UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, ex rel. TZAC, INC.,	)	
Plaintiffs,	)	Civil Action No. 21-3403 (JMC)
v.	)	**FILED UNDER SEAL**
A JEWISH VOICE FOR PEACE, INC.,	)	
Defendant.	)	

NOTICE OF INTERVENTION FOR THE PURPOSE OF SETTLEMENT

Pursuant to 31 U.S.C. § 3730(b)(2) and (4), Plaintiff the United States of America notifies the Court of its decision to intervene in this action for purposes of settlement. The United States, Relator TZAC, Inc., and Defendant A Jewish Voice For Peace, Inc., have executed a settlement. For the purpose of effectuating and formalizing that resolution, pursuant to the False Claims Act, 31 U.S.C. § 3730, the United States respectfully advises the Court of its decision to intervene for the purposes of settlement.

Specifically, the United States intervenes in this action as to the following alleged conduct:

1. In January 2021, A Jewish Voice For Peace, Inc. falsely certified that it was "not a business concern or entity primarily engaged in political or lobbying activities, including any entity that is organized for research or for engaging in advocacy in areas such as public policy or political strategy or otherwise describes itself as a think tank in any public documents," when it applied for and received a second draw loan in the amount of $338,817.00 under the Paycheck Protection Program ("PPP") Disaster Relief Program.

2. Further, that A Jewish Voice For Peace, Inc. falsely certified in a loan forgiveness application that it met the conditions for receiving the second draw PPP loan, when in fact it had not.

The United States declines intervention as to all other claims asserted on behalf of the United States in this action, to the extent that any other claims are asserted in the Relator's Complaint. Under the terms and conditions of the Settlement Agreement among the parties, the United States and Relator will file a Notice of Dismissal of this action and settled claims following the payment of the settlement amount by A Jewish Voice For Peace, Inc.

Further, the United States respectfully requests that this Court maintain this case under seal for an additional ninety days, to December 19, 2024, to permit the parties to complete the administrative payment process that Defendant must follow pursuant to the settlement agreement. Once the payment is received, the United States will move to lift the seal over specified documents in this matter and will dismiss this action.

The United States requests that all papers on file in this action remain under seal because in discussing the content and extent of the United States' investigation, such papers are provided by law to the Court alone for the sole purpose of evaluating whether the seal and time for making an election to intervene should be extended.

* * *

September 17, 2024

Respectfully submitted,

MATTHEW M. GRAVES, D.C. Bar #481052
United States Attorney

BRIAN P. HUDAK,
Chief, Civil Division

By: */s/ Stephen DeGenaro*
STEPHEN DEGENARO, D.C. Bar #1047116
DARRELL VALDEZ, D.C. Bar #420232
Assistant United States Attorneys
United States Attorney's Office – D.C.
Civil Division
601 D Street, N.W.
Washington, D.C. 20530
(202) 252-7229 (DeGenaro)
(202) 252-2507 (Valdez)
Stephen.DeGenaro@usdoj.gov
Darrell.Valdez@usdoj.gov

Counsel for the United States of America

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 17th day of September 2024, a true and correct copy of the above and foregoing Notice of Intervention for the Purpose of Settlement and proposed Order was served through electronic mail to:

David Abrams
The Zionist Advocacy Center
dnabrams@gmail.com

Counsel for Relator

Stephen DeGenaro
STEPHEN DEGENARO
Assistant United States Attorney