

20 July 2021

Mr. Vasily Grigoriev CEO - BPC Banking Technologies info@bpcbt.com

Dear Mr. Grigoriev,

Re: Use of BPC technologies to fund and reward terror

We are writing to inform you that BPC has become the latest victim of the Palestinian Authority's (PA) terror funding and rewarding "Pay-for-Slay" policy. **To avoid potential liability, BPC must take immediate action**.

The PA has implemented its "Pay-for-Slay" policy since its creation. As part of the policy, the PA pays monthly salaries to terrorist prisoners (including murderers) and released terrorists and allowances to wounded terrorists and the families of dead terrorists (including the families of suicide bombers). It is estimated, that in 2020 alone, the PA spent at least 750 million shekels (\$228,618,225) on the "Pay-for-Slay" payments¹.

Since exposed by <u>Palestinian Media Watch</u> (PMW) in 2011, different steps have been taken, domestically and internationally, to combat the policy.

Most recently, Israel passed anti-terror legislation² in which it prohibited the performance of any activity with property, including a banking activity, undertaken for the purpose of rewarding a person for the commission of a terrorist offence.

Based on the Anti-terror legislation and noting the PA practice to make its "Pay-for-Slay" payments through the bank accounts of the terrorists in the commercial banks, PMW wrote to the banks³ operating in the areas controlled by the Palestinian Authority. In the letter, PMW warned the banks that if they continued to operate the accounts of the terrorists and continued to receive funds from the PA on behalf of the terrorists, they would be subjecting themselves to potential criminal and civil liability.

¹ <u>https://palwatch.org/page/18603</u>

² <u>https://www.idf.il/media/65305/%D7%97%D7%95%D7%91%D7%A8%D7%AA-252.pdf</u>, p. 33

³ <u>https://palwatch.org/page/17790</u>



Responding to PMW's warning and the new law, the commercial banks closed the accounts of more than 35,000 terrorists⁴.

Desperate to find an alternative solution in order to continue implementing is pugnacious policy, the PA decided to make the payments through the PA postal service. Since the implementation of this decision required the terrorists and their families to wait in long lines in order to receive their cash terror rewards, the PA had to rethink⁵.

Having reconsidered, the PA recently announced the distribution of specifically designated ATM cards, through which the terrorists and their families will be able to withdraw their terror rewards at their own leisure⁶.

Presenting the new system, the Director of the PA funded PLO Commission of Prisoners' Affairs Qadri Abu Bakr explained:

"Every prisoner or Martyr will be given an ATM card that will enable it to go and withdraw [salaries] at any time, day or night – this will make things easier for them."

[Official PA TV News, July 6, 2021]

Expanding on the background and providing technical details, the PA Minister of Communications and IT, Is'haq Sidr added:

"We have activated an entire banking mechanism here that is a cash management system that transfers data between us and the ATMs. We have installed 20 ATMs in the residential areas where the beneficiaries of these services are located, and Allah willing we will reach 30 ATMs in the coming days."

[Official PA TV News, July 6, 2021]

PMW's research indicates that the PA uses BPC technology⁷ to operate its National Switch system and the designated ATMs through which the PA is

⁴ <u>https://palwatch.org/page/21739</u>

⁵ <u>https://palwatch.org/page/23944</u>

⁶ <u>https://palwatch.org/page/26012</u>

⁷ <u>https://www.finextra.com/pressarticle/60573/national-switch-goes-live-in-palestine;</u> <u>https://english.wafa.ps/Pages/Details/83963</u>



now making the payments. These ATM cards cannot be used in the commercial banks.

The 2018 Taylor Force Act found that the PA's terror reward policy "is an incentive to commit acts of terror." Facilitating the payment of funds, which both incentivize and reward terror, would most certainly be considered to be a violation of 18 U.S. Code § 2339A - Providing material support to terrorists.

By providing the terrorists and their families with ATM cards that are based on BPC processing technology, in the knowledge that the terrorists and their accounts are personae non gratae in the commercial banking world, the PA has intentionally dragged BPC into the PA's terror reward program.

It should be noted, that among the recipients of the cash terror rewards are, inter alia, terrorists who were convicted of the cold blooded murder of US citizens. Since BPC has US branches, this could be of particular significance.

For example, should BPC continue to allow the PA to use its technology in order to implement its "Pay-for-Slay" policy, it would not be unreasonable to expect the families of those victims to seek financial remedies in the US.

Since PMW believes that the actions of the PA were most probably undertaken without informing BPC of its illicit plan and the intention to use the company's technology as a means to pay the outlawed rewards, we thought that it would be important to bring this issue to your immediate attention.

To avoid potential liability, PMW suggests that BPC take urgent action to prevent the PA form illicitly using BPC technology to reward terror and terrorists.

Yours sincerely,

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