

1 Michael E. Reznick, Esq. State Bar No. 116126
2 LAW OFFICES OF MICHAEL E. REZNICK
3 A Professional Corporation
4 283 Ocho Rios Way
Oak Park, California 91377-5540
Tel: (818) 437-5630
Email: reznagoura@aol.com

Electronically FILED by
Superior Court of California,
County of Los Angeles
5/15/2024 4:19 PM
David W. Slayton,
Executive Officer/Clerk of Court,
By J. Covarrubias, Deputy Clerk

5 Attorney for Plaintiffs DOE JEWISH USC
6 FACULTY MEMBER 2004, Individually
7 And On Behalf Of All Others Similarly Situated

8 SUPERIOR COURT FOR THE STATE OF CALIFORNIA
9 COUNTY OF LOS ANGELES

10
11 DOE JEWISH USC FACULTY MEMBER
12 2004, Individually And On Behalf Of All
Others Similarly Situated,

13 Plaintiffs,

14 v.

15 Trustees of THE UNIVERSITY OF
16 SOUTHERN CALIFORNIA, a private
17 public benefit corporation; and DOES 1
through 100, inclusive,

18 Defendants.
19
20

CASE NO.: 24STCP01592

CLASS ACTION COMPLAINT FOR
DAMAGES, INJUNCTIVE AND OTHER
RELIEF FOR:

- 1) VIOLATION OF THE BANE ACT [California Civil Code section 52.1]
- 2) VIOLATION OF THE UNRUH ACT [California Civil Code section 51]
- 3) VIOLATION OF THE RALPH ACT [California Civil Code section 51.7]
- 4) NEGLIGENCE
- 5) BREACH OF CONTRACT
- 6) ASSAULT
- 7) BATTERY
- 8) DECLARATORY RELIEF
- 9) INJUNCTIVE RELIEF

21 Plaintiffs DOE JEWISH USC FACULTY MEMBER 2004 (collectively "Plaintiffs" or
22 "Jewish Professors") individually and on behalf of all others similarly situated, for their
23 complaint against defendants TRUSTEES OF THE UNIVERSITY OF SOUTHERN
24 CALIFORNIA ("USC"), a private public benefit corporation, and DOES 1 through 100, allege
25 as follows:
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

INTRODUCTION AND FACTS RELEVANT TO ALL CAUSES OF ACTION

1. In the Spring of 2024 -- fearful of demonstrations sprouting up at other campuses, repercussions from “diversity and equity” leaders and the cutting off of university funding by the Hamas-supporting Biden Administration -- the Trustees of the University of Southern California (“USC”), (collectively “Defendant University”) invited, encouraged, aided, abetted, permitted, allowed, and subsequently appeased, enabled and negotiated with violent, sword and other weapon-wielding, Jew-hating Hamas-supporting campus terrorists antisemites (the “Campus Terrorists”) who infiltrated and overtook its Los Angeles campus (the “Encampment”), setting up tents and occupying USC property under the Defendant University’s watchful eyes.

2. The Campus Terrorists’ intent and the avowed purpose of the Encampment – clear to most reasonable persons with common sense - was to create and sow division through acts of disruption, chaos and dissension on the Defendant University’s campus. Among other things, the Campus Terrorists sought to and in fact did disrupt classes, overtook University buildings and property, and most importantly, terrorized and victimized blameless Jewish Students and Faculty in a rein of terror under the hoax, guise, and “cover” of engaging in peaceful protests to support fictitious victims of the Israeli government’s alleged “Palestinian Genocide.” The hoax was enabled by and perpetrated under the Defendant University’s watchful eyes to such an extent that Plaintiffs, Jewish Students and Jewish Professors and Faculty were so fearful for their lives and safety that they could not appear in the Defendant University’s “town square” or anywhere else on campus without being verbally or physically assaulted by the Campus Terrorists, as well as the Campus Terrorists’ student supporters lulled in by the false sense of security afforded to them by the Defendant University’s “appeasement” policy of coddling the Campus Terrorists. Plaintiffs, Jewish Students and Jewish Professors and Faculty were touched without their consent and spat on by the Campus Terrorists if they dared to cross into the Encampment. Their fear was and still is genuine and palpable. The fear was and is made worse by the Defendant University’s

1 encouragement of the offensive conduct for weeks on end before finally taking steps of
2 remediation.

3 3. Alternatively, Plaintiffs, Jewish Students and Jewish Professors and Faculty were told by
4 the Defendant University to work remotely from home, or remain in their offices or dorms for
5 their "own safety." Classes and commencement exercises were cancelled as the Defendant
6 University continued to appease, coddle and negotiate with the Campus Terrorists. Jewish
7 Students and Jewish Professors and Faculty (including the Plaintiffs herein) were not allowed to
8 attend classes as usual or give lectures or grade papers on site and could not walk safely to class
9 or their offices on campus without being assaulted and accosted by the Campus Terrorists. (See
10 You Tube video of "Anti-Israel protesters" blocking Jewish students from getting to class at
11 UCLA Campus) (but an accurate depiction of what the Campus Terrorists did to Plaintiffs herein
12 during their siege prior to LAPD's removal of the Encampment and are still doing to Jewish
13 Professor and other Jewish Faculty members). Among other things, the Campus Terrorists
14 demanded and are still demanding suitable answers to the question, "Are you a Zionist?" before
15 allowing Plaintiffs passage or access to common areas on USC's Campus, all under the watchful
16 eyes of the Defendant University. ([https://www.yahoo.com/news/zionist-checkpoints-ucla-
17 encampment-provoked-113331619.html](https://www.yahoo.com/news/zionist-checkpoints-ucla-encampment-provoked-113331619.html); <https://www.youtu.be/v7ibgdWRMkg>;
18 <https://www.yutu.be/G8YdzrM>). Meanwhile, other Hamas-leaning and supporting faculty
19 members hired by Defendant University to abide by DEI quotas continued to encourage students
20 attending classes to participate in the chaos and disruption created by the Campus Terrorists by
21 offering such students extra credit and better grades for participating, all with the knowledge and
22 consent of the Defendant University. Plaintiffs, Jewish Students and Jewish Professors and
23 Faculty are regularly exposed to pro-Hamas propaganda and posters "calling all students, faculty
24 and staff" to attend pro-Hamas rallies on USC Campus property, such as Bovard Hall. These
25
26
27
28

1 pro-Hamas rallies, endangering Plaintiffs, Jewish Students and Jewish Professors and Faculty, are
2 encouraged by and acquiesced to by Defendant University.

3 4. At all times herein mentioned, the Defendant University also knew or should have known
4 that nearly half of the Campus Terrorists creating, managing and equipping the Encampment and
5 causing the harm to Jewish Students and Faculty, creating the chaos and disruption and
6 overtaking the Defendant University's buildings and property, were and still are in fact paid
7 outside agitators rather than genuine students attending classes at the Defendant University who
8 were and are instigated and funded by wealthy Democrat Party donors and radical Democrat Left
9 Wing political action groups, including the Rockefeller Brothers Fund, Tides Center, Soros
10 Foundation and Popular Front for the Liberation of Palestine ("PFLP"), all done under the
11 Defendant University's watch. (*New York Post*, various articles, April – May 2024).

12 13 14 5. Far from "peaceful protests" and the "free speech" narrative promulgated by the
15 Democrat-party controlled media, Democrat congressmen and the Democrat Party itself, the
16 dangerous hate-filled, violent, and anti-Semitic speech included rote comments repeated ad
17 nauseum through megaphones that were so offensive to any Jew that it offends them to hear it,
18 eliciting memories of the Holocaust and October 7, 2023 – slogans that include "Death to Israel"
19 (the only *Jewish* nation state in the world and a common refrain of Iranian fanatics and their
20 proxies), and not surprisingly, "Death to America." Violent, hate-filled speech is not only
21 offensive and hurtful, it is dangerous and not protected by the First Amendment.

22 23 24 6. The purpose and intent of the Campus Terrorists was not to peacefully protest but to
25 terrorize, intimidate, assault, and shame Jewish Students and Faculty members and interfere with
26 their right to freely travel to and from classes, offices, and otherwise accessing other facilities at
27 the Defendant University by threats, intimidation, and coercion. All of this was done to harm
28 Plaintiffs, Jewish Students and Jewish Professors and Faculty members and create the equivalent

1 of a hostile work environment, with the knowledge, consent, and blessings of the Defendant
2 University.

3 7. The Campus Terrorists' purpose was encouraged, and aided and abetted by the Defendant
4 University. The Defendant University invited Hamas-supporting groups to speak at USC
5 notwithstanding the rampant anti-Semitism spewed by such groups; encouraged Hamas-leaning
6 and -supporting faculty members to spew anti-Semitism and hatred of Jews and the State of
7 Israel, the only Jewish country in the world. The Defendant University further permitted, aided,
8 abetted and encouraged the Campus Terrorists to paint swastikas and other painfully offensive
9 and hurtful comments on USC property while appeasing the Campus Terrorists and actually
10 listening to and considering their antisemitic demands. (<http://www.youtube.com/watch?v=XqbtOuKVV0>)
11

12 8. Defendant University allowed the Campus Terrorists to continue their anti-Semitic
13 campaign against the Defendant University's large Jewish student body and faculty unabated
14 until April 24, 2024, when the Defendant University finally allowed the Los Angeles Police
15 Department ("LAPD") to clear the Encampment and arrest 93 people on suspicion of trespassing,
16 reporting publicly that nearly half of the arrested mob members were not students attending USC
17 but rather paid "agitators" funded by the Democratic dark-money political action groups
18 identified herein above. (<http://www.youtube.com/watch?v=7ibgdWRMkgI8YB6hwmz1o>). Plaintiffs are
19 informed and believe that none of the offending students, Campus Terrorists, professional paid
20 agitators or other responsible parties – arrested or otherwise – suffered any consequences.
21
22

23 9. The Defendant University has refused to press charges or discipline offending students
24 and allows the antisemitism to fester and continue by its lame and anemic response, further
25 enabling anti-Semitism to exist and spread throughout Defendant University's USC Campus even
26 after the removal of the Encampment. For example, as of May 7, 2024, Hamas-supporting
27 protests were continuing at the Defendant University's campus, with Palestinian flags and
28

1 students or outside supporters sporting Palestinian flags and other terrorist garb, including green
2 Hamas headbands and the traditional Keffiyeh - and of course, black and white Hamas facemasks
3 and scarves to hide the Campus 'Terrorists' identities. After the Encampment was removed,
4 students and outside vendors were allowed to send emails on University sponsored or permitted
5 internet platforms to sell and encourage gullible students, faculty and other supporters to purchase
6 Keffiyehs to wear and display at individual department graduation ceremonies, all with the
7 knowledge and encouragement of the Defendant University. As of the filing of this Complaint,
8 the Palestinian flag is still proudly displayed virtually anywhere on Campus by Keffiyeh and
9 mask-wearing thugs, within sight of Figueroa Street, aided and abetted by the Campus Terrorists,
10 with the knowledge and consent of the Defendant University.

11
12 (<http://www.youtube.com/watch?v=XqbZtOuKVV0>)

13
14 10. Despite Defendant University's belated call for LAPD's intervention, the offending
15 Campus Terrorists were all released without bail to launch their attack again spurred on by
16 outside agitators funded by the Rockefeller Center, Tides, Soros Foundation and other Jew-hating
17 organizations.

18 11. The Defendant University, one of America's leading universities, has for decades been
19 one of the worst centers of academic anti-Semitism in the United States. Since October 7, 2023,
20 when Hamas terrorists invaded Israel and slaughtered, tortured, raped, burned, and mutilated
21 1200 people - including infants, children, and the elderly - anti-Semitism at Defendant
22 University has been particularly severe and pervasive. Defendant University faculty and students
23 have openly lauded Hamas' October 7 atrocities as astounding, awesome, and great feats. Mobs
24 of pro-Hamas students and faculty have marched by the hundreds to Defendant University's
25 Campus shouting antisemitic slogans, including calls for genocide, such as: Jews will not defeat
26 us; there is only one solution, intifada revolution; we will honor our martyrs; resistance is
27
28

1 justified; by any means necessary; from the river to the sea and in Arabic, from water to water
2 Palace Dean will be Arab.

3 12. These mobs have occupied Defendant University's buildings, promoted violence against
4 and restricted access to , Plaintiffs, Jewish Students and Jewish Professors and members, caused
5 cancellation of classes and commencement exercises, and harassed and assaulted Jewish Students
6 and Faculty members on campus.

7
8 13. Plaintiffs, Jewish Students and Jewish Professors and Faculty members have been spat at
9 and faculty physically assaulted, threatened and targeted on campus and social media with
10 epitaphs such as death to Jews. Defendant University has helped promulgate anti-Semitism in its
11 courses and dismissed and intimidated students who object. What is most striking about all of this
12 is Defendant University's abject failure and deliberate refusal to act to stop and deter this
13 outrageous anti-Semitic conduct and discipline the students and faculty who perpetrated it. In
14 fact, the Defendant University encouraged the conduct by its appeasement policy in the face of
15 hate speech, dangerous misconduct in other actions that it knew or should have known would
16 create the worst and most insidious hostile anti-Semitic work environment.

17
18 14. The Defendant University's anti-Semitism manifests itself in a double standard invidious
19 to Jewish Students and Faculty members. Defendant University selectively enforces its policies to
20 avoid protecting Jewish Students and Faculty members from harassment, hires professors who
21 support anti-Jewish violence and spread anti-Semitic propaganda, and ignores Jewish Students
22 and Faculty pleas for protection. Defendant University permits students and faculty to advocate
23 without consequence, the murder of Jews and the destruction of Israel, the only Jewish country in
24 the world.

25
26 15. Plaintiffs and other similarly situated Jewish Student and Faculty members, and numerous
27 others have explicitly and repeatedly warned Defendant University that its severe and pervasive
28

1 hostile anti-Semitic environment harms Jewish Students and Faculty members. In fact, Defendant
2 University has been aware of its anti-Semitism problem for years, but its response has been
3 utterly ineffective and clearly unreasonable in tolerating and even enabling anti-Semitism.
4 Defendant University has abjectly failed to enforce its policies and discipline those responsible
5 for turning Defendant University's campus into a severely hostile environment for its Jewish
6 Students and Faculty members, including the Individual Plaintiffs and other similarly situated
7 Jewish Student and Faculty members. When, in clear violation of Defendant University's
8 policies, a mob of students overtook a campus building to further their anti-Semitic agenda,
9 Defendant University's response was not to remove and discipline them, but to enable them to
10 conceal their identities by supplying them with supplies and ammunition that the mob
11 subsequently used against LAPD.

12
13
14 16. Defendant University's longtime practice when it comes to anti-Semitism—of refusing to
15 enforce its own policies against discrimination and harassment—ensured that Hamas' October 7
16 terrorist attack would enormously intensify the anti-Jewish abuse on campus. Shockingly,
17 numerous students and faculty members at Defendant University have openly endorsed Hamas
18 and the horrific October 7 massacre of Israelis it perpetrated even though: Hamas, since its
19 founding in 1987, has perpetrated numerous suicide bombings and other terrorist attacks against
20 civilians; Hamas vows to kill and destroy Jews and Israel; the U.S. State Department has
21 designated Hamas as a Foreign Terrorist Organization; and Hamas repeatedly proclaims its
22 determination to repeat the October 7 atrocities until its genocidal aims are achieved. Many of
23 Defendant University's students and faculty support Hamas and condemn Israel for defending
24 itself against Hamas' terrorist attacks—but they are never heard to condemn, let alone rally
25 against, Syria and Yemen, which have killed hundreds of thousands of Arab civilians, or
26 Pakistan, which is currently expelling almost two million Afghan Muslims, or China, which has
27
28

1 imprisoned its Muslims in reeducation camps, or countries including Somalia and Nigeria, where
2 Christians are regularly murdered (“Campus chaos and anti-Israel rhetoric reveal stark failures of
3 today’s higher education” [https://www.foxnews.com/lifestyle/campus-chaos-anti-israel-rhetoric-](https://www.foxnews.com/lifestyle/campus-chaos-anti-israel-rhetoric-reveal-stark-failures-today-higher-education)
4 [reveal-stark-failures-today-higher-education](https://www.foxnews.com/lifestyle/campus-chaos-anti-israel-rhetoric-reveal-stark-failures-today-higher-education)).

5
6 17. Subjected to intense anti-Jewish vitriol, including from their own professors and
7 Defendant University, the Individual Plaintiffs and other Jewish Students and Faculty members
8 have been deprived of the ability and opportunity to fully participate in Defendant University’s
9 educational and other programs and have been placed at severe emotional and physical risk.
10 Defendant University’s double standard extends to depriving Jewish Students and Faculty
11 members equal time to express contrasting pro-Jewish viewpoints.

12
13 18. In short, Defendant University has permitted endemic antisemitism to exclude Jewish
14 Students and Faculty members from full and equal participation in, and to deprive them of the full
15 and equal benefits of, their educational experience at Defendant University, and has invidiously
16 discriminated against them by, among other things, failing to protect them in the same way
17 Defendant University has protected other groups all based on their race, ethnicity, religion,
18 citizenship, and/or national origin. That Defendant University has done so for many years and
19 continues to do so to this day shows deliberate indifference at best, confirmed by its anemic
20 response to the anti-Semitic mobs who overtook the Defendant University and its enabling of the
21 Encampment, de-facto “passing guards” and pro-Hamas hate speech, symbols and rhetoric to
22 flourish still on its Campus. Regrettably, the Defendant University cannot be left to its own
23 devices because the Defendant University’s response has been clearly ineffective and clearly
24 unreasonable.

25
26 19. As alleged herein, Defendant University’s actions, including its deliberate indifference to,
27 and indeed enabling of, anti-Semitism on its campus, constitute an egregious violation of
28

1 California’s Bane, Unruh, and Ralph Civil Rights Acts (California Civil Code sections 51, 52.1
2 and 51.7), not to mention create a dangerous condition of public property – the Defendant
3 University’s Los Angeles Campus itself, which proximately caused the assault and battery
4 perpetrated by the mob on Plaintiffs
5

6 20. Defendant University must now be compelled to implement institutional, far-reaching,
7 and concrete remedial measures. Defendant University must also pay damages to Plaintiffs—who
8 have been robbed of their college and graduate school experience—to compensate them for the
9 hostility they have been forced to endure as a consequence of Defendant University’s unlawful
10 conduct.

11 THE PARTIES

12
13 21. Plaintiff DOE JEWISH USC FACULTY MEMBER 2004, Individually And On Behalf
14 Of All Others Similarly Situated (“Plaintiff” or “Plaintiffs” or “Jewish Professor”), is and at all
15 times herein mentioned was a tenured Jewish Professor employed by and at USC. Much like a
16 victim of sexual abuse and assault, Jewish Professor fears for Jewish Professor’s life, liberty,
17 safety and health as well as the hostile work environment caused and created by the filing of this
18 lawsuit, and in particular, the risk to Jewish Professor’s continued employment at USC if Jewish
19 Professor’s identity is publicly disclosed, or if Plaintiff is “outed” by Defendant University.
20

21 22. Plaintiff Jewish Professor is suing herein individually and on behalf of all others similarly
22 situated.

23 23. The following is Jewish Professor’s personal diary of Jewish Professor’s own highly
24 offensive, hateful, hurtful and obnoxious conduct:

25 Before October 7, 2023:

26 24. Jewish Professor was aware of the U.S. Department of Education’s Office for Civil
27 Rights’ Title VI investigation into allegations of antisemitism at USC after a Jewish student
28

1 resigned from her position as student government vice president in August 2020, after being
2 targeted for discrimination because of her perceived Jewish identity. Jewish Professor was also
3 aware of the antisemitic student and faculty organizations, speakers, professors and other hate
4 mongers USC allowed to flourish and grow whose purpose was to spread Hamas propaganda and
5 other dogma and ideology. Among the other lies promulgated by such hateful organizations,
6 speakers, professors and other hate mongers is their specious claim that Israel - and the Jews that
7 inhabit only a fraction of the only democratic, multi-ethnic, religious and racial Jewish nation-
8 state in the world - are “oppressors” against the “oppressed.”

9
10 After October 7, 2023:

11 25. After October 7, I personally witnessed several incidents of students and other individuals
12 removing posters of kidnapped Israeli civilians who are being held hostage in Gaza.

13
14 26. In February 2024, three student groups – Students for Justice in Palestine (SJP), the Palestinian
15 Youth Movement and Dissenters – held a vigil for Palestine and launched the “National Divestment
16 Campaign,” calling on the University to divest from Israel and saying “We know that USC is very
17 complicit in violence.”

18 27. I have personal knowledge that complaints have been lodged against some professors for
19 allegedly promoting antisemitic and anti-Zionist content online, and Jewish students — particularly in
20 the law and medical schools — have also publicly reported being targeted with online harassment.

21
22 28. The level of antisemitism rose to unprecedented levels In April 2024, when USC President
23 Carol Folt announced the nomination of Muslim student Asna Tabassum (“Tabassum”) as the USC
24 valedictorian. Defendant University knew or certainly should have known that Tabassum's social
25 media was replete with anti-Israel propaganda and violent hate speech when an email was sent out by
26 Provost Guzman to keep her as valedictorian yet not allow her to speak. That was the turning point
27 that led to the creation of campus anti-Israel encampments and a level of open antisemitic vitriol that I
28

1 have never previously experienced. Encampments calling for "death to Israel, death to America" and
2 even "death to Jews" were growing in numbers and I could not get to my office without being accosted
3 by protestors asking me "Are you a Zionist"?? "Do you support the Israeli death war machine???" I
4 endured this for about three (3) until I was spat on by one of these thugs. After that, I decided that I
5 would not return to campus again until this came to an end. What is all the more disturbing is the
6 number of faculty members who openly protest with the students and some even cancelling their final
7 exams so that the students can protest daily.

9 29. As a Jewish faculty member, I feel targeted, scapegoated, and abandoned by the principles that
10 USC claims to espouse by its written and traditional policies. I did try to get to my office on May 2,
11 2024 only to be heckled again crossing Trousdale Pkwy by protestors asking again if I "supported the
12 Zionist entity." I refused to engage. On my way back to my car, I was approached by a female
13 protester asking if I wanted to participate in a "bake sale for Palestine" to help feed the children that
14 Israel is intentionally starving. Again, I kept walking and refused to engage.

16 30. I feared for my safety and life as a result of the Campus Terrorists and former Encampment
17 and currently fear for my safety as a result of the current antisemitic acts and actions taken and not
18 taken by Defendant University in the face of continued antisemitic mobs flourishing at and taking over
19 USC's Campus - dangerous, threatening "pro-Hamas" mobs who in fact spew violent hate speech
20 against Jews, Israel and America. There appears to be a continuing and growing antisemitism and
21 terrorist threat on Campus, which makes me and other Jewish Professors anxious and apprehensive.
22 All the while, Defendant University continues to acquiescence to, appease, aid and abet and encourage
23 what has become an antisemitic mob gaining mass appeal and further support by non-Jewish students
24 and faculty alike

26 31. Simply stated, what we are witnessing is history repeating itself. The Holocaust in essence
27 began at the universities in Germany when the Nazis prevented Jewish students from entering the
28

1 campus and then forced out the Jewish professors. When our pathways are blocked and we are granted
2 entry only when we attest that we do not support Israel, how are we free to both express our Jewish
3 identity and perform our jobs at USC?

4 32. Accordingly, Jewish Professor's and Plaintiffs' fear and anxiety is real and justified.

5 33. Defendant University is a California private public benefit corporation, controlled by its Board
6 of Trustees.

7 34. The true names and capacities of defendants named herein as "DOES 1 through
8 100, inclusive," are presently unknown to Plaintiffs. Plaintiffs will amend this Complaint to
9 insert their true identities as soon as they are ascertained.

10 30. The true names and capacities of defendants named herein as "DOES 1 through 100" are presently
11 unknown to Plaintiffs. Plaintiffs will amend this Complaint to insert their true identities as soon as
12 they are ascertained.

13 31. Each defendant is the agent of his or her co-defendant and in doing the things complained of
14 herein was acting withing the scope of such agency.

15 CLASS ACTION ALLEGATIONS

16 32. This is a class action filed pursuant to the provisions of Code of Civil Procedure section
17 382, which provides in pertinent part:

18 "[W]hen the parties are numerous, and it is impracticable to bring them all before
19 the court, one or more may sue or defend for the benefit of all."

20 33. Jewish Professor sues in Jewish Professor's individual capacity as a Jewish USC Professor
21 who suffered harm as a result of Defendant University's conduct and as a representative on
22 behalf of all other similarly situated Jewish Professors.

23 34. Plaintiffs will seek leave of Court to amend this Complaint to also include a subclass of
24 Jewish USC students.

25
26
27
28

1 35. The class is ascertainable and sufficiently numerous. Plaintiff is informed and believes there
2 are over 7,000 full-time USC faculty members and a substantial number are similarly situated
3 Jewish faculty members.

4 36. The Jewish Professors and Faculty members share the same common interest of wanting to be
5 safe and free from campus terrorism and anti-Semitism, and safe and free from other harm,
6 including assault and battery. Plaintiffs also have common interests of freedom of travel,
7 access, and passage, and freedom to practice their religion without discrimination or
8 discriminatory practices.

9 37. Judicial economy and efficiency will be best served by treating and certifying this matter as a
10 class action given the numerosity of Plaintiffs, common issues of fact and law involved, and
11 related issues.
12

13 38. This case is not subject to removal to federal court under the Class Action Fairness Act
14 because this matter presents a home state or local controversy involving California
15 discrimination statutes and law and California and Los Angeles based Jewish USC Professors
16 and other Faculty members.
17

18 FIRST CAUSE OF ACTION FOR VIOLATION OF THE BANE CIVIL RIGHTS ACT
19 (CALIFORNIA CIVIL CODE SECTIONS 52.1) AGAINST DEFENDANT UNIVERSITY AND
20 DOES 1 THROUGH 10, INCLUSIVE
21

22 39. At all times herein mentioned, Defendant University had a duty to protect Plaintiffs from
23 physical and psychological and emotional harm on Campus and to protect Plaintiffs from
24 discrimination and anti-Semitism. Plaintiffs also had the right to practice their Jewish faith
25 and in so doing to be free while on campus from threats, intimidation, or coercion, .

26 40. The essence of a Bane Act claim (California Civil code section 52.1) is that the defendant, by
27 improper means – threats, intimidation, or coercion – tried to or did prevent the plaintiff from
28

1 doing something he or she had the right to do under the law (attend school discrimination-free
2 and free from physical harm and terrorism) or to force the plaintiff to do something he or she
3 was not required to do under the law (such as unlawfully force Plaintiffs to study remotely
4 while terrorists ran amok at the Defendant University). *Venegas v. County of Los Angeles*
5 (2004) 32 Cal. 4th 820, 841-43; *Austin B. v. Escondido Union Sch. Dist.* (2007) 149 Cal. App.
6 4th 860, 883.
7

8 41. In this case, Defendant University improperly permitted a dangerous condition to exist on the
9 Defendant University's USC Campus by enabling, encouraging, permitting, negotiating with,
10 and aiding and abetting the Campus Terrorists, as alleged herein above, endangering the life,
11 liberty, and property and dignity of Jewish Students and Faculty members.

12 42. At all times herein mentioned, Defendant University interfered with Plaintiffs' civil rights by
13 creating a dangerous condition on campus and encouraging and enabling the Campus
14 Terrorists and permitting them to set up the Encampment to threaten Jewish Students and
15 Faculty for the purpose of committing or threatening to commit violent acts against them.

16 43. At all times herein mentioned, Plaintiffs reasonably believed that if they exercised their
17 Jewish faith or identified themselves as being Jewish or Israeli, the Campus Terrorists would
18 commit violence against them or their property.
19

20 44. The Campus Terrorists, with the permission and consent of Defendant University, injured
21 Plaintiffs and their property for the purpose of preventing them from exercising their right to
22 freedom of religion, faith and race, or to retaliate against them for having exercised such
23 rights.
24

25 45. Defendant University violated the Banc Act by preventing Plaintiffs from gaining free access
26 to a safe environment that non-Jewish Students and Faculty have. The Defendant University
27
28

1 created a hostile working environment as a result of the jew-hating vitriol spewed by the
2 Campus Terrorists and allowed to continue on Campus.

3 46. Plaintiffs were harmed as a direct and proximate result of Defendant University's violation of
4 the Bane Act.

5
6 47. Defendant University's conduct – and in particular its knowledge and consent of the Campus
7 Terrorists' avowed purpose and its decision to enable, encourage, aid, abet, negotiate with and
8 appease the Campus Terrorists and allow the Encampment to continue and the antisemitism to
9 fester and grow for weeks on end -- was a substantial factor in bringing about Plaintiffs' harm.

10 SECOND CAUSE OF ACTION FOR VIOLATION OF THE UNRUH CIVIL RIGHTS ACT
11 (CALIFORNIA CIVIL CODE SECTIONS 51, 52) AGAINST DEFENDANT UNIVERSITY
12 AND DOES 1 THROUGH 10, INCLUSIVE

13
14 48. Plaintiffs reincorporate paragraphs 1 through 47 of this Complaint as though fully set forth at
15 length herein.

16 49. At all times herein mentioned, the Defendant University denied Plaintiffs equal
17 accommodations, advantages, facilities, privileges and services that other similarly situated
18 University Students and Faculty enjoy simply because they are Jewish or Israeli.

19 50. Defendant University's conduct, as alleged herein, denied, aided and abetted, incited a denial
20 of or made a distinction that denied full and equal accommodations, advantages, facilities,
21 privileges and services to Jewish Students and Faculty members.

22
23 51. A motivating reason for Defendant University's conduct was its perception and the perception
24 of the Campus Terrorists that Plaintiffs are Jewish.

25 52. Plaintiffs' Jewish faith and race and Israeli origin was a motivating reason for the conduct of
26 the Campus Terrorists and Encampment that Defendant University allowed and permitted to
27 continue for weeks on end.
28

1 53. Plaintiffs were harmed as a result of Defendant University's conduct.

2 54. Defendant University's conduct was a substantial factor in causing Plaintiffs' harm.

3
4
5
6 THIRD CAUSE OF ACTION FOR VIOLATION OF THE RALPH CIVIL RIGHTS ACT
7 (CALIFORNIA CIVIL CODE SECTION 51.7) AGAINST DEFENDANT UNIVERSITY AND
8 DOES 1 THROUGH 10, INCLUSIVE

9 55. Plaintiffs reincorporate paragraphs 48 through 54 of this Complaint as though fully set forth
10 at length herein.

11 56. At all times herein mentioned, the Campus Terrorists committed acts of violence or
12 threatened to commit acts of violence against Plaintiffs herein because of their religion and
13 race.

14
15 57. Defendant University had actual knowledge of the violence and threats but allowed and
16 permitted the Campus Terrorists to continue to threaten violence and commit acts of violence
17 against Plaintiffs for weeks on end before standing up to them, encouraging, appeasing and
18 negotiating with the Campus Terrorists and allowing the Encampment to remain on Campus
19 in plain view of the Jewish Students and Faculty members.

20
21 58. The motivating and avowed purpose of the Campus Terrorists and Encampment was to spew
22 antisemitism epithets at Jewish Students and Faculty and commit violence or make threats of
23 violence to Jewish Students and Faculty.

24 59. Plaintiffs were harmed as a result of Defendant University's conduct and encouragement of
25 the discriminatory practices and threats of violence.

26 60. Defendant University's conduct was a substantial factor in bringing about Plaintiffs' harm.

27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

FOURTH CAUSE OF ACTION FOR NEGLIGENCE AGAINST DEFENDANT

UNIVERSITY AND DOES 1 THROUGH 10, INCLUSIVE

61. Plaintiffs reincorporate paragraphs 55 through 60 of this Complaint as though fully set forth at length herein.

62. At all times herein mentioned, Defendant University had a duty of care to provide a safe and sane environment and workspace for Jewish Students and Faculty members.

63. Beginning in or about Spring of 2024 and continuing to the present time, Defendant University created, permitted, allowed, enabled and condoned a dangerous condition to occur on University property, as more particularly alleged herein above.

64. Defendant University breached its duty of care to Jewish Students and Faculty members by allowing the Campus Terrorists to continue on with their reign of terror for weeks on end before capitulating on or about May 5, 2024, when they called LAPD in to remove the Encampment.

65. As a direct and proximate result of Defendant University's negligence and breach of its duty of care to provide a safe and sane environment and workspace for Jewish Students and Faculty members, Plaintiffs were harmed.

66. Defendant University's negligence was a substantial factor in bringing about the harm sustained by Plaintiffs.

FIFTH CAUSE OF ACTION FOR BREACH OF CONTRACT AGAINST DEFENDANT

UNIVERSITY AND DOES 1 THROUGH 10, INCLUSIVE

67. Plaintiffs reincorporate paragraphs 61 through 66 of this Complaint as though fully set forth at length herein.

1 68. Plaintiffs paid over \$200,000 to attend four years at Defendant University in consideration for
2 a reasonable expectation that they would be able to study in a safe and sane environment and
3 workplace at the Defendant University.

4 69. At all times herein mentioned, Defendant University had a contractual duty to provide a safe
5 and sane environment and workspace for Jewish Students and Faculty members.

6 70. Beginning in or about Spring of 2024 and continuing to the present time, Defendant
7 University breached its contractual duty to Plaintiffs by creating, permitting, allowing,
8 enabling and condoning a dangerous condition to occur on University property, as more
9 particularly alleged herein above.

10 71. At all times herein mentioned, Plaintiffs performed all conditions they were required to
11 perform with respect to their contract with Defendant University and paid the Defendant
12 University the tuition required.

13 72. As a direct and proximate result of Defendant University's breach of its contractual
14 obligations to Plaintiffs, Plaintiffs have been harmed.

15 SIXTH CAUSE OF ACTION FOR ASSAULT AGAINST DEFENDANT UNIVERSITY
16 AND DOES 1 THROUGH 10, INCLUSIVE

17 73. Plaintiffs reincorporate paragraphs 67 through 72 of this Complaint as though fully set forth
18 at length herein.

19 74. At all times herein mentioned, the Campus Terrorists' conduct and the actions permitted and
20 encouraged by Defendant University, as alleged herein, intended to cause harmful and
21 offensive contact with Plaintiffs.

22 75. At all times herein mentioned, Plaintiffs reasonably believed that the Campus Terrorists were
23 about to touch them in a harmful or offensive manner and in fact threatened to touch them in
24 a harmful manner, screaming slogans like "Death to Israel," "Death to Jews," Death to
25
26
27
28

1 America.” The Defendant University encouraged the Campus Terrorists to continue spewing
2 hate-filled threats at Jewish Students and Faculty members by allowing the Encampment and
3 takeover of University property.

4 76. At all times herein mentioned, it reasonably appeared to Plaintiffs that the Campus Terrorists
5 were about to carry out their threats.

6 77. Plaintiffs did not consent to the conduct of the Campus Terrorists or the Encampment.

7 78. As a direct result of the conduct of Defendant University, Plaintiffs were harmed.

8 79. Defendant University’s conduct was a substantial factor in causing Plaintiffs’ harm.

9
10 SEVENTH CAUSE OF ACTION FOR BATTERY AGAINST DEFENDANT

11 UNIVERSITY AND DOES 1 THROUGH 10, INCLUSIVE

12 80. Plaintiffs reincorporate paragraphs 73 through 79 of this Complaint as though fully set forth
13 at length herein.

14 81. At various times from April 2024 through May 5, 2024, the Campus Terrorists touched or
15 caused Plaintiffs to be touched with the intent to harm or offend them.

16 82. Plaintiffs never consented to the harmful and offensive touching.

17 83. The harmful and offensive touching was allowed, permitted, encouraged and made possible
18 by the Defendant University’s conduct, as alleged herein above.

19 84. Plaintiffs were harmed as a result of the harmful and offensive touching.

20 85. A reasonable person in Plaintiffs’ situation would have been offended by the touching by the
21 Campus Terrorists.

22 EIGHTH CAUSE OF ACTION FOR DECLARATORY RELIEF AGAINST DEFENDANT

23 UNIVERSITY AND DOES 1 THROUGH 10, INCLUSIVE

24 86. Plaintiffs reincorporate paragraphs 80 through 85 of this Complaint as though fully set forth
25 at length herein.

26
27
28

1 87. An actual controversy has arisen and now exists between Plaintiffs and Defendant University
2 in that Plaintiffs contend that Defendant University has created a dangerous condition of
3 public property and further contends that Defendant University encourages, permits, aids,
4 abets, appeases and condones rampant unlawful antisemitism and discrimination to occur on
5 its campus against Jewish Students and Faculty members, whereas Defendant denies such
6 contentions.
7

8 88. A judicial declaration is necessary and appropriate at this time so that the parties can ascertain
9 their respective rights and liabilities.

10 NINTH CAUSE OF ACTION FOR INJUNCTIVE RELIEF AGAINST DEFENDANT
11 UNIVERSITY AND DOES 1 THROUGH 10, INCLUSIVE

12 89. Plaintiffs reincorporate paragraphs 86 through 88 of this Complaint as though fully set forth
13 at length herein.
14

15 90. The statutory scheme contemplated by Civil Code sections 51 et seq. gives the Court the
16 power to fashion an injunction to remedy future discriminatory practices as necessary.

17 91. Plaintiffs herein seek a temporary restraining order, preliminary and permanent injunction:

- 18 - to enjoin and prevent Defendant University from continuing to create and sponsor a
19 dangerous condition of public property;
- 20 - to enjoin and prevent Defendant University from continuing to support antisemitic and
21 discriminatory conduct on campus, as well as Defendant University's continuing
22 encouragement and rampant support for the Campus Terrorists, Hamas and other Jew-
23 hating organizations and groups; and
- 24 - to enjoin and prevent outside funding by antisemitic groups and organizations who require
25 the Defendant University to march to beat of an antisemitic drummer as opposed to the
26 laws forbidding antisemitism and discrimination.
27
28

1 WHEREFORE, Plaintiffs pray for judgment as follows:

2 **On the First, Second, Third, Fourth, Fifth and Seventh Causes of Action:**

- 3 1. For damages in an amount in excess of the jurisdictional limits of this Court to be shown
4 at the time of trial in accordance with proof;

5 **On the Eighth Cause of Action:**

- 6 2. For a judicial declaration setting forth the respective rights and liabilities of the parties;

7 **On the First, Second, Third and Ninth Causes of Action:**

- 8 1. For a temporary restraining order, preliminary and permanent injunction:
9 - to enjoin and prevent Defendant University from continuing to create and sponsor a
10 dangerous condition of public property;
11 - to enjoin and prevent Defendant University from continuing to support antisemitic and
12 discriminatory conduct on campus, as well as Defendant University's continuing
13 encouragement and rampant support for the Campus Terrorists, Hamas and other Jew-
14 hating organizations and groups; and
15 - to enjoin and prevent outside funding by antisemitic groups and organizations who require
16 the Defendant University to march to beat of an antisemitic drummer as opposed to the
17 laws forbidding antisemitism and discrimination.
18
19
20
21
22
23
24
25
26
27
28

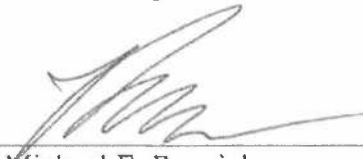
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

On All Causes of Action:

1. For reasonable attorney’s fees;
2. For the costs of suit incurred; and
3. For such other and further relief as the Court deems just and proper.

DATED: May 14, 2024

LAW OFFICES OF MICHAEL E. REZNICK
A Professional Corporation

By:  _____
Michael E. Reznick

Attorney for Plaintiffs LIANA NITKA, Individually
And on Behalf of All Others Similarly Situated