# IN THE UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

CAIR FOUNDATION, INC., d/b/a
COUNCIL ON AMERICAN-ISLAMIC
RELATIONS, & CAIR,

Plaintiff,

v.

ASMA LORI HAIDRI SAROYA a.ka. LORI SAROYA, ASMA SAROYA, LORI HAIDRI, LORI HAIDRI-SAROYA, & LH,

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Civil Action No: 0:21-cv-01267

# **COMPLAINT**

Plaintiff, CAIR FOUNDATION, INC., d/b/a Council on American-Islamic Relations and CAIR ("CAIR"), files this complaint against Defendant Asma Lori Saroya ("Saroya"), a former CAIR employee, for (1) defamation; (2) defamation per se; (3) tortious interference with business relationships; and (4) misappropriation of confidential information. In support thereof, CAIR alleges as follows:

### **INTRODUCTION**

1. CAIR is the nation's largest grass-roots Muslim civil rights and advocacy organization. CAIR is headquartered on Capitol Hill in Washington, D.C. It has 26 regional affiliates nationwide, including CAIR Minnesota, which is headquartered in Minneapolis, Minnesota.

- 2. Since its establishment in 1994, CAIR has worked to promote a positive image of Islam and Muslims in America. Its mission is to enhance understanding of Islam, encourage dialogue, protect civil liberties, empower American Muslims, and build coalitions that promote justice and mutual understanding.
- 3. CAIR's litigation and civil rights department counsels, mediates, and advocates on behalf of Muslims and others who have experienced religious discrimination, defamation, or hate crimes. The department works to protect and defend the constitutional rights of American Muslims, thereby supporting the rights of all Americans.
- 4. CAIR is headquartered on Capitol Hill in Washington, D.C. That office is known as CAIR-National.<sup>1</sup>
  - 5. CAIR's chapters are wholly separate legal entities from CAIR-National.
- 6. Defendant Saroya once worked for CAIR-Minnesota. Saroya was also a former CAIR-National Chapter Development Director and a former national board member.
  - 7. Saroya has not been affiliated with CAIR since 2018.
- 8. In 2021, Saroya founded a "competing" organization: the "American Muslim Civil Rights Center" in Minneapolis.
- 9. Saroya also claims to be a "diversity trainer, civil rights activist, [and] nonprofit leader." See Saroya's website, attached hereto as **Exhibit A.**
- Saroya holds a bachelor's degree from St. Catherine University in St. Paul,
   Minnesota, as well as a law degree from Mitchell Hamline School of Law in St. Paul, Minnesota.

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<sup>&</sup>lt;sup>1</sup> For this *Complaint*, CAIR and CAIR-National may be used interchangeably.

- 11. Since her departure from CAIR in 2018, Saroya has been actively engaging in a systemic and continuous internet smear campaign to damage CAIR's reputation and to cause CAIR severe economic harm.
- 12. For several years, Saroya published false statements about CAIR on multiple public social media platforms and websites using various forms of her name, initials, and pseudonyms.
- 13. Hiding behind anonymity, Saroya's false and defamatory lies have likely been viewed by many thousands of individuals domestically and abroad.
- 14. In addition to her internet harassment campaign, Saroya misappropriated confidential information that she obtained during her employment with CAIR and is using that confidential information to send hateful and false allegations against CAIR to CAIR's partners, donors, and religious leaders.
- 15. Saroya has targeted her disparaging messages to local news organizations and asked those news organizations to cease writing positive articles about CAIR and its mission to cultivate and promote positive American and Islamic relationships.
- 16. Saroya has published hundreds of disturbingly false allegations against CAIR on the internet and in specific targeted communications over the course of several years.
- 17. Saroya knew her false statements would be read by people around the world and reported on in the news media, and, as a result, that CAIR would be subjected to threats of violence from extremist organizations and suffer economic and reputational harm.
- 18. Saroya's malicious, public attack on CAIR had no purpose other than to attempt to destroy CAIR's reputation and to induce and coerce CAIR's partners, donors, and religious leaders to discontinue their relationships with CAIR and any corresponding charitable giving or funding.

- 19. Saroya seemingly hopes to destroy CAIR and steer those donors to her own "American Muslim Civil Rights Center" in Minnesota.
- 20. Due to her defamatory publications and tortious interference, CAIR's reputation in the community and its business relationships have been damaged.
- 21. Saroya's defamatory messages are now being used by anti-Muslim and anti-Islamic extremists to further discriminate against and alienate the population of individuals that Saroya claimed to be protecting as an employee of CAIR.
- 22. In 2019, Saroya even retained a well-known Islamophobic and anti-Muslim attorney, who, on Saroya's behalf, threatened to move the United States Attorney General to classify CAIR as a foreign agent and to file a lawsuit against CAIR claiming that CAIR committed racketeering, wire fraud, mail fraud, embezzlement, threats, blackmail, obtaining donations under threat, laundering of foreign funds, conspiracy with criminals, fraud against the United States, conspiracy with outlawed groups and violent individuals, and other criminal and terroristic acts.
- 23. Saroya's public lies are damaging CAIR and the American Muslim community in ways that are significant and long lasting.
- 24. The examples of Saroya's unlawful conduct set forth herein can in no way capture the breadth of Saroya's obsessive, defamatory postings against her former employer.

# **JURISDICTION**

25. This Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1332 because the amount in controversy in this matter exceeds \$75,000 and the action is between citizens of different states.

- 26. This Court has personal jurisdiction over Defendant because she is a citizen of the state of Minnesota.
- 27. Venue is proper in this judicial district, pursuant to 28 U.S.C. § 1391(b), because the Defendant is subject to personal jurisdiction in this District and because many of the acts complained of giving rise to the claims herein occurred in this District.

### **THE PARTIES**

- 28. CAIR is a non-profit 501(c)(3) corporation incorporated in the District of Columbia with its headquarters and principal place of business located at 453 New Jersey Avenue, S.E., Washington, D.C., 20003.
- 29. Saroya is a former employee of CAIR and is a citizen and resident of the State of Minnesota. Saroya uses many versions of her birth name in her publications, including "Lori Saroya," "Asma Saroya," "Lori Haidri," "LH," and "Lori Haidri-Saroya." For the purpose of this *Complaint*, all references to any of these names refer to Defendant Saroya.

#### **FACTS**

- 30. In 2007, Saroya became employed by CAIR-Minnesota and served as the Chapter's Executive Director.
- 31. She remained in that position until she began her employment with CAIR-National on or about March 2, 2016.
  - 32. At CAIR-National, she served as CAIR's National Chapter Development Director.
  - 33. Saroya also served on CAIR's Board of Directors.
- 34. At the outset of her employment with CAIR, and as a condition thereof, Saroya executed a *Confidentiality and Nondisclosure Agreement ("Agreement")*. See Saroya's Confidentiality Agreement, attached hereto as **Exhibit B.**

- 35. Pursuant to the *Agreement*, Saroya agreed to preserve the confidentiality of CAIR's confidential information, including presentation and training manuals, legal research, marketing materials, mailing lists, donor or supporter information, business plans, and any other valuable information or practices of CAIR ("Confidential Information"). <u>Id</u>.
  - 36. In the *Agreement*, Saroya:
    - Acknowledged the confidential nature of CAIR's Confidential Information, including information that CAIR maintained and safeguarded regarding its donors and supporters;
    - Promised not to disclose CAIR's Confidential Information to third parties;
    - Promised to return CAIR's Confidential Information in her possession upon the termination of her employment;
    - Promised not use the Confidential Information in any way except for the purposes authorized by CAIR; and
    - Agreed to use her best efforts to prevent and protect the Confidential Information from falling into the public domain.

Id.

- 37. After securing Saroya's agreement to comply with these important obligations, CAIR gave Saroya access to CAIR's Confidential Information, including access to donors and supporters.
- 38. Saroya's employment at CAIR-National was fraught with complaints, issues, and conflicts.
- 39. Over the course of her two-year employment, multiple employees—both at CAIR-National and the various CAIR chapters—registered complaints against Saroya. These complaints alleged that Saroya: (1) acted aggressively and with hostility towards other CAIR staff members, including female staffers; (2) appeared to be unable to properly manage and deal with conflicts; and (3) routinely attempted to "order around staff" whom she did not supervise.
- 40. As a result of these complaints, Nihad Awad ("Awad"), CAIR's National Executive Director, requested that Saroya attend conflict resolution training in December 2016.

- 41. Saroya's hostile behavior towards CAIR employees only escalated.
- 42. After receiving multiple complaints from CAIR staff members regarding Saroya's interactions with them, Awad issued to Saroya a written warning regarding her mistreatment of her fellow employees on August 4, 2017.
- 43. The warning informed Saroya that her behavior was crippling CAIR's ability to properly function as an organization.
  - 44. Awad ordered Saroya to complete conflict resolution training within sixty days.
  - 45. Despite the written warning, Saroya's misconduct escalated.
- 46. On January 1, 2018, a female chapter staffer filed a formal complaint against Saroya alleging that Saroya's behavior was creating a hostile work environment and a culture of fear in the workplace.
- 47. Due to Saroya's alleged harassment, the female staffer stated that she was concerned for her physical safety and considering filing a restraining order against Saroya.
- 48. After receiving the female staffer's formal written complaint against Saroya for workplace harassment, CAIR-National launched an investigation into the allegations.
- 49. On January 13, 2018, amid this investigation, Saroya abruptly announced that she intended to resign and that her resignation would be effective May 11, 2018.
- 50. In or around May 2018, just prior to her agreed upon resignation date, Saroya attended a CAIR retreat. During that retreat, Saroya was observed screaming at her staff and behaving unprofessionally. Some of her staff members were in tears. That evening, Awad pulled Saroya aside and admonished her for her behavior
  - 51. Saroya's employment ended on May 11, 2018.

# Saroya Resigns from CAIR and Begins a Defamation Campaign Aimed at Destroying the National Organization

- 52. Almost immediately upon resigning from CAIR in May 2018, Saroya started a defamation campaign aimed solely at destroying her former employer's reputation and funding base in every way possible. She continues her war on CAIR to this day.
- 53. Saroya's coordinated attack has taken place and is continuing to take place on three separate and distinct fronts:
  - Saroya attempted to destroy CAIR-National's relationship with its affiliated chapters by falsely claiming that CAIR-National was not disbursing grant funds intended for the chapters;
  - ii. Saroya is attempting to destroy CAIR-National's reputation in the community by publishing a numerous hateful and disparaging statements about CAIR online using various social media platforms; and
  - iii. Saroya is attempting to destroy CAIR's relationship with its donors and event partners by contacting these organizations and accusing CAIR of committing civil and criminal misconduct.

#### Saroya Defames CAIR to CAIR Chapters

- 54. In June 2018, Saroya attempted to use defamatory statements related to grant disbursements to destroy CAIR-National's relationship with its affiliate chapters and one of its donors, Solidarity Giving. Solidarity Giving is an "advised fund" of Silicon Valley Community Foundation.
- 55. It is aimed at supporting organizations that advance social justice, promote civil engagement, and serve threatened communities around the country.

- 56. During Saroya's employment with CAIR, Solidarity Giving awarded CAIR two grants: a \$100,000 grant for general support and a \$500,000 grant earmarked for chapter support. As the former National Chapter Development Director, Saroya was responsible for the administration of the chapter support grant from its inception until her resignation.
- 57. In June 2018, just a month after resigning her employment from CAIR-National, Saroya emailed staff members of various CAIR chapters across the country and falsely stated that:
  - a. Solidarity Giving required the grant funds to be given directly to chapters (as opposed to being used by CAIR-National for chapter development);
  - b. CAIR is holding on to the money to spend it on itself and has refused to disperse
    it to the chapters;
  - c. during her employment, she had attempted to disburse the funds to chapters, but
    was prevented from doing so by the then CAIR controller and Executive Director
    Awad; and
  - d. she attempted to use the money to hold conferences for the chapters, but CAIR
     did not permit her to do so.

See Saroya's June 2018 emails to chapters, attached hereto as Exhibit C.

- 58. Saroya sent the communication to several chapter leaders and staff members, including staff members at CAIR-Greater Los Angeles, CAIR-Ohio, and CAIR-Georgia, to name a few.
- 59. At the time Saroya made each of these remarks related to the grant, she knew them to be false. Her intent behind making the false statements was to damage CAIR's relationship with its affiliate chapters and Solidarity Giving.

- 60. Specifically, as administrator of the chapter grant, Saroya was aware that the grant documents were given for "general support of the chapters." During her employment with CAIR, Saroya had budgeted a portion of the funds to be used to hire a CAIR-National chapter outreach coordinator and to offer seminars across the country. Had she believed the money to be for cash payments to chapters, Saroya would not have recommended hiring a CAIR-National employee or offering seminars. Accordingly, when she stated that CAIR was required to give the funds directly to the chapters, she knew that statement was false.
- 61. Additionally, during Saroya's employment with CAIR, CAIR used the grant to hold two significant trainings for chapter staff. CAIR-National paid for all of its chapters to travel to San Francisco for one training conference and to Washington, D.C. for a second training conference. The trainings, both of which Saroya was integral in planning, cost over \$100,000. In addition to these conferences, CAIR-National also hired a developer to create a national civil rights database for its chapters and paid for Dropbox licensing for all chapters. The grant that Saroya administered paid for both the chapter trainings and the database. When Saroya stated that CAIR-National was holding onto the grant to use the money for itself, Saroya knew that statement was false. When she stated that CAIR-National prevented her from putting on conferences for the chapters, she knew that statement to be false as well.
- 62. In her publications to the chapter representatives, Saroya instructed CAIR chapter representatives to contact Solidarity Giving directly.
- 63. Saroya gave this instruction so that her defamatory publications could be further disseminated, intending to irreparably harm and tortiously interfere with CAIR's contractual and business relationship with Solidarity Giving.

- 64. On October 18, 2018, Saroya contacted Silicon Valley Community Foundation directly through the pseudonym "Ahmed Vali" about CAIR's use of the grant and requested that the foundation open a formal investigation into CAIR-National and its use of the grant funding.

  See October 18, 2018 email, attached hereto as Exhibit D.
  - 65. Unquestionably, Saroya's false accusations damaged CAIR's reputation.
- 66. Saroya's attempts to damage CAIR's relationship with its chapters and Solidarity Giving was only the first of many steps in Saroya's planned attack.

## Saroya Defames CAIR on Social Media and Public Websites

- 67. After learning of Saroya's false accusations regarding the grant funding, CAIR sent Saroya a cease and desist letter.
- 68. In response to and in retaliation for the cease and desist, Saroya started her internet defamation campaign and began continuously and systematically publishing false statements online accusing CAIR of criminal and civil misconduct.
- 69. Saroya's social media and internet smear campaign against CAIR takes several forms:
  - Saroya has published disparaging remarks about CAIR on her personal public
     Facebook page and the Facebook pages of several CAIR chapters, strategic
     partners, and donors;
  - b. Saroya has published disparaging remarks about CAIR on several internet "blogs" under her given and/or marital name as well as under several pseudonyms;
  - c. Saroya has published disparaging "comments" on online newspaper articles written about CAIR or quoting CAIR staff members; and

d. Saroya has created email and social media accounts under different names and is currently using those accounts to send disparaging publications about CAIR to CAIR partners and donors.

### Saroya's Public Facebook Harassment

- 70. With respect to Saroya's first form of harassment, Saroya published statements on her personal Facebook page and the Facebook pages of several partners and donors under the names "Lori Haidri-Saroya" and "Lori Haidri." The profile pictures for Lori Haidri-Saroya and Lori Haidri are identical. The owner and publisher of these two accounts is Saroya.
  - 71. Saroya's false accusations take many forms.
- 72. In one online post published in the fall of 2018, Saroya claimed that CAIR owed her "nearly \$30,000 in unpaid, wages, bonus, and reimbursements" post-employment:



73. At the time the above screenshot was captured, only four hours after Saroya published the statement, at least eight individuals had viewed it.

- 74. CAIR does not currently owe and did not owe Saroya \$30,000 in unpaid wages, bonuses, and reimbursements.
- 75. In fact, on October 31, 2020, Saroya filed a claim for these alleged "unpaid wages, bonus, and reimbursement" with the Washington D.C. Department of Employment Services. On February 8, 2021, the Department denied and dismissed Saroya's complaint in its entirety finding that Saroya "was paid for all hours worked during her tenure with [CAIR]" and that she was "not owed for any unpaid wages." See Washington, D.C. Department of Employment's Initial Determination, attached hereto as **Exhibit E**. With respect to Saroya's specific claim for 2016 2018 reimbursements, the Department found that "there is an email dated December 31, 2016 from [Saroya] that she would like her 2016 expense reimbursements classified as donations" and "there is no proof of [Saroya's] 2018 reimbursements actually being submitted to [CAIR]." Id.
- 76. CAIR did not owe Saroya "\$30,000 in unpaid wages, bonuses, and reimbursements" at the conclusion of her employment. At the time Saroya published the aforementioned statement, she knew it to be false or made it with reckless disregard for the truth or falsity of the statement.
- 77. Upon information and belief, Saroya made several posts in the summer and fall of 2018 claiming that CAIR owed her unpaid wages.
- 78. When CAIR continued to operate despite her reputational damage and harm, Saroya escalated her allegations and started accusing CAIR of discrimination, retaliation, sexual harassment, and creating a hostile work environment.

79. Specifically, in a separate Facebook publication, Saroya accused CAIR of "gender discrimination, religious discrimination, sexual harassment, retaliation, hostile work environment, union busting, financial mismanagement, lack of board oversight, and board incompetence..." and that CAIR owed her "over \$20,000."



#### Lori Haidri

CAIR has a pattern of discriminating against and mistreating their own employees, especially women. Donor funds are directly going to pay for attorneys to suppress, silence, and intimidate those who have been treated unjustly.

I was with CAIR for nearly 12 years in various roles: chapter founder, chapter executive director, national board member, and national chapter director. I witnessed gender and religious discrimination, sexual harassment, retaliation, hostile work environment, union busting, financial mismanagement, lack of board oversight, board incompetence, and other serious issues at CAIR. When I resigned, they asked me to sign a non-disparagement agreement. When I refused, they withheld my pay, bonus, and reimbursements. Today, CAIR owes me over \$20,000.

- 80. CAIR does not use attorneys to "suppress, silence, and intimate" its employees, nor does it engage in a pattern discriminating, harassing, or retaliating against its employees or mistreating them. CAIR merely sent Saroya a cease and desist after she emailed chapters falsely claiming that CAIR-National had mismanaged its grant funding.
- 81. At the time Saroya published these statements, she knew them to be false or made these statements with reckless disregard for their truth or falsity.

82. Intending to increase her audience, Saroya also began publishing statements on the public Facebook pages of various CAIR chapters. For example, in September 2018, Saroya accused CAIR-National of "dysfunction" and "abuse" and made similar accusations regarding her alleged unpaid wages in a statement that she published on CAIR-Sacramento Valley's public Facebook page:



Last year, I said goodbye to CAIR National and all their dysfunction and abuse- and resigned from my job as Chapter Director. It was the most empowering feeling- and I got a small glimpse into how people might feel when they finally end an abusive relationship, or get freed from prison, or leave a cult. But I should have known it was too good to be true. I wasn't really free from CAIR because they withheld my pay, bonus, and reimbursements. Today, they still owe me over \$20,000 in pay and reimbursements, plus attorney's fees. As you're considering which nonprofits to support and donate to, I want you to be diligent- do your research and ask the tough questions. Is your money really helping to empower people in the community who have been discriminated against, or are you empowering a toxic entity that has a pattern of discriminating against its own employees and further victimizing people who seek their help? Is your money going to pay an attorney to fight for people's rights to practice their faith or is your money going to pay an attorney to suppress, silence, and intimidate other Muslims who have been treated unjustly? Are you supporting legitimate, sincere advocates for justice or those who support the status quo and are spineless when the injustice is committed by their own national leaders?

- 83. At the time Saroya published the above statement, she knew the allegations contained therein were false or made with reckless disregard for their truth or falsity.
- 84. That same month, in a separate publication on one of her personal pages, Saroya again accused CAIR-National of being "mismanaged" and "ineffective," and falsely stated its leaders were "corrupt":



- 85. Aside from posting this statement on her personal Facebook page, she also posted it to the Facebook page of CAIR-Oklahoma's Executive Director.
- 86. CAIR-Oklahoma's Executive Director had to "block" Saroya from continuing to harass CAIR using his Facebook page.
- 87. At the time Saroya made the aforementioned statements, including that CAIR-National is "mismanaged, ineffective," and "corrupt," she knew them to be false or made them with reckless disregard for their truth or falsity.
- 88. In another posting published on or about September 30, 2018, Saroya falsely accused leaders of CAIR-National of being "perpetrators of injustice" and claimed that CAIR discriminated against, "directly harmed," and "abused" its employees:



Lori Haidri Chapters are very capable of standing up for justice, but they look the other way and do nothing when their national leaders are the perpetrators of injustice. That's hypocrisy.

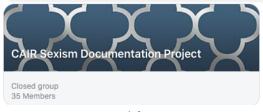
There are many people who have been directly harmed. The "CAIR Sexism Documentation Project" currently has 34 members, mostly women, who share their experiences of facing discrimination, and other abuses, by the nation's largest Muslim civil rights organization. https://www.facebook.com/groups/2228298364100050/

Employment discrimination lawsuit filed against CAIR-CA. SEE: https://www.docdroid.net/FjATdM9/onlinedocument.pdf...

This review was posted to CAIR-New Jersey on 9/23: "I do not recommend donating your money to CAIR-NJ. I believe there may be a warrant out for the arrest of a former CAIR-NJ. I board member, who served as this organization's treasurer, for stealing CAIR-NJ money by writing himself checks. Donors should definitely question whether their charity is legitimately being used to do civil rights advocacy, how this was allowed to happen, and whether the organization is being fully transparent. Full disclosure: I am a former Executive Director of CAIR-NJ and found the board leadership to be quite inadequate and corrupt at the expense of the community and even moreso at the expense of its staff."

I worked with CAIR in various capacities for 11 years, chapter founder, chapter executive director, national board member, and national chapter director and I'm convinced that CAIR creates more victims than it helps. It does more harm than good, whether it's the continuous negative portrayal of Muslims as victims in the media, lack of strategy, making serious mistakes on people's cases, providing inconsistent services, the all-male press conferences, failure to build a legitimate nationwide infrastructure, lack of community engagement on the national level, not having a seat at many tables despite being around for 25 years and having an office a few blocks from the US Capitol, and so much more.

Are you aware that there are at least THREE lawsuits in 2019 alone by former employees/board members? Chapters have a responsibility to step up and fix their organization. As civil rights activists, they should be on the frontlines of holding themselves accountable. The community deserves a legitimate civil rights and Islamic organization that treats all people with the respect and dignity they deserve.



- 89. At the time Saroya published the above statements, including the accusation that CAIR "abuse[d]" its employees (a criminal act), she knew them to be false or made them with reckless disregard for their truth or falsity.
- 90. Saroya's crusade to destroy CAIR's reputation in the community continued into 2019 as well. In or around February 2019, Saroya published the following statement on her public Facebook page again falsely claiming that CAIR owed her \$30,000 in unpaid wages, bonuses, and reimbursements:



91. At the time Saroya made the statement regarding her "unpaid wages," she knew it to be false or made it with reckless disregard for its truth or falsity.

# 92. On or about March 4 and 5, 2019, she published similar allegations on her public

# Facebook page:



Despite how challenging the past two years were, and the additional stress I experienced over the past 9 months trying to get my funds, a nagging question keeps coming up: If CAIR National can retaliate against me and treat me like this after I founded one of the strongest CAIR chapters, was a chapter executive director, served on the CAIR National board, was a senior staff member at CAIR National, and dedicated 11 years of my life and career to this organization- how do they treat other people? Did they also withhold wages, bonus, and reimbursements from other employees after they resigned- people who weren't in a position to lose their money, didn't know their legal rights, couldn't afford to hire an attorney, didn't know how to file with the EEOC or navigate the legal system, and just had too much to lose for speaking out? I fully recognize my privilege and my responsibility. Did I do what others (apart from the sincere people at CAIR-MN) are doing right now: look the other way while being fully aware of the dysfunction and incompetency at CAIR National?

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I don't usually tell people this, but one year before I joined as an employee, I was on the CAIR National board. Quite frankly, it's embarrassing, I wish I could say that the most incompetent thing they did was forget to ask me to sign a confidentiality agreement as a new board member, but it's worse. Much worse. In my opinion, the CAIR National board does not provide proper oversight and governance to the organization. I question board dynamics and authority when the founder and executive director is a voting member of the board- and has been for the past 25 years. This leads to a culture where people don't feel ownership/authority and simply look the other way. Did the CAIR National board look the other way when CAIR National lost its 501c3 status for not filing 990s over several consecutive years? Did the CAIR National board look the other way when there were allegations of illicit affairs and temporary marriages? Did the CAIR National board look the other way when questionable expenses and random donations appeared on the organization's financial statements? Did the CAIR National board look the other way when three years of CAIR National's financial statements allegedly disappeared? Did the CAIR National board look the other way when a former staff member allegedly reimbursed the organization financially long after his employment at CAIR National had ended? Did the CAIR National board look the other way when a board member literally fell asleep during several board meetings?

I'm contemplating two things: 1) Does CAIR create more victims than it helps? and 2) Does CAIR do more harm than good, whether it's the continuous negative portrayal of Muslims as victims in the media, lack of strategy, sometimes screwing up people's discrimination cases, providing inconsistent services, the all-male press conferences, failure to build a legitimate nationwide infrastructure (according to their website, they have executive directors in approximately 15 states), lack of community engagement on the national level, not having a seat at many tables despite being around for 25 years and having an office a few blocks from the US Capitol, and so much more. We deserve better as a community.



15 Comments

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- 93. Based on the number of "reactions" listed at the bottom of each of the March 2019 Facebook posts, at least thirty separate individuals viewed the allegations within 24 hours of them being published.
- 94. At the time Saroya published the now familiar accusations, she knew them to be false or made the statements with reckless disregard for their truth or falsity.

# Saroya Retains a Well-known Islamophobe to Represent Her in a Purported Lawsuit against CAIR

- 95. In or around July 2019, Saroya hired a well-known anti-Muslim and Islamophobic attorney to represent her.
  - 96. Specifically, on July 5, 2019, CAIR received a demand letter from Saroya's attorney.
- 97. The demand letter purported to be Ms. Saroya's attempts to resolve her wage grievances with CAIR.
- 98. Saroya (through counsel) threatened to move the United States Attorney General to classify CAIR as a foreign agent and to file a lawsuit against CAIR claiming that CAIR committed racketeering, wire-fraud, mail fraud, embezzlement, threats, blackmail, obtaining donations under threat, laundering of foreign funds, conspiracy with criminals, fraud against the United States, conspiracy with outlawed groups and violent individuals, and other criminal and terrorist acts.
- 99. Saroya's demand letter also included a threat by her attorney to file a racketeering complaint he previously drafted against CAIR, which was attached to Saroya's demand letter. That complaint claimed that CAIR: (1) is working in concert with Hamas, the Muslim Brotherhood and various terror groups and individuals "in an association-in-fact enterprise" that promotes terror; (2) raises "money for ostensible civil rights activities... when in fact the self-proclaimed [sic] charity is designed to promote the terror agenda of Hamas;" (3) is involved in a

"conspiracy that violated the rights of Jews and Christians by targeting them for economic harm, murder, and other harms due to their religion"; (4) is illegally acting as a foreign agent and concealing funding from overseas in violation of its tax exempt status; (5) is part of a "conspiracy that intends to eliminate the United States Constitution and replace it with Sharia law;" and (6) is raising money to support a violent jihad, among a host of other harmful and false accusations of criminal conduct.

- 100. Saroya's attorney concluded his letter by demanding several hundred thousands of dollars on Saroya's behalf.
  - 101. CAIR did not acquiesce to what it perceived as an extortion attempt.

# Saroya Continues Forward on Her Mission to Damage CAIR

- 102. Saroya continued to disseminate her publications to a wide audience in 2019. In September and October 2019, she published statements on public Facebook pages falsely accusing CAIR of discriminating against and mistreating its employees, and reiterating her lie about being owed \$20,000.
  - 103. In October 2019, Saroya stated the following:



#### ori Haidri

I was with #CAIR for nearly 12 years in various roles: chapter founder, chapter executive director, national board member, and national chapter director. I witnessed gender and religious discrimination, sexual harassment, retaliation, hostile work environment, union busting, financial mismanagement, lack of board oversight, board incompetence, and other serious issues at CAIR. When I resigned, they asked me to sign a non-disparagement agreement. When I refused, they withheld my pay, bonus, and reimbursements. Today, CAIR owes me over \$20,000.

They have a pattern of discriminating and mistreating their own employees, especially women. Donor funds are directly going to pay for attorneys to suppress, silence, and intimidate those who have been treated unjustly.

There are many people who have been directly harmed by CAIR. The "CAIR Sexism Documentation Project" currently has 35 members, mostly women, who share their experiences of facing discrimination, and other abuses, by the nation's largest Muslim civil rights organization.

Chapters are very capable of standing up for justice, but they look the other way and do nothing when their national leaders are the perpetrators of injustice.

Ultimately, nothing good can come out of corruption and injustice. The community deserves a legitimate civil rights and Muslim organization that treats all people with the respect and dignity they deserve. #CAIRSnapshots

8 hrs Like Reply More

- 104. CAIR did not engage in a pattern of discriminating and mistreating its own employees. It does not "suppress, silence, or intimidate" its employees.
- 105. At the time Saroya made these statements, among others, she knew them to be false or made them with reckless disregard for their truth or falsity.
- 106. As demonstrated by the communication above, Saroya often employed the use of hashtags (#) to ensure that, if the public ever searched for "CAIR" or "CAIRSnapshots" within the Facebook platform, her disparaging remarks would be included as a search hit.
- 107. In October 2019, Saroya published another defamatory statement on CAIR's event page promoting its 25<sup>th</sup> Annual Gala, stating in part:

Last year, I said goodbye to CAIR National and all their dysfunction and abuseand resigned from my job as Chapter Director. It was the most empowering feeling- and I got a small glimpse into how people might feel when they finally end an abusive relationship, or get freed from prison, or leave a cult. But I should have known it was too good to be true. I wasn't really free from CAIR because they withheld my pay, bonus, and reimbursements. Today, they still owe me over \$20,000 in pay and reimbursements, plus attorney's fees.

...

There are many people who have been directly harmed. The "CAIR Sexism Documentation Project" currently has 35 members, mostly women, who share their experiences of facing discrimination, and other abuses, by the nation's largest Muslim civil rights organization.

https://www.facebook.com/groups/2228298364100050/ Employment discrimination lawsuit filed against CAIR-CA. SEE:

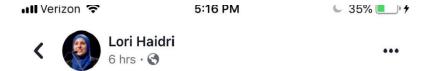
https://www.docdroid.net/FjATdM9/onlinedocument.pdf?fbclid=IwAR3kblVLDu8oXfJi23uudSNdl10\_b9nlYmbLFptZPvyaYYSyd\_s5OCddSVg

. . .

I worked with CAIR in various capacities for 11 years, chapter founder, chapter executive director, national board member, and national chapter director and I'm convinced that CAIR creates more victims than it helps. It does more harm than good, whether it's the continuous negative portrayal of Muslims as victims in the media, lack of strategy, making serious mistakes on people's cases, providing inconsistent services, the all-male press conferences, failure to build a legitimate nationwide infrastructure, lack of community engagement on the national level, not having a seat at many tables despite being around for 25 years and having an office a few blocks from the US Capitol, and so much more.

See Saroya's full publication, attached hereto as Exhibit F.

- 108. At the time Saroya made the above statement, with her now copy and paste defamatory allegations, she knew her publication was false or made it with reckless disregard for its truth or falsity.
- 109. Saroya continued to claim that "[d]onor funds are directly going to pay for attorneys to suppress, silence, and intimidate those who have been treated unjustly":



Don't donate to CAIR (Council on American-Islamic Relations). #CAIR has a pattern of #discriminating against and mistreating their own employees, especially #women. Donor funds are directly going to pay for attorneys to suppress, silence, and intimidate those who have been treated unjustly.

I was with CAIR for nearly 12 years in various roles: chapter founder, chapter executive director, national board member, and national chapter director. I witnessed gender and religious discrimination, sexual harassment, retaliation, hostile work environment, union busting, financial mismanagement, lack of board oversight, board incompetence, and other serious issues at CAIR. When I resigned, they asked me to sign a non-disparagement agreement. When I refused, they withheld my pay, bonus, and reimbursements. Today, CAIR owes me over \$20,000.

There are many people who have been directly harmed by CAIR. The CAIR Sexism Documentation Project currently has 35 members, mostly women, who share their experiences of facing discrimination, and other abuses, by the nation's largest Muslim civil rights organization. https://www.facebook.com/groups/2228298364100050/

There are at least THREE lawsuits in 2019 alone by former employees/board members. Employment discrimination lawsuit filed against CAIR-CA. SEE:

https://www.docdroid.net/FjATdM9/onlinedocument.pdf?

110. At the time Saroya published the aforementioned statement, she knew it to be false or made it with reckless disregard for its truth or falsity.

# Saroya Publishes Defamatory Statements as Comments to Online Newspaper Articles

- 111. Aside from her Facebook bullying campaign, Saroya also began publishing defamatory material as "comments" to various internet articles that mentioned CAIR's work in the Muslim community.
  - 112. A history of her online "comments" can be found on her personal "Disqus" website.
- 113. "Disqus" is a blog comment hosting service. Saroya's username for the Disqus site is "LS," her initials. Her "profile" picture on the Disqus website is the same picture that she uses on her personal Facebook page. The profile picture is of Saroya.
- 114. As of March 22, 2021, Saroya's Disqus website shows that she posted defamatory comments on at least seven different internet articles reporting on CAIR's activities, Muslim-American relations, and international affairs. See Saroya's Disqus blog and corresponding internet comments, attached hereto as **Exhibit G**.
- 115. At least five of these comments were posted to articles that were published from January 2020 March 2020.
- 116. As an example of her obsessive misconduct, in a comment to an article published on January 28, 2020, Saroya stated that "CAIR creates more victims than it helps. It does more harm than good, whether it's the continuous negative portrayal of Muslims as victims in the media, lack of strategy, making serious mistakes on people's [legal] cases, providing inconsistent services...." See Local immigration advocates speak on SCOTUS 'public charge' ruling, January 28, 2020, WBFO NPR, attached hereto as **Exhibit G.1**.

- 117. CAIR does not continuously portray Muslims negatively in the community; nor does it "mak[e] serious mistakes" on its clients' legal matters.
- 118. At the time Saroya published the above statement, she knew it was false or made it with reckless disregard for its truth or falsity.
- 119. In a comment to an article published February 21, 2020, Saroya also accused CAIR of accepting "international funding through their Washington Trust Foundation," implying that CAIR is funded by foreign governments or terrorist organizations. See Muslim advocates demand Bloomberg apologize for NYPD spying program, February 21, 2020, Religious News Network, attached hereto as Exhibit G.2.
  - 120. CAIR does not accept funding from terrorist organizations.
- 121. At the time Saroya published the statement, she knew it was false or made it with reckless disregard for its truth or falsity.
- 122. In a comment to an article published on March 3, 2020, Saroya stated that CAIR was an "incompetent and toxic organization," that engaged in "sexual abuse and exploitation," and "financial abuse and mismanagement." See Chu, Murphy, Feinstein, and Neguse lead effort to block President Trump's expanded 'Muslim ban,' March 3, 2020, City News Service, attached hereto as **Exhibit G.3**. The comment has since been deleted from website.
- 123. CAIR does not engage in systemic gender discrimination, "sexual abuse and exploitation," or "financial abuse and mismanagement."
- 124. In fact, women play a critical role at CAIR. Specifically, CAIR's National Board Chair, Chief Operating Officer, General Counsel and National Litigation & Civil Rights

  Director, Human Resources Director, Controller, and Chapter Relations Manager are all women.

  In fact, more than two thirds of CAIR-National's staff are managed by women. Additionally, a

recent diversity survey indicated that women hold more than half of CAIR affiliate positions nationwide.

125. At the time Saroya published the above statements, she knew they were false or made them with reckless disregard for their truth or falsity.

# Saroya Sends Targeted Defamatory Publications to CAIR's Partners, Donors, and Religious Leaders

- 126. Perhaps not seeing the result she wanted a total destruction of CAIR Saroya's defamatory conduct appeared to intensify in 2020 when she began sending targeted email communications to CAIR's partners, donors, and religious leaders.
- 127. In or around January 2020, Saroya contacted a religious leader who was serving as Executive Director of "As the Spirit Moves Us" in Portland, Oregon. The religious leader was scheduled to speak at an upcoming CAIR-Oregon event.
- 128. In an attempt to interfere with CAIR and CAIR-Oregon's advancement and development efforts, Saroya sent the following message (in part) to the religious leader via Facebook:

CAIR Council on American-Islamic Relations has a pattern of discriminating against and mistreating their own employees, especially #women.

There are issues of religious #discrimination, sexual #harassment, #retaliation, #hostile work environment, #union busting, financial #mismanagement, lack of board oversight, board #incompetence, and other serious issues at CAIR. Donor funds are directly going to pay for attorneys to suppress, silence, and intimidate those who have been treated unjustly.

There are many people who have been directly harmed by #CAIR. The CAIR Sexism Documentation Project currently has 35 members, mostly women, who share their experiences of facing discrimination, and other abuses, by the nation's largest Muslim civil rights organization.

https://www.facebook.com/groups/2228298364100050/

. . .

Some of the local funds that chapters raise goes directly to National as part of chapter

affiliation fees. And when you are the national founder, national board member with no term limits, and national executive director, you have immense power on how that money is spent- including buying yourself a brand new SUV, paying expensive DC lawyers to shut down staff efforts to unionize, hiring attorneys to harass and intimidate women who ask for equal pay and report abuse and sexual harassment, etc. Chapters are aware of the issues but look the other way and do nothing.

. . .

CAIR creates more victims than it helps. It does more harm than good, whether it's the continuous negative portrayal of Muslims as victims in the media, lack of strategy, making serious mistakes on people's cases, providing inconsistent services, the all-male press conferences, failure to build a legitimate nationwide infrastructure, lack of community engagement on the national level, not having a seat at many tables despite being around for 25 years and having an office a few blocks from the US Capitol, and so much more.

Ultimately, nothing good can come out of corruption and injustice. The community deserves a legitimate civil rights and Muslim organization that treats all people with the respect and dignity they deserve.

See Saroya's January 2020 email to religious leader, attached hereto as Exhibit H.

- 129. Upon information and belief, Saroya sent similar disparaging messages to other attendees of the CAIR-Oregon event.
- 130. In addition to interfering with CAIR-Oregon's development efforts, Saroya contacted donors of CAIR-Oklahoma around this same time and accused CAIR of the same above-described conduct.
- 131. In or around March 2020, Soraya published her defamatory statements on the founder of the Maryland Commission on Civil Rights' Facebook page. The Maryland Commission on Civil Rights and CAIR have partnered together to provide trainings about religious accommodations for Muslims in the workplace. Saroya titled the message "Your partnership with CAIR is troubling" and stated the following, in part:

CAIR has serious issues of religious and gender discrimination, sexual abuse and exploitation, retaliation, union busting, hostile work environment, financial abuse and mismanagement- including losing their 501c3 and issues with their

Washington Trust Foundation entity receiving international donations-board incompetence, tokenism, and more.

CAIR does more harm than good, whether it's the continuous negative portrayal of Muslims as victims in the media, lack of strategy, making serious mistakes on people's cases, the all-male press conferences, providing inconsistent services, lack of transparency around international funding sources and agendas, the embarrassing media spokespeople, failure to build a legitimate nationwide infrastructure, being a laughing stock on Capitol Hill despite having an office a few blocks from the U.S. Capitol, lack of community engagement on the national level, and, after 26 years, not having a seat at MANY tables (including the Leadership Conference on Civil and Human Rights, which brings together 200+national civil rights organizations).

CAIR Sexism Documentation Project https://www.facebook.com/groups/2228298364100050/

. . . .

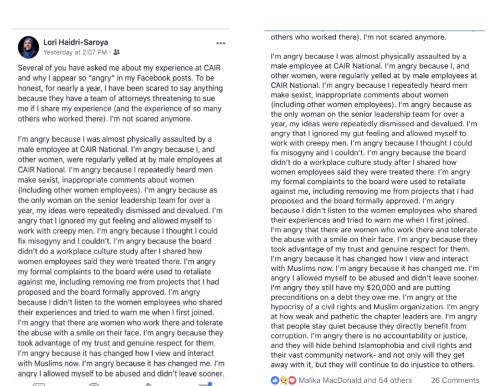
As you're considering which nonprofits to support and donate to, please be diligent- do your research and ask the tough questions. Is your money really helping to empower people in the community who have been discriminated against, or are you empowering a multi-million dollar organization that discriminates against its own community and further victimizes people who seek their help? Is your money going to pay an attorney to fight for people's rights to practice their faith or is your money going to pay an attorney to suppress, silence, and intimidate those who have been treated unjustly? Are you supporting legitimate, sincere advocates for justice or those who support the status quo and cowardly look the other way when the injustice is committed by their own national leaders?

#CAIR is a corrupt and unethical organization that does not speak for American Muslims. A true civil rights organization would treat all people with the respect and dignity they deserve.

See March 2020 Facebook message to the Maryland Commission on Human Rights, attached hereto as **Exhibit I**.

132. In June 2020, she published similar sentiments on the public Facebook page of another one of CAIR's partners, JetPac.

- 133. JetPac is a non-profit organization aimed at giving American Muslim organizers, candidates, and communities the tools and training they need to increase civil engagement and public service.
- 134. In her publication, Saroya accused CAIR-National of discrimination, retaliation, and physically threatening conduct:



- 135. Based on the number of reactions Saroya's inciting accusations garnered at the time the screen shot was taken, at least fifty-five individuals had viewed the defamatory material within approximately 24 hours of its publication.
- 136. Upon information and belief, Saroya used Facebook to send similar defamatory communications to dozens of CAIR's religious and non-profit partners.

- 137. At the time Saroya made these accusations, including these specific communications outlined above, she knew them to be false or acted with reckless disregard to their truth or falsity.
- 138. Her conduct was designed to permanently sever CAIR's relationship with these organizations while Saroya was developing her own donor dependent organization.

Saroya Misappropriates CAIR's Confidential Information and Sends Defamatory Publications to CAIR's Partners, Donors, and Religious Leaders Anonymously, but her True Identity is Clear

- 139. Upon information and belief, Saroya confiscated CAIR's Confidential Information, specifically information related to its donors and supporters.
- 140. Saroya used and is continuing to use that Confidential Information to contact the individual representatives for CAIR's donors and supporters to publish her defamatory diatribe and tortiously interfere with CAIR's contracts and business relations.
- 141. In recent months, Saroya has become more cautious about her attacks. She has stopped using and completely deleted and/or "deactivated" her personal Facebook page, and is now hiding behind a "secret identity."
- 142. In or around October 2020, Saroya began sending her repetitious creed to CAIR's partners, donors, and religious leaders anonymously via the email address "muslimsdocumentingsexism@gmail.com."
- 143. Upon information and belief, Saroya controls the "Muslims Documenting Sexism" account and is using the account to continue her harassment and defamation campaign against CAIR anonymously and encourage CAIR's peers to discontinue their business partnerships with the organization.

- 144. Specifically, on October 24, 2020, "Muslims Documenting Sexism" sent an email to a representative of CAIR's partner organization, the National Affiliate of Muslim Lawyers.
- 145. Saroya obtained the representative's email address through the misappropriated CAIR Confidential Information.
- 146. The email publication is nearly identical to the content of Saroya's many emails, internet comments, and Facebook posts. The email states:

From: Muslims Documenting Sexism <muslimsdocumenting@gmail.com>

Sent: Saturday, October 24, 2020 8:32 PM

To: <[REDACTED]>

Subject: Important- your partnership with CAIR

Hello,

Please don't partner with the Council on American-Islamic Relations (CAIR) or their chapters. We urge you to investigate these allegations.

We have documented a pattern of discrimination and abuse inside CAIR www.cair.com. These incidents were brought to the attention of CAIR's leadership and the National Council, a national entity made up of leaders from every chapter. Instead of investigating the issues and taking serious steps to remedy them, CAIR has threatened legal action against those who speak out. This further victimizes and silences individuals.

Over 35 former employees and board members have alleged numerous issues inside CAIR, including:

- Sexual harassment, abuse, and exploitation
- Gender discrimination
- Religious discrimination (Jewish, Shia Muslim, & Christian employees)
- Retaliation; hostile work environment
- Interference with staff efforts to unionize/union busting
- Tokenism
- Board incompetence and lack of board oversight
- Financial abuse and mismanagement

There are many people who have been directly harmed by CAIR. The CAIR Sexism Documentation Project is a support group for women, and a few men, to share their experience at CAIR.

Despite efforts to intimidate and silence women, there have been several lawsuits against CAIR. In 2019, an employment discrimination lawsuit was filed against CAIR-California for gender discrimination. This case was settled and the CAIR-San Diego executive director is no longer employed there. SEE:

https://www.docdroid.net/FjATdM9/onlinedocument.pdf?fbclid=lwAR1uMMCaznSystm ODEn10py3 qHMJsye9r4fkLKCYyecJ4dYzKVIWbbrVGI

Many believe that the CAIR board does not provide proper oversight to the organization. CAIR's national founder is also the full-time paid executive director and a voting board member. He has allegedly been a voting board member for 25+ years and does not have a term limit.

The lack of board oversight has led to some serious issues inside CAIR:

- Lost 501c3 nonprofit status for not filing 990s over several consecutive years
- A former accountant stole funds and it took him over 10 years to reimburse the organization
- Brand new SUV and monthly insurance payments for the executive director/founder/board member
- CAIR is missing three years of financial statements, there are allegations that it was destroyed intentionally
- Lack of transparency around CAIR's Washington Trust Foundation (WTF) entity receiving international donations that are funneled to CAIR. WTF allegedly owns CAIR's multimillion dollar building on Capitol Hill in Washington, DC. CAIR's executive director/founder/board member signed 990s for both CAIR and WTF and is allegedly paid by both entities.

A prominent Muslim community leader, and former CAIR-New Jersey executive director, shared his experience at CAIR: "I do not recommend donating your money to CAIR-NJ. I believe there may be a warrant out for the arrest of a former CAIR-NJ board member, who served as this organization's treasurer, for stealing CAIR-NJ money by writing himself checks. Donors should definitely question whether their charity is legitimately being used to do civil rights advocacy, how this was allowed to happen, and whether the organization is being fully transparent. Full disclosure: I am a former Executive Director of CAIR-NJ and found the board leadership to be quite inadequate and corrupt at the

expense of the community and even moreso at the expense of its staff."

SEE: https://www.facebook.com/pg/CAIRNewJersey/reviews/?ref=page\_internal

From 2016-2018, CAIR spent hundreds of thousands of dollars on attorney's fees to shut down staff efforts to unionize. No staff vote to unionize took place. All 7 employees who were leading the effort to unionize were either terminated or resigned. CAIR got away with union busting because the NLRB ruled that CAIR is a religious organization. Is CAIR really a religious organization or a civil rights organization?

Unfortunately, CAIR does more harm than good, whether it's the continuous negative portrayal of Muslims as victims in the media, lack of strategy, making serious mistakes on people's cases, the Muslim Ban lawsuit fiasco, the all-male press conferences, refusal to stand up for civil rights for all, lack of transparency around international funding sources and agendas, the embarrassing media spokespeople, failure to build a legitimate nationwide infrastructure, the one-person departments and offices, lack of influence on Capitol Hill despite having an office a few blocks from the U.S. Capitol, lack of community engagement nationally, and, after 26 years, not having a seat at MANY tables- including the Leadership Conference on Civil and Human Rights, which brings together 200+ national civil rights organizations. CAIR needs to stop hiding behind Islamophobia and get its act together.

Please be diligent- do your research and ask the tough questions. Is the community really helping to empower people who have been discriminated against, or are they empowering a multi-million dollar organization that discriminates against its own community and further victimizes people who seek their help? Are their donations going to pay an attorney to fight for people's rights to practice their faith or are they instead paying an attorney to suppress, silence, and intimidate other Muslims (CAIR employees) who have been treated unjustly? Are they supporting competent and principled advocates for justice or those who support the status quo and look the other way when the civil rights abuse is taking place inside their own organization?

Due to personal safety concerns and legal threats from CAIR's attorneys, our group members need to remain anonymous. Thank you for your understanding. We trust that you will do a thorough investigation into these allegations.

- 147. At the time Saroya published the diatribe to the representative, she knew the allegations contained therein were false or made them with reckless disregard for their truth or falsity.
- 148. To be clear, the alleged thirty-five victims of sexual harassment have not asserted any allegations to CAIR-National. CAIR-National has made several attempts to learn the identities of the alleged women so that it could investigate the alleged misconduct and take corrective

action immediately if necessary. CAIR has even hired an outside law firm to investigate the Facebook group's claims.

- 149. The group, however, is "closed," meaning that no member of CAIR or even the general public can enter into the group and determine that it is what it purports to be.
- 150. No complaints of systemic discrimination/harassment/retaliation were filed with CAIR-National.
- 151. Pursuant to CAIR's policies, any allegation or formal complaint made from an affiliate chapter staff or board member about another affiliate chapter staff or board member should have been reported to CAIR's Compliance Director.
- 152. If such a complaint was made to CAIR's Compliance Director, the Director would have opened a case and collected information regarding the allegations. Thereafter, the appropriate individual(s) at the relevant CAIR chapter, depending on the nature of the complaint, would have been notified of the information and of their duty to conduct an investigation rooted in CAIR's best practices. CAIR would have provided a determined window of time to conduct the investigation and report back to CAIR. If an appropriate investigation did not take place, CAIR would have the opportunity to sanction the chapter.
- 153. Saroya's statement that CAIR was "aware of a pattern of discrimination and abuse inside CAIR" and did nothing to investigate the allegations, was false. As a long-time employee of CAIR and board member, she knew the statement was false at the time she made it.
- 154. Upon information and belief, Saroya has used the Muslims Documenting Sexism Gmail address to send dozens, if not hundreds, of similar emails to other CAIR supporters and donors. Saroya obtained CAIR partners' and donors' identities and email addresses through her misappropriated CAIR Confidential Information.

- 155. Specifically, Saroya sent near identical communications to CAIR's partners and donors using the "Muslims Documenting Sexism" Gmail on the following occasions:
  - a. October 5, 2020, to a Maryland mosque leader. In the introduction to Saroya's well-known attack, she stated:

Please, please don't partner with the Council on American-Islamic Relations (CAIR) or their chapters. We have documented a pattern of discrimination and abuse inside CAIR. These incidents were brought to the attention of CAIR's leadership and the National Council, a national entity made up of leaders from each chapter. Instead of investigating the issues and taking serious steps to remedy them, CAIR has threatened legal action to those who speak out publicly. This further victimizes and silences individuals.

See October 5, 2020 to Maryland mosque, attached hereto as Exhibit J.

- b. October 5, 2020, Saroya sent the same email referenced above to the *Pacific Northwest Family Circle* ("PNWFC"), a community action group in Oregon that partners with CAIR. See October 5, 2020 correspondence to PNWFC, attached hereto as Exhibit K.
- c. November 4, 2020, to Count Every Vote Maryland. In the introduction to the diatribe, Saroya urges the organization not to include CAIR at a speaking engagement after the organization announced CAIR's inclusion. See November 4, 2020 correspondence to Count Every Vote Maryland, attached hereto as Exhibit L. Saroya intended the communication to damage CAIR's relationship with Count Every Vote Maryland.
- d. November 9, 2020, to members of the Executive Committee and multiple partners at Graydon Law. CAIR's Board of Director Chair, Roula Allouch ("Allouch"), is also an attorney at Graydon Law. See November 9, 2020 correspondence to Graydon Law, attached hereto as **Exhibit M**. Upon information and belief,

Saroya sent similar communications multiple Graydon Law attorneys. Saroya intended the communication to damage Allouch's employment at her firm.

Saroya also sent similar communications to organizations that Allouch volunteers with as well.

- e. November 14, 2020 to the *Florida Counsel on Churches*. In the introduction to the diatribe, Saroya states "please, please don't partner with [CAIR]." <u>See</u>

  November 14, 2020 correspondence to *Florida Counsel on Churches*, attached hereto as **Exhibit N.** Saroya intended the communication to sever CAIR's relationship with its religious partner.
- f. December 18, 2020, to CAIR's coalition partner *Indivisible*. *Indivisible* is Maryland advocacy group focused on combating racism in the community. In the introduction to the regular allegations, Saroya stated the following:

You are doing important work and this is a very important topic. We want to bring this information to your attention concerning your partnership with the Council on American Islamic Relations (CAIR). CAIR does not speak for American Muslims and many will tell you that they only show up for the media. They are good at sending press releases and jumping on current events, but this does not translate into actual work and credibility in the community. We don't trust them to provide accurate information. For example, if you look at the national office's annual civil rights report, the number of reported hate crimes and discrimination cases in each state will sometimes differ than what the CAIR state office reports in their local annual report. We don't know if this is a result of exaggeration, mismanagement, or miscommunication. What we do know is that there are trust, credibility, accuracy, and fairness issues when it comes to quoting CAIR in the media as a legitimate source or partnering with them. We urge you to investigate the serious allegations below.

See December 18, 2020 correspondence to *Indivisible*, attached hereto as **Exhibit O**.

- 156. Saroya continues her attack to this day.
- 157. On April 29, 2021, Saroya sent the same email correspondence to the co-founder and CEO of the *Academy of Muslim Achievement*. See April 29, 2021 correspondence to *Academy of Muslim Achievement*, attached hereto as **Exhibit P.** Saroya began the publication with, "[p]lease don't provide the Council on American Islamic Relations (CAIR) and their chapters publicity and partnership." <u>Id</u>.
- 158. Each of these email communications, sent to the individual representatives of CAIR's partners, donors, and religious leaders, of which there are numerous, repeats the same lies as those contained on her previous public Facebook posts.
- 159. Saroya used CAIR's Confidential Information to obtain the personal email addresses for representatives of these various organizations and published the defamatory diatribe to an unknown amount of CAIR's partners, donors, and religious leaders.
- 160. At the time Saroya published the communications, she knew the allegations contained therein were false or she made the allegations with reckless disregard for their truth or falsity.
- 161. The publications were clearly made to sever the ties between CAIR and its partners, a result that would cripple CAIR's ability to effectively fundraise and carry out its mission.

#### **Misconduct Continues to Harm CAIR**

- 162. As a result of Saroya's statements, CAIR has lost multiple partners, donors, and religious leaders.
  - 163. The loss of its donors has led to a significant decrease in its funding.

- 164. Additionally, Saroya's statements are now being used by Islamophobic, extremist organizations to perpetuate continued hate against Muslims in America.
- 165. For example, Saroya's diatribe was republished by "Bare Naked Islam" on October 27, 2019, in an article titled "Why did more than 120 members of Congress send congratulations letters to designated terrorist group CAIR on its 25<sup>th</sup> anniversary?" See Bare Naked Islam article, attached hereto as **Exhibit Q**.

#### **CAUSES OF ACTION**

#### **Count I: Defamation**

- 166. CAIR restates and re-alleges every allegation contained in the preceding paragraphs as if set for fully herein.
- 167. In Minnesota, defamation consists of four elements: (1) the defendant made a false and defamatory statement about the plaintiff; (2) the statement was an unprivileged publication to a third party; (3) the statement had a tendency to harm plaintiff's reputation in the community; and (4) the defendant was at fault.
- 168. Between May 2018 and the date of this filing, as documented in this complaint, Saroya made false and defamatory statements regarding CAIR on many occasions.
- 169. She accused CAIR of, *inter alia*, failing to pay her wages, committing systemic abuses against its employees, failing to investigate claims of abuse, committing financial misconduct, and other business torts.
  - 170. The statements were not privileged.
- 171. Saroya made the statements on her public Facebook page, CAIR chapter public Facebook pages, and the Facebook pages of individual CAIR partners, donors, and affiliates.

- 172. The statements were also made on online newspaper articles, available to the general public.
- 173. Saroya used "hashtags" to make sure that when the general public searched for CAIR, her false allegations would come up a search "hit."
- 174. She published her allegations online over and over and over again intending for the allegations to be widely disseminated and repeated.
- 175. She also targeted CAIR's donors to ensure that they would view the false allegations if her public attack failed to reach them.
- 176. Saroya's statements clearly identified CAIR and it was apparent on its face to those who read the statements that Saroya's defamatory statements were about CAIR.
  - 177. At the time Saroya made these allegations, she knew they were false.
- 178. When she had no direct or indirect connection to the miscellaneous allegations she lodged (i.e.; union busting, financial mismanagement, sexual abuse and exploitation, financial exploitation, systemic discrimination/harassment), then Saroya acted in reckless disregard of the truth or falsity of her statements because she had no way of knowing whether the incidents she discussed occurred.
  - 179. Saroya chose to defame and disparage CAIR to a world-wide audience.
- 180. By continuously attacking CAIR with false allegations on different internet fronts, Saroya acted with actual malice.
- 181. Saroya's false statements harmed CAIR's reputation in the community, subjecting it to hatred and contempt and discouraged its partners, donors, and religious leaders from associating with and donating to CAIR.

182. As a result, CAIR has suffered and will continue to suffer harm in an amount to be proven at trial that exceeds \$75,000.

#### **Count II: Defamation Per Se**

- 183. CAIR restates and re-alleges every allegation contained in the preceding paragraphs as if set for fully herein.
- 184. The prima facie elements for a defamation per se claim are nearly identical to a defamation claim, except that harm is not a required element of proof because harm from the statement is presumed. Harm is presumed in instances where a statement concerns a person's or organization's business, trade, or professional conduct. Harm is also presumed in instances where a statement accuses a person or organization of committing a crime.
- 185. Saroya's publications include false accusations that CAIR committed a crime: e.g., "sexual abuse and exploitation" and "financial exploitation."
- 186. Saroya's publications include false statements about CAIR's business and professional misconduct.
- 187. Because Saroya's statements accuse CAIR of committing criminal and professional misconduct, Saroya's publications are defamatory per se.

#### **Count III: Tortious Interference with Business Relationships**

- 188. CAIR restates and re-alleges every allegation contained in the preceding paragraphs as if set for fully herein.
- 189. To establish a claim of tortious interference with prospective business relationships, the plaintiff must prove that the defendant intentionally and improperly induced a third party not to enter into or continue a business relationship.

- 190. Saroya intentionally and improperly interfered with CAIR's prospective business relationships by using her defamatory communications to induce CAIR's partners, donors, and religious leaders identified above to discontinue their existing relationships with CAIR.
- 191. Saroya used CAIR's Confidential Information to target her defamatory communications to individuals and organizations that Saroya knew were a part of CAIR's fundraising and outreach efforts.
- 192. In those communications, she specifically asked those organizations to discontinue their relationships with CAIR.
- 193. As a result of Saroya's actions, CAIR has suffered and will continue to suffer damages in an amount to be proven at trial that exceeds \$75,000.

#### **Count IV: Breach of Contract**

- 194. CAIR restates and re-alleges every allegation contained in the preceding paragraphs as if set for fully herein.
- 195. To establish a prima facie breach of contract claim, the plaintiff must prove: (1) formation of a contract; (2) performance by plaintiff; and (3) breach by the defendant.
- 196. Saroya entered into a valid and enforceable agreement with CAIR as a condition of her employment at CAIR-National.
- 197. Pursuant to her *Agreement*, Saroya agreed to maintain the confidentiality of CAIR's Confidential Information, which included its partner/donor identities. She also agreed not to use the Confidential Information for any purpose other than at the request of CAIR and to return the Confidential Information at the conclusion of her employment.

- 198. Saroya breached her contractual obligations by retaining CAIR's Confidential Information post-employment and using that Confidential Information to send targeted defamatory communications to CAIR's donors.
- 199. As a direct result of Saroya's actions, CAIR has suffered and will continue to suffer damages in an amount to be proven at trial that exceeds \$75,000.

### **COUNT V: Injunctive Relief**

- 200. CAIR restates and re-alleges every allegation contained in the preceding paragraphs as if set for fully herein.
- 201. Saroya's systemic attack against CAIR and its mission began in 2018 and continues to this day.
- 202. The reputational harm is so severe that mere monetary damages alone cannot adequately remedy the injury CAIR has suffered and continues to suffer.
  - 203. To make CAIR whole, Saroya must be ordered to:
    - a. remove all defamatory social media publications made by Saroya under her given name or any of her pseudonyms;
    - b. issue a retraction for all defamatory publications;
    - c. cease and desist from any further defamation of CAIR in any form on any platform; and
    - d. return to CAIR all Confidential Information in her possession, custody, and control.

## **PRAYER FOR RELIEF**

WHEREFORE, CAIR respectfully requests the Court issue the following relief:

- 1. Compensatory damages in an amount to be proven at trial;
- 2. Injunctive relief as outlined above;
- 3. Pre-judgment and post-judgment interest;
- 4. Attorney's fees and cost of suit; and
- 5. For such other and further relief as the Court may deem just and proper.

#### **DEMAND FOR TRIAL BY JURY**

CAIR demands a trial by jury on all causes so triable.

This the 22nd day of May, 2021

Respectfully submitted,

Carl E. Christensen, Esq.

CHRISTENSEN LAW OFFICE PLLC

800 Washington Avenue North

Suite 704

Minneapolis, MN 55401

Counsel for Plaintiff

Council on American-Islamic Relations

OF COUNSEL

RUBIN FORTUNATO & HARBISON PC

Michael J. Fortunato, Esq.

pro hac vice requested

Cynthia B. Morgan, Esq.

pro hac vice requested

10 South Leopard Road

Paoli, Pennsylvania 19301

(610) 408-2005/2022

mfortunato@rubinfortunato.com

cmorgan@rubinfortunato.com

## **EXHIBIT "A"**

## Lori Saroya

Cultivating Inclusivity

"Because everyone deserves to be treated with respect and dignity."

#### Diversity Trainer, Civil Rights Activist, Nonprofit Leader

Lori Saroya grew up in a small town in southern lows, where her immigrant family often faced acts of bias and bigotry. She brings a deep, personal commitment and passion for empowering under-served communities and reasting a just, equitable society. She has spent her entire career working to ensure that everyone is treated with the respect and dignity they deserve

Lori is committed to service and community. She serves on the Blaine Charter Commission and previously served on the Minnesota Judicial Branch Committee for Equality and Justice, St. Paul Human Rights and Equal Economic Opportunity Commission, Minnesota Council of Nonprofits Board of Directors, and the Alumni Board of Mitchell Hamilher School of I aw





Lori is the co-founder of a new, groundbreaking organization, the American Muslim Civil Rights Center. Its mission is: Cultivating inclusivity, creating dialogue, and empowering communities to learn, grow and succeed together.

The American Muslim Civil Rights Center is the nation's first Muslim civil rights museum & memorial. It provides a historical context to civil rights in America, documents civil rights issues facing American Muslims, and offers programming such as guest speakers and the Empathy & Education Project. Lori is taking the lead in creating opportunities for people to come together for dialogue and education. Juring a time when there is so much fear and division in our nation.

In 2007, Lori identified a need in the community and founded a legal services nonprofit organization that assists Minnesotans experiencing reads. Irregions, and ethnic discrimination. She served as the organization's executive director for 8 years and led its efforts to handle approximately 200 cases each year, including employment discrimination, school bullying and harassment, land use opposition hate crimes and wandlism, profiling, and extra-judicial exile.

She launched a free legal clinic, created a corporate training program to help businesses practice inclusivity founded a civic engagement leadership program that provides youth opportunities such as a mock student legislature, and led outreach efforts, including creating community coalitions and organizational partnerships. Under her leadership, the nonprofit received numerous awards and recognitions, including the Difference Makers Award from the American Bar. Association and the Nonprofit Mission and Excellence Award from the Minnescate Council of Nonprofits.





Some of Lori's awards and recognitions include a Congressional Tribute, St. Catherine University Alumni Award, and the Minnesota Governor's Distinguished Service Award. She was named one of the Ten Outstanding Young Minnesotans by the Minnesota Jayoees and featured in MinnPost's Top Young Professionals series.

Loff received her undergraduate degree from St. Catherine University and Juris Doctor from Mitchell Hamiline School of Law. She is a 2014 Archibald Bush Foundation Fellow. Lorf is part of the 2021 Cohort of the New Leaders Council and was endorsed by the Progressive Talent Pippeline.

#### GET IN TOUCH

For event speaking inquiries, training requests, and consultations, please email <u>lori@lorisaroya.com</u>

CONTACT

POWERED B

ABOUT GALLERY TRAININGS MEDIA MOR

https://www.lorisaroya.com

## **EXHIBIT "B"**



## CONFIDENTIALITY AND NONDISCLOSURE AGREEMENT

This ag	greement is entered in	nto this 28th day of March	, 20 <u>16</u> by
and between _	Lori Saroya	(hereinafter "Recipient"), and CAII	R-Foundation, Inc. a not-
for-profit corp	oration existing unde	er the laws of the District of Columbia, doi	ing business as the
Council on An	nerican-Islamic Relati	ions (hereinafter "CAIR").	

WHEREAS CAIR possesses certain ideas and information relating to their operations, employees and donors that is confidential and proprietary to CAIR (hereinafter "Confidential Information"); and

WHEREAS the Recipient is willing to receive disclosure of the Confidential Information pursuant to the terms of this agreement for the purpose of volunteering for and/or employment by CAIR;

THEREFORE, in consideration for the mutual undertakings of CAIR and the Recipient under this agreement, the parties agree to the below terms as follows:

- Disclosure. CATR agrees that it may disclose, and the Receiver understand that he/she may receive Confidential Information during the course of their relationship.
- 2. <u>Definition</u>. Confidential Information shall mean any information, including but not limited to, presentation and training manuals, legal research, marketing materials, mailing lists, donor or supporter information, business plans, or any other valuable information or practices of CAIR, that is disclosed by CAIR or on its behalf, before or after the date hereof either directly or indirectly, in writing, orally, or by visual inspection, whether it be in human or machine readable form.

#### 3. Confidentiality.

- (a) Unauthorized Use. The Recipient agrees not to use the Confidential Information in any way except for the purpose authorized by CAIR.
- (b) No Disclosure. The Recipient agrees to use his/her best efforts to prevent and protect the Confidential Information, or any part thereof, from falling into the public domain and do avoid disclosure to any person other than CAIR's employees or volunteers that have a need for disclosure in connection with the Recipient's Authorized Use of the Confidential Information.
- (c) Protection of Secrety. The Recipient agrees to take all steps reasonably necessary to protect the secrecy of the Confidential Information and to prevent the Confidential Information from falling into the public domain or into the possession of unauthorized persons.



- 4. <u>Limits on Confidential Information</u>. he Recipient shall have no obligation with respect to information where the information:
  - (a) Was known to the Recipient prior to receiving any of the Confidential Information from CAIR;
  - (b) Has become publicly known through no wrongful act of the Recipient;
  - (c) Was received by the Recipient without breach of this agreement from a third party without restriction as to the use and disclosure of the information;
  - (d) Was independently developed by the Recipient without use of the Confidential Information; or
  - (e) Was ordered to be publicly released by the requirement of a government agency.
- 5. Ownership of Confidential Information. The Recipient agrees that all Confidential Information shall remain the property CAIR and that CAIR may use such Confidential Information for any purpose without obligation to Recipient. Nothing contained herein shall be construed as granting or implying to the Recipient any transfer of rights, any patents, or any other intellectual property pertaining to the Confidential Information. Recipient covenants to return any originals or copies of confidential and proprietary information obtained during the course of employ, whether tangible or intangible to CAIR immediately upon termination regardless of whether said termination is involuntary or not.
- Term and Termination. The obligations of this agreement shall be continuing until CAIR
  determines that the Confidential Information disclosed to the Recipient is no longer
  confidential.
- Survival of Rights and Obligations. This agreement shall be binding upon, inure to the benefit
  of, and be enforceable by (a) CAIR, its successors and assignees; and (b) the Recipient, its
  successors and assignees.

## 8. General Provisions.

- (a) This Agreement shall be governed by and construed in accordance with the laws of the District of Columbia.
- (b) Should litigation arise concerning this Agreement, the prevailing party shall be entitled to its attorney's fees and court costs in addition to any other relief which may be awarded.
- (c) In the event that any provisions, or any portion thereof, of this Agreement is determined by competent judicial, legislative or administrative authority to be prohibited by law, then such provision or part thereof shall be ineffective only to the extent of such prohibition, without invalidating the remaining provisions of this Agreement.
- (d) This Agreement contains the full and complete understanding of the parties with respect to the subject matter hereof, and supersedes all prior representations and understandings, whether oral or written.

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IN WITNESS WHEREOF, the parties have executed this agreement effective as of the date written above.

Recipient	CAIR-Foundation, Inc. (CAIR)	
Signed Control	Signed Signed	
Print Name Lori Saroya	Print Name Nihad Awad	
Title Chapter Development Director	Title Extentive Director	
Date 3-28-16	Date 3-28-16	

# EXHIBIT "C"

From: Lori Saroya [mailto:lsaroya@outlook.com]

**Sent:** Thursday, June 21, 2018 3:21 PM **To:** Lori Saroya <lsaroya@outlook.com> **Subject:** \$500,000 chapters grant

#### REDACTED

In 2017, CAIR was awarded a \$500,000 grant from the Silicon Valley Community Foundation through the donor-advised fund Solidarity Giving/Sunlight Giving. The \$500,000 grant was to be distributed by CAIR National **directly to chapters.** 

### To verify this:

- 1. Go to http://www.solidaritygiving.org
- 2. Under the grantees section, there is a link to "DOWNLOAD ALL GRANT DATA" and it includes the following information:

genera

2017 Cair Foundation Inc Affiliate Strategy \$ 500,000

For your convenience, I am also attaching it to this email.

I am surprised to learn from several chapters that, more than one year later, the 2017 grant was not distributed directly to chapters as was its intended purpose, and many are not even aware of the \$500,000 grant. This may have been an oversight so I feel obligated to bring it to your attention.

The website states that the grant manager at Solidarity Giving/Sunlight Giving is REDACTED < REDACTED @solidaritygiving.org>

Lori Saroya

----- Original message -----

From: Lori Saroya <lsaroya@outlook.com>
Date: 6/23/18 2:23 PM (GMT-08:00)
To: REDACTED @cair.com>

Subject: IMPORTANT RE \$500,000 chapters grant

#### REDACTED

A few days ago, I alerted you to a \$500,000 grant for chapters from the Silicon Valley Community Foundation through the donor-advised fund Solidarity Giving/Sunlight Giving. In response, I have been threatened with a lawsuit by CAIR National (see attached letter). This is an attempt to keep me quiet and stop advocating for chapters. I'm not sure what will happen with the lawsuit, but please be aware that this issue is legitimate. The grant was intended for chapters, the foundation stated that we needed to give the funds directly to chapters, and the foundation is under the impression that the funds have already been distributed to chapters. The foundation selected six national nonprofits with affiliates (CAIR, HIAS, Planned Parenthood, IRC, ACLU, La Raza) and gave them all the same grant. They gave \$100,000 to each national organization and \$500,000 to their affiliates. They presented a choice- to either give the \$500,000 directly to the affiliates or to give it to the national office to disburse to affiliates. CAIR chose the second option (disburse to affiliates). I tried to disburse funds directly to chapters when they needed to hire staff, hold fundraisers, attend trainings and conferences,

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purchase IT software, and more but was told by the Controller that there was no mechanism or procedure in place to give grants to a third party, separate 501c3s. It was entirely up to the Controller and Executive Director to approve and issue checks to chapters. I did not have direct access to any funds at CAIR National, including the money I brought in through grants and donors.

Also, it is unreasonable and unrealistic for a civil rights organization to expect an individual to give up her constitutional right to free speech by requiring her to not make any "disparaging, negative or adverse remarks, whatsoever, whether in public or private, concerning CAIR, including its employees, members of its board of directors, business or products and services."

Please know that my intention is not to harm an organization that I spent 11 years building, but I'm unable to admit to factual inaccuracies or give up my Constitutional right to free speech.

Lori Saroya 612-327-6700

LSaroya@outlook.com

From: REDACTED @cair.com

Sent: Saturday, June 23, 2018 10:51 AM

To: <a href="mailto:lsaroya@outlook.com">lsaroya@outlook.com</a>

**Cc:** REDACTED @cair.com>; REDACTED

@cair.com>; REDACTED

@cair.com>; REDACTED

REDACTED @cair.com>

**Subject:** Cease & Desist Letter (HIGH PRIORITY)

**Importance:** High Dear Ms. Saroya,

Please see the attached cease and desist letter. Thank you.

## REDACTED



453 New Jersey Ave, SE Washington, DC 20003

REDACTED www.cair.com

#### REDACTED

#### Licensed to practice in MI, NY and DC.

[This email may contain confidential and privileged material for the sole use of the intended recipient(s). Any review, use, distribution or disclosure by others is strictly prohibited. If you are not the intended recipient (or authorized to receive for the recipient), please contact the sender by reply email and delete all copies of this message.]

WEB | FACEBOOK | TWITTER

# **EXHIBIT "D"**

### Begin forwarded message:

From: Vbb Sdd <<u>vbbsdd55@gmail.com</u>>

**Subject: Re: CAIR grant** 

Date: October 14, 2018 at 6:52:11 PM PDT

**To:** REDACTED @solidaritygiving.org

Thanks, any updates?

On Thu, Oct 4, 2018 at 12:26 AM REDACTED
Hi Ahmed -

@solidaritygiving.org> wrote:

..., .........................

Thank you for your email. We have reached out to CAIR National to discuss the matter.

Best,

REDACTED

>

- > On Oct 2, 2018, at 7:11 PM, Vbb Sdd <<u>vbbsdd55@gmail.com</u>> wrote:
- > Hello, Last year, your foundation awarded \$600,000 to the Council on American-Islamic Relations (CAIR). Many CAIR chapters were unaware that \$500,000 of the funds were intended for them and \$100,000 was for CAIR National HQ. There has been some internal strife over this grant. The employee at CAIR National who got the grant resigned and said she was prevented from giving the money directly to chapters and was asked to use the grant money to hire HQ staff, purchase software, and other uses that would directly benefit HQ.
- > On your website it states: "CAIR distributed funds to chapters directly." Was the \$500,000 grant to be distributed directly to CAIR chapters? Is it possible for you to divide up the funds and distribute them directly among the 30 CAIR chapters? Can you open a formal investigation into

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how the funds are being used by CAIR National?

- > We appreciate your generous help but have yet to see the grant money in our chapter.
- > Best,
- > Ahmed Vali

## **EXHIBIT "E"**

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### GOVERNMENT OF THE DISTRICT OF COLUMBIA

Department of Employment Services

MURIEL BOWSER MAYOR



DR. UNIQUE MORRIS-HUGHES
DIRECTOR

February 8, 2021

### **INITIAL DETERMINATION**

Claim Number: 21-WP-4523

COMPLAINANT
Asma Lori Saroya

REDACTED

RESPONDENT

Nehad Awwad (CEO) Cair –Foundation Inc. 453 New Jersey Avenue SE Washington, DC 20003

The Office of Wage-Hour (OWH) has completed an investigation of the unpaid wages alleged to be due to **Asma Lori Saroya** from **CAIR Foundation**, **Inc.**, while performing work in the District of Columbia.

## **Summary of Evidence**

The Office of Wage-Hour (OWH) received a complaint from the complainant on October 31, 2020 alleging that she was not paid specifically, for the alleged non-payment of reimbursement of mileage, training, travel, hotel/lodging, and cell phone expenses while performing work in the District of Columbia for Cair-Foundation Inc. for the period of July 21, 2016 through May 7, 2018. Complainant provided copies of her expenses and emails to the company regarding her reimbursement. The OWH sent a Notice of Initial Claim date December 10, 2020 to the company/employer giving the company 20 days to respond to the claim.

The company/employer responded to the claim denying owing the complainant any wages as the complainant was paid for all hours worked and does not owe any reimbursement expenses. The company/employer provided copies of the complainant's payroll records and various emails between the complainant and the company regarding reimbursement of expenses.

#### **Findings of Fact**

OWH reviewed all evidence submitted by the complainant and the company/employer. The records submitted by the employer showed that the complainant was paid for all hours worked during her tenure with the company. The company does have a policy that employees will be reimbursed for expenses. With regards to the complainants request for reimbursement of expenses for the year 2016 and 217 the statute of limitations have passed as stated in DC Code §32-1303 "An aggrieved employee may recover only those amounts that became lawfully due and payable within a 3 year period before the date the complaint was filed"; also there is an email dated December 31, 2016 from the complainant informing the company that she would like her 2016 expense reimbursements classified as donations. There is no

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proof of the complainants 2018 reimbursements actually being submitted to the company; although there is an email date May 11, 2018 that the complainant would be sending them to the company later that night. Based on the evidence submitted OWH has determined that the complainant is not owed for any unpaid wages.

#### Conclusions of Law

In accordance with the provisions of the WAGE THEFT PREVENTION AMENDMENT ACT OF 2014 (the Act), the OWH has concluded that the company is in no Violation of the Act.

According to § 32-1301(3) (E) Wages means all monetary compensation after lawful deductions, owed by an employer, whether the amount owed is determined on a time, task, piece, commission, or other basis of calculation. The term "wages" includes a;

E. Other remuneration promised or owed

## Requirements for Relief

CAIR Foundation, Inc. must provide no relief to Asma Lori Saroya.

### Appeal Procedures

If the losing party contests the findings or requirements for relief in this Initial Determination, then they have two options for appeal.

- 1. Contact the Office of Wage Hour immediately to request conciliation. Pursuant to DCMR § 32-1308.01. (d)(1) The mayor shall work with the parties in attempt to conciliate. Any conciliation agreement shall be between the respondent and the complainant and shall be reduced to an administrative order requiring the respondent to pay any unpaid wages, compensation, liquidated damages, and fine or penalty owed and requiring the respondent to cure any violations.
- Contact the Office of Administrative Hearings within 30 days of receiving this Initial Determination and the attached Final Notice of Right to Formal Hearing. The request form shall be delivered directly to the Office of Administrative Hearings and a copy shall be provided to the Office of Wage-Hour.

### Final Administrative Order

Pursuant to DCMR § 32-1308.01. (c)(10)(B) If a party does not timely file for a formal hearing before an administrative law judge, this initial determination shall be deemed a "Final Administrative Order" and shall be enforceable in the Superior Court of the District of Columbia.

was Die eine Program Analyst

#### **CERTIFICATE OF SERVICE**

Pursuant to Superior Court Rule 5(b)(2)(C), I HEREBY CERTIFY THAT a true copy of the foregoing Initial

Determination, Final Notice of Right to File for Formal Hearing, Formal Hearing Request Form was

mailed, certified, postage prepaid, on February 8, 2021 to Nehad Awwad (CEOs) of Cair-Foundation Inc. at
the last known address of 453 New Jersey Avenue SE Washington, DC 20003. I declare under penalty of
perjury that the foregoing is true and correct to the best of my knowledge and belief.

Nehad Awwad (CEO) Cair –Foundation Inc. 453 New Jersey Avenue SE Washington, DC 20003

Lena F. Masri (Registered Agent) c/o Cair-Foundation Inc. 453 New Jersey Avenue SE Washington, DC 20003

Asma Lori Saroya (Complainant)

REDACTED

Donna Brown Program Analyst

### GOVERNMENT OF THE DISTRICT OF COLUMBIA

Department of Employment Services

MURIEL BOWSER
MAYOR



DR. UNIQUE MORRIS-HUGHES
DIRECTOR

**February 8, 2021** 

## Final Notice of Right to File for a Formal Hearing

Claim Number: 21-WP-4523

Nehad Awwad (CEO) Cair –Foundation Inc. 453 New Jersey Avenue SE Washington, DC 20003

Asma Lori Saroya (Complainant)

## **REDACTED**

Dear Nehad Awwad and Asma Saroya:

As of **February 8, 2021**, the Office of Wage-Hour (OWH) has completed an investigation of the wage complaint filed by **Asma Saroya** against **CAIR Foundation, Inc.** and has issued an Initial Determination. Pursuant to DCMR § 32-1308.01. (e)(1) "Within 30 days of the issuance of the initial determination or an administrative order, not issued as a result of conciliation, or within 30 days of receiving notice of a right to file for a formal hearing before an administrative law judge under this subsection, whichever is later, a party may file for a formal hearing before an administrative law judge."

Either party has a right to file for a formal hearing before an administrative law judge by timely completing, signing and filing the enclosed "REQUEST FOR FORMAL HEARING" directly with the Office of Administrative Hearings at:

Office of Administrative Hearings 441 Fourth Street NW, Suite 450 N Washington, DC. 20001

Also the filing party should notify the Office of Wage-Hour of the filing for a formal hearing before an administrative law judge by timely completing, signing and returning the enclosed "REQUEST FOR FORMAL HEARING" directly to the Office of Wage-Hour at:

Michael Watts, Associate Director Office of Wage-Hour 4058 Minnesota Avenue, NE, Suite 3600 Washington, DC. 20019 The hearing shall be scheduled within 30 days of a request, except that the administrative law judge may grant each party one discretionary continuance due to hardship or scheduling of up to 15 days. The administrative law judge may grant any other request for continuance only for good cause.

Further guidance for the procedures to be followed by the Office of Administrative Hearings after the filing for a formal hearing shall be pursuant to DCMR  $\S$  32-1308.01. (e)&(f)

(e)(2) The administrative law judge shall have the authority to administer oaths, issue subpoenas, compel the production of evidence, receive evidence, and consolidate 2 or more complaints into a single hearing where such complaints involve sufficiently similar allegations of fact to justify consolidation.

(3) All parties shall appear at the hearing, with or without counsel, and may submit evidence, cross-examine witnesses, obtain issuance of subpoenas, and otherwise be heard. Testimony taken at the hearing shall be under oath, and a transcript shall be made available at cost to any individual unless the case is sealed. Testimony may also be given and received by telephone.

(4) The burden of proof by a preponderance of the evidence shall rest upon the complainant, but shall shift to the respondent when the following conditions are met:

(A) A respondent failed to keep records of an employee's hours worked, or records of compensation provided to an employee are imprecise, inadequate, missing, fraudulently prepared or presented, or are substantially incomplete; and

(B) A complainant presents evidence to show, as a matter of just and reasonable inference, the amount of work done or the extent of work done or what compensation is due for the work done.

(5) Where the conditions in paragraph 4(A) and (B) of this subsection are met, the respondent must present compelling evidence of the precise amount of work performed and exact compensation promised or present compelling evidence to negate the reasonableness of the inferences drawn from the complainant's evidence. If the respondent fails to meet this burden, the administrative law judge shall award damages based on the complainant's evidence and may award approximate damages where necessary.

(6) If a respondent does not appear after receiving notice of a hearing pursuant to this section, the administrative law judge shall proceed to hear proof of the complaint and render judgment accordingly. If, after receiving notice of a hearing pursuant to this section, the complainant does not appear, the administrative law judge shall dismiss the complaint without prejudice.

(f)(1) At the conclusion of the hearing, the administrative law judge shall issue a decision setting forth a brief summary of the evidence considered, findings of fact and conclusions of law, and an order detailing the relief determined appropriate to the parties and their representatives within 30 days of the hearing.

(2) Appropriate relief shall include the payment of any back wages unlawfully withheld, liquidated damages equal to treble the amount of unpaid wages, statutory penalties, reasonable attorney fees and costs, and other legal or equitable relief as may be appropriate, including reinstatement in employment, and other injunctive relief.

(3) The decision and order shall be considered a final administrative ruling, enforceable in a court of competent jurisdiction, and reviewable as provided by applicable law.

If you have any questions regarding this matter, please contact me at 202-671-1880.

Sincerely,

Doma Brown Program Analyst

Office of Wage-Hour

ENCLOSURE(S): REQUEST FOR FORMAL HEARING

### **OWH Claim Number: 21-WP-4523**

DEPARTMENT of EMPLOYMENT SERVICES
OFFICE OF WAGE-HOUR

OWH No. 26 Formal Hearing ALI Request

	OR FORMAL HEARING of Administrative Hearings and a copy to Office of Wage-Hour)
1. REQUESTOR'S NAME:	
	(M.) (Last)
	TRATIVE LAW JUDGE because there was no initial determination
	conduct the hearing or other proceedings in your case. nd place based on the information provided below.
	You have a right to be represented at the hearing.
3. REQUESTOR'S SIGNATURE DATE	4. REPRESENTATIVE'S NAME DATE
REQUESTOR'S ADDRESS	ADDRESS
CITY STATE ZIP CODE	CITY STATE ZIP CODE
TELEPHONE NUMBER FAX NUMBE	ER TELEPHONE NUMBER FAX NUMBER
TO BE COMPLETED BY THE OFFICE OF WAGE-HOUR, A	AT THE TIME OF "NOTICE OF RIGHT TO FILE FOR FORMAL HEARING"
This Wage Complaint was served to Respondent by the OWH:	1 924 en Mareryon: 12/10/2020
	Compliance Specialist Date
The Initial Determination was issued to both Parties by the OWH:	Compliance Specialist Date
Interpreter needed   YES   NO	TYPE OF COMPLAINT:
Language (including sign language):	Check all claim types that apply:
NATURE OF VIOLATION:	
	Bad Check:   Commisions:   YES   NO  Final Measure  TIES   DNO
Enhanced Professional Security Act: □ / Living Wage □	Final Wages:
물레즐리 가지 않아요. 생물리 시간 보기 보기 보다는 사람들이 되는 것도 있습니다. 그 사람들이 되었다.	Retaliation
Overtime	Shortage of Hours YES NO
Retaliation	Unauthorized Deductions: YES NO
Wage Statement □	Vacation Pay:
Work Place Fraud □	
	ISTRATIVE HEARING AND RETAIN A COPY FOR YOUR RECORDS

Office of Administrative Hearings 441 Fourth Street NW, Suite 450 N Washington, DC. 20001

## **EXHIBIT "F"**

From: NationBuilder < notifications@nationbuilder.com>

**Sent:** Tuesday, October 1, 2019 10:27 AM **To:** REDACTED @cair.com>

**Subject:** [cairhq] REDACTED, you have a new comment



Lori Haidri commented on Urgent: Early-Bird Discount for CAIR's 25th Anniversary Gala in D.C. Ends at Midnight

"Last year, I said goodbye to CAIR National and all their dysfunction and abuse- and resigned from my job as Chapter Director. It was the most empowering feeling- and I got a small glimpse into how people might feel when they finally end an abusive relationship, or get freed from prison, or leave a cult. But I should have known it was too good to be true. I wasn't really free from CAIR because they withheld my pay, bonus, and reimbursements. Today, they still owe me over \$20,000 in pay and reimbursements, plus attorney's fees. As you're considering which nonprofits to support and donate to, I want you to be diligent- do your research and ask the tough questions. Is your money really helping to empower people in the community who have been discriminated against, or are you empowering a toxic entity that has a pattern of discriminating against its own

employees and further victimizing people who seek their help? Is your money going to pay an attorney to fight for people's rights to practice their faith or is your money going to pay an attorney to suppress, silence, and intimidate other Muslims who have been treated unjustly? Are you supporting legitimate, sincere advocates for justice or those who support the status quo and are spineless when the injustice is committed by their own national leaders? Chapters are very capable of standing up for justice, but they look the other way and do nothing when their national leaders are the perpetrators of injustice. That's hypocrisy. There are many people who have been directly harmed. The "CAIR Sexism Documentation Project" currently has 35 members, mostly women, who share their experiences of facing discrimination, and other abuses, by the nation's largest Muslim civil rights organization. https://www.facebook.com/groups/2228298364100050/ Employment discrimination lawsuit filed against CAIR-CA. SEE:

https://www.docdroid.net/FjATdM9/onlinedocument.pdf?fbclid=IwAR3kblVLDu8oXfJi23uudSNdl10\_b9nlYmbLFptZPvyaYYSyd\_s5OCddSVg

This review was posted to CAIR-New Jersey on 9/23: "I do not recommend donating your money to CAIR-NJ. I believe there may be a warrant out for the arrest of a former CAIR-NJ board member, who served as this organization's treasurer, for stealing CAIR-NJ money by writing himself checks. Donors should definitely question whether their charity is legitimately being used to do civil rights advocacy, how this was allowed to happen, and whether the organization is being fully transparent. Full disclosure: I am a former Executive Director of CAIR-NJ and found the board leadership to be quite inadequate and corrupt at the expense of the community and even moreso at the expense of its staff." I worked with CAIR in various capacities for 11 years, chapter founder, chapter executive director, national board member, and national chapter director and I'm convinced that CAIR creates more victims than it helps. It does more harm than good, whether it's the continuous negative portrayal of Muslims as victims in the media, lack of strategy, making serious mistakes on people's cases, providing inconsistent services, the all-male press conferences, failure to build a legitimate nationwide infrastructure, lack of community engagement on the national level, not having a seat at many tables despite being around for 25 years and having an office a few blocks from the US Capitol, and so much more. Are you aware that there are at least THREE lawsuits in 2019 alone by former employees/board members? Chapters have a responsibility to step up and fix their organization. As civil rights activists, they should be on the frontlines of holding themselves accountable. The community deserves a legitimate civil rights and Islamic organization that treats all people with the respect and dignity they deserve."



## Lori Haidri

Email: lsaroya@outlook.com

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LS · a year ago

Hypocritical to have CAIR part of this after their Muslim ban lawsuit that some lawyers called "disastrous" and "ridiculous." CAIR is an incompetent and toxic organization that does not speak on behalf of American Muslims. Over 35 people, mostly women, have reported serious issues of religious and gender discrimination, sexual abuse and exploitation, retaliation, union busting, hostile work environment, financial abuse and mismanagement- including losing their 501c3 and issues with their Washington Trust Foundation entity receiving international donations- board incompetence, tokenism, and more.

CAIR Sexism Documentation Project

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Discussion on Religion News Service · 13 comments

#### Muslim advocates demand Bloomberg apologize for NYPD spying program



LS · a year ago

CAIR shouldn't have signed onto this. They need to focus on their own internal issues, whether it is a lack of transparency around international funding through their Washington Trust Foundation, financial mismanagement and board incompetence (to the point of not filing 990s several years in a row and losing their 501c3 status), sexual abuse and harassment, religious discrimination, union busting, retaliation, etc.

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Discussion on KLCC · 1 comments

#### Woman Charged With Hate Crime For Allegedly Harassing Saudi Arabian PSU Student



LS · a year ago

This is terrible, but CAIR is not a credible source. It's a controversial organization that does NOT speak for most American Muslims. I was involved with CAIR in various capacities for nearly 12 years: chapter founder, chapter executive director, national board member, and national chapter director. After everything I witnessed and experienced, I am convinced that CAIR creates more victims than it helps. It does more harm than good, whether it's the continuous negative portrayal of Muslims as victims in the media, lack of strategy, making serious mistakes on people's cases, providing inconsistent services, the all-male press conferences, lack of transparency around international funding sources and agendas, the embarrassing media spokespeople, failure to build a legitimate nationwide infrastructure, being a laughing stock on Capitol Hill despite having an office a few blocks from the U.S. Capitol, lack of community engagement on the national level, and, after 26 years, not having a seat at MANY tables (including the Leadership Conference on Civil and Human Rights, which brings together 200+ national civil rights organizations).

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Discussion on Religion News Service + 5 comments

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CAIR-LA calls for hate crime investigation into anti-Mu

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LS × a year ago

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When I resigned from CAIR, it was the most empowering feeling- and I got a small glimpse into how people might feel when they finally end an abusive relationship, or get freed from prison, or leave a cult. But I should have known it was too good to be true. I wasn't really free from CAIR because they withheld my pay, bonus, and reimbursements. Almost two years later, they still owe me over \$20,000. And I'm not the only one-former executive directors in Iowa and New Jersey also allege unfair employment practices and say they are each owed nearly \$25,000 by their CAIR employers.

As you're considering which nonprofits to support and donate to, I want you to be diligent-do your research and ask the tough questions. Is your money really helping to empower people in the community who have been discriminated against, or are you empowering a toxic entity that has a pattern of discriminating against its own employees and further victimizing people who seek their help? Is your money going to pay an attorney to fight for people's rights to practice their faith or is your money going to pay an attorney to suppress, silence, and intimidate other Muslims who have been treated unjustly? Are you supporting legitimate, sincere advocates for justice or those who support the status quo and are spineless when the injustice is committed by their own national leaders?

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#### LS · a year ago

@CAIR It is hypocritical to show up in the media and act like you care about justice and civil rights when you have turned your back to serious issues of abuse and discrimination inside your own organization. Why look the other way and do nothing when your national leaders are the perpetrators of injustice?

#CAIR Council on American-Islamic Relations discriminates against and abuses its own employees, especially #women. There are issues of religious #discrimination, sexual #harassment, #retaliation, #hostile work environment, #union busting, financial #mismanagement (including losing their 501c3 status and questions around international funding through their Washington Trust Foundation), lack of board oversight, board #incompetence, and other serious issues at CAIR. Donor funds are directly going to pay for attorneys to suppress, silence, and intimidate those who have been treated unjustly.

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Discussion on WCAV + 2 comments

#### Bill to end Lee-Jackson Day, make Election Day state holiday passed



#### LS · a year age

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Discussion on Religion News Service · 25 comments

#### Religious groups applaud new Air Force rules allowing turbans, hijabs, beards



#### LS · a year ago

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https://www.facebook.com/gr..

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Local immigration advocates speak on SCOTUS "public

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LS + a year ago

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There are issues of religious #discrimination, sexual #harassment, #retaliation, #hostile work environment, #union busting, financial #mismanagement (including losing their 501c3 status and questions around international funding through their Washington Trust Foundation), lack of board oversight, board #incompetence, and other serious issues at CAIR. Donor funds are directly going to pay for attorneys to suppress, silence, and intimidate those who have been treated unjustly.

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 $There were several \ lawsuits in 2019 \ by former \ employees/board \ members. \ Employment \ discrimination \ lawsuit \ filed \ against \ CAIR-CA. \ SEE:$ 

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Some of the local funds that chapters raise goes directly to National as part of chapter affiliation fees. And when, for 25 years, you are the national founder, national board member with no term limits, and national executive director, you have immense power on how that money is spent- including buying a brand new SUV for the executive director, paying expensive DC lawyers to shut down staff efforts to unionize, hiring attorneys to harass and intimidate women who ask for equal pay and report abuse and sexual harassment, etc. Chapters are aware of the issues but look the other way and do nothing.

This review was posted by the former executive director of a chapter: "I do not recommend donating your money to CAIR-NJ. I believe there may be a warrant out for the arrest of a former CAIR-NJ board member, who served as this organization's treasurer, for stealing CAIR-NJ money by writing himself checks. Donors should definitely question whether their charity is legitimately being used to do civil rights advocacy, how this was allowed to happen, and whether the organization is being fully transparent. Full disclosure: I am a former Executive Director of CAIR-NJ and found the board leadership to be quite inadequate and corrupt at the expense of the community and even moreso at the expense of its staff."

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Ultimately, nothing good can come out of corruption and injustice. The community deserves a legitimate civil rights and Muslim organization that treats all people with the respect and dignity they deserve.

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Discussion on Washington Report on Middle East Affairs · 1 comments

#### **Resolution Urges India to Respect Human Rights of All Citizens**



LS + a year ago

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between the two organizations. The FACE executive director is a former CAIR executive director. The FACE founder and board chair is on the CAIR Dallas board of directors. The FACE vice chair is the chair of the CAIR

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I was with CAIR for nearly 12 years in various roles (chapter founder, chapter executive director, national board member, national chapter director) and was a witness to many disturbing incidents. CAIR has a pattern of discriminating against and mistreating their own employees, especially women. Donor funds are directly going to pay for attorneys to suppress, silence, and intimidate those who have been treated unjustly. When I resigned, they asked me to sign a non-disparagement agreement. When I refused, they withheld my pay, bonus, and reimbursements. 1.5 years later, CAIR still owes me over \$20,000.

FACE does important work but protecting their friends at CAIR and literally ignoring several people who have asked for their help with the CAIR issues is just unethical.

Discussion on Religion News Service · 8 comments

#### Ta'leef Collective cuts ties with founder over alleged misconduct



LS · a year ago

Great article but the organization FACE (Facing Abuse in Community Environments) looks the other way and does nothing when it comes to issues reported to them about CAIR (Council on American Islamic Relations). There is too much overlap between the two organizations. The FACE executive director is a former CAIR executive director. The FACE founder and board chair is on the CAIR Dallas board of directors. The FACE vice chair is the chair of the CAIR Dallas board of directors.

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#### Local immigration advocates speak on SCOTUS 'public charge' ruling

By MICHAEL MROZIAK (/PEOPLE/MICHAEL MROZIAK) - JAN 28, 2020

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The matter is still being argued in litigation. But on Monday, the U.S. Supreme Court voted to allow the Trump administration to impose new rules on immigrants and use of public benefits, rules which may adversely affect the permanent residency status of some. In Buffalo, some who serve "New Americans" say most are not affected by the change but add that many are missing out on deserved benefits out of fear their status would chance.

A 'public charge,' by definition, is an individual who relies on government support for at least half of one's income. The Trump administration is seeking to expand public charge rules on immigrants by including use of public benefits such as food stamps, Medicaid or housing vouchers while screening individuals as potential public charges. Those deemed to be destined for public charge status could be denied a green card or entry into the U.S.

The Supreme Court, in a 5-4 ruling with conservative justices in the majority (https://www.npr.org/2020/01/27/800158106/supreme-court allows-trump-administration-rule-for-immigrants-on-public-benefits), allowed the administration to enforce the new rules while little matter remains in lower ourts. Monday's decision reverses a lower court's decision to suspend the new rules while littlead in was in progress.

In Buffalo, attorney Karen Welch of Neighborhood Legal Services says most local immigrants are not affected by the ruling.

"The majority of people in Western New York probably came here for humanitarian reasons," she explained. "We have a very large refugee and asylee population. Those individuals will not be affected. They're exempt from the public charge provisions."

Those who would be affected by the administration's rules, Welch says, include immigrants who are currently in the greed card application process, sponsored by a family member or by a small business owned by family members. Others affected include individuals who do have a green card but have traveled outside the United States for more than 180 days or have traveled and have a criminal conviction.

Refugees and asylees, Welch says, are eligible for federal benefits. Many local refugees get help from the immigrant and Refugee Assistance Program at Catholic Charities. Bill Sukaly, the program's director, says one of the problems with the Trump administration's policy toward immigration and public charge is that many of their client fear they, too, are at risk of a status change.

"What's happened is we've had refugee clients say they don't want to reapply for benefits because they're afraid it's going to affect their status going forward," he said.

Welch agrees with the belief that many are already becoming confused about who is affected by the updated policy. She also expresses concern for immigrants who have come here through the green card system and are productive residents but may rely on some public assistance, especially housing.

"They're here. They're working," she said. "We know housing is really unaffordable to a lot of the working poor, so they do look for federal benefits to assist them, with rental assistance. Now, receipt of those would make them subject to public charge."

National-level critics of Monday's decision include the Council on Islamic-American Relations (CAIR). Its government affairs director, Robert McCaw, Issued the following written statement late Monday: "The Supreme Court's decision will further marginalize immigrant communities and will inevitably create a socioecomonic hierarchy in our immigration system. The Trumo administration's policy could quite literally kill people by making them too afraid to seek life-saving medical care, and the Supreme Court seems to agree such a cruel system is acceptable."

McCaw and CAIR are urging members of Congress to pass the No Federal Funds for Public Charge Act of 2019 (https://www.congress.gov/bill/13cti-congress/house-bill/3222/toxt), which would block federal funding to Homeland Security for use in enforcing the updated public charge rules.

Welch, meanwhile, recommends immigrants - and those who employ or serve them - become informed on the new rules and who is actually affected.

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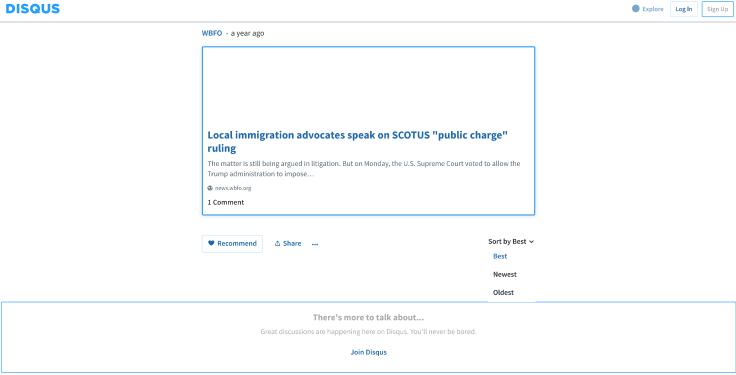
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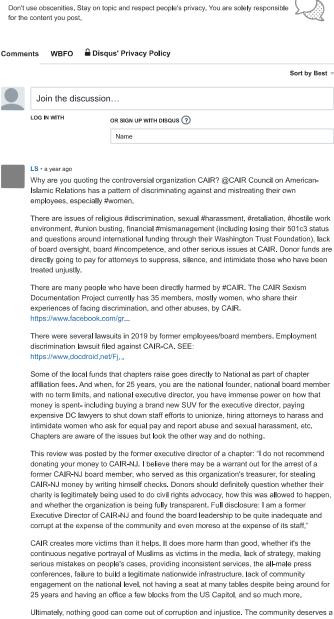
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Ultimately, nothing good can come out of corruption and injustice. The community deserves a legitimate civil rights and Muslim organization that treats all people with the respect and dignity they deserve.

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# EXHIBIT "



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News

### Muslim advocates demand Bloomberg apologize for NYPD spying program

A coalition of leading Muslim advocacy organizations sent a letter to Bloomberg this week demanding he apologize for the blanket surveillance in the decade after 9/11 and condemn the use of similar spying programs.



Democratic presidential candidate and former New York City Mayor Mike Bloomberg gestures as he speaks during a campaign event, Thursday, Feb. 20, 2020, in Salt Lake City. (AP Photo/Rick Bowmer)

February 21, 2020 By Aysha Khan

(RNS) — Calls are growing for Mayor Mike Bloomberg to apologize for his role in the New York Police Department's long-running warrantless surveillance of area Muslims, which has seen renewed scrutiny since Bloomberg announced his candidacy for Democratic presidential nominee.

A coalition of leading Muslim advocacy organizations sent a letter to Bloomberg this week demanding he apologize for the blanket surveillance in the decade after 9/11 and condemn the use of similar spying programs.

"The NYPD's mass surveillance program ostracized our community, created a rift between law enforcement and Muslims, chilled free speech, and resulted in long-lasting psychological trauma," advocates wrote in a letter to Bloomberg. "Countless children and young adults who were befriended by individuals they later realized were undercover officers today mistrust new acquaintances. Many people stopped participating in religious life out of fear they might end up on NYPD's Muslim database for the simple act of practicing their faith."

Bloomberg apologized for his controversial stop-and-frisk policy since launching his campaign but has continued to defend the secretive surveillance program that launched in 2003 and lasted until after he left office in 2013.

"I'm the biggest supporter of the Muslim community...The police only went in when the mosque, when the imam asked us to go in," Bloomberg told one activist in December at the opening of his Milwaukee campaign offices, per a video recording of the encounter. "Period. End of story."

But, according to a Pulitzer Prize-winning investigation series by The Associated Press, the NYPD surveilled minority neighborhoods,

mapped hundreds of mosques and Islamic organizations as well as bookstores and bars, monitored sermons, eavesdropped on conversations and placed paid informants in places of worship and Muslim student organizations.

Surveillance cameras. Photo by Jonathan McIntosh/Creative Commons

This month, when Bloomberg's campaign met with Muslim and Arab community leaders in Michigan and published an Arabic-language campaign ad in Dearborn newspaper The Arab American News, advocates called the moves "hypocritical."

"Under then-Mayor Bloomberg's Muslim spying program, reading an Arab American newspaper in public or even just speaking Arabic would have been justification enough to be surveilled and profiled by the NYPD," Muslim Advocates Public Advocacy Director Scott Simpson said. "Bloomberg is campaigning in the same language he once flagged as a warning sign. The NYPD's Muslim spying program profiled people based on their ethnic origin, the types of restaurants they went to, the language they spoke or simply whether they attended a mosque."

The NYPD focused on neighborhoods associated with African American Muslims as well as 28 so-called "ancestries of interest" — though it explicitly excluded non-Muslim groups from Muslim-majority countries, such as Iranian Jews or Egyptian Copts, from its surveillance.

Police have said the program, which has been praised by President Trump and which Bloomberg upheld as a national counterterrorism model, did not generate any leads.

Instead, advocates argue, it violated minorities' civil rights and further stigmatized these communities.

"In the past, you have defended this illegal attack on religious liberty by saying you wanted to 'keep this country safe,'" the letter notes. "Your insinuation that being Muslim represents a public safety threat plays into dangerous tropes about Islam that are typical of white supremacy discourse. In perpetuating bigoted stereotypes, your actions (... have) put the lives of American Muslims at risk of prejudice and violence."

The letter was signed by Linda Sarsour, who heads MPower Change and formerly led the Arab American Association of New York; Nihad Awad of the Council on American-Islamic Relations; Mohammed Missouri of Jetpac; and Wa'el Alzayat of Emgage, which made headlines this week for endorsing Sen. Bernie Sanders' candidacy.

A separate coalition of Muslim, Arab and South Asian organizations have also expressed concern over reports that a landmark report on Islamophobia from the liberal Center for American Progress think tank was censored to remove a chapter on the NYPD spying unit.

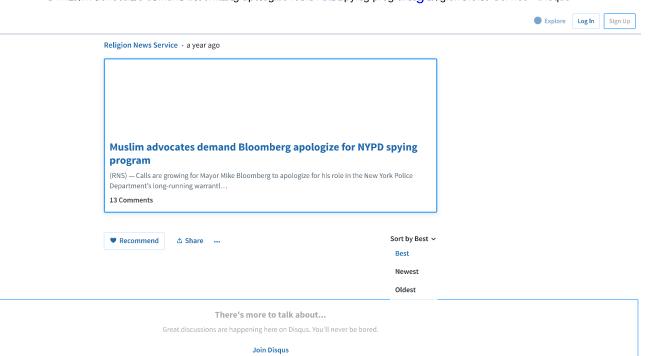
Drafts of a 2015 report, "Fear Inc 2.0: The Islamophobia Network's Efforts to Manufacture Hate in America," originally included a 4,300-word chapter detailing the NYPD surveillance and mentioning Bloomberg's name eight times.

But sources informed reporters at The New York Times that the think tank, which had accepted about \$1.5 million from Bloomberg in donations up to that point, decided to pull the chapter to avoid a "strong reaction from Bloomberg world." The Center for American Progress, which disputed the account, according to the Times, argued there had been substantive reasons to revise the section.

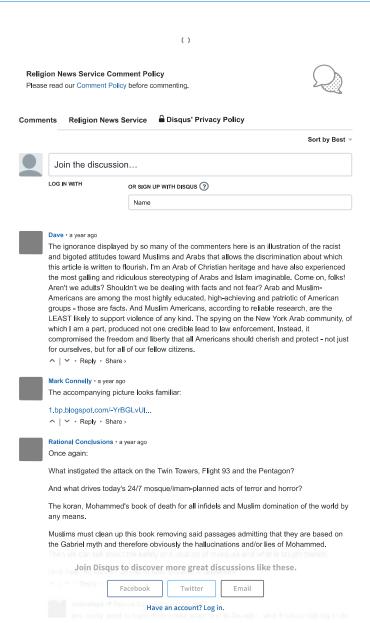
"We are deeply alarmed that CAP officials may have excluded critical documentation and reporting related to Muslim communities in New York City for fear of alienating a donor," advocates wrote.

The letter, signed by 15 organizations including MPowerChange, Justice for Muslims Collective, Muslim Justice League and American-Arab Anti-Discrimination Committee, urged the think tank to release the withheld chapter and explain the decision to remove it.





Channels on Disqus



with your distaste for islam and the other religions of the world . it has to do with your simplistic understanding of what motivates people to do evil things . ^ | ✓ • Reply • Share ›



LS • a vear ago

CAIR shouldn't have signed onto this. They need to focus on their own internal issues, whether it is a lack of transparency around international funding through their Washington Trust Foundation, financial mismanagement and board incompetence (to the point of not filing 990s several years in a row and losing their 501c3 status), sexual abuse and harassment, religious discrimination, union busting, retaliation, etc.

^ | V · Reply · Share ›



Guest → LS • a year ago

Nah, this is a fight they have some chance of winning with. Muslim Americans acting loyal were far more effective than spying efforts.

https://warisboring.com/ame. 2 ^ | V · Reply · Share ›



Ananth Sethuraman → Guest • a year ago

The very fact you feel impelled to use the words "acting loyal" shows that things are not all right.

It is not enough if Bloomberg apologize; the careers of CAIR and of the Linda Sarsours of this world should also end, for they thwart the growth of a cosmopolitan, nonjudgmental Muslim intelligentsia, and make Muslims into a sullen, resentful, unassimilated demographic.

The careers of several progressive writers should also end, for the same reason.

^ | ✓ • Reply • Share >



Guest → Ananth Sethuraman • a year ago

Has Bloomberg ever apologized?

Actually according to my prior link we already have a cosmopolitan non judgmental Muslim intelligencia in the US. And it is crapped on by wingnuts and bigots to generate hysteria and promote counterproductive policies. It turns out attacking the entire Islamic faith works to the advantage of extremists. Attacking the legitimacy of extremism is more effective.

2 ^ | V · Reply · Share:



Ananth Sethuraman → Guest • a year ago

Your link merely speaks of American Muslims turning in suspicious characters. But the discourse that produces those suspicious characters-that discourse does not come to an end.

Bloomberg will apologize if there is a simultaneous announcement that the careers of CAIR, the Linda Sarsours of this world, and several progressive writers will end.

^ | ✓ • Reply • Share >



Guest → Ananth Sethuraman + a year ago

It also speaks to the counterproductive effort of profiling and how Muslim Americans have been far more useful at dealing with extremists than outside bigots and Islamophobia.

^ | ✓ • Reply • Share >



Rational Conclusions • a year ago

As soon as Muslims apologize for their book of horror and terror known typically as the Koran!!!!!!

^ | ✓ • Reply • Share



Nadia Sindi • a year ago

http://petitions.moveon.org...

My life with Liberal Klans in Oregon!!

Arab/Muslim Americans are treated less than animals! We are called Sand N...

We are being prosecuted in a daily basis! High tech lynching, institutionally racism! Especially for Arab women!!

Oregon late A.G. Dave Frohnmayer had my SS# blocked & prevented me from getting employed, made me homeless and jobless!

Dave Frohnmayer was the one who started & initiated the fraud of Foreclosed-houses & taking over our homes!

His bank robber Rep.Bob Ackerman, Doug McCool, UO Prof. Margaret Hallock, Hired Scarlet Lee/Barnhart Associates. Forged my family's signature. Gave our fully paid Condo to the thief Broker Bob Ogle, his mom Karen Ogle was working in the USA Consulate in Jeddah, Saudi Arabia. She administered the power of attorney to have my sister signature, added her son to the deed. Sold without my signature!

Bob Ackerman had never responded to the Summon from the Court, and the sheriff never served me or arrested him either!!

This is what kind of criminal government we have in Oregon!!

Arrest Rep. Bob Ackerman, Doug Mccool, Broker Bob Ogle, his mom Karen Ogle, Scarlet

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I ran five times for public offices! Voter Fraud & Sedition by Lane County government to protect & cover up for the two criminals Frohnmayer & Ackerman!!

Oregon government is complicit with their crimes!!

https://www.facebook.com/gr...

www.davefrohnmayer.com

Please sign petition.

https://www.change.org/peti....

Dave Frohnmayer was going to kill me by sending some fabricated story after he called the manager where I used to live to tell her he was waiting for him to pick him up from the AirportI

^ | ∨ 1 • Reply • Share >



Rational Conclusions → Nadia Sindi • a year ago

Islam and it laws give women almost no rights and treats them like fodder for the male species as so bluntly noted by Ayaan Hirsi Ali in her autobiography, Infidel.

"Thus begins the extraordinary story of a woman born into a family of desert nomads, circumcised as a child, educated by radical imams in Kenya and Saudi Arabia, taught to believe that if she uncovered her hair, terrible tragedies would ensue. It's a story that, with a few different twists, really could have led to a wretched life and a lonely death, as her grandmother warned, But instead, Hirsi Ali escaped — and transformed herself into an internationally renowned spokeswoman for the rights of Muslim women."

ref: Washington Post book review.

some excerpts:

p. 47 paperback issue:

"Some of the Saudi women in our neighborhood were regularly beaten by their husbands. You could hear them at night. Their screams resounded across the courtyards. "No! Please! By Allah!"

p.68

"The Pakistanis were Muslims but they too had castes. The Untouchable girls, both Indian and Pakistani were darker skin. The others would not play with them because they were untouchable. We thought that was funny because of course they were touchable: we touchable them see? but also horrifying to think of yourself as untouchable, desp-icable to the human race."

p.309

"Between October 2004 and May 2005, eleven Muslim girls were killed by their families in just two regions (there are 20 regions in Holland). After that, people stopped telling me I was exaggerating."

p. 347

"The kind of thinking I saw in Saudi Arabia and among the Brotherhood of Kenya and Somalia, is incompatible with human rights and liberal values. It preserves the feudal mind-set based on tribal concepts of honor and shame. It rests on self-deception, hyprocricy, and double standards. It relies on the technologial advances of the West while pretending to ignore their origin in Western thinking. This mind-set makes the transition to modernity very painful for all who practice Islam".

^ | ✓ 2 • Reply • Share ›

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# Chu, Murphy, Feinstein, and Neguse Lead Effort to Block President Trump's Expanded 'Muslim Ban'

CITY NEWS SERVICE

Published on Tuesday, March 3, 2020 | 5:20 pm







[https://pasadenanow.com/main/wp-content/uploads/2020/03/Rep.-Judy-Chu-D-Pasadena-Sen.-Chris-Murphy-D-Conn-Sen.-Dianne-Feinstein-D-California-Rep.jpg]]L-R: Rep. Judy Chu (D-Pasadena), Sen. Chris Murphy (D-Conn), Sen. Dianne Feinstein (D-California), Rep. Joe Neguse (CO-2)

Congresswoman Judy Chu (D-Pasadena), and several other legislators today introduced bicameral legislation that would block the implementation of President Trump's recent executive order expanding travel restrictions for Kyrgyzstan, Myanmar, Eritrea, Nigeria, Sudan and Tanzania.

The legislation would prohibit funds, resources, and fees made available to the U.S. Department of Homeland Security, or any other federal agency from being used to implement or enforce the expanded Muslim ban. U.S. Senator Chris Coons (D-Del.) is an original co-sponsor of the legislation.

"The Muslim Ban in every form has been a vehicle for discrimination," said Chu. "It does not make America safer, but it does keep families apart. The hateful intentions were clear from the start when candidate Trump announced his intentions to ban all Muslims from entering the US. And now we see him expanding his bans in order to do so. America's vetting system is one of the best in the world, which means we do not need a ban to keep threats out of the country. And we have nothing to fear from keeping families together. That is why I'm proud to introduce this bill to stop this latest version of President Trump's Muslim Ban."



[https://www.pasadenanow.com/main/linkout/494460]

Senator Chris Murphy (D-Conn.), a member of the U.S. Senate Foreign Relations Committee and U.S. Senate Appropriations Committee, U.S. Senator Dianne Feinstein (D-California), and U.S. Representative Joe Neguse (CO-2) joined Chu.

Organizations endorsing the bill include: African Communities Together, American Civil Liberties Union (ACLU), Muslim Advocates, National Immigration Law Center (NILC), Amnesty International USA, Council on American-Islamic Relations (CAIR), HIAS, Public Affairs Alliance of Iranian Americans (PAAIA), NAFSA: Association of International Educators, National Council of

Jewish Women, Congregation of Our Lady of Charity of the Good Shepherd, National Advocacy Center of the Sisters of the Good Shepherd, and Asian Americans Advancing Justice (AAJC).



[https://www.pasadenanow.com/main/linkout/488942]

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#### Mom Stuns Dermatologists By Reducing Her Wrinkles With This Tip

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Channels on Disqus

Disgus' Privacy Policy Comments PasadenaNow-Com Sort by Best Join the discussion... LOG IN WITH OR SIGN UP WITH DISQUS (?) Name LS • a year ago Hypocritical to have CAIR part of this after their Muslim ban lawsuit that some lawvers called "disastrous" and "ridiculous." CAIR is an incompetent and toxic organization that does not speak on behalf of American Muslims. Over 35 people, mostly women, have reported serious issues of religious and gender discrimination, sexual abuse and exploitation, retaliation, union busting, hostile work environment, financial abuse and mismanagement-including losing their 501c3 and issues with their Washington Trust Foundation entity receiving international donations- board incompetence, tokenism, and more. CAIR Sexism Documentation Project https://www.facebook.com/gr... ^ | ∨ • Reply • Share › ↑ Back to Top

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# **EXHIBIT "H"**

From: REDACTED < REDACTED >

**Sent:** Monday, January 13, 2020 9:37 PM

To: REDACTED >

**Subject:** This is the FB message that I got...

along with this link: <a href="https://www.facebook.com/groups/CAIRsexism/">https://www.facebook.com/groups/CAIRsexism/</a>

As I said today, I just wanted to close the loop and fulfill my commitment to pass along her message.

Much love to you!

хохо

CAIR Council on American-Islamic Relations has a pattern of discriminating against and mistreating their own employees, especially #women.

There are issues of religious #discrimination, sexual #harassment, #retaliation, #hostile work environment, #union busting, financial #mismanagement, lack of board oversight, board #incompetence, and other serious issues at CAIR. Donor funds are directly going to pay for attorneys to suppress, silence, and intimidate those who have been treated unjustly.

There are many people who have been directly harmed by #CAIR. The CAIR Sexism Documentation Project currently has 35 members, mostly women, who share their experiences of facing discrimination, and other abuses, by the nation's largest Muslim civil rights organization. <a href="https://www.facebook.com/groups/2228298364100050/">https://www.facebook.com/groups/2228298364100050/</a>

There were several lawsuits in 2019 alone by former employees/board members. Employment discrimination lawsuit filed against CAIR-CA. SEE:

### CASE 0:21-cv-01267 Doc. 1-1 Filed 05/21/21 Page 50 of 87

https://www.docdroid.net/FjATdM9/onlinedocument.pdf?fbclid=lwAR1uMMCaznSystmODEn10py3\_q HMJsye9r4fkLKCYyecJ4dYzKVIWbbrVGI

Some of the local funds that chapters raise goes directly to National as part of chapter affiliation fees. And when you are the national founder, national board member with no term limits, and national executive director, you have immense power on how that money is spent- including buying yourself a brand new SUV, paying expensive DC lawyers to shut down staff efforts to unionize, hiring attorneys to harass and intimidate women who ask for equal pay and report abuse and sexual harassment, etc. Chapters are aware of the issues but look the other way and do nothing.

This review was posted to CAIR-New Jersey on 9/23 by the former executive director: "I do not recommend donating your money to CAIR-NJ. I believe there may be a warrant out for the arrest of a former CAIR-NJ board member, who served as this organization's treasurer, for stealing CAIR-NJ money by writing himself checks. Donors should definitely question whether their charity is legitimately being used to do civil rights advocacy, how this was allowed to happen, and whether the organization is being fully transparent. Full disclosure: I am a former Executive Director of CAIR-NJ and found the board leadership to be quite inadequate and corrupt at the expense of the community and even moreso at the expense of its staff."

CAIR creates more victims than it helps. It does more harm than good, whether it's the continuous negative portrayal of Muslims as victims in the media, lack of strategy, making serious mistakes on people's cases, providing inconsistent services, the all-male press conferences, failure to build a legitimate nationwide infrastructure, lack of community engagement on the national level, not having a seat at many tables despite being around for 25 years and having an office a few blocks from the US Capitol, and so much more.

Ultimately, nothing good can come out of corruption and injustice. The community deserves a legitimate civil rights and Muslim organization that treats all people with the respect and dignity they deserve.

REDACTED
REDACTED, As The Spirit Moves Us
Convener, Portland Spirit Led Justice Alliance
Project Director, Portland United Against Hate
They/Them pronouns
REDACTED
REDACTED
www.AstheSpiritMovesUs.com

Portland United Against Hate is building a rapid response system that combines reporting and tracking of hateful acts and providing the support and protection our communities need. If you believe you have experienced or witnessed a hate/bias incident you can report it through www.reporthatepdx.com

# **EXHIBIT "I"**

From: REDACTED

**Date:** March 4, 2020 at 5:48:53 PM EST

To: REDACTED

Subject: Re: Lori Haidri

Okay, now Lori is really going all out to troll me about CAIR.

She saw I had posted something on REDACTED page from a 2017 demo and she posted the statement there.

Then she saw I had a public post about abortion rights and she pasted it there.

Clearly I can spend all my time deleting shit but she's bent on continuing.

REDACT

On Mar 4, 2020, at 5:43 PM, REDACTED

> wrote:

So I just had this statement by Lori Haidri posted on a photo of you on my FB page from a Sept 2017 event (perhaps the opening of your office?):

-----

CAIR has serious issues of religious and gender discrimination, sexual abuse and exploitation, retaliation, union busting, hostile work environment, financial abuse and mismanagement- including losing their 501c3 and issues with their Washington Trust Foundation entity receiving international donations- board incompetence, tokenism, and more.

CAIR does more harm than good, whether it's the continuous negative portrayal of Muslims as victims in the media, lack of strategy, making serious mistakes on people's cases, the all-male press conferences, providing inconsistent services, lack of transparency around international funding sources and agendas, the embarrassing media spokespeople, failure to build a legitimate nationwide infrastructure, being a laughing stock on Capitol Hill despite having an office a few blocks from the U.S. Capitol, lack of community engagement on the national level, and, after 26 years, not having a seat at MANY tables (including the Leadership Conference on Civil and Human Rights, which brings together 200+ national civil rights organizations).

CAIR Sexism Documentation Project https://www.facebook.com/groups/2228298364100050/

Christian woman's employment discrimination lawsuit against CAIR chapter: https://www.docdroid.net/FjATdM9/onlinedocument.pdf...

Former CAIR executive director on financial abuse: "Donors should definitely question whether their charity is legitimately being used to do civil rights advocacy, how this [board member "writing himself checks"], was allowed to happen, and whether the organization is being fully transparent."

https://www.facebook.com/pg/CAIRNewJersey/reviews/?ref=page\_internal

As you're considering which nonprofits to support and donate to, please be diligent-do your research and ask the tough questions. Is your money really helping to empower people in the community who have been discriminated against, or are you empowering a multi-million dollar organization that discriminates against its own community and further victimizes people who seek their help? Is your money going to pay an attorney to fight for people's rights to practice their faith or is your money going to pay an attorney to suppress, silence, and intimidate those who have been treated unjustly? Are you supporting legitimate, sincere advocates for justice or those who support the status quo and cowardly look the other way when the injustice is committed by their own national leaders?

### CASE 0:21-cv-01267 Doc. 1-1 Filed 05/21/21 Page 54 of 87

#CAIR is a corrupt and unethical organization that does not speak for American Muslims. A true civil rights organization would treat all people with the respect and dignity they deserve.

\_\_\_\_\_

I then private messaged her and told her not to post statements on my FB page. She replied that I should care about partnering with an organization that doesn't care about rights.

I didn't respond.

Then she posted the statement above as a direct message on my FB page, but with the leading sentence "Your partnership with CAIR is troubling."

I deleted that and unfriended her.

I only met her (or spoke to her on the phone?) once or twice. The only reason I didn't unfriend her when she left CAIR was that I was curious about how her diatribe against you all would go.

Thought you'd want to know all this.

REDACT

# EXHIBIT ""

----- Forwarded message -----

From: Muslims Documenting Sexism<muslimsdocumenting@gmail.com>

Date: Mon, Oct 5, 2020 at 12:35 AM

Subject: CAIR partnership

To: <REDACTED >

Please, please don't partner with the Council on American-Islamic Relations (CAIR) or their chapters. We have documented a pattern of discrimination and abuse inside CAIR. These incidents were brought to the attention of CAIR's leadership and the National Council, a national entity made up of leaders from each chapter. Instead of investigating the issues and taking serious steps to remedy them, CAIR has threatened legal action to those who speak out publicly. This further victimizes and silences individuals.

Over 35 former employees and board members have alleged numerous issues inside CAIR, including:

- Gender discrimination
- Sexual harassment and sexual exploitation
- Religious discrimination
- Retaliation
- Interference with staff efforts to unionize/union busting
- Hostile work environment
- Board incompetence and lack of board oversight
- Tokenism
- Financial abuse and mismanagement (Examples: the former accountant stole funds; lost 501c3 for not filing 990s over several consecutive years; lack of transparency around their Washington Trust Foundation entity receiving international donations that are funneled to CAIR; brand new SUV and monthly insurance payments for executive director/founder/board member).

A prominent Muslim community leader, and former CAIR-New Jersey executive director, shared his

### CASE 0:21-cv-01267 Doc. 1-1 Filed 05/21/21 Page 57 of 87

experience: "I do not recommend donating your money to CAIR-NJ. I believe there may be a warrant out for the arrest of a former CAIR-NJ board member, who served as this organization's treasurer, for stealing CAIR-NJ money by writing himself checks. Donors should definitely question whether their charity is legitimately being used to do civil rights advocacy, how this was allowed to happen, and whether the organization is being fully transparent. Full disclosure: I am a former Executive Director of CAIR-NJ and found the board leadership to be quite inadequate and corrupt at the expense of the community and even moreso at the expense of its staff."

SEE: https://www.facebook.com/pg/CAIRNewJersey/reviews/?ref=page\_internal

There are many people who have been directly harmed by CAIR. The CAIR Sexism Documentation Project is a group of mostly women who share their experiences of facing discrimination at CAIR. SEE: https://www.facebook.com/groups/2228298364100050/

Despite efforts to intimidate and silence women, there have been several lawsuits against CAIR. In 2019, a major employment discrimination lawsuit was filed against CAIR-California. This case was settled and the CAIR-San Diego executive director is no longer employed there. SEE: https://www.docdroid.net/FjATdM9/onlinedocument.pdf?fbclid=IwAR1uMMCaznSystmODEn10p y3\_qHMJsye9r4fkLKCYyecJ4dYzKVIWbbrVGI

Unfortunately, CAIR does more harm than good, whether it's the continuous negative portrayal of Muslims as victims in the media, lack of strategy, making serious mistakes on people's cases, the Muslim Ban lawsuit fiasco, the all-male press conferences, providing inconsistent services, lack of transparency around international funding sources and agendas, the embarrassing media spokespeople, failure to build a legitimate nationwide infrastructure, being a laughing stock on Capitol Hill despite having an office a few blocks from the U.S. Capitol, lack of community engagement on the national level, and, after 26 years, not having a seat at MANY tables- including the Leadership Conference on Civil and Human Rights, which brings together 200+ national civil rights organizations.

Please be diligent- do your research and ask the tough questions. Are you really helping to empower people in the community who have been discriminated against, or are you empowering a multimillion dollar organization that discriminates against its own community and further victimizes people who seek their help? Are you fighting for people's rights to practice their faith or are you going to help suppress, silence, and intimidate women who have been treated unjustly? Are you supporting legitimate, sincere advocates for justice or those who support the status quo and look the other way when the injustice is committed by their own national leaders?

Powered by AT&T Wireless. Please excuse typos and brevi
—- end —-
Thank you for listening.
Please don't give CAIR, or their chapters, a platform.

REDACTED, CAIR Office in Maryland Council on American-Islamic Relations 6120 Baltimore National Pike, Suite 2D Baltimore, MD 21228 Website: www.cair.com

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Office: REDACTED
Cell: REDACTED
Fax: REDACTED

Pronouns: She/Her/Hers

CAIR is America's largest Muslim civil liberties and advocacy organization. Its vision is to be a leading advocate for justice and mutual understanding. Its mission is to enhance the understanding of Islam, protect civil rights, promote justice, and empower American Muslims.

### CONFIDENTIALITY WARNING

This electronic and/or physical message contains information which may be privileged and/or confidential. This information is intended for the exclusive use of the individual(s), entity, or persons named or indicated above. Any unauthorized access, disclosure, copying, distribution, or use of any parts of the contents of this message/information is strictly prohibited by federal law. Any attempts to intercept this message are a direct violation of Title 18 U.S.C. 2511(1) of the Electronic Communications Privacy Act (ECPA). All violators are subject to fines, imprisonment or civil damages, or both. If you receive this communication in error, please notify us and destroy the original electronic message and/or any physical copies. Any advice given in this correspondence should not be considered legal advice and may not apply to your situation.

# EXHIBIT " "

From: Pacific Northwest Family Circle <pnwfamilycircle@gmail.com>

Sent: Monday, October 5, 2020 1:50:58 PM

To: REDACTED @cair.com>

Subject: Fwd: CAIR partnership

FYI. This looks like a pretty wild smear campaign.

This email address is shared by:

# **REDACTED**

Pacific Northwest Family Circle Instagram: @pnwfamilycircle Twitter: @PNWFamilyCircle www.pnwfamilycircle.org

This email is sent In Loving Memory of PNWFC Loved Ones and All Stolen Lives:

- 19 year-old REDACTED
- 22 year-old REDACTED
- 25 year-old REDACTED
- 17 year-old REDACTED
- 24 year-old REDACTED
- 27 year-old REDACTED
- 21 year-old REDACTED
- 27 year-old REDACTED
- 29 year-old REDACTED
- 49 year-old REDACTED
- (alive) REDACTED
- (alive) REDACTED
- 44 year-old REDACTED
- 54 year-old REDACTED
- 48 year-old REDACTED
- 43 year-old REDACTED
- 27 year-old REDACTED
- 35 year-old REDACTED
- 36 year-old REDACTED
- 20 year-old REDACTED
- 29 year-old REDACTED
- 31 year-old REDACTED
- 16 year-old REDACTED
- 29-year-old REDACTED
- 40 year-old REDACTED
- (alive) **REDACTED**

----- Forwarded message ------

From: Muslims Documenting Sexism < muslimsdocumenting@gmail.com>

Date: Mon, Oct 5, 2020 at 12:43 PM

Subject: CAIR partnership

To: < info@pnwfamilycircle.org>

Please, please don't partner with the Council on American-Islamic Relations (CAIR) or their chapters. We have documented a pattern of discrimination and abuse inside CAIR. These incidents were brought to the attention of CAIR's leadership and the National Council, a national entity made up of leaders from each chapter. Instead of investigating the issues and taking serious steps to remedy them, CAIR has threatened legal action to those who speak out publicly. This further victimizes and silences individuals.

Over 35 former employees and board members have alleged numerous issues inside CAIR, including:

- Gender discrimination
- Sexual harassment and sexual exploitation
- Religious discrimination
- Retaliation
- Interference with staff efforts to unionize/union busting
- Hostile work environment
- Board incompetence and lack of board oversight
- Tokenism
- Financial abuse and mismanagement (Examples: the former accountant stole funds; lost 501c3 for not filing 990s over several consecutive years; lack of transparency around their Washington Trust Foundation entity receiving international donations that are funneled to CAIR; brand new SUV and monthly insurance payments for executive director/founder/board member).

A prominent Muslim community leader, and former CAIR-New Jersey executive director, shared his experience: "I do not recommend donating your money to CAIR-NJ. I believe there may be a warrant out for the arrest of a former CAIR-NJ board member, who served as this organization's treasurer, for stealing CAIR-NJ money by writing himself checks. Donors should definitely question whether their charity is legitimately being used to do civil rights advocacy, how this was allowed to happen, and whether the organization is being fully transparent. Full disclosure: I am a former Executive Director of CAIR-NJ and found the board leadership to be quite inadequate and corrupt at the expense of the community and even moreso at the expense of its staff."

SEE: https://www.facebook.com/pg/CAIRNewJersey/reviews/?ref=page\_internal

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https://www.docdroid.net/FjATdM9/onlinedocument.pdf?fbclid=IwAR1uMMCaznSystmODEn10py3\_qHMJsye9r4fkLKCYyecJ4dYzKVIWbbrVGI

Unfortunately, CAIR does more harm than good, whether it's the continuous negative portrayal of Muslims as victims in the media, lack of strategy, making serious mistakes on people's cases, the Muslim Ban lawsuit fiasco, the all-male press conferences, providing inconsistent services, lack of transparency around international funding sources and agendas, the embarrassing media spokespeople, failure to build a legitimate nationwide infrastructure, being a laughing stock on Capitol Hill despite having an office a few blocks from the U.S. Capitol, lack of community engagement on the national level, and, after 26 years, not having a seat at MANY tables- including the Leadership Conference on Civil and Human Rights, which brings together 200+ national civil rights organizations.

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Please don't give CAIR, or their chapters, a platform.

Thank you for listening.

# EXHIBIT ""

From: Muslims Documenting Sexism <muslimsdocumenting@gmail.com>

Date: Wed, Nov 4, 2020 at 1:05 PM

Subject: Important- CAIR at your press conference

To: <REDACTED >

RE: <a href="https://www.cair.com/press\_releases/cair-to-join-count-every-vote-maryland-news-conference-to-call-on-lawmakers-to-ensure-fair-election/">https://www.cair.com/press\_releases/cair-to-join-count-every-vote-maryland-news-conference-to-call-on-lawmakers-to-ensure-fair-election/</a>

It's already an overwhelming day for many of us and thank you for the work you are doing to ensure accountability.

Please, please don't partner with the Council on American-Islamic Relations (CAIR) or their chapters. We ask you to investigate these issues.

We have documented a pattern of discrimination and abuse inside CAIR <a href="www.cair.com">www.cair.com</a>. These incidents were brought to the attention of CAIR's leadership and members of the National Council, a national entity made up of leaders from every chapter. Instead of investigating the issues and taking serious steps to remedy them, CAIR has threatened legal action against those who speak out. This further victimizes and silences individuals.

Over 35 former employees and board members have alleged numerous issues inside CAIR, including:

- Sexual harassment, abuse, and exploitation
- Gender discrimination
- Religious discrimination (Jewish, Shia Muslim, & Christian employees)
- Retaliation; hostile work environment
- Interference with staff efforts to unionize/union busting
- Tokenism
- Board incompetence and lack of board oversight
- Financial abuse and mismanagement

There are many people who have been directly harmed by CAIR. The CAIR Sexism Documentation Project is a support group for women, and a few men, to share their experience at CAIR. SEE: <a href="https://en-gb.facebook.com/groups/CAIRsexism/">https://en-gb.facebook.com/groups/CAIRsexism/</a>

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Many believe that the CAIR board does not provide proper oversight to the organization. CAIR's national founder is also the full-time paid executive director and a voting board member. He has allegedly been a voting board member for 25+ years and does not have a term limit.

The lack of board oversight has led to some serious issues inside CAIR:

- Lost 501c3 nonprofit status for not filing 990s over several consecutive years
- A former accountant stole funds and it took him over 10 years to reimburse the organization
- Brand new SUV and monthly insurance payments for the executive director/founder/board member
- CAIR is missing three years of financial statements, there are allegations that it was destroyed intentionally
- Lack of transparency around CAIR's Washington Trust Foundation (WTF) entity receiving
  international donations that are funneled to CAIR. WTF allegedly owns CAIR's multimillion dollar
  building on Capitol Hill in Washington, DC. CAIR's executive director/founder/board member
  signed 990s for both CAIR and WTF and is allegedly paid by both entities.

A prominent Muslim community leader, and former CAIR-New Jersey executive director, shared his experience at CAIR: "I do not recommend donating your money to CAIR-NJ. I believe there may be a warrant out for the arrest of a former CAIR-NJ board member, who served as this organization's treasurer, for stealing CAIR-NJ money by writing himself checks. Donors should definitely question whether their charity is legitimately being used to do civil rights advocacy, how this was allowed to happen, and whether the organization is being fully transparent. Full disclosure: I am a former Executive Director of CAIR-NJ and found the board leadership to be quite inadequate and corrupt at the expense of the community and even moreso at the expense of its staff."

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From 2016-2018, CAIR spent hundreds of thousands of dollars on attorney's fees to shut down staff efforts to unionize. No staff vote to unionize took place. All 7 employees who were leading the effort to unionize were either terminated or resigned. CAIR got away with union busting because the NLRB ruled that CAIR is a religious organization. Is CAIR really a religious organization or a civil rights organization?

Unfortunately, CAIR does more harm than good, whether it's the continuous negative portrayal of Muslims as victims in the media, lack of strategy, making serious mistakes on people's cases, the Muslim Ban lawsuit fiasco, the all-male press conferences, refusal to stand up for civil rights for all, lack of transparency around international funding sources and agendas, the embarrassing media spokespeople, failure to build a legitimate nationwide infrastructure, the one-person departments and offices, lack of influence on Capitol Hill despite having an office a few blocks from the U.S. Capitol, lack of community engagement nationally, and, after 26 years, not having a seat at MANY tables- including the Leadership Conference on Civil and Human Rights, which brings together 200+ national civil rights organizations. CAIR needs to stop hiding behind Islamophobia and get its act together.

Please be diligent- do your research and ask the tough questions. Is the community really helping to empower people who have been discriminated against, or are they empowering a multi-million dollar organization that discriminates against its own community and further victimizes people who seek their help? Are their donations going to pay an attorney to fight for people's rights to practice their faith or are they instead paying an attorney to suppress, silence, and intimidate other Muslims (CAIR employees) who have been treated unjustly? Are they supporting competent and principled advocates for justice or those who support the status quo and look the other way when the civil rights abuse is taking place inside their own organization?

Due to personal safety concerns and legal threats from CAIR's attorneys, our group members need to remain anonymous. Thank you for your understanding. We trust that you will do a thorough investigation into these allegations.

## **EXHIBIT "M"**

From: Muslims Documenting Sexism <muslimsdocumenting@gmail.com>

**Date:** November 9, 2020 at 10:45:48 AM EST

To: "REDACTED " < REDACTED >

**Subject: Important- CAIR** 

\*\*\* External email - use caution \*\*\*

## Hello.

Your website states: "CAIR is a vital organization for American Muslims. We advocate for our community even in the most difficult of spaces. I am proud to serve through an organization that empowers our community to defend and protect the rights of anyone facing injustice in our country."

SEE: <a href="https://graydon.law/staff/roula-allouch/">https://graydon.law/staff/roula-allouch/</a>

Please investigate CAIR (Council on American-Islamic Relations/CAIR Foundation, Inc).

We have documented a pattern of discrimination and abuse inside CAIR <a href="www.cair.com">www.cair.com</a>. These incidents were brought to the attention of CAIR's leadership and the National Council, a national entity made up of leaders from every chapter. Instead of investigating the issues and taking serious steps to remedy them, CAIR has threatened legal action against those who speak out. This further victimizes and silences individuals.

Over 35 former employees and board members have alleged numerous issues inside CAIR, including:

- Sexual harassment, abuse, and exploitation
- Gender discrimination
- Religious discrimination (Jewish, Shia Muslim, & Christian employees)
- Retaliation: hostile work environment

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- Interference with staff efforts to unionize/union busting
- Tokenism
- Board incompetence and lack of board oversight
- Financial abuse and mismanagement

There are many people who have been directly harmed by CAIR. The CAIR Sexism Documentation Project is a support group for women, and a few men, to share their experience at CAIR. SEE: <a href="https://en-gb.facebook.com/groups/CAIRsexism/">https://en-gb.facebook.com/groups/CAIRsexism/</a>

Despite efforts to intimidate and silence women, there have been several lawsuits against CAIR. In 2019, an employment discrimination lawsuit was filed against CAIR-California for gender discrimination. This case was settled and the CAIR-San Diego executive director is no longer employed there. SEE: <a href="https://www.docdroid.net/FjATdM9/onlinedocument.pdf?fbclid=IwAR1uMMCaznSystmODEn10py3">https://www.docdroid.net/FjATdM9/onlinedocument.pdf?fbclid=IwAR1uMMCaznSystmODEn10py3</a> qHMJsye9r4fkLKCYyecJ4dYzKVIWbbrVGI

Many believe that the CAIR board does not provide proper oversight to the organization. CAIR's national founder is also the full-time paid executive director and a voting board member. He has allegedly been a voting board member for 25+ years and does not have a term limit.

The lack of board oversight has led to some serious issues inside CAIR:

- Lost 501c3 nonprofit status for not filing 990s over several consecutive years
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- Brand new SUV and monthly insurance payments for the executive director/founder/board member
- CAIR is missing three years of financial statements, there are allegations that it was destroyed intentionally
- Lack of transparency around CAIR's Washington Trust Foundation (WTF) entity receiving international donations that are funneled to CAIR. WTF allegedly owns CAIR's multimillion dollar building on Capitol Hill in Washington, DC. CAIR's executive director/founder/board member signed 990s for both CAIR and WTF and is allegedly paid by both entities.

A prominent Muslim community leader, and former CAIR-New Jersey executive director, shared his experience at CAIR: "I do not recommend donating your money to CAIR-NJ. I believe there may be a warrant out for the arrest of a former CAIR-NJ board member, who served as this organization's treasurer, for stealing CAIR-NJ money by writing himself checks. Donors should definitely question whether their charity is legitimately being used to do civil rights advocacy, how this was allowed to happen, and whether the organization is being fully transparent. Full disclosure: I am a former Executive Director of CAIR-NJ and found the board leadership to be quite inadequate and corrupt at the expense of the community and even moreso at the expense of its staff."

SEE: https://www.facebook.com/pg/CAIRNewJersey/reviews/?ref=page\_internal

From 2016-2018, CAIR spent hundreds of thousands of dollars on attorney's fees to shut down staff efforts to unionize. No staff vote to unionize took place. All 7 employees who were leading the effort to unionize were either terminated or resigned. CAIR got away with union busting because the NLRB ruled that CAIR is a religious organization. Is CAIR really a religious organization or a civil rights

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organization? They get grant funding from foundations as a civil rights organization, but shut down staff efforts to unionize as a religious organization.

Unfortunately, CAIR does more harm than good, whether it's the continuous negative portrayal of Muslims as victims in the media, lack of strategy, making serious mistakes on people's cases, the Muslim Ban lawsuit fiasco, the all-male press conferences, refusal to stand up for civil rights for all, lack of transparency around international funding sources and agendas, the embarrassing media spokespeople, failure to build a legitimate nationwide infrastructure, the one-person departments and offices, lack of influence on Capitol Hill despite having an office a few blocks from the U.S. Capitol, lack of community engagement nationally, and, after 26 years, not having a seat at MANY tables- including the Leadership Conference on Civil and Human Rights, which brings together 200+ national civil rights organizations. CAIR needs to stop hiding behind Islamophobia and get its act together.

Please be diligent- do your research and ask the tough questions. Is the community really helping to empower people who have been discriminated against, or are they empowering a multi-million dollar organization that discriminates against its own community and further victimizes people who seek their help? Are their donations going to pay an attorney to fight for people's rights to practice their faith or are they instead paying an attorney to suppress, silence, and intimidate other Muslims (CAIR employees) who have been treated unjustly? Are they supporting competent and principled advocates for justice or those who support the status quo and look the other way when the civil rights abuse is taking place inside their own organization?u

There is a pattern of abuse and discrimination against employees at CAIR that requires your immediate attention and intervention.

Due to personal safety concerns and legal threats from CAIR's attorneys, our group members prefer to remain anonymous. Thank you for your understanding. We trust that you will do a thorough investigation into these allegations. Please let us know how we can help.

# EXHIBIT " "

On Sun, Nov 15, 2020 at 5:12 AM Florida Council of Churches < REDACTED

> wrote:

We are sorry for your experience.

Our experience has been of the highest ethical standard over several years. It cannot be invalidated in this manner.

Peace be with you!

The Florida Council of Churches

On Sat, Nov 14, 2020, 9:03 PM Muslims Documenting Sexism < <a href="mailto:muslimsdocumenting@gmail.com">muslimsdocumenting@gmail.com</a> wrote:

RE: <a href="https://www.eventbrite.com/e/combating-anti-blackness-in-our-faith-communities-tickets-120486748107">https://www.eventbrite.com/e/combating-anti-blackness-in-our-faith-communities-tickets-120486748107</a>

You're doing amazing work and this is such an important topic, but please, please don't partner with the Council on American-Islamic Relations (CAIR) or their chapters. We ask you to investigate these issues.

We have documented a pattern of discrimination and abuse inside CAIR. These incidents were brought to the attention of CAIR's leadership and members of the National Council, a national entity made up of leaders from every chapter. Instead of investigating the issues and taking serious steps to remedy them, CAIR has threatened legal action against those who speak out. This further victimizes and silences individuals.

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- Retaliation; hostile work environment
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There are many people who have been directly harmed by CAIR. The CAIR Sexism Documentation Project is a support group for women, and a few men, to share their experience at CAIR. SEE: https://en-gb.facebook.com/groups/CAIRsexism/

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SEE: <a href="https://www.docdroid.net/FjATdM9/onlinedocument.pdf?fbclid=lwAR1uMMCaznSystmOD">https://www.docdroid.net/FjATdM9/onlinedocument.pdf?fbclid=lwAR1uMMCaznSystmOD</a> En10py3\_qHMJsye9r4fkLKCYyecJ4dYzKVIWbbrVGI

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Please be diligent- do your research and ask the tough questions. Is the community really helping to empower people who have been discriminated against, or are they empowering a multi-million dollar organization that discriminates against its own community and further victimizes people who seek their help? Are their donations going to pay an attorney to fight for people's rights to practice their faith or are they instead paying an attorney to suppress, silence,

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and intimidate other Muslims (CAIR employees) who have been treated unjustly? Are they supporting competent and principled advocates for justice or those who support the status quo and look the other way when the civil rights abuse is taking place inside their own organization?
Due to personal safety concerns and legal threats from CAIR's attorneys, our group members need to remain anonymous. Thank you for your understanding. We trust that you will do a thorough investigation into these allegations.

# EXHIBIT " "

## Begin forwarded message:

**From:** Muslims Documenting Sexism <muslimsdocumenting@gmail.com>

Date: December 18, 2020 at 12:34:03 PM EST

To: REDACTED

**Subject: Important- CAIR partnership** 

RE: <u>Video: CAIR, Community Partners Host Anne Arundel County</u> Forum to End Hate - YouTube

## Hello.

You are doing important work and this is a very important topic. We want to bring this information to your attention concerning your partnership with the Council on American Islamic Relations (CAIR).

CAIR does not speak for American Muslims and many will tell you that they only show up for the media. They are good at sending press releases and jumping on current events, but this does not translate into actual work and credibility in the community.

We don't trust them to provide accurate information. For example, if you look at the national office's annual civil rights report, the number of reported hate crimes and discrimination cases in each state will sometimes differ than what the CAIR state office reports in their local annual report. We don't know if this is a result of exaggeration, mismanagement, or miscommunication.

What we do know is that there are trust, credibility, accuracy, and fairness issues when it comes to quoting CAIR in the media as a legitimate source or partnering with them. We urge you to investigate the serious allegations below.

We have been harmed by CAIR and we are seeking real reform and change inside the nation's largest Muslim civil rights organization. Our goal is to stop the nation's largest Muslim civil rights organization from being the perpetrator of civil rights abuses against some of the most vulnerable and marginalized people in our community. CAIR chapters must address serious civil rights issues inside their own organization and hold their leaders accountable. We are asking you to investigate and do your own research.

We have documented a pattern of discrimination and abuse inside CAIR www.cair.com. These incidents were brought to the attention of CAIR's leadership and the National Council, a national entity made up of leaders from every chapter. Instead of investigating the issues and taking serious steps to remedy them, CAIR has threatened legal action against those who speak out. This further victimizes and silences individuals.

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SEE: <a href="https://www.docdroid.net/FjATdM9/onlinedocument.pdf?fbclid=lwAR1uMMCaznSystmODEn10py3\_qHMJsye9r4fkLKCYyecJ4dYzKVIWbbrVGI">https://www.docdroid.net/FjATdM9/onlinedocument.pdf?fbclid=lwAR1uMMCaznSystmODEn10py3\_qHMJsye9r4fkLKCYyecJ4dYzKVIWbbrVGI</a>

Many believe that the CAIR board does not provide proper oversight to the organization. CAIR's national founder is also the full-time paid executive director and a voting board member. He has allegedly been a voting board member for 25+ years and does not have a term limit.

The lack of board oversight has led to some serious issues inside CAIR:

- Lost 501c3 nonprofit status for not filing 990s over several consecutive years
- A former accountant stole funds and it took him over 10 years to reimburse the organization
- Brand new SUV and monthly insurance payments for the executive director/founder/board member
- CAIR is missing three years of financial statements, there are allegations that it was destroyed intentionally
- Lack of transparency around CAIR's Washington Trust Foundation (WTF) entity receiving international donations that are funneled to CAIR. WTF allegedly owns CAIR's multimillion dollar building on Capitol Hill in Washington, DC. CAIR's

## CASE 0:21-cv-01267 Doc. 1-1 Filed 05/21/21 Page 77 of 87

executive director/founder/board member signed 990s for both CAIR and WTF and is allegedly paid by both entities.

A prominent Muslim community leader, and former CAIR-New Jersey executive director, shared his experience at CAIR: "I do not recommend donating your money to CAIR-NJ. I believe there may be a warrant out for the arrest of a former CAIR-NJ board member, who served as this organization's treasurer, for stealing CAIR-NJ money by writing himself checks. Donors should definitely question whether their charity is legitimately being used to do civil rights advocacy, how this was allowed to happen, and whether the organization is being fully transparent. Full disclosure: I am a former Executive Director of CAIR-NJ and found the board leadership to be quite inadequate and corrupt at the expense of the community and even moreso at the expense of its staff."

SEE: <a href="https://www.facebook.com/pg/CAIRNewJersey/reviews/?ref=page\_internal">https://www.facebook.com/pg/CAIRNewJersey/reviews/?ref=page\_internal</a>

From 2016-2018, CAIR spent hundreds of thousands of dollars on attorney's fees to shut down staff efforts to unionize. No staff vote to unionize took place. All 7 employees who were leading the effort to unionize were either terminated or resigned. CAIR got away with union busting because the NLRB ruled that CAIR is a religious organization. Is CAIR really a religious organization or a civil rights organization?

Unfortunately, CAIR does more harm than good, whether it's the continuous negative portrayal of Muslims as victims in the media, lack of strategy, making serious mistakes on people's cases, the Muslim Ban lawsuit fiasco, the all-male press conferences, refusal to stand up for civil rights for all, lack of transparency around international funding sources and agendas, the embarrassing media spokespeople, failure to build a legitimate nationwide infrastructure, the one-person departments and offices, lack of influence on Capitol Hill despite having an office a few blocks from the U.S. Capitol, lack of community engagement nationally, and, after 26 years, not having a seat at MANY tables- including the Leadership Conference on Civil and Human Rights, which brings together 200+ national civil rights organizations. CAIR needs to stop hiding behind Islamophobia and get its act together.

Please be diligent- do your research and ask the tough questions. Is the community really helping to empower people who have been discriminated against, or are they empowering a multi-million dollar organization that discriminates against its own community and further victimizes people who seek their help? Are their donations going to pay an attorney to fight for people's rights to practice their faith or are they instead paying an attorney to suppress, silence, and intimidate other Muslims (CAIR employees) who have been treated unjustly? Are they supporting competent and principled advocates for justice or those who support the status quo and look the other way when the civil rights abuse is taking place inside their own organization?

Due to personal safety concerns and legal threats from CAIR's attorneys, our group members need to remain anonymous. Thank you for your understanding. We trust that you will do a thorough investigation into these allegations.

# EXHIBIT ""

From: Muslims Documenting Sexism <muslimsdocumenting@gmail.com>

Date: April 29, 2021 at 2:41:33 PM EDT

To: REDACTED

Subject: Your partnership with CAIR is hurtful

Assalamualaikum.

Thank you for the important work you do, especially during current challenging times.

Please don't provide the Council on American Islamic Relations (CAIR) and their chapters publicity and partnership. The "nation's largest Muslim civil rights organization" is a major violator of civil rights and does not speak for American Muslims. CAIR is not a suitable partner for the important work you do to create inclusive, safe spaces.

## There is a history of sexual abuse, gender discrimination, and sexual harassment inside CAIR.

SEE: Civil Rights Org CAIR Accused of Ignoring Alleged Misconduct (NPR) <a href="https://www.npr.org/2021/04/15/984572867/muslim-civil-rights-leader-accused-of-harassment-misconduct">https://www.npr.org/2021/04/15/984572867/muslim-civil-rights-leader-accused-of-harassment-misconduct</a>

SEE ALSO: Women's Coalition Demands CAIR's Civil Rights Leader Nihad Awad Resign After NPR Exposes his Failure to Address Pervasive Sexual Harassment, Discrimination and Gender Bias <a href="https://docdro.id/LYNVH4n">https://docdro.id/LYNVH4n</a>

Hassan Shibly: Prominent Muslim-American Figure Accused Of Domestic Abuse (Morocco World News)

https://www.moroccoworldnews.com/2021/01/333783/hassan-shibly-prominent-muslim-american-figure-accused-of-domestic-abuse/

CAIR-Florida's Executive Director Resigns After Wife Sues For Domestic Violence Injunction (WMFE)

https://www.wmfe.org/cair-floridas-executive-director-resigns-after-wife-sues-for-domestic-violence-injunction/173386

There are dozens of former, mainly Muslim female staff who have been victimized by CAIR leaders and had their civil rights violated by an organization that obtains funding to protect those same rights. CAIR, as the nation's largest Muslim civil rights organization, is accused of the following misconduct:

- 1. Sexual harassment, abuse, and exploitation
- 2. Gender discrimination
- 3. Religious discrimination (Shia Muslim, Jewish, & Christian employees)
- 4. Toxic and hostile work environment
- 5. Brutal retaliation against efforts to unionize/union busting
- 6. Board incompetence and lack of board oversight
- 7. Financial abuse and mismanagement

## CASE 0:21-cv-01267 Doc. 1-1 Filed 05/21/21 Page 80 of 87

CAIR has pressured women into signing oppressive NDAs and used hundreds of thousands of dollars of donation funds to legally harass or pay off and silence victims.

- **1. CAIR and Sexual exploitation of women:** Several efforts have emerged in recent weeks to document issues of abuse and discrimination at CAIR:
  - · CAIR Victims Forum (Instagram)
  - · CSDocuProject (Twitter)
  - · An Open Letter to CAIR Banquet Speakers

## 2. CAIR and violating workers employment rights:

- · 2019, an employment discrimination lawsuit was filed against CAIR-California. The lawsuit alleges official organizational policies that discriminate against certain employees, as well as a pattern of long-tolerated abuse. This case was settled and the CAIR-San Diego executive director is no longer employed there.
- · Jan 8 2021 a <u>second employment discrimination lawsuit</u> was filed against CAIR-California alleging gender discrimination.
- · In 2017 CAIR National viciously <u>retaliated</u> against staff (mainly women) for attempting to unionize: SEIU Local 500 wrote: <u>"Disappointed that a civil rights group like #CAIR is trying to stop it's employees from even voting on having a union"</u>

The allegations are that not only did CAIR allow a culture of sexual harassment and gender inequality to prevail within the context of a generally toxic work environment in its own head office - but it also actively supported such practices/cultures in many local chapters.

We are asking you to do the right thing and stand in solidarity with Muslim sisters who have been sexually exploited and had their civil rights violated by CAIR leaders- with zero accountability.

Please note that more media stories will be emerging in the coming weeks and we don't want your organization to come under fire for supporting an organization that is known to be using hundreds of thousands of dollars of zakat and sadaka jaria funds to allegedly threaten and silence these women.

Local chapters are closely affiliated to the national headquarters and even pay a percentage of their annual revenue to CAIR National and share resources and communication guidelines.

We care about victims of abuse, discrimination, and harassment. WeCAIR.

Website: <a href="https://wecair.net">https://wecair.net</a> Email: wecair@protonmail.com

Twitter: https://twitter.com/WeCAIRCoalition

*Instagram:* https://www.instagram.com/cairvictimsforum

# EXHIBIT " "



Q Search this website

# Why did more than 120 members of Congress send congratulations letters to designated terrorist group CAIR on its 25th anniversary?

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According to Council of American-Islamic Relations (CAIR),
"120+" members of Congress sent the Muslim Brotherhoodlinked organization letters "welcoming" their 25th
anniversary gala scheduled for November 9 at the Grand
Hyatt hotel in Washington, D.C.

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CONSERVATIVE
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Carson's Over-The-Counter Memory Drug Hits Market

The Shocking Link Between Sex and Cancer

Drinking THIS Before 10AM Burns 1LB a Day? Deadly Sex Mistake: The Life-Saving Reason You Should Have Sex...



Clarion Project (h/t Linda R) CAIR describes liself as "America's largest Islamic civil liberties group," but in 2007, the U.S. government labeled CAIR an unindicted co-conspirator in the trial of the Holy Land Foundation for financing the Hamas terrorist

In November 2014, CAIR was designated as a terrorist organization by the United Arab Emirates along with a host of other Muslim Brotherhood entities.

CAIR was <u>listed</u> among "individuals/entities who are/were members of the U.S. <u>Muslim Brotherhood</u>'s Palestine Committee and/or its organizations." The Palestine Committee is a secret body set up to advance the Brotherhood/Hamas agenda.

The FBI subsequently severed official contacts with the group, saying it "does not view CAIR as an appropriate liaison partner."

The announcement by CAIR of this support by members of Congress follows accusations by former employees of CAIR's discriminatory and sexist practices and alleges a culture of abuse with the organization.

Lori Haidri, a former employee of the <u>Council of American-Islamic Relations</u> (CAIR), made the accusations in the following Facebook post:













w to Make a Beer Keg Out of a Pumpkin





Privacy - Terms



Algemeiner CAR's mission statement makes no mention of Palestine. Instead, it says it aims to "enhance understanding of Islam, protect civil rights, promote justice, and empower American Muslims." It describes its toblying aim as fousing 'on issues related to Islam and Muslims. The department monitors legislation and current activities and responds on behalf of the American Muslim community.

But a review of CAIR's activities shows a significant amount of time is spent on pushing Date if every of CAR's activities shows a significant anitotic or mire is sperit or posting Palestinian narratives, while never addressing Hamas's obsession with <u>pursuing</u> <u>terrorism</u> at the expense of Palestinian civi

That's especially true in <u>limes of conflict</u>, CAFR also routinely <u>leams</u> with groups <u>devoled</u> to <u>opposing</u> Israefs very existence. It should not be surprising to those familiar with CAFR origin story, It was created by a Muslim Brotherhood-run Hamas support network in the United States. Witnesses <u>lott the FBI</u> that supporting Hamas was its mission from the start.

CAIR officials also have spent years casting the FBI as an imminent threat to the Muslim community, <u>depicting agents</u> as dark figures turking outside their doors, as <u>willing to threaten</u>. Ite and even break the law just to set up innocent Muslims, and as <u>cold-blooded murderers</u>. CAIR <u>reflexively (dismisses</u> counter-terrorism indictments as

The Investigative Project on Terrorism obtained a copy of the booklet containing the letters mostly from Democrats and Democrat presidential candidates, which can be seen <a href="https://democrats-to-the-project-t



to make America great again

### 223068618

#### TOP POSTS

Spanish Soldiers caught throw Muslim invaders into the sea

violently attack Jews eating at a restaurant

bagel restaurant on Manhattan's Upper East Side

get into a wild screaming match after Geraldo condemns Israel and defends Palestinian terrorists

"If the children need to die, they'll die," says Gaza

Did you know that Joe Biden plagarized that line about the Coast Guard and Navy from Ronald

DEMOCRAT attitudes about the Hamas atta on Israel: "F\*ck the Jews, they'll vote for us

Not only is Joe Biden underwriting the Hamas attacks on Israel with hundreds of millions of dollars in funding, he is getting ready to release billions of dollars to Iran to finish the job

Guard graduates for their lack of applause at his

#### ARCH**I**VES

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#### RECENT COMMENTS

BareNakedIslam on NYC: Jews attacked by Muslim gang in front of bagel restaurant on Manhattan's Upper East Side

milk sheikh on NYC: Jews attacked by Muslim gang in front of bagel restaurant on Manhattan's Upper East Side

J mish on FOX NEWS: Geraldo Rivera and Dan Bongino get into a wild screaming match after Geraldo condemns Israel and defends Palesti

in front of bagel restaurant on Manhattan's Uppe East Side

and Dan Bongino get into a wild screaming match after Geraldo condemns Israel and defends Palestinian terrorists

BareNakedjsjam on FOX NEWS: Geraldo Rivera after Geraldo condemns Israel and defends

BareNakedIslam on Senator Tim Scott slams The Washington Post for a story criticizing Israel's Iron Dome missile defense system

BareNakedislam on FOX NEWS: Geraldo Rivera and Dan Bongino get into a wild screaming match after Gerajdo condemns [srae] and defends Palestinian terrorists

Muslim gang in front of bagel restaurant on Manhattan's Upper East Side

BareNakedIslam on FOX NEWS: Geraldo Rivera and Dan Bongino get into a wild screaming match after Geraldo condemns Israel and defends

David Grisez on FOX NEWS: Geraldo Rivera and

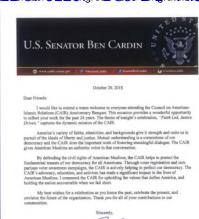
Fear the Legion on <u>Did you know that Joe Bider</u> plagiarized that line about the Coast Guard and Navy from Ronald Reagan? Dan Bongino get into a wild screaming match

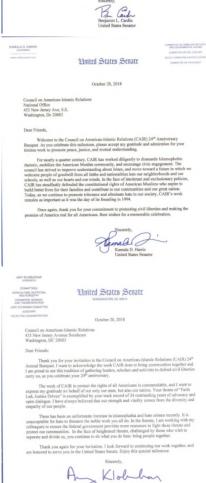
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Control States Schiller	
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FIGHARD BLUMENTHAL UNITED STATES SCHATOR	
CALLED STATES SCHATOR	
September 20, 2018	
Council on American-Islamic Relations National Office	
453 New Jersey Avenue, 8.H. Washington, D.C. 20003	
the second section of the sect	
Dear Friends,	
I am pleased to join you in celebrating twenty-four years of community service, ci engagement, and unity. With this year's theme, "Fulth Led, Justice Driven," the Council	vic:
continues its extraordinary mission of promoting dialogue and understanding among peop	ile of
all faiths.	
The Council's work to uphold the value of justice and tolerance, both in Connection across the country, is admirable and more critical than ever today as hate groups become	out and
emboldened and incidents of hate crimes increase. There been proud to stand with CAB	t-CT
and other faith based groups speaking out against hate speech, bias based crimes and other that seek to divide us.	racts
To preserve our democracy, the constitutional rights of people of all faiths and	
backgrounds should be protested.	
I congratulate the Council on over two decades of excellence, and I send my best	wishes
for the success of your 24th Anniversary Celebratory Bunquet.	
- Control	
Richard Oleman Red	
Richard Blumenthal	
Richard Blumenthel United States Senator	
CORY A. BUGKER NESS JUBERY	
700	
UNITED STATES SENATE WASHINGTON, D. C. HODIO	
October 20, 2018	
Council on American-Islamic Relations	
National Office 453 New Jersey Ave, S.E.	
Washington, D.C. 20003	
Dear Friends,	
It is a pleasure to extend my warmest greetings as you gather to celebrate the Council or American-Islamic Relations' 24th Anniversary.	1
Since its inception, the Council on American-Islamic Relations has been a committed at for the American Muslim community and sought to support the freedom of religion and	the
freedom of expression, both of which are cherished American values established in our sacred documents. I applaud your work and programming in the fight against discrimina	TREAT
all forms.	
Like many of you gathered here at the 2018 Celebratory Banquet, I have sought to find	ways to
bring people together. Like you, I have worked to find common ground to tackle our rati greatest challenges, protect civil rights, promote the advancement of justice, and empsor	ton's
most vulnerable among us.	
The tireless efforts of the many who are here in this room tonight, and the many who are us this evening, serve as an inspiration to all of those who wish to end higotry. Your for	not with
educate and build bridges among people are a testament to the truth of America: that we	are a
more powerful, more socure, and more just ration when we celebrate and embrace our d	
As you reflect on and celebrate all that you have accomplished, I wish you a joyous and mamorable evening.	
Sincarely,	
1 5.8	
( )	
Cory A. Booker United States Senator	







And letters from the 3 Republican traitors

Pelestinan terrorists
Reaffreedom/Fighter on LOS ANGELES: Proc. Harmas And Multims violently attack Jews entiting at a restaurant
Linda Rivera on EOX NEWS. Geratio Rivera and Dan Booging out into a wild screening match after Geratio Londonna torontal series and defends Pelestinan terrorists

CAIGGORES

Select Category

BIOGROUL

ACLL

American Freedom LevCenter

Acceptation Musims
Ayana Hiral All
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British First

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Creeging Sharia

Faith Freedom
Family Security Matters

Florida Family Assoc.

Hattory Scopar

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Liberty SB

Pamela Geller

Red Fox Bjooger

Refuges Settlement/Watch

Sharia Crime Stoppers

The Linked West

The Bojcon/Peace
Thomas More Lew

Villed Teres

Will Bill for America



Senator Thom Till North Carolina



October 20, 2018

Council on American Islamic Relations 453 New Jersey Avenue SE Washington, D.C. 20003

Dear Friends,

I am pleased to extend my best wishes to everyone gathered at the Council on American Islamic Relations' 2018 Celebratory Banquet. While my Senate schedule prevents me from attending today's event, I would like to congratulate the Council on 24 years of dedication to the vision of justice and mutual understanding.

Religious freedom is foundational to the American system of government and has rightly been called our "first freedom." Our nation proudly cheriahes the freedom of religion where all are free to peaceably practice, teach, and observe their faiths.

I appreciate the work that you do in educating, uniting, and defending civil liberties, and I wish you all the best for a wonderful celebration.





Rodry Dais

ng a truly excellent example of how education, service, and humanitarianism can lead to such

CAIR is our nation's largest Mealim civil liberties and advocacy organization and has been an integral part of empowering Mealinn across the country to engage in political and socia activism. Through obstaction and outroach, CAIR has enlighteend many on the values and maintaines of American Mealins, while also definding the constitutional rights of fosce

FILED UNDER: CAIR NAZIS

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Blacksmith 'Proves' 9/11 Conspiracy Theorists Are farkle The Best Steeping Positio Improving Your Health

COMMENTS





It's split right down party line, except for the 3 traitor Republicans. These Demoncraps are just mindless robots being paid off by CAIR, Satan himself has the 'Craps by the tail & they don't even know or give a shift.



Its rather obvious as to why they had this gathering in DC as they wish to shove this fascist religious cult right in the faces of the American people daring us to call them out on their evil ideology whereupon they can then scream at us and call us racist etc. They know how to play this game better than we do because they are like snakes in the grass, hiding in plain sight, blending into the culture waiting, just waiting, for the time

us.

I have lived among people who were born into the islamic nonsense and even if they dont practice devoutly they still protect islam from any criticism as they are brainwashed to do

so. I could tell you stories you would not believe.



Reply



Every one of these traitors should be prosecuted for treason for supporting an America hating, Israel hating, Jew hating, Christian hating Hamas front group MUSLIM TERRORIST Organization. DIRTY DEMONIC TRAITORS.

Marcus Tullius Cicero (106-43 B.C.) Roman Statesman, Philosopher and Orator

"A nation can survive its fools, and even the ambitious. But it cannot survive treason from

An enemy at the gates is jess formidable, for he is known and carries his banner openly, But the traitor moves amongst those within the gate freely, his sly whispers rustling through all the alleys, heard in the very halls of government itself.

For the traitor appears not a traitor, he speaks in accents familiar to his victims, and he wears their face and their arguments, he appeals to the baseness that lies deep in the hearts of all men.

He rots the soul of a nation, he works secretly and unknown in the night to undermine the pillars of the city, he infects the body politic so that it can no longer resist. A murderer is less to fear.

The traitor is the plague."



Where to I acquire a complete list of the traitors (dems and reps alike), TIA,

Reply



https://www.investigativeproject.org/documents/1002-2018-letters-of-support-forcair.pdf

Reply



That jackass Seth Moulton from my district in Marxachusetts is one of them. He entered the Dumbo-crat presidential race for about 5 minutes till he figured out no one cares. Did his announcement vid on the cliffs overlooking our harbor, too bad he didn't fall off them. I will send his office some infor (via JihadWatch) on his precious thugs and goons at CAIR, not that it will make any difference.



Why did they do that? Simple, It just shows they have never read the koran, have no knowledge of history, and are monumentally stupid-and terrified of islam.

Reply



There are way too many utterly stupid people in Congress! They are not doing their job of serving the people. God help us! We can't fix stupid, but we can vote them out of office

Reply



WA.	October 27, 2019 at 6:13 pm
repub's	need to know in these districts can quit guessing about which closet these twere hiding in timely for them to come out and kiss cair's ass now we all ks to BNI
Reply.	
	Brian says October 27: 2019 at 5:27 pm
	st NEEDS a purge!!!!! We need to remove all muslims and those who pande hey are ALL treasonous!
Reply.	
	AnnChristine says
<u></u>	October 27, 2019 at 4:16 pm
Why is	October 27, 2019 at 4:16 pm it necessary to grovel to Islam ????

ELATE A RES ET DOT NO MORE TIME ONE EPICTER COMMENT

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## CASE 0:21-cv-02367LPco $\sqrt{\frac{1}{12}}$ RFs/PAC-025/21/21 Page 1 of 1

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS CAIR FOUNDATION, INC., d/b/a COUNCIL ON AMERICAN-ISLAMIC RELATIONS & CAIR					HAIDF		OYA a.k.a. LOR ORI HAIDRI-S			
(b) County of Residence of First Listed Plaintiff (EXCEPT IN U.S. PLAINTIFF CASES)				County of Residence of First Listed Defendant  (IN U.S. PLAINTIFF CASES ONLY)  NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.						
(c) Attorneys (Firm Name, A Carl E. Christensen, Esq. Christensen Law Office PLLC 800 Washington Ave. North, Ste. Minneapolis, MN 55401 (612) 82	Michael Rubin, F 704 10 South	er) J. Fortunato, Esq. / Cynthia B. M ortunato & Harbison P.C. Leopard Road A 19301 (610) 408-2005/2022	lorgan, Esq.	Attorneys (If Know	wn)					
II. BASIS OF JURISD	ICTION (Place an "X" in	One Box Only)	III. CI	TIZENSHIP OF	PRIN	NCIPA	L PARTIES	Place an "X" in	One Box fo	r Plaintiff
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