



# **Mapping Anti-Muslim Discrimination and Information Manipulation, and its Impact on Humanitarian Aid and Development**

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# List of Abbreviations

ADF	Alliance Defending Freedom	ICNE	Islamic Center of New England
AIFD	American Islamic Forum for Democracy	ICRC	International Committee of the Red Cross
APT	Americans for Peace and Tolerance	IMANA	Islamic Medical Association of North America
BIF	Benevolence International Foundation	INGO	International Non-Governmental Organization
CPAC	Conservative Political Action Conference	IPT	Investigative Project on Terrorism
CSID	Center for the Study of Islam and Democracy	IRUSA	Islamic Relief USA
CSP	Center for Security Policy	IRW	Islamic Relief Worldwide
DAF	Donor Advised Fund	JCF	Jewish Communal Fund
DCLG	Department for Communities and Local Government (UK)	LeT	Lashkar-e-Taiba
DEC	Disasters Emergency Committee	MbZ	Mohammad bin Zayed al Nahyan
DFID	Department for International Development (UK)	MCF	Muslim Charities Forum
DHFC	David Horowitz Freedom Center	MEF	Middle East Forum
EIC	European Investigative Collaborations	MESA	Middle East Studies Association
EMET	Endowment for Middle East Truth	MSA	Ministry of Strategic Affairs (Israel)
FARA	Foreign Agent Registration Act	NGO	Non-Governmental Organization
FCDO	Foreign, Commonwealth & Development Office (UK)	NPA	Norwegian People's Aid
FDD	Foundation for the Defense of Democracies	OPM	Office of Personnel Management
FDO	Foundation Directory Online	RSF	Reporters Without Borders
FIF	Falah-i-Insaniat Foundation	SEO	Search Engine Optimization
GWUPOE	The George Washington University Program on Extremism	SPLC	Southern Poverty Law Center
HAF	Hindu American Foundation	USAID	United States Agency for International Development
HFAC	House Foreign Affairs Committee	USCIRF	United States Commission on International Religious Freedom
HHRD	Helping Hand for Relief and Development	USIP	United States Institute for Peace
HIAS	Hebrew Immigrant Aid Society	UAE	United Arab Emirates
HM	Hizbul Mujahideen		
ICNA	Islamic Circle of North America		

# Executive Summary

*Author's note: The timeline of this research project predates Hamas' horrendous attacks on October 7, 2023, the ferocious response from the Israeli Defense Forces, and the deeply concerning spikes in hate crimes and hate incidents targeting Jews, Muslims, Israelis, and Palestinians in the US and elsewhere.*

Starting in early 2017, there was a notable increase in the frequency and intensity of information manipulation attacks on Muslim-led humanitarian and development aid international non-governmental organizations (INGOs). These attacks originated with a select group of US-based anti-Muslim think tanks and were disseminated through their own websites, the sites of like-minded organizations, and carried by various sympathetic media outlets in the US and abroad. The resulting campaigns were designed in large part to persuade politicians on Capitol Hill to take legislative action to disrupt the operations of US-based Muslim-led humanitarian INGOs.

This report maps the landscape of US-based non-state actors that have engaged in information manipulation campaigns against Muslim-led humanitarian aid and development INGOs. These actors include think tanks, advocacy groups, and their funders. These information manipulation campaigns gained some traction on Capitol Hill from the 115<sup>th</sup> through the 118<sup>th</sup> Congresses and have had cumulative harmful effects on the operations and reputations of the targeted charities.

Five generators of manipulated information—the Middle East Forum, the Investigative Project on Terrorism, the Center for Security Policy, the Gatestone Institute, and Americans for Peace and Tolerance—are primarily responsible for producing the content in question. The allegations made in the context of these campaigns are filled with conspiratorial thinking and fallacious logic, playing on particularly narrow understandings of Muslim-led humanitarian INGOs that collapse the social dimensions of Islamic aid cultures into a singular political dimension. The authors of content for these campaigns employ tactics such as “shotgun argumentation” involving rapidly and haphazardly presenting numerous arguments or points, frequently without adequately supporting or explaining them. They also create the conditions for circular reporting and false corroboration by disseminating their content across a variety of online sources that then serve to “verify” the manipulated information.

These information manipulation attacks are mutually reinforcing and cumulative. Non-state generators of manipulated information draw on histories of hostile state action against Muslim-led humanitarian INGOs. Their attacks accumulate over time and expose US-based Muslim-led humanitarian INGOs to significant political, legal, and reputational risks at home as well as endangering the security of staff in the field.

A variety of political actors have legitimated the attacks on Muslim-led humanitarian INGOs on Capitol Hill by lending credence to false and/or misleading allegations in congressional testimony or otherwise providing platforms that connect legislators with manipulated information. These include Husain Haqqani of the Hudson Institute, M. Zuhdi Jasser of the American Islamic Forum for Democracy, Jonathan Schanzer of the Foundation for Defense of Democracies, and Sarah Stern of the Endowment for Middle East Truth.

Some members of Congress have proven susceptible to amplifying this manipulated information with false and/or misleading allegations becoming part of the congressional record and accumulating over time. Over the course of the 115<sup>th</sup> through the 118<sup>th</sup> Congresses, US legislators took a series of actions premised on cycles of manipulated information about Muslim-led humanitarian INGOs produced by these campaigns. One cycle of manipulated information that we examine in Section 6.2 of this report spurred a series of congressional actions including, but not limited to:

- a House Resolution (H.R. 160).
- congressional letters to President Biden, Attorney General Merrick Garland, and the State Department's Coordinator for Counterterrorism.
- email exchanges between House Foreign Affairs Committee staff and USAID's Bureau for Legislative and Public Affairs team.
- a letter to USAID's Administrator from the Chair of the House Foreign Affairs Committee.

This wasted the time of members of Congress, their legislative staff, and executive branch personnel.

The harmful effects on Muslim-led INGOs produced by information manipulation attacks include the triggering of investigations by charity regulators, government agencies, and Congress. Information manipulation campaigns can also make their way to financial institutions, contributing to financial access challenges for INGOs. This can manifest in account closures, account refusals, and delayed or canceled international wire transfers, which can also have knock-on effects on life saving programs abroad. The generators and promoters of manipulated information then cite any investigations and bank account closures

as further "evidence" of malfeasance. To defend against these sustained attacks, the targeted INGOs are forced to divert resources intended for people in need to public relations and political communications functions.

The generators of manipulated information that we identify in this report operate under 501(c)3 nonprofit organization status. Their activities, while harmful, are not technically illegal due to protections afforded by the First Amendment. We recommend that funders implement due diligence measures to protect their institutions from inadvertently supporting these harmful activities. Funders can consider various approaches to mitigate these risks, such as

- establishing policies that balance the philanthropic principle of donor intent with commitments to justice.
- adopting an "engaged philanthropy" approach that evaluates how organizations gauge their impact on beneficiaries and whether their programming is effectively addressing specific societal needs such as a healthier public discourse.
- embracing philanthropic strategies that focus on local and community needs.

# Introduction

As transnational actors, Muslim INGOs in the US and Europe occupy an important, but precarious, position between east and west, north and south, and have enormous potential to bridge the divides between these polarized geographies.<sup>1</sup> As independence, neutrality and impartiality are core values in the culture of humanitarian and development aid, INGOs avoid weighing in on political debates.<sup>2</sup> However, humanitarian INGOs routinely share information about the plight of vulnerable populations that they serve, often in politically fragile environments. The information that humanitarian INGOs hold and exchange has the potential to reframe international and domestic debates on issues related to populations caught in conflict.<sup>3</sup> This has made INGOs susceptible to attack from state and non-state actors who oppose their work or are threatened by their information-sharing capabilities.

In their seminal work on transnational advocacy networks, Keck and Sikkink (1998) note the threat that international NGOs can pose to various stakeholders by virtue of their information-sharing function:

*[The ability of NGOs to exchange information] may seem inconsequential in the face of the economic, political, or military might of other global actors. But by overcoming the deliberate suppression of information that sustains many abuses of power, networks can help reframe international and domestic debates, changing their terms, their sites, and the configuration of participants.<sup>4</sup>*

In recent years, humanitarian INGOs, such as the White Helmets, have been subjected to devastating information manipulation attacks by hostile state and non-state actors.<sup>5</sup> These attacks have spread false and/or manipulated information by exploiting internet and social media vulnerabilities and leveraging media outlets controlled by, affiliated with, or otherwise sympathetic to, state and non-state actors that oppose the work of humanitarian INGOs.

Politically motivated attacks have exacerbated the significant operational barriers that Muslim-led humanitarian INGOs face. Information manipulation by actors with anti-Muslim or other political agendas that accuse INGOs of links to extremism and terrorism can trigger investigations by charity regulators, government agencies, and Congress, and force the INGOs to divert resources intended for people in need to public relations and political communications functions in order to refute the allegations.<sup>6</sup> Information manipulation campaigns can also make their way to financial institutions, contributing to financial access challenges for INGOs.<sup>7</sup> This can manifest as account closures, account refusals, and delayed or canceled international wire transfers, which can have knock-on effects on life saving programs abroad.<sup>8</sup>

This research contributes to the literature by examining a particular subsection of what has been referred to elsewhere as the “Islamophobia industry.”<sup>9</sup> It fills a gap in the literature by analyzing the dynamics and rhetoric of a campaign of harassment targeting Muslim-led

- Palmer, Victoria. “Analysing Cultural Proximity: Islamic Relief Worldwide and Rohingya Refugees in Bangladesh.” *Development in Practice* 21, no. 1 (February 1, 2011): 96–108.
- For discussions, see Pictet, Jean. “The Fundamental Principles of the Red Cross.” *International Review of the Red Cross* 19, no. 210 (June 1979): 130–49; Forsythe, David P. *The Humanitarians: The International Committee of the Red Cross*. New York, NY: Cambridge University Press, 2005; Terry, Fiona. *Condemned to Repeat? The Paradox of Humanitarian Action*. Ithaca, NY: Cornell University Press, 2002.
- Keck, Margaret, and Katherine Sikkink. *Activists Beyond Borders*. Ithaca: Cornell University Press, 1998.
- Keck and Sikkink. *Activists Beyond Borders*, 7.
- For an account of the White Helmets case, see Reuter, Christoph. “Deadly Intrigue: The Story of the Destruction of an Aid Organization.” *Der Spiegel*, September 12, 2021. <https://www.spiegel.de/international/world/deadly-intrigue-how-the-founder-of-the-white-helmets-came-to-die-a-c20c8449-df8e-406f-9dbd-51330bfee322>.
- See, for example, “Letter from Sharif Aly, CEO of Islamic Relief USA, to Members of Congress,” July 19, 2018. <http://irusa.org/wp-content/uploads/2018/07/2018.7.19-IRUSA-Congressional-Response-to-MEF-Cover-Letter-FINAL.docx.pdf>.
- Kurtzer, Jacob, Sue Eckert, and Sierra Ballard. “Mitigating Financial Access Challenges.” Washington, DC: Center for Strategic and International Studies, October 25, 2022. <https://www.csis.org/analysis/mitigating-financial-access-challenges>.
- Gordon, Stuart, and Sherine El Taraboulsi-McCarthy. “Counter-Terrorism, Bank de-Risking and Humanitarian Response: A Path Forward.” London, UK: Humanitarian Policy Group / Overseas Development Institute, August 2018. <https://cdn.odi.org/media/documents/12368.pdf>; El Taraboulsi-McCarthy, Sherine. “Whose Risk? Bank de-Risking and the Politics of Interpretation and Vulnerability in the Middle East and North Africa.” *International Review of the Red Cross* 103, no. 916–917 (April 2021): 747–62.
- For example, Ali, Wajahat, Eli Clifton, Matthew Duss, Lee Fang, Scott Keyes, and Faiz Shakir. “Fear, Inc.: The Roots of the Islamophobia Network in America.” Washington DC: Center for American Progress, August 2011; Bail, Christopher. *Terrified: How Anti-Muslim Fringe Organizations Became Mainstream*. Princeton, NJ: Princeton University Press, 2015; Green, Todd H. *The Fear of Islam: An Introduction to Islamophobia in the West*. Second edition. Minneapolis, MN: Fortress Press, 2019; Lean, Nathan, and Jack G. Shaheen. *The Islamophobia Industry: How the Right Manufactures Fear of Muslims*. Second Edition. London, UK: Pluto Press, 2017.



humanitarian INGOs and articulating the different tactics that actors use to disrupt the operations and information-sharing functions of humanitarian INGOs. Drawing on the literature on tobacco and climate “denialism,” this report analyzes a variety of tactics and techniques employed by non-state generators of manipulated information. We also document how the manipulated information has formed the basis of a series of harmful activities on Capitol Hill.

The scope of this report is limited to US-based Muslim-led humanitarian INGOs that have been the subject of reputational attacks by US-based non-state actors between September 1, 2013, and August 31, 2023. In examining the political networks mobilized during these attacks, we focus on a more truncated time frame of January 2017 to August 2023. This timeline corresponds with an observed uptick in the frequency and intensity of attacks launched by US-based non-state actors on Muslim-led INGOs starting with the 115<sup>th</sup> Congress. The decision to focus on this subset of information manipulation attacks within this time frame is also driven by the relative success of the attacks in gaining traction on Capitol Hill and the deleterious impacts on the operations of Muslim-led humanitarian INGOs.

There is no consensus in academia or among practitioners on how to define what constitutes a “Muslim” NGO. First, there is the question of whether to treat “Muslim” as a faith category, a marker of religiosity, or an ethnic or demographic category. Second, faith-based NGOs may be reluctant to be identified exclusively by their religious orientation when they view their mission as a universalist and essentially secular one. For the purposes of this report, we define a “US-based Muslim-led humanitarian INGO” as one that (1) explicitly acknowledges and foregrounds an Islamic identity; (2) is primarily engaged in the delivery of humanitarian relief and/or development aid; (3) is based in the United States or operates as the US branch or affiliate of an INGO headquartered in another country; and (4) has an international operational focus. We eliminate any organization that we cannot determine has been the target of more than one reputational attack since September 2012.

These definitional criteria result in the exclusion from our sample of organizations such as ICNA Relief, which fulfills other criteria but whose operational focus is primarily domestic; SAFA Trust which is registered as a charity but is not involved in the delivery of international humanitarian aid; and Mercy-USA for Aid and Development, Rahma Worldwide, and Mercy Without Limits, each of which was the target of a single reputational attack in the given time frame; and the Aga Khan Foundation, which has not been attacked.

Open-source research on reputational attacks on Muslim-led humanitarian INGOs operating between January 2016 and June 2023 produces a list of nine organizations that meet these definitional criteria. In Table 1, we list these organizations in descending order of their size indicated by the revenue figures reported on their respective 2021 IRS 990 forms.

**TABLE 1**  
**Nine largest Muslim-led humanitarian aid and development INGOs.**

Muslim-led Humanitarian Aid and Development (INGO)	Total Revenue (2021)
Islamic Relief USA (the US affiliate of the UK-based INGO Islamic Relief Worldwide)	\$ 136,444,567
Helping Hand for Relief and Development (HHRD)	\$ 80,329,408
Baitulmaal	\$ 33,249,497
LIFE for Relief and Development	\$ 28,366,085
United Mission for Relief and Development (formerly United Muslim Relief)	\$ 24,185,829
Syria Relief and Development	\$ 21,260,144
Zakat Foundation of America	\$ 20,921,666
Muslim Aid (the US affiliate of the UK-based INGO Muslim Aid)	\$ 16,966,673
United Hands Relief	\$ 16,870,671

Sources: IRS 990 forms available through Guidestar, Propublica Nonprofit Explorer, Foundation Directory Online.

In Section 1, we provide some contextualization of the recent history of information manipulation attacks on humanitarian relief and development aid INGOs more generally. In Section 2, we document the participation of various non-state actors, such as US-based think tanks that produce anti-Muslim content and the domestic and international media outlets that disseminate their content. To identify the creators of original content (*generators*), we used tailored search strings to identify sites that collocate the nine Muslim-led organizations with terms such as “terror,” “terrorist” and “terrorism” and “designated.”<sup>10</sup> We limited the time frame to the ten-year period from September 1, 2013, to August 31, 2023, taking steps to avoid biasing the results and to provide for better consistency and replicability. For each search, we coded the results to distinguish between *generators* (creators of original content) and *disseminators* (spreaders of content originally created by *generators*). We then examined the content produced by the three identified *generators* on each of the nine Muslim-led humanitarian INGOs, which led us to identify two additional *generators*.<sup>11</sup> We also identify several *legitimizers* (actors responsible for introducing the content produced by *generators* into political settings). For a full accounting of the methodology used, see the Methodology section at the end of this report.

In all, we identify five *generators*—the Middle East Forum, the Investigative Project on Terrorism, the Gatestone Institute, the Center for Security Policy, and Americans for Peace and Tolerance—as the sources of manipulated information attacks against the nine Muslim-led humanitarian INGOs. We also identify a peripheral network of like-minded individuals and organizations including

various nonprofits, think tanks, and media outlets, that *legitimate* and *disseminate* the manipulated content. In Section 3, we provide a framework of tactics, cognitive biases/manipulations, and motivational biases/manipulations evident in the output of the *generators*. This establishes a basis for devising methods to debunk manipulated information. In analyzing the organizational strategies of—and content produced by—the *generators* of manipulated information, we note commonalities in the tools and techniques that they employ. In Section 4, we examine how manipulated information has percolated through the 115<sup>th</sup>, 116<sup>th</sup>, 117<sup>th</sup>, and 118<sup>th</sup> Congresses and into the executive branch, posing a direct threat to the operations of humanitarian relief and development aid INGOs. In Section 5, we examine the network of funders that provided support to the *generators* of manipulated information from 2017 through 2021, the period of the most frequent and intense attacks on Muslim-led humanitarian INGOs.<sup>12</sup> Finally, in Section 6, we provide two case studies of information manipulation attacks on leading Muslim-led humanitarian INGOs. In the second case study, we demonstrate how a series of attacks on a Muslim-led humanitarian INGO was based on the manipulation of information derived from a low-quality primary source. This manipulated information was not only used in attacks on the INGO in question but was also incorporated into attacks on an exceedingly wide range of political targets in US and Indian media.<sup>13</sup> Given the degree of government control of media in India, as documented by watchdog groups such as Reporters Without Borders, this lends support to arguments that Indian political elites see some benefit in promoting anti-Muslim discourses across domestic media.<sup>14</sup>

10 See the Methodology section at the end of this report for a full account. In the cases of Islamic Relief USA and Muslim Aid USA, which are both affiliates of UK-headquartered charities, we also input searches for their UK entities, Islamic Relief Worldwide and Muslim Aid.

11 An article dated October 4, 2016, and co-authored by Sam Westrop and Charles Jacobs, identified Americans for Peace and Tolerance (APT) as a “counter-extremist and moderate Muslim [group].” Searches on APT’s website revealed that it had conducted attacks on Muslim-led humanitarian INGOs dating back to October 2012. See Jacobs, Charles, and Sam Westrop. “The Muslim Brotherhood Isn’t The Only Gang In Town.” *Islamist Watch* (blog), October 4, 2016. <https://web.archive.org/web/20200810163024/https://www.meforum.org/islamist-watch/50689/the-muslim-brotherhood-isnt-the-only-gang-in-town>; Also, Americans for Peace and Tolerance. “Mass Gov Patrick’s Mosque Visit Sponsored by Group with Ties to Hamas and Gaza Flotilla,” October 18, 2012. <https://web.archive.org/web/20150911044634/https://www.peaceandtolerance.org/2012/10/18/mass-gov-patrick-s-mosque-visit-sponsored-by-group-with-ties-to-hamas-and-gaza-flotilla/>.

12 The choice of 2021 as an endpoint here is dictated by our ability to only access a comparable set of IRS 990 forms through that year.

13 This problematic source was repeated across a variety of articles targeting the Obama administration, the Trump administration, the Biden Administration, the British and Indian governments, USAID, civil society organizations such as World Vision and the Islamic Medical Association of North America (IMANA), Pakistan’s then-Ambassador designate to the US, Masood Khan, and US politicians such as Rep. Ilhan Omar (D-MN), and GOP officials from Michigan and Minnesota.

14 For a recent report on the media environment in India, see Reporters Without Frontiers. “India,” September 4, 2023. <https://rsf.org/en/country/india>. For the promotion of anti-Muslim discourses by Indian political elites, see Ganguly, Sumit. “The Possibilities and Limits of India’s New Religious Soft Power.” Policy Brief. Washington, DC: Berkley Center for Religion, Peace, and World Affairs, July 14, 2020. <https://berkeleycenter.georgetown.edu/publications/the-possibilities-and-limits-of-india-s-new-religious-soft-power> and Ghosh, Rohit. “As Islamophobia Infects Indian Newsrooms, Muslim Journalists Persevere Amid the Bigotry.” Article 14, August 17, 2022. <https://article-14.com/post/as-islamophobia-infects-indian-newsrooms-muslim-journalists-persevere-amid-the-bigotry--62fc4b4738535>; On the Modi government’s relationship with Indian media, see “2022 Country Reports on Human Rights Practices: India.” Washington, DC: US Department of State, March 20, 2023. <https://www.state.gov/reports/2022-country-reports-on-human-rights-practices/india/>; Goel, Vinu, Jeffrey Gettleman, and Saumya Khandelwal. “Under Modi, India’s Press Is Not So Free Anymore.” *The New York Times*, April 2, 2020, sec. World. <https://www.nytimes.com/2020/04/02/world/asia/modi-india-press-media.html>; Faleiro, Sonia. “Umar Khalid Challenged Modi’s Anti-Muslim Agenda. India Accused Him of Terrorism and Locked Him Up.” *The Intercept*, August 6, 2023. <https://theintercept.com/2023/08/06/umar-khalid-india-modi/>.

The information manipulating organizations we examine here express open disdain for academia. Their executives and content producers often engage in open confrontation and *ad hominem* attacks against academics that they perceive as not being in alignment with their political priorities.<sup>15</sup> Their content producers refrain from engaging with nuanced academic debates relevant to their claimed area of focus and expertise. These include complex debates on topics such as the difficulties involved in defining

“extremism,” evidence that undermines their favored theories of radicalization, or the temporal and spatial variations in manifestations of transnational Muslim and Islamist movements. This report posits that siloed contributory expertise—i.e., expertise that purports to contribute to a domain of knowledge but eschews good faith debate with the diverse viewpoints of a recognized society of specialists—should not form the basis of public policy.<sup>16</sup>

15 For examples, see Pipes, Daniel. “[Campus Watch and] Saving Mideast Studies.” Daniel Pipes, September 18, 2003. <https://web.archive.org/web/20090208185322/https://www.danielpipes.org/1251/campus-watch-and-saving-mideast-studies>; Westrop, Sam. “Review of Islam on Campus: Contested Identities and the Cultures of Higher Education in Britain.” *Middle East Quarterly*, January 1, 2022. <https://web.archive.org/web/20211203025021/https://www.meforum.org/62825/a-study-in-delusion-and-irrelevance>; Pipes, Daniel. “Backhanded Endorsements of Campus Watch.” Daniel Pipes, June 21, 2004. <https://web.archive.org/web/20201127145856/https://www.danielpipes.org/blog/2004/06/backhanded-endorsements-of-campus-watch>.

16 Collins, Harry, and Robert Evans. *Rethinking Expertise*. Chicago, IL: University of Chicago Press, 2009, 136-137.

# 1.0 Background



Changing geopolitical, media, and digital communications environments have provided new incentives for state and non-state actors to launch information manipulation campaigns against INGOs. Recent interstate and civil conflicts such as the Russian invasions of Ukraine, the Arab Uprisings, the US invasions of Iraq and Afghanistan, and festering conflicts in Israel-Palestine, Kashmir, and Myanmar have exacerbated instability and political fragility in the Middle East and South Asia. This changing geopolitical environment is further complicated by evolving regional rivalries and new arms races, mounting population and demographic pressures, corruption and failed governance, and excessive military and security spending.<sup>17</sup>

A confluence of critical elements of the social, political, and economic context have created a “crisis in public communications.”<sup>18</sup> There is a profound sense across Western democracies of the failure of the institutions of contemporary governance and distrust in the information systems that are expected to hold them accountable.<sup>19</sup> Trust in US news media reached an all-time low in 2016 and the measure has since become sharply polarized.<sup>20</sup> Many partisans now exhibit strong negative affect toward members of the opposite party, a dynamic that also plays out in online environments.<sup>21</sup> Recent scholarship also provides strong support for the hypothesis that “individuals who report hating their political opponents are the most likely to share political fake news and selectively share content that is useful for derogating these opponents.”<sup>22</sup> Moreover, studies demonstrate that in assessing the credibility

of news on social media, users attach as much importance to the social identity of the person sharing it as to the reputation of the original creator.<sup>23</sup>

These dynamics are both reinforced and exacerbated by developments in the political economy of news media, including the emergence of lucrative partisan media spaces and the corresponding targeting of political-cultural niche markets.<sup>24</sup> Scholars attribute the emergence of the crisis to various origins: the history of business deception to promote corporate interests over the public interest, government lying to promote dubious policies, and the rise of political influence networks that limit government capacities to represent the public interest.<sup>25</sup> This crisis in public communications provides a permissive environment for the forms of information manipulation that are the focus of this report.<sup>26</sup>

The ever-expanding ecosystem of online platforms provides novel and low-cost opportunities for innovations in malicious influence campaigns. The COVID-19 pandemic demonstrated that conspiratorial narratives disseminated online can undermine policy making, hinder crisis response and public health efforts, and/or undermine trust in institutions and science.<sup>27</sup> As governments and social media platforms have become more adept at identifying the sources of influence campaigns, political actors are increasingly outsourcing these functions to troll farms, strategic communications firms, and PR firms in efforts to enhance operational deniability.<sup>28</sup> Moreover, emergent technologies, such as artificial intelligence, are opening

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- 17 Cordesman, Anthony H. “The Greater Middle East: From the ‘Arab Spring’ to the ‘Axis of Failed States.’” Washington, DC: Center for Strategic and International Studies, August 24, 2020. <https://www.csis.org/analysis/greater-middle-east-arab-spring-axis-failed-states>.
  - 18 Chadwick, A. “The new crisis of public communication: Challenges and opportunities for future research on digital media and politics.” Loughborough, UK: Loughborough University. 2019. <https://www.lboro.ac.uk/research/online-civic-culture-centre/news-events/articles/o3c-2-crisis/>
  - 19 Achen, Christopher H., and Larry M. Bartels. *Democracy for Realists: Why Elections Do Not Produce Responsive Government*. Princeton Studies in Political Behavior. Princeton, NJ: Princeton University Press, 2016; Ladd, Jonathan M. *Why Americans Hate the Media and How It Matters*. Princeton, NJ: Princeton University Press, 2012.
  - 20 Brenan, Megan. “Americans’ Trust in Mass Media Edges down to 41%.” Gallup, September 26, 2019. <https://news.gallup.com/poll/267047/americans-trust-mass-media-edges-down.aspx>.
  - 21 Iyengar, Shanto, and Sean J. Westwood. “Fear and Loathing across Party Lines: New Evidence on Group Polarization.” *American Journal of Political Science* 59, no. 3 (July 2015): 690–707; Conover, Michael D., Bruno Goncalves, Jacob Ratkiewicz, Alessandro Flammini, and Filippo Menczer. “Predicting the Political Alignment of Twitter Users.” In 2011 IEEE Third Int’l Conference on Privacy, Security, Risk and Trust and 2011 IEEE Third Int’l Conference on Social Computing, 192–99. Boston, MA, USA: IEEE, 2011.
  - 22 Osmundsen, Mathias, Alexander Bor, Peter Bjerregaard Vahlstrup, Anja Bechmann, and Michael Bang Petersen. “Partisan Polarization Is the Primary Psychological Motivation behind Political Fake News Sharing on Twitter.” *American Political Science Review* 115, no. 3 (August 2021): 999–1015.
  - 23 Messing, Solomon, and Sean J. Westwood. “Selective Exposure in the Age of Social Media: Endorsements Trump Partisan Source Affiliation When Selecting News Online.” *Communication Research* 41, no. 8 (December 2014): 1042–63.
  - 24 Peck, Reece. *Fox Populism: Branding Conservatism as Working Class*. Communication, Society and Politics. New York, NY: Cambridge University Press, 2018.
  - 25 Bennett, W. Lance, and Steven Livingston, eds. *The Disinformation Age: Politics, Technology, and Disruptive Communication in the United States*. New York, NY: Cambridge University Press, 2021.
  - 26 Bennett, W. Lance, and Steven Livingston. “The Disinformation Order: Disruptive Communication and the Decline of Democratic Institutions.” *European Journal of Communication* 33, no. 2 (April 2018): 122–39.
  - 27 Lewandowsky, Stephan, Dawn Holford, and Philipp Schmid. “Public Policy and Conspiracies: The Case of Mandates.” *Current Opinion in Psychology* 47 (October 2022): 101427.
  - 28 Goldstein, Josh A., and Shelby Grossman. “How Disinformation Evolved in 2020.” Brookings, January 4, 2021. <https://www.brookings.edu/articles/how-disinformation-evolved-in-2020/>.

new frontiers in information manipulation (and providing new modes of combating it).<sup>29</sup>

Humanitarian crises are often heavily politicized, with various stakeholders engaged in aggressive efforts to shape their portrayal in both traditional news outlets and online platforms.<sup>30</sup> In the context of these evolving conflict and communications environments, humanitarian INGOs have become the targets of information manipulation campaigns. In some instances, INGOs are targeted because their information-sharing function has disrupted state-led propaganda campaigns or conflict messaging. For example, the humanitarian work of the White Helmets in Syria was subjected to a sustained information manipulation campaign orchestrated by Russian and Syrian officials starting in 2015.<sup>31</sup> In the years that followed, pro-Assad bloggers, alt-right media figures, and self-described anti-imperialists amplified this state-led influence operation.<sup>32</sup> The resulting narratives variously positioned the White Helmets as being puppets of western powers, purveyors of fake footage, or even an Al-Qaeda-linked terrorist organization posing as humanitarian workers.<sup>33</sup> Some accusations claimed that the group had been created by governments that sought to remove Syrian President Bashar al-Assad from power, and that the White Helmets volunteers were “crisis actors” staging scenes to discredit Russia and Syria.<sup>34</sup> Other claims alleged that the White Helmets had been infiltrated by Al-Qaeda and that the organization was being used as a vehicle to raise foreign funds.<sup>35</sup> James Le Mesurier, the founder of the White Helmets, was the subject

of sustained attacks on Russian television and social media, including accusations that he was a terrorist, spy, pedophile, and organ trafficker.<sup>36</sup> In 2018, the campaign against Le Mesurier and the White Helmets received an airing at the UN Security Council, with a panel discussion organized by the Permanent Mission of the Russian Federation.<sup>37</sup>

In late 2018, the UK’s Department for International Development (DFID), ordered an audit of the White Helmets. The audit came as governments sought clarity and accountability over the disbursement of funding in the context of an increasingly fraught and complex security environment in Idlib province, Syria, where the White Helmets were most active. A concurrent audit by Dutch firm SMK raised questions about cash transactions, tax positions, and grant agreements, but made no formal findings.<sup>38</sup> The appearance of impropriety coming on top of the ongoing information manipulation campaigns is seen by some to have driven Le Mesurier to suicide in November 2019.<sup>39</sup> The allegations against Le Mesurier and the White Helmets were subsequently discredited.<sup>40</sup>

Other humanitarian INGOs have been caught up in the hyper-polarization of US politics. For example, in an interview with Sky News in 2017, Girish Menon, CEO of ActionAid, expressed the charity’s concerns about President Trump’s state visit to the UK.<sup>41</sup> Later that evening, a post on LinkedIn alleged that Menon was “an ISIS agent,” which prompted a flood of messages to Menon and the Chair of ActionAid.<sup>42</sup> That same year, the American Red Cross was the target of a stream of

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- 29 Villaseñor, John. “How To Deal with AI Enabled Disinformation?” In *AI in the Age of Cyber-Disorder*, edited by Fabio Ruggie. Milan, Italy: ISPI, 2020. <https://www.ispionline.it/en/publication/ai-age-cyber-disorder-28309>; Benson, Thor. “This Disinformation Is Just for You.” *Wired*, August 1, 2023. <https://www.wired.com/story/generative-ai-custom-disinformation/>.
- 30 Healy, Sean, and Victoria Russell. “The Critical Risk of Disinformation for Humanitarians – The Case of the MV Aquarius.” *Journal of Humanitarian Affairs* 3, no. 1 (July 8, 2021): 28–39.
- 31 See Chulov, Martin. “How Syria’s Disinformation Wars Destroyed the Co-Founder of the White Helmets.” *The Guardian*, October 27, 2020. <https://www.theguardian.com/news/2020/oct/27/syria-disinformation-war-white-helmets-mayday-rescue-james-le-mesurier>; For an early example of a Russian information manipulation attack on the White Helmets, see Sputnik International. “Homs Airstrike: White Helmets Caught Faking Syria Casualties Report,” September 30, 2015. <https://sputnikglobe.com/20150930/ngo-caught-faking-syria-casualties-report-1027807644.html>.
- 32 Solon, Olivia. “How Syria’s White Helmets Became Victims of an Online Propaganda Machine.” *The Guardian*, December 18, 2017. <https://www.theguardian.com/world/2017/dec/18/syria-white-helmets-conspiracy-theories>.
- 33 Worrall, Patrick. “FactCheck: Eva Bartlett’s Claims about Syrian Children.” Channel 4 News, December 20, 2016. <https://www.channel4.com/news/factcheck/factcheck-eva-bartletts-claims-about-syrian-children>.
- 34 Chulov. “Syria’s Disinformation Wars.”
- 35 Reuter, Christoph. “Deadly Intrigue: The Story of the Destruction of an Aid Organization.” *Der Spiegel*, September 12, 2021. <https://www.spiegel.de/international/world/deadly-intrigue-how-the-founder-of-the-white-helmets-came-to-die-a-c20c8449-df8e-406f-9dbd-51330bfee322>.
- 36 Chulov. “Syria’s Disinformation Wars.”
- 37 United Nations UN Audiovisual Library. “Panel Discussion on White Helmets Organization in Syria.” Accessed September 1, 2023. <https://www.unmultimedia.org/avlibrary/asset/2338/2338981>.
- 38 Chulov. “Syria’s Disinformation Wars.”
- 39 Van Sant, Shannon. “Death in Istanbul: The Untold Story behind Syria’s White Helmets.” *POLITICO* (blog), April 19, 2023. <https://www.politico.eu/article/white-helmets-james-le-mesurier-death-emma-winberg-untold-story-syria-war-mayday-rescue/>.
- 40 Reuter. “Deadly Intrigue.”
- 41 Magee, Helen. “Fake News and How It Impacts on the Charity Sector.” London, UK: International Broadcasting Trust, February 2018. <https://www.ibt.org.uk/wp-content/uploads/2018/02/IBT-Fake-News-report-v4inner.pdf>.
- 42 Magee. “Fake News and How It Impacts on the Charity Sector.”

fake news stories in the aftermath of Hurricane Harvey in Texas. A video posted on Facebook, which later went viral, alleged that the charity had stolen donated items from Houston area churches and then sold some of the items and discarded others.<sup>43</sup> The individual who posted the video falsely claimed that the Red Cross' alleged activities were protected under an Obama-era executive order that empowered the government to "take whatever resources they want."<sup>44</sup> Of course, the executive order in question did no such thing and, besides, the American Red Cross is not a government agency.<sup>45</sup>

A sharp political divide in Europe over immigration policy has also generated attacks on INGOs that have been involved in search and rescue operations in the Mediterranean. In 2018, several INGOs, including Save the Children and *Médecins Sans Frontières* (Doctors Without Borders), among others, were falsely accused of colluding with human traffickers while rescuing displaced people in the Mediterranean.<sup>46</sup> The Russian intervention in Syria and its invasions of Ukraine have also generated new attacks on INGOs. In 2018, a video was shared widely in Syria and Ukraine, showing boxes emblazoned with the International Committee of the Red Cross' logo and loaded with cash, falsely accusing the Red Cross of being involved in illegal and corrupt practices.<sup>47</sup>

## 1.1 Pathologizing approaches to Islamic aid cultures

Recent developments in media and communications environments hold particularly pernicious ramifications for American Muslim communities because of the susceptibility of US media and media

audiences to anti-Muslim discourses. Systematic analyses of US media coverage of Muslims have demonstrated the markedly negative character of media depictions over the course of more than two decades.<sup>48</sup> Studies have further suggested that reliance on media for information about Muslims is positively associated with holding stereotypical beliefs, negative emotions, and support for harmful policies.<sup>49</sup> Unfavorable media depictions can also have adverse effects on the national identification of some minority groups, and notably, these effects may be more pronounced than those resulting from personal experiences of discrimination.<sup>50</sup> In sum, the current scholarship indicates that the pervasiveness of negative characterizations of Muslims in US media likely exacerbates both anti-Muslim sentiment and the marginalization of American Muslims. The persistence of negative depictions and tropes about Islam and Muslims in public discourse means that American Muslims and their communal institutions remain particularly susceptible to attack.

Like other religious groups, American Muslims give generously to charity, including to international humanitarian relief efforts. Like the Christian practice of tithing, the practices of *zakat* and *sadaqah* (obligatory and voluntary charity) create moral dispositions towards justice and care.<sup>51</sup> For Muslims, *zakat*, one of the five pillars of Islam, is a multifaceted practice that is interpreted in a variety of ways and is shaped by various social contexts within Muslim life. In the aftermath of the September 11th attacks, however, sweeping and superficial preconceptions about *zakat* as a nefarious source of funding for terrorism cast a pall over customary acts of Muslim charity.<sup>52</sup> In some quarters, Muslim charities came to be perceived as a threat that needed to be contained, rather than as civil

43 Magee. "Fake News and How It Impacts on the Charity Sector"; FOX 26 Houston. "Was That Fake: Red Cross & Child Support." September 22, 2017. <https://www.fox26houston.com/news/was-that-fake-red-cross-child-support>.

44 FOX 26 Houston. "Was That Fake."

45 MacGuill, Dan. "Did the Red Cross Steal Donations in Texas, Empowered by an Obama-Era Executive Order?" Snopes, September 21, 2017. <https://www.snopes.com/fact-check/red-cross-steals-texas/>.

46 Healy, Sean, and Victoria Russell. "The Critical Risk of Disinformation for Humanitarians – The Case of the MV Aquarius." *Journal of Humanitarian Affairs* 3, no. 1 (July 8, 2021): 28–39.

47 Jaff, Dilshad. "The Surge of Spreading Harmful Information through Digital Technologies: A Distressing Reality in Complex Humanitarian Emergencies." *The Lancet* 11 (June 2023). [https://www.thelancet.com/pdfs/journals/langlo/PIIS2214-109X\(23\)00207-3.pdf](https://www.thelancet.com/pdfs/journals/langlo/PIIS2214-109X(23)00207-3.pdf).

48 For systematic analyses, see Bleich, Erik, and A. Maurits van der Veen. *Covering Muslims: American Newspapers in Comparative Perspective*. New York, NY: Oxford University Press, 2021; Ahmed, Saifuddin, and Jörg Matthes. "Media Representation of Muslims and Islam from 2000 to 2015: A Meta-Analysis." *International Communication Gazette* 79, no. 3 (April 2017): 219–44; For a more general discussion, see Lajevardi, Nazita. *Outsiders at Home: The Politics of American Islamophobia*. New York, NY: Cambridge University Press, 2020.

49 Saleem, Muniba, Grace S. Yang, and Srividya Ramasubramanian. "Reliance on Direct and Mediated Contact and Public Policies Supporting Outgroup Harm." *Journal of Communication* 66, no. 4 (August 2016): 604–24.

50 Saleem, Muniba, Magdalena E Wojcieszak, Ian Hawkins, Miao Li, and Srividya Ramasubramanian. "Social Identity Threats: How Media and Discrimination Affect Muslim Americans' Identification as Americans and Trust in the US Government." *Journal of Communication* 69, no. 2 (April 1, 2019): 214–36.

51 Kumar, Dhilip. "Trust and Giving for the Sake of God: The Rise of the Bureaucratic Non-Profit in American Muslim Charity." *Project on Middle East Political Science* (blog), December 18, 2018. <https://pomeps.org/trust-and-giving-for-the-sake-of-god-the-rise-of-the-bureaucratic-non-profit-in-american-muslim-charity>.

52 GhaneaBassiri, Kambiz. "US Muslim Philanthropy after 9/11." *Journal of Muslim Philanthropy and Civil Society* 1, no. 1 (2017): 5–42.

society organizations subject to national regulatory environments and with a donor base that could respond dynamically to changing circumstances.<sup>53</sup>

In the aftermath of the September 11<sup>th</sup> attacks, the US Department of Justice shut down and froze the assets of nine US-based Muslim charities, including some of the then-largest US Muslim relief organizations. Two rulings in US federal courts subsequently highlighted the absence of due process safeguards in these cases.<sup>54</sup> The reflexive decision to shut down and freeze the assets of American Muslim charities indicated the depth and consequences of the pathologizing approaches toward Islam that continue to resonate in the United States today.

The growth in the counter-terror industry after the September 11<sup>th</sup> attacks spurred considerable debate between scholars and practitioners who view Islamic aid cultures in conflict zones, often from a distance and through security or counter-terror lenses, and scholars who have conducted observational fieldwork in the same conflict zones.<sup>55</sup> Benthall (2016) notes that,

... the methods of enquiry used [by counter-terrorism experts] depend critically on the construction of patterns of association through analysis of communications and meetings between individuals. There is thus a grave risk of attributing guilt by association. This risk is compounded by the citation of highly biased press reports and intelligence websites, and sometimes by reliance on statements extracted from detainees under coercive interrogation.<sup>56</sup>

Benthall's observations point to the tendency for those who exclusively view Islamic aid cultures through a security lens to succumb to confirmation bias—or “the seeking or interpreting of evidence in ways that are partial to existing beliefs, expectations, or a hypothesis in hand.”<sup>57</sup> In the sections that follow, we will identify and analyze the range of non-state actors that have engaged in information manipulation campaigns targeting Muslim-led humanitarian INGOs since 2016. In so doing, we will examine their tactical and rhetorical *modi operandi*, lobbying efforts, and funding sources.

53 GhaneaBassiri. “US Muslim Philanthropy after 9/11.”

54 In recent instances where US charitable organizations contested their classification as supporters of terrorism, the courts have determined that the Treasury Department's procedures do not afford them a substantive opportunity to dispute the designation, as mandated by the Fifth Amendment. Additionally, the courts have found that freezing their assets without a warrant constitutes a violation of the Fourth Amendment. See *Al Haramain Islamic Foundation, Inc. et al. v. US Department of Treasury et al.*, No. 10-35032 (9th Cir. 2011 February 27, 2012) and *Kindhearts for Charitable Humanitarian Development, Inc. v. Geithner*, No. 3:08CV2400. (United States District Court, N.D. Ohio August 18, 2009).

55 For counter-terrorism perspectives, see Levitt, Matthew. *Hamas: Politics, Charity, and Terrorism in the Service of Jihad*. New Haven, CT: Yale University Press, 2006; Burr, Millard, and Robert O. Collins. *Alms for Jihad: Charity and Terrorism in the Islamic World*. New York, NY: Cambridge University Press, 2006; For sociological and ethnographic perspectives, see Benthall, Jonathan. *Islamic Charities and Islamic Humanism in Troubled Times*. Humanitarianism. Manchester: Manchester University Press, 2016, Chapter 5, note 39; Roy, Sara M. *Hamas and Civil Society in Gaza: Engaging the Islamist Social Sector*. Princeton Studies in Muslim Politics. Princeton, NJ: Princeton University Press, 2011, 98-99, 138-139.

56 Benthall, *Islamic Charities*.

57 Nickerson, Raymond S. “Confirmation Bias: A Ubiquitous Phenomenon in Many Guises.” *Review of General Psychology* 2, no. 2 (June 1998): 175–220.



2.0

# The information manipulation network



We define information manipulation as the production, dissemination, and legitimation of false and/or misleading narratives that are then weaponized to exploit sociopsychological, infrastructural, and physical vulnerabilities in the information environment to influence public opinion and/or to incline powerholders to voluntarily make predetermined decisions desired by the initiator.<sup>58</sup>

There is often a dynamic interplay between state and non-state actors in the production and dissemination of manipulated information. The information manipulation campaigns that are the focus of this report naturally involve asymmetries of power, as is the case with most influence campaigns.<sup>59</sup> The civil society targets of information manipulation campaigns may be targeted from above by state actors that wield considerably more informational power but also from below by non-state actors that wield less informational power. Both state and non-state actors enjoy access to low-cost digital tools to help shape the information space as part of a manipulation campaign. These include the ability to amplify manipulated information using automated social media accounts (bots) and troll armies to retweet and “like” manipulated content and drown out critical voices.<sup>60</sup>

While this research revealed additional non-state *generators* of manipulated information about Muslim-led humanitarian INGOs in the UK, Israel, India, Belgium (Brussels), and elsewhere, the scope of this report is limited to the output of US-based non-state *generators* of manipulated information. Limiting the focus to non-state actors in the US is a practical choice because the research question primarily concerns the impacts on US non-state actors (US-based Muslim-led humanitarian relief and development aid INGOs). Limiting the scope to US-based non-state actors allows for a more in-depth

exploration of the cases we present here without the added complexity of including non-state actors from multiple countries. This research also requires an analysis of unique characteristics of the US political system and the inclusion of other non-state actors would add unnecessary complexity. However, in the case studies in Section 6, we will broaden the scope to illuminate the interplay that occurs when the non-state *generators* of manipulated information graft their campaigns onto histories of state hostility toward Muslim-led humanitarian INGOs.

Civil society organizations pursue distinct goals, with some NGOs advocating for the advancement of human rights while others seek to actively deny others equality, often while employing a rights-based discourse.<sup>61</sup> Thus, the phenomenon of NGOs attacking other NGOs—or what Gordon (2023) calls “the contemporary civil society wars”—is unsurprising.<sup>62</sup> Bob (2019) identifies tactics that civil society actors employ to attack claims for equality or human rights, including denial (refusing the legitimacy of the claim), rivalry (asserting a competing right), reversal (claiming they are the true victims), and repudiation (refusing to recognize the right).<sup>63</sup>

## 2.1 Targets and audiences

Information manipulation campaigns can target a diverse range of actors, such as governments, international organizations, labor unions, advocacy NGOs, faith communities, corporations, or social movements. Table 2 presents a selection of variables that highlight the specific vulnerabilities of prominent Muslim-led humanitarian INGOs to information manipulation campaigns, often facilitated by an information environment that is susceptible to the weaponization of anti-Muslim narratives.

58 This definition draws on Andreas Krieg’s definition of “subversion.” Krieg, Andreas. *Subversion: The Strategic Weaponization of Narratives*. Washington, DC: Georgetown University Press, 2023, 2.

59 Manheim, Jarol B. *Strategy in Information and Influence Campaigns: How Policy Advocates, Social Movements, Insurgent Groups, Corporations, Governments, and Others Get What They Want*. New York, NY: Routledge, 2011.

60 Foster, James C. “The Rise of Social Media Botnets.” *Dark Reading*, July 7, 2015. <https://www.darkreading.com/attacks-breaches/the-rise-of-social-media-botnets>.

61 Bob, Clifford. *Rights as Weapons: Instruments of Conflict, Tools of Power*. Princeton, NJ: Princeton University Press, 2019.

62 See Gordon, Neve. “Between Human Rights and Civil Society: The Case of Israel’s Apartheid Enablers.” *Law & Social Inquiry*, July 20, 2023, 1–27. For the weaponization of rights, see Bob, Clifford. *Rights as Weapons: Instruments of Conflict, Tools of Power*. Princeton, NJ: Princeton University Press, 2019.

63 Bob. *Rights as Weapons*. Chapter 3; See also Perugini, Nicola, and Neve Gordon. *The Human Right to Dominate*. Oxford Studies in Culture and Politics. New York, NY: Oxford University Press, 2015.

**TABLE 2**  
**Variables that render Muslim-led humanitarian INGOs more vulnerable to information manipulation campaigns.**

<b>Legitimacy</b>	Targets are especially vulnerable to information manipulation campaigns when they can be more readily delegitimized among key intermediaries, such as political elites, because of the prevalence of entrenched stereotypes and biases.
<b>Uncertain perceptions</b>	An information environment marked by anti-Muslim discourses and negative media depictions provides fertile ground for information manipulators to position the targeted Muslim INGO as somehow acting badly or espousing unpopular values.
<b>High visibility</b>	A target that is highly visible may be especially vulnerable to information manipulation campaigns in part because its visibility deprives the target of the ability to hide from view, while at the same time assuring that any campaign successes are likely to be widely noted.
<b>High transparency</b>	Targets that are relatively transparent, to the extent that they are required by law to reveal detailed financial and other information about themselves, are inherently more vulnerable to attack simply because it is easy to access more sensitive information that can be manipulated and used by malicious actors to launch attacks.
<b>Association with risk</b>	Given the prevalence and persistence of negative tropes and stereotypes about a group, publics may more readily associate the group and their communal institutions with risks, such as threats to public safety or security, economic or political instability, extremism, or terrorism.
<b>Risk aversion</b>	Targets that have a particularly strong aversion to risk, such as humanitarian relief organizations, have an increased vulnerability to campaign pressure because of their susceptibility to threats, which can have a force multiplication effect.
<b>Inherent structural vulnerabilities</b>	Targeted organizations are often complex entities, and some of their component elements—demographic groupings, cultural norms, religious values, political interests, economic interests—may render them disproportionately susceptible to information manipulation.
<b>Instability</b>	Targets that do not have long established and constant relationships with their key stakeholders, such as a rapidly growing Muslim-led humanitarian INGO, offer increased opportunities for information manipulation campaigns to apply leverage and pressure.

*Adapted from Manheim, Jarol B. Strategy in Information and Influence Campaigns: How Policy Advocates, Social Movements, Insurgent Groups, Corporations, Governments, and Others Get What They Want. New York, NY: Routledge, 2011.*

A campaign may target a variety of audiences depending on the goals and resources of the campaign. Influential stakeholders, such as legislators or executive agency personnel, are often prime targets because of their ability to amplify manipulated information, enter it into the public record, and/or advance policy goals. Much like propaganda, information manipulation campaigns may discard rational evidence and engage in fallacious argumentation to appeal to the emotions of public audiences and create or perpetuate moral

panics.<sup>64</sup> This often involves a deliberate strategy to exacerbate existing social and political cleavages and perpetuate the idea that some evil threatens the well-being of society or of one's immediate community.<sup>65</sup> Research indicates that falsehoods that evoke high arousal emotions, such as fear and anger, increase the likelihood a message will go viral (as falsehoods spread faster than truth online).<sup>66</sup> In Section 3, we will examine a set of rhetorical techniques employed by the *generators* of manipulated information.

64 Walton, Douglas. "What Is Propaganda, and What Exactly Is Wrong with It?" *Public Affairs Quarterly* 11, no. 4 (October 1, 1997).

65 See Bennett, W Lance, and Steven Livingston. "The Disinformation Order: Disruptive Communication and the Decline of Democratic Institutions." *European Journal of Communication* 33, no. 2 (April 2018): 122–39.

66 Berger, Jonah, and Katherine L. Milkman. "What Makes Online Content Viral?" *Journal of Marketing Research* 49, no. 2 (April 2012): 192–205. Vosoughi, Soroush, Deb Roy, and Sinan Aral. "The Spread of True and False News Online." *Science* 359, no. 6380 (March 9, 2018): 1146–51.

## 2.2 The Information Manipulation Network

Information manipulation attacks that target Muslim-led humanitarian INGOs are often rooted in a particularly narrow understanding of Islamic aid cultures that collapses their social dimensions into the political.<sup>67</sup> This understanding of Muslim-led humanitarian INGOs as inherently political actors negates the organizational heterogeneity, processes of intergenerational change, and the prioritization of universalist professionalized identities over “Islamic” identities that marks these organizations.<sup>68</sup>

Some non-state actors may be animated to attack humanitarian INGOs by US or foreign power holders or may themselves be responsible for conceiving of the idea to launch a campaign against humanitarian INGOs. US civil society groups may manipulate information and weaponize it in the public sphere by producing content for public and media consumption. We call these *generators*, and they form the core of the information manipulation network. Others may act to legitimate weaponized narratives, whether on Capitol Hill or in adjacent spaces, such as at policy-relevant think tank events. We call these actors *legitimizers*. The defining feature of a *legitimizing* is

that they validate the manipulated information of the *generators* in policy spaces whether through direct testimony on Capitol Hill, hosting the *generators* at think tanks where they interface with members of Congress, or organizing high profile campaigns that target US politicians and include manipulated information. In short, *legitimizers* are actively involved in injecting weaponized narratives into the political realm by connecting US lawmakers with manipulated information. Finally, a variety of media outlets and civil society organizations disseminate weaponized narratives more widely in public and media spaces. We call these *disseminators*, and they reproduce the content of the *generators* for public consumption, usually to targeted audiences.

To identify the *generators*, *legitimizers*, and *disseminators* of manipulated information, we conducted a series of structured online searches. Once we identified the *generators*, we conducted a second series of searches on each of their websites to identify additional *generators* and *disseminators*. The methodology used to perform these searches is outlined in detail in the methodology section at the end of this report. We identify the US *generators*, *legitimizers*, and *disseminators* in Table 3.

**TABLE 3**  
**US-based generators, legitimizers, and disseminators of manipulated information used to attack Muslim-led humanitarian INGOs.**

<b>Generators</b>	<ul style="list-style-type: none"> <li>• The Middle East Forum</li> <li>• The Investigative Project on Terrorism</li> <li>• The Gatestone Institute</li> <li>• The Center for Security Policy</li> <li>• Americans for Peace and Tolerance</li> </ul>
<b>Legitimizers</b>	<ul style="list-style-type: none"> <li>• M. Zudhi Jasser, The American-Islamic Forum for Democracy</li> <li>• Jonathan Schanzer, The Foundation for Defense of Democracies</li> <li>• Sarah Stern, The Endowment for Middle East Truth</li> <li>• Husain Haqqani, The Hudson Institute</li> </ul>
<b>Disseminators</b>	<ul style="list-style-type: none"> <li>• Jewish News Syndicate</li> <li>• Morning Consult</li> <li>• National Review</li> <li>• Providence Magazine</li> <li>• The American Spectator</li> <li>• The American Thinker</li> <li>• The Daily Wire</li> <li>• The Geopolitics</li> <li>• The New English Review</li> <li>• The Washington Examiner</li> <li>• Washington Free Beacon</li> <li>• Xpian News</li> </ul>

<sup>67</sup> Petersen, Marie Juul. *For Humanity or for the Umma? Aid and Islam in Transnational Muslim NGOs*. London, UK: Hurst & Company, 2015, 2-3.

<sup>68</sup> For an account of how these dynamics have shaped the cultures of Islamic Relief and Muslim Aid, see Petersen, Marie Juul. *For Humanity or for the Umma? Aid and Islam in Transnational Muslim NGOs*. London, UK: Hurst & Company, 2015, 121-124.

The *generators* work together to cast doubt on the reputation of Muslim-led charities by attempting to link them with extremism and even terrorism.<sup>69</sup> Much of the content produced by the *generators* relies on the fact that bad impressions and negative stereotypes form more quickly and are more resistant to disconfirmation than good and positive ones.<sup>70</sup> The content that the *generators* create is published on their respective websites, the websites of their various projects and spinoff groups, as well as in US publications such as *The American Spectator*, *The Daily Caller*, *The National Review*, and *The American Thinker*.<sup>71</sup> It is also often picked up by international press outlets, especially Indian press where anti-Muslim narratives have proven to be particularly resonant under the Modi government (see Section 6.2). This generates a cycle of manipulated information with the creation of multiple sources appearing to corroborate or “verify” the false and/or misleading information.

In 2017, figures with explicit anti-Muslim agendas—including Steve Bannon, Michael Flynn and Sebastian Gorka—were brought into the center of government power.<sup>72</sup> With Republicans holding the Senate and the House, the information manipulators sensed a political opportunity to gain traction on their policy agenda.<sup>73</sup> For one of these non-state actors, the Middle East Forum, the number 1 item on its policy wish list for the 115<sup>th</sup> Congress was “Israel Victory”; number 4 was “Defunding and Diminishing Islamic Relief.”<sup>74</sup> The *generators* soon began to significantly ramp up attacks on Muslim humanitarian relief and development aid organizations (see Figure 1). This concerted campaign aimed to cast doubt on the reputation of Muslim-led humanitarian INGOs and press members of Congress into investigating, defunding, or even shuttering them (see Section 4 on political networks).

### 2.2.1 The “Generators”

The *generators*, *legitimizers*, and *disseminators* operate together as a mutually supportive ecosystem. Of the five *generators* that we identify here, two organizations—the Middle East Forum (MEF) and the Investigative Project on Terrorism (IPT)—create by far most of the manipulated information used to target Muslim-led humanitarian relief and development aid INGOs (see Figure 2). The Gatestone Institute and the Center for Security Policy (CSP) produce a relatively small amount of content and act more as policy incubators. That is, the fact that the early attacks on Muslim-led INGOs originated at these organizations may indicate a role in priority setting and policy development.

The Gatestone Institute was founded by Sears-Roebuck heiress Nina Rosenwald who has served on the executive committee of the Middle East Forum and is a founding member of the Board of Regents for the Center for Security Policy.<sup>75</sup> Rosenwald has also been a major funder of four of the five *generators* we identify here (see Section 5 on funding). The Gatestone Institute has a recent history of success in injecting anti-Muslim tropes into the political conversation. Its false narratives about the existence of “no-go zones” in European cities filtered into the 2016 Republican primary, with Donald Trump, Sen. Ted Cruz (R-TX), and former governor of Louisiana, Bobby Jindal, all repeating the false claim.<sup>76</sup>

Frank Gaffney, founder of the Center for Security Policy (CSP), has a history of advancing baseless conspiracy theories, including insinuations that President Obama might be a closet Muslim.<sup>77</sup> Gaffney attempts to delegitimize larger American Muslim communal organizations by presenting them as fronts for the

69 For examples of collaborations between *generators* to attack Muslim-led humanitarian INGOs, see Shankar, Abha, and Sam Westrop. “Special Report Bangladeshi Islamists Go to Washington: But Will Washington Know Who It’s Dealing With?” The Investigative Project on Terrorism, September 24, 2018. <https://web.archive.org/web/20200814170914/https://www.investigativeproject.org/7629/special-report-bangladeshi-islamists-go-to>; Shankar, Abha, and Martha Lee. “Investigation Exposes Terror Ties Behind Islamist Charity’s Humanitarian Facade.” Middle East Forum, April 6, 2020. <https://web.archive.org/web/20200411102136/https://www.meforum.org/60664/investigation-exposes-terror-ties-of-islamist-charity>; Jacobs, Charles, and Sam Westrop. “The Muslim Brotherhood Isn’t the Only Gang in Town.” Islamist Watch, October 4, 2016.

70 Baumeister, Roy F., Ellen Bratslavsky, Cathrin Finkenauer, and Kathleen D. Vohs. “Bad Is Stronger than Good.” *Review of General Psychology* 5, no. 4 (December 2001): 323–70.

71 Our analysis demonstrates that between January 2012 and June 2023, *The American Spectator* carried eight MEF-produced articles attacking Muslim-led humanitarian INGOs, *The Daily Caller* carried six, *The National Review* carried four, and *The American Thinker* carried three attack articles.

72 Patel, Faiza, and Rachel Levinson-Waldman. “The Islamophobic Administration.” New York, NY: Brennan Center for Justice, April 19, 2017. <https://www.brennancenter.org/our-work/research-reports/islamophobic-administration>.

73 Bump, Philip. “Donald Trump’s Call to Ban Muslim Immigrants Is Based on a Very Shoddy Poll.” *The Washington Post*, December 7, 2015. <http://www.washingtonpost.com/news/the-fix/wp/2015/12/07/donald-trumps-call-to-ban-muslims-from-coming-to-the-u-s-has-a-very-bad-poll-at-its-center/>.

74 The author is not in possession of the Middle East Forum’s original document. “Policy Agenda.” Middle East Forum, n.d. [https://scharinteragmu.wpengine.com/wp-content/uploads/2023/12/MEF\\_policy\\_agenda\\_2021.pdf](https://scharinteragmu.wpengine.com/wp-content/uploads/2023/12/MEF_policy_agenda_2021.pdf).

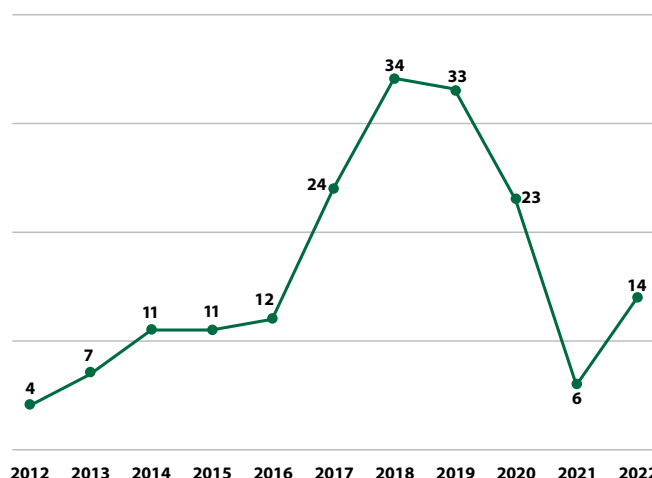
75 Middle East Forum. “Middle East Forum Board of Governors: Middle East Forum,” June 29, 2014. <https://web.archive.org/web/20140629034933/http://www.meforum.org/governors.php>; Gatestone Institute. “Nina Rosenwald.” Accessed September 7, 2023. <https://web.archive.org/web/20230214182407/https://www.gatestoneinstitute.org/biography/Nina+Rosenwald>.

76 Fang, “John Bolton Chairs an Actual ‘Fake News’ Publisher”; For an early example on the Gatestone Institute’s site, see Kern, Soeren. “France Seeks to Reclaim ‘No-Go’ Zones.” Gatestone Institute, August 24, 2012. <https://web.archive.org/web/20230222172415/https://www.gatestoneinstitute.org/3305/france-no-go-zones>.

77 Gaffney, Frank. “America’s First Muslim President?” *The Washington Times*, June 9, 2009, sec. Commentary. <https://www.washingtontimes.com/news/2009/jun/9/americas-first-muslim-president/>.

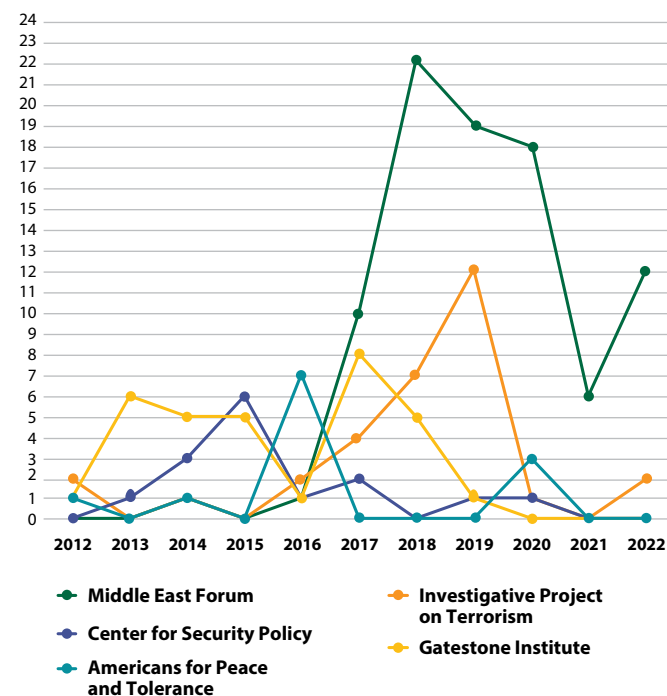
Muslim Brotherhood. In 2010, he stated that “virtually any Muslim American organization in this country of any prominence is a Muslim Brotherhood front.”<sup>78</sup> In 2011, the American Conservative Union banned Gaffney from speaking at the Conservative Political Action Conference (CPAC). The ban was imposed after Gaffney charged that fellow Republicans, Suhail Khan and Grover Norquist, were helping CPAC become infiltrated by the Muslim Brotherhood.<sup>79</sup>

**FIGURE 1**  
Number of articles written by the five generators attacking nine US-based Muslim-led humanitarian INGOs by year, 2012 to 2022.



The five generators are: The Middle East Forum, the Investigative Project on Terrorism, the Gatestone Institute, the Center for Security Policy, and Americans for Peace and Tolerance. The nine US-based Muslim-led humanitarian INGOs are Islamic Relief USA (and its parent organization Islamic Relief Worldwide), Helping Hand for Relief and Development, Baitulmaal, LIFE for Relief and Development, Syria Relief and Development, the Zakat Foundation of America, Muslim Aid USA (and its parent organization Muslim Aid UK), and United Hands Relief.

**FIGURE 2**  
Number of articles attacking Muslim-led humanitarian INGOs published by each of the five generators by year, 2012 to 2022.



In 2015, CSP organized four National Security Action Summits in crucial primary states South Carolina, Iowa, New Hampshire, and Nevada. The events provided CSP with an opportunity to promote its policy agenda during the 2016 presidential election cycle.<sup>80</sup> In 2017, having long pushed for restrictions on immigration from Muslim-majority countries, CSP found its unscientific online polling used to justify President Trump’s Executive Order 13769 (often referred to as the “Muslim ban”).<sup>81</sup>

78 “Glenn Beck: Does Imam Behind ‘Ground Zero Mosque’ Want to Bring Shariah Law to America?” *Glenn Beck*. Fox News, August 23, 2010. <https://www.foxnews.com/story/glenn-beck-does-imam-behind-ground-zero-mosque-want-to-bring-shariah-law-to-america>.

79 See Beinart, Peter. “John Bolton and the Normalization of Fringe Conservatism.” *The Atlantic*, March 24, 2018. <https://www.theatlantic.com/politics/archive/2018/03/john-bolton-anti-muslim-enabler/556442/>; for the CSP’s perspective, see Ibrahim, Raymond. “A Disturbing Event: The American Conservative Union Embraces an Islamist.” Center for Security Policy (blog), August 27, 2012. <https://centerforsecuritypolicy.org/a-disturbing-event-the-american-conservative-union-embraces-an-islamist/>.

80 Center for Security Policy. “National Security Action Summits.” Accessed September 13, 2023. <https://centerforsecuritypolicy.org/nsas/>.

81 Bump, Philip. “Donald Trump’s Call to Ban Muslim Immigrants Is Based on a Very Shoddy Poll.” *The Washington Post*. December 7, 2015; Hauslohner, Abigail. “How a Series of Fringe Anti-Muslim Conspiracy Theories Went Mainstream — via Donald Trump.” *The Washington Post*. November 5, 2016; Ali, Wajahat, Eli Clifton, Matthew Duss, Lee Fang, Scott Keyes, and Faiz Shakir. “Fear, Inc.: The Roots of the Islamophobia Network in America.” Washington DC: Center for American Progress, August 2011.

Attacks on Muslim-led humanitarian INGOs by the Gatestone Institute and CSP dropped off substantially once MEF and IPT started generating large quantities of manipulated information with which to attack the target organizations (see Figure 2). The seven attacks by Americans for Peace and Tolerance in 2016 correlate with its hiring that year of Sam Westrop as its research director.<sup>82</sup> In 2017, Westrop moved over to the Middle East Forum where he became by far the most prolific author of weaponized narratives based on manipulated information about Muslim-led humanitarian INGOs.

The large volume of false and/or deceptive content that MEF, IPT, and other *generators* produce accumulates over time and floods the information environment, distorting public and political understandings of legitimate Muslim-led civil society organizations and overwhelming the targeted INGOs. MEF and IPT place their content with media *disseminators* that are sympathetic (or susceptible) to their anti-Muslim narratives. The repetition of manipulated information across various sources creates the illusion of corroboration. Mainstream news magazines, such as *Newsweek*, have carried MEF-generated opinion content, with one such op-ed involving an information manipulation attack on Helping Hand for Relief and Development (HHRD), a prominent US-based Muslim-led humanitarian INGO (see the case study in Section 6.2).<sup>83</sup>

### 2.2.2 The “Legitimizers”

*Legitimizers*, such as M. Zuhdi Jasser of the American Islamic Forum for Democracy (AIFD) and Jonathan Schanzer of the Foundation for the Defense of Democracies (FDD) occasionally testify at congressional hearings to lend credibility to the false and/or misleading allegations made by MEF and other *generators*.<sup>84</sup> Jasser serves on the advisory board of the Gatestone Institute and regularly appears on the Center for Security Policy’s “Secure Freedom Radio” and “Secure America TV” shows.<sup>85</sup> He lends legitimacy to the *generators* by virtue of his self-identification as a “moderate” or “reformist” Muslim—and media and political representations of him as a “good” Muslim.<sup>86</sup>

Jasser has little discernible support among American Muslim communities.<sup>87</sup> In 2012, sixty-four groups representing American Muslim lawyers, students, mosques, and an array of advocacy organizations opposed Jasser’s appointment to the US Commission on International Religious Freedom (USCIRF).<sup>88</sup> Their letter noted that,

*His consistent support for measures that threaten and diminish religious freedoms within the United States demonstrates his deplorable lack of understanding of and commitment to religious freedom and undermines the USCIRF’s express purpose.*<sup>89</sup>

- 82 APT often does not identify the authors of its articles so we can’t make a definitive determination. See Westrop’s biographical entry: Middle East Forum. “Staff Bios.” Accessed September 13, 2023. <https://web.archive.org/web/20231201042918/https://www.meforum.org/about/staff-bios>.
- 83 COVID Relief Funds Went to Violent Extremists.” *Newsweek*, December 7, 2020. <https://www.newsweek.com/covid-relief-funds-went-violent-extremistsopinion-1552485>; When articles by *generators* are carried as op-eds in media outlets with the standard disclaimer, we do not categorize the media outlet in question as *disseminators*, given the wide latitude that is afforded to opinion columns. Examples of media outlets that have carried op-eds by *generators* include *The Algemeiner*, *The Daily Caller*, and *Newsweek*.
- 84 US Congress, House, *The Muslim Brotherhood’s Global Threat, Before the Subcommittee on National Security of the Committee on Oversight and Government Reform*, 115th Congress, (2018). <https://www.govinfo.gov/content/pkg/CHRG-115hhrg31367/html/CHRG-115hhrg31367.htm>.
- 85 Jasser also serves on the advisory board of the Clarion Project, an organization that promotes conspiratorial claims that “radical Muslims” have “infiltrated America.” For examples of Jasser’s appearance on CSP programming, see Gaffney, Frank. “Dr. Zuhdi Jasser on yet Another French Tragedy - Center for Security Policy.” Secure Freedom Radio. Accessed September 13, 2023. <https://web.archive.org/web/20230815150534/https://centerforsecuritypolicy.org/dr-zuhdi-jasser-on-yet-another-french-tragedy/>; also, Gaffney, Frank. “Zuhdi Jasser on a Rising Islamist Movement across the World - Center for Security Policy.” Securing America. Accessed September 13, 2023. <https://web.archive.org/web/20230824002607/https://centerforsecuritypolicy.org/securing-america-zuhdi-jasser-on-a-rising-islamist-movement-across-the-world/>.
- 86 See Mamdani, Mahmood. *Good Muslim, Bad Muslim: America, the Cold War, and the Roots of Terror*. New York, NY: Three Leaves Press, 2004.
- 87 See Furnish, Timothy R. “Zuhdi Jasser, M.D.: Islam’s Luther—or Its Don Quixote?” History News Network. Accessed September 6, 2023. <https://hnn.us/articles/125540.html>; Ali, Muna. *Young Muslim America: Faith, Community, and Belonging*. New York, NY: Oxford University Press, 2018, 189; also, Serwer, Adam. “Muslim Group Leader to NYPD: Thanks for Spying on Us.” *Mother Jones*, March 19, 2012. <https://www.motherjones.com/politics/2012/03/muslim-group-leader-nypd-thanks-spying-us-zuhdi-jasser/>.
- 88 NBC News. “US Rights Appointee Zuhdi Jasser Hits Raw Nerve for American Muslims,” April 12, 2012. <https://www.nbcnews.com/news/world/u-s-rights-appointee-zuhdi-jasser-hits-raw-nerve-american-flna713727>.
- 89 “Letter to Sen. Daniel Inouye, Sen. Mitch McConnell, and Sen. Richard Durbin Expressing Concern over the Appointment of Dr. Zuhdi Jasser to the United States Commission on International Religious Freedom (‘USCIRF’),” April 12, 2012. Internet Archive. <https://scharinteragmu.wpengine.com/wp-content/uploads/2023/12/Letter-to-Inouye-et-al-re-Zuhdi-Jasser.pdf>.

In July 2018, Jasser referred to MEF's manipulated information in congressional testimony when, in responding to a question posed by Rep. Paul Gosar (R-AZ), he stated under oath that "Bangladesh, a Muslim country, does not allow Islamic Relief to do humanitarian work with Rohingya refugees because they're worried about radicalization."<sup>90</sup> This claim is demonstrably false. Islamic Relief has a long-standing presence in Bangladesh since the early 1990s and IRUSA continues to provide programming for Rohingya refugees in Bangladesh to this day.<sup>91</sup>

Jonathan Schanzer of the Foundation for Defense of Democracies (FDD) started his career as a research fellow at the Middle East Forum.<sup>92</sup> He has also worked as a terrorism finance analyst at the US Department of Treasury and as a research fellow at the Washington Institute for Near East Policy.<sup>93</sup> In April 2016, Schanzer, now affiliated with the think tank and lobbying group Foundation for Defense of Democracies (FDD), submitted written testimony to a Joint Hearing before the House Foreign Affairs Subcommittee on Terrorism, Nonproliferation, and Trade and the Subcommittee on the Middle East and North Africa. In his prepared testimony, Schanzer made the misleading claim that, "[The Zakat Foundation's] executive director is Khalil Demir. Demir signed the IRS 990 forms for a group Treasury designated in 2002 for funding Al-Qaeda: Benevolence International Foundation (BIF)."<sup>94</sup>

While this is technically true, it is misleading because Schanzer fails to disclose that the Justice Department subsequently dropped its case against BIF.<sup>95</sup> BIF's CEO, Enaam Arnaout, was ultimately cleared by US courts of any connection to terrorism.<sup>96</sup> US District Judge Suzanne B. Conlon told prosecutors they had "failed to connect the dots" and found no evidence that Arnaout had "identified with or supported" terrorism.<sup>97</sup> It is inconceivable that Schanzer did not know this when he attempted to tie the Zakat Foundation to BIF, and ultimately to Al-Qaeda, in his congressional testimony.

We also identify Sarah Stern of the Endowment for Middle East Truth and Husain Haqqani of the Hudson Institute as *legitimizers*. In March 2019, Stern played an organizing role in marshaling support for a letter to then-House Speaker Nancy Pelosi that used manipulated information about a Muslim-led humanitarian INGO generated by the Middle East Forum to lobby for the removal of Rep. Ilhan Omar (D-MN) from the House Foreign Affairs Committee.<sup>98</sup> In the letter, Stern named Rep. Omar's ties to Islamic Relief USA as one of the signatories' concerns about her participation on the House Foreign Affairs Committee.<sup>99</sup> The letter built on previous attacks on Islamic Relief by state and non-state actors, employed shotgun argumentation, and depended heavily on a series of "guilt by association" narratives originally produced by the Middle East Forum.<sup>100</sup>

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- 90 US Congress, House, *The Muslim Brotherhood's Global Threat, Before the Subcommittee on National Security of the Committee on Oversight and Government Reform*, 115th Congress, (2018). <https://www.govinfo.gov/content/pkg/CHRG-115hhrg31367/html/CHRG-115hhrg31367.htm>; for the Middle East Forum's reporting, see Lomax, Adam. "Islamic Relief Banned from Rohingya Relief Effort." Middle East Forum, October 24, 2017. <https://web.archive.org/web/20230812175140/https://www.meforum.org/6978/islamic-relief-banned-from-rohingya-relief-effort>.
- 91 Marie Juul Petersen and Victoria Palmer have both conducted fieldwork at Islamic Relief project sites in Bangladesh. See Petersen, Marie Juul. *For Humanity or for the Umma? Aid and Islam in Transnational Muslim NGOs*. London, UK: Hurst & Company, 2015, 117-118; Palmer, Victoria. "Analysing Cultural Proximity: Islamic Relief Worldwide and Rohingya Refugees in Bangladesh." *Development in Practice* 21, no. 1 (February 1, 2011): 96-108; For a recent IRUSA project approved in Bangladesh, see "NGO Portal Satkhira – NGO Portal Satkhira." Accessed September 15, 2023. <https://ngosatkhira.gov.bd/index.php/home/allprojects/31>; For an example of recent work by Islamic Relief Bangladesh delivering aid to Rohingya refugees, see Business Insider Bangladesh. "Almost 3000 Shanties Damaged, but Rohingya Camps Spared the Worst of Mocha," May 15, 2023. <https://www.businessinsiderbd.com/bangladesh/news/35899/almost-3000-shanties-damaged-but-rohingya-camps-spared-the-worst-of-mocha>.
- 92 Middle East Forum. "Writings by Jonathan Schanzer." Accessed September 13, 2023. <https://web.archive.org/web/20230323203024/https://www.meforum.org/author/Jonathan+Schanzer>.
- 93 *Following the Money: Examining Current Terrorist Financing Trends and the Threat to the Homeland, Before the Subcommittee on Counterterrorism and Intelligence of the Committee on Homeland Security*, 114th Congress, May 12, 2016. <https://www.govinfo.gov/content/pkg/CHRG-114hhrg22761/html/CHRG-114hhrg22761.htm>.
- 94 Israel Imperiled: Threats to the Jewish State, Before the House Foreign Affairs Committee Subcommittee on Terrorism, Nonproliferation, and Trade and the Subcommittee on the Middle East and North Africa, 114th Congress, (2016) (statement of Jonathan Schanzer). <https://docs.house.gov/meetings/FA/FA18/20160419/104817/HHRG-114-FA18-Wstate-Schanzer-J-20160419.pdf>.
- 95 Naylor, R.T. *Satanic Purses: Money, Myth, and Misinformation in the War on Terror*. McGill-Queen's University Press, 2006, 224-226; also, Piers, Matthew J. "Malevolent Destruction of a Muslim Charity: A Commentary on the Prosecution of Benevolence International Foundation." *Pace Law Review* 25, no. 2 (April 1, 2005): 339; see also "Government Actions Toward Chicago-Area Islamic Charities." Chicago, IL: Illinois Advisory Committee to the U.S. Commission on Civil Rights, May 2003. <https://www.usccr.gov/files/pubs/sac/il0503/il0503.pdf>.
- 96 Lichtblau, Eric. "Threats and Responses: The Money Trail; US Indicts Head of Islamic Charity in Qaeda Financing." *The New York Times*, October 10, 2002, sec. US <https://www.nytimes.com/2002/10/10/us/threats-responses-money-trail-us-indicts-head-islamic-charity-qaeda-financing.html>; O'Connor, Matt, and Laurie Cohen. "Charity Boss Gets 11 Years." *Chicago Tribune*, August 19, 2003. <https://www.chicagotribune.com/news/ct-xpm-2003-08-19-0308190227-story.html>. For judicial deference to Treasury designations, see Chachko, Elena. "Due Process Is in the Details: U.S. Targeted Economic Sanctions and International Human Rights Law." *AJIL Unbound* 113 (2019): 157-62.
- 97 *The Washington Post*. "US Campaign Produces Few Convictions on Terrorism Charges." June 12, 2005. <http://www.washingtonpost.com/wp-dyn/content/article/2005/06/11/AR2005061100381.html>.
- 98 For the letter, see Stern, Sarah, Brigitte Gabrielle, Andrew S. Borans, Helen Freedman, Judy Freedman Kadish, Charles Jacobs, Fred Fleitz, et al. "Letter to Speaker Nancy Pelosi and Chairman Eliot Engel," March 4, 2019. <https://scharinteragmu.wpengine.com/wp-content/uploads/2023/12/EMET-letter-to-Pelosi-Engel-re-Ilhan-Omar.pdf>; see also Hussain, Murtaza. "Trump Cited a Letter Against Ilhan Omar Signed by Far-Right, Anti-Muslim Groups." *The Intercept*, March 5, 2019. <https://theintercept.com/2019/03/05/ilhan-omar-letter-trump-islamophobia-anti-muslim/>.
- 99 Stern, Sarah, Brigitte Gabrielle, Andrew S. Borans, Helen Freedman, Judy Freedman Kadish, Charles Jacobs, Fred Fleitz, et al. "Letter to Speaker Nancy Pelosi and Chairman Eliot Engel," March 4, 2019. <https://scharinteragmu.wpengine.com/wp-content/uploads/2023/12/EMET-letter-to-Pelosi-Engel-re-Ilhan-Omar.pdf>.
- 100 Stern et al., "Letter to Speaker Nancy Pelosi."



In December 2018, Husain Haqqani, a former Pakistan Ambassador to the US and a Senior Fellow at the Hudson Institute and the UAE's Anwar Gargash Diplomatic Academy, hosted Sam Westrop of the Middle East Forum and Abha Shankar of the Investigative Project on Terrorism at the Hudson Institute.<sup>101</sup> With opening remarks delivered by Rep. Jim Banks (R-IN), this event permitted Westrop and Shankar, the most prolific authors of information manipulation attacks on Muslim-led humanitarian INGOs, to inject false and misleading narratives about Muslim-led humanitarian INGOs into DC policy spaces. In September 2020, Haqqani hosted an event where Ellie Cohanim, then-Deputy Special Envoy to Monitor and Combat Anti-Semitism at the State Department, made a series of erroneous statements that misrepresented the situation surrounding the serious misconduct of two Islamic Relief trustees and a senior executive (*see the case study on Islamic Relief in Section 6.1*).

In the sections that follow, we present case studies of the two most prolific *generators* identified in this research. The Middle East Forum (MEF) and the Investigative Project on Terrorism (IPT) have both been in existence for several decades and are built around the prevailing political interests of their respective founders, Daniel Pipes and Steven Emerson.

### 2.2.3 Case Study: The Middle East Forum

The Middle East Forum (MEF) was founded by Daniel Pipes in 1994. Pipes has told interviewers that he has “the simple politics of a truck driver, not the complex ones of an academic. My viewpoint is not congenial with institutions of higher learning.”<sup>102</sup> This report argues that legitimate contributory expertise necessitates good faith engagement with the society of specialists in the cumulative body of knowledge in relevant academic disciplines.<sup>103</sup> Collins (2014) refers to this as “interactional expertise” – or the expertise developed by immersion in, and engagement with, a

Defamation laws in the US (including high bars for plaintiffs in terms of evidentiary standards in these cases) can severely limit the ability of organizations and individuals that are attacked by information manipulators to pursue legal remedies. Information manipulators aggressively champion absolutist interpretations of free speech as it provides essential cover for their anti-Muslim vitriol. By contrast, the burden of proof in defamation cases in the UK and Canada has made these countries venues where the courts can contribute to disrupting information manipulation campaigns.

In 2023, Islamic Relief Canada won a settlement over a set of publications that falsely claimed it was a “front” to fund terror groups abroad. Raheel Raza, her husband, and four others were defendants in the \$2.5-million lawsuit. As part of the settlement, Raza and her co-defendants issued a statement of clarification acknowledging their statements about Islamic Relief were “unfounded” and that they “did not exercise sufficient due diligence in researching, drafting and/or publishing the defamatory statements.”<sup>104</sup>

community of specialists.<sup>105</sup> However, open disdain for academia permeates the organizational culture of the Middle East Forum. Its executives and content producers have a long history of engaging in open confrontation and *ad hominem* attacks against academics and academia.<sup>106</sup> For more than two decades, Pipes has waged a campaign against the Middle East Studies Association (MESA).<sup>107</sup> This campaign produced MEF’s “Campus Watch” project that has been seen by its critics as an assault on academic freedom by attempting to blacklist, harass, or otherwise intimidate scholars critical of Israel.<sup>108</sup>

MEF is also hostile to a wide array of humanitarian NGOs.<sup>109</sup> It funds and champions NGO Monitor, an Israeli “watchdog” group that has a history of engaging in information manipulation campaigns to delegitimize and undermine the activities of humanitarian and

101 See, for example, “Stability, Democracy, and Islamism in Bangladesh.” The Hudson Institute, December 13, 2018. <https://www.hudson.org/events/1640-stability-democracy-and-islamism-in-bangladesh122018>.

102 Tassel, Janet. “Militant about ‘Islamism.’” *Harvard Magazine*, February 2005. <https://www.harvardmagazine.com/2005/01/militant-about-islamism.html>.

103 Collins, Harry M. *Are We All Scientific Experts Now?* New Human Frontiers Series. Cambridge, UK: Polity, 2014.

104 Nasser, Shanifa. “Canadian Muslim Charity Wins ‘milestone’ Settlement after Being Falsely Accused of Funding Terrorism.” *CBC News*, June 9, 2023. <https://www.cbc.ca/news/canada/toronto/islamic-relief-muslim-charity-canada-terror-1.6870177>.

105 Collins, *Are We All Scientific Experts Now?*

106 For examples, see Pipes, Daniel. “[Campus Watch and] Saving Mideast Studies.” Daniel Pipes, September 18, 2003. <https://www.danielpipes.org/1251/campus-watch-and-saving-mideast-studies>; Westrop, Sam. “Review of Islam on Campus: Contested Identities and the Cultures of Higher Education in Britain.” *Middle East Quarterly*, January 1, 2022. <https://web.archive.org/web/20230206224950/https://www.meforum.org/62825/a-study-in-delusion-and-irrelevance>.

107 “The MESA Debate: The Scholars, the Media, and the Middle East.” *Journal of Palestine Studies* 16, no. 2 (January 1, 1987): 85–104.

108 Lewin, Tamar. “Web Site Fuels Debate on Campus Anti-Semitism.” *The New York Times*, September 27, 2002. <https://www.nytimes.com/2002/09/27/us/web-site-fuels-debate-on-campus-anti-semitism.html>.

109 See, for example, Smith, Cliff. “Christian Aid Charities Help Radical Islam Lobby Congress.” *Islamist Watch*, July 22, 2020. <https://web.archive.org/web/20230206085850/https://www.meforum.org/islamist-watch/61298/christian-aid-charities-help-radical-islam-lobby>.

human rights organizations, especially those that share information about conditions in the Occupied Territories.<sup>110</sup> NGO Monitor has leveled accusations against Christian Aid, World Vision, *Médecins Sans Frontières* (Doctors without Borders), Save the Children, Oxfam, and other organizations that share information about the conflict's effects.<sup>111</sup> The Policy Working Group, a collective of Israeli ex-diplomats and academics, has argued that NGO Monitor "shirks the transparency it demands of others and disseminates misleading and tendentious information, which it presents as factual in-depth research."<sup>112</sup>

During this research, we assessed MEF's antipathy toward Muslim-led humanitarian INGOs to determine what "operational code"—and observable implications thereof—might provide the most consistent explanation for MEF's behavior. One indication might be found in a statement from MEF's founder, Daniel Pipes, who said in 2001 that "the presence, and increased stature, and affluence, and enfranchisement of American Muslims... will present true dangers to American Jews."<sup>113</sup> In attempting to walk back this statement in 2002, Pipes only solidified his hostility to Muslims:

*I make the same point respectively to audiences of women, gays, civil libertarians, Hindus, Evangelical Christians, atheists, and scholars of Islam, among others, all of whom face "true dangers" as the number of Muslims increases.*<sup>114</sup>

Pipes' concern over the enfranchisement of American Muslims, combined with his surrogates' observation

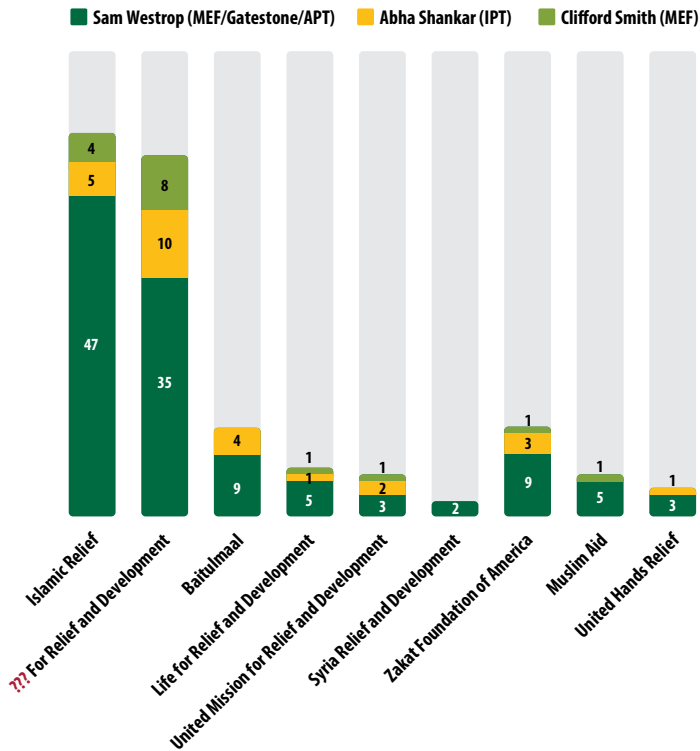
that American Islam's most wealthy organizations are predominantly aid charities, may explain why MEF is devoted to attacking prominent American Muslim-led charities.<sup>115</sup>

MEF's most prolific information manipulator is Sam Westrop who took up his position as the director of MEF's *Islamist Watch* project, in early 2017.<sup>116</sup> Westrop has written more than 50% of all articles that include attacks on Muslim-led humanitarian INGOs. He has written most extensively on both Islamic Relief Worldwide (IRW) and Islamic Relief USA (47 attacks) and Helping Hand for Relief and Development (35 attacks).

Westrop has a documented history of making false and defamatory allegations against prominent British Muslims.<sup>117</sup> While an undergraduate music student at the University of York in the UK, Westrop established a series of organizational fronts for his political activism, including the Institute for Middle Eastern Democracy (2009), Stand for Peace (2010), and the Clean Cash Campaign (2011), among others. Conservative Anglican theologian Adrian Hilton characterized one of Westrop's early attacks on a British Muslim community leader as "sludge-dredging masquerading as theo-political scholarship."<sup>118</sup> Westrop's criticism of prominent British Muslims and community organizations garnered significant coverage across receptive UK media outlets, which Westrop then used to substantiate his standing as an "expert."<sup>119</sup> In late 2012, Westrop started to write for the US-based Gatestone Institute.<sup>120</sup>

- 110 Yaron, Oded. "Aligning Text to the Right: Is a Political Organization Editing Wikipedia to Suit Its Interests?" *Haaretz*, June 17, 2013. <https://www.haaretz.com/2013-06-17/ty-article/premium/the-israeli-editing-wars-on-wikipedia/0000017f-f95b-d044-adff-fbfb3b30000>; also, Yossi Gurvitz, "NGO Monitor's truth warrior", Friends of George Blog, 13 June 2013: <http://www.hahem.co.il/friendsofgeorge/?p=3412> (Hebrew). For MEF's funding of NGO Monitor, see <https://web.archive.org/web/20231117184409/https://www.meforum.org/activities/education-fund/>. See also [http://policyworkinggroup.org.il/report\\_en.pdf](http://policyworkinggroup.org.il/report_en.pdf); Also, Jordan, Lisa, and Peter van Tuijl, eds. *NGO Accountability: Politics, Principles and Innovations*. London, UK: Earthscan, 2006, viii.
- 111 For a complete list of NGO Monitor's profiles of NGOs, see NGO Monitor. "NGOs Archive » NGOmonitor." Accessed September 14, 2023. <https://www.ngo-monitor.org/ngos/>.
- 112 "NGO Monitor: Shrinking Space - Defaming Human Rights Organizations That Criticize the Israeli Occupation." Policy Working Group, September 2018. [http://policyworkinggroup.org.il/report\\_en.pdf](http://policyworkinggroup.org.il/report_en.pdf).
- 113 Pipes, Daniel. "A French Lesson for Tom Harkin." Daniel Pipes, January 5, 2004. <https://web.archive.org/web/20230321151500/https://www.danielpipes.org/1414/a-french-lesson-for-tom-harkin>.
- 114 Pipes, "A French Lesson for Tom Harkin."
- 115 In an MEF article titled "The Economics of American Islam," Sam Westrop asserts that "It is not particularly surprising that American Islam's most wealthy organizations are predominantly aid charities." <https://web.archive.org/web/20230204015908/https://www.meforum.org/62997/the-economics-of-american-islam>.
- 116 Current MEF projects include *Campus Watch*, *Islamist Watch*, *Israel Victory Project*, *The Legal Project*, and *The Washington Project*.
- 117 For examples, see Carter-Ruck. "CEO and Founder of Islam Channel Awarded £140,000 in Libel Damages over False Terrorism Allegation." Accessed September 14, 2023. <https://www.carter-ruck.com/news/ceo-and-founder-of-islam-channel-awarded-140000-in-libel-damages-over-false-terrorism-allegation/>; Sharman, Alice. "Muslim Charities Forum 'Shocked and Dismayed' over Terror Link Allegations." *Civil Society*, September 24, 2014. <https://www.civilsociety.co.uk/news/muslim-charities-forum--shocked-and-dismayed--over-terror-link-allegations.html>.
- 118 In 2014, in an article published by the Gatestone Institute, Westrop attacked the late Fuad Nahdi, a widely respected voice in efforts to tackle extremism in Britain. See Adrian Hilton's critique of Westrop's attack on Nahdi here: Archbishop Cranmer. "General Synod to Be Addressed by Muslim Extremist... Not," November 17, 2014. Internet Archive. <https://web.archive.org/web/20160503094050/http://archbishopcranmer.com/general-synod-to-be-addressed-by-muslim-extremist-not/>.
- 119 A search of the NexisUni database records Westrop's first media appearance as a spokesman for an organization called "Stop the Bomb coalition" quoted by the *Jerusalem Post*. See "Europe-wide protests against Swiss failure to uphold Iran sanctions. Israel slams energy giant EGL for ignoring sanctions." *Jerusalem Post*, October 13, 2010. NexisUni. Westrop's expertise appears to be substantiated by the willingness of receptive press outlets to quote him on the record as a spokesperson for a variety of short-lived organizations, such as the Clean Cash Campaign, the Institute for Middle East Democracy, Stand for Peace, and others, as he was an undergraduate in the music program at the University of York. See Wachmann, Doreen. "Only 22, but Sam Leads Fight against the Israel Bashers." *Jewish Telegraph*, 2011. [https://www.jewishtelegraph.com/prof\\_129.html](https://www.jewishtelegraph.com/prof_129.html).
- 120 Gatestone Institute. "Writings by Samuel Westrop (View Biography)." Accessed September 14, 2023. <https://web.archive.org/web/20230214202157/https://www.gatestoneinstitute.org/author/Samuel+Westrop>.

**FIGURE 3**  
**Three most prolific manipulators of information with the number of attacks on the top 9 Muslim-led humanitarian INGOs by each published on host institution websites between 2013 and 2023.** *Note that many articles include attacks on multiple charities and that attacks are often repeated.*



In September 2014, Camilla Turner of the *Daily Telegraph* published a story about the Muslim Charities Forum (MCF)—an umbrella organization for UK-based Muslim-led charities—based on manipulated information that Sam Westrop had published on his Stand for Peace website. *Daily Telegraph* quoted Westrop, who claimed that the MCF had “links to a group alleged to fund Hamas and the Muslim Brotherhood political movement.”<sup>121</sup> Westrop denounced government funding for the MCF as “madness,” and accused the UK government of “enabling and funding” extremism.<sup>122</sup> However, Westrop had no direct evidence against the MCF itself. His accusations were based on claims that some members of the MCF had been members of the Union of Good, an international umbrella organization of charities designated as a terrorist organization by the US Treasury Department in November 2008. The charities vigorously denied the claim.<sup>123</sup>

Shaken by this attack, the MCF asked the *Daily Telegraph* for a correction for labeling them an “extremist group.” On October 3, 2014, the print edition of the *Telegraph* included a correction on the inside fold of page 2. However, the consequences of the *Telegraph’s* article were harsh, resulting in a funding withdrawal and sully the reputation of the Muslim Charities Forum and its members. The UK government’s Department of Communities and Local Government (DCLG) ceased its funding of the MCF, citing “allegations made in the press.”<sup>124</sup> Only the *Telegraph*, using Westrop as a source, had carried this story.<sup>125</sup> A retrospective investigation by the UK’s Charity Commission, which regulates British Charities, cleared the MCF’s member charities of links to “extremism.”<sup>126</sup>

- 121 Debates over the activities of the Union of Good have played out in academic circles with ethnographer Jonathan Benthall emphasizing that the Union of Good “appears to operate openly... and confine itself to humanitarian aid,” while Matthew Levitt interprets it as having effectively provided material support to Hamas. This difference of interpretation reflects a divide between European and US governments over how to respond to the humanitarian needs of Palestinian society. Benthall, Jonathan. *Islamic Charities and Islamic Humanism in Troubled Times*. Manchester: Manchester University Press, 2016, Chapter 5, note 39; Levitt, Matthew. *Hamas: Politics, Charity, and Terrorism in the Service of Jihad*. New Haven, CT: Yale University Press, 2006, 160.
- 122 DCLG Withdraws £140,000 Funding from Muslim Charities Forum.” *Third Sector*. Accessed September 14, 2023. [https://www.thirdsector.co.uk/article/1327607?utm\\_source=website&utm\\_medium=social](https://www.thirdsector.co.uk/article/1327607?utm_source=website&utm_medium=social).
- 123 May, Samantha. “Muslim Charity in the United Kingdom: Between Counter-Terror and Social Integration.” *The British Journal of Politics and International Relations*, January 26, 2023.
- 124 May, “Muslim Charity in the United Kingdom.”
- 125 A search of the NexisUni database records Westrop’s first media appearance as a spokesman for an organization called “Stop the Bomb coalition” quoted by the *Jerusalem Post*. See “Europe-wide protests against Swiss failure to uphold Iran sanctions. Israel slams energy giant EGL for ignoring sanctions.” *Jerusalem Post*. October 13, 2010. NexisUni. Westrop’s expertise appears to be substantiated by the willingness of receptive press outlets to quote him on the record as a spokesperson for a variety of short-lived organizations, such as the Clean Cash Campaign, the Institute for Middle East Democracy, Stand for Peace, and others, while an undergraduate in the music program at the University of York. See Wachmann, Doreen. “Only 22, but Sam Leads Fight against the Israel Bashers.” *Jewish Telegraph*, 2011. [https://www.jewishtelegraph.com/prof\\_129.html](https://www.jewishtelegraph.com/prof_129.html).
- 126 Gatestone Institute. “Writings by Samuel Westrop (View Biography).” Accessed September 14, 2023. <https://web.archive.org/web/20230214202157/https://www.gatestoneinstitute.org/author/Samuel+Westrop>.

In 2016, Westrop relocated from his native UK to Boston as he was being sued for defamation by Mohammed Ali Harrath, CEO and founder of the Islam Channel, a British TV station.<sup>127</sup> Westrop had falsely alleged that Harrath was a “convicted terrorist.”<sup>128</sup> While Harrath pressed for a negotiated solution to his defamation claim, Westrop and his solicitors insisted that the proceedings move ahead.<sup>129</sup> Westrop’s solicitors initially mounted a “truth” defense but were later forced to acknowledge that this was unsustainable.<sup>130</sup> The judge ordered Westrop to pay £140,000 in libel damages to Harrath, stating that “the sum awarded should be such as to leave interested onlookers in no doubt as to the baselessness of the Defendants’ charge against him.”<sup>131</sup> However, Westrop’s solicitors informed the court that neither he nor Stand for Peace had assets in the UK and therefore could not pay costs or damages.<sup>132</sup> Westrop’s colleagues at MEF now deceptively claim that Harrath’s case was an instance of “Islamist lawfare,” although court documents demonstrate that it was Westrop who insisted that the legal proceedings move forward.<sup>133</sup>

### 2.2.4 Case Study: The Investigative Project on Terrorism

The Investigative Project on Terrorism (IPT) was founded by Steven Emerson in 1993. Emerson is frequently featured on both Daniel Pipes’ and the Middle East Forum’s websites.<sup>134</sup> The Middle East Forum is also one of IPT’s funders. Emerson has a decades-long history of making inflammatory, false and/or misleading statements to media. In his books and TV appearances, Emerson often claims to have

special access to inside information, whether from the FBI or other US agencies.<sup>135</sup> The *Jerusalem Post* has reported that Emerson has “close ties to Israeli intelligence.”<sup>136</sup>

Emerson’s *modus operandi* is to manipulate information to launch attacks on Arabs, Muslims, and Pakistan. However, his ability to access mainstream media has been challenged in recent years by cumulative credibility issues. Some of the more egregious examples include:

- In 1995, Emerson claimed on CBS News that the Oklahoma City bombing “was done with the intent to inflict as many casualties as possible,” which he asserted was “a Middle Eastern trait.” In the same interview, Emerson claimed that “Oklahoma City [is] one of the largest centers of Islamic radical activity outside the Middle East”<sup>137</sup> The actual perpetrator of the Oklahoma City bombing was Timothy McVeigh, an anti-government militant with no connection to Islam.
- In 1997, Associated Press reporters accused Emerson of fabricating a dossier, which he claimed contained purported FBI documents that detailed American Muslim organizations with alleged “terrorist sympathies.” During the investigation, an AP reporter discovered an earlier, nearly identical, document that Emerson had created, raising serious concerns about the authenticity of the FBI dossier. According to AP project lead Richard Cole, “[Emerson] had edited out all phrases [and] taken out anything that made it look like his.”<sup>138</sup>

127 Warby, Mr. Justice. Mohamed Ali Harrath v (1) Stand for Peace Ltd (2) Samuel Westrop (High Court Queen’s Bench Division March 30, 2017). [https://www.carter-ruck.com/images/uploads/documents/Harrath-v-\(1\)Stand\\_for\\_Peace-\(2\)Westrop-Judgment.pdf](https://www.carter-ruck.com/images/uploads/documents/Harrath-v-(1)Stand_for_Peace-(2)Westrop-Judgment.pdf)

128 Harrath, a political dissident under the repressive Ben Ali regime, had been imprisoned and tortured on several occasions before fleeing Tunisia by walking over the border to Algeria and eventually landing in the UK. The Tunisian authorities subsequently convicted Harrath of “membership of an unlawful organization” in absentia. After the overthrow of the Ben Ali regime, Harrath’s conviction was expunged under the terms of an amnesty. The Harrath story reveals a genre of smear that recurs in Westrop’s canon. He routinely overweighs the judicial processes of states whose legal proceedings often fail to meet international standards. See Harrath vs. Stand for Peace Ltd. and Anor, No. [2016] EWHC 665 (QB) (England & Wales High Court (Queen’s Bench Division) April 6, 2016). <https://www.casemine.com/judgement/uk/5a8ff7c460d03e7f57eb1ee2>

129 Harrath vs. Stand for Peace Ltd. and Anor, No. [2016] EWHC 665 (QB) (England & Wales High Court (Queen’s Bench Division) April 6, 2016). <https://www.casemine.com/judgement/uk/5a8ff7c460d03e7f57eb1ee2>

130 Harrath vs. Stand for Peace Ltd., England & Wales High Court.

131 “Founder of the Islam Channel Awarded £140,000 in Libel Damages.” 5RB Barristers, April 19, 2017. <https://www.5rb.com/defamation-2/founder-islam-channel-awarded-140000-libel-damages/>.

132 Westrop dissolved Stand for Peace in June 2017: “STAND FOR PEACE LIMITED Overview.” Accessed September 14, 2023. <https://find-and-update.company-information.service.gov.uk/company/07666073>.

133 Smith, Clifford, and Martha Lee. “Islamist Lawfare.” *Islamist Watch*, December 3, 2020. <https://web.archive.org/web/20230128004832/https://www.meforum.org/islamist-watch/61832/islamist-lawfare>; for the relevant court document, see Harrath vs. Stand for Peace Ltd. and Anor, No. [2016] EWHC 665 (QB) (England & Wales High Court (Queen’s Bench Division) April 6, 2016). <https://www.casemine.com/judgement/uk/5a8ff7c460d03e7f57eb1ee2>.

134 In July 2023, a search for Steven Emerson on Daniel Pipes’ personal website produced 100 results and a search on the Middle East Forum website produced 84 results.

135 For a good example of this, see “Steven Emerson on the Boston Marathon Bombing, Part 1.” *Washington Journal*. Washington, DC: C SPAN, April 16, 2013. <https://www.c-span.org/video/?312142-7/steven-emerson-boston-marathon-bombing-part-1>. Emerson first four books are *The American House of Saud: The Secret Petrodollar Connection* (1985), *Secret Warriors: Inside the Covert Military Operations of the Reagan Era* (1988), *The Fall of Pan Am 103: Inside the Lockerbie Investigation* (1990), and *Terrorist: The Inside Story of the Highest-Ranking Iraqi Terrorist Ever to Defect to the West* (1991).

136 Rodan, Steve. “The Long, Threatening Shadow from Teheran.” *The Jerusalem Post*, September 2, 1994. NexisUni.

137 “Interview with Steven Emerson.” New York, NY: CBS News, April 19, 1995.

138 “Steven Emerson’s Crusade: Why Is a Journalist Pushing Questionable Stories from behind the Scenes?” New York, NY: Fairness & Accuracy in Reporting, January 1, 1999. <https://fair.org/extra/steven-emersons-crusade/>

- In 1999, Emerson attempted to drum up media interest in a story that Pakistan was planning a nuclear first strike on India based on a source that it was later determined was not a defecting nuclear scientist but a “low-level accountant at a company that makes bathroom fixtures.”<sup>139</sup>
- On April 16, 2013, in an interview with C-SPAN, Emerson cast additional suspicion on a “Saudi national” who was injured in the 2013 Boston Marathon bombing, based on “certain classified information” he claimed to be “privy to.”<sup>140</sup> The Saudi national had initially been erroneously identified as a suspect in *The New York Post* the prior day.<sup>141</sup> During the interview, Emerson stated that “the burns on his skin matched the explosive residue of the bomb that exploded,” which of course would be expected given that he was a victim of the bombing.<sup>142</sup> Emerson subsequently told *Fox News* that the “Saudi suspect” had been deported by the Obama administration to “appease” Saudi Arabia.<sup>143</sup> In response to questioning about this allegation, Homeland Security Secretary Janet Napolitano told a House panel that the reports were not true.<sup>144</sup>
- In 2015, Emerson claimed that there are “no-go zones” in European cities where “governments... don’t exercise any sovereignty.”<sup>145</sup> He claimed that “there are actual cities like Birmingham that are totally Muslim where non-Muslims just simply don’t

go in.”<sup>146</sup> In response, British Conservative Prime Minister David Cameron called Emerson “a complete idiot.”<sup>147</sup> Emerson attributed his “mistake” to “sloppy research that had not been fact-checked” but was not able to tell interviewers where the information had come from.<sup>148</sup>

With Emerson retreating from the spotlight, surrogates such as Abha Shankar and John Rossomando have continued his work in the anti-Muslim information manipulation space.

Shankar started working for IPT in 2005 and is its most prolific author of attacks on Muslim-led humanitarian INGOs. She is currently listed as IPT’s Research Director but has also held the role of Senior Intelligence Analyst. Shankar has a Ph.D. in Philosophy and International Relations from Jawaharlal Nehru University and an M.A. in International Relations and Security Studies from Georgetown University. The journalist listing site Muck Rack lists Shankar as having written for *The Diplomat Magazine*, *Arutz Sheva/Israel National News*, *Algemeiner Journal*, *Jewish News Service*, *Sunday Guardian Live* (India), *Family Security Matters* (a CSP project), *The Jewish Voice*, and *Weekly Blitz*.<sup>149</sup> Shankar’s content reflects Emerson’s efforts to boost hardline Israeli and Indian perspectives and attack perceived threats to both. Shankar co-authors and appears at DC-area panels with her counterparts at MEF and they routinely link to each other’s content.<sup>150</sup>

139 Gannon, Kathy. “Pakistani’s Tale and Credentials Are Called Fake.” *Associated Press*. July 3, 1998.

140 “Steven Emerson on the Boston Marathon Bombing, Part 1.” *Washington Journal*. Washington, DC: C SPAN, April 16, 2013. <https://www.c-span.org/video/?312142-7/steven-emerson-boston-marathon-bombing-part-1>.

141 Willis, Oliver. “NY Post Settles Lawsuit Over Infamous Boston Bombing ‘Bag Men’ Cover.” *Media Matters for America*, October 1, 2014. <https://www.mediamatters.org/new-york-post/ny-post-settles-lawsuit-over-infamous-boston-bombing-bag-men-cover>.

142 “Steven Emerson on the Boston Marathon Bombing, Part 1.” *Washington Journal*. Washington, DC: C SPAN, April 16, 2013. <https://www.c-span.org/video/?312142-7/steven-emerson-boston-marathon-bombing-part-1>.

143 The *ad hoc* rescue fallacy involves making up excuses as to why one’s belief could still be true, and is still true, even though there is no evidence to support it. See McSmith, Andy. “Chastened Fox News Pundit Steven Emerson Has Been Wrong Before.” *The Independent*, January 12, 2015, sec. News. <https://www.independent.co.uk/news/people/not-the-first-time-chastened-fox-news-pundit-steven-emerson-has-been-wrong-before-9973526.html>.

144 Yager, Julian Pecquet and Jordy. “Saudi Student Hurt in Boston Bombing Not a Suspect, Not Being Deported.” *Text. The Hill* (blog), April 18, 2013. <https://thehill.com/policy/international/294839-saudi-student-hurt-in-bombing-not-a-suspect-not-being-deported/>.

145 Emerson, Steven. “Emerson with Judge Pirro: No-Go Islamic Zones and Western Self-Denial.” *The Investigative Project on Terrorism*. Accessed September 15, 2023. <https://web.archive.org/web/20230815200442/https://www.investigativeproject.org/4730/emerson-with-judge-pirro-no-go-islamic-zones>.

146 Emerson, “Emerson with Judge Pirro.”

147 Holehouse, Matthew. “David Cameron: US Terror ‘expert’ Steve Emerson Is a ‘Complete Idiot.’” *The Telegraph*, January 12, 2015. <https://www.telegraph.co.uk/news/uknews/terrorism-in-the-uk/11340399/David-Cameron-US-terror-expert-Steve-Emerson-is-a-complete-idiot.html>.

148 “Apology for ‘Muslim Birmingham’ Fox News Claim.” London, UK: BBC News, January 12, 2015. <https://www.bbc.com/news/uk-england-30773297>.

149 Muck Rack. “Abha Shankar.” Accessed September 14, 2023. <https://muckrack.com/abha-shankar>.

150 For examples of MEF and IPT co-authored articles attacking Muslim-led humanitarian INGOs, see Shankar, Abha, and Sam Westrop. “Bangladeshi Islamists Go to Washington.” *Middle East Forum*, September 24, 2018. <https://web.archive.org/web/20230206193051/https://www.meforum.org/7547/bangladeshi-islamists-go-to-washington>; also Shankar, Abha, and Martha Lee. “Investigation Exposes Terror Ties Behind Islamist Charity’s Humanitarian Facade.” *Middle East Forum*, April 6, 2020. <https://web.archive.org/web/20230331230417/https://www.meforum.org/60664/investigation-exposes-terror-ties-of-islamist-charity>; for an event with Abha Shankar and Sam Westrop (hosted by legitimator Husain Haqqani), see *Stability, Democracy, and Islamism in Bangladesh*. Hudson Institute, 2018. <https://www.hudson.org/events/1640-stability-democracy-and-islamism-in-bangladesh122018>.

# 3.0

# The tools of information manipulation



Analyzing the content and rhetorical techniques of information manipulation campaigns is essential to understanding the misconceptions that result and developing suitable countermeasures.<sup>151</sup> Arranging the information manipulation landscape in a systematic manner enables us to delve deeper into the underlying reasons, gain insights into misconceptions, and identify potential policy ramifications arising from information manipulation. Above all, it establishes a framework for devising methods to debunk false claims. In analyzing the organizational strategies of—and content produced by—the core *generators* of information manipulation, we note commonalities in the tools and techniques that they employ.

It appears that the authors who manipulate information on behalf of the five *generator*

organizations are attempting to flood the information environment to influence media and political audiences. For example, MEF and IPT collaborate to optimize each other's search engine results and reinforce a filter bubble. These collaborations include the cross-posting of articles between MEF and IPT sites, creating the conditions for circular reporting and appeals to false authority by embedding external links to one another's false and/or misleading information, the persistent repetition of dubious or false accusations, and the targeted placement of their content across sympathetic or susceptible media spaces. This use of external linking boosts the receiving domain's search engine optimization (SEO) because major search engines see external links as votes of confidence in the linked webpage, suggesting the content on that page is legitimate and credible.

### 3.1 Information manipulation tactics

<p><b>Manipulator experts</b></p>	<p>Presenting an information manipulator as an “expert,” a legitimate authority on the subject matter, and/or a source of credible information. Manipulator experts hold views that are inconsistent with established knowledge and lack interactional expertise because they refuse to engage with relevant scholarly debates.</p>
<p><b>Shotgun argumentation</b></p>	<p>A rhetorical or debate strategy in which an individual rapidly and haphazardly presents numerous arguments or points, frequently without adequately supporting or explaining each one. Key characteristics of shotgun argumentation include:</p> <ol style="list-style-type: none"> <li>1. <b>Volume of Points:</b> Presenting a series of points or arguments, one after the other, without delving deeply into any of them. This makes it difficult for interlocutors or opponents to respond to each point adequately.</li> <li>2. <b>Rapid and Simplistic Delivery:</b> The arguments are presented quickly and without elaboration, making it challenging for others to fully grasp the nuances of each point or to respond in a comprehensive manner.</li> <li>3. <b>Lack of Evidence:</b> Often, proponents of shotgun argumentation fail to provide sufficient evidence, examples, or sources to support their claims.</li> </ol> <p>Shotgun argumentation can be frustrating for those engaged in a discussion because it can lead to a disjointed and unproductive exchange. It may be used strategically to deflect from a central issue or to create a sense of chaos in a debate. For a good example from the Middle East Forum, see <a href="#">here</a>.</p>

<sup>151</sup> In this section, we draw on previous academic work on the rhetoric of the oil and tobacco lobby's denialism, see Cook, John, Ullrich Ecker, and Stephan Lewandowsky. “Misinformation and How to Correct It.” In *Emerging Trends in the Social and Behavioral Sciences*, edited by Robert A Scott and Stephan M Kosslyn, 1st ed., 1–17. Wiley, 2015; Cook, John. “A History of FLICC: The 5 Techniques of Science Denial,” March 21, 2020. <https://skepticalscience.com/history-FLICC-5-techniques-science-denial.html>.

### 3.1 Information manipulation tactics (continued)

Use of circular reporting	Definition	Example
	<p>Circular reporting refers to a situation where a piece of information is reported by multiple sources that ultimately rely on the same initial—often unverified—single source. The production of multiple sources creates opportunity for false corroboration where a piece of information is not independently verified by multiple distinct sources but is instead propagated through a chain of interconnected or dependent sources. The Middle East Forum</p> <ul style="list-style-type: none"> <li>• cites across its various projects, such as “Focus on Western Islamism” and “Islamist Watch.”</li> <li>• Cross posts to—or cites—other <i>generators</i> such as IPT.</li> <li>• Places content in sympathetic or unsuspecting domestic or international media.</li> </ul> <p>These activities create the illusion of corroboration of poorly sourced information.</p>	<p><b>Example</b></p> <p>“Sponsors of the HHRD event in Pakistan included the Falah-i-Insaniat Foundation (FIF), the charitable wing of Lashkar-e-Taiba, the terrorist organization responsible for the 2008 Mumbai attacks.”</p> <p>—Sam Westrop, Middle East Forum.<sup>152</sup></p> <p>Variants of this claim, which involves the manipulation of low-quality source material, have been repeated by <i>generators</i> and disseminated widely in US and Indian media, including in critiques of</p> <ul style="list-style-type: none"> <li>• The Trump administration<sup>153</sup></li> <li>• USAID<sup>154</sup></li> <li>• Pakistan’s then-Ambassador designate to the US, Masood Khan<sup>155</sup></li> <li>• Rep. Ilhan Omar (D-MN)<sup>156</sup></li> <li>• Conservatives allying with Islamists.<sup>157</sup></li> </ul>
<p><b>Flooding the Information Environment</b></p>	<p>A deliberate and often malicious strategy of overwhelming a communication channel, platform, or online space with a high volume of information, often with the intent to disrupt, confuse, or manipulate. Flooding the information environment often involves the deliberate and repetitive spread of manipulated information. The goal may be to confuse, sow discord, or advance a particular agenda. It can be used as a tactic to manipulate public opinion, shape narratives, or create chaos in online discussions and debates. By flooding the information space, malicious actors may seek to influence how people perceive events, issues, or political developments. In some cases, flooding the information environment can exploit existing echo chambers or filter bubbles, where individuals are already exposed to information that aligns with their preexisting beliefs. When these spaces are saturated with reinforcing content, it can further polarize and radicalize individuals.</p>	

152 Westrop, Sam. “American Islamist Charity Openly Partners with Designated Terrorists.” Middle East Forum, January 4, 2018. <https://web.archive.org/web/20221208104725/https://www.meforum.org/7144/american-islamist-charity-partners-with-terrorists>.

153 Westrop, Sam. “Trump’s Curious Pro-Islamist Legacy.” Middle East Forum, January 29, 2021. <https://web.archive.org/web/20230331040909/https://www.meforum.org/61974/trump-curious-pro-islamist-legacy>.

154 *The Times of India*. “USAID Grantee in Pakistan Associated with Designated Terrorist Organisations, Alleges Congressman.” January 27, 2023. <https://timesofindia.indiatimes.com/world/us/usaaid-grantee-in-pakistan-associated-with-designated-terrorist-organisations-alleges-congressman/articleshow/97363004.cms?from=mdr>.

155 Westrop, Sam. “A Terror Supporter Goes to Washington.” *National Review*, November 15, 2021. <https://www.nationalreview.com/2021/11/a-terror-supporter-goes-to-washington/>.

156 Majumder, Abhijit. “What Is Ilhan Omar’s Visit to Pakistan-Occupied Kashmir Trying to Hide?” *Firstpost*, April 23, 2022, sec. Opinion. <https://www.firstpost.com/opinion/what-is-ilhan-omars-visit-to-pakistan-occupied-kashmir-trying-to-hide-10591351.html>.

157 Westrop, Sam. “A Conservative-Islamist Alliance.” *Focus on Western Islamism* (blog), October 25, 2022. <https://web.archive.org/web/20230804193801/https://islamism.news/research/in-depth-analysis/a-conservative-islamist-alliance/>; also Westrop, Sam. “A Conservative-Islamist Alliance; Part 4: The Right Inches Closer to Islamism.” Middle East Forum, October 25, 2022. <https://web.archive.org/web/20230521084421/https://www.meforum.org/63737/a-conservative-islamist-alliance-part-4-the-right>.



### 3.2 Cognitive biases and manipulations

Cognitive bias occurs because people tend to see what they expect or want to see, and this may drive their analytical decisions in cases of ambiguity. The cognitive manipulations/flaws identified here result from an over-eagerness or deliberate intent

to interpret ambiguous and inconsistent data to fit theories, expectations, and prejudices, a desire to find order and predictability in random data, and/or a difficulty in detecting and correcting biases in incomplete and unrepresentative data.

TECHNIQUE	DEFINITION	EXAMPLE
<b>Conspiratorial thinking</b>	Proposing that a secret plan exists to implement a nefarious scheme and/or ascribing malicious motivations or intent to unexceptional people, organizations, occurrences, or events. This is often accompanied by a “big reveal” where a seemingly good actor is “revealed” to be involved in a nefarious plot.	<p>“...virtually any Muslim American organization in this country of any prominence is a Muslim Brotherhood front” — Frank Gaffney, Center for Security Policy.<sup>158</sup></p> <p>“While IR is involved in genuine charitable work and cultivates influential friends in political and media circles, the charity is a charade, hiding its long history of financing terror and supporting extremism” — Sam Westrop, Middle East Forum.<sup>159</sup></p>
<b>Cherry picking</b>	Carefully selecting data that appear to confirm one position while ignoring other data that contradict that position. Individuals or organizations may engage in cherry picking deliberately to manipulate or deceive others.	<p>“Before founding Zakat Foundation in 2001, Demir worked for the Benevolence International Foundation (BIF)... The Treasury Department designated BIF and related entities as terror financiers in 2002. The Illinois-based BIF and its director, Enaam Arnaout, were charged the same year with misusing charitable contributions to support Al-Qaeda and other terrorist groups overseas” — Abha Shankar and Martha Lee, Investigative Project on Terrorism.<sup>160</sup></p> <p>The Justice Department dropped its case against Benevolence International in 2002, with BIF’s CEO Enaam Arnaout cleared of any connection to terrorism later that year.<sup>161</sup> At the time, US District Judge Suzanne B. Conlon told prosecutors they had “failed to connect the dots” and said there was no evidence that Arnaout “identified with or supported” terrorism.<sup>162</sup></p>

158 “Glenn Beck: Does Imam Behind ‘Ground Zero Mosque’ Want to Bring Shariah Law to America?” Glenn Beck. Fox News, August 23, 2010. <https://www.foxnews.com/story/glenn-beck-does-imam-behind-ground-zero-mosque-want-to-bring-shariah-law-to-america>.

159 “MEF Sentry Radio: The Islamist Threat at Home (Ep. 2).” Accessed September 16, 2023. <https://web.archive.org/web/20230228120408/https://www.meforum.org/7467/mef-sentry-radio-the-islamist-threat-at-home-ep-2>.

160 Shankar, Abha. “Investigation Exposes Terror Ties Behind Islamist Charity’s Humanitarian Facade.” The Investigative Project on Terrorism. Accessed September 16, 2023. <https://web.archive.org/web/20230923010534/https://www.investigativeproject.org/8368/investigation-exposes-terror-ties-behind-islamist>.

161 Lichtblau, Eric. “Threats and Responses: The Money Trail; US Indicts Head of Islamic Charity in Qaeda Financing.” *The New York Times*, October 10, 2002. <https://www.nytimes.com/2002/10/10/us/threats-responses-money-trail-us-indicts-head-islamic-charity-qaeda-financing.html>; O’Connor, Matt, and Laurie Cohen. “Charity Boss Gets 11 Years.” *Chicago Tribune*, August 19, 2003. <https://www.chicagotribune.com/news/ct-xpm-2003-08-19-0308190227-story.html>.

162 *The Washington Post*. “US Campaign Produces Few Convictions on Terrorism Charges.” June 12, 2005. <http://www.washingtonpost.com/wp-dyn/content/article/2005/06/11/AR2005061100381.html>.

### 3.2 Cognitive biases and manipulations (continued)

<p><b>Guilt by association</b></p>	<p>Spuriously connecting target organization(s) to a demonized group of people or a “bad person” to discredit it. Connections are often insignificant, involving individuals happening to be in the same place at the same time. This may also include tying organizations or individuals together with several degrees of separation.</p>	<p><i>“Under the Biden administration, the most alarming grant is \$50,000 from the US Agency for International Development (USAID) to Helping Hand for Relief and Development (HHRD)... and seemingly one of the most dangerous Islamist charities in the United States. In 2017, HHRD openly <u>partnered</u> with the designated Pakistani terror group Lashkar-e-Taiba, which carried out the deadly 2008 Mumbai attacks, in which 166 were murdered”</i>                  — Sam Westrop, Focus on Western Islamism.<sup>163</sup></p> <p>In this article, targeting the Biden administration, Westrop links the administration to <i>Lashkar-e-Taiba</i> across several degrees of separation. As we explain in Section 6.2., HHRD never “partnered” with “<i>Lashkar-e-Taiba</i>.”</p>
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### 3.3 Motivational/Social biases and manipulations

Motivational bias occurs because an analyst has a vested interest in an issue or reaching a particular finding and consciously or unconsciously distorts his or her judgment. It is often compounded by exaggerated perceptions of political and/or social support.

TECHNIQUE	DEFINITION	EXAMPLE
<p><b>The enigma of access to secret information</b></p>	<p>Making grandiose claims about having special access to secrets, classified information, or clandestine sources, particularly when it comes to sensitive matters.</p> <p>Referring to secret evidence can allow a manipulator that lacks evidence to make accusations without having to provide any evidence to support them.</p>	<p><i>“A <u>secret memo</u> to US legislators by the Islamist charity Helping Hand for Relief and Development (HHRD) sought to discredit the research of Sam Westrop...”</i>                  — Clifford Smith and Martha Lee, Middle East Forum.<sup>164</sup></p> <p><i>“I’m not going to go into it because I’m privy to certain classified information...”</i>                  — Steven Emerson, IPT.<sup>165</sup></p>

163 Westrop, Sam. “Federal Government Hands \$5 Million to Radical Islamic Charities in 2021.” Middle East Forum, May 5, 2022. <https://web.archive.org/web/20230204031420/https://www.meforum.org/63213/federal-government-hands-5-million-to-radical>.

164 Smith, Clifford, and Martha Lee. “Islamist Lawfare.” Islamist Watch, December 3, 2020. <https://web.archive.org/web/20230128004832/https://www.meforum.org/islamist-watch/61832/islamist-lawfare>.

165 See “Steven Emerson on the Boston Marathon Bombing, Part 1.” *Washington Journal*. Washington, DC: C SPAN, April 16, 2013. <https://www.c-span.org/video/?312142-7/steven-emerson-boston-marathon-bombing-part-1>.

### 3.3 Motivational/Social biases and manipulations (continued)

TECHNIQUE	DEFINITION	EXAMPLE
<p><b>Smearing by textual colocation</b></p>	<p>Textual colocation of the target organization with a word or expression associated with a negative phenomenon in the recipient's mind (e.g., "extremism," "terrorism," "Islamism," etc.) This technique is based on the exploitation of prejudices and stereotypes, as the label created qualifies the target organization as something that the author's audience finds suspicious or undesirable.</p>	<p><i>"Helping Hand for Relief and Development (HHRD), an Islamist charity..."</i> — Clifford Smith and Martha Lee, Middle East Forum.<sup>166</sup></p> <p><i>"A new Middle East Forum report uncovers the extremism and terror connections of the largest Islamic charity in the western world: Islamic Relief."</i> — Sam Westrop, Middle East Forum.<sup>167</sup></p>
<p><b>Appeal to false authority</b></p>	<p>An appeal to false authority is a logical fallacy in which someone attempts to support or validate a claim, argument, or statement by citing an authority figure or source that lacks the expertise, credibility, or relevance to the topic at hand. In essence, it involves relying on the opinion or endorsement of an individual or source that is not qualified or appropriate to speak on the subject in question.</p>	<p><i>"In 2015, Egyptian prosecutors accused Essam El-Haddad... of using Islamic Relief to fund the Muslim Brotherhood"</i> — Sam Westrop, Middle East Forum.<sup>168</sup></p> <p>This exemplifies an "appeal to false authority." Advocacy groups and human rights NGOs credibly accuse Egyptian prosecutors of engaging in political theater; Human Rights Watch reports that "politicized criminal defamation prosecutions" are a hallmark of President Sisi's Egypt.<sup>169</sup></p>

166 Smith, Clifford, and Martha Lee. "Islamist Lawfare." *Islamist Watch*, December 3, 2020. <https://web.archive.org/web/20230128004832/https://www.meforum.org/islamist-watch/61832/islamist-lawfare>.

167 Westrop, Sam. "Terror-Linked Charity Islamic Relief Escapes Ban on Receiving Your Tax Dollars." *Islamist Watch*, September 21, 2017. <https://web.archive.org/web/20230604204042/https://www.meforum.org/islamist-watch/53720/terror-linked-charity-islamic-relief-escapes-ban>.

168 As IRW's code of conduct forbids trustees to engage in political activities, Essam El-Haddad stepped down as a trustee prior to taking up his position as a foreign policy advisor to the democratically elected Egyptian head of state. El-Haddad was seen by the Obama administration as a trustworthy and competent interlocutor, with President Obama granting El-Haddad an unanticipated and unprecedented 40-minute meeting to discuss political developments in Egypt on Thanksgiving night 2013. See Kirkpatrick, David D. *Into the Hands of the Soldiers: Freedom and Chaos in Egypt and the Middle East*. New York, NY: Viking, 2018, 182. For MEF's interpretation, see Westrop, Sam. "Islamic Relief: Charity, Extremism & Terror." *Middle East Forum*, June 20, 2018. <https://web.archive.org/web/20230926223942/https://www.meforum.org/7403/islamic-relief-charity-extremism-terror>.

169 See PEN America. "Egyptian Prosecutors' Decision to Seek Death Penalty for Photojournalist Shawkan Political Theater at the Expense of Human Rights," March 8, 2018. <https://pen.org/press-release/egypt-death-penalty-photojournalist-shawkan-disregard-human-rights/>; "Egypt: Prosecution of Mada Masr Journalists." *Human Rights Watch*, September 8, 2022. <https://www.hrw.org/breaking-news/2022/09/08/egypt-prosecution-mada-masr-journalists>.

### 3.3 Motivational/Social biases and manipulations (continued)

TECHNIQUE	DEFINITION	EXAMPLE
<b>Temporal/spatial locking</b>	<p>Resistance or refusal to acknowledge that the beliefs and practices of Muslims vary considerably across time and space depending on their position in relation to society, the state, and the broader political environment. This is a variant of a genetic fallacy.</p>	<p><i>“Jamaat-e-Islami is a South Asian equivalent of Egypt’s Muslim Brotherhood. Like the Brotherhood, JI wants to spread Islam until it conquers the world. JI founder Sayyid Abu ‘Ala Maududi wrote that “the objective of the Islamic ‘Jihad’ is to eliminate the rule of an un-Islamic system and establish in its stead (sic) an Islamic system of state rule.”</i></p> <p>— Abha Shankar, IPT.<sup>170</sup></p> <p>This exemplifies temporal/spatial locking because it is premised on the underlying assumption that US-based organizations with weak and informal links to a particular South Asian branch of <i>Jamaat-e-Islami</i> must subscribe to a statement attributed to JI-founder Maududi more than 70 years ago.</p>
<b>Conflation</b>	<p>Combining two distinct ideas as if the items were interchangeable or connected. For example, conflating religious conservatism with “extremism” or conflating “Islam” with “Islamism.”</p>	<p><i>“A few years ago, the UAE designated Islamic Relief as a terror organization”</i></p> <p>— Sam Westrop, Middle East Forum.<sup>171</sup></p> <p>Here, Westrop conflates the UAE’s idiosyncratic definition of “terrorism” with generally accepted definitions.<sup>172</sup> The UAE’s definition permits a range of peaceful expressions of dissent to be labeled “terrorism.” Human rights organizations characterized the UAE’s terrorism legislation as “[having] the potential to be used against peaceful activists and government critics due to the broad ambit of its provisions, their vague definition, and the range of actions that may be considered under the law to amount to terrorism.”<sup>173</sup> In Section 6.1, we outline the circumstances around the UAE’s 2014 designation of several Western civil society organizations as “terrorist organizations” to the surprise of both US and European officials.</p>

170 Shankar, Abha. “IPT Investigation Reveals ICNA Partner’s Close Ties to Kashmiri Jihadists.” The Investigative Project on Terrorism. Accessed September 16, 2023. <https://web.archive.org/web/20230605195420/https://www.investigativeproject.org/7011/ipt-investigation-reveals-icna-partner-close-ties>.

171 Stern, Marilyn. “Sam Westrop on the ‘Sinister’ Mission of Islamic Relief.” Middle East Forum, October 14, 2020. <https://web.archive.org/web/20221127061708/https://www.meforum.org/61650/westrop-on-the-sinister-mission-of-islamic-relief>.

172 For examples of this oft-repeated charge, see Smith, Cliff. “Leading from Behind on Islamic Relief.” Islamist Watch, December 11, 2019. <https://web.archive.org/web/20230328233943/https://www.meforum.org/islamist-watch/60090/leading-from-behind-on-islamic-relief>; Middle East Forum. “The Silicon Valley Community Foundation Must Stop Funding Islamist Hate Groups,” March 1, 2017. <https://web.archive.org/web/20230207075553/https://www.meforum.org/6558/the-silicon-valley-community-foundation-must-stop>.

173 “There Is No Freedom Here: Silencing Dissent in the United Arab Emirates (UAE).” Amnesty International, November 2014, 10. <https://www.amnesty.org/en/documents/mde25/0018/2014/en/>.

### 3.3 Motivational/Social biases and manipulations (continued)

TECHNIQUE	DEFINITION	EXAMPLE
<b>False binaries</b>	An informal fallacy that distills a complex set of options or ideas into two, often wildly exaggerated, mutually exclusive options.	<p><i>"Is the extent of Islamic Relief's extremist ties small enough that a well-meaning bureaucrat might simply be oblivious? Or is this an appalling dereliction of duty that means taxpayers' money is now subsidizing terrorist acts?"</i></p> <p>— Clifford Smith and Sam Westrop, Middle East Forum.<sup>174</sup></p>
<b>"Straw Man" misrepresentations</b>	Mischaracterizing a situation or an opponent's position in such a way as to distort understanding.	<p><i>"In reality, Westrop did not 'falsely' accuse anyone. That a UK court came to such a judgement is a perfect example of successful 'lawfare,' colloquially defined as the 'misuse of legal systems and principles against an enemy, such as by damaging or delegitimizing them, tying up their time or winning a public relations victory"</i></p> <p>— Clifford Smith and Martha Lee, Middle East Forum.<sup>175</sup></p> <p>This is a "straw man" representation because it was Westrop and his solicitors who insisted that the lawsuit proceed. Court documents indicate that Harrath was keen to negotiate a solution.<sup>176</sup> The court ordered Westrop to pay £140,000 in libel damages to Harrath, with the judge stating that "the sum awarded should be such as to leave interested onlookers in no doubt as to the baselessness of the Defendants' charge against him."<sup>177</sup></p>
<b>Use of irrelevant citations</b>	Providing a citation or link that leads to content that is entirely irrelevant to the claim.	<p><i>"...and a Pakistani newspaper report <u>reveals</u> both HHRD and the Falah-i-Insaniat Foundation were working on the same projects"</i></p> <p>— Sam Westrop, Middle East Forum.<sup>178</sup></p>

174 Smith, Clifford, and Sam Westrop. "Trump Administration Continues to Enable and Fund Troubled Islamic Organization." Middle East Forum, December 11, 2019. <https://web.archive.org/web/20230606231309/https://www.meforum.org/60098/trump-administration-funds-islamist-group>.

175 For the article defending Westrop on the Middle East Forum's website, see Smith, Clifford, and Martha Lee. "Islamist Lawfare." Islamist Watch, December 3, 2020. <https://web.archive.org/web/20230128004832/https://www.meforum.org/islamist-watch/61832/islamist-lawfare>.

176 For Westrop's insistence on proceeding with the case, see Paragraph 12: Harrath vs. Stand for Peace Ltd. and Anor, No. [2016] EWHC 665 (QB) (England & Wales High Court (Queen's Bench Division) April 6, 2016). <https://www.casemine.com/judgement/uk/5a8ff7c460d03e7f57eb1ee2>

177 "Founder of the Islam Channel Awarded £140,000 in Libel Damages." 5RB Barristers, April 19, 2017. <https://www.5rb.com/defamation-2/founder-islam-channel-awarded-140000-libel-damages/>.

178 Westrop, Sam. "American Islamist Charity Openly Partners with Designated Terrorists." *Rabwah Times*, January 4, 2018. <https://www.rabwah.net/american-islamist-charity-openly-partners-designated-terrorists%E2%80%A8/>.

### 3.3 Motivational/Social biases and manipulations (continued)

TECHNIQUE	DEFINITION	EXAMPLE
<p><b>Run-on smearing</b></p>	<p>Exploiting the momentum of a previous smear campaign to perpetuate negative portrayals of the target organization.</p>	<p><i>“Helping Hand for Relief and Development (HHRD), an Islamist charity recently called out by a number of Congressmen for ties to terrorism...”</i> — Clifford Smith and Martha Lee. Middle East Forum.<sup>179</sup></p> <p><i>“In 2016, the banking giant HSBC shut down Islamic Relief’s accounts”</i> — Press release, MEF.<sup>180</sup></p> <p>Both examples above involve using the deleterious outcomes of prior smear campaigns to further smear the target organization.</p>
<p><b>Theologocentrism</b></p>	<p>Attributing all organizational behavior and motivations to religion, overlooking or ignoring that people and organizations (1) have multiple identities and complex relationships with faith; (2) are not solely concerned with issues informed by religion but also issues that affect society at large.</p>	<p><i>“...the presence, and increased stature, and affluence, and enfranchisement of American Muslims... will present true dangers to American Jews”</i> — Daniel Pipes, MEF.<sup>181</sup></p> <p>Making the obviously false assertion that a Muslim-run humanitarian INGO operates solely based on an “Islamist” or even “Islamic” identity.<sup>182</sup></p>

179 Smith, Clifford, and Martha Lee. “Islamist Lawfare.” *Islamist Watch*, December 3, 2020. <https://web.archive.org/web/20230128004832/https://www.meforum.org/islamist-watch/61832/islamist-lawfare>.

180 Middle East Forum. “MEF Reveals Islamic Relief under Investigation; Congress Demands Answers,” October 18, 2018. <https://web.archive.org/web/20230606231905/https://www.meforum.org/7281/mef-reveals-islamic-relief-under-investigation>.

181 Pipes, Daniel. “A French Lesson for Tom Harkin.” *Daniel Pipes*, January 5, 2004. <https://www.danielpipes.org/1414/a-french-lesson-for-tom-harkin>.

182 See, for example, Westrop, Sam. “The Economics of American Islam.” *Middle East Forum*, February 4, 2022. <https://web.archive.org/web/20230204015908/https://www.meforum.org/62997/the-economics-of-american-islam>.

# 4.0

## The political network



The use of manipulated information about Muslim-led humanitarian INGOs by members of Congress and the executive branch is particularly harmful because it both legitimates the *generator* and poses a direct threat to the operations of humanitarian INGOs. Even legislation that is withdrawn or dies in committee has an enduring detrimental effect on targeted organizations. Moreover, correspondence originating from congressional offices continues to be part of the public record, and any allegations made accumulate in the public domain.

The timeline of this analysis runs from January 2017 through the present, spanning the 115<sup>th</sup> through the current 118<sup>th</sup> Congresses. With the election of Donald Trump in 2016, and with Republican majorities in the House and Senate, the *generators* saw a political opportunity to gain traction on a policy agenda that included diminishing Muslim-led humanitarian and development aid INGOs.<sup>183</sup> As noted elsewhere in this report, the *generators* started to ramp up their attacks on Muslim-led charities in early 2017, they peaked in 2018 and then fell in 2021. During this time frame, the *generators* and *legitimizers* saw some success in mobilizing political networks on Capitol Hill and in the executive branch.

*Legitimizers*, such as M. Zuhdi Jasser of the American Islamic Forum for Democracy (AIFD) make periodic appearances on the Hill to testify at hearings.<sup>184</sup> Jasser has provided testimony that is not in accord with the broad academic consensus on the inadvisability of designating the Muslim Brotherhood in the United States.<sup>185</sup> In oral testimony before the Subcommittee

on National Security of the Committee on Oversight and Government Reform, Jasser repeated manipulated information generated by MEF and indicated his belief that designating the Muslim Brotherhood as a terrorist group would allow the US Government to prosecute and shut down Islamic Relief USA.<sup>186</sup>

Of the five *generators*, only the Middle East Forum has a registered lobbying presence on Capitol Hill.<sup>187</sup> Between February 2016 and January 2018, MEF lobbied Congress on “Muslim Brotherhood, UNRWA, Israel Victory Project, Countering Violent Extremism, White House Commission on Radical Islam, and Vetting Immigrants.”<sup>188</sup> Between October 2018 and July 2020, MEF engaged an outside firm to lobby on The Homeland and Cyber Threat Act (H.R. 4189), The Palestinian International Terrorism Support Prevention Act of 2019 (H.R. 1850), and provisions related to the United Nations Relief & Works Agency in House Report 115-829.<sup>189</sup>

## 4.1 Manipulated information in the 115<sup>th</sup> and 116<sup>th</sup> Congresses

- In April 2017, four members of Congress introduced H.R. 2058 – the Charity Transparency Act of 2017.<sup>190</sup> The bill seemed to draw on the May 2016 congressional testimony of FDD’s Jonathan Schanzer, a *legitimater*.<sup>191</sup> The bill targeted charities previously “implicated” in terrorist financing and analysts expressed concern about ‘guilt by association’ ramifications.<sup>192</sup> H.R. 2058 was referred to the House Committee on Ways and Means where it died.

183 The author is not in possession of the Middle East Forum’s original document. “Policy Agenda.” Middle East Forum, n.d. [https://scharinteragmu.wpengine.com/wp-content/uploads/2023/12/MEF\\_policy-agenda\\_2021.pdf](https://scharinteragmu.wpengine.com/wp-content/uploads/2023/12/MEF_policy-agenda_2021.pdf).

184 See, for example, US Congress, House, *The Muslim Brotherhood’s Global Threat, Before the Subcommittee on National Security of the Committee on Oversight and Government Reform*, 115th Congress, (2018). <https://www.govinfo.gov/content/pkg/CHRG-115hhrg31367/html/CHRG-115hhrg31367.htm>.

185 For Jasser’s testimony, see US Congress, House, *The Muslim Brotherhood’s Global Threat, Before the Subcommittee on National Security of the Committee on Oversight and Government Reform*, 115th Congress, (2018). <https://www.govinfo.gov/content/pkg/CHRG-115hhrg31367/html/CHRG-115hhrg31367.htm>. For an overview of the broad consensus among experts from across the spectrum on the inadvisability of designating the Muslim Brotherhood, see Bell, Matthew. “Should the Muslim Brotherhood Be Designated a Terrorist Group?” The World from PRX. Accessed September 7, 2023. <https://theworld.org/stories/2017-01-29/should-muslim-brotherhood-be-designated-terrorist-group>.

186 US Congress, House, *The Muslim Brotherhood’s Global Threat, Before the Subcommittee on National Security of the Committee on Oversight and Government Reform*, 115th Congress, (2018). <https://www.govinfo.gov/content/pkg/CHRG-115hhrg31367/html/CHRG-115hhrg31367.htm>.

187 United States Senate Lobbying Disclosure. “Registrant & Client ID Lookup | Lobbying Disclosure.” Accessed September 14, 2023. <https://lda.senate.gov/registrants/public/registrator-client/lookup/?registrator=&client=middle+east+forum&search=search>; ProPublica. “Lobbying Arrangements Results for ‘Middle East Forum.’” <https://projects.propublica.org/represent/lobbying/search?search=middle+AND+east+AND+forum>; ProPublica Represent. “Middle East Forum.” <https://projects.propublica.org/represent/lobbying/r/300929079>; ProPublica Represent. “Lobbying Arrangements Results for ‘Clifford Smith.’” Accessed September 9, 2023. <https://projects.propublica.org/represent/lobbying/search?search=Clifford+AND+Smith>.

188 ProPublica. “Lobbying Arrangements Results for ‘Middle East Forum.’” <https://projects.propublica.org/represent/lobbying/search?search=middle+AND+east+AND+forum>.

189 ProPublica Represent. “Middle East Forum.” Accessed September 9, 2023. <https://projects.propublica.org/represent/lobbying/r/301019329>.

190 The cosponsors of H.R. 2058 were Representatives Ted Poe (R-TX), Randy Weber (R-TX), Paul Cook (R-CA), and Scott Perry (R-PA). US Congress, House, *Charity Transparency Act of 2017*. HR 2058, 115th Congress, Introduced in House April 6, 2017. <https://www.congress.gov/115/bills/hr2058/BILLS-115hr2058ih.pdf>.

191 US Congress, House, *Following the Money: Examining Current Terrorist Financing Trends and the Threat to the Homeland*, 114th Congress, (2016), Page 14. <https://www.govinfo.gov/content/pkg/CHRG-114hhrg22761/pdf/CHRG-114hhrg22761.pdf>.

192 For a discussion and explanation, see Charity & Security Network. “Proposed Bill Raises Guilt By Association Problems.” April 10, 2017. [https://charityandsecurity.org/news/hr2058\\_guilt\\_by\\_assn/](https://charityandsecurity.org/news/hr2058_guilt_by_assn/).



- In June 2017, seven members of Congress sent a letter to the Silicon Valley Community Foundation calling for it to halt its donations to Islamic Relief USA (IRUSA).<sup>193</sup> The letter accused Islamic Relief of “deep ties to the Muslim Brotherhood” (which is not a designated entity) and referenced an MEF article that unjustly characterized Islamic Relief as an “extremist” organization.<sup>194</sup>
  - In September 2017, Rep. Ron DeSantis (R-FL) offered an amendment to the Consolidated Appropriations Act of 2017 (H.R. 244) stating that: “None of the funds made available by this Act may be awarded to Islamic Relief Worldwide.”<sup>195</sup> Dozens of the country’s most prominent humanitarian aid groups opposed DeSantis’ amendment.<sup>196</sup> Ultimately, DeSantis failed to offer the amendment for a vote, having returned to Florida to address the aftermath of Hurricane Irma.<sup>197</sup>
  - On July 11, 2018, during a hearing of the Subcommittee on National Security of the Committee on Oversight and Government Reform entitled “The Muslim Brotherhood’s Global Threat,” Rep. Paul Gosar (R-AZ) cited an MEF report that dubiously asserted the existence of “extensive ties between Islamic Relief and the Egyptian Muslim Brotherhood.”<sup>198</sup>
  - In October 2018, MEF reported that seven members of Congress cited an MEF report in a letter to the FBI, IRS, and the Office of Personnel Management (OPM) asking for an investigation of Islamic Relief.<sup>199</sup>
- Attempts to obtain a copy of this letter through a Freedom of Information Act request to OPM, and repeated requests to the offices of the members of Congress involved, produced no result.
- In February 2019, Rep. Jim Banks (R-IN) introduced H.R. 160, “Expressing concern about the threat posed to democracy and human rights by theocratic groups operating in South Asia.”<sup>200</sup> Banks’ resolution repeated the false assertion that HHRD had “openly partnered in 2017 with Pakistan’s *Falah-i-Insaniat* Foundation.”<sup>201</sup> At the time, only Sam Westrop of the Middle East Forum had reported this (see *Anatomy of a Congressional Information Manipulation Attack in Section 6.2*).<sup>202</sup> The bill was referred to the House Committee on Foreign Affairs where it died.
  - In March 2019, Sarah Stern of the Endowment for Middle East Truth (EMET), who we identify as a *legitimator*, marshaled support for a letter addressed to Rep. Nancy Pelosi (D-CA) and Rep. Eliot Engel (D-NY). The letter called for the removal of Rep. Ilhan Omar (D-MN) from the House Foreign Affairs Committee and named Omar’s ties to Islamic Relief USA as one of the concerns.<sup>203</sup> The letter was based in part on MEF content production falsely tying Islamic Relief to terrorist groups.<sup>204</sup> Americans for Peace and Tolerance and the Center for Security Policy, which we identify as *generators*, cosigned the letter along with several other civil society organizations.

193 The signatories of the letter were Representatives Paul Gosar (R-AZ), Steve King (R-IA), Doug Lamborn (R-CO), Trent Franks (R-AZ), Ted Budd (R-NC), Chuck Fleischmann (R-TN), and Ted Poe (R-TX). See <https://scharinteragmu.wpenline.com/wp-content/uploads/2023/12/Gosar-et-al-SVCF-letter.pdf>.

194 Roman, Gregg. “Shooting The Messenger: Silicon Valley Foundation Lashes Out at Middle East Forum.” *The Daily Caller*, March 22, 2017. <https://dailycaller.com/2017/03/22/shooting-the-messenger-silicon-valley-foundation-lashes-out-at-middle-east-forum/>.

195 US Congress, House, *Amendment to Division G of Rules Committee Print 115–31 offered by Mr. DeSantis of Florida. H.R. 3354 - Department of the Interior, Environment, and Related Agencies Appropriations Act, 2018 [Make America Secure and Prosperous Appropriations Act, 2018]*. <https://rules.house.gov/bill/115/hr-3354>.

196 Schulberg, Jessica. “House Republican Drops Bid (For Now) To Defund Islamic Charity.” *HuffPost*, September 8, 2017, sec. Politics. [https://www.huffpost.com/entry/house-republican-drops-bid-for-now-to-defund-islamic-charity\\_n\\_59b2c718e4b0354e4411bec1](https://www.huffpost.com/entry/house-republican-drops-bid-for-now-to-defund-islamic-charity_n_59b2c718e4b0354e4411bec1).

197 Schulberg, “House Republican Drops Bid (For Now).”

198 US Congress, House, *The Muslim Brotherhood’s Global Threat, Before the Subcommittee on National Security of the Committee on Oversight and Government Reform*, 115th Congress, (2018). <https://www.govinfo.gov/content/pkg/CHRG-115hhrg31367/html/CHRG-115hhrg31367.htm>.

199 The Middle East Forum reported the signatories of the letter as being “representatives Ted Budd, Chuck Fleischmann, Matt Gaetz, Paul Gosar, Debbie Lesko, Barry Loudermilk, and Walter Jones.” Middle East Forum. “MEF Reveals Islamic Relief under Investigation; Congress Demands Answers,” October 18, 2018. <https://web.archive.org/web/20230606231905/https://www.meforum.org/7281/mef-reveals-islamic-relief-under-investigation>.

200 US Congress, House, *Expressing concern about the threat posed to democracy and human rights by theocratic groups operating in South Asia*. H.R. 160, 116th Congress, Introduced in House February 28, 2019. <https://www.congress.gov/bills/116/congress-house-resolution/160/text>

201 The *Falah-e-Insaniat* Foundation (FIF) was a charitable arm of the radical Kashmiri-based Islamist group *Lashkar-e-Taiba*. Both organizations are designated as terrorist groups in the US. FIF was banned in Pakistan in 2019.

202 Westrop, Sam. “American Islamist Charity Openly Partners with Designated Terrorists.” *Rabwah Times*, January 4, 2018. <https://www.rabwah.net/american-islamist-charity-openly-partners-designated-terrorists%E2%80%A8/>; Westrop, Sam. “Pakistani Terror Groups Use Charitable Proxies to Get US Funds.” *National Review*, January 24, 2018. <https://www.nationalreview.com/2018/01/pakistani-terror-groups-charitable-guises-us-funds/>; *Hindu Post*. “Bangladeshi Islamists Go to Washington.” September 25, 2018, sec. World. <https://hindupost.in/world/bangladeshi-islamists-go-to-washington/>.

203 Stern, Sarah, Brigitte Gabrielle, Andrew S. Borans, Helen Freedman, Judy Freedman Kadish, Charles Jacobs, Fred Fleitz, et al. “Letter to Speaker Nancy Pelosi and Chairman Eliot Engel.” March 4, 2019. <https://scharinteragmu.wpenline.com/wp-content/uploads/2023/12/EMET-letter-to-Pelosi-Engel-re-Ilhan-Omar.pdf>.

204 For the content in question, see Westrop, Sam. “Islamic Relief: Charity, Extremism & Terror.” Middle East Forum, June 20, 2018. <https://web.archive.org/web/20230926223942/https://www.meforum.org/7403/islamic-relief-charity-extremism-terror>.

- In November 2019, three members of Congress called for an investigation into HHRD in a letter to Ambassador Nathan Sales, coordinator for Counterterrorism at the State Department.<sup>205</sup> The letter cited manipulated information produced by the Middle East Forum and reported by Sam Westrop in the *National Review* to falsely tie HHRD to the *Falah-i-Insaniat* Foundation and *Lashkar-e-Taiba* in expressing concern about Ambassador Khan's appointment.

## 4.2 Manipulated information in the 117<sup>th</sup> and 118<sup>th</sup> Congresses

- In January 2022, Rep. Scott Perry (R-PA) wrote a letter to President Biden opposing the appointment of Masood Khan as Pakistan's Ambassador to the United States.<sup>206</sup> Rep. Perry cited manipulated information produced by the Middle East Forum, and reported by Sam Westrop in the *National Review*, to falsely tie HHRD to the terrorist group *Lashkar-e-Taiba* in expressing concern about Ambassador Khan's appointment.<sup>207</sup>
- In March 2022, following Khan's approval as Ambassador, Representatives Gregory Steube (R-FL), Mary Miller (R-IL), and Scott Perry (R-PA) raised concerns about Khan's cooperation with HHRD, citing the Middle East Forum's manipulated information that falsely tied HHRD to *Lashkar-e-Taiba*.<sup>208</sup>
- On May 5, 2022, House Foreign Affairs Committee staff sent an email to the USAID Bureau for Legislative and Public Affairs team demanding to know why USAID had awarded a \$110,000 grant to HHRD "despite longstanding, detailed allegations that HHRD is connected to designated terrorist organizations, terror financiers, and extremist groups."<sup>209</sup> The letter sourced this allegation to the November 2019 congressional letter to Ambassador Nathan Sales, which in turn referenced manipulated information produced by the Middle East Forum and reported by Sam Westrop in the *National Review*.<sup>210</sup>
- In November 2022, Rep. Michael McCaul (R-TX) tweeted from the House Foreign Affairs Committee Majority account: "I have asked @USAID to explain a grant made to an org Congress has repeatedly raised concerns about because of its reported association with terrorists."<sup>211</sup> Subsequent correspondence confirms that the organization referred to in Rep. McCaul's tweet is HHRD.<sup>212</sup> In Section 6.2, we trace the source of McCaul's allegations about HHRD to MEF's manipulation of information derived from the Pakistani news outlet *Frontier Post*.
- On January 11, 2023, USAID staff briefed the staff of the House Foreign Affairs Committee (HFAC) on the topic of USAID's grant to HHRD. USAID informed HFAC staff that it had forwarded information provided by the Committee to USAID's Office of Inspector General.<sup>213</sup>
- On January 24, 2023, Rep. Michael McCaul (R-TX) wrote to Samantha Power, USAID Administrator, referencing "longstanding, detailed allegations that HHRD is connected to designated terrorist organizations, terror financiers, and extremist groups."<sup>214</sup> In Section 6.2, we trace the source of McCaul's false allegations about HHRD in this letter to MEF's manipulation of information derived from the Pakistani English language *Frontier Post*.

205 The three signatories of the letter were Representatives Chuck Fleischmann (R-TN), Jim Banks (R-IN), and Randy Weber (R-TX). See Banks, Jim, Chuck Fleischmann, and Randy Weber. "Letter to Ambassador Nathan Sales, Coordinator for Counterterrorism, U.S. Department of State," November 1, 2019. <https://scharinteragmu.wpengine.com/wp-content/uploads/2023/12/Banks-et-al-letter-to-Amb-Sales.pdf>.

206 Perry, Scott. "Letter from Rep. Perry to Joseph R. Biden Jr.," January 27, 2022. <https://scharinteragmu.wpengine.com/wp-content/uploads/2023/12/Perry-letter-to-POTUS-re-Masood-Khan.pdf>.

207 Westrop, Sam. "A Terror Supporter Goes to Washington." *National Review* (blog), November 15, 2021. <https://www.nationalreview.com/2021/11/a-terror-supporter-goes-to-washington/>.

208 Perry, Scott, W. Gregory Steube, and Mary E. Miller. "Letter to Merrick Garland, Attorney General of the United States," March 9, 2022. <https://scharinteragmu.wpengine.com/wp-content/uploads/2023/12/Perry-letter-to-AG-Garland-re-Masood-Khan.pdf>.

209 The email is referenced in a January 2023 letter from Rep. Michael T. McCaul (R-TX), Chairman, House Foreign Affairs Committee, to Samantha Power, Administrator, USAID: McCaul, Michael T. "Letter to Samantha Power, Administrator, USAID," January 24, 2023. <https://scharinteragmu.wpengine.com/wp-content/uploads/2023/12/McCaul-USAID-HHRD-Grant-Letter54.pdf>.

210 See Banks, Jim, Chuck Fleischmann, and Randy Weber. "Letter to Ambassador Nathan Sales, Coordinator for Counterterrorism, U.S. Department of State," November 1, 2019. <https://scharinteragmu.wpengine.com/wp-content/uploads/2023/12/Banks-et-al-letter-to-Amb-Sales.pdf>.

211 House Foreign Affairs Committee Majority. Twitter Post. November 17, 2022, 3:15PM.

<https://twitter.com/houseforeigngop/status/159333707705234049?s=20&t=W6ighsx1fhvleQ6Zo0yfg>

212 McCaul, Michael T. "Letter to Samantha Power"

213 McCaul, Michael T. "Letter to Samantha Power"

214 McCaul, Michael T. "Letter to Samantha Power"

In August 2023, USAID’s Vetting Support Unit notified HHRD that it had completed its vetting process and had “determined that Helping Hand for Relief and Development Inc. is eligible at this time to receive a USAID award in connection with the [Ocean Freight Reimbursement project].”<sup>215</sup>

Over the course of the four congressional sessions in question, members of Congress took a series of actions premised on manipulated information about Muslim-led humanitarian INGOs produced by *generators*, such as the Middle East Forum, and supported by *legitimizers*, such as M. Zuhdi Jasser. This percolation of manipulated information on Capitol Hill unjustly harmed the reputation of Muslim-led humanitarian INGOs and wasted the time of members of Congress, their legislative staff, and executive branch personnel.

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215 “Letter from USAID Vetting Support Unit to HHRD,” August 16, 2023. <https://scharinteragmu.wpengine.com/wp-content/uploads/2023/12/USAID-Eligibility-Notice-HHRD.pdf>.

# 5.0 The funding network



The *generators* of manipulated information that we identify in this report operate as 501(c)3 nonprofit organizations, which makes them eligible to receive tax-free donations. Their activities, while harmful, are not technically illegal due to protections afforded by the First Amendment.<sup>216</sup> Over the past five years, investigative journalists, civil society advocates, and philanthropic actors have worked to raise awareness and implement strategies to reduce the flow of charitable donations to organizations that contribute to polarization and social harm.<sup>217</sup> In this section, we will address the various challenges posed by the flow of charitable funding to harmful, but legally protected, organizations. Finally, we will provide recommendations to funders on how to assess and manage the risks that these activities may pose.

## 5.1 Understanding and managing risk

Information manipulation campaigns manifest in various forms. They operate within complex political and media environments and are designed to inflict direct harm on institutions and individuals. The *generators* of manipulated information that target Muslim-led humanitarian INGOs, as well as those who *legitimate* and *disseminate* it, also indirectly harm vulnerable beneficiaries, whether victims of natural disasters or human-made conflicts. Partners, funders, and other stakeholders need to understand their exposure to risk when navigating this complex environment.

Except in rare cases of defamation, the content of information manipulation campaigns is legally protected. Harmful forms of speech are protected by the First Amendment, unless the speech act directly incites imminent criminal activity or consists of specific threats of violence targeted against a person or group.<sup>218</sup> Relative to other Western democracies, the United States maintains an extraordinarily high legal standard for restricting or prohibiting speech, religious freedom, and political association. This differs from the

United Kingdom, where Sam Westrop was found guilty of defamation and ordered to pay significant damages for disseminating manipulated information that targeted Islam Channel CEO, Mohamed Harrath.<sup>219</sup> It also differs from Canada, where Benjamin Dichter, Tahir Aslam Gora, Raheel Raza, Syed Sohail Raza, and Joseph Hazelton were found guilty of defaming Islamic Relief Canada in June 2023.<sup>220</sup>

In the United States, information manipulation has significant real-world consequences for individuals and organizations while providing limited avenues for seeking recourse. The scope of IRS regulation and oversight of the nonprofit sector is limited to specific activities such as monitoring political activities and ensuring compliance with financial regulations. The IRS adopts a “hands-off” approach to the actual work carried out by charitable organizations and defers to the courts to make determinations on what constitutes legal or illegal activities.

Ironically, First Amendment protections, which are designed to strengthen and safeguard democracy and a free society, expose civil society stakeholders to significant risks. As we’ve noted in Section 3, information manipulation campaigns deploy a variety of techniques such as “conflation” and “theologocentrism” to reduce actors and complex political conflicts to simplistic and oppositional binaries (e.g., Hindu versus Muslim, East versus West, etc.). These techniques are designed to further specific political agendas by amplifying divisions, magnifying risks, and sowing discord between the target(s) of a campaign and their peer organizations. As a result, funders, partners, and other stakeholders can find themselves navigating conflicting paths of reputational risk during information manipulation campaigns.

Serious reputational risks are faced by funders of humanitarian INGOs that are targeted by information manipulation campaigns. Funders may be tempted to minimize their exposure to these risks by succumbing

216 “False Speech and the First Amendment: Constitutional Limits on Regulating Misinformation.” Washington, DC: Congressional Research Service, August 1, 2022. <https://crsreports.congress.gov/product/pdf/IF/IF12180>.

217 See, for example Kotch, Alex. “How Fidelity, Schwab, and Vanguard Fund Hate Groups.” *The New Republic*, August 9, 2023. <https://newrepublic.com/article/172927/fidelity-schwab-vanguard-charitable-donor-advised-funds-hate-groups>.

218 The Supreme Court’s most comprehensive description of “true threats” jurisprudence is found in *Virginia v. Black*, 538 U.S. 343 (2003); see also *Brandenburg v. Ohio*, 395 U.S. 444 (1969).

219 Warby, Mr. Justice. *Mohamed Ali Harrath v (1) Stand for Peace Ltd (2) Samuel Westrop* (High Court Queen’s Bench Division March 30, 2017). [https://www.carter-ruck.com/images/uploads/documents/Harrath-v-\(1\)Stand\\_for\\_Peace-\(2\)Westrop-Judgment.pdf](https://www.carter-ruck.com/images/uploads/documents/Harrath-v-(1)Stand_for_Peace-(2)Westrop-Judgment.pdf)

220 Nasser, Shanifa. “Canadian Muslim Charity Wins ‘milestone’ Settlement after Being Falsely Accused of Funding Terrorism.” *CBC News*, June 9, 2023. <https://www.cbc.ca/news/canada/toronto/islamic-relief-muslim-charity-canada-terror-1.6870177>.

to the pressures of adverse publicity based on the circulation of manipulated information in the public sphere. However, funders also need to consider the medium and long-term consequences of withdrawing funding from the targets of informational manipulation campaigns. Most importantly, funders need to weigh the reputational risks involved with abandoning their partners and beneficiaries in times of critical need, which can disrupt lifesaving operations. To mitigate and manage these risks effectively, funders and other stakeholders need to understand the broader funding landscape within which the legally protected, but harmful, organizations that are involved in information manipulation campaigns operate.

## 5.2 How philanthropy funds information manipulation campaigns

A Donor Advised Fund (DAF), sometimes called a “charitable checking account” is a type of philanthropic financial vehicle that provides donors with a variety of benefits in their overall wealth management strategy. Housed within a larger charitable fiduciary such as a foundation or trust, a DAF is established by a donor just like a savings, checking, or investing account. Upon doing so, the donor receives a tax receipt for their contribution from the fiduciary. Unlike the case in retail or investment financial services however, monies stored in DAFs are legally owned and operationally controlled by the fiduciary, not the donor. In this arrangement, the donor technically and legally becomes an “advisor” who provides “recommendations” to the charitable fiduciary on how their donated funds should be distributed or dispersed. Nonetheless, as is widely known within the philanthropic industry, in practice donors operate with wide discretion, directing the investment and management of the DAF while the foundation that holds the funds provides a thin layer of oversight, administrative support, and due diligence. In addition to not being compelled to follow a distribution schedule as would be the case through a family foundation, donors also benefit from the anonymity a larger charitable foundation provides. That is, when a donation is made, it is distributed in the name of the foundation, not the donor, making the ability to

give anonymously to grantees an attractive feature of DAFs for philanthropists eager to shield their giving practices or political activities from the public. It is in this context that many of the donations made to the purveyors of information manipulation cited above take place. For example, while on paper it may seem that Fidelity Charitable or Donor’s Trust are donating to the Middle East Forum, it is much more likely the case that several individuals with DAFs held at those institutions are making “recommendations” and directing funds to MEF and other *generators*.

Various other philanthropic mechanisms can be employed to channel financial support to nonprofit organizations. Donors may also use legacy funds, effectively when a donor outlines a distribution arrangement in their will but cedes operational control to a fiduciary. Moreover, family foundations directly contribute to nonprofit entities, often with limited governance or oversight. Although less prevalent, employee gift-giving and matching programs, typically administered by larger charitable fiduciaries but situated within large corporations, can also serve as means to channel funds toward nonprofit organizations.

The five core *generators* received more than \$30 million in funding from 269 organizations in the 5-year time frame from 2016 to 2021.<sup>221</sup> Table 4 presents the funders that provided \$150,000 or more to the five *generators* during this time frame.<sup>222</sup> While the aggregate numbers of charitable donations to the information manipulation groups reviewed here are substantial, it is important to place these charitable contributions and their significance into context. That is, while a summary review of the data may suggest to readers that there is a direct causal relationship and link between charitable funding and information manipulation and therefore, those directing funding are responsible, directly, or indirectly, also for information manipulation, a range of contextual factors should be taken into consideration before arriving at such conclusions. Despite the transparency of correlating data, linking funding to grantee behavior, the motivations, awareness, and processes surrounding charitable giving are multifaceted and often opaque.

221 The 2016-21 time frame corresponds with the period of the most intense attacks on Muslim-led humanitarian INGOs. Moreover, IRS 990 forms tend to become available two years after the tax year in which they are filed, so 2021 filings would be the most recent available at the time of writing.

222 We set a threshold of \$150,000 or greater as we had incomplete data for one funder who fell just below this threshold.

**TABLE 4**  
**Funding sources contributing \$150,000 or greater, over the period from 2016 to 2021 to the five generators of manipulated information attacks on Muslim-led humanitarian relief and development aid INGOs.**

Funders providing \$150,000 or greater to the five generators (2016 to 2021)	Total disbursed to five generators (2016–2021)	Percentage of total funds disbursed (2016–2021)	Middle East Forum	Investigative Project on Terrorism	Center for Security Policy	Gatestone Institute	American for Peace & Tolerance
Donor's Trust	\$ 13,774,711	1.62%	\$ 9,867,500	\$ 120,000	\$ 3,367,211	\$ 420,000	\$ –
Fidelity Investments Charitable Gift Fund	\$ 5,683,775	0.01%	\$ 1,422,914	\$ 2,866,990	\$ 223,811	\$ 394,355	\$ 775,705
The Kenneth Leventhal Foundation	\$ 1,855,000	12.12%	\$ 1,050,000	\$ 805,000	\$ –	\$ –	\$ –
Diana Davis Spencer Foundation	\$ 1,740,000	0.50%	\$ –	\$ 1,125,000	\$ 410,000	\$ 205,000	\$ –
Sarah Scaife Foundation	\$ 1,425,000	0.64%	\$ –	\$ –	\$ 1,425,000	\$ –	\$ –
The Abstraction Fund	\$ 1,216,496	40.76%	\$ 586,496	\$ 110,000	\$ 20,000	\$ 500,000	\$ –
MZ Foundation	\$ 795,000	3.16%	\$ 210,000	\$ 300,000	\$ 110,000	\$ 125,000	\$ 50,000
Vanguard Charitable	\$ 789,200	0.01%	\$ 675,100	\$ 5,000	\$ 30,000	\$ 79,100	\$ –
Schwab Charitable Fund	\$ 672,053	0.00%	\$ 394,043	\$ 51,360	\$ 90,700	\$ 130,210	\$ 5,740
Jewish Communal Fund	\$ 502,947	0.02%	\$ 160,818	\$ 269,999	\$ –	\$ 30,850	\$ 41,280
Jewish Community Federation of San Francisco, Marin Peninsula, and Sonoma Counties	\$ 406,510	0.08%	\$ 203,610	\$ 52,500	\$ –	\$ 150,400	\$ –
Mercer Family Foundation	\$ 300,000	0.37%	\$ –	\$ –	\$ –	\$ 300,000	\$ –
Making America Great	\$ 250,000	6.85%	\$ –	\$ –	\$ 250,000	\$ –	\$ –
The Jack Roth Charitable Foundation	\$ 232,500	2.38%	\$ –	\$ –	\$ –	\$ 232,500	\$ –
Combined Jewish Philanthropies of Greater Boston	\$ 230,550	0.02%	\$ 17,250	\$ 100,100	\$ –	\$ –	\$ 113,200
The Blum Family Foundation	\$ 222,272	3.38%	\$ 131,573	\$ 90,699	\$ –	\$ –	\$ –
Ben & Esther Rosenbloom Foundation	\$ 212,700	2.06%	\$ 140,200	\$ 72,500	\$ –	\$ –	\$ –
Jewish Community Foundation of the Jewish Federation Council of Greater Los Angeles	\$ 207,580	0.04%	\$ 196,530	\$ 11,050	\$ –	\$ –	\$ –
Abraham Kamber Foundation	\$ 203,200	14.00%	\$ 198,200	\$ 5,000	\$ –	\$ –	\$ –
Friese Foundation	\$ 200,000	1.53%	\$ –	\$ 200,000	\$ –	\$ –	\$ –
Youth Towns of Israel California	\$ 175,000	14.13%	\$ –	\$ –	\$ –	\$ 175,000	\$ –
David and Janet Polak Foundation	\$ 165,000	1.04%	\$ 165,000	\$ –	\$ –	\$ –	\$ –
The Edelstein Foundation	\$ 150,000	24.08%	\$ –	\$ 150,000	\$ –	\$ –	\$ –

Sources: IRS 990s, Foundation Directory Online.

There are various institutions that direct monies to the information manipulators that may broadly be categorized into three groups: 1) family and private foundations, 2) national DAF providers, and 3) communal funds. Each of these funding agencies has a range of funding priorities, interest areas, and internal dynamics that determine where, how, and why they give the way that they do. As the stakeholder community explores avenues to mitigate the risk of information manipulation, the data above should be reviewed with nuance and care to identify various interventions.

For family foundations, it is clear from the data that each of the groups reviewed here has a range of

interests. For example, although the Sarah Scaife Foundation has provided substantial sums to the Center for Security Policy (\$1.4 million), their overall giving to the information manipulation groups here has been a tiny fraction of its overall giving during the period in question (0.65%). In other areas, the foundation has given to conservative policy organizations like the Hoover Institution and the Heritage Foundation but has also supported the Foundation for Excellence in Higher Education which funds dozens of research programs with varying areas of inquiry in the US and UK. The diverse range of the Foundation's giving practices reflects its governance structure and perhaps the various interests of family members and stakeholders.

The same cannot be said of the Abstraction Fund, however, another family foundation that appears on the top of the list of funders of the anti-Muslim information manipulation activity. In this instance, the fund has provided slightly less than the Sarah Scaife Foundation (\$1.2 million), however this amount constitutes approximately 40% of its overall giving. Moreover, its other grant disbursements have been narrowly focused on similar anti-Muslim efforts. For example, between 2016 and 2021, IRS 990-PF forms show that the Abstraction Fund funded organizations such as *Legitimator* M. Zuhdi Jasser's American Islamic Forum for Democracy (\$95,000) and the David Horowitz Freedom Center (\$61,250).<sup>223</sup>

By comparison, other family and private foundations' percentage of overall giving that is directed to the information manipulators identified in the top 25 funders list, range from 0.5% (Diana Davis Spencer Foundation) to 24% (The Edelman Foundation). So, even within the category of family foundations responsible for funding anti-Muslim information manipulation, we can see a range in funding patterns, percentages, and priority areas, making it difficult to ascertain the degree of intentionality (and responsibility) these foundations have for the harm caused by their grantees.

For national DAF providers such as Donor's Trust, Vanguard Charitable Fund, and others, there is even greater opacity in terms of understanding these institutions' awareness of the problematic activities engaged in by the information manipulators they fund. To be clear, the funds directed from these institutions are very substantial. Consider, for example, that Donor's Trust contributed \$13.7 million during the period under review while Fidelity Charitable provided \$5.7 million during the same time. In terms of percentage of overall giving, these amounts however are minor or miniscule, with the Donor's Trust contributing 1.6% of its giving and Fidelity Charitable providing a mere one hundredth of one percent (0.013%). The percentages of total giving provided to the *generators* by other DAFs were even smaller: Vanguard (0.009%) and Schwab Charitable (0.004%).

It should be remembered that functioning primarily as fiduciary agents, national DAF providers maintain "cause neutral" policies to govern their DAF directed grants. That is, if a grantee is legally eligible and in good financial standing with relevant regulatory bodies, national DAF providers do not intervene in the way a donor chooses to direct their funds. This is an important policy point to consider as stakeholders explore ways to mitigate the impact of information manipulation, even if the aggregate funding from these institutions has exceeded \$30 million during the period in review. National DAF providers thus far have been largely unresponsive to advocacy efforts to change these policies.

While private/family foundations and national DAF providers represent opposite sides of the spectrum of type of charitable institutions, what may be referred to as "communal funds" occupy a middle ground or hybrid model. In the data set above, there are five of these types of institutions mentioned: Combined Jewish Philanthropies of Greater Boston Inc., The Jewish Federation of Sarasota-Manatee, Jewish Community Foundation of the Jewish Federation Council of Greater Los Angeles, Jewish Communal Fund, and Jewish Community Federation of San Francisco, Marin Peninsula, and Sonoma Counties. These funds operate similarly to community foundations in that they are classified as public charities by the IRS, offer DAFs and other types of funds, and have the capacity to make direct grants from their own discretionary, often endowed funds. In this scenario, communal funds constitute a philanthropic ecosystem of stakeholders with a wide range of interests, funding priorities, and giving capacities. The Jewish Communal Fund (JCF) in New York City, for example, according to its website, manages \$2.7 billion in assets representing over 4,700 different funds. In 2022, JCF's fundholder-directed contributions reached \$600 million, while nearly \$3 million was directed by the foundation itself.<sup>224</sup> During the period in review, \$502,947 out of a total of nearly \$3 billion, or 0.017%, was given to the information manipulation *generators*. Similarly small percentages were given to the information manipulation *generators* by JCF's peers:

223 The David Horowitz Freedom Center's (DHFC) projects include Jihad Watch and *FrontPage Magazine*, the latter of which we identify as a *disseminator*. The Anti-Defamation League has described DHFC as an organization that "promotes anti-Muslim views and features events with anti-Muslim activists." See Anti-Defamation League. "Backgrounder: Stop Islamization of America Allies," September 19, 2012. [https://web.archive.org/web/20121017010310/http://www.adl.org/main\\_Extremism/pamela-geller-stop-islamization-of-america.htm?Multi\\_page\\_sections=sHeading\\_6](https://web.archive.org/web/20121017010310/http://www.adl.org/main_Extremism/pamela-geller-stop-islamization-of-america.htm?Multi_page_sections=sHeading_6); The Southern Poverty Law Center has named DHFC as an "anti-Muslim hate group." See Southern Poverty Law Center. "David Horowitz." Accessed September 26, 2023. <https://www.splcenter.org/fighting-hate/extremist-files/individual/david-horowitz>.

224 Jewish Communal Fund. "Jewish Communal Fund – Donor Advised Funds." Accessed September 25, 2023. <https://jcfny.org/>.



- The Jewish Federation of Sarasota-Manatee (0.9%)
- Jewish Community Federation of San Francisco, Marin Peninsula, and Sonoma Counties (0.076%)
- Jewish Community Foundation (Los Angeles) (0.035%)
- Combined Jewish Philanthropies of Greater Boston (0.024%)

As stakeholders explore various risk-mitigating mechanisms to reduce the harm caused by anti-Muslim information manipulators, it is critical to remember that philanthropic institutions are largely disconnected and have little control over the activities of their grantees. In many cases, funders are simply unaware of the negative impact groups like MEF, IPT, and CSP have on public discourse and in this case, humanitarian aid. In some cases, of course, philanthropists are direct activists motivated by their own political and ideological interests and are actively engaged in supporting and shaping their grantee's practices. Stakeholders must carefully distinguish between the various types of funders to guarantee effective interventions.

### 5.3 Background on funding harmful activities

In 2017, Guidestar (now Candid), the primary source of information and database for U.S. nonprofit organizations, took the step of highlighting several nonprofit entities that had been identified as hate groups by the Southern Poverty Law Center (SPLC).<sup>225</sup> As a due diligence service, this action was intended to offer insights on the activities of these organizations to researchers, donors, and other interested parties. However, Guidestar's initiative encountered swift opposition from many of the organizations designated by SPLC, as well as from those who believed that Guidestar had compromised its impartiality and neutrality.<sup>226</sup> These critics contended that SPLC's

designations were driven by political and ideological motivations.<sup>227</sup> Alongside alleged threats and incidents of harassment directed at Guidestar staff, concerted efforts by various conservative groups, including the Family Research Council, the Heritage Foundation, and the Alliance Defending Freedom, as well as a coalition of over forty conservative organizations, prompted Guidestar to rescind the labels and discontinue this practice just one month after its launch.<sup>228</sup>

In the meantime, philanthropic organizations and civil society advocates have taken various steps to raise awareness of these aspects of philanthropy in the US. In 2019, the independent news outlet *Sludge*, known for its investigations into the impact of lobbying and money in politics, published a series of articles that exposed how white supremacist and other harmful organizations receive financial support from philanthropic institutions through Donor Advised Funds (DAFs).<sup>229</sup> *Sludge's* reports tracked the tax returns of the donors to 34 organizations designated as hate groups by SPLC between 2014 and 2017, revealing charitable donations totaling over \$11 million originating from entities such as Donors Trust, Fidelity Charitable, Schwab Charitable, and Vanguard Charitable.<sup>230</sup>

The same year, Amalgamated Foundation launched the "Hate is Not Charitable" campaign, which urged the philanthropic community to refrain from directing funds to malevolent and harmful activities.<sup>231</sup> The pledge campaign gained nearly 100 signatories upon its launch and has served as a primary platform for philanthropic actors to coordinate efforts aimed at reducing the risk of funding such organizations.

The grassroots advocacy campaign "Unmasking Fidelity" has taken a more confrontational approach to the challenges posed by Donor Advised Funds (DAFs).<sup>232</sup> Its strategy involves exerting pressure

225 CBS News. "GuideStar, Website about Charities, Flags Dozens of Nonprofits as Hate Groups." June 8, 2017. <https://www.cbsnews.com/news/guidestar-charity-website-flags-nonprofits-hate-groups/>.

226 Hogan, Susan. "After Conservative Backlash, Charity Tracker GuideStar Removes 'Hate Group' Labels." *Washington Post*, October 25, 2021. <https://www.washingtonpost.com/news/morning-mix/wp/2017/06/26/after-conservative-backlash-charity-tracker-guidestar-removes-hate-group-labels/>; Candid. "Update Regarding SPLC Flags on GuideStar Nonprofit Profiles." Accessed September 25, 2023. <https://candid.org/about/press-room/releases/update-regarding-splc-flags-on-guidestar-nonprofit-profiles>.

227 Bier, Jeryl. "The Insidious Influence of the SPLC." *Wall Street Journal*, June 21, 2017, sec. Opinion. <https://www.wsj.com/articles/the-insidious-influence-of-the-splc-1498085416>.

228 Hogan, Susan. "After Conservative Backlash, Charity Tracker GuideStar Removes 'Hate Group' Labels." *Washington Post*, October 25, 2021. <https://www.washingtonpost.com/news/morning-mix/wp/2017/06/26/after-conservative-backlash-charity-tracker-guidestar-removes-hate-group-labels/>.

229 Kotch, Alex. "America's Biggest Charities are Funneling Millions to Hate Groups from Anonymous Donors." *Sludge*, February 19, 2019. <https://readsludge.com/2019/02/19/americas-biggest-charities-are-funneling-millions-to-hate-groups-from-anonymous-donors/>.

230 Kotch, "America's Biggest Charities."

231 Amalgamated Foundation. "Hate Is Not Charitable: Taking Action." Accessed September 25, 2023. <https://amalgamatedfoundation.org/insights-and-initiatives/hate-not-charitable-taking-action>.

232 Unmasking Fidelity. "Unmasking Fidelity." Accessed September 25, 2023. <https://unmaskingfidelity.org/>.

on Fidelity Charitable to disclose its grants to organizations that the campaign considers to be engaging in hateful or other problematic activities. Additionally, “Unmasking Fidelity” advocates for Fidelity Charitable to allocate funds to address the alleged harm caused by these organizations. Fidelity Charitable has not reacted publicly to this pressure and continues to adopt a “cause-neutral” stance.<sup>233</sup>

Ongoing investigative and academic research has ensured that the problem of hate funding through DAFs remains a topic of discussion. Recently, Open Democracy, an independent UK-based online research news outlet, uncovered that Donor Advised Funds in the United States had channeled over \$272 million to groups promoting anti-LGBTQ activities both domestically and abroad.<sup>234</sup> The Council on Foundations, an umbrella organization representing institutional philanthropy in the United States, has also developed a policy training program called “Values Aligned Philanthropy” to assist its members in addressing the complexities of this ever-evolving landscape.<sup>235</sup> Other dedicated philanthropic consulting services have also emerged to provide due diligence services for foundations and other fiduciaries attempting to mitigate their risk exposure to extremist and misinformation funding.

In addition to the opposition to Guidestar’s initiative, there are ongoing criticisms of programs aimed at restricting or preventing funding to nonprofit organizations involved in information manipulation campaigns or engaging in other harmful activities. These critics vigorously defend the principles of donor intent and donor anonymity as matters of free speech, religious liberty, and political association. Donor intent, or the expression of a donor’s values and mission for their philanthropy, has historically been a guiding practice for philanthropic institutions and still underwrites the policies and ethos of groups like Fidelity Charitable and Schwab Charitable. However,

for advocates aiming to shine light on the funding practices of anti-democratic forces, DAFs constitute a major source of dark money in need of significant reform and regulation.<sup>236</sup>

These conflicting perspectives have set the stage for large-scale litigation efforts. In 2010, the state of California introduced new policies that required nonprofits to reveal the identities of their major donors as part of annual reporting requirements. This move encountered significant resistance from multiple parties across the political spectrum and resulted in legal action against the state. In July 2021, the Supreme Court ruled in favor of the plaintiffs, the Thomas Moore Law Center and Americans for Prosperity Foundation.<sup>237</sup> The former was represented by the Alliance Defending Freedom (ADF). ADF has since continued its legal and political advocacy in this space through its “Freedom to Give” campaign, which points to Amalgamated Foundation and Unmasking Fidelity as examples of “cancel culture’s” perceived assault on fundamental American freedoms.<sup>238</sup> Most recently, ADF represented a client who submitted a consumer complaint to the Attorney General in Louisiana, alleging that Fidelity Charitable discriminated against a donor’s recommended grants to a series of conservative advocacy organizations known for their controversial practices.<sup>239</sup> While Fidelity Charitable eventually disbursed the grants, it was alleged that Fidelity had conducted more extensive due diligence on these groups compared to others with more liberal leanings.<sup>240</sup>

Among the most challenging factors facing stakeholders invested in preventing support (financial or otherwise) to misinformation activity, is the fact that only in rare cases is such activity obvious or blatant. Rather, as has been described above, purveyors of misinformation routinely mask their agendas through a complex web of coordinated activity designed to give the appearance of journalistic and

233 Fidelity Charitable. “Grant Review and Due Diligence Process.” Accessed September 25, 2023. <https://www.fidelitycharitable.org/legal/granting-due-diligence.html>.

234 Namubiru, Lydia. “Charity Loophole Lets US Donors Bankroll Hate – in Secret.” *OpenDemocracy*, July 5, 2023. <https://www.opendemocracy.net/en/5050/donor-advised-funds-daf-us-charity-law-loophole-bankroll-hate/>.

235 Council on Foundations. “Values-Aligned Philanthropy,” January 22, 2021. <https://cof.org/program-initiative/values-aligned-philanthropy>.

236 Flannery, Helen, and Chuck Collins. “Fixing What’s Broken with Donor-Advised Funds: Rewiring a Design Flaw That Encourages Warehousing of Charitable Assets.” *Institute for Policy Studies*, December 2021. <https://inequality.org/wp-content/uploads/2021/12/Fixing-Whats-Broken-with-Donor-Advised-Funds-Policy-Brief.pdf>.

237 *Americans for Prosperity Foundation v. Bonta*, No. 19-251, 19-255 (Supreme Court of the United States July 1, 2021).

238 Alliance Defending Freedom. “Alliance Defending Freedom.” Accessed September 25, 2023. <https://freedomtogive.org/>.

239 Freedom, Alliance Defending. “Consumer Complaint Alleges Religious Discrimination by Fidelity Charitable.” Alliance Defending Freedom. Alliance Defending Freedom, August 18, 2023. <https://adfflegal.org/press-release/consumer-complaint-alleges-religious-discrimination-fidelity-charitable>.

240 Tedesco, Jeremy. “No One Wins When Financial Institutions Play Politics with Your Money,” August 28, 2023. [https://www.realclearmarkets.com/articles/2023/08/28/no\\_one\\_wins\\_when\\_financial\\_institutions\\_play\\_politics\\_with\\_your\\_money\\_975410.html](https://www.realclearmarkets.com/articles/2023/08/28/no_one_wins_when_financial_institutions_play_politics_with_your_money_975410.html).

political credibility. In the case of anti-Muslim bias, misinformation propagandists often hide their bias and intentions under a thin veneer of otherwise credible discourse, most often in the form of national security, counterterrorism, and/or immigration reform. In other instances, concealed political agendas may unfold through complex networks of interrelated organizations and institutions that coordinate in a sophisticated way. For funding institutions, complex structures such as fiscal sponsorship, private-philanthropic partnerships, and synchronous information dissemination create a cloud of confusion that can only be made intelligible through continued education and risk mitigation.

Perhaps the most difficult challenge facing stakeholders, however, is the lack of legal regulation or cross-sector consensus on what constitutes harmful activity. That is, because the legal frameworks designed to promote and defend democratic values are being exploited for anti-democratic purposes, stakeholders, especially funders, must take it upon themselves to implement due diligence measures that can protect their institutions from inadvertently supporting extremism, misinformation, and hate activity. Ultimately, funding institutions will have to decide upon their own standards, policies, and procedures for allowing or preventing funding to nefarious groups.

### Recommendations for funders

Here, we outline recommendations for stakeholders, specifically funding agencies, interested in divesting from information manipulation and other social harmful pursuits.

**Risk Assessment and Management:** In the context of a socio-political and cultural environment marked by hyper-polarization, funders need to assess the risks associated with unintentionally supporting groups involved in harmful activities. Robust, transparent, and uniform due diligence processes and decision-making protocols can minimize reputational, operational, or legal risks, and shield funders from organizational shocks and their long-term repercussions.

**Aligning Core Values:** Most foundations, trusts, and charitable giving platforms operate with the aim of fostering vibrant communities, bolstering a strong civil society, and assisting vulnerable populations. Funders need to establish policies that can balance the philanthropic principle of donor intent with commitments to justice. Such policies may include, but are not limited to, areas such as anti-harm grantmaking.

**Engaged Philanthropy:** Given the growing use of nonprofit organizations for political and ideological purposes, including interventions in media and elections, funders should consider an “engaged philanthropy” approach instead of support for single-issue or narrowly focused advocacy groups. This approach should evaluate how organizations gauge their impact on beneficiaries and whether their programming is effectively addressing specific societal needs. Funders that are invested in promoting public education may enhance their due diligence standards to fund institutions that actively participate in—and promote—a healthier public discourse.

**Place-based Giving:** Finally, one of the most effective approaches for funders to reduce their exposure to questionable entities and activities is to embrace philanthropic strategies that focus on local needs. Typically, organizations and grantees are most familiar with the communities they operate in or serve. Collaborating with local partners to enhance due diligence or jointly fund and develop programs offers a straightforward method to ensure that a funder’s overarching mission, vision, and values are reflected in its grantmaking activities. Community foundations, as a subset of the broader institutional philanthropy landscape, represent a valuable resource that can be tapped into for such purposes.

# 6.0

# Case Studies



In this section, we focus on case studies of Islamic Relief and Helping Hand for Relief and Development, the two largest Muslim-led humanitarian relief and development aid INGOs in the US. They have also been the target of most attacks from the *generators*. The attacks on Islamic Relief and HHRD differ in substantial respects and combining the two cases sheds light on the broad spectrum of techniques and methods used by the *generators* and the resulting deleterious effects on Muslim-led humanitarian INGOs.

Non-state actors, such as anti-Muslim think tanks and advocacy groups, often build upon histories of information manipulation by state actors, as well as tailoring their own manipulated information. Attacks from state actors against humanitarian relief and development aid INGOs are used by non-state actors as “evidence” that these INGOs are associated with extremism and even terrorism. Moreover, the fact that humanitarian INGOs have been targeted by information manipulation attacks from non-state actors is used by state actors as “evidence” that the INGOs are bad actors. The reality is that Muslim-led humanitarian INGOs are under attack from both state and non-state information manipulators.

## 6.1 Islamic Relief Worldwide – Fielding Attacks from Both State and Non-State Actors

Islamic Relief Worldwide was founded in Birmingham, UK, in 1984 by two medical students of Egyptian origin. It has grown to become one of the largest Muslim-led humanitarian INGOs and operates in 47 countries across the globe.<sup>241</sup> In 2022, it had a total income of

GBP £234.18 million (USD \$288.89 million).<sup>242</sup> Islamic Relief gets most of its donations from private sources, which are overwhelmingly Muslim.<sup>243</sup> Islamic Relief is a member of the Disasters Emergency Committee (DEC), a consortium of 15 leading UK humanitarian relief INGOs.<sup>244</sup> It regularly partners with other high profile humanitarian relief and development aid INGOs.<sup>245</sup> It also receives funding from institutional donors, including USAID, FEMA, the UK’s Foreign, Commonwealth & Development Office (FCDO), and several UN agencies.<sup>246</sup> IRUSA and IRW’s records are publicly accessible, and its operations undergo regular audits by both institutional donors and the US, UK, and other governments.

Islamic Relief’s discourse echoes aid discourses on universalism and emphasizes the importance of common humanity, rather than religious solidarity, as a basis for assistance.<sup>247</sup> Danish political scientist Marie Juul Petersen, who has conducted extensive fieldwork at Islamic Relief project sites, characterizes it as “echoing mainstream development ideals and leaving only little room for religion.”<sup>248</sup> Petersen continues,

*Islamic Relief and Muslim Aid work to promote a development culture, and as such, resemble secular development NGOs rather than fellow Muslim ones. In this, they also resemble certain Christian NGOs, such as DanChurchAid and Christian Aid, whose work may be based on, or inspired by, Christian values, but whose vision is almost indistinguishable from those of secular organisations.*<sup>249</sup>

Islamic Relief maintains strong ties to the British political establishment. Members of Parliament from across party lines attend its annual Eid reception

241 Charity Commission for England and Wales. “Islamic Relief Worldwide - Charity 328158.” Accessed September 27, 2023. <https://register-of-charities.charitycommission.gov.uk/charity-search/-/charity-details/328158/what-who-how-where>.

242 Charity Commission for England and Wales. “Islamic Relief Worldwide - Charity 328158.”

243 Khan, Ajez Ahmed. “The Impulse to Give: The Motivations of Giving to Muslim Charities.” In *Sacred Aid: Faith and Humanitarianism*, edited by Michael N. Barnett and Janice Gross Stein. New York, NY: Oxford University Press, 2012.

244 “Who We Are.” Disasters Emergency Committee. Accessed September 27, 2023. <https://www.dec.org.uk/who-we-are>.

245 For a partnership with HIAS, see HIAS. “HIAS and Islamic Relief USA Partner to Bring Legal Protection to Refugees in Greece.” Accessed September 28, 2023. <https://hias.org/statements/hias-and-islamic-relief-usa-partner-bring-legal-protection-refugees-greece/>; for a partnership with Christian Aid and World Jewish Relief, see Kessler, Edward, and Miriam Arkush. “Keeping Faith in Development: The Significance of Interfaith Relations in the Work of Humanitarian Aid and International Development Organisations.” Cambridge, UK: The Woolf Institute of Abrahamic Faiths, 2009. Accessed September 28, 2023. <https://www.woolf.cam.ac.uk/assets/file-downloads/Keeping-Faith-in-Development.pdf>.

246 For a USAID funding example, see “Sudan – Complex Emergency,” Washington, DC: USAID, December 18, 2019. [https://www.usaid.gov/sites/default/files/2022-05/12.18.19\\_-\\_USAID-DCHA\\_Sudan\\_Complex\\_Emergency\\_Fact\\_Sheet\\_1.pdf](https://www.usaid.gov/sites/default/files/2022-05/12.18.19_-_USAID-DCHA_Sudan_Complex_Emergency_Fact_Sheet_1.pdf); For an FCDO example, see “DevTracker Programme GB-1-113992 Transactions,” August 17, 2012. <https://devtracker.fcdo.gov.uk/projects/GB-1-113992/components>; For a UN agency example, see UNDP. “UNDP Announces the Single Most Significant Agreement under ABADeI with Islamic Relief.” Accessed September 28, 2023. <https://www.undp.org/afghanistan/press-releases/undp-announces-single-most-significant-agreement-under-abadei-islamic-relief>.

247 Petersen, Marie Juul. *For Humanity or for the Umma? Aid and Islam in Transnational Muslim NGOs*. London, UK: Hurst & Company, 2015, 140.

248 Petersen, *For Humanity or for the Umma?* 140.

249 Petersen, *For Humanity or for the Umma?* 140.

at Westminster, illustrating its embeddedness in British society.<sup>250</sup> This is noteworthy because the UK government has been, in the words of Conservative peer Baroness Sayeeda Warsi, “obsessive” about checking the backgrounds of British Muslim leaders and civil society organizations with whom it associates.<sup>251</sup> In 2009, the then-Prince of Wales praised Islamic Relief for “providing humanitarian aid to literally millions of the world’s most vulnerable people over the past quarter of a century.”<sup>252</sup> In 2022, his office announced a “substantial” donation to Islamic Relief to support its work to help those affected by devastating floods in Pakistan.<sup>253</sup>

### 6.1.1 Attacks on Islamic Relief by state and non-state actors

In the aftermath of the Arab uprisings, Mohammad bin Zayed al Nahyan (MbZ), President of the United Arab Emirates, came to view any form of uncontrolled civil society activism as a fundamental challenge to the regime and a threat to the status quo of the region.<sup>254</sup> In 2012, the UAE closed the local offices of four INGOs, including the National Democratic Institute and Konrad Adenauer Stiftung, both of which pursue a democracy promotion agenda.<sup>255</sup> It was within this environment of rising fear that the UAE updated its counter-terrorism legislation in August 2014. To the consternation of international human rights observers, the vague and imprecise terminology of the new legislation permitted a range of peaceful expressions of dissent to be labeled “terrorism.”<sup>256</sup> Amnesty International characterized it as “[having] the potential to be used against peaceful activists and government

critics due to the broad ambit of its provisions, their vague definition, and the range of actions that may be considered under the law to amount to terrorism.”<sup>257</sup>

In November 2014, IRW’s leadership was blindsided when it appeared on a list of 85 organizations that the UAE considered “terrorist” groups.<sup>258</sup> An IRW spokesperson stated that “we assume that our inclusion on the UAE list can only be attributable to a mistake. We do not have a presence or any programs in the UAE.”<sup>259</sup> The designation came in the context of an “aggressive and clandestine” lobbying campaign by the UAE to head off the threat of democracy in the Middle East.<sup>260</sup> The UAE designated more than a dozen US and European civil society groups as “terrorist” groups.<sup>261</sup> A spokesperson for the UK’s then Department for International Development (DFID) told media that, “The UK is seeking further clarity from the Emiratis on their rationale for some of these designations.”<sup>262</sup> Peter Osborne, then Chief Political Editor at the conservative British broadsheet, *The Daily Telegraph*, called the designation of IRW “completely ludicrous and defamatory.”<sup>263</sup>

In response to the UAE’s designation of American Muslim civil society groups, the US State Department’s Bureau of Counterterrorism noted that,

*...the criteria used for designations, and procedures for organizations to appeal designations, were opaque. The list included Muslim affinity groups in several Western countries... The US government requested*

250 London TV. “Islamic Relief UK’s Parliamentary Eid Reception Honours the British Muslim Community’s Significant Generosity Following a Year of Unprecedented Emergencies,” May 18, 2023. <https://london-tv.co.uk/islamic-relief-uks-parliamentary-eid-reception-honours-the-british-muslim-communitys-significant-generosity-following-a-year-of-unprecedented-emergencies/>.

251 See, for example, Warsi, Sayeeda. 2015. “Muslims Will Speak up for British Values Only When They Know They Will Be Heard.” *The Guardian*, January 24. <http://www.theguardian.com/world/2015/jan/24/sayeeda-warsi-muslims-british-values>.

252 HRH Prince Charles Gala Dinner Speech. Islamic Relief Worldwide. Accessed July 14, 2023. [https://www.youtube.com/watch?v=MTU7\\_K5cLpM](https://www.youtube.com/watch?v=MTU7_K5cLpM).

253 Janes, William. “Queen ‘Deeply Saddened’ after More than 1,000 Deaths in Pakistan Floods.” *The Independent*, August 29, 2022, sec. UK News. <https://www.independent.co.uk/news/uk/pakistan-united-nations-united-kingdom-president-islamic-relief-b2154864.html>.

254 Krieg, Andreas. *Subversion: The Strategic Weaponization of Narratives*. Washington, D.C.: Georgetown University Press, 2023, Chapter 4.

255 Freer, Courtney Jean. *Rentier Islamism: The Influence of the Muslim Brotherhood in Gulf Monarchies*. New York: Oxford University Press, 2018, 134.

256 On Combating Terrorism Offences, Pub. L. No. UAE Federal Law No. (7) of 2014 (2014). <https://globalfreedomofexpression.columbia.edu/wp-content/uploads/2015/06/UAE-On-Combating-Terrorism-Offences-Federal-Law-No.-7-2014.pdf>.

257 “There Is No Freedom Here: Silencing Dissent in the United Arab Emirates (UAE).” Amnesty International, November 2014, 10. <https://www.amnesty.org/en/documents/mde25/0018/2014/en/>.

258 *Gulf News*. “UAE Publishes List of Terrorist Organisations.” November 15, 2014. <https://gulfnews.com/uae/government/uae-publishes-list-of-terrorist-organisations-1.1412895>.

259 *ReliefWeb*. “Outrage over UAE’s New Terror List - United Arab Emirates.” November 18, 2014. <https://reliefweb.int/report/united-arab-emirates/outrage-over-uaes-new-terror-list>.

260 Delmar-Morgan, Alex, and David Miller. *The UAE Lobby: Subverting British Democracy?* Public Interest Investigations, 2018. <https://research-information.bris.ac.uk/en/publications/the-uae-lobby-subverting-british-democracy>

261 *Gulf News*. “UAE Publishes List of Terrorist Organisations.”

262 *ReliefWeb*. “Outrage over UAE’s New Terror List - United Arab Emirates.”

263 Delmar-Morgan, Alex, and Peter Osborne. “The Continuing War against Islamic Charities.” *The Telegraph*, December 2, 2014. <https://www.telegraph.co.uk/news/religion/11267466/The-continuing-war-against-Islamic-charities.html>; Sam Westrop of the Middle East Forum defended the designation in an opinion column in *The National News*, a UAE-based English language media outlet owned by Sheikh Mansour bin Zayed Al Nahyan, deputy prime minister of the UAE and brother of the current president of the UAE, Sheikh Mohamed bin Zayed Al Nahyan; Westrop, Sam. “Islamic Relief Is a Cog in a Dangerous Machine.” *The National*, July 3, 2018. <https://www.thenationalnews.com/opinion/comment/islamic-relief-is-a-cog-in-a-dangerous-machine-1.746636>.

additional information about the designation by the UAE of two American Muslim affinity groups, which the United States does not consider to be terrorist organizations, and which operate openly in the United States.<sup>264</sup>

IRW emphatically contested its designation but is undoubtedly challenged in pursuing legal recourse in the UAE for the reasons outlined in the statement by the US State Department.<sup>265</sup>

In the summer of 2020, Andrew Norfolk of *The Times* (UK) wrote an exposé on antisemitic Facebook posts made by two serving IRW Trustees.<sup>266</sup> The offensive posts were made in 2014 and 2015 before these individuals joined IRW's board of trustees. It was subsequently found that a senior executive of IRW had posted social media comments in 2015 using antisemitic terms to endorse violent acts of terrorism. This senior executive was working for IRW at the time of his posts. Upon the revelation of these posts, both trustees resigned from their positions at IRW, and the senior executive also resigned from his employment. Within weeks, IRW appointed an entirely new board of trustees.<sup>267</sup>

In March 2023, David Kirkpatrick reported in *The New Yorker* that the exposure of the antisemitic social media posts made by the two IRW trustees and the senior executive was the result of a smear campaign orchestrated by the UAE, with the assistance of Swiss investigative firm, Alp Services (Alp), and US academic Lorenzo Vidino, the Director of George Washington University's Program on Extremism.<sup>268</sup> The source material for Kirkpatrick's article was a data leak of almost 80,000 documents that were later provided to European Investigative Collaborations (EIC), a partnership between investigative journalists from

leading European media outlets, such as *Der Spiegel*, *Mediapart*, *Le Soir*, *El Mundo*, and *NRC*.<sup>269</sup>

European media reported that, on discovering the offending social media posts by the two IRW trustees and the senior executive, Alp passed them on to its paid consultant Lorenzo Vidino. Vidino then passed the posts on to Andrew Norfolk at *The Times* (London) without disclosing Alp's role.<sup>270</sup> Alp director, Mario Brero, notified his intelligence contacts in the UAE: "We channeled our findings to the academic expert Lorenzo Vidino and to the *Times* to be sure to remain completely confidential."<sup>271</sup> Investigative journalists from the EIC characterized Alp's research for the UAE as constituting "a haphazard collection of names and organizations, connected by artificial links to public figures without any logical coherence... [and] based on mere rumors or controversies."<sup>272</sup>

The exposure of the UAE's smear campaign by *The New Yorker* and EIC also rattled the George Washington University's Program on Extremism (GWUPoE). In the aftermath of the revelations about Vidino's role, research analysts Hilary Matfess and Beatrice de Graaf, and fellow, Cynthia Miller-Idriss, renounced their affiliations with GWUPoE. Matfess noted that "I should have done my due diligence about [Vidino's] research and professional activities; I didn't and I regret that."<sup>273</sup> Miller-Idriss replied that, "I refuse to lend legitimacy to an organization [with] such an egregious ethical breach. I too feel I should have done better diligence before agreeing to join, [and] I apologize to all Muslim organizations in particular who were directly harmed by these false, slanderous claims that came from a leader whose organization had my name attached to it."<sup>274</sup> DeGraaf added "...with my name I give legitimacy to an organization that I can no longer support because of Vidino's role... the break with ethical

264 See US Department of State. "Chapter 2. Country Reports: Middle East and North Africa Overview." Accessed September 14, 2023. <https://2009-2017.state.gov/j/ct/rls/crt/2014/239407.htm>

265 "2022 Country Reports on Human Rights Practices: United Arab Emirates." Washington, DC: Department of State, 2022. [https://www.state.gov/wp-content/uploads/2023/02/415610\\_UNITED-ARAB-EMIRATES-2022-HUMAN-RIGHTS-REPORT.pdf](https://www.state.gov/wp-content/uploads/2023/02/415610_UNITED-ARAB-EMIRATES-2022-HUMAN-RIGHTS-REPORT.pdf).

266 Norfolk, Andrew. "Muslim Charity Islamic Relief Feels the Heat Again." *The Times*, July 24, 2020. <https://www.thetimes.co.uk/article/muslim-charity-islamic-relief-feels-the-heat-again-q63vvp1lh>.

267 Hargrave, Russell. "Second Islamic Relief Worldwide Trustee Quits over Social Media Antisemitism." *Civil Society*, August 24, 2020. <https://www.civilsociety.co.uk/news/second-islamic-relief-worldwide-trustee-quits-over-social-media-antisemitism.html>.

268 Kirkpatrick, David D. "The Dirty Secrets of a Smear Campaign." *The New Yorker*, April 3, 2023. <https://www.newyorker.com/magazine/2023/04/03/the-dirty-secrets-of-a-smear-campaign>.

269 European Investigative Collaborations. "About Us." Accessed July 29, 2023. <https://eic.network/blog/about-us>.

270 Kirkpatrick, "Dirty Secrets."

271 Kirkpatrick, "Dirty Secrets."

272 Fayol, Clément, Yann Philippin, and Antoine Harari. "Plus de 200 Français Ont Été Fichés Pour Le Compte Des Services Secrets Des Émirats Arabes Unis." *Mediapart*, July 7, 2023. <https://www.mediapart.fr/journal/international/070723/plus-de-200-francais-ont-ete-fiches-pour-le-compte-des-services-secrets-des-emirats-arabes-unis>.

273 Matfess, Hilary. Twitter Post. March 31, 2023, 11:51 AM. <https://twitter.com/HilaryMatfess/status/1641830536564883458>

274 Miller-Idriss, Cynthia. Twitter Post. April 1, 2023, 5:34 AM. <https://twitter.com/milleridriss/status/1642098128030498816>

standards is too great.”<sup>275</sup> Vidino remains at the helm of GWUPoE.

In recent decades, IRW and its affiliates have been forced to expend significant resources to defend against attacks on their collective reputations by state actors, such as the UAE and Israel. In 2006, Israeli police arrested Islamic Relief aid worker Ayaz Ali on suspicion of aiding Hamas.<sup>276</sup> Ali was detained for three weeks and interrogated by Israel’s Shin Bet security service.<sup>277</sup> After an Israeli military judge ruled that there was insufficient evidence to justify Ali’s continued detention, the Israeli Prime Minister’s office issued a statement saying that Ali had “admitted” to being a “member” of Islamic Relief “which is suspected of supporting Hamas.”<sup>278</sup> A statement issued by Islamic Relief Worldwide vigorously denied the allegations that Ali was aiding Hamas, noting that,

*Islamic Relief does not transfer funds to any organisation in the Palestinian Territories. All its financial transactions are externally audited and also go through rigorous checks both internally and externally by the UK Charities Commission and agencies such as the European Commission who fund Islamic Relief’s work in the Palestinian Territories.*<sup>279</sup>

One explanation offered by an IRW official was that the Israeli officials involved may have confused a well-known hospital in Gaza called *Al-Wafa* with a designated terrorist group, *Jamaiat Al-Wafa LiRayat Al-Musenin*. IRW supplied medical equipment to *Al-Wafa* in 2002 (the hospital has also received funding from the US and UK governments).<sup>280</sup>

The UK’s Department for International Development (DFID) said it had no reason to believe there was any truth in the allegations against Ayaz Ali or Islamic Relief.<sup>281</sup> An independent audit commissioned by Islamic Relief Worldwide in 2021 and led by former UK Attorney General and Conservative Shadow Home Secretary, Dominic Grieve QC, concluded that “there is at present no evidence whatsoever that IRW has departed from its charitable purposes at any time in carrying out its work anywhere.”<sup>282</sup>

On June 19, 2014, Israel’s then-Defense Minister, Moshe Ya’alon, signed a decree banning Islamic Relief from operating in Israel on charges of being “a source of funds for Hamas.”<sup>283</sup> At the time, IRW had been providing aid to approximately 78,000 people in the West Bank.<sup>284</sup> Two days after Ya’alon announced the ban, Israeli police raided Islamic Relief’s West Bank office, smashing computers, destroying furniture, and blowing the office safe apart.<sup>285</sup> IRW contested the Israeli ban and continues to challenge it in Israeli courts.<sup>286</sup>

On December 12, 2014, IRW announced that an independent investigation of its operations in the West Bank found “absolutely no evidence of any links with terrorism” and that “not one of these many audits over many years has found a shred of evidence that Islamic Relief funds terrorism or has terrorist links anywhere in the world.”<sup>287</sup> The independent audit was conducted by KPMG, one of the “Big Four” accounting firms.<sup>288</sup> The Disasters Emergency Committee (DEC) confirmed that it had reviewed KPMG’s audit report and was “...satisfied that Islamic Relief has robust systems in place to ensure aid money is properly accounted for and spent

275 Heck, Wilmer, and Andreas Couwenhoven. “Muslim Brotherhood Expert Played Double Game.” *NRC*, July 9, 2023. <https://www.nrc.nl/nieuws/2023/07/09/deze-expert-over-de-moslimbroeders-speelde-dubbelspel-a4169201>.

276 Urquhart, Conal. “Israeli Secret Agent Threatened to Kill Me, Says Briton.” *The Guardian*, June 3, 2006. <https://www.theguardian.com/world/2006/jun/04/israel>.

277 Urquhart, “Israeli Secret Agent Threatened to Kill Me.”

278 McGreal, Chris. “Israel Accuses British-Funded Islamic Charity of Being Front for Terrorists: Gaza Head Deported and Accused of Funding Hamas: Expulsion a ‘Mixture of Confusion and Malice.’” *The Guardian*, May 31, 2006, sec. Guardian International. <https://www.theguardian.com/society/2006/may/31/voluntarysector:israel>.

279 *Birmingham Post*. “Charity Denies Link to Terror Group.” June 1, 2006. NexisUni.

280 McGreal, “Israel Accuses British-Funded Islamic Charity of Being Front for Terrorists.”

281 Urquhart, “Israeli Secret Agent Threatened to Kill Me.”

282 Grieve QC, Dominic. “Independent Commission into Governance and Vetting within Islamic Relief.” London, UK: Temple Garden Chambers, January 14, 2021, page 25. <https://islamic-relief.org/wp-content/uploads/2022/08/Independent-Commission-Report-29.01.2021.pdf>.

283 *The Jerusalem Post*. “Israel Bans Islamic Relief Worldwide from West Bank Due to Hamas Ties.” June 19, 2014. <https://www.jpost.com/operation-brothers-keeper/israel-bans-islamic-relief-worldwide-from-west-bank-due-to-hamas-ties-359934>.

284 Ramesh, Randeep. “Islamic Relief Defies Israeli Ban and Continues Operations in Palestine.” *The Guardian*, December 11, 2014, sec. Society. <https://www.theguardian.com/society/2014/dec/11/islamic-relief-charity-palestine-work-continues-israel>.

285 *The Guardian*. “Islamic Relief Surveys Office Wreckage after West Bank Raid – Video.” December 12, 2014, sec. World news. <http://www.theguardian.com/world/video/2014/dec/12/islamic-relief-office-wreckage-raid-video>.

286 Kirkpatrick, David D. “The Dirty Secrets of a Smear Campaign.” *The New Yorker*, April 3, 2023. <https://www.newyorker.com/magazine/2023/04/03/the-dirty-secrets-of-a-smear-campaign>.

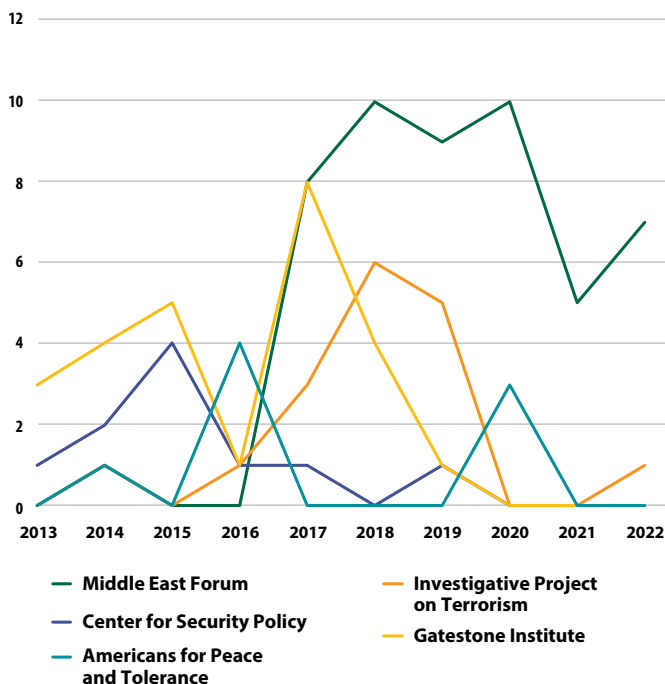
287 Islamic Relief UK. “Independent Investigation of Islamic Relief Operations,” December 12, 2014. <https://www.islamic-relief.org.uk/independent-investigation-of-islamic-relief-operations/>.

288 This was revealed in a Freedom of Information Request to the UK government on the topic of the UAE’s terrorism designation of IRW. The role of KPMG as the auditor of IRW’s activities in the Occupied Territories is noted on page 12. “Digest of Information to Be Released under FOI 0390-17.” UK Government Publishing Service. Accessed August 12, 2023. [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/628907/FOI\\_0390-17\\_Digest.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/628907/FOI_0390-17_Digest.pdf).



appropriately. The DEC is not aware of any evidence that Islamic Relief has used aid funds inappropriately in Israel and the Occupied Palestinian Territories.<sup>289</sup>

**FIGURE 4**  
Total number of articles attacking Islamic Relief Worldwide and Islamic Relief USA published by the five generators, the Middle East Forum, the Investigative Project on Terrorism, the Gatestone Institute, the Center for Security Policy, and Americans for Peace and Tolerance.



Starting in 2017, the US-based non-state *generators* that we identify in this report launched a fresh round of attacks on Islamic Relief Worldwide and Islamic Relief USA (see Figure 4). The attacks that found their way onto Capitol Hill and into the Executive branch repeated manipulated information involving a range of the techniques we identify in Section 3. This manipulated information generated a series of

congressional actions targeting Islamic Relief that we present in detail in Section 4. These activities included:

- A congressional letter to the Silicon Valley Community Foundation calling for it to halt donations to Islamic Relief USA (IRUSA).
- A budget amendment to the Consolidated Appropriations Act of 2017 (H.R.244) introduced by Rep. Ron DeSantis (R-FL) in September 2017 and aimed at denying federal funds to Islamic Relief Worldwide.<sup>290</sup>
- A series of false allegations about Islamic Relief made by *legitimator* M. Zuhdi Jasser in congressional testimony in July 2018, including that “Bangladesh, a Muslim country, does not allow Islamic Relief to do humanitarian work with Rohingya refugees because they’re worried about radicalization.”<sup>291</sup>

In September 2020, Ellie Cohanim, then Deputy Special Envoy to Monitor and Combat Anti-Semitism at the State Department, made a series of erroneous statements about Islamic Relief Worldwide during an interview with *legitimator* Husain Haqqani at the Hudson Institute. Cohanim’s erroneous statements referenced the serious misconduct of two Islamic Relief trustees and a senior executive. However, there were significant errors in Cohanim’s account. For example, Cohanim stated that “the executive director of the organization stepped down because there were Facebook posts of his revealed...”<sup>292</sup> The offensive social media post in question was made by a trustee, not the executive director of IRW, who had issued a statement expressing that he was “appalled” by the “unacceptable posts.”<sup>293</sup> Cohanim also seriously overstated the amount of government funding received by Islamic Relief, claiming that it had collected “over almost one billion euros in donations from the United Nations and governments throughout Europe.”<sup>294</sup> Cohanim also praised the work of Lorenzo Vidino, the Director

289 Price, Matthew. “Audit ‘clears Islamic Relief’ of Terror Funding Claim.” *BBC News*, December 12, 2014. <https://www.bbc.com/news/uk-30443693>.

290 Gosar, Paul, Steve King, Doug Lamborn, Trent Franks, Ted Budd, Chuck Fleischmann, and Ted Poe. “Letter to Dr. Emmett D. Carson, Chief Executive Officer, Silicon Valley Community Foundation,” June 9, 2017. <https://scharinteragmu.wpengine.com/wp-content/uploads/2023/12/Gosar-et-al-SVCF-letter.pdf>; US Congress, House, Amendment to Division G of Rules Committee Print 115–31 offered by Mr. DeSantis of Florida. H.R. 3354 - Department of the Interior, Environment, and Related Agencies Appropriations Act, 2018 [Make America Secure and Prosperous Appropriations Act, 2018]. <https://rules.house.gov/bill/115/hr-3354>.

291 We explain in Section 2.2.2 why this statement is false. See US Congress, House, *The Muslim Brotherhood’s Global Threat, Before the Subcommittee on National Security of the Committee on Oversight and Government Reform*, 115th Congress, (2018) (statement of M. Zuhdi Jasser). <https://www.govinfo.gov/content/pkg/CHRG-115hhrg31367/html/CHRG-115hhrg31367.htm>.

292 The Hudson Institute. “Transcript: A Conversation with Assistant Special Envoy Ellie Cohanim on Combating Anti-Semitism.” September 18, 2023. <https://www.hudson.org/human-rights/transcript-a-conversation-with-assistant-special-envoy-ellie-cohanim-on-combating-anti-semitism>.

293 Holmes, Oliver. “Islamic Relief Head ‘appalled’ by Antisemitic Posts by Board Member.” *The Guardian*, July 24, 2020, sec. Society. <https://www.theguardian.com/society/2020/jul/24/islamic-relief-head-appalled-by-antisemitic-posts-by-board-member>.

294 The Hudson Institute. “Transcript: A Conversation with Assistant Special Envoy Ellie Cohanim.”

of George Washington University's Program on Extremism, in uncovering the antisemitic social media posts. Cohanim appeared to be unaware that the offending social media posts were discovered by Alp Services, a Swiss consultancy firm in the pay of the UAE intelligence services, who then passed them on to Vidino, who passed them on to Andrew Norfolk of *The Times* (UK).

On December 30, 2020, Cohanim's office released a statement that recounted the case of the antisemitic social media posts by two IRW trustees and a senior executive, which were revealed during the UAE's smear campaign. The statement did not account for the substantial remedial actions that Islamic Relief had taken in response to these serious allegations of misconduct. The statement ended "We encourage all government bodies currently examining [sic] IRW activities and their relationship with IRW."<sup>295</sup> This is a variant of the guilt by association fallacy in that it assumes that the misconduct of three senior personnel reflects the institutional values of a global organization of several thousand employees. An independent audit conducted by former UK Attorney General and Conservative Shadow Home Secretary, Dominic Grieve, found no evidence of institutionalized antisemitism at Islamic Relief Worldwide.<sup>296</sup> The statement issued by Cohanim's office remains archived on the State Department's website and it features prominently in online searches for Islamic Relief.

The harmful effects of manipulated information on targeted organizations, such as Islamic Relief, are significant. The need to implement countermeasures to mitigate reputational risks involves diverting funds from grave humanitarian needs to expanding communications, public relations, and lobbying functions. The accumulation and continued circulation of manipulated information feeds into databases created to manage banking risk, causing banks to close or refuse to open accounts.<sup>297</sup> In certain instances, manipulated information about the intentions of

humanitarian relief and development aid agencies creates an atmosphere of distrust that threatens the security of employees.

This case study demonstrates how attacks by state and non-state actors are mutually reinforcing and cumulative. A questionable terrorist designation by a foreign government, orchestrated smear campaigns, and allegations by state actors based on secret evidence or no evidence at all, accumulate over time and are in turn marshaled by like-minded non-state actors to launch further attacks. Lobbying on Capitol Hill by *generators* such as the Middle East Forum has resulted in members of Congress amplifying manipulated information, with allegations lingering in the public record and accumulating over time. Islamic Relief was the primary target of attacks during the 115<sup>th</sup> and 116<sup>th</sup> Congresses. In subsequent Congresses, the *generators* shifted their focus to the second largest Muslim-led humanitarian INGO, Helping Hand for Relief and Development.

## 6.2 Helping Hand for Relief and Development – Anatomy of a Capitol Hill Information Manipulation Attack

Helping Hand for Relief and Development (HHRD) was founded in 2005 in Houston, Texas. In 2021, HHRD recorded revenue of \$80.2 million dollars up from \$67.5 million the prior year, cementing its status as a rapidly growing Muslim-led humanitarian relief and development agency.<sup>298</sup> HHRD echoes mainstream aid discourses on universalism, emphasizing common humanity as a basis for assistance rather than religious solidarity.<sup>299</sup> It partners with international organizations, such as the World Health Organization and the World Food Program to deliver humanitarian aid in precarious contexts, such as in Khyber Pakhtunkhwa, Pakistan.<sup>300</sup> HHRD has received modest funding from USAID, but most of its funding comes

295 United States Department of State. "Islamic Relief Worldwide." Accessed September 9, 2023. <https://2017-2021.state.gov/islamic-relief-worldwide/>. Archived.

296 Sherwood, Harriet. "Report Clears Muslim Charity of Institutional Antisemitism." *The Guardian*, January 29, 2021, sec. Society. <https://www.theguardian.com/society/2021/jan/29/charity-islamic-relief-worldwide-exonerated-antisemitism-inquiry>; Grieve QC, Dominic. "Independent Commission into Governance and Vetting within Islamic Relief." London, UK: Temple Garden Chambers, January 14, 2021. <https://islamic-relief.org/wp-content/uploads/2022/08/Independent-Commission-Report-29.01.2021.pdf>.

297 Charity & Security Network. "World-Check: The Dangers of Privatizing Terrorist Lists - Charity & Security Network," February 11, 2016. [https://charityandsecurity.org/financial-access/worldcheck\\_private\\_databases\\_raise\\_concerns/](https://charityandsecurity.org/financial-access/worldcheck_private_databases_raise_concerns/).

298 "IRS 990 - Return of Organization Exempt from Income Tax." Helping Hand for Relief and Development, 2020; "IRS 990 - Return of Organization Exempt from Income Tax." Helping Hand for Relief and Development, 2021.

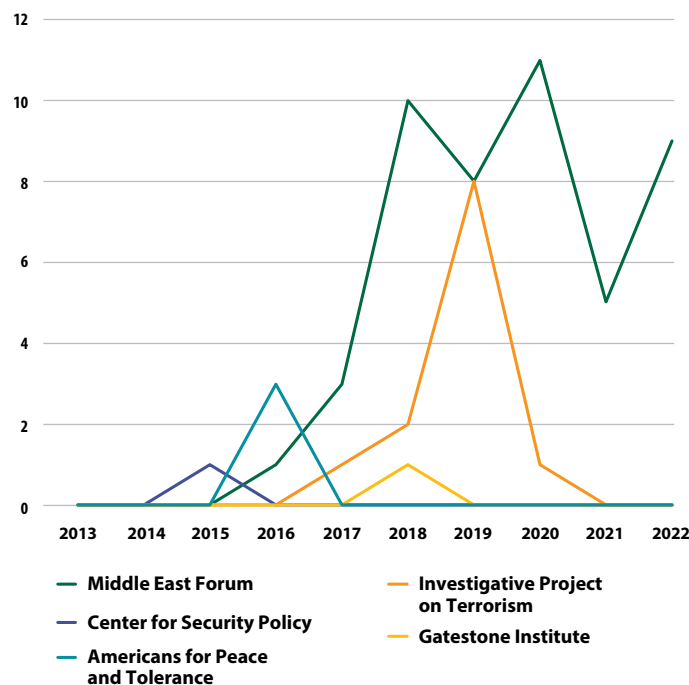
299 "Annual Report 2014-2015." Helping Hand for Relief and Development, 2015. [https://hhrd.org/AnnualReport/HHRDAnnualreportApril14\(SS\).pdf](https://hhrd.org/AnnualReport/HHRDAnnualreportApril14(SS).pdf).

300 Shahbaz, Babar, Qasim Ali Shah, Abid Q. Suleri, Steve Commins, and Akbar Ali Malik. "Livelihoods, Basic Services and Social Protection in North-Western Pakistan." Working Paper 5. Sustainable Development Policy Institute, August 2012. <https://cdn.odi.org/media/documents/7782.pdf>.

from donations from individual donors across the United States where it has 13 regional offices.<sup>301</sup> Like Islamic Relief USA, HHRD regularly achieves Charity Navigator's highest 4-star rating.<sup>302</sup> It is a BBB-accredited charity and a participant in the Combined Federal Campaign.<sup>303</sup>

Given its relative organizational youth and lower profile in comparison to Islamic Relief Worldwide, HHRD does not have the same documented history of tension with state actors. According to our analysis, *generator* attacks on HHRD commenced in 2015 and 2016 when the Center for Security Policy and Americans for Peace and Tolerance (APT) published several articles attacking the Muslim-led INGO (see Figure 5).<sup>304</sup> In early 2018, Sam Westrop at MEF launched a series of attacks on HHRD, with the first carried in the Pakistani media outlet *Rabwah Times*.<sup>305</sup> This initial article, "American Islamist Charity Openly Partners with Designated Terrorists," accused HHRD of "organizing a conference" with Falah-i-Insaniat Foundation (FIF) as a "sponsor."<sup>306</sup> The source for Westrop's article does not substantiate his allegation that the FIF had a sponsorship role, never mind "openly partnering," in a "conference" organized by HHRD.<sup>307</sup> The source of this allegation, an uncredited *Frontier Post* report titled "Steps for betterment of special persons urged," names seven people who are reported to have addressed the "participants" at a "function" in the Lower Dir District of Khyber Pakhtunkhwa, Pakistan, in December 2017.<sup>308</sup> The uncredited author then reports a series of statements that were made at the function but paraphrases rather than quotes the speakers. More importantly, the paraphrased statements are not attributed to their respective speakers.

**FIGURE 5**  
Total number of articles attacking Helping Hand for Relief and Development published by five generators, the Middle East Forum, the Investigative Project on Terrorism, the Gatestone Institute, the Center for Security Policy, and Americans for Peace and Tolerance.



In Table 5, we perform a line-by-line analysis of Sam Westrop's article, "American Islamist Charity Openly Partners with Designated Terrorists," using the framework developed in Section 3 to highlight the information manipulation techniques used.

301 "Annual Report 2014-2015." Helping Hand for Relief and Development.

302 "Charity Navigator - Rating for Helping Hand for Relief and Development." Accessed September 9, 2023. <https://www.charitynavigator.org/ein/311628040>.

303 The Combined Federal Campaign is the official workplace-giving campaign for federal employees and retirees. The CFC is overseen by the Office of Personnel Management (OPM). Nonprofits that participate in the CFC must provide the OPM with specific information about the organization's accounting, governance, and program functions.

304 APT's content is not credited to specific authors, so we cannot definitively say that Sam Westrop authored the APT's attacks on HHRD in 2016, but we do know that Westrop was working for APT at the time of these initial attacks.

305 For Westrop's article, see Westrop, Sam. "American Islamist Charity Openly Partners with Designated Terrorists." *Rabwah Times*, January 4, 2018. <https://www.rabwah.net/american-islamist-charity-openly-partners-designated-terrorists%E2%80%A8/>.

306 Westrop, "American Islamist Charity Openly Partners."

307 *Frontier Post*. "Steps for Betterment of Special Persons Urged." December 4, 2017. <https://thefrontierpost.com/steps-betterment-special-persons-urged/>.

308 The month and day of the event is not communicated in the body of the article, as it now stands, but a copy retrieved from the Internet Archive reveals that it was previously dated to December 4, 2017. See *Frontier Post*. "Steps for Betterment of Special Persons Urged."

TABLE 5

**Analyzing Sam Westrop's *Rabwah Times* article "American Islamist Charity Openly Partners with Designated Terrorists," January 4, 2018.**

**"In December, the Muslim American charity, Helping Hand for Relief and Development (HHRD), organized a conference to honor 'World Disability Day' at a government-managed college in the Pakistani city of Timergara."**

**Misrepresentation:** Mischaracterizing a situation or an opponent's position in such a way as to distort understanding

**Commentary:** Westrop manipulates information from the *Frontier Post* by characterizing the event as a "conference." The word "conference" has connotations of formality and exchange that are not supported by the source. There is some dispute over the location of the event in question. The *Frontier Post* article claims the event was held at the Government College of Commerce and Management Sciences while HHRD's outside counsel claims the event was held at a Comprehensive Rehabilitation Center.<sup>309</sup> We are unable to determine the correct location of the function.

**"This seems like a noble cause. But Islamist groups often use noble causes to advance their agenda."**

**Conspiratorial thinking:** Proposing that a secret plan exists to implement a nefarious scheme and/or ascribing nefarious motivations or intent to unexceptional people, organizations, occurrences, or events.

**Commentary:** Without providing any evidence, Westrop suggests that an event to honor disabled people in Timergara, Pakistan, involves a covert "Islamist" agenda.

**"And HHRD is one such Islamist group."**

**Smearing by collocation:** Collocation of the target organization with a word or expression associated with a negative phenomenon in the mind of the intended audience (in this case, "Islamist"). This technique is based on the exploitation of prejudices and stereotypes, as the label created qualifies the target organization as something that the author and the intended audience finds suspicious or undesirable.

**Commentary:** HHRD's primary focus is on humanitarian assistance and community development rather than political or religious ideologies. It primarily operates in Muslim-majority countries and communities but serves people regardless of their religion, ethnicity, or nationality. There is no evidence that HHRD operates in any sense as an "Islamist charity" and it does not identify as such.

(continued on following page)

<sup>309</sup> See *Frontier Post*. "Steps for Betterment of Special Persons Urged." For the letter from HHRD's outside counsel, see "Response to Congressman Jim Banks of Indiana; Letter to Ambassador Nathan Sales, Coordinator of Counterterrorism, US State Department," December 2, 2019. <https://scharinteragmu.wpengine.com/wp-content/uploads/2023/12/PC-Memo-HHRD.pdf>.

**“Sponsors of the HHRD event in Pakistan included the Falah-e-Insaniat Foundation (FIF), the charitable wing of Lashkar-e-Taiba, the terrorist organization responsible for the 2008 Mumbai attacks. In 2016, FIF itself was designated a terrorist organization by the US Treasury Department.”**

**Misrepresentation and guilt by association:** Spuriously connecting target organization(s) to a demonized group of people or a “bad person” to discredit it. Connections are often insignificant, involving individuals happening to be in the same place at the same time. This may also include tying organizations or individuals together with several degrees of separation.

**Commentary:** Humanitarian relief organizations often operate in politically fragile geographies, with great exposure to risk, including difficulties involved in determining the affiliations of actors who may or may not be affiliated with designated entities. FIF is not identified as a “sponsor” of the event in the *Frontier Post* article. The presence of an individual from FIF at the event in question is used to attempt to confer guilt on HHRD. Here, the assumption is made that HHRD personnel in the field were able to exercise control over who attended this event, and identify their affiliations, which is not evident. This is also a guilt by association fallacy in that Westrop then attempts to tie HHRD to *Lashkar-e-Taiba*, the armed wing of FIF.

**“Another organization present at the HHRD conference was the Milli Muslim League, a political party recently launched by Lashkar-e-Taiba founder, Hafiz Muhammad Saeed, on whom the US government has placed a \$10 million bounty.”**

#### **Guilt by association**

**Commentary:** This information manipulation involves another guilt by association fallacy that attempts to tie HHRD, over several degrees of separation, to *Lashkar-e-Taiba* and Hafiz Muhammad Saeed, a Specially Designated Global Terrorist.

**“But HHRD didn’t stop at Pakistan’s most infamous terrorist network. Its conference also included Al Khidmat, the charitable arm of the South Asian Islamist movement Jamaat-e-Islami.”**

#### **Smearing by collocation / Misrepresentation / Guilt by association / Conflation**

**Commentary:** This information manipulation involves collocating HHRD with the phrase “infamous terrorist network” to qualify HHRD as suspicious or undesirable. The characterization of the event as a “conference” is not faithful to the original source and has connotations of formality and exchange that are not warranted. *Al-Khidmat* is a mainstream charity in Pakistan that has built a reputation for its relief efforts, especially after the 2005 earthquake in Kashmir and the 2010 floods.<sup>310</sup> Westrop is correct that *Al-Khidmat* is the charitable arm of the Islamist *Jama’at-i Islami* political party in Pakistan. However, he conflates the various national manifestations of *Jama’at-i Islami* into a single “South Asian Islamist movement.” *Jama’at-i Islami* Pakistan appears to be committed to electoral politics but is a niche political force.<sup>311</sup> Neither *Al-Khidmat* nor *Jama’at-i Islami* are designated entities.

(continued on following page)

310 See Ullah, Haroon K. *Vying for Allah’s Vote: Understanding Islamic Parties, Political Violence, and Extremism in Pakistan*. South Asia in World Affairs Series. Washington, DC: Georgetown University Press, 2014, 85.

311 Iqtidar, Humeira. *Secularizing Islamists? Jama’at-e-Islami and Jama’at-Ud-Da’wa in Urban Pakistan*. South Asia across the Disciplines. Chicago: The University of Chicago Press, 2011, Chapter 2; Mandaville, Peter G. *Islam and Politics*. Second edition. New York, NY: Routledge, 2014, 240-41.

**In 1971, during the Bangladeshi Liberation War, Jamaat-e-Islami fighters murdered thousands of Bangladeshis in cold blood.**

### Misrepresentation / Guilt by association / Temporal locking

**Commentary:** The use of words like “murdered” and “in cold blood” is provocative. This sentence also combines a guilt by association fallacy with temporal locking. Westrop uses this variant of a genetic fallacy to tie HHRD, an American Muslim humanitarian relief organization in the present day, to a half-century old history of *Jama’at-i Islami* fighters, then aligned with West Pakistani forces, who have been accused of causing atrocities during the Bangladeshi Liberation War. HHRD rejects the assertion that it is “part of *Jamaat-e-Islami’s* international network.”<sup>312</sup> While Nasr (1994) identifies ICNA, HHRD’s sister organization, as the North American manifestation of *Jama’at-i Islami*, HHRD can also be seen as representing part of a diasporic process of establishing successor organizations that promote harmonious coexistence between Islamic principles and life as an American citizen.<sup>313</sup>

**In 2006, JI’s own website announced that Al Khidmat had transferred \$100,000 to the Palestinian terror group Hamas for their “just Jihad.”**

### Conspiratorial thinking / Guilt by association

**Commentary:** It is not particularly noteworthy that *Al-Khidmat* transferred funds to Hamas in 2006 given that several US-allied Middle Eastern governments and international organizations moved to fund Hamas in the wake of its electoral victory in January 2006.<sup>314</sup> This is an attempt to tie HHRD to Hamas through an unexceptional independent action taken by a third party, *Al-Khidmat*, in 2006.

**“HHRD does not merely invite Al Khidmat to its conferences. Al Khidmat openly boasts of the support it receives from HHRD.”**

### Misrepresentation

**Commentary:** *Al-Khidmat* is a mainstream charity in Pakistan that is identified with the *Jama’at-i Islami* political party. Westrop’s link to Facebook content cannot be evaluated as it is broken and cannot be otherwise retrieved.

**“In fact, HHRD appears to have been working with both Al Khidmat and Hafiz Saeed’s designated terrorist group, the Falah-e-Insaniat Foundation, for many years. A 2009 HHRD report mentions both organizations...”**

### Guilt by association / Misrepresentation.

**Commentary:** Humanitarian relief organizations often operate in politically fragile geographies, with great exposure to risk given the difficulties involved in determining whether the individuals they interact with may be affiliated with designated entities. The “2009 HHRD report” to which Westrop links only demonstrates that FIF was, as of April 2009, one of several “organizations working in the area” of the Lower Dir district in the Khyber Pakhtunkhwa province of Pakistan. There is no indication in the original source that HHRD was “working with” FIF in the area. Even if that were the case, FIF was not a US designated entity in April 2009.<sup>315</sup>

(continued on following page)

312 “Response to Congressman Jim Banks of Indiana; Letter to Ambassador Nathan Sales, Coordinator of Counterterrorism. US State Department,” December 2, 2019. <https://scharinteragmu.wpengine.com/wp-content/uploads/2023/12/PC-Memo-HHRD.pdf>.

313 Nasr, Seyyed Vali Reza. *The Vanguard of the Islamic Revolution: The Jama’at-i Islami of Pakistan*. Comparative Studies on Muslim Societies 19. Berkeley: University of California Press, 1994. Mandaville, Peter G. *Islam and Politics*. Second edition. New York, NY: Routledge, 2014, 409-10.

314 Nasrawi, Sarah. “Arabs to discuss funding Hamas-led government despite US opposition”. *Associated Press International*. February 19, 2006 Sunday. *NexisUni*.

315 See US Department of State. “Secretary of State’s Terrorist Designation of Falah-i-Insaniat Foundation.” Accessed September 14, 2023. <https://2009-2017.state.gov/r/pa/prs/ps/2010/11/151931.htm>.

**“...and a Pakistani newspaper report reveals both HHRD and the Falah-e-Insaniat Foundation were working on the same projects.”**

#### Irrelevant citation

**Commentary:** The link provided leads to a website that is irrelevant to the claim.

**“Founded in 2005, HHRD reports receiving funding from the British government, the World Health Organization and prominent American charitable foundations such as Microsoft, Cisco, PepsiCo, and Dell.”**

**Commentary:** This is confirmed on [ICNA’s homepage](#).

**HHRD operates as a self-described “sister organization” of the Islamic Circle of North America (ICNA), a prominent American Islamist group that has publicly identified itself as a Jamaat-e-Islami organization. HHRD and ICNA even share the same logo.**

#### Conspiratorial thinking / Temporal and spatial locking

**Commentary:** ICNA represents a North American manifestation of diasporic South Asian Islamic revivalism, only weakly and informally connected to *Jama’at-i Islami Pakistan*. The beliefs and practices of American Muslims of South Asian descent should not be locked in time and space to those of *Jama’at-i Islami Pakistan*.

**“ICNA’s conferences, the largest in the American Muslim calendar, include prominent Jamaat-e-Islami officials such as Yusuf Islahi, who reportedly claims that Jews were responsible for the 9/11 attacks.”**

#### Guilt by association / Conflation / Cherry picking / Temporal locking

**Commentary:** This information manipulation attempts to tie HHRD to repugnant views expressed during a conference in India by an elderly leader of *Jama’at-i Islami Hind* (the independent Indian branch of *Jama’at-i Islami*) over 20 years ago. Westrop conflates the various independent national manifestations of *Jama’at-i Islami* into a single entity. He then cherry picks a repugnant belief reported to have been expressed at one point in time by Yusuf Islahi. This information manipulation also temporally locks Yusuf Islahi’s opinion and assumes that it had not changed by the time he addressed the ICNA conference, which appears to have occurred more than a decade later. There is no indication that ICNA ever endorsed this opinion.

**“Counter-terrorism analyst Abha Shankar recently noted that HHRD is working with ICNA and Al Khidmat to establish a hospital in the Pakistani city of Karachi.”**

#### Cross-posting / Smearing by collocation

**Commentary:** This information manipulation involves cross-posting to a *co-generator*, the Investigative Project on Terrorism. Locating HHRD as the object of analysis of a “counter-terrorism analyst” is a smear by collocation. ICNA represents a North American manifestation of diasporic South Asian Islamic revivalism, only weakly and informally connected to the *Jama’at-i Islami Pakistan*. The beliefs and practices of American Muslims of South Asian descent should not be locked in time and space to those of *Jama’at-i Islami Pakistan*. *Al-Khidmat* is a mainstream Pakistani charity and is not a designated organization.

(continued on following page)

**“Shankar discovered that the Al Khidmat official leading the project is ‘closely tied to the US-designated Kashmiri terrorist organization, Hizbul Mujahideen (HM) and its leader Syed Salahuddin.’”**

### Misrepresentation / Guilt by association / Crossposting

**Commentary:** This information manipulation misrepresents the *Al-Khidmat* official in question as “leading the project.” However, the source material only supports that the official in question said that *Al-Khidmat* “would also support Helping Hand for Relief and Development in establishing the rehabilitation center.”<sup>316</sup> HHRD has no control over individuals that express support for its projects. In the IPT article to which Westrop cross-posts, co-generator Abha Shankar asserts that the official “is closely tied to the US-designated Kashmiri terrorist organization, *Hizbul Mujahideen* (HM)” but provides a series of citations that do not substantiate this assertion. Shankar does provide a link, now broken, that when recalled through the Internet Archive, reports that Rehman stated in February 2017 that, “Jihad is the only way forward to liberate occupied Jammu and Kashmir.”<sup>317</sup> In the same article, Rehman also appears to have paid tribute to Burhan Muzaffar Wani, a deceased commander of *Hizbul Mujahideen* (HM). This expression of support does not substantiate Shankar’s claim that the *Al-Khidmat* official is “closely tied” to HM.

**“HHRD’s dalliances with these violent Islamist networks are not limited to Pakistan. For many years, HHRD has regularly organized fundraising evenings and events at the Islamic Center of New England (ICNE), which is notorious for its regular promotion of extremist clerics.”**

### Guilt by association / Circular reporting / Conflation

**Commentary:** We identify three events that HHRD have held in conjunction with ICNE, a Fundraising Banquet to benefit “Africa Drought Relief” (6/17/2017), a RAMADAN BANQUET Benefiting Water for Life (6/26/2016), and a “benefit dinner to empower women” (4/19/2015). Westrop links to one of his own articles to substantiate his claims. Westrop’s interpretation of the source material involves conflating religious conservatism with “extremism.”

**“The former imam of ICNE was Hafiz Masood, the brother of the very same Lashkar-e-Taiba leader, Hafiz Muhammad Saeed. Today, Masood serves as a spokesperson for one of his brother’s terrorist organizations in Pakistan.”**

### Guilt by association / Temporal locking

**Commentary:** Court documents confirm that Hafiz Masood was the imam of ICNE from 1998 to 2006.<sup>318</sup> However, HHRD’s events at ICNE were held almost a decade after Masood’s departure from the Mosque. Masood was deported from the US in 2008, after pleading guilty to visa-related violations.<sup>319</sup> A 2012 report in *The Washington Post* confirms the account that Masood is Hafiz Muhammad Saeed’s brother and that Masood is now a spokesperson for *Jama’at-ud-Dawa* (a US designated charitable arm of the Pakistani militant group *Lashkar-e-Taiba*).<sup>320</sup> In *The Washington Post*’s account, Rabbi Barry Starr of Temple Israel in Sharon, MA, described Masood as “a positive influence on the community, and I didn’t think it made a whole lot of sense to deport him... I found him to be a gentleman, a gentle person, a person of peace.”<sup>321</sup> Director of Research, Ilya Feoktistov, of generator Americans for Peace and Tolerance, recounted that “there are many dots connecting Masood and his associates to terrorist activity in the city, past and present.”<sup>322</sup>

316 “US-Based Charity Announces Establishment of Rehab Center – Islamic Circle of North America (ICNA).” Accessed September 15, 2023. <https://icna.org/us-based-charity-announces-establishment-of-rehab-center/>.

317 Hizb-ul-Mujahideen. “Jihad Only Way to Liberate Kashmir: JI,” February 6, 2017. Internet Archive. [https://web.archive.org/web/20180131205734/http://www.hizbmedia.org/06%20February%202017\(a\).php](https://web.archive.org/web/20180131205734/http://www.hizbmedia.org/06%20February%202017(a).php).

318 United States of America v. Muhammad Masood, No. 1: 07 CR 10259-001-DPW (US District Court - District of Massachusetts February 28, 2008).

319 Leiby, Richard. “Pakistani Brothers Reflect Their Country’s Contradictions - The Washington Post.” *The Washington Post*, October 28, 2012. [https://www.washingtonpost.com/world/pakistani-brothers-reflect-their-countrys-contradictions/2012/10/28/f29af3ea-1c52-11e2-8817-41b9a7aaabc7\\_story.html](https://www.washingtonpost.com/world/pakistani-brothers-reflect-their-countrys-contradictions/2012/10/28/f29af3ea-1c52-11e2-8817-41b9a7aaabc7_story.html).

320 Leiby, “Pakistani Brothers.”

321 Leiby, “Pakistani Brothers.”

322 Singman, Brooke. “Moderate Imam Reveals How Radicals Won Battle for Soul of Boston Mosques.” *Fox News*, July 22, 2015. Internet Archive. <https://web.archive.org/web/20150722225529/https://www.foxnews.com/us/2015/07/22/moderate-imam-reveals-how-radicals-won-battle-for-soul-boston-mosques/>.



The connections drawn between HHRD and a variety of designated groups found in Westrop's January 2018 *Rabwah Times* article that manipulated information from various sources including the December 2017 *Frontier Post* article spread through an array of media outlets, including prominent Indian media organizations, such as *The Times of India*, *The Economic Times*, *Firstpost*, and *ThePrint* (see Table 6). The false connections drawn between HHRD and designated groups potentially endangers HHRD staff working on life saving programs in Kashmir and elsewhere in the subcontinent.

**TABLE 6**  
**Assertions of a link between HHRD and various designated groups made in Indian media—  
a cycle of manipulated information.**

Date	Media Outlet	Author(s)	Source
1/26/18	India Today	Ankit Kumar	<a href="#">LINK</a>
9/25/18	Hindu Post	Abha Shankar and Sam Westrop	<a href="#">LINK</a>
3/3/19	The Indian Express	Uncredited	<a href="#">LINK</a>
3/12/19	Hindu Post	Sam Westrop	<a href="#">LINK</a>
5/10/19	DailyO	Sam Westrop	<a href="#">LINK</a>
11/15/19	The Economic Times	Uncredited	<a href="#">LINK</a>
12/10/19	ThePrint	Clifford Smith and Sam Westrop	<a href="#">LINK</a>
12/15/19	OpIndia	Uncredited	<a href="#">LINK</a>
4/4/20	DT Next	Uncredited	<a href="#">LINK</a>
5/10/20	Organiser	Gary C. Gambill	<a href="#">LINK</a>
1/5/21	The Times of India	Uncredited	<a href="#">LINK</a>
1/5/21	India.com	Victor Dasgupta	<a href="#">LINK</a>
1/5/21	Sentinel Assam	Uncredited	<a href="#">LINK</a>
1/6/21	OpIndia	Uncredited	<a href="#">LINK</a>
6/1/21	Kashmir Central	Uncredited	<a href="#">LINK</a>
6/4/21	Firstpost	Sam Westrop and Martha Lee	<a href="#">LINK</a>
6/14/21	OpIndia	Uncredited	<a href="#">LINK</a>
6/15/21	ANI	Uncredited	<a href="#">LINK</a>
11/17/21	OpIndia	Uncredited	<a href="#">LINK</a>
2/2/22	India Narrative	Ahmed Ali Fayyez	<a href="#">LINK</a>
3/10/22	The New Indian Express	Uncredited	<a href="#">LINK</a>
4/23/22	Firstpost	Abhijit Majumder	<a href="#">LINK</a>
1/27/23	OrissaPOST	Uncredited	<a href="#">LINK</a>
1/27/23	The Times of India	Uncredited	<a href="#">LINK</a>
1/27/23	The Tribune	Uncredited	<a href="#">LINK</a>
1/28/23	OpIndia	Uncredited	<a href="#">LINK</a>
1/29/23	Firstpost	Abhijit Majumder	<a href="#">LINK</a>
2/11/23	The Sunday Guardian	Abhinandan Mishra	<a href="#">LINK</a>
6/25/23	The Sunday Guardian	Sam Westrop	<a href="#">LINK</a>

MEF also continued to repeat the false and misleading allegations in Westrop's *Rabwah Times* article in its own blogs and articles, many of which were then reflected in Indian media coverage. This created a cycle of manipulated information, creating the conditions for circular reporting and false corroboration by making it appear as if there was a consensus or substantive evidence for MEF's claims.

Starting in February 2019, HHRD found itself facing political attacks in the halls of Congress—attacks based on manipulated information produced by Sam Westrop and posted across the Middle East Forum and the Investigative Project on Terrorism sites.<sup>323</sup> In the 117<sup>th</sup> and 118<sup>th</sup> Congresses, Sam Westrop’s article in the *Rabwah Times* became the foundation for a series of legislative actions, one building upon the next. These legislative actions, detailed in Section 4 of this report, included:

- The February 2019 introduction by Rep. Jim Banks (R-IN) of H.R. 160, “expressing concern about the threat posed to democracy and human rights by theocratic groups operating in South Asia.”<sup>324</sup> Based on Sam Westrop’s manipulation of information in the *Rabwah Times* article, Rep. Banks’ resolution falsely claimed that HHRD had “openly partnered in 2017 with Pakistan’s *Falah-i-Insaniat* Foundation.”<sup>325</sup>
- On November 1, 2019, three members of Congress called for the State Department’s Coordinator for Counterterrorism, Ambassador Nathan Sales, to launch an investigation into HHRD.<sup>326</sup> Based on Sam Westrop’s reporting, the letter to Ambassador Sales tied HHRD to the *Falah-i-Insaniat* Foundation and *Al-Khidmat* (which is not a designated entity).

On December 2, 2019, responding to these allegations, HHRD’s outside counsel sent a letter to Rep. Jim Banks (R-OH) explaining that:<sup>327</sup>

- On December 3, 2017, HHRD participated in a celebration of the International Day of Persons with Disabilities as part of the Children with Disability Program at a Comprehensive Rehabilitation Center in Low Dir, KP, in Pakistan.

- Red Crescent Pakistan and Friends of Paraplegics were also participating sponsors.
- During the event, a member of the local Chamber of Commerce and Industry invited Mr. Qari Rehmat Ullah, a person affiliated with FIF, to attend and stand on stage during the distribution of gifts to the disabled children.
- Neither FIF, LeT nor Mr. Ullah contributed as a sponsor or spoke publicly at the event.
- HHRD had no control over or involvement with the presence of Mr. Ullah.

After this event, the letter says, HHRD instituted a policy “to obtain a list of pre-approved individuals who will be allowed to be present at any event sponsored or co-sponsored by or in collaboration with HHRD.”<sup>328</sup>

However, despite HHRD’s explanation of the events in question, members of Congress continued to act on Westrop’s manipulated information.

- In January 2022, Rep. Scott Perry (R-PA) wrote a letter to President Biden that cited the Middle East Forum’s manipulated information in tying HHRD to the *Falah-i-Insaniat* Foundation (FIF).<sup>329</sup>
- In March 2022, three members of Congress sent a letter to Attorney General Merrick Garland that again falsely tied HHRD to *Lashkar-e-Taiba* (LeT) by citing the prior congressional letter to Ambassador Nathan Sales and a November 2019 article in the *Washington Examiner* written by Cliff Smith and Sam Westrop of MEF.<sup>330</sup>

323 See Westrop, Sam. “American Islamist Charity Openly Partners with Designated Terrorists.” Middle East Forum, January 4, 2018. <https://web.archive.org/web/20221208104725/https://www.meforum.org/7144/american-islamist-charity-partners-with-terrorists>; see also Westrop, Sam. “American Islamist Charity Openly Partners with Designated Terrorists.” The Investigative Project on Terrorism. Accessed September 15, 2023. <https://web.archive.org/web/20230812012327/https://www.investigativeproject.org/7203/american-islamist-charity-openly-partners-with>.

324 US Congress, House, *Expressing concern about the threat posed to democracy and human rights by theocratic groups operating in South Asia*. H.R. 160, 116th Congress, Introduced in House February 28, 2019. <https://www.congress.gov/bill/116th-congress/house-resolution/160/text>

325 The *Falah-i-Insaniat* Foundation (FIF) was a charitable arm of the radical Kashmiri-based Islamist group *Lashkar-e-Taiba*. Both organizations are designated as terrorist groups in the US. FIF was banned in Pakistan in 2019. Westrop, Sam. “American Islamist Charity Openly Partners with Designated Terrorists.” *Rabwah Times*, January 4, 2018. <https://www.rabwah.net/american-islamist-charity-openly-partners-designated-terrorists%E2%80%A8/>.

326 The signatories of the letter to Ambassador Sales were Representatives Jim Banks (R-IN), Chuck Fleischmann (R-TN), and Randy Weber (R-TX). See Banks, Jim, Chuck Fleischmann, and Randy Weber. “Letter to Ambassador Nathan Sales, Coordinator for Counterterrorism, U.S. Department of State,” November 1, 2019. <https://scharinteragmu.wpengine.com/wp-content/uploads/2023/12/Banks-et-al-letter-to-Amb-Sales.pdf>.

327 “Response to Congressman Jim Banks of Indiana; Letter to Ambassador Nathan Sales, Coordinator of Counterterrorism. US State Department,” December 2, 2019. <https://scharinteragmu.wpengine.com/wp-content/uploads/2023/12/PC-Memo-HHRD.pdf>.

328 See “Response to Congressman Jim Banks.”

329 Westrop, Sam. “A Terror Supporter Goes to Washington.” *National Review*, November 15, 2021. <https://www.nationalreview.com/2021/11/a-terror-supporter-goes-to-washington/>.

330 The signatories of the letter to AG Garland were Representatives Gregory Steube (R-FL), Mary Miller (R-IL), and Scott Perry (R-PA). See Smith, Cliff, and Sam Westrop. “When South Asian and American Radicals Collide, Congress Takes Notice.” *Washington Examiner*, November 20, 2019. <https://web.archive.org/web/20230628194728/https://www.washingtonexaminer.com/opinion/op-eds/when-south-asian-and-american-radicals-collide-congress-takes-notice>.

- On May 5, 2022, House Foreign Affairs Committee staff sent an email to USAID's Bureau for Legislative and Public Affairs team demanding to know why USAID had awarded a \$110,000 grant to HHRD "despite longstanding, detailed allegations that HHRD is connected to designated terrorist organizations, terror financiers, and extremist groups."<sup>331</sup>
- In November 2022, Rep. Michael McCaul (R-TX) referred to HHRD's "reported association with terrorists" in a tweet sent from the House Foreign Affairs Committee Majority account.<sup>332</sup> Rep. McCaul's reference to HHRD's "reported association with terrorists" was based on the November 2019 congressional letter to the State Department, which was based on Sam Westrop's article in the Pakistani outlet *Rabwah Times*, which was in turn based on his manipulation of information in the *Frontier Post* article "Steps for the betterment of special persons urged."<sup>333</sup>
- On January 11, 2023, USAID staff briefed the House Foreign Affairs Committee (HFAC) staff on the topic of a USAID grant to HHRD. USAID informed HFAC staff that it had forwarded information provided by the Committee to USAID's Office of Inspector General.<sup>334</sup>
- On January 24, 2023, in a letter to Samantha Power, USAID Administrator, Rep. Michael McCaul (R-TX) referred to "longstanding, detailed allegations that HHRD is connected to designated terrorist organizations, terror financiers, and extremist groups."<sup>335</sup> Rep. McCaul's letter referenced the November 2019 letter sent by Reps. Fleischmann (R-TN), Banks (R-IN), and Weber (R-TX) to Ambassador Nathan Sales at the State Department, which in turn cited Westrop's article in *National Review* based on his manipulation of information in the *Frontier Post*.

In August 2023, USAID's Vetting Support Unit notified HHRD that it had completed its vetting process and had determined that "Helping Hand for Relief and Development Inc. is eligible at this time to receive a USAID award in connection with the [Ocean Freight Reimbursement project]."<sup>336</sup>

The HHRD case study presented here demonstrates that manipulated information generated by Sam Westrop in the *Rabwah Times* in January 2018, drawing on a report in the Pakistani outlet *Frontier Post* in December 2017, became the foundation for a series of congressional actions, one building upon the next. During this time, MEF and IPT also continued to manipulate information contained in the *Frontier Post*, *Rabwah Times*, and *National Review* articles in their own content, which were then carried by various US and Indian media outlets. This created a cycle of manipulated information, giving the false appearance that there was substantive evidence for a variety of false claims about HHRD's relationship with various designated groups.

This cycle of manipulated information spurred a series of congressional actions including but not limited to a House Resolution (H.R. 160), a congressional letter to the State Department's Coordinator for Counterterrorism, a congressional letter to President Biden, a congressional letter to Attorney General Merrick Garland, email exchanges between House Foreign Affairs Committee staff and USAID's Bureau for Legislative and Public Affairs team, a tweet to USAID from the Chair of the House Foreign Affairs Committee, Rep. Michael McCaul (R-TX), and a letter from Rep. McCaul to the Administrator of USAID, Samantha Power, calling for a halt of funding to HHRD. This was undoubtedly a waste of congressional time and resources.

331 The email is referenced in a January 2023 letter from Rep. Michael T. McCaul (R-TX), Chairman, House Foreign Affairs Committee, to Samantha Power, Administrator, USAID: McCaul, Michael T. "Letter to Samantha Power, Administrator, USAID," January 24, 2023. <https://scharinteragmu.wpengine.com/wp-content/uploads/2023/12/McCaul-USAID-HHRD-Grant-Letter54.pdf>.

332 House Foreign Affairs Committee Majority. Twitter Post. November 17, 2022, 3:15PM. <https://twitter.com/houseforeignngop/status/1593337077055234049?s=20&t=W6ighsx1fhvleQ6Zo0yfg>

333 For the November 2019 congressional letter, see Banks, Jim, Chuck Fleischmann, and Randy Weber. "Letter to Ambassador Nathan Sales, Coordinator for Counterterrorism, U.S. Department of State," November 1, 2019. <https://scharinteragmu.wpengine.com/wp-content/uploads/2023/12/Banks-et-al-Letter-to-Amb-Sales.pdf>; for Sam Westrop's article in the Pakistani outlet *Rabwah Times* cited in the Nov 2019 letter to tie HHRD to terrorism, see Westrop, Sam. "American Islamist Charity Openly Partners with Designated Terrorists." *Rabwah Times*, January 4, 2018. <https://www.rabwah.net/american-islamist-charity-openly-partners-designated-terrorists%E2%80%A8/>; for the original source for Westrop's reporting in the *Rabwah Times*, see *Frontier Post*. "Steps for Betterment of Special Persons Urged." December 4, 2017. <https://thefrontierpost.com/steps-betterment-special-persons-urged/>.

334 McCaul, Michael T. "Letter to Samantha Power, Administrator, USAID," January 24, 2023. <https://scharinteragmu.wpengine.com/wp-content/uploads/2023/12/McCaul-USAID-HHRD-Grant-Letter54.pdf>.

335 McCaul, "Letter to Samantha Power."

336 "Letter from USAID Vetting Support Unit to HHRD," August 16, 2023. <https://scharinteragmu.wpengine.com/wp-content/uploads/2023/12/USAID-Eligibility-Notice-HHRD.pdf>.

The HHRD case study highlights the precarious situation faced by Muslim-led humanitarian aid INGOs, and humanitarian INGOs in general, in operating in politically fragile contexts across the globe where non-state actors, including designated groups, operate openly. In the case of Muslim-led humanitarian aid INGOs, this risk exposure is magnified by the actions

of *generators*, such as the Middle East Forum and the Investigative Project on Terrorism, whose information manipulations in this case exposed HHRD to significant political and legal risks at home as well as the potential for endangering its staff in India, where numerous articles containing this manipulated information were published.

# Conclusion



Shifts in the geopolitical environment and a persistent crisis in public communications have provided a permissive environment for information manipulation campaigns. Starting in 2017, US-based anti-Muslim think tanks ramped up a campaign targeting Muslim-led humanitarian relief and development aid INGOs. This campaign was spearheaded by the Middle East Forum, the Investigative Project on Terrorism, the Center for Security Policy, the Gatestone Institute, and Americans for Peace and Tolerance. The campaign used tactics such as shotgun argumentation, circular reporting, and the cross posting of manipulated content, to flood the information environment with false and/or misleading allegations. These allegations, replete with conspiratorial and fallacious thinking, take advantage of narrow and distorted understandings of Islamic aid cultures. Their aim is to cause maximal reputational and operational damage to Muslim-led humanitarian relief and development aid INGOs in the United States.

Undoubtedly, the information manipulation campaigns that we document in this report were designed in large part to persuade politicians on Capitol Hill to take legislative action to disrupt the operations of Muslim-led charities in the United States. To this end, actors such as Husain Haqqani of the Hudson Institute, M. Zuhdi Jasser of the American Islamic Forum for Democracy, Jonathan Schanzer of the Foundation for Defense of Democracies, and Sarah Stern of the Endowment for Middle East Truth acted as *legitimizers* on Capitol Hill, validating the false and/or misleading content of these attacks by the *generators*. Lobbying on Capitol Hill by *generators* such as the Middle East Forum resulted in susceptible or sympathetic members of Congress amplifying manipulated information, with false and/or misleading allegations accumulating in the public record. Over the course of the 115<sup>th</sup> through 118<sup>th</sup> Congresses, US Representatives took a series of unjustified actions premised on manipulated information about Muslim-led humanitarian INGOs produced by this campaign. These actions wasted the time of members of Congress, their legislative staff, and executive branch personnel.

These attacks have had a range of harmful effects on Muslim-led INGOs. Campaigns that falsely accuse INGOs of links to extremism and terrorism have triggered investigations by charity regulators, government agencies, and Congress. This has forced the targeted INGOs to divert resources intended for people in need to public relations and political communications functions to refute the false and/or misleading allegations. Information manipulation campaigns can also make their way to financial institutions, contributing to financial access challenges for INGOs. This can manifest as account closures, account refusals, and delayed or canceled international wire transfers, which can have knock-on effects on life saving programs abroad.

The *generators* of manipulated information that we identify in this report operate as 501(c)3 nonprofit organizations, which makes them eligible to receive tax-free donations. Their activities, while harmful, are protected by the First Amendment.<sup>337</sup> A lack of legal regulation or cross-sector consensus on what constitutes harmful activity poses significant difficulties for the philanthropic sector. That is, because the legal frameworks designed to promote and defend democratic values are being exploited for anti-democratic purposes, funders must take it upon themselves to implement due diligence measures that can protect their institutions from the risks involved in inadvertently supporting this kind of harmful activity.

337 "False Speech and the First Amendment: Constitutional Limits on Regulating Misinformation." Washington, DC: Congressional Research Service, August 1, 2022. <https://crsreports.congress.gov/product/pdf/IF/IF12180>.

# Methodology



## Research Question / Objective

The purpose of this research is to identify the *generators*, *legitimizers*, and *disseminators* of attacks on Muslim-led humanitarian aid and development INGOs. We also address the following set of research questions:

- What individuals and groups are manipulating information about Muslims, particularly about US-based Muslim-led humanitarian relief and development aid INGOs?
- What sorts of arguments do they employ?
- How are the arguments set forth in the manipulated information inaccurate?
- Who is funding these individuals and groups?
- What are donor-advised funds (DAFs) and what is their role in funding information manipulation campaigns against Muslim-led humanitarian relief and development aid INGOs?
- How is this manipulated information disseminated?
- How does it make its way to policymakers? Financial institutions?
- What stakeholders are amplifying this manipulated information?
- What stakeholders are making decisions based on this manipulated information and how does that impact Muslim INGOs?

## Definition of Terms

- We define a *generator* as an organization or individual that is responsible for producing original content that uses manipulated information to attack a Muslim-led humanitarian INGO.
- We define a *legitimater* as an organization or unelected individual that is responsible for introducing the content produced by a *generator* or *generators* into political settings. This includes providing congressional testimony or organizing a campaign calling for executive agencies or legislators to launch investigations or other actions designed to influence political processes and/or policy making based on manipulated information.
- We define a *disseminator* as media sources or other civil society organizations that amplify the content of the *generators* in online spaces.
- We define an *attack* as the use of information manipulation to target a Muslim-led humanitarian INGO. Single articles produced by *generators* may involve multiple attacks on multiple Muslim-led INGOs.

- We define “information manipulation” as the generation, dissemination, and legitimation of false and/or misleading narratives that are then weaponized to exploit sociopsychological, infrastructural, and physical vulnerabilities in the information environment to influence public opinion and/or to incline powerholders to voluntarily make predetermined decisions desired by the initiator.
- We define a “Muslim-led humanitarian and development aid INGO” as one that fulfills all the following conditions:
  - It has explicitly acknowledged and foregrounded an Islamic identity in its public facing materials at any point between January 2016 and end of July 2023.
  - It is primarily engaged in the delivery of humanitarian relief and/or development aid.
  - It is based in the United States or operates as the US branch or affiliate of an INGO headquartered in another country.
  - It has an international operational focus.

## Research Scope and Limitations

The scope of this report is limited to the output of US-based non-state *generators* of manipulated information. Limiting the focus to non-state actors in the US is a practical choice because the research questions primarily concern the impacts on US non-state actors (US-based Muslim-led humanitarian relief and development aid INGOs). Limiting the scope to US-based non-state actors allows for a more in-depth exploration of the cases we present here without the added complexity of including non-state actors from multiple countries. This research also requires an analysis of unique characteristics of the US political system and the inclusion of other non-state actors, or introducing supranational actors such as the European Union, would add considerable complexity.

This research is also limited by the availability of data. For example, we do not examine the spread of manipulated information about Muslim-led humanitarian relief and development aid INGOs across the mailing lists of *generators* as we lack historical access to that data. Neither do we have access to encrypted messaging apps, such as WhatsApp, Telegram, and Signal that, according to a recent Brookings report, “have become a promising new



avenue for the spread of disinformation, particularly among diaspora communities.”<sup>338</sup> We also have limited access to organizational activities that are key elements of the object of research, such as lobbying or government relations functions on Capitol Hill. While formal records exist, such as lobbying registrations and FARA records, these provide very limited information.

## Data Sources

The primary data sources for this project include the Congressional Record, IRS 990 and 990-PF forms, Foreign Agent Registration Act (FARA) filings, federal and state court cases, and diplomatic cables released due to Freedom of Information Act requests. We also mined exchanges of correspondence between Congress, the executive branch, advocacy organizations, attorneys, and humanitarian INGOs.

Secondary data sources include the relevant literatures on a diverse set of topics such as diasporic politics, information manipulation, the humanitarian sector, Islamic aid cultures, Islamophobia, the philanthropic sector, politics and religion in the Middle Eastern and South Asian politics, transnational religious movements, and US political lobbies and lobbying. We also used open-source data such as online newspaper reports, think tank reports as well as proprietary databases such as LegiStorm for identifying congressional staff, NexisUni for historical searches of news media, and Foundation Directory Online for researching nonprofits.

## Data Collection and Analysis

We used open-source searches to compile a master list of US-based Muslim-led, faith-based, or faith-inspired, humanitarian INGOs. This included mining existing lists such as those published by American Muslim communal organizations. We sorted the results as measured by income reported in IRS 990 returns in 2021 (or the latest year available) and eliminated any smaller organizations (less than \$1 million revenue). Eliminating organizations that are not likely to be attacked in the first place makes the sample more streamlined and manageable. Our subsequent analysis confirmed that the *generators* focus their attacks on

substantially larger organizations. Throughout the project, we retrieved the relevant IRS 990s from a combination of searches on Guidestar, Propublica, Nonprofit Explorer, and the Foundation Directory Online.

We excluded organizations that did not meet our criteria in defining a “US-based Muslim-led humanitarian INGO.” Our five definitional criteria result in the exclusion from our sample of organizations such as American Near East Refugee Aid and American Relief Agency for the Horn of Africa, neither of which foreground an Islamic identity in the specified time frame and ICNA Relief, which fulfills other criteria but whose operational focus is primarily domestic.

We eliminated an organization if it gave no explicit indication of an identification with Islam in its “About us,” “Mission,” or executive leadership pages or elsewhere visibly on its home page (including in dropdown menus). Two organizations, Pure Hands and Penny Appeal USA, did not foreground or explicitly acknowledge an Islamic identity on their websites but featured “give your zakat” links. Ultimately, it was not necessary to make a determination about either of these organizations as we found no evidence that either has been the target of reputational attacks from US-based non-state actors.<sup>339</sup>

To determine whether an organization was the subject of a reputational attack, we reviewed the top 50 results using the search string: “[organization name]” AND (“terrorism” OR “terror” OR “terrorist” OR “designated”). We limited the time frame to the ten-year period September 1, 2013, to August 31, 2023. Each search was conducted after clearing the browser history and using Google Chrome’s incognito mode to avoid previous search history biasing the results and to provide for better consistency and replicability. We recognize that Google occasionally modifies its algorithm and that this could affect replicability. However, we think the effects would likely be minimal, given the set time frame, and could be counteracted by analyzing an expanded number of search results.

We eliminated any organizations when we could not determine that they had been the target of more

338 Gursky, Jacob, Martin J. Riedel, and Samuel Woolley. “The Disinformation Threat to Diaspora Communities in Encrypted Chat Apps.” Brookings, March 19, 2021. <https://www.brookings.edu/articles/the-disinformation-threat-to-diaspora-communities-in-encrypted-chat-apps/>.

339 In our analysis, at the time of writing, Penny Appeal USA has only been attacked by the Indian-based information manipulator “DisinfoLab.” See <https://web.archive.org/web/20230317134439/https://thedisinfolab.org/covid-aid-scam-2021-iii-the-charity-theatre/>.

than one reputational attack. This process led to the elimination of Mercy-USA for Aid and Development, Rahma Relief, and Mercy Without Limits, each of which was the target of a single reputational attack in the given time frame; and the Aga Khan Foundation, for which we could not find any attacks in the specified time frame.

This process produced a list of nine Muslim-led humanitarian INGOs, listed here in descending order of size indicated by reported revenue in 2021 IRS 990 forms:

- Islamic Relief USA (the US affiliate of the UK-based INGO Islamic Relief Worldwide)
- Helping Hand for Relief and Development (HHRD)
- Baitulmaal
- LIFE for Relief and Development
- United Mission for Relief and Development (formerly United Muslim Relief)
- Syria Relief and Development
- Zakat Foundation of America
- Muslim Aid USA (the US affiliate of the UK-based INGO Muslim Aid)
- United Hands Relief

We downloaded and reviewed the top 30 results for each search string for each of the nine Muslim-led humanitarian INGOs. We qualitatively coded the results to identify *generators*, *legitimizers*, and *disseminators*. These data also provided some initial information on other relevant actors, such as legislators, who repeated or acted on manipulated information.

We eliminated original creators of reputational attacks on Muslim-led humanitarian INGOs that are not US-based such as The Henry Jackson Society (UK), NGO Monitor (Israel), DisinfoLab (India), and Nordic Monitor (Sweden).

However, we included international media coverage of reputational attacks in the HHRD case study, once it became clear that the *generators* were purposefully promoting their content in Indian language media where it was contributing to a self-reinforcing cycle of manipulated information. Here, we used the search string: (“HHRD” OR “Helping Hand” OR “Helping Hands”) AND (“Falah Insania” OR “Falah-e-Insaniat” OR “Falah-i-Insaniyat” OR “Falah-i-Insaniat” OR “Falah-e-Insaniyat” OR “Lashkar” OR “Lashkar-e-Taiba” OR “Lashkar-i-Taiba” OR “Hizb-UI-Mujahideen” OR “Hizbul Mujahideen”). We performed both web and news searches using Google search functions. We limited the time frame

to the period between January 2017 and August 2023 to coincide with the start of the 115<sup>th</sup> congressional session through the time of writing. Limiting the time frame enhances replicability. As before, each search was conducted after clearing the browser history and using Google Chrome’s incognito mode to avoid previous search history biasing the results and to provide for better consistency.

We only included results when we were able to determine that the result in question is sourcing US-based *generators* (or were using sources that were based on US-based *generators*). This allows us to gauge the international reach of the US-based *generators* of reputational attacks and identify any noteworthy patterns in the media outlets that carried the attacks. In cases where the source for manipulated information was not clear, we assumed the participation of an already identified *generator* if an US-based author or organization was mentioned in the article or in the footnotes/endnotes. For news articles that were behind paywalls, we located the relevant content through searches on NexisUni.

We do not characterize producers of content that, in our view, overstate the links between humanitarian organizations and Islamist movements, such as the Muslim Brotherhood and *Jama’at-i-Islami*, as *generators* of manipulated information if this is their sole content produced. For example, the website GlobalMBWatch is singularly interested in “mapping” an international Muslim Brotherhood network. In doing so, in our view, it asserts links that are improbable and/or overstates the importance of links that, in our view, are at best weak and informal. We assume a good faith disagreement about the kind and degree of such links.

When articles by *generators* are carried as op-eds, we do not categorize the media in question as *disseminators*, given the wide latitude that is afforded to opinion columns. We also do not characterize media that reported on the antisemitic misconduct of the two IRW trustees and the senior executive as *disseminators* as this was a legitimate news story, albeit one that was the output of a state-led smear campaign by the UAE.

This process resulted in the identification of two *generators*: The Middle East Forum and the Investigative Project on Terrorism. The Center for Security Policy was subsequently added as a *generator* when it was determined that it had produced manipulated information about US-based Muslim-

led INGOs that was cited in a report by the UK-based think tank the Henry Jackson Society that appeared in the original search results. A review of the content produced by these three *generators* revealed the relationship between Sam Westrop of the Middle East Forum, and two previously unidentified organizations, the Gatestone Institute and Americans for Peace and Tolerance (APT).<sup>340</sup> Our analysis of the respective outputs of these organizations led us to add them to our list of *generators*.

We performed searches for each of the nine Muslim-led humanitarian INGOs on the websites of the five *generators* and created a corpus of content involving attacks on the INGOs. We analyzed a sample (n=48) of this corpus (N=190) to identify rhetorical techniques, fallacies, and other forms of manipulation, used by the *generators*. We used this analysis to create the initial version of the framework in Section 3. We tested this framework on three randomly sampled articles not used to previously formulate the framework.

To gauge the political impact of manipulated information that may have come from lobbying and policy activities, we traced the sources cited, quoted, or paraphrased in congressional documents, letters, and hearings that targeted any of the nine Muslim-led humanitarian INGOs between January 2017 and August 2023. This covers the start of the 115<sup>th</sup> congressional session through the time of writing. In some instances, congressional documents directly cite sources. In other instances, we can trace the influence of the content produced through the timing and specific content of the allegation(s) and the language used. This process tracing exercise identifies the core network involved in producing the manipulated content that spurred significant congressional activity from January 2017 through August 2023.

In the case of a letter to Nancy Pelosi (D-CA) and Elliot Engel (D-NY) that demanded the removal of Rep. Ilhan Omar (D-MN) from the House Foreign Affairs Committee, we categorized the organizer of the letter, Sarah Stern of the Endowment for Middle East Truth (EMET) as a *legitimator*.<sup>341</sup> We categorized

EMET as a *legitimator* based on our analysis of the content of the letter to Reps. Pelosi and Engel, which simply regurgitated content created by *generators* and contained no original manipulated content. We did not add the signatories to the letter because our definition of a *legitimator* requires an “organizing” role, which we could not establish for any of the other signatories to the letter.

The identification of two outsized *generators*, the Middle East Forum and the Investigative Project on Terrorism justifies their choice as case studies in Section 2. The fact that the bulk of information manipulation attacks and political activities targeted Islamic Relief and Helping Hand for Relief and Development, which are also the two largest Muslim-led humanitarian relief and development aid INGOs, justified selecting them as INGO case studies in Section 6.

We performed extensive searches of FARA filings with a focus on the legislative staff of members of Congress on the House Foreign Affairs Committee (HFAC) and lobby groups representing relevant state actors. We used the Legistorm database to identify the legislative directors and aides of members sitting on HFAC during the 115<sup>th</sup> through the current 118<sup>th</sup> congressional sessions. We then input the staff names into the OpenSecrets FARA filing search to determine which lobbyists were engaging them during the period—and for which states the lobbyists were acting as agents.

However, this process only showed correlative evidence of the influence of lobbyists for foreign governments in prompting legislative action in this issue area. For example, we noted an extensive history of prior emails to—and phone calls with—Rep. Scott Perry’s legislative director by lobbyists for the Indian embassy in January, February, and March 2022 including an email sent on March 9, 2022, “to discuss letter on Islamist groups.”<sup>342</sup> This email was sent on the same day that Rep. Perry, along with Gregory Steube (R-FL) and Mary Miller (R-IL), sent a letter to Attorney General Merrick Garland requesting that the Department of Justice investigate allegations of links between Pakistan’s Ambassador designate to

340 Early in the corpus of MEF attacks on Muslim-led humanitarian INGOs, Westrop co-authored an article with APT founder, Charles Jacobs. See Jacobs, Charles, and Sam Westrop. “The Muslim Brotherhood Isn’t the Only Gang in Town.” *Islamist Watch*, October 4, 2016. <https://web.archive.org/web/20200810163024/https://www.meforum.org/islamist-watch/50689/the-muslim-brotherhood-isnt-the-only-gang-in-town>.

341 Stern, Sarah, Brigitte Gabrielle, Andrew S. Borans, Helen Freedman, Judy Freedman Kadish, Charles Jacobs, Fred Fleitz, et al. “Letter to Speaker Nancy Pelosi and Chairman Eliot Engel.” March 4, 2019. <https://scharinteragmu.wpenline.com/wp-content/uploads/2023/12/EMET-letter-to-Pelosi-Engel-re-Ilhan-Omar.pdf>.

342 For the FARA filing noting the history of communications between lobbyists for the Indian Embassy and Chris Fernandez, legislative director for Rep. Scott Perry, in early 2022, see <https://efile.fara.gov/docs/5430-Supplemental-Statement-20220629-49.pdf>.

the US, Masood Khan, and various Islamist groups.<sup>343</sup> While these events correlate, we cannot establish that lobbyists working on behalf of the Indian embassy caused the representatives to send the letter to Attorney General Garland.

In summary, the methodology chosen for this study, which combines qualitative case studies and content analysis, aligns with the research objectives outlined above. While this methodology offers valuable insights, we acknowledge its limitations, such as the limits in geographic scope, data limitations, potential biases inherent in online searches, and the potential of future changes in search engine algorithms to create replicability issues.

### Funding network methodology

Empirical data on the funders of the five *generators* of manipulated information was first gathered through the Foundation Directory Online (FDO). The FDO data purports to show both the sources of income for an organization as well as its financial contributions. We cross-checked each of the five *generators* in the Foundation Directory Online and examined their funders, as well as the specific amounts each funder had contributed in 2016, 2017, 2018, 2019, 2020, and 2021. We tested for possible duplicates by checking IRS 990-PFs for the applicable foundations to reconcile the numbers. A list of the top 30 funders of the five *generators* was compiled from this data.

It is important to note that FDO data are incomplete and sometimes unreliable. This is because the data scraping tools used by FDO do not pick up misspellings (e.g., “Middel East Forum” for Middle East Forum) or abbreviated names (e.g., “IPT Foundation” or “IPTF” for the Investigative Project on Terrorism). To correct for this, we undertook a comprehensive examination of publicly accessible tax filings (IRS 990-PF forms) of the top 30 funders as identified by the FDO data for each of the 6 years in question. The IRS 990-PF returns are more detailed and reliable than the Foundation Directory Online data. However, IRS 990-PF returns only become available online approximately two years after they are originally filed. Consequently, in 2023, the most recent available forms pertained to the year 2021. It’s important to note that IRS Form 990

exclusively provides information about the recipients of an organization’s financial contributions and does not disclose the sources of income for the organization itself. Moreover, there is very occasionally some difficulty in accessing the schedules to IRS 990s where the recipients and amounts of funders’ contributions are listed. For this reason, we set a threshold of \$150,000 or greater in Table 4, as we had incomplete data for one funder who fell just below this threshold.

In instances where inconsistencies arose between entries in the Foundation Directory Online and the data found in the IRS 990-PF forms, we prioritized the latter as the primary source material. Moreover, where funders employed irregular fiscal years (e.g., July 1 to June 30), we prioritized the year of the 990-PF returns. For example, we categorized an organization’s contributions made in tax year beginning July 1, 2017, and ending June 30, 2018, as contributions made in 2017 (the year indicated on Form 990-PF).

Through this methodological approach, we identified 269 organizations that contributed more than \$30 million in funding to the *generators* of manipulated information between 2016 and 2021. As noted in Section 5, while a summary review of the data may suggest a direct causal relationship and link between charitable funding and information manipulation, there is a range of contextual factors that should be taken into consideration before arriving at such conclusions. Despite the transparency of correlating data, linking funding to grantee behavior, the motivations, awareness, and processes surrounding charitable giving remain multifaceted and often opaque.

343 For the letter sent by Reps. Perry, Steube, and Miller, see Perry, Scott, W. Gregory Steube, and Mary E. Miller. “Letter to Merrick Garland, Attorney General of the United States,” March 9, 2022. <https://scharinteragmu.wpengine.com/wp-content/uploads/2023/12/Perry-letter-to-AG-Garland-re-Masood-Khan.pdf>.

