

Guidance on Charitable Giving to Syria

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Muslim Advocates provides this general guidance to donors engaging in charitable giving to NGOs, friends, and family in Syria and neighboring countries. The laws for foreign charitable giving are complex and constantly evolving. We urge donors to exercise due diligence prior to providing money, items, or services abroad and to consult with an attorney to provide guidance for your specific circumstances.

For the latest comprehensive information on restrictions on transactions with Syria, refer to the U.S. Treasury Department's Syria Sanctions page at <http://www.treasury.gov/resource-center/sanctions/Programs/pages/syria.aspx>.



Can I donate to a U.S.-based 501(c)(3) public charity that provides assistance to Syrian refugees?

Yes. As with any donation, exercise due diligence when choosing a charity to support. If possible, review the organization's annual report, IRS Form 990, financial statements, and/or audit reports. When donating, make it clear in writing that you'd like to support a specific humanitarian effort and keep records of your donation. Make sure you know who or what group is receiving the funds overseas, for what purpose, and where and how the funds will be used. In addition to donating to a U.S.-based 501(c)(3), funds may also be provided to the National Coalition of Syrian Revolutionary and Opposition Forces. Read Syria General License No. 16 at the website above for more details.

Can I send money to family or friends in Syria?

Yes, provided that the money is (1) a gift or personal loan to your family or friends; (2) not a charitable donation to or for the benefit of any entity, or for use in supporting or operating a business; (3) sent through a U.S. bank, registered securities agent, or registered money transmitter; and (4) not sent by, to or through the Government of Syria, a blocked entity, or entity on the OFAC List of Specially Designated Nationals (at <http://sdnsearch.ofac.treas.gov>). Funds cannot be sent through the Commercial Bank of Syria, the Syrian-Lebanese Commercial Bank, or the Syria International Islamic Bank (SIIB). [OFAC Syria Gen. License No. 6; Exec. Order No. 13,582]

Can I donate directly to a non-governmental organization (NGO) that operates inside Syria or a neighboring country? How about donating through family or friends traveling to the region?

If you wish to donate funds in support of humanitarian work in Syria, you may do so by transferring funds to a U.S. or third-country NGO that supports (1) humanitarian projects to meet basic human needs in Syria, (2) activities to support democracy building in Syria, (3) activities to support education in Syria, or (4) activities to support noncommercial development projects that directly benefit the Syrian people. However, you may not send the funds directly to an NGO in Syria and you may not donate through individuals (family, friends, etc.) taking cash to Syria for charitable distribution. If you wish to send a charitable donation directly to Syria, or for the benefit of the Government of Syria or any other blocked person or entity, you must apply for and obtain specific license authorization from OFAC to transmit such funds. [31 C.F.R. § 542.408; OFAC Syria Gen. License No. 11; Exec. Order No. 13,582]

Can I give money to a friend or family member who says they will collect and transfer the funds to a contact in Syria, possibly for non-humanitarian assistance or some other non-NGO purpose?

No. A person trying to donate money to Syria through a friend or family member cannot be sure that the donation will be sent through one of the authorized institutions, or that the funds will go only to an authorized person or entity and for an authorized purpose. Because of the restrictions on where and how transferred funds may be used in Syria, it is important that you exercise due diligence in determining how your funds will be transferred, how they may be used and by whom. If your money is sent to or used in Syria in an impermissible manner, you can be held liable even if you had no actual knowledge of the facts.