



**Program
on Extremism**

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**American Muslims for
Palestine faces new legal
challenges**

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Introduction

Over the last few days, there have been several important legal developments related to American Muslims for Palestine (AMP), with severe challenges brought against it both at the federal and state level. The controversial organization presents itself as focused on education and advocacy within the Muslim community but has been under the spotlight since the October 7, 2023 attacks in Israel for its pro-Hamas rhetoric and its role in protests and rallies nationwide.¹ The measures, adopted respectively by the U.S. Department of Justice and the Circuit Court of the City of Richmond, are just the latest of a series of legal challenges facing AMP over the last two years.

What is AMP?

AMP, whose incorporated name is the Americans for Justice in Palestine (AJP) Educational Foundation,² was officially co-founded in 2006³ by Osama Abuirshaid and Hatem Bazian.⁴ Abuirshaid is a former employee of the Islamic Association for Palestine (IAP) and the United Association for Studies and Research (UASR). Bazian established the first Students for Justice in Palestine (SJP) chapter while working at the University of California, Berkeley.⁵

AMP's roots well pre-date its official incorporation. Arguments have been made in previous civil lawsuits suggesting that AMP is a continuation of IAP, an organization which has been publicly identified in federal court as the original Hamas propaganda

¹ Letter from Jason Smith, Chairman, House Committee on Ways and Means, to Daniel Werfel, IRS Commissioner, Sept. 24, 2024, and accompanying exhibits, pages 1-12 (referring "the Americans for Justice in Palestine Educational Foundation ("AJP Educational Foundation"), and American Muslims for Palestine ("AMP") for investigation and ultimately revocation of their tax-exempt status.") <https://waysandmeans.house.gov/wp-content/uploads/2024/09/Tax-Exempt-Status-Revocation-Letters.pdf>. See also "Ways and Means Chairman Smith Demands IRS Revoke Tax-Exempt Status of Organizations Fueling Chaos, Illegal Conduct, and Antisemitic Activity in U.S., Including those with Possible Ties to Terrorist Networks," Press Release, Sept. 24, 2024. <https://waysandmeans.house.gov/2024/09/24/ways-and-means-chairman-smith-demands-irs-revoke-tax-exempt-status-of-organizations-fueling-chaos-illegal-conduct-and-antisemitic-activity-in-u-s-including-those-with-possible-ties-to-terrorist-ne/>.

² Entity ID F2044636, American Muslims for Palestine (Fairfax County VA), Fictitious name, 6404 Seven Corners Pl Ste N, Falls Church, VA, 22044 - 2034, Registered Agent Osama Abu Irshaid, <https://cis.scc.virginia.gov/EntitySearch/Index#> ; Entity name AJP Educational Foundation, Virginia State Corporation Commission, Clerk's Information System, <https://cis.scc.virginia.gov/EntitySearch/BusinessInformation?businessId=112738&source=FromEntityResult&isSeries%20=%20false>

³ <https://www.ampalestine.org/about-amp>

⁴ Entity ID F2044636, AJP Educational Foundation, Virginia State Corporation Commission, Clerk's Information System <https://cis.scc.virginia.gov/EntitySearch/BusinessInformation?businessId=112738&source=FromEntityResult&isSeries%20=%20false>

⁵ <https://www.adl.org/sites/default/files/american-muslims-for-palestine-2013-03-29-v4.pdf>

front organization in the U.S.^{6,7,8} According to the July 23, 2024 Congressional testimony of retired FBI Special Agent Lara Burns, who currently serves as the Head of Terrorism Research at George Washington University's Program on Extremism and who previously led the Department of Justice's largest Hamas financing prosecution in the United States:

In 1988 and with the Muslim Brotherhood's blessing, HAMAS developed its US-based structure that included: the Holy Land Foundation for Relief and Development (HLF), its primary fundraising arm that was based in Richardson, Texas; the Islamic Association for Palestine (IAP), its primary propaganda organization which was based in Chicago, IL; and the United Association for Studies and Research, a research institute that was based in Falls Church, VA....

Mousa Abu Marzook, who was a graduate student in the United States at the time, was the architect behind this infrastructure. These three organizations operated in the US as tax exempt organizations. During the early years of these organizations, Marzook rose to power within HAMAS' Political Bureau while retaining oversight of the HLF, IAP and UASR, and while securing Iran's financial and political support for HAMAS.⁹

At the 2008 federal trial in Dallas in which the Holy Land Foundation for Relief and Development (HLF) and its officials were convicted of providing material support to Hamas,¹⁰ the government introduced extensive evidence that the U.S. Muslim Brotherhood's Palestine Committee served as the original Hamas infrastructure in the United States, initially consisting of HLF (the fundraising arm of the Palestine Committee), IAP (the propaganda & media arm), and the UASR, (a think tank designed to promote a fundamentalist view of the Palestinian issue).¹¹ These documents demonstrated that the Hamas infrastructure in the United States utilized

⁶ "Federal Judge Hands Down Sentences in Holy Land Foundation Case," U.S. Department of Justice, Office of Public Affairs, Press Release, May 27, 2009. <https://www.justice.gov/archives/opa/pr/federal-judge-hands-downs-sentences-holy-land-foundation-case>, Accessed Oct. 6, 2025.

⁷ Memorandum Opinion and Order, *Boim et al. v. American Muslims for Palestine et al.* (1:17-cv-03591N.D. Ill. May 17, 2022), https://storage.courtlistener.com/recap/gov.uscourts.ilnd.339873/gov.uscourts.ilnd.339873.250.0_2.pdf

⁸ "Hamas' Influence on U.S. Campuses: A Study of Networks, Strategies and Ideological Advocacy." George Washington University Program on Extremism. 2024. https://extremism.gwu.edu/sites/g/files/zaxdzs5746/files/2024-11/Pamphlet_compressed.pdf

⁹ <https://waysandmeans.house.gov/wp-content/uploads/2024/07/Burns-Testimony.pdf>

¹⁰ "Federal Jury in Dallas Convicts Holy Land Foundation and Its Leaders for Providing Material Support to Hamas Terrorist Organization," U.S. Department of Justice Press Release. November 24, 2008. https://www.justice.gov/archive/usao/txn/PressRel08/HLF_convict_pr.html, archived at <https://archive.is/tQBCv>. Accessed November 11, 2024.

¹¹ Government's Second Supplemental Trial Brief, *U.S. v. Holy Land Foundation for Relief and Development, et al.*, (3:04-cr-240-G, N.D. Tex.). Document #1171, filed September 12, 2008. Pages 7 and 27. https://storage.courtlistener.com/recap/gov.uscourts.txnd.138728/gov.uscourts.txnd.138728.1171.0_1.pdf

these organizations that planned and worked with each other to specifically carry out its mission of supporting Hamas with media, political and financial support.^{12,13}

In December, 2001 the U.S. government designated the Holy Land Foundation (HLF) under Executive Orders 13224 and 12947 as a Specially Designated Terrorist (SDT) as a result of its work as a front organization for Hamas.¹⁴ HLF and five senior leaders were ultimately charged (2004) and convicted (2008) with providing material support to Hamas.¹⁵ Further, a federal civil lawsuit was filed against HLF, IAP, UASR and others under the Anti-Terrorism Act (ATA), alleging those organizations were liable for the death of David Boim, a U.S. citizen killed in Israel by Hamas, based on their support for Hamas during the relevant period. In 2004, the jury found HLF and IAP liable for the death of Boim and a \$156 million dollar judgment was returned against IAP.¹⁶

In the wake of the civil judgment, IAP closed its operations, and some have argued its leaders reconstituted and created AMP in 2006. : Substantiating this claim, Osama Abuirshaid, who is currently AMP's Executive Director, was employed by both IAP and UASR prior to his involvement in the creation of and current leadership position in AMP.¹⁷ Abuirshaid was the editor of IAP's newspaper,¹⁸ Al Zaytounah, as well as a research fellow at UASR.¹⁹ Former leaders of IAP, UASR and HLF who joined AMP also include Rafeeq Jaber (IAP), Kifah Mustafa (HLF/IAP) and Salah Sarsour (IAP).

¹² Government Exhibit Elbarasse Search - 5. "Islamic Action for Palestine - An internal memo - October - 1992." *U.S. v. Holy Land Foundation et al.*, (3:04-cr-240-G N.D. Tex.) Bates ISE-SW 18641 0000377-0000383. Page 13. https://extremism.gwu.edu/sites/g/files/zaxdzs5746/files/2025-02/Elbarasse_Search_5_1_0.pdf

¹³ Government Exhibit Elbarasse Search - 19. July 29, 1994. *U.S. v. Holy Land Foundation et al.*, (3:04-cr-240-G N.D. Tex.). ["Palestine Committee Agenda"]. https://extremism.gwu.edu/sites/g/files/zaxdzs5746/files/2025-02/Elbarasse_Search_19.pdf See also Opinion, *U.S. v. Mohammad El-Mezain et al.*, (09-10560, consolidated with 08-10664, 08-10774, 10-10590 and 10-10586, 5th Cir.) filed Dec. 7, 2011, revised Jan. 13, 2012. <https://www.ca5.uscourts.gov/opinions%5Cpub%5C09/09-10560-CR0.wpd.pdf>

¹⁴ "Treasury Department Statement in Response to Holy Land Foundation Court Ruling," Aug. 8, 2002, <https://home.treasury.gov/news/press-releases/po3340>. See also "Shutting Down the Terrorist Financial Network," U.S. Department of the Treasury Press Release, Dec. 4, 2001, <https://ofac.treasury.gov/recent-actions/20011204> and Fact Sheet on Shutting Down the Terrorist Financial Network <https://georgewbush-whitehouse.archives.gov/news/releases/2001/12/text/20011204-11.html> Accessed Oct. 6, 2025.

¹⁵ "Federal Judge Hands Down Sentences in Holy Land Foundation Case," U.S. Department of Justice, Office of Public Affairs, Press Release, May 27, 2009. <https://www.justice.gov/archives/opa/pr/federal-judge-hands-downs-sentences-holy-land-foundation-case>, Accessed Oct. 6, 2025. See also "No Cash for Terror," FBI.gov, Nov. 25, 2008. <https://archives.fbi.gov/archives/news/stories/2008/november/hlf112508>. Accessed Oct. 6, 2025.

¹⁶ Final Judgment Order, *Boim, et al. v. Quranic Literacy Institute (QLI), et al.* (1:00-cv-02905 N.D. Ill. Oct. 12, 2012), <https://storage.courtlistener.com/recap/gov.uscourts.ilnd.96451/gov.uscourts.ilnd.96451.889.0.pdf>

¹⁷ "Our Team," American Muslims for Palestine, <https://www.ampalestine.org/about-amp/our-team>

¹⁸ IslamOnLine.net, "Osama Abu-Irshaid," <https://web.archive.org/web/20090321012244/http://www.islamonline.net/livedialogue/english/Guestcv.asp?hGuestID=GHT37i>

¹⁹ "Abu Irshaid is a Research Fellow at the United Association for Studies and Research." Osama Abu Irshaid, "Occupied Palestine or Independent Israel: 'The Right to Existence' After More Than Fifty Years of Occupation," Washington Report on Middle East Affairs, *Middle East Affairs Journal*, Vol. 5, no. 3-4, Summer-Fall 1999, page 231. <https://www.investigativeproject.org/documents/misc/813.pdf>

In 2010, AMP officially announced a partnership with SJP in furthering student activism on US campuses²⁰ and later held rallies in support of actors within the Popular Front for the Liberation of Palestine (PFLP).^{21,22} In the years leading up to October 7, 2023, AMP and SJP have hosted rallies promoting “Intifada revolution.”²³

AMP has co-sponsored hundreds of pro-Hamas rallies on college campuses across the United States following the October 7, 2023 attacks in Israel. According to the Anti-Defamation League (ADL), AMP leaders push propaganda, false narratives and hate on college campuses, through various forms of social media as well as doing in-person media events. AMP has worked extensively to legitimize the October 7th terror attacks, delegitimize Israel and its actions against Hamas, suppress open dialogue, and create fear among the Jewish population in the United States.²⁴

Popular Front for the Liberation of Palestine (PFLP)

The PFLP was designated as a Foreign Terrorist Organization (FTO) and a Specially Designated Global Terrorist (SDGT) in October, 1997 and October, 2021, respectively.²⁵ Although PFLP is not Islamist in nature, they eagerly align with Iran and other FTOs to serve a common cause which involves not only the pursuit of the destruction of Israel, but also challenging Western democracies whom they see as aligned with Israel.²⁶

²⁰ https://web.archive.org/web/20110110054323/http://www.ampalastine.org/index.php?option=com_content&view=article&id=1496:students-gather-at-amp-conference-to-network-organize-regional-activism-efforts-&catid=96:articles; See also <https://web.archive.org/web/20160314145758/http://ussf.palestineconference.org/sjp-national-conference/>

²¹ See, e.g., <https://sjployola.com/>

²² “Naturalized U.S. Citizen Sentenced on Immigration Fraud for Failing to Disclose Terrorism Conviction,” U.S. Department of Justice Press Release, March 12, 2015 <https://www.justice.gov/archives/opa/pr/naturalized-us-citizen-sentenced-immigration-fraud-failing-disclose-terrorism-conviction>

²³ Canary Mission, “SJP and the Intifada,” https://canarymission.org/campaign/sjp_intifada

²⁴ “American Muslims for Palestine,” <https://www.adl.org/resources/backgrounders/american-muslims-palestine-amp>

²⁵ “United States and Canada Target Key International Fundraiser for Foreign Terrorist Organization PFLP,” U.S. Dep’t of the Treasury, Press Release, Oct. 15, 2024, <https://home.treasury.gov/news/press-releases/jy2646>.

²⁶ Popular Front for the Liberation of Palestine, <https://www.britannica.com/topic/Popular-Front-for-the-Liberation-of-Palestine>

AMP Faces Legal Actions

On September 29, 2025, the U.S. Department of Justice filed a civil lawsuit in New Jersey which alleged that AMP, and others, attempted to intimidate Jewish worshippers from exercising their religious freedom. On the same day, in an investigation conducted by the Attorney General for the Commonwealth of Virginia, AMP was ordered by a Virginia state judge to produce records repeatedly sought by the Attorney General or face severe consequences.

FACE Act Complaint

On September 29, the Department of Justice brought a civil action against, among others, the New Jersey chapter of AMP for violating the Freedom of Access to Clinic Entrances Act (FACE Act) for engaging in a “coordinated effort to intimidate and disrupt Jewish worshippers at a religious event” to be held at a synagogue in New Jersey.²⁷

The civil complaint sets forth in detail that, on November 13, 2024, the AMP New Jersey chapter, along with the New Jersey chapter of the Party for Socialism and Liberation (PSL), promoted an event designed to intimidate Jewish individuals who were planning on holding a religious event at the home of a member of the Congregation Ohr Torah synagogue. Individuals and co-defendant in the civil complaint allegedly showed up at the congregant’s home and appeared to take intimidating action against the synagogue member. When the event was relocated to the synagogue itself, a mob appeared who used harassing tactics, to include the use of vuvuzelas which can cause hearing loss, in an effort to prevent the event from going forward. The mob turned violent and two members of the congregation were attacked.

The FACE Act is a unique statute that allows the government to bring either a civil lawsuit or a criminal indictment against people or groups who interfere, either by force, threat of force, physical obstruction, intentional injuries, or intimidate or attempt to do so, with any person who is lawfully exercising one’s First Amendment right of religious freedom at a place of religious worship.

The Justice Department has elected to bring a civil suit which seeks an injunction preventing the AMP and other defendants from interfering with any person who is seeking to exercise one’s religious freedom at any place of worship in New Jersey. The government is specifically seeking a 50 foot buffer zone between the defendants and the Congregation as well as the home of the congregant at all times, and is seeking to prohibit the defendants from organizing or promoting any demonstration within 500 feet of any place of religious worship in New Jersey, during religious services, without a permit, if such demonstration is intended to disrupt or intimidate worshippers. The government is also seeking monetary penalties.

²⁷ Complaint, *United States of America v. Party for Socialism and Liberation New Jersey, American Muslims for Palestine New Jersey, Tova Fry a/k/a Terry Kay, Altaf Sharif, Matt Dragon, Eric Camins, Jane Doe and John Doe*. 2:25-cv-16049 R.#1 (D. N.J. Sept. 29, 2025). <https://www.justice.gov/crt/media/1415491/dl?inline>

Although criminal charges are still a possibility (and could be brought by the state of New Jersey against the individual actors who committed assault), and it is not unprecedented for both to be brought by DOJ for the same conduct, it would be unusual but not legally prohibited for the DOJ to bring both a civil case and criminal charges for the same conduct. To do so would create unnecessary logistical issues between the two cases that could negatively impact the civil case. Criminal charges require the government to prove the defendants guilty beyond a reasonable doubt, whereas the burden of proof in the civil arena is much lower and easier to meet. Moreover, the first violation of the FACE Act is a misdemeanor, which carries a maximum sentence of only one year.

A civil lawsuit is not as harsh and avoids any accusation of government overreach, but also justifies a later criminal case if AMP continued to engage in the same conduct with the same intentions - not just in New Jersey but anywhere in the country.

Virginia Attorney General Investigation

The New Jersey case is not AMP's only legal trouble, as AMP is also facing a severe challenge in Virginia. This development is the latest in a complex legal saga that began in 2023, when the Virginia Attorney General opened an investigation into "AJP Educational Foundation, d/b/a American Muslims for Palestine," for its potential violation of Virginia's charitable solicitation laws. Specifically, the Attorney General's Office announced that it "has reason to believe that the organization may be soliciting contributions in the Commonwealth without first having registered with the Commissioner of the Virginia Department of Agriculture and Consumer Services." The Attorney General also announced that it is investigating AMP for allegations that "the organization may have used funds raised for impermissible purposes under state law, including benefitting or providing support to terrorist organizations."²⁸

During the course of a civil investigation, the government may issue civil demands to any entity for documents. Although the government does not need to seek an order from a court to issue a demand, the demand has the force and effect of a court order. In other words, the party receiving a demand must comply or file a motion to quash. Failure to do either may result in penalties.

In October 2023, the AG's office issued a civil demand to AMP for documents. AMP did not comply. The AG's office filed a motion with the Court in Virginia to enforce the demand. In June 2025, the Court issued an order requiring AMP to fully comply with the civil demand. AMP still did not comply and the AG's office filed a Motion for Rule to Show Cause as to why AMP should not be held in contempt of court. On September

²⁸ "Attorney General's Office Opens Investigation Into American Muslims for Palestine Nonprofit," Press Release, Office of the Attorney General, Commonwealth of Virginia, Oct. 31, 2023, <https://www.oag.state.va.us/media-center/news-releases/2630-october-31-2023-attorney-generals-office-opens-investigation-into-american-muslims-for-palestine-nonprofit>.

29, the Court granted the motion and found AMP to be in contempt.²⁹ It ordered AMP to fully comply with the June order (the civil demand for records) by October 3, 2025. The Court stated that failure to comply will result in a fine of \$1,000 per day until AMP fully complies. The Court also ordered AMP to pay \$8,000 for the costs incurred by the AG's office in bringing the motion. Finally, the Court ordered Osama Abu Irshaid, AMP's Director, or another officer with knowledge of the civil demand, to appear before the court on October 28 to assess whether AMP has fully complied with the subpoena.³⁰

If AMP does not comply, the Court has the additional option of detaining a representative of AMP until such time as AMP complies to the satisfaction of the court.

Conclusion

The DOJ has positioned itself well by bringing a FACE Act civil case in lieu of criminal charges for several reasons (assuming DOJ sticks with its current plan). First, the judge assigned to the civil case will likely recognize that DOJ had the option to bring harder hitting criminal charges but chose not to. This will make the DOJ appear to be more reasonable before the court, which could benefit the DOJ throughout the proceedings. Second, the civil case is a warning to AMP nationwide; essentially a shot across its bow. If AMP chooses to ignore the warning and continues with its disruptive behavior, then a criminal indictment could make it more difficult to defend, both in court and in the court of public opinion. Third, the civil case does a nice job of balancing AMP's First Amendment rights to free speech by not seeking to prohibit AMP and others from demonstrating near houses of worship while at the same time seeking to protect the rights of congregants by insuring (or attempting to) that AMP does not create or promote a hostile environment that intimidates individuals from exercising their First Amendment right of religious freedom. The civil case is a warning to AMP that DOJ will not tolerate their behavior.

The Virginia AG's ongoing investigation focuses on how AMP raises funds and where it sends the money. AMP has been called to task by the Virginia court for its failure to comply with the investigation and with subsequent court orders. That conduct can come back to bite AMP down the road if the Virginia AG's office brings a case – civil or criminal – against AMP. For example, if any AMP executive has to testify at a hearing or a trial, this conduct may be the subject of cross examination and could lead the court, or a jury, to infer a consciousness of guilt. It will be interesting to see if AMP employs the same tactic during the DOJ's civil case.

²⁹ "American Muslims for Palestine Found in Civil Contempt of Court," Press Release, Office of the Attorney General, Commonwealth of Virginia, Sept. 29, 2025 <https://oag.state.va.us/media-center/news-releases/2917-september-29-2025-american-muslims-for-palestine-found-in-civil-contempt-of-court>

³⁰ *Commonwealth Of Virginia, Ex Rel. Jason S. Miyares, Attorney General, Petitioner, v AJP Educational Foundation d/b/a American Muslims for Palestine*, CL25-174 DED (September 29, 2025).



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