

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA EX REL.  
TZAC, INC.,

Plaintiff-Relator,

v.

EDUCATION FOR JUST PEACE IN [THE]  
MIDDLE EAST A/K/A UNITED STATES  
CAMPAIGN FOR PALESTINIAN RIGHTS,

Defendant.

Case No. 1:22-cv-00137-DLH-CRH  
**\*FILED UNDER SEAL\***

**FILED UNDER SEAL PURSUANT TO 31 U.S.C. § 3730(b)(3)**  
**NOTICE OF INTERVENTION BY THE UNITED STATES OF AMERICA**  
**FOR THE PURPOSE OF SETTLEMENT AND MOTION TO PARTIALLY UNSEAL**

Pursuant to 31 U.S.C. § 3730(b)(2) and (4), the United States of America (“United States”) notifies the Court of the United States’ election to intervene in this action for purposes of settlement. The United States, relator TZAC, Inc. (“Relator”), and defendant Education for Just Peace in the Middle East d/b/a US Campaign for Palestinian Rights (“EfJP”) (collectively, “the Parties”) have entered into a settlement agreement. Upon completion of certain conditions precedent in the settlement agreement, the United States and Relator expect to file a stipulation for dismissal on terms, without EfJP being served. Filing of the stipulation is expected to occur within the next 30 days.

The United States moves for the following relief:

1. That the Court unseal Relator’s Complaint (Docs. 1 through 1-2), Corporate Disclosure (Doc. 2), and this Notice of Intervention by the United States of America for the Purpose of Settlement and Motion to Partially Unseal (Doc. 24).

2. That all other papers previously filed in this action remain under seal. These documents should 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.

3. That the seal be lifted on all other matters and filings occurring hereafter in this action, unless otherwise directed by the Court.

Dated: September 16, 2025

JENNIFER KLEMETSRUD PUHL  
Acting United States Attorney

By: /s/ James Patrick Thomas  
JAMES PATRICK THOMAS  
ND Bar No. 06014  
MICHAEL D. SCHOEPF  
ND Bar No. 07076  
Assistant United States Attorneys  
PO Box 699  
Bismarck, ND 58502-0699  
(701) 530-2420  
[james.p.thomas@usdoj.gov](mailto:james.p.thomas@usdoj.gov)  
[michael.schoepf@usdoj.gov](mailto:michael.schoepf@usdoj.gov)

Counsel for United States of America