

CAIR and the Foreign Agents Registration Act

By the Center for Security Policy's CAIR Observatory
(<http://cairobservatory.org>)

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Introduction

This analysis is a work-in-progress and we will continue to update it. We include it here in order to provide our best effort to date in assessing whether the Council on American Islamic Relations should be registered as a foreign agent under the [Foreign Agent Registration Act \(FARA\)](#).

We argue that CAIR qualifies under FARA as a foreign agent because it has taken cash, loans, pledges of donations and real property from foreign principals; has held numerous meetings, conducted correspondence and received direction from foreign principals; and in return has sought to influence domestic and foreign policy through political activities and public information activities directed at elected officials, government employees, law enforcement employees at all levels of government, the media, businesses large and small, civil society organizations, and individuals. Whether one agrees or disagrees with CAIR's political activities is irrelevant as to whether or not CAIR should be registered as a foreign agent under FARA. CAIR's activities fit all definitions of a foreign agent under FARA.

Documentation

A variety of documents were used in this analysis. The case as presented here is fully referenced with public domain sources. Other passages have been redacted because they are based on documents that are involved in pending litigation and cannot be revealed to the public at this time.

CAIR Prior Claims Concerning Receipt of Monies from Foreign Donors

CAIR's public statements about receiving foreign funds have changed over time from flat denials to carefully-worded admissions. They are useful as a comparison to the actual facts and as a comparison to the wording in the FARA law. According to [FARA 611 \(b\)](#) a foreign principal is defined as "a government of a foreign country and a foreign political party... a person outside of the United States... a partnership, association, corporation, organization, or other combination of persons organized under the laws of or having its principal place of business in a foreign country..."

In a [press release](#) issued after 9-11, CAIR officials flatly asserted: “We do not support directly or indirectly or receive support from any overseas group or government.”

In 2008, in response to an appeal of a dismissed lawsuit by radio host Michael Savage, CAIR issued a [statement](#) saying “CAIR is proud to receive support of every individual, as long as they are not an official of any foreign government and there are no strings attached to the bequest.”

In January 2009, in a [public statement](#) made by CAIR in response to a decision in the Michael Savage lawsuit, they stated: “There is nothing criminal or immoral about accepting donations from foreign nationals...The U.S. government, corporations and non-profit organizations routinely receive money from foreign nationals.” This statement was meant to counter allegations of impropriety at CAIR’s receiving [\\$500,000](#) from Saudi billionaire Prince Al-Walid Bin Talal. “Bin Talal is not a member of the Saudi Arabian government,” CAIR added. “He is a private entrepreneur and international investor.”

At their current (February 2010) website, in a document titled [“Dispelling Rumors about CAIR”](#), they state: “CAIR’s operational budget is funded by donations from American Muslims. While the majority of CAIR’s financial support comes from American Muslims, CAIR is proud to receive the support of every individual—whether Muslim, Christian, Jewish, or of another faith background—who supports the organization’s mission of promoting justice and mutual understanding. This willingness to accept support from foreign nationals exists as long as there are no ‘strings’ attached to the bequest.”

Whether CAIR is willing to accept these funds (and conduct political and public information activities to support the interests and goals of their donors) is not the point as far as FARA is concerned; the question is whether that acceptance requires them to register as a foreign agent. As to the equivocal phrase “as long as there are no ‘strings’ attached to the bequest,” the Department of Justice established in the Holy Land Foundation trial that CAIR was created as an offshoot of the Islamic Association of Palestine. As a Muslim Brotherhood affiliated organization, CAIR’s actual mission is in alignment with the political agendas of its foreign funders. CAIR is a willing foreign agent in these transactions, and certainly not some kind of unwilling contractor compelled by “strings” of obligations they would not otherwise undertake.

CAIR and Shrinking Member Support

CAIR has been consistent in its statements that “American Muslims” provide the bulk of its support. In order to understand the importance of CAIR’s receipt of foreign funding, it is necessary to understand their lack of support from member dues.

CAIR has consistently claimed apparently inflated membership numbers in their 15 years of existence. For example, a [document](#) released January 19, 2007 claimed that CAIR had “some 50,000 members.” The facts of CAIR’s shrinking support were presented on June 11, 2007, when Audrey Hudson of the Washington Times published an [article](#) based on tax documents showing that CAIR’s membership had dropped from a high of 29,000 in 2000 to a mere 1,700 in 2006. And we know from their [2004](#), [2005](#) and [2006](#) IRS 990 tax forms that their reported membership revenue fell from \$119,029 in 2004 to \$41,383 in 2006.

Even more disturbing, as CAIR’s membership dues from their Muslim American supporters have fallen drastically, their reported total revenue has increased. Not that membership dues were ever a significant part of their support – between 2004 and 2006, Muslim American [membership dues fell](#) from an already tiny 5% of CAIR’s total revenue, to a miniscule 1%.

	2004	2005	2006
Member\$	\$119,029.00	\$65,377.00	\$41,383.00
Total Revenue	\$2,368,674.00	\$2,251,526.00	\$2,760,752.00
Member\$/Revenue	0.05	0.03	0.01

And that falling support from Muslim American members was reported *before 2007* – that is, before CAIR had been named as an unindicted co-conspirator in the Holy Land Foundation terrorism finance trial, before CAIR had been sued in 2008 by Muslim, African-American and Hispanic families for fraud in a case now on appeal, and before CAIR had ties severed by the FBI, as announced in 2009. So it’s possible the support has fallen even more in the last three years, perhaps well below 1%.

Member pledges of support at CAIR annual fundraisers – another legitimate means of gathering Muslim American funding – has not been profitable for CAIR. For example, CAIR’s three most recent publicly available IRS 990 tax returns show a large net loss of \$107,216 in “special events revenue” for “annual dinner” in [2004](#), a similar loss of \$59,494 in [2005](#), and incomplete information for [2006](#).

	Gross Receipts	Contrib. Included	Gross Revenue	Direct Expenses	Net Income
2004 990 Statement 3	\$170,389	\$124,688	\$45,701	\$152,917	-\$107,216
2005 990 statement 3	\$132,421	\$84,936	\$47,485	\$106,979	-\$59,494
2006 990 statement 3	\$89,775	\$89,775	[No Entry]	0	0

Furthermore, according to the [2009 event registration form](#) and printed programs from [2006](#), [2008](#) and [2009](#), a significant source of donations for these events comes from foreign donors including foreign embassies and governments.

Non-Profit Status Not An Exemption

The Council on American Relations is a network of related non-profit corporations, including 501c4 and 501c3 corporations, as well as the for-profit corporations Greater Washington LLC of Delaware and the Zahara Corporation. The fact that this network of corporations includes non-profit corporations should not qualify as an exemption under the FARA statute, which only allows for an exemption under [613\(e\)](#): “Any person engaging or agreeing to engage only in activities in furtherance of bona fide religious, scholastic, academic, or scientific pursuits or of the fine arts.”

Because the CAIR network of corporations are engaged in public education on political policy issues, political advocacy and lobbying activities, they do not qualify under any of those categories. Furthermore, other non-profit corporations have set a precedent by complying with FARA registration requirements. In a cross-search of both the [FARA online database](#) of active registrants for the years 2005-2009, and the [Guidestar.org online database](#) of non-profit organizations, we found that the following organizations are both FARA registrants and non-profit corporations ([See documentation here](#)):

- Business Council for International Understanding, Inc. (BCIU) (501c3)
- Hong Kong Trade Development Council Inc (501c6)
- International Relief Fund Inc. (DBA International Forum Institute in Jacksonville, FL) (501c3)
- Korea-United States Exchange Council (501c3)
- Korea Economic Institute of America (501c6)
- World Zionist Organization – American Section (501c3)

A more comprehensive search that includes earlier years may find additional organizations that were both FARA active registrants, and non-profit corporations.

Lobbying Under Lobbying Disclosure Act Not an Exemption

The CAIR network of corporations is not registered under the Lobbying Disclosure Act, in whole or in part, based on our online searches for all variants of the corporate name. Therefore they are not exempt under the Lobbying Disclosure Act provision in [613 \(h\)](#) of the FARA statute.

Summary of Contributions, Income, Money or Things of Value

The FARA foreign agent registry is organized by country categories, whether the actual foreign principals are persons, organizations, businesses, political parties or sovereign governments.

CAIR has been a foreign agent for various entities based in four foreign countries: Saudi Arabia, Kuwait, the UAE and Iran. (They also received a donation from the Holy Land Foundation, based in the U.S. but convicted of funding foreign terrorist groups – we include that because of the foreign association and the donation).

A Prefatory Note on the OIC Special Case: CAIR received at least [\\$325,000](#) from the Organization of the Islamic Conference (OIC), which is a special case in terms of FARA categories. For purposes of FARA categories, we suggest treating the OIC-CAIR relationship as a Saudi Arabian-based organization, since the OIC Headquarters office is based in that country. But the OIC is more importantly an international organization of 57 Islamic states, and we suggest that their political leadership reflects common goals of the four states funding CAIR directly as well (indeed that is the very *raison d'être* of the OIC, to define and achieve common goals). The OIC's legitimacy as an international institution is enhanced by its recognition by the

U.N., and a portion of the OIC UN mission is worth noting here, because it is relevant to understanding the importance and indeed primacy (shared with Saudi Arabia) of the OIC as a foreign principal to CAIR, and CAIR's role as a foreign agent for the OIC:

The Permanent Observer Mission of the OIC to the UN in New York was established following the adoption of the Resolution 3369 on October 10, 1975 by the 30th UN General Assembly (UNGA) Session granting the OIC an observer status. Today, thanks to the tireless efforts of the OIC Secretary General who has made it his priority to activate the OIC's relationship with the United Nations, the US Government, the OIC Groups in New York and Washington DC, the US-based think tanks, opinion and policy makers, academics, media and mainstream Muslim communities in the US, the OIC Mission enjoys very high profile as a crucial bridge between the Muslim world and the UN as well as the United States. These initiatives of the Secretary General are in line with the goals outlined in the OIC's new Charter, New Vision and the **Ten Year Program of Action (TYPOA)**.... ([Source: OIC Permanent Observer Mission to the United Nations in New York](#))

We emphasize the [OIC Ten Year Plan of Action](#) because that document defines (in article VII) the Islamophobia campaign which is a centerpiece of OIC political activities in the United States, and of CAIR's representation of the OIC as a foreign agent. The OIC relationship, and the Islamophobia campaign, is treated as a special case later.

FARA Statute on Contributions: *Every person who becomes an agent of a foreign principal shall file with the Attorney General within ten days thereafter. The registration must include a statement regarding ["the nature and amount of contributions, income, money, or thing of value, if any, that the registrant has received within the preceding sixty days from each such foreign principal, either as compensation or for disbursement or otherwise, and the form and time of each such payment and from whom received."](#) [The foreign agent must supply a supplemental statement of such monies received for each 6 month period thereafter.](#)*

CAIR, while acting as a foreign agent, has failed to report the following information:

FOREIGN FUNDING TRANSACTIONS:

1. On June 13, 1994, CAIR received a [\\$5,000 check](#) from the International (Islamic) Relief Organization (IIRO), a group founded by Saudi royal decree and affiliated with the Muslim World League.
2. On October 5, 1994, CAIR received a [\\$5,000 check](#) from the Holy Land Foundation (HLF), a group shut down by the U.S. government in 2001 and convicted in 2008 of funding the terrorist group HAMAS.
3. On October 31, 1994, CAIR received another [\\$5,000](#) from the Holy Land Foundation via wire transfer.
4. In 1995, CAIR received an additional [\\$2,172](#) from the IIRO.
5. In 1997, CAIR received another [\\$10,000](#) from the IIRO.

6. In 1999 the United Bank of Kuwait, the same bank used by the Kuwaiti Embassy, provided a [mortgage loan of \\$2,106,251.00](#) for CAIR's New Jersey Avenue headquarters just three blocks from the Capitol Building in Washington, D.C.
7. On August 15, 1999, the Islamic Development Bank (IDB), a financing organ of the Organization of the Islamic Conference (OIC) based in Jeddah, Saudi Arabia, made a [\\$250,000 contribution](#) toward the future headquarters of a CAIR-run education and research center in Washington, D.C.
8. On December 23, 1999 *Arab News* reported that the World Assembly of Muslim Youth (WAMY), a Riyadh-based organization founded by Saudi King Fahd, was extending [financial support to CAIR for a \\$3.5 million Washington, D.C. headquarters](#).
9. On September 12, 2002, the UAE-based Al-Maktoum Foundation bought out the United Bank of Kuwait "lease to purchase agreement" with a [\\$978,031.34 "deed of trust"](#) granting CAIR the title to its New Jersey Ave headquarters while Al-Maktoum reserved the right to sell, manage or collect rents from the property.
10. In November 2002, CAIR received a [\\$500,000 donation](#) from Prince Al-Walid bin Talal of Saudi Arabia.
11. On November 9, 2002, *The Muslim World* newspaper reported that CAIR and the World Assembly of Muslim Youth (WAMY) would collaborate on a [\\$1.04 million public relations campaign](#).
12. On May 22, 2006 a delegation of CAIR officials met with Al Habtoor group chairman Khalaf Al Habtoor and other businessmen in Dubai about funding a [\\$50-million public relations campaign](#) to change alleged "negative public perceptions about Islam." During this meeting, CAIR Chairman Parvez Ahmad [stated](#), "Do not think about your contributions as donations. Think about it from the perspective of rate of return. The investment of \$50 million will give you billions of dollars in return for 50 years."
13. On May 26, 2006, the Minister of Finance of the United Arab Emirates, Sheikh Hamdan bin Rashid Al-Maktoum, personally approved the building of an [endowment property for CAIR](#) in the United States.
14. In January 2007, Secretary General Ekmeleddin Ihsanoglu of the Organization of the Islamic conference promised to contribute [\\$325,000](#) to CAIR for the purpose of organizing a conference on Islamophobia at Georgetown University.
15. On May 19, 2007, Saudi Prince Abdulla bin Mosa'ad, Chairman of Saudi Paper Manufacturing Group and nephew of the King of Saudi Arabia, transferred [\\$112,000](#) to CAIR.

Summary of Foreign Principals For Whom CAIR has Acted as a Foreign Agent, Including Meetings and Political Coordination and Direction

FARA Statute on Foreign Principals: The term ["foreign principal"](#) encompasses not only the government of a foreign country, but also:

- *a foreign political party*

- *a partnership, association, corporation, organization, or other combination of persons organized under the laws of or having its principal place of business in a foreign country*
- *a person outside of the United States, unless it is established that such person is an individual and a citizen of and domiciled within the United States*

CAIR has acted as a foreign agent of the Jeddah, Saudi Arabia-based Organization of the Islamic Conference (OIC), an association of 57 Islamic states promoting Muslim solidarity in economic, social, and political affairs. CAIR has also acted as a foreign agent for and received contributions from member states of the OIC, including Saudi Arabia, Kuwait, Iran and the UAE. CAIR's initiatives in the United States have aimed to further the OIC's global vision, which is succinctly articulated in the OIC's 2005 communiqué known as the "[Ten-Year Program of Action](#)" for the Muslim Ummah. In some cases CAIR has coordinated directly with the OIC, or the OIC financing institution (originated by the OIC), the Islamic Development Bank (IDB). At other times government officials and wealthy members of ruling royal families of OIC member states such as Saudi Arabia, the United Arab Emirates, Kuwait and others have acted as mediators or as the primary actor in the foreign principal role. The following is a selection of cases in which CAIR has coordinated with such foreign principals and failed to report these interactions as a registered foreign agent to the Department of Justice in contravention of the requirements of FARA:

FOREIGN MEETINGS AND COORDINATION:

1. On July 3, 1998 the *Saudi Gazette* reported that CAIR's Executive Director Nihad Awad addressed a press conference at the [WAMY headquarters](#) in Riyadh, Saudi Arabia. According to the report, "He [Awad] said CAIR needed funds to fight discrimination against Muslims, to promote the true image of Islam and to combat the anti-Islamic propaganda."
2. According to a December 23, 1999 *Arab News* article, WAMY would "[introduce](#) CAIR to Saudi philanthropists and recommend their financial support for the headquarters project."
3. On October 1, 2001 *Arab News* reported that CAIR Chairman Omar Ahmad was [visiting](#) Riyadh and Jeddah, Saudi Arabia to "meet Islamic scholars and senior government officials."
4. On July 8, 2002 Secretary-General of the Muslim World League (MWL) Dr. Abdullah bin Abdulmohsin Al-Turki [visited](#) CAIR headquarters in Washington, D.C.
5. On November 9, 2002, *The Muslim World* newspaper reported that CAIR and the World Assembly of Muslim Youth (WAMY) would [collaborate](#) on a \$1.04 million public relations campaign.
6. The [same article](#) noted that CAIR Executive Director Nihad Awad had already met with leading Saudi businessmen at the Riyadh Chamber of Commerce and Industries on November 12, 2002 to brief them about projects and raise funds. Prince Al-Walid bin Talal was among the top businessmen he was scheduled to meet during his trip.
7. On October 27, 2003 CAIR-Maryland Executive Director Seyed Rizwan Mowlana [enlisted](#) the help of the Pakistani Ambassador Ashraf Jehangir Qazi in taking punitive action against Bank of America for [alleged "Islamophobic" behavior](#).

8. On April 20, 2006 CAIR-Chicago Executive Director Ahmed Rehab [sat on a Mosque Foundation-sponsored panel](#) with Saudi Prince Turki al-Faisal during his visit to Chicago.
9. On May 22, 2006 a delegation of CAIR officials [met](#) with Al Habtoor group chairman Khalaf Al Habtoor and other businessmen in Dubai about a \$50-million public relations campaign to change negative public perceptions about Islam. This was immediately after the Dubai Ports controversy. During this meeting, CAIR leader Parvez Ahmad stated, “Do not think about your contributions as donations. Think about it from the perspective of rate of return. The investment of \$50 million will give you billions of dollars in return for 50 years.”
10. During the same trip the CAIR delegation [met](#) with the Minister of Finance of the United Arab Emirates, Sheikh Hamdan bin Rashid Al-Maktoum, securing a pledge for an endowment property for CAIR in the U.S..
11. On June 21, 2006 a CAIR delegation [addressed a press conference](#) regarding CAIR’s \$50 million media campaign at the headquarters of the World Assembly of Muslim Youth (WAMY) in Riyadh, Saudi Arabia.
12. At the same press conference Arab News quoted CAIR Executive Director Nihad Awad. Commenting on the aforementioned \$50 million media campaign he said: [“We are planning to meet Prince Alwaleed ibn Talal for his financial support to our project. He has been generous in the past.”](#)
13. A June 22, 2006 [unclassified U.S. State Department memo](#) documents a CAIR delegation’s “courtesy call” to the U.S. Embassy in Riyadh, Saudi Arabia. The delegation had already visited Mecca and Jeddah. CAIR told embassy personnel that “‘King Abdullah knows CAIR very well’ and receives regular updates on the group’s projects.” They recalled the success of a CAIR visit to the UAE in May and they predicted they would be back in the region by fall to visit Kuwait and Qatar.
14. On September 8, 2006 national CAIR leaders including Executive Director Nihad Awad and Communications Director Ibrahim Hooper [hosted](#) Former Iranian President Mohamed Khatami at a private dinner .
15. On September 23, 2006 CAIR-Chicago and the OIC held a [joint press conference](#) on Islam/West relations at the Drake Hotel in Chicago. The conference addressed the Pope’s “Islamophobic” comments of 11 days earlier in which he quoted a 14th century Byzantine Emperor’s views on Islam; comments which were labeled a “smear campaign” by the OIC.
16. In October 2006 CAIR [hosted](#) an Iftar with the Pakistani ambassador. The Ambassador praised CAIR’s work and then joined 30 guests and CAIR staff for prayer, dinner and discussion.
17. At the [October 28-29, 2006 CAIR national board meeting in Chicago](#), the board mentioned that it was reviewing the plans of DC public relations firm Hill and Knowlton and that they would then be passed on to the UAE Ambassador for further analysis. The UAE Ambassador would then gather all the Gulf Cooperation Council (GCC) ambassadors and have them listen to a presentation so that “in return, hopefully they will write to their respective people to ask for support of the initiative.”
18. It was noted at the same board meeting that a CAIR representative had [met the Lebanese ambassador](#) to the United States about the 2006 Lebanon War.
19. Foreign attendees at CAIR’s [12th Annual Banquet](#) on November 18, 2006 included representatives of the Embassy of Egypt, the Embassy of Jordan, the Embassy of

Malaysia, the Embassy of Pakistan, the Embassy of Qatar, the Embassy of Saudi Arabia, the Embassy of the United Arab Emirates, the Interests Section of the Islamic Republic of Iran and delegates from the Kuwait Ministry of Awqaf.

20. In 2007 CAIR Executive Director Nihad Awad [collaborated](#) with OIC Secretary General Ekmeleddin Ihsanoglu for the purpose of organizing a conference on Islamophobia at Georgetown University.
21. In 2007 Nihad Awad, Khalid Iqbal, and Mohammed Nimer of CAIR helped to formulate an [“American Muslim Peace Initiative for Iraq” \(AMIPI\)](#) which included plans to “Lobby Transnational Islamic/Arab Agencies (OIC, Arab League) to commit to peacekeeping forces in Iraq” in an effort to replace U.S. troops with those from Muslim-majority countries.
22. In 2007, the OIC published online a [draft version](#) of the “First Annual Report on Islamophobia.” This draft, still available online, included a passage describing a meeting with CAIR, removed in the final version of the report (see Case Study #1 below).
23. On July 3, 2007 CAIR Executive Director Nihad Awad [attended a meeting](#) with OIC Secretary General Ekmeleddin Ihsanoglu in Jeddah, Saudi Arabia. Awad told *Arab News* he was “pleased to meet with Ihsanoglu to discuss the situation of Muslims in the United States and to work on future projects.”
24. In early June 2008 CAIR representatives including Nihad Awad and Larry Shaw traveled to a [three-day Muslim-only conference in Mecca](#) attended by hundreds of scholars and religious leaders. The conference was organized by the Muslim World League (MWL) on an initiative of Saudi Arabia’s King Abdullah. This was a precursor to the “interfaith” Madrid Summit that took place a month later. In addressing the conference King Abdullah called Islam “the greatest of all the religions” and emphasized that “Muslim countries also need to protect their resources from Zionism to foil their designs.”
25. On July 16, 2008 CAIR Executive Director Nihad Awad, CAIR Board Member Larry Shaw and CAIR National Communications Director Ibrahim Hooper took part in the [World Conference on Dialogue](#), organized by the Muslim World League (MWL) under the patronage of Saudi King Abdullah in Madrid, Spain. *The Madrid Declaration* affirmed by all participants emphasized “respecting heavenly religions, preserving their high status, condemning any insult to their symbols” and encouraged “governmental and non-governmental organizations to issue a document that stipulates respect for religions and their symbols, the prohibition of their denigration and the repudiation of those who commit such acts.” These pronouncements are in accord with the “deterrent punishments” for “Islamophobia” prescribed by the OIC Ten Year Plan.
26. Foreign attendees at CAIR’s [14th Annual Banquet](#) on November 23, 2008 included representatives of the Embassy of Bahrain, the Embassy of Jordan, the Embassy of Kuwait, the Embassy of Qatar, the Embassy of Saudi Arabia, the Embassy of the United Arab Emirates, the Interests Section of the Islamic Republic of Iran and the League of Arab States.
27. Foreign attendees at CAIR’s [15th Annual Banquet](#) on October 24, 2009 included representatives of the Embassy of Bahrain, the Embassy of Libya, the Embassy of Qatar and the Embassy of Saudi Arabia.

NOTE: Private documents exist indicating hundreds of contacts between CAIR and foreign principals including representatives of foreign governments, businesses, NGO’s and individuals,

all of which potentially come under FARA. Due to ongoing litigation we cannot reproduce those documents here at this time.

Summary of CAIR Efforts to Act As a Foreign Agent, In Political Activity and Public Relations Activities

*FARA Statute: The term **“agent of a foreign principal”** refers to any person who acts as an agent, representative, employee, or servant, or any person who acts in any other capacity **at the order, request, or under the direction or control, of a foreign principal or of a person any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign principal;***

And who directly or through any other person:

- *represents the interests of such foreign principal before any agency or official of the Government of the United States*
- *engages within the United States in political activities for or in the interests of such foreign principal*
- *acts within the United States as a public relations counsel, publicity agent, information-service employee or political consultant for or in the interests of such foreign principal*
- *within the United States solicits, collects, disburses, or dispenses contributions, loans, money, or other things of value for or in the interest of such foreign principal*

*The statute defines **“political activities”** as any activity whose intent is to influence any **agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.***

POLITICAL INFLUENCE OPERATIONS:

CAIR has consistently acted in its role as a foreign agent to exert political influence upon agencies and officials of the United States government as well as law enforcement, the media, corporations, academia and other sections of the American public.

Elected Officials/Government Agencies/U.S. Policy:

CAIR has curried favor with elected officials, publicly censured and criticized government representatives who have expressed opposition to their OIC-inspired activities in the United States, and generally interfered in electoral politics and policy debates in the public discourse on behalf of foreign principals.

A [June 28, 2002 Semiannual Report](#) prepared for the CAIR Governmental Affairs Department encapsulates CAIR’s modus operandi in seeking to influence many areas of government policy:

Objective 1: Influence the formulation and execution of American domestic and international policy based on the concerns and values of the American Muslim community.

The first six months of 2002 saw a rise in the number of meetings and contact with government agencies and congressional offices. In January CAIR delivered testimony on racial profiling at a ‘rump’ hearing called by Rep. John Conyers, and meetings and calls to offices of members of the House Judiciary Committee on this and related issues. We continued to highlight the concerns about the treatment of detainees and their due process rights and the effect of ‘voluntary’ interviews on the American Muslim community and its relation with government officials.

During this period we met with Frank Boyd, head of the DOJ Civil Rights Department, and Frank Mueller, Director of the FBI and the Inspector General of the Office of Inspector General for DOJ, an independent auditing body that is currently investigating charges of mistreatment of detainees at the Passaic and Brooklyn INS detention centers. We also met with members of the DOT Transportation Security Agency to discuss the issues of watch lists and racial profiling of American Muslims. Finally, we met with the head of the Civil Rights Unit and other staff in the USDA to discuss denial of food stamp privileges among a number of Somali grocery stores...

We met with a number of congressional offices, especially in the senate, to discuss the Treasury Department raids on American Muslim homes, businesses and institutions. In these meetings we argued that the targets of the raids had not been afforded basic due process protections, especially the right to learn the nature of accusations and suspicions leveled against them. We tied these raids into the pattern of due process denial for detainees, interviewees, and the three Muslim charities whose assets have been frozen and asked for greater congressional oversight of Administration actions against the American Muslim community. On international issues, CAIR weighed in heavily regarding American policy in the Middle East, meeting with representatives of the State Department on a number of occasions and corresponding with State, the White House Office and Congressional offices to argue for a more balanced US policy in the Middle East. This contact increased during the major Israeli offensive in the West Bank. We also began to develop ties and resources to begin a major effort to highlight the threat of fundamentalist Hindu nationalism in India, especially in the state of Gujarat. We compiled information and began contacting congressional offices, especially senators of the Foreign Relations subcommittee on South Asian affairs.

Perhaps most troubling, [the report](#) notes CAIR’s efforts to undermine U.S. sanctions on Iran (See Case Study #2 below):

Finally, CAIR was approached by Conoco Oil about working together on the issue of sanctions against Iran. Discussions were formal until the introduction of the Syrian Accountability Act of 2002, when a joint interest in opposing these sanctions helped CAIR and Conoco to begin consulting more regularly on the status of this bill and efforts to defeat it. This bill is an AIPAC inspired resolution that is part of a strategy that aims to

keep Arab states off-balance and on the defensive, and thereby strengthen the position of Israel vis-a-vis the Palestinians.

Other CAIR political operations involving government officials and government policy include the following:

- On November 8, 2001 [CAIR denounced](#) what it called “an [Islamophobic smear campaign](#) against the American Muslim community and its leaders.” CAIR Communications Director Ibrahim Hooper warned “media professionals and elected officials” to back away from “the agenda of those who are making these false allegations” and asked people to “refrain from assisting anyone who would seek to silence the voice of an entire American religious minority”.
- On September 26, 2006 CAIR hosted their [4th Annual Congressional Iftar](#) (breaking of the Ramadan fast), attended by nine congressmen, dozens of staffers, military and law enforcement officials and community leaders. Nine local and international media outlets reported on the event and over 130 people were in attendance.
- On August 4, 2006 CAIR launched an online petition drive condemning Israeli military actions against Hezbollah entitled “[Not in America’s Name.](#)” CAIR asserted that American elected officials who rejected an immediate ceasefire were “out of step with the majority of Americans.”
- In late August 2006, CAIR hosted a panel discussion on “[The Israel Lobby and the U.S. Response to the War in Lebanon](#)” at the [National Press Club](#) in Washington, D.C. The panel consisted of CAIR Director Nihad Awad and Professors John Mearsheimer and Stephen Walt, authors of the controversial Harvard University study titled “The Israel Lobby.”
- CAIR hosted an August 16, 2006 panel discussion at the Longworth House Office Building entitled “[War in Lebanon and the War on Terror](#)” featuring Professor Bassam Haddad. Haddad attributed growing regional opposition to the U.S. to the “perceived American green light for Israeli aggression” and suggested that a U.S. attack on Iran “will have to be rethought.” Haddad stated that U.S. foreign policy in the Middle East has sought to “establish loyal and compliant regimes, not democratic regimes” and “what [America] wants to accomplish in the region has nothing to do with what the people of the region want.” Haddad argued that the “war on terror” would more appropriately be called the “war on the enemies of the U.S. government.”
- Seven (7) members of Congress spoke at [CAIR’s 12th Annual Banquet](#) on November 18, 2006 including: Rep. Elijah Cummings (D-MD), Rep. Keith Ellison (D-MN), Rep. Michael Honda (D-CA), Rep. Sheila Jackson Lee (D-TX) and Rep. Albert R. Wynn (D-MD). A total of twenty-three (23) members of Congress printed “Proclamations” (letters of congratulation and endorsement) in the 12th Annual Banquet program including: Rep. Lois Capps (D-CA), Rep. John Conyers, Jr. (D-MI), Rep. Elijah Cummings (D-MD), Rep. Keith Ellison (D-MN), Rep. Anna G. Eshoo (D-CA), Rep. Michael Honda (D-CA), Rep. Stephanie Tubbs Jones (D-OH), Rep. Dennis J. Kucinich (D-OH), Rep. Barbara Lee (D-CA), Rep. Sheila Jackson Lee (D-TX), Rep. Betty McCollum (D-MN), Rep. Gregory W. Meeks (D-NY), Rep. Barbara Mikulski (D-MD), Del. Eleanor Holmes Norton (D-DC), Rep. Bill Pascrell, Jr (D-NJ), Rep. C.A. Dutch Ruppersberger (D-MD), Rep. Loretta Sanchez (D-CA), Senator Paul Sarbanes (D-MD), Rep. Jan Schakowsky (D-IL), Rep.

Pete Stark (D-CA), Senator John Warner (R-VA), Rep. Maxine Waters (D-CA) and Rep. Albert R. Wynn (D-MD)

- A January 13, 2007 [“Strategy” document](#) outlined CAIR’s priorities through December 31, 2010 including the long term goals of impacting “local congressional districts with each chapter influencing at least two legislators through strong grass roots responses” and “influencing congressmen responsible for policy that directly impacts the American Muslim community. (For example congressmen on the judiciary, intelligence and homeland security committees.) We will develop national initiatives such as a lobby day and placing Muslim interns in Congressional offices.”
- In 2007 Nihad Awad, Khalid Iqbal, and Mohammed Nimer of CAIR helped to formulate an [“American Muslim Iraq Peace Initiative” \(AMIPI\)](#) which included plans to form an AMIPI Task Force “consisting of religious, civic and political leaders whose goal will be meet regularly and deliberate upon ways and means to influence both domestic policies and players in the region.” CAIR also committed to “contacting their Congressional contacts to join the AMIPI Press Conference.”
- Rep. Keith Ellison (D-MN) spoke at [CAIR’s 14th Annual Banquet](#) on November 23, 2008. A total of nine (9) members of Congress printed “Proclamations” (letters of congratulation and endorsement) in the 14th Annual Banquet program including: Rep. Lois Capps (D-CA), Rep. Tom Davis (D-CA), Rep. Keith Ellison (D-MN), Rep. Michael Honda (D-CA), Rep. Sheila Jackson Lee (D-TX), Rep. Betty McCollum (D-MN), Rep. James P. Moran (D-VA), Rep. Bill Pascrell, Jr (D-NJ) and Rep. Loretta Sanchez (D-CA).
- A total of four (4) members of Congress printed “Proclamations” (letters of congratulation and endorsement) in the program for [CAIR’s 15th Annual Banquet](#) on October 24, 2009 including: Rep. Gerald E. Connolly (D-VA), Rep. John Conyers (D-MI), Rep. Keith Ellison (D-MN) and Rep. Bill Pascrell, Jr (D-NJ).

Law Enforcement Agencies/Military:

CAIR has had extensive relationships with law enforcement agencies; especially the FBI but also local police departments, including numerous education and “sensitivity training” programs on dealing with the Muslim community.

- CAIR Executive Director Nihad Awad was among the Muslim leaders who [met](#) with FBI Director Robert Mueller on February 12, 2002. The leaders stressed the importance of “cultural sensitivity by law enforcement when interviewing or otherwise dealing with members of the Arab and Muslim communities” to Mr. Mueller.
- 2002 saw the case of U.S. Army Reserves nurse Captain Edwina (Tiger) McCall, in which she posted on an online bulletin board regarding possible responses to Islamic terrorism. Her career was ruined. [The entire case](#) deserves a quick read to understand CAIR’s ability to shape policy and intimidate personnel at that time at the Department of Defense. The “political correctness” of the military response in the McCall case was an early indicator of the DoD culture that would enable Major Nidal Hasan to murder 13 people and an unborn child, and wound over 30 others in Fort Hood six years later in 2009. Many similar cases involving CAIR are chronicled at various websites, particularly their own.

- Page 88 of the book [Muslim Mafia](#) details a September 2004 episode in which CAIR-Maryland’s civil rights director coached a mosque leader in Western Maryland not to cooperate with an FBI investigation of suspicious activity.
- Most recently published in 2005, [CAIR’s Law Enforcement Official’s Guide](#) attempts to limit the functions of law enforcement agencies in deference to Muslim sensibilities. The document advises that Muslims are “fully engaged” at their five daily prayer times and should not be expected to respond to law enforcement during these times. Municipal departments are advised never to schedule inspections or conduct other business with a mosque on Fridays between 10:00am and 3:00pm because this conflicts with required weekly congregational prayers. CAIR acknowledges that a Quran may be holding contraband and thus that an officer may have to touch a Quran, but proceed to pre-judge the culpability of Islamic ideology in any criminal action by insisting that officers handle the Quran with as much respect as possible to “demonstrate that they separate the actions of suspects from a holy scripture cherished by all Muslims.” CAIR advises the same deference be shown to prayer rugs. The guide goes on to recommend physical separation between Muslims and non-Muslims, warns law enforcement that Muslims of the opposite sex may avoid eye contact for “modesty reasons” and that canine officers should keep their distance because Muslims may feel great discomfort or fear around dogs. It also instructs officers that Muslim women home-alone should not be required to open the door and that officers should go to the trouble of removing their shoes when entering a Muslim house or other building. The guide suggests that bias in American law enforcement discourages Muslims from joining their ranks, and claims that federal agents have visited Muslims at home and work based on unsubstantiated reports.
- Muslim Afghan immigrant Sgt. Mohammad Weiss Rasool served as [CAIR’s liaison and advocate](#) within the Fairfax County (VA) Police Department. He arranged meetings between CAIR and Fairfax County’s police chief to complain about surveillance of mosques and demand Muslim sensitivity training for officers. In an email he was careful to warn CAIR leaders to refrain from deviating from their specific agenda so as not to raise tension between them and the police. He visited Executive Director Nihad Awad at CAIR headquarters several times between 2005 and 2008. Rasool breached the National Crime Information Center (NCIC) database at least 15 times to alert fellow Muslims who may have been under surveillance. In October 2007, Rasool was confronted by FBI agents for abusing his access to police databases. On April 22, 2008 Weiss Rasool was sentenced to two years supervised probation and a \$1,000 fine for his crimes.
- On June 26, 2006 CAIR hosted a Capitol Hill panel entitled [“Should the US Shut Down Gitmo”](#) during which two speakers outlined reasons for closing the Guantanamo Bay detention facility.
- At the [2006 CAIR Tampa Annual Banquet](#), FBI Tampa Special Agent in Charge Carl Whitehead spoke in praise of CAIR-Tampa and their Executive Director Ahmed Bedier.
- In a July 1, 2009 [online video](#) Attorney Melanie Elturk of CAIR-Michigan advised Muslims approached by extremist organizations such as Al-Qaeda to report the incident to their local mosque and CAIR first rather than the responsible law enforcement authorities.

In addition an [October 28-29, 2006 CAIR National Board Meeting Report](#) documents the following law enforcement-related influence operations carried out by CAIR in 2006:

- Met with Assistant Director in Charge Joe Persichini and Special Agent Jim McJunkin of the FBI.
- Sat on the FBI AMSA (Arab Muslim Sikh Advisory) Committee.
- Held a joint press conference with the FBI on the alleged plot to bomb airlines in U.K. and U.S.
- Met with the Fairfax police chief to discuss issues pertaining to Muslims and mutual cooperation.
- Filed an affidavit advocating the presence of a Muslim chaplain at Guantanamo Bay at the urging of former Gitmo Muslim chaplain James Yee.
- Intervened on behalf of four imams from Egypt and one imam from South Africa who were barred from entering the United States. They sent a letter to the Secretary of Homeland Security and the State Department requesting a meeting.

Media Figures/Corporations:

By means of lawsuits and threats of lawsuits, boycotts and threats of boycotts, letter-writing campaigns, and other tactics CAIR has chilled open debate in the media about Sharia-compliance. CAIR has intimidated authors, radio hosts and television hosts who speak out against their agenda. CAIR has also intimidated corporations who violate OIC-approved conduct regarding Muslim employees and customers.

- In 2003 CAIR MD [threatened legal action](#) against Bank of America for the treatment of Muslim employee Ms. Gul Naz Anwar. For restitution CAIR demanded among other things that Bank of America “institute CAIR’s Diversity/Sensitivity Training to all employees.” CAIR warned BOA that it had “resolved” a number of acts of discrimination and defamation with top American companies such as Nike, JC Penny, Sears, Burger King, Office Max, Office Depot, Delta Air Lines, Best Buy and Microsoft in the past. CAIR MD Executive Director Seyed Rizwan Mowlana later threatened a Muslim boycott of Bank of America if a meeting with all interested parties was not held by Thursday November 6, 2003. On October 28, 2003 Mowlana [solicited](#) the help of a foreign ambassador, Ashraf Jehangir Qazi of Pakistan, asking him to write a “strong letter” to Bank of America CEO Ken Lewis.
- A May 5, 2004 [article](#) by Michelle Malkin details CAIR’s intimidation tactics against American talk radio hosts including Jay Severin, Michael Graham, Paul Harvey and Dr. Laura Schlessinger.
- On December 5, 2006 CAIR National Legal Director Arsalan Iftikhar [wrote](#) the senior leadership of US Airways informing them that CAIR had been retained as legal counsel for the six “Flying Imams” who were ejected from a Minnesota flight after passengers reported suspicious behavior. He also asked for a formal meeting with US Airways executives and legal counsel in Arizona, the scheduled destination of the imams’ flight. Iftikhar notes that CAIR has “resolved” similar acts of discrimination and defamation involving Nike, the Los Angeles Times, JC Penney, Sears, Office Max, Office Depot and Delta Airlines.
- A document outlining [CAIR talking points](#) for a public controversy between CAIR and Senator Barbara Boxer contains the blueprints for intimidating a long list of media figures. Authors Daniel Pipes, Steven Emerson, Joe Kaufman, David Horowitz, Stephen

Schwartz and Andrew Whitehead are described as “staunchly pro-Zionist and anti-Muslim” individuals who “spew their bigoted conspiracy theories” and “create the bulk of anti-CAIR literature which is consumed and circulated by others.” The document says that some of their “lies and conspiracy theories seep through right wing AM and Cable TV radio talk shows” conducted by media figures such as Michael Savage, Michael Medved, Bill O’Reilly, Tucker Carlson and Glenn Beck. Planned actions include releasing negative “Who Is” sheets on David Horowitz, Joe Kaufman and Front Page Magazine (which is described as an “online hate site”).

- In a November 1, 2007 [press release](#), CAIR “called on radio listeners of all faiths to contact companies that advertise on Michael Savage’s nationally-syndicated radio program to express their concerns” regarding comments he had recently made about Muslims, with the stated goal of persuading those companies to stop advertising on the Savage Nation. On April 25, 2008 CAIR announced enthusiastically that many advertisers including Choice Hotels International, Sam’s Club, ITT Technical Institute, Chattem, Inc. (owners of Gold Bond, Icy Hot, and Selsun Blue), Union Bank of California, Intuit (parent company of TurboTax and QuickBooks), GEICO Insurance, US Cellular, Sprint Nextel, Sears, Universal Orlando Resorts, AutoZone, Citrix, TrustedID, JCPenney, OfficeMax, Wal-Mart, and AT&T had heeded their boycott call to date. The book [Muslim Mafia](#) documents that the campaign against Michael Savage cost CAIR \$160,000, and that Executive Director Nihad Awad estimated that it cost the Savage Nation “at least \$1 million in advertising revenue.” CAIR formed the non-profit group [Hate Hurts America](#) with its partners with the express purpose of opposing Savage. CAIR’s attacks against Savage remain on their website as of February 2010.

Media Campaigns/Academia:

CAIR has participated in various media campaigns to influence U.S. public opinion on behalf of foreign principals, most prominently the [5-year \\$50 million campaign](#) developed in the UAE in conjunction with the Al-Maktoum family and Hill and Knowlton in 2006:

- CAIR Chairman Omar Ahmad called it “the most ambitious public relations campaign anywhere in the world that the Muslims have thought about to change perceptions about Islam,” soliciting Arab businesses to make contributions towards the campaign. Ahmad continued “do not think about your contributions as donations. Think about it from the perspective of rate of return. The investment of \$50 million will give you billions of dollars in return for 50 years.”

Other CAIR media initiatives to influence public opinion and academic discourse include:

- In October 2001 CAIR Chairman Omar Ahmad said an important element of Saudi Arabia and other Gulf States’ strategy should be the mounting of an [aggressive public relations campaign](#) in the U.S. to counter “anti-Islamic and anti-Arab propaganda by Zionists.” Ahmad added that CAIR had placed 30 articles in the U.S. media explaining the Muslim community’s point of view.
- In November 2002 CAIR and the World Assembly of Muslim Youth (WAMY) announced a joint \$1.04 million [public relations campaign](#) in the form of a quarter-page

advertisement every Friday for 52 weeks in the *USA Today* newspaper. Executive Director Nihad Awad said CAIR was also planning the publication of advertisements in 10 other leading newspapers in America.

- Riyadh U.S. embassy staff reported in a [June 2006 State Department Memo](#) that one of the projects a visiting CAIR delegation discussed was “the presentation of ‘accurate books about Islam’ to schools and libraries in the U.S.”
- A January 13, 2007 [“Strategy” document](#) outlining CAIR’s priorities through December 31, 2010 included among its long-term goals that “In concert with local chapters we will sustain an ongoing media campaign to change hearts and minds of Americans... We will measure the effect of the media programs with the goal of significantly shifting public opinions:”
- The same [2007 document](#) identified midterm goals including tapping “into the ‘new media’ with contests for young potential film makers. We will launch an formal educational initiative. (We will look to educate 100 speakers, 50 writers, transform 50 Islamic centers to model outreach cultural centers, establish a scholarship for graduate students, publish points-of-reference material, initiate TV/radio shows, create deal presentations, a national forum and Amazon.com like source of all published material on Islam.)”

NOTE: This is an interim report and the political influence operations cited here are meant to be exemplary, not exhaustive. We will continue to add influence operations to the list, and we encourage readers to send us open-source documentation of activities similar to those presented here so we may deepen the evidence in our case.

Case Study #1: CAIR and The Islamophobia Campaign of the Organization of the Islamic Conference

It is beyond the scope of this memo to describe the seemingly endless conferences and global ambitions of the OIC, or even the extensive and well-financed activities of their [“Islamophobia Observatory.”](#) A book needs to be written analyzing the OIC’s Islamophobia campaign and its results. There are three key OIC websites. The [primary one](#) hosts the [“Ten Year Programme of Action,”](#) an important document to understand the OIC political goals. The other two OIC websites are directed at their U.N. activities; the [Permanent Observer website for OIC at UN offices in New York City](#) and the [Permanent Observer site for OIC at UN offices in Geneva and Vienna.](#)

The “Islamophobia” coinage was invented in the late 1990’s in the U.K., and is a continuation, using modern language, of traditional Shariah laws against defamation of Islam. At the primary OIC website, Islamophobia campaign resources include (in addition to the 10 year plan Article VII, and the framework for implementation), the Islamophobia Observatory, with Annual reports and monthly bulletins on “Islamophobic” statements and actions across the West.

The “Ten-Year Programme of Action To Meet the Challenges Facing the Muslim Ummah In the 21st Century” was submitted in 2005 to the 57 member states, and then approved in 2008. Article VII in that document states:

VII. Combating Islamophobia

1. Emphasize the responsibility of the international community, including all governments, to ensure respect for all religions and combat their defamation.
2. Affirm the need to counter Islamophobia, through the establishment of an observatory at the OIC General Secretariat to monitor all forms of Islamophobia, issue an annual report thereon, and ensure cooperation with the relevant Governmental and Non-Governmental Organizations (NGOs) in order to counter Islamophobia.
- 3. Endeavor to have the United Nations adopt an international resolution to counter Islamophobia, and call upon all States to enact laws to counter it, including deterrent punishments.**
4. Initiate a structured and sustained dialogue in order to project the true values of Islam and empower Muslim countries to help in the war against extremism and terrorism.”

We have emphasized the section in Article VII, item 3 – requiring laws to counter Islamophobia, including deterrent punishments – because that is, in a nutshell, the legislative and legal political agenda of the OIC for non-Muslim countries, and it defines their agenda as a foreign principal under FARA for foreign agents such as CAIR. The OIC has stated that [“Islamophobia” is the “worst form of terrorism” facing the world](#). In the [“Framework for the Implementation of the OIC Programme of Action”](#) (p. 17) the document states:

(23) POA I.7.3. Endeavor to have the United Nations adopt an international resolution to counter Islamophobia, and call upon all States to enact laws to counter it, including deterrent punishments. 47. Have an international resolution issued by the UN to combat Islamophobia. The Islamic Observatory at the OIC General Secretariat (Dawa Affairs Department). 53. H.E. the Secretary-General is making contacts to have an international resolution issued by the UN to counter Islamophobia (Medium term).

Page 18 of the [“Framework” document](#) notes among other planned actions, “55. The second symposium will be held in Washington in September 2006.” CAIR would become intimately involved in planning that conference (a joint venture between CAIR, the OIC and Georgetown University) in Washington D.C., although the conference would take place almost a year later than planned.

At the [CAIR National Board Meeting](#) on October 28-29, 2006 in Chicago, the OIC Islamophobia Conference was the first item on the agenda (*Note: The document refers to “Feb/March 06” but as the meeting report was written in October 2006 it is likely that the author intended to reference the following February and March of 2007*).

1-Islamophobia/OIC/Gtwn/CAIR conference

OIC agreed to fund the conference with up to \$300,000 to be held in Feb/March 06 [sic].

- a- Budget has to be adjusted by CAIR first, share it with GTWN, then submit it to OIC.
- b- Committees be formed:

1. A steering committee: a rep. of OIC, CAIR and GTWN
2. A program committee
3. A logistic committee

These plans were further elucidated in a [January 15, 2007 letter](#) from OIC Secretary General Ekmeleddin Ihsanoglu to CAIR Executive Director Nihad Awad and John Esposito of Georgetown University:

Dear Friends, I would like to extend my thanks for your letter of 11 January 2007 regarding the proposed conference to be organized at the Georgetown University in Washington, D.C. under our trilateral collaboration. I am pleased that after some serious considerations and exchange of ideas which took a while, now we are at a point of concretize our joint desire. This conference which will focus mainly on themes relevant to and various aspects of the phenomenon of Islamophobia, will be the first ever OIC sponsored event in the United States of America and comes at a most appropriate time when the issue is in the global agenda...

I am also pleased to inform you that the OIC General Secretariat will be contributing USD 325,000 for the organization of this conference. The total amount will be transferred to CAIR as soon as we are informed of the details of the relevant bank account...

From now on, we will be looking forward to the establishment of three joint committees, speedy finalization of the conference program and the themes of the panels, as well as the participant list. As for the speakers and general attendance from the OIC member states, the OIC General Secretariat will do its best for seeking commitment from some high level dignitaries and public figures. In this regard I believe that high level and wide attendance from (sic) the US, including the attendance of Secretary of State Dr. Rice will must (sic) probably facilitate attracting a high profile participation from the OIC member states. Ambassador Abdul Wahab and the OIC General Secretariat will be at your disposal to finalize the preparations of this landmark event.

However, this ambitious high-profile conference apparently never came to fruition. Instead a smaller [“Islamophobia and the Challenge of Pluralism”](#) workshop was finally held at Georgetown University on September 20, 2007. Note that the division of Georgetown hosting the event was the [Prince Alwaleed Bin Talal Center for Muslim-Christian Understanding](#) (Bin Talal is another prominent [CAIR donor](#) from Saudi Arabia). The following day, the OIC Secretary General gave a [keynote address](#) at Georgetown University, but CAIR was not mentioned. The OIC Secretary General did say, “To this end appropriate legislation should be enacted to prevent the dissemination of illegal, racist, xenophobic and Islamophobia material in the media.”

The pivotal event that occurred between the time that CAIR was in charge of the OIC's Islamophobia conference, and when they were essentially cut out from visible participation, was the [naming of CAIR](#) as an unindicted co-conspirator in the Holy Land Foundation trial.

CAIR has served as a foreign agent of the Jeddah, Saudi Arabia-based Organization of the Islamic Conference (OIC) since at least 1999 when they received "monetary contributions" from the OIC's international financial institution, the [Islamic Development Bank \(IDB\)](#):

- An August 15, 1999 [press release](#) from the Saudi Embassy announced that the IDB made a \$250,000 contribution toward the establishment of a CAIR-run education and research center in Washington, DC.
- On September 23, 2006 CAIR-Chicago and the OIC held a [joint press conference](#) on Islam/West relations at the Drake Hotel in Chicago. The conference addressed the Pope's "Islamophobic" comments of 11 days earlier in which he quoted a 14th century Byzantine Emperor's views on Islam; comments which were labeled a "smear campaign" by the OIC.
- In January 2007, Secretary General Ekmeleddin Ihsanoglu of the Organization of the Islamic conference promised to contribute [\\$325,000](#) to CAIR for the purpose of organizing the conference on Islamophobia at Georgetown University.
- On July 3, 2007 CAIR's Nihad Awad [attended a meeting](#) with OIC Secretary General Ekmeleddin Ihsanoglu in Jeddah. Awad told Arab News he was "pleased to meet with Ihsanoglu to discuss the situation of Muslims in the United States and to work on future projects."

And as noted above, a meeting in Washington DC between the OIC Secretary General and CAIR's leadership was summarized in the [Draft](#) (but not final) 1st Annual Report on Islamophobia:

2.9.3. Meeting with CAIR Officials

The Secretary General visited the headquarters of CAIR in Washington DC and held a meeting with the leadership of the Council. The meeting touched on ways and means to enhance cooperation and coordination on issues of mutual concerns. The Secretary General commended CAIR for upholding Islamic principles and its efforts in countering Islamophobia. In this regard the Executive Director of CAIR Dr. Nihad Awad briefed the Secretary General on the activities of CAIR in different fields. He stated that CAIR is providing training to the US government's agencies and departments including the State Department and the Department of Home Security Ministry. . He also briefed the Secretary General on the expansion plan of CAIR in terms of expanding its infrastructure and, programs in helping Muslim Communities in the US through its network across the US and Canada.. He emphasized the need for partnership with the OIC to counter the phenomenon of Isalmophobia [sic], in this connection; he stated the readiness of CAIR to extend all possible assistance to the OIC including sharing their report on Islmophobia [sic]. The Executive Director also gave an account on the journalist's Guide prepared by CAIR to understand Islam and Muslims. CAIR officials briefed the Secretary General on the issue related to the Holy land Foundation which had collected money for charity for

the Palestinians and accused of funding terror cells in Palestine in the name of Charity. They said that while they are expecting the accused to be exonerated of the charges, a guilty verdict might have serious implications for the Muslim Communities in America. The CAIR'S officials pointed finger at the Jewish organizations accusing them of building a theory that Muslim Americans are engaged in a conspiracy to overthrow the US constitution. He cited this false allegation as an act of Islamophobia.

CAIR's activities against "Islamophobia" have been extensive. In its role as a representative of the OIC in the U.S., CAIR has consistently used the theme of "Islamophobia" as a potent tool to condition (i.e. sensitize) the U.S. government, media, and public to the OIC's political agenda:

- CAIR held a conference on ["Islamophobia and Anti-Americanism"](#) from May 13-15, 2005 at the Sheraton Premiere in Vienna, VA, based on the assertion that Anti-Americanism is a direct result of "Islamophobia" in American foreign policy, media, and public discourse.
- Riyadh U.S. embassy staff reported in a [June 2006 State Department Memo](#) that a visiting CAIR delegation "presented various projects that CAIR is working on to counter negative stereotypes about Muslims in the U.S. ('Islamophobia'), linking their work to concern over growing anti-Americanism in the Middle East."
- On June 1, 2007 [Amana Publications published "Islamophobia and Anti-Americanism: Causes and Remedies."](#) a book based on the 2005 conference featuring "expert analysis and activist reflections" and edited by CAIR's Mohamed Nimer.
- CAIR's Philadelphia Chapter Chairman Iftekhhar Hussain described Islamophobia as ["a growing cancer in our nation today"](#) that must be removed from the public sphere. CAIR-PA held a [seminar on Islamophobia](#) in Philadelphia on November 4, 2007.
- On January 23, 2008 CAIR hosted an event called ["Fear for Votes: How Some 2008 Candidates are Exploiting Islamophobia"](#) at the National Press Club in Washington, DC.
- On [July 10, 2009 CAIR called on American](#) "opinion leaders, policymakers and law enforcement authorities" to speak out against Islamophobia while accusing the government of "sending agents provocateurs into mosques or targeting Muslims for deportation even after they are acquitted of criminal charges."

The OIC introduces resolutions against the defamation of religion annually at the United Nations. In 2009, a watered-down version of that resolution was introduced by the United States and Egypt as co-sponsors, and subject to widespread criticism by NGOs, and European and U.S. legal experts and legislators for its possible threat to freedom of speech. The resolution was described as follows (in a section detailing bilateral US-OIC discussions with Secretary Clinton) in the OIC Newsletter for October 7, 2009: "She [ie, Secretary Clinton] expressed satisfaction over the adoption of a joint US-OIC resolution concerning the freedom of expression at the UN Human Rights Council in Geneva. This resolution was jointly drafted by the American and Egyptian delegations." The strong version of the resolution (outlawing defamation, introducing deterrent punishments) was introduced at the U.N. subsequently, and for the first time, as a binding resolution, rather than a non-binding one. Based on the U.S. co-sponsorship (with either the OIC or Egypt) of the weaker resolution and the introduction of a binding version of the stronger resolution, the OIC's Islamophobia campaign, aided by CAIR's efforts as a foreign

agent, appears to be succeeding in achieving the goals set forth in the 10 Year Programme of Action.

Case Study #2: CAIR lobbies with Conoco, for Iran, against the Syrian Accountability Act of 2003

In March 1995 energy giant ConocoPhillips (through a Dutch subsidiary Conoco Iran, B.V.) signed a controversial \$1 billion deal to develop two Iranian oil fields. Though not technically illegal, the move was [opposed](#) by the Clinton administration and Sen. Alfonse D'Amato (R-NY) as “unhelpful” to U.S. policy which sought to “bring pressure to bear on Iran and get them to behave in the world community.” In the words of the Oklahoma Journal-Record, President Clinton dealt a [“death blow”](#) to the deal on March 15, 1995 when he announced he would issue an executive order to block it. Conoco was reportedly “happy the accord was dead” after a week of bad publicity. On May 8, 1995 President Clinton issued an [executive order](#) banning all U.S. trade with Iran. By November 1999 even Conoco Chief Executive Archie Dunham had reportedly [“resigned”](#) himself to the fact that U.S. Companies may have to wait until after President Clinton’s term finishes being able to invest in Iran’s oil development.

The Syria Accountability Act (SAA) was first [introduced](#) by Rep. Dick Armey (R-TX) in the form of H.R.4483 on April 18, 2002, with the goal of imposing economic and political sanctions until Syria ended support for terrorist groups, withdrew from Lebanon and complied with United Nations resolutions against Iraq. A Senate version (S.2215) was introduced the same day by Sen. Barbara Boxer (D-CA). On June 20, 2002 the Washington Post reported that President Bush [opposed](#) the bill “citing Syria’s cooperation” recently in the fight against Al Qaeda. On the same day CAIR sent out an [Action Alert email](#) urging “Muslims and other people of conscience to... contact their elected representatives in opposition to a new counterproductive bill being considered by Congress” with sanctions that would “harm Americans and Syrians.”

The primary evidence for CAIR’s FARA violations in this case is based on a single document, and no evidence of any financial transactions with Conoco was found in documents obtained from public sources. However, the description of the activity is explicit and the document is a straightforward report of government affairs activities for the year. The CAIR [Governmental Affairs Department report](#) released June 28, 2002 states:

CAIR was approached by Conoco Oil about working together on the issue of sanctions against Iran. Discussions were formal until the introduction of the Syrian Accountability Act of 2002, when a joint interest in opposing these sanctions helped CAIR and Conoco to begin consulting more regularly on the status of this bill and efforts to defeat it. This bill is an AIPAC inspired resolution that is part of a strategy that aims to keep Arab states off-balance and on the defensive, and thereby strengthen the position of Israel vis-a-vis the Palestinians.

An additional statement on the same page of that document describes further CAIR lobbying efforts on behalf of Syria and Palestine:

In the first three months of this year CAIR, AMC and MPAC governmental relations staff regularly met or spoke by phone about issues and priorities, in an effort to better coordinate the activities of these organizations. These meetings ended when Ray Busch left AMC and Mahdi Bray left MPAC. We plan to revive these conversations, but have not yet done so. I also frequently talked with Majed Jafari of AAI on lobbying issues, and we have coordinated our lobbying efforts on Palestine and Syria, shared information and consulted each other frequently. CAIR also organized three meetings of governmental relations staff from American Muslim and Arab organizations in order to share information and establish better working relationships between the organizations.

The House International Relations Subcommittee held hearings on the Syrian Accountability Act on September 18, 2002, the last major action on the 2002 version. In an [article](#) published on the day those hearings took place, Hiromi Hayashi of the National Iranian American Council (NIAC) wrote that “Some pundits believe that the Syria sanctions principal target is not Syria, but Iran.” Hayashi noted that “In his opening statement of the hearing, House Committee on International Relations Chairman Benjamin A. Gilman put Iran on notice, stating that ‘Working closely with Iran, Syria has facilitated the transfer of thousands of rockets and other weaponry to Hezbollah, boosting their arsenal and significantly improving their ability to carry out terror attacks against Israel.’” ConocoPhillips was a [founder](#) of NIAC, and CAIR and NIAC cooperate in lobbying against economic sanctions against Iran according to counterterrorism expert Clare Lopez.

In January 2003 officials who manage pensions for public employees in New York City [urged](#) shareholders of ConocoPhillips and other companies to pass resolutions requiring they disclose their contracts with Iran and Syria, saying such trade deals “violate the spirit of the law.” In a document entitled “Review and Report on Operations in Iran and Syria” ([PDF](#)) ([HTML](#)) Conoco shareholders requested that the Board of Directors “establish a committee of the Board to review ConocoPhillips’ operations in Iran and Syria,” and noted the following:

According to the U.S. State Department, the Iranian and Syrian governments have actively supported and funded terrorist operations against innocent civilians outside their own borders. These activities led to the imposition of government sanctions that provide that virtually all trade and investment activities by U.S. corporations with Iranian and Syrian government entities, are prohibited. ConocoPhillips’ use of its UK subsidiary to do business with state companies in Iran and Syria clearly violates the spirit of the law. It also exposes the company to the prospect of negative publicity, public protests, and a loss of consumer confidence, all of which can have a negative impact on shareholder value.

In 2001, the U.S. Securities and Exchange Commission stated that a company’s involvement with states that sponsor terrorism is a legitimate shareholder concern, that is “substantially likely to be significant to a reasonable investors decision about whether to invest in that company”. The New York City Police and Fire Department Pension Funds urge you to vote FOR this resolution.

ConocoPhillips [agreed](#) to review both Iranian and Syrian operations to avoid a potentially embarrassing shareholder vote. On April 4, 2003 ConocoPhillips [agreed](#) to a proposal by New

York City's comptroller to ensure oversight of its business in Iran and Syria, the third such promise it had made.

The Syria Accountability Act was reintroduced in the House as [H.R.1828](#) by Rep. Eliot Engel (D-NY) on April 12, 2003. The U.S. Senate [passed](#) the Syria Accountability Act (S.982) on November 11, 2003. The U.S. House [passed](#) the Senate version of the Syria Accountability Act on November 20, 2003. President Bush [signed](#) the bill into law on December 12, 2003.

Yet Conoco and its subsidiaries continued to transact business with Syria and Iran. In January 2004 CBS [reported](#) that ConocoPhillips still had a gas production business in Syria. Conoco told CBS they were "breaking no laws, and like Halliburton, make no apologies for their business dealings with states that sponsor terrorism." However, in the wake of the CBS report Conoco announced that "it will not accept any new business in any country that sponsors terrorism." ConocoPhillips [announced](#) it would wind down its Iranian ties in February 2004. On May 11, 2004 President Bush signed an Executive Order ([PDF](#)) implementing sanctions on Syria pursuant to the law.

CAIR's lobbying activities with Conoco on behalf of Syria and Iran in this case would appear to fit the legal definitions of FARA, requiring registration as a foreign agent.

Case Study #3: CAIR and the United Arab Emirates (UAE)

In 2006 CAIR acted as a foreign agent, as defined by FARA, when they solicited "contributions, money and things of value" from foreign principals Khalaf Al Habtoor and Hamdan bin Rashid Al Maktoum of Dubai. In exchange for the solicited [\\$50 million](#) and [endowment property](#), CAIR promised a return on investment in political influence and public relations in opposition to the specific policy position taken by Senator Charles Schumer and other congressional opponents of the controversial Dubai Ports decision. In February 2006 the Bush administration approved Dubai Ports World, a government-owned UAE corporation controlled by brothers Sheikh Mohammad bin Rashid Al Maktoum (Ruler of Dubai, UAE Prime Minister and Vice President) and Sheikh Hamdan bin Rashid Al Maktoum (Deputy Ruler of Dubai, UAE Finance Minister), to operate terminals at 22 U.S. seaports. In March 2006 the [House Appropriations Committee voted 62-2 to block the deal](#), reportedly damaging the reputation of the UAE and Arab/Muslim business interests in general.

CAIR reported the event as a victory, at least for CAIR. They proclaimed the following in their [2007 Civil Rights Report](#):

In February 2006, the Dubai Ports World controversy began and quickly rose to become one of the most widely-covered debates in American media and politics. At issue was the sale of a port management business to a company based in the United Arab Emirates (UAE), and whether such a sale would compromise America's national security. In addition to appearances on CNN and MSNBC, CAIR representatives were called on by national and international news networks to debate the issue. While politicians on both sides of the political aisle cited security concerns, CAIR officials were among the few voices to point out that in reality, bigotry and fear were driving the debates.

CAIR board chairman Parvez Ahmed offered the following commentary in an [op-ed](#) for the *San Francisco Chronicle*:

The recent hysteria surrounding the approval of a Dubai firm to manage parts of several American ports demonstrates how fear of Islam, or “Islamophobia,” can overpower rational discourse and harm our nation’s true interests....What would normally have been a routine business deal with a stable ally turned into a political fiasco that sent a “no Arabs or Muslims need apply” message to our partners in the Middle East and beyond....Indications of how politicians from both major parties were able to exploit the Dubai ports deal appear in two new polls on attitudes toward Islam. These troubling poll results should serve as a wake-up call for all Americans who value our nation’s traditions of religious tolerance and who seek to improve our sagging image in the Muslim world.

“What’s important to understand here is that all this is doing is demonizing the entire world Muslim population,” CAIR Spokesman Arsalan Iftikhar [complained](#) on MSNBC.

When CAIR listed their [top ten accomplishments for 2006](#), number two was “CAIR Influences Public Debate on Dubai Ports, Profiling.”

Within two months, Al Habtoor and Al Maktoum were assisting CAIR in fundraising, with the specifically and publicly stated purpose to act in the interest of UAE businesses as a foreign agent within the United States:

- In May 2006 construction mogul Khalaf Al Habtoor [hosted](#) a senior CAIR delegation in Dubai, including Executive Director Nihad Awad, Communications Director Ibrahim Hooper and Board Chairman Parvez Ahmed. As Ahmed solicited contributions from Al Habtoor and other wealthy UAE businessmen to fund a \$50 million U.S. public relations campaign, he [warned](#) that “If the image of Islam and Muslims is not repaired in America, Muslim and Arab business interests will continue to be on a downward slide in the US.” Ahmed [reassured](#) the donors, “Do not think about your contributions as donations. Think about it from the perspective of rate of return. The investment of \$50 million will give you billions of dollars in return for 50 years.”
- On May 21, 2006 the UAE’s official website announced that Minister of Finance Sheikh Hamdan bin Rashid Al Maktoum met with the CAIR delegation and [endorsed a proposal](#) to build an endowment property for CAIR in the United States. Executive Director Nihad Awad said that “the endowment will serve as a source of income and will further allow us to reinvigorate our media campaign.”

Over the next four months CAIR purchased two Washington, DC properties under the name of their holding company Greater Washington LLC. On July 11, 2006 they bought a \$500,000 property at [919 2nd St NE](#), and on September 7, 2006 they bought a \$410,000 property on the same square block at [208 Parker St NE](#).

In 2002 CAIR had received a previous “contribution of value” in real-estate from the Dubai-based Mohammad bin Rashid Al Maktoum Foundation:

- CAIR was released from prior mortgage obligations for its Washington, DC headquarters on September 12, 2002 when it signed a “deed of trust” with the state-run Al Maktoum Foundation of Dubai. The foundation [paid](#) “purchase money to the extent of \$978,031.34” for which CAIR granted the ruling Al Maktoum family the right to sell, manage, and/or collect rents from the property.

CAIR continues to use the property in question as its headquarters for lobbying operations.

Case Study #4: CAIR and Iran

CAIR annual fundraisers for [2006](#) and [2008](#) show a possible donation from the “Interests Section of Iran” which could be in violation of [31 CFR 535](#), the “Iranian Assets Control Regulations,” which forbid any transaction with Iran involving gifts, donations or a thing of financial value. See the “Thanks to” page from the [2006](#) and [2008](#) CAIR Annual fundraisers listing the Interests Section of Iran, and the [registration page for the 2009 CAIR Annual fundraiser](#) showing the cost of purchasing an embassy table. For more background see the article [“Has CAIR Violated the Iranian Assets Control Regulations?”](#)

Therefore, on November 6, 2009, the Center for Security Policy [sent a letter](#) to Mr. Adam J. Szubin, Deputy Assistant Secretary, Office of Foreign Assets Control, U.S. Department of the Treasury in which we suggested there is reasonable cause to believe the Council on American Islamic Relations violated the Iranian Assets Control Regulations in 2006 and 2008.

CAIR lobbies Congress, executive agencies and seeks to influence media and public opinion on behalf of Iran, by opposing economic sanctions, and by opposing any limits or criticism of the regime.

On September 8, 2006 national CAIR leaders including Executive Director Nihad Awad and Communications Director Ibrahim Hooper [welcomed](#) Former Iranian President Mohamed Khatami to a [gala private dinner](#) attended by 400 invited guests. As the [Khomeini regime’s Minister of Culture and Islamic Propagation](#) in 1984, Khatami presided over the creation of Iran’s terrorist proxy Hezbollah, and just one year into his term as president in 1998 his intelligence service brutally murdered opposition reform leaders Darioush and Parvaneh Forouhar of the Iran Nation’s Party. At that same 2006 CAIR dinner, Khatami was [served papers](#) for a legal suit by several Persian-Jewish families for the arrest and disappearance of twelve Persian Jews during his administration.

According to a 2009 [report](#) by intelligence and national security expert Claire Lopez, CAIR partners with the National Iranian American Council in opposing economic sanctions on the regime. In December 1997, CAIR condemned the Simon Wiesenthal Center Museum of Tolerance for a display that featured Adolf Hitler juxtaposed with the Ayatollah Khomeini. In March 1999, CAIR attacked an article by Elaine Sciolino that had appeared in the New York Times the previous month because the piece had criticized Iranian discrimination against women.

A [June 28, 2002 Semiannual Report](#) prepared for the CAIR Governmental Affairs Department explicitly states that CAIR engaged in lobbying against the sanctions on Iran, and that this activity increased when CAIR found common cause with the Conoco corporation in opposing the Syrian Accountability Act of 2002.

In addition, CAIR and Iran share a common interest in the support of Hamas, the parent organization of the Islamic Association of Palestine from which CAIR evolved in the early 1990's. Iran's support of Hamas is summarized in this [fact sheet](#) from The Israel Project. Since 1992, Hamas has received donations from Iran ranging from [\\$30 million \(PDF p.2\)](#) to [\\$120 million](#) annually, according to multiple sources. After western donations to Hamas were cut off in 2006, Iran reportedly donated [\\$250 million](#), and in May 2008, Khamenei reportedly increased immediate aid to [\\$150 million](#) in the second half of 2008.

CAIR continues to promote the cause of Hamas and oppose any and all efforts on behalf of Israel, with specific statements against Jews in the U.S. CAIR's political activities, lobbying and influence operations in opposition to Israel and indeed, against Jews, are summarized in this [fact sheet](#) from the Anti-Defamation League.

Conclusion

We argue that a strong case can be made that CAIR has been acting as a foreign agent for various foreign principals, conducting political activity on their behalf that has had a significant impact on U.S. domestic and foreign policies, for sums of money, loans and real property that are sizeable – in the millions over the last several years. As we noted in the beginning of this memorandum, whether one agrees or disagrees with CAIR's policies, and the policies of the foreign principles they represent, is irrelevant. What is relevant is that they have acted in the past and continue to act as a foreign agent for Saudi Arabia, the UAE and Iran, and arguably have also acted in the past for Kuwait and Syria in individual instances. We request that an investigation be pursued into the facts of CAIR's actions as a foreign agent, with appropriate actions taken if it is concluded that they indeed would be obligated under FARA to register.

For more information, contact the Center for Security Policy at 202-835-9077 or info@centerforsecuritypolicy.org.