INDIANA UNIVERSITY

April 3, 2026

Representative Andrew Ireland
Indiana House of Representatives
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Representative Ireland and colleagues:

Thank you for your recent letter and for the opportunity to directly address concerns about recent trainings conducted through Indiana University's Lilly Family School of Philanthropy. Like you, we are deeply concerned about any scenario in which an Indiana University (IU) program has been engaged with bad actors. To that end, the Office of the General Counsel has initiated, at President Whitten's direction, an initial internal investigation to understand key facts regarding the Muslim Philanthropy Initiative's engagement with United Mission Relief and Development (and, in turn, with Hayat Yolu).

To provide a response in a timely fashion to your letter, two enclosures follow:

- Initial findings from the internal investigation and review conducted by IU's Office of the General Counsel.
- An overview of additional actions IU intends to take to further expand due diligence and oversight for potentially high-risk partnerships and engagements.

We hope these enclosures provide additional clarity regarding IU's actions before and after March 12, 2026, and address particular points of shared concern outlined in your letter. Our ultimate priority is to build on existing protocols and further enhance due diligence and oversight that ensures that IU engages exclusively with respected partners, both domestic and international, who demonstrate transparency and integrity.

We remain grateful for your outreach and for the opportunity for ongoing dialogue.

Sincerely,

Shannon Kiely Heider
Vice President, Government and Community Relations

CC Representative Garrett Bascom
Representative Martin Carbaugh
Representative Matt Commons
Representative Craig Haggard
Representative Chris Judy
Representative Jim Lucas
Representative J.D. Prescott

Enclosure I: Preliminary Investigatory Background and Findings

After review of the March 12, 2026, Department of Treasury's Office of Foreign Assets Control's (OFAC) Specially Designated National List, the Office of the General Counsel interviewed Indiana University Indianapolis Chancellor Latha Ramchand, Lilly Family School of Philanthropy Dean Amir Pasic, and Muslim Philanthropy Initiative (MPI) Director Shariq Siddiqui. As part of this internal investigation, the Office of the General Counsel also issued a legal hold to individuals identified for their engagement regarding the MPI/Hayat Yolu training programs conducted in July 2025 and January 2026 to preserve relevant documentation.

Preliminary investigatory findings include the following:

In April 2025, MPI was working with the US-based nonprofit United Mission for Relief and Development (UMRD) to identify local partners for philanthropy training sessions that were scheduled to take place later in 2025 in Istanbul and Indonesia. UMRD leadership identified Hayat Yolu to MPI Director Shariq Siddiqui as the recommended local partner for both training sessions. Director Siddiqui reports that he received confirmation from UMRD leadership that Hayat Yolu was a legitimate organization, and that he also conducted independent research and sought feedback from trusted contacts within his network. Siddiqui stated that neither his research nor feedback from international community members identified any concerns with Hayat Yolu.

Through its relationship with UMRD, Hayat Yolu provided reimbursement for Director Siddiqui's flights, hotels, transportation and meals for the July 2025 and January 2026 programs, which were the final scheduled programs.

Two months later, on March 12, 2026, the U.S. Department of the Treasury's Office of Foreign Assets Control added Hayat Yolu to its Specially Designated Nationals and Blocked Persons List. That designation prevented U.S. persons, going forward, from engaging in transactions with Hayat Yolu. In compliance with OFAC's March 12, 2026 addition of Hayat Yolu to its Specially Designated Nationals and Blocked persons list, MPI has had no further engagement with Hayat Yolu.

Following the designation, the Lilly Family School of Philanthropy ceased all MPI convening and training activities and suspended new partnerships of the MPI. Additionally, the Lilly Family School of Philanthropy has initiated a review of all partnerships and collaborations to ensure alignment with institutional mission, values, and expectations.

Indiana University has determined that MPI's actions appear not to have violated any applicable state and/or federal laws, as the trainings occurred prior to March 12, 2026. This determination is based on the Office of the General Counsel's review of MPI's July 2025 and January 2026 engagement with Hayat Yolu for training sessions in Istanbul and Indonesia, the U.S. Department of the Treasury's Office of Foreign Assets Control's March 12, 2026 addition of Hayat Yolu to its Specially Designated Nationals and Blocked Persons List, and the going forward prohibition for U.S. persons engaging in transactions involving Hayat Yolu. As such, no referral to law enforcement or relevant federal authorities is warranted.

However, the university is not satisfied that legal compliance alone is a sufficient bar in its efforts to ensure that it is not engaged with international bad actors. To this end, the university continues to review information aimed at identifying opportunities for improvement.

Enclosure II: Additional Action Steps and Safeguards

While investigatory findings do not reveal any violation of state or federal law, Indiana University remains committed to identifying appropriate efforts to ensure that IU engages exclusively with respected partners, both domestic and international, who demonstrate transparency and integrity.

Indiana University maintains university-wide protocols governing the acceptance of major gifts, as well as formal policies addressing contractual agreements with overseas institutions and cross-border activities (IU Policy INT-01) and the protection of research interests and intellectual property (IU Policy RP-11-012).

However, the university has, to date, applied a highly decentralized approach in its due diligence protocol for other potentially high-risk partnerships or relationships. Additionally, the investigatory findings reveal an over-reliance at IU on both government designations and decentralized individual investigatory due diligence when considering potentially high-risk partnerships or relationships.

As a result, IU is exploring a series of additional actions to enhance due diligence and oversight designed to pre-empt future engagement with potentially high-risk partnerships.

- Expanding the role of the Indiana University Research Security Office (RSO), the entity responsible for addressing security risks to the university's robust research enterprise, as a resource for Indiana University units considering potentially high-risk partnerships and relationships. RSO was integral in establishing university policy (RP-11-012)[1] on Research Security, which includes guidance on institutional international engagement.

- Directing the Chief Research Security Officer and Director of Research Security and Export Control to make recommendations regarding enhanced safeguards and standard operating procedures for reviewing potential high-risk partnerships—drawing on the university's expertise garnered through the development of RP-11-012.

- Developing and implementing training for faculty and staff engaged in international partnerships to ensure understanding of newly developed enhanced safeguards and standard operating procedures for reviewing potentially high-risk partnerships.

- Directing relevant university offices to identify opportunities to further improve the oversight and efficiency of gift acceptance and contracting practices.

- Directing the Dean of the Lilly Family School of Philanthropy to review the oversight structure for the Muslim Philanthropy Initiative, specifically, including considering the merging of activities related to Muslim philanthropy within the highly regarded Lake Institute on Faith & Giving.

[1] RP-11-012 is a university policy that restricts contractual agreements or transactions with, or disbursal of funds to, parties appearing on the Specially Designated Nationals List, BIS Entity List, BIS Unverified List, Military End User List, or the §1286 List. RP-11-012 also prohibits, pursuant to Indiana law, the use of state funds or resources to (1) engage or contract with an individual associated with a Foreign Terrorist Organization or a State Sponsor of Terror; or (2) support the activities of a Foreign Terrorist Organization or a State Sponsor of Terror.