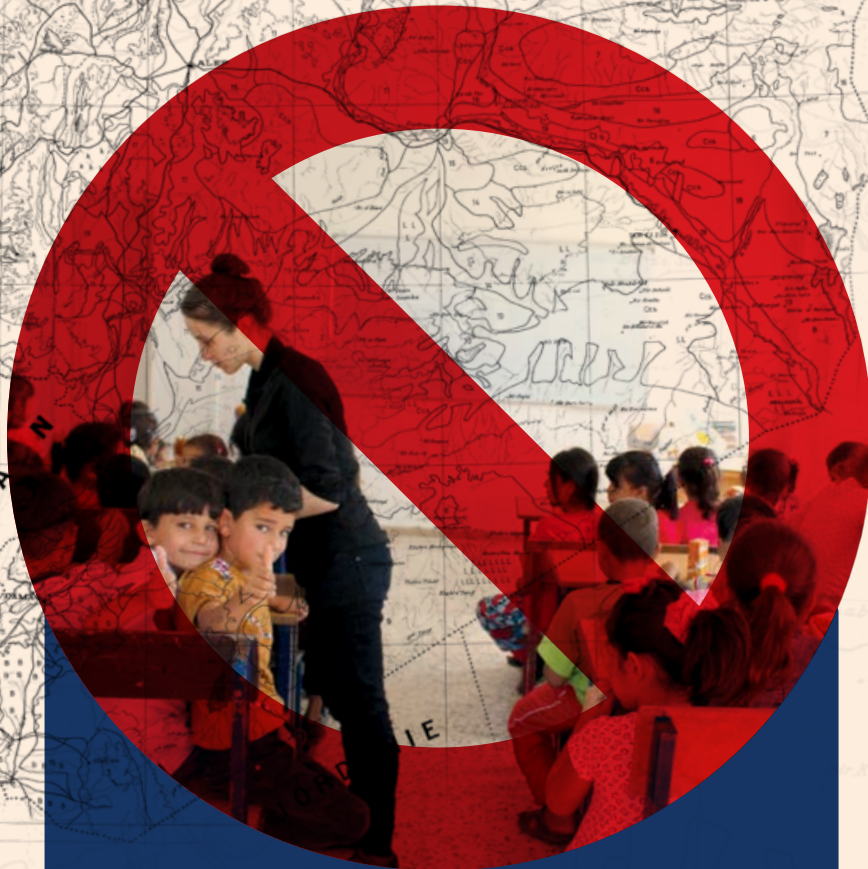




CODSSY

Collectif De Développement Et Secours Syrien
التجمع السوري للتنمية والإغاثة



Is Help Allowed?
**How French financial institutions
hinder humanitarian action in Syria**

ABSTRACT

Under what framework are organizations that support Syrian civil society allowed to operate? This question has been raised a staggering number of times in France over the last few years. Since 2014, financial institutions have imposed an increasing number of obstacles upon Franco-Syrian peaceful and democratic organizations. Due to growing mistrust from banks and payment processors towards these Franco-Syrian organizations, financial transactions have become incredibly more complex, and have at times been rendered impossible.

Over the course of three months of research, during which 25 Franco-Syrian organizations were interviewed, we observed that 96% of these organizations experience or have experienced serious financial obstacles because of actions taken by 4 of the 5 major French bank groups. This issue is structural: with France strengthening its policies against money laundering and terrorism financing, French financial institutions have had no other option but to significantly tighten their risk policies, which has led them to avoid transactions linked to Syria and Syrians.

None of these organizations question the legitimacy and the importance of strengthening oversight over financial flows. However, they acknowledge it is necessary to ensure that what is known as the “precautionary principle” does not constitute an impediment to humanitarian action. At a time when France is on the verge of becoming one of the five major financial contributors to humanitarian work and crisis stabilization globally, we hope for a consultation between various actors (organizations, public authorities, and financial authorities) so that this political and strategic commitment to humanitarian efforts may manifest itself in practice.

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Humanitarian work in Syria: victim of banks' application of the precautionary principle

After being alerted of repeated and unjustified financial blockages by several Franco-Syrian organizations, the Syrian Network for Relief and Development (CODSSY) and three of its member organizations (ASML/Syria, INS and Women Now for Development) decided to investigate the situation to determine the scale of the problem. What is the scope of these financial hurdles imposed by banks and payment processors? Who are the organizations being targeted? By whom? Why are these impediments to supporting Syrian civilians occurring at a time when the need for humanitarian action has never been higher?

After three months of research, our findings bring to light widespread discriminatory behavior on the part of financial institutions. In France, since 2014, it has become unbearably difficult for organizations of all sizes to manage funds aimed at supporting the civilian Syrian population. From the French and international medical union, Union des Organisations de Secours et Soins Médicaux (UOSSM), to CCFD Terre-Solidaire, including member organizations of the International Federation for Human Rights (FIDH), and even smaller groups exclusively composed of volunteers, almost all the organizations interviewed were strictly denied services by banks and payment processors and/or experienced challenges transferring funds.

We observed that Franco-Syrian organizations primarily face four types of obstacles: rejection of bank account applications, closure of existing bank accounts, closure of accounts with online payment processors, and denial of bank transfers. No less than half of the organizations interviewed have seen one or two of their bank accounts closed, and three fourths are experiencing growing challenges when it comes to receiving funds and transferring them to their beneficiaries. Financial institutions are primarily to blame for these situations.

In responses to the surge in terrorist attacks around the world and particularly in France, the French government has urged financial institutions to exert extreme vigilance when fighting money laundering and terrorism financing, and has encouraged strict implementation of what is known as the "precautionary principle." The French Authority for Banks and Insurances has been carrying out additional audits and penalizing financial institutions if they fail to abide by monitoring requirements. Between 2015 and 2016, the French Prudential Supervisor and Resolution Authority (ACPR) inspected 52 banks and insurances companies, a process that led to the sanctioning of 11 banks for a total of 6,47 million euros¹. Without a doubt, ACPR's actions have convinced banks to be increasingly cautious. But are these financial controls carried out in

¹—"The fight against money laundering: Société Générale is responsible for 'several shortcomings,'" Le Monde, July 22, 2017

the name of the precautionary principle truly effective? Our research revealed that despite serious attempts by humanitarian actors to be extremely transparent about their work and finances, they nonetheless face many blockages. They are asked to provide activity reports, purchase invoices, videos and pictures of field projects, details on their beneficiaries' identities, information on public finances... despite providing written proof that funds are being spent in a legitimate manner and are adequately distributed among beneficiaries, it has become extremely difficult to reassure most financial institutions. As a result, projects aimed at building schools and purchasing medical or food supplies have been consistently delayed because banks and online money transfer services have denied their financial services to organizations.

Financial institutions, on the other hand, carry out their work with utter lack of transparency. They rarely explain their rationale behind account freezes, shutting down bank accounts, rejecting new account applications, or delaying and denying transfers, and there is no supervisory body responsible for verifying the legitimacy of these account freezes and the delays in service provision. To implement the strict precautionary principle requested by the state, financial actors seem to have two options: either invest in audit services, or compliance, which would require investments of several million euros, or—a more economical solution—reduce the margin of error by refusing to provide their services to humanitarian actors working in Syria, who are considered to be “at risk”

clients. Has the precautionary principle become an excuse to limit risks at all costs?

Through this research, we have observed that many refusals of service seem carried out in an arbitrary manner. It also seems that the mere mention of the words “Syria” or “Syrian refugees” can trigger blockages by financial institutions. However, humanitarian and development work are integral components of France’s strategic interests abroad and are essential to the fight against terrorism. On March 22, 2018, during the 4th National Humanitarian Conference, the Minister of European and Foreign Affairs, Jean-Yves Le Drian, honored French humanitarian actors working around the world for their “unfailing commitment,” highlighting that “humanitarian action is one of the pillars of France’s foreign policy.”²

While 13 million people in Syria and over 5 million Syrian refugees around the world are targeted by the Syrian regime and terrorist groups, the obstacles to humanitarian action laid by financial institutions present a serious challenge to France, Europe, and the international community’s humanitarian and security strategy. The ideologies of extremist groups cannot be challenged if the roots of poverty, illiteracy, and inequality are not tackled. “Taking action for Syria means taking action for the Syrian people, but it also means protecting ourselves against Islamist terrorism (...) We must therefore protect ourselves by joining forces,” said Emmanuel Macron at the United Nations only six months ago, on September 19, 2017. Will financial institutions be exempt from this call to join forces?

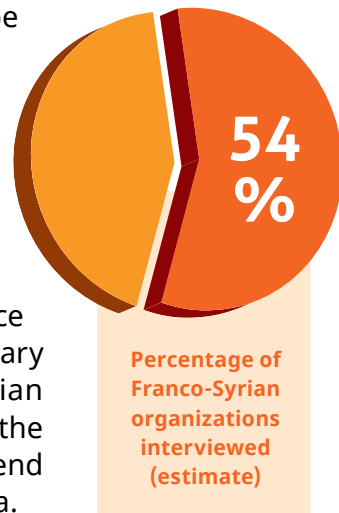
² “Humanitarian strategy of the French Republic 2018-2022,” p.3, Ministry of European and Foreign Affairs

Methodological note

This report was written by the Syrian Network for Relief and Development (CODSSY) and three of its member organizations: ASML/Syria, Initiative for a New Syria and Women Now for Development.

It aims to raise awareness of the financial blockages that many peaceful and democratic Franco-Syrian organizations have had to face when attempting to carry out their activities for populations in Syria or with Syrian refugees internationally.

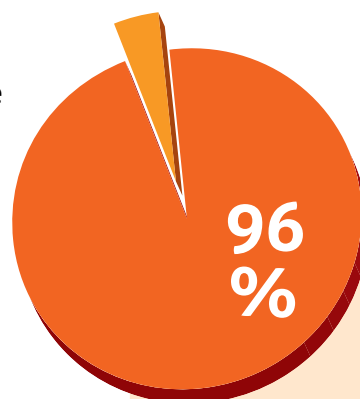
To identify the organizations that may be likely to face such obstacles in France, we based our research on a directory created by Dr. Samira Mobaied, which lists 232 organizations working primarily on the behalf of civilians in Syria and registered on the French Official Journal of Organizations. Among them, we identified 58 active organizations³ registered in France for more than 12 months and whose primary mission is to work alongside the civilian Syrian population remaining in Syria or the Syrian refugee population, and who defend a peaceful and democratic future in Syria.



Between January and March 2018, we contacted each of these 58 organizations to determine which ones have a bank account and carry out transfers abroad.

³ We consider organizations to be active when they have held or plan on holding a general assembly in 2018, or, when we have not obtained information on a general assembly, we consider an organization to be active when they have been engaged in online activities (website, social media, press releases) over the last 6 months. It is possible that some small organizations, active but largely absent from the Internet, have not been identified by this study.

We received responses from 38 of these groups; among these, 13 organizations do not carry out international transfers. Therefore, we estimate that there are between 25 and 46 peaceful and democratic Franco-Syrian organizations who are likely to experience account freezes and other financial obstacles.



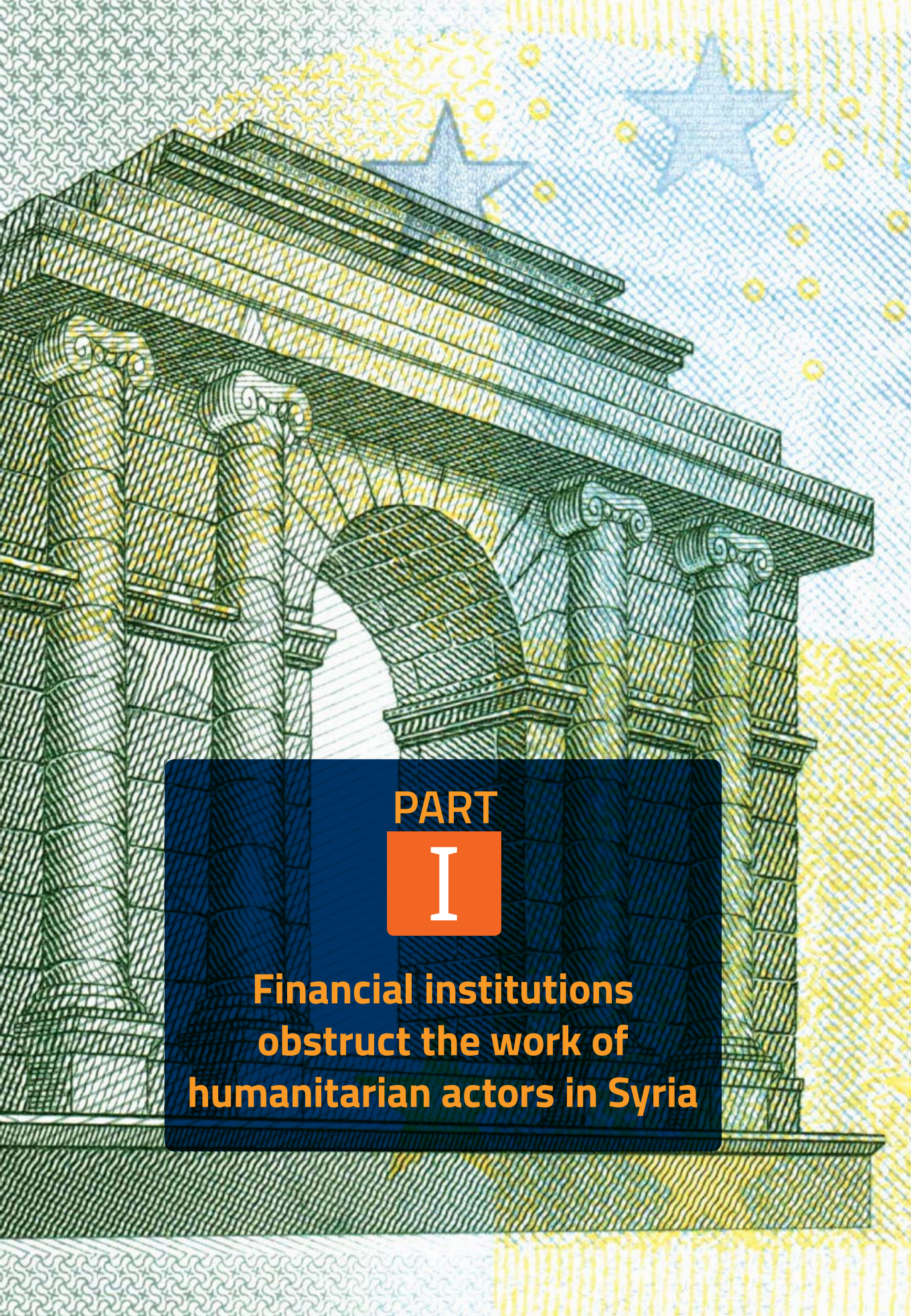
Percentage of organizations interviewed that have experienced or are experiencing financial obstacles

We interviewed 25 Franco-Syrian organizations. Our sample thus represents 54% of the organizations that were identified at the beginning of this study. At least 24 of these organizations experience challenges with their banks—thus, 96% of our sample group. This group includes the most prominent and influential organizations, in terms of budget and finances, among the sample.

Many French NGOs working in countries under embargo, impacted by terrorism, or targeted by economic sanctions, often face significant challenges when transferring funds to vulnerable populations, including Syrian civil society. Among this group, we interviewed two internationally-recognized NGOs working with Syrian refugees: CCFD-Terre Solidaire and CARE France.

In order to broaden our horizon, we also turned to our European and international colleagues. In doing so, we observed that the challenges we noticed in France extend beyond France's borders. We identified four countries where organizations linked to Syria also face significant financial obstacles: the United Kingdom, Belgium, Germany, and Lebanon.

The list of organizations interviewed is listed in the appendix of this report.



PART

I

**Financial institutions
obstruct the work of
humanitarian actors in Syria**

A

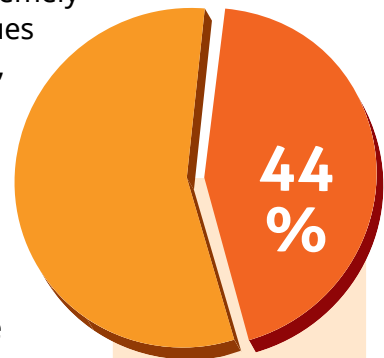
A generalized ban on financial transaction to Syrians

1

80% of the organizations interviewed have been denied financial services

What is a better option, when one does not want to take any risks, than doing nothing? Among the four main obstacles identified by organizations, three are aimed at categorically refusing services to the organizations concerned. Therefore, of the 25 Franco-Syrian organizations interviewed, half of them explained that their bank account was closed without any apparent motive and without any explanation on the part of the bank itself.

This occurred with personal and professional accounts, all of which have been shut down very quickly. “When our agency of the Crédit Lyonnais decided to shut down our account, our organization was doing extremely well financially. We had never had any issues with the organization’s bank account, and I also had a personal account at the bank for over 20 years. I truly did not understand why they suddenly decided to close down all of my accounts,” explained the President and Founder of the NGO Syria Charity. Late 2012, Crédit Agricole closed the bank account of the Comité d’Aide Humanitaire au Peuple Syrien (Comsyr). Following this incident, in 2014 the organizations ASPS (Association de Soutien au Peuple Syrien), member of the International Federation for Human Rights (FIDH), and Women Now for Development, faced the same issue twice with two separate banks. Created by the renowned journalist and writer Samar Yazbek, Women Now for Development, an organization dedicated to the empowerment of Syrian women, had to switch banks three times in just a few months.



Percentage of organizations interviewed victim of bank account closures

“In August 2014, the Banque Postale closed our bank account after a year of collaboration, whereas there had never been any issue,” explained the organization’s director, Maria al Abdeh. The organization subsequently opened an account at Société Générale, but four months later, this bank also decided to shut down their account. “Everything seemed to be going fine. We submitted the requested receipts and other documents and our advisor was satisfied. When I received the notice in the mail, I first thought it was a mistake. It was truly shocking,” explained Claudine, volunteer treasurer for the organization, and an accountant by training.

Audited by the French banking authority in 2014 and charged, three years later, to a 5 million euro fine for deficiencies in its anti-money laundering and terrorism financing systems⁴, Société Générale seems particularly committed to limiting potentially at-risk transactions. Six of the nine organizations interviewed who

are or used to be clients of the Société Générale bank affirm that their account has been closed, while the remaining three have experienced significant obstacles in their banking operations.

64%
**of Franco-Syrian
organizations
interviewed**
experience at
least two types
of financial
obstacles



While it is primarily major French banks that engage in this type of behavior, smaller structures are also not exempt from blame. Among these smaller structures, HelloAsso, an online crowdfunding platform for non-profit organizations, and its online banking partner Lemon Way, appear to have been particularly wary of partnering with organizations linked to Syria.

When HelloAsso and Lemon Way began collaborating in mid-2017, and after 10,000 clients were transferred from HelloAsso to Lemon Way's platform, the latter found itself required to authenticate all its new clients in record time. Many organizations working in "high-risk" countries such as Syria were blacklisted.

8/8

accounts
closed by
Lemon Way

between
June and August 2017

Thus all of the
organizations
interviewed that had
an account with its
partner, HelloAsso,
during this time frame

As a result, of the 8 organizations we interviewed that had an account with HelloAsso, every single one of them was banned from the fundraising platform between June and August 2017 and these are not isolated cases. HelloAsso's management mentioned that 20 Franco-Syrian organizations were prevented from using their services in the space of a few months. [cf. The precautionary principle: an excuse to be exempt from monitoring obligations?]

In addition to the abrupt closure of bank accounts, we observed that banks increasingly reject applications from organizations wishing to open new accounts. Seven of the organizations interviewed, thus 28% of our sample, experienced challenges when submitting applications to open new accounts. This was sometimes because they had previously had an account shut down by the bank in question—but this was not the case across the board.

Therefore, following the closure of their bank account by Société Générale, the organization Women Now for Development struggled to open a new account with Crédit Lyonnais, who rejected their application. On a similar note, the French and international medical union UOSSM attempted twice to open a bank account, first with Crédit du Nord and then with Neufilize OBC, but failed on both occasions despite spending two months proving their organization's work was credible and legitimate. (cf. appendix).

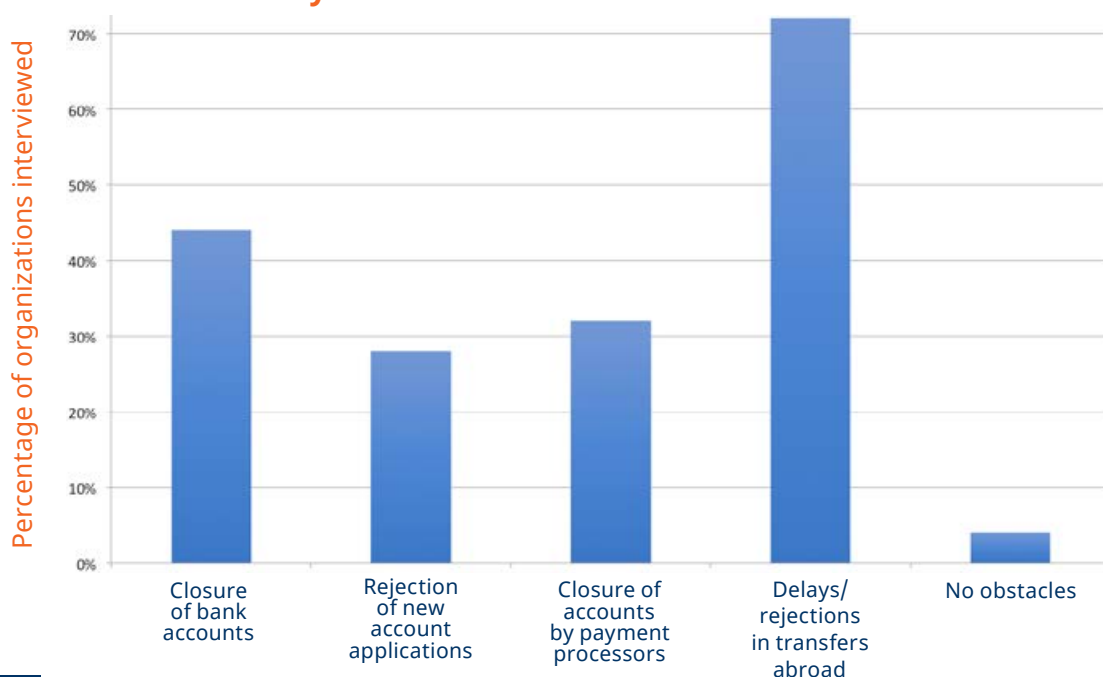
⁴ "The ACPR sanctions the Société Générale," Les Echos, July 24, 2017

The categorical refusal to provide any service, however, is not the only way that French financial actors avoid transactions related to Syria. When organizations finally succeed in opening a bank account or maintaining their existing accounts, they still face considerable difficulties when trying to send much-needed funds to their missions on the ground.

Over 70% of the organizations interviewed report great difficulties when transferring funds abroad, whether this be to Lebanon, Jordan, Turkey, or even within Europe. “Starting in 2015, our bank began asking us to submit detailed receipts and explanations for each expenditure—including the purchase of potatoes needed for cooking in a hospital kitchen, cleaning supplies, and other basic necessities. But we have projects that necessitate bank transfers of 100,000 to 200,000 euros, which requires us to provide an inordinate amount of paperwork,” explained Dr. Ammar Chaker,

UOSSM’s general secretary. These restrictions have also impacted internationally-recognized organizations such as CARE France, CCFD-Terre Solidaire, and the Centre Syrien des Medias et de la Liberté d’Expression (SCM), created by Mazen Darwish and member of the International Federation for Human Rights (FIDH). “Banks have seriously tightened their financial controls ever since they have been sentenced to heavy penalties for failing to comply with their due diligence obligations,” commented the financial director of CCFD-Terre Solidaire. “As soon as the words “Syria” or “Syrian refugees” appear in an organization’s mission statement, the bank transfer is instantly blocked. It can take up to two months for a solution to be reached.” SCM, moreover, has never successfully been able to transfer funds in dollars or pounds. “We have had bank transfers denied between France and the UK, Turkey, Australia, Ireland, Canada, Switzerland, Denmark, and Belgium,” stated Ben Lydon, SCM’s program director.

Primary obstacles identified



Account freezes have triggered unfortunate series of events. For instance, the organization Syria Charity once realized that two large banks were systematically blocking their donors' transfers to the organization's account. "It seems we were triggering an orange flag within the Crédit Mutuel and the CIC for no apparent reason, because as soon as we presented our organization's authentication documents, the problem was immediately resolved. In fact, if these banks had legitimate worries regarding our activities, they would have flagged us to the authorities, and I dare hope that our background would have then been thoroughly checked," observed the organization's president, who was fortunate to have been alerted to the situation by donors who know him personally. "We compiled a file that thoroughly describes the projects and finances of our organization. Ever since we were informed of this problem, we systematically send this document to the banks, and this has prevented us from having to deal with this type of situation." Private donations trigger an additional set of problems, as organizations typically collect these donations in cash. According to financial institutions, cash funds collected during awareness-raising events are risky. "As soon as the sum is considered too great, our bank refuses that we place the money on our account. It's unbelievable that the system prevents us from being transparent and honest in this manner," explained Mohammad Alolaiwy. Anxious to keep perfectly transparent and indisputable accounts,

the organization thus decided to declare all the funds that it cannot deposit on its account to its auditor.

"The absurd is lucid reason noting its limits," once wrote Albert Camus in the *Myth of Sisyphus*. In October 2015, less than a year after having been fined 9 billion dollars (7,9 billion euros) by American regulators for having bypassed an American embargo on a number of countries⁵, the BNP (via its Belgian branch) once again made front page news. "The almost-star: Marie Peltier, interrogated for buying a train ticket..." one could read on the RTBF's site, in an article published on November 4, 2015. "We invited Marie Peltier to participate in a conference in Paris, on the occasion of a charity gala that we were organizing," explained Mohammad Alolaiwy, president of Syria Charity. "Marie Peltier purchased her train ticket with her own personal funds. When we wanted to reimburse her for those expenses, the Belgian branch of the BNP declined the transfer without further consideration.

The word "Syria" in our organization's name must have raised alarm, but instead of looking into the operation, the bank simply declined the transfer without further investigation. Thanks to media pressure, the banking agency eventually folded, but I am not convinced that a solution would have been reached otherwise," stated Mohammad Alolaiwy.

⁵ "BNP will be fined close to 9 billion dollars in the United States," *Le Monde*, June 30, 2014.

B

The precautionary principle leads to an abusive rejection policy

1

Organizations go above and beyond their transparency requirements

Despite the ongoing war in Syria, now in its seventh year, organizations have been undertaking considerable efforts to provide ample information that can help banks and financial institutions have a detailed understanding of the expenses incurred by their organization and partners.

“Before closing down our account, Crédit Agricole would ask us details about the families we were supporting. I would send pictures, copies of their passports, information about their jobs... anything that could prove that they were indeed civilians in need,” explained Inès, the president of Nazra. Like this organization, all of the groups interviewed detailed their diligent efforts to guarantee the transparency of their work. Despite these efforts, NGOs must wait several weeks, sometimes several months, to eventually find their funding transfer requests regularly denied.

In September 2017, the organization Tous pour la Syrie was prevented from carrying out a transfer of less than 2,400 euros for a duration of 50 days, despite the funds having already been debited from the account and despite efforts to help the bank trace the funds’ destination. “I

provided a dozen documents to prove that the funds were indeed being allocated to a school project for Syrian refugee children in Jordan: receipts from the school’s construction company, receipt for school supplies... all purchases could be adequately traced,” explained the organization’s treasurer. Once the departmental director for Crédit Agricole intervened, the situation was finally cleared, but four months later, on January 18, 2018, a 3,600€ transfer for an NGO partner based in Turkey and Lebanon was denied, despite proof confirming its destination and the quality of the partner’s work ([cf. appendix](#)).

The general secretary for the Organisation de Secours et de Soins Médicaux (UOSSM) was furthermore surprised when he was denied approval on two occasions to open a bank account at the beginning of the year. The organization had exchanged with the bank for almost two months, and had provided all the documents requested to prove the organization was honest and legitimate.

To facilitate its relationship with financial institutions, the NGO Syria Charity decided to seek the services of the largest audit company in France: Deloitte. “After facing

consistent challenges, we decided to seek the services of this audit company in order to foster a greater relationship of trust with the banks. Today, we experience fewer financial blockages, but transfers still take longer than they should,” explained Dr. Mohammad Alolaiwy, founding president of Syria Charity. The finance sector’s mistrust of the receipts and other supporting documents presented by organizations does not only concern small, relatively unknown organizations, but also renown NGOs such as CARE France or CCDF-Terre Solidaire.

The closing of the Syrian Network for Relief and Development’s (CODSSY) fundraising account by the crowdfunding site HelloAsso and its financial partner Lemon Way raises additional questions. Although CODSSY immediately provided all the requested documents, it received a letter stating that the documents were received but that the identity card of the board member provided “cannot be analyzed due to the absence of the organization’s statutes.” However, these statutes were simultaneously “accepted” in the same letter. “This decision makes absolutely no sense. We have asked

for an explanation, but received no response,” explained Majd Massouh, CODSSY’s coordinator. In addition to this, HelloAsso acted unprofessionally by taking a significant amount of time before letting CODSSY recover the funds it had raised on their platform. “For a duration of three months, you will still be able to receive your payments on the bank account registered with our website,” stated the letter explaining HelloAsso’s decision to close down CODSSY’s account. In reality, the account was closed down only two days later.

None of the organizations interviewed in this report challenge the rigor of the inspections and audits targeting their organizations. However, they acknowledge that the slow progression of these processes, and their frequent failure, is problematic, particularly given the urgency of the situation in Syria. “It’s unbelievable that we are treated in this way, despite everything we are doing to prove that our work is legitimate,” concluded Nazra’s president. This disbelief, shared by all the organizations involved, is strengthened even further by the fact that financial institutions consistently fail to provide justifications for their decisions.



Children sponsored in Syria. Credits: Nazra

“When transfers are blocked or delayed, we try to understand the reasons behind these actions in order to find solutions to the problem, but the reasons are rarely explained to us. The reasons for the blockages are not transparent. This makes it significantly harder to solve the problem at hand,” explained the financial director of CCFD-Terre Solidaire. There is a sharp contrast between the transparency of organizations and the lack of transparency of financial institutions.

At their bank, organizations receive no explanation, and aren’t even assigned a reliable contact person with who they could develop an effective relationship conducive to collaboration. “Whenever I submit a transfer order, I know that it will be hard to predict the outcome. One transfer order out of three, or even one out of two, is denied,” explained the president of Syria Charity.

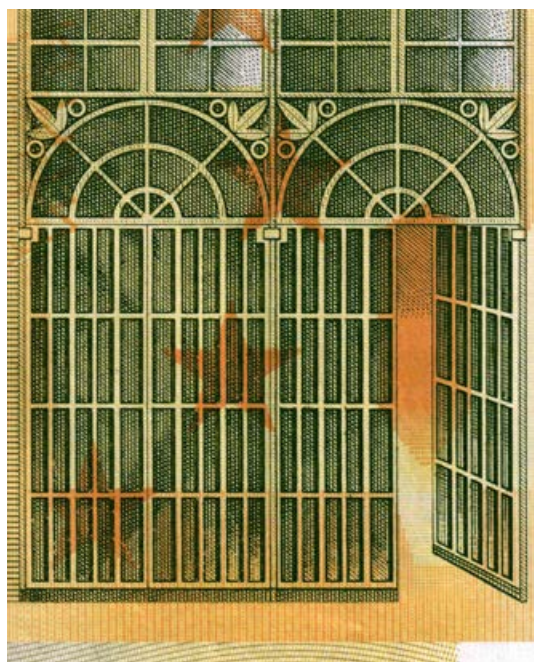
Complete silence on the part of the banks

None of the banks and online payment platforms took the time to explain the motivations behind their abrupt decisions. The vast majority of termination letters are identical and impersonal, and some banks did not even provide a written explanation for their decision to reject a new account application. Moreover, banks typically do not provide any follow-up information when transfers are delayed or canceled. As a result, the organization Tous pour la Syrie was never informed that one of its transfer

orders to an NGO partner in Turkey was denied. “The bank remained silent until we called them to inquire about the status of our transfer order. That is when we learned the request was denied, and no explanation was provided,” explained Yahia Chamali, the treasurer for this organization engaged in humanitarian and medical assistance. Tous pour la Syrie never received a written justification for this denial. “While transfer requests are being processed, money is taken out of our account and disappears. The bank is unable to explain to us where the money has gone. We sometimes have to wait several weeks before hearing back from them, and the end results can be either positive or negative. Sometimes the transfer is allowed to go through, and sometimes it isn’t and is re-credited to our account,” explained the president of Syria Charity. Alwane (“colors” in Arabic), an organization supporting Syrian children, once had to wait seven weeks before finding out one of its bank transfers was denied, without any prior notice from the Banque Postale, which failed to provide updates on the transfer’s

“While transfer requests are being processed, money is taken out of our account and disappears. The bank is unable to explain to us where the money has gone.”

status or provide a justification for its cancellation. After six weeks of waiting, engaging in multiple phone conversations with the bank, as well as providing any document that would increase the likelihood of a successful transfer of funds, the organization contacted the bank once again in an attempt to understand the reasons behind the account freeze. “Our banking advisor explained to us that the Banque Postale was not responsible for the account freeze, that an ‘intermediary bank’ was responsible for this situation. The Banque Postale will come back to us, they said, once they have identified ‘new elements’ in the case.” Eight days later, Alwane finally discovered that the bank transfer was denied and the organization had been credited the transfer amount to its account, minus the cost of the transaction funds. After sending a letter requesting that these transaction funds be deposited into their account, Alwane was eventually reimbursed for these costs, without “any further explanations or apologies.”



“Over the course of a year, the Banque Postale refused to share with us its manager’s name.”

Lack of advisor or point person at the banks

Most organizations that have been victim of these types of challenges have made attempts at pro-actively solving the problems at stake, such as trying to contact their banking advisors or their bank’s branch manager to identify possible solutions. However, they have consistently struggled to find an advisor willing to speak with them. “Over the course of a year, the Banque Postale refused to share with us its manager’s name. This person’s identity was finally revealed to us only when the bank decided to close our account. But this was unproductive, as the manager did not provide us with any explanation,” explained Claudine, the treasurer for Women Now for Development.

Nazra and several other organizations also received an account termination letter after the fundraising platform HelloAsso and its partner Lemon Way shut down their account. “We wrote to HelloAsso but they ignored our inquiry by saying that Lemon Way was exclusively responsible for the closure of our account. We therefore tried to write to Lemon Way, but their email box was full, and when we asked HelloAsso to provide us with a different contact at Lemon Way, they refused to do so and simply said they would let Lemon Way know of the problem at stake,” explained Nazra’s president (cf. appendix).

3

The precautionary principle: an excuse to evade monitoring obligations?

Despite consistent silence on the part of the banks, some organizations have been somewhat more successful in managing to receive unofficial explanations from their banking partners. These justifications generally confirm the patterns of discrimination towards Syria-affiliated groups we have observed throughout our research.

As a long-time client at Crédit Lyonnais, the president of Syria Charity, Mohammad Alolaiwy, was thus able break through some of the barriers his colleagues had been facing. “In 20 years, we never faced a single issue with our bank. The director therefore agreed to meet with me as soon as I asked him to,” explained Mohammad Alolaiwy. “While he was not able to provide a written explanation, he confirmed with me that the measures taken by his bank were not specifically directed against the organization. “The decision comes from above. No one wants to hear about Syria,” he told me.

The president of UOSSM heard a similar unofficial explanation. “I have been told the banks are not questioning the quality of our work, our leadership, or our members, but they simply believe these funds are too risky to manage,” explained Dr. Ammar Chaker.

Preventing an organization from opening a bank account, closing accounts, and adding complicated barriers to interna-

tional banking transfers are proving to be very successful strategies to limit the transfer of funds to projects in Syria, and would make it possible for banks to avoid dealing with monitoring responsibilities.

*“The term
‘Syria’
triggers an alarm”*

The two organizations mentioned above are not the only ones with thoughts on the situation. “When Société Générale decided to close down our account in 2015, I asked to meet my banking advisor. We had been on good terms for three years, and we had always been very transparent with him,” explained Nafissa, a member of Initiative for a New Syria (INS). Unfortunately, the advisor made the same statement as those mentioned by the presidents of Syria Charity and UOSSM. In fact, he appears to have gone even further and to have claimed that INS was not the only organization whose account was being shut down without justification. “According to my advisor, the word “Syria” triggers an alarm within the Société Générale,” explained Nafissa, disappointed that INS’ banking advisor’s intervention on the organization’s behalf was not sufficient to prevent their account from being closed.

Several of the organizations who saw their accounts shut down by HelloAsso were not even given enough time to provide documents needed for the authentication process. “We thought we were going to undergo a thorough verification process, which would allow the crowdfunding platform to make sure we were still a legitimate organization and that our supporting documents were authentic. We did not see any issue with this. However, nine days later, before we even had the chance to send all the necessary documents, we received another letter informing us of the immediate closure of our account,” explained Inès, the president of Nazra, an organization providing assistance to families in Syria. UOSSM and Tous pour la Syrie found themselves in a similar situation. Their accounts were closed only two and three days after the organizations received the authentication requests. (Cf. appendix)

Two confessions from employees at HelloAsso and Lemon Way seem to confirm that Lemon Way engaged in discriminatory policy between June and August 2017. After CODSSY’s account was shut down, CODSSY’s manager was able to speak with an advisor at HelloAsso. Their response was final: “Lemon Way decided to close down all the accounts belonging to Syrian organizations.”

*“We refuse to work
with organizations with
links to Syria”*

This answer was later put into writing by a Lemon Way employee in an email sent to the organization Tous pour la Syrie: “We have indeed closed your account as we refuse to work with organizations that have any link to Syria. This decision is final.” This email, written by a certain “Jean-Marie,” seems to lack an understanding of how serious this “zero risk policy” is.

In response, the organization Tous pour la Syrie approached the High Court to report moral and financial prejudice. “Lemon Way agreed to re-examine our records but refused to provide any compensation for the harm caused by their actions. We therefore decided to pursue legal action,” explained Yahia Chamali. “We truly feel discriminated against,” explained Jamil, president of the organization Coeur et Action pour la Syrie. “Lemon Way was fined 80,000 euros for failing to carry out adequate background checks of its clients in April 2017⁶. It seems the group did not wish to take any risks working with organizations like ours,” observed Racha Abazied, president of Syrie Moderne Démocratique Laïque (Syrie MDL).

However, Lemon Way defends its actions, claiming it does not systematically target organizations with links to Syria. “We don’t refuse to work with organizations linked to Syria, but we are taking all necessary precautions. Syria is listed by the public treasury as being a high-risk country in regards to terrorism financing,” explained Antoine Orsini, the Executive Director

⁶ “Lemon Way at fault in its fight against money laundering,” Les Echos, April 19, 2017

of Lemon Way. As a result, collecting donations—the primary purpose of organizations registered on HelloAsso, the crowdfunding platform partnering with Lemon Way—has become very challenging. “These donations only rarely result in the direct purchase of goods or in service delivery, and the anti-terrorism unit Tracfin has asked us to be particularly cautious of activities for which it is difficult to trace the transfer of funds,” explained Antoine Orsini. Lemon Way’s risk evaluation process, which has

recently been revised, could change this status quo, according to the start-up’s Executive director: “We revise our risk classification whenever necessary, and at least once a year. We will examine the situation of every organization that seeks to open an account with HelloAsso this year, basing ourselves off the criteria defined in this classification, just like all of our partners.” CODSSY’s account was thus re-opened in mid-March 2018, a few weeks after the group contacted Lemon Way’s management in the

context of writing this report. Yet CODSSY has not changed the way it operates, and did not send any new documents to Lemon Way since its account was shut down. This shift seems to show that, with only 80 employees and over 10,000 accounts to verify in the space of a few months, CODSSY’s account might have been closed because Lemon Way lacked the resources to properly verify CODSSY’s authenticity, rather than because of a lack of transparency on the organization’s part. However, it is CODSSY alone that has suffered the damage caused by nine months of service interruption.

Lemon Way, however, would not be the only payment processor to have engaged in risk management processes that appear to discriminate against organizations linked to Syria. The Union des Organisations des Secours et Soins Médicaux (UOSSM) faced three rejections over the course of three years from three different payment processing companies. “The first rejection came in 2015

2015: GROWING PRESSURE ON FINANCIAL BODIES

In the context of a growing crackdown on money laundering and terrorism financing, and to promote compliance with American and European embargos on Syria, banks and insurances have increased their background checks since 2015. In 2014, BNP was fined 9 billion American dollars (7,9 billion euros) by American regulators for failure to abide by oversight requirements, and in 2015, the French Prudential Supervision and Resolution Authority (ACPR) and the French Authority for Banks and Insurances, inspected 22 banks and insurances, and an additional 30 in 2016. This led to eleven financial penalties (eight accusations and three warnings), for a total amount of 6,47 million euros. The institutions that were fined include large banks such as the Société Générale, BNP Paribas and Axa France Vie, and, to a lesser extent, new actors such as Lemon Way.



from Sum Up. We were prevented from using their services from the very beginning. Next came HelloAsso and Lemon Way, who decided to close our account very suddenly. Lastly, at the beginning of the year, the English company GoCardless, which we had turned to for the management of our direct debits, also closed our account,” explained Dr. Ammar Chaker, General Secretary of UOSSM. Earlier this year, GoCardless requested authentication documents, and then closed the organization’s account within five days, before the documents could even be provided—just like Lemon Way has done for some of its clients. (Cf. appendix)

In light of these increasing challenges, many organizations are asking themselves: through what framework are they allowed to work and help Syrian civil society? Has the precautionary principle become an excuse used by French financial institutions to evade their legal oversight requirements? Increasing the fight against money laundering and terrorism financing seems to offer two main options to financial institutions: massively invest in their compliance department, to limit flaws within their system; or reduce the margin of error

by refusing to provide their services to humanitarian actors working in Syria, considered to be “at risk” clients, which would ultimately constitute a form of discrimination. “The blockages that these organizations linked to Syria have to face is often immoral,” admitted an employee of a big French bank, on conditions of anonymity. “These organizations are not lucrative clients, and the financial institutions are concerned about profits. Most of these big financial establishments have tight operating costs. We should be able to exert complete financial control, but in fact, this is not the case.”

An article published in December 2017 on the investigative site Les Jours⁷ indicates that the Banque Postale had considered, in 2013, a “software overhaul to fix certain glitches and failures.” But this initiative was ultimately abandoned due to “high costs, estimated between one and two million euros.” These many service refusals, however, have serious consequences: they weaken humanitarian and development projects on the ground and they diminish French, European, and international humanitarian policies.

⁷“At the Banque Postale: an alarm is triggered and the shadow of Damascus is felt,” article published on the website Les Jours, December 18, 2017



PART

II

**An abusive application of the
precautionary principle in
contradiction with France's
interests and the fight against
terrorism in Syria**

Pro-peace and democracy work is threatened

1

The image and reputation of organizations is being jeopardized

Of the various harms experienced by the organizations in this report, they first and foremost mention the damage to their image, their reputation, and finally, to the development of their projects. As donors become aware of these various constraints, they can naturally become fearful.

“Having our account shut down by HelloAsso was very bad publicity for us,” worried Jamil Farah, from Coeur et Action pour la Syrie. In the hope of limiting the damage caused by the account closure, several organizations sent reassuring messages to their donors, in which they explained the prejudice to which they felt victim of; but once the damage is done, it is hard to undo it. “I explained to our donors that, even though we are carrying out higher quality work, that we improved our governance structure, and that we expanded our network of supporters, we still face a growing number of constraints, both in Syria and in France, whereby the discriminatory policies of certain financial institutions are truly making it harder for us to carry out our work. I’m not sure if this message was understood, as no-one got back to me,” explained Majd Massouh, CODSSY’s coordinator. The organization Tous pour la Syrie decided to bring its situation

with Lemon Way to court in an attempt to seek justice. “Beyond the financial setbacks incurred, we decided to approach the High Court to seek recognition for the moral damage that was caused to us,” explained Yahia Chamali. “One could think our account was shut down because we did not respect or abide by the control measures established by the fundraising platform, which is absolutely incorrect. We are not bandits, and we should not let ourselves be mistreated in this way.”

Furthermore, a grave accusation was brought to the attention of Syria Charity’s president. “A banking advisor told one of our donors that our organization was suspected of having dubious connections,” explained Mohammad Alolaiwy. “Unfortunately this was said verbally, and therefore we do not have written proof to pursue justice for this falsity, but we nonetheless asked a lawyer to tackle the situation. It is absolutely unacceptable to spread such grave and incorrect accusations. It is out of the question for us to let go of such an attack on our honor.” How many other vain accusations may have been spread without the organizations concerned being aware? How many donors failed to renew their financial commitments because of fear?

Groups based in France are doing everything they can to help those whose future is uncertain be able to act quickly and effectively. However, having to address various constraints strips them of precious and much needed time to reflect and react. The majority of organizations interviewed claim that they devote twice as much time to administrative and financial management tasks today than they did a few years ago.

Gathering all the necessary authentication documents required by financial institutions, following up on bank transfers to ensure the process is running smoothly, finding a new bank or fundraising platform following the closure of an account... in just a few years, the amount of time dedicated to administrative procedures has more than doubled for most organizations working with Syrian civilian populations. "Our bank requires that we justify all of our expenses with such precision that we are asked to provide explanations for every 20 euros we spend on projects that may cost a total of several hundreds of thousands of euros. It is incredibly difficult to manage, both for us and for the banks," observed Dr. Ammar Chaker, general secretary of UOSSM.

"Our processing time for international transfers has tripled, even quadrupled," added Chamsy Sarkis, the president of ASML/Syria, an organization supporting independent journalists in Syria. Our banking advisor asked us to provide him

with countless documents: summaries of each activity and project, the names of the accounts that we would be transferring money to internationally; they asked us to declare each international transfer ahead of time so that they may be approved, and to send quotes for the purchases we planned to make with these funds..., " listed the organization's president, who only mentioned a few requirements out of a much longer list. "We cannot carry out international transfers online at my bank. Before the surge in the APCR's controls, the bank's director allowed us to send delivery slips by email, but this suddenly became impossible. I then appointed two people to represent me so that I would not be constrained to do each transfer myself." However, once again, this fairly common arrangement was not permitted. "Although I was living in Turkey, the bank required me to travel in person to Paris for each transfer request," continued Chamsy Sarkis. His organization has several important sources of support, both nationally and internationally: it has been financed by the Minister of European and Foreign Affairs, and has been invited to meet with the European Parliament and the United Nations General Assembly. Moreover, the moral integrity of its president, a researcher specializing in genetics at the National Center for Scientific Research (CNRS) for seven years, had never previously been questioned by the bank. "A transfer can take between six to eight weeks, from the time the request is made to when



Schooling of Syrian refugee children in Jordan, August 2016

© Tous pour la Syrie

it is carried out. Sometimes it can take three months and 60 email exchanges for a single transfer,” explained the general secretary of UOSSM. “We are not opposed to rigorous financial controls, but they should be carried out much faster,” continued Ammar Chaker.

While these organizations can resist the pressure, other, smaller organizations are directly limited in their actions by the multiple obstacles they face. “Spending this much time managing the problems created by financial institutions, when we are for the most part volunteers and are very busy with our full-time jobs and projects, is extremely problematic. Most small organizations are not equipped to adequately deal with these challenges,” highlighted Mary Lemeland, from the organization Yalla! pour les enfants. “Time spent dealing with these issues is time that is not spent focusing on our projects,” explained Inès, president of Nazra.

Some projects, however advanced, are sometimes interrupted when bank transfers are cancelled. For instance, when Alwane’s transfer request to the Banque Postale was rejected, their local partner was not able to purchase school supplies for 269 children, as part of a school construction project. Yet supporting education is an essential aspect of the fight against all forms of indoctrination, including terrorism, as children who are deprived of an education are much more vulnerable to exploitation and manipulation.

Well aware of this, the Assad regime as well as terrorist groups in Syria and elsewhere prosper from the population’s illiteracy. Unfortunately, education is one of the sectors most neglected by donors. If the modest funds raised to support education projects cannot reach their beneficiaries, how can humanitarian agencies effectively intervene where they are most needed?

3

There have been significant financial losses

Categorically refusing to provide financial services to organizations has led to major financial losses. When organizations find themselves having to switch banks, they often have no other choice but to settle for more expensive services, both for the management and transfer of funds. Moreover, HelloAsso and Lemon Way's decision to abruptly shut down many organizations' accounts led these groups to lose the funds they had already raised through their online crowdfunding campaign, including monthly donations from donors who had been contributing through an automatic payment system.

A unifying network, the Union des Organisations de Secours et de Soins Médicaux (UOSSM) was leading two very successful fundraising campaigns. "We had managed to fundraise close to 54,000 euros, thanks to the generosity of our community. When our account was shut down, we had to advance the funds to our partners so that they could continue carrying out their mission, as

we waited for these funds to finally be allocated to us," explained Dr. Ammar Chaker. But what would have happened if UOSSM had not had sufficient savings to sustain their projects during this funding interlude? Members of Coeur et Action pour la Syrie, a less high-profile organization, faced a similar situation, and were constrained to delay the building of a school by several months until they were able to receive their donations. "By returning the money we had fundraised to the donors, HelloAsso deprived us of a precious source of funding at a time when we were about to start building a school in Northern Syria. Today, the school that was supposed to open its doors for the 2017-2018 school year is still under construction," lament Jamil Farah, the organization's president. The smaller the organization, the greater the shock when funds are withheld. When it lost four of its ten regular donors, Nazra, a small organization, thus lost 40% of its donor support base, as well as several months' worth of funding.



Construction of a school in the south of Jordan, August 2016

© Tous pour la Syrie

Most of the organizations working to assist the civilian Syrian population were created just after the beginning of the revolution and the outbreak of war in Syria, with the goal of providing what was then thought to be short-term humanitarian assistance. Seven years later, the humanitarian crisis is not only worse than it has ever been, but humanitarian actors have also become targets in Syria and are now being segregated in France. This has had a profound impact on the morale of humanitarian actors.

“We have been fighting to be allowed to operate freely in France for three years, while we are already in a permanent state of struggle against the chaos and the destruction prevailing in Syria,” commented Inès, the president of Nazra. This struggle is made even more difficult by the fact that Syrian humanitarian workers are criminalized and caught in the middle of crossfire. Journalists, professors, doctors, and even artists—all peaceful activists have been targets; the regime regards them as terrorists, and terrorists regard them as enemies.

For medical organizations, the war in Syria presents a particularly new set of challenges. The principles and practices of medical neutrality in armed conflict have been shattered over the last few years. Because of repeated targeting of medical practitioners, medical establishments and ambulances, Syria has become the most dangerous place for health practitioners to operate, according to several organizations. In March 2017, a study by the commission on Syria at the American University in

Beirut, published in the magazine *The Lancet*, stated that “hundreds of health practitioners have died in their attempt to save lives, and hundreds of others have been incarcerated and tortured.”⁸ The situation worsens every day. In January and February 2017, “‘67 verifiable attacks’ were carried out against hospitals in Syria, thus ‘over 50% of verifiable attacks’ for the year 2017, where a total of 112 took place,” according to the World Health Organization.

How can we accept that financial institutions block the actions of civilian humanitarian workers when these actors have relentlessly continued to carry out their humanitarian work, despite the risks involved? “How can we explain to the members of our organizations in Syria that we are unable to pay them or send them enough funds to purchase food or much needed medical supplies, despite the fact they continue to carry out their work under inhumane conditions? Even under siege, with bombs been dropped around them, they are persevering. How do we answer them when they tell us they are hungry, they are scared, and they are horrified at the idea of not being able to complete their mission?” asked Maria al Abdeh, director of Women Now for Development. “All humanitarian actors in Syria are operating under extremely difficult conditions, and every new obstacle can become a serious impediment to groups in France and Syria,” explained Chamsy Sarkis, president of ASML/Syria.

⁸ « Health workers and the weaponisation of health care in Syria: a preliminary inquiry for *The Lancet*—American University of Beirut Commission on Syria», publié le 14 mars 2017

B

Foreign policy towards Syria has been dangerously weakened

1

Humanitarian and development work are of strategic importance in the fight against terrorism

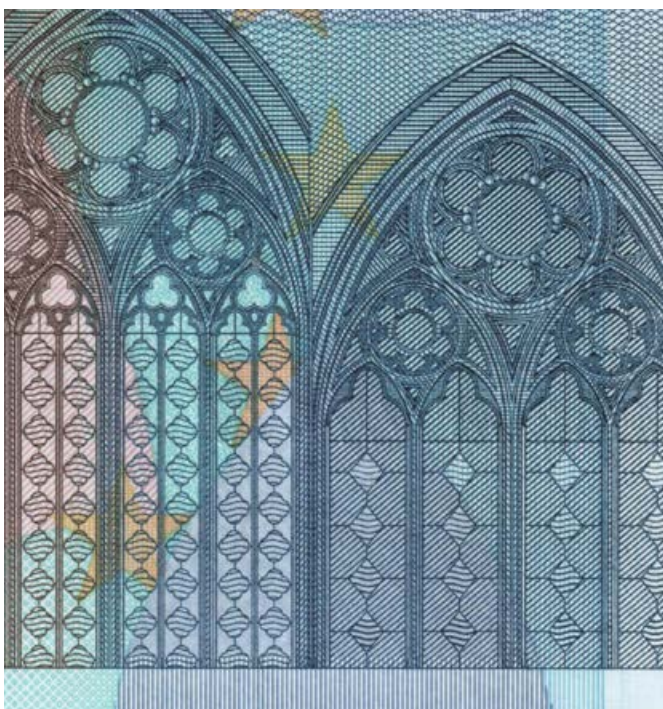
The European strategy for peace in Syria, adopted in March 2015, includes four main objectives, one of which is “to provide humanitarian assistance and international protection to people affected by the conflict.” The European Union, to which France is the second largest financial contributor to the general budget, became the primary financial contributor to humanitarian efforts in Syria and in the region. The EU and its members have contributed over 9,4 billion euros since the beginning of the conflict.

Despite this, banks and other financial actors do not seem to grasp the strategic importance of humanitarian efforts. “Since the surge in banks being convicted for breaching monitoring obligations within the framework of the fight against money laundering and terrorism financing, we receive training every year on restrictions and embargos targeting Syria, Iraq, Iran, Sudan, and North Korea. But we are never explained that humanitarian action is an integral component of this fight,” confided the director of a large French bank, who wishes to “see this component added to the training.”

Legally, the European embargo primarily forbids the import and export of “weapons and technology that can be used for repression; natural resources (gas, oil); chemical products; artwork; and all financial transactions with Syrian banks, including the central bank.” As explained in 2012 by the High Representative of the European Union, Catherine Ashton, the embargo was configured to “target the Syrian regime and not the civilian population.” On April 5, 2017, the EU and international donors committed, once again, to provide generous humanitarian assistance, with a budget of 5,6 billion euros to “meet the enormous needs of Syrians.” Donors pledged 3,47 billion euros in aid for 2018-2020. These commitments, taken at an international conference in Brussels, must imperatively benefit from the assistance of the financial institutions that carry out these transactions in order to be successful.

The same is true of France’s strategy, led by Emmanuel Macron. During his first speech as president at the United Nations, on September 19, 2017 in New York, the French president affirmed: “The Syrian people have suffered enough, and

it's time for the international community to examine its collective failures and rethink its approach. (...) In this context, I have identified two red lines that we will not cross. First, we will be absolutely intransigent on the use of chemical weapons, and second, we deem it absolutely necessary to provide medical care for all, and to allow medical structures to provide for and protect civilian populations." France chose to make these issues top priorities during its presidency at the Security Council. Reaching a political, rather than a military, solution to the conflict is of critical interest not only for the Syrian population, but also for the French population. "Taking action in Syria means taking action for the Syrian people, but it also means protecting ourselves from Islamist terrorism. (...) We must therefore protect ourselves by joining forces," stated Emmanuel Macron at the UN General Assembly. On March 22, 2018, during the fourth National Humanitarian Conference organized by the Ministry of European and Foreign Affairs, the government announced that it would triple its financial engagement to support humanitarian efforts in Syria over the next four years. "Humanitarian action is one of the pillars of our foreign policy," stated Jean-Yves Le Drian, Minister of European and Foreign Affairs. Consequently, France's annual contribution to humanitarian action and crisis stabilization could reach 500 million euros by 2022. This increase in financial commitment is unprecedented in France's recent history. But will this



financial commitment be implemented effectively if financial institutions are encouraged to challenge or even block financial transfers to countries that need it the most, without any cause for concern?

When banks prevent organizations from transferring funds to local partners, it is not only NGOs who lose—French citizens' money is also going to waste. Most of the organizations listed in this report are funded by major donors and public funders, including the French Minister of European and Foreign Affairs, UNICEF, the World Health Organization, the United Nations Office for the Coordination of Humanitarian Affairs, or the European Endowment for Democracy. These public funds are sustained by the French population as well as the European and international ones.

⁹ <http://www.consilium.europa.eu/fr/policies/syria/>

2

Blockages expand across Europe and the Middle East

French financial institutions are not alone in complicating humanitarian action aimed at helping Syrian civilians. We have observed similar blockages in a number of other European countries, particularly in Germany, Belgium, and the United Kingdom, as well as countries hosting the largest numbers of Syrian refugees in the Middle East, such as Lebanon.



United Kingdom: Organizations and individuals subjected to similar blockages



British banks appear to be less and less willing to partner with organizations working in Syria and neighboring countries. The Rethink Rebuild Society carried out a study on this topic in September 2017. It observed that “banks in the United Kingdom denied services to 10 organizations and 35 Syrian individuals.” The blockages were similar to those identified in this report: individuals’ bank accounts were closed without explanation, requests to open new accounts were denied without proper inspection of all application documents, and simple banking transactions, primarily transfers, were made significantly more complex. As for the reasons behind this, it seems the precautionary principle was, once again, at the root of the banks’ motives. Banks mentioned “respect for sanctions and European embargos” as a key reason for denying services to certain organizations and individuals.



Germany: German banks tend to follow in the footsteps of their French and British neighbors

While organizations based in Germany that provide assistance to Syrian civil society were generally able to function until 2014, there has been growing concern among these humanitarian actors in recent years. Out of 23 member organizations of the Union of German-Syrian Organizations (VDSH), over 88% of organizations that transfer money overseas for humanitarian projects experienced financial blockages, according to an internal study carried out by VDSH. The study highlights that these blockages are directly linked to the presence of the term “Syria” or other related terms in the organization’s name, although this is never openly acknowledged. “All of our members struggled to transfer funds to Turkey when they specified the purpose of the transfer would be for humanitarian work in Syria,” explained Lilli Kardouh, CEO of VDSH.

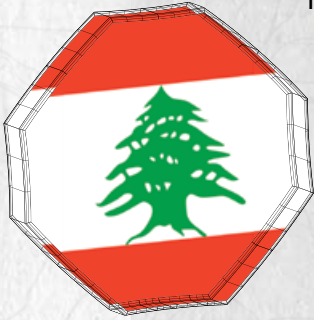
Over time, the presence of the term “Syria” within an organization’s name was enough to ensure transfers would be blocked, regardless of where the funds were being transferred to. Recently, German-Syrian NGOs have experienced banking issues with projects aimed at helping Syrian refugees in Germany. Some organizations have declared that even some of their employees’ private bank accounts have been shut down (this concerns German citizens of Syrian origin). This issue grew to staggering proportions in 2015, when hundreds of thousands of Syrian refugees arrived in Germany. Because of the Syrian embargo, Syrian refugees would often find their request to open a bank account denied. Nowadays, many Syrians in Germany have turned to local, non-profit banks, according to the Union of German-Syrian Organizations.

At the heart of the European system, the situation in Belgium is not any better



Despite what one may think, the situation is just as complex in Belgium, the heart of the European system. Thus, Relief and Reconciliation International (R&R), a humanitarian organization founded in 2012 under the sponsorship of Vice Presidents from the European Parliament and Jerzy Buzek, the Polish former President and member of the European Parliament, has also experienced banking nightmares. The organization saw its bank account abruptly closed down by the Belgian branch of a major French bank. "I contacted the branch's former director, who found the situation shocking, but she was unfortunately unable to do anything about it," said Friedrich Bokern, the NGO's executive director. R&R was subsequently unable to open up a new bank account. "We contacted four banks and all rejected our request without any explanation," explained the director. Transfers from the NGO's Paypal account were also delayed on a regular basis. "We would receive our funds in a completely irregular manner. Half of the transfers from our Paypal account took one to two months before appearing in our bank account," explained Friedrich Bokern. As a result of these complications, the organization was unable to pay its employees' salaries on time or reimburse their employees for work-related purchases. Today, the NGO is called Relief and Reconciliation International and no longer Relief and Reconciliation Syria to prevent discriminatory blockages that they believe occurred because of their organization's name. After four years, the NGO's Lebanese branch was able to open a bank account in Lebanon to support the organization's Peace Center on the Syrian border. The organization's members were eventually able, albeit facing tremendously challenges, to find avenues to transfer private donations from Europe to Lebanon via Paypal.

In Lebanon, mistrust of NGO's work by the financial sector is out of control



In the land of cedar, which shares a border with Syria and is home to over 1.5 million Syrian refugees—one fourth of Syria's total population—the finance sector is openly hostile towards the civilian Syrian population. "It's almost impossible to open a bank account if one isn't connected to the right personal networks that can support one's application, yet it is quite challenging to find the right person who can reassure bankers," explained Fadi Halisso, president of the NGO Basmeh & Zeitooneh. "It was only after we tried eight times, and received the support of the German embassy, that we finally found a bank that accepted to open an account for us!" confirmed Friedrich Bokern, director of the Belgian NGO Relief and Reconciliation International. National and international banking transactions from Syrian NGOs are not treated in the same manner as transactions by Lebanese people. "Transfers are denied as soon as the words 'Syria' or 'Syrian' appear, even if the funds are aimed at refugees in Lebanon," continued Fadi Halisso. Funds sent by foreign NGOs can also be blocked; this situation occurred to Basmeh & Zeitooneh when the Secours Catholique France and Caritas Ireland attempted to transfer funds to the organization but the funds were blocked for a month. Since private donations are also regularly blocked, it has become incredibly difficult for organizations based in Lebanon to function at all. These financial blockages caught the attention of the United States Treasury, which offered to help Basmeh & Zeitooneh if future challenges were to arise, but it is difficult for the organization to accept such an offer. "This is not just a case-by-case problem for which we can appeal to the US Treasury. The entire sector is increasingly hostile to Syrians. The treasury could solve the issue of a frozen bank transfer, but cannot force banks to accept to take on Syrian clients. Syrian individuals and organizations are excluded from the banking sector. This has become one of the sector's greatest flaws," lamented the organization's director, who was eventually able to open a second bank account "just in case the first bank suddenly decides to close our account." A precaution that Fadi Halisso had time to mature during the three years of research needed to find an institution that opens its doors, thanks to the intervention of its support network.

Conclusion

After three months of research, we have identified blockages laid by most financial institutions, targeting a majority of organizations with links to Syria. The evidence we gathered suggests that this is not a sporadic practice, but rather internal policies of financial institutions targeting organizations linked to Syria, and even Syrians themselves. It seems that the strict application of the precautionary principle, imposed by the French government in 2015, has led to measures that are not only dysfunctional but also contradictory to the strategic priorities laid out by Western countries. The recurrent obstacles that Syrian humanitarian civil society organizations are victim of weaken groups that are already criminalized in Syria, and lead to a loss of time and energy that significantly slows down project developments on the ground. Yet education, women's empowerment, freedom of expression, medical assistance, and other humanitarian and development actions are essential components of the fight against all forms of radicalization. Feeding, healing, and educating all help lay the building blocks for tomorrow's peace. Humanitarian projects are not just ethical—they are also strategic. The French government has acknowledged this and is investing heavily in humanitarian and development work, including in Syria. By hindering the work of humanitarian organizations, financial institutions are thus compromising France's strategic interests and are putting French citizens at risk. While Franco-Syrian organizations are paying the cost today, the entire French population will pay the cost tomorrow.

How did we find ourselves in such a situation? At the heart of international financial exchanges, banks and payment processors carry the heavy burden of identifying and preventing fraudulent transactions. This challenge

is particularly monumental and costly today, at a time when the international environment is deteriorating. The multiplication of crises and conflicts, their growing complexity, and their long-term duration are weighing on financial sector actors. Yet their primary objective remains making a profit. Regardless of the quality of the work being carried out by humanitarian organizations on the ground, the cost-benefit analysis of these non-profit clients does not meet the profitability criteria of banks and other financial institutions. The challenges faced by Syria-related organizations raises questions that go beyond their individual interests as organizations. Indeed, our findings raise questions about the system itself. Given the importance placed upon strategic humanitarian action by public authorities, is it wise to put all the responsibility for financial transfers onto commercial companies? How do we ensure that these companies, whose interests are primarily economic, also consider national and international humanitarian and security concerns?

Many humanitarian organizations related to Syria are on the verge of collapse. Humanitarian intervention within Syria as well as in neighboring countries and in Europe is becoming increasingly complex. The various obstacles addressed throughout this study must cease, so that we may all work together to relieve the suffering of the Syrian people.

There are solutions to the problems highlighted in this report. At a time when France is on the verge of becoming one of the top five global financial contributors to humanitarian and crisis stabilization work, by tripling its financial contributions between now and 2022, we urge public authorities (the Ministers of European and Foreign Affairs, the Interior, Economy and Finance, and Defense) as well as financial institutions (French Banking Federation and ACPR) to identify, along with CODSSY and its partners, concrete solutions, and quickly establish an implementation strategy.

Appendices

1-Closure of bank accounts

 **SOCIÉTÉ GÉNÉRALE**
5 RUE SAINT-ANTOINE
75004 PARIS
Tel : 01 44 78 88 40

Fax : 01 48 87 52 37

Agence Paris Bastille

FRANCE

Le 05 avril 2016,

Objet : Clôture de compte en l'absence de concours
Compte n° : [REDACTED]

Lettre recommandée avec AR 1A 126 466 8019 5

Monsieur,

Nous vous informons par la présente que nous avons décidé de procéder à la clôture du compte n° [REDACTED] dont vous êtes titulaire dans notre Agence.

Cette clôture prendra effet dans un délai de 60 jours à compter de la date d'envoi de la présente lettre, soit le 06/06/2016.

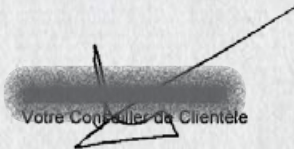
Avant cette date, vous devrez :

- nous avoir restitué tous carnets de chèques et cartes bancaires liés à ce compte, qui seraient en votre possession ou en celle de votre (vos) mandataire(s) ;
- avoir modifié la domiciliation de vos avis de prélèvements et crédits à recevoir.

Passé ce délai, vous ne pourrez plus effectuer aucune opération sur nos caisses.

Nous vous informons que vous avez la possibilité de saisir de votre dossier le Médiateur du Crédit aux entreprises soit par fil au n° Azur 0810.001.210 ou par courriel sur le site Internet : <http://www.mediateurducredit.fr>. Si vous souhaitez avoir recours à cette procédure, nous vous invitons à déposer un dossier sans délai auprès du Médiateur du Crédit.

Nous vous prions d'agréer, Monsieur, l'expression de nos salutations distinguées.


Votre Conseiller de Clientèle



ASS SORIYAT POUR DEVELOPP HUMANI

PÔLE SERVICES CLIENTS PARIS JEMMAPES

SERVICE AUX PARTICULIERS ET AUX PROFESSIONNELS

Le 28 août 2014,

FRANCE

Objet: Préavis de clôture du compte à 60 j

Compte n°: [REDACTED]

Lettre recommandée avec AR 1A 092 053 0096 0

Monsieur,

Nous n'avons plus convenance à maintenir la relation de compte que nous avons avec vous et souhaitons y fixer une échéance prochaine.

Aussi nous vous prions de noter que cette relation de compte prendra fin dans soixante jours, soit le **27/10/2014**, date à laquelle votre compte n° [REDACTED] sera clôturé. Le solde créditeur de votre compte est à ce jour de [REDACTED] Euros, sous réserve des éventuelles opérations en cours.

Nous vous remercions, en conséquence, de bien vouloir prendre toutes dispositions pour que votre compte soit effectivement soldé à cette date, compte tenu, s'il y a lieu, de toutes opérations initiées antérieurement à la clôture, mais qui n'auraient pas encore été passées au débit de votre compte à cette date. Vous aurez à nous restituer les moyens de paiement en votre possession dès la clôture de votre compte.


En outre, nous vous invitons à veiller au changement de vos domiciliations en temps utile.

Je me tiens à votre disposition. Vous pouvez me contacter [REDACTED]

Nous vous informons, par ailleurs, que vous avez la possibilité de saisir de votre dossier le Médiateur du Crédit aux entreprises soit par fil au n° Azur 0810.001.210 ou par courriel sur le site Internet : <http://www.mediateurducredit.fr>.

Si vous souhaitez avoir recours à cette procédure, nous vous invitons à déposer un dossier sans délai auprès du Médiateur du Crédit.

Veillez agréer, Monsieur, l'expression de mes sentiments distingués.

 [REDACTED]
Votre Conseiller de Clientèle

2-Closure of bank accounts by payment processors

Important : renouvellement de votre authentification

HelloAsso <contact@helloasso.com>

Répondre à : HelloAsso <contact@helloasso.com>

À : touspourlasyrie

27 juin 2017 à 18:37

1



Bonjour

Dans le cadre de nos obligations réglementaires, nous avons besoin de réaliser une mise à jour des pièces justificatives de votre organisme.

Après analyse des éléments renseignés, nous avons besoin de pièces complémentaires que nous vous invitons à renseigner dès que possible dans votre espace authentification sur HelloAsso :

- RIB de votre organisme

Les coordonnées bancaires de votre association restent enregistrées avec votre IBAN mais vous devez nous fournir le RIB au nom de votre organisme au format PDF.

- Témoin de publication au Journal officiel

Merci de nous transmettre le témoin de publication de votre organisme au Journal officiel. Vous pouvez retrouver cette information sur le site du Journal Officiel.

- Liste des membres du bureau actuel

Afin d'identifier le mandataire, merci de transmettre la liste des membres du bureau actuel (par exemple : le PV de l'assemblée générale). Attention, si les membres du bureau ont changé depuis votre inscription sur HelloAsso, veuillez à remplacer la carte d'identité renseignée précédemment par celle d'un des membres actuels du bureau.

Nous vous invitons également à vérifier le format des éléments suivants :

- La carte d'identité

Veillez à ce que la carte d'identité renseignée soit celle d'un des membres du bureau actuel. D'autre part, le recto et le verso de la carte doivent figurer au sein d'un même document.

- Les statuts de votre association

Vos statuts doivent également être en un seul document. N'hésitez pas à consulter [cet article](#) pour comprendre comment fusionner vos fichiers PDF.

Afin de réaliser cette mise à jour, nous vous invitons à renseigner dès aujourd'hui ces



2

Bonjour !

Dans le cadre de nos obligations réglementaires, nous devons réaliser un contrôle régulier des organismes collecteurs sur HelloAsso.

Malheureusement, la récente vérification des pièces justificatives de votre organisme par notre partenaire n'a pas permis d'authentifier et valider votre organisme.

Comme détaillé dans les [conditions générales de notre site](#), depuis Juin 2017, l'utilisation du service HelloAsso s'appuie nécessairement sur la création d'un compte de paiement chez notre partenaire LemonWay, qui authentifie les structures collectrices et garantit la traçabilité des paiements.

Notre partenaire a refusé d'ouvrir un compte de paiement pour votre organisme. Les motifs de refus sont à la seule discrétion des équipes de contrôle LemonWay.

Pour des raisons réglementaires, HelloAsso n'est malheureusement pas en mesure

d'accueillir les organismes qui se verraient refuser l'ouverture du compte de paiement par LemonWay.

Nous vous invitons donc à vous tourner vers une autre plateforme de collecte, et nous excusons pour ce désagrément.

L'équipe HelloAsso



HelloAsso, la plateforme pour Agir Ensemble
87 Quai des Queyries, Espace Darwin, 33100 Bordeaux

Contactez-nous - HelloAsso recrute - Retrouvez-nous sur Facebook

Vous ne souhaitez plus recevoir de message de notre part ? [Désinscrivez-vous](#)

[LEMON WAY SUPPORT] - Your request #1001680 has just been updated !

29 juin 2017 à 14:45

3

[Please reply above this line]

Hi touspourlasylie,

Your request (#1001680) has just been updated !

Have a lovely day,

LEMON WAY CUSTOMER SUPPORT

Jun 29, 2:45 PM CEST

Bonjour touspourlasylie,

Merci de nous avoir contactés !

Le wallet a effectivement été fermé à notre intiation car nous refusons de travailler avec des associations qui sont en lien avec la Syrie.

Cette décision est irrévocable.

Nous avons prévenu HelloAsso hier de la fermeture de votre compte.

Je vous souhaite une belle journée,
Jean-Marie

Jun 29, 2:02 PM CEST



LEMON WAY

LinkedInLinkedIn

Lemon Way | Payment Institution for the New Economy

+33 (0) 1 48 18 19 35

14, rue de la Beaune - 93100 Montreuil - France

<http://lemonway.com>

----- Message transféré -----

De [redacted]

Date : 29 juin 2017 à 13:49

Objet : Fwd: [HelloAsso] Objet : Re: Important : renouvellement de votre authentification

Bonjour,

Le compte de notre association «Tous pour la Syrie» sur la plateforme HelloAsso a été désactivé sans qu'on soit prévenu ! HelloAsso rejette la responsabilité sur Lemon way qui a initié la demande.

Ci-dessous la référence que me donne HelloAsso de notre dossier .

Je voudrais que vous clarifiez la situation avec HelloAsso, que notre compte revienne et je reste à votre disposition pour vous fournir tout document nécessaire à l'authentification de notre association. Ci-joint le dernier avis de déclaration au JO

From: [redacted]
Date: 2017-07-13 1:07 GMT+02:00
Subject: Re: Important : Demande de mise à jour de vos pièces justificatives
To: HelloAsso <contact@helloasso.com>

Bonjour,

Je vois sur notre compte et dans ce mail que les statuts sont acceptés ; cependant vous dites que "Les statuts de l'association sont manquants". Merci de nous dire quoi à faire.

Bien à vous,
[redacted]

2017-07-13 0:11 GMT+02:00 HelloAsso <contact@helloasso.com>:



Bonjour !

Dans le cadre de nos obligations réglementaires, nous avons besoin d'une mise à jour de vos pièces justificatives.

Après analyse des éléments renseignés, voici le détail des éléments à compléter au sein de votre [espace Authentification sur HelloAsso](#) :

le document suivant : **PV de la dernière AG** est: **Accepté**

le document suivant : **Copie de l'autorisation de l'association** est: **Accepté**

le document suivant : **RIB** est: **Accepté**

le document suivant : **Statut de l'association** est: **Accepté**

le document suivant : **Carte d'identité** est: **Document mis en attente après vérification (en attente d'un autre document, ou en attente d'autre information)**

commentaire: Les statuts de l'association sont manquants, merci de les fournir

Afin de réaliser cette mise à jour, nous vous invitons à renseigner dès aujourd'hui ces éléments directement dans [votre espace](#). Pour vous guider au mieux dans cette

Subject:[HelloAsso] **Objet :** Re: Important : vos pièces justificatives ne permettent pas d'authentifier votre organisme
Date:Wed, 05 Jul 2017 12:29:27 +0000
From:Hélène (HelloAsso) <support@helloasso.zendesk.com>
Reply-To:HelloAsso <support+id74090@helloasso.zendesk.com>

-- SVP n'écrivez pas sous cette ligne --

Votre demande (74090) a été mise à jour. Pour ajouter des commentaires supplémentaires, répondez à cet e-mail.

Hélène Hélène (HelloAsso)

5 juil. 14:29 CEST

Bonjour,

effectivement, Lemonway a un problème de mail. Je leur communique ce problème mais je n'ai aucun autre contact à vous donner.

Les motifs de refus de création de comptes de paiement (mais aussi les refus d'authentification) sont uniquement à la discrétion des équipes de contrôle de LemonWay. Helloasso n'est donc pas en mesure de vous apporter de réponse à ce sujet.

Pour des raisons réglementaires, HelloAsso n'est malheureusement pas en mesure d'accueillir les organismes qui se verraient refuser l'ouverture du compte de paiement par LemonWay.

Nous vous invitons donc à vous tourner vers une autre plateforme de collecte, et nous excusons pour ce désagrément.

Bien cordialement,

Chargée de relation utilisateur

Email : contact@helloasso.com

<http://www.helloasso.com>

Consultez nos [Questions fréquentes](#)



4 juil. 14:32 CEST

Bonjour

merci pour les coordonnées de Lemonway mais leur email ne fonctionne pas (voir mail ci-dessous)

Pourriez-vous me transmettre un autre mail ou téléphone qui fonctionne ?

Cordialement

----- Original Message -----

Subject:Undelivered Mail Returned to Sender

Date:2017-07-03 23:17

From:MAILER-DAEMON@out6.mail.ovh.net (Mail Delivery System)

To:

This is the mail system at host out6.mail.ovh.net.

I'm sorry to have to inform you that your message could not be delivered to one or more recipients. It's attached below.

For further assistance, please send mail to postmaster.

If you do so, please include this problem report. You can delete your own text from the attached returned message.

The mail system

<reclamation@lemonway.fr>: host p19.mail.ovh.net[213.186.33.220] said: 550

sorry, user over quota [mail347] (#5.1.1) (in reply to RCPT TO command)

On 2017-07-03 14:22, Hélène (HelloAsso) wrote:

From: [REDACTED]
Date: 2018-01-30 12:31 GMT+01:00
Subject: Très urgent : [GoCardless] Re: Fermeture de votre compte GoCardless
Cc: [REDACTED]

Bonjour [REDACTED]

Nous avons une grosse urgence. GoCardLess vient de fermer notre compte et a stoppé les abonnements pour le prélèvement automatique sans nous fournir de détails sur les raisons de la fermeture.

Que pouvons-nous faire ? L'action semble irréversible ? est-ce possible de trouver une solution ?
Avez-vous un autre partenaire pour les prélèvements automatiques ?

Merci par avance de votre réponse.

----- Message transféré -----

De [REDACTED]

Date: 30 janv. 2018 12:22 PM

Objet: [GoCardless] Re: Fermeture de votre compte GoCardless

A: [REDACTED]

Cc: [REDACTED]

##- SVP n'écrivez pas sous cette ligne -##

Your request (363609) has been updated. To add additional comments, reply to this email.

Bonjour,

Merci pour votre e-mail.

Nous vous remercions de nous avoir fourni de plus amples renseignements concernant l'état de votre organisation et d'avoir fourni des informations supplémentaires aux agents de contrôle. Malheureusement, nous ne sommes pas en mesure de reconsidérer notre décision à cette occasion.

En tant qu'Établissement de paiement agréé réglementé par le Financial Conduct Authority (Fca), nous sommes tenus d'effectuer un certain nombre de contrôles et de vérifications afin de traiter les paiements en votre nom. Après notre examen et évaluation des informations fournies et obtenues dans le cadre de votre inscription, nous n'avons pas été en mesure d'effectuer toutes les vérifications requises avec un résultat satisfaisant – par la suite, votre compte a été fermé et aucun autre paiement ne sera traité par GoCardless.

Pour des raisons de sécurité, nous ne pouvons malheureusement pas fournir d'autres informations quant à la raison exacte pour laquelle votre inscription a été refusée. Nos équipes d'assistance n'ont aucun contrôle sur cette décision et nous ne pouvons pas fournir d'autres informations par téléphone. Nous nous excusons pour toute difficulté occasionnée.

Cordialement,

Équipe De Vérification Des Comptes
GoCardless

29 janv. 14:32 GMT

Bonjour,

Nous venons de recevoir votre notification de fermeture de compte. Nous sommes assez surpris. Nous nous excusons, nous n'avons pas pu répondre tout de suite à votre mail du 24 janvier. Suite à quelques soucis de santé, je n'avais pas pu suivre le sujet.

Je reviens vers vous afin de faire le point en espérant que nous pourrions rouvrir rapidement le compte gocardless :

Notre numéro de SIRET [REDACTED]

AAVS est l'ancien nom de notre association qui est devenu UOSSM France. Vous aurez tous les éléments en pièce jointe attestant de ce changement de nom agréé par la préfecture.

Les donateurs font un don à l'UOSSM France qui est le nouveau nom de notre association.

Voici les noms des membres du bureau :

3-Rejection of transfers abroad

De [REDACTED]
À [REDACTED]
Envoyé : mardi 3 octobre 2017 à 11:06:32 UTC+2
Objet : Re: RE:Virement HRJ

[REDACTED]
Dommage que tu n'as pas pu assister à la conférence de vendredi 22/9. J'avais fait avec la journaliste [REDACTED] une restitution du projet. Ci joint un article Ouest France sur ce projet qu'on mène depuis 2 ans.

J'ai beaucoup de documents et de justificatifs sur ce projet, je propose de faire une réunion téléphonique + partage d'écran de mon ordinateur via un lien internet (je peux m'occuper de l'organisation) avec la personne de CASA ou toute autre entité inquiétée, où je pourrai cibler les réponses avec les preuves à l'appui.

Pour les questions posées ici :

1) Notre contrat de construction d'école est avec l'association jordanienne [REDACTED]. Ci joint la convention signée en 2016.

HRJ est une branche de l'internationale NGO "Mercy Corps" [REDACTED] gère actuellement l'école existante. Nous avons profité de la présence de Catherine [REDACTED] sur place pour nous acheter les équipements dont je t'ai fourni les factures.

Pour info, Catherine est britannique dont le mari est un employé de l'ONU en Jordanie. Ci joint son identité

2) Ci joint le document de suivi des paiements (fichier excel) de ce projet dont le cout est de 26k€. L'association Jordanienne [REDACTED] ne pouvait pas recevoir un virement bancaire extérieure, nous étions obligé d'envoyer des fonds par Western union, en cash avec les membres qui ont fait 4 voyage de suivi de projet ou payer directement le promoteur ou l'intermédiaire [REDACTED] qui nous a acheté les équipements)

3) Ci joint les statuts de TPLS de 2013, où nous avons changé le nom en supprimant le mot collectif qui était dans le nom de l'association. Nous avons également mené la démarche auprès de l'administration fiscale française pour être reconnu d'utilité général ce qui nous permet de délivrer un reçu fiscal à nos donateurs.

4) L'association [REDACTED] est asso jordanienne basée à Azraq et qui travaille pour le développement sociale envers les familles à Azraq. Avec l'arrivée des réfugiés syriens dans la ville d'Azraq, elle s'est investi dans l'accompagnement des enfants, d'où le projet d'école. Ci joint le document de son enregistrement auprès du ministère de développement social (en arabe)

5) TPLS ne reçoit pas de fond de la Syrie. Je ne vois pas qui dans ce pays ruiné pourrait nous donner !
Voici l'origine du financement du projet :

Recettes de financement de la phase 1+ une partie de la 2 en 2016

Objet : Réponse du Crédit Agricole [2095536-1518514628]

De : Credit Agricole Rennes Maurepas (rennesmaurepas@ca-illeetvilaine.fr)

À : [REDACTED]

Date : Mardi 13 février 2018 12h13

Nous vous remercions de ne pas effacer la référence dans l'objet du message afin de faciliter nos futures correspondances.

[REDACTED]

Le virement a été rejeté soit de la part du Crédit Mutuelle soit de la part de l'association nous n'avons pas plus d'informations.

Nous vous invitons à contacter le bénéficiaire pour avoir plus d'informations.

Bien cordialement.

[REDACTED]

Crédit Agricole Ille-et-Vilaine - Tél : 02 99 36 37 77



Avant
d'imprimer,
pensez à

Découvrez l'application Ma Banque



- MES COMPTES, toutes vos informations utiles en un coup d'œil
- MON BUDGET, pour suivre et maîtriser vos dépenses
- MA BANQUE, parce que la relation de proximité fait partie de nos priorités
- MES PROJETS, pour être sûr d'atteindre vos objectifs

En savoir plus

l'environnement. Crédit Agricole, acteur du développement durable.

Rappel de votre message :

Bonjour, J'ai effectué le virement de 3600E depuis le compte de l'asso "Tous Pour la Syrie" [REDACTED] vers l'asso [REDACTED]. Ce jour (13/02/18) le virement est retourné sur notre compte. Pouvez vous me donner le motif ? Merci/yahia chamali : trésorier TPLS

4-Refusal to open bank accounts

From: [REDACTED]
Date: 2018-02-23 13:11 GMT+01:00
Subject: Re: UOSSM France >> Documents officiels
To: [REDACTED]
Cc: [REDACTED]

Bonjour,
Lors de notre entretien téléphonique de ce vendredi 23 janvier à 11h, vous avez exprimé votre refus d'ouvrir un compte bancaire pour notre organisation chez votre établissement. Les éléments de refus que vous avez mentionnés sont :

- Vous êtes une banque de gestion d'actifs. Vous attendez à avoir une somme minimale de 2MM€ placée en permanence.
- La localisation géographique de nos activités dans une zone à haut risque vous effraie

Il est tout à fait de votre droit de refuser de rentrer en relation avec nous. Néanmoins, et compte tenu que les éléments que je vous ai donnés lors de notre entretien le 31 janvier ne sont pas différents des documents que j'ai fournis, nous aurions aimé avoir votre refus plus tôt. Cela aurait économisé une perte de temps inutile pour nous comme pour vous. Cependant, je note que vous avez donné votre réponse dans le délai de 15 jours que vous avez annoncé.

Nous vous remercions d'avoir étudié notre demande et manquerons pas de partager toute information dans le but d'éviter à d'autres la perte de temps que nous avons subi.

Bien cordialement

[REDACTED]
UOSSM.fr

2018-02-23 10:10 GMT+01:00 [REDACTED]
Cher Monsieur,

From: [REDACTED]
Date: 2018-02-22 22:55 GMT+01:00
Subject: Re: UOSSM France >> Documents officiels
To: [REDACTED]
Cc: [REDACTED]

Bonjour [REDACTED]

Comme convenu dans notre conversation téléphonique, je vous envoie en document joint la macro estimation prévisionnelle de notre capacité de placement durant les 24 prochains mois. J'ai pris une hypothèse, peu probable, où certains financements ne seraient pas reconduits, ce qui explique une baisse vers la fin 2019 début 2020.

Concernant le virement, nous avons 2 types :

- Achats de médicaments et de matériel médical auprès des fournisseurs en Turquie. ça représente 30% du total, sur peu de nombre de virement, moins de 1/mois
- Paiement de salaires et frais de fonctionnement de nos projets. Destiné à notre compte bancaire
 - Soit en Turquie à la Banque Ziraat (qui se traduit par Crédit Agricole) [REDACTED]
 - Soit à Erbil dans la région autonome de Kurdistan Irakien. Nous sommes à la recherche d'un établissement bancaire.

à Erbil, plusieurs banques sont possibles :

1. Regional Trade Bank
2. International Development Bank For Investment And Finance
3. Kurdistan International Bank

Et d'autres. Nous sommes en train de voir laquelle est plus efficace.

Je vous confirme notre RdV téléphonique de ce vendredi à 11h.
N'hésitez pas à revenir vers moi avant notre appel si vous avez besoin de toute information complémentaire.

Cordialement
[REDACTED]
UOSSM.fr

Bonjour,

Je viens de déposer dans le même répertoire 2 documents supplémentaires :

12. fichier : 2016.06.09-[REDACTED]

13. Email : 2016.01.14-[REDACTED]

N'hésitez pas à revenir vers moi pour tout complément

Cordialement

[REDACTED]
uossm.fr

2018-02-07 19:22 GMT+01:00 [REDACTED]

Bonjour [REDACTED]

Nous vous remercions de nous avoir reçu vendredi.

Comme convenu lors de notre réunion, merci de trouver sur ce lien les documents officiels vous permettant d'avoir une idée claire sur nos activités, notamment sur le plan financier :

UOSSM-France-Doc Officiels

Ces documents sont:

1. Parution dans le journal Officiel
2. Partenariat avec [REDACTED]
3. Partenariat avec [REDACTED]
4. Récépissé de la préfecture
5. Rapport d'Audit du plus grand bailleur de fond de l'état [REDACTED] GIZ.
6. Procès-Verbal de la dernière Assemblée Générale nommant les dirigeants
7. 6 rapports d'audit concernant notre partenariat avec [REDACTED]
8. Rapport d'Audit globale de la société Deloitte
9. Bilan Comptable 2016
10. Bilan Comptable 2015
11. Etat du compte au 30/01/2018. Merci de noter qu'un virement du [REDACTED] a été validé par [REDACTED] et sera versé dans notre compte dans les jours qui viennent. J'ai posé la question à notre équipe en Turquie pour savoir s'ils avaient d'autres éléments susceptibles de nous intéresser. Je vous les transmettrai si je reçois quelque chose.

Enfin, vous trouvez d'autres informations sur le côté humain et humanitaire de nos activités sur notre site www.uossm.fr

Je reste à votre disposition pour tout complément.

[REDACTED]

This message has been sent by ABN AMRO Bank N.V., which has its seat at [Gustav Mahlerlaan 10 \(1082 PP\) Amsterdam, the Netherlands](#), and is registered in the Commercial Register of Amsterdam under number 34334259.

Le présent message est envoyé par ABN AMRO Bank N.V., dont le siège social est situé au [10 Gustav Mahlerlaan, 1082 PP Amsterdam, Pays-Bas](#), et est inscrite au registre du commerce d'Amsterdam sous le numéro 34334259.

Franco-Syrian organizations interviewed	Organizations facing financial blockages	
AlBeer Humanity France		
Union des Organisations de Secours et Soins Médicaux (UOSSM)	x	
Association de Soutien avec le Peuple Syrien (ASPS)	x	
Syrian Expatriate Medical Association (SEMA)	x	
Association de Soutien aux Médias Libres (ASML/Syria)	x	
Collectif de Développement et Secours Syrien (CODSSY)	x	
Comité d'Aide humanitaire au Peuple syrien (Comsyrr)	x	
Cœur & Action pour la Syrie	x	
Alwane	x	
Nazra	x	
Life 4 Syria (L4S)	x	
Yalla ! pour les enfants	x	
Initiative for a New Syria (INS)	x	
Syrie Moderne Démocratique Laïque (Syrie MDL)	x	
SOS Syrie Nancy	x	
Syria Charity	x	
Centre syrien de médias et de la liberté d'expression (SCM)	x	
Women Now for Development	x	
Tous pour la Syrie	x	
Syrians & Friends Paris	x	
Radio Rozana	x	
Alpes Maritimes Syrie	x	
Liberté Syrie 29	x	
Energy Development Ecology	x	
Medina	x	
TOTAL : 25 organizations (100%)	24 (96%)	

	Categorical refusal to provide services			Delay/ rejection of transfers abroad	Refusal of private donations
	Closure of bank accounts	Refusal to open bank accounts	Closure of bank accounts by payment processors		
		X	X	X	
	X				
	X			X	
				X	
	X		X		
	X				
			X	X	
				X	
			X	X	
	X	X		X	
	X		X		
	X				
			X		
		X		X	
	X			X	X
				X	
	X	X		X	
			X	X	
	X			X	
		X		X	
	X	X		X	
		X		X	
				X	
			X	X	
11 (44%)		20 (80%)	8 (32%)	18 (72%)	1 (4%)

List of associations interviewed

In alphabetical order :

- ALPES MARITIMES SYRIE.
- ALWANE.
- ASSOCIATION MÉDICALE DES EXPATRIÉS SYRIENS.
- ASSOCIATION MEDINA.
- ASSOCIATION DE SOUTIEN AVEC LE PEUPLE SYRIEN.
- ASSOCIATION DE SOUTIENS AUX MÉDIAS LIBRES (ASML/Syria).
- ALBEER HUMANITY FRANCE.
- BASMEH & ZEITONEH.
- CARE FRANCE.
- CENTRE SYRIEN DE MEDIAS ET DE LA LIBERTE D'EXPRESSION.
- CCFD-TERRE SOLIDAIRE.
- CŒUR ET ACTION POUR LA SYRIE.
- COLLECTIF DE DÉVELOPPEMENT ET DE SECOURS SYRIEN.
- COMITE D'AIDE HUMANITAIRE AU PEUPLE SYRIEN.
- ENERGY DEVELOPMENT ECOLOGY.
- INITIATIVE FOR A NEW SYRIA.
- LIBERTÉ SYRIE 29.
- L4S.
- NAZRA.
- ROZANA FOR MEDIA.
- RELIEF & RECONCILIATION INTERNATIONAL.
- RETHINK REBUILD SOCIETY.
- SOS SYRIE NANCY.
- SYRIA CHARITY.
- SYRIANS & FRIENDS PARIS SFP.
- SYRIE MODERNE DEMOCRATIQUE LAÏQUE.
- TOUS POUR LA SYRIE.
- UNION DES ASSOCIATIONS GERMANO-SYRIENNES (VDSH).
- UNION DES ORGANISATIONS DE SECOURS ET SOINS MÉDICAUX.
- WOMEN NOW FOR DEVELOPMENT.
- YALLA ! POUR LES ENFANTS.

Writing and visualization of data: Laurence Bondard

Graphic design: Anmar Nabolsy

Printed in April 2018

Contact: info@codssy.org

Syrian Network for Relief and Development (CODSSY)

Created in 2012, CODSSY is a collective of associations whose common goal is to practice solidarity with the victims of the Syrian conflict, regardless of their ethnic or denominational background. It is a platform for advocacy, cooperation and pooling of resources.

ASML/ Syria

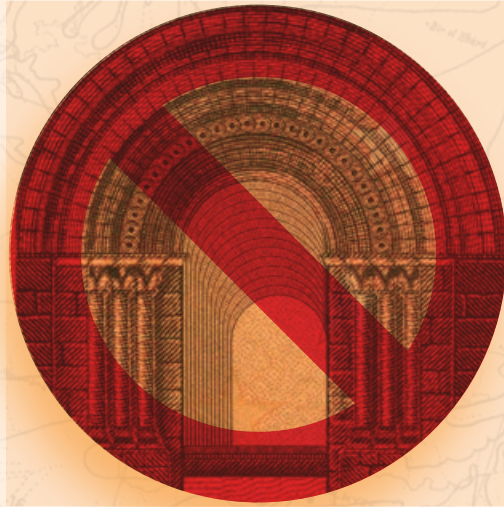
Established by Syrians and for Syrians, ASML/Syria pioneer media solutions to the humanitarian and social consequences of the conflict. The organization aims to alleviate the suffering of the population while building the pluralistic foundation for a peaceful and democratic future.

Initiative for a New Syria (INS/Syria)

Founded in September 2012, INS supports local humanitarian initiatives in Syria, promotes coexistence among the different components of Syrian society, defends human rights, women's empowerment and supports the social and economic reconstruction of the country, including the establishment of the rule of law.

Women Now for development

Created on June 2012, Women Now For Development promotes women's empowerment. The association promotes programs, led by Syrian women, that aim to protect women and children, enable them to take their place in politics and participate in building a new peaceful Syria that respects and protects human rights of all its citizens.



مبادرة سُورِيا جديدة

INS
INITIATIVE FOR A NEW SYRIA



ASML / SYRIA
INFORM | ENGAGE | EMPOWER