UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, ex rel. TZAC, INC.,	)	
Plaintiffs,	)	Civil Action No. 21-3405 (JDB)
v.	)	**FILED UNDER SEAL**
MIDDLE EAST INSTITUTE,	)	
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 Middle East Institute have reached a settlement-in-principle that the parties are in the process of finalizing for execution. 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 February 2021, The Middle East Institute 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 $359,279.00 under the Paycheck

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Court for the District of Columbia

Protection Program ("PPP") Disaster Relief Program.

2. Further, that The Middle East Institute 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 proposed 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 The Middle East Institute.

The United States also requests that the Relator's Complaint, this Notice, and the attached proposed Order be unsealed. The United States requests that all other 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.

* * *

January 22, 2024

Respectfully submitted,

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

BRIAN P. HUDAK,
Chief, Civil Division

By: */s/ Darrell C. Valdez*
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Counsel for the United States of America

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 22nd day of January 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

Darrell C. Valdez
DARRELL VALDEZ
Assistant United States Attorney