



Info@ZachorLegal.org

January 24, 2022

Via Email
Donna Myers, CEO and
Debbie Williams, VP Finance and Accounting
Salsa Labs, Inc.

Dear Ms. Myers and Ms. Williams:

On behalf of Zachor Legal Institute the undersigned respectfully asks Salsa Labs, Inc. ("Salsa") to investigate the account of an organization known as [The Alliance for Global Justice](#) ("AFGJ"), a Tucson, Arizona, based organization, that uses the Salsa platform to process donations for a terrorist organization.

By way of background, Zachor Legal Institute has been active in legal issues relating to civil liberties and the Constitution and has an active United States Supreme Court practice. The founder of Zachor Legal Institute is the author of a number of legal papers analyzing constitutional issues with an emphasis on anti-discrimination laws and the First Amendment. Relevant for the purposes of this letter are the founder's papers "The BDS Movement: That Which We Call A Foreign Boycott, By Any Other Name, Is Still Illegal" (the "**RWU Paper**", published in the Roger Williams Law Review and available for download at https://docs.rwu.edu/rwu_LR/vol22/iss1/2/) and "Boycotting The Boycotters: Turnabout Is Fair Play Under The Commerce Clause And The Unconstitutional Conditions Doctrine" (the "**Campbell Paper**", published in the Campbell Law Review and available for download at [https://www.campbelllawreview.com/s/Boycotting-the-Boycotters -Turnabout-Is-Fair-Play-Under-the-Comme-xys5.pdf](https://www.campbelllawreview.com/s/Boycotting-the-Boycotters-Turnabout-Is-Fair-Play-Under-the-Comme-xys5.pdf)).

After significant research, we have found that AFGJ is providing [fiscal sponsorship](#) and payment services through its platform to an organization designated as a terrorist group by the name of Samidoun. Part of these services includes receiving donations by using the Salsa Platform (see <https://afgj.salsalabs.org/samidounnetwork/index.html>).

While we understand that your company is required by various laws to know your customers, the fact that you are doing business with an organization that provides funding for a designated terror group indicates that AFGJ may have slipped through your compliance reviews. By providing the payment services to Samidoun, we believe that AFGJ is enabling the transfer of funds to an organization involved in terrorist activity in violation of federal law.

Specifically, we would like to refer your attention to the following:

- Samidoun is a North American-based non-governmental organization which has significant ties with the Popular Front for the Liberation of Palestine (PFLP), a designated terrorist organization in the US as well as additional countries in the world;
- [Recently](#) Samidoun [was designated as a terrorist organization by Israel](#);
- Much of Samidoun's leadership overlaps with members of the PFLP, with a number of Samidoun leaders being senior members of the PFLP and even members of the PFLP Central Committee;
- The chief coordinator of Samidoun is Khaled Barakat. Barakat is a senior member of PFLP, and in the past served as the head of PFLP abroad;
- Additional members of Samidoun include the following terror-related individuals:
 - Charlotte Kates – International coordinator of Samidoun. Wife of Khaled Barakat;
 - Mohammed Khatib – PFLP activist in Belgium. Samidoun coordinator in Europe;
 - Mustapha Awad – PFLP activist in Belgium. He was imprisoned in Israel, after he was sent by the PFLP to Lebanon, where he underwent military training by Hezbollah. Afterwards, he arrived in Israel to promote the activities of Samidoun. Currently, he is still an activist of the PFLP in Belgium;
 - Maram Saadi – Samidoun coordinator in Lebanon. Associated with the PFLP and Hezbollah; and
- Samidoun runs campaigns that support and/or glorify convicted terrorists and the PFLP campaign website uses elements identical to those on the Samidoun website.

Donate to the Samidoun Network

1 Amount 2 Your info 3 Payment

Make this donation recurring

\$10 \$25 \$50 \$75 \$100 \$ Other

Next

Make a Donation

Your donation is tax deductible. Samidoun Palestinian Prisoner Solidarity Network is a fiscally sponsored project of the Alliance for Global Justice, a 501(c)(3) Organization. Please note, your card statement will show this as a donation to Alliance for Global Justice.

NBCIF - National Bureau for Counter Terror Financing of Israel
המטה הלאומי ללוחמה כלכלית בטרור | מט"ל

About Us Designations Seizures International Legislation Administrative Decisions

Israel Designates "Samidoun" As A Terrorist Organization

As part of the campaign against the PFLP, Minister of Defense Gantz signs order designating "Samidoun", which acts on the PFLP's behalf abroad, as a terrorist organization

In light of the above, it is clear that Samidoun is an alter ego of the designated terror organization PFLP.¹ Further, based on our research, we believe that donations made to Samidoun by using the Salsa-enabled AFGJ platform have provided support to, and if allowed to continue to use your services will continue to support, designated terror organizations and specific terrorist activities throughout the world. As such, AFGJ, as the fiscal sponsor of Samidoun, appears to be providing material support to terror in violation of 18 U.S.C. § 2339A and B as well as support for international terrorism in violation of the criminal and civil provisions of the United States' Anti-Terrorism Act (18 U.S.C. § 2331 et seq.).

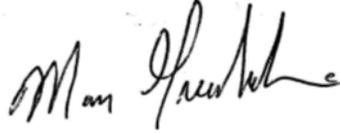
Other companies that have previously enabled AFGJ's funding of Samidoun have terminated their relationships with AFGJ upon being informed of the illicit use of their platforms, such as [Mastercard, Visa and American Express](#), as well as [PayPal, Donorbox and Plaid](#) and [Discover](#).

Since AFGJ uses your services to collect donations in support of Samidoun, a PFLP affiliate, we strongly urge you to take this information into consideration when reviewing its account for compliance with your rules and laws applicable to your company.

¹ Further details on the connection between Samidoun and the PFLP can be found in the brief we filed in district court in Arizona, available at <https://zachorlegal.org/wp-content/uploads/2018/02/Zachor-Legal-Institutes-Amicus-Brief-Filed-in-support-of-Arizona-HB-2617.pdf?189db0&189db0>.

Please contact me at marc@ZachorLegal.org or 925-328-0128 should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Marc Greendorfer". The signature is written in a cursive style with a prominent initial "M" and a long, sweeping underline.

Marc Greendorfer