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The Charities of Hamas – Designations History and Policy Recommendations

By

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Introduction

It has now been more than two years since Hamas's deadly attack in Israel. As someone who worked for more than a decade in the United States Government (USG) as head of the State Department's Counterterrorism Bureau's Office of Counterterrorism Finance and Designations CT/CTFD, I wanted to reflect on the financial methods, with a specific examination of charities¹, that Hamas has used to finance itself. My views of Hamas's financing activity are indelibly shaped by my own experiences of leading (between 2008-2018) CT/CTFD's efforts to counter the financing of Hamas by using the Secretary of State's Executive Order 13224 authorities to counter, by designating them as terrorists, leadership figures of this deadly terrorist group. Among those we sanctioned as terrorists were leaders and architects, such as Muhammed Deif, Yahya Sinwar, and Ismail Haniyeh², of the October 2023 attack.³

Designating figures within Hamas was never easy while I was in the USG. Often, the geographic bureau, Near Eastern Affairs, or U.S. overseas components,⁴ objected to the CT Bureau's (and Treasury Department) plan to designate individuals associated with Hamas. Concerns chiefly centered on the impact such designations would have on achieving a two-state diplomatic solution between Israel and the Palestinians. Of course, this was a rational concern given that Hamas was the center of gravity in Gaza. Nonetheless, the figures, Deif and Sinwar in particular,

¹ Research for this paper was completed in early March 2026 and takes into account U.S. government designations of Hamas charities until late February 2026.

² Sinwar and Deif were designated in 2015 and Haniyeh in 2018. It is important to note that the State Department has designated several other members of Hamas, as has the Treasury Department.

³ U.S. Department of State. "Individuals and Entities Designated by the State Department Under E.O. 13224." Found at: <https://www.state.gov/executive-order-13224/#state>. Accessed on February 16, 2026

⁴ Such as concerns emanating from an Embassy or Consulate



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should not have been controversial. Ultimately, we were able to designate them and CT/CTFD's engagement with the Israeli government was helpful in gaining support from apprehensive USG agencies.

In my time working at CT/CTFD, we developed a robust relationship with the Israelis, including engagements with the Embassy of Israel in Washington DC as well as bilateral dialogues in Jerusalem with a range of terrorist financing experts from a broad stratum of Israel's government. One thing that always struck me, however, during the 2015-2018 time period was the nearly myopic focus of the Israeli government on Lebanese Hizballah (LH). During all of our bilateral meetings in Israel the bulk of the focus was on the LH-Iran financing nexus. Hamas was always an afterthought. While LH, no doubt, has always been the more sophisticated actor, I do think the stilted nature of the conversations was reflective of the fact that Hamas was more of a talking point than a priority for the Israelis. Of course, hindsight is 20/20 in the wake of the October 2023 attack.

Despite the deemphasis of Hamas relative to LH, countering the financing of Hamas mattered to the Israelis, and to the U.S. government. For example, I led the CT Bureau's efforts at the Gaza Counter Arms Smuggling Initiative (GCASI) to gain traction in getting the Europeans to do more against Hamas-linked charities operating in Europe's backyard. GCASI never netted a clear success, such as the Europeans designating the Hamas-backed charity the "Union of Good" as a terrorist group. Still the information exchange at GCASI was invaluable. However, GCASI became dormant in late 2012 due to a spike of violence between Israel and Hamas.⁵

Any two-state solution must address head-on the financing of Hamas, especially as future financial support flows into Gaza and the West Bank. This should be done through an examination of Hamas's financial activities through the terrorist financing framework I discuss in Terror Disrupted.⁶ The graphic below⁷, from Terror Disrupted, reflects this framework.

⁵ The military operation was known as "Pillar of Defense", where the Government of Israel targeted several high-level members of the militant wing of Hamas.

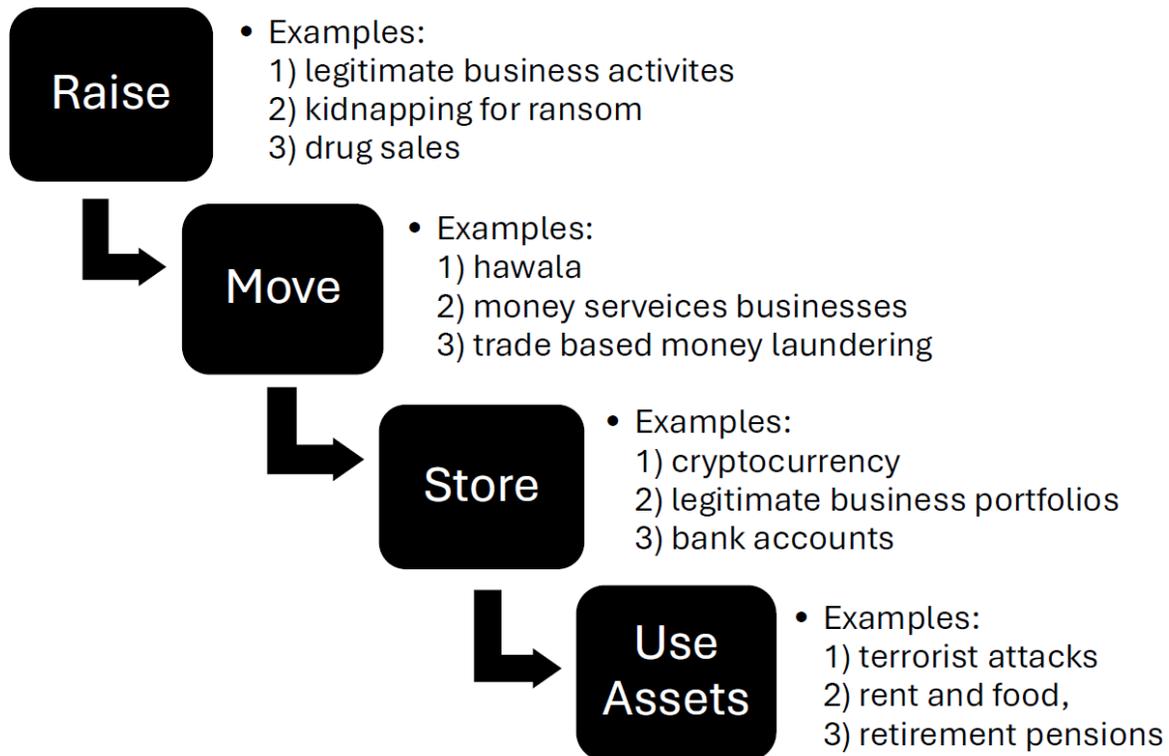
⁶ Jason Blazakis. Terror Disrupted: Countering the Financing of Terrorism. Cambridge University Press. January 2026. <https://doi.org/10.1017/9781009232838>

⁷ Ibid.



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In the lead-up to the October 2023 attack, one of the core areas of Hamas financing was its deployment of a sophisticated charitable network. Charitable giving is the core focus of this paper, and it is vital source of the ‘raise’ framework that has allowed Hamas to use its assets to carry out operations and administrative activity. The final portion of the paper examines modest policy options that the United States should pursue to stifle Hamas financing.

II. Charities

Since October 7, 2023, Hamas financing has been discussed in two competing ways: either as a shadowy, almost limitless pool of money, or as a fragile set of streams that can be shut down with a few designations. The reality is more mundane and more challenging. Hamas has relied on a diversified portfolio of revenue sources—state support, taxation and service fees in Gaza, investment and commercial networks, donor and charitable diversion, and an expanding set of online fundraising techniques, including some experimentation with virtual assets. That



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diversification creates resilience.⁸ Hamas is not an ordinary illicit finance target. It is simultaneously a political movement, a social services provider, an armed group, and - at various points in Gaza's recent history - a de facto governing authority. Those roles shape how it finances itself. A diversified funding model is not incidental; it is a survival strategy designed to reduce dependence on any single donor, jurisdiction, or financial rail. Indeed, public reporting after October 7 reinforces this picture, a patchwork ecosystem that includes direct and indirect support, international facilitation networks online fundraising, and very importantly charity diversion.⁹ It is this latter mechanism, charitable financing, that is the focus of this paper. Indeed, this historic source of financing is even more important now that the United States and Israel launched an attack against Iran, a state patron of Hamas, on February 28, 2026.¹⁰ Iran is now at its weakest point since the Iranian revolution and its ability to finance Hamas is constrained. This coupled with any future rebuild of Gaza, which will unquestionably rely upon foreign assistance and support from charities and non-profit organizations, makes it more important to examine Hamas historical use of charities as a mode of finance.

The charities of Hamas have long been a focus of the United States Government. Indeed, the U.S. Department of the Treasury has sanctioned dozens of Hamas-linked charities since the adoption of Executive Order 13224, signed by President George W. Bush in the wake of al-Qa'ida's September 11, 2001 terrorist attack against the United States.

The modern U.S. sanctions record on Hamas-linked charities begins with Treasury's August 22, 2003 designation of five Europe- and Lebanon-based charities as SDGTs. Treasury described these organizations as part of Hamas's funding network in Europe and moved alongside listings of senior Hamas leaders, signaling that the charity layer was being treated as integral—not

⁸ Kimberly Donovan, Maia Nikoladze, Ryan Murhpy, and Alessandra Magazzino. "Global Sanctions Dashboard: How Hamas Raises, Uses, and Moves Money. Atlantic Council.

<https://www.atlanticcouncil.org/blogs/econographics/global-sanctions-dashboard-how-hamas-raises-uses-and-moves-money/> Accessed on February 16, 2026

⁹ Matthew Levitt, "Combating the Networks of Illicit Finance and Terrorism," testimony/report, The Washington Institute for Near East Policy (submitted to U.S. Senate Banking Committee), October 26, 2023. https://www.banking.senate.gov/imo/media/doc/levitt_testimony_10-26-231.pdf. Accessed on February 16, 2026.

¹⁰ The Center for Preventive Action, "Iran's War With Israel and the United States," March 2, 2026. Council on Foreign Relations. <https://www.cfr.org/global-conflict-tracker/conflict/confrontation-between-united-states-and-iran#:~:text=On%20February%2028%2C%20the%20United%20States%20and,killed%20Iranian%20Supreme%20Leader%20Ayatollah%20Ali%20Khamenei>. Accessed on March 6, 2026.



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incidental—to Hamas’s operational architecture.¹¹ The following charities were designated by the Treasury Department pursuant to E.O. 13224:

- Comite de Bienfaisance et de Secours aux Palestiniens (CBSP) – France
- Association de Secours Palestinien (ASP) – Switzerland (related to CBSP)
- Palestinian Relief and Development Fund (Interpal) – United Kingdom
- Palestinian Association in Austria (PVOE) – Austria
- Sanabil Association for Relief and Development – Lebanon

Partner-government alignment varied, but at least some U.S. allies subsequently adopted parallel measures. For example, open-source reporting noted Australia followed the U.S. designations of the 2003 charity targets.¹²

In November 2008, Treasury designated the Union of Good, an umbrella network that Treasury described as created by Hamas leadership to transfer funds to Hamas. This was a strategically important move: rather than chasing one charity at a time, Treasury targeted an umbrella structure that coordinated fundraising and project execution across multiple member organizations.¹³

The Union of Good designation also created downstream compliance pressure on member or affiliated charities. In the United Kingdom, for example, Parliament’s research briefing summarizing the UK’s Charity Commission inquiries reported that Interpal was ordered to end its relationship with the Union of Good, even as UK regulators did not mirror U.S. terrorism-listing determinations.¹⁴ Indeed, the author, while working as the State Department’s head of CT/CTFD worked through the auspices of the Gaza Counter-Arms Smuggling Initiative (GCASI) as part of an effort to convince European countries to use their own legal authorities to label the Union of Good a terrorist charity. Not one country took the initiative, however, in part because of hopes that Hamas would somehow become part of a two-state solution. The UK maneuver to also allow the Charity Commission to lead an investigation of the Union of Good is

¹¹ U.S. Department of the Treasury, “U.S. Designates Five Charities Funding Hamas and Six Senior Hamas Leaders as Terrorist Entities,” press release, August 22, 2003.

¹² Matthew Levitt, “U.S.-Designated Hamas Front Gets Symbolic Win in France,” The Washington Institute for Near East Policy, March 20, 2007 (noting Australia followed U.S. designations of the 2003 charity targets).

¹³ U.S. Department of the Treasury, “Treasury Designates the Union of Good,” press release HP-1267, November 12, 2008

¹⁴ UK House of Commons Library, “Interpal,” Research Briefing SN06778, December 12, 2013 (summarizing Charity Commission inquiries and noting Interpal’s continued U.S. designation and requirement to end links with Union of Good). <https://commonslibrary.parliament.uk/research-briefings/sn06778/> Accessed on March 16, 2026



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also a positive step; one, as discussed in the conclusion of the paper, that may be important to replicate during any rebuilding of Gaza.

The U.S. Department of the Treasury returned to countering the illicit financing of charities in October 2012, designating two Lebanon-based entities it described as Hamas-controlled charities: Al-Quds International Foundation and Al-Waqfiya Al-Ri'aya Al-Usra Al-Filistinya Wa Al-Lubnanya. Treasury's framing was notable for its emphasis on control and direction—treating these charities not merely as sympathetic fundraisers but as extensions of Hamas's apparatus.¹⁵

Following the 2012 designations, there was hiatus of USG-related designations related to Hamas charitable activity. In part, this can be explained by Obama and Biden Administration concerns related to the application of terrorist designations against the de facto governing body (Hamas) in Gaza. That apprehension, however, dissipated in the wake of Hamas's deadly October 7, 2023 terrorist attack.

After October 7, 2023, Biden's Department of the Treasury issued multiple tranches of designations against Hamas's financial network. For the charitable sector specifically, an October 7, 2024 tranche highlighted "sham & front charities" and designated the Italy-based Associazione Benefica di Solidarietà con il Popolo Palestinese (ABSPP) as a sham charity that ostensibly raised funds for humanitarian purposes but in reality helped bankroll Hamas's military wing.¹⁶

The U.S. Treasury escalated this line of effort on June 10, 2025, sanctioning five individuals and five "sham charities" located abroad that Treasury said were prominent financial supporters of Hamas's military wing and responsible for funding it under the pretense of humanitarian work. Treasury's narrative emphasized a recurring operational pattern: secrecy about Hamas ties, exploitation of donor goodwill, and use of international projects and partners to generate and move funds.¹⁷

Sham charities designated (June 10, 2025):

- Al Weam Charitable Society (Gaza)
- Filistin Vakfi (Turkey)

¹⁵ U.S. Department of the Treasury, "Treasury Sanctions Two Hamas-Controlled Charities," press release, October 4, 2012

¹⁶ U.S. Department of the Treasury, "Treasury Targets Significant International Hamas Fundraising Network," press release, October 7, 2024

¹⁷ U.S. Department of the Treasury, "Treasury Disrupts Sham Overseas Charity Networks Funding Hamas and the PFLP," press release, June 10, 2025; OFAC, "Counter Terrorism Designations," June 10, 2025.



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- El Baraka Association for Charitable and Humanitarian Work (Algeria)
- Israa Charitable Foundation Netherlands (Netherlands)
- Associazione Benefica La Cupola d'Oro (Italy)

The 2025 tranche also underscored how earlier umbrella-network listings remain operationally relevant. Treasury described the Netherlands-based Israa Charitable Foundation Netherlands as a member of the U.S.-designated Union of Good and framed Union of Good as reporting directly to Hamas's military wing—illustrating that the 'charity problem' is often an interlocking ecosystem rather than isolated entities.¹⁸

Public reporting contemporaneous with the 2025 tranche reinforced Treasury's central message: Hamas and aligned networks continue to exploit the nonprofit sector because it provides both cover and a donor pipeline, especially during moments of acute humanitarian crisis.¹⁹

On January 21, 2026, Treasury announced a Gaza-focused action explicitly targeting nonprofit cover. Treasury stated the action targeted six Gaza-based organizations that claimed to provide medical care to Palestinian civilians but in fact supported Hamas's military wing, the Izz al-Din al-Qassam Brigades, and that the organizations used deception to raise funds from international donors.²⁰

Gaza-based organizations designated (January 21, 2026):

- Al-Falah Society Gaza (a.k.a. Al-Falah Charitable Organization)
- Al-Nur Society Gaza (a.k.a. Al-Noor Prisoner Society / Al-Nur Prisoner Association)
- Al-Salameh Society Gaza (a.k.a. Al-Salama Charitable Society for the Care of the Wounded and Disabled)
- Merciful Hands Gaza (a.k.a. Merciful Hands Charitable Society)
- Qawafil Society Gaza (a.k.a. Qawafil Alkhair Association)

¹⁸ U.S. Department of the Treasury, Press release, (June 10, 2025) (describing Israa Charitable Foundation Netherlands as a member of the U.S.-designated Union of Good and describing the Union of Good as reporting directly to Hamas's military wing. Accessed on March 9, 2026: <https://home.treasury.gov/news/press-releases/sb0162>

¹⁹ Reuters, "US issues sanctions against charities supporting Hamas, PFLP," June 10, 2025 (reporting Treasury's characterization of the charities as operating under the guise of humanitarian work while funneling funds to Hamas's military wing).

²⁰ U.S. Department of the Treasury, "Treasury Exposes and Disrupts Hamas's Covert Support Network," press release, January 21, 2026. <https://home.treasury.gov/news/press-releases/sb0368>. Accessed on March 9, 2026.



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- Waed Captive and Liberators Society (a.k.a. Waed/Vaed Association for Prisoners and Released Persons)

This 2026 tranche is significant because it compresses the ‘ Hamas charity problem ’ into a concrete field-level risk statement: organizations purporting to deliver civilian medical or social services can be embedded in, or co-opted by, Hamas’s military infrastructure, with donor deception as the enabling mechanism. It also underscores why sanctions alone are not a complete solution: unless donors, intermediaries, and banks incorporate these patterns into screening and enhanced due diligence, the charitable sector remains a high-value target for terrorist financiers.

Despite government, multilateral, and intergovernmental (such as the Financial Action Task Force) efforts since 9/11 to counter illicit use of charities to finance terrorism, the phenomenon persists. This challenge is exacerbated by clear ebb-and-flow interest, and disinterest, by governments in countering the misuse of charities by Hamas. As a consequence, if a two-state solution (which this author still sees as the only long-term enduring peace in the Middle East) is ever to be achieved, confidence building measures that center on countering Hamas financing, including its use of charities, will need to be a focus area. Otherwise, how can the international community realistically expect Israel to come to the negotiating table?

The designation chronology assembled in this paper reveals a pattern that is as instructive as it is troubling. The United States has demonstrated, repeatedly, that it possesses both the legal authorities and the intelligence capacity to identify and sanction Hamas-linked charities operating across multiple continents. Yet the record is defined as much by its gaps as by its actions. The near-total hiatus between 2012 and 2024, during which administrations of both parties refrained from significant charity-related designations, illustrates a structural vulnerability: unilateral sanctions are necessary but insufficient. They are necessary because they impose real financial consequences on designated entities, disrupt specific nodes in Hamas’s fundraising system, and create downstream compliance pressure on affiliated organizations. They are insufficient because they depend on sustained political will that has proven cyclical, because they have failed to compel allied governments to mirror U.S. determinations, and because Hamas has consistently demonstrated the capacity to reconstitute charitable networks faster than any single government can dismantle them. What is needed are institutional structures that embed counterterrorism finance objectives in multilateral frameworks capable of surviving the inevitable fluctuations in political attention. It is with that imperative in mind that this paper advances two proposals.



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III. Possible Policy Approaches

The United States could pursue two underexplored policy approaches to build a coalition for further action against Hamas's charitable activity while also encouraging Israel to reconsider the viability of a two-state solution. The author has experience with both structures noted below. First, the United States should reinvigorate the Gaza Counter-Arms Smuggling Initiative (GCASI). Second, the United States should form a multi-country version of the United Kingdom's Charity Commission that reviews and approves specific charities to operate in the Gaza Strip.

The Gaza Counter-Arms Smuggling Initiative (GCASI) was established in 2009 in the wake of Operation Cast Lead as a multilateral coordination mechanism designed to prevent and interdict the illicit trafficking of arms into the Gaza Strip. Comprising nine participating countries and with the EU and Israel attending as observers, GCASI represented a rare experiment in sustained, operationally focused counterproliferation cooperation directed at a non-state actor. The initiative held regular expert-level meetings in participating capitals, where member states shared intelligence regarding arms smuggling routes, financing networks, and interdiction opportunities. Discussions encompassed maritime smuggling, the tunnel networks beneath the Philadelphi Corridor, and the broader regional supply chains that moved Iranian-origin weaponry through Sudan, the Sinai, and onward into Gaza.²¹

GCASI's demise was neither operational nor strategic but political. European members suspended participation in 2012 following Israel's Operation Pillar of Defense.²² With the initiative's dissolution came the loss of a structured venue for the kind of intelligence sharing and coordinated diplomatic pressure that no bilateral relationship could fully replicate. The consequences have been tangible. In the years since GCASI's collapse, Hamas significantly expanded its arsenal, culminating in the military capabilities it deployed on October 7, 2023. Reports as recent as February 2026 confirm that Hamas continues to pursue rearmament through seaborne smuggling and drone-facilitated transfers from the Sinai, even during the current ceasefire period.²³

The United States should reinvigorate GCASI, adapted to the current threat environment. The original initiative focused primarily on physical interdiction. A reconstituted GCASI should integrate a financial intelligence-sharing component, building on models such as the Egmont Group's framework for FIU cooperation and the information-sharing protocols developed under

²¹ The GCASI members were Canada, Denmark, France, Germany, Italy, the Netherlands, Norway, the United Kingdom, and the United States. The EU and Israel attended as observers. See Government of Canada, "*Canada Hosting Meeting on Gaza Counter-Arms Smuggling Initiative*," June 10, 2009; Government of the Netherlands, "The Netherlands Hosts Gaza Counter-Arms Smuggling Meeting," September 2, 2010.

²² Jason M. Blazakis, "Bad Charity," *eJewish Philanthropy*, November 22, 2023

²³ Aaron Goren, "Hamas Turns to Seaborne Arms Smuggling," *Foundation for Defense of Democracies*, February 26, 2026.



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the Five Eyes partnership²⁴. Arms smuggling and terrorism financing are not separate problems; they are expressions of the same networks and treating them in isolation has proven inadequate. A revived GCASI that encompasses both the kinetic (arms smuggling) and financial dimensions of Hamas's supply chain would offer a more comprehensive tool for degrading the group's military capacity.

The Challenge of Charitable Infrastructure in Gaza

Hamas's exploitation of charitable organizations remains among the most persistent and difficult challenges in counterterrorism finance. The group has long used affiliated charities to build political legitimacy, provide social services that entrench its governance, and divert funds toward militant activities. The problem is not that charitable activity occurs in Gaza; it is that no adequate multilateral mechanism exists to vet, license, and monitor which organizations are permitted to operate and under what conditions.

The United Kingdom's Charity Commission offers an instructive, if imperfect, model. As an independent regulator, the Commission has the authority to open statutory inquiries into charities suspected of links to proscribed organizations, to freeze accounts, and to disqualify individuals from serving as trustees. In recent years, the Commission has exercised these powers with increasing frequency in the Gaza context, investigating charities over allegations of funding entities with ties to Hamas and coordinating with the Treasury's Office of Financial Sanctions Implementation to ensure compliance with the UK's counter-terrorism sanctions regime.²⁵

This model demonstrates that it is possible to regulate charitable activity in a conflict zone without imposing a blanket prohibition that would deny humanitarian access to a civilian population in desperate need.

However, the UK model operates within a single national jurisdiction. The challenge in Gaza is inherently transnational. Charities registered in one country raise funds across multiple jurisdictions and channel resources through local implementing partners whose affiliations may be opaque. No single national regulator can address this problem in isolation.

A Multilateral Charity Commission for Gaza

The United States should pursue the establishment of a multilateral charity commission, modeled in part on the UK's regulatory architecture, tasked with reviewing and approving specific charitable organizations to operate in the Gaza Strip. The core participants should be the United

²⁴ Five Eyes is the intelligence sharing relationship between the United States, United Kingdom, Australia, Canada, and New Zealand

²⁵ See, e.g., UK Charity Commission statutory inquiries into World Aid Convoy (May 2024), We Care Foundation (2025), and investigations into fundraising linked to sanctioned individuals connected to Gaza Now. See also UK Treasury Office of Financial Sanctions Implementation (OFSI) letters to charities operating in Gaza and the West Bank (March 2023).



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States, the United Kingdom, France, Qatar, and Israel. Each brings an essential and distinct competency to the table.

Qatar's inclusion is both the most consequential and the most contested element of this proposal. Qatar has been the single largest bilateral donor to Gaza over the past decade, channeling approximately \$1.49 billion in aid between 2012 and 2021 through the Qatari Committee for the Reconstruction of Gaza and the Qatar Fund for Development.²⁶ Successive Israeli governments accepted, and at times actively encouraged, this arrangement. Yet the October 7 attacks prompted a fundamental reassessment of whether Qatari aid functioned as a moderating force or instead enabled Hamas to redirect resources toward military preparation. The answer to this question matters less than the policy implication: any viable framework for regulating charitable activity in Gaza must include Qatar, because excluding the territory's largest donor from the regulatory architecture guarantees that the architecture will be circumvented. Bringing Qatar inside a structured, accountable mechanism transforms the dynamic from one of unmonitored bilateral aid flows to one of multilateral scrutiny.

The United States contributes leadership in countering illicit finance, anchored in the most extensive sanctions infrastructure in the world. The Treasury Department's Office of Foreign Assets Control, the Financial Crimes Enforcement Network, and the material support statutes under 18 U.S.C. §§ 2339A and 2339B provide the deepest reservoir of experience in identifying and disrupting the financial networks through which terrorist organizations exploit charitable structures. American participation lends both operational capability and political weight.

The United Kingdom is the natural institutional anchor. The Charity Commission's regulatory model, with its graduated toolkit of compliance cases, statutory inquiries, account freezes, and trustee disqualifications, provides the operational blueprint. The UK's Office of Financial Sanctions Implementation has already been actively engaging charities operating in the Gaza and the West Bank, establishing a body of practice that could inform the multilateral commission's procedures.

France introduces a participant with historic sympathy for Palestinian self-determination and a robust illicit financing regime. The FATF's 2022 mutual evaluation of France concluded that the country possesses a sophisticated and effective framework for combating money laundering and terrorist financing, with particularly strong results in financial intelligence, asset confiscation, and international cooperation.²⁷ France's Tracfin financial intelligence unit is among the most active in Europe, and the country froze approximately EUR 1.7 billion in assets under targeted

²⁶ Between 2012 and 2021, Qatar allocated approximately \$1.49 billion in aid to the Gaza Strip, funding essential needs including food, medicine, electricity, and basic public services. See Qatari Committee for the Reconstruction of Gaza (QCRG); Qatar Fund for Development (QFFD), March 2025

²⁷ FATF, *Mutual Evaluation of France: Anti-Money Laundering and Counter-Terrorist Financing Measures*, May 2022. The FATF concluded that France possesses a "robust and sophisticated framework" for combating money laundering and terrorist financing, with particularly strong results in financial intelligence, confiscation, and international cooperation.



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financial sanctions regimes between 2016 and 2021.²⁸ France also brings direct experience with Hamas-linked charitable infrastructure on its own soil: the *Comite de Bienfaisance et de Secours aux Palestiniens* (CBSP), one of the five charities designated by the U.S. Treasury in 2003 as part of Hamas's European funding network, was a French-registered entity. French courts and regulators have grappled with the challenge of distinguishing legitimate charitable activity from terrorist financing in the Palestinian context for more than two decades. Politically, France's participation signals that the commission is not a vehicle for one side of the conflict. France has historically maintained sympathy for Palestinian self-determination while simultaneously prosecuting terrorism financing with vigor, particularly after the ISIS 2015 attacks on its own soil. That dual posture gives the commission credibility across the political spectrum of the Israeli-Palestinian question that an exclusively Anglophone or Gulf-dominated body would lack.

Israel's participation in the work of the commission is critical to its success. Israeli intelligence services possess the most granular understanding of Hamas's organizational structure, including the relationships between ostensibly civilian charities and the group's military and political apparatus. The designation chronology in this paper is itself a testament to the value of Israeli intelligence: many of the U.S. Treasury's most significant actions against Hamas-linked charities were informed by Israeli assessments shared through bilateral channels, including the GCASI framework when it was active. Without Israeli participation, the commission would lack the intelligence foundation on which effective vetting depends. Strategically, Israel's inclusion gives the commission credibility with those who would otherwise dismiss it as insufficiently attentive to security concerns. But Israel also stands to gain something from the arrangement. A functioning multilateral commission that demonstrably regulates charitable activity in Gaza provides Israel with a mechanism for ensuring that reconstruction aid does not become a vector for Hamas's reconstitution, a concern that, absent such a structure, will remain a justification for restricting humanitarian access and resisting engagement with any post-conflict governance framework. The commission offers Israel a path from unilateral control, which is unsustainable, to multilateral oversight, which can be enduring.

Two Frameworks: One Strategy

A reinvigorated GCASI and a multilateral charity commission are not separate proposals. They are complementary halves of a single strategy for the managed constraint of Hamas that addresses both the military and political-financial dimensions of the group's power.

GCASI addresses the supply side: the weapons, materiel, and dual-use goods that sustain Hamas's capacity for armed violence. The charity commission addresses the demand side: the financial and social infrastructure through which Hamas maintains political control, recruits, and diverts ostensibly humanitarian resources toward militant ends. Together, they constitute a

²⁸ Between 2016 and May 2021, France froze approximately EUR 1.7 billion in assets belonging to persons and entities designated under national and EU targeted financial sanctions regimes. See FATF Mutual Evaluation of France, 2022.



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framework that constrains Hamas without imposing a blanket prohibition on the economic and humanitarian activity that Gaza's civilian population requires to survive.

The strategic payoff extends beyond counterterrorism. One of the most persistent obstacles to Israeli engagement with a two-state framework is the conviction that any Palestinian-governed territory will inevitably become an unmonitored staging ground for attacks. This conviction is not unfounded; the trajectory from Israel's 2005 disengagement to October 7 provides ample evidence for the skeptic's case. But the appropriate response is not to abandon the possibility of Palestinian governance. It is to build the multilateral structures that make governance safe, for both populations. A credible GCASI that demonstrably constrains Hamas's rearmament, paired with a credible charity commission that demonstrably prevents the co-optation of humanitarian infrastructure, offers Israel security guarantees rooted in multilateral institutions rather than in perpetual occupation or unilateral military action. That is the only foundation on which a durable two-state outcome can be built.

Neither proposal is without risk. Both require sustained political commitment from participating states, and the history of multilateral coordination in this arena is not encouraging. GCASI itself collapsed under political pressure once before. The charity commission would operate in one of the most contested humanitarian environments on earth, where every regulatory decision carries political implications. But the alternative to imperfect multilateral mechanisms is not perfection. It is the continuation of a status quo in which Hamas arms with impunity and charitable infrastructure operates without meaningful oversight, a status quo that has already produced catastrophic results for Israelis and Palestinians alike.

IV. Conclusion

The record examined in this paper tells a story of intermittent resolve. Since 2003, the United States has designated dozens of Hamas-linked charities and nonprofit fronts, each action accompanied by language that correctly identifies the pattern: organizations operating under the guise of humanitarian work while channeling resources to Hamas's military and political infrastructure. Yet the designation record is also marked by significant gaps, most notably the near-total hiatus between 2012 and 2024, during which successive administrations weighed the political costs of sanctioning entities linked to Gaza's de facto governing authority and largely chose inaction. The result is a patchwork of enforcement that has disrupted individual nodes without dismantling the underlying ecosystem. Hamas adapted, diversified, and continued to exploit the charitable sector because the international community's attention to the problem has been cyclical rather than sustained.

That cyclical pattern must end if any meaningful progress toward a two-state solution is to be achieved. The proposals advanced in this paper, the reinvigoration of GCASI and the establishment of a multilateral charity commission comprising the United States, the United Kingdom, France, Qatar, and Israel, are designed to break the cycle by institutionalizing



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oversight rather than relying on episodic political will. Institutions endure where political attention does not. The fundamental insight of both proposals is that the problem of Hamas financing, and specifically its exploitation of charitable infrastructure, cannot be solved by any single state acting unilaterally. The U.S. designation record, however extensive, has not compelled European states to mirror its determinations. The UK Charity Commission, however rigorous, operates within a single jurisdiction while Hamas's charitable networks span continents. The solution must be multilateral, and it must be structured to survive the political turbulence that has historically derailed cooperation in this space.

These proposals are not, however, without vulnerabilities that deserve candid acknowledgment. The most immediate objection concerns Qatar's inclusion in the charity commission. Critics will argue, with justification grounded in the Shin Bet's post-October 7 assessments and in documentary evidence recovered during the war in Gaza, that Qatari funding enabled rather than moderated Hamas's military buildup. The counterargument is not that Qatar's record is unblemished. It is that Qatar's financial capacity is indispensable to Gaza's reconstruction, and that excluding the territory's largest donor from the regulatory architecture does not eliminate Qatari money from Gaza. It eliminates oversight of that money. The commission's value lies precisely in converting Qatar from an unaccountable bilateral donor into a participant bound by collective standards and subject to peer scrutiny. Qatar's institutional incentives align with this arrangement: Doha's reputation sustained severe damage after October 7, and participation in a legitimate multilateral oversight body offers a credibility rehabilitation pathway that unilateral aid cannot provide. The commission gives Qatar something it needs, and in exchange, the commission gains the financial participation without which Gaza's reconstruction cannot proceed at the scale required.

A second challenge concerns enforcement. The charity commission's authority to vet, license, and monitor charitable organizations operating in Gaza is meaningful only if non-compliance carries consequences. In a territory with fragmented governance and no sovereign legal system to compel adherence, enforcement must be constructed from the combined capacities of participating states. Three layers are available. First, each participating state implements the commission's decisions through its own domestic sanctions and regulatory authorities: OFAC in the United States, OFSI and the Charity Commission in the United Kingdom, Tracfin in France, and their Israeli counterparts. A commission determination to revoke authorization thus triggers immediate financial consequences across five jurisdictions, effectively severing a non-compliant charity from the banking systems and donor bases that sustain it. Second, the commission can establish a recognized whitelist of authorized organizations, conditioning donor-state funding and banking access on whitelist status. Financial institutions already subject to extensive AML/CFT due diligence obligations gain a clear compliance reference point, creating a market-driven enforcement dynamic in which the formal financial system itself excludes unauthorized entities. Third, Qatar's physical presence in Gaza through the Qatar Committee for the Reconstruction of Gaza and its coordination with implementing partners provides the commission with something approximating on-the-ground monitoring capacity that Western



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states lack. This is an enforcement asset, not a liability, provided it operates within the commission's framework rather than outside it.

A third question, one that attentive readers will have noted, concerns Egypt's absence from both proposals. The omission is deliberate. Egypt's role in Gaza has historically centered on border security along the Philadelphi Corridor and political mediation between Hamas and Israel. Both functions are important, but neither maps onto the charity commission's financial-regulatory mandate. Egypt's own domestic record on civil society regulation, which has drawn sustained criticism for using regulatory tools to suppress legitimate organizations rather than to prevent terrorist financing, makes it an unsuitable model for the kind of balanced oversight the commission requires. Egypt's cooperation is essential, but it belongs in a different lane. A reconstituted GCASI, with its focus on arms interdiction, intelligence sharing, and border security, is the natural venue for Egyptian participation. The two frameworks operate in parallel: the commission decides which organizations are authorized to operate, and GCASI, with Egyptian and Israeli cooperation, ensures that unauthorized entities cannot move materiel or funds across the border. This division of labor is more honest and more functional than a single body attempting to perform both functions.

A fourth concern is whether GCASI's reinvigoration can succeed where its original iteration failed. European members walked away in 2012 because the political costs of association with Israeli military operations outweighed the intelligence-sharing benefits. The post-October 7 environment has, if anything, made European alignment with Israeli security cooperation more fraught. A reconstituted GCASI must therefore be designed for durability. This may require housing the initiative within an institutional framework that survives individual members' political withdrawal, perhaps linked to an existing multilateral body or treaty structure rather than operating as an ad hoc coalition. It may also require expanding the membership beyond the original European-North American core to include Gulf states with both the political interest and the intelligence capabilities to contribute. The key insight is that GCASI's collapse was a design failure, not a concept failure. The concept of multilateral intelligence sharing directed at Hamas's supply chains remains sound. The design must be made more resilient.

Finally, both proposals must contend with the definitional challenge at the heart of Hamas's charitable infrastructure. Hamas does not merely exploit charities; in many cases, its affiliated organizations perform functions that would, in the absence of a functioning state, be recognized as essential public services: healthcare, education, social welfare. A commission that vets "charities" will immediately confront the question of whether organizations performing quasi-governmental functions fall within its remit. Drawing that line incorrectly in either direction is costly. Too narrow a scope allows Hamas to operate through entities classified as something other than charities. Too broad a scope transforms the commission into a de facto governing authority for Gaza's social services, a role no external body should assume and no participant will accept. The commission's mandate must therefore include an affirmative obligation to facilitate legitimate humanitarian and social service operations, not merely a negative authority



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to block suspect ones. The goal is not to deny Gaza's population access to services. It is to ensure that the organizations providing those services are not simultaneously serving as conduits for Hamas's military and political apparatus.

None of these challenges are insurmountable, but none should be minimized. The honest assessment is that no enforcement mechanism will achieve airtight control in a territory where a well-resourced non-state actor has deep institutional roots. The appropriate standard is not perfection. It is whether these proposals make the exploitation of charitable infrastructure meaningfully harder, more detectable, and more consequential when discovered. By that standard, the combination of a reinvigorated GCASI and a multilateral charity commission represents a significant improvement over the status quo, which has essentially no multilateral regulatory mechanism for charitable activity in Gaza and no structured intelligence-sharing framework for arms interdiction. Furthermore, a weakened Iran makes both policy recommendations more achievable.

The stakes extend well beyond counterterrorism. As this paper has argued, the persistent failure to address Hamas's financing, and particularly its exploitation of the charitable sector, is not merely a security problem. It is a diplomatic obstacle. Israel will not engage seriously with a two-state framework so long as it believes that any Palestinian-governed territory will become an unmonitored staging ground for the next attack. That belief is not irrational; the arc from disengagement in 2005 to October 7, 2023 provides its evidence. The only way to alter that calculus is to build multilateral structures that demonstrably constrain Hamas's capacity for violence and its ability to co-opt the institutions of civilian life. GCASI and the charity commission, operating in tandem, offer the skeleton of such a structure. The task now is to give it muscle and sinew through the sustained commitment of states that recognize the alternative, continued drift, episodic enforcement, and unmonitored aid flows, has already failed, catastrophically, for both peoples.

V. About the Author

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VI. Appendix: U.S. designations of Hamas-linked charities and nonprofit fronts (selected)

Date	Entity (type)	What Treasury/OFAC alleged (high-level)	Other government actions (select notes)
Aug 22, 2003	CBSP (charity) – France	Part of Hamas funding network in Europe.	Australia reportedly followed U.S. designations (open source).
Aug 22, 2003	ASP (charity) – Switzerland	Related to CBSP; support to Hamas.	Australia reportedly followed U.S. designations (open source).
Aug 22, 2003	Interpal (charity) – UK	Support to Hamas (U.S. designation).	UK regulators conducted inquiries; ordered dissociation from Union of Good.
Aug 22, 2003	PVOE (charity) – Austria	Support to Hamas fundraising network.	Australia reportedly followed U.S. designations (open source).
Aug 22, 2003	Sanabil Association (charity) – Lebanon.	Support to Hamas fundraising network.	Australia reportedly followed U.S. designations (open source).
Nov 12, 2008	Union of Good (umbrella network)	Umbrella network created by Hamas leadership to transfer funds to Hamas.	Triggered regulatory/compliance pressure on member charities in some jurisdictions.
Oct 4, 2012	Al-Quds International Foundation (charity) – Lebanon	Hamas-controlled charity providing financial support / acting on behalf of Hamas.	No comprehensive public harmonization; remains a due diligence red flag.
Oct 4, 2012	Al-Waqfiya (charity) – Lebanon	Hamas-controlled charity providing financial support / acting on behalf of Hamas.	Same as above.
Oct 7, 2024	ABSPP (sham charity) – Italy	Raised funds as ‘humanitarian’ aid; helped bankroll Hamas’s military wing.	Treasury emphasized European fundraising ecosystem; partner actions vary.
Jun 10, 2025	Al Weam Charitable Society (charity/NPO) – Gaza	Clandestinely controlled by Hamas; integrated into military wing; raised funds via donors.	U.S. emphasized safeguarding charitable sector; some partner coordination noted.



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Date	Entity (type)	What Treasury/OFAC alleged (high-level)	Other government actions (select notes)
Jun 10, 2025	Israa Charitable Foundation Netherlands (charity/NPO) – Netherlands	Member of Union of Good; fundraising support to Hamas military wing.	Illustrates cross-border charity risk; national responses vary.
Jun 10, 2025	Filistin Vakfi (charity/NPO) – Turkey	Prominent supporter network linked to Hamas military wing.	National responses vary; sanctions raise compliance risk for banks/donors.
Jun 10, 2025	El Baraka Association (charity/NPO) – Algeria	Prominent supporter network linked to Hamas military wing.	As above.
Jun 10, 2025	La Cupola d’Oro (charity/NPO) – Italy	Prominent supporter network linked to Hamas military wing.	As above.
Jan 21, 2026	Six Gaza-based organizations (NPOs)	Claimed medical care; supported Qassam Brigades; used donor deception.	Strong due diligence signal for humanitarian pipelines into Gaza.