Title: Absurd as it sounds, money laundering and terrorist funding is absolutely a real concern that

GameStop's NFT marketplace will legally be required to address

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Largest Ever Seizure of Terrorist Organizations' Cryptocurrency Accounts

The Justice Department today announced the dismantling of three terrorist financing cyber-enabled campaigns, involving the al-Qassam Brigades, Hamas's military wing, al-Qaeda, and Islamic State of Iraq and the Levant (ISIS). This coordinated operation is detailed in three forfeiture complaints and a criminal complaint unsealed today in the District of Columbia. These actions represent the government's largest-ever seizure of cryptocurrency in the terrorism context.

These three terror finance campaigns all relied on sophisticated cyber-tools, including the solicitation of cryptocurrency donations from around the world. The action demonstrates how different terrorist groups have similarly adapted their terror finance activities to the cyber age. Each group used cryptocurrency and social media to garner attention and raise funds for their terror campaigns. Pursuant to judicially-authorized warrants, U.S. authorities seized millions of dollars, over 300 cryptocurrency accounts, four websites, and four Facebook pages all related to the criminal enterprise.



Anti-Money Laundering and Countering the Financing of Terrorism National Priorities

June 30, 2021

The Financial Crimes Enforcement Network (FinCEN),¹ after consulting with the U.S. Department of the Treasury's (Treasury's) Offices of Terrorist Financing and Financial Crimes, Foreign Assets Control (OFAC), and Intelligence and Analysis, as well as the Attorney General, Federal functional regulators,² relevant state financial regulators, and relevant law enforcement and national security agencies, is issuing these first government-wide priorities for anti-money laundering and countering the financing of terrorism (AML/CFT) policy (the "Priorities"). These Priorities are being issued pursuant to Section 5318(h) (4)(A) of the Bank Secrecy Act (BSA),³ as amended by Section 6101(b)(2)(C) of the Anti-Money Laundering Act of 2020 (the "AML Act").⁴ As required by Section 5318(h)(4)(C) of the BSA, the Priorities are consistent with Treasury's 2018 and 2020 National Strategy for Combating Terrorist and Other Illicit Financing (the "National Strategy").⁵

As explained in more detail below, the Priorities are, in no particular order: (1) corruption; (2) cybercrime, including relevant cybersecurity and virtual currency considerations; (3) foreign and domestic terrorist financing; (4) fraud; (5) transnational criminal organization activity; (6) drug trafficking organization activity; (7) human trafficking and human smuggling; and (8) proliferation financing. The establishment of these Priorities is intended to assist all covered institutions⁶ in their efforts to meet their obligations under laws and regulations designed to combat money laundering and counter terrorist financing.