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ALERTS AND TYPOLOGIES in the context of the terrorist attacks by Hamas and Palestinian Islamic Jihad (PIJ) on Israel on October 7, 2023

Terrorist financing campaigns are often conducted under the guise of fundraising campaigns for humanitarian aid and led by various associations, charitable organizations or through private initiatives.² This document shall provide a typology with indicators, that may lead to such a suspicion of financing terrorist attacks. Such fundraising can take several forms, including:

- Organizations related to terrorist activities conduct campaigns across multiple channels, such as media outlets, crowdfunding sites, instant messaging applications, and various social media networks, while employing a variety of channels and venues for transferring money, including bank and electronic transfers, credit cards, advanced payment means and cryptocurrency (such as BTC, ETH, USDT, USDC and TRX).

Terrorist financing campaigns can be disguised on portals promoting humanitarian aid, but in fact raising funds for terrorist attacks.

² Risk of terrorist abuse in non-profit organisations (fatf-gafi.org)

Possible Indicators:

The following indicators are intended to support professionals in detecting suspicions of terrorist financing):

- Crypto addresses, bank accounts, digital payment means etc. published on social media platforms or having links to such platforms.
- Use of phrases and numbers in the transfer of funds, where there is an indication that they are related to terrorism in general or in the context of current events. For example, money transfers to organizations whose names indicate a link to organizations whose names indicate a link to terrorism such as the name of a famous martyr or a word such as "Jihad" or a stated purpose to assist the fighting in Gaza.
- Unusual activity carried out by family members or by entities related to those organizations.
- Opening an account, immediately after engaging in extensive financial activity for humanitarian purposes.
- Payments made through a website with the initial appearance of legitimacy but closer examination reveals indications of connections to organizations related to terrorist activities.
- An address given by the NPO or its affiliates, which belongs to or is used by organizations suspected of terrorist activities.
- Entities connected to an NPO who were previously or are currently connected to terrorist activity or terrorist financing.
- NPOs making bank transfers to other NPOs known to be involved in terrorist financing.
- A request to transfer funds to organizations related to terrorist activities or a request to transfer funds to an entity or organization that is linked to those organizations.
- Evidence that NPO donors, partners, suppliers or beneficiaries are involved themselves or are related to entities involved in terrorist activity.

Please note that this list of indicators is not exhaustive.

Furthermore, we would like to underline the importance of Article 9 para 1 AMLA which says, that a financial intermediary must immediately file a report with MROS if it knows, or has reasonable grounds to suspect that assets involved in the business relationship are subject to the power of disposal of a criminal or terrorist organization, or serve the financing of terrorism.³

³ [SR 955.0 - Federal Act of 10 October 1997 on Combating Money Laundering and Terrorist Financing in the Financial Sector \(Anti-Money Laundering Act, AMLA\) \(admin.ch\)](#)