

APPENDIX A

BIBLIOGRAPHY

Books

- Eckert, Sue E. “The U.S. Regulatory Approach to Terrorist Financing” in *Countering the Financing of Terrorism*, Thomas J. Biersteker and Sue E. Eckert, ed., 2008.
- Zarate, Juan. “Treasury’s War: The Unleashing of a New Era of Financial Warfare.” New York: Public Affairs, 2013.

Letters

- American Bankers Association. “Frank Keating Letter to Hillary Clinton.” American Bankers Association, January 18, 2011. <https://www.aba.com/aba/documents/news/ClintonGeithnerLetter11811.pdf>.
- Charity & Security Network. “Letter to Jacob Lew, Treasury Secretary, and John Kerry, Secretary of State.” Charity & Security Network, February 25, 2016. http://www.charityandsecurity.org/system/files/Sign%20on%20Ltr%20Fin%20Access_1.pdf
- Charity & Security Network. “Letter to Jennifer Fowler, Deputy Assistant Secretary, U.S. Department of Treasury, and Andrew Keller, Deputy Assistant Secretary, U.S. Department of State.” Charity & Security Network, July 21, 2016. <http://www.charityandsecurity.org/system/files/CSN%20Response%20to%20StTreasLtr%20%281%29%20July%202021.pdf>.
- Charity & Security Network. “Letter to Kay Guinane, Charity & Security Network, from Jennifer Fowler, Deputy Assistant Secretary, Department of Treasury, and Andrew Keller, Deputy Assistant Secretary, Department of State.” Charity & Security Network, May 13, 2016. <http://www.charityandsecurity.org/system/files/Joint%20Response%20letter%20to%20NPO%20on%20reduced%20access%20to%20financial%20services%20May%202016%20signed.pdf>.
- The Clearing House. “Comments in Response to Consultative Report–Correspondent Banking.” Letter to Robert Lindley, CPMI Secretariat, from The Clearing House, December 7, 2015. <https://www.theclearinghouse.org/-/media/action%20line/documents/volume%20vi/20151207%20tch%20bis%20correspondent%20banking%20comment%20letter.pdf>.

Periodicals

- Alzoubi, Zedoun. “Syrian Medical NGOs in the Crisis: Realities, Perspectives, and Challenges.” Norwegian Peacebuilding Resource Center, October 1, 2015. <http://noref.no/Regions/Middle-East-and-North-Africa/Syria/Publications/Syrian-medical-NGOs-in-the-crisis-realities-perspectives-and-challenges>.
- Arnold, Martin. “Financial task force warns on banks’ approach to de-risking.” *Financial Times*, November 13, 2014. <https://www.ft.com/content/087afe70-66bc-11e4-91ab-00144feabdc0>.
- Barry, Rob and Ensign, Rachel Louise. “Losing Count: U.S. Terror Rules Drive Money Underground.” *Wall Street Journal*, March 30, 2016. <http://www.wsj.com/articles/losing-count-u-s-terror-rules-drive-money-underground-1459349211>.
- BBC News. “Somalia fears as U.S. Sunrise banks stop money transfers.” *BBC News*, December 30, 2011. <http://www.bbc.com/news/world-africa-16365619>.
- Bill Isaac, former chairman of the FDIC, (November 5, 2015), comment post in response to Andrea Hall, “Bank De-Risking Hurts Charities and Increases Risk of Laundering.” *American Banker*, November 5, 2015. <https://www.americanbanker.com/opinion/bank-de-risking-hurts-charities-and-increases-risk-of-laundering>.

- Bresnick, Michael J. “How Regulators Can Fight De-Risking.” American Banker, April 7, 2016. <http://www.americanbanker.com/bankthink/how-regulators-can-fight-de-risking-1080297-1.html>.
- British Bankers Association. “British Bankers Association Roundtable on Financial Exclusion/Stability arising from financial crime related de-risking.” British Bankers Association, March 17, 2014. <http://www.caribbeanderisking.com/sites/default/files/BBA%20Report%20Roundtable%20on%20Derisking%20March%202014.pdf>.
- British Bankers Association et al. “De-risking: Global Impact and Unintended Consequences for Exclusion and Stability, Balancing public policy objectives.” Prepared for use by the October 2014 FATF Plenary and associated working groups, October 2014. https://classic.regonline.com/custImages/340000/341739/G24%20AFI/G24_2015/De-risking_Report.pdf.
- Clozel, Lalita. “Lew on De-Risking: Banks Should Not Be Penalized for Engaging Abroad.” American Banker, October 2016. <http://www.americanbanker.com/news/law-regulation/lew-on-de-risking-banks-should-not-be-penalized-for-engaging-abroad-1091838-1.html>.
- Compliance Monitor. “Do FCA de-risking warnings raise more questions than they answer?” Compliance Monitor, September 2016. <https://www.mayerbrown.com/files/News/648f0425-987e-415d-9f18-6ee32d2afcbc/Presentation/NewsAttachment/689316ff-3299-4a1c-b76a-70b9590e9a67/160907-Compliance-Monitor-FCA-article.PDF>.
- Eastwood, Sam and Pegram, Ian Michael. “The Risks of De-Risking: Conflicting Pressures on Financial Institutions.” Norton Rose Fulbright, May 2015. <http://www.nortonrosefulbright.com/knowledge/publications/129032/the-risks-of-de-risking-conflicting-pressures-on-financial-institutions>.
- Ellis, Clare and de Oliveira, Inês Sofia. “Tackling Money Laundering: Towards a New Model for Information Sharing.” RUSI, September 2015. https://rusi.org/sites/default/files/201509_op_tackling_money_laundering.pdf.
- Epstein, Matthew and Mendelsohn, Howard. “Here’s How to Solve the De-Risking Riddle.” American Banker, May 3, 2016. <http://www.americanbanker.com/bankthink/heres-how-to-solve-the-de-risking-riddle-1080805-1.html>.
- Financial Stability Board. “FSB publishes progress report to G20 on action plan to assess and address the decline in correspondent banking.” Financial Stability Board, August 25, 2016. <http://www.fsb.org/2016/08/fsb-publishes-progress-report-to-g20-on-actions-to-address-correspondent-banking-declines/>.
- Finch, Gavin and Robinson, Edward. “Why Banks Like HSBC Won’t Send Money to War-Zone Charities.” Bloomberg, May 11, 2016. <https://www.bloomberg.com/news/articles/2016-05-11/banks-cutting-money-flow-for-charities-squeezes-relief-in-syria>.
- Giving U.S.A. “New Giving Record Is More Than a Number.” Giving U.S.A., June 14, 2016. <https://trust.guidestar.org/new-giving-record-is-more-than-a-number>.
- Guinane, Kay and Evans, Cherie L. “Gap Between Tax and Sanctions Law Blocks Lifesaving Aid.” Tax Notes, October 10, 2016. <http://www.taxnotes.com/exempt-organizations/charitable-giving/gap-between-tax-and-sanctions-law-blocks-lifesaving-aid/2016/10/27/18648101>.
- Hall, David L. and Nettleton, Matthew P. “Derisking: FinCEN Has Your Cake and Eats it Too.” Wiggin and Dana LLP. http://apps.americanbar.org/bU.S.law/committees/CL310000pub/newsletter/201502/fa_3.pdf.
- Heller, Robert. “The Time Has (Finally) Come for a Single Regulator.” American Banker, December 7, 2016. <https://www.americanbanker.com/opinion/the-time-has-finally-come-for-a-single-regulator>.
- Humanitarian Outcomes and Interaction. “NGOs and Risk: How international humanitarian actors manage uncertainty.” Humanitarian Outcomes and Interaction, February 2016. https://www.humanitarianoutcomes.org/sites/default/files/ngo-risk_report.pdf.
- Keatinge, Tom. “A War of Proportion: Regulating the Financial Sector in the Name of Counterterrorism.” Charity & Security Network, September 18, 2013. http://www.charityandsecurity.org/blog/War_Of_Proportion_Financial_Sector_Counterterrorism.
- Keatinge, Tom. “Breaking the Banks: The Financial Consequences of Counterterrorism.” Foreign Affairs, June 26, 2014. <https://www.foreignaffairs.com/articles/united-states/2014-06-26/breaking-banks>.
- Kentouris, Chris. “KYC Utilities: How Many Is Too Many?” FinOps Report, April 16, 2015. <http://finops.co/regulations/kyc-utilities-how-many-is-too-many/>.
- Khan, Faisal. “Can’t find MSB Friendly Banks? Go ahead, scream. No one is listening.” LinkedIn, July 6, 2015. <https://www.linkedin.com/pulse/cant-find-msb-friendly-banks-go-ahead-scream-one-listening-khan?forceNoSplash=true>.

- Lee, Paul and Pesce, Teresa. "Regulators Foster De-Risking More than They Admit." American Banker, February 10, 2016. <http://www.americanbanker.com/bankthink/regulators-foster-de-risking-more-than-they-admit-1079271-1.html>.
- Long, Paige. "Banks say take-up of KYC utilities needs to improve." Risk.net, December 11, 2015. <http://www.risk.net/operational-risk-and-regulation/news/2438944/banks-say-take-up-of-kyc-utilities-needs-to-improve>.
- Mayyasi, Alex. "Hawala: The Working Man's Bitcoin," Priceonomics, 7 February 2014. <https://priceonomics.com/hawala-the-working-mans-bitcoin/>.
- McKendry, Ian. "Banks Face No-Win Scenario on AML 'De-Risking'." American Banker, November 17, 2014. <http://www.americanbanker.com/news/law-regulation/banks-face-no-win-scenario-on-aml-de-risking-1071271-1.html>.
- McKendry, Ian. "Treasury to Banks: Derisking Is Your Problem to Solve." American Banker, November 13, 2015. <http://www.americanbanker.com/news/law-regulation/treasury-to-banks-de-risking-is-your-problem-to-solve-1077844-1.html>.
- Mendoza, Naki B. "How banks de-risking can undermine development." Devex Impact, May 31, 2016. <https://www.devex.com/news/how-banks-de-risking-can-undermine-development-88227>.
- Noonan, Laura. "Banks Face Pushback Over Surging Compliance and Regulatory Costs." Financial Times, May 28, 2015. <https://www.ft.com/content/e1323e18-0478-11e5-95ad-00144feabdc0>.
- Palazzolo, Joe and Rieker, Matthias. "Lenders Pressed on Embassy Banking." Wall Street Journal, 17 April 2012. <http://www.wsj.com/articles/SB10001424052702304818404577350171935104982>.
- Popper, Nathaniel. "Regulators and HSBC Faulted in Report on Money Laundering." New York Times Deal Book, July 16, 2012. http://dealbook.nytimes.com/2012/07/16/scathing-report-details-money-laundering-problems-at-hsbc/?_r=0.
- Proctor, Allen J. "Linking Mission to Money: A "Dual-Business" Model for Nonprofit Sustainability." Georgia Center for Nonprofits. <http://www.gcn.org/articles/Linking-Mission-to-Money-A-%E2%80%9CDual-Business%E2%80%9D-Model-for-Nonprofit-Sustainability>.
- Raymond, Nate. "BNP Paribas sentenced in \$8.9 billion accord over sanctions violations." Reuters, May 1, 2015. <http://www.reuters.com/article/U.S.-bnp-paribas-settlement-sentencing-idU.S.KBN0NM41K20150501>.
- Reuters. "Arab banks' ties to foreign banks under pressure, survey finds." Reuters, September 5, 2016. <http://www.reuters.com/article/us-mideast-banks-idUSKCN11B22R>.
- Rieker, Matthias, Palazzolo, Joseph and McGrane, Victoria. "Banks Exit From Embassy Business: Moves By Largest Lenders Could Strain Relations Between U.S. government and Other Countries." Wall Street Journal, November 20, 2010. <http://www.wsj.com/articles/SB10001424052748703531504575625060985983720>.
- Rogin, Josh. "37 Embassies in Washington Face Banking Crisis." Foreign Policy, November 19, 2010. <http://foreignpolicy.com/2010/11/19/37-embassies-in-washington-face-banking-crisis/>.
- Rutzen, Douglas. "Aid Barriers and the Rise of Philanthropic Protectionism." International Journal of Not-for-Profit Law, (vol. 17, no. 1), March 2015. <http://www.icnl.org/research/journal/vol17ss1/Rutzen.pdf>.
- Shabibi, Namir and Bryant, Ben. "VICE News Reveals the Terrorism Blacklist Secretly Wielding Power over the Lives of Millions." VICE News, February 4, 2016. <https://news.vice.com/article/vice-news-reveals-the-terrorism-blacklist-secretly-wielding-power-over-the-lives-of-millions>.
- Society for Worldwide Interbank Financial Telecommunication. "Addressing the unintended consequences of de-risking." SWIFT, July 5, 2016. <https://www.swift.com/insights/news/addressing-the-unintended-consequences-of-de-risking>.
- Society for Worldwide Interbank Financial Telecommunication. "SWIFT addresses the Know Your Customer's Customer compliance challenge." Press Release, SWIFT, November 12, 2014. <https://www.swift.com/insights/press-releases/swift-addresses-the-know-your-customer-compliance-challenge>.
- Taylor, Mark. "FATF chief talks de-risking dangers and correspondent banking." LinkedIn, March 29, 2016. <https://www.linkedin.com/pulse/fatf-chief-talks-de-risking-dangers-correspondent-banking-mark-taylor>.
- Zarate, Juan C. and Poncy, Chip. "Designing a New AML System." Banking Perspectives, The Clearing House. <https://www.theclearinghouse.org/research/banking-perspectives/2016/2016-q3-banking-perspectives/a-new-aml-system>.
- Zerden, Alex. "Four Pressing Issues in Combating Terrorism Financing." American Banker, August 20, 2015. <http://www.americanbanker.com/bankthink/four-pressing-issues-in-combatting-terrorism-financing-1076102-1.html>.

Reports

- Adisa, Bukola. “AML De-Risking: An effective method of plugging AML control failures?” ACAMS, 2014. <http://www.acams.org/wp-content/uploads/2015/08/AML-De-Risking-An-effective-method-of-plugging-AML-control-failures-B-Adisa.pdf>.
- Bank for International Settlements. “Committee on Payments and Market Infrastructures: Correspondent Banking.” BIS, July 2016. <http://www.bis.org/cpmi/publ/d147.pdf>.
- Bester, H., D. Chamberlain, L. De Koker, C. Hougaard, R. Short, A. Smith and R. Walker. “Implementing FATF Standards in Developing Countries and Financial Inclusion: Findings and Guidelines.” The FIRST Initiative, May 2008. (Washington, DC: The World Bank). http://www.cenfri.org/documents/AML/AML_CFT%20and%20Financial%20Inclusion.pdf.
- Blackbaud. “Luminate Online Benchmark Report 2015.” Blackbaud, 2015. <http://luminatebenchmarkreport.com/LuminateBenchmarkReport2015-R.pdf>.
- Charity Finance Group. “Briefing: Impact of banks’ de-risking on Not for Profit Organisations.” Charity Finance Group, March 2015. <http://www.cfg.org.uk/Policy/~media/Files/Policy/Banking/Briefing%20%20Impact%20of%20banks%20derisking%20activities%20on%20charities%20%20March%202015.pdf>.
- Charity & Security Network. “Safeguarding Humanitarianism in Armed Conflict.” Charity & Security Network, June 2012. <http://www.charityandsecurity.org/sites/default/files/Safeguarding%20Humanitarianism%20Final.pdf>.
- Charity & Security Network. “U.S. Muslim Charities and the War on Terror: A Decade in Review.” Charity & Security Network, December 2011. <http://www.charityandsecurity.org/system/files/USMuslimCharitiesAndTheWarOnTerror.pdf>.
- Development Initiatives. “Global Humanitarian Assistance Report of 2016.” Development Initiatives, 2016. <http://www.globalhumanitarianassistance.org/wp-content/uploads/2016/07/GHA-report-2016-full-report.pdf>.
- Dow Jones. “2015 Global Anti–Money Laundering Survey Results: Detailed Report.” Risk & Compliance, March 2015 Presentation. <http://images.dowjones.com/company/wp-content/uploads/sites/15/2015/03/Dow-Jones-ACAMS-AML-Survey-2015.pdf>.
- Dow Jones and ACAMS. “Global Anti-Money Laundering Survey Results.” Dow Jones and ACAMS, 2016. http://files.acams.org/pdfs/2016/Dow_Jones_and_ACAMS_Global_Anti-Money_Laundering_Survey_Results_2016.pdf.
- Durner, Tracey and Shetret, Liat. “Understanding bank derisking and its effects on financial inclusion: An exploratory study.” Oxfam and Global Center on Cooperative Security, November 2015. https://www.oxfam.org/sites/www.oxfam.org/files/file_attachments/rr-bank-de-risking-181115-en_0.pdf.
- Ehret, Todd. “Top Ten Concerns for U.S. Compliance Officers in 2016.” Thomson Reuters Regulatory Intelligence, 2016. <http://legalexecutiveinstitute.com/concerns-compliance-officers-2016/>.
- English, Stacey and Hammond, Susannah. “Cost of Compliance.” Thomson Reuters, 2016. <https://risk.thomsonreuters.com/content/dam/openweb/documents/pdf/risk/report/cost-compliance-2016.pdf>.
- Erbenová, Michaela, Liu, Yan, Kyriakos-Saad, Nadim, López-Mejía, Alejandro, Gasha, Giancarlo, Mathias, Emmanuel, Norat, Mohamed, Fernando, Francisca, and Almeida, Yasmin. “The Withdrawal of Correspondent Banking Relationships: A Case for Policy Action.” IMF Staff Discussion Note, June 2016. <https://www.imf.org/external/pubs/ft/sdn/2016/sdn1606.pdf>.
- Esslemont, Tom. “Syrians suffer as anti-terror laws squeeze charities – survey.” Thomson Reuters Foundation, February 24, 2016. <http://news.trust.org/item/20160224000357-rtjoh>.
- FATF. “FATF IX Special Recommendations.” Financial Action Task Force, October 2001. <http://www.fatf-gafi.org/media/fatf/documents/reports/FATF%20Standards%20-%20IX%20Special%20Recommendations%20and%20IN%20rc.pdf>.
- FATF. “Guidance on the Risk-Based Approach to Combating Money Laundering and Terrorist Financing: High Level Principles and Procedures.” Paris: Financial Action Task Force and OECD, June 2007. <http://www.fatf-gafi.org/publications/fatfrecommendations/documents/fatfguidanceontherisk-basedapproachtocombatingmoneylaunderingandterroristfinancing-highlevelprinciplesandprocedures.html>.
- FATF. “Terrorist Financing.” Paris: Financial Action Task Force and OECD, 2008. <http://www.fatf-gafi.org/media/fatf/documents/reports/FATF%20Terrorist%20Financing%20Typologies%20Report.pdf>.

- FATF. “Best Practices Paper: Sharing Among Domestic Competent Authorities Information Related to the Financing of Proliferation.” Paris: Financial Action Task Force and OECD, 2012a. <http://www.fatf-gafi.org/media/fatf/documents/recommendations/BPP%20on%20Recommendation%202%20Sharing%20among%20domestic%20competent%20authorities%20re%20financing%20of%20proliferation.pdf>.
- FATF. “Financial Action Task Force Mandate (2012–2020).” Washington D.C.: Financial Action Task Force, 2012b. <http://www.fatf-gafi.org/media/fatf/documents/FINAL%20FATF%20MANDATE%202012-2020.pdf>.
- FATF. “International Standards on Combating Money Laundering and the Financing of Terrorism and Proliferation: The FATF Recommendations.” Paris: Financial Action Task Force and OECD, 2012c. Last updated October 2016. <http://www.fatf-gafi.org/publications/fatfrecommendations/documents/fatf-recommendations.html>.
- FATF. “Anti-Money Laundering and Terrorist Financing Measures and Financial Inclusion.” Financial Action Task Force, February 2013. http://www.fatf-gafi.org/media/fatf/documents/reports/AML_CFT_Measures_and_Financial_Inclusion_2013.pdf.
- FATF. “Combating the Abuse of Non-Profit Organisations (Recommendation 8).” Paris: Financial Action Task Force and OECD, 2013a. Last updated June 2015. <http://www.fatf-gafi.org/publications/fatfrecommendations/documents/bpp-combating-abuse-npo.html>.
- FATF. “Methodology for Assessing Technical Compliance with the FATF Recommendations and the Effectiveness of AML/ CFT Systems.” Paris: Financial Action Task Force and OECD, 2013b. <http://www.fatf-gafi.org/media/fatf/documents/methodology/FATF%20Methodology%2022%20Feb%202013.pdf>.
- FATF. “De-risking: Global Impact and Unintended Consequences for Exclusion and Stability.” Financial Action Task Force, October 2014. https://classic.regonline.com/custImages/340000/341739/G24%20AFI/G24_2015/De-risking_Report.pdf.
- FATF. “FATF clarifies risk-based approach: case by case, not wholesale de-risking.” Financial Action Task Force, 2014. Last modified October 28, 2014. <http://www.fatf-gafi.org/publications/fatfgeneral/documents/rba-and-de-risking.html>.
- FATF. “FATF Public Statement, Improving Global AML/CFT Compliance: Ongoing Process.” Financial Action Task Force, October 24, 2014. <http://www.fatf-gafi.org/publications/high-riskandnon-cooperativejurisdictions/documents/fatf-compliance-oct-2014.html>.
- FATF. 2014. “FATF Targeted Financial Sanctions Experts’ meeting.” Financial Action Task Force, 2014. Last modified June 22, 2014. <http://www.fatf-gafi.org/documents/news/targeted-financial-sanctions-expert-meeting-2014.html>.
- FATF. “Guidance for a Risk-Based Approach: The Banking Sector.” Financial Action Task Force, October 2014. <http://www.fatf-gafi.org/media/fatf/documents/reports/Risk-Based-Approach-Banking-Sector.pdf>.
- FATF. “Risk of Terrorist Abuse in Non-Profit Organisations.” Paris: Financial Action Task Force and OECD, 2014. <http://www.fatf-gafi.org/media/fatf/documents/reports/Risk-of-terrorist-abuse-in-non-profit-organisations.pdf>.
- FATF. “The danger of driving both illicit markets and financial exclusion.” Remarks from FATF President Roger Wilkins AO, delivered at the 6th Annual International Conference on Financial Crime and Terrorism Financing, Kuala Lumpur, 8 October 2014. <http://www.fatf-gafi.org/fr/themes/recommandationsgafi/documents/danger-illicit-markets-financial-exclusion.html>.
- FATF. “Drivers for ‘de-risking’ go beyond anti-money laundering/terrorist financing.” Financial Action Task Force, 2015. Last modified June 26, 2015. <http://www.fatf-gafi.org/documents/news/derisking-goes-beyond-amlcft.html>.
- FATF. “FATF Guidance for a Risk-Based Approach: Effective Supervision and Enforcement by AML/CFT Supervisors of the Financial Sector and Law Enforcement.” The Financial Action Task Force, October 2015. <http://www.fatf-gafi.org/media/fatf/documents/reports/RBA-Effective-supervision-and-enforcement.pdf>.
- FATF. “FATF Report: Financing of the Terrorist Organisation Islamic State in Iraq and the Levant (ISIL).” The Financial Action Task Force, February 2015. <http://www.fatf-gafi.org/media/fatf/documents/reports/Financing-of-the-terrorist-organisation-ISIL.pdf>.
- FATF. “FATF takes action to tackle de-risking.” Financial Action Task Force, October 23, 2015. <http://www.fatf-gafi.org/publications/fatfrecommendations/documents/fatf-action-to-tackle-de-risking.html>.
- FATF. “Anti-money laundering and counter-terrorist financing measures - United States: Mutual Evaluation Report.” Financial Action Task Force, December 2016. <http://www.fatf-gafi.org/publications/mutualevaluations/documents/mer-united-states-2016.html>.

- FATF. “Guidance on Correspondent Banking.” Financial Action Task Force, October 2016. <http://www.fatf-gafi.org/media/fatf/documents/reports/Guidance-Correspondent-Banking-Services.pdf>.
- FATF. “Outcomes of the Plenary meeting of the FATF, Busan Korea, 22–24 (June 2016).” Financial Action Task Force, June 2016. <http://www.fatf-gafi.org/publications/fatfgeneral/documents/plenary-outcomes-june-2016.html>.
- FATF. “Risk-Based Approach Guidance for Money Service Businesses.” Financial Action Task Force, February 2016. <http://www.fatf-gafi.org/media/fatf/documents/reports/Guidance-RBA-money-value-transfer-services.pdf>.
- Financial Stability Board. “Report to the G20 on actions taken to assess and address the decline in correspondent banking.” Financial Stability Board, November 6, 2015. www.fsb.org/wp-content/uploads/Correspondent-banking-report-to-G20-Summit.pdf.
- G-7. “G-7 Action Plan on Combatting the Financing of Terrorism.” May 20-21, 2016. http://www.g7sendai2016.mof.go.jp/summary/pdf/g7_action_plan_on_cft_en.pdf.
- Harvard Law School. “An Analysis of Contemporary Anti-Diversion Policies and Practices of Humanitarian Organizations.” Harvard Law School, Project on Law and Security, May 2014. http://blogs.harvard.edu/cheoproject/files/2013/10/CHE_Project_-_Anti-Diversion_Policies_of_Humanitarian_Organizations_May_2014.pdf.
- Hayes, Ben. “Counterterrorism, ‘Policy Laundering’ and the FATF: Legalising Surveillance, Regulating Civil Society.” The Transnational Institute/Statewatch, February 2012. <https://www.tni.org/en/publication/counter-terrorism-policy-laundering-and-the-fatf>.
- Humanitarian Outcomes for InterAction. “Residual Risk Acceptance: An Advocacy Guidance.” Humanitarian Outcomes for InterAction, September 2016. https://www.humanitarianoutcomes.org/sites/default/files/residual_risk_advocacy_guidance_note.pdf.
- IMF. “The IMF and the Fight Against Money Laundering and the Financing of Terrorism.” International Monetary Fund, Washington D.C., 2015. <http://www.imf.org/About/Factsheets/Sheets/2016/08/01/16/31/Fight-Against-Money-Laundering-the-Financing-of-Terrorism?pdf=1>.
- Jeans, Neil. “Risk-Based Approach to KYC: Sound Concept, Complex Reality.” Thomson Reuters, 2016. <https://risk.thomsonreuters.com/content/dam/openweb/documents/pdf/risk/white-paper/risk-based-approach-kyc-white-paper.pdf>.
- Keatinge, Tom. “Uncharitable Behaviour.” London: Demos, 2014. <https://www.demos.co.uk/files/DEMOSuncharitablebehaviourREPORT.pdf>.
- KPMG. “KPMG Global Anti-Money Laundering Survey.” KPMG LLP, 2014. <https://assets.kpmg.com/content/dam/kpmg/pdf/2014/02/global-anti-money-laundering-survey-v5.pdf>.
- Lowery, Clay and Ramachandran, Vijaya. “Unintended Consequences of Anti-Money Laundering Policies for Poor Countries A CGD Working Group Report.” Center for Global Development, 2015. <http://www.cgdev.org/sites/default/files/CGD-WG-Report-Unintended-Consequences-AML-Policies-2015.pdf>.
- McKeever, Brice S. “The Nonprofit Sector in Brief 2015.” Urban Institute, October 2015. <http://www.urban.org/sites/default/files/alfresco/publication-pdfs/2000497-The-Nonprofit-Sector-in-Brief-2015-Public-Charities-Giving-and-Volunteering.pdf>.
- OMB Watch and Grantmakers Without Borders. “Collateral Damage: How the War on Terror Hurts Charities, Foundations, and the People They Serve.” OMB Watch and Grantmakers Without Borders, July 2008. <http://www.ombwatch.org/sites/default/files/npadv/PDF/collateraldamage.pdf>.
- Orozco, Manuel and Yansura, Julia. “Keeping the Lifeline Open: Remittances and Markets in Somalia.” Oxfam, 2014. <https://www.oxfamamerica.org/static/media/files/somalia-remittance-report-web.pdf>.
- Prendergast, John and Brooks-Rubin, Brad. “Modernized Sanctions for Sudan: Unfinished Business for the Obama Administration.” The Enough Project, April 2016. http://www.enoughproject.org/files/Modernized_Sanctions_for_Sudan_042016.pdf.
- Protiviti. “Guide to U.S. Anti-Money Laundering Requirements: Frequently Asked Questions, 5th ed.” Protiviti Inc., 2014. https://www.protiviti.com/sites/default/files/united_states/insights/guide-to-U.S.-aml-requirements-6thedition-protiviti_0.pdf.
- PwC. “Integrating Technology into your Compliance Program to Improve Effectiveness and Efficiency.” PricewaterhouseCoopers, 2011. http://www.financial-tracking.com/docs/pwc_integrating-technology-into-your-compliance-program.pdf.

- Reid, Elizabeth J. and Kerlin, Janelle A. “The International Charitable Nonprofit Subsector in the United States: International Understanding, International Development and Assistance, and International Affairs.” The Urban Institute Center on Nonprofits and Philanthropy, January 18, 2006. <http://www.urban.org/sites/default/files/alfresco/publication-pdfs/411276-The-International-Charitable-Nonprofit-Subsector-in-the-United-States.PDF>.
- Royal United Services Institute and The Prevention Project. “CVE Practitioner Workshop: Opportunities and Challenges for Civil Society in Pushing Back Against Violent Extremism.” RUSI, July 26-27, 2016. <http://www.organizingagainstve.org/wp-content/uploads/2016/08/Formatted-CVE-Practitioner-Conference.pdf>.
- The Wolfsberg Group. “Wolfsberg Anti-Money Laundering Principles for Correspondent Banking.” The Wolfsberg Group, 2014. <http://www.wolfsberg-principles.com/pdf/standards/Wolfsberg-Correspondent-Banking-Principles-2014.pdf>.
- The World Bank. “Annual Report 2016.” The World Bank, 2016. <http://www.worldbank.org/en/about/annual-report>.
- The World Bank. “Global Reporting Initiative Index 2015.” The World Bank, October 2015. <http://documents.worldbank.org/curated/en/523821467987823156/pdf/100004-WP-PUBLIC-Box393216B-World-Bank-GRI-Index-2015.pdf>.
- The World Bank. “Report on the G-20 Survey on De-risking Activities in the Remittance Market.” The World Bank, October 2015. <http://documents.worldbank.org/curated/en/679881467993185572/pdf/101071-WP-PUBLIC-GPFI-DWG-Remittances-De-risking-Report-2015-Final-2.pdf>.
- The World Bank. “Stakeholder Dialogue on De-risking Findings and Recommendations.” The World Bank Group and ACAMS, 2016. <http://files.acams.org/pdfs/2016/Derisking-Final.pdf>.
- The World Bank. “Stakeholder Engagement and Grievance Mechanisms.” World Bank Group publication: Getting to Green—A Sourcebook of Pollution Management Policy Tools for Growth and Competitiveness. http://siteresources.worldbank.org/INTRANETENVIRONMENT/Resources/244351-1279901011064/StakeholderEngagement-andGrievanceMechanisms_111031.pdf.
- The World Bank. “Survey on De-Risking.” The World Bank Group, Washington D.C., 2015. <http://www.worldbank.org/en/topic/financialmarketintegrity/publication/world-bank-group-surveys-probe-derisking-practices>.
- The World Bank. “The World Bank Risk Assessment Methodology.” The World Bank. http://www.fatf-gafi.org/media/fatf/documents/reports/risk_assessment_world_bank.pdf.
- The World Bank. “Withdrawal from Correspondent Banking: Where, Why, and What to Do About It.” The World Bank, November 2015. <http://documents.worldbank.org/curated/en/113021467990964789/pdf/101098-revised-PUBLIC-CBR-Report-November-2015.pdf>.
- Warden, Staci. “Framing the Issues: De-Risking and Its consequences for Global Commerce and the Financial System.” Center for Financial Markets, July 14, 2015. <http://www.milkeninstitute.org/publications/view/727>.
- Van der Does de Willebois, Emile. “Nonprofit Organizations and the Combatting of Terrorism Financing.” World Bank Working Paper No. 208, World Bank Group, Washington D.C., 2010. <http://documents.worldbank.org/curated/en/295461468181481074/pdf/578790PUB0Comb101public10BOX353783B.pdf>.

United Kingdom Government Documents

- Artingstall, David, Dove, Nick, Howell, John, and Levi, Michael. “Drivers & Impacts of Derisking: A study of representative views and data in the UK, by John Howell & Co. Ltd. for the Financial Conduct Authority.” Financial Conduct Authority, February 2016. <https://www.fca.org.uk/publication/research/drivers-impacts-of-derisking.pdf>.
- Financial Conduct Authority. “Banks’ Management of High Money Laundering Risk Situations.” Financial Services Authority, June 2011. http://www.fsa.gov.uk/pubs/other/aml_final_report.pdf.
- Financial Conduct Authority. “Anti-money laundering annual report.” Financial Conduct Authority, January 2014. <https://www.fca.org.uk/publication/corporate/anti-money-laundering-annual-report-13-14.pdf>.
- The Commonwealth. “Disconnecting from Global Finance - De-risking: The Impact of AML/CFT Regulations in Commonwealth Developing Countries”. The Commonwealth, 2016. <http://thecommonwealth.org/sites/default/files/inline/DisconnectingfromGlobalFinance2016.pdf>.

- UK House of Lords and House of Commons. “Joint Committee on the Draft Protection of Charities Bill: Draft Protection of Charities Bill.” Report by authority of the House of Lords and House of Commons, February 2015. <http://www.publications.parliament.uk/pa/jt201415/jtselect/jtcharity/108/108.pdf>.

United Nations Documents

- Mackintosh, Kate and Duplat, Patrick. “Study of the Impact of Donor Counter-Terrorism Measures on Principled Humanitarian Action.” OCHA and NRC, 2013. https://docs.unocha.org/sites/dms/documents/ct_study_full_report.pdf.
- United Nations. “United Nations Millennium Declaration, para. 30, UN Doc. A/55/L.2.” UN General Assembly, September 8, 2000. <http://www.un.org/millennium/declaration/ares552e.htm>.
- United Nations. “CTITF Working Group Report: Tackling the Financing of Terrorism.” UN Counter-Terrorism Implementation Task Force. CTITF Publication Series, October 2009. http://www.un.org/en/terrorism/ctitf/pdfs/ctitf_financing_eng_final.pdf.
- United Nations. “Opening remarks at the 66th session of the Executive Committee of the High Commissioner’s Programme by António Guterres, United Nations High Commissioner for Refugees. Geneva, October 5, 2015.” UN. <http://www.unhcr.org/56122bd76.html>.
- Walker, Justine. “Study on Humanitarian Impact of Syria-Related Unilateral Restrictive Measures: A report prepared for the United Nations (UN) Economic & Social Commission for Western Asia (ESCWA) ‘National Agenda for the Future of Syria’.” Swiss Agency for Development and Cooperation SDC, May 16, 2016. <https://assets.documentcloud.org/documents/3115191/Hum-Impact-of-Syria-Related-Res-Eco-Measures-26.pdf>.

United States Government Documents

- Adam Szubin, Acting Under Secretary. “Remarks by Acting Under Secretary Adam Szubin at the ABA/ABA Money Laundering Enforcement Conference.” U.S. Department of the Treasury, November 14, 2016. <https://www.treasury.gov/press-center/press-releases/Pages/jl0608.aspx>.
- Adam Szubin, Acting Under Secretary. “Remarks by Acting Under Secretary Adam Szubin at the ABA/ABA Money Laundering Enforcement Conference.” U.S. Department of the Treasury, November 16, 2015. <https://www.treasury.gov/press-center/press-releases/Pages/jl0275.aspx>.
- David Cohen, Under Secretary. “Remarks by Under Secretary David Cohen at the ABA/ABA Money Laundering Enforcement Conference.” U.S. Department of the Treasury, November 10, 2014. <https://www.treasury.gov/press-center/press-releases/Pages/jl2692.aspx>.
- Federal Deposit Insurance Corporation. “Interagency Advisory: Guidance on Accepting Accounts from Foreign Embassies, Consulates and Missions.” FDIC, 24 March 2011. <https://www.fdic.gov/news/news/financial/2011/fil11017a.html>.
- Federal Deposit Insurance Corporation. “Manual of Examination Policies.” Federal Deposit Insurance Corporation Regulations Risk Management. FDIC. Sec. 14.1-3. <https://www.fdic.gov/regulations/safety/manual/section14-1.pdf>.
- Federal Deposit Insurance Corporation. “Statement on Providing Banking Services.” FDIC, 28 January 2015. <https://www.fdic.gov/news/news/financial/2015/fil15005.html>.
- Federal Deposit Insurance Corporation. “What We Do: Supervise Banks and Ensure Compliance with Fair Credit and Community Reinvestment Statutes.” FDIC. <https://www.fdic.gov/about/jobs/do.html#be>.
- Federal Financial Institutions Examination Council. “Bank Secrecy Act/Anti-Money Laundering Examination Manual Bank.” FFIEC. 311-312. https://www.ffiec.gov/bsa_aml_infobase/documents/bsa_aml_man_2014.pdf.
- Federal Financial Institutions Examination Council. “Bank Secrecy Act/Anti-Money Laundering InfoBase.” FFIEC. https://www.ffiec.gov/BSA_aml_infobase/pages_manual/OLM_095.htm.
- Federal Financial Institutions Examination Council. “Bank Secrecy Act/Anti-Money Laundering InfoBase: Suspicious U.S. Activity Reporting – Overview.” FFIEC. https://www.ffiec.gov/bsa_aml_infobase/pages_manual/OLM_015.htm.
- Federal Register. “Reliance Standards for Making Good Faith Determinations.” A Rule by the Internal Revenue Service on 09/25/2015. Federal Register, September 2015. <https://www.federalregister.gov/documents/2015/09/25/2015-24346/reliance-standards-for-making-good-faith-determinations>.

- Financial Crimes Enforcement Network. “FinCEN Joint Statement on Providing Banking Services to Money Services Businesses.” FinCEN, U.S. Department of the Treasury, March 30, 2005. <https://www.fincen.gov/news/news-releases/joint-statement-providing-banking-services-money-services-businesses>.
- Financial Crimes Enforcement Network. “FinCEN Statement on Providing Banking Services to Money Services Businesses.” FinCEN, U.S. Department of the Treasury, November 10, 2014. <https://www.fincen.gov/news/news-releases/statement>.
- Financial Crimes Enforcement Network. “Guidance on Accepting Accounts from Foreign Embassies, Consulates, and Missions.” FinCEN, March 24, 2011. https://www.fincen.gov/sites/default/files/guidance/FFIEC_FinCEN_24_march.pdf.
- Financial Crimes Enforcement Network. “Guidance to Money Services Businesses on Obtaining and Maintaining Banking Services.” FinCEN, April 26, 2014. <https://www.fincen.gov/sites/default/files/shared/fincenadv04262005.pdf>.
- Foreign Affairs Committee. “Stopping the Money Flow: War on Terror Finance.” Questions for the Record for Assistant Secretary Daniel Glaser. Joint Hearing Before Subcommittees of House Committees on Foreign Affairs and Armed Services, June 9, 2016. <https://foreignaffairs.house.gov/hearing/joint-subcommittee-hearing-stopping-money-flow-war-terror-finance/>.
- Fowler, Jennifer. “Treasury Efforts to Protect and Support the Charitable Sector.” Treasury Notes Blog, April 28, 2016. <https://www.treasury.gov/connect/blog/Pages/Treasury-Efforts-to-Protect-and-Support-the-Charitable-Sector.aspx>.
- Internal Revenue Service. “Annual Exempt Organization Return: Who Must File.” IRS www.irs.gov/charities-non-profits/annual-exempt-organization-return-who-must-file.
- Internal Revenue Service. “Exempt Purposes - Internal Revenue Code Section 501(c)(3).” IRS. <https://www.irs.gov/charities-non-profits/charitable-organizations/exempt-purposes-internal-revenue-code-section-501c3>.
- Internal Revenue Service. “Schedule F (Form 990), Statement of Activities Outside the United States, 2016.” IRS. www.irs.gov/pub/irs-pdf/f990sf.pdf.
- Internal Revenue Service. “Types of Tax-Exempt Organizations.” IRS. <https://www.irs.gov/charities-non-profits/types-of-tax-exempt-organizations>.
- Jennifer Fowler, Deputy Assistant Secretary. “Remarks by Deputy Assistant Secretary Jennifer Fowler at the SIFMA Anti-Money Laundering & Financial Crimes Conference.” U.S. Department of the Treasury, April 6, 2016. <https://www.treasury.gov/press-center/press-releases/Pages/jl0409.aspx>.
- Letter and statements at website of Senator Jeff Flake. “Flake, McCain Urge Agencies to Address Bank Closures on U.S.-Mexico Border.” Press Release, March 10, 2016. <http://www.flake.senate.gov/public/index.cfm?p=press-releases&id=2F767A64-5510-4364-A5BC-360EAC069D42>.
- Murphy, Edward V. “Who Regulates Whom and How? An Overview of U.S. Financial Regulatory Policy for Banking and Securities Markets.” Congressional Research Service, January 30, 2015. <https://fas.org/sgp/crs/misc/R43087.pdf>.
- Nathan Sheets, Under Secretary. “Remarks by Under Secretary Nathan Sheets at the Center for Global Development.” U.S. Department of the Treasury, November 12, 2015. <https://www.treasury.gov/press-center/press-releases/Pages/jl0264.aspx>.
- Office of the Comptroller of the Currency. “OCC Assesses a \$350 Million Civil Money Penalty Against JPMorgan Chase for Bank Secrecy Act Violations.” OCC, U.S. Department of the Treasury, January 7, 2014. <https://www.occ.treas.gov/news-issuances/news-releases/2014/nr-occ-2014-1.html>.
- Office of the Comptroller of the Currency. “OCC Bulletin 2014-058: Statement on Risk Management.” OCC, U.S. Department of the Treasury, November 19, 2014. <https://www.occ.gov/news-issuances/bulletins/2014/bulletin-2014-58.html>.
- Office of the Comptroller of the Currency. “Office of the Comptroller of the Currency, Examinations: Overview.” OCC. <https://www.occ.gov/topics/examinations/examinations-overview/index-examinations-overview.html>.
- Office of the Comptroller of the Currency Bulletin. “Risk Management Guidance on Periodic Risk Reevaluation of Foreign Correspondent Banking.” OCC. 2016-32, October 5, 2016. <https://www.occ.gov/news-issuances/bulletins/2016/bulletin-2016-32.html>.
- Roth, John, Greenberg, Douglas and Wille, Serena. “National Commission on Terrorist Attacks Upon the United States: Monograph on Terrorist Financing.” Staff Report to the Commission, 2004. http://govinfo.library.unt.edu/911/staff_statements/911_TerrFin_Monograph.pdf.

- Sheets, Nathan, Szubin, Adam and Gerety, Amias. “Complementary Goals - Protecting the Financial System from Abuse and Expanding Access to the Financial System.” Treasury Blog, August 30, 2016. <https://www.treasury.gov/connect/blog/Pages/Complementary-Goals---Protecting-the-Financial-System-from-Abuse-and-Expanding-Access-to-the-Financial-System.aspx>.
- Subcommittee on International Trade & Finance of the Senate Committee on Banking, Housing, and Urban Affairs. “The Role of Charities and NGO’s in the Financing of Terrorist Activities.” Hearing Before the Subcommittee on International Trade & Finance of the Senate Committee on Banking, Housing, and Urban Affairs, 107th Cong. 2002. (statement of Kenneth W. Dam, Deputy Secretary, U.S. Department of Treasury). <https://www.gpo.gov/fdsys/pkg/CHRG-107shrg89957/html/CHRG-107shrg89957.htm>.
- The White House. “President Freezes Terrorists’ Assets: Remarks by the President, Secretary of the Treasury O’Neill and Secretary of State Powell on Executive Order.” The White House, September 24, 2001. <https://georgewbush-whitehouse.archives.gov/news/releases/2001/09/20010924-4.html>.
- The White House. “U.S. National Security Strategy.” The White House, February 2015. https://www.whitehoU.S.e.gov/sites/default/files/docs/2015_national_security_strategy.pdf.
- Thomas J. Curry, Comptroller of the Currency. “Remarks by Thomas J. Curry at the ACAMS 15th Annual AML and Financial Crime Conference.” OCC, September 28, 2016. <http://www.acamstoday.org/remarks-by-thomas-j-curry/>.
- Thomas J. Curry, Comptroller of the Currency. “Remarks by Thomas J. Curry, Comptroller of the Currency, Before the Institute of International Bankers.” OCC, March 7, 2016. <https://www.occ.gov/news-issuances/speeches/2016/pub-speech-2016-25.pdf>.
- U.S. Congress. “Congressional letter to the Comptroller of the Currency on de-risking.” (Lead signatories Senators Jeff Flake and John McCain). U.S. Congress, May 26, 2016. <http://www.flake.senate.gov/public/cache/files/647cddc2-d848-4a65-a2a1-03a128d6f859/signed-may-26-derisking-letter-to-occ.pdf>.
- U.S. Department of State. “Country Reports on Terrorism 2014.” United States Department of State Publication, Bureau of Counterterrorism, Released June 2015. <https://www.state.gov/documents/organization/239631.pdf>.
- U.S. Department of State. “Country Reports on Terrorism 2015.” United States Department of State Publication, Bureau of Counterterrorism, Released June 2, 2016. <https://www.state.gov/documents/organization/258249.pdf>.
- U.S. Department of Treasury. “In the Matter of RIGGS BANK, N.A.” Financial Crimes Enforcement Network, No. 2004-01, May 13, 2004. https://www.fincen.gov/sites/default/files/enforcement_action/riggssassessment3.pdf.
- U.S. Department of the Treasury. “National Terrorist Financing Risk Assessment 2015.” Washington D.C., 2015. <https://www.treasury.gov/resource-center/terrorist-illicit-finance/Documents/National%20Terrorist%20Financing%20Risk%20Assessment%20%E2%80%932006-12-2015.pdf>.
- U.S. Department of the Treasury. “OFAC FAQs: General Questions.” U.S. Department of the Treasury. Accessed December 1, 2016. https://www.treasury.gov/resource-center/faqs/Sanctions/Pages/faq_general.aspx.
- U.S. Department of the Treasury. “Remarks by Acting Under Secretary Adam Szubin at the ABA/ABA Money Laundering Enforcement Conference.” U.S. Department of the Treasury, November 16, 2015. <https://www.treasury.gov/press-center/press-releases/Pages/jl0275.aspx>.
- U.S. Department of Treasury. “Treasury Anti-Terrorist Financing Guidelines: Voluntary Best Practices for U.S.-Based Charities.” U.S. Department of the Treasury, 2010. https://www.treasury.gov/resource-center/terrorist-illicit-finance/Documents/guidelines_charities.pdf.
- U.S. Department of Treasury. “U.S. Department of the Treasury and Federal Banking Agencies Joint Fact Sheet on Foreign Correspondent Banking: Approach to BSA/AML and OFAC Sanctions Supervision and Enforcement.” U.S. Department of Treasury, August 30, 2016. <https://www.treasury.gov/press-center/press-releases/Documents/Foreign%20Correspondent%20Banking%20Fact%20Sheet.pdf>.
- U.S. Senate Permanent Subcommittee on Investigations, of the Homeland Security and Governmental Affairs Committee. “U.S. Vulnerabilities to Money Laundering, Drugs, and Terrorist Financing: HSBC Case History.” U.S. Senate Permanent Subcommittee on Investigations, of the Homeland Security and Governmental Affairs Committee, Released July 17, 2012. <http://www.hsgac.senate.gov/subcommittees/investigations/hearings/U.S.-vulnerabilities-to-money-laundering-drugs-and-terrorist-financing-hsbc-case-history>.
- Weiss, Martin. 2016. “Remittances: Background and Issues for Congress.” Congressional Research Service, May 9, 2016. <https://www.fas.org/sgp/crs/misc/R43217.pdf>.

Web Resources

- Charity & Security Network. “Life for Relief & Development v. Bank of America, NA.” Charity & Security Network, August 19, 2016. <http://www.charityandsecurity.org/node/1434>.
- Charity & Security Network. “Listed Terrorist Groups and Humanitarian Crises.” Charity & Security Network website interactive map. <http://www.charityandsecurity.org/node/1437>.
- Guidestar. “About U.S.: Guidestar’s Mission.” <https://learn.guidestar.org/about-U.S./>.
- InterAction. “NGO Security: Overview.” InterAction. <https://www.interaction.org/project/ngo-security/overview>.
- Society for Worldwide Interbank Financial Telecommunication. “The KYC Registry: An Introductory Guide.” SWIFT. Accessed December 1, 2016. <https://www.swift.com/our-solutions/compliance-and-shared-services/financial-crime-compliance/the-kyc-registry>.

APPENDIX B

SURVEY QUESTIONS

Some NGOs have experienced problems accessing banking services for international transactions in recent years. I am going to list a number of problems that can be experienced when conducting an international transaction. Please answer yes or no if your organization has experienced any of the following problems that may occur with banking services:

1. Accounts closed
(1) No (1) Yes
2. Refused to open account
(1) No (1) Yes
3. Transfers delayed
(1) No (1) Yes
4. Unusual additional documentation requests
(1) No (1) Yes
5. Fee increases
(1) No (1) Yes
6. Have you experienced other problems in addition or beyond these?
(1) No (1) Yes

[If no to Q1 through Q6, skip to Q17]

7. Can you please specify?
[Verbatim]
8. For any of the previously mentioned problems, did the financial institution mention any particular reason?
[Verbatim]
9. How frequently have you experienced problems of the type or types you mentioned? Would you describe it (them) as:
 - (1) Rare
 - (2) Occasional – maybe once a year
 - (3) Regular – every few months
 - (4) Constant – ongoing, few breaks between incidents

Given the difficulty [your organization] experienced with international transactions, which of the following remedies to these problems have you sought? Please answer yes or no to each of the following:

10. Find another financial institution
(0) No (1) Yes
11. Use money remitter, such as Western Union or something similar
(0) No (1) Yes
12. Carry cash
(0) No (1) Yes
13. Cancel the program
(0) No (1) Yes
14. Tried transaction successfully again later
(0) No (1) Yes
15. Was there any other option that you used??
(0) No (1) Yes

[If no to Q10 through Q15, skip to Q17]

16. Can you please specify?
[Verbatim]

Now I am going to list a series of possible program areas that your international transfers may have been designed to support. As I go through the list, please answer “yes” or “no” to the areas your program was intended to support.

17. Public Health
(0) No (1) Yes
18. Humanitarian Relief
(0) No (1) Yes
19. Medical Services
(0) No (1) Yes
20. Education
(0) No (1) Yes

- 21. Development/Poverty Reduction
(0) No (1) Yes
- 22. Human Rights
(0) No (1) Yes
- 23. Democracy Building
(0) No (1) Yes
- 24. Peace operations or peace building
(0) No (1) Yes
- 25. Something else?
(0) No (1) Yes
- 26. Can you please specify?
[Verbatim]
- 27. Can you tell me which countries the transfers were intended for? [Verbatim]

Now to get a better sense as to whom charities operating abroad are interacting with, I am going to read you a list of possible intended money or fund recipients. Please just respond yes or no if any of the following are typically your intended recipient(s):

- 28. Your own field office
(0) No (1) Yes
- 29. The field office or program of another international NGO
(0) No (1) Yes
- 30. A local community organization
(0) No (1) Yes
- 31. A government office or agency in the target country
(0) No (1) Yes
- 32. Another group or individual?
(0) No (1) Yes

[If no to Q28 through Q31, skip to Q34]

- 33. Can you please tell us whom the intended recipient was? Please, don't tell us the person's name, just the organization type or the individual's title is all we are looking for.
[Verbatim]

34. Can you estimate for us the number of people that are served by your international programs annually?
[Enter numerical value as quoted, probe numeric estimate, or verbatim if not numeric]
35. And can you estimate the number of people who may be impacted by the difficulties you experienced with international financial transactions?

[Enter numerical value as quoted, probe numeric estimate, or verbatim if not numeric]
36. Generally speaking, have your organization's banking problems gotten better, worse, or stayed about the same over the last few years?
(1) Worse
(2) Stayed the same
(3) Better
37. Does your organization have support from the U.S. government, such as grants or contracts with agencies such as with USAID or the State Department?
(0) No (1) Yes
38. Does your group self-identify as a Muslim charity?
(0) No (1) Yes
39. Does your organization self-identify as a faith-based charity?
(0) No (1) Yes
40. And with which faith community does your organization identify? [Verbatim]
41. Finally, have I missed anything about banking services that you could tell me?
(0) No (1) Yes
42. Can you please specify?
[Verbatim]
43. Would you be willing to receive a callback to discuss on a confidential basis problems experienced with international financial processing in greater depth?
(0) No (1) Yes

Thank you very much for taking the time from your busy schedule. This has been very helpful.

APPENDIX C

IRS GEOGRAPHICAL REGIONS, FORM 990 SCHEDULE F INSTRUCTIONS

Available online at <https://www.irs.gov/pub/irs-pdf/i990sf.pdf>

Antarctica

Central America and the Caribbean

Antigua & Barbuda, Aruba, Bahamas, Barbados, Belize, Cayman Islands, Costa Rica, Cuba, Dominica, Dominican Republic, El Salvador, Grenada, Guadeloupe, Guatemala, Haiti, Honduras, Jamaica, Martinique, Nicaragua, Panama, St. Kitts & Nevis, St. Lucia, St. Vincent & the Grenadines, Trinidad & Tobago, Turks & Caicos Islands, and British Virgin Islands.

East Asia and the Pacific

Australia, Brunei, Burma, Cambodia, China (including Hong Kong), East Timor, Fiji, Indonesia, Japan, Kiribati, Korea, Laos, Malaysia, Marshall Islands, Micronesia, Mongolia, Nauru, New Zealand, North Korea, Palau, Papua New Guinea, Philippines, Samoa, Singapore, Solomon Islands, South Korea, Taiwan, Thailand, Timor-Leste, Tonga, Tuvalu, Vanuatu, and Vietnam.

Europe (Including Iceland and Greenland)

Albania, Andorra, Austria, Belgium, Bosnia & Herzegovina, Bulgaria, Croatia, Czech Republic, Denmark, Estonia, Finland, France, FYR Macedonia, Germany, Greece, Greenland, Holy See, Hungary, Iceland, Ireland, Italy, Kosovo, Latvia, Liechtenstein, Lithuania, Luxembourg, Monaco, Montenegro, the Netherlands, Norway, Poland, Portugal, Romania, San Marino, Serbia, Slovakia, Slovenia, Spain, Sweden, Switzerland, Turkey, and the United Kingdom (England, Northern Ireland, Scotland, and Wales).

Middle East and North Africa

Algeria, Bahrain, Djibouti, Egypt, Iran, Iraq, Israel, Jordan, Kuwait, Lebanon, Libya, Malta, Morocco, Oman, Qatar, Saudi Arabia, Syria, Tunisia, United Arab Emirates, West Bank and Gaza, and Yemen.

North America

Canada and Mexico, but not the United States.

Russia and Neighboring States

Armenia, Azerbaijan, Belarus, Georgia, Kazakhstan, Kyrgyzstan, Moldova, Russia, Tajikistan, Turkmenistan, Ukraine, and Uzbekistan.

South America

Argentina, Bolivia, Brazil, Chile, Colombia, Ecuador, French Guiana, Guyana, Paraguay, Peru, Suriname, Uruguay, and Venezuela.

South Asia

Afghanistan, Bangladesh, Bhutan, India, Maldives, Nepal, Pakistan, and Sri Lanka.

Sub-Saharan Africa

Angola, Benin, Botswana, Burkina Faso, Burundi, Cameroon, Cape Verde, Central African Republic, Chad, Comoros, Democratic Republic of the Congo, Republic of the Congo, Cote D'Ivoire, Equatorial Guinea, Eritrea, Ethiopia, Gabon, Gambia, Ghana, Guinea, Guinea Bissau, Kenya, Lesotho, Liberia, Madagascar, Malawi, Mali, Mauritania, Mauritius, Mozambique, Namibia, Nigeria, Rwanda, Sao Tome & Principe, Senegal, Seychelles, Sierra Leone, Somalia, South Africa, Sudan, Swaziland, Tanzania, Togo, Uganda, Zambia, and Zimbabwe.