

Hidden in Plain Sight: Confronting the Muslim Brotherhood Network in America

Written Testimony of

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Chairman Grassley, Ranking Member Durbin, esteemed members of the Committee:

Thank you for the opportunity to testify on the topic of confronting the Muslim Brotherhood Network in America.

I. Introduction

The Muslim Brotherhood told us who they are and what they wish to achieve. We did not believe them.

The Muslim Brotherhood (*Ikhwan al-Muslimeen*) (“MB” or “the Brotherhood”) is the world’s “oldest and arguably most influential contemporary Islamist movement.”¹ The Brotherhood’s core tenet “views Islam as a complete and all-embracing system, governing all aspects of private and public life.”² The Brotherhood seeks a bottom-up, gradual Islamization of society with the objective of forming a purely Islamic society and political entity.³ The Brotherhood states its program in its own motto. “Allah is our objective; the Prophet is our leader; the Quran is our law; jihad is our way; dying in the way of Allah is our highest hope.”⁴ What that program means in practice appears in the words of Yusuf al-Qaradawi, the Brotherhood’s

¹ Lorenzo Vidino, *The Muslim Brotherhood in Austria*, GW Program on Extremism (Aug. 1, 2017), <https://extremism.gwu.edu/muslim-brotherhood-austria>; see also Lorenzo Vidino, *The Hamas Networks in America: A Short History*, GW Program on Extremism (Oct. 2023), <https://extremism.gwu.edu/sites/g/files/zaxdzs5746/files/2023-10/hamas-networks-final.pdf>.

² Vidino, *The Muslim Brotherhood in Austria*, *supra*.

³ Vidino, *The Muslim Brotherhood in Austria*, *supra*.

⁴ Ayaan Hirsi Ali, *The Quran Is Our Law; Jihad Is Our Way*, Wall St. J. (Feb. 18, 2011), reprinted at American Enterprise Institute, <https://www.aei.org/articles/the-quran-is-our-law-jihad-is-our-way/> (quoting the Muslim Brotherhood’s motto in full).

unofficial chief ideologue, who told a Muslim Arab Youth Association conference in Toledo, Ohio, in 1995 that Muslims “shall continue to fight the Jews ... until the Muslims will kill them,” who ruled that “martyrdom operations” against Israelis are “not in any way included in the framework of prohibited terrorism, even if the victims include some civilians,” and who in 2009 called Hitler’s murder of European Jews a “divine punishment” whose “next time will be at the hand of the believers.”⁵ Brotherhood positions on religious freedom, women’s rights, and gay rights follow from the same premise.⁶ The freedoms the Brotherhood’s American affiliates invoke to shield themselves are the first freedoms that program abolishes.

In 1991, the Muslim Brotherhood’s leadership described its work in North America as “a kind of grand Jihad in eliminating and destroying the Western civilization from within.”⁷ The FBI later seized that document from a senior operative’s home in Virginia.⁸

Thirty-five years later, the state of the nation shows the Brotherhood is largely succeeding in its objective of infiltrating American society from within. Its named affiliates, including mosques, schools, civil-rights groups, student organizations, and legal nonprofits, are now endemic to American civic life and are the cornerstones of the Brotherhood’s deliberate political strategy for the gradual establishment of Islamic governance, or *sharia*, in the West.

To grasp how deeply the Brotherhood has embedded itself here, and how it has consistently evaded legal scrutiny, this Committee must understand the tactics it employs.

⁵ Counter Extremism Project, “Yusuf al-Qaradawi,”

<https://www.counterextremism.com/extremists/yusuf-al-qaradawi> (last visited July 30, 2026) (compiling al-Qaradawi’s recorded statements and the underlying primary sources, including his 1995 remarks at a Muslim Arab Youth Association conference in Toledo, Ohio, his July 2003 statement on “martyrdom operations,” and his January 30, 2009 statement on Hitler); “Al-Qaradawi Speaks In Favor of Suicide Operations at an Islamic Conference in Sweden,” MEMRI (July 24, 2003), <https://www.memri.org/report/en/0/0/0/0/0/914.htm>; “Sheikh Yousuf Al-Qaradawi: Allah Imposed Hitler On the Jews to Punish Them,” MEMRI (Feb. 3, 2009), <https://www.memri.org/report/en/0/0/0/0/0/802/3062.htm>.

⁶ Vidino, *The Muslim Brotherhood in Austria*, supra (Brotherhood “positions on religious freedom, women rights, and gay rights are similarly problematic and at odds with European values”).

⁷ Mohamed Akram, An Explanatory Memorandum on the General Strategic Goal for the Group in North America May 19, 1991, page 21, [Explanatory Memorandum on the General Strategic Goal for the Group in North America](#). Government Exhibit 003-0085, *U.S. v. HLF*, No. 3:04-CR-240-G. United States District Court for the Northern District of Texas, 2008. Available at <https://www.investigativeproject.org/documents/20/an-explanatory-memorandum-on-the-general.pdf>.

⁸ John Rossomando, ‘Explanatory Memorandum’ Detractors Ignore Evidence About MB in America, Middle East F. (Mar. 1, 2017), <https://www.meforum.org/islamist-watch/explanatory-memorandum-detractors-ignore-evidence>.

Hamas, by the terms of its own 1988 Charter, is the Brotherhood's branch in the Palestinian territories.⁹ Founding documents from the U.S. Hamas support infrastructure show that a linchpin of the network's strategy rests on the manipulation of the freedoms Americans enjoy. A Brotherhood internal document known as "The Project" directs adherents to penetrate existing institutions, build coalitions with sympathetic actors, and use the guise of civil rights and liberal democracy to shield their activities from scrutiny.¹⁰

It is therefore unsurprising that, in nearly every instance, MB-affiliated entities respond to legal scrutiny by invoking the First Amendment. A closer look at their nationwide litigation tactics, however, reveals that this invocation is the principal mechanism by which the network has evaded the discovery, regulatory oversight, and civil accountability the law plainly authorizes.

This testimony has two parts. The first examines what Muslim Brotherhood-linked entities have done in recent years: exploited tax-exempt status, accepted government grant funding, and embedded themselves in American schools. The second explains the litigation tactics that keep these entities one step ahead of meaningful investigation and accountability.

II. An Overview of the Muslim Brotherhood's *Modus Operandi* and the Modern Manifestations of MB Movements

The Brotherhood's strategy is no secret. Its own internal documents set out a multigenerational campaign of "civilizational jihad" to transform Western societies from within, turning democracy's strongest defenses (free speech, free association, religious liberty, and the protections of civil society) into instruments for advancing the Brotherhood's objectives.¹¹

Operations in Europe and North America are guided by a deliberate political strategy for the gradual establishment of Islamic governance, or *sharia*, in the West.

⁹ Hamas, *The Covenant of the Islamic Resistance Movement* (Aug. 18, 1988), in The Avalon Project, Lillian Goldman L. Libr., Yale L. Sch., https://avalon.law.yale.edu/21st_century/hamas.asp. ("The Islamic Resistance Movement is one of the wings of Moslem Brotherhood in Palestine. Moslem Brotherhood Movement is a universal organization which constitutes the largest Islamic movement in modern times.")

¹⁰ "The Muslim Brotherhood Project: Towards a Worldwide Strategy for Islamic Policy (1982)," translated by Scott Burgess (based on the French text published in Sylvain Besson, *La conquête de l'Occident: Le projet secret des islamistes* (Éditions du Seuil, 2005), 193–205), first published serially in *The Daily Ablution* in December 2005, available as an appendix to "The Muslim Brotherhood's Strategic Entryism into the United States," Institute for the Study of Global Antisemitism and Policy (ISGAP), Nov. 17, 2025, page 7, [The Muslim Brotherhood's Strategic Entryism Into the United States: A Systemic Analysis](https://isgap.org/wp-content/uploads/2025/11/MB-Project-Final-251117-01.pdf). Available at <https://isgap.org/wp-content/uploads/2025/11/MB-Project-Final-251117-01.pdf>.

¹¹ Rossomando, Explanatory Memorandum Detractors Ignore Evidence About MB in America, *supra*.

Two key Brotherhood internal documents set forth this plan. “The Project” (1982), laid out a multi-decadal program to expand Islamist influence through three principal means: penetrating existing institutions, building coalitions with sympathetic actors, and cultivating parallel social structures.¹² It directed adherents to make tactical use of the democratic freedoms like speech, association, and civic participation that Western societies would never knowingly extend in service of such ends.¹³

The second document, the 1991 “Explanatory Memorandum,” was recovered during the FBI’s investigation into the network’s U.S.-based operations. It described the work to be done here in unambiguous terms: the gradual dilution and ultimate displacement of Western cultural and political influence, advanced through an organizational network spanning religious, social, and professional life.¹⁴

The state of U.S. civil society today makes plain that this strategy is, in many respects, succeeding. The U.S.-based Brotherhood infrastructure operates through a series of nonprofit entities whose institutional purpose, regardless of what their public-facing mission statements may say, is to advance the Brotherhood’s objectives in this country.¹⁵ For example, the Council on American-Islamic Relations (“CAIR”) was born of a conspiratorial meeting of key U.S.-based Brotherhood leaders and was established as a civil-rights front, designed to lend Western legitimacy to the Palestine Committee’s work on American soil.¹⁶ American Muslims for Palestine (“AMP”) is the offshoot of the Islamic Association for Palestine (“IAP”), which was

¹² “The Muslim Brotherhood’s Strategic Entryism into the United States,” Institute for the Study of Global Antisemitism and Policy (ISGAP), Nov. 17, 2025, page 7, [The Muslim Brotherhood’s Strategic Entryism Into the United States: A Systemic Analysis](https://isgap.org/wp-content/uploads/2025/11/MB-Project-Final-251117-01.pdf). Available at <https://isgap.org/wp-content/uploads/2025/11/MB-Project-Final-251117-01.pdf>.

¹³ “The Muslim Brotherhood Project: Towards a Worldwide Strategy for Islamic Policy (1982),” available at the Institute for the Study of Global Antisemitism and Policy (ISGAP), page xiv, 2, 2025, [The Muslim Brotherhood’s Strategic Entryism Into the United States: A Systemic Analysis](https://isgap.org/wp-content/uploads/2025/11/MB-Project-Final-251117-01.pdf). Available at <https://isgap.org/wp-content/uploads/2025/11/MB-Project-Final-251117-01.pdf>.

¹⁴ Government’s Memorandum in Support of Its Trial Brief Regarding the Admissibility of Co-Conspirator Statements, *United States v. Holy Land Foundation for Relief and Development*, No. 3:04-CR-240-G (N.D. Tex. May 29, 2007); Lorenzo Vidino, “The Hamas Networks in America: A Short History,” GW Program on Extremism, October 2023, page 7 <https://extremism.gwu.edu/sites/g/files/zaxdzs5746/files/2023-10/hamas-networks-final.pdf>.

¹⁵ Lorenzo Vidino, “The Hamas Networks in America: A Short History,” *Program on Extremism at George Washington*, October 2023, <https://extremism.gwu.edu/sites/g/files/zaxdzs5746/files/2023-10/hamas-networks-final.pdf>.

¹⁶ Attachment A, List of Unindicted Co-conspirators and/or Joint Venturers, *United States v. Holy Land Foundation for Relief and Development*, No. 3:04-CR-240-G, Doc. No. 656-2 (N.D. Tex. May 29, 2007), [available at United States v. Holy Land Foundation](https://caselaw.findlaw.com/court/us-5th-circuit/1541982.html), 624 F.3d 685 (5th Cir. 2010), <https://caselaw.findlaw.com/court/us-5th-circuit/1541982.html>.

found liable for material support to Hamas.¹⁷ AMP functions today as one of the Brotherhood's principal propaganda arms in the United States.¹⁸ The broader U.S. network includes the North American Islamic Trust ("NAIT"), ICNA, ISNA, MAS, and MSA, among others.¹⁹ This testimony focuses on the recent activities of CAIR and AMP.

Government agencies and private citizens alike have sought to uncover the full scope of these entities' activities through litigation and investigation, only to be met by reflexive First Amendment and other constitutional objections. The activities recounted below are not *just* speech, and the constitutional invocation is dishonest and doctrinally unsound.

III. CAIR's Association with Designated Terrorists and Terrorist Organizations Is Not New, and It Is Not Protected Speech.

CAIR's engagement with designated foreign terrorists is ongoing, not historical. The examples that follow document conduct that may violate U.S.

¹⁷ American Muslims for Palestine (AMP), ADL, "American Muslims for Palestine (AMP) | ADL," ADL, November 27, 2024, [American Muslims for Palestine \(AMP\) | ADL](#); Lorenzo Vidino, "The Hamas Networks in America: A Short History," GW Program on Extremism, October 2023, page 9–14, https://extremism.gwu.edu/sites/g/files/zaxdzs5746/files/2025-11/CAIR_Revised.pdf.

¹⁸ See, e.g., *American Muslims for Palestine (AMP)*, NGO Monitor (May 10, 2025), <https://ngo-monitor.org/ngos/american-muslims-for-palestine-amp/> (providing examples of AMP's propaganda).

¹⁹ "The Muslim Brotherhood Project: Towards a Worldwide Strategy for Islamic Policy (1982)," available at the Institute for the Study of Global Antisemitism and Policy (ISGAP), page 39, 2025, [The Muslim Brotherhood's Strategic Entryism Into the United States: A Systemic Analysis](#). The organizations named are the North American Islamic Trust ("NAIT"), the Islamic Circle of North America ("ICNA"), the Islamic Society of North America ("ISNA"), the Muslim American Society ("MAS"), and the Muslim Students Association ("MSA"). ISNA, MSA, and NAIT appear in Attachment 1 to the 1991 Explanatory Memorandum, which lists them among "our organizations and the organizations of our friends." Akram, An Explanatory Memorandum, *supra*, Attachment 1. ISNA and NAIT also appear on the government's list of unindicted co-conspirators and/or joint venturers in the Holy Land Foundation prosecution. See Attachment A, List of Unindicted Co-conspirators and/or Joint Venturers, *United States v. Holy Land Foundation*, *supra*. NAIT holds title to mosque and school properties throughout the United States. MAS was incorporated in Illinois in 1993; a 2004 *Chicago Tribune* investigation reported that Brotherhood leaders created it as a more visible organ for their work in the United States, and its early leadership included Ahmad Elkadi, a former head of the U.S. Brotherhood branch. Noreen S. Ahmed-Ullah, Sam Roe & Laurie Cohen, "A Rare Look at Secretive Brotherhood in America," *Chicago Tribune* (Sept. 19, 2004). ICNA grew out of South Asian MSA members influenced by Abu'l A'la Mawdudi and the Jamaat-e-Islami of Pakistan, an allied Islamist movement organizationally distinct from the Egyptian Brotherhood. See Lorenzo Vidino, *The Muslim Brotherhood in America: A Brief History*, GW Program on Extremism (July 2025), <https://extremism.gwu.edu/sites/g/files/zaxdzs5746/files/2025-07/The%20Muslim%20Brotherhood%20in%20America.pdf>.

sanctions law, which prohibits certain interactions with designated Foreign Terrorist Organizations (“FTOs”) and Specially Designated Global Terrorists (“SDGTs”).

A. CAIR Ohio’s Executive Director Hosts Panel with Designated Terrorist

In October 2025, the Executive Director of CAIR’s Ohio chapter chaired a virtual panel hosted by Al-Zaytouna, a Beirut-based Brotherhood-aligned institution established in 2004.^{20,21} Although Al-Zaytouna describes itself as an independent research institution, this independence claim is belied by its record of platforming designated terrorists.²² Al-Zaytouna has maintained a systematic institutional relationship with Hamas leadership, served as a publisher and distributor of Hamas’s self-authored strategic narratives, provided a platform for the endorsement and active participation of multiple designated Hamas SDGTs, and reproduced Hamas’s official propaganda messaging across its own publications and events.²³

For example, Al-Zaytouna has published content authored by at least three individuals who were SDGTs at the time of the content’s publication. In 2014, Al-Zaytouna published a volume entitled “Islamic Resistance Movement–Hamas: Studies of Thought and Experience” (English edition published 2017), featuring chapters authored by former Hamas Political Bureau head Khalid Mashaal,²⁴ Ismail

²⁰ Algemeiner, “CAIR-Ohio Director Moderates Event With US-Designated Hamas Terrorist,” Algemeiner.com, October 28, 2025, [CAIR-Ohio Director Moderates Event With US-Designated Hamas Terrorist | Algemeiner.com](https://www.algemeiner.com/2025/10/28/cair-ohio-director-moderates-event-us-designated-hamas-terrorist/). Available at <https://www.algemeiner.com/2025/10/28/cair-ohio-director-moderates-event-us-designated-hamas-terrorist/>.

²¹ Al-Zaytouna Centre, “The Centre,” Al-Zaytouna Centre, May 4, 2026, <https://eng.alzaytouna.net/the-centre/>.

²² Algemeiner, “CAIR-Ohio Director Moderates Event With US-Designated Hamas Terrorist,” Algemeiner.com, October 28, 2025, [CAIR-Ohio Director Moderates Event With US-Designated Hamas Terrorist | Algemeiner.com](https://www.algemeiner.com/2025/10/28/cair-ohio-director-moderates-event-us-designated-hamas-terrorist/). Available at <https://www.algemeiner.com/2025/10/28/cair-ohio-director-moderates-event-us-designated-hamas-terrorist/>.

²³ See, e.g., “The Islamic Resistance Movement (Hamas): Studies of Thoughts & Experience - Al-Zaytouna Centre,” Al-Zaytouna Centre, August 31, 2020, [The Islamic Resistance Movement \(Hamas\): Studies of Thoughts & Experience - AL-Zaytouna Centre](https://mohsensaleh.net/wp-content/uploads/2017/08/Book_Hamas_Thought_Experience_Full.pdf); full English text available at https://mohsensaleh.net/wp-content/uploads/2017/08/Book_Hamas_Thought_Experience_Full.pdf. (Al-Zaytouna lists Hamas official propaganda for sale on its website).

²⁴ “The Islamic Resistance Movement (Hamas): Studies of Thoughts & Experience - AL-Zaytouna Centre,” Al-Zaytouna Centre, August 31, 2020, [The Islamic Resistance Movement \(Hamas\): Studies of Thoughts & Experience - AL-Zaytouna Centre](https://mohsensaleh.net/wp-content/uploads/2017/08/Book_Hamas_Thought_Experience_Full.pdf). ; full English text available at https://mohsensaleh.net/wp-content/uploads/2017/08/Book_Hamas_Thought_Experience_Full.pdf ; see also Al-Zaytouna Centre, “New Release: Islamic Resistance Movement Hamas: Studies of Thought and Experience,” August 15, 2017, <https://eng.alzaytouna.net/2017/08/15/new-release-islamic-resistance-movement-hamas-studies-thought-experience>; “SDGT Designations | Office of Foreign Assets Control,” Office of Foreign Assets Control, U.S. Department of the Treasury (last visited July 30, 2026), [SDGT Designations | Office of Foreign Assets Control](https://www.dft.gov/sdgt-designations).

Haniyeh,²⁵ Mousa Abu Marzook²⁶ and Usama Hamdan.²⁷ Khalid Mashaal was a founding member of Hamas, the head of Hamas’s external leadership, and resided in luxury outside of Gaza.²⁸ Mashaal’s half-brother Mufid Abdulkader was a major fundraiser for Hamas and was convicted in the *Holy Land Foundation* case (the largest terror financing case in U.S. history) and sentenced to twenty years in prison.²⁹ Mashaal and Haniyeh were both indicted by the U.S. Department of Justice for their involvement in the October 7th attacks.³⁰ Ismail Haniyeh had strong ties to Iran’s leadership and was the chairman of Hamas’s Politburo from 2017 until his reported death in 2024 in Iran.³¹ Mousa Abu Marzook was a founder of Hamas and a senior member of Hamas’s political bureau.³² The men’s words published in this volume represent Hamas’s own account of its ideology, strategy, and operations.

Al-Zaytouna’s editorial relationship with these individuals went beyond compilation. In March 2013, Al-Zaytouna published a standalone paper by Mashaal titled “Hamas Political Thought and Stances in Light of the Arab Uprisings,”

²⁵ State Department Terrorist Designations of Ismail Haniyeh, Harakat al-Sabireen, Liwa al-Thawra, and Harakat Sawa’d Misr (HASM), U.S. Department of State, January 31, 2018, <https://2017-2021.state.gov/state-department-terrorist-designations-of-ismail-haniyeh-harakat-al-sabireen-liwa-al-thawra-and-harakat-sawad-misr-hasm/index.html>.

²⁶ “Sanctions List Search,” U.S. Department of the Treasury, Office of Foreign Assets Control (last visited July 30, 2026), <https://sanctionssearch.ofac.treas.gov/Details.aspx?id=3754>.

²⁷ “U.S. Designates Five Charities Funding Hamas And Six Senior Hamas Leaders as Terrorist Entities,” U.S. Department of The Treasury, August 22, 2003, [U.S. Designates Five Charities Funding Hamas and Six Senior Hamas Leaders as Terrorist Entities | U.S. Department of the Treasury](https://www.treasury.gov/press-releases/jr082203). Available at <https://home.treasury.gov/news/press-releases/js672>.

²⁸ “Khaled Mashal, Hamas’ ‘External’ Leader, Is a Controversial Figure, as Documented in Documents Found by the IDF in the Gaza Strip,” The Amit Terrorism and Intelligence Research Institute at the Israeli Intelligence Heritage and Commemoration Center, April 6, 2025, [Khaled Mashal, Hamas’ “external” leader, is a controversial figure, as documented in documents found by the IDF in the Gaza Strip](https://www.terrorism-info.org.il/en/khaled-mashal-hamas-external-leader-is-a-controversial-figure-as-documented-in-documents-found-by-the-idf-in-the-gaza-strip/). Available at <https://www.terrorism-info.org.il/en/khaled-mashal-hamas-external-leader-is-a-controversial-figure-as-documented-in-documents-found-by-the-idf-in-the-gaza-strip/>.

²⁹ “Federal Judge Hands Downs Sentences in Holy Land Foundation Case,” May 27, 2009, [Federal Judge Hands Downs Sentences in Holy Land Foundation Case | United States Department of Justice](https://www.justice.gov/opa/pr/federal-judge-hands-downs-sentences-holy-land-foundation-case); “Half-brother of Hamas Leader Released From US Prison,” *Israel National News*, December 13, 2024, [Half-brother of Hamas leader released from US prison | Israel National News](https://www.israelnationalnews.com/news/400695). Available at <https://www.justice.gov/archives/opa/pr/federal-judge-hands-downs-sentences-holy-land-foundation-case>; <https://www.israelnationalnews.com/news/400695>.

³⁰ “Justice Department Announces Terrorism Charges Against Senior Leaders,” September 3, 2024, [Justice Department Announces Terrorism Charges Against Senior Leaders of Hamas](https://www.justice.gov/archives/opa/pr/justice-department-announces-terrorism-charges-against-senior-leaders-hamas). Available at <https://www.justice.gov/archives/opa/pr/justice-department-announces-terrorism-charges-against-senior-leaders-hamas>.

³¹ Justice Department Announces Terrorism Charges Against Senior Leaders of Hamas, U.S. Dep’t of Justice, *supra*.

³² “Moussa Mohammed Abu Marzouk,” Counter Extremism Project (last visited July 30, 2026), [Moussa Mohammed Abu Marzouk | Counter Extremism Project](https://www.counterextremism.com/extremists/moussa-mohammed-abu-marzouk). Available at <https://www.counterextremism.com/extremists/moussa-mohammed-abu-marzouk>.

originally presented at Al-Zaytouna's 2012 Beirut conference.³³ Al-Zaytouna's website states: "After the conference, Mashaal himself edited and updated the paper and sent it to Al-Zaytouna recently for publication,"³⁴ establishing direct editorial collaboration between Al-Zaytouna and a designated SDGT. Separately, Al-Zaytouna published a standalone paper by Haniyeh in May 2017, produced through what a footnote describes as "interviews conducted via e-mail by Mohsen Muhammad Saleh from Beirut, Lebanon, with Isma'il Haniyeh in Gaza, Palestine," with "correspondence [beginning] on 19/12/2013" and "the text [being] approved by Mr. Haniyeh on 11/3/2014."³⁵ This constitutes months of direct consultation between Al-Zaytouna's director and a designated SDGT.

The pattern continued. In January 2025, Al-Zaytouna published an Arabic translation of " Hamas: Unwritten Chapters" (343 pages), described as "a valuable addition to Hamas's self-vision," which examines Hamas's "liberation ideology" including its use of "military resistance, particularly martyrdom operations."³⁶ On November 7, 2023, one month after the October 7th attack, Al-Zaytouna re-promoted the 2014/2017 Hamas volume under the title "The Most Prominent and Comprehensive Reference Book on Hamas Movement (Free Download)," making the full text, including chapters by three designated SDGTs, available globally at no cost.³⁷ Al-Zaytouna maintains a dedicated Ismail Haniyeh author-archive page documenting at least six publications and events featuring him, including a

³³ Al-Zaytouna Centre, "Document: Khalid Mish'al: Hamas Political Thought and Stances in Light of the Arab Uprisings," AL-Zaytouna Centre, March 19, 2013 ("The document was originally a paper presented at the conference: 'The Islamists in the Arab World and the Palestinian Issue, In Light of the Arab Uprisings,' which was held by al-Zaytouna in Beirut on 28 & 29/11/2012"), [Document: Khalid Mish'al: Hamas Political Thought and Stances in Light of the Arab Uprisings - AL-Zaytouna Centre](https://eng.alzaytouna.net/2013/03/19/khalid-mishal-hamas-political-thought-and-stances-in-light-of-the-arab-uprisings/). Available at <https://eng.alzaytouna.net/2013/03/19/khalid-mishal-hamas-political-thought-and-stances-in-light-of-the-arab-uprisings/> (last visited July 30, 2026).

³⁴ Al-Zaytouna Centre, "Document: Khalid Mish'al: Hamas Political Thought and Stances in Light of the Arab Uprisings," AL-Zaytouna Centre, March 19, 2013, [Document: Khalid Mish'al: Hamas Political Thought and Stances in Light of the Arab Uprisings - AL-Zaytouna Centre](https://eng.alzaytouna.net/2013/03/19/khalid-mishal-hamas-political-thought-and-stances-in-light-of-the-arab-uprisings/). Available at <https://eng.alzaytouna.net/2013/03/19/khalid-mishal-hamas-political-thought-and-stances-in-light-of-the-arab-uprisings/>.

³⁵ Al-Zaytouna Centre, "Paper: Hamas: An Analysis of the Vision and Experience in Power ... Ismail Haniyyah," AL-Zaytouna Centre, May 6, 2017, [Paper: Hamas: An Analysis of the Vision and Experience in Power ... Ismail Haniyyah](https://eng.alzaytouna.net/2017/05/06/paper-hamas-analysis-vision-experience-power/). Available at <https://eng.alzaytouna.net/2017/05/06/paper-hamas-analysis-vision-experience-power/>.

³⁶ Al-Zaytouna Centre, " Hamas Unwritten Chapters (Arabic)," AL-Zaytouna Centre, January 21, 2025, [Hamas Unwritten Chapters \(Arabic\) - AL-Zaytouna Centre](https://eng.alzaytouna.net/2025/01/20/hamas-unwritten-chapters-arabic/). Available at <https://eng.alzaytouna.net/2025/01/20/hamas-unwritten-chapters-arabic/>.

³⁷ Al-Zaytouna Centre, "The Most Prominent and Comprehensive Reference Book on Hamas Movement (Free Download)," AL-Zaytouna Centre, November 9, 2023, [The Most Prominent and Comprehensive Reference Book on Hamas Movement \(Free Download\) - AL-Zaytouna Centre](https://eng.alzaytouna.net/2023/11/07/the-most-prominent-and-comprehensive-reference-book-on-hamas-movement-free-download/). Available at <https://eng.alzaytouna.net/2023/11/07/the-most-prominent-and-comprehensive-reference-book-on-hamas-movement-free-download/>.

November 3, 2021 webinar at which he presented his paper “ Hamas's Future Vision for the Advancement of the Palestinian National Project.”³⁸

That is the institution CAIR-Ohio's Executive Director chose to promote when he participated in Al-Zaytouna's October 2025 panel. Khalid Turaani, appointed Executive Director of CAIR-Ohio in June 2024, appeared on a virtual panel convened by Al-Zaytouna titled “Palestinians Abroad and Regional and International Strategic Transformations in Light of Operation al-Aqsa Flood.”³⁹ Operation al-Aqsa Flood is Hamas's name for the October 7th attacks.⁴⁰ Turaani moderated a panel at this event, where Majed al-Zeer, who was designated as an SDGT by the Department of the Treasury⁴¹ thirteen months prior to the panel as Hamas's representative and fundraiser in Europe, and Sami al-Arian, who pleaded guilty in 2006 to conspiracy to provide services to Palestinian Islamic Jihad, also appeared.⁴² The event adopted Hamas's operational terminology and addressed diaspora strategic repositioning.⁴³

CAIR responded to this incident by issuing a press release characterizing Turaani's participation as “an oversight by an employee who unknowingly

³⁸ Al-Zaytouna Centre, "Ismail Haniyyah Archives," <https://eng.alzaytouna.net/tag/ismail-haniyyah/> (retrieved May 13, 2026) (Al-Zaytouna author-tag archive page listing publications and events featuring Haniyeh as a contributor, including the 2014 Arabic and 2017 English editions of *Islamic Resistance Movement–Hamass: Studies of Thought and Experience*; the November 2023 post-October 7 re-promotion of that volume; Haniyeh's May 2017 standalone paper *Hamass: An Analysis of the Vision and Experience in Power*; and Al-Zaytouna's November 3, 2021 webinar at which Haniyeh personally presented); see also Al-Zaytouna Centre, "Isma'il Haniyyah Presents Hamas's Future Vision for the Advancement of the Palestinian National Project in a Webinar Held by al-Zaytouna Centre," November 5, 2021, <https://eng.alzaytouna.net/2021/11/05/ismail-haniyyah-presents-hamass-future-vision-for-the-advancement-of-the-palestinian-national-project-in-a-webinar-held-by-al-zaytouna-centre/>.

³⁹ Al-Zaytouna Centre, “Panel Discussion: Palestinians Abroad and Regional and International Strategic Transformations in Light of Operation al-Aqsa Flood,” AL-Zaytouna Centre, October 27, 2025, [Panel Discussion: Palestinians Abroad and Regional and International Strategic Transformations in Light of Operation al-Aqsa Flood - AL-Zaytouna Centre](https://eng.alzaytouna.net/2025/10/24/panel-discussion-palestinians-abroad-and-regional-and-international-strategic-transformations-in-light-of-operation-al-aqsa-flood-2/). Available at <https://eng.alzaytouna.net/2025/10/24/panel-discussion-palestinians-abroad-and-regional-and-international-strategic-transformations-in-light-of-operation-al-aqsa-flood-2/>.

⁴⁰ Ambassador Alan Baker, “Israel Under Fire – the ‘Al-Aqsa Flood’ Slogan and the October 7 Massacre,” Jerusalem Center for Security and Foreign Affairs, September 15, 2024, [Israel Under Fire – The “Al-Aqsa Flood” Slogan and the October 7 Massacre](https://jcfa.org/article/israel-under-fire-the-al-aqsa-flood-slogan-and-the-october-7-massacre/). Available at <https://jcfa.org/article/israel-under-fire-the-al-aqsa-flood-slogan-and-the-october-7-massacre/>.

⁴¹ “Majed al-Zeer,” OpenSanctions.org (last visited July 30, 2026), [Majed al-Zeer - OpenSanctions](https://www.opensanctions.org/entities/NK-FaGTYj6GcFhX6axKxVnBde/). Available at <https://www.opensanctions.org/entities/NK-FaGTYj6GcFhX6axKxVnBde/>.

⁴² Press Release, U.S. Dep't of Just., No. 06-221, “Sami Al-Arian Pleads Guilty to Conspiracy to Provide Services to Palestinian Islamic Jihad” (Apr. 17, 2006), https://www.justice.gov/archive/opa/pr/2006/April/06_crm_221.html.

⁴³ Maya Sulkin, “CAIR Official Joins Hamas Leader at ‘Al-Aqsa Flood’ Event,” *The Free Press* (blog), October 28, 2025, [CAIR Official Joins Hamas Leader at ‘Al-Aqsa Flood’ Event](https://www.thefp.com/p/cair-official-joins-hamas-leader-al-aqsa-flood-event). Available at <https://www.thefp.com/p/cair-official-joins-hamas-leader-al-aqsa-flood-event>.

participated in a virtual event hosted by a Lebanese think-tank. . . in his personal capacity and not as a representative of CAIR-Columbus.”⁴⁴ The same press release referred to al-Zeer as “a British individual who may have been recently sanctioned by the Treasury Department,” and never named him.⁴⁵

The record contradicts each of these characterizations. The “personal capacity” claim is contradicted by Al-Zaytouna’s own event listing, which identifies Turaani as session chair,⁴⁶ and by every publicly available profile, which identifies him solely as CAIR-Ohio Executive Director.⁴⁷ The characterization that al-Zeer “may have been recently sanctioned” minimizes the fact that al-Zeer was designated as an SDGT on October 7, 2024, over one year before the event, in a Treasury press release widely available in U.S. and international media.⁴⁸ Al-Zeer did not treat the designation as uncertain either. Within three days he issued his own press release rejecting the accusations as “absolutely false,” told Al Jazeera the sanctions were “madness,” and announced that he had retained a legal team to challenge them.⁴⁹ CAIR said nothing

⁴⁴ Khalid Turaani, “CAIR-Ohio Addressing Oversight by Employee After Personal Participation in Think-Tank Event Featuring Sanctioned Individual,” CAIR-Ohio, October 29, 2025, <https://cair-ohio.com/cair-ohio-addressing-oversight-by-employee-after-personal-participation-in-think-tank-event-featuring-sanctioned-individual/>.

⁴⁵ Khalid Turaani, “CAIR-Ohio Addressing Oversight by Employee After Personal Participation in Think-Tank Event Featuring Sanctioned Individual,” CAIR-Ohio, October 29, 2025, [CAIR-Ohio Addressing Oversight By Employee After Personal Participation in Think-Tank Event Featuring Sanctioned Individual](https://cair-ohio.com/cair-ohio-addressing-oversight-by-employee-after-personal-participation-in-think-tank-event-featuring-sanctioned-individual/). Available at <https://cair-ohio.com/cair-ohio-addressing-oversight-by-employee-after-personal-participation-in-think-tank-event-featuring-sanctioned-individual/>.

⁴⁶ Al-Zaytouna Centre, Panel Discussion: Palestinians Abroad and Regional and International Strategic Transformations in Light of Operation al-Aqsa Flood, *supra*.

⁴⁷ See, e.g., CAIR-Ohio, “Meet Our Team - CAIR-Ohio,” March 5, 2026, [Meet Our Team - CAIR-Ohio](https://www.facebook.com/turaani1/); Khaled Tuurani, Facebook, <https://www.facebook.com/turaani1/> (last visited May 18, 2026) (Tuurani’s personal Facebook lists him as the Executive Director of CAIR-Ohio); Khaled Tuurani (@turaanikhalid), Instagram, <https://www.instagram.com/turaanikhalid/> (last visited May 18, 2026) (Instagram biography lists Turaani as Executive Director of CAIR Ohio); Khalid Turaani, LinkedIn, <https://www.linkedin.com/in/khalid-turaani-a3149342> (last visited May 18, 2026).

⁴⁸ “Treasury Targets Significant International Hamas Fundraising Network,” U.S. Department of The Treasury, October 7, 2024, [Treasury Targets Significant International Hamas Fundraising Network](https://www.treasury.gov/news/press-releases/jy2632); Anna Stanley, “Influential U.K. NGO Head, Majed Al-Zeer, Finally Designated by U.S. for Links to Hamas,” Middle East Forum, October 10, 2024, [Influential U.K. NGO Head, Majed Al-Zeer, Finally Designated by U.S. for Links to Hamas - Middle East Forum](https://www.meforum.org/fwi/fwi-news/influential-uk-ngo-head-majed-al-zeer-finally-designated-by-u-s-for-links-to-hamas). Available at <https://home.treasury.gov/news/press-releases/jy2632>; <https://www.meforum.org/fwi/fwi-news/influential-uk-ngo-head-majed-al-zeer-finally-designated-by-u-s-for-links-to-hamas>.

⁴⁹ Al Jazeera Staff, “Prominent Palestinian Activist Slams US Sanctions as ‘Madness,’” Al Jazeera (Oct. 11, 2024), <https://www.aljazeera.com/news/2024/10/11/prominent-palestinian-activist-slams-us-sanctions-as-madness> (al-Zeer stating “It is madness,” rejecting the accusations as “absolutely false,” describing the press release he issued on October 10, 2024, and stating that he had “already begun, with the support of a legal team, the necessary legal procedures to challenge these baseless allegations”); see “Treasury Targets Significant International Hamas Fundraising Network,” U.S. Dep’t of the Treasury (Oct. 7, 2024), *supra*.

at the time. A review of CAIR's national and CAIR-Ohio press releases identifies no statement addressing the designation when it issued in October 2024, and CAIR's first public comment on al-Zeer came thirteen months later, in the press release quoted above, which declined to name him.⁵⁰ The "oversight" characterization is inconsistent with the fact that Al-Zaytouna's Hamas affiliations are evident from its own website, which includes multiple publications featuring three SDGT authors, Hamdan's homepage endorsement, and an events archive documenting Haniyeh's participation.⁵¹

CAIR's engagement with Al-Zaytouna is not an isolated incident, it is part of a pattern of support for designated FTOs and SDGTs.

B. CAIR's Symbiotic Relationship with the International Union of Muslim Scholars.

CAIR's engagement with the International Union of Muslim Scholars (IUMS) follows the same pattern. IUMS is the Muslim Brotherhood's transnational scholarly authority and maintains a close relationship with the recently designated Egyptian Muslim Brotherhood ("EMB").⁵²

The IUMS was founded in 2004 by Yusuf al-Qaradawi, who is viewed as the most important leader of the Global Muslim Brotherhood and the movement's "de facto spiritual leader."⁵³ Dr. Matthew Levitt, Director of the Stein Program on Counterterrorism and Intelligence at The Washington Institute, called Qaradawi

⁵⁰ A review of CAIR's national press-release archive, https://www.cair.com/press_releases/, and CAIR-Ohio's press releases, <https://cair-ohio.com/> (both last visited July 30, 2026), identifies no statement addressing al-Zeer's October 7, 2024 designation. CAIR's only located public comment concerning al-Zeer is the CAIR-Ohio release of October 29, 2025, cited supra.

⁵¹ Al-Zaytouna Centre, "Home - AL-Zaytouna Centre," AL-Zaytouna Centre, May 4, 2026, [AL-Zaytouna Centre](#); "The Islamic Resistance Movement (Hamas): Studies of Thoughts & Experience - AL-Zaytouna Centre," AL-Zaytouna Centre, August 31, 2020, [The Islamic Resistance Movement \(Hamas\): Studies of Thoughts & Experience - AL-Zaytouna Centre](#); Al-Zaytouna Centre, "Our Authors - AL-Zaytouna Centre," AL-Zaytouna Centre, March 6, 2025, <https://eng.alzaytouna.net/our-authors/>.

⁵² Lorenzo Vidino & Sergio Altuna, *The Egyptian Branch of the Muslim Brotherhood in America: Yesterday and Today*, Program on Extremism at Geo. Wash. U. (Jan. 2026), pages 32-33, <https://extremism.gwu.edu/sites/g/files/zaxdzs5746/files/2026-01/The%20Egyptian%20Branch%20of%20the%20Muslim%20Brotherhood%20in%20America.pdf>.

⁵³ *Tariq Ramadan Center To Hold International Conference; Many Global Muslim Brotherhood Luminaries To Attend*, Campus Watch, Middle E. F. (Mar. 12, 2013), <https://www.meforum.org/campus-watch/tariq-ramadan-center-to-hold-international>; Influence Watch, "International Union of Muslim Scholars (IUMS) - Influence Watch," April 27, 2026, [International Union of Muslim Scholars \(IUMS\) - Influence Watch](#); "International Union of Muslim Scholars - Global Influence Operations Report," Global Influence Operations Report (GIOR) (last visited July 30, 2026), [International Union of Muslim Scholars - Global Influence Operations Report](#).

“one of the most public figureheads of the radical wing of the Muslim Brotherhood.”⁵⁴ Qaradawi served as IUMS President from its founding until his resignation in August 2022, weeks before his death in September 2022.⁵⁵ Qaradawi’s record included serving as a major shareholder in the Al Taqwa Bank, which U.S. Treasury officials described as “financing and facilitating” Hamas and al-Qaeda.⁵⁶ Qaradawi stated that suicide bombings targeting Israeli civilians qualify as “martyrdom operations” and stated: “The Israelis might have nuclear bombs, but we have the children bomb.”⁵⁷

Qaradawi’s death did not change the institution. The IUMS’s current Secretary-General, Ali al-Qaradaghi, a protégé of Qaradawi, is a naturalized Qatari citizen and Qatar University professor who has publicly endorsed Hamas.⁵⁸ In 2015, al-Qaradaghi stated, “We view Hamas from the perspective of the Palestinian cause. Hamas is defending the rights of the nation.”⁵⁹ IUMS also maintains institutional ties to Hamas senior leadership. In 2022, IUMS Board of Trustees members hosted Ismail

⁵⁴ Sudarsan Raghavan and Joby Warrick, “How a 91-year-old imam came to symbolize the feud between Qatar and its neighbors,” *Washington Post*, June 27, 2017, https://www.washingtonpost.com/world/middle-east/how-a-91-year-old-imam-came-to-symbolize-feud-between-qatar-and-its-neighbors/2017/06/26/601d41b4-5157-11e7-91eb-9611861a988f_story.html (quoting Matthew Levitt of the Washington Institute for Near East Policy describing Qaradawi as “one of the most public figureheads of the radical wing of the Muslim Brotherhood”); reproduced and discussed in Counter Extremism Project, “Yusuf al-Qaradawi’s Ties to Extremists,” <https://www.counterextremism.com/yusuf-al-qaradawi> (retrieved May 13, 2026).

⁵⁵ Influence Watch, “International Union of Muslim Scholars (IUMS) - Influence Watch,” April 27, 2026, [International Union of Muslim Scholars \(IUMS\) - Influence Watch](https://www.influencewatch.org/organization/international-union-of-muslim-scholars-iums/); “International Union of Muslim Scholars - Global Influence Operations Report,” Global Influence Operations Report (GIOR) (last visited July 30, 2026), [International Union of Muslim Scholars - Global Influence Operations Report](https://www.global-influence-ops.com/wiki/international-union-of-muslim-scholars/). Available at <https://www.influencewatch.org/organization/international-union-of-muslim-scholars-iums/>; <https://www.global-influence-ops.com/wiki/international-union-of-muslim-scholars/>.

⁵⁶ Influence Watch, “International Union of Muslim Scholars (IUMS) - Influence Watch,” April 27, 2026, [International Union of Muslim Scholars \(IUMS\) - Influence Watch](https://www.influencewatch.org/organization/international-union-of-muslim-scholars-iums/). Available at <https://www.influencewatch.org/organization/international-union-of-muslim-scholars-iums/>.

⁵⁷ Influence Watch, “International Union of Muslim Scholars (IUMS) - Influence Watch,” April 27, 2026, [International Union of Muslim Scholars \(IUMS\) - Influence Watch](https://www.influencewatch.org/organization/international-union-of-muslim-scholars-iums/); *Yusuf al-Qaradawi’s Ties to Extremism*, Counter Extremism Project, Ali al-Qaradaghi, Counter Extremism Project, <https://www.counterextremism.com/extremists/ali-al-qaradaghi> (last visited May 18, 2026).

⁵⁸ Ali al-Qaradaghi, Counter Extremism Project, <https://www.counterextremism.com/extremists/ali-al-qaradaghi> (last visited May 18, 2026).

⁵⁹ Hassan Obeid, “Qaradaghi: We support action against Houthis,” *Al-Monitor*, April 19, 2015, <https://www.al-monitor.com/originals/2015/04/palestine-international-union-of-muslim-scholars-alqaradaghi.html> (interview with IUMS Secretary-General Ali al-Qaradaghi conducted April 12, 2015) (full quoted passage: “We view Hamas from the perspective of the Palestinian cause, which must remain the pre-eminent cause not just for the union but for all Arabs, Muslims and free humanitarians of the world. We stand against oppression, tyranny, displacement and detention tactics that Israeli occupation forces rely upon; this is a humanitarian and international stance. Hamas is defending the rights of the nation, and the nation must stand by those who defend its pre-eminent cause.”), reproduced and discussed in Counter Extremism Project, “Ali al-Qaradaghi,” <https://www.counterextremism.com/extremists/ali-al-qaradaghi> (retrieved May 13, 2026).

Haniyeh at the IUMS's Istanbul premises, where they were photographed receiving him.⁶⁰ On October 7, 2023, the day of Hamas's heinous terrorist attack on Israel, the IUMS platformed Haniyeh again. He delivered an address at an IUMS online event titled "Forum of Umma Scholars in Support of Operation Aqsa Flood."⁶¹

On March 28, 2025, the IUMS's Ijtihad and Fatwa Committee issued a ten-point fatwa, or religious decree,⁶² declaring that it is obligatory for every capable Muslim in the Islamic world to wage armed jihad against the occupation in Palestine.⁶³ In December 2025, the Middle East Media Research Institute ("MEMRI") documented an IUMS-published article predicting the extermination of Jews by 2033.⁶⁴

The IUMS website (iumsonline.org) republishes CAIR press releases, Islamophobia reports, and statements by CAIR officials on an ongoing basis,

⁶⁰ Altuna Sergio, "Beyond Islamic Guidance: Qatar-based IUMS as an Agitator in the Israel-Hamas War," *George Washington University Program on Extremism*, December 2023, figure 1, <https://extremism.gwu.edu/sites/g/files/zaxdzs5746/files/2023-12/beyond-islamic-guidance.pdf>; see also "Hamas chief meets International Union of Muslim Scholars in Istanbul," İLKHA (Ilke News Agency), 2022, <https://ilkha.com/english/latest/hamas-chief-meets-international-union-of-muslim-scholars-in-istanbul-16822>.

⁶¹ Altuna Sergio, "Beyond Islamic Guidance: Qatar-based IUMS as an Agitator in the Israel-Hamas War," *George Washington University Program on Extremism*, December 2023, [Beyond Islamic Guidance](https://extremism.gwu.edu/sites/g/files/zaxdzs5746/files/2023-12/beyond-islamic-guidance.pdf). Available at <https://extremism.gwu.edu/sites/g/files/zaxdzs5746/files/2023-12/beyond-islamic-guidance.pdf>.

⁶² "Fatwa," in *Merriam-Webster Dictionary*, April 11, 2026, [FATWA Definition & Meaning - Merriam-Webster](https://www.merriam-webster.com/dictionary/fatwa). Available at <https://www.merriam-webster.com/dictionary/fatwa>.

⁶³ International Union of Muslim Scholars, Ijtihad and Fatwa Committee, "Fatwa of the Committee for Ijtihad and Fatwa at the International Union of Muslim Scholars regarding 'The Ongoing Aggression on Gaza and the Suspension of the Ceasefire,'" March 28, 2025, <https://iumsonline.org/en/archives/135549> (IUMS's own English-language publication of the ten-point fatwa, which the IUMS site dates April 1, 2025, point 1 declaring that "it is obligatory for all Muslims and Muslim nations to engage in jihad against the Zionist entity"); MEMRI translation and analysis at "Fatwa By International Union Of Muslim Scholars (IUMS), Based In And Funded By Qatar, Declares 'Armed Jihad' Against Israel Obligatory For All Muslims, Calls To Urgently Form 'Islamic Military Alliance' Against Israel," Middle East Media Research Institute, March 31, 2025, <https://www.memri.org/reports/fatwa-international-union-muslim-scholars-iums-based-and-funded-qatar-declares-armed-jihad>; see also "Muslim scholar union calls for 'armed Jihad' against Israel," *Jerusalem Post*, March 30, 2025, <https://www.jpost.com/middle-east/article-849253>; David Andrew Weinberg, "Qatar Tacitly Approves Muslim Scholars' Call for 'Armed Jihad' Against Israel," *Foundation for Defense of Democracies*, April 11, 2025, https://www.fdd.org/analysis/policy_briefs/2025/04/11/qatar-tacitly-approves-muslim-scholars-call-for-armed-jihad-against-israel/.

⁶⁴ "IUMS publishes antisemitic article predicting extermination of the Jews by 2033," MEMRI, December 2025, [Qatar-Backed International Union Of Muslim Scholars \(IUMS\) Publishes Antisemitic Article Saying: Humanity Has Realized That The Jews Are A Threat To The World: They Will All Be Gone By 2033](https://www.memri.org/reports/qatar-backed-international-union-of-muslim-scholars-iums-publishes-antisemitic-article-saying-humanity-has-realized-that-the-jews-are-a-threat-to-the-world-they-will-all-be-gone-by-2033); see also "Algerian Muslim Brotherhood figure claims there will be no more Jews by 2033," *Defend Jerusalem*, December 2025, <https://defendjerusalem.com/algerian-muslim-brotherhood-figure-claims-there-will-be-no-more-jews-by-2033/>.

providing CAIR with a global amplification platform through a Muslim Brotherhood-affiliated institution. This occurred on at least three instances. On July 28, 2025, the IUMS's English-language website published “Wave of Attacks on U.S. Mosques Reflects Rising Islamophobia Amid Israeli Aggression on Gaza,” quoting CAIR Deputy National Director Edward Ahmed Mitchell at length and republishing CAIR complaint data, including the claim that “in 2024 alone, [CAIR's] offices received over 8,600 complaints related to discrimination and attacks against Muslims, the highest number since it began documenting such cases in 1996.”⁶⁵ On April 26, 2022, the IUMS English-language website published an article titled “Discrimination against Muslim Americans rose by 9% in 2021: Report,” quoting CAIR Executive Director Nihad Awad and republishing findings from CAIR’s Islamophobia report (including that CAIR received 6,720 complaints in 2021).⁶⁶ In July 2022, the IUMS Arabic-language website published a CAIR statement condemning a U.S. government program, quoting Deputy National Director Mitchell.⁶⁷

The IUMS provides global distribution of CAIR’s press releases, reports, and statements by named CAIR executives to its network of 90,000 member scholars.⁶⁸ The IUMS’s republication of CAIR content is not incidental, as the articles are published on the IUMS’s official website, attributed to CAIR by name, and quote CAIR officials by title. CAIR does not mention the IUMS in its own announcements, but the record of shared ties extends beyond the content amplification and into the organizations’ personnel.

For example, in 2012, CAIR’s co-founder and Executive Director Nihad Awad joined Yusuf al-Qaradawi on stage at a press conference in Qatar.⁶⁹ As described

⁶⁵ “Wave of Attacks on U.S. Mosques Reflects Rising Islamophobia Amid Israeli Aggression on Gaza,” IUMS, July 28, 2025, iumsonline.org/en/archives/134246 (last visited Aug. 3, 2026). The item was originally published under the ContentDetails.aspx path; IUMS migrated to a new platform in or around December 2025 and the article is now served at the /en/archives/ path above.

⁶⁶ “Discrimination Against Muslim Americans Rose by 9% in 2021: Report,” IUMS, April 26, 2022, <https://iumsonline.org/en/archives/134757>.

⁶⁷ “CAIR Statement Condemning U.S. Atheism Promotion Program,” IUMS Arabic-language website, July 11, 2022, [تدين برنامجاً أمريكياً يروج للإلحاد في الدول الإسلامية \(CAIR\) مجلس العلاقات الإسلامية الأمريكية](https://iumsonline.org/archives/106951), iumsonline.org/archives/106951 (last visited Aug. 3, 2026) (quoting CAIR Deputy National Director Edward Ahmed Mitchell). The item was originally published under the ContentDetails.aspx path; IUMS migrated to a new platform in or around December 2025 and it is now served at the /archives/ path above.

⁶⁸ Sergio Altuna, *Beyond Islamic Guidance: Qatar-based IUMS as an Agitator in the Israel-Hamas War*, Program on Extremism at Geo. Wash. U., page 4 (Dec. 2023), <https://extremism.gwu.edu/sites/g/files/zaxdzs5746/files/2023-12/beyond-islamic-guidance.pdf>.

⁶⁹ “The Council on American Islamic Relations (CAIR) | ADL,” ADL, December 23, 2024, [The Council on American Islamic Relations \(CAIR\)](https://www.adl.org/resources/background/council-american-islamic-relations-cair). Available at <https://www.adl.org/resources/background/council-american-islamic-relations-cair>.

above, Al-Qaradawi was the founding president of the IUMS, affiliated with the Muslim Brotherhood, and expressed support for Hamas and Hezbollah.⁷⁰ Awad also eulogized Abdul-Majid al-Zindani,⁷¹ a U.S.-designated SDGT⁷² and supporter of Osama bin Laden whom the IUMS website describes as a “founding member of the IUMS.”⁷³

As of July 2026, all previously published CAIR content remains accessible on the IUMS website.⁷⁴ That content survived a site migration. IUMS moved to a new web platform in or around December 2025, abandoning the URL structure under

⁷⁰ Sergio Altuna, "Beyond Islamic Guidance: Qatar-based IUMS as an Agitator in the Israel-Hamas War," George Washington University Program on Extremism, December 2023, at 3–5, <https://extremism.gwu.edu/sites/g/files/zaxdzs5746/files/2023-12/beyond-islamic-guidance.pdf> ("IUMS is the brainchild of the late Yusuf Al-Qaradawi...[h]ealed by Qaradawi until 2018," and documenting his "lifelong affiliation with the Muslim Brotherhood"); Counter Extremism Project, "Yusuf al-Qaradawi's Ties to Extremists," [accessed May 17, 2026](https://www.counterextremism.com/yusuf-al-qaradawi), <https://www.counterextremism.com/yusuf-al-qaradawi> (until November 2018, "president of the International Union of Islamic Scholars (IUMS)"; "unofficial chief ideologue of the Muslim Brotherhood"; documenting his support for Hamas, his chairmanship of the U.S.-designated Union of Good charity that funneled money to Hamas, and his praise for Hezbollah during the 2006 Israel-Lebanon war); Anti-Defamation League, "Sheik Yusuf al-Qaradawi: Theologian of Terror," updated May 3, 2013, <https://www.adl.org/sites/default/files/Sheik-Yusuf-al-Qaradawi-2013-5-3-v1.pdf> (documenting Qaradawi's Muslim Brotherhood affiliation since 1942, his 1973 and 2002 refusals of the Brotherhood's General Guide position despite his role as its "premier spiritual guide," his public expressions of support for Hamas and Hezbollah, and his 2009 *Fiqh al-Jihad* legitimizing Palestinian suicide bombings against Israel).

⁷¹ Nihad Awad, Facebook post (in Arabic), April 22, 2024, quoted and translated in "CAIR Leader Eulogizes Bin Laden's 'Spiritual Leader,'" Middle East Forum, May 2024, <https://www.meforum.org/65925/cair-leader-eulogizes-bin-laden-spiritual-leader> (eulogizing Abdul-Majid al-Zindani: "We belong to Allah and to Him we shall return. The Islamic nation has lost one of its biggest emblems and men with the passing of Sheikh Alam and worker Abdul Majeed Al-Zindani after he dedicated his life to the service of the Quran and the manifestation of its miracles that never cease.").

⁷² "United States Designates Bin Laden Loyalist," U.S. Department of The Treasury, February 24, 2004, [United States Designates bin Laden Loyalist | U.S. Department of the Treasury](https://home.treasury.gov/news/press-releases/js1190). Available at <https://home.treasury.gov/news/press-releases/js1190>.

⁷³ "The Union Extends Its Condolences on the Passing of Sheikh Abdul-Majid Bin Aziz Al-Zindani," IUMS, April 23, 2024, [The Union extends its condolences on the passing of Sheikh Abdul-Majid bin Aziz Al-Zindani](https://iumsonline.org/en/archives/134020). Available at <https://iumsonline.org/en/archives/134020>.

⁷⁴ "Discrimination Against Muslim Americans Rose by 9% in 2021: Report," IUMS, April 26, 2022, iumsonline.org/en/archives/134757; "Wave of Attacks on U.S. Mosques Reflects Rising Islamophobia Amid Israeli Aggression on Gaza," IUMS, July 28, 2025, iumsonline.org/en/archives/134246; "CAIR Statement Condemning U.S. Atheism Promotion Program," IUMS Arabic-language website, July 11, 2022, iumsonline.org/archives/106951 (all last visited Aug. 3, 2026). The first two items were originally published under the ContentDetails.aspx URL structure; IUMS migrated to a new platform in or around December 2025 and the items are now served at the /archives/ paths above. On the designation described in the text, see U.S. Department of State, "Terrorist Designations of Muslim Brotherhood Chapters," Jan. 13, 2026, state.gov. The blocking and transaction consequences are set by Executive Order 13224 and the Global Terrorism Sanctions Regulations, 31 C.F.R. §§ 594.201 and 594.204, ecfr.gov; OFAC's Fifty Percent Rule extends blocking to any entity owned fifty percent or more, directly or indirectly, by a blocked person.

which the CAIR items were originally published, and the items were carried onto the new site rather than dropped. On January 13, 2026, the U.S. Treasury Department designated Egyptian Muslim Brotherhood (“EMB”) as an SDGT for material support to Hamas, blocking the EMB’s property and interests in property within U.S. jurisdiction and prohibiting U.S. persons from dealing in them, including by providing services, under Executive Order 13224 and the Global Terrorism Sanctions Regulations, with the same prohibitions reaching any entity the EMB owns fifty percent or more. CAIR has issued no press release, website statement, or public communication acknowledging the designation or addressing its implications for CAIR’s relationship with IUMS, the institution founded by al-Qaradawi, the EMB spiritual leader whom many consider “the supreme religious and ideological authority for the Muslim Brotherhood.”⁷⁵ CAIR has not publicly disavowed its participation in IUMS-hosted programming.

The EMB designation is one of a widening set of actions against the network’s partners. The Treasury designated Samidoun in October 2024 and the Popular Conference for Palestinians Abroad in January 2026, and it designated the Egyptian, Jordanian, and Lebanese branches of the Muslim Brotherhood in January 2026.⁷⁶

The absence of any responsive action to the EMB designation is significant given CAIR’s institutional history and its public statement relating to the Al-Zaytouna event (*see* Section III.A *supra*). CAIR issues press releases on a continuous basis covering foreign-policy events well outside its civil-rights mandate, to include

⁷⁵ “Portrait of Sheikh Dr. Yusuf Abdallah al-Qaradawi, Senior Sunni Muslim Cleric, Affiliated With the Muslim Brotherhood,” The Amit Terrorism and Intelligence Research Institute at the Israeli Intelligence Heritage and Commemoration Center, February 27, 2011, [Portrait of Sheikh Dr. Yusuf Abdallah al-Qaradawi, senior Sunni Muslim cleric, affiliated with the Muslim Brotherhood - The Amit Terrorism and Intelligence Research Institute](https://www.terrorism-info.org.il/en/17948/). Available at <https://www.terrorism-info.org.il/en/17948/>.

⁷⁶ See U.S. Department of the Treasury, press release JY2646, October 15, 2024, home.treasury.gov (Samidoun); press release SB0368, January 21, 2026, home.treasury.gov (Popular Conference for Palestinians Abroad); and press release SB0357, January 13, 2026, home.treasury.gov (Egyptian and Jordanian branches of the Muslim Brotherhood); see also U.S. Department of State, Terrorist Designations of Muslim Brotherhood Chapters, January 13, 2026, state.gov. Available at <https://home.treasury.gov/news/press-releases/jy2646>; <https://home.treasury.gov/news/press-releases/sb0368>; <https://home.treasury.gov/news/press-releases/sb0357>; <https://www.state.gov/releases/office-of-the-spokesperson/2026/01/terrorist-designations-of-muslim-brotherhood-chapters>.

Syria,⁷⁷ settler sanctions,⁷⁸ the Assad regime's fall,⁷⁹ Israeli policies,⁸⁰ and Iran protests.⁸¹ CAIR's silence suggests either willful disregard or a deliberate decision not to sever a relationship that provides mutual institutional benefit.

CAIR's relationship with the IUMS is one piece of a larger pattern. CAIR also provides institutional resources, organizational credibility, and fiduciary authority infrastructure to a self-admitted Muslim Brotherhood operative whose services benefit the EMB and the Jordanian Muslim Brotherhood, both SDGTs.

C. Self-Admitted Muslim Brotherhood Member Manages CAIR-Related Entity That Controls Nearly Five Million Dollars in CAIR Real Estate

Esam Omeish is the chairman of CAIR's Washington Trust Foundation, a separate 501(c)(3) entity whose stated mission is to "support the charitable purpose of CAIR-Foundation Inc."⁸² He is also, by the formal designation of the Libyan House of Representatives, an "international member of the Muslim Brotherhood."⁸³

⁷⁷ "CAIR Press Releases: CAIR Welcomes NDAA'S Repeal of Syrian Sanctions, Calls for Removal of \$600 Million+ in New Funding for Israel's Crimes," CAIR, December 11, 2025, [CAIR Welcomes NDAA'S Repeal of Syrian Sanctions, Calls for Removal of \\$600 Million+ In New Funding for Israel's Crimes](https://www.cair.com/press_releases/cair-welcomes-ndaas-repeal-of-syrian-sanctions-calls-for-removal-of-600-million-in-new-funding-for-israels-crimes/). Available at https://www.cair.com/press_releases/cair-welcomes-ndaas-repeal-of-syrian-sanctions-calls-for-removal-of-600-million-in-new-funding-for-israels-crimes/.

⁷⁸ "CAIR Press Releases: CAIR Says U.S. Should Restore Sanctions on Israeli Settlers After West Bank Olive Harvest Attack," CAIR, November 4, 2025, [CAIR Says U.S. Should Restore Sanctions on Israeli Settlers After West Bank Olive Harvest Attack](https://www.cair.com/press_releases/cair-says-u-s-should-restore-sanctions-on-israeli-settlers-after-west-bank-olive-harvest-attack/). Available at https://www.cair.com/press_releases/cair-says-u-s-should-restore-sanctions-on-israeli-settlers-after-west-bank-olive-harvest-attack/.

⁷⁹ "CAIR Press Releases: CAIR Reaffirms Support for Syrian Freedom From Assad Regime, Calls on U.S. to Reassess Syria Policies," CAIR, December 5, 2024, [CAIR Reaffirms Support for Syrian Freedom from Assad Regime, Calls on U.S. to Reassess Syria Policies](https://www.cair.com/press_releases/cair-reaffirms-support-for-syrian-freedom-from-assad-regime-calls-on-u-s-to-reassess-syria-policies/). Available at https://www.cair.com/press_releases/cair-reaffirms-support-for-syrian-freedom-from-assad-regime-calls-on-u-s-to-reassess-syria-policies/.

⁸⁰ "CAIR Press Releases: CAIR Says U.S. Must Not Allow Israel to Continue Its Slaughter in Lebanon or Derail Ceasefire," CAIR, April 8, 2026, [CAIR Says U.S. Must Not Allow Israel to Continue Its Slaughter in Lebanon or Derail Ceasefire](https://www.cair.com/press_releases/cair-says-u-s-must-not-allow-israel-to-continue-its-slaughter-in-lebanon-or-derail-ceasefire/). Available at https://www.cair.com/press_releases/cair-says-u-s-must-not-allow-israel-to-continue-its-slaughter-in-lebanon-or-derail-ceasefire/.

⁸¹ "CAIR Press Releases: CAIR Opposes Latest March to War With Iran for Israel's Benefit, Says Iranian People Must Determine Their Future Without Internal Oppression or Foreign Interference," CAIR, January 14, 2026, [CAIR Opposes Latest March to War with Iran for Israel's Benefit, Says Iranian People Must Determine Their Future Without Internal Oppression or Foreign Interference](https://www.cair.com/press_releases/cair-opposes-latest-march-to-war-with-iran-for-israels-benefit-says-iranian-people-must-determine-their-future-without-internal-oppression-or-foreign-interference/). Available at https://www.cair.com/press_releases/cair-opposes-latest-march-to-war-with-iran-for-israels-benefit-says-iranian-people-must-determine-their-future-without-internal-oppression-or-foreign-interference/.

⁸² *Washington Trust Foundation*, Influence Watch, <https://www.influencewatch.org/non-profit/washington-trust-foundation/> (last visited May 16, 2026) (identifying Omeish as the Chairman of the Washington Trust Foundation).

From 2004 to 2008, Omeish served as national president of the Muslim American Society (“MAS”).⁸⁴ Federal prosecutors described MAS as having been “founded as the overt arm of the Muslim Brotherhood in America.”⁸⁵ That characterization is corroborated by MAS's own institutional history. The U.S. Brotherhood's Shura Council, then headed by Ahmed Elkadi, created MAS in a 1992 meeting attended by Mohammed Akef, the future *Murshid* (general guide) of the Egyptian Muslim Brotherhood.⁸⁶ Shaker Elsayed, a senior MAS official, has publicly acknowledged that “Ikhwan [Brotherhood] members founded MAS, but MAS went way beyond that point of conception” and has estimated that roughly 45 percent of MAS activists are Brotherhood members.⁸⁷ Elsayed's framing reflects the strategic adaptation at the heart of the U.S. Brotherhood network: organizations that share the Brotherhood's ideology, strategy, and personnel, but have deliberately distanced themselves from the formal command structure of the Egyptian Brotherhood in order to operate with ostensible legitimacy in the West. That ideological continuity without organizational subordination is exactly what “The Project” and the 1991 Explanatory Memorandum directed. As MAS president in 2004, Omeish wrote a letter to the Washington Post: “The moderate school of thought prevalent in the Muslim

⁸³ “Esam S. Omeish,” New Tolerance Campaign, December 1, 2025, [Esam S. Omeish - New Tolerance Campaign](https://www.newtolerance.org/esam-s-omeish/). Available at <https://www.newtolerance.org/esam-s-omeish/>.

⁸⁴ “Esam S. Omeish,” New Tolerance Campaign, December 1, 2025, <https://www.newtolerance.org/esam-s-omeish/> (identifying Omeish as national president of the Muslim American Society from 2004 to 2008); Jewish Onliner, *Alleged Muslim Brotherhood-Linked DAWN Appoints Omar Shakir as Executive Director*, Jewish Onliner (Feb. 26, 2026), <https://jewishonliner.org/p/alleged-muslim-brotherhood-linked-dawn-appoints-omar-shakir-as-executive-director> (documenting Omeish's MAS presidency); “Muslim American Society President Resigns From Virginia Commission — Outed by Videos,” Global Muslim Brotherhood Watch, September 28, 2007, <https://www.globalmbwatch.com/2007/09/28/muslim-american-society-president-resigns-from-virginia-commission-outed-by-videos/> (contemporaneous report identifying Omeish as sitting MAS national president at the time of his September 2007 resignation from the Virginia Commission on Immigration).

⁸⁵ Brief for the United States as Appellee n.13, *United States v. Benkahla*, 530 F.3d 300 (4th Cir. 2008) (No. 07-4778) (“MAS was founded as the overt arm of the Muslim Brotherhood in America.”) (citing Noreen S. Ahmed-Ullah, Sam Roe, and Laurie Cohen, “The New Face of the Muslim Brotherhood—The Muslim American Society,” *Chicago Tribune*, September 19, 2004). For the same proposition in a currently retrievable filing, see Amicus Curiae Brief of the Rieders Foundation and the Middle East Forum, *Parizer v. AJP Educational Foundation, Inc.*, No. 25-2366 (4th Cir. Dec. 30, 2025), 2025 U.S. 4th Cir. Briefs LEXIS 4152 (using the phrase “overt arm of the Muslim Brotherhood in America”).

⁸⁶ Lorenzo Vidino, *The New Muslim Brotherhood in the West* (Columbia Univ. Press 2010), chapter 7 (documenting the 1992 decision by the U.S. Brotherhood's Shura Council, then led by Ahmed Elkadi, to create MAS, with Mohammed Akef—the future *Murshid* of the Egyptian Muslim Brotherhood—present at the founding meeting); Noreen S. Ahmed-Ullah, Sam Roe, and Laurie Cohen, “The New Face of the Muslim Brotherhood—The Muslim American Society,” *Chicago Tribune*, September 19, 2004 (quoting Shaker Elsayed's acknowledgment that “Ikhwan members founded MAS,” and that 45 percent of MAS activists are MB).

⁸⁷ *Id.*

Brotherhood represents a significant trend in Islamic activism in the United States and the West, and we in MAS accordingly have been influenced by that moderate Islamic school of thought.”⁸⁸ In December 2016, Omeish published a Facebook tribute to the Muslim Brotherhood.⁸⁹

In 2017, Libya’s Defense and National Security Committee listed Omeish as number 29 among 75 individuals designated as terrorists, identifying him as an “international member of the Muslim Brotherhood.”⁹⁰

Omeish served as the director of the Dar al-Hijrah Islamic Center in Falls Church, Virginia.⁹¹ In early 2001, Omeish was one of the mosque officials who hired Anwar al-Awlaki as its imam.⁹² Al-Awlaki subsequently became a leading figure in al-Qaeda in the Arabian Peninsula (“AQAP”) and was linked to multiple terrorist plots, including the Fort Hood shooting and the attempted Christmas Day airline bombing. He was killed in a CIA drone strike in Yemen in 2011.⁹³

⁸⁸ Esam Omeish, “MAS President Letter to the Washington Post,” Muslim American Society press release, September 16, 2004, archived at

https://web.archive.org/web/20090919100921/http://www.masnet.org/pressroom_release.asp?id=1664.

⁸⁹ Sam Westrop, “Dar al-Hijrah Board Member Pens Muslim Brotherhood Tribute,” *Islamist Watch*, Dec. 2, 2016, <https://www.meforum.org/islamist-watch/51184/dar-al-hijrah-board-member-pens-muslim> (quotes the December 2016 Facebook tribute in full); *Algemeiner*, “Islamist Activist Asks Obama to Support Libyan Al Qaeda Group” (Mar. 22, 2016), <http://www.algemeiner.com/2016/03/22/islamist-activist-asks-obama-to-support-libyan-al-qaeda-group/> (documents Omeish’s own statements about his Brotherhood ties).

⁹⁰ “Esam S. Omeish,” New Tolerance Campaign, December 1, 2025, [Esam S. Omeish - New Tolerance Campaign](#); “The Muslim Brotherhood’s Campaign Against Libyan Presidential Candidate Khalifa Haftar in the US – American Mideast Coalition for Democracy,” August 15, 2022, [The Muslim Brotherhood’s Campaign Against Libyan Presidential Candidate Khalifa Haftar in the US](#). Available at <https://www.newtolerance.org/esam-s-omeish/>; <https://americanmideast.com/2022/08/15/the-muslim-brotherhoods-campaign-against-libyan-presidential-candidate-khalifa-haftar-in-the-us/>.

⁹¹ Sam Westrop, “Dar al-Hijrah Board Member Pens Muslim Brotherhood Tribute,” *Islamist Watch*, Dec. 2, 2016, <https://www.meforum.org/islamist-watch/51184/dar-al-hijrah-board-member-pens-muslim> (describing Omeish as Dar al-Hijrah board member); Chuck Ross, *The Omeish Family Hates Israel. And Tim Kaine Loves the Omeish Family*, Wash. Free Beacon (Nov. 8, 2023), <https://freebeacon.com/democrats/the-omeish-family-hates-israel-and-tim-kaine-loves-the-omeish-family/>.

⁹² Caryle Murphy, “Facing New Realities as Islamic Americans,” *Washington Post*, September 11, 2004, [washingtonpost.com/archive/politics/2004/09/12/facing-new-realities-as-islamic-americans](https://www.washingtonpost.com/archive/politics/2004/09/12/facing-new-realities-as-islamic-americans). The original four-page version remains available; the passage relied on here is at p. 4, [washingtonpost.com/wp-dyn/articles/A14497-2004Sep11_4.html](https://www.washingtonpost.com/wp-dyn/articles/A14497-2004Sep11_4.html) (“Omeish, one of the mosque officials who hired Aulaqi, said he is convinced that Aulaqi ‘has no inclination or active involvement in any events or circumstances that have to do with terrorism.’”). The hiring date is at p. 3 (“In early 2001, the mosque’s leaders ... hired Anwar al-Aulaqi”). Anwar al-Awlaki’s name is also rendered “Aulaqi” in some sources, including U.S. federal court filings, e.g., *Al-Aulaqi v. Obama*, 727 F. Supp. 2d 1 (D.D.C. 2010); *Al-Aulaqi v. Panetta*, 35 F. Supp. 3d 56 (D.D.C. 2014).

⁹³ Counter Extremism Project, “Anwar al-Awlaki’s Ties to Extremists,” <https://www.counterextremism.com/anwar-al-awlaki> (documenting al-Awlaki’s role as a senior AQAP

At a 2000 rally, Omeish told Washington-area Muslims to support “the jihad way.”⁹⁴ Seven years later, in August 2007, Virginia Governor Timothy Kaine appointed Omeish to the Virginia Commission on Immigration. Omeish was forced to resign within a month after video footage of the 2000 remarks surfaced.⁹⁵ On October 16, 2023, nine days after the Hamas October 7th attack, Omeish posted a poem in Arabic on Facebook expressing hope that “Jihad and the Mujahideen” would be victorious.⁹⁶ Omeish is an active participant in the U.S. Council of Muslim Organizations (“USCMO”), a coalition founded in 2014 whose members include CAIR, MAS, AMP, Islamic Circle of North America (“ICNA”), and over 35 other organizations.⁹⁷ Four of USCMO's eight founding organizations, CAIR, MAS, ICNA

figure and propagandist; his email correspondence with Major Nidal Hasan in the months preceding the November 5, 2009 Fort Hood shooting; and his operational ties to multiple terrorist plots); “Treasury Designates Anwar Al-Aulaqi, Key Leader of Al-Qa’ida in the Arabian Peninsula,” U.S. Department of the Treasury, July 16, 2010, <https://home.treasury.gov/news/press-releases/tg779> (Treasury designation press release identifying al-Aulaqi as a key AQAP operational leader); “Al Qaeda's Anwar al-Awlaki Killed in CIA Drone Strike,” ABC News, September 30, 2011, <https://abcnews.com/Blotter/anwar-al-awlaki-killed-officials-yemen-confirm-al/story?id=14638303> (reporting President Obama's announcement that al-Awlaki was killed in a U.S. strike in Al-Jawf Governorate, Yemen, on September 30, 2011, and the President's statement that the killing was “a major blow to Al-Qaeda's most active operational affiliate”); National Security Archive, “The Anwar al-Awlaki File, Explained,” February 14, 2025, <https://nsarchive.gwu.edu/briefing-book/2025-02-14/anwar-al-awlaki-file-explained> (compiling declassified U.S. government documents on al-Awlaki's AQAP role, the Fort Hood/Hasan correspondence, and the legal and operational record culminating in the September 30, 2011 strike).⁹⁴ Tim Craig, “Va. Muslim Activist Denies Urging Violence,” *Washington Post*, September 29, 2007, <http://www.washingtonpost.com/wp-dyn/content/article/2007/09/28/AR2007092800789.html>; “Esam S. Omeish,” New Tolerance Campaign, December 1, 2025, [Esam S. Omeish - New Tolerance Campaign](https://www.newtolerance.org/esam-s-omeish).

⁹⁵ Tim Craig, “Kaine Announces Dr. Esam Omeish's Resignation,” *Washington Post* Virginia Politics blog, Sept. 27, 2007, http://voices.washingtonpost.com/virginiapolitics/2007/09/kaine_announces_dr_esam_omeish.html; “Immigration official resigns after ‘jihad’ remark,” NBC News / AP, September 27, 2007, <https://www.nbcnews.com/id/wbna21016079>.

⁹⁶ <https://www.facebook.com/Esamomeish/posts/10161903442357269>. Chuck Ross, “The Omeish Family Hates Israel. And Tim Kaine Loves the Omeish Family,” *Washington Free Beacon*, Nov. 8, 2023, [freebeacon.com/democrats/the-omeish-family-hates-israel-and-tim-kaine-loves-the-omeish-family](https://www.freebeacon.com/democrats/the-omeish-family-hates-israel-and-tim-kaine-loves-the-omeish-family) (reporting the October 16, 2023 Facebook post and translating the line as a call to “give victory to the Jihad and the Mujahideen”); “Esam S. Omeish,” New Tolerance Campaign, Dec. 1, 2025, [newtolerance.org/esam-s-omeish](https://www.newtolerance.org/esam-s-omeish).

⁹⁷ “Founding Members,” U.S. Council of Muslim Organizations, https://uscmo.org/founding_members/ (USCMO's own listing of its eight founding member organizations: American Muslims for Palestine, Council on American-Islamic Relations, Islamic Circle of North America, Muslim Alliance in North America, Muslim American Society, Muslim Legal Fund of America, Muslim Ummah of North America, and The Mosque Cares); “USCMO Council Members,” U.S. Council of Muslim Organizations, https://uscmo.org/council_members/ (current full membership roster including the eight founding members alongside national organizations, local councils, relief organizations, mosques, and specialized organizations — totaling more than forty member entities as of retrieval May 13, 2026); “USCMO Delegation Meets Erdogan, Fosters Friendship Between US and Turkey,” U.S. Council of Muslim Organizations, September 7, 2020,

and AMP, are part of the U.S. Muslim Brotherhood network,⁹⁸ and CAIR was named as an unindicted co-conspirator in the *Holy Land Foundation* trial.⁹⁹

This is Omeish's public record. CAIR has entrusted him with the chairmanship of the Washington Trust Foundation. The Foundation's stated mission, in its own words to the IRS, is "to support the charitable purpose of CAIR-Foundation Inc."¹⁰⁰ Its 2024 return reports total assets of \$21,162,467 and net assets of \$6,236,291, built almost entirely on rental property income.^{101,102}

<https://web.archive.org/web/20240816123515/https://uscmo.org/2020/09/07/uscmo-delegation-meets-erdogan-fosters-friendship-between-us-and-turkey/> (USCMO's own press release identifying Esam Omeish as a member of the USCMO delegation to Turkish President Erdogan); "Endowment (Waqf) Conference 2025," U.S. Council of Muslim Organizations, https://uscmo.org/etn/endowment_waqf_conference_2025/ (listing Omeish as a speaker at USCMO's November 17, 2025 Waqf Conference).

⁹⁸ US Council of Muslim Organizations, "Founding Members," uscmo.org/founding_members (listing the eight founding members as American Muslims for Palestine, the Council on American-Islamic Relations, the Islamic Circle of North America, the Muslim Alliance in North America, the Muslim American Society, the Muslim Legal Fund of America, the Muslim Ummah of North America, and The Mosque Cares). Ehud Rosen, "U.S. Islamist Organizations," in *The Spider Web: The Roots of BDS and the Campaign to Delegitimize Israel*, ch. IV, Jerusalem Center for Security and Foreign Affairs, Oct. 21, 2018, jcf.org/the-spider-web/chapter-iv-delegitimization-in-the-united-states/islamist-organizations, profiles CAIR, MAS, ICNA and AMP and describes USCMO as a coalition "most of which are affiliated with the Muslim Brotherhood." That source does not address the remaining four founding members, and no count of seven is asserted here.

⁹⁹ List of Unindicted Co-conspirators and/or Joint Venturers, *United States v. Holy Land Foundation*, 624 F.3d 685 (5th Cir. 2010), <https://caselaw.findlaw.com/court/us-5th-circuit/1541982.html>.

¹⁰⁰ Washington Trust Foundation Inc., IRS Form 990 for tax year 2024 (EIN 52-1887951), filed Nov. 11, 2025, Schedule O, Part III line 2, projects.propublica.org/nonprofits/full_text/202513159349304086/IRS990ScheduleO ("ORGANIZATION MISSION TO SUPPORT THE CHARITABLE PURPOSE OF CAIR-FOUNDATION INC (CAIR FOUNDATION), A DISTRICT OF COLUMBIA NON-PROFIT CORPORATION"). The same return is addressed in care of Esam Omeish and lists him as chairman. Full filing at projects.propublica.org/nonprofits/organizations/521887951/202513159349304086/full (last visited Aug. 3, 2026).

¹⁰¹ Washington Trust Foundation Inc., IRS Form 990 for tax year 2024, *supra* note 100, Part X (reporting total assets of \$21,162,467, total liabilities of \$14,926,176 and net assets of \$6,236,291, and rental property income of \$127,411 as the organization's sole material revenue), projects.propublica.org/nonprofits/organizations/521887951/202513159349304086/full.

¹⁰² Omeish also heads Together We Serve, a nonprofit holding roughly \$4.36 million in assets that received \$950,000 from CAIR in 2017. Together We Serve Inc., IRS Form 990 filings (EIN 27-3747192, Fairfax, Virginia; tax-exempt since May 2015), available via ProPublica Nonprofit Explorer, <https://projects.propublica.org/nonprofits/organizations/273747192> (Together We Serve's IRS filings disclosing total assets of approximately \$4.36 million and confirming Esam Omeish as Director and President); CAIR Foundation, Inc., IRS Form 990 for fiscal year 2017, Schedule I (Grants and Other Assistance to Domestic Organizations), available via ProPublica Nonprofit Explorer, <https://projects.propublica.org/nonprofits/organizations/770646756> (CAIR Foundation's 2017 990 reporting a \$950,000 grant from CAIR Foundation, Inc. to Together We Serve Inc.).

These positions provide Omeish with institutional resources, organizational credibility, fiduciary authority, and access to CAIR's financial infrastructure, resources that enhance his capacity to operate on behalf of the Egyptian Muslim Brotherhood.¹⁰³ Conduct comparable in kind, such as providing services that enhance the operational capacity of a designated entity, if done so in coordination with or at the direction and control of the FTO, sustains material support liability under 18 U.S.C. § 2339B per *Holder v. Humanitarian Law Project*.¹⁰⁴

CAIR's headquarters is no longer wholly CAIR's. On February 13, 2026, CAIR recorded a Special Warranty Deed conveying an undivided forty-five percent interest in the building to the North American Islamic Trust.¹⁰⁵ The same day, it recorded a Memorandum of Agreement barring the sale or financing of the remaining interest without NAIT's written consent.¹⁰⁶ NAIT is an Islamic endowment that federal prosecutors named on the List of Unindicted Co-conspirators in the Holy Land Foundation terrorism-financing prosecution, and the district court found "ample evidence" supporting that listing.¹⁰⁷ Read together, the two instruments hand a minority stake in CAIR's own headquarters to that entity and give it a veto over what happens to the rest. Both are recorded public instruments, filed in the District of Columbia and retrievable by instrument number.

CAIR's proximity to designated persons extends to its own personnel. Longtime national board member, Nabil Sadoun, was ordered deported over ties to a Hamas-linked research group he co-founded with Mousa Abu Marzook;¹⁰⁸ and Ismail

¹⁰³ *Holder v. Humanitarian Law Project*, 561 U.S. 1, 14–15, 39–40 (2010).

¹⁰⁴ *Holder v. Humanitarian Law Project*, 561 U.S. 1, 30-32 (2010).

¹⁰⁵ Special Warranty Deed conveying an undivided forty-five percent interest in CAIR's headquarters to the North American Islamic Trust, recorded February 13, 2026, Instrument No. 2026014277, D.C. Recorder of Deeds. Retrievable by instrument number at [washington.dc.publicsearch.us](https://www.washington.dc.publicsearch.us) (last visited Aug. 4, 2026).

¹⁰⁶ Memorandum of Agreement barring the sale or financing of the remaining interest in CAIR's headquarters without the written consent of the North American Islamic Trust, recorded February 13, 2026, Instrument No. 2026014278, D.C. Recorder of Deeds. Retrievable by instrument number at [washington.dc.publicsearch.us](https://www.washington.dc.publicsearch.us) (last visited Aug. 4, 2026).

¹⁰⁷ List of Unindicted Co-conspirators, *United States v. Holy Land Foundation for Relief and Development*, No. 3:04-cr-240-G (N.D. Tex. May 29, 2007), investigativeproject.org. The district court found "ample evidence" supporting the listing, 2009 WL 10680203 (N.D. Tex. July 1, 2009).

¹⁰⁸ Scott Gordon, "Dallas Islamic Leader Deported," NBC 5 Dallas-Fort Worth, Feb. 19, 2010, [nbcdfw.com/news/local/dallas-islamic-leader-deported/1885892](https://www.nbcdfw.com/news/local/dallas-islamic-leader-deported/1885892) (reporting that Judge Anthony Rogers of the Executive Office for Immigration Review ordered Sadoun removed, that the judge "concluded Sadoun lied on government forms when he denied he was a member" of Hamas and the Muslim Brotherhood, that the decision "could not be appealed," and that the judge indicated there was evidence Sadoun contributed to the Holy Land Foundation). Sadoun, a longtime CAIR national board member, co-founded the United Association for Studies and Research with Hamas political leader Mousa Abu Marzook.

Royer, a CAIR communications specialist, was sentenced to twenty years imprisonment for his role in the Virginia Jihad Network.¹⁰⁹

Attempts by both government agencies and private plaintiffs to generate accountability for CAIR and its sister organization, AMP, have proven largely ineffective. This ineffectiveness can be attributed to nationwide litigation tactics which seek to evade discovery into their finances, silence critics and whistleblowers, and stymie law enforcement investigations.

IV. Dilatory Litigation Tactics Are Used as a Substantive Defense Mechanism to Shield MB-Affiliated Entities' Nefarious Activities

U.S.-based Muslim Brotherhood entities have turned the litigation process itself into a tool. They use it to obstruct law enforcement investigations, obscure illicit financial activities, and silence critics.

A. Muslim Brotherhood-Affiliated Entities Use Procedural Delay as a Substantive Defense

The *Boim* litigation in the Northern District of Illinois illustrates this pattern in stark detail. In 2004, the Boim family won a \$156 million Anti-Terrorism Act judgment against the Holy Land Foundation and the Islamic Association for Palestine for Hamas's murder of their teenage son David. Shortly after the district court entered judgment, IAP “announced they were closing.”¹¹⁰ Less than a year later, AMP emerged, populated by IAP's former leadership. The Seventh Circuit and the trial court have since allowed the Boims to proceed on the theory that AMP is a “disguised continuance”¹¹¹ of IAP and HLF, with the district court finding the Boims’ complaint “replete with factual allegations” supporting alter-ego status.¹¹² AMP's response has been systematic discovery obstruction. The Boims have been forced to file ten separate motions to compel or enforce discovery.¹¹³ In November 2024, the

¹⁰⁹ U.S. Department of Justice, “Randall Todd Royer and Ibrahim Ahmed Al-Hamdi Sentenced for Participation in Virginia Jihad Network,” April 9, 2004, [justice.gov](https://www.justice.gov/justice.gov) (twenty-year sentence); on Royer's CAIR employment, [InfluenceWatch](https://www.influencewatch.org/non-profit/council-on-american-islamic-relations-cair/). Available at https://www.justice.gov/archive/opa/pr/2004/April/04_crm_225.htm; <https://www.influencewatch.org/non-profit/council-on-american-islamic-relations-cair/>.

¹¹⁰ *Boim v. Am. Muslims for Palestine*, 9 F.4th 545, 555 (7th Cir. 2021). HLF shut down three years earlier after it was designated by the Treasury Department's Office of Foreign Asset Control and its assets were frozen.

¹¹¹ *Boim v. Am. Muslims for Palestine*, 9 F.4th 545, 555 (7th Cir. 2021).

¹¹² *Boim v. Am. Muslims for Palestine*, 9 F.4th 545 (7th Cir. 2021); *Boim v. Am. Muslims for Palestine*, 17-CV-3591 (N.D. Ill.) (DE 250 at 2).

¹¹³ *Boim v. Am. Muslims for Palestine*, (N.D. Ill.) (DE 56, 107, 272, 345, 386, 388, 405, 479, 489, 507), as well as motions to enforce existing orders — including a prior order compelling production of

magistrate judge ordered AMP to pay the Boims' fees and costs for litigating "baseless discovery disputes," citing the "prolonged course of fact discovery" and the court's "repeated warnings that it would strictly enforce Rule 37."¹¹⁴ The significance of this record cannot be overstated: even where a court has already found a \$156 million material support judgment, even where successor liability has been allowed to proceed, and even where the court has imposed monetary sanctions, the network's litigation strategy has continued to delay enforcement, now in its ninth year of post-pleading litigation, with a jury trial now set for February 8, 2027 to decide whether AMP is liable as the alter ego of the Islamic Association for Palestine and the Holy Land Foundation.¹¹⁵

Two lessons emerge from the *Boim* record, and both demand a congressional response. First, procedural delay has become a substantive defense. By filing serial motions, contesting every discovery request, and forcing plaintiffs to litigate the same issues across multiple courts, this network has learned that it can make accountability prohibitively expensive even when the underlying liability is clear. Second, this strategy works because federal nonprofit law lets it work. An organization adjudicated liable for material support can shutter, declare insolvency, and reconstitute as a new §501(c)(3) within months, with the same officers, the same donor base, and the same operational mission, leaving plaintiffs to relitigate alter-ego status from scratch. Until Congress closes the successor-organization loophole and creates real consequences for serial discovery obstruction in ATA cases, the *Boim* pattern will repeat.

The *Boim* litigation is not an isolated incident. In 2023, the Virginia Attorney General's Office launched an investigation into AMP's parent organization, Americans for Justice in Palestine ("AJP"), for failing to abide by the state's charitable solicitations law. Virginia's charitable solicitations law requires entities soliciting donations from within the state to submit certifications each year that "No funds have been or will knowingly be used, directly or indirectly, to benefit or provide support, in cash or in kind, to terrorists, terrorist organizations, terrorist activities, or the family members of any terrorist." Va. Code § 57-49(A1). AJP had failed to submit

AMP's donor records (DE 381–82).

¹¹⁴ *Boim v. Am. Muslims for Palestine*, 17-CV-3591 (N.D. Ill.) (DE 485 at 3).

¹¹⁵ A jury trial is set for February 8, 2027 to determine whether *American Muslims for Palestine* is liable as the alter ego of the Islamic Association for Palestine and the Holy Land Foundation. *Boim v. American Muslims for Palestine*, No. 1:17-cv-03591 (N.D. Ill.), Minute Entry of June 30, 2026 (Wood, J.) (DE 647) ("By agreement of the parties, jury trial set for 2/8/2027 at 9:00 AM"); see also "Judge Schedules 2027 Trial in Decades-Long Case Linking AMP to Hamas Murder of American Teen," Jewish Insider, July 2026, [jewishinsider.com](https://jewishinsider.com/2026/07/judge-schedules-2027-trial-in-decadeslong-case-linking-amp-to-hamas-murder-of-american-teen/). Available at <https://jewishinsider.com/2026/07/judge-schedules-2027-trial-in-decadeslong-case-linking-amp-to-hamas-murder-of-american-teen/>.

this certification for seven years.¹¹⁶ The Virginia Attorney General's Office commenced an investigation and issued civil investigative demands ("CIDs") to AMP for compliance.¹¹⁷ One CID requested information regarding AMP's donors.¹¹⁸

AMP did not comply. Represented by the same lawyers who represent it in *Boim*, AMP responded with the same dilatory tactics. The Virginia AG was forced to file a Motion to Enforce the CID, which AMP again did not comply with.¹¹⁹ The Richmond Circuit Court found AMP in civil contempt.¹²⁰ The court ordered AMP to pay the AG's "reasonable costs and attorney's fees" and stated that AMP's failure to comply with the Court's order would result in additional sanctions.¹²¹

After losing at every level in state court, AMP took the matter to federal court. Years into the state-court fight, AMP sued the Virginia Attorney General's office in federal court, raising a litany of constitutional claims that AMP said had not been properly decided in state court.¹²² The federal district court issued a preliminary injunction enjoining enforcement of the AG's CID because the merits of those constitutional claims had not been resolved.¹²³ The Virginia AG's office appealed.

The Virginia Court of Appeals rejected AMP's petition to prevent enforcement of the CID in July 2025.¹²⁴ On September 29, 2025, the Richmond Circuit Court held AMP in civil contempt and imposed \$1,000-per-day coercive fines until AMP produced its donor records; AMP then obtained emergency relief from the U.S. District Court for the Eastern District of Virginia on October 3, 2025, staying the contempt sanctions

¹¹⁶ *AJP Educ. Found. Inc. v. Miyares*, 25-CV-1617 (DE 15-1 at 12).

¹¹⁷ *AJP Educ. Found. Inc. v. Miyares*, 25-CV-1617 (DE 15 at 2-8) (Virginia Attorney General's response to AMP's motion for preliminary injunction, which details procedural history of investigation and noncompliance).

¹¹⁸ *AJP Educ. Found. Inc. v. Miyares*, 25-CV-1617 (DE 15 at 5).

¹¹⁹ *AJP Educ. Found. Inc. v. Miyares*, 25-CV-1617 (DE 15 at 8).

¹²⁰ "American Muslims for Palestine Found in Civil Contempt of Court," Lake Gaston Gazette-Observer, September 29, 2025, [American Muslims for Palestine Found in Civil Contempt of Court | News | lakegastongazette-observer.com](https://www.lakegastongazette-observer.com/news/article_cdf8db9e-3b17-4476-b80b-201cd4a8afb0.html). Available at https://www.lakegastongazette-observer.com/news/article_cdf8db9e-3b17-4476-b80b-201cd4a8afb0.html.

¹²¹ *AJP Educ. Found., Inc. v. Miyares*, 806 F. Supp. 3d 603, 616 (E.D. Va. 2025).

¹²² *AJP Educ. Found., Inc. v. Miyares*, 806 F. Supp. 3d 603, 617 (E.D. Va. 2025).

¹²³ *AJP Educ. Found., Inc. v. Miyares*, 806 F. Supp. 3d 603, 626 (E.D. Va. 2025) ("Without injunctive relief, AMP would have to choose between the lesser of two evils. On one hand, it could succumb to the AG's demand and disclose its donor lists before the appellate courts can rule on the constitutionality of the CID.").

¹²⁴ *In re: AJP Educational Foundation, Inc. d/b/a American Muslims for Palestine*, Va. Ct. App. (Dec. 2025) (rejecting AMP's petition to prevent immediate enforcement of the Virginia Attorney General's Civil Investigative Demand); see also Marc Rod, "Virginia attorney general petitions court to enforce order against American Muslims for Palestine," *Jewish Insider*, January 2025, <https://jewishinsider.com/2025/01/jason-miyares-american-muslims-for-palestine-terror-ties-financial-documents/>.

and enjoining enforcement of the CID to the extent it would compel disclosure of information protected by the First Amendment, in each case until the dispute is fully adjudicated through the Virginia state courts. The court explained that ruling in a memorandum opinion issued October 17, 2025.¹²⁵ On December 9, 2025, the Court of Appeals of Virginia ruled that AMP had procedurally defaulted its First Amendment arguments under Rule 5A:18, declining to reach the merits and leaving the Richmond Circuit Court judgment undisturbed.¹²⁶ AMP filed a petition for appeal at the Supreme Court of Virginia on February 6, 2026, which the Attorney General has opposed and which remains pending.¹²⁷ Virginia state courts have now twice ruled against AMP, first at the Circuit Court level and then at the Court of Appeals, and the constitutional defense that grounded the federal order has been eliminated at every level of state-court adjudication that has reached the merits. More than two and a half years after the Virginia Attorney General issued its CIDs in October 2023, AMP has not complied with substantial portions of those CIDs.¹²⁸ That federal order has never been dissolved, and no appellate court has reviewed it. The Attorney General noticed an appeal on October 31, 2025, but the Fourth Circuit withheld docketing pending the district court's disposition of the motions before it, and the appeal remains undocketed. The Attorney General's motion to dismiss, which argued that the federal court was required to abstain under *Younger v. Harris*, was argued on December 5, 2025 and taken under advisement without a ruling. The district court then moved the case into a settlement posture, closing it administratively on May 22, 2026 and directing the parties to file either a stipulation of dismissal or a joint status

¹²⁵ *Commonwealth of Virginia v. AJP Educational Foundation, Inc.*, Richmond City Circuit Court, Order (Sept. 29, 2025) (Davis, J.) (holding AMP in civil contempt and imposing \$1,000-per-day coercive fines for noncompliance with the CID); *AJP Educational Foundation, Inc. d/b/a American Muslims for Palestine v. Miyares*, No. 1:25-cv-01617 (E.D. Va.), Order Granting Emergency Motion for Temporary Restraining Order (Oct. 3, 2025), explained in Memorandum Opinion (Oct. 17, 2025) (Brinkema, J.) (enjoining enforcement of the Richmond Circuit Court contempt order on First Amendment associational-freedom grounds); reported in Charlotte Rene Woods, "Judge issues injunction against Miyares in probe of pro-Palestinian nonprofit," *Virginia Mercury*, Oct. 21, 2025, <https://virginiamercury.com/2025/10/21/judge-issues-injunction-against-miyares-in-probe-of-pro-palestinian-nonprofit/>; "Attorney General Miyares Secures Court Decision Requiring American Muslims for Palestine to Comply with Investigation," *Legal Newsline*, <https://legalnewsline.com/stories/671509470-attorney-general-miyares-secures-court-decision-requiring-american-muslims-for-palestine-to-comply-with-investigation>.

¹²⁶ *AJP Educ. Found. Inc. v. Miyares*, 25-CV-1617 (DE 44-1) (appending VA Court of Appeals decision finding AMP's constitutional arguments were not preserved for appeal).

¹²⁷ See *AJP Educational Foundation, Inc. v. Jones*, No. 260119 (Va.) (petition for appeal filed February 6, 2026; brief in opposition filed March 9, 2026; pending as of July 2026). The Attorney General is sued in his official capacity; Jason Miyares, who issued and litigated the civil investigative demand described above, left office in January 2026 and was succeeded by Attorney General Jay Jones, who is now the named appellee. Supreme Court of Virginia Appellate Case Management System, Record No. 260119.

¹²⁸ *AJP Educ. Found. Inc. v. Miyares*, 25-CV-1617 (DE 53) (status report and CID compliance chart, detailing CIDs that have not yet been complied with).

report on their settlement discussions. That deadline has been extended twice, most recently on July 22, 2026, and now runs to August 28, 2026. A state investigation twice sustained in Virginia’s courts has therefore been suspended by a federal order no appellate court has examined, and its resolution now rests with a different Attorney General than the one who issued the demands.¹²⁹

B. Litigation Tactics Permit Obfuscation of Finances

Terror financing is hard to trace. Terrorist networks rely on financing mechanisms outside the mainstream financial system: bulk cash, charitable fronts, informal banking channels. Those mechanisms resist the kind of paper-trail discovery that civil litigation and regulatory oversight depend on. AMP has used both the court system and the banking system to maintain that opacity for years. Based on publicly available filings, AMP has been rebranded¹³⁰ and spun off related organizations, such as Students for Justice in Palestine (“SJP”), National Students for Justice in Palestine (“NSJP”), and U.S. Council of Muslim Organizations (“USCMO”).¹³¹ Each move has had the effect of sustaining Hamas’s American support network while staying ahead of legal accountability. AMP’s dilatory litigation tactics in the Virginia AG’s investigation are the most recent illustration: noncompliance with valid law enforcement investigations permits AMP to obscure its finances. It is a tactic other MB-affiliated entities have used.

¹²⁹ *AJP Educational Foundation, Inc. v. Miyares*, No. 1:25-cv-01617 (E.D. Va.), Dkt. Nos. 19 (order granting emergency motion; staying the September 29, 2025 Richmond Circuit Court sanctions and enjoining CID enforcement as to First Amendment-protected material, Oct. 3, 2025), 25 (memorandum opinion, Oct. 17, 2025), 29 (motion to dismiss for lack of jurisdiction, Oct. 23, 2025), 37 (notice of appeal, Oct. 31, 2025), 39 (Fourth Circuit letter withholding docketing of the appeal, Nov. 4, 2025), 41 (reply brief attaching *Juidice v. Vail*, 430 U.S. 327, Nov. 12, 2025), 43 (minute entry taking the motion to dismiss under advisement, Dec. 5, 2025), 57 (order directing a stipulation of dismissal or a joint settlement status report, May 22, 2026), 58 (Fourth Circuit letter noting the appeal was never docketed, May 27, 2026), 61 (deadline extended to July 31, 2026, June 26, 2026), and 64 (deadline extended to August 28, 2026, July 22, 2026). The docket lists Miyares as terminated on January 30, 2026 and Attorney General Jay Jones as the defendant. Docket retrieved via LexisNexis CourtLink on July 30, 2026; the most recent entry is Dkt. No. 65, a July 23, 2026 letter to the Fourth Circuit.

¹³⁰ *Boim*, 9 F.4th at 555.

¹³¹ AJP is the parent organization of National Students for Justice in Palestine. See *Parizer et al. v. AJP Educational Foundation, Inc. a/k/a American Muslims for Palestine and National Students for Justice in Palestine*, No. 1:24-cv-00724-RDA-IDD (DE 1 at 2) (E.D. Va. filed May 1, 2024) (“In 2010, AMP expanded its operation to American college campuses when it founded Defendant National Students for Justice in Palestine (“NSJP”) to control hundreds of Students for Justice in Palestine (“SJP”) chapters across the country.”). AMP is a founding member of USCMO. https://uscmo.org/founding_members/.

CAIR has done the same. In Texas, CAIR sued the governor in response to its designation as a terrorist organization.¹³² The case proceeded to discovery in advance of litigating CAIR's motion for preliminary injunction.¹³³ Rather than comply with the judge's discovery order, CAIR has engaged in a monthslong "unfortunate, but unmistakable, pattern of outright disobedience," requiring the governor to file *four* separate motions to compel discovery, the latest of which remains unresolved.¹³⁴

In *Lori Saroya v. CAIR Foundation Inc.* (detailed below), the plaintiff, a former CAIR employee, alleged that the organization was receiving funding from foreign governments, among other misconduct, including sexual harassment.¹³⁵ The court ordered that CAIR disclose donor information because it related to the question of whether CAIR received funding from foreign governments.¹³⁶ CAIR challenged the discovery order but settled the case for an unknown sum of money before its donor records were ever revealed.¹³⁷

C. Muslim Brotherhood–Affiliated Entities Silence Critics Through Expensive and Frivolous Lawfare

CAIR has filed defamation suits or threatened them against bloggers, authors, and former employees who have called the organization Islamist or Brotherhood-aligned.¹³⁸ CAIR's litigation against Lori Saroya is one such example. Saroya was employed by CAIR for several years, first as Executive Director of the Minnesota chapter and later as a member of the national board. During her tenure she learned of significant misconduct: CAIR had received "massive amounts of funding from international donors, information about which was kept a strict secret (even from CAIR's Board); [and] that it had been dishonest and misleading with its donors,

¹³² See generally *Council on American Islamic Relations Texas Dallas Fort Worth and Council on American Islamic Relations Austin Texas v. Abbott and Paxton*, 25-CV-01878 (W.D. Tx) (2025).

¹³³ See, e.g., *Council on American Islamic Relations Texas Dallas Fort Worth and Council on American Islamic Relations Austin Texas v. Abbott and Paxton*, 25-CV-01878 (W.D. Tx) (DE 33) (2025).

¹³⁴ See, e.g., *Council on American Islamic Relations Texas Dallas Fort Worth and Council on American Islamic Relations Austin Texas v. Abbott and Paxton*, 25-CV-01878 (W.D. Tx) (DE 76 at 7) (2025).

¹³⁵ *Saroya v. CAIR Foundation, Inc.*, 24-cv-00110 (D. Minn.) (DE 1).

¹³⁶ *Saroya v. CAIR Foundation, Inc.*, 24-cv-00110 (D. Minn.), (DE 43 at 17, 22).

¹³⁷ Isabel Vincent, "Controversial Muslim Charity Accused of Links to Hamas Settles Lawsuit Rather Than Disclosing Sources of Funding," *New York Post*, March 1, 2025, [Controversial Muslim charity accused of links to Hamas settles lawsuit rather than disclosing sources of funding](https://nypost.com/2025/02/28/us-news/hamas-linked-organization-cair-inc-wont-reveal-where-their-funding-is-coming-from/). Available at <https://nypost.com/2025/02/28/us-news/hamas-linked-organization-cair-inc-wont-reveal-where-their-funding-is-coming-from/>.

¹³⁸ "The Muslim Brotherhood's Strategic Entryism Into the United States: A Systemic Analysis," *ISGAP*, 2025, pages 114-115, [The Muslim Brotherhood's Strategic Entryism Into the United States: A Systemic Analysis](https://isgap.org/wp-content/uploads/2025/11/MB-Project-Final-251117-01.pdf). Available at <https://isgap.org/wp-content/uploads/2025/11/MB-Project-Final-251117-01.pdf>.

whose contributions it had frequently misused for the purpose of silencing critics. . .”¹³⁹ When Saroya tried to resign, CAIR asked her to sign a separation agreement with confidentiality and non-disparagement provisions that would “surrender[] her right to speak.”¹⁴⁰

After leaving CAIR, Saroya posted on social media about her experience, including CAIR’s receipt of international funding through its Washington Trust Foundation.¹⁴¹ CAIR responded by trying to condition payment of her owed back-wages on a non-disparagement agreement that would have barred Saroya from making any statements that “characterize[d] CAIR in a negative light.”¹⁴²

Saroya refused. So CAIR sued her for defamation, tortious interference with business relationships, and misappropriation of confidential information.¹⁴³ The suit sought damages and injunctive relief that would have prevented Saroya from speaking about her experience at CAIR.¹⁴⁴ In discovery, Saroya sought CAIR’s donor lists, which would have proven the truth of her statements relating to CAIR’s foreign funding.¹⁴⁵ CAIR “fought tooth and nail to prevent this information from being disclosed. Clearly, CAIR had something to hide, given that it objected to producing many of these relevant documents outright, and slow-walked the production of other documents that it had previously indicated it would produce.”¹⁴⁶ CAIR then voluntarily dismissed its own lawsuit with prejudice after several unfavorable rulings, while discovery litigation remained pending.¹⁴⁷

CAIR followed up with a press release accusing Saroya of cyberstalking, which became the subject of new litigation Saroya brought against CAIR.¹⁴⁸ Saroya again

¹³⁹ *Saroya v. CAIR Foundation, Inc.*, Case No. 0:24-cv-00110-DWF-DTS (D. Minn. Jan. 16, 2024) (DE 1 at ¶ 25).

¹⁴⁰ *Saroya v. CAIR Foundation, Inc.*, Case No. 0:24-cv-00110-DWF-DTS (D. Minn. Jan. 16, 2024), (DE 1 at ¶¶ 32-35).

¹⁴¹ *Saroya v. CAIR Foundation, Inc.*, Case No. 0:24-cv-00110-DWF-DTS (D. Minn. Jan. 16, 2024) (DE 1 at ¶ 42).

¹⁴² *Saroya v. CAIR Foundation, Inc.*, Case No. 0:24-cv-00110-DWF-DTS (D. Minn. Jan. 16, 2024) (DE 1 at ¶ 49).

¹⁴³ *See CAIR Foundation, Inc., et al. v. Saroya*, Case No. 0:21-cv-01267-SRN-TNL (D. Minn.).

¹⁴⁴ *Saroya v. CAIR Foundation, Inc.*, Case No. 0:24-cv-00110-DWF-DTS (D. Minn. Jan. 16, 2024). (DE 1 at ¶ 52).

¹⁴⁵ *Saroya v. CAIR Foundation, Inc.*, Case No. 0:24-cv-00110-DWF-DTS (D. Minn. Jan. 16, 2024). (DE 1 at ¶ 57).

¹⁴⁶ *Saroya v. CAIR Foundation, Inc.*, Case No. 0:24-cv-00110-DWF-DTS (D. Minn. Jan. 16, 2024). (DE 1 at ¶ 58).

¹⁴⁷ *See CAIR Foundation, Inc., et al. v. Saroya*, Case No. 0:21-cv-01267-SRN-TNL (D. Minn.) (DE 88).

¹⁴⁸ *Saroya v. CAIR Foundation, Inc.*, Case No. 0:24-cv-00110-DWF-DTS (D. Minn. Jan. 16, 2024). (DE 1 at ¶¶ 68-77).

sought CAIR's donor records. CAIR refused. She filed a motion to compel.¹⁴⁹ The court ruled in favor of Saroya and ordered CAIR to produce the records.¹⁵⁰ CAIR filed Rule 72(a) objections to that order, twice, and then settled the case at a sealed February 3, 2025 settlement conference before the district judge ruled on those objections, and before CAIR was required to produce a single donor record.¹⁵¹

Saroya's case is not an outlier. CAIR has worked to silence its critics even when those critics are the Muslim Americans CAIR purports to protect. From 2006-2008, CAIR's Maryland/Virginia chapter employed Morris J. Days III as its "Resident Attorney" and "Civil Rights Manager."¹⁵² Days represented more than 100 CAIR clients in immigration, employment, and discrimination matters.¹⁵³ Five former clients, three of them Muslim, sued CAIR. They alleged that CAIR knew or should have known Days was not a licensed attorney, that CAIR failed to report him to state bars or law enforcement, and that CAIR required complaining clients to sign confidentiality agreements with \$25,000 liquidated-damages clauses to silence them.¹⁵⁴ The litigation ran more than nine years. Plaintiffs moved twice to compel discovery, and both times the court ordered CAIR to produce, including an August 2011 order directing CAIR to turn over non-redacted client lists. CAIR's own motion for Rule 37 sanctions against the plaintiffs was denied. The case ended in June 2019 with a dismissal with prejudice following a settlement referral, nine years and five months after it was filed.¹⁵⁵

¹⁴⁹ *Saroya v. CAIR Foundation, Inc.*, Case No. 0:24-cv-00110-DWF-DTS (D. Minn. Jan. 16, 2024). (DE 32).

¹⁵⁰ *Saroya v. CAIR Foundation, Inc.*, Case No. 0:24-cv-00110-DWF-DTS (D. Minn. Jan. 16, 2024). (DE 43).

¹⁵¹ *Saroya v. CAIR Foundation, Inc.*, Case No. 0:24-cv-00110-DWF-DTS (D. Minn. Jan. 16, 2024). (DE 47, 72) (CAIR's Rule 72(a) objections to Magistrate Judge's discovery order); (DE 85) (Minute Entry, Binding Settlement Reached, Feb. 3, 2025); ECF Nos. 88, 90 (Stipulation of Dismissal and Order of Dismissal, Mar. 14, 2025).

¹⁵² Press Release, Am. Freedom Law Ctr., *D.C. Circuit: CAIR Must Stand Trial for Massive Fraud* (June 21, 2016), <https://www.americanfreedomlawcenter.org/press-release/d-c-circuit-cair-must-stand-trial-for-massive-fraud/>.

¹⁵³ Ryan Abbott, "Islamic Group Called a Criminal Front," Jan. 8, 2010, *Courthouse News Service*, available at <https://courthousenews.com/islamic-group-called-a-criminal-front/>.

¹⁵⁴ *Lopez v. Council on American-Islamic Relations Action Network, Inc.*, 741 F. Supp. 2d 222 (D.D.C. 2010).

¹⁵⁵ *Saiyed v. Council on American-Islamic Relations Action Network, Inc.*, No. 1:10-cv-00022-PLF-AK (D.D.C.) (consolidated with *Lopez v. Council on American-Islamic Relations Action Network, Inc.*, No. 1:10-cv-00023-PLF), Dkt. Nos. 37 (motion to compel, June 6, 2011), 42 (memorandum order granting in part, denying in part, and deferring in part, July 13, 2011), 45 (memorandum order directing CAIR to produce non-redacted client lists, Aug. 8, 2011), 48 (motion to compel answers to interrogatories and production of documents, Sept. 27, 2011), 53 (CAIR motion for sanctions pursuant to Fed. R. Civ. P. 37, Nov. 28, 2011), 54 (memorandum order granting in part and denying in part, Dec. 2, 2011), 58 (order denying CAIR's sanctions motion, Feb. 16, 2012), 92-93 (order and opinion granting CAIR summary judgment, Jan. 29, 2015), 94 (notice of appeal, Feb. 12, 2015), 100

This strategy serves multiple purposes beyond specific case outcomes. The first is the chilling effect. As the First Amendment Encyclopedia explains, a threat of defamation can prevent people from expressing even constitutionally protected speech: “If a person fears that she can be sued for defamation. . .he or she may avoid uttering the expression.”¹⁵⁶ The second is resource depletion. Defending even frivolous lawsuits requires substantial resources, and defamation actions are known to impose significant costs and risks on defendants. Even unsuccessful suits can bankrupt critics and chill future speech.¹⁵⁷ As described above, CAIR weaponizes the First Amendment protection to shield itself from criticism, while also silencing its critics, in contravention of the critics’ First Amendment rights. This tactic is dishonest and hypocritical and has sharply reduced the ability of plaintiffs who have bravely stepped forth to expose CAIR’s wrongdoing from achieving justice and exposing the Muslim Brotherhood’s illicit tactics.

D. CAIR uses litigation and settlement tactics to infiltrate classrooms and insert anti-American curriculum.

As an initial matter, CAIR develops curriculum that it seeks to insert into American educational environments, fulfilling its co-founder Omar Ahmad’s promise to “infiltrate” American education, media outlets, and research institutions.¹⁵⁸ A recent investigation revealed that CAIR chapters in Philadelphia, Delaware, New Jersey, Oklahoma, Florida, and Illinois are actively promoting anti-American 9/11 materials, “suggesting a coordinated nationwide effort to influence how American students learn about terrorism and Islamic extremism.”¹⁵⁹

The investigation revealed that CAIR’s educational materials include guides that instruct teachers to avoid using terms like “Islamic jihadists” or “radical Islamic

(mandate of the U.S. Court of Appeals for the D.C. Circuit, No. 15-7019, Aug. 2, 2016), 146 (order referring case for settlement, Feb. 26, 2019), and 153–154 (joint motion to dismiss with prejudice and order granting same, June 5–6, 2019). Case filed Jan. 6, 2010; terminated June 6, 2019. Docket available at courtlistener.com/docket/4497840/saiyed-v-council-on-american-islamic-relations-action-network-inc/ (last visited Aug. 4, 2026).

¹⁵⁶ “The Muslim Brotherhood’s Strategic Entryism Into the United States: A Systemic Analysis,” ISGAP, footnote 282, 2025, [The Muslim Brotherhood’s Strategic Entryism Into the United States: A Systemic Analysis](https://isgap.org/wp-content/uploads/2025/11/MB-Project-Final-251117-01.pdf). Available at <https://isgap.org/wp-content/uploads/2025/11/MB-Project-Final-251117-01.pdf>.

¹⁵⁷ The Muslim Brotherhood’s Strategic Entryism Into the United States: A Systemic Analysis, ISGAP, *supra*.

¹⁵⁸ *United States v. Holy Land Foundation*, No. 04-cr-240-G (“HLF”), *Government Exhibits: Philly Meeting 1-16*, <https://extremism.gwu.edu/legal-documents>.

¹⁵⁹ CAIR Systematically Trying to Influence K-12 Education Across US, *Investigation Finds*, Jewish Onliner, September 10, 2025, <https://jewishonliner.org/p/cair-influence-philadelphia-911-education>.

terrorists” when discussing 9/11.¹⁶⁰ The same investigation showed that the dissemination of this curriculum appeared to be a national strategy, and that nearly identical materials made their way into classrooms around the country.¹⁶¹ CAIR also boasted about its partnership with Chicago Public Schools, one of the nation’s largest school districts.¹⁶²

In 2022, CAIR-New Jersey partnered with Teaching While Muslim and introduced a 9/11 educators’ guide to nearly 30 New Jersey school districts.¹⁶³ This co-branded curriculum reads:

“The catastrophic events of 9/11 had such a massive impact that it sparked the phrase a 'post 9/11 world.' **Directly influenced by US foreign policy**, the tragic events of 9/11 unleashed a domino effect of events that marked an aggressive shift in US domestic and foreign policy, sparking the War on Terror and an erosion of civil liberties of many Americans. Understanding the context of 9/11 and its ramifications is an essential part of understanding the world as we see it today.”¹⁶⁴

Other parts of the curriculum state:

- “Though 9/11 was not the first attack on the United States, it was a major event that marked an aggressive shift in how the US treated its citizens and other countries.”¹⁶⁵

¹⁶⁰ CAIR Systematically Trying to Influence K-12 Education Across US, Investigation Finds, Jewish Onliner, supra.

¹⁶¹ CAIR Systematically Trying to Influence K-12 Education Across US, Investigation Finds, Jewish Onliner, supra.

¹⁶² CAIR Systematically Trying to Influence K-12 Education Across US, Investigation Finds, Jewish Onliner, supra.

¹⁶³ Press Release, Council on Am.-Islamic Rels., *CAIR-NJ, TWM Introduces Educators' Guide for Classroom Discussions of 9/11* (Sept. 8, 2022), https://www.cair.com/press_releases/cairnj-twm-introduces-educators-guide-for-classroom-discussions-of-9-11/.

¹⁶⁴ Council on American-Islamic Relations–New Jersey & Teaching While Muslim, *Muslim Studies Curriculum: The Impact of 9/11 on Muslims*, 2021, https://static1.squarespace.com/static/59f61895010027fd16153cec/t/612fb7fb363d9c67e6b25c72/1630517243495/Impact_Of911OnMuslims.pdf. (emphasis added).

¹⁶⁵ Council on American-Islamic Relations–New Jersey & Teaching While Muslim, *Muslim Studies Curriculum: The Impact of 9/11 on Muslims*, 2021, https://static1.squarespace.com/static/59f61895010027fd16153cec/t/612fb7fb363d9c67e6b25c72/1630517243495/Impact_Of911OnMuslims.pdf.

- “[Al Qaeda] launched the [9/11] attacks *in response to* America’s support of Israel, their involvement in the Persian Gulf War, and the vast presence of the US military in the Middle East.”¹⁶⁶

This curriculum was linked in CAIR-NJ’s 2025-2026 Back to School Guide.¹⁶⁷ Taken together, this curriculum is deeply problematic because it reframes 9/11 not as an unprovoked act of mass terrorism against innocent Americans, but as a predictable consequence of U.S. foreign policy, effectively shifting moral responsibility away from the Al-Qaeda terrorists who planned and executed the attacks and onto the United States itself. By sanitizing the ideology behind the attacks, discouraging accurate terminology like “radical Islamic terrorism,” and casting America as the aggressor whose policies “unleashed” the tragedy, CAIR engages in the ideological indoctrination its co-founder promised.

Aside from the curriculum it produces and promotes, CAIR engages in affirmative litigation against educational institutions to increase its ability to influence universities, their policies, and curricula. This recent campaign is about pursuing institutional concession.

For example, in October 2025, CAIR-Chicago filed a federal class action seeking nearly \$10 million in damages and an injunction against Northwestern’s mandatory antisemitism prevention training. The complaint alleged two violations of federal civil-rights law and Illinois speech law: Northwestern’s adoption of the International Holocaust Remembrance Alliance (IHRA) definition of antisemitism, and its rule that students complete the training to register for classes.¹⁶⁸ The district court denied plaintiffs’ temporary restraining order at a hearing in October.¹⁶⁹ Plaintiffs voluntarily dismissed the case in December 2025 without prejudice,

¹⁶⁶ CAIR–New Jersey and Teaching While Muslim, Muslim Studies Curriculum: The Impact of 9/11 on Muslims, *supra*.

¹⁶⁷ CAIR-New Jersey, 2025–2026 Back to School Guide (2025), <https://cair-nj.org/wp-content/uploads/2025/09/2025-26-BACK-TO-SCHOOL-GUIDE-2.pdf> (last visited July 30, 2026).

¹⁶⁸ Complaint, *Tahboub v. Northwestern Univ.*, No. 1:25-cv-12614 (N.D. Ill. filed October 15, 2025), ECF No. 1 (Alexakis, J.). CAIR-Chicago publicized and coordinated the case. *Students Sue Northwestern Over Coercive Antisemitism Training*, CAIR-Chicago, October 15, 2025, <https://www.cairchicago.org/blog/breaking-news-students-sue-northwestern-over-coercive-antisemitism-training>; Danielle Cohen-Kanik, *CAIR Files Title VI Lawsuit Against Northwestern Over Antisemitism Training Video*, *Jewish Insider*, October 20, 2025, <https://jewishinsider.com/2025/10/cair-northwestern-university-title-vi-lawsuit-antisemitism-training-video/>. Civil Rights Litigation Clearinghouse, Case No. 47451, <https://clearinghouse.net/case/47451/>.

¹⁶⁹ *Tahboub v. Northwestern Univ.*, No. 1:25-cv-12614 (N.D. Ill.) (ECF No. 29).

preserving their ability to refile.¹⁷⁰ The objective of the litigation, regardless of outcome, was to use Title VI as the procedural vehicle to override a university's choice about what mandatory training covers and how it is delivered.

The Pomona College matter is another illustration. CAIR was not a party here. In April 2024, the Louis D. Brandeis Center for Human Rights Under Law and the Anti-Defamation League filed a Title VI antisemitism complaint against Pomona. In December 2025, Pomona executed a Voluntary Resolution Agreement that mandates annual Title VI training for all students, faculty, and staff and creates a Civil Rights and Title VI Coordinator position.¹⁷¹ Seven days after the agreement was executed, CAIR-California wrote to the college's president demanding that Pomona include Islamophobia, anti-Muslim bias, and anti-Palestinian discrimination in the mandated training and “engage [CAIR] as a partner in the development and delivery of these trainings.”¹⁷² Pomona has not publicly responded to that demand. The college's public materials describing the resolution agreement make no reference to CAIR, no announcement has been made of a CAIR role in the mandated training, and the resolution agreement has not been modified to incorporate the changes CAIR sought.¹⁷³ But the letter serves as a template. When other parties secure Title VI resolution agreements that touch on shared-ancestry discrimination, CAIR moves to convert the resulting compliance work into a partner role inside the institution.

¹⁷⁰ Minute Entry Denying Motion for Temporary Restraining Order, ECF No. 21 (N.D. Ill. Oct. 20, 2025); Plaintiffs' Notice of Voluntary Dismissal (Joint), ECF No. 29 (Dec. 22, 2025); Minute Entry Dismissing Case Without Prejudice Under Fed. R. Civ. P. 41(a)(1)(A)(ii), ECF No. 30 (Dec. 23, 2025). Full procedural history at Civil Rights Litigation Clearinghouse, Case No. 47451, <https://clearinghouse.net/case/47451/>.

¹⁷¹ Pomona College, *Resolution Agreement* (Dec. 10, 2025), <https://www.pomona.edu/resolution-agreement>; full agreement at <https://brandeiscenter.com/wp-content/uploads/2025/12/Pomona-Settlement-12-10-2025.pdf>. The underlying Title VI complaint was filed in April 2024 by the Louis D. Brandeis Center for Human Rights Under Law and the Anti-Defamation League. CAIR was not a party.

¹⁷² Letter from Hussam Ayloush, Executive Director, CAIR-California, to G. Gabrielle Starr, President, Pomona College, December 17, 2025, <https://ca.cair.com/wp-content/uploads/2025/12/2025.12.17-LTR-from-CAIR-to-Pomona-redacted.pdf>; CAIR & CAIR-LA, *CAIR, CAIR-LA Raise Concerns Regarding Pomona College's 'Harmful' Settlement Agreement with Pro-Israel Groups*, December 17, 2025, <https://ca.cair.com/press-release/cair-cair-la-raise-concerns-regarding-pomona-colleges-harmful-settlement-agreement-with-pro-israel-groups-calls-on-administration-to-protect-academic-freedom/>.

¹⁷³ Pomona College, *Resolution Agreement: Questions and Answers*, (page maintained by Pomona; accessed on May 16, 2026), <https://www.pomona.edu/resolution-agreement>. The page describes the resolution agreement's mandated training program and the Civil Rights and Title VI Coordinator position. No reference is made to CAIR or to CAIR-LA's December 17, 2025 letter. The author has located no public statement by Pomona accepting CAIR's request or modifying the resolution agreement to incorporate any of the changes CAIR sought.

The Committee should treat CAIR's civil rights filings against educational institutions as part of the record this testimony has built under *Boim* and *Saroya*: the same litigation tactic, carried into a different forum.

They told us who they are, and we did not believe them. CAIR's cofounder promised to infiltrate American media outlets, research institutions, and universities. CAIR seeks to increase its influence in universities, to insert its curriculum in K-12 schools, and to fundamentally change the way Americans think about terrorism itself, recasting political violence as resistance, criticism of that violence as bigotry, and the institutions designed to expose both as instruments of oppression.

V. Existing Statutory Authority and the Enforcement Gaps Congress Should Close

Unraveling the Muslim Brotherhood's deep web requires both the political will to enforce already-existing laws, as well as closing key enforcement gaps that permit the network to metastasize.

Start with federal funding. The FBI suspended all formal liaison with CAIR in 2009, after evidence introduced at the *Holy Land Foundation* trial linked CAIR, its founders, and the Muslim Brotherhood's Palestine Committee to Hamas.¹⁷⁴ Yet CAIR

¹⁷⁴ Letter from Assistant Director Richard C. Powers, Office of Congressional Affairs, Federal Bureau of Investigation, to Senator Jon Kyl, April 28, 2009 ("[U]ntil we can resolve whether there continues to be a connection between CAIR or its executives and HAMAS, the FBI does not view CAIR as an appropriate liaison partner."), published in 155 Cong. Rec. H6669–H6675 (June 12, 2009), <https://www.congress.gov/crec/2009/06/12/CREC-2009-06-12-pt1-PgH6669-6.pdf> (Congressional Record entry submitting the FBI letter and documenting the Bureau's suspension of formal contacts with CAIR following evidence introduced at the *Holy Land Foundation* trial linking CAIR, its founders, and the Muslim Brotherhood's Palestine Committee to Hamas); full text of the FBI letter reproduced in *RealClearInvestigations*, "Full FBI Letter in 2009 on Suspending Contacts With CAIR," November 8, 2023, https://www.realclearinvestigations.com/articles/2023/11/08/full_fbi_letter_in_2009_on_suspending_contacts_with_cair_991309.html.

and CAIR-affiliated entities have continued to receive federal grant funds.¹⁷⁵ No federal grant money should flow to any MB-affiliated entity, starting with CAIR.

The stakes are not hypothetical. In 2026 the Department of Health and Human Services opened a review of CAIR-California after an HHS official identified more than \$27 million in HHS-originated funds that California had sub-granted to it, a review that could end in debarment from federal funding.¹⁷⁶ The Chairman of the House Ways and Means Committee separately referred CAIR-California to the IRS, noting that it “assisted less than 10 percent of the proposed Afghan refugees” while sub-granting half the money to an unregistered entity operating under its own Employer Identification Number.¹⁷⁷

Federal accreditation is the next problem. The Department of Justice’s Executive Office for Immigration Review provided accreditation to CAIR on March 24, 2015.¹⁷⁸ Under that accreditation, CAIR-California and its attorneys are

¹⁷⁵ On the federal-grant funding flowing to CAIR and CAIR-affiliated entities despite the FBI’s formal cessation, see Sam Westrop, “DHS Approves \$100k Grant of Taxpayers’ Money to CAIR,” Middle East Forum, <https://www.meforum.org/dhs-approves-100k-grant-to-cair> (documenting October 2025 DHS Nonprofit Security Grant Program funds flowing to CAIR through a District of Columbia sub-recipient award); Sam Westrop, “DHS Approves \$100k Grant of Taxpayers’ Money to CAIR,” Islamist Watch, <https://www.meforum.org/islamist-watch/60298/dhs-approves-100k-grant-of-taxpayers-money-to-cair>; H.R. 4097, 119th Congress, 2025, (proposed legislation citing CAIR’s unindicted co-conspirator status in the *Holy Land Foundation* case and addressing federal-government engagement with CAIR), <https://www.congress.gov/119/bills/hr4097/BILLS-119hr4097ih.htm>. See also Biden’s Afghan Parolee Program—A Trojan Horse with Flawed Vetting and Deadly Consequences: Hearing Before the Subcomm. on Crime & Counterterrorism and the Subcomm. on Border Sec. & Immigration of the S. Comm. on the Judiciary, 119th Congress, 2026 (written testimony of Julie Marzouk, Esq.) (detailing federal grant moneys provided to CAIR via the State of California), https://www.judiciary.senate.gov/imo/media/doc/feef0474-ff5a-c9f7-7af8-b1dfd901a825/2026-01-14_Testimony_Marzouk.pdf.

¹⁷⁶ Gustav Chiarello, HHS Assistant Secretary, letter to Gov. Gavin Newsom, June 9, 2026 (citing “\$27 million in HHS-originated” funds sub-granted to CAIR-California); the review followed an April 27, 2026 request by Rep. Chip Roy and thirteen House Republicans. See Middle East Forum, “HHS Launches Investigation into CAIR for Grant Abuses and Terror Links,” June 11, 2026, [meforum.org](https://www.meforum.org). The underlying request is public: Letter from Rep. Chip Roy et al. to HHS Secretary Robert F. Kennedy, Jr. (Apr. 27, 2026), roy.house.gov. Available at <https://www.meforum.org/press-releases/hhs-launches-investigation-into-cair-for-grant-abuses-and-terror-links-following-mef-campaign>; https://roy.house.gov/sites/evo-subsites/roy-evo.house.gov/files/evo-media-document/cair-debarment_hhs-letter.pdf.

¹⁷⁷ Letter from Ways and Means Chairman Jason Smith to the IRS, Jan. 13, 2026 (CAIR-California “assisted less than 10 percent of the proposed Afghan refugees and instead sub-granted half of the money to CAIR-Los Angeles—an unregistered entity operating under CAIR-California’s Employer Identification Number”), waysandmeans.house.gov. Available at <https://waysandmeans.house.gov/wp-content/uploads/2026/01/1.13.2026-Chairman-Smith-Letter-to-IRS.pdf>.

¹⁷⁸ U.S. Department of Justice, Executive Office for Immigration Review, Office of Legal Access Programs, Recognized Organizations and Accredited Representatives Roster (listing Council on

permitted to provide legal services through non-attorney representatives to practice before EOIR and the Department of Homeland Security (DHS).¹⁷⁹ In light of CAIR's illicit activities and demonstrated ties to terrorist organizations, its accreditation must not be renewed.

The Executive Branch can initiate investigations into MB-affiliated entities for their conduct that appears violative of already existing regulations. The U.S. Treasury Department's Office of Foreign Assets Control ("OFAC") can apply the Global Terrorism Sanctions Regulations ("GTSR") framework to hold MB-affiliated entities accountable for their provision of services to FTOs and SDGTs. The Internal Revenue Service ("IRS") can similarly apply its enforcement tools to nonprofits operating outside their exempt purpose. The federal material support statutes, specifically 18 U.S.C. § 2339B, can sustain criminal investigations into MB-affiliated entities that provide material support to designated entities, when reasonable cause exists.

A. Applicability of the GTSR Framework to CAIR's Provision of Services to Hamas

Several of the examples above provide bases for the U.S. Treasury Department to investigate CAIR's provision of services to designated SDGTs and FTOs. Section

American-Islamic Relations as a recognized organization with an original recognition date of March 24, 2015), roster reports available at <https://www.justice.gov/eoir/recognition-accreditation-roster-reports>, with the current roster PDF at <https://www.justice.gov/eoir/media/1398081/dl?inline=>; see also U.S. Department of Justice, Executive Office for Immigration Review, "Recognition & Accreditation (R&A) Program," <https://www.justice.gov/eoir/recognition-and-accreditation-program> (describing the EOIR program through which non-attorney representatives of recognized nonprofit organizations are authorized to represent individuals before DHS and EOIR in immigration proceedings); on the policy implications of CAIR's continued EOIR accreditation, see Sam Westrop, "Trump's DOJ should stop treating CAIR as a legitimate immigration provider," *The Hill*, May 2025, <https://thehill.com/opinion/immigration/5349087-3-cair-california-funding-accusations-controversy/>; Press Release, Office of Rep. Chip Roy, "Roy leads congressional delegation calling to halt federal funding for CAIR," https://www.thedigitalcourier.com/news/national/roy-leads-congressional-delegation-calling-to-halt-federal-funding-for-cair/article_f54c230e-64fc-5348-9a71-7ff97072168f.html.

¹⁷⁹ U.S. Department of Justice, Executive Office for Immigration Review, "Recognition & Accreditation (R&A) Program," <https://www.justice.gov/eoir/recognition-and-accreditation-program> (describing the EOIR program under which "[a]ccredited representatives of recognized organizations are authorized to represent individuals before [the Department of Homeland Security ('DHS')], the Immigration Courts, and/or the Board of Immigration Appeals [under EOIR]"); see also U.S. Department of Justice, Executive Office for Immigration Review, "Recognition & Accreditation Program — Frequently Asked Questions," <https://www.justice.gov/eoir/recognition-and-accreditation-program-frequently-asked-questions>; 8 C.F.R. § 1292.11 *et seq.* (federal regulations governing recognition of organizations and accreditation of non-attorney representatives); on CAIR-California's specific participation, see Sam Westrop, "Trump's DOJ should stop treating CAIR as a legitimate immigration provider," *The Hill*, May 2025, <https://thehill.com/opinion/immigration/5349087-3-cair-california-funding-accusations-controversy/> (documenting CAIR-CA's reliance on EOIR R&A accreditation to operate its immigration legal services through non-attorney representatives).

594.204 of GTSR prohibits any U.S. person from engaging in transactions or dealings that benefit persons whose property is blocked under § 594.201(a), including providing contributions of funds, goods, or services “for the benefit of” such designated persons. Although Al-Zaytouna itself is not a designated entity, the information described above shows that it operates for the benefit of Hamas (a blocked person), matching the Treasury-identified pattern of organizations that obscure their SDGT links behind a legitimate facade. Services provided to or through Al-Zaytouna should therefore qualify as services “for the benefit of” Hamas under § 594.204.

Under the GTSR framework, propaganda services, consultation services, and institutional credibility can all qualify as the provision of services “for the benefit of” Hamas or other terrorist organizations under § 594.204. CAIR-Ohio Executive Director Khalid Turaani’s participation in the October 2025 Al-Zaytouna event provided exactly that. His appearance gave publicity and promotional value to the panel by associating “America’s largest Muslim civil liberties organization”¹⁸⁰ with a Hamas-aligned institution and a designated SDGT.

This framework can similarly be applied to CAIR’s affiliation with and cross-promotion with IUMS. *See* Section III.B *supra*.

Aside from the GTSR framework, the IRS is empowered to enforce the requirements of the tax code as they apply to nonprofit organizations affiliated with the MB.

B. Applicability of the IRC to MB-Affiliated Nonprofit Organizations

Section 501(c)(3) of the IRC requires that an organization be organized and operated *exclusively* for one or more tax-exempt purposes. Treasury regulations clarify that “exclusively” means “primarily,” but that an organization is not operated exclusively for exempt purposes if more than an insubstantial part of its activities is not in furtherance of an exempt purpose.¹⁸¹ The Washington Trust Foundation, described above, exists “to support the charitable purpose of CAIR-Foundation

¹⁸⁰ CAIR, “About Us,” https://www.cair.com/about_cair/about-us/ (CAIR’s self-description as “America’s largest Muslim civil liberties organization, with regional offices nationwide” and “a grassroots civil rights and advocacy group”); *see also* CAIR, “CAIR at a Glance,” https://www.cair.com/about_cair/cair-at-a-glance/.

¹⁸¹ 26 C.F.R. § 1.501(c)(3)-1(c)(1) (“An organization will be regarded as ‘operated exclusively’ for one or more exempt purposes only if it engages primarily in activities which accomplish one or more of such exempt purposes specified in section 501(c)(3). An organization will not be so regarded if more than an insubstantial part of its activities is not in furtherance of an exempt purpose.”), available at [https://www.ecfr.gov/current/title-26/chapter-I/subchapter-A/part-1/subject-group-ECFR062882ac6495890/section-1.501\(c\)\(3\)-1](https://www.ecfr.gov/current/title-26/chapter-I/subchapter-A/part-1/subject-group-ECFR062882ac6495890/section-1.501(c)(3)-1).

Inc.”¹⁸² and its 2024 return reports total assets of \$21,162,467 against \$14,926,176 in liabilities.¹⁸³

It reports no employees, no programs, and no grants to any outside organization in any year, and its largest single asset is a \$17,388,028 construction project the return labels “CONST PROJECT 2ANDK CAIR.”¹⁸⁴

WTF’s entire operation, as reflected in its public filings, consists of holding real estate and collecting rent. The stated educational and civil-rights-networking mission has no discernible relationship to passive ownership and leveraged development of a commercial building. An organization that functions as a real estate holding and development vehicle, with no employees, no grants, no educational programming, and no discernible charitable activity, should not enjoy 501(c)(3) status.

¹⁸² Washington Trust Foundation Inc., IRS Form 990 for tax year 2024 (EIN 52-1887951), filed Nov. 11, 2025, Schedule O, Part III line 2, projects.propublica.org/nonprofits/full_text/202513159349304086/IRS990ScheduleO (stating the “ORGANIZATION MISSION TO SUPPORT THE CHARITABLE PURPOSE OF CAIR-FOUNDATION INC (CAIR FOUNDATION)”); *see also* projects.propublica.org/nonprofits/organizations/521887951/202513159349304086/full (full filing, last visited Aug. 3, 2026).

¹⁸³ Washington Trust Foundation Inc., IRS Form 990 for tax year 2024 (EIN 52-1887951), filed Nov. 11, 2025, Part X (Balance Sheet), reporting total assets of \$21,162,467, total liabilities of \$14,926,176, and net assets of \$6,236,291; Schedule D, Part IX, reporting “CONST PROJECT 2ANDK CAIR” at \$17,388,028. projects.propublica.org/nonprofits/organizations/521887951/202513159349304086/full and projects.propublica.org/nonprofits/full_text/202513159349304086/IRS990ScheduleD (last visited Aug. 4, 2026). [Washington Trust Foundation Inc., IRS Form 990 for tax year 2024 \(EIN 52-1887951\), filed Nov. 11, 2025, Part X \(Balance Sheet\), reporting total assets of \\$21,162,467, total liabilities of \\$14,926,176, and net assets of \\$6,236,291; Schedule D, Part IX, reporting “CONST PROJECT 2ANDK CAIR” at \\$17,388,028.](https://projects.propublica.org/nonprofits/organizations/521887951/202513159349304086/full) projects.propublica.org/nonprofits/organizations/521887951/202513159349304086/full and projects.propublica.org/nonprofits/full_text/202513159349304086/IRS990ScheduleD (last visited Aug. 4, 2026). [Washington Trust Foundation Inc., IRS Form 990 for tax year 2024 \(EIN 52-1887951\), filed Nov. 11, 2025, Part X \(Balance Sheet\), reporting total assets of \\$21,162,467, total liabilities of \\$14,926,176, and net assets of \\$6,236,291; Schedule D, Part IX, reporting “CONST PROJECT 2ANDK CAIR” at \\$17,388,028.](https://projects.propublica.org/nonprofits/organizations/521887951/202513159349304086/full) projects.propublica.org/nonprofits/organizations/521887951/202513159349304086/full and projects.propublica.org/nonprofits/full_text/202513159349304086/IRS990ScheduleD (last visited Aug. 4, 2026).

¹⁸⁴ Washington Trust Foundation, Inc., IRS Form 990 (EIN 52-1887951), Fiscal Year Ending December 31, 2022, available via ProPublica Nonprofit Explorer at <https://projects.propublica.org/nonprofits/organizations/521887951/202333129349304483/full>; Washington Trust Foundation, Inc., IRS Form 990 (EIN 52-1887951), Fiscal Year Ending December 31, 2023, available via ProPublica Nonprofit Explorer at <https://projects.propublica.org/nonprofits/organizations/521887951/202413199349304646/full>; Washington Trust Foundation, Inc., IRS Form 990 (EIN 52-1887951), Fiscal Year Ending December 31, 2024, available via ProPublica Nonprofit Explorer at <https://projects.propublica.org/nonprofits/organizations/521887951/202513159349304086/full>.

Courts and the Internal Revenue Service have long recognized that nonprofit organizations must not have an illegal purpose.¹⁸⁵ Loss of government revenues from tax exemption is often justified on the grounds that tax-exempt organizations serve desirable public purposes and lessen the government's costs and burdens.¹⁸⁶ Relatedly, tax exemption is not justified when an organization serves an illegal purpose because it impliedly fails to provide a public benefit and, in fact, increases the government's costs and burdens. The illegality doctrine aims to ensure that the government is not subsidizing illegal activity. For example, in *Church of Scientology v. Commissioner*, 83 T.C. 381, 504 (1984), the Tax Court held that a church that conspired to impede an IRS investigation did not qualify as a 501(c)(3) for certain years. The court concluded that the church engaged in a conspiracy to defraud the United States, which demonstrated that the church had a “substantial illegal purpose.”

Treasury Regulation Section 1.501(c)(3)-1(d)(2) explains that an organization shall not qualify as a nonprofit if “more than an insubstantial part of its activities” further a nonexempt purpose. CAIR and AMP were created by Hamas operatives embedded in a U.S.-based Hamas support network and have maintained connections to terrorists and terrorist organizations throughout their existence. As described above, CAIR leaders and affiliates have continued to make statements that demonstrate its ongoing involvement in and commitment to the terrorist network by repackaging terror narratives and defending terrorist organizations and their objectives, showing that CAIR has never repudiated its founding agenda. CAIR and AMP's enjoyment of tax-exempt status is incompatible with the purpose of section 501(c)(3). For example, CAIR's Executive Director Nihad Awad told an American Muslims for Palestine convention that he was “happy to see” Gazans “break the siege” on October 7th.¹⁸⁷

C. Material Support Statutory Framework

The Department of Justice may initiate an investigation into MB-affiliated entities for material support to a terrorist organization pursuant to 18 U.S.C. §

¹⁸⁵ *Bob Jones University v. United States*, 461 U.S. 574 (1983).

¹⁸⁶ Cong. Rsch. Serv., IF12739, *The Illegality Doctrine and 501(c)(3) Organizations*, August 14, 2024, <https://www.congress.gov/crs-product/IF12739>.

¹⁸⁷ MEMRI TV, “CAIR Executive Director Nihad Awad at American Muslims for Palestine (AMP) Convention: I Was Happy to See the People of Gaza Break the Siege on October 7,” Clip No. 10705, November 24, 2023, [memri.org](https://www.memri.org); see also “CAIR Executive Director ‘Happy to See’ Oct. 7 Hamas Terror Attack,” *Jewish Insider*, December 2023. Available at <https://www.memri.org/tv/cair-exec-director-nihad-awad-amp-happy-gaza-october-seven-victorious-israel>; <https://jewishinsider.com/2023/12/nihad-awad-council-american-islamic-relations-israel-gaza-terror-attacks/>.

2339B, which criminalizes both providing material support and concealing “the nature, location, source, or ownership” of such support.

The Justice Department may also initiate an investigation into CAIR pursuant to 18 U.S.C. § 1343 for wire fraud, based on the theory that CAIR represents to its donors that it does not receive foreign funding, a representation the public record contradicts. Other Title 18 provisions that may also reach the conduct documented in this testimony include conspiracy, under 18 U.S.C. § 371; or racketeering offenses, 18 U.S.C. § 1961 *et seq.*

A further avenue lies outside Title 18. To the extent CAIR or its affiliates act in the United States at the direction of, or with funding from, a foreign principal, their failure to register may implicate the Foreign Agents Registration Act, 22 U.S.C. § 611 *et seq.* Yet another lies in the civil False Claims Act, 31 U.S.C. § 3729: to the extent CAIR-California drew federal refugee-resettlement funds while sub-granting them to an unregistered affiliate and delivering a fraction of the services it promised, it may face treble-damages liability for false certifications.¹⁸⁸

VI. Enforcement Gaps Must Be Addressed

Enforcing the existing statutory authority will lead to meaningful consequences. Addressing two enforcement gaps would facilitate the investigation and dismantling of domestic Muslim Brotherhood networks.

The first is the successor organization loophole. As described above, American Muslims for Palestine and its affiliates (including NSJP) emerged from the same series of entities that were found liable for material support to Hamas. The Boim family has spent more than twenty years pursuing justice for the murder of their son David, and the successor-organization loophole has let the same bad actors with the same objectives reconstitute into new organizations without consequence. Victims of terror are forced to play a game of whack-a-mole against organizations whose underlying liability has already been adjudicated. Congress should close the successor-organization loophole and limit the ability of nonprofit officers and directors to create and lead new nonprofits when their prior nonprofits were shut down for terrorism-related conduct. A workable framework already exists. The Immigration and Nationality Act provides for alias designation against entities that act as successor organizations to designated FTOs. *See* 8 U.S.C. § 1189(b)(1). Congress should apply that premise to alias nonprofits.

¹⁸⁸ *See* Section V *supra* (HHS review of CAIR-California; the Ways and Means referral documenting the sub-grant to an unregistered affiliate operating under CAIR-California’s Employer Identification Number).

The second gap is foreign funding disclosure. Congress should pass legislation requiring nonprofits to disclose the total amount and origin of foreign donations received on a separate, dedicated schedule as part of their annual IRS filings. This schedule should be made available to the public to ensure transparency and allow meaningful scrutiny of whether a 501(c)(3) is acting on behalf of foreign interests. Entities that fail to properly disclose foreign funding should have their nonprofit status immediately revoked or suspended pending IRS investigation. CAIR illustrates the gap: it has repeatedly settled litigation rather than produce its donor records,¹⁸⁹ even as foreign, government-owned financing of its headquarters remained absent from its public filings.

Enforcing our laws and implementing these new solutions can stem the tide of the Muslim Brotherhood's expanding influence. Western allies have repeatedly warned about the dangers posed by the MB if left unchecked, and both the American public and elected officials would be wise to heed the warnings of our allies, who have seen the impacts of MB infiltration on the fabric of their societies.

VII. Western Allies Are Warning About Muslim Brotherhood Infiltration, and the United States Must Listen

The United States is not the first country to identify this problem. Multiple allied democracies have reached the same conclusions independently, after their own intelligence and security reviews.

In May 2025, the French Interior Ministry issued a report addressing the threat the Muslim Brotherhood poses to its society.¹⁹⁰ The report claims that the Brotherhood is waging a covert war via local proxies to subvert France's secular values and institutions,¹⁹¹ in line with the Brotherhood's stated purpose of creating a global caliphate. The report urged decisive action to halt what it described as the gradual spread of "political Islam," warning that it poses a serious threat to social cohesion. It detailed how the Islamist campaign targeted schools, mosques, and local nongovernmental organizations to influence rulemaking at both the local and

¹⁸⁹ See Section IV *supra* (CAIR's pattern of settling litigation to avoid producing its donor records).

¹⁹⁰ Juliette Jabkhiro, "Government-commissioned Report Says Muslim Brotherhood Posing Threat to French Unity," Reuters, May 21, 2025, [Government-commissioned report says Muslim Brotherhood posing threat to French unity | Reuters](https://www.reuters.com/world/government-commissioned-report-says-muslim-brotherhood-posing-threat-french-2025-05-21/). Available at <https://www.reuters.com/world/government-commissioned-report-says-muslim-brotherhood-posing-threat-french-2025-05-21/>.

¹⁹¹ Juliette Jabkhiro, "Government-commissioned Report Says Muslim Brotherhood Posing Threat to French Unity," Reuters, May 21, 2025, [Government-commissioned report says Muslim Brotherhood posing threat to French unity | Reuters](https://www.reuters.com/world/government-commissioned-report-says-muslim-brotherhood-posing-threat-french-2025-05-21/). Available at <https://www.reuters.com/world/government-commissioned-report-says-muslim-brotherhood-posing-threat-french-2025-05-21/>.

national levels, particularly on issues of secularism and gender equality. Interior Minister Bruno Retailleau confirmed the report's conclusion that the Muslim Brotherhood ultimately seeks to "shift all of French society to sharia [law]."¹⁹² On July 7, 2025, French President Emmanuel Macron announced an expansion of financial and administrative sanctions against Muslim Brotherhood-affiliated groups operating in France; the French Senate adopted implementing legislation on May 5, 2026 by a vote of 208 to 124, and the bill awaits action in the National Assembly.¹⁹³

The United Kingdom reached a similar conclusion. In 2014, Prime Minister David Cameron commissioned an official review of the Brotherhood's activities in the UK. The review identified the Muslim Association of Britain (MAB), a Muslim civil rights group analogous to CAIR or AMP, as "dominated by the Muslim Brotherhood."¹⁹⁴ MAB has positioned itself as nationally representative of British Muslims and as the community's interlocutor with the state.¹⁹⁵ That is the same strategy the Brotherhood employs across the Western world: establish a nationally representative organization, claim to speak for an entire religious community, and use that institutional voice to seek media visibility and engagement with local and national authorities.¹⁹⁶ *On January 9, 2026, the United Arab Emirates announced that it would withdraw funding for Emirati citizens studying in the United Kingdom, on grounds that British campuses had become Muslim Brotherhood recruitment grounds.*¹⁹⁷

¹⁹² Jabkhiro, Government-commissioned Report Says Muslim Brotherhood Posing Threat to French Unity, Reuters, *supra*.

¹⁹³ "France announces new financial, administrative sanctions against Muslim Brotherhood 'entryism,'" Anadolu Agency, July 7, 2025, <https://www.aa.com.tr/en/europe/france-announces-new-financial-administrative-sanctions-against-muslim-brotherhood-entryism/3624890>; Implementing legislation has since advanced through the French Parliament: the French Senate voted 208–124 on May 5, 2026 to approve a bill introduced by former Interior Minister Bruno Retailleau implementing the Macron-announced measures, "French Senate Passes Sweeping Measures Against Islamist Infiltration," Middle East Forum, <https://www.meforum.org/fwi/fwi-news/french-senate-passes-sweeping-measures-against-islamist-infiltration>; the bill awaits action in the National Assembly as of the date of this testimony.

¹⁹⁴ "The Muslim Brotherhood in Britain: Analysis of Recent Sanctions," Counter Extremism Project, [The Muslim Brotherhood in Britain: Analysis of Recent Sanctions | Counter Extremism Project](https://www.counterextremism.com/blog/muslim-brotherhood-britain-analysis-recent-sanctions). Available at <https://www.counterextremism.com/blog/muslim-brotherhood-britain-analysis-recent-sanctions>.

¹⁹⁵ The Muslim Brotherhood in Britain: Analysis of Recent Sanctions, Counter Extremism Project, *supra*.

¹⁹⁶ The Muslim Brotherhood in Britain: Analysis of Recent Sanctions, Counter Extremism Project, *supra*.

¹⁹⁷ Rimjhim Singh, "UAE Restricts Funding for UK Studies Amid Concerns Over Muslim Brotherhood," Business Standard, January 9, 2026, accessed April 29, 2026, [UAE restricts funding for UK studies amid concerns over Muslim Brotherhood | World News - Business Standard](https://www.business-standard.com/world-news/uae-government-funding-uk-universities-radicalisation-muslim-brotherhood-126010900280_1.html). Available at https://www.business-standard.com/world-news/uae-government-funding-uk-universities-radicalisation-muslim-brotherhood-126010900280_1.html.

The UK has also warned of Muslim Brotherhood strategies towards “Islamist separatism,” the deliberate attempt to cut Muslim communities off spiritually, intellectually, and culturally from the surrounding secular society.¹⁹⁸ One typical manifestation is the “mega-mosque” building projects that have come under scrutiny around Europe, which generally contain community-like features such as schools, libraries, and gyms. As one UK review put it, “the objective of these projects is to make clients out of the local Muslim population and decrease their interaction with, and reliance on, state and social services.”¹⁹⁹ While other religious groups also provide various social services, the totalizing nature of the Muslim Brotherhood project and its hostile worldview towards its host country’s values create “the risk of preventing people within those communities from accessing the rights accorded to them by the state. . . . [.]”²⁰⁰

The American version of this pattern is EPIC City, a residential community project in North Texas, designed to be an exclusively Muslim city and branded as “the epicenter of Islam in America.”²⁰¹ Four cases are currently pending relating to the building of this Islamic community due to concerns of failing to comply with Texas statutes, including the Fair Housing Act.²⁰² CAIR-Texas and CAIR-DFW have publicly defended EPIC City in the disputes, and CAIR's national leadership has spoken at the EPIC mosque, reflecting an active advocacy relationship between CAIR and the EPIC religious community.²⁰³

¹⁹⁸ The Muslim Brotherhood in Britain: Analysis of Recent Sanctions, Counter Extremism Project, *supra*.

¹⁹⁹ The Muslim Brotherhood in Britain: Analysis of Recent Sanctions, Counter Extremism Project, *supra*.

²⁰⁰ The Muslim Brotherhood in Britain: Analysis of Recent Sanctions, Counter Extremism Project, *supra*.

²⁰¹ Mathilda Heller, “What Is EPIC City, the Controversial Planned Muslim Residential Community in Texas?,” *The Jerusalem Post* | *JPost.Com*, May 3, 2026, [What is EPIC City, the controversial planned Muslim community in Texas? | The Jerusalem Post](https://www.jpost.com/international/article-894994). Available at <https://www.jpost.com/international/article-894994>.

²⁰² *State of Texas v. East Plano Islamic Center, Inc., Community Capital Partners, LP, et al.*, Dist. Ct., Collin Cnty., Tex. (filed Dec. 5, 2025); *State of Texas v. Double R Municipal Utility District No. 2A, et al.*, Dist. Ct., Collin Cnty., Tex. (filed Feb. 2026); *State of Texas v. Double R Municipal Utility District No. 2A, et al.*, Dist. Ct., Collin Cnty., Tex. (filed May 4, 2026); *Community Capital Partners, LP v. Texas Workforce Commission, 201st Dist. Ct., Travis Cty., Tex. (Meachum, J.) (temporary injunction entered Apr. 28, 2026; the State’s plea to the jurisdiction denied Apr. 29, 2026)*, appeal filed, Tex. App.—15th Dist. (May 2026).

²⁰³ “CAIR-Texas Welcomes Court Ruling Ordering State Agency to Honor Agreement with 'EPIC City' Developers,” CAIR-Texas, April 30, 2026, https://www.cair.com/press_releases/cair-texas-welcomes-court-ruling-ordering-state-agency-to-honor-agreement-with-epic-city-developers/; “North Texas Faith Leaders Condemn Abbott's EPIC City Investigations,” Fox 4 Dallas—Fort Worth, April 8, 2025, <https://www.fox4news.com/news/cair-condemns-abbotts-epic-city-investigations>; “CAIR Exec

The Brotherhood's tactics look the same across allied democracies. Government assessments from six European countries reach a common conclusion: the political system the Brotherhood envisions is incompatible with the constitutional principles of popular sovereignty, freedom, and equality. The excerpts below are drawn from George Washington University's Program on Extremism's *What European Security Services Say About the Muslim Brotherhood in Europe*.²⁰⁴

Austria: "The political system aimed for [by the Muslim Brotherhood] is reminiscent of a totalitarian system, which guarantees neither the sovereignty of people nor the principles of freedom and equality. Such a fundamental position is incompatible with the legal and social norms of the Republic of Austria."²⁰⁵

Belgium: "The Muslim Brotherhood and its often highly-qualified members are found in many non-profit organisations and other groups in all areas of society. This makes it more influential and important than one would expect from its limited membership. The Muslim Brotherhood respects democratic rules and the law, and pursues supposedly legitimate goals in the short term. However, the discourse, beliefs and vision adopted internally in the longer term are contrary to the proper functioning of the constitutional order and democracy. To the State Security Service, the Muslim Brotherhood is an extremist movement."²⁰⁶

Germany: "These 'legalistic' Islamist groups represent an especial threat to the internal cohesion of our society. Among other things, their wide range of Islamist-oriented educational and support activities, especially for children and adolescents from immigrant families, are used to promote the creation and proliferation of an Islamist milieu in Germany. These endeavours run counter to the efforts undertaken by the federal administration and the Länder [states] to integrate immigrants. There is the risk that such milieus could also form the breeding ground for further

Director Nihad Awad: Working to Eliminate and Change Public School Textbooks That 'Defame' Islam and the Prophet Muhammad — In August 30, 2024 Friday Sermon at the East Plano Islamic Center in Texas," MEMRI TV, August 30, 2024, <https://memri.org/tv/cair-exec-director-nihad-awad-working-eliminate-change-public-school-textbooks-defame-islam-prophet>.

²⁰⁴ Lorenzo Vidino, "What European Security Services Say About the Muslim Brotherhood in Europe," GW Program on Extremism, October 2023, accessed April 29, 2026, [Verbatim: What European Security Services Say About the Muslim Brotherhood in Europe](https://extremism.gwu.edu/sites/g/files/zaxdzs5746/files/2023-09/verbatim-final_0.pdf). Available at https://extremism.gwu.edu/sites/g/files/zaxdzs5746/files/2023-09/verbatim-final_0.pdf.

²⁰⁵ Lorenzo Vidino, "What European Security Services Say About the Muslim Brotherhood in Europe," GW Program on Extremism, October 2023, accessed April 29, 2026, [Verbatim: What European Security Services Say About the Muslim Brotherhood in Europe](https://extremism.gwu.edu/sites/g/files/zaxdzs5746/files/2023-09/verbatim-final_0.pdf). Available at https://extremism.gwu.edu/sites/g/files/zaxdzs5746/files/2023-09/verbatim-final_0.pdf.

²⁰⁶ Vidino, What European Security Services Say About the Muslim Brotherhood in Europe, *supra*.

radicalization.”²⁰⁷

The Netherlands: “The Dutch Muslim Brothers are trying to gain influence in civil society. If they also participate in political decision-making without being open about their signature and thus their interests and intentions, this can lead to an undesirable solution.”²⁰⁸

Spain: “In the West, the actions of the Muslim Brothers present a common *modus operandi* in each host country. They present an image of integration and moderation. Their leaders do not usually publicly admit membership in the Muslim Brotherhood. Their leaders manage to become representatives of the main organizations of Islamic communities in the host country. In the political sphere they try to influence state decision-making that affects the Muslim community of the host country and to make the most of the legal and economic resources offered by the states, creating associative and service networks with the help of public resources. In the educational field, it is a priority to influence the religious formation of young Muslims settled in their host country. . . The propaganda scope of its work and ideology is another of its greatest priorities, with the use of media, editorials, and online communication.”²⁰⁹

Sweden: Under the leadership of Chakib Benmakhlouf, the Federation of Islamic Organizations in Europe (FIOE) adopted long-term, 20-year strategic plans guiding its activities across Europe. Consistent with the ideology of Yusuf al-Qaradawi, Benmakhlouf rejected distinctions between individual and society, as well as between politics and religion. He articulated this position explicitly, stating that “Islam is an indivisible whole; religion, politics, confession, worship, action, ethics and other,” thereby leaving little ambiguity about FIOE’s stance on individual freedom and democratic principles.²¹⁰ These alarming trends include Muslim Brotherhood members holding multiple positions in multiple civil society organizations simultaneously and often appointing relatives, from siblings to cousins, to similar positions within the ecosystem.²¹¹

The same pattern presents itself in the U.S.-based Brotherhood infrastructure. Familial relationship and overlapping leadership between IAP, AMP, and CAIR have been a salient fact for federal courts addressing whether successor organizations are

²⁰⁷ Vidino, What European Security Services Say About the Muslim Brotherhood in Europe, *supra*.

²⁰⁸ Vidino, What European Security Services Say About the Muslim Brotherhood in Europe, *supra*.

²⁰⁹ Vidino, What European Security Services Say About the Muslim Brotherhood in Europe, *supra*.

²¹⁰ Vidino, What European Security Services Say About the Muslim Brotherhood in Europe, *supra*.

²¹¹ The Muslim Brotherhood in Britain: Analysis of Recent Sanctions, Counter Extremism Project, *supra*.

alter-egos of the entities liable for David Boim’s murder.²¹²

VIII. Conclusion

In 1991, the Muslim Brotherhood committed to paper its work of “a kind of grand Jihad” by “eliminating and destroying the Western civilization from within.”²¹³ And for thirty-five years, the United States did not listen. The record now before this Committee makes that posture untenable.

CAIR leaders have shared stages and platforms with designated terrorists and FTO operatives; CAIR has moved a forty-five percent stake in its own headquarters to the North American Islamic Trust, an Islamic endowment that federal prosecutors named an unindicted co-conspirator in the Holy Land Foundation terrorism-financing case, and that now holds a veto over any sale or financing of the remainder²¹⁴; AMP and its affiliates trace a documented continuum from the Islamic Association for Palestine through the Holy Land Foundation to the IUMS, whose 90,000-scholar network issued a March 2025 fatwa declaring armed jihad obligatory; and the Boim family has spent more than twenty years pursuing the \$156 million judgment a jury awarded them for the murder of their American son.

None of this is speech. It is conduct, capital, and coordination.

The First Amendment was written to protect the dissenter from the state, not to shield organizational infrastructure from the disclosure obligations every other 501(c)(3) in this country must meet. France, the United Kingdom, the United Arab Emirates, Austria, Belgium, Germany, the Netherlands, Spain, and Sweden have each, through independent security review, arrived at the same conclusion. The pattern is no longer contested abroad. It can no longer be ignored at home.

The statutory authority already exists. 18 U.S.C. § 2339B reaches material support. 31 C.F.R. § 594.204 reaches services rendered for the benefit of a designated terrorist. Internal Revenue Code § 501(c)(3) reaches charitable entities operating

²¹² Boim v. American Muslims for Palestine, docket no. 1:17-cv-03591, U.S. District Court for the Northern District of Illinois, CourtListener, accessed April 29, 2026, [Boim v. American Muslims for Palestine, 1:17-cv-03591 – CourtListener.com](https://www.courtlistener.com/docket/6063090/boim-v-american-muslims-for-palestine/). Available at <https://www.courtlistener.com/docket/6063090/boim-v-american-muslims-for-palestine/>.

²¹³ Akram, An Explanatory Memorandum on the General Strategic Goal for the Group in North America, *supra*.

²¹⁴ Special Warranty Deed, Instrument No. 2026014277, and Memorandum of Agreement, Instrument No. 2026014278, D.C. Recorder of Deeds, *supra*. List of Unindicted Co-conspirators, *United States v. Holy Land Foundation for Relief and Development*, No. 3:04-cr-240-G (N.D. Tex. May 29, 2007), *supra*, investigativeproject.org.

outside their exempt purpose or for an illegal purpose. And 8 U.S.C. § 1189(b)(1) supplies a workable framework for treating successor and alter-ego organizations as what they are.

This Committee should direct that no further federal grant funds flow to CAIR, that its EOIR accreditation not be renewed, that OFAC apply the Global Terrorism Sanctions Regulations to CAIR's documented relationship with Hamas-affiliated actors, that the IRS open 501(c)(3) examinations, and that the Department of Justice pursue the investigations supported by the public record. Congress should also close the successor-organization loophole, mandate pass-through foreign-funding disclosure with automatic revocation for noncompliance, and impose meaningful sanctions on the discovery obstruction that has turned procedural delay into a substantive defense.

Members of this body have already begun to move. Senators Cornyn and Sheehy have introduced legislation to revoke CAIR's tax-exempt status;²¹⁵ Representative Roy has introduced H.R. 8236 to designate CAIR and suspend its 501(c)(3) status;²¹⁶ and Representatives Stefanik and Cotton have asked the Treasury to investigate whether CAIR is funded or directed by a foreign terrorist organization.²¹⁷ And the sanctions Congress authorizes for discovery obstruction should be concrete, Rule 11 sanctions, fee-shifting, and civil contempt, so that delay ceases to be cost-free.

The Brotherhood told us, in writing, what it intended to do. Our allies have heard them.

The cost of continuing not to listen is no longer theoretical. The work of this Committee is to ensure that the law catches up to what the record has already shown.

²¹⁵ Sen. John Cornyn, "Cornyn, Sheehy Introduce Bill to Revoke Tax-Exempt Status of CAIR, Groups Bankrolling Terrorists," December 18, 2025, [cornyn.senate.gov](https://www.cornyn.senate.gov/news/cornyn-sheehy-introduce-bill-to-revoke-tax-exempt-status-of-cair-groups-bankrolling-terrorists/). Available at <https://www.cornyn.senate.gov/news/cornyn-sheehy-introduce-bill-to-revoke-tax-exempt-status-of-cair-groups-bankrolling-terrorists/>.

²¹⁶ H.R. 8236, 119th Cong. (2026) (directing designation of CAIR and suspension of its 501(c)(3) status), [congress.gov](https://www.congress.gov/bills/119/congress-house/8236); Rep. Chip Roy press release, April 9, 2026, roy.house.gov. Available at <https://www.congress.gov/bills/119/congress-house/8236>; <https://roy.house.gov/media/press-releases/rep-roy-introduces-bill-designate-cair-specially-designated-global-terrorist>.

²¹⁷ "Stefanik and Cotton Send Letter to Treasury Secretary Bessent Requesting Investigation Into the Council on American-Islamic Relations," October 14, 2025, stefanik.house.gov. Available at <https://stefanik.house.gov/2025/10/stefanik-and-cotton-send-letter-to-treasury-secretary-bessent-requesting-investigation-into-the-council-on-american-islamic-relations>.