

United States Senate
WASHINGTON, DC 20510

October 8, 2024

VIA ELECTRONIC TRANSMISSION

The Honorable Merrick Garland
Attorney General
Department of Justice

The Honorable Christopher A. Wray
Director
Federal Bureau of Investigation

Dear Attorney General Garland and Director Wray:

Ensuring compliance with the Foreign Agents Registration Act (FARA), and that FARA remains an active tool to combat foreign adversaries seeking to influence government and public opinion is of utmost importance.¹ FARA provides important transparency and accountability for the American people about foreign interests seeking to influence our political process and public opinion. FARA is a content-neutral law and does not require any entity or individual to refrain from certain types of speech or activities. Rather, it merely requires individuals to publicly disclose for whom they're working. It is incumbent upon all of us crack down on hidden foreign influence.²

¹ See 22 U.S.C. § 611 et seq.

² Press Release, *Grassley, Scott, and Colleagues Call out CCP-Backed Student Organizations for Work as Potential Foreign Agents*, (December 8, 2023) <https://www.grassley.senate.gov/news/news-releases/grassley-colleagues-callout-ccp-backed-student-organizations-for-work-as-potential-foreign-agents>, see letter from Senator Scott, Grassley, and Colleagues: <https://www.grassley.senate.gov/imo/media/doc/scott-grassley-et-al-to-doj-cssa-fara.pdf>; Press Release, *Grassley Presses DOJ on FARA and China's Activity in the U.S. Education System*, (Oct. 1, 2018) <https://www.grassley.senate.gov/news/news-releases/grassley-presses-doj-fara-and-china-s-activity-us-educationssystem>; Letter from Senator Charles E. Grassley to the Honorable Alejandro Majorkas, Secretary, Dep't of Homeland Security, (February 11, 2021), available at <https://www.grassley.senate.gov/news/news-releases/chinese-propaganda-outfits-at-us-schools-get-boost-from-biden-admin>. FARA oversight also includes letters to 74 universities and school districts with known active Confucius Institutes on campus. The letters urged each school to request a Federal Bureau of Investigation briefing to fully understand the academic research and national security threats posed by the Chinese government-backed organizations operating on campus. For a sample of the letters sent on March 10, 2020, see: <https://www.grassley.senate.gov/news/news-releases/grassley-schools-confucius-institutes-arefronts-chinese-propaganda-just-ask-fbi>. Press Release, Sen. Chuck Grassley, Ranking Member, S. Judiciary Comm., *Senators Push DOJ on FARA Compliance of Brookings Institution* (Aug. 6, 2022), <https://www.grassley.senate.gov/news/news-releases/senators-push-doj-on-fara-compliance-of-brookingsinstitution>; Letter from Sen. Chuck Grassley, Chairman, S. Judiciary Comm., to Dana Boente, Acting Deputy Attorney General (April 6, 2017), [https://www.grassley.senate.gov/imo/media/doc/2017-04-06%20CEG%20to%20DOJ%20\(Manafort%20Podesta%20FARA\).pdf](https://www.grassley.senate.gov/imo/media/doc/2017-04-06%20CEG%20to%20DOJ%20(Manafort%20Podesta%20FARA).pdf); Press Release, Sen. Chuck Grassley, Chairman, Senate Finance Committee, *Lawmakers Seek FARA Evaluation Of Qatari-Owned Al Jazeera* (June 19, 2019), <https://www.grassley.senate.gov/news/news-releases/lawmakers-seek-fara-evaluation-qatari-owned-aljazeera>; Press Release, Sen. Chuck Grassley, *Grassley, Johnson to DOJ: Did Burisma's U.S. Lobbying Firm File Misleading Information on Foreign Agent Form?* (May 25, 2022), <https://www.grassley.senate.gov/news/newsreleases/grassley-johnson-to-doj-did-burismas-us-lobbying-firm-file>

Today, we write to express serious concern about potential foreign-aligned influence on U.S. college campuses by the National Students for Justice in Palestine (NSJP), which claims to support hundreds of Palestine solidarity organizations, including Students for Justice in Palestine (SJP) chapters at our nation's colleges and universities.³ Following the brutal terrorist attacks of October 7, 2023, on Israel by Hamas, NSJP's Instagram account "celebrated the weekend attacks: '[t]oday, we witness a historic win for the Palestinian resistance: across land, air, and sea.'"⁴ Several dozen SJP chapters across the U.S. voiced their support for the attacks, and some claimed they are part of a liberation movement.⁵ For example, at the time, the Tufts University SJP chapter sent a message to its e-list "praising the 'creativity' of the Hamas-led surprise attacks on Israeli civilians," a message which was denounced by the university's president.⁶ At the end of the Spring 2024 semester, violent criminal activity erupted on campuses across the country, whose participants include students reportedly supported by NSJP and SJP Chapters.⁷ The violence effectively shut down college campuses and chased Jewish students away from their schools for the remainder of the semester.⁸ Public reporting and lawsuits suggest that NSJP, and affiliated college groups including SJP chapters acting under their leadership, have taken actions to shape U.S. policy and public opinion in favor of Hamas.⁹

[misleading-information-on-foreign-agentform](#).; Press Release, Sen. Chuck Grassley, *Grassley Questions DOJ on Biden Family FARA Compliance Stemming from Business Deals with Chinese Communist-Backed Energy Tycoons* (Nov. 11, 2020), <https://www.grassley.senate.gov/news/news-releases/grassley-questions-doj-biden-family-fara-compliancestemming-business-deals>; Letter from Senator Ernst and Colleagues to IRS regarding NSJP and related groups on tax exempt status (May 9, 2024)

https://www.ernst.senate.gov/imo/media/doc/2024_05_09_letter_to_irs.pdf; Letter from Senator Ernst and Colleagues to IRS regarding May 9, 2024 Letter Response (Aug. 22, 2024)

https://www.ernst.senate.gov/imo/media/doc/letter_from_senernstetaltocommissionerwerfel.pdf.

³ National Students for Justice in Palestine. <https://www.nationalsjp.org/>.

⁴ Jack Stripling and Laura Meckler, *The Washington Post*. At Colleges, Violence in Israel and Gaza Ignites a War of Words. (Last updated: October 11, 2023). See: <https://www.washingtonpost.com/education/2023/10/10/colleges-react-israel-hamas-war/>.

⁵ Landon Mion. *Fox News*. Dozens of Pro-Palestinian University Student Chapters Celebrate Attack on Israel: 'Not Unprovoked'. (October 11, 2023). See: <https://www.foxnews.com/us/dozens-pro-palestinian-university-student-chapters-celebrate-attack-israel-not-unprovoked>.

⁶ Daniel Vos, *The Tufts Daily*. *University Denounces SJP Praise of Hamas Led Attacks*. (October 12, 2023). See: <https://www.tuftsdaily.com/article/2023/10/university-denounces-sjp-praise-of-hamas-led-attacks>.

⁷ Reuters. *Explainer: What is behind the pro-Palestinian protests at US universities?* May 3, 2024.

<https://www.reuters.com/world/us/what-is-behind-pro-palestinian-protests-us-universities-2024-05-03/>.; Mimi Montgomery and Cuneyt Dil, *AXIOS D.C. D.C. College Students Gather to Protest the War in Gaza*. April 25, 2024. <https://www.axios.com/local/washington-dc/2024/04/25/gw-protest-campus-gaza>.

⁸ Erin Ailworth, Alyssa Lukpat, and Joseph Pisani. *The Wall Street Journal*. *Hundreds of Protesters Arrested as Universities Blame Outsiders for Escalating Violence*. Updated May 1, 2024. <https://www.wsj.com/us-news/education/columbia-ucla-college-protests-police-25418aa5>; Sarah Fortinsky. *The Hill*. *Columbia University classes moved online after rabbi says Jewish students should 'return home'* (April 22, 2024)

<https://thehill.com/homenews/state-watch/4610826-columbia-university-classes-moved-online-rabbi-says-students-should-return-home/>.; Sharon Otterman and Santul Nerkar. *New York Times*. *As Protests Grow, Universities Choose Different Ways to End Unrest*. <https://www.nytimes.com/2024/05/01/nyregion/college-protests-divestment-columbia-brown.html> (May 1, 2024).

⁹ Commonwealth of Virginia Office of the Attorney General, *Attorney General Miyares Leads Amicus Brief Supporting Victims of Hamas Terrorism* (Sept. 23, 2024). <https://www.oag.state.va.us/media-center/news-releases/2781-september-23-2024-attorney-general-miyares-leads-amicus-brief-supporting-victims-of-hamas-terrorism>.

Based on publicly available information, NSJP is working to ensure students continue their activities through the fall semester. In fact, it launched a “National SJP Summer School” building on the group and its affiliates’ activities in the spring. As NSJP wrote:

[i]n the aftermath of the most impactful years of Palestine student organizing in decades, National Students for Justice in Palestine invites student organizers and movement partners to deepen our understanding of our current political moment and develop our organizational and leadership skills, with the aim of entrenching the frameworks necessary to sustain and grow the Student Intifada in the coming academic year. Who is the Revolution? We are the Revolution.¹⁰

There are many examples of SJP chapters that promoted this “online retreat” on behalf of NSJP and campuses even developed their own versions, with their own curricula.¹¹

NSJP claims it supports over 350 SJP chapters, and similar chapters across North America.¹² This amounts to a significant network of students across the United States.

According to NSJP, it “aim[s] to develop a student movement that is connected, disciplined, and equipped” with tools toward fulfilling their mission.¹³ NSJP’s website states it will

facilitate the SJP National Network. ... This facilitation will include maintaining communication networks, coordinating campaigns, carrying out political education, leading training, and building an organizing community.”¹⁴ NSJP further states it “aim[s] to ... [c]ultivate deep relationships with our allies and engage in joint struggle with national and international partners.¹⁵

¹⁰ National SJP Instagram Account. See post dated June 12, 2024. <https://www.instagram.com/nationalsjp/?hl=en>.

¹¹ NENJP. New England Network for Justice in Palestine. NATIONAL SJP SUMMER SCHOOL - INVITATION TO STUDENT ORGANIZERS TO JOIN THIS ONLINE RETREAT - REGISTRATION DEADLINE JUNE 24 (NATIONAL SJP). <https://www.nenjp.org/calendar/2024/6/16/national-sjp-summer-school-invitation-to-student-organizers-to-join-this-online-retreat-registration-deadline-june-24-national-sjp-m8n23>.

¹² National Students for Justice in Palestine. <https://nationalsjp.org/>. National SJP Instagram Account. The account bio states “Official account of National Students for Justice in Palestine, a grassroots organization supporting over 300+ SJP chapters.” See: <https://www.instagram.com/nationalsjp/?hl=en>; ADL. Anti-Israel Summer “Schools” Emerge Nationwide. (Published 6/28/24 – Updated 7/1/24). <https://www.adl.org/resources/blog/anti-israel-summer-schools-emerge-nationwide>.

¹³ Their website states that NSJP’s Campus Support Coalition can offer support to student groups whether they are just starting a chapter and need resources, are facing campus backlash, or need campaign materials. National Students for Justice in Palestine. <https://nationalsjp.org/> also see Campus Support Coalition page. <https://nationalsjp.org/support>.

¹⁴ NSJP. Website, Who Are We? <https://nationalsjp.org/about>.

¹⁵ *Id.*

In October 2023, NSJP provided SJP chapters with a toolkit urging them to participate in a day of resistance across college campuses.¹⁶ It is further reported that the toolkit stated, “Resistance comes in all forms – armed struggle, general strikes, and popular demonstrations...[a]ll of it is legitimate, and all of it is necessary.”¹⁷ On April 19, 2024, “the national chapter of Students for Justice in Palestine called on all chapters to follow Columbia SJP’s lead and pressure their administrations to divest from Israel.”¹⁸ This call sparked student protests on campuses across the United States.¹⁹ On April 20, 2024, NSJP announced “a coordinated pressure campaign against university administrations and trustees to immediately divest from the [I]sraeli state,” and claimed to be united in a mission including “a university divorced from the fundamentally immoral economic and political system of the [U]nited [S]tates.”²⁰ NSJP’s website further promotes the Boycott, Divestment, and Sanctions (BDS) against Israel movement by specifically highlighting universities’ divestment from Israel.²¹

The situation at Columbia University resulted in widespread illegal activity. At the request of the University, on April 30, 2024, there were approximately 300 arrests on two Columbia campuses on April 30, 2024.²² Columbia University’s main campus shifted to hybrid learning for the remainder of the semester amid the ongoing protests and antisemitic threats.²³ Its university-wide Commencement ceremonies were canceled.²⁴ Columbia University’s rabbi, Rabbi Buechler, urged the university’s Jewish students to go home and remain home, saying “I would strongly urge [Jewish students] return home as soon as possible and remain home until the reality in and around campus has dramatically improved. ... Columbia University’s Public Safety and the NYPD cannot guarantee Jewish students’ safety in the face of extreme

¹⁶ Landon Mion. Fox News. *Dozens of Pro-Palestinian University Student Chapters Celebrate Attack on Israel: ‘Not Unprovoked’*. (October 11, 2023). See: <https://www.foxnews.com/us/dozens-pro-palestinian-university-student-chapters-celebrate-attack-israel-not-unprovoked>.

¹⁷ Salvador Rizzo. The Washington Post. *Survivors of Oct. 7 attack sue pro-Palestinian groups in U.S.: They allege that American Muslims for Palestine and National Students for Justice in Palestine spread terrorist propaganda from Hamas at U.S. colleges*. Updated May 2, 2024. <https://www.washingtonpost.com/dc-md-va/2024/05/02/lawsuit-students-palestinian-protests-hamas/>.

¹⁸ Information from a NSJP Instagram Isha Banerjee, Apurva Chakravarthy, Joseph Zuloaga, and Manuela Silva. Columbia Spectator. Updated April 21, 2024. <https://www.columbiaspectator.com/news/2024/04/21/pro-palestinian-organizations-at-universities-across-the-world-protest-in-support-of-columbia-gaza-solidarity-encampment/>.

¹⁹ Kiara Alfonseca and Max Zahn. ABC News. *Campus protesters are demanding universities divest from Israel. Here’s what that means*. May 3, 2024. <https://abcnews.go.com/US/campus-protesters-demanding-universities-divest-israel-means/story?id=109788184>.

²⁰ Open Letter from Students for Justice in Palestine to Universities. <https://nationalsjp.org/popular-university-for-gaza-open-letter>. (April 20, 2024).

²¹ National SJP. Recent Campus BDS Victories. See: <https://nationalsjp.org/bds-victories>.; Open Letter from Students for Justice in Palestine to Universities. <https://nationalsjp.org/popular-university-for-gaza-open-letter>. (April 20, 2024).

²² Ayana Archie. NPR. *New York police arrest 300 people as they clear Hamilton Hall at Columbia University*. May 1, 2024. <https://www.npr.org/2024/05/01/1248401802/columbia-university-protests-new-york>.

²³ Miranda Nazzaro. The Hill. *Columbia says classes will be hybrid until semester ends amid protests*. <https://thehill.com/homenews/education/4614798-columbia-hybrid-classes-protests-israel-palestine/>.

²⁴ Emily Forgash. Columbia Spectator. *Columbia Commencement ceremonies canceled, school Class Days moved off campus*. (May 6, 2024) <https://www.columbiaspectator.com/news/2024/05/06/columbia-commencement-ceremonies-canceled-school-class-days-moved-off-campus/>.

antisemitism and anarchy.”²⁵ As a general proposition, while protestors have the right to express themselves in a peaceful manner, violence and antisemitism is unacceptable.

In the fall of 2023, NSJP launched an initiative called “The Written Resistance” as a newsletter “directly serving the student movement,” that is publicly available on NSJP’s website, mailed to SJP chapters worldwide, and available to individuals for an annual subscription.²⁶ The third issue, released in April 2024, includes a link to a toolkit and a petition requesting support for a campaign urging stores to remove products that support Israel from their shelves.²⁷ The Letter from the Editors states,

[o]ur people remain firm and resolute in pursuing the liberation of our homeland...we must meet this moment with strength, courage, and revolutionary commitment; the struggle for liberation against Zionism and US imperialism requires it...we will continue to dismantle the Zionist Project and the US Empire from within. Glory to the martyrs. Until liberation, Editorial Board – National Students for Justice in Palestine.²⁸

The Letter from the Editor in the fourth issue released in July 2024 states:

Our unity now is paramount; this is not the time to slow down or lose focus. In our tens of thousands across the nation and the world, we must merge our efforts, strengthen our organizations, and return this fall as a united student movement ready to challenge any institution, administration, or Zionist sympathizer that stands in our way. The Student Intifada has just begun; we will not stop until our demands are met. Long live the Student Intifada. Glory to our martyrs. Until liberation.²⁹

Overall, these actions show partnership and influence between the chapters and the National level organization, and a clear desire to effectuate political ends, including impacting public opinion. You are both aware that is part of a FARA analysis. Notably, FARA defines a “publicity agent” as:

any person who engages directly or indirectly in the publication or dissemination of oral, visual, graphic, written, or pictorial information or matter of any kind, including publication by means

²⁵ Amanda Geffner, Fox5 New York, *Columbia University Rabbi Urges Jewish Students to Go Home Amid Protests*. (April 21, 2024). <https://www.fox5ny.com/news/columbia-university-rabbi-sends-letter-to-students-antisemitism>.

²⁶ NSJP. The Written Resistance. Established 2023. <https://nationalsjp.org/twr>

²⁷ NSJP. The Written Resistance. Issue 0003. April, 2024. Page 3. <https://nationalsjp.org/twr>.

²⁸ NSJP. The Written Resistance. Issue 0003. April, 2024. Page 1. <https://nationalsjp.org/twr>.

²⁹ NSJP. The Written Resistance. Issue 0004. July, 2024. Page 1. <https://drive.google.com/file/d/1TBJol1xuBX73WIFpom0Acm5pgOOpLHTn/view>.

of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or otherwise...³⁰

Moreover, allegations and reporting suggest there are links between one of NSJP's key supporters and Hamas, which is a foreign principal as defined by FARA. Reporting generally states that NSJP was founded between 2001-2006 with support from the American Muslims for Palestine (AMP).³¹ AMP was reportedly founded in 2005 by the former leaders of three organizations: KindHearts, the Islamic Association for Palestine (IAP), and the Holy Land Foundation for Relief and Development (HLF).³² All three organizations were implicated by the U.S. government between 2001 and 2011 for financing Hamas.³³ It has been previously reported that "AMP is arguably the most important sponsor and organizer for Students for Justice in Palestine (SJP)."³⁴ As described below, it's been alleged that AMP shares leadership, connection, and resources with terrorist-linked organizations. This raises questions as to whether through its public and private efforts, NSJP, and/or its chapters are wittingly or unwittingly supporting a foreign principal to impact public opinion with "political activities," as defined by FARA, and/or as a publicity agent.³⁵ There are various allegations of links between these organizations and AMP including:

- IAP served as "the main propaganda arm for Hamas in the United States until it was dissolved in 2004."³⁶

³⁰ 22 U.S.C. § 611(h).

³¹ According to the Anti-Defamation League "The organizational history and structure of SJP is complex. The first chapter of Students for Justice in Palestine was founded at the University of California, Berkeley, in 2001. Additional chapters formed, but they did not come under a single umbrella until 2006 with the creation of the short-lived Palestine Solidarity Movement (PSM), which was itself created by ... AMP." see: Anti-Defamation League. Background: Students for Justice in Palestine (SJP). (October 19, 2023). see: <https://www.adl.org/resources/backgrounder/students-justice-palestine-sjp>. Also see: Dan Diker and Jamie Berk. Jerusalem Center for Public Affairs. *Students for Justice in Palestine Unmasked: Terror Links, Violence, Bigotry, and Intimidation on US Campuses*. June 15, 2018. See: <https://jcpa.org/book/students-for-justice-in-palestine-unmasked/>.

³² Dan Diker with Jamie Berk. Jerusalem Center for Public Affairs. *Students for Justice in Palestine Unmasked. 2017*. https://jcpa.org/wp-content/uploads/2017/11/SJP_Unmasked_Final_edited.pdf.

³³ *Id.* For information on KindHearts and the HLF, see: Statement by Stuart Levey, who at the time was the Treasury Under Secretary for Terrorism and Financial Intelligence. U.S. Department of the Treasury. Press Release: Treasury Freezes Assets of Organization Tied to Hamas. <https://home.treasury.gov/news/press-releases/js4058>.

³⁴ Testimony of Jonathan Schanzer, Vice President of Research, Foundation for Defense of Democracies. Israel Imperiled: Threats to the Jewish State. Joint Hearing before House Foreign Affairs Committee Subcommittee on Terrorism, Nonproliferation, and Trade and the Subcommittee on the Middle East and North Africa. Washington, DC April 19, 2016. <https://docs.house.gov/meetings/FA/FA18/20160419/104817/HHRG-114-FA18-Wstate-SchanzerJ-20160419.pdf?ref=stanfordreview.org>.

³⁵ 22 U.S.C. § 611(h), 22 U.S.C. § 611(o). Notably, the exemption for activities in furtherance of "bona fide religious, scholastic, academic, or scientific pursuits, or of the fine arts" is not available where the person or entity engages in political activities for or in the interests of his foreign principal. 22 U.S.C. § 613(e); 28 C.F.R. § 5.304. see: <https://www.justice.gov/nsd-fara/frequently-asked-questions#:~:text=The%20exemption%20for%20activities%20in,interests%20of%20his%20foreign%20principal>.

³⁶ Anti-Defamation League. Profile: American Muslims for Palestine. (2013). See: <https://www.adl.org/sites/default/files/documents/assets/pdf/israel-international/israel--middle-east/american-muslims-for-palestine-2013-03-29-v4.pdf>. Also see: Islamist Watch – Middle East Forum. Islamist Money In Politics. <https://www.meforum.org/islamist-watch/money-politics/>.

- A DOJ release states “[f]rom its inception, HLF existed to support Hamas... HLF was designated as a Specially Designated Terrorist by the Treasury Department and shut down in December 2001.”³⁷
- The Treasury Department had previously stated, “KindHearts is the progeny of Holy Land Foundation and Global Relief Foundation, which attempted to mask their support for terrorism behind the fa[c]ade of charitable giving,” and froze the entities’ assets.³⁸ Treasury further stated that “KindHearts officials and fundraisers have coordinated with Hamas leaders and made contributions to Hamas-affiliated organizations.”³⁹
- In late 2023, the Virginia Attorney General’s Office announced that an investigation is underway into AMP.⁴⁰ Specifically, the investigation is looking into whether AJP Educational Foundation, Inc., also known as American Muslims for Palestine, violated Virginia’s charitable solicitation laws.⁴¹ The AG’s office stated that it has reason to believe that the Northern Virginia-based AMP may not be complying with state rules on charitable giving and will investigate allegations lodged in a federal civil suit that the group provides indirect support to Hamas.⁴²
- On September 20, 2024, the Attorney General of Virginia’s Office issued a press release about a federal lawsuit saying “[t]he lawsuit seeks to hold AJP Educational Foundation Inc. (also known as American Muslims for Palestine (AMP)) and the National Students

³⁷ Department of Justice Office of Public Affairs. Federal Judge Hands Down Sentences in Holy Land Foundation Case. May 27, 2009. <https://www.justice.gov/opa/pr/federal-judge-hands-down-sentences-holy-land-foundation-case#:~:text=Today%2C%20in%20federal%20court%20in,a%20designated%20foreign%20terrorist%20organization.>

³⁸ Statement by Stuart Levey, who at the time was the Treasury Under Secretary for Terrorism and Financial Intelligence. U.S. Department of the Treasury. Press Release. U.S. Department of the Treasury. Treasury Freezes Assets of Organization Tied to Hamas. February 19, 2006. <https://home.treasury.gov/news/press-releases/js4058>.

³⁹ Press Release. U.S. Department of the Treasury. Treasury Freezes Assets of Organization Tied to Hamas. February 19, 2006. <https://home.treasury.gov/news/press-releases/js4058>.

⁴⁰ VA Office of the Attorney General. News Releases. Attorney General's Office Opens Investigation Into American Muslims for Palestine Nonprofit. October 31, 2023. See: <https://www.oag.state.va.us/media-center/news-releases/2630-october-31-2023-attorney-generals-office-opens-investigation-into-american-muslims-for-palestine-nonprofit>.; Also see: VA Office of the Attorney General. News Releases. Virginia Court Orders American Muslims for Palestine to Produce Records Requested by Attorney General Miyares (July 16, 2024) See: <https://www.oag.state.va.us/media-center/news-releases/2758-july-16-2024-virginia-court-orders-american-muslims-for-palestine-to-produce-records-requested-by-attorney-general-miyares>.

⁴¹ *Id.*

⁴² VA Office of the Attorney General. News Releases. Attorney General's Office Opens Investigation Into American Muslims for Palestine Nonprofit (October 31, 2023) See: <https://www.oag.state.va.us/media-center/news-releases/2630-october-31-2023-attorney-generals-office-opens-investigation-into-american-muslims-for-palestine-nonprofit>.; Justin Jouvenal. The Washington Post. Va. AG will prove fundraising of pro-Palestinian group. October 31, 2023. <https://www.washingtonpost.com/dc-md-va/2023/10/31/miyares-investigates-palestinian-group/>.

for Justice in Palestine (NSJP) accountable for allegedly providing material support to Hamas, a designated foreign terrorist organization.”⁴³

- In support of the lawsuit, the Attorneys General of Iowa and Virginia filed an amicus brief stating that “[a]s alleged, AMP and NSJP did not begin their material support for Hamas on October 8, 2023; rather, their material support had been going on for decades—both as the current organizations and through predecessor entities. Specifically, AMP was founded after a predecessor organization and five of its board members were convicted of providing material support for Hamas...AMP in turn founded NSJP, which disseminates pro-Hamas propaganda on college campuses throughout the country...and both AMP and NSJP have supported Hamas generally and specifically as to the October 7 massacre in Israel... Without Defendants’ support of ‘knowingly serving as the propaganda and recruiting wing of a Foreign Terrorist Organization in the United States’ ... Hamas’s goals would be unachievable.”⁴⁴
- It has been reported that “[t]he funds distributed to individual SJP chapters and National Students for Justice in Palestine through AMP and its fiscal sponsor Americans for Justice in Palestine Educational Foundation were reported to be at least \$100,000 for 2014.”⁴⁵ More recently, it has been reported that WESPAC Foundation, a White Plains, New York-based organization that serves as the fiscal sponsor for NSJP, is linked to Hamas.⁴⁶

Past reporting alleges SJP campus chapters are encouraged to reach out to AMP to trade strategies and get non-students to attend student government meetings about divestment from Israel.⁴⁷

⁴³ VA Office of the Attorney General. News Release. Attorney General Miyares Leads Amicus Brief Supporting Victims of Hamas Terrorism. September 23, 2024. <https://www.oag.state.va.us/media-center/news-releases/2781-september-23-2024-attorney-general-miyares-leads-amicus-brief-supporting-victims-of-hamas-terrorism>.

⁴⁴ *Id* (see page 3).

⁴⁵ Dan Diker and Jamie Berk. Jerusalem Center for Public Affairs. Students for Justice in Palestine Unmasked. 2018. https://jcpa.org/wp-content/uploads/pdf/SJP_unmasked_2018_web.pdf. Document page 36.

⁴⁶ Anti-Defamation League. WESPAC (Westchester Peace Action Committee). Updated 5/29/24. <https://www.adl.org/resources/blog/wespac-westchester-peace-action-committee>.; The Institute for the Study of Global Antisemitism & Policy. New Comprehensive Research Reveals Hamas-Linked Funding to Students for Justice in Palestine and Groups Growing Web of Influence Post October 7. May 3, 2024.

<https://isgap.org/post/2024/05/for-immediate-release-new-comprehensive-research-reveals-hamas-linked-funding-to-students-for-justice-in-palestine-and-groups-growing-web-of-influence-post-october-7/>.

⁴⁷ Max Samarov. Forward. Students for Justice in Palestine Relies on a Network of Hate. <https://forward.com/community/393199/students-for-justice-in-palestine-relies-on-a-network-of-hate/>.

Moreover, it is impossible to ignore that Iran directly provides support to Hamas, further building on foreign actors' potential indirect or direct influence over NSJP and its chapters.⁴⁸ On July 9, 2024, Director of National Intelligence Avril Haines issued a statement:

[i]n recent weeks, Iranian government actors have sought to opportunistically take advantage of ongoing protests regarding the war in Gaza, using a playbook we've seen other actors use over the years. We have observed actors tied to Iran's government posing as activists online, seeking to encourage protests, and even providing financial support to protesters ... Furthermore, Americans who are being targeted by this Iranian campaign may not be aware that they are interacting with or receiving support from a foreign government. We urge all Americans to remain vigilant as they engage online with accounts and actors they do not personally know."⁴⁹

These reported links pose serious questions and concerns regarding whether—and to what extent—Hamas and Iran have infiltrated U.S. college campuses across the United States. The introduction of hostile foreign adversaries into domestic political discussion is especially of issue when it is fueling an alarming rise in antisemitism and anti-Israel sentiment. The public reporting appears to indicate that NSJP and related chapters may fit into the FARA definition of “publicity agent,” at minimum, and its conduct, among other activity, may constitute a public relations effort designed to impact U.S. public opinion in favor of a foreign principal, which would meet FARA's definition of political activities.⁵⁰

Taken as a whole, these actions require further investigation from DOJ and the FBI to fully determine whether NSJP and SJP chapters should register as foreign agents under FARA and the extent of Hamas and Iran's potential involvement.⁵¹ Please respond to the following questions no later than October 22, 2024:

1. What actions, if any, has DOJ taken to assess whether NSJP and SJP chapters should register under FARA?
2. Has DOJ taken action to assess whether NSJP or associated individuals have committed violations under FARA-related statutes, as described by the Justice Department?⁵²

⁴⁸ Grassley Press. *Following Hamas Attacks On Israel, Grassley, Scott And Colleagues Urge Biden To Convene The G7 To Jointly Sanction Iran*. October 12, 2023. <https://www.grassley.senate.gov/news/news-releases/following-hamas-attacks-on-israel-grassley-scott-and-colleagues-urge-biden-to-convene-the-g7-to-jointly-sanction-iran>.

⁴⁹ Office of the Director of National Intelligence. Statement From Director Of National Intelligence Avril Haines On Recent Iranian Influence Effort, July 9, 2024. <https://www.dni.gov/index.php/newsroom/press-releases/press-releases-2024/3842-statement-from-director-of-national-intelligence-avril-haines-on-recent-iranian-influence-efforts>.

⁵⁰ 22 U.S.C. § 611 (h) and (o).

⁵¹ The allegations highlighted throughout this letter, may also warrant action under FARA-related statutes as described by the Justice Department. <https://www.justice.gov/nsd-fara/fara-related-statutes>

⁵² *Id.*

3. Has DOJ sent any letters of inquiry or determination to NSJP or SJP chapters, or any of their employees? If so, please provide a list of letters sent, and copies. If not, why not?
4. Has NSJP or any SJP chapter ever requested an advisory opinion in relation to work done on behalf of a foreign principal for purposes of FARA? If so, please provide a copy of the request and opinion.

Thank you for your attention to this important matter. If you have any questions, please contact Senate Budget Committee staff at (202) 224-0642.

Sincerely,



Charles E. Grassley

Ranking Member

Committee on the Budget



Joni K. Ernst

United States Senator



Ted Cruz

United States Senator



Tim Scott

United States Senator