



FinCEN

ALERT

FIN-2024-Alert001

This document has been rescinded.

February 1, 2024

FinCEN Alert on Israeli Extremist Settler Violence Against Palestinians in the West Bank

Suspicious Activity Report (SAR) Filing Request:

FinCEN requests that financial institutions reference this alert in SAR field 2 (Filing Institution Note to FinCEN) and the narrative by including the key term “FIN-2024-WBEXTREMISM”.

The Financial Crimes Enforcement Network (FinCEN) is issuing this alert to financial institutions¹ related to the financing of Israeli extremist settler violence against Palestinians in the West Bank. This alert provides select red flags to assist financial institutions in identifying and reporting suspicious activity that finances such violence.

The United States has consistently opposed actions that undermine peace, security, or stability in the West Bank, including attacks by Israeli violent extremist settlers against

Palestinians, attacks by Palestinian violent extremists against Israelis, and other acts that unduly restrict civilians’ access to essential services and basic necessities and risk further escalating tensions and expanding the conflict in the region.² As the U.S. Department of State (State) noted, the U.S. Government “will continue to seek accountability and justice for all acts of violence against civilians in the West Bank, regardless of the perpetrator or the victim.”³

Treasury’s Office of Foreign Assets Control (OFAC) additionally is highlighting for members of the public that the President, on February 1, 2024, issued an Executive Order (E.O.) that authorizes the U.S. government to impose sanctions on foreign persons that are responsible for or complicit in, or have directly or indirectly engaged or attempted to engage in (1) actions that threaten the peace, security, or stability of the West Bank; or (2) planning, ordering, otherwise directing, or participating in specified actions affecting the West Bank, such as violence targeting civilians and property destruction.⁴ The United States seeks to impose tangible and significant consequences on those engaged in such activities, as well as to protect the U.S. financial system from abuse.

1. See 31 U.S.C. § 5312(a)(2); 31 CFR § 1010.100(t).





2. See State, [“Announcement of Visa Restriction Policy to Promote Peace, Security, and Stability in the West Bank - United States Department of State”](#) (Dec. 5, 2023) (“State Visa Restriction Policy Announcement”); White House, [“Readout of President Biden’s Call with Prime Minister Netanyahu of Israel”](#) (Nov. 6, 2023); White House, [“Readout of the Vice President’s Call with President Isaac Herzog of Israel”](#) (Dec. 3, 2023), and State, [“Secretary Blinken’s Call with Israeli Minister Gantz”](#) (Nov. 16, 2023); State Department Press Briefings, [October 30, 2023](#) and [November 1, 2023](#). For statistics related to ongoing violence and casualties in the West Bank, see United Nations Office for the Coordination of Humanitarian Affairs, [“Hostilities in the Gaza Strip and Israel – News and Updates”](#).

3. See State Visa Restriction Policy Announcement, *supra* footnote 2.

4. See Executive Order of February 1, 2024, “Imposing Certain Sanctions on Persons Undermining Peace, Security, and Stability in the West Bank” on [WhiteHouse.gov](#).

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FinCEN has identified the following red flag indicators to help detect, prevent, and report potential suspicious activity related to the financing of Israeli extremist settler violence against Palestinians in the West Bank. As no single red flag is necessarily indicative of illicit or suspicious activity, financial institutions should consider all the surrounding facts and circumstances before determining whether a specific transaction is suspicious or associated with potential Israeli extremist settler violence:

-  1 Payments to any organizations or groups, including nonprofit organizations (NPO),⁵ that are now or have been previously linked to violent extremist groups in the West Bank or lists an officer, founder, or director that is currently or has been previously linked to Israeli violent extremist groups in the West Bank.
-  2 Information included in a transaction between customers, such as references in the memo field, that indicate support for Israeli violent extremist groups or campaigns.
-  3 Transactions with no apparent economic, business, or lawful purpose associated with a rapid movement of funds and linked to NPOs active in supporting violent extremist Israeli settlers in the West Bank, particularly if the NPO has advocated for, or solicited donations on social media in support of, Israeli violent extremist groups or campaigns.
-  4 Purchases of tactical military gear for resale overseas and destined for non-government Israeli end-users in the West Bank, particularly if the end-users are currently or have been previously linked to Israeli violent extremist groups in the West Bank.

FinCEN requests that financial institutions reference this alert by including the key term “FIN-2024-WBEXTREMISM” in SAR field 2 (Filing Institutions Note to FinCEN) and the narrative to indicate a connection between the suspicious activity being reported and this alert.

The mission of the Financial Crimes Enforcement Network is to safeguard the financial system from illicit use, combat money laundering and its related crimes including terrorism, and promote national security through the strategic use of financial authorities and the collection, analysis, and dissemination of financial intelligence.

The information contained in this alert is derived from FinCEN’s analysis of Bank Secrecy Act data, open-source reporting, and information provided by law enforcement partners.

Questions or comments regarding the contents of this alert should be sent to frc@fincen.gov.

5. FinCEN continues to emphasize that legitimate charities should have access to financial services and can transmit funds through legitimate and transparent channels. As set out in the Joint Fact Sheet on BSA Due Diligence Requirements for Charities and Non-Profit Organizations, banks are reminded to apply a risk-based approach to CDD requirements when developing the risk profiles of charities and other non-profit customers. The application of a risk-based approach is consistent with existing CDD and other Bank Secrecy Act/AML compliance requirements. FinCEN, Board of Governors of the Federal Reserve System, Federal Deposit Insurance Corporation, National Credit Union Administration, and Office of the Comptroller of the Currency, [“Joint Fact Sheet on Bank Secrecy Act Due Diligence Requirements for Charities and Non-Profit Organizations”](#) (Nov. 19, 2020).