 (2014) and its Panel of Experts. The memorandum calls for the activation of the coercive measures provided for under Chapter VII of the Charter of the United Nations, namely asset freezes and travel bans, against the administrative, financial, and judicial network responsible for operating the system of systematic impoverishment and starvation in areas under the control of the Houthi militia.

This memorandum's legal characterization is based on the binding listing criteria established by the United Nations Security Council in its relevant resolutions concerning Yemen and the protection of civilians in armed conflict. These resolutions empower the Committee to impose sanctions directly on the financial and administrative architects of policies of starvation and plunder, on the basis of the following legal grounds:

Threats to Peace, Security, and Stability in Yemen (Paragraph 17 of Resolution 2140 (2014)): The looting of the State's sovereign revenues, the

confiscation of pension and social insurance funds, and the imposition of coercive levies on food and fuel supply chains constitute activities that finance the continued military operations of the Houthi militia, undermine State institutions and the national economy, and prolong the armed conflict.

Planning or Directing Acts that Violate International Humanitarian Law or Human Rights Law (Paragraph 18(c) of Resolution 2140 (2014)): The deliberate failure to pay the salaries of 1.2 million public-sector employees since 2016, despite the collection of trillions of Yemeni rials annually in revenues, the doubling of customs duties and taxes on food and medicine, and the confiscation of private property through sham judicial rulings constitute grave violations of Article 14 of Additional Protocol II to the Geneva Conventions, which prohibits the starvation of civilians as a method of combat and the destruction or removal of objects indispensable to their survival. These acts may also fall within the scope of Articles 8(2)(e)(v) and 8(2)(e)(xix) of the Rome Statute of the International Criminal Court, concerning war crimes involving pillage and the use of starvation of civilians as a method of warfare, and Article 7(1)(h), concerning the crime against humanity of persecution. Furthermore, they violate Articles 6, 7, 9, and 11 of the International Covenant on Economic, Social and Cultural Rights.

Obstructing the Delivery, Access to, or Distribution of Humanitarian Assistance in Yemen (Paragraph 18(e) of Resolution 2140 (2014) and Resolution 2216 (2015)): This violation is evidenced by documented practices attributed to the "Supreme Council for the Management and Coordination of Humanitarian Affairs" (SCMCHA) and its alternative administrative structures within the Houthi militia's Ministry of Foreign Affairs. These practices include detaining humanitarian aid convoys, manipulating beneficiary lists for political purposes to deny assistance to families perceived as opposition supporters and divert food supplies to combatants, imposing levies on UN agencies and organizations, and abducting and forcibly disappearing dozens of humanitarian personnel.

Using Starvation of Civilians as a Method of Warfare (UN Security Council Resolution 2417 (2018)): In Resolution 2417 (2018), the Security Council affirmed that the use of starvation of civilians as a method of warfare and the unlawful denial of humanitarian access warrant the imposition of direct international sanctions on the individuals and entities responsible for such practices.

SECOND: DISSECTION OF THE INSTITUTIONAL AND FINANCIAL ARMS OF THE HOUTHI NETWORK UNDER INVESTIGATION

The documentary evidence and administrative and legislative decisions examined by the American Center for Justice demonstrate that the Houthi militia operates its war and starvation economy through an interconnected institutional network in which responsibilities are distributed among four executive arms:

The Revenue-Extraction Arm (Confiscating Income and Increasing the Cost of Food): This arm comprises the "General Authority for Zakat," the "General Authority for Endowments," and the Tax and Customs Authorities. These bodies are responsible for implementing the *Khums* (one-fifth, or 20%) levy, establishing internal land customs checkpoints that impose duplicate customs duties ranging from 50% to 100% on food and pharmaceutical goods, and appropriating agricultural land and endowment properties.

The Judicial and Security Arm (Asset Plunder and the Dismantling of the Private Sector): This arm comprises the Specialized Criminal Court and Specialized Criminal Prosecution in Sana'a, as well as the "Judicial Custodian" apparatus. It is responsible for issuing and enforcing precautionary seizure orders and final confiscation rulings targeting hundreds of commercial companies, banks, factories, universities, and private hospitals, and for replacing them with monopolistic companies affiliated with militia leaders.

The Monetary and Banking Arm (Confiscation of Wages and Savings): This arm is centered in the Sana'a branch of the Central Bank of Yemen, which is under the militia's control, and its affiliated Ministry of Finance. It is responsible for confiscating the reserves of pension and social insurance funds, withholding salary payments, prohibiting the circulation of the official national currency, and implementing what is known as the "Law Prohibiting Usurious Transactions" to confiscate citizens' bank deposits and returns on retirees' savings.

The Intelligence Arm for Control of Humanitarian Assistance: This arm consists of the "Supreme Council for the Management and Coordination of Humanitarian Affairs" (SCMCHA), the newly established International Cooperation Sector within the Houthi militia's Ministry of Foreign Affairs, and the Security and Intelligence Service. It is responsible for imposing restrictive oversight on UN agencies, diverting international aid, and abducting humanitarian workers.

THIRD: LIST OF HOUTHI LEADERS PROPOSED FOR DESIGNATION UNDER INTERNATIONAL SANCTIONS (INDIVIDUALS)

Table of Houthi Leaders Proposed for Inclusion on International Sanctions Lists (Individuals)

No.	Name and organizational role	Documented alleged conduct and implementing decisions	Applicable designation criteria (Resolutions 2140 and 2417)
1	Shamsan Mohsen Abu Nashtan[48] — Head of the so-called General Authority for Zakat	Directly overseeing implementation of Decision No. 100 of 2020 (the 20% Khums regulation); coercively collecting hundreds of billions of Yemeni rials from traders and farmers through military intimidation; criminalizing independent charitable activities; and diverting zakat funds intended for the poor to finance fighting fronts and sectarian activities.	Paragraph 17 (financing the war and undermining stability); paragraph 18(c) (violations of international humanitarian law and deprivation of civilians of essential means of survival).
2	Hashim Ismail Ali Al-Mu'ayyad[49] — Purported Governor of the Central Bank of Yemen in Sana'a	Issuing and circulating decisions prohibiting the official national currency; fragmenting the banking system and imposing fees that allegedly consumed approximately 50% of remittances from Yemenis abroad; confiscating pension and social insurance fund balances and the salary account associated with the Stockholm Agreement; and implementing Law No. 4 of 1444 AH to confiscate bank deposits. Already designated by the United States; proposed here for UN designation.	Paragraph 17 (undermining the national economy and financing the conflict); paragraph 18(c) (participation in the alleged starvation of civilians through the confiscation of wages and savings).
3	Abdulmajid Abdulrahman Al-Houthi — Head of the so-called General Authority for Endowments and Guidance	Leading the alleged forcible seizure of thousands of hectares of agricultural land and commercial and residential properties; cancelling longstanding usufruct agreements held by citizens and farmers; retroactively increasing rents; using armed force to evict shopkeepers and residents; and diverting endowment revenues to the war effort.	Paragraph 17; paragraph 18(c) (systematic plunder of private and public property and destruction of agricultural and commercial livelihoods).
4	Ahmed Mohammed Yahya Hamid,[50] known as "Abu Mahfouz" — Director of the Office of the Presidency of the Houthi Political Council and senior supervisor of the humanitarian aid and revenue-collection system	Allegedly directing policies controlling humanitarian operations through effective oversight of SCMCHA; issuing high-level instructions to manipulate UN humanitarian aid beneficiary lists; enforcing a code of conduct for public employees to exclude civil servants; and managing networks profiting from humanitarian assistance.	Paragraph 18(e) and Resolution 2417 (systematic obstruction of humanitarian aid delivery and distribution); paragraph 18(c) (political and employment-related persecution).

48 Shamsan Mohsen Abu Nashtan: According to the memorandum, he was appointed head of the so-called General Authority for Zakat in Sana'a under Decision No. 54 of 2018 and directly supervised implementation of the Khums Regulation No. 100 of 2020 and the collection of hundreds of billions of Yemeni rials to finance fighting fronts. https://www.saba.ye/ar/news496200.htm

49 Hashim Ismail Ali Al-Mu'ayyad: The memorandum states that he was appointed Governor of the Central Bank's Sana'a branch by the Houthi authorities and designated by the US Treasury's Office of Foreign Assets Control (OFAC) on 17 January 2025 for his alleged role in managing the militia's financial networks, asset confiscation, and military financing. https://home.treasury.gov/news/press-releases/jy2788

50 Ahmed Mohammed Yahya Hamid ("Abu Mahfouz"): The memorandum cites reports by the UN Security Council Panel of Experts on Yemen as documenting his role as the senior de facto supervisor of SCMCHA and the system of restrictions and alleged extortion imposed on UN agencies and humanitarian organizations. https://www.securitycouncilreport.org/atf/cf/%7B65BFCF9B-6D27-4E9C-8CD3-CF6E4FF96FF9%7D/S_2021_79.pdf

No.	Name and organizational role	Documented alleged conduct and implementing decisions	Applicable designation criteria (Resolutions 2140 and 2417)
5	Abdulmohsen Abdullah Al-Tawus — Secretary-General of SCMCHA and senior official overseeing relations with international organizations	Directly implementing policies allegedly involving the extortion of UN agencies and international organizations; imposing financial deductions on humanitarian project grants; detaining food and medicine shipments by withholding permits; and engaging in security-related incitement that allegedly paved the way for the abduction and enforced disappearance of UN and humanitarian organization personnel.	Paragraph 18(e) and Resolution 2417 (obstruction of humanitarian access, diversion of aid, and attacks on humanitarian personnel).
6	Ahmed Yahya Jarfan,[51] together with executive officials of the Judicial Custodian apparatus, including Qasim Al-Dhamari and individuals allegedly impersonating judicial custodians	Managing the executive apparatus of the Judicial Custodian, described as an extension of the network of internationally designated official Saleh Mesfer Al-Shaer; carrying out raids and armed seizures targeting hundreds of companies, banks, universities, hospitals, and food and pharmaceutical factories; and managing confiscated assets to finance military operations.	Paragraph 17; paragraph 18(c) (alleged war crime of pillage and economic and political persecution).
7	Yahya Abdulkarim Al-Mansour, Abdullah Al-Kumaim, and Mohammed Muflih — Presiding officials and judges of the Specialized Criminal Court and Specialized Criminal Prosecution in Sana'a	Allegedly manipulating judicial proceedings to issue hundreds of sham precautionary seizure orders and final confiscation rulings against the assets, property, businesses, and homes of traders, politicians, journalists, and displaced persons without fair trials, thereby providing judicial cover for seizures carried out by the Judicial Custodian.	Paragraph 18(c) (violations of international human rights law and international humanitarian law through the alleged legitimization of systematic plunder and persecution).
8	Abduljabbar Ahmed Mohammed, purported head of the Tax Authority, and Adel Margham, purported head of the Customs Authority	Establishing and operating newly introduced inland customs checkpoints between governorates, including in Dhamar, Afar, Al-Rahda, and Maytam; imposing duplicate customs duties of 50–100% on food and pharmaceutical goods; detaining commercial trucks to extort traders; and implementing allegedly onerous tax amendments that increased food prices.	Paragraph 17; paragraph 18(c) and Resolution 2417 (obstructing access to goods indispensable to civilian survival and financing the war through levies on food).

51 Ahmed Yahya Jarfan and Qasim Al-Dhamari: The memorandum identifies them as managing the executive arm of the Judicial Custodian apparatus, allegedly extending the network of Houthi official Saleh Mesfer Al-Shaer, who was designated under UN Security Council Resolution 2140 on 9 November 2021 (YEi.009) in connection with the confiscation of private companies and property. https://main.un.org/securitycouncil/ar/sanctions/2140/materials/summaries/individual/saleh-mesfer-saleh-al-shaer

FOURTH: ENTITIES, INSTITUTIONS, AND FRONT COMPANIES PROPOSED FOR INCLUSION (ENTITIES)

The Judicial Custodian Office and System in Sana'a and the Companies Under Its Management: This entity serves as the financial and executive arm responsible for managing billions of dollars' worth of assets seized from the private sector, including confiscated companies used as fronts to finance the militia's military operations.

The So-Called "General Authority for Zakat" and "General Authority for Endowments and Guidance" in Sana'a: These are described as newly established institutions operating outside the constitutional and legal framework of the Republic of Yemen. They function as parallel financial funds used to appropriate the community's wealth (through the khums levy and land confiscations), finance the war effort and sectarian activities, and deprive the poor of social safety nets.

The So-Called "Supreme Council for the Management and Coordination of Humanitarian Affairs" (SCMCHA) and the Alternative International Cooperation Sector within the Militia's Ministry of Foreign Affairs: This institutional entity is implicated in obstructing humanitarian operations, extorting international organizations, diverting UN aid to benefit combatants, and coordinating with the Security and Intelligence Service to abduct humanitarian aid workers.

Companies Importing Petroleum Products and Food, and Financial Intermediation Companies Affiliated with Militia Leaders: This includes a network of commercial and petroleum companies, as well as money exchange firms owned or managed through intermediaries acting on behalf of Houthi militia leaders, particularly networks linked to Houthi leaders Mohammed Abdulsalam, Daghsan Ahmed Daghsan, and Ali Qersha. These companies have been granted a coercive monopoly over the importation of fuel and essential commodities following the elimination of independent traders, and are used to impose monopoly pricing on fuel and food and finance military armament.

FIFTH: PROCEDURAL REQUESTS OF THE AMERICAN CENTER FOR JUSTICE TO THE SANCTIONS COMMITTEE AND THE PANEL OF EXPERTS

Pursuant to the mandate of the Sanctions Committee established under Resolution 2140 and the responsibilities of the Panel of Experts on Yemen, the American Center for Justice respectfully requests that the following practical measures be taken:

Initiation of a Specialized Criminal and Financial Investigation: The relevant financial, economic, and international humanitarian law experts on the Panel of Experts should be tasked with conducting an extensive investigation into the "systematic impoverishment framework and the militarization of food supply chains" in areas under the control of the Houthi militia. The investigation should examine the administrative and legislative decisions documented in the annex to this study, and its findings should be incorporated into the next annual report submitted to the United Nations Security Council.

Issuance of Immediate Listing Decisions under the Sanctions Regime: Approve the listing of the eight individuals and four entities identified in this memorandum on the United Nations Security Council's Consolidated Sanctions List, subject to asset freezes and travel bans, as a decisive international deterrent message to the administrative, judicial, and financial architects of policies of starvation and plunder.

Tracing Looted Assets in Coordination with Member States: Issue formal notifications to United Nations Member States, regional and international financial intelligence units, and the Financial Action Task Force (FATF) to trace and freeze funds looted from Yemen's pension and social insurance funds, as well as proceeds from companies and real estate confiscated through the "Judicial Custodian" system, and prevent their illicit transfer or investment in foreign real estate and financial markets.

Review of UN Contracts to Prevent Funding Sanctioned Entities: Recommend that the United Nations Secretariat and the Office for the Coordination of Humanitarian Affairs (OCHA) require all UN agencies operating in Yemen to screen their contractors, suppliers, transport companies, money exchange firms, and local partner organizations against relevant sanctions lists, and ensure that no humanitarian or operational funds are transferred to entities and companies affiliated with Houthi leaders who are already listed or proposed for listing under the sanctions regime.

In conclusion, the American Center for Justice (ACJ) reiterates its absolute confidence and firm conviction in the high standards of humanitarian commitment and professionalism demonstrated by the esteemed Sanctions Committee and the Panel of Experts in securing justice for victims and upholding the rule of international law. The Center expresses its profound appreciation for your tireless efforts and courageous perseverance in dismantling networks of impunity and pursuing those responsible for grave crimes against the Yemeni people.

The Center also reaffirms its deep appreciation for this human rights engagement and expresses its keen interest in, and continued openness and readiness for, all forms of joint cooperation and constructive consultation in support of justice, the protection of civilians' rights, and the preservation of their human dignity. It further emphasizes that neither bloodshed nor the plunder of livelihoods can be consigned to oblivion through the passage of time, and that the realization of justice remains the ultimate goal that sustains our resolve and that of justice defenders around the world.

American Center for Justice (ACJ)

Michigan, United States of America

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