

Tactical AML/CFT Lawfare: The Administrative Pipeline, Statutory Suspension, and Private Compliance Interlocks Weaponized Against Non-Profit Dissent

The Coordinated Landscape of Financial Lawfare

The modern security state is increasingly characterized by the outsourcing of economic coercion to a highly structured ecosystem of network-aligned private legal groups, foreign intelligence partners, risk intelligence databases, and federal enforcement agencies. This dynamic—commonly termed financial lawfare—functions by deploying anti-money laundering (AML) and counter-terrorism financing (CFT) regulations to disrupt, de-platform, and financially isolate domestic non-profit organizations, anti-war advocates, and civil liberties groups. Rather than relying on traditional, slow-moving criminal prosecutions that require high standards of judicial proof, these network-aligned groups leverage administrative petitions and private compliance frameworks to trigger automated financial exclusions.

A primary operational node in this space is Shurat HaDin (the Israel Law Center), founded in 2003 by attorney Nitsana Darshan-Leitner. Explicitly modeled on the civil litigation strategies utilized by the Southern Poverty Law Center to bankrupt white supremacist organizations, Shurat HaDin works as an auxiliary legal arm to target state adversaries. According to leaked diplomatic cables, Darshan-Leitner acknowledged that in its formative years, the organization took direct guidance from the Government of Israel on which cases to pursue, receiving vital evidentiary material and dossiers from government officials. Specifically, the legal office of the Israeli National Security Council (NSC) and the Mossad's specialized financial-intelligence division, "Harpoon," viewed Shurat HaDin and the use of foreign civil courts as strategic channels to execute operations that state intelligence agencies were legally, diplomatically, or politically restricted from executing directly.

Operating with a budget of approximately \$2.5 million, Shurat HaDin's global operations are heavily subsidized by private U.S. foundations and philanthropic organizations, drawing significant funding from Christian Zionist and right-wing Jewish organizations, including John Hagee Ministries, the Jewish Federation of Greater Houston, and the Michael and Andrea Leven Family Foundation. By utilizing this funding to initiate aggressive civil litigation and administrative complaints, these organizations exploit the private sector's acute aversion to regulatory and reputational risk, forcing clearing banks, payment gateways, and non-profit boards to unilaterally cut ties with targeted groups rather than endure prolonged legal battles.

The Administrative Petition Pipeline and Foreign Intelligence Conduits

The operational path of financial lawfare relies on a highly coordinated administrative pipeline that funnels unverified foreign intelligence, strategic media leaks, and structured legal petitions directly into federal regulatory agencies. On March 1, 2026, a major consolidation occurred within this lawfare sector when the National Jewish Advocacy Center (NJAC), led by CEO Mark Goldfeder, acquired the Zachor Legal Institute. This merger formally integrated NJAC's aggressive litigation capacity with Zachor's policy research engine and strategic legal advisor Marc Greendorfer, creating a unified legal apparatus optimized for administrative advocacy and regulatory lobbying.

Prior to the merger, the Zachor Legal Institute established a standardized pipeline for submitting exhaustive compliance dossiers to the Department of Justice, the Internal Revenue Service, and the Department of the Treasury. These formal petitions targeted an array of domestic civil liberties, anti-war, and humanitarian networks under the guise of counter-terrorism compliance. Zachor's formal administrative petition pipeline has targeted several high-profile domestic entities:

- **American Muslims for Palestine (AMP):** Submissions to the Senate Committee on Health, Education, Labor, and Pensions (HELP) demanding federal investigations into alleged material support ties.
- **Wikimedia Foundation:** IRS complaints alleging that trustees utilized pseudonyms to violate federal non-profit disclosure laws.
- **Venable LLP:** Formal requests to the Department of Justice demanding Foreign Agents Registration Act (FARA) investigations into the firm's handling of Qatar-linked materials.
- **Students for Justice in Palestine (SJP):** Coordinated demands to the Department of Justice to prosecute student chapters and campus groups under reconstruction-era Ku Klux Klan (KKK) laws at Columbia University, MIT, and other major academic institutions.
- **Black Lives Matter (BLM):** Petitions to the Department of Justice alleging financial interlocks between domestic racial justice organizations and designated foreign terror affiliates.
- **Salsa Labs & ActBlue:** Strategic complaints sent directly to major digital fundraising and donor-management platforms, alleging that processing donations for Palestinian solidarity networks violates anti-terror and civil rights laws.

This petition pipeline achieved its most significant regulatory outcome in June 2025, when the U.S. Department of the Treasury officially designated six prominent Middle Eastern and European non-profit organizations as Specially Designated Nationals (SDNs). In February 2025, Zachor led a coalition of 45 organizations that submitted an evidence-based petition to the newly appointed Treasury Secretary, Scott Bessent. This petition relied heavily on undisclosed security assessments and intelligence compiled by the Israeli Security Agency (Shin Bet), asserting that these non-profits operated as financial and logistical fronts for the Popular Front for the Liberation of Palestine (PFLP).

The designated groups included Addameer (Prisoner Support and Human Rights Association), Al-Haq, the Union of Palestinian Women's Committees (UPWC), the Union of Agricultural Work Committees (UAWC), the Bisan Center for Research and Development, and Defense for Children International – Palestine (DCI-P). Despite public rebukes from the United Nations and partner nations concerning the lack of credible, publicly discoverable evidence supporting the PFLP affiliation claims, OFAC integrated these entities into the SDN list.

By securing these designations, Zachor and its coalition partners successfully weaponized the "Whac-A-Mole" doctrine of financial enforcement. This argument posits that because terror-linked networks operate through fluid, overlapping civil society organizations, regulators must apply broad, categorical SDN designations across entire coalitions to prevent the rapid

migration of funds from designated nodes to their active, non-designated affiliates. Consequently, any domestic non-profit acting as a fiscal sponsor, donor platform, or transaction processor for these designated organizations is immediately exposed to severe civil and criminal liability under the Antiterrorism Act (ATA).

Structural Flow Model of the Administrative Process

The operational transmission belt of financial lawfare bridges the gap between private ideological advocacy and automated global financial exclusion. This pipeline proceeds through distinct, interconnected phases, as detailed in the following table:

Phase	Operational Arena	Actor	Mechanism / Action	Regulatory & Compliance Output
1	Intelligence Gathering	Foreign Intel (Shin Bet / Mossad) & Lawfare NGOs	Interception of transaction records; compilation of unclassified and classified security dossiers.	Raw intelligence portfolio and structured legal dossiers linking targets to PFLP or Hamas.
2	Media Mobilization	Allied Media (e.g., <i>Washington Examiner</i>) & Watchdogs	Coordinated publication of exposés and public relations campaigns targeting the entity's financial links.	Reputational damage; public and congressional pressure on fintech intermediaries and banks.
3	Administrative Filing	Lawfare Orgs (Zachor/NJAC Coalition)	Formal submission of petitions, FARA complaints, and IRS Form 13909 referrals to OFAC, FinCEN, and DOJ.	Official administrative record open at federal agencies; preliminary regulatory reviews triggered.
4	Federal Designation	Department of the Treasury (OFAC)	Listing of the targeted organization and its key personnel on the SDN List under Executive Order 13224.	Global asset freeze; immediate suspension of U.S. transaction clearing privileges.
5	Database Ingestion	Risk Intelligence Providers (World-Check, LexisNexis, RDC)	Automated extraction of OFAC listings and media allegations; algorithmic profile	Insertion of high-risk AML/CFT flags and PEP/terror-match profiles into

Phase	Operational Arena	Actor	Mechanism / Action	Regulatory & Compliance Output
			updates.	screening software.
6	Algorithmic Screening	Clearing Banks (JPMorgan Chase, Citibank)	Automated real-time matching of customer names and transactions against third-party database updates.	Generation of positive-match alerts; internal compliance review and transaction holds.
7	Financial Exclusion	Payment Processors & Clearing Banks	Account termination under the bank's non-negotiable risk-appetite and terms of service policies.	Complete financial de-platforming; total loss of merchant processing and depository capacity.

Section 501(p) Suspension Mechanics and Statutory Gaps

When a domestic organization is designated under federal counter-terrorism authorities, the Internal Revenue Code is deployed as an automated financial mechanism to dismantle its legal and philanthropic infrastructure. Enacted under the Military Family Tax Relief Act of 2003, IRC Section 501(p) mandates the immediate and automatic suspension of the tax-exempt status of any organization designated or identified by the federal government as a terrorist entity.

The primary tactical advantage of Section 501(p) within the framework of financial lawfare is its complete bypass of the traditional administrative and judicial due process protections guaranteed to standard corporate and non-profit entities. Under standard IRS procedures, the revocation of an organization's tax-exempt status is a highly regulated, adversarial process. It requires an intensive, multi-year IRS examination, provides the organization with the right to appeal proposed adverse findings to the IRS Independent Office of Appeals, and permits the entity to file a declaratory judgment action under IRC Section 7428 in federal court to maintain its status during the dispute.

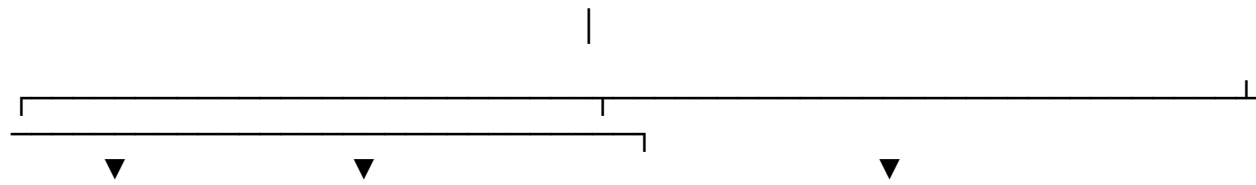
Under Section 501(p), however, this entire protective framework is suspended. The moment OFAC lists an organization as an SDN, or the State Department designates it as a Foreign Terrorist Organization (FTO) or places it on the Terrorist Exclusion List (TEL), the tax-exempt status of that organization is instantaneously suspended without prior notice, administrative hearings, or judicial asset discovery. The administrative consequences of a 501(p) designation are severe, permanent, and designed to induce immediate corporate collapse :

Traditional Revocation Process (Lengthy Adversarial Rights):

—> [Independent Office of Appeals] —> —>

Section 501(p) Fast-Track Suspension (Immediate Coercive Impact):

—(Instant Automator)—>



[Immediate Loss of Grant Eligibility]

Once suspended under Section 501(p), the organization is immediately stripped of its 501(a) tax exemption, transforming it into a standard, fully taxable corporate entity. It is required to file standard corporate income tax returns and faces immediate liability for federal income taxes. Concurrently, pursuant to Section 501(p)(4), the organization's eligibility to receive tax-deductible contributions under Sections 170, 2055, 2106, and 2522 is suspended. This instantly halts all donor-advised fund (DAF) transfers, private foundation grants, and individual tax-deductible contributions, neutralizing the organization's fundraising capacity. Furthermore, the impact of a Section 501(p) suspension propagates to the state level through automatic statutory links. In New York, for example, Tax Law Section 27 and Publication 845 dictate that state-level tax-exempt status is automatically revoked upon the publication of an IRS notice under Section 501(p). The affected organization must immediately surrender its sales and use tax Exempt Organization Certificate.

It becomes subject to all state and local taxes, including the corporate franchise tax, real estate transfer tax, mortgage recording tax, and excise taxes. Crucially, New York's corporate franchise tax revocation applies retroactively to the entire taxable year in which the suspension occurs, imposing massive, retroactive corporate tax liabilities on the organization's historical revenues. A profound legal paradox also emerges at the intersection of IRS dissolution regulations and OFAC sanctions regimes. Treasury Regulation Section 1.501(c)(3)-1(b)(4) mandates that to qualify for 501(c)(3) status, an organization's articles of incorporation must permanently dedicate its assets to exempt purposes. Upon dissolution, those assets must, by operation of law or charter, be distributed to another qualified 501(c)(3) entity.

However, under the International Emergency Economic Powers Act (IEEPA) and Executive Order 13224, any transaction, transfer, or distribution of property belonging to a designated global terrorist entity is strictly prohibited and subject to severe criminal penalties. This creates a structural conflict: the organization's tax charter legally obligates it to distribute its assets to other non-profits upon corporate winding-down, yet the federal sanctions regime makes any such distribution a criminal act. The resulting legal gridlock ensures complete corporate paralysis, allowing the government to indefinitely freeze the assets of the organization without ever having to prove criminal intent in a court of law.

This administrative model has driven legislative efforts to expand these fast-track suspension powers to domestic political actors. During recent legislative sessions, a bipartisan coalition introduced H.R. 6408, S. 4136, and H.R. 9495, which sought to amend the Internal Revenue Code to grant the Secretary of the Treasury unilateral authority to designate any domestic U.S. non-profit as a "terrorist-supporting organization".

Under these proposed frameworks, the Treasury Secretary would not have to wait for an official OFAC SDN designation or an FTO listing. Instead, the Secretary could issue a notice of intent based on an internal administrative finding that the non-profit had provided "material support or resources" to a designated group within the preceding three years.

The targeted organization would be given 90 days to appeal the finding directly to the IRS, but would be denied any pre-designation judicial discovery or court-supervised evidentiary hearings. The enactment of such legislation would effectively codify a domestic executive mechanism to

dismantle civil society organizations and labor unions under the highly elastic and politicized definitions of "material support".

Banking Sector De-risking Coordinates and Third-Party Compliance Integration

Beyond direct state designations, the primary mechanism of financial lawfare is executed through private banking sector "de-risking". De-risking occurs when global financial institutions—fearful of multi-billion dollar regulatory fines, criminal prosecutions, and reputational crises—indiscriminately close the accounts of entire categories of clients perceived as high-risk, rather than analyzing and managing the specific risks of those clients in a targeted manner. This systemic risk avoidance is heavily driven by third-party risk intelligence providers, primarily Refinitiv's World-Check, LexisNexis, and Regulatory DataCorp (RDC). These firms compile massive global databases of "Politically Exposed Persons" (PEPs), sanctioned individuals, and "high-risk" organizations. They routinely ingest white-label compliance risk briefs generated by ideological watchdog groups like NGO Monitor and the Foundation for Defense of Democracies (FDD).

Because these compliance aggregators prioritize minimizing regulatory omissions, they frequently incorporate unproven allegations, foreign administrative designations, and politically motivated media reports directly into their databases as confirmed risk indicators. Major clearing banks, such as JPMorgan Chase, Citibank, and Wells Fargo, license these databases to run automated, real-time transaction and account-screening algorithms.

This outsourced compliance model has generated substantial legal vulnerabilities under the Fair Credit Reporting Act (FCRA). Class-action litigation has targeted RDC and LexisNexis for utilizing highly inaccurate, automated "fuzzy matching" algorithms that generate false-positive links between innocent domestic political actors and global criminals or terrorist financiers based solely on name similarities.

Compounding this violation of the FCRA—which mandates that consumer reporting agencies follow reasonable procedures to ensure maximum possible accuracy—RDC and LexisNexis contractually impose strict non-disclosure restrictions on their banking clients. These clauses prohibit banks from revealing to their customers the source of the risk profile or even the fact that a third-party report was generated, effectively preventing targeted organizations from correcting false information and contesting their financial exclusion.

The real-world execution of this outsourced compliance loop is illustrated by the systematic campaign against the Alliance for Global Justice (AfGJ), a Tucson-based progressive non-profit. AfGJ acted as a critical fiscal sponsor for over 140 progressive and human rights projects, including Collectif Palestine Vaincra, an affiliate of the Samidoun Palestinian Prisoner Solidarity Network. In January 2022, the Zachor Legal Institute initiated a coordinated legal and media offensive, sending formal demand letters to Salsa Labs, the provider of AfGJ's donor-management and fundraising software.

Zachor's letters asserted that by processing credit card donations for Samidoun via AfGJ, Salsa Labs was exposing itself to severe civil and criminal liability under the Anti-Terrorism Act for facilitating material support to the PFLP. Under this threat of catastrophic secondary liability, Salsa Labs' back-end transaction processor, CardConnect, unilaterally terminated its payment-clearing contract for the AfGJ account in February 2023. This action instantly shut down the online fundraising capacity of AfGJ and all of its 140 sponsored humanitarian and civil rights projects.

When AfGJ attempted to mitigate this exclusion by migrating its transaction portal to Stripe, Zachor and a global coalition of 11 pro-Israel organizations escalated the pressure. They sent a joint formal warning to Stripe's executive leadership and successfully petitioned congressional allies—including Reps. Elise Stefanik and Mike Lawler—to publicly threaten federal investigation of the payment processor.

This coordinated pressure was reinforced by a payment-network-wide blockade, as PayPal, Discover, Visa, Mastercard, American Express, Donorbox, and Plaid systematically terminated processing services for any portals linked to Samidoun or AfGJ. Because these fintech companies are private entities, their actions did not trigger First Amendment protections, leaving the targeted organizations with no viable mechanism to restore their financial access.

Personnel Interlocks and Institutional Transitions

The systemic precision and operational effectiveness of financial lawfare are substantially reinforced by a highly professionalized revolving door between federal enforcement agencies and private lawfare networks. Former senior directors, policy architects, and legal counsels from the Treasury Department's Office of Foreign Assets Control (OFAC), the Financial Crimes Enforcement Network (FinCEN), and the Office of Terrorism and Financial Intelligence (TFI) frequently transition into leadership and advisory roles within ideologically aligned think tanks and private compliance firms. This career pipeline imports specialized government methodology, internal regulatory insights, and personal networks directly into private lawfare campaigns, as detailed in the following table:

Executive Officer	Former Federal Enforcement Role	Lawfare / Think Tank Alignment	Private / Commercial Compliance Role	Strategic Impact & Policy Output
Juan C. Zarate	First-ever Assistant Secretary of the Treasury for Terrorist Financing and Financial Crimes; Deputy National Security Advisor.	Foundation for Defense of Democracies (FDD) - Chairman & Co-Founder of the Center on Economic and Financial Power (CEFP).	Global Co-Managing Partner, K2 Integrity; Chair, Consilient (Fintech AML/CFT AI); Advisor, Coinbase.	Authored <i>Treasury's War</i> ; pioneered the strategic weaponization of Treasury's economic powers; integrates public-sector CFT methods with commercial blockchain compliance.
Sigal Mandelker	Under Secretary of the Treasury for Terrorism and Financial Intelligence (TFI) (overseeing OFAC, FinCEN, OIA, and TFFC).	Co-Chair, CNAS Task Force on FinTech, Crypto, and National Security.	General Partner, Ribbit Capital; Board Member, Crypto Council for Innovation; Advisor, Chainalysis.	Designed targeted financial pressure campaigns; directs venture capital towards blockchain forensics and transaction monitoring tools

Executive Officer	Former Federal Enforcement Role	Lawfare / Think Tank Alignment	Private / Commercial Compliance Role	Strategic Impact & Policy Output
				used to flag non-profit payment flows.
Marshall Billingslea	Assistant Secretary of the Treasury for Terrorist Financing; President of the Financial Action Task Force (FATF).	Hudson Institute (Senior Fellow) ; Collaborator, FDD Center on Military and Political Power (CMPP).	Managing Director, Deloitte Business Intelligence Services (historical).	Coordinated global FATF standards on non-profit vulnerability (Recommendation 8); drafts policy papers promoting aggressive enforcement of anti-terror financing regimes.
Chip Poncy	Inaugural Director of the Office of Strategic Policy for Terrorist Financing and Financial Crimes (OSP), Treasury.	FDD Center on Economic and Financial Power (CEFP) - Senior Advisor.	President and Co-Founder, Financial Integrity Network (FIN); Financial crimes compliance advisor to HSBC.	Co-chaired FATF policy working groups; advises global clearing banks on implementing CFT screening systems that trigger algorithmic de-risking.
Nova Daly	Deputy Assistant Secretary for Investment Security and Policy, Treasury; Director for International Trade, NSC.	FDD Center on Economic and Financial Power (CEFP) - Board of Advisors.	Senior International Trade and Sanctions Attorney.	Advises private corporate clients and think tanks on CFIUS, cyber-security policy, and the commercial application of economic sanctions.
Adnan Kifayat	Senior Advisor to the Under Secretary of State; Senior Treasury Department Representative.	FDD Center on Economic and Financial Power (CEFP) - Board of Advisors.	Head of Global Security Ventures, Gen Next Foundation; Senior Fellow, German Marshall Fund.	Directs private-sector venture funding and public diplomacy programs to align global banking systems with U.S. financial security objectives.

Executive Officer	Former Federal Enforcement Role	Lawfare / Think Tank Alignment	Private / Commercial Compliance Role	Strategic Impact & Policy Output
Mark Goldfeder	Presidential Appointee, United States Holocaust Memorial Museum Council.	National Jewish Advocacy Center (NJAC) - CEO and Director.	Co-Founder, Gideon Law Group; Special Counsel, American Center for Law and Justice (ACLJ).	Spearheads strategic impact litigation; drafts "challenge-proof" state-level laws aligning First Amendment exceptions with anti-BDS enforcement.
Marc Greendorfer	Elite corporate transactional attorney, AmLaw 100 firms.	National Jewish Advocacy Center (NJAC) - Strategic Legal Advisor; Co-Founder, Zachor Legal Institute.	Principal, Gideon Law Group.	Developed the core constitutional and commercial defense strategies for state-level anti-BDS laws; coordinates Zachor's administrative petitions to OFAC and IRS.

This concentration of enforcement expertise within private and ideological organizations transforms think tanks from standard research institutes into sophisticated operational hubs. By utilizing former Treasury officials who understand the exact evidentiary requirements needed to trigger an OFAC investigation or an IRS audit, organizations like FDD and NJAC can draft their administrative petitions to match the internal processing parameters of federal agencies. This high-level interlock ensures that private petitions are rapidly integrated into formal regulatory pipelines, bypassing traditional administrative hurdles.

Strategic Conclusions and Policy Alternatives

The systematic coordination between private lawfare organizations, risk intelligence providers, and federal enforcement agencies has established a parallel, privatized regulatory regime that operates with minimal democratic oversight or judicial accountability. This infrastructure leverages the compliance machinery of the global banking system to execute extrajudicial financial bans against domestic political dissenters. By weaponizing the threat of secondary civil and criminal liability under the Anti-Terrorism Act, lawfare groups compel financial intermediaries to execute unilateral account closures. This effectively isolates targeted organizations from the modern economy without requiring the government to meet standard constitutional or judicial burdens of proof.

Furthermore, as documented by the Treasury Department's own comprehensive assessments of the financial system, indiscriminate de-risking does not enhance national security. Instead, it drives legitimate non-profit organizations, humanitarian operations, and diaspora remittance flows out of the highly regulated, transparent banking system and into informal, cash-based, or

offshore financial networks. This migration severely undermines the analytical capacity of FinCEN and law enforcement, obscuring transaction trails and inadvertently increasing the system's vulnerability to illicit finance and actual terrorist exploitation.

To restore constitutional due process, mitigate the destabilizing impact of de-risking, and preserve the integrity of the domestic non-profit sector, several regulatory reforms are necessary:

- **Codify Pre-Suspension Judicial Checks for Section 501(p):** Congress must amend the Internal Revenue Code to mandate that any proposed suspension of tax-exempt status under Section 501(p)—or any future "terrorist-supporting organization" designation—be reviewed and approved by a federal district court before taking effect. The Department of the Treasury must be required to present clear and convincing evidence of intentional support for terrorism, with the target organization granted full access to the administrative record, the right to cross-examine witnesses, and the ability to maintain its exempt status and receive tax-deductible donations under a court-supervised escrow system during the pendency of any appeal.
- **Establish Federal Safe Harbors for Non-Profit Banking:** The Department of the Treasury, in consultation with FinCEN and federal functional banking regulators (the FDIC, OCC, and Federal Reserve), must issue formal, legally binding guidance establishing a clear regulatory "safe harbor" for financial institutions serving registered domestic 501(c)(3) organizations. This safe harbor must protect banks from civil or criminal "material support" liability under the Anti-Terrorism Act for providing standard depository, clearing, and payment services to domestic non-profits, provided the bank conducts standard, risk-based due diligence and the target organization is not subject to a formal, active SDN listing.
- **Enforce FCRA Compliance on Risk Intelligence Databases:** The Consumer Financial Protection Bureau (CFPB) must issue strict regulatory guidance classifying proprietary risk databases (such as Refinitiv's World-Check, LexisNexis, and RDC) as "consumer reporting agencies" subject to the full enforcement of the Fair Credit Reporting Act (FCRA). This classification must legally prohibit these companies from incorporating unverified internet rumors, foreign state-media designations, or private watchdog dossiers into their compliance profiles without independent, public verification.
- **Abolish Contractual Gag Orders in Banking Compliance:** Regulatory agencies must prohibit risk database providers from contractually restricting financial institutions from disclosing the contents of compliance reports to affected customers. Under the FCRA, banks must be legally mandated to provide any de-risked or terminated non-profit with a copy of the risk report used to make the adverse decision, alongside a clear, 90-day administrative window to challenge, correct, and resolve any false-positive matches or inaccurate allegations before account termination occurs.
- **Strengthen Post-Employment Ethics and Cooling-Off Periods:** Ethics laws governing federal enforcement personnel must be amended to impose a mandatory five-year cooling-off period before former senior officials from the Treasury Department (specifically OFAC, FinCEN, and TFI), the Department of Justice, and the National Security Council can accept compensated board, advisory, or consulting positions with private lawfare organizations, ideologically driven think tanks, or commercial compliance firms. This restriction is essential to disrupt the privatization of specialized government tools and prevent the weaponization of state enforcement mechanisms against domestic civil society.

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