

October 30, 2025

Mr. Andy Jassy
Chief Executive Officer
Amazon.com, Inc.
410 Terry Avenue North
Seattle, WA 98109-5210
USA

Re: Notice of Exposure Under U.S. Sanctions Laws – Francesca Paola Albanese

Dear Mr. Jassy,

United Nations Watch, a non-profit organization dedicated to holding the United Nations accountable to its founding principles,¹ wishes to bring to your attention that Amazon.com, Inc. (“Amazon”) is providing prohibited services to Francesca Paola Albanese, including an e-commerce platform for the marketing and sale of her publications and a personal Amazon page, and to request the remedial actions outlined below.

On July 9, 2025, pursuant to President Trump’s Executive Order 14203,² U.S. Secretary of State Marco Rubio designated Ms. Albanese for full blocking sanctions³ on the grounds that she “directly engaged with the International Criminal Court (“ICC”) in efforts to investigate, arrest, detain, or prosecute nationals of the United States or Israel, without the consent of those two countries...making this a gross infringement on the sovereignty of both countries,” and that she pursued “campaigns of political and economic warfare, which threaten [U.S.] national interests and sovereignty.”⁴

¹ See *Our Work*, UN Watch (Last visited July 30, 2025), <https://unwatch.org/about-us/our-work/>.

² *Executive Order 14203, Imposing Sanctions on the International Criminal Court*, The White House (February 6, 2025), <https://www.whitehouse.gov/presidential-actions/2025/02/imposing-sanctions-on-the-international-criminal-court/>.

³ Under Executive Order 14203, full blocking sanctions—the most comprehensive form of U.S. economic sanctions—prohibit any U.S. person from directly or indirectly engaging in transactions with a designated individual such as Ms. Albanese, including the provision of services, and require the immediate blocking of all property and interests in property. See Executive Order 14203, § 1(b); 31 C.F.R. § 528.201(a).

⁴ Secretary of State Marco Rubio, *Sanctioning Lawfare that Targets U.S. and Israeli Persons*, U.S. Department of State (July 9, 2025), <https://www.state.gov/releases/office-of-the-spokesperson/2025/07/sanctioning-lawfare-that-targets-u-s-and-israeli-persons>.

Ms. Albanese's Designation and Threat to U.S. National Security and Armed Forces

According to the U.S. Department of State's official release, Ms. Albanese has engaged in activities that include:

- "Writing threatening letters to dozens of entities worldwide, including major American companies across finance, technology, defense, energy, and hospitality, making extreme and unfounded accusations and recommending the [ICC] pursue investigations and prosecutions of these companies and their executives."
- "Engag[ing] with the [ICC] in efforts to investigate, arrest, detain, or prosecute nationals of the United States or Israel, without the consent of those two countries."
- "Spew[ing] unabashed antisemitism, expressed support for terrorism, and open contempt for the United States, Israel, and the West."⁵

These actions were deemed a threat to U.S. sovereignty and national security interests. Indeed, as President Trump's Executive Order 14203 explained, the ICC's recent actions directly endanger "current and former United States personnel, including active service members of the Armed Forces, by exposing them to harassment, abuse, and possible arrest."

Prohibitions In Dealing with Ms. Albanese Under Executive Order 14203

Issued pursuant to the International Emergency Economic Powers Act (50 U.S.C. § 1701 *et seq.*), Executive Order 14203 authorizes the blocking of all property and interests in property of designated persons and prohibits the provision of any goods or services to or for their benefit. Specifically, Section 1 of Executive Order 14203 blocks "all property and interests in property of [Ms. Albanese] that are in the United States within the possession or control of any United States person," and indicates that such interests "may not be transferred, paid, exported, withdrawn, or otherwise dealt in." Section 3 provides that "the prohibitions in section 1(a) of this order include: (a) the making of any contribution or provision of funds, goods, or services by, to, or for the benefit of any person whose property and interests in property are blocked pursuant to section 1 of this order [including Ms. Albanese]; and (b) the receipt of any contribution or provision of funds, goods, or services from any such person." (*Emphasis added*).

Moreover, on July 1, 2025, the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") promulgated regulations implementing Executive Order 14203. These are codified at 31 C.F.R. Part 528 under the title *International Criminal Court-Related Sanctions Regulations*.⁶ Under § 528.201 "all transactions prohibited pursuant to E.O. 14203 of February 6, 2025 are prohibited pursuant to this part." This pertinent language is categorical—it does not limit liability to compensated services. Simply stated, all services,

⁵ Notably, the United States, Canada, France, and Germany—in unprecedented denunciation of a UN appointee—condemned Ms. Albanese for antisemitism and Holocaust inversion. *See Condemnations Against Antisemitic Rapporteur Francesca Albanese*, UN Watch (July 1, 2025), <https://unwatch.org/condemnations-against-antisemitic-un-rapporteur-francesca-albanese/>.

⁶ 31 CFR PART 528—International Criminal Court-Related Sanctions Regulations (July 1, 2025), <https://www.ecfr.gov/current/title-31/subtitle-B/chapter-V/part-528>.

regardless of payment or lack thereof, are covered, just as any funds sent to or received from Ms. Albanese would represent a prohibited dealing.

Finally, Section 6 of Executive Order 14203 states that “(a) Any transaction that evades or avoids, has the purpose of evading or avoiding, causes a violation of, or attempts to violate any of the prohibitions set forth in this order is prohibited”; and “(b) Any conspiracy formed to violate any of the prohibitions set forth in this order is prohibited.”

Importantly, these sanctions apply globally to U.S. persons and cover the provision or receipt of any funds, goods, or services, including digital services like digital marketing and sales. Notably, strong precedent exists for the fact that prohibited transactions include the provision of digital services under U.S. sanctions.⁷ Therefore, as set forth below, Amazon’s ongoing provision of services to Ms. Albanese, regardless of whether such service is free, represents a prohibited service that must be immediately discontinued.

Amazon Should No Longer Make Any Payments to or for the Benefit of Ms. Albanese

Executive Order 14203 and its implementing regulations at 31 C.F.R. Part 528 clearly prohibit the transfer of any funds by a U.S. person “to or for the benefit of” a blocked person, such as Ms. Albanese. As reflected in 31 C.F.R. Part 528, this prohibition covers both direct and indirect interests as well as direct and indirect transfers, all of which must be reported pursuant to 31 C.F.R. § 501.603.

Amazon currently lists the following five publications authored or co-authored by Ms. Albanese in various formats (hardcover, paperback, Kindle, and audio), three of which also appear on her personal Amazon page:⁸

1. *Palestinian Refugees in International Law* (Oxford University Press, 2020) by Francesca Albanese and Lex Takkenberg (Hardcover, Paperback, Kindle)
2. *J’Accuse* (Fuori Scena, 2023) by Francesca Albanese and Christian Elia (Paperback, Kindle, Audible)
3. *Quando Il Mondo Dorme* (Rizzo Libri, 2025) by Francesca Albanese (Kindle and Audible)
4. *A Moon Will Rise from the Darkness* (Pluto Press, 2025) by Francesca Albanese, Mandy Turner, Lex Takkenberg, Richard Falk, John Dugard, and Michael Lynk (Paperback and Kindle)

⁷ See, e.g., *Enforcement Release, OFAC* (July 8, 2020), <https://ofac.treasury.gov/media/44311/download?inline> (involving Amazon); *Enforcement Release, OFAC* (February 18, 2021), <https://ofac.treasury.gov/media/54341/download?inline> (involving BitPay, Inc.) (emphasizing that in both decisions the low-dollar value of the subject transactions was not a mitigating factor given that the prohibition broadly applies to the provision of all services, including those provided at minimal value or even free of charge); See also *Settlement Agreement between OFAC and Apple, Inc.*, OFAC (November 25, 2019), <https://ofac.treasury.gov/recent-actions/20191125> (involving Apple).

⁸ Francesca P. Albanese, **Amazon** (last visited October 9, 2025), https://www.amazon.com/stores/author/B09N724P5F?ingress=0&visitId=4ee6a3c8-0e13-4ebf-802d-fdd1a25a2267&ref_=sr_ntt_srch_lnk_1.

5. *Dall'economia dell'occupazione all'economia del genocidio: Rapporto della Relatrice Special Onu per I diritti umani sui territori occupati da Israele (Italian Edition)* (Paper First, 2025) by Francesca Albanese (Kindle)

Amazon is clearly prohibited from transferring sales proceeds directly to Ms. Albanese. Moreover, if any proceeds are transferred to a third-party publisher for her benefit, this too constitutes a prohibited transaction under Executive Order 14203.

Amazon Should No Longer Provide Prohibited Services to Ms. Albanese

Executive Order 14203 and its implementing regulations at 31 C.F.R. Part 528 also strictly prohibit U.S. persons from providing any services (including digital services as clarified above) “to or for the benefit of” blocked persons like Ms. Albanese. Amazon’s e-commerce platform—including tools for publishing, promoting, selling, and distributing publications and a personal page for Ms. Albanese—constitutes such a prohibited “service” under U.S. sanctions laws. Amazon itself describes its “website features and other products and services” as “Amazon Services.”⁹

Accordingly, Amazon must review its relationship with Ms. Albanese, including her personal Amazon page and its hosting of her publications for sale, to avoid violations of Executive Order 14203, as her ongoing access to the e-commerce platform constitutes an unlicensed and prohibited transaction with a blocked person.

Moreover, Amazon itself has acknowledged that, as a matter of sanctions enforcement, blocked persons are prohibited from using its services. In July 2020, Amazon settled a claim with OFAC for potential civil liability over its provision of goods and services to persons located in sanctioned countries.¹⁰ While the context was slightly different, Amazon’s liability for providing e-commerce services “to or for the benefit” of Ms. Albanese is even stronger here where Ms. Albanese herself is subject to U.S. sanctions, as opposed to merely residing in a sanctioned country. In a similar case, Apple, Inc. settled with OFAC after it admitted to having provided services directly to a sanctioned entity.¹¹

Importantly, OFAC has not issued any General License under Executive Order 14203 authorizing the provision of e-commerce services, fee-based or otherwise. While OFAC has issued General License No. 8¹² with respect to Ms. Albanese, its authorizations are expressly

⁹ *Conditions of Use*, **Amazon** (Last updated May 30, 2025), <https://www.amazon.com/gp/help/customer/display.html?nodeId=GLSBYFE9MGKKQXXM>. See also *Amazon Services Business Solutions Agreement*, **Amazon** (Last visited October 9, 2025), <https://sellercentral.amazon.com/help/hub/reference/external/G1791> (discussing the terms and conditions governing access of businesses to Amazon “services”).

¹⁰ *OFAC Settles with Amazon.com, Inc. with Respect to Potential Civil Liability for Apparent Violations of Multiple Sanctions Programs*, **OFAC** (July 8, 2020), <https://ofac.treasury.gov/media/44311/download?inline>.

¹¹ *Settlement Agreement between OFAC and Apple, Inc.*, **OFAC** (November 25, 2019), <https://ofac.treasury.gov/recent-actions/20191125>.

¹² General License No. 8, **OFAC** (July 9, 2025), <https://ofac.treasury.gov/media/934491/download?inline>. None of the other six General Licenses issued under Executive Order 14023 applies to Amazon’s relationship with Ms. Albanese.

limited to transactions that are “ordinarily incident and necessary to the wind down of any transaction” involving the designated individual with a deadline of August 8, 2025. Accordingly, General License No. 8 is not relevant here. If anything, the issuance of this General License underscores OFAC’s intent to actively monitor, investigate, and enforce compliance by U.S. persons—including entities such as Amazon—with the prohibitions imposed under the sanctions regime.

Amazon Should Immediately Suspend Ms. Albanese’s Account For Violating Its Terms of Service

Despite being an OFAC-sanctioned person as of July 9, 2025, Ms. Albanese has continued to use Amazon services in violation of its terms of service which, as noted, state:

Sanctions and Export Policy: You may not use any Amazon Service if you are the subject of U.S. sanctions or of sanctions consistent with U.S. law imposed by the governments of the country where you are using Amazon Services.¹³

Clearly, the provision of services to Ms. Albanese not only violates U.S. sanctions laws but the aforementioned terms of use.

The “Information” and “Personal Communications” Exceptions do not Apply

The “information exception” under 50 U.S.C. § 1702(b)(3) and the corresponding OFAC regulation (31 C.F.R. § 528.205) does not apply, as Amazon’s conduct goes well beyond the protected import or export of informational materials. This exemption is intended to protect U.S. citizens’ access to information, not to permit commercial facilitation or economic benefits to sanctioned persons. OFAC has made clear that the exception does not extend to services that market, produce, or distribute such materials or that result in royalty payments or other financial benefits to a blocked person.¹⁴

Amazon’s platform promotes and sells Ms. Francesca Albanese’s publications, directly enhancing her revenue and conferring a financial benefit—activities that fall outside the scope of the informational materials exemption. The informational materials exception cannot be used to shield commercial publishing and royalty arrangements that directly confer value to a blocked person.

Likewise, the “personal communications” exception under 50 U.S.C. § 1702(b)(1) applies only to noncommercial exchanges that do not involve “the transfer of anything of value.” By processing book sales and royalty payments, Amazon enables a commercial transaction and transfer of value for the benefit of a blocked person. Accordingly, neither statutory exception shields Amazon’s conduct from OFAC’s prohibitions.

¹³ *Conditions of Use, Amazon* (Last updated May 30, 2025), <https://www.amazon.com/gp/help/customer/display.html?nodeId=GLSBYFE9MGKKQXXM>.

¹⁴ See, e.g., 31 C.F.R. § 560.210(c), illustrating OFAC’s narrow interpretation of § 1702(b)(3) in other programs.

Conclusion

In summary, we urge Amazon to immediately review any services currently being used by or on behalf of Ms. Albanese, including her personal Amazon page and the hosting of her publications for sale on Amazon's e-commerce platform, and to immediately deactivate them. This is required by your clear internal terms of use as well as external compliance obligations under U.S. sanctions laws—most notably under President Trump's Executive Order 14203—which, as you are aware, impose strict liability and expose violators to significant fines and penalties. Under OFAC's strict-liability standard, even unintentional violations expose Amazon to significant civil penalties. Immediate remediation is therefore essential to ensure compliance.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Dina Rovner', with a stylized flourish at the end.

Dina Rovner
Legal Advisor
United Nations Watch

Cc: The Honorable Marco Rubio, U.S. Secretary of State
Office of Foreign Assets Control, Enforcement Division, U.S. Department of Treasury
The Honorable Senator Ted Cruz