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Merrick Garland  
Attorney General  
US Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, DC 20530-0001

**Re: Request for Investigation of Seven Affiliates of a Designated Foreign Terror Organization.**

Dear Attorney General Garland

In July 2018, the undersigned's organization, Zachor Legal Institute ("**Zachor**"), sent a letter to then-Attorney General Jeff Sessions (the "**2018 Letter**") detailing the activities of certain groups acting in the United States on behalf of designated foreign terror organizations. A copy of that letter can be viewed at Zachor's website, <https://zachorlegal.org/wp-content/uploads/2018/11/Final-DOJ-Letter.pdf>. We encourage you to read the 2018 Letter in its entirety to understand the evolution of the groups promoting foreign terror organizations and their affiliations as well as our request for a Department of Justice ("**DOJ**") investigation of both the groups identified in the 2018 Letter as well as the groups discussed below.

The 2018 Letter provided an exhaustive summary of the activities of a number of entities that provided, and continue to provide, material support to designated foreign terror organizations, including, but not limited to, Hamas, the Popular Front for the Liberation of Palestine ("**PFLP**") and Palestine Islamic Jihad (collectively, the "**Designated Terror Organizations**"). The 2018 Letter also documented how self-professed civil rights organizations, such as one named Samidoun (discussed herein), are an alter ego of at least one of the Designated Terror Organizations and work in conjunction with other affiliated groups as part of the antisemitic campaign known as the Boycott, Divest and Sanction ("**BDS**") movement to spread terror, violence and other hate against American Jews.

The investigation, if any, by the DOJ in response to the 2018 Letter did not address the threat posed by terror groups promoting BDS in the United States. Since the 2018 Letter, BDS activity in the United States has escalated and more groups aligned with the Designated Terror Organizations have become active, employing violent tactics that have spread across the country in connection with emboldened BDS provocations. Attacks on Jews, both in the United States and worldwide, have actually escalated since the time of the 2018 Letter.

The following is an addendum to our 2018 Letter to provide further evidence that specific organizations that operate in the United States, in addition to those identified as "**Domestic Terror Affiliates**" in the 2018 Letter, continue to provide material support to the Designated Terror Organizations. These organizations are referred to herein as the "**Seven PFLP Proxies**" and are identified herein and this letter is based on testimony that has been made public from insiders of the Seven PFLP Proxies.

The Seven PFLP Proxies promote terror both in a direct as well as a stochastic manner through the incitement of BDS groups in the United States. We again ask the DOJ to investigate both the Domestic Terror Affiliates and the Seven PFLP proxies for their violations of federal laws relating to terrorism and organized crime.

## Background

In February 2021, the Israeli Ministry of Defense designated the Seven PFLP Proxies as illegal terrorist groups<sup>1</sup> that act on behalf of the PFLP, an entity that the United States Department of State has designated as a foreign terrorist organization since October 8, 1997.<sup>2</sup> The Seven PFLP Proxies are

1. The Samidoun Palestinian Prisoner Solidarity Network (“**Samidoun**”);
2. The Union of Palestinian Women's Committees (“**UPWC**”);
3. ADDAMEER - Prisoner Support and Human Rights Association (“**Addameer**”);
4. Bisan Center for Research and Development (“**Bisan**”);
5. Al-Haq Organization (“**Al Haq**”);
6. Defense for Children International – Palestine (“**DCI-P**”); and
7. Union of Agricultural Work Committees (“**UAWC**”).

The designation of the Seven PFLP Proxies as terror groups was based in part on an investigation and subsequent report from the Shin Bet, Israel’s analog to the United States’ Federal Bureau of Investigation. The Shin Bet relied upon testimony from insiders of at least one of the Seven PFLP Proxies and a corresponding investigation, and while the Shin Bet report has not been made public, parts of it have leaked online.<sup>3</sup> In August 2022, following up on what was disclosed by the insiders regarding the Seven PFLP Proxies being alter egos of the PFLP, the Israeli government raided the offices of a number of the Seven PFLP Proxies to obtain more detailed evidence of their work on behalf of other terror organizations, including the PFLP. Though no further information on the results of the raids has been made public it is likely that through the raids, Israel obtained further details of how the PFLP uses the Seven PFLP Proxies to raise funds, obtain other support and recruit new members.

The Seven PFLP Proxies operate across the United States with impunity, participating in events on college campuses and organizing protests in major American cities and worldwide that have on more than one occasion descended into violence.

Even though the activities of the Seven PFLP Proxies are well known, the United States has yet to designate the organizations as terrorist entities under relevant laws and regulations or, to our knowledge, commence investigations into the terror affiliations and activities of these groups.

Based on publicly available information on the Seven PFLP Proxies, the following is a summary of (i) testimony of members of the Seven PFLP Proxies and (ii) each entity’s connections to the PFLP. For more detailed information on these connections, please see <https://clarionproject.org/army-of-ngos/> and <https://www.ngo-monitor.org/reports/pflp-ties-six-newly-designated-terror-ngos/>.

### **Testimony of Members of the Seven PFLP Proxies Documenting That They Are Controlled by the PFLP**

The testimony of members of one of the Seven PFLP Proxies, and the resulting investigations, provided clear and convincing evidence that the Seven PFLP Proxies have been incorporated into the PFLP’s hierarchy and constitute an inseparable part of that designated foreign terrorist organization’s operational structure.

The publicly available sections of the Shin Bet report on the Seven PFLP Proxies provide explicit information on how the PFLP’s self-proclaimed civil society institutions employ fraud and forgery to divert donations that were intended to fund humanitarian operations and funnel them, instead, to support the PFLP’s terrorist activities. The Seven PFLP Proxies operate in coordination with each other and also act as a facially humanitarian network that is essential to the conduct of the PFLP’s core mission of engaging in terrorism.

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<sup>1</sup> Samidoun was designated as a terror organization in February 2021. <https://nbctf.mod.gov.il/en/Pages/SamidounEN.aspx>. UPWC, Addameer, Bisan, Al Haq, DCI-P and UAWC were each designated as a terror organization in October 2021. <https://nbctf.mod.gov.il/en/Pages/211021EN.aspx>.

<sup>2</sup> <https://www.state.gov/foreign-terrorist-organizations/>.

<sup>3</sup> <https://freebeacon.com/national-security/document-heres-why-israel-designated-six-palestinian-charities-terror-groups/>.

The Shin Bet's report also details how the heads of the Seven PFLP Proxies are senior PFLP operatives, as are numerous employees, who have directly engaged in terrorism.

The PFLP has built a financial system supported by an infrastructure of the Seven PFLP Proxies who raise money on various humanitarian pretexts while committing fraud and forgery of documents, thus directing money to the PFLP. According to the testimony of one informant, Said Abedat, "I worked in a variety of methods to fund PFLP activities through Lajan Al Amal Al Sahi (HWC), and we financed PFLP activities such as activities for universities, funding for the PFLP's sick and injured, funding for families of PFLP shahids (martyrs) and prisoners".<sup>4</sup> Like with the Holy Land Foundation, another "charitable" organization that the United States has prosecuted for similar violations of federal laws,<sup>5</sup> the Seven PFLP Proxies operate facially as humanitarian organizations, engaging in a modicum of lawful activities while focusing on providing unlawful financial and other support for their ultimate parent organization, the PFLP.

This infrastructure of humanitarian organizations maintains collaborations and knowledge transfers between the organizations on how to carry out the unlawful financial activity. In the words of Said Abedat and Amru Hamudeh's police testimony, who were simultaneously PFLP activists and HWC employees:

*"The [Seven PFLP Proxies] are interconnected and constitute a lifeline for the organization from an economic and organizational standpoint, that is, money laundering and funding of the PFLP's activities".<sup>6</sup>*

*"All of these committees, mentioned above, operate in full cooperation with one another and with PFLP senior operatives, and they meet one another many times. And all of these committees, mentioned above, affiliate to the PFLP and operate on behalf of the PFLP [...] The PFLP operates all the activities mentioned above for a number of goals:*

- *Employing workers that support the PFLP, and thus PFLP ideas are disseminated among the Palestinian people and PFLP supporters make a living from this work.*
- *External funding, through the operation of different centers like nurseries, a center for special needs. This way, the PFLP operates these centers and can easily receive funding and donations for these activities as well as for activities connected to the PFLP."<sup>7</sup>*

The Shin Bet report further documented that when the Seven PFLP Proxies solicit donations, claiming to be humanitarian organizations, they commit fraud and forge documents to increase the total donations while falsifying expenses and concealing that the money is being raised for the PFLP, unbeknownst to those donors, who believe they are donating to humanitarian organizations. The testimony of PFLP operatives Said Abedat, Amru Hamudeh, Saleh Muslemani and Adel Hadamy (who are each also affiliated with the Seven PFLP Proxies) makes this clear:

*"Under the PFLP's central committee, different branches operate, and they constitute key financial incomes for the PFLP, and they are the UAWC, the HWC, the Bisan Center, the UPWC, and Addameer [...] PFLP institutions are budgeted by donations and Palestinian businesses. The institutions launder money in order to increase their incomes and hide the funds that go out for external PFLP activities [...] After the arrival of funds to the central committee, this committee decides how and in what manner to divide the funds between the militant and organizational activities."<sup>8</sup>*

*"I printed the bank receipt from the internet, which had no logo or signature, and then Amru Hamudeh and I forged the bank signature, and I got a document with the bank logo from the bank, which we downloaded from the*

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<sup>4</sup> Said Abedat's police testimony held on April 7, 2021. Said Abedat is a PFLP activist and was HWC's accountant.

<sup>5</sup> <https://www.justice.gov/archive/ag/speeches/2004/72704ag.htm>.

<sup>6</sup> *Id.*

<sup>7</sup> Amru Hamudeh's police testimony held on April 2, 2021. Amru Hamudeh is PFLP activist and was HWC's purchasing department manager.

<sup>8</sup> Said Abedat's police testimony held on April 8, 2021.

internet, and print the bank receipt again with the bank logo and a forged signature, and send it to the specific donor.”<sup>9</sup>

“I assisted Tahrir Jaber (UPWC) and Raid Alsidi (Bisan Center) [...] and I taught them how to carry out forgery of documents and invoices for the purposes of money laundering [...] I presented inflated invoices to NGOs [...] I made up projects [...] and wrote a payment confirmation under a fictitious name.”<sup>10</sup>

“The vaccines that the HWC supplied to students, and the HWC’s vaccines were received for free from the Palestinian Authority. After about a year, the HWC presented to the Spanish donor forged documents [...] and we received funds from the vaccines in high amounts [...].”<sup>11</sup>

“As far as I know, this organization [referring to the Union of Agricultural Work Committees] affiliates to the PFLP, and it operates like the Health Work Committee by forging documents and invoices [...] They opened a big shop in Ramallah [...] And the person responsible for this project is Darem Arbid from Ramallah, in his 40s, and he is an accountant for the Union of Agricultural Work Committees, he is currently under arrest following the attack at Ein Bubin and is affiliated with PFLP [...] My estimation is that the Bisan printing company provides printing services to this association like it provides to the Health Work Committee, and also assists them in forging invoices.”<sup>12</sup>

We are inside every project. Buy real [...] and buy something that is not real. What is not real we inflate and give it to whoever is funding it so that they will pay the total, thus closing the debts of the committees. And this is how we manage all things. And everyone knows about it [...] if you buy something for 10,000NIS, you know that 6 of it is real and 4 is in favor of closing the debts.”<sup>13</sup>

“This is a forged invoice from the Al-Mahour L’Iatahadat Al-Ama company from 26.10.2008 in the amount of 119.480 dollars. Indeed, this company does construction, and it did a building project for the Al-Mazra’a Al-Shakira Al-Sahi company, which is affiliated with the HWC, however this invoice is forged [...] Said transferred me this document in order that I would write on this invoice.”<sup>14</sup>

The investigation adduced by the Shin Bet revealed that the Seven PFLP Proxies are managed by PFLP senior operatives, and that most of their employees are PFLP activists, as shown in the testimony of PFLP operatives Said Abedat, Amru Hamudeh and Huani Rashmawi Sanchez:

“All the managers in charge at the Health Work Committee are PFLP, for example, Walid Abu Ras [...] Naim Abu Tir [...], Ahmad Muslemani [...], and most of the employees are PFLP, and I’ve been working for the Health Work Committee since 1993, and it’s something known, that the Health Work Committee affiliates to the PFLP”<sup>15</sup>.

“The PFLP controls a number of different institutions in the West Bank, and the organization is built in a hierarchical manner. At the head of the organization are senior PFLP operatives, who decide on the activities and goals of the institutions. Today, at the head of the PFLP is Halda Jarar, [...] and the activists under are: Lajan Al Amal Al Sahi (Health Work Committee HWC) head by Walid Hanatsa; Lajant Al Marah (Union of Palestinian Women’s Committees UPWC) headed by Ha’tam Sa’afin; Bisan Center headed by A’atraf Al Rimo’I; Addameer headed by Haldah Jarar; Lajnat Al Amal Al Zara’ai (Union of Agricultural Work Committees UAWC) headed by Abed Al Razak Farange; and Al Bisan Company headed by Rami Fed’ai.”<sup>16</sup>

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<sup>9</sup> Said Abedat’s police testimony held on April 11, 2021.

<sup>10</sup> *Id.*

<sup>11</sup> Said Abedat’s police testimony held on April 6, 2021.

<sup>12</sup> *Id.*

<sup>13</sup> Police testimony recorded meeting between Amru Hamudeh and two PFLP members, Saleh Muslemani and Adel Hadamy, held on August 6, 2019.

<sup>14</sup> Amru Hamudeh’s police testimony held on April 2, 2021.

<sup>15</sup> Huani Rashmawi Sanchez’s police testimony held on April 13, 2021. Huani Rashmawi Sanchez is a PFLP activist.

<sup>16</sup> Amru Hamudeh’s police testimony held on April 2, 2021.

“Most of the employees at these institutions [Bisan Center, Addameer, HWC, UPWC] are PFLP operatives [...] All of these institutions are managed by senior PFLP operatives, and an example of this is Haldah Al-Jarar [...], and Bashir Al Hariri and Zacharia Al Nachas.”<sup>17</sup>

“This is an institution [Al-Haq] that affiliates to the PFLP and anyone who is not a PFLP operative is prohibited from working there [...] Yunis Mustafa and Mohamed Adzamer Al-Ra’ai are PFLP operatives who work at the Al-Haq institution.”<sup>18</sup>

“There is another association called Al-Haraq Al-Alami LiDfa’a an Al’Atfal (Defense for Children International) DCI. This association works on behalf of the PFLP and most of its employees are PFLP operatives.”<sup>19</sup>

### Connections Between the PFLP and Each of the Seven PFLP Proxies

While the excerpts from the Shin Bet report above make it clear that the PFLP controls the management and operations of the Seven PFLP Proxies and uses those entities to engage in fraudulent financial activity on behalf of the PFLP, the following explains the organizational structure and affiliations of the Seven PFLP Proxies.

#### Samidoun

Samidoun, which claims to be a network in support of Palestinian prisoners,<sup>20</sup> was founded by PFLP operatives in 2012. Its members have been involved in “establishing militant cells and motivating terrorist activity in Judea & Samaria and abroad,” and that Samidoun “plays a leading and significant role in the PFLP’s anti-Israel propaganda efforts, fundraising, and recruiting activists....”<sup>21</sup> Samidoun is one of the most active promoters of BDS in the United States.

Samidoun is led by Khaled Barakat, Mohammed Khatib and Mustapha Awa, top officials of the PFLP, and conducts its activities in coordination and cooperation with the PFLP.<sup>22</sup>

Samidoun events frequently include keynote speeches by PFLP terrorists and include PFLP flags on display.<sup>23</sup> For example, a 2017 event in New York celebrating the 50<sup>th</sup> anniversary of the PFLP<sup>24</sup> featured a speech by convicted airplane hijacker and PFLP terrorist, Leila Khaled.<sup>25</sup> Samidoun has participated in delegations to Lebanon where they met with senior PFLP leaders.<sup>26</sup> Samidoun also produced a documentary *Fedayin. The Fight of Georges Abdallah*<sup>27</sup> (a convicted PFLP terrorist) that is promoted by Samidoun chapters around the world to bring new

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<sup>17</sup> Said Abedat’s police testimony held on April 7, 2021.

<sup>18</sup> Said Abedat’s police testimony held on April 12, 2021.

<sup>19</sup> *Id.*

<sup>20</sup> <https://samidoun.net/about-samidoun/>.

<sup>21</sup> <https://nbctf.mod.gov.il/en/Pages/SamidounEN.aspx>.

<sup>22</sup> The 2018 Letter contained a detailed description of the history and controlling personnel of Samidoun. See the 2018 Letter starting at page 15 thereof (“Samidoun: The Facilitator between the Domestic Terror Affiliates, the BDS Movement and the PFLP”). <https://zachorlegal.org/wp-content/uploads/2018/11/Final-DOJ-Letter.pdf?189db0&189db0>.

<sup>23</sup> <https://samidoun.net/2017/11/london-protest-outside-balfour100-celebration-rings-out-with-demands-for-justice-for-palestine/>.

<sup>24</sup> <https://samidoun.net/2017/12/new-york-event-marks-50th-anniversary-of-the-pflp-and-the-palestinian-revolutionary-left/>.

<sup>25</sup> <https://www.adl.org/blog/leila-khaled-in-her-own-words>.

<sup>26</sup> <https://samidoun.net/2021/07/samidoun-delegation-to-lebanon-day-3-generations-of-struggle-for-return-and-liberation/>.

<sup>27</sup> Georges Ibrahim Abdallah is a PFLP operative who is imprisoned in France for his involvement in the murders of US military attaché Charles Ray and Israeli diplomat Yakov Barsimentov.

members and allies to PFLP.<sup>28</sup> While money is certainly the lifeblood of terror organizations, non-financial support, such as recruiting supporters and whitewashing the terror activities of the PFLP, is critical to the expansion of the PFLP in the United States, especially on college campuses. Samidoun's activities in the United States are a direct lifeline in support of the PFLP's international terror activities.

It is common for violence against Jewish Americans to result from Samidoun's activities in the United States. For example, Nerdeen Kiswani, a Samidoun activist, threatened a man wearing a sweatshirt identifying him as a supporter of Israel, telling him: "I hate your shirt. I'ma set it on fire. I'm serious."<sup>29</sup> On April 20, 2022, an American Jew was assaulted at a rally co-sponsored by Samidoun and attended by its activists in NYC. The incident is currently under investigation by the NYPD.<sup>30</sup> In another incident, Samidoun activists violently attacked American Jews on May 18, 2021, outside the Israeli Consulate in NY. News reports of the Samidoun violence stated that "multiple arrests were made...as protesters clashed with police and pro-Israel demonstrators..."<sup>31</sup> All of these activities are meant to spread the same type of terror in the United States as the PFLP spreads in the Middle East.

In addition to the institutional ties between Samidoun and the PFLP, there are numerous individual ties between Samidoun officials and terrorists. Joe Catron, the United States coordinator for Samidoun who uploaded a picture of himself with convicted PFLP terrorist and airplane hijacker Leila Khaled,<sup>32</sup> tweeted a message to Hezbollah leader Hassan Nasrallah, reading: "Nasrallah my friend, attack, attack Tel Aviv."<sup>33</sup> During a protest promoting violence against Jews, Samidoun protestors broke into chants of "death to America" and "death to Israel" in 2020<sup>34</sup> and on multiple<sup>35</sup> other occasions<sup>36</sup> Samidoun expressed support<sup>37</sup> for "globalizing the intifada," which refers to a spate of widespread Palestinian violence that resulted in the deaths of approximately 1,000 Jews worldwide.<sup>38</sup>

Due to Samidoun's terror connections and in compliance with United States laws relating to funding terror organizations, Mastercard, Visa, American Express,<sup>39</sup> PayPal, Donorbox and Plaid<sup>40</sup> prohibited Samidoun from using their services.

### **Addameer**

Addameer functions as the legal advocacy arm of the PFLP, working to secure the release of PFLP operatives when they are taken into custody in connection with terror investigations. Fatah, the political party founded by the innovator of modern terrorism, Yasir Arafat, has acknowledged that Addameer is an affiliate of the PFLP.<sup>41</sup> Addameer promotes BDS.

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<sup>28</sup><https://www.facebook.com/BDSFMontpellier/photos/a.728004077272698/6993555640717479/> and <https://www.facebook.com/fedayinlefilm/photos/a.128857905271601/472619360895452/>.

<sup>29</sup> <https://www.stopantisemitism.org/antisemite-of-the-week-3/antisemite-of-the-week-nerdeen-kiswani-schoolyard-bigot>.

<sup>30</sup> <https://www.jpost.com/bds-threat/article-704957>.

<sup>31</sup> <https://www.dailymail.co.uk/news/article-9594101/Violence-breaks-pro-Palestine-protesters-NYPD-outside-Israeli-consulate-NYC.html>.

<sup>32</sup> <https://www.facebook.com/jncatron/photos/a.344726739046178/344726745712844/?type=3&theater>.

<sup>33</sup> [https://twitter.com/jncatron/status/560384786200813568?ref\\_](https://twitter.com/jncatron/status/560384786200813568?ref_). Like the PFLP, Hezbollah has been designated as a foreign terror organization by the United States since 1997. <https://www.state.gov/foreign-terrorist-organizations/>.

<sup>34</sup> <https://dailycaller.com/2020/09/23/day-of-rage-resistance-palestine-israel/>.

<sup>35</sup> <https://samidoun.net/2021/09/12-september-nyc-globalize-the-intifada-from-attica-to-gilboa/>.

<sup>36</sup> <https://www.memri.org/reports/samidoun-palestinian-prisoner-solidarity-network-rallies-ny-and-canada-calls-intifada>.

<sup>37</sup> <https://samidoun.net/2022/04/new-york-city-marches-for-palestine-on-land-day-calls-to-defundracism/>.

<sup>38</sup> <https://www.adl.org/resources/glossary-terms/the-second-intifada-2000>.

<sup>39</sup> <https://www.jpost.com/israel-news/mastercard-visa-amex-all-pull-option-to-fund-terror-group-linked-ngo-613277>.

<sup>40</sup> <https://www.jns.org/international-funding-platforms-are-severing-ties-with-bds-affiliated-organizations/>.

<sup>41</sup> [https://web.archive.org/web/20150924010641/http://www.fatehorg.ps/index.php?action=show\\_page&ID=11455&lang=ar](https://web.archive.org/web/20150924010641/http://www.fatehorg.ps/index.php?action=show_page&ID=11455&lang=ar).

By way of example of Addameer's activities in support of terror suspects, Salah Hamouri is a lawyer who worked for Addameer. In 2005 Hamouri was arrested and convicted<sup>42</sup> of plotting to assassinate former Israeli Chief Rabbi Ovadia Yosef.<sup>43</sup> He was once again arrested by Israel in March 2022 over alleged links to the PFLP.<sup>44</sup>

This, and the close affiliation of Addameer to the PFLP, were detailed in a recent report, linked to in the footnote below, that should be read in its entirety.<sup>45</sup>

### **Al Haq**

Al Haq is an organization that claims to monitor human rights abuses in Israel and the territories controlled by the Palestinian Authority, yet it is a prominent promoter of BDS activity and has deep ties to the terror organizations that are at the heart of violence directed at Jews. Al Haq's General Director, Shawan Jabarin, was convicted in 1985 for recruiting and arranging training for members for the PFLP.<sup>46</sup> In 2008, the Israeli Supreme Court noted that Jabarin is "among the senior activists of the Popular Front terrorist organization."<sup>47</sup> Several other Al Haq employees simultaneously hold positions in the PFLP. For example, Ali Jaradat<sup>48</sup>, an Al Haq field researcher, was the editor-in-chief of the PFLP's official magazine. A comprehensive analysis of the extensive interlocks between Al Haq and PFLP can be found at [https://www.ngo-monitor.org/ngos/al\\_haq/](https://www.ngo-monitor.org/ngos/al_haq/).

### **DCI-P**

DCI-P claims to be a children's rights organization.<sup>49</sup> In fact, DCI-P is a promoter of BDS and has a long history of affiliating with terror groups and spreading misinformation in support of such groups.<sup>50</sup>

Like the other Seven PFLP Proxies, DCI-P has extensive interlocks with the PFLP's leadership and operational command. A leader of DCI-P, Nassar Ibrahim,<sup>51</sup> acted as the editor of the PFLP's El Hadaf magazine.<sup>52</sup> Another DCI-P executive, Hashem Abu Maria,<sup>53</sup> was hailed by the PFLP as a "leader" upon his death during a clash with the Israeli military.<sup>54</sup> In addition to acting as Al Haq's General Director, Shawan Jabarin served on DCI-P's board from at least 2005<sup>55</sup> through 2009.<sup>56</sup>

### **UAWC**

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<sup>42</sup> <https://www.timesofisrael.com/israel-frees-french-palestinian-after-13-months-without-trial/>.

<sup>43</sup> <https://www.ynet.co.il/articles/0,7340,L-4161873,00.html>.

<sup>44</sup> <https://www.timesofisrael.com/french-palestinian-lawyer-jailed-again-by-israel-over-alleged-terror-links/>.

<sup>45</sup> [https://www.gov.il/BlobFolder/generalpage/blood\\_money/en/strategic\\_affairs\\_bloodM.pdf](https://www.gov.il/BlobFolder/generalpage/blood_money/en/strategic_affairs_bloodM.pdf).

<sup>46</sup> <https://web.archive.org/web/20090129205347/http://domino.un.org/unispal.nsf/85255db800470aa485255d8b004e349a/4f4e2d2311ab624485256c53006afa92!OpenDocument>.

<sup>47</sup> <https://www.ngo-monitor.org/nm/wp-content/uploads/2018/10/Jabarin-July-2008.pdf>.

<sup>48</sup> <http://www.muwatin.birzeit.edu/en/profile/Ali-Jaradat>.

<sup>49</sup> [https://www.dci-palestine.org/who\\_we\\_are](https://www.dci-palestine.org/who_we_are).

<sup>50</sup> <https://www.ngo-monitor.org/reports/defense-for-children-international-palestines-ties-to-the-pflp-terrorist-organization-2/>.

<sup>51</sup> <https://tinyurl.com/2nss4742>.

<sup>52</sup> <https://web.archive.org/web/20180623193035/https://vision-pd.org/AR/PersonalCards/Nassar-Ibrahim>.

<sup>53</sup> [https://www.dci-palestine.org/dci\\_palestine\\_mourns\\_the\\_loss\\_of\\_hashem\\_abu\\_maria\\_colleague\\_and\\_friend\\_killed\\_by\\_israeli\\_force](https://www.dci-palestine.org/dci_palestine_mourns_the_loss_of_hashem_abu_maria_colleague_and_friend_killed_by_israeli_force).

<sup>54</sup> <https://web.archive.org/web/20191107085311/https://english.pflp.ps/2014/08/03/pflp-mourns-comrade-hashem-abu-maria-murdered-by-occupation-forces/>.

<sup>55</sup> <https://d3n8a8pro7vhmx.cloudfront.net/dcipalestine/pages/379/attachments/original/1422470576/report2005.pdf?1422470576>.

<sup>56</sup> <https://web.archive.org/web/20140906184508/http://www.dci-pal.org/english/display.cfm?DocId=698&CategoryId=16>.

UAWC claims to support the civil rights of those involved in agriculture and other food production. Like the other entities discussed herein, UAWC is, in fact, a part of the non-governmental organization façade that promotes BDS on behalf of the Designated Terror Organizations.<sup>57</sup>

According to Fatah’s website, UAWC is an affiliate of the PFLP<sup>58</sup> and a 1993 USAID-engaged audit labels it the “agricultural arm” of the PFLP.<sup>59</sup>

Samer Arbid worked as UAWC’s financial director<sup>60</sup> at the time of his arrest for allegedly commanding a PFLP terror cell that carried out a bombing against Israeli civilians,<sup>61</sup> murdering 17-year-old Rina Shnerb. According to his indictment, Arbid prepared and detonated the explosive device that killed Shnerb. A December 2019 article in the Jerusalem Post notes that according to the Israeli Security Service, “Arbid prepared the explosive device and detonated it when he saw the Shnerb family approaching....”<sup>62</sup> Arbid also served as Addameer’s accountant until April 2017.<sup>63</sup>

Another UAWC finance executive, Abdul Razeq Farraj<sup>64</sup> was arrested in 2019 for his leadership role in the terror attack that killed Rena Schnerb.<sup>65</sup>

Yet another UAWC leader, former UAWC Board of Directors member Ismat al-Shuli, was in prison for seven years<sup>66</sup>, beginning in 1975, for “belonging to the Popular Front for the Liberation of Palestine.” A December 2017 article in Palestinian media referred to al-Shuli as a “PFLP leader.”<sup>67</sup>

## UPWC

UPWC claims to be a women’s rights organization and UPWC was identified by a USAID-engaged audit as the PFLP’s “women’s organization.”<sup>68</sup> according to Fatah, UPWC is an affiliate of the PFLP.<sup>69</sup> UPWC is staffed and managed by PFLP operatives and promotes BDS.<sup>70</sup>

As of 2020, Suhair Khader was UPWC’s Vice President<sup>71</sup> and a “member of the PFLP Central Committee.”<sup>72</sup> In 2018, Khader stated that UPWC is the PFLP’s “feminist framework.”<sup>73</sup>

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<sup>57</sup> [https://www.ngo-monitor.org/ngos/union\\_of\\_agricultural\\_work\\_committees\\_uawc/](https://www.ngo-monitor.org/ngos/union_of_agricultural_work_committees_uawc/).

<sup>58</sup>

[https://web.archive.org/web/20150924010641/http://www.fatehorg.ps/index.php?action=show\\_page&ID=11455&lang=ar](https://web.archive.org/web/20150924010641/http://www.fatehorg.ps/index.php?action=show_page&ID=11455&lang=ar)

<sup>59</sup> [https://pdf.usaid.gov/pdf\\_docs/PNABY769.pdf](https://pdf.usaid.gov/pdf_docs/PNABY769.pdf).

<sup>60</sup> [https://www.linkedin.com/posts/experts-solidaires-84b0794b\\_communication-de-luawc-concernant-larrestation-activity-6585576884652789760-fcGZ/](https://www.linkedin.com/posts/experts-solidaires-84b0794b_communication-de-luawc-concernant-larrestation-activity-6585576884652789760-fcGZ/).

<sup>61</sup> <https://www.timesofisrael.com/west-bank-terror-bombing-suspect-in-critical-condition-after-interrogation/>.

<sup>62</sup> <https://www.jpost.com/Israel-News/Shin-Bet-arrests-50-PFLP-terrorists-thwart-upcoming-attack-611289>.

<sup>63</sup> <https://web.archive.org/web/20170414233539/http://www.addameer.org/about/our-staff>.

<sup>64</sup> <https://www.addameer.org/prisoner/abdul-razeq-farraj-0>.

<sup>65</sup> <https://tinyurl.com/4rm7tpy>.

<sup>66</sup> <http://www.asdaapress.com/?ID=8980>.

<sup>67</sup> <https://tinyurl.com/jb3uuz6h>.

<sup>68</sup> [https://pdf.usaid.gov/pdf\\_docs/PNABY769.pdf](https://pdf.usaid.gov/pdf_docs/PNABY769.pdf).

<sup>69</sup> [https://web.archive.org/web/20150924010641/http://www.fatehorg.ps/index.php?action=show\\_page&ID=11455&lang=ar](https://web.archive.org/web/20150924010641/http://www.fatehorg.ps/index.php?action=show_page&ID=11455&lang=ar).

<sup>70</sup> <https://www.ngo-monitor.org/reports/the-union-of-palestinian-women-committees-societys-ties-to-the-pflp-terror-group/>.

<sup>71</sup> <https://web.archive.org/web/20180503063233/http://upwc.ps/news450a12.html>.

<sup>72</sup> <https://tinyurl.com/nzmy74bk>.

<sup>73</sup> <https://web.archive.org/web/20180503063233/http://upwc.ps/news450a12.html>.



Samira Abdel-Alim is the head of Rafah area and board member of UPWC<sup>74</sup>, and was identified by the PFLP as a member of its central committee.<sup>75</sup>

Iktimal Hamad, the leader of UPWC<sup>76</sup> as of September 2021, was described by the Palestinian Ma'an News Agency as a member of the PFLP Central Committee.<sup>77</sup>

### **Bisan**

Bisan describes itself as “a non- governmental, nonprofit, democratic and progressive Palestinian CSO that seeks to enhance Palestinians’ resilience in order to contribute in building a Palestinian civil, democratic, effective and active community.”<sup>78</sup> As with the other Seven PFLP Proxies, Bisan’s leadership is populated by PFLP operatives and it is a BDS promoter.<sup>79</sup>

The Executive Director of Bisan, Ubai Aboudi, was arrested and sentenced to 12 months in prison for his membership in the PFLP, where he was found to be “recruiting activists to the [PFLP] and strengthening its infrastructure.”<sup>80</sup> Itiraf Hajaj (Rimawi), Bisan’s previous Executive Director, was arrested<sup>81</sup> in 2019 and sentenced to 42 months in prison. A statement by Israeli authorities refers to him as responsible for PFLP clandestine operations.<sup>82</sup>

### **Conclusion**

The investigation that led to the designation of the Seven PFLP Proxies as terrorist organizations shows that PFLP established a network of proxy institutions that operate under the guise of civilian-humanitarian organizations. These institutions, claiming to be civil society organizations, present themselves as working towards humanitarian goals, yet they act under PFLP leadership and in accordance with that organization’s directives to fund and promote terror activities. The Seven PFLP Proxies constitute a critical part of the PFLP’s existence, particularly in strengthening and building power.

While some foreign governments and others have decried the designation of the Seven PFLP Proxies as terror organizations, and further objected to Israel’s raids, a review of the information presented herein demonstrates that notwithstanding the claims of being humanitarian civil society organizations, the Seven PFLP Proxies operate to advance the goals of, and are controlled by, the PFLP. Further investigation by the DOJ is needed to examine the activities of these terror affiliates in the United States.

The Seven PFLP Proxies operate directly and indirectly in the United States, raising funds (in a manner that likely constitutes money laundering, wire fraud and other federal offenses) and providing other material support for designated foreign terror organizations that engage in violent attacks against Americans, both domestically and abroad. As we noted in our 2018 Letter, BDS organizations, including the Seven PFLP Proxies, likely constitute a criminal enterprise operating in violation of 18 USC § 1961, *et seq.*

As with many other terror organizations of late, the Seven PFLP Proxies specialize in stochastic terrorism through the BDS apparatus, where the vilification of Jews and methodologies for promoting attacks on Jews is introduced and promoted. The primary focus for this violence is the American Jewish community, already under

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<sup>74</sup> <https://www.ngo-monitor.org/pflp-terror-group-leader-addresses-an-eu-funded-workshop/>.

<sup>75</sup> <https://tinyurl.com/yrwxd9nr>.

<sup>76</sup> <https://web.archive.org/web/20211004063715/https://upwc.ps/?p=3132>.

<sup>77</sup> <https://www.maannews.net/news/2048726.html>.

<sup>78</sup> <http://www.bisan.org/about-bisan/>.

<sup>79</sup> <https://www.ngo-monitor.org/ngos/bisan-research-development-center/>.

<sup>80</sup> <https://www.ngo-monitor.org/reports/summary-pflps-ngo-network/>.

<sup>81</sup> [https://english.wafa.ps/page.aspx?id=pbD98Fa113546036406apbD98F&\\_cf\\_chl\\_jschl\\_tk\\_=f134d7531ce91fa8f3ebbd5ae449e0d1a24f3743-1577096785-0-](https://english.wafa.ps/page.aspx?id=pbD98Fa113546036406apbD98F&_cf_chl_jschl_tk_=f134d7531ce91fa8f3ebbd5ae449e0d1a24f3743-1577096785-0-).

<sup>82</sup> <https://tinyurl.com/4rm7tpry>.

withering attack by BDS supporters at a time when antisemitism is at epidemic levels in the United States and around the world.

We urge the DOJ to investigate the activities of the Seven PFLP Proxies and hold them accountable for their promotion and support of terrorism. We would be happy to provide you with further documentation on the matters disclosed herein.

On behalf of Zachor Legal Institute,

Marc Greendorfer  
President

CC: Senator Chuck Grassley, Ranking Member, Senate Committee on the Judiciary  
Senator Steve Daines  
Senator Jon Tester  
Representative Matt Rosendale