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Intelligent Advocacy Network
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R & A Program
Office of Legal Access Programs
Executive Office for Immigration Review
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Subject: Request for Investigation into CAIR-CA's Use of Department of Justice Funds and Executive Office of Immigration Review Accreditation Status

Dear R&A Program:

I. Introduction

The Department of Justice (DOJ) has the authority and duty to investigate and revoke the Executive Office of Immigration Review (EOIR) accreditation status of CAIR-CA. The Council of American Islamic Relations (CAIR), an unindicted co-conspirator in the Holy Land Foundation trial, should not receive [federal grant dollars](#) nor be accredited or endorsed through the DOJ Legal Access Program.

The Intelligent Advocacy Network (IAN), a nonpartisan community advocacy organization, calls for the DOJ to conduct an immediate investigation under 8 C.F.R. § 1292.19 and seeks a determination that CAIR-CA's EOIR continued accreditation is not in the public interest. **CAIR-CA's EOIR accreditation expired on February 22, 2025.** Its misuse of federal grant funding and support for Hamas, a U.S. designated foreign terrorist organization, do not meet the ethical and legal requirements necessary for EOIR continued accreditation.

A formal forensic audit followed by a proper DOJ investigation is necessary to evaluate the full extent of CAIR-CA's financial misconduct, compliance breaches, and support for terrorism. Provided herewith, please find the results of IAN's investigation including documents received in a series of public document requests from the State of California. A determination of CAIR-CA's disqualification from DOJ-funded programs is necessary to protect public funds and national security. DOJ's revocation of EOIR accreditation will halt the further granting of federal or state funds to CAIR-CA for immigration legal services.

IAN recognizes the essential role of federal funding in providing immigration legal services and ensuring access for vulnerable communities. However, these funds must be allocated to organizations that maintain transparency and comply with federal regulations. While culturally competent immigration services are important, CAIR-CA's documented support for Hamas—a U.S.-designated Foreign Terrorist Organization—along with its misuse of government resources, poses a direct threat to national security and renders it an unfit recipient of public funds.

II. Why CAIR-CA Must be Investigated

CAIR-CA was allocated \$7,217,968.44 of federal funds through the [Office of Refugee Resettlement](#) through a State of California program to provide immigration-related legal assistance. Documents produced by the State of California to the IAN through a lawful California Public Records Act request reveal financial irregularities with this funding that raise serious allegations as to whether CAIR-CA has complied with both federal and state regulations required in the receipt of this substantial governmental grant.

Documents obtained from the State of California confirm that CAIR-CA's funding relies on federal DOJ accreditation through its EOIR Legal Access Programs. Given the financial discrepancies in CAIR-CA's tax returns, its failure to comply with grant requirements, and its documented support for terrorism, the DOJ should formally terminate CAIR-CA's EOIR accreditation—which expired on February 22, 2025—and deny its pending recertification.

III. Sources of Government Funds

Documents produced by the State of California to the Intelligent Advocacy Network received through a lawful California Public Records Request show that CAIR-CA has received more than \$7 million in federal funding sent to the State of California which the state then subgranted to CAIR-CA. CAIR-CA funding includes:

- Afghan Legal Services Project (ALSP): CAIR-CA was allocated [\\$7,217,968.44](#) of federal funding through the State of California for immigration-related legal assistance to Afghan newcomers (grant number ALSP22-0002).
- Transformative Grant Funding: CAIR-CA was awarded [\\$2,627,261](#) under the Hate Incident Services and Prevention Funding Stop the Hate Program (grant number SG-TFM-22-010).
- Immigration Services Funding (ISF) Grant: CAIR-CA received [\\$595,300](#) for affirmative immigration legal services and education and outreach (grant number assigned to the award is SG-ISF-21-0019).

- DACA and Naturalization Application Filing Fees (DNAF) Grants (2022 & 2023): Administered by CHIRLA, CAIR-CA acted as a subgrantee with fiscal responsibilities receiving an additional \$123,250 of California CDSS funding to further immigration legal services.

IV. Financial Mismanagement and Ethical Violations

A review of CAIR-CA's financial reports, grant allocations, and service delivery records reveals several inconsistencies and areas of concern regarding misuse of government funds. This includes:

- **CAIR-CA Subgranted Funds to its Itself:** CAIR-CA is the only CAIR entity that is recognized as an independent 501(c)(3), as is required for EOIR accreditation. Documents provided to IAN reveal that CAIR-CA subgranted government funds to its own chapters, such as CAIR-LA, [CAIR-SD](#), CAIR-SFBA. These chapters are not separate non-profits, but rather operate under the CAIR-CA umbrella. These subgrants from CAIR-CA to CAIR-CA chapters raise serious legal concerns about whether CAIR simply shifted more [money to itself](#). In fact, documents show that the DOJ grant funds were given to "CAIR-LA" who then [subgranted](#) \$3,608,984.22 to CAIR-LA.
- **Grant Agreement Identifies a Nonexistent 501(c)(3) Entity:** The California Department of Social Services (CDSS) awarded [\\$7,217,968.44](#) of Office of Refugee Resettlement (ORR) federal funds (10/01/2022 – 09/30/2024) to the Council on American-Islamic Relations of Greater Los Angeles, an entity that does not exist as a registered 501(c)(3) nonprofit, lacks an EIN, and is not recognized by the IRS or the California Secretary of State.
- **Unreported Government Grants on CAIR-CA 990s:** CAIR-CA reported \$9,033,927 in its [2022 990](#) and \$17,558,566 in its [2023 990](#) under "Contributions and Grants" on its IRS Form 990s. However, it only specified \$127,269 as government grants in 2023 and reported \$0 in government grants in 2022. This raises serious concerns about CAIR-CA's financial transparency regarding taxpayer-funded grants revealed in the documents produced by the State of California. Failure to explicitly report millions in state and federal funding as government grants undermines accountability and raises questions about whether these funds were properly classified, accounted for, and used in compliance with nonprofit financial regulations.
- **Failure to Track and Report Subgrantee Fund Usage:** CAIR-CA, as the primary grantee for over \$5 million in federal funds, was responsible for subgranting and ensuring compliance. However, as the 2022 and 2023 990s for CAIR-CA reveal, there are no specific subgrantees identified. Though such subgrants should be specified in Schedule I or R, no such transparency is provided.
- **CAIR Used Multiple and Inconsistent Names in Grant Applications:** CAIR received [\\$595,300](#) from CDSS for naturalization, DACA, and affirmative remedies (1/1/2022 – 6/30/2024) under Council on American-Islamic Relations of CA. However, its [\\$2,627,261](#) Stop the Hate Program grant (8/1/2022 – 7/31/2025) was awarded to Council on American-Islamic Relations, omitting "California." Documents produced by the State of California to IAN reveal that CDSS sought clarification on the entity name. While some discrepancies may have been resolved, CAIR's inconsistent use of names across grants within the same period raises concerns about accountability and trackability.
- **Significant Unspent Funds:** CAIR-CA did not fully utilize its [\\$2.6 Million](#) Transformative Grant within the original grant period (August 1, 2022 through July 31, 2025). Instead of

reallocating the unspent funds or assessing program effectiveness, the California Department of Social Services extended the grant agreement by one year, moving the end date to [July 31, 2026](#).

- **Limited Output for Affirmative Immigration Remedies:** The 2022 and 2023 Immigration Services Funding Affirmative Immigration Remedies Application Reports indicate a low volume of affirmative actions filed and only a handful of successful immigration applications received, despite substantial funding. CAIR's grant agreement for the \$7 million in federal funding for the Afghan Legal Services money promised to serve 1,800 individuals with direct legal aid to 300 individuals through asylum, adjustment of status and temporary protected status. Yet, in fiscal year 2022, CAIR-CA reported only [66](#) affirmative immigration cases filed and [159](#) legal consultations. In fiscal year 2023, CAIR-CA reported only [71](#) affirmative immigration cases filed and only [127](#) legal consultations. The low service numbers call into question whether CAIR-CA fulfilled its grant obligations.
- **Education & Outreach (EO) Reports Show Discrepancies:** For fiscal year 2022, CAIR-CA reported reaching [3,468](#) individuals through education and outreach. However, it only detailed the broad topics covered for 1,015 individuals, without specifying who delivered the presentations (subgrantees, if any) or what specific information was provided. Similarly, in fiscal year 2023, CAIR-CA claimed to have provided education to [4,288](#) individuals, yet only disclosed the type of education delivered for 122 individuals, leaving a significant gap in transparency and reporting.

V. Legal Investigation Regarding DOJ EOIR Accreditation

The Intelligent Advocacy Network now asks the Department of Justice to investigate whether renewing CAIR-CA accreditation is in keeping with federal regulations and within the public interest.

The Department of Justice's Executive Office for Immigration Review provided accreditation to CAIR on March 24, 2015. Under this program CAIR-CA and its attorneys are permitted to provide legal services through non-attorney representatives to practice before EOIR and the Department of Homeland Security (DHS). CAIR-CA DOJ EOIR accreditation expired on February 22, 2025.

In order to maintain its status as a DOJ EOIR accredited organization and receive federal and state grants for immigration legal services, CAIR-CA must show that it has and continues to comply with the requisite federal regulations for this program under 8 C.F.R. §§ 1292.11–1292.20.

Under Section 8 C.F.R. § 1292.17 the EOIR Assistant Director for Policy or his delegate has the authority to administratively terminate an organization's recognition or a representative's accreditation and remove the organization or representative from the recognition and accreditation roster.

Pursuant to 8 C.F.R. § 1292.19, any individual may submit a complaint to EOIR or DHS that a recognized organization has engaged in behavior that is a ground of termination or otherwise contrary to the public interest.

Furthermore, EOIR must evaluate whether 28 CFR §§ 33.1 – 33.80 which outlines the regulation on block grants from the U.S. Department of Justice (DOJ) to states was properly followed for the over \$7 million of federal funds allocated to CAIR-CA.

CAIR-CA is the only CAIR affiliate listed on DOJ's portal as maintaining EOIR accreditation under the Legal Access Program. No CAIR entity outside of California has such authorization from the Department of Justice.

VI. Possible Grounds for Revocation of EOIR DOJ Accreditation

The DOJ EOIR accreditation process is designed to ensure high standards of legal representation for noncitizens. Compliance with federal law, particularly regarding national security and ethical obligations, is crucial. Federal and state regulations mandate strict oversight of organizations receiving government funding to prevent the misuse of taxpayer dollars.

1. Financial Mismanagement and Failure to Comply with Codes of Professional Conduct

DOJ must investigate CAIR-CA EOIR accreditation under the public interest standard as articulated 8 C.F.R. § 1292.19.

8 C.F.R. §§ 1292.11–1292.20 include requirements to comply with federal regulations including financial integrity, ethical representation of low-income immigrants, and proper supervision of subgrantees and staff.

8 C.F.R. §§ 1292.11 specifically mandates that the organization is a federal tax-exempt organization established in the United States. As the \$7million ORR grant application and agreement was entered into from Council on American Islamic Relations of Greater Los Angeles which is not a federal tax-exempt recognized organization, the validity of the grant and use of federal funds must be evaluated. Similarly, the subgrants to CAIR-CA chapters who are not separate tax-exempt organizations must be reviewed.

8 C.F.R. § 1003.101 et seq. outlines the professional conduct standards for attorneys and accredited representatives practicing before U.S. immigration courts, the Board of Immigration Appeals (BIA), and the Department of Homeland Security (DHS). The rules establish disciplinary procedures, grounds for sanctions, and enforcement mechanisms to ensure ethical and competent representation in immigration proceedings.

Any accredited entity found to have mismanaged federal funds and/or failed to provide ethical services promised must face revocation to ensure EOIR's commitment to protecting the integrity of legal representation in immigration proceedings.

2. Support for Terrorism and Terrorist Supporting Organizations

An investigation and potential revocation of DOJ EOIR accreditation for CAIR-CA under 8 C.F.R. § 1292.17 must also be evaluated in light of the organization's affiliation with and support of terrorism and terrorist supporting organizations. A non-exhaustive list of terrorism related laws and regulations which DOJ EOIR has the authority to review in its investigation of CAIR-CA's DOJ EOIR accreditation include:

- 18 U.S.C. § 2339A – Providing Material Support to Terrorists: Prohibits providing material support or resources to any person or entity engaged in terrorist activities.
- 18 U.S.C. § 2339B – Providing Material Support or Resources to Designated Foreign Terrorist Organizations (FTOs): Criminalizes knowingly providing material support or resources to organizations officially designated as Foreign Terrorist Organizations (FTOs) by the U.S. government.
- 18 U.S.C. § 2339C – Prohibitions on the Financing of Terrorism: Criminalizes directly or indirectly providing, collecting, or soliciting funds with the intent or knowledge that they will be used to carry out acts of terrorism.

Furthermore, the U.S. Department of the Treasury’s Office of Foreign Assets Control (OFAC) maintains lists of designated terrorist organizations and Specially Designated Nationals (SDNs). Both state agencies and nonprofits must verify that they are not associated with these prohibited entities.

Given CAIR-CA’s known connections to Hamas and other extremist organizations, support for terrorist acts, and its questionable financial practices, a full compliance review under anti-terrorism statutes and regulations is warranted.

VII. History of Council on American-Islamic Relations Ties to Extremism

CAIR was founded in 1994 as a Muslim civil rights and advocacy organization. Despite its stated mission, it has a long history of affiliation with extremism, combined with a persistent lack of financial transparency.

- **Documented Ties to Extremist Organizations:** In 2008, CAIR was an [unindicted co-conspirator](#) in the Holy Land Foundation trial. In 2014, the United Arab Emirates designated CAIR as a terrorist organization due to alleged connections to Hamas and other extremist groups.
- **Governmental Rejection of CAIR:** In December 2023, the White House severed ties with CAIR due to antisemitic statements made by its leadership. The FBI ended formal contact in 2008 due to concerns about CAIR’s ties to terrorism financing. The states of Florida and Maryland have formally distanced their legislatures and anti-hate council from CAIR for similar reasons.
- **Support of Hamas.** Following the October 7, 2023, terrorist attacks in Israel where approximately 1200 Israelis were killed and 250 taken hostage, CAIR's founder and current national Executive Director, Nihad Awad, publicly expressed his happiness over the events. Indeed, Nihad Awad, has a long association with Hamas having publicly stated over thirty years ago, “I am in support of the Hamas movement”.
- **Financial Transparency Issues:** In November 2024, a U.S. magistrate judge ordered CAIR to disclose its funding sources due to concerns about financial transparency and alleged foreign funding tied to Hamas and the Muslim Brotherhood. CAIR settled the underlying suit out of court in February of 2025, rather than [disclose its funding](#).
- **Legislative Scrutiny:** On September 11, 2024, the U.S. House of Representatives passed H.R. 9495, a bill targeting tax-exempt organizations suspected of supporting terrorism. CAIR actively opposed the legislation saying it was “anti-Palestinian.”

VIII. CAIR California’s Malign Influence

[CAIR-CA](#) has become one of the most politically influential and well-financed branches of CAIR receiving millions in taxpayer dollars while leveraging public partnerships and taxpayer-funded programs to expand its influence and solidify its legitimacy. Despite its classification as an independent 501(c)(3) nonprofit, CAIR-CA maintains strong ideological and operational ties to CAIR’s national organization and its well-documented extremist affiliations.

- **Recent Statements Supporting Terrorism by CAIR-CA Leadership:** After the October 7, 2023 Hamas terrorist attacks in Israel, CAIR-CA CEO Hussam Ayloush, asserted that “Israel should be attacked.” On October 7 Zahra Billo, CAIR-CA Executive Director-San Francisco Bay Area, referred to the Hamas attacks as “decolonization.” In July 2024, she praised deceased Hamas leader Ismail Haniyeh, a U.S.-designated Specially Designated Global Terrorist who was indicted by the U.S. Justice Department for conspiracy to murder American nationals.
- **Influence on Public Education:** CAIR-CA exerts direct influence over California’s public education system. The organization has aggressively pushed for the inclusion of anti-Zionist narratives within California’s Ethnic Studies Curriculum, a mandatory educational framework for K-12 students.
- **Suppression of Transparency in Public Policy:** CAIR-CA has exhibited a selective approach to government transparency. While utilizing open-meeting laws to advance anti-Israel resolutions in municipal forums, CAIR-CA opposed transparency when it conflicted with its interests. In Santa Ana, CAIR-CA supported the school district’s violation of California’s Brown Act—which ensures public access to government decision-making—by developing an ethnic studies curriculum in secret, excluding public input, and incorporating antisemitic content. This led to a lawsuit and a subsequent settlement requiring the district to cease teaching the biased courses until they could be redesigned with public participation.
- **Legislative and Policy Advocacy:** CAIR-CA has played a pivotal role in lobbying against California state legislation that supports Holocaust and genocide education. In 2024, CAIR-CA opposed California Senate Bill 1277, which sought to expand Holocaust and genocide education to include historical atrocities such as the Armenian, Rwandan, and Uyghur genocides. By opposing this measure, CAIR-CA demonstrated its willingness to disregard historical truths in favor of its ideological objectives.
- **Promotion of Extremism in Local Politics:** CAIR-CA has strategically embedded itself within California’s local political landscape, influencing city councils, school boards, and public institutions.
- **Hostile Campus Environment:** CAIR-CA has actively supported student groups that promote hostility toward Jewish and pro-Israel students on college campuses, through legal and organizational support.

IX. A Comprehensive Investigation is Warranted

The Intelligent Advocacy Network requests that DOJ review the EOIR accreditation of CAIR-CA and immediately undertake the following actions:

1. **Conduct a Forensic Audit:** Assess CAIR-CA's financial records to determine if government funds were improperly reported or misallocated.
2. **Audit Subgrantee Fund Distribution:** Investigate whether funds allocated to subgrantees were properly used and reported and whether all subgrantees met federal and state regulatory requirements. This includes concerns where CAIR-CA sub-granted to its own local branches.
3. **Investigate Grant Utilization:** Review CAIR-CA's failure to fully utilize allocated funds.
4. **Evaluate DOJ Accreditation Compliance:** Determine whether CAIR-CA meets all requirements under 8 C.F.R. §§ 1292.11–1292.20 and Form EOIR-31.
5. **Investigate Compliance with Anti-Terrorism Laws:** Determine if CAIR-CA has violated federal and state regulations prohibiting funding to organizations that support terrorism.
6. **Initiate Revocation Proceedings:** If violations are confirmed, take action to revoke CAIR-CA's recognition and accreditation.
7. **Sanctions and Revocation:** If misconduct is found, impose sanctions under 8 C.F.R. § 1292.17.

IV. Conclusion

CAIR-CA should not be granted reaccreditation by DOJ EOIR. Serious mismanagement of funds, failure to maintain ethical standards of professional conduct, and failure to properly manage subgrants warrants revocation. Likewise, violation of anti-terrorism statutes or use of DOJ EOIR accreditation in a manner not consistent with the public interest necessitates a rescission of Legal Access Program accreditation.

The Intelligent Advocacy Network requests scrutiny of all of CAIR-CA ongoing contracts with the State of California, including a substantial subgrant from the federal Department of Justice. CAIR-CA's legal DOJ EOIR accreditation must be immediately investigated and properly terminated.

Sincerely,



Susan George, CEO

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Julie Marzouk, Founding Board Member

[Intelligent Advocacy Network](#)

Attachment: Exhibit A - Executive Summary

EXHIBIT A

Executive Summary

Urgent Need for DOJ Investigation into CAIR-CA's Misuse of Federal Funds and EOIR Accreditation

The Intelligent Advocacy Network (IAN), a nonpartisan community advocacy organization, submits a complaint with the Department of Justice (DOJ) urging an investigation into the Council on American-Islamic Relations California (CAIR-CA's) use of [federal funds](#) and its Executive Office for Immigration Review (EOIR) accreditation. IAN asserts that CAIR-CA's EOIR accreditation, which expired on February 22, 2025, should not be renewed due to financial misconduct, regulatory noncompliance, and ties to extremism. CAIR-CA has failed to meet EOIR's ethical and legal requirements warranting a formal DOJ investigation and a forensic audit. This document summarizes the formal complaint submitted by IAN to the EOIR.

The complaint highlights CAIR-CA's receipt of over \$7 Million in federal grants from the Office of Refugee Resettlement (ORR) for the Afghan Legal Services Project (ALSP). IAN cites financial irregularities, including unreported government grants on CAIR-CA's IRS filings, subgrants to itself, and the use of non-legal entities in its grant agreements. IAN outlines the Council on American-Islamic Relations (CAIR's) [connections to Hamas](#), a U.S.-designated Foreign Terrorist Organization, and statements from CAIR-CA leadership supporting terrorism.

IAN's complaint calls for a DOJ forensic audit, an evaluation of CAIR-CA's compliance with EOIR accreditation rules under 8 C.F.R. §§ 1292.11–1292.20, and a review of adherence to anti-terrorism laws, including 18 U.S.C. § 2339B (providing material support to a designated terrorist organization).

Key Facts:

- CAIR-CA's funding is dependent on federal DOJ EOIR accreditation. A DOJ decision to revoke EOIR accreditation will terminate CAIR-CA's misuse of public funds.
- CAIR-CA was allocated [\\$7,217,968.44](#) of federal funding through the State of California. This money was granted to an entity without a proper federal tax identification EIN.
- CAIR-CA appears to have [subgranted](#) government funds to its own chapters who are not separate legal entities raising concerns about whether it simply shifted more [money to itself](#).
- CAIR-CA IRS 990s report \$9,033,927 in its [2022 990](#) and \$17,558,566 in its [2023 990](#) under "Contributions and Grants," but only specify \$127,269 as government grants in 2023 and reported \$0 in government grants in 2022.
- CAIR-CA was responsible for subgranting more than \$5 million in federal funds, but their 2022 and 2023 990s do not identify specific subgrantees.
- CAIR-CA was also awarded [\\$2,627,261](#) under the California Stop the Hate Program. Improper naming in grant documents raise questions about the oversight of the [\\$2,627,261](#).

- CAIR-CA's leadership has publicly [supported Hamas](#) and endorsed terrorist violence. Its umbrella organization, CAIR, was an unindicted co-conspirator in the largest U.S. terror-financing case.

Recommended Actions:

1. Conduct a forensic audit to assess financial mismanagement, ethics violations, and grant misuse.
2. Initiate a formal DOJ investigation into CAIR-CA's grant compliance failures and extremist ties.
3. Determine CAIR-CA's disqualification from DOJ-funded programs and EOIR accreditation to prevent further abuse of taxpayer funds.

Given the overwhelming evidence of financial misconduct, regulatory violations, and extremist affiliations, the DOJ must act decisively to safeguard public funds and national security.