



Info@ZachorLegal.org

February 16, 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 asks for an update on whether Salsa Labs, Inc. (“Salsa”) intends 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 as we requested in our letter of January 24, 2022 (the “Initial Letter”). We sent a reminder email on February 5, 2022 and have not received a response.

We refer to our Initial Letter for the facts and legal analysis on the use of your platform by AFGJ to provide funding to Samidoun, an organization with extensive ties to the designated foreign terrorist organization Popular Front for the Liberation of Palestine (“PFLP”) and also include additional information herein on a new campaign by AFGJ using the Salsa platform (the “Barakat Campaign”).

Since we sent you the Initial Letter we have learned of another Salsa-enabled AFGJ fundraiser, this time to provide funding for Khaled Barakat, an executive at the PFLP proxy Samidoun.<sup>1</sup> The Initial Letter provided a detailed explanation of the connections between Samidoun and PFLP but the Barakat Campaign brings Salsa directly into non-compliance with the rules and regulations of the United States Department of Treasury’s Office of Foreign Assets Control (“OFAC”) due to the direct connection between the fundraiser and the PFLP, an entity named by the United States as a foreign terror organization.

As OFAC states on its website, it “administers and enforces economic and trade sanctions based on US foreign policy and national security goals against targeted foreign countries and regimes, terrorists, international narcotics traffickers, those engaged in activities related to the proliferation of weapons of mass destruction, and other threats to the national security, foreign policy or economy of the United States.”<sup>2</sup>

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<sup>1</sup> <https://afgj.salsalabs.org/samidoun-khaled-barakatn/index.html>

<sup>2</sup> <https://home.treasury.gov/policy-issues/office-of-foreign-assets-control-sanctions-programs-and-information>

In particular, OFAC publishes a list of Specially Designated Nationals and Blocked Persons (“SDN”), individuals and entities who have been determined to be prohibited from conducting financial affairs with or in the United States and United States person (including Salsa). The PFLP is an SDN and Salsa is thus prohibited from engaging in financial transactions with or on behalf of the PFLP.<sup>3</sup>

As we informed you in the Initial Letter, Khaled Barakat, the beneficiary of the Barakat Campaign facilitated by Salsa, is a senior leader of PFLP. The Barakat Campaign is intended to provide funding for the legal defense of Khaled Barakat to enable his continued leadership of PFLP and facilitate PFLP’s ongoing terror activities. Germany has barred Barakat from entering the country due to his terror activities on behalf of the PFLP.<sup>4</sup>

At this point, it is clear that Salsa’s platform is being used to facilitate payments to and on behalf of an SDN as well as other terror groups that have connections to the SDN (including, but not limited to, Samidoun, the subject of our Initial Letter).

We would prefer to see Salsa regulate its own activities and simply refuse to continue to provide funding to terror groups and related entities, but if we do not hear back from Salsa as to its obligations to comply with anti-terror financing laws and regulations, we will have to forward our report to the appropriate government agencies (including the Treasury Department) for potential violations of, among other things, OFAC rules and regulations.

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 fluid and cursive, with the first name "Marc" clearly legible.

Marc Greendorfer

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<sup>3</sup> <https://sanctionssearch.ofac.treas.gov/Details.aspx?id=4709>

<sup>4</sup> <https://www.jpost.com/diaspora/antisemitism/berlin-confirms-to-the-post-it-banned-palestinian-terrorist-for-4-years-624622>