

CAUSE NO. _____

THE STATE OF TEXAS

IN THE DISTRICT COURT

Plaintiff,
v.

COLLIN COUNTY, TEXAS

MUSLIM BROTHERHOOD, *et al.*,

Defendants.

_____ JUDICIAL DISTRICT

**STATE OF TEXAS'S ORIGINAL PETITION AND APPLICATION
FOR TEMPORARY AND PERMANENT INJUNCTIONS**

The Muslim Brotherhood is a radical terrorist organization that exists to usurp governmental power and establish dominion through Sharia law. For three decades, it has covertly operated in the United States under the name “CAIR”—the Council on American-Islamic Relations—as its American affiliate. The group is not peaceful. It is not tolerant. It does not respect the freedom to practice other religions or sects, including Christianity and Judaism. Instead, as the United Kingdom’s official government review found, the Muslim Brotherhood “accept[s] the political utility of violence” and has systematically engaged in political assassinations and terrorist attacks to accomplish its goal of a global Islamic caliphate.¹

CAIR’s origin story reveals its true nature. The organization was created at a secret October 1993 conference in a Philadelphia hotel room, where Hamas operatives—under FBI surveillance—strategized about how to support Hamas’s mission while evading law enforcement detection. The wiretapped transcripts captured attendees, including CAIR’s future co-founders Nihad Awad and Omar Ahmad, discussing the need for “deception,” “camouflage,” and

¹ United Kingdom House of Commons, HC-679, Muslim Brotherhood Review: Main Findings (2015) at 3, <https://tinyurl.com/5a4wvsxv>.

maintaining a “front” organization. One year later, these same individuals founded CAIR. In a 1994 public statement, Awad declared: “I am in support of the Hamas movement.”

The connection between CAIR and terrorist financing wasn’t theoretical—it was criminal. Ghassan Elashi, CAIR-Texas’s founding board member, was convicted in 2008 of funneling \$12.4 million to Hamas through the Holy Land Foundation, in the largest terrorism financing prosecution in American history. He now serves a 65-year federal prison sentence. In that trial, federal prosecutors named CAIR as an unindicted co-conspirator. The federal court found there was “ample evidence to establish the associations of CAIR” with Hamas. An FBI Assistant Director testified to Congress that the FBI had suspended all formal contacts with CAIR because evidence “demonstrated a relationship among CAIR, individual CAIR founders, and the Palestine Committee”—the Muslim Brotherhood’s U.S.-based Hamas support apparatus. As FBI Agent Lara Burns testified at trial: CAIR was created as “a front group for Hamas.”

Despite this record, CAIR continues to operate in Texas under the same organizational structure established by these convicted terrorists. The Texas chapter that Elashi founded still operates today in Dallas-Fort Worth and Austin. And the threat isn’t historical. Hamas—the Muslim Brotherhood’s Palestinian branch—carried out the October 7, 2023, terrorist attacks that murdered over 1,200 people, including at least 46 Americans. In the attack’s aftermath, a participant in the October 7, 2023, assault was arrested in Louisiana. In Boulder, Colorado, a Muslim Brotherhood sympathizer firebombed a Jewish protest. And across American college campuses, CAIR has supported violent protests, creating a “Champions of Justice” scholarship program that rewards students arrested for criminal activity—mirroring Hamas’s “pay for slay” program that compensates terrorist families.

Nine countries have already acted. Since December 2013, the Muslim Brotherhood has been designated as a terrorist organization and prohibited from operating in Egypt, Saudi Arabia, the United Arab Emirates, Bahrain, and five other nations. In 2025, Texas and the United States followed suit. On November 18, 2025, Governor Greg Abbott formally designated the Muslim Brotherhood and CAIR as Foreign Terrorist Organizations under Texas Penal Code section 71.01(e). Six days later, President Donald Trump signed an executive order initiating the designation of Muslim Brotherhood chapters in Egypt, Jordan, and Lebanon as Foreign Terrorist Organizations under federal law.

Yet, despite this designation, the Muslim Brotherhood remains active in Texas through CAIR. The organization is quietly building an underground network across the State with a singular objective: establish Sharia law, punish infidels, and overtake Texan institutions of power.

This cannot be permitted. The Muslim Brotherhood and CAIR are prohibited from operating in Texas based on the violent and systemic unlawfulness of their activities—just like the Sinaloa Cartel and Tren de Aragua. Through this lawsuit, the State of Texas seeks immediate injunctive relief prohibiting the Muslim Brotherhood and CAIR from engaging in any further activity within the State.

The evidence that follows demonstrates that CAIR is not what it claims to be. It is, and has always been, the American face of an international terrorist organization. The question is simple: Should an organization created by Hamas operatives at a secret 1993 meeting, led by a convicted terrorism financier serving 65 years in federal prison, named as a co-conspirator in the largest terrorism financing case in U.S. history, and deemed too dangerous for the FBI to engage with, be allowed to continue operating anywhere in America?

The time has come to answer that question definitively.

I. THE PARTIES

1. Defendant, the Muslim Brotherhood (“Muslim Brotherhood”), is an unincorporated organization that is a transient transnational organization and/or an organization whose residence is unknown to the State, and, accordingly, it may be served by publication.

2. Defendant, CAIR-Foundation, Inc. d/b/a “Council on American-Islamic Relations,” which conducts business throughout the United States, including in Collin County, the American Chapter of the Muslim Brotherhood, is a Washington, D.C. nonprofit corporation that can be served through its registered agent, Nihad Awad, located at 453 New Jersey Ave SE, Washington, DC, 20003.

3. Defendant, CAIR-Texas Inc., the Texas Chapter of the Muslim Brotherhood, is an incorporated Texas nonprofit corporation that can be served through its registered agent, Tarek M. Hussein, located at 3611 Acorn Wood Way, Houston, Texas 77059.

4. Defendant, Council on American Islamic Relations-Texas, Dallas Forth Worth, the DFW Chapter of the Muslim Brotherhood, is an incorporated Texas nonprofit corporation that can be served through its registered agent Bilal Khaleeq, located at 811 S. Central Expwy, #307, Richardson, Texas 75080.

5. Defendant, Council on American Islamic-Relations, Austin, Texas d/b/a CAIR-Austin, the Austin Chapter of the Muslim Brotherhood, is an incorporated Texas nonprofit corporation that can be served through its registered agent, John T. Floyd Law Firm, located at 3730 Kirby Dr, Suite 750, Houston, Texas 77098.

II. DISCOVERY CONTROL PLAN

6. Discovery is intended to be conducted under Level 2 of Rule 190 of the Texas Rules of Civil Procedure.

III. JURISDICTION AND VENUE

7. Venue is proper in Collin County, Texas, because a substantial part of the events or omissions giving rise to Texas's claims occurred in Collin County.²

8. Jurisdiction is proper because the Muslim Brotherhood has established minimum contacts in Texas such that the maintenance of this suit does not offend traditional notions of fair play and substantial justice, *see Int'l Shoe Co. v. State of Wash., Off. of Unemployment Comp. & Placement*, 326 U.S. 310, 316 (1945), and because the Muslim Brotherhood transacts business in Texas and is therefore subject to Texas's long-arm statute, *see Tex. Civ. Prac. & Rem. Code §§ 17.001-093*.

9. The Court has general jurisdiction over the Muslim Brotherhood because its contacts and affiliations with Texas are so continuous and systematic as to render it essentially at home in Texas.³

10. Alternatively, the Court has specific jurisdiction over the Muslim Brotherhood because it purposefully availed itself of the privileges of conducting activities in Texas and the causes of action in this suit arise out of or relate to the Muslim Brotherhood's contacts in Texas, including advertising, fundraising, hosting events, and terrorism.⁴

² Tex. Civ. Prac. & Rem. Code § 15.002(a)(1).

³ *State v. Volkswagen Aktiengesellschaft*, 669 S.W.3d 399, 412 (Tex. 2023) (quoting *Luciano v. SprayFoamPolymers.com, LLC*, 625 S.W.3d 1, 8 (Tex. 2021)).

⁴ See generally *Luciano v. SprayFoamPolymers.com, LLC*, 625 S.W.3d 1, 9 (Tex. 2021).

11. The Court also has jurisdiction over the Muslim Brotherhood because it consented to personal jurisdiction by registering and transacting business in Texas.⁵

IV. FACTS

The Transnational Muslim Brotherhood

12. The Muslim Brotherhood was founded in Egypt in 1928.

13. The stated objective of the Muslim Brotherhood is the establishment of a global Islamic state governed by Sharia law under the leadership of a Caliph.

14. The Muslim Brotherhood adheres to a radical interpretation of *takfirism* that labels Muslims who do not share their ideology as apostates deserving of death.⁶

15. The Muslim Brotherhood’s methodology for obtaining power encompasses what it describes as “fighting of the unbelievers” and includes “all possible efforts that are necessary to dismantle the power of the enemies of Islam including beating them, plundering their wealth, destroying their places of worship and smashing their idols.”⁷

16. Over the subsequent century, the Muslim Brotherhood evolved from a regional Egyptian organization into a transnational network operating across multiple continents.

17. As the Muslim Brotherhood grew, so did its violence.

18. The Muslim Brotherhood was responsible for political assassinations and pogroms from the 1930s through the 1960s.⁸

⁵ See *Mallory v. Norfolk S. Ry. Co.*, 600 U.S. 122 (2023); see also *Acacia Pipeline Corp. v. Champlin Expl., Inc.*, 769 S.W.2d 719, 720 (Tex. App.—Houston [1st Dist.] 1989, no writ) (“In return for the privilege of doing business in Texas, and enjoying the same rights and privileges as a domestic corporation, Champlin has consented to amenability to jurisdiction for purposes of all lawsuits within the state.”).

⁶ See David Aaron, *In their Own Words*, 6 (RAND 2008).

⁷ *Id.* at 46 (citing Hasan al-Banna, *The Way of Jihad* (1928)).

⁸ Samer Shehata, *The Muslim Brotherhood*, Wilson Center (Aug. 27, 2015), <https://tinyurl.com/ycxvp489>, (documenting “special apparatus” assassinations in 1940s including 1947 judge assassination and 1948 Prime Minister assassination).

19. Beginning in the 1960s, the Muslim Brotherhood expanded its operations internationally while simultaneously pursuing a dual strategy of participating as a political party in democratic electoral processes and maintaining clandestine operational cells.

20. The Muslim Brotherhood obtained power in Egypt from 2011 until 2013, a period marked by the group's authoritarianism, violent suppression of religious minorities, and restrictions on journalists and women.⁹

21. The Egyptian military, with widespread popular support, deposed the Muslim Brotherhood from power in Egypt in 2013.

22. Following its removal from power in Egypt in 2013, the Muslim Brotherhood engaged in widespread retaliatory violence, including riots, murders, bombings of Christian churches, sectarian killings of Shiite Muslims, and numerous terrorist attacks and political assassinations.¹⁰

23. The Muslim Brotherhood currently maintains affiliates, branches, and associated organizations in more than seventy countries worldwide.

24. The Muslim Brotherhood's ideology has influenced and inspired numerous individuals who subsequently engaged in terrorist activities, including Osama bin Laden, co-founder of al-Qaeda, and Abu Bakr al-Baghdadi of ISIS.¹¹

25. Ayman al-Zawahiri, who was radicalized through his membership in the Muslim Brotherhood, subsequently orchestrated multiple terrorist attacks, including the September 11,

⁹ Ashraf El-Sherif, *The Muslim Brotherhood and the Future of Political Islam in Egypt*, Carnegie Endowment (Oct. 21, 2014), <https://tinyurl.com/5fxbyfde>.

¹⁰ See, e.g., AFP, *Egypt Sentences Morsi Supporters to Death*, Al Jazeera (Mar. 29, 2014) (Muslim Brotherhood supporters sentenced to death for throwing teenagers off a roof on video), <https://tinyurl.com/4uvrsxx3>; Jason Brownlee, *Violence Against Copts in Egypt*, Carnegie Endowment (Nov. 14, 2013), <https://tinyurl.com/ad7pm278>.

¹¹ See generally, Lawrence Wright, *The Looming Tower - al-Qaeda and the Road to 9/11*, 78 (Alfred A. Knopf 2006).

2001 attacks, the 1998 United States Embassy bombings in Kenya and Tanzania, the 2000 USS Cole attack, and the 2015 Paris attacks.¹²

26. The Muslim Brotherhood has a documented history of engaging in political violence and assassinations in furtherance of acquiring the political power necessary to achieve its stated objectives.

27. The Muslim Brotherhood employs tactically flexible strategies, alternating between democratic political participation and violent action based on strategic calculations regarding opportunities to acquire power or destabilize existing governments.

28. The Muslim Brotherhood operates through secretive and decentralized cells, affiliates, and chapters due to its seditious objective of overthrowing the governments of countries in which it operates.

29. The Muslim Brotherhood had firmly established a presence in the United States by the 1990s, with affiliated organizations operating in multiple states, including Texas.

30. The Muslim Brotherhood's U.S.-based entities publicly present themselves as charitable, educational, or religious organizations.

31. The Muslim Brotherhood continues to operate as a clandestine paramilitary organization, having returned to its historical roots by reorganizing into a secretive cell-based structure.¹³

¹² *The Muslim Brotherhood's Ties to ISIS and Al-Qaeda*, Counter Extremism Project (May 2019), <https://tinyurl.com/34ze5hwf>; Robert Windrem, *Terror on a Shoestring: Paris Attacks Likely Cost \$10,000 or Less*, NBC (Nov. 18, 2015), <https://tinyurl.com/58a2kbpj>.

¹³ See generally, Cynthia Farahat, *The Secret Apparatus: The Muslim Brotherhood's Industry of Death* (Bombardier Books 2022), <https://tinyurl.com/msd5n48f>.

32. This underground network's violence and threats to Americans continues to the present day.

33. Hamas is the Palestine Branch of the Muslim Brotherhood.

34. On October 7, 2023, and in the ensuing aftermath, a branch of the Muslim Brotherhood carried out terrorist attacks that killed over a thousand Israeli civilians.¹⁴

35. On the same day, a senior leader of the Egyptian Muslim Brotherhood called for violent attacks against U.S. partners and interests.¹⁵

36. Mahmoud Amin Ya'qub Al-Muhtadi, an operative in the Palestine Committee of the Muslim Brotherhood involved in planning and carrying out the October 7, 2023, attacks, was recently arrested in Louisiana.¹⁶

37. On June 1, 2025, Mohamed Sabry Soliman, a Muslim Brotherhood supporter firebombed a group of peaceful Jewish protestors in Boulder, Colorado.¹⁷

38. This underscores the warning delivered by FBI Director Mueller during his 2011 testimony before Congress, when he stated: "I can say at the outset that elements of the Muslim Brotherhood both here and overseas have supported terrorism."¹⁸

39. Despite the Muslim Brotherhood's documented history of violence, terrorism, and seditious objectives, these affiliated organizations continue to operate in Texas and throughout the

¹⁴ *Gaza Man Arrested for Alleged Involvement In October 7, 2023, Terrorist Attacks*, United States Department of Justice (Oct. 17, 2025), <https://tinyurl.com/4sjrny48>.

¹⁵ *Designation of Certain Muslim Brotherhood Chapters as Foreign Terrorist Organizations and Specially Designated Global Terrorists*, The White House (2025), <https://tinyurl.com/2pk4x6vd>.

¹⁶ Katie Weis, *Accused Hamas Conspirator Pleads Not Guilty in Louisiana to Allegedly Helping with Oct. 7 Terror Attack on Israel*, CBS News (Oct. 23, 2025), <https://tinyurl.com/584vua8u>.

¹⁷ Curt Devine, *et al.*, *What we Know About Colorado Suspect's Life Leading Up to Antisemitic Attack*, CNN (June 2, 2025), <https://tinyurl.com/bdf4su5w>.

¹⁸ Hearing Before the House Committee on Oversight and Government Reform, Subcommittee on National Security, 115th Cong. 1-4 (July 11, 2018) (Statement of Dr. Zuhdi Jasser), <https://tinyurl.com/3s9jcy6d>.

United States, maintaining organizational, financial, and ideological ties to the transnational Muslim Brotherhood network while publicly obscuring their commitment to the establishment of a global Islamic state and the overthrow of democratic governance.

The American Chapter of the Muslim Brotherhood

The 1993 Philadelphia Conference

40. In October 1993, senior Muslim Brotherhood operatives and leaders convened at the Marriott Courtyard Hotel in Philadelphia, Pennsylvania, for a three-day meeting to discuss strategies to support the Palestine Committee of the Muslim Brotherhood in the United States.¹⁹

41. The FBI obtained wiretap warrants on several individuals who organized the 1993 Philadelphia meeting and monitored the meeting itself. The FBI concluded that the approximately two dozen men present were Hamas members or supporters.²⁰

42. In attendance at the Philadelphia Conference were Nihad Awad and Omar Ahmad, who would co-found CAIR the following year.²¹ Also attending was the Dallas-based treasurer, Ghassan Elashi (discussed at length *infra*).²²

43. According to transcripts of the Philadelphia Conference introduced as evidence in the *United States v. Holy Land Foundation* trial, the meeting opened with instructions regarding security, as participants were urged to refer to Hamas as “Samah”—its name spelled backwards—or simply as “the movement” throughout the meeting and in phone conversations.²³

¹⁹ Danielle Pletka, *Can CAIR Be Shut Down?*, Jan. 17, 2026, American Enterprise Institute, <https://tinyurl.com/mpev8zkd>; Lorenzo Vidino, *The Hamas Networks in America: A Short History*, George Washington University Program on Extremism (Oct. 2023), at 10, <https://tinyurl.com/45z6nk2a>; *see also* CAIR Executive Director Placed at HAMAS Meeting, Investigative Project on Terrorism (Aug. 7, 2007), <https://tinyurl.com/mtkkj4fw>.

²⁰ *See generally, id.*

²¹ *Id.*

²² Vidino, *supra* note 19, at 9.

²³ *Id.*

44. Conference participants discussed the need for deception in their operations. According to wiretap transcripts, one participant stated: “I swear by Allah that war is deception,” and urged: “[D]eceive, camouflage, pretend that you’re leaving while you’re walking that way. Deceive your enemy.”²⁴

45. While one attendee of the Philadelphia Conference stated, “[W]ar is deception,” Omar Ahmad, who would become CAIR’s co-founder and first chairman, agreed and further noted in no uncertain terms that: “politics is a completion of war.”²⁵

46. According to wiretap transcripts, conference participants stated that they would create an organization that would “remain a front so that if the thing [the U.S. government ban on Hamas] happens, [they] will benefit from the new happenings instead of having all of [their] organizations classified and exposed.”²⁶

47. Holy Land Foundation President Shukri Abu Baker stated at the Philadelphia Conference: “Let’s not hoist a large Islamic flag, and let’s not be barbaric-talking. We will remain a front so that if the thing happens, we will benefit from the new happenings instead of having all of our organizations classified and exposed.”²⁷

48. Conference attendees discussed creating an organization that would: (1) act as a fundraising arm for Hamas; (2) infiltrate American media outlets, universities, and research centers; (3) work with other sympathetic Muslim associations; and (4) act as an entry point into United States politics while concealing its true agenda.²⁸

²⁴ *Id.* at 12 (quoting Philadelphia Conference wiretap transcripts introduced at *United States v. Holy Land Foundation* trial).

²⁵ See The Muslim Brotherhood’s U.S. Network, Hudson Institute, (Feb. 27, 2008), <https://tinyurl.com/2kb79xkr> (quoting a transcript of October 1993 meeting of U.S. Palestine Committee leaders in Philadelphia).

²⁶ Vidino, *supra* note 19, at 13 (quoting Philadelphia Conference wiretap transcripts).

²⁷ *Id.*

²⁸ Pletka, *supra* note 19.

49. In furtherance of those goals, the next year Omar Ahmad and Nihad Awad, both of whom had attended the 1993 Philadelphia Conference, created CAIR.²⁹

50. Prior to founding CAIR, both Nihad Awad and Omar Ahmad were officials of the Islamic Association for Palestine (IAP), another organization that served as a front in the United States for the Muslim Brotherhood.³⁰

51. In 2004, a federal magistrate determined that IAP was liable for damages in the 1996 murder of an American teenager by a Hamas gunman, finding “an abundance of evidence” that “IAP . . . desired to help Hamas’ activities succeed, and . . . engaged in some act of helping those activities succeed.”³¹

52. In a 1994 forum discussion videotaped at Barry University, CAIR’s Executive Director Nihad Awad stated: “I’m in support of the Hamas movement . . .”³²

The Holy Land Foundation Trial and Government Findings on CAIR

53. The Holy Land Foundation for Relief and Development (HLF) was a Richardson, Texas, based charitable organization that operated as the chief fundraising arm of the Muslim Brotherhood’s Palestine Committee in the United States.³³

54. In 2001, the United States government designated HLF as a terrorist organization and froze its assets.³⁴

²⁹ Vidino, *supra* note 19, at 10-13.

³⁰ Pletka, *supra* note 19.

³¹ An IPT Rebuttal: CAIR’s Internet Myths and Facts, Investigative Project on Terrorism, at 5, <https://tinyurl.com/mpn2men9>.

³² CAIR’s Awad: In Support of the Hamas Movement, Investigative Project on Terrorism (Mar. 22, 1994), <https://tinyurl.com/4aj3cxnu> (panel discussion video including Nihad Awad).

³³ *United States v. El-Mezain*, 664 F.3d 467, 485-88 (5th Cir. 2011), *as revised* (Dec. 27, 2011).

³⁴ *Id.* at 487-88, 541.

55. In 2004, federal prosecutors indicted HLF and seven of its officials on charges of providing material support to Hamas.³⁵

56. In 2008, a federal jury convicted HLF and five of its former officers on 108 counts of providing over \$12 million in material support to Hamas, money laundering, and tax fraud.³⁶

57. Ghassan Elashi, a founding board member of CAIR's Texas chapter, was also a co-founder and former chairman of the Holy Land Foundation. In 2009, Elashi was sentenced to 65 years in federal prison for his role in financing Hamas.³⁷

58. The Holy Land Foundation conviction marked the largest terrorism financing prosecution in United States history.

59. In May 2007, federal prosecutors filed a list of unindicted co-conspirators in the Holy Land Foundation case. CAIR and its chairman emeritus Omar Ahmad were included on this list.³⁸

60. During the 2008 Holy Land Foundation trial, FBI Special Agent Lara Burns testified that CAIR "was a front group for Hamas" and that it was formed in the aftermath of a 1993 meeting by Palestinian activists in America who brainstormed ways to spread pro-Hamas messages here without attracting too much attention.³⁹

³⁵ Press Release, United States Department of Justice, Holy Land Foundation, Leaders, Accused of Providing Material Support to Hamas Terrorist Organization (July 27, 2004), <https://tinyurl.com/3n375939>.

³⁶ Press Release, United States Department of Justice, No Cash for Terror: Convictions Returned in Holy Land Case (Nov. 25, 2008), <https://tinyurl.com/ms8w8k3u>.

³⁷ *El-Mezain*, 664 F.3d at 485, 490.

³⁸ *United States of America v. Holy Land Foundation for Relief and Development, et al.*, No. 3:04-CR-240-G (N.D. Tex. 2008), Ex. A, List of Unindicted Co-Conspiratory and/or Joint Venturers, at 5-8, <https://tinyurl.com/r3e86c28>.

³⁹ *El-Mezain*, 664 F.3d at 513-15; Patrick Poole, *Terror-Linked Muslim Group Pressures Amazon Into Yanking Products, Facilitating Islamic Practices*, The Federalist (Jan. 24, 2019), <https://tinyurl.com/55z3mezd>.

61. Government exhibits introduced at the Holy Land Foundation trial included a 1994 Palestine Committee meeting agenda that listed CAIR as a member of the Palestine Committee alongside the Holy Land Foundation and other Hamas-support organizations.⁴⁰

62. In a July 2009 ruling, United States District Judge Jorge Solis stated: “The government has produced ample evidence to establish the associations of CAIR . . . with Hamas.”⁴¹

63. In a Department of Justice press release issued on November 24, 2008, following the Holy Land Foundation convictions, the government stated: “The government case included testimony that in the early 1990s, Hamas’ parent organization, the Muslim Brotherhood, planned to establish a network of organizations in the U.S. to spread a militant Islamist message and to raise money for Hamas HLF became the chief fundraising arm for the Palestine Committee in the U.S. created by the Muslim Brotherhood to support Hamas.”⁴²

FBI Suspension of Relations with CAIR

64. Following the Holy Land Foundation trial, the FBI formally severed its working relationship with CAIR- and issued a directive to all FBI field offices to cease formal contacts with the organization.⁴³

65. In a letter dated April 28, 2009, FBI Assistant Director Richard C. Powers wrote to United States Senator Jon Kyl explaining the basis for the FBI’s decision. Powers stated that evidence introduced at the Holy Land Foundation trial “demonstrated a relationship among

⁴⁰ *El-Mezain*, 664 F.3d at 501; Letter from Richard C. Powers, FBI Assistant Director, to Sen. Jon Kyl (Apr. 28, 2009), <https://tinyurl.com/2wjpdssx>.

⁴¹ *United States v. Holy Land Foundation for Relief and Development*, No. 3:04-CR-0240-P, 2009 WL 10680203, at *7 (N.D. Tex. July 1, 2009), *rev’d in part on other grounds*, 624 F.3d 685 (5th Cir. 2010).

⁴² Press Release, United States Department of Justice, Federal Judge Hands Downs Sentences in Holy Land Foundation Case (May 27, 2009), <https://tinyurl.com/5n7sz34u>.

⁴³ FBI Explains Its CAIR Cut Off, Investigative Project on Terrorism (May 7, 2009), <https://tinyurl.com/2f2zbcyp>.

CAIR, individual CAIR founders, and the Palestine Committee. Evidence was also introduced that demonstrated a relationship between the Palestine Committee and Hamas, which was designated as a terrorist organization in 1995.”⁴⁴

66. Powers further stated: “[U]ntil we can resolve whether there continues to be a connection between CAIR or its executives and HAMAS, the FBI does not view CAIR as an appropriate liaison partner.”⁴⁵

67. In congressional testimony on March 30, 2011, FBI Director Robert Mueller confirmed the FBI’s policy of suspending formal ties with CAIR, stating: “we do not have a relationship with CAIR” due to concerns about CAIR’s connections to Hamas.⁴⁶

68. In a letter dated February 2010 from Assistant Attorney General Ronald Weich to members of Congress, the Department of Justice reaffirmed that “the Department of Justice has not wavered in its conclusion that the internal records it possesses prove a connection” between CAIR and Hamas.⁴⁷

CAIR’s Organizational Structure and Operations

69. CAIR operates through a network of affiliated entities across the United States, including multiple locations in Texas. Despite public claims that “CAIR chapters are independently organized and operated,” the evidence demonstrates that CAIR-named entities function as components of a unified, centrally-controlled organization.⁴⁸

⁴⁴ See DOJ: CAIR’s Unindicted Co-Conspirator Status Legit, Investigative Project on Terrorism (Mar. 12, 2010).

⁴⁵ Investigative Project on Terrorism, *supra* note 43.

⁴⁶ FBI Chief: Muslim Brotherhood Supports Terrorism, Investigative Project on Terrorism (Feb. 10, 2011), <https://tinyurl.com/4afppsmx>.

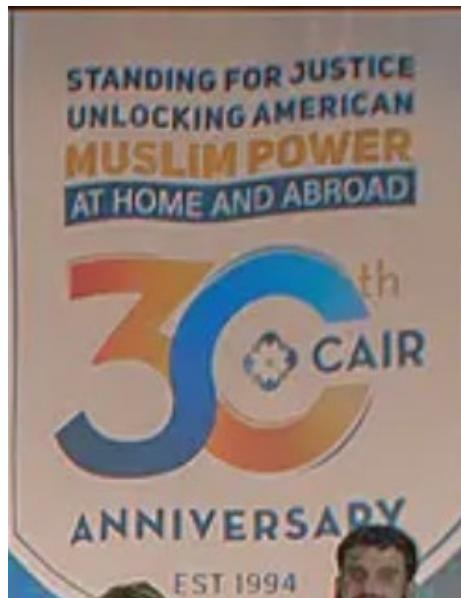
⁴⁷ Investigative Project on Terrorism, *supra* note 45.

⁴⁸ CAIR, CAIR: Who We Are, <https://tinyurl.com/4sxsu9py>.

70. CAIR consistently refers to locations in other states as its “offices” rather than independent chapters. In Texas, CAIR describes its operations as “CAIR Texas – Austin & Dallas-Fort Worth,” despite having made separate Secretary of State filings for the different cities. The unified Texas operation uses the website cairtx.org and presents itself as a single entity.⁴⁹

71. Officials and officers of various CAIR-named entities use centralized “@cair.com” email addresses regardless of their purported geographic location, indicating unified operational control.⁵⁰

72. In its annual reports, CAIR refers to “our national headquarters... and hundreds of staff...and volunteers who work at our offices nationwide,” indicating centralized operational control over entities it publicly claims are independent chapters.⁵¹



⁴⁹ See CAIR, Advisory Council – CAIR-TX, <https://tinyurl.com/mtbcr3xv>.

⁵⁰ See CAIR, CAIR Chapters Nationwide, <https://tinyurl.com/3vwz4u54>.

⁵¹ CAIR, National Annual Report—2017, <https://tinyurl.com/3mhnx92>.

73. CAIR's own organizational guidelines require that local "chapters" must "present a one-year plan...and sign an agreement to abide by...laws" established by the national organization, contradicting public claims of chapter independence.⁵²

74. Indeed, in 2024 CAIR and its local chapters celebrated its organizational continuity, marking its "30th Anniversary" and demonstrating that various CAIR-named entities consider themselves part of a continuous, unified organization dating back to 1994.⁵³



75. The organizational structure of CAIR reflects a pattern and practice of obfuscating the unified nature of the organization. Local "chapters" exist only with the approval of CAIR national, sign binding agreements with CAIR, use centralized email and communications systems,

⁵² CAIR, *supra* note 49.

⁵³ CAIR, CAIR Marks 30th Anniversary of Founding, Invites Guests to Attend Gala on Nov. 22nd, (Jun. 4, 2024), <https://tinyurl.com/5hbdr8ry>.

and are held out as local “offices” of a single national organization rather than independent entities.⁵⁴

76. In sum, CAIR is the American Chapter of the Muslim Brotherhood; CAIR-TX is the Texas Chapter of the Muslim Brotherhood; and each city chapter operates as that city’s chapter of the Muslim Brotherhood.

Official Designation of the Muslim Brotherhood as a Foreign Terrorist Organization

77. Hamas, which identifies itself as a wing of the Muslim Brotherhood in Palestine, was designated as a Foreign Terrorist Organization by the United States Department of State on October 8, 1997.⁵⁵

78. Multiple governments have designated the Muslim Brotherhood or its branches as terrorist organizations:

- a. Egypt designated the Muslim Brotherhood as a terrorist organization in December 2013.⁵⁶
- b. The United Arab Emirates designated the Muslim Brotherhood as a terrorist organization in November 2014.⁵⁷
- c. Saudi Arabia designated the Muslim Brotherhood as a terrorist organization in March 2014.⁵⁸

⁵⁴ CAIR, *supra* note 52.

⁵⁵ *El-Mezain*, 664 F.3d at 483-88, 541.

⁵⁶ BBC News, Egypt’s Muslim Brotherhood Declared ‘Terrorist Group,’ British Broadcasting Corporation (Dec. 25, 2013).

⁵⁷ BBC News, UAE labels Muslim Brotherhood Terrorist Group, British Broadcasting Corporation (Nov. 15, 2014), <https://tinyurl.com/4xv747yb>.

⁵⁸ Reuters, Saudi Arabia Declares Muslim Brotherhood ‘Terrorist Group,’ (Mar. 7, 2014), <https://tinyurl.com/nhd6a7tj>.

d. Bahrain designated the Muslim Brotherhood as a terrorist organization in March 2014.⁵⁹

Governor Abbott's Proclamation

79. On November 18, 2025, Texas Governor Greg Abbott issued a proclamation designating the Muslim Brotherhood and its American Chapter, CAIR, as both Foreign Terrorist Organizations under Texas Penal Code § 71.01(e) and Transnational Criminal Organizations under Texas Property Code § 5.254(a)(2)(A).⁶⁰

80. Governor Abbott's proclamation prohibits the Muslim Brotherhood and CAIR from purchasing or acquiring land in Texas and authorizes heightened enforcement measures against both organizations and their affiliates operating within Texas.⁶¹

81. The proclamation cited CAIR's origins following the 1993 Philadelphia Conference of Hamas operatives, its designation as an unindicted co-conspirator in the Holy Land Foundation terrorism financing trial, and the convictions of multiple CAIR officials and associates on terrorism-related charges.⁶²

President Trump's Executive Order

82. On November 24, 2025, President Donald J. Trump signed Executive Order 14362, titled "Designation of Certain Muslim Brotherhood Chapters as Foreign Terrorist Organizations and Specially Designated Global Terrorists."⁶³

⁵⁹ Al Jazeera, Bahrain Designates Muslim Brotherhood as Terrorist Group, (Nov. 16, 2014), <https://tinyurl.com/54nfhp7v>.

⁶⁰ Greg Abbott, Proclamation Declaring Muslim Brotherhood and CAIR Transnational Criminal Organizations, Office of the Texas Governor Greg Abbott, (Nov. 18, 2025), <https://tinyurl.com/2p7sxrsb>.

⁶¹ *Id.*

⁶² *Id.*

⁶³ Executive Order 14362, Designation of Certain Muslim Brotherhood Chapters as Foreign Terrorist Organizations and Specially Designated Global Terrorists, 90 FR 55033 (Nov. 24, 2025).

83. The Executive Order initiated a formal process for designating Muslim Brotherhood chapters in Lebanon, Jordan, and Egypt as Foreign Terrorist Organizations under 8 U.S.C. § 1189 and Specially Designated Global Terrorists under 50 U.S.C. § 1702 and Executive Order 13224.⁶⁴

84. The Executive Order cited specific post-October 7, 2023, activities by Muslim Brotherhood chapters:

- a. The military wing of the Lebanese Muslim Brotherhood (al-Jamaa al-Islamiyah) joined Hamas, Hezbollah, and other Palestinian factions to launch multiple rocket attacks against civilian and military targets within Israel.⁶⁵
- b. A senior leader of the Egyptian Muslim Brotherhood called for violent attacks against United States partners and interests on October 7, 2023.⁶⁶
- c. Jordanian Muslim Brotherhood leaders have provided material support to the militant wing of Hamas.⁶⁷

85. On January 13, 2026, pursuant to Executive Order 14362, the U.S. Department of the Treasury's Office of Foreign Assets Control and the Department of State designated the Egyptian Muslim Brotherhood, the Jordanian Muslim Brotherhood, and the Lebanese Muslim Brotherhood as Specially Designated Global Terrorists and Foreign Terrorist Organizations.⁶⁸

Muslim Brotherhood's Continuing Operations and Threat to Texans

86. The American Chapter of the Muslim Brotherhood operates nationally through a network of affiliated entities in thirty-two states with over five hundred employees across its organizational structure.⁶⁹

⁶⁴ *Id.*

⁶⁵ *Id.*

⁶⁶ *Id.*

⁶⁷ *Id.*

⁶⁸ Press Release, Treasury and State Departments Designate Muslim Brotherhood Branches as Terrorist Organizations, United States Treasury Department (Jan. 13, 2026), <https://tinyurl.com/2skjymua>.

⁶⁹ Pletka, *supra* note 19.

87. Ghassan Elashi, who co-founded CAIR's Texas chapter and served on its founding board of directors, was convicted in 2009 on 21 federal counts including conspiracy to provide material support to Hamas. Elashi was sentenced to 65 years in federal prison for his role in funneling \$12.4 million to Hamas through the Holy Land Foundation.

88. Despite Elashi's conviction and CAIR's designation as an unindicted co-conspirator in the largest terrorism financing prosecution in United States history, CAIR-Texas continues to operate using the organizational structure and networks established by individuals with documented ties to Hamas and the Muslim Brotherhood's Palestine Committee.

Terrorist Activity in Texas by Muslim Brotherhood-Inspired Groups

89. The Muslim Brotherhood's ideology and organizational model have directly influenced numerous terrorist organizations, including Al-Qaeda and ISIS.⁷⁰ While these groups have evolved separately from the Muslim Brotherhood, they share its foundational ideology and methods. Adherents of these Muslim Brotherhood-inspired groups have repeatedly attempted to carry out or successfully executed terrorist attacks in Texas:

- a. In 2006, a Pakistan national, Adnan Mirza, in Texas on a student visa, trained for a terrorist attack with others on weekend camping trips on at least six separate occasions at a location on the north side of Houston. Mirza further sought to provide material support to the Taliban.⁷¹
- b. On November 5, 2009, United States Army officer Nidal Hasan conducted a terrorist attack in support of Al Qaeda at Fort Hood near Killeen, Texas, which left thirteen dead and over thirty wounded.⁷²

⁷⁰ Counter Extremism Project, *The Muslim Brotherhood's Ties to ISIS and Al-Qaeda* (May 2019), <https://tinyurl.com/34ze5hwf>.

⁷¹ *United States v. Mirza*, 454 F. App'x 249, 254 (5th Cir. 2011); Jury Convicts Adnan Mirza of Conspiring to Support the Taliban and Unlawful Possession of Firearms, FBI (May 27, 2010), <https://tinyurl.com/22za36by>.

⁷² Lee Ferran & James Gordon Meek, *US Army Officer-Turned-Terrorist Thought Fort Hood Attack Would Save Mother's Soul*, Letters Show, ABC (Oct. 18, 2018), <https://tinyurl.com/ywbu7t92>.

- c. On May 3, 2015, two men inspired by ISIS conducted an attack at the Curtis Culwell Center in Garland, Texas.⁷³
- d. On January 15, 2022, Malik Faisal Akram took four hostages at the Congregation Beth Israel in Colleyville, Texas, seeking the release of Aafia Siddiqui, an Al-Qaeda operative serving an 86-year sentence in Fort Worth.⁷⁴
- e. On July 1, 2022, Jaylyn Christopher Molina, a resident of Cost, Texas, was convicted of “conspiring to provide material support to ISIS.”⁷⁵
- f. On June 29, 2023, Kaan Sercan Damlarkaya of Houston, Texas was convicted of providing material support to ISIS. Damlarkaya attempted to travel overseas to join ISIS. In the event this failed, Damlarkaya was determined to attack non-Muslims in the United States and become a martyr.⁷⁶
- g. On October 10, 2023, Warren Christopher Clark, a resident of Sugar Land, TX, pleaded guilty to traveling overseas to receive military training from ISIS.⁷⁷
- h. On November 14, 2024, Anas Said, a resident of Houston, Texas, was arrested for providing material support to ISIS. After the October 7, 2023, attack on Israel, Said created and disseminated ISIS propaganda.⁷⁸
- i. On around December 29, 2025, the United States charged John Michael Garza, Jr., of Midlothian, Texas, “with the offense of attempting to provide material support or resources to a designated foreign terrorist organization after he brought various bomb-making materials to a meeting on Monday evening, Dec. 22, [2025] and gave them to an individual he allegedly believed was an ISIS ‘brother.’”⁷⁹

90. In an ever-present sign of the danger to Texans, Ghassan Elashi, who was convicted of sending millions of dollars to the Palestine Committee of the Muslim Brotherhood and founded

⁷³ J.D. Miles, *Retired Garland Security Officer Reflects on ISIS-Inspired Terror Attack 10 Years Later*, CBS News (May 1, 2025), <https://tinyurl.com/5ea74p9m>.

⁷⁴ Luke Barr, Aaron Katersky, Habibullah Khan, Josh Margolin, & Morgan Winsor, *Alleged Hostage-Taker at Texas Synagogue Was Known to British Authorities, Sources Say*, ABC News (Jan. 18, 2022), <https://tinyurl.com/4h2csehv>.

⁷⁵ *Terror Threat Snapshot: Foreign Jihadist Networks and Homegrown Violent Extremism: A Persistent Terror Threat to America*, Committee on Homeland Security (2025), <https://tinyurl.com/47m4yh7v>.

⁷⁶ *See id.*

⁷⁷ *See, e.g.*, Press Release, Fort Bend Man Sentenced for Receiving Military Training from a Designated Foreign Terrorist Organization, FBI (February 8, 2024), <https://tinyurl.com/229ktkte>.

⁷⁸ Committee on Homeland Security, *supra* note 75.

⁷⁹ Press Release, *Texas Man Charged with Providing Bomb Components and Funding to Individuals He Believed Were Involved with Foreign Terrorist Organization*, DOJ (December 29, 2025), <https://tinyurl.com/f7rbn7p2>.

the American and a Texas Chapter of the Muslim Brotherhood, served in leadership positions in other Muslim Brotherhood Chapters with Nihad Awad.⁸⁰

CAIR's Support for Campus Disruption and Violence

91. The American Chapter of the Muslim Brotherhood has provided organizational, financial, and rhetorical support to campus protests and demonstrations that have resulted in violence, property destruction, and criminal activity at universities across the United States, including in Texas.

92. In April 2024, at the University of Texas at Austin, protesters engaged in violent activities, including bringing weapons to demonstrations, vandalizing police vehicles, and physically assaulting a law enforcement officer. CAIR publicly supported these protests.⁸¹

93. CAIR established a scholarship program titled “Champions of Justice” for students who engaged in criminality and violence in campus protests, providing financial rewards to individuals who engaged in unlawful activity.⁸²

94. CAIR’s support for financial benefits to individuals engaged in illegal protest activity parallels the “pay for slay” funding supported by Hamas, provides monthly stipends to the families of terrorists who are imprisoned or killed while carrying out attacks against Israeli civilians.⁸³

⁸⁰ Vidino, *supra* note 19, at 13-14.

⁸¹ Adrienne Lee, *Frequently Asked Questions About Recent Protests* UT Austin News - The University of Texas at Austin, (May 3, 2024), <https://tinyurl.com/5n6upjfa>; CAIR-Austin, *PSC to Respond to Arrests of Anti-Genocide Protesters*, CAIR, (Apr. 28, 2024), <https://tinyurl.com/5n8yvx25> (noting that the American Chapter supports protests that it has been calling “peaceful.”).

⁸² Isabel Vincent, *Muslim Group CAIR Cutting \$1,000 Checks for Anti-Israel Agitators Who Have Been Disciplined by Colleges*, NY Post (Nov. 18, 2025), <https://tinyurl.com/4w53fjd2>; Mitchell Bard, *CAIR’s ‘Pay-for-Jew-Hatred’ Policy*, JNS (Dec. 3, 2025), <https://tinyurl.com/4th453xm>.

⁸³ Isabel Kershner, *Israel Penalizes Palestinians for Payments to Prisoners and ‘Martyrs’*, NY Times (July 3, 2018), <https://tinyurl.com/29hz3xsx>; Abbas Risks Palestinian Backlash Over Overhaul of Prisoner Payments, Reuters (Feb. 11, 2025), <https://tinyurl.com/49j4ub8x>.

95. CAIR has coordinated with and provided support to Students for Justice in Palestine (SJP), an organization that operates in coordination with Hamas and has been responsible for violence and disruption on college campuses across the United States, including in Texas.⁸⁴

96. On October 15, 2024, the United States Department of the Treasury designated Samidoun Palestinian Prisoner Solidarity Network as a sham charity that serves as an international fundraiser for the Popular Front for the Liberation of Palestine (PFLP), a specially Designated Global Terrorist entity.⁸⁵ Samidoun, like CAIR, has coordinated protests nationwide.⁸⁶

97. The Muslim Brotherhood, through its American affiliate CAIR and associated organizations, continues to pose a clear and present danger to the safety and security of Texans.

V. CAUSES OF ACTION

Count I:

Temporary and Permanent Injunctive Relief Against the Muslim Brotherhood’s Texas Operations

98. The Texas Civil Practice and Remedies Code authorizes injunctive relief in relevant circumstances:

- a. Where an applicant is entitled to the relief demanded and all or part of the relief requested requires the restraint of some act prejudicial to the applicant, Tex. Civ. Prac. & Rem. Code § 65.011(1); and
- b. Where irreparable injury to real or personal property is threatened, irrespective of any remedy at law, Tex. Civ. Prac. & Rem. Code § 65.011(5).

⁸⁴ Donna King, *Federal Lawsuit Alleges Students for Justice in Palestine Is a Hamas Front Group*, Carolina Journal (2024), <https://tinyurl.com/3vz9hm3m>; see also *Parizer v. AJP Educ. Found., Inc.*, No. 1:24-CV-724 (RDA/IDD), 2025 WL 2382933 (E.D. Va. Aug. 15, 2025, pet. filed).

⁸⁵ Press Release, *United States and Canada Target Key International Fundraiser for Foreign Terrorist Organization PFLP*, United States Treasury Department (Oct. 15, 2024), <https://tinyurl.com/5n7uxua4>.

⁸⁶ Danielle Pletka, *The Antisemitism Money and Power Network—and How to Smash It*, AEI (Jun. 17, 2024), <https://tinyurl.com/3bn5bf8u>; *Who are the Primary Groups Behind the U.S. Anti-Israel Rallies?*, ADL (Nov. 8, 2023), <https://tinyurl.com/yc49zpkc>.

99. As a sovereign entity, Texas has an “intrinsic right to enact, interpret, and enforce its own laws.”⁸⁷

100. Furthermore, to enjoin a statutory violation based on equitable principles, equitable requirements must be met.⁸⁸ These equitable considerations, which are met in this case, are as follows:

- a. the existence of a wrongful act, the Muslim Brotherhood’s (“Defendants” or “Muslim Brotherhood”) ongoing and threatened criminal and terroristic conduct;
- b. the existence of imminent harm, specifically the risk that Texans become victims of crime and terrorism;
- c. the existence of irreparable injury, namely any of the injuries that Texans could suffer would clearly not be compensable nor could they be measured by any certain pecuniary standard; and
- d. the absence of an adequate remedy at law, due to the Muslim Brotherhood’s transitory nature and constantly morphing structure.

101. In addition to Texas’s entitlement to an injunction against the Muslim Brotherhood’s operation, the Governor has taken related actions.

102. The Governor has issued a Proclamation. Once issued, the Attorney General has the authority to enforce the Governor’s proclamation.⁸⁹

103. On November 18, 2025, Texas Governor Greg Abbott noted that the Muslim Brotherhood, is a “transnational Islamist organization,” with a “localized,” structure, and designated the Muslim Brotherhood, and its operational entity, the American Chapter, as both a Foreign Terrorist Organization and a Transnational Criminal Organization.

⁸⁷ *State v. Naylor*, 466 S.W.3d 783, 790.

⁸⁸ *Butnaru v. Ford Motor Co.*, 84 S.W.3d 198, 210–211 (Tex. 2002) (citations omitted).

⁸⁹ Tex. Const. art. IV, § 22.

104. As an organization with a secretive, localized, and cell-like structure, the Muslim Brotherhood’s systemic and unlawful activities cannot be reduced to certain specific places within the State. Instead, the group organizes underground and then engages in unpredictable patterns of violence—the risk of which Governor Abbott has identified and sought to prevent.

105. **First**, although the Muslim Brotherhood is not organized or registered with the Texas Secretary of State, it is, by definition, an unincorporated nonprofit association, subject to Texas law.⁹⁰ And, as an unincorporated nonprofit association operating in Texas, the Muslim Brotherhood is considered a “domestic entity”⁹¹ that must abide by the laws of the State and any proclamations of the Governor.

106. **Second**, CAIR-Texas Inc., (CAIR-TX), the Council on American Islamic Relations-Texas, Dallas Forth Worth, and the Council on American Islamic-Relations, Austin, Texas (CAIR-Austin), which comprise the American Chapter of the Muslim Brotherhood are incorporated non-profits and are likewise domestic entities under State law.⁹²

107. To this end, domestic entities “may not” engage in terrorism,⁹³ as it is expressly unlawful or prohibited by a law of this State.⁹⁴

108. Because Texas Governor Greg Abbott has specifically declared that the Muslim Brotherhood and the American Chapter are systemically engaged in activities that are unlawful under Chapter 71 of the Texas Penal Code and **precluded from owning Texas property via Chapter 5 of the Texas Property Code**, the Court should enter temporary and permanent

⁹⁰ See Tex. Bus. Orgs. Code § 252.001(2) (definition of nonprofit unincorporated association).

⁹¹ See Tex. Bus. Orgs. Code §1.002(18).

⁹² See *id.*

⁹³ See e.g., Tex. Penal Code §§ 71, 76; *see also* Tex. Bus. Orgs. Code § 2.003.

⁹⁴ See e.g., Tex. Bus. Orgs. Code § 2.003(1).

injunctive relief against the Muslim Brotherhood and the American Chapter prohibiting it from engaging in any additional acts within the State of Texas.

Count II:

Uniform Declaratory Judgments Act

109. “A court of record within its jurisdiction has power to declare rights, status, and other legal relations whether or not further relief is or could be claimed.”⁹⁵

110. The State contends that the Muslim Brotherhood is a Foreign Terrorist Organization under Texas Penal Code § 71.01(e) and a Transnational Criminal Organization, pursuant to Texas Property Code § 5.254(a)(2)(A).

111. *First*, pursuant to Texas Penal Code § 71.01(e), a Foreign Terrorist Organization means “three or more persons operating as an organization at least partially outside the United States who engage in criminal activity and threaten the security of this state or its residents.”

112. The Muslim Brotherhood, which operated the Texas-based HLF, the organization that is comprised of members both in Texas and abroad, has been found to have engaged in criminal activity that threatens the security of the State and its residents, and continues to do so through its membership in Texas and abroad.⁹⁶

113. Today, the Muslim Brotherhood continues to engage in criminal activity and threaten the security of the state and its residents.

114. Therefore, this Court should declare that the Muslim Brotherhood is a Foreign Terrorist Organization under Texas Penal Code § 71.01(e).

⁹⁵ Tex. Civ. Prac. & Rem. Code § 37.003(a).

⁹⁶ *See supra* ¶ 78.

115. **Second**, pursuant to Texas Property Code § 5.254, this Court may designate a transnational criminal organization entity as subject to the prohibition on purchase or acquisition of real property.

116. Moreover, pursuant to Texas Property Code § 5.251(7) a “Transnational criminal organization” means “two or more persons: (a) who are citizens of or domiciled in a designated country; (b) with an identifiable leadership who operate internationally; and (c) who continuously or regularly associate to engage in corruption, violence, or the commission of other criminal activities.”

117. The Muslim Brotherhood, comprised of both Texas and foreign citizens, consists of a leadership structure based out of the United Kingdom. By direction of leadership of the Muslim Brotherhood, the organization has repeatedly engaged in corruption and violence, further engaging in the material support of terrorism, in addition to various other criminal activities in furtherance of the mission of the Muslim Brotherhood.⁹⁷

118. Therefore, this Court should declare that the Muslim Brotherhood is a Transnational Criminal Organization, pursuant to Texas Property Code § 5.254(a)(2)(A).

119. Further relief, such as injunctions, can be granted for the purpose of enforcing a declaratory injunction where the evidence shows that a party will not comply with the judgment and that such relief is necessary and proper.⁹⁸ That is, parties are allowed to combine a request for declaratory relief with a request for injunction.⁹⁹

⁹⁷ The White House, *supra* note 15; *see supra* ¶¶ 33-34.

⁹⁸ *State v. Anderson Courier Serv.*, 222 S.W.3d 62, 65-66 (Tex. App.—Austin 2005, pet. denied.); Tex. Civ. Prac. & Rem. Code Ann. § 37.011.

⁹⁹ *Weaver v. AIDS Servs. Of Austin, Inc.*, 835 S.W.2d 798, 803 (Tex. App.—Austin 1992, writ denied).

120. Texas asks that the Court declare that the Muslim Brotherhood is a Foreign Terrorist Organization under Texas Penal Code § 71.01(e) and a Transnational Criminal Organization, pursuant to Texas Property Code § 5.254(a)(2)(A), in accordance with Governor Abbott's Proclamation.

121. Moreover, in any proceeding for declaratory judgment, the court may award costs and reasonable and necessary attorney's fees as are equitable and just.¹⁰⁰ The State, pursuant to Section 37.009 of the Texas Civil Practice and Remedies Code, requests all costs and reasonable and necessary attorney's fees incurred to be awarded, including all fees necessary in the event of an appeal of this cause to the Court of Appeals and the Supreme Court of Texas, as the Court determines to be equitable and just.

Count III:

Abatement of a Public Nuisance

122. Section 125.062 of the Texas Civil Practice and Remedies Code states that a "foreign terrorist organization that continuously or regularly associates in gang activities is a public nuisance."

123. The statute defines "gang activities" as, among other things, the following types of conduct: (1) Organized criminal activity as described by § 71.02 of the Penal Code; (2) terroristic threats as described by § 22.07 of the Penal Code; and (3) coercing, inducing, or soliciting membership in a foreign terrorist organization as described by § 71.022(a) or (a-1) of the Penal Code.

¹⁰⁰ Tex. Civ. Prac. & Rem. Code Ann. § 37.009.

124. Section 125.062 of the Civil Practice and Remedies Code states that a foreign terrorist organization that continuously or regularly associates in gang activities is a public nuisance.

125. Section 125.064 of the Civil Practice and Remedies Code gives the Attorney General express authority to sue to enjoin a public nuisance under the statute. And if the suit is brought by the State, the Petition does not require verification.

126. If the court finds that the foreign terrorist organization constitutes a public nuisance, the court may enter an order enjoining the foreign terrorist organization from further engaging in the gang activities and impose other reasonable requirements to prevent the foreign terrorist organization from engaging in future gang activities.¹⁰¹

127. Further, if the court finds that a place is habitually used in a manner that constitutes a public nuisance, the court may include in its order reasonable requirements to prevent the use of the place for gang activity.¹⁰²

128. Here, as indicated *supra*, the Muslim Brotherhood has been designated: (1) a Foreign Terrorist Organization under Texas Penal Code § 71.01(e); and (2) a Transnational Criminal Organization, pursuant to Texas Property Code § 5.254(a)(2)(A), in accordance with Governor Abbott's Proclamation, and has engaged in organized criminal activity, including but not limited to coercing, inducing, or soliciting membership in a foreign terrorist organization as described by § 71.022(a) or (a-1) of the Penal Code that has both materially supported, and engaged in terrorist attacks.

¹⁰¹ Tex. Civ. Prac. & Rem. Code § 125.065(a)(1)-(2).

¹⁰² Tex. Civ. Prac. & Rem. Code § 125.065(b).

129. The State, through Attorney General, and as permitted by law, seeks to abate this public nuisance by prohibiting the Muslim Brotherhood from continuing to engage in the aforementioned gang activities, and seeks reasonable requirements prohibiting said activity.

VI. PRAYER FOR RELIEF

Texas incorporates by reference the preceding paragraphs as if fully set forth herein. Texas respectfully prays that the Court enter judgment in its favor and order the following:

- a. Declaratory relief that:
 - i. All Defendants are: (1) a Foreign Terrorist Organization under Texas Penal Code § 71.01(e); and (2) a Transnational Criminal Organization, pursuant to Texas Property Code § 5.254(a)(2)(A), in accordance with Governor Abbott's Proclamation;
 - b. Temporary and permanent injunctive relief prohibiting all Defendants from engaging in any activities within the State of Texas; or, in the alternative
 - c. Temporary and permanent injunctive relief prohibiting all Defendants from engaging in the following gang activities under Tex. Civ. Prac. & Rem. Code § 125.061:
 - i. Any organized criminal activity as described by section 71.02 of the Texas Penal Code;
 - ii. Making any terroristic threats as described by section 22.07 of the Texas Penal Code;
 - iii. Coercing, inducing, or soliciting membership in the Foreign Terrorist Organization as described by section 71.022(a) or (a-1) of the Texas Penal Code; and
 - d. Temporary and permanent injunctive relief imposing any other reasonable requirements on Defendants under Tex. Civ. Prac. & Rem. Code § 125.065(2) for the purpose of preventing the Foreign Terrorist Organization from engaging in any future gang activities, such as, but not limited to:
 - i. Raising money in the State of Texas for the purpose of furthering the organization's mission; and

- ii. Soliciting membership into the organization within the State of Texas.
- e. Attorneys' fees and all costs and expenses to which the State is entitled; and
- f. Any and all further relief to which the State may be entitled.

Dated: February 5, 2026.

Respectfully submitted,

KEN PAXTON
Attorney General of Texas

BRENT WEBSTER
First Assistant Attorney General

RALPH MOLINA
Deputy First Assistant Attorney General

AUSTIN KINGHORN
Deputy Attorney General for Civil Litigation

JOHNATHAN STONE
Chief for Consumer Protection Division

/s/ Jacob E. Przada
JACOB E. PRZADA
Assistant Attorney General
State Bar No. 24125371
Jacob.Przada@oag.texas.gov

ROB FARQUHARSON
Deputy Chief for Consumer Protection Division
State Bar No. 24100550
Rob.Farquharson@oag.texas.gov

Office of the Attorney General
Consumer Protection Division
P.O. Box 12548, MC-010
Austin, Texas 78711-2548
Telephone No. 512-463-2185
Facsimile No. 512-473-8301

ATTORNEYS FOR THE STATE OF TEXAS