



COUNCIL *on* FOUNDATIONS



6 July 2015

Financial Action Task Force (FATF) Secretariat
Attn: Richard Berkhout, Policy Analyst
Financial Action Task Force
2, rue Andre Pascal – 75775 Paris Cedex 16

Re: Financial Action Task Force U.S. Mutual Evaluation

Dear FATF Secretariat:

On behalf of the Council on Foundations and the Charity & Security Network, we are pleased to submit the enclosed paper to the Financial Action Task Force U.S. Mutual Evaluation team.

The purpose of the enclosed paper is to acclimate the evaluation team to U.S. counterterrorism laws and regulations that impact the work of U.S.-based nonprofit organizations (NPOs), both operating charities and grantmakers. We hope these comments will provide context for the evaluators and illustrate the impact of the U.S. counterterrorism regime on NPOs.

The Council on Foundations is a nonprofit leadership association of grantmaking foundations and corporations, based in Washington, D.C., that promotes professional standards in philanthropy and advances a culture of charitable giving in the United States and globally. Many of our nearly 1,500 member foundations and other grantmaking institutions make grants internationally and are impacted directly by the U.S. counterterrorism regime. As policy experts on philanthropy, the Council has a long record of assisting the U.S. Congress and regulators in crafting legislation regarding non-governmental organizations.

The Charity & Security Network represents a broad cross-section of nonprofit organizations working on humanitarian aid, development, peacebuilding, human rights and civil liberties, along with grantmakers, donors and faith-based groups. Our goal is to increase the operational space for nonprofit programs that address the root causes of poverty and conflict through enabling peacebuilding, ensuring unfettered civil society access to civilian populations impacted by conflict, disaster and poverty, protecting civil society and human rights defenders from government infringement on the rights of free speech, assembly and association, and building an enabling framework for counterterrorism related regulation of nonprofits.

We would be honored to meet with the evaluators when they arrive in the U.S. and assist in convening a representative group of U.S. nonprofits and grantmakers to meet and advise the team on how counterterrorism policies affect their work. Please do not hesitate to contact us if we can serve as a resource.

Thank you for the opportunity to comment to the evaluation team.

Sincerely,

Vikki Spruill
President & CEO
Council on Foundations

Kay Guinane
Director
Charity & Security Network