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U.S. Government AML/CFT Regulatory, Policy, and Legislative Developments 2017-2025

Year	Action	Agency	Resources
2017	Countering America's Adversaries Through Sanctions Act	Congress	Sanctions Bill Includes Counter-Terrorism Financing, Financial Access Language
2017	DOJ Letter Ending Operation Chokepoint	Department of Justice Office of the Assistant Attorney General	Controversial "Operation Choke Point" Program Has Ended
2017	Treasury Issues Final New Rules on Reliance Standards for Making Good Faith Determinations	Department of Treasury Internal Revenue Service	Proposed IRS Rule Could Make International Grantmaking Easier
2018	National Terrorist Financing Risk Assessment	Department of Treasury	Treasury Updates National Terrorist Financing Risk Assessment, Finding Measures to Protect Charities Largely Effective
2019	Joint Statement on Risk-Focused Bank Secrecy Act/Anti-Money Laundering Supervision	Board of Governors of the Federal Reserve System Federal Deposit Insurance Corporation	

		Financial Crimes Enforcement Network National Credit Union Administration Office of the Comptroller of the Currency	
2019	<u>Corporate Transparency Act of 2019</u>	Congress	<u>Celebrating the Passage of the Corporate Transparency Act</u>
2019	<u>Caesar Syria Civilian Protection Act of 2019</u>	Congress	<u>The US' Caesar Act and Humanitarian Action in Syria</u>
2020	<u>Anti-Money Laundering Act of 2020</u>	Congress	<u>Congress Passes AML Act of 2020 - Charity & Security Network</u>
2020	<u>Advanced Notice of Proposed Rule-Making: Anti-Money Laundering Program Effectiveness</u>	Department of Treasury Financial Crimes Enforcement Network	<u>C&SN Advanced Notice of Proposed Rulemaking comment submission: opportunity to address financial access for non-profits</u>
2020	<u>Joint Fact Sheet on Bank Secrecy Act Due Diligence Requirements for Charities and Non-Profit Organizations</u>	Board of Governors of the Federal Reserve System Federal Deposit Insurance Corporation Financial Crimes Enforcement Network National Credit Union Administration Office of the Comptroller of the Currency	<u>Letter to Treasury: Joint Fact Sheet on Bank Secrecy Act Due Diligence Requirements for Charities and Non-Profit Organizations</u>

2020	<u>Blocking Property of Certain Persons Associated With the International Criminal Court</u>	Office of the President	
2020	<u>Sanctions on International Criminal Court Prosecutor and Office of the Prosecutor</u>	Department of State	<p><u>ICC prosecutor slams ‘wholly unacceptable’ US sanctions</u></p> <p><u>US Sanctions International Criminal Court Prosecutor</u></p> <p><u>US imposes sanctions on top international criminal court officials</u></p>
2021	<u>Ending Sanctions and Visa Restrictions against Personnel of the International Criminal Court</u>	Department of State	<p><u>IBA welcomes removal of sanctions on ICC Prosecutor and senior official</u></p> <p><u>Factsheet: U.S. Sanctions on the International Criminal Court</u></p>
2021	<u>U.S. Strategy on Countering Corruption</u>	Office of the President	
2021	<u>The Treasury 2021 Sanctions Review</u>	Department of Treasury	<p><u>Sanctions Review Fails to Review Sanctions – Congress Should Step In</u></p> <p><u>Biden’s Sanctions Policy Fails to Deliver: No Concrete Policy Solutions to the Many Harmful Impacts of Sanctions</u></p> <p><u>46 Organizations Call on the Administration to Implement Structural Changes to U.S. Sanctions Policy</u></p>

2021	[Foreign Terrorist Organization] Designation of Ansarallah in Yemen - Issuance of Counter Terrorism General Licenses and related FAQs; Counter Terrorism Designations; Venezuela-related Designations; CAATSA - Russia-related Designations; Yemen-related Designations Updates (Yemen)	Department of State	United States' Designation of Houthi Militia as Foreign Terrorist Organization Risks Expediting Large-Scale Famine in Yemen, Speakers Warn Security Council Aid agencies make unprecedented and united call for Biden administration to revoke Ansar Allah terrorist designation
2021	In the Matter of the Revocation of the Designation of Ansarallah (and Other Aliases) as a Foreign Terrorist Organization (Yemen)	Department of State	Biden Administration Revokes Terrorist Designation of Houthis Biden will reverse Trump's decision to label Yemen's Houthis as terrorists
2021	Bank Secrecy Act/Anti-Money Laundering Examination Manual Update - Charities and Nonprofit Organizations	Federal Financial Institutions Examination Council (FFIEC)	Federal Bank Examination Manual Chapter on Nonprofit Customers Updated to Reflect a Risk-Based Approach
2022	Fact Sheet: Provision of Humanitarian Assistance to Afghanistan and Support for the Afghan People	Department of Treasury Office of Foreign Assets Control	
2022	National Strategy for Combating Terrorist and Other Illicit Financing	Department of Treasury	Unpacking Treasury's 2022 National Strategy for Combating Terrorist and Other Illicit Financing - Charity & Security Network

			<u>Letter to Under Secretary Brian Nelson: NTFRA (C&SN 2022)</u>
2022	<u>United Nations Security Council Resolution 2664</u>	United Nations Security Council	<p><u>Charity & Security Network Applauds Landmark UN Security Council Resolution on Sanctions, Urges U.S. Government to Follow Suit</u></p> <p><u>Safeguarding Humanitarian Action in UN Sanctions and Counter terrorism Regimes: The Impact and Implementation of Resolution 2664</u></p> <p><u>Safeguarding Humanitarian Action from the Unintended Effects of Sanctions: Resolution 2664 and the 1267 ISIL/al-Qaida Regime</u></p> <p><u>The Limits of UN Security Council Resolution 2664</u></p> <p><u>A Study on the Impacts of UN Security Council Resolution 2664 on Financial Institutions & Donors</u></p>
2022	<u>Treasury Implements Historic Humanitarian Sanctions Exceptions</u>	Department of Treasury Office of Foreign Assets Control	<u>Charity & Security Network Applauds US Plans to Significantly Expand Protections for Life-saving Aid</u>
2022	<u>Publication of Humanitarian-related Regulatory Amendments and Associated Frequently Asked Questions</u>	Department of Treasury Office of Foreign Assets Control	<u>New OFAC Licenses Facilitate Humanitarian Transfers</u>

2022	<u>Federal Register: Addition of General Licenses to OFAC Sanctions</u> <u>Regulations for Certain Transactions of Nongovernmental Organizations and Related to Agricultural Commodities, Medicine, Medical</u>	Department of Treasury Office of Foreign Assets Control	<u>When the Giving Gets Tough: Navigating Risk in Sanctioned Locations</u>
2022	<u>FinCen Issues Notice of Proposed Rulemaking Regarding Access to Beneficial Ownership Information and Related Safeguards</u>	Department of Treasury Financial Crimes Enforcement Network	
2023	<u>Supplemental Guidance for the Provision of Humanitarian Assistance</u>	Department of Treasury Office of Foreign Assets Control	<u>Understanding OFAC's 2023 Supplemental Guidance for the Provision of Humanitarian Assistance Under the New & Amended Dec. 2022 General Licenses</u>
2023	<u>Compliance Communiqué: Guidance for the Provision of Humanitarian Assistance to Syria</u>	Department of Treasury Office of Foreign Assets Control	<u>OFAC Issues Sanctions Compliance Guidance for Humanitarian Assistance to Syria</u> <u>United States: OFAC issues sanctions compliance guidance for humanitarian assistance to Syria</u>
2023	<u>Compliance Communiqué: Guidance for the Provision of Humanitarian Assistance to the Palestinian People</u>	Department of Treasury Office of Foreign Assets Control	<u>OFAC Issues Compliance Communiqué: Guidance for the Provision of Humanitarian Assistance to the Palestinian People</u> <u>OFAC Issues Guidance for Humanitarian Assistance to the Palestinian People</u>

2023	<u>The Department of Treasury's Derisking Strategy</u>	Department of Treasury	<u>This Week in AML: Treasury's 2023 De-risking Strategy</u>
2023	<u>H.R.6408 - To amend the Internal Revenue Code of 1986 to terminate the tax-exempt status of terrorist supporting organizations</u>	Congress	<u>Charity & Security Network Opposes Legislation that Targets Charities</u>
2024	<u>Counter Terrorism Designation; Issuance of Counter Terrorism General License; Sanctions Compliance Guidance for the Provision of Humanitarian-Related Assistance and Critical Commodities to the Yemeni People</u>	Department of Treasury Office of Foreign Assets Control	<u>OFAC Issues Guidance for the Provision of Humanitarian Assistance and Critical Commodities to the Yemeni People</u>
2024	<u>2024 National Strategy for Combating Terrorist and Other Illicit Financing</u>	Department of Treasury	<u>Unpacking Treasury's 2024 National Terrorist Financing Risk Assessment</u>
2024	<u>United Nations Security Council Resolution 2761</u>	United Nations Security Council	<u>An Indefinite Humanitarian Carve-out for the ISIL/al-Qaida UN Sanctions Regime: What it Means and What Comes Next</u> <u>UN Security Council Adopts Standing Application for Humanitarian Carve-out Applied to ISIL/al-Qaida UN Sanctions Regime</u>
2024	<u>H.R. 9495- Stop Terror Financing and Tax Penalties on American Hostages Act</u>	Congress	<u>Civil Society Letter to House Opposing H.R. 9495</u>

			<u>Updated: New House Bill Repeats Language with Dangerous Implications for Charities</u>
2024	<u>FinCEN Issues Proposed Rule to Strengthen and Modernize Financial Institutions' AML/CFT Programs</u>	Department of Treasury Financial Crimes Enforcement Network	<u>C&SN Submits Input to FinCEN's Notice of Proposed Rulemaking for AML/CFT Programs</u>
2024	<u>FinCEN Fact Sheet: Proposed Rule to Strengthen and Modernize Financial Institution AML/CFT Programs</u>	Department of Treasury Financial Crimes Enforcement Network	
2024	<u>Federal Register: Proposed Rule on Anti-Money Laundering and Countering the Financing of Terrorism Programs</u>	Federal Register Department of Treasury Financial Crimes Enforcement Network	
2025	<u>Imposing Sanctions on the International Criminal Court</u>	Office of the White House (February)	<u>Strong Pushback Against U.S. Sanctions on the International Criminal Court at UN Human Rights Council</u> <u>Questions and Answers: U.S. Sanctions on the International Criminal Court</u>
2025	<u>Foreign Terrorist Organization Designations of Tren de Aragua, Mara Salvatrucha, Cartel de Sinaloa, Cartel de Jalisco Nueva Generacion, Carteles Unidos, Cartel del Noreste, Cartel del Golfo, and La Nueva Familia Michoacana (Mexico and Venezuela)</u>	Department of State (February)	<u>The Dangerous Sweep of Trump's Plans to Designate Cartels as Terrorist Organizations</u> <u>In boat strike, Trump repurposes 'war on terror' for Latin American crime</u> <u>Kaine Leads Pressure on Trump Administration for Answers on Strike in Caribbean</u>

2025	Fact Sheet: Designation of International Cartels	Department of State (February)	The Potential Policy Impacts of Classifying Cartels as FTOs
2025	OFAC Alert: International Cartels Designated as Foreign Terrorist Organizations and Specially Designated Global Terrorists (Mexico and Venezuela)	Department of Treasury Office of Foreign Assets Control (March)	OFAC Alert on Cartel Designations: Growing Risks to Nonprofits from the Expanded Use of Counter-Terrorism Frameworks via FTO Designations
2025	Treasury Department Announces Suspension of Enforcement of Corporate Transparency Act Against U.S. Citizens and Domestic Reporting Companies	Department of Treasury (March)	Senators, Law Enforcement, National Security, Small Businesses Voices Call on Treasury to Reinstate Beneficial Ownership Reporting
2025	Foreign Terrorist Organization Designation of Ansarallah (Yemen)	Department of State (March)	President Trump's Houthi Foreign Terrorist Organization Designation Will Exacerbate Yemen Humanitarian Crisis US Redesignates Ansarallah as a Foreign Terrorist Organization
2025	Justice Department Announces Launch of Joint Task Force October 7	Department of Justice (March)	C&SN: Call for Inputs on the Human Rights Impacts of Administrative Measures to Counter Terrorism and (Violent) Extremism Trump launches 'October 7 Joint Task Force', as war on Palestine protesters widens Justice Department, FBI launch task force to investigate Oct. 7 attack on Israel

2025	<u>Federal Register: Beneficial Ownership Information Reporting Requirement Revision and Deadline Extension</u>	Department of Treasury Financial Crimes Enforcement Network (March)	
2025	<u>Foreign Terrorist Organization Designations of Viv Ansanm and Gran Grif (Haiti)</u>	Department of State (May)	<p><u>Haiti: How US terrorist designations could deepen criminal rule and humanitarian tragedy</u></p> <p><u>Trump administration designates two Haitian gangs as 'terrorist groups'</u></p> <p><u>State Department labels Haitian gangs as terrorist organizations</u></p>
2025	<u>Providing Sanctions Relief for the Syrian People</u>	Department of State (May)	<p><u>Syria: US Lifting Sanctions Will Bolster Rights, Recovery for the Syrian People</u></p> <p><u>Trump's Announcement to Cease Sanctions in Syria Would Boost Humanitarian Aid & Recovery Efforts</u></p>
2025	<u>Syria General License 25</u>	Department of Treasury Office of Foreign Assets Control (May)	<u>OFAC Issues General License 25 and New Fact Sheet to Ease Sanctions on Syria</u>
2025	<u>Exception to Prohibition Imposed by Section 311 of the USA PATRIOT Act against the Commercial Bank of Syria</u>	Department of Treasury Financial Crimes Enforcement Network (May)	<u>U.S. and EU Take Steps Towards Easing Sanctions on Syria</u>

2025	Frequently Asked Questions (FAQs) for Syria General License 25	Department of Treasury Office of Foreign Assets Control (May)	OFAC issues Fact Sheet on FAQs related to Syria General License 25
2025	Imposing Sanctions in Response to the ICC's Illegitimate Actions Targeting the United States and Israel	Department of State (June)	US decision to sanction ICC judges 'deeply corrosive' to justice: UN rights chief When justice is targeted, victims' rights are at risk: Civil society condemns U.S. sanctions against ICC Judges
2025	Providing for the Revocation of Syria Sanctions	Office of the White House (June)	Updated: Trump Administration Issues Executive Order and Fact Sheet on Wholesale Revocation of Syria Sanctions UN experts welcome lifting of sanctions to rebuild Syria
2025	Fact Sheet: President Donald J. Trump Provides for the Revocation of Syria Sanctions	Office of the White House (June)	United States Terminates Syria Sanctions Program and Initiates Other Relief
2025	Frequently Asked Questions for Syria General License 25	Department of Treasury Office of Foreign Assets Control (June)	United States Lifts Comprehensive Syria Sanctions
2025	Revocation of the Foreign Terrorist Organization Designation of al-Nusrah Front, Also Known as Hay'at Tahrir al-Sham (Syria)	Department of State (July)	US revokes 'terrorist' designation for Syrian president's former group HTS Syria Sanctions Policy Recommendations for the Post-Assad Era

2025	<u>Sanctioning Lawfare that Targets U.S. and Israeli Persons</u>	Department of State (July)	<p><u>“Silence is not an option”: UN Special Procedures’ Coordination Committee condemns US sanctions on Francesca Albanese</u></p> <p><u>US sanctions on Special Rapporteur Francesca Albanese threaten human rights system: UN experts</u></p> <p><u>BHRC Statement on United States Sanctions on UN Special Rapporteur Francesca Albanese</u></p> <p><u>USA/Israel/Palestine: Immediately rescind sanctions against UN Special Rapporteur Francesca Albanese</u></p> <p><u>EFF Joins 55 Civil Society Organizations Urging the End of Sanctions on UN Special Rapporteur Francesca Albanese</u></p> <p><u>Trump Administration’s Sanctions on the ICC Implicates NGOs</u></p>
2025	<u>Guaranteeing Fair Banking for All Americans</u>	Office of the President (August)	<p><u>Five Things to Know About the “Debanking” Executive Order</u></p> <p><u>How the New Executive Order on Fair Banking Redefines Financial Inclusion and Tackles the Impact of De-Risking</u></p>

2025	<u>Imposing Further Sanctions in Response to the ICC's Ongoing Threat to Americans and Israelis</u>	Department of State (August)	<u>IBA condemns the imposition of additional US sanctions against International Criminal Court judges and officials</u> <u>US sanctions on ICC officials undermine independence of tribunal and justice for victims: UN experts</u>
2025	<u>Publication of Final Rule to Remove the Syria Sanctions Regulations</u>	Department of Treasury Office of Foreign Assets Control (August)	<u>United States of America Removes the Syrian Sanctions Regulations</u>
2025	<u>Commerce Eases Export Controls on Syria</u>	Department of Commerce Bureau of Industry and Security (August)	<u>Limited Relaxation of US Export Controls on Syria Leaves Many Restrictions in Place</u>
2025	<u>Federal Register: Relaxing Export Controls for Syria</u>	Department of Commerce Bureau of Industry and Security (September)	<u>OFAC and BIS Issue Final Rules Removing Syria Sanctions Regulations and Relaxing Export Controls for Syria</u> <u>More Relief for Syria: Commerce and Treasury Ease Export Controls and Revoke Sanctions</u>
2025	<u>Sanctioning Foreign NGOs Directly Engaged in ICC's Illegitimate Targeting of Israel</u>	Department of State (September)	<u>U.S. Expands ICC-related Sanctions to Include Three Palestinian Human Rights Organizations, Sparking International Outcry</u>

			<p>International Criminal Court - Related U.S. Sanctions Regulations Frequently Asked Questions for Nonprofit Organizations</p> <p>U.S. Sanctions on Palestinian Human Rights Organizations Erodes International Law, Civil Society Says</p>
2025	Foreign Terrorist Organization Designation of Los Choneros and Los Lobos (Ecuador)	Department of State (September)	<p>Rubio says U.S. is designating 2 Ecuador gangs as foreign terrorist groups: "Vicious animals"</p> <p>'It's a war': Marco Rubio labels Ecuadorian cartels 'foreign terrorists'</p>
2025	OCC Announces Actions to Depoliticize the Federal Banking System	Office of the Comptroller of the Currency (September)	OCC Takes Action to Curtail Debanking
2025	Designating Antifa as a Domestic Terrorist Organization	Office of the President (September)	<p>What Trump designating Antifa as a terrorist organization would mean</p> <p>Trump's Terrorism Designation of Antifa: Meaningless or Serious Threat?</p>
2025	Foreign Terrorist Organization Designation of Barrio 18 (El Salvador, Guatemala, and Honduras)	Department of State (September)	<p>Barrio 18 gang designated as foreign terrorist organization by Trump administration</p> <p>U.S. designates Barrio 18 as foreign terrorist organization</p>
2025	National Security Presidential Memo-7	Office of the President (September)	Summary and Commentary: Presidential Memorandum on Countering Domestic

			<p><u>Terrorism and Organized Political Violence - Charity & Security Network</u></p> <p><u>How NSPM-7 Seeks to Use "Domestic Terrorism" to Target Nonprofits and Activists</u></p> <p><u>C&SN Rejects Presidential Attacks on Nonprofit Organizations</u></p>
2025	<u>Federal Register: Prohibition on Use of Reputation Risk by Regulators</u>	Office of the Comptroller of the Currency Federal Deposit Insurance Corporation (October)	<u>OCC and FDIC Propose Rules to Eliminate Reputation Risk and Debunking</u>
2025	<u>Determination to Suspend the Imposition of Sanctions Pursuant to the Caesar Syria Civilian Protection Act of 2019</u>	Department of State (November)	<u>US declares partial suspension of sanctions on Syria after historic meeting</u>
2025	<u>United States Leads Effort to Delist Syrian Leaders</u>	Department of State (November)	<u>US Removes Syrian President From Global 'Terrorist' Sanctions List</u>
2025	<u>Sanctions and Export Relief for Syria: Triseal Advisory</u>	Department of Treasury Department of State Department of Commerce (November) (Updated December)	<u>Publication of Tri-Seal Advisory: Sanctions and Export Controls Relief for Syria</u> <u>U.S. government publishes Tri-Seal Advisory "Sanctions and Export Controls Relief for Syria" after U.S. Department of Commerce significantly relaxes export controls for Syria</u>

2025	<u>Foreign Terrorist Organization Designation of Antifa Ost, Informal Anarchist Federation/International Revolutionary Front, Armed Proletarian Justice, and Revolutionary Class Self-Defense</u> (Germany, Italy, and Greece)	Department of State (November)	<u>Foreign Terrorist Organization Listings of Antifa Groups Raise Risks for Civil Society</u> <u>US designates four groups in Europe as terrorists, calls them 'violent Antifa'</u> <u>U.S. adds 4 European leftist groups to foreign terrorism list</u>
2025	<u>Foreign Terrorist Organization Designation of Cartel de los Soles</u> (Venezuela)	Department of State (November)	<u>Hegseth Says Designating Venezuelan Cartel as Terrorist Org Will Bring 'New Options' to Administration</u> <u>A New Front on the War on Drugs: Implications of New FTO Designation</u> <u>Venezuela's Cartel de los Soles: what are the implications of its US 'terrorist' designation?</u> <u>US strike on alleged drug boat in Pacific kills four, as Trump accuses Venezuela of taking 'our oil'</u>
2025	<u>FinCen Alert on Cross-Border Funds Transfers Involving Illegal Aliens</u>	Department of Treasury Financial Crimes Enforcement Network (November)	
2025	<u>Implementing National Security Presidential Memorandum-7: Countering Domestic Terrorism and Organized Political Violence</u>	Office of the Attorney General (December)	<u>Leaked Memo Shows DOJ Plans Aggressive Targeting of Nonprofits</u>

			<p><u>DOJ Issues Sweeping New Domestic Terrorism Directive: What the Attorney General's December 4 Memorandum Means for You</u></p> <p><u>Bondi orders US law enforcement to investigate 'extremist groups'</u></p>
2025	<u>Preliminary Findings from the OCC's Review of Large Banks' Debanking Activities</u>	Office of the Comptroller of the Currency (December)	<p><u>OCC Issues Preliminary Findings on Its Supervisory Review of Large Banks' "Debanking" Activities</u></p> <p><u>OCC Releases Preliminary Findings from Debanking Investigation</u></p>
2025	<u>Trump Announces Blockade on Venezuela</u>	Truth Social (December)	<p><u>Blockading Venezuela: The International Law Consequences</u></p> <p><u>Venezuela's Navy Begins Escorting Ships as U.S. Threatens Blockade</u></p>
2025	<u>Foreign Terrorist Organization Designation of Clan del Golfo (Colombia)</u>	Department of State (December)	<p><u>U.S. designates notorious Colombian cartel a terrorist group, opening door to possible military action</u></p> <p><u>Clan del Golfo Is Latest Latin American Drug Cartel Designated a Terrorist Organization by the U.S.</u></p> <p><u>The US labels another Latin American cartel a terrorist group as the anti-drug war escalate</u></p>

2025	<u>H.R.6800 - To amend the Internal Revenue Code of 1986 to terminate the tax-exempt status of terrorist supporting organizations - Bill Text</u>	Congress (December)	<u>Congressman Kustoff Introduces Legislation to Strip Tax-Exempt Status from Terrorist-Supporting Non-Profits</u> <u>Nonprofit Killer Bill Re-Introduced in the House and Senate</u>
2025	<u>S.3554 - A bill to amend the Internal Revenue Code of 1986 to terminate the tax-exempt status of terrorist supporting organizations</u>	Congress (December)	<u>Cornyn, Sheehy Introduce Bill to Revoke Tax-Exempt Status of CAIR, Groups Bankrolling Terrorists</u>
2025	<u>S.2296 - National Defense Authorization Act for Fiscal Year 2026 - Sec. 6211. Repeal of Caesar Syria Civilian Protection Act of 2019</u>	Congress (December)	<u>Caesar Act Repeal and the Syria Sanctions Removal Report Card</u> <u>Syria welcomes repeal of sweeping US sanctions</u>
2025	<u>Sanctioning ICC Judges Directly Engaged in the Illegitimate Targeting of Israel</u>	Department of State (December)	<u>ICC strongly rejects new U.S. sanctions designations against two ICC Judges</u> <u>The Sanctioning of Law: On the US Government's Sanctions Policy Against the International Criminal Court</u> <u>European States Raise Alarm Over New US Sanctions on ICC Judges</u>