

United States Senate
WASHINGTON, DC 20510

April 5, 2024

VIA ELECTRONIC TRANSMISSION

Mr. Simon Levine
Global Co-CEO
DLA Piper

Mr. Frank Ryan
Global Co-CEO
DLA Piper

Dear Mr. Levine and Mr. Ryan:

In 2020, I began an investigation into allegations that World Vision International (World Vision) diverted government funds to a terrorist-funding organization, the Islamic Relief Agency (ISRA).¹ The investigation found that World Vision had access to the appropriate public information and should have known how to properly vet ISRA as a sub-grantee, but failed to do so.² This resulted in the transfer of U.S. taxpayer dollars to an organization with an extensive history of supporting terrorist organizations and terrorists. Since then, a former employee of World Vision, Mohammad Halabi was reportedly tried and convicted of funneling money to the terrorist group Hamas.³ Halabi had worked for World Vision since 2005, and starting in 2014 worked as its Gaza manager of operations until his arrest in 2016.⁴

In 2016, World Vision publicly announced the suspension of its Gaza operations in response to the Halabi arrest.⁵ World Vision also publicly stated that they would conduct a full

¹ Memorandum from Oversight and Investigations Unit, Fin. Comm., to Sen. Charles Grassley, World Vision Financial Transactions (Dec. 22, 2020), <https://www.finance.senate.gov/imo/media/doc/Oversight,%2012-23-20,%20Memo%20on%20World%20Vision%20Investigation.pdf>.

² *Id.* at 5.

³ Shira Rubin, *Israel Sentences Gaza Aid Worker Convicted of Funding Hamas to 12 Years*, THE WASHINGTON POST (Aug. 30, 2022), <https://www.washingtonpost.com/world/2022/08/30/israel-gaza-halabi-world-vision/>; see also Letter from Andrew J. Morley, President and CEO, World Vision Int'l, to Sen. Charles Grassley, Ranking Member, Senate Budget Comm. (Dec. 15, 2023) (on file with Comm. staff) (Stating, “[w]e are aware that some media accounts stated that Mr. Halabi diverted \$50 million, and we agree and believe that diversion of any amount is unacceptable. However, we would respectfully point out that Mr. Halabi was not in fact convicted of diverting \$50 million. Neither the official charges against him, nor the verdict, contain that number. No specific evidence of particular amounts or particular transactions alleged to be diversions has ever been produced.”).

⁴ Joe Dyke, *Has A Lone Palestinian Aid Worker Been Falsely Accused of the Biggest Aid Money Heist In History?*, THE GUARDIAN (Aug. 19, 2021), <https://www.theguardian.com/world/2021/aug/19/aid-worker-mohammed-el-halabi-gaza-israel-trial-largest-theft-aid-money-history>.

⁵ Press Release, World Vision Int'l, Update: Statement by World Vision International CEO In Wake of Staff Arrest (Aug. 8, 2016), <https://www.wvi.org/jerusalem-west-bank-gaza/pressrelease/update-statement-world-vision-international-ceo-wake-staff>.

investigation and forensic audit of their Gaza operations which was completed in July 2017.⁶ According to World Vision, that forensic audit “found no evidence of diversion of funds and no material evidence that El Halabi was part of, or working for, Hamas.”⁷ However, the audit was never released to the public and to-date World Vision has refused to provide a copy to Congress. World Vision’s refusal to be fully transparent to the public is ironic considering World Vision’s August 6, 2016, press release where it called for a “fair and transparent legal process” regarding Halabi’s arrest.⁸

On August 11, 2023, I sent World Vision a letter with respect to the conviction of Halabi for funneling money to the terrorist group Hamas while he was employed as World Vision’s head of operations in Gaza.⁹ World Vision failed to respond fully and completely in its September 9, 2023, letter.¹⁰

With respect to question one, I requested an unredacted copy of the forensic audit and investigation of World Vision’s Gaza operations, which has never been released to the public or to Congress. In response, World Vision refused a valid and legitimate congressional request to provide an unredacted copy to Congress on the basis that contractual terms – which were not provided in the response letter – with DLA Piper and Deloitte only allowed for copies to be produced to certain U.S. government agencies, such as the State Department and USAID, and foreign governments.¹¹

Specifically, World Vision stated in its September 9, 2023, letter that, “[World Vision] engaged the law firm DLA Piper, assisted by an advisory firm [reportedly Deloitte¹²], to conduct a forensic investigation” and “[t]he contractual terms provided by the external firms for that engagement restrict the distribution of any final report, allowing for copies of the report to be provided to certain agencies of the governments of Australia, Canada, Germany, the UK, and the US. Pursuant to those terms, a copy of the final report was provided to the US State Department and to the US Agency for International Aid Development (USAID).”¹³

⁶ Press Release, World Vision Int’l, World Vision Statement Regarding The Trial of Mohammad El Halabi (Dec. 18, 2020), <https://www.wvi.org/newsroom/jerusalem-west-bank-gaza/mohammad-el-halabi-trial-overview/world-vision-statement-regarding-trial-mohammad-el-halabi>.

⁷ *Id.*

⁸ Press Release, World Vision Int’l, Update: Statement by World Vision International CEO In Wake of Staff Arrest (Aug. 8, 2016), <https://www.wvi.org/jerusalem-west-bank-gaza/pressrelease/update-statement-world-vision-international-ceo-wake-staff>.

⁹ Letter from Sen. Charles Grassley, Ranking Member, Senate Budget Comm., to Andrew J. Morley, President and CEO, World Vision Int’l (Aug. 11, 2023), https://www.grassley.senate.gov/imo/media/doc/grassley_to_world_vision_-_terrorist_ties.pdf; see also Rubin, *supra* note 2.

¹⁰ Letter from Andrew J. Morley, President and CEO, World Vision Int’l, to Sen. Charles Grassley, Ranking Member, Senate Budget Comm. (Sept. 9, 2023) (on file with Comm. staff).

¹¹ *Id.*

¹² Dyke, *supra* note 3. In World Vision’s September 9, 2023, letter, it cited this Guardian article, which stated, “The same month, [World Vision] commissioned Deloitte, one of the world’s largest auditing firms, and US law firm DLA Piper to review all their spending, which one source said cost an additional \$7m;” “Four months later, the review World Vision had commissioned, from DLA Piper and auditors from Deloitte, was also completed;” See also letter from Sen. Charles Grassley, *supra* note 9. This letter to World Vision noted that it had hired DLA Piper and Deloitte to complete the audit, which World Vision did not dispute.

¹³ Letter from Andrew J. Morley, *supra* note 10.

On November 21, 2023, I again requested a copy of the audit as well as the full contract prohibiting its production to Congress.¹⁴ World Vision failed to respond fully and completely in its December 15, 2023, letter.¹⁵ Instead, World Vision provided the following contractual excerpt it asserted to again refuse production to Congress:

Counsel and the Company each agrees that, without Advisor's prior written permission, any reports, schedules, documents, or other materials provided by Advisor ("Advisor Work Product") are not to be disclosed, quoted or referenced, in whole or in part, to any third party with the exception of (i) regulatory agencies and stakeholders (see list and further conditions at Appendix B), (ii) the Company's independent accountants to the extent required solely in connection with their audit of the Company's financial statements, (iii) the Board of Directors of the Company only for their informational purposes and solely in their capacity as a member of such Board, and (iv) legal counsel, banks, insurance companies and brokers provided the Company executes an access letter in the form attached as Appendix C.¹⁶

According to World Vision, the relevant portion of Appendix B states:

As stated in the attached engagement letter agreement . . . Counsel and the Company each agrees that, without Advisor's prior written permission, any reports, schedules, documents, or other materials provided by Advisor ("Advisor Work Product") are not to be disclosed, quoted or referenced, in whole or in part, to any third party with the exception of the list of regulatory agencies and stakeholders below, provided Counsel or the Company requests confidential treatment and stipulates that further distribution of any Advisor Work Product by the third parties is prohibited without the written consent of Advisor.

United States of America

US Agency for International Development (USAID)

US Department of State

US Department of Justice (DoJ)

US Internal Revenue Service (IRS)¹⁷

¹⁴ Letter from Sen. Charles Grassley, Ranking Member, Senate Budget Comm., to Andrew J. Morley, President and CEO, World Vision Int'l (November 21, 2023) https://www.grassley.senate.gov/imo/media/doc/grassey_to_world_vision_-_terrorist_ties_follow_up.pdf.

¹⁵ Letter from Andrew J. Morley, *supra* note 3.

¹⁶ *Id.*

¹⁷ *Id.*

World Vision also noted in its September 9, 2023, response that it not only provided a copy of the audit to the governments of Australia, Canada, Germany, and the UK, but also gave them “the opportunity to participate in defining the terms of the investigation, and receiv[e] periodic briefings from the investigators while the investigation was in process.”¹⁸ According to the terms of World Vision’s letter, no such special treatment was given to Congress, who was instead outrageously given the stiff-arm which continues to the date of this letter.

According to World Vision’s 2023 Consolidated Financial Statements, in FY22 its revenue was \$1.4 billion and, of that amount, over \$200 million came from U.S. government grants subject to congressional appropriations.¹⁹ World Vision is organized as a 501(c)(3) nonprofit and receives the benefit of that statutory tax status because of Congress and the American people.²⁰ As such, World Vision has an obligation to be fully transparent to Congress and the American people and its failure to do so is without any legitimate basis.

Why did your firm participate in crafting contractual text that created a prohibition on producing the forensic audit to Congress and the American people, especially considering World Vision’s receipt of taxpayer money and its organization under the U.S. tax code as a non-profit? Transparency brings accountability and your firm’s conduct demands explanation.

Congress and the American people deserve transparency with respect to the steps World Vision has taken to ensure taxpayer money is used as intended and not for improper activity. Congress and the American people also should know the full extent of DLA Piper’s role in preventing Congress and the public from possessing the audit and related records. Please provide answers to the following questions by April 19, 2024.

1. Is DLA Piper able to definitively say that no taxpayer money was used in any way to conduct and complete the audit for which it was paid compensation?
2. How much money was DLA Piper paid to complete and conduct the audit?
3. Explain DLA Piper’s rationale behind cutting Congress out of the approved entities World Vision can provide the audit to but allowing foreign governments to possess a copy of the audit.
4. Provide an unredacted copy of the audit.
5. Provide an unredacted copy of the contract DLA Piper and Deloitte has with World Vision to conduct the audit.

¹⁸ Letter from Andrew J. Morley, *supra* note 10.

¹⁹ WORLD VISION INT’L, WORLD VISION INC. AND AFFILIATES, CONSOLIDATED FINANCIAL STATEMENTS 23 (2022), https://wvusstatic.com/2023/financial-accountability/F_WVConsolidated-Financial-Statement.pdf; see also letter from Andrew J. Morley, *supra* note 3.

²⁰ *Id.*

6. Provide all underlying records relating to the audit, including unredacted copies of all transcribed interviews.²¹
7. Provide a full list of all foreign governments that were given a copy of the audit.
8. Provide a full list of all U.S. government agencies that were given a copy of the audit.
9. Were any entities not named in the contract provided a copy of the audit? If so, which entities and when?
10. Will DLA Piper provide World Vision with the authorization to provide an unredacted audit to Congress? If not, why not?

Thank you for your prompt attention to this matter. Should you have any questions, please contact Tucker Akin on my committee staff at (202) 224-0642.

Sincerely,



Charles E. Grassley
Ranking Member
Committee on the Budget

²¹ "Records" include any written, recorded, or graphic material of any kind, including letters, memoranda, reports, notes, electronic data (emails, email attachments, and any other electronically created or stored information), calendar entries, inter-office communications, meeting minutes, phone/voice mail or recordings/records of verbal communications, and drafts (whether they resulted in final documents).