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Verified Delivery

Field evidence that anti-diversion controls can work in sanctioned and conflict-affected environments

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Edwina A. Thompson

Author, *Trust is the Coin of the Realm* (Oxford University Press, 2011; Archive Edition, 2026) · Founder & CEO, Amanacard Group

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PROVENANCE

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Why this paper

The effectiveness question Congress is putting to FinCEN has an operational counterpart: can a payment into a sanctioned or conflict-affected market be evidenced to the person who received it? Humanitarian payments into fragile states are a practical test. Prohibition without a verified delivery channel can suppress legitimate access while leaving authorities with less visibility into who ultimately received the money. Related congressional policy is moving in parallel. H.R. 260, the No Tax Dollars for Terrorists Act, was reported in the Senate on February 10, 2026; it would require a strategy to oppose foreign assistance by foreign countries and nongovernmental organizations to the Taliban. The operational question is how to distinguish support to a sanctioned actor from a verified payment to an Afghan civilian.[1,2]

The evidence below comes from a practical attempt to answer that question. Amanacard is the payment-and-evidence infrastructure that emerged from it: a means of carrying verified identity, source-of-funds and project attribution, sanctions screening, recipient confirmation and reconciliation across the part of a transaction conventional bank records rarely show — from the last regulated account to the person who receives the value. It was built to make that part of the chain observable.

It was a collaborative field project, not a stand-alone technology proposition. It drew on senior practitioners from law enforcement, banking, aid and commodities trade, alongside engineers who could translate their judgments into a working system. The global law firm Herbert Smith Freehills Kramer LLP has provided sustained pro bono legal counsel; the work has also benefited from contributions by the Dutch development bank and long-term backing from Dutch and British private investors.[12]

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The purpose was not to prove that software can move money. It was to test whether the controls expected in regulated finance could reach the last mile of a sanctioned or conflict-affected market while working with the licensed local institutions, traders and trust relationships on which delivery depends. That minimum viable platform has now been built and field-tested through live operations. The figures and cases below are its operating results, not forecasts.

The results support a practical conclusion: diversion is not inevitable; it depends on the rails, controls and local trust relationships around a payment. Here, 'receipt-verified' means that recipient confirmation is captured separately from the payout agent's settlement record and reconciled against it; it does not mean that the payout agent independently verifies itself. An internal operational-data extraction covering October 2018 to August 2024 reports more than USD 46 million in U.S. Government-related value delivered through more than 82,000 end-recipient transactions, averaging USD 566. Approximately 88% originated as USAID or State Department funding, channelled through implementers. Transactions are not unique recipients: the wider programme record reports more than 50,000 direct recipients and, counting reported household members, support reaching more than 300,000 people in total. Definitions and underlying records can be supplied on request.[3]

> "Diversion is not inevitable; it depends on the rails, controls and local trust relationships around a payment."

Three cases from the corridors

1 Afghanistan, 2021-22: a compressed funding rescue after the U.S. withdrawal

When the already fragile Afghan banking system collapsed in August 2021, U.S.-funded implementers did not stop owing money. Staff salaries, severance and death benefits, subcontractor invoices and grants to local organisations remained due, while the rails to pay them vanished. One large U.S. consulting firm implementing a USAID rule-of-law programme spent six months trying unsuccessfully to transfer funds to its Kabul bank account. It then engaged our service. The harder half of the work was human rather than technical: locating and re-verifying staff, suppliers and grantees dispersed across Afghanistan and beyond. More than USD 1 million in obligations was then paid with real-time tracking to staff, independent media organisations, universities and organisations educating women. The firm's written reference states that, without the service, it was unlikely to have honoured its commitments or ensured that taxpayer dollars reached the intended recipients.[4]

> "The harder half of the work was human rather than technical."

In the period that followed, a major U.S. engineering contractor completed outstanding payments to local subcontractors and employees under a USAID-funded programme. Each recipient's identity was verified, each payment was confirmed in real time, and the process created tamper-evident, time-stamped records built for audit readiness. Those records were later assembled, invoice by invoice, into evidence packages supporting a SIGAR financial audit of incurred costs — documentation generated at the time of payment rather than reconstructed after the fact.[4,11]

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The service also delivered severance payments and death benefits for major U.S. infrastructure projects after the withdrawal. In December 2021 it completed a Kabul payment round for a European human-security agency that was keeping demining operations going. The agency had negotiated continued access; payment confirmation was captured separately and reconciled. Its director recorded that recipients received funds 'not only successfully, but without compromising their physical safety.'[4]

The rescue phase became routine operation. Under a USAID-funded national health programme, USD 4 million in structured salary payments and training stipends reached Community Healthcare Workers across 19 provinces in 2022-23, with completion certified. Under UN-funded education programming, USD 7 million in household cash assistance and salary payments to teachers and staff moved across 17 provinces in 2022-24, also completion certified. A European faith-based agency working across eight provinces on U.K.-funded programmes described the period as follows:[4]

> *"In the immediate aftermath of the change in regime and the total collapse of the banking system, we were able to keep programming due to our partnership with you... funds end up with the end recipient without interference or delay." — Country representative, European humanitarian agency, February 2025*[4]

This is the evidence missing from a binary diversion debate. During the same period, SIGAR documented Taliban taxation of, and coerced diversion from, U.S.-funded assistance delivered through conventional implementing chains: 38 of 65 responding partners reported at least USD 10.9 million in payments to the Taliban-controlled government, and 17 reported direct Taliban pressure, including diversion of aid to chosen populations. U.S.-funded obligations were also being discharged through verified, evidenced and reconciled payments at scale, province by province.[4,14]

2 Syria, 2020-21: infrastructure and health care at the hardest last mile

Infrastructure. A multi-donor recovery trust fund administered by a European development bank funded waste-disposal and road-clearance operations between Hajin, Deir-ez-Zor and Ar-Raqqa — territory among the last held by ISIS, with no functioning banking channel available to the programme and cash agents facing explicit threats on the 400 km route from Raqqa city. The contractor's previous channel had been found to involve a sanctioned network and was abandoned. A compliant corridor was built in days: contract signed May 4, 2020; first payments delivered and separately receipt-verified inside Syria by May 19, including approximately USD 180,000 of arrears. Over twelve months, approximately USD 2 million moved in more than a dozen rounds. Each round closed with a report signed by the platform, contractor and money-transfer network; banking hops were documented and residual balances were carried forward and reconciled.[4]

Healthcare. In parallel, U.S. Government and allied funding reached Syrian medical organisations and emergency health and cash programming through the same verified channels, with recipient-level proof for each disbursement.[4]

Infrastructure and health are foundations of recovery. As reconstruction funding moves into Syria, the oversight question is whether anyone can prove where the money went. This record shows that transaction-level proof is attainable in districts where conventional banking cannot provide it.

3 Yemen, 2023: partnering with a licensed bank whose capacity war had degraded

In a corridor with two rival central banks, a regulated local microfinance bank delivered monthly cash assistance to 525 verified households in Taiz governorate across six rounds between August and December 2023, reconciled round by round. Most participants were women and many lacked official identity documents — the population conventional KYC

can exclude. A banking licence was not the same as correspondent-grade capacity after years of war and isolation. The platform supplied the missing professional layer: it held the full identity record while the bank received only the minimum data needed for payout; a co-signed foreign-exchange approval locked the rate for each round; and the client's written confirmation recorded KYC, data protection and AML/CFT controls alongside delivery. This was a partnership model: regulated international infrastructure wrapped around a licensed local bank, raising capacity rather than bypassing it.[4]

Seeing the whole chain: what full funds-attribution makes possible

Standard award-level reporting generally does not produce an end-to-end, transaction-level view of a payment. In the operating record described here, each payout carries source-of-funds and project attribution, including the exact blend where implementers combine donors and projects within a programme. The internal data extraction identifies more than 140 donor-attribution combinations reaching individual recipients. It also distinguishes intermediary payments from end-recipient payouts: in the relevant dataset, intermediary transactions, which sit outside the end-recipient total given above, averaged USD 9,137, while end-recipient transactions averaged USD 566. These are different transaction classes, not unique-recipient counts.[3]

Each payment is evidenced at two distinct points: the funding leg, where sender funds originate in and move through regulated bank accounts, and the payout leg, where value is delivered — often in cash funded through third-party trade settlement — to the verified recipient. Recording both legs is not counting the same value twice. It captures the two points where visibility is commonly lost, while attributing and reconciling the intermediaries between them. A simplified rendering of this flow — and of where conventional visibility ends — is at Annex B.

The significance extends beyond one donor. Congressional oversight of foreign assistance follows money from appropriation through prime contractors, sub-awardees, local partners and payment agents, with visibility often thinning at each hand-off. The record described here demonstrates that attribution can survive donor blending and intermediary layers to the person or household receiving the value.

The accountability standard is achievable: it does not require ending assistance or inventing a new technology. A working mechanism was already delivering U.S. funds during the period under review, but it was not visible to exercises conducted at the level of awards and obligations rather than payments and recipients. Applied at scale and with allied donors that already co-fund programmes, the same discipline would allow Congress to ask: who received the money, under which project and for what purpose?

The expectation that active-conflict assistance should be traceable to a verified recipient may sound unrealistic. The cases above show that it is operationally possible, and that the resulting records can support Inspector General audit work. The claim is not that technology eliminates diversion risk, but that verified identity, recorded delivery and reconciliation make the risk measurable and contestable.

Where oversight visibility currently ends — and where it could reach

SIGAR traced the UN's cash-shipment chain to the private Afghan bank it uses and onward into implementing organisations' accounts, while recording that pooled UN funding prevents State and USAID from tying their own contributions to those shipments. Beyond that point the public record thins, while organisations may draw and distribute substantial physical cash through money service providers. State told SIGAR that, to the best of its

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knowledge, no electronic financial-delivery system was then scalable enough to meet the UN's liquidity needs. Systems of that kind were operating in Afghanistan during that period, delivering U.S. Government-related funds with transaction-level delivery evidence. The records are available on request.[5]

There is a fair question about why this capability was not better known. Operating compliant channels in Taliban-era Afghanistan requires discretion because public promotion can jeopardise access and safety. But discreet is not hidden. I briefed USAID and the U.S. Treasury on the capability and offered a briefing to SIGAR after publication of its evaluation. The gap between what award-level reports can see and what happens between the bank and the recipient is measurable, documentable and closable.

When the screening machinery misfires: a note on data

A November 2024 episode illustrates a weakness in the screening infrastructure Congress oversees. OFAC designated an organisation unconnected to this field under the West Bank programme; its registered name carried the alias 'AMANA' in the SDN entry. Within hours, people relying on our corridors in Syria and Yemen were asking whether Amanacard had been sanctioned. OFAC's compliance team confirmed in writing the next day that Amanacard was a distinct entity with no known connection and that U.S. financial institutions were not prohibited from processing its transactions. Canada's Sanctions Bureau issued a signed confirmation on November 29, 2024. Both letters are available on request.[6]

The official correction did not propagate as quickly as the original match. The November SDN entry had already entered commercial screening and data systems. On January 24, 2025, after Executive Order 14115 was revoked, OFAC removed all persons designated under that order from the SDN list. Banks nevertheless continued to send us name-match questions after the removal; dated correspondence can be supplied. The policy lesson is not about the merits of a particular designation. It is that screening ecosystems can distribute suspicion automatically while corrections and removals travel manually. Sanctions integrity and financial access both require correction mechanisms with comparable reach and speed.[7]

> "Screening ecosystems can distribute suspicion automatically while corrections and removals travel manually."

What this evidence supports

- **Anti-diversion strategy should specify evidence standards, not only prohibitions.** H.R. 260 will succeed or fail on the ability to distinguish assistance to the Taliban from verified payment to Afghan civilians. A checkable operational standard includes identity-linked delivery, recipient evidence captured separately from the payout record, round-by-round reconciliation and documented screening of the intermediaries within the recorded chain.[2]
- **"Sanctions screening" is only as strong as the identity beneath it.** Checking an unverified, self-declared name against a list is a formality a sanctioned actor may defeat by supplying another name. The question that separates control from ritual is: screening whom, established how? In the record described here, due diligence established the counterparty's identity before screening, including through trained local verification where necessary.

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- **Prohibition without channels can defeat its own purpose.** A 2013 article with Aimen Dean and Tom Keatinge framed the problem as one of effectiveness; Safer Corridors then predicted that account loss would drive legitimate Somalia-U.K. payments underground and blur clean funds with criminal or terrorist finance. The operating record above shows why that warning matters retrospectively: legitimate obligations do not disappear when compliant corridors close; the evidence around them can.[8,13]
- **De-risking and diversion are the same visibility problem viewed from opposite ends.** Whatever prompts a bank to exit, oversight then loses regulated infrastructure that could generate evidence. Tracking de-risking outcomes is therefore anti-diversion policy as well as financial-access policy.[9]
- **For conflict corridors, the Recommendation 16 question is whether structured payment data can survive sanctions constraints, cash payout and recipient-safety requirements.** FATF revised Recommendation 16 in June 2025 and is consulting on guidance for implementation through August 21, 2026. U.S. engagement should use evidence from conflict corridors to ensure that the requirements are effective, proportionate and compatible with access.[10]

Basis of this evidence

This evidence combines field research, collaborative development and live operating records. Its research foundation is doctoral fieldwork inside the money markets of Afghanistan, Pakistan and the Gulf, published by Oxford University Press as *Trust is the Coin of the Realm* and summarised in the companion paper, “Demystifying Hawala.”

The operating record was generated by Amanacard group entities supervised for money laundering and remittance in the United Kingdom, Australia and Canada, and through a decade of fragile-state operations, including wartime Syria. Responsibility for the analysis and conclusions remains mine. Supporting documentation can be provided on request, subject to partner consent and beneficiary-safety review. Contact via trustisthecoin.com.[12]

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ANNEX A

Selected engagements (client names withheld)

Client names are withheld in this public version. Contracts, completion certificates and written references can be supplied confidentially on request, subject to partner consent and beneficiary-safety review.

Client / implementer role	Programme and funding	Corridor / period	Value / scale
U.S. rule-of-law implementer	USAID-funded close-out payments to staff, grantees and subcontractors after banking collapse	Afghanistan / 2021-22	USD 1,000,000+
U.S. engineering contractor	USAID-funded payments to local subcontractors and employees; audit-supporting records	Afghanistan / 2022-24	Values on file
International health implementer	USAID-funded Community Healthcare Worker salaries and training stipends; 19 provinces	Afghanistan / 2022-23	USD 4,000,000
International education implementer	UN-funded household cash, teacher and staff salaries, and supplier payments; 17 provinces	Afghanistan / 2022-24	USD 7,000,000
European faith-based agency	U.K.-funded cash and voucher assistance; eight provinces; written reference on file	Afghanistan / 2022–present	Values on file
European human-security agency	Kabul staff payment round; director's safety confirmation on file	Afghanistan / 2021	Values on file
Local development implementer and licensed bank	Household cash assistance in Taiz; written confirmation on file	Yemen / 2023	525 households / 6 rounds

Note: the SIGAR financial audit of incurred costs referenced in Case 1 is a matter of public record; this paper does not identify the audit or the engagement it concerns. [11]

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ANNEX B

Simplified aid flow: the last mile in view

The figure below reduces a typical assistance chain to its simplest form. Conventional oversight follows funds from the sender through the implementer to the field office, and largely stops there. The verified last mile described in this paper extends evidencing past that line, to each named end recipient.

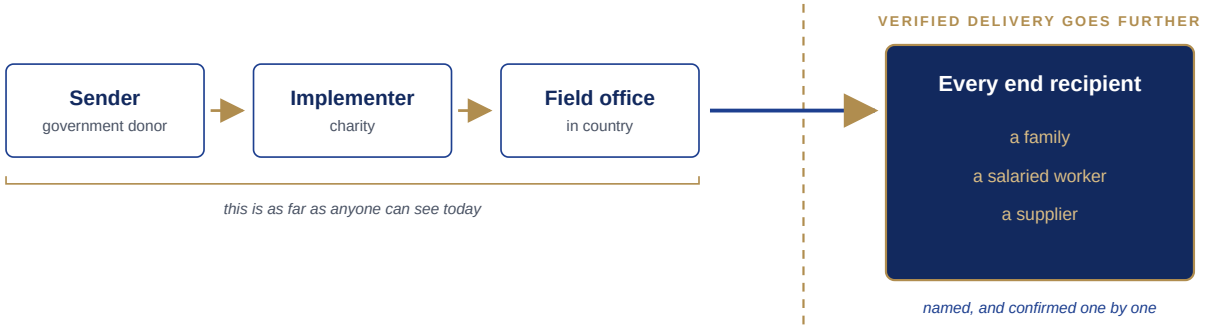


Figure B1. Simplified aid flow. Conventional visibility ends at the field office; verified delivery extends it to the end recipient, named and confirmed one by one. Simplified from the SecureAid money-flow schematic prepared for the GIZ Syria hawala study (2018); illustrative.

Sources and notes

1 U.S. House Committee on Financial Services, Committee Majority Staff, hearing memorandum, "Oversight of the Financial Crimes Enforcement Network" (July 16, 2026), official memorandum; FinCEN, proposed AML/CFT-program rule announcement (April 7, 2026), official release.

2 H.R. 260, 119th Congress, No Tax Dollars for Terrorists Act, reported in the Senate February 10, 2026, official bill record.

3 Amanacard operational-data extraction for October 2018-August 2024. Figures are transaction counts and attributed payment value, not unique-recipient counts. Reported reach combines direct recipients and household beneficiaries. Underlying field definitions, inclusion/exclusion rules and source-system records are available on request.

4 Signed contracts, completion certificates, payment-round reports and written client references held on file. Household and participant counts are as recorded in the relevant client's signed confirmation. Client names are withheld pending permission; records can be supplied confidentially subject to consent and safety review.

5 Special Inspector General for Afghanistan Reconstruction, SIGAR 24-12-IP, *Cash Shipments to Afghanistan: The UN Has Purchased and Transported More than $2.9 Billion to Afghanistan to Implement Humanitarian Assistance* (January 2024), p. 5 (pooled UN funding prevents State and USAID from identifying how much of their own contributions purchased cash), pp. 10-12 (the shipment, private-bank and implementing-organisation account chain), and State's response in Appendix III (to the best of its knowledge, no electronic financial-delivery system was then scalable enough to meet the UN's liquidity needs).

6 U.S. Department of the Treasury, Office of Foreign Assets Control, West Bank-related designations of November 18, 2024, listing "AMANA THE SETTLEMENT MOVEMENT OF GUSH EMUNIM CENTRAL COOPERATIVE ASSOCIATION LTD" with the alias "AMANA", official action.

7 U.S. Department of the Treasury, Office of Foreign Assets Control, West Bank-related designation removals of January 24, 2025, removing all persons designated under Executive Order 14115, which had itself been revoked on January 20, 2025 by Executive Order 14148; the removals are recorded at 90 Fed. Reg. 8424 (January 29, 2025), official action.

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8 Beechwood International, *Safer Corridors Rapid Assessment*: Case Study: Somalia and U.K. Banking (September 2013), pp. 37 and 40.

9 U.S. Department of the Treasury, *The Department of the Treasury's De-Risking Strategy* (April 2023), pp. 1-2 and 15-21 (printed pagination; the PDF runs two pages ahead), official report.

10 Financial Action Task Force, revised Recommendation 16 (agreed June 2025) and consultation on implementation guidance (responses due August 21, 2026), revision; consultation.

11 A SIGAR financial audit of incurred costs on a USAID-funded programme, cited here only as evidence that contemporaneous payment records supported audit work. The report is a matter of public record; it is not identified further because doing so would identify the client engagement. The reference can be supplied on request.

12 Project-development records and correspondence held on file. Herbert Smith Freehills Kramer LLP is identified for its sustained pro bono legal counsel; the other contributors are described by category. Their inclusion records contribution, not endorsement of this paper. Further detail can be supplied on request subject to consent.

13 Aimen Dean, Edwina Thompson and Tom Keatinge, "Draining the Ocean to Catch One Type of Fish: Evaluating the Effectiveness of the Global Counter-Terrorism Financing Regime," *Perspectives on Terrorism* 7, no. 4 (August 2013), pp. 62-78, especially pp. 66 and 70-74 (reporting volume, financial exclusion, risk-based reform, safe corridors, cashless systems and effectiveness benchmarks), journal article.

14 Special Inspector General for Afghanistan Reconstruction, SIGAR 24-22-AR, *U.S. Funds Benefitting the Taliban-Controlled Government* (May 2024), pp. 6-9. Of 65 responding implementing partners, 38 reported at least USD 10.9 million in taxes, fees, duties or utilities paid to the Taliban-controlled government, while 17 reported direct Taliban pressure, including diversion of assistance to Taliban-selected populations.

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