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16 * *Application for admission*
pro hac vice forthcoming
17
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19 **UNITED STATES DISTRICT COURT**
20 **CENTRAL DISTRICT OF CALIFORNIA**
21

22 MATTHEW WEINBERG,
RABBI DOVID GUREVICH,
23 NIR HOFTMAN,
24 ELI TSIVES,

Plaintiffs,
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v.
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27 NATIONAL STUDENTS FOR JUSTICE
IN PALESTINE,
28 JOHN DOE #1, PRESIDENT OF THE
UCLA CHAPTER OF SJP,

Case No. 2: 25-cv-03714

**COMPLAINT FOR
DAMAGES AND JURY
TRIAL DEMAND**

1 AJP EDUCATIONAL FOUNDATION,
INC., D/B/A AMERICAN MUSLIMS FOR
2 PALESTINE,
OSAMA ABURSHAD,
3 HATEM AL-BAZIAN,
FACULTY FOR JUSTICE IN PALESTINE
4 NETWORK,
UC DIVEST COALITION,
5 WESPAC FOUNDATION,
PEOPLE'S CITY COUNCIL,

6 *Defendants.*

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1 1. On October 7, 2023, the foreign terrorist organization Hamas
2 launched a brutal attack on Israel that “resulted in the murder of nearly
3 1,200 people,” including “more than 40 American citizens.” Staff of H.
4 Comm. on Educ. and the Workforce, 118th Cong., *Antisemitism on College*
5 *Campuses Exposed* 1, (Comm. Print 2024), perma.cc/6Y4U-52HG.

6 2. “In the aftermath of that horrific event, American institutions
7 of higher education were upended by an epidemic of hate, violence, and
8 harassment targeting Jewish students.” *Id.* Students, faculty, and other
9 members of campus Jewish communities “faced an unrelenting barrage of
10 discrimination; denial of access to campus common areas and facilities,
11 including libraries and classrooms; and intimidation, harassment, and
12 physical threats and assault.” Exec. Order No. 14188, *Additional Measures*
13 *to Combat Anti-Semitism*, 90 Fed. Reg. 8847, 8847 (Feb. 3, 2025); *see also*
14 Louis D. Brandeis Center for Human Rights Under Law, *Public Interest*
15 *Law Firm Launched to Specialize in Anti-Semitism Litigation* (Feb. 6,
16 2025), perma.cc/AQ83-PNKS (describing a surge in antisemitic incidents
17 after October 7).

18 3. Every branch of government has recognized the ongoing
19 campus antisemitism crisis. *See* Staff of H. Comms., 118th Cong., *House*
20 *Antisemitism Staff Report* (Dec. 18, 2024), perma.cc/9NWV-2VWJ
21 (collecting six House committees’ findings); Exec. Order No. 14188, 90 Fed.
22 Reg. 8847-48 (reiterating President Trump’s commitment to combatting
23 antisemitism on college campuses); *Frankel v. Regents of the Univ. of Cal.*,
24 744 F. Supp. 3d 1015, 1025-26 (C.D. Cal. 2024) (ruling that UCLA’s failure
25 to protect Jewish students’ equal access to campus likely violated the
26 Constitution).

27 4. Consistent with these findings, the Department of Justice
28 recently launched a “multi-agency Task Force to Combat Anti-Semitism.”

1 *Justice Department Announces Formation of Task Force to Combat Anti-*
2 *Semitism*, Dep’t of Just. (Feb. 3, 2025), perma.cc/5RG9-T54U. The Task
3 Force’s first objective is “to eradicate antisemitic harassment in schools
4 and on college campuses.” *Federal Task Force to Combat Antisemitism*
5 *Announces Visits to 10 College Campuses that Experienced Incidents of*
6 *Antisemitism*, Dep’t of Just. (Feb. 28, 2025), perma.cc/6YAR-FZRA.
7 Perhaps unsurprisingly, the Task Force is investigating whether UCLA
8 engaged in a “pattern or practice” of unlawful discrimination “by allowing
9 an Antisemitic hostile work environment to exist on its campuses.” *U.S.*
10 *Justice Department Launches Investigation of University of California*
11 *Under Title VII of the Civil Rights Act of 1964*, Dep’t of Just. (Mar. 5, 2025),
12 perma.cc/Z58G-9AGN.

13 NATURE OF THE ACTION

14 5. This case is about a particularly shocking chapter of America’s
15 campus antisemitism epidemic—a coordinated campaign of egregious acts
16 of racial exclusion, intimidation, and assault conducted by a web of
17 organizations and individuals working in concert to intimidate Jewish
18 students, faculty, and staff.

19 6. The radicals behind this campaign (often styled as a movement
20 to “globalize the student intifada”) designed, promoted, and executed a
21 plan to prevent Jewish communities on college campuses from enjoying
22 equal access to public spaces by means of racialized violence.

23 7. The conspiracy’s calling card is the so-called “autonomous zone”
24 or campus encampment. These fortified camps are organized by a core of
25 virulently antisemitic radicals and leftist paramilitary groups. The radical
26 core constructs and supplies the encampment, recruits volunteers to join
27 and defend it, and provides those recruits with the equipment and training
28 necessary to exert physical control over “occupied” public spaces. The

1 result is that wherever such an encampment appears, a “Jew exclusion
2 zone” enforced by threats, intimidation, and violence is not far behind. *See*,
3 *e.g.*, *Frankel*, 744 F. Supp. 3d at 1020, 1025.

4 8. UCLA has been the repeated target of these terroristic tactics,
5 which have proven sadly effective in rendering campus a hostile
6 environment for Jews. Last year, large majorities of the UCLA Jewish
7 community reported that antisemitism had worsened or significantly
8 worsened since October 7. *See* Task Force to Combat Antisemitism and
9 Anti-Israeli Bias, *Antisemitism and Anti-Israeli Bias at UCLA* 23 (Oct. 16,
10 2024), perma.cc/2CED-UAJ6. A major source of this increased fear and
11 apprehension was the presence, between April 25 and May 2, 2024, of a
12 “violent, antisemitic encampment” centered on Dickson Plaza/Royce Quad.
13 *Antisemitism on College Campuses Exposed* at 1; *see also id.* at 24-30, 32,
14 68-69; *Antisemitism and Anti-Israeli Bias at UCLA* at 25-27.

15 9. The UCLA encampment, like its contemporaries on college
16 campuses around the country, was a festering sore of antisemitism and
17 racial exclusion. Members of the encampment “occupied” a university
18 building and restyled it “Intifada Hall”:



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10. The encampment also established “checkpoints” and “human phalanxes” that “denied Jewish students access to areas of campus,” including Powell Library and Royce Hall. *See Antisemitism on College Campuses Exposed* at 1, 24-30, 32, 68-69; *Antisemitism and Anti-Israeli Bias at UCLA* at 53-54, 56; *Frankel*, 744 F. Supp. 3d at 1020, 1025-27.

11. Together, these measures amounted to a “Jew exclusion zone” backed by the concrete threat of physical violence. *E.g.*, Compl. ¶6 (Dkt. 1), *Frankel*, No. 2:24-cv-04702-MCS-PD (C.D. Cal.). To “defend” the zone, members of the encampment organized into teams of “security” personnel armed with wooden planks, makeshift shields, pepper spray, tasers, and even a sword. *See Antisemitism and Anti-Israeli Bias at UCLA* at 58. The primary purpose of these teams was to intimidate members of the Jewish community and deny them access to “occupied” territory using “checkpoints” and “human phalanxes.” *Id.* at 53, 58.

12. Over time, threats of violence escalated into actual violence. *See id.* at 53 & n.105, 57-58 (describing the child of a holocaust survivor who was sprayed with pepper spray, a Native American Jewish woman who was assaulted with a stick, and a Jewish student who was knocked unconscious, suffering a serious head wound); *This is Total Lawlessness and Anarchy*, Fox News (Apr. 29, 2024), perma.cc/7M2C-FF6X (interview with Plaintiff Nir Hoftman, a Jewish UCLA professor who was tackled and robbed by a member of the encampment). First-hand accounts also reported large, organized groups of violent nonstudents who would emerge from the encampment to chase out anyone who waived an Israeli flag or otherwise showed support for Jews and Israel.

13. Based on these events, this Court recently found that “Jewish students were excluded from portions of the UCLA campus” that were

1 “occupied” by the encampment. *Frankel*, 744 F. Supp. 3d at 1020-21.
2 *Frankel* was about UCLA’s woefully inadequate response to a coordinated
3 campaign of violent racial exclusion. In that case, UCLA has contended
4 that this campaign of racial exclusion was “engineered by third-party
5 protestors.” *Frankel*, 744 F. Supp. 3d at 1020.

6 14. This case is about those third parties—organizations and
7 individuals responsible for prosecuting that campaign in the first place.
8 Defendants planned, constructed, supplied, recruited for, and “defended”
9 the encampment knowing that it was based on class-based animus and
10 that its purpose and effect was to exclude Jewish students, faculty, and
11 staff from public spaces using violence and the threat of violence.

12 15. The sad truth is that Defendants created and maintained a
13 weeklong “Jew exclusion zone” on a public university campus. But even
14 after UCLA finally cleared the encampment, Defendants continued their
15 campaign of harassment and exclusion, attempting to establish new
16 encampments, targeting buildings named after prominent Jews, and
17 blocking access to graduate school facilities.

18 16. For example, on May 6, 2024, more than 40 people (including
19 several who had been arrested at the encampment) were taken into
20 custody after UCLA police discovered them massing in a garage with metal
21 pipes, bolt cutters, chains and padlocks, and a “Do-It-Yourself Occupation
22 Guide.” *Statement Regarding the Incidents on Monday, May 6, 2024*,
23 UCLA Police Dep’t (May 8, 2024), perma.cc/3DFJ-WKXG.

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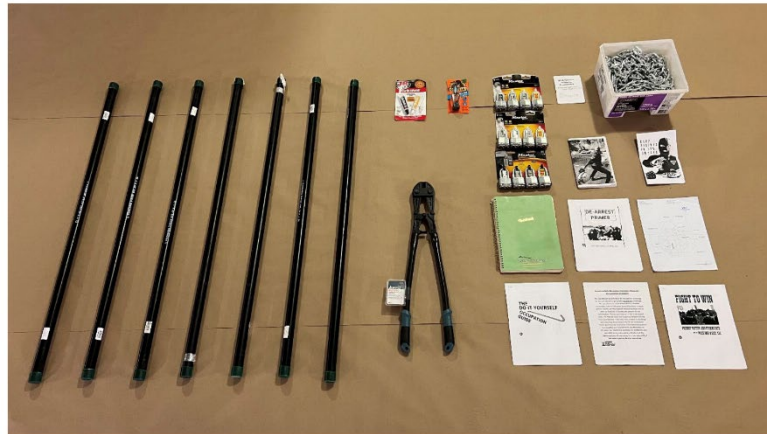
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Photos



Metal pipes (left), epoxy adhesive and super glue (top center), padlocks (top center), bolt cutters (bottom center), heavy duty chains (top right), documentation encouraging violence and vandalism (bottom right)

17. Police later determined that the group was planning to “occupy” and vandalize Moore Hall, which Defendant Students for Justice in Palestine (echoing its tactics at the encampment the previous week) had urged its supporters to “mobilize” to that morning:



18. A month later, Defendants tried again. A group of around 100 people “marched to the walkway at the top of the Janss Steps and set up an unauthorized and unlawful encampment with tents, canopies, wooden

1 shields, and water-filled barriers.” *Statement Regarding the Unlawful*
2 *Encampments and Subsequent Arrests on Monday, June 10, 2024*, UCLA
3 Police Dep’t (June 10, 2024), perma.cc/V5KA-G83L. The group “restricted
4 access to the general public in violation of University policy” and
5 “disrupted nearby final exams.” *Id.* After police dispersed the encampment
6 at the steps, the group marched first to Kerckhoff Patio and then to the
7 courtyard between Dodd Hall and UCLA Law School. At each location, the
8 group “set up another unauthorized and unlawful encampment” that
9 improperly restricted access to the public and disrupted nearby final
10 exams. *Id.* Later that day, members of the group assaulted and threatened
11 to kill Plaintiff Dovid Gurevich, a Chabad rabbi who was at the scene to
12 support Jewish students. *See* Bandler, *UCLA Chabad Rabbi Assaulted by*
13 *Pro-Palestinian Protesters*, *Jewish Journal* (June 11, 2024),
14 perma.cc/KL93-4GJB.

15 19. On February 12, 2025, the UCLA chapter of SJP was
16 suspended after a university investigation concluded that the organization
17 had been involved in a similarly threatening campaign at the home of UC
18 Regent Jay Sures. Echoing their tactics at the various encampments,
19 individuals affiliated with SJP surrounded the vehicle of a Sures family
20 member and prevented that family member’s free movement. UCLA
21 officials recently recommended indefinitely revoking campus organization
22 status for SJP’s undergraduate arm and imposing serious sanctions on its
23 graduate-student arm.

24 20. Throughout, UCLA’s Jewish community has been left to bear
25 the lasting pain of having been harassed, assaulted, and excluded from
26 campus merely because they are Jews. *See, e.g., Antisemitism and Anti-*
27 *Israeli Bias at UCLA at 23, 25-27.*

28

1 21. In sum, Defendants have engaged in a long-running
2 antisemitic conspiracy to deny Jews equal access to UCLA's campus. And
3 for roughly a week in Spring 2024, Defendants succeeded in doing so by
4 enforcing a "Jew exclusion zone" centered on an encampment "occupying"
5 the area around Dickson Plaza/Royce Quad.

6 22. After UCLA belatedly cleared the encampment, Defendants
7 conspired to reestablish it and unabashedly renewed their efforts to ensure
8 that UCLA's campus would be unsafe for any member of the UCLA Jewish
9 community. By denying Jews equal access to public spaces on campus and
10 subjecting them to racialized violence, Defendants violated federal and
11 California law. Plaintiffs are entitled to relief.

12 **JURISDICTION AND VENUE**

13 23. This Court has subject-matter jurisdiction. *See* 28 U.S.C.
14 §§1331, 1343, 1367. The Court has jurisdiction over Plaintiffs' federal
15 claims because Plaintiffs seek to recover for violations of their civil rights
16 that "aris[e] under the Constitution [and the] laws ... of the United States."
17 *Id.* §1331; *see also id.* §1343 (granting district courts original jurisdiction
18 over §1985 claims). And the Court has supplemental jurisdiction over
19 Plaintiffs' state-law claims because they arise out of the same events and
20 thus "form part of the same case or controversy." *Id.* §1367(a).

21 24. Venue is proper under 28 U.S.C. §1391(b)(2) because "a
22 substantial part of the events or omissions giving rise to [Plaintiffs' claims]
23 occurred" in the Central District of California, specifically in and around
24 the City of Los Angeles and on UCLA's campus. *See, e.g., Frankel*, No. 2:24-
25 cv-04702-MCS-PD (C.D. Cal.).

1 **THE PARTIES**

2 **Plaintiffs**

3 25. Plaintiff Nir Hoftman is a doctor at UCLA who has taught at
4 the university's medical school for over 22 years. Hoftman is a Jew.

5 26. On April 28, 2024, Hoftman was assaulted by several members
6 of the encampment's "security" team for the offense of being a Jew walking
7 in an "occupied" area. As Hoftman conducted an interview while walking
8 towards the encampment, two or three individuals affiliated with the
9 encampment moved to block his path. Though he initially tried to ignore
10 them, one individual stood directly in front of Hoftman and told him that
11 he could not keep walking in that direction. When Hoftman attempted to
12 walk around, he was tackled, causing one of his earbuds to fly out of his
13 ear. Dazed, Hoftman returned to his feet and briefly searched for his
14 earbud. When he couldn't locate the earbud quickly, Hoftman left the area
15 to report the assault to police, thinking that it must have been lost in
16 nearby foliage.

17 27. Later that day, after Hoftman had called 911 and reported the
18 incident to UCLA police, he used an app on his phone to track the lost
19 earbud. Based on the tracking information, Hoftman determined that the
20 earbud was moving around inside the encampment and that, rather than
21 having been lost, it had been stolen by one of his attackers.

22 28. The attack left Hoftman deeply disturbed and afraid to go
23 anywhere near the encampment. He was saddened to learn that, to
24 members of the encampment, giving an interview that made clear he was
25 Jewish and supported Israel was sufficient grounds to deny him access to
26 an "occupied" public space. And he was shocked that the encampment's
27 "security" personnel were ready and willing to use violence to deny Jews
28 like himself access to the encampment and nearby public spaces.

1 29. After the attack, Hoftman stayed away from the encampment
2 until police finally cleared it on May 2. Although he would have preferred
3 to continue to show up in support UCLA’s Jewish community, Hoftman’s
4 experience with the encampment’s “security teams” proved that Jews were
5 unwelcome and unsafe in areas that Defendants had “occupied” and that
6 these “security” personnel were willing to range far afield from the core of
7 the encampment to deny access to and attack perceived enemies. The
8 prospect of a replay of the assault, or worse, created an unacceptable risk
9 to Hoftman’s safety.

10 30. In short, Hoftman was injured, both physically and materially,
11 because he sought to exercise his right as a member of the university’s
12 Jewish community to visit a public space on campus. And he was excluded,
13 on threat of violence, from a public space on campus that he would
14 otherwise have visited. Hoftman was shocked, appalled, and frustrated
15 that all this happened simply because he is a Jew.

16 31. Plaintiff Matthew Weinberg is a second-year law student at
17 UCLA. Weinberg is a Jew.

18 32. Between April 25 and May 2, Defendants conspired to (and did)
19 severely curtail Weinberg’s ability to access the “occupied” territory near
20 Dickson Plaza/Royce Quad because of his status as a Jew. Weinberg knew
21 from press coverage and conversations with friends that members of the
22 encampment were willing to use violence to enforce their control over the
23 area. And he knew that, because he is a Jew and supports Israel, members
24 of the encampment would consider him an enemy and prevent him from
25 passing through any space (public or otherwise) that they controlled.

26 33. Based on this knowledge, Weinberg feared that appearing at or
27 traveling through the part of campus over which Defendants had conspired
28 to exercise control would threaten his physical safety. That reaction was

1 natural and correct: The encampment was a fortified camp at the center of
2 a vortex of radical antisemitism (including “occupied” “intifada hall,”
3 antisemitic graffiti, and chants of eliminationist slogans like “kill all the
4 Jews” and “From the River to the Sea”). And it was “defended” by a large
5 group of “security” personnel which had shown no qualms about using
6 violence against those they perceived as enemies (i.e., Jews and law
7 enforcement).

8 34. Weinberg feared that if he tried to go to any of the UCLA
9 facilities near the encampment (including Powell Library, which students
10 often use to study) members of the encampment would physically deny him
11 entry. And he rightly feared that they would threaten him with violence
12 for even attempting to enter. If those threats did not dissuade him,
13 Weinberg knew that members of the encampment were willing to engage
14 in violence towards Jews, including Jewish students, who came nearby or
15 attempted to bypass their “checkpoints” and “human phalanxes.” Based on
16 the reasonable fear that the same thing would happen to him, Weinberg
17 stayed away from the entire area while the encampment was “occupying”
18 it.

19 35. Weinberg was also forced to take a different route around Royce
20 Quad on his way to other parts of campus. Prior to Defendants’
21 establishment of their antisemitic encampment, Weinberg often would
22 walk through the Quad. But after Defendants erected the encampment in
23 the middle of the Quad, Weinberg felt obliged to avoid that area out of
24 concern for his safety. And he in fact specifically avoided the “occupied”
25 parts of Royce Quad for the duration of the encampment. In other words,
26 Weinberg was denied access to the Quad because he is a Jew.

27 36. Weinberg was shocked, appalled, and frustrated that he was
28 excluded from a public space at his own university simply because he is a

1 Jew. No institution of higher learning (or any other institution) would
2 tolerate such blatant racial exclusion targeted at any other group.
3 Likewise, it would ordinarily be clear to all that perpetrating such
4 exclusion denies members of the targeted group their civil rights.
5 Weinberg is frustrated that Defendants' conspiracy rendered Jewish
6 students at UCLA second-class citizens—forced to avoid pockets of
7 “occupied” territory and to always be on the lookout for the next
8 encampment, the next checkpoint, or the next chant of “beat that f—king
9 Jew!”

10 37. Plaintiff Dovid Gurevich is the Rabbi of Chabad House at
11 UCLA. Rabbi Gurevich is a Jew.

12 38. When Defendants attempted to reestablish an encampment
13 near the UCLA law school on June 10, Rabbi Gurevich came out to support
14 Jewish students and make a record of what was happening. Defendants
15 greeted Rabbi Gurevich with threats of violence and assault. *See Bandler,*
16 *UCLA Chabad Rabbi Assaulted by Pro-Palestinian Protesters.* A member
17 of Defendants' “security team” slapped Rabbi Gurevich's phone out of his
18 hand. *Id.* Rabbi Gurevich's screen protector was damaged, and if not for
19 the protector, his phone would have been damaged too. Soon after, the
20 situation escalated to death threats when a member of the group told
21 Rabbi Gurevich that he would beat him unconscious and another
22 explained that, if the individual showed the Rabbi his face, he would “have
23 to f—king kill you.” *Id.* These actions were plainly intended to prevent
24 Rabbi Gurevich, by force and threat of force, from exercising his right to
25 be present in a public space on campus as a member of UCLA's Jewish
26 community.

27 39. Rabbi Gurevich was shocked, appalled, and frustrated that he
28 had been threatened with violence and attacked simply because he is a

1 Jew who exercised his right to express support for UCLA’s Jewish
2 students.

3 40. Plaintiff Eli Tsives is an undergraduate student at UCLA.
4 Tsives is a Jew.

5 41. Tsives attended every day of Defendants’ April 25-to-May 2
6 encampment, during which time he observed the encampment
7 substantially expand in size and sophistication. For example, as early as
8 Sunday, April 28, Tsives noticed that Defendants had erected large
9 wooden barricades around the perimeter of the encampment. And as
10 Defendants pushed out the encampment’s borders day-by-day, Tsives
11 observed members of the encampment’s “security teams” becoming more
12 and more aggressive in their efforts to deny Jews access to the area. Tsives
13 also observed that the encampment had a well-organized supply system
14 supported by outside actors, who would drop off supplies at designated
15 points for Defendants to collect and distribute.

16 42. Each day at the encampment, Tsives dressed in a manner that
17 made clear that he was Jewish, including wearing a visible Star of David
18 necklace. Thus, whenever Tsives attempted to pass through one of the
19 “checkpoints” surrounding the encampment, he was either physically
20 rebuffed by uniformed members of the encampment’s “security teams” at
21 point of entry or surrounded and forced out of the area by a “human
22 phalanx” shortly after. For example, on Monday, April 29, Tsives
23 attempted to pass through the checkpoints and was denied entry after the
24 “security team” saw his Star of David necklace.

25 43. By the final few days of the encampment, Tsives was forced to
26 take a different, slower route to his regular class in Kaplan Hall because
27 the encampment and its enforcers had “occupied” the entrance he
28 ordinarily used to enter the building. This caused Tsives to be late to class

1 several times before the encampment was cleared. Tsives was shocked,
2 appalled, and frustrated that he had been excluded from public spaces at
3 his own university (including Dickson Plaza/Royce Quad and his usual
4 route to class) simply because he is a Jew.

5 **Defendants**

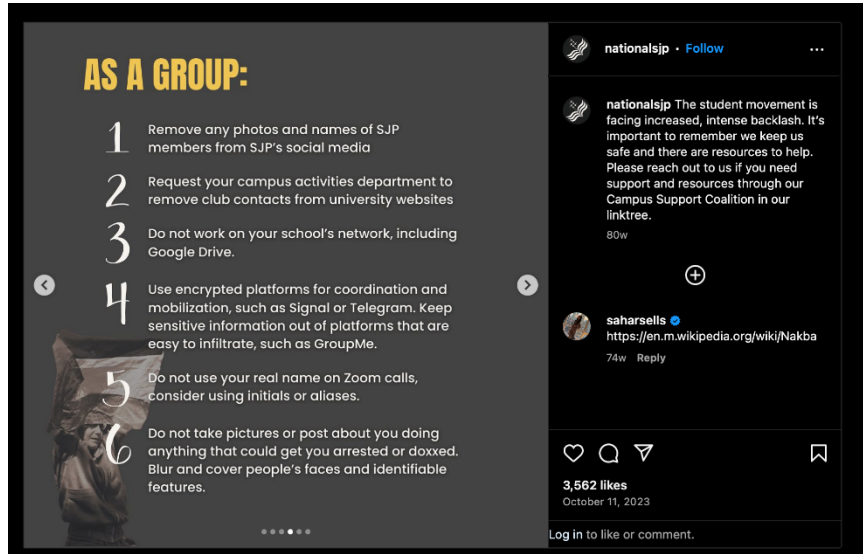
6 44. Defendant National Students for Justice in Palestine is a
7 nationwide membership association that aims to “develop a connected,
8 disciplined movement” to “take colleges and universities across North
9 America by storm.” It is often referred to as National SJP or simply SJP.
10 SJP has built an “ideologically, politically, and organizationally unified”
11 network of over 350 campus “solidarity organizations,” including a (now
12 largely indefinitely suspended) UCLA chapter. That chapter was the
13 primary organizer for the UCLA encampment at Dickson Plaza/Royce
14 Quad. Together with its UCLA chapter, SJP was concededly responsible
15 for coordinating between SJP elements and other Defendants to plan,
16 construct, supply, promote, recruit for, and “defend” the encampment. For
17 example, members of the UCLA chapter organized a call with Defendant
18 Faculty for Justice in Palestine Network (FJP) to request that FJP
19 members sign up for shifts to “support” the encampment. The UCLA
20 chapter was also the encampment’s public face, with several of its
21 members serving as designated “spokespersons,” (i.e., the only members of
22 the encampment permitted to speak to the press).

23 45. Defendant John Doe #1 was a student at UCLA in 2024, where
24 he served as President of the UCLA chapter. Because SJP instructs its
25 members to engage in tactics designed to prevent the identification of high-
26 ranking chapter officials, Doe cannot yet be identified:

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10 46. On information and belief, as President, and in collaboration
11 with other Defendants, Doe #1 directed SJP's planning and execution of
12 the UCLA encampment at Dickson Plaza and Royce Quad, as well as SJP's
13 subsequent efforts to reestablish the encampment and "occupy" other
14 university facilities like Moore Hall and UCLA Law School.

15 47. On information and belief, Doe's responsibilities included
16 securing funding and planning materials from National SJP (and thus
17 from its fiscal sponsor, Defendant Westchester People's Action Coalition
18 (WESPAC)), approving the ultimate decision to move forward with the
19 encampment, and executing the initial construction project on April 25.
20 Doe also coordinated with other Defendants to promote the encampment
21 on social media with the goal of recruiting additional personnel to "defend"
22 against law enforcement and other perceived enemies.

23 48. These recruitment efforts were especially effective at bringing
24 nonstudents to the encampment to support it and grow its ranks. Both
25 organizers and participants told friendly press outlets that an influx of
26 protesters who were not students came to support the encampment shortly
27 before it was dissolved, resulting in the encampment growing three times
28 as large from the day prior.

1 49. On information and belief, Doe engaged in similar coordination
2 and direction regarding SJP's subsequent efforts to reestablish
3 encampments elsewhere on campus, including the failed takeovers of
4 Moore Hall and UCLA Law School.

5 50. Defendant AJP Educational Foundation, Inc. (d/b/a American
6 Muslims for Palestine) is a California nonprofit that provides financial
7 support and organizational capacity to groups like SJP. AJP/AMP is under
8 investigation for potential terrorist fundraising. *See Attorney General's*
9 *Office Opens Investigation into American Muslims for Palestine Nonprofit,*
10 *Off. of the Va. Att'y Gen. (Oct. 31, 2023), perma.cc/H9FJ-7CNH; NJSP:*
11 *Antisemitism, Anti-Americanism, Violent Extremism, and the Threat to*
12 *North American Universities, The Inst. for the Study of Global*
13 *Antisemitism & Pol'y 43-44 (2024), perma.cc/NQ5J-LH9E.*

14 51. That is unsurprising, given that AJP/AMP "frequently engages
15 in rhetoric that promotes antisemitic tropes and support for violence
16 against Israel, such as praising Hamas for the October 7, 2023, attack."
17 *American Muslims for Palestine (AMP), Anti-Defamation League,*
18 *perma.cc/6S2M-JPBT (archived Mar. 18, 2025).* The same is true for many
19 of the organizations AJP/AMP supports. *See id.* AMP works in broad-based
20 coalitions and supports campus activism through SJP and Muslim Student
21 Associations.

22 52. Defendant Osama Aburshaid is AMP's Executive Director. On
23 information and belief, in that capacity, Aburshaid exercised control over
24 AMP's ultimate decision to conspire with SJP and other Defendants to
25 plan, construct, supply, promote, and recruit for the UCLA encampment.

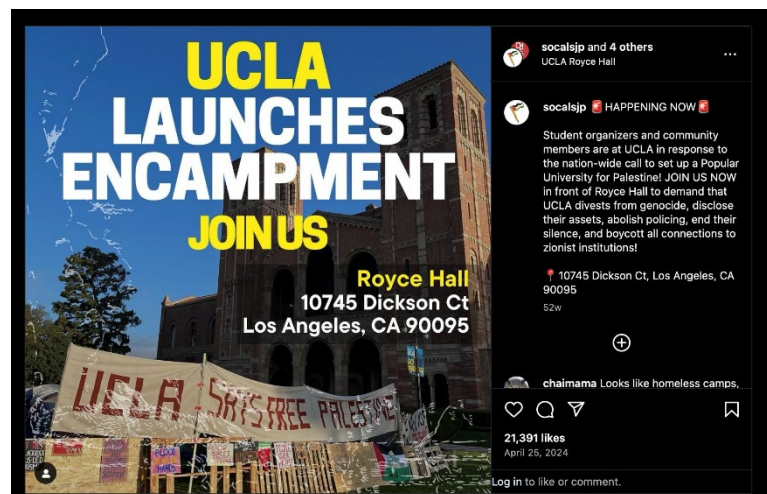
26 53. Defendant Hatem Al-Bazian is Chairman of AMP's Board of
27 Directors. On information and belief, in that capacity, Al-Bazian exercised
28 control over AMP's ultimate decision to conspire with SJP and other

1 Defendants to plan, construct, supply, promote, and recruit for the UCLA
2 encampment.

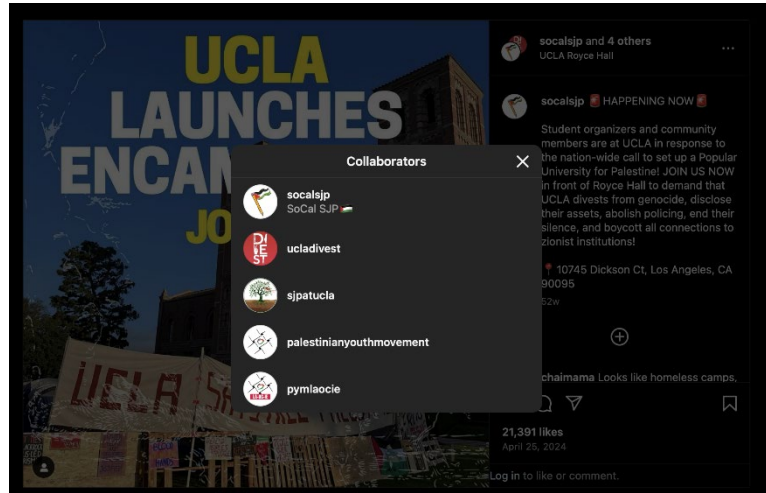
3 54. Defendant Faculty for Justice in Palestine Network is a
4 nationwide membership association comprised of chapters at various
5 universities, including UCLA. FJP supports and amplifies SJP's efforts on
6 college campuses around the country to make public spaces unsafe for
7 Jews. FJP encourages its members to "support and join" SJP's efforts on
8 campus and claims that members have "played a frontline role, physically
9 and materially," in supporting SJP's endeavors, including the campus
10 encampment initiative.

11 55. Defendant UC Divest Coalition is a California-based
12 unincorporated association made up of individuals and entities that seek
13 to pressure the UC system into divesting from, among other things, the
14 State of Israel. As of June 2023, the Coalition's membership included,
15 among other entities, five California-based SJP chapters (including the
16 now largely indefinitely suspended UCLA chapter) and the Palestinian
17 Youth Movement.

18 56. On April 25, 2024, the Coalition conspired with SJP and other
19 member organizations to construct a fortified camp near Dickson Plaza
20 and Royce Quad that would become the core of the UCLA encampment:



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57. Defendant WESPAC Foundation is a New York nonprofit organization that acts as “fiscal sponsor” for SJP, PYM, and similar organizations, which means that WESPAC receives and administers donations on behalf of such organizations for use on “projects in the United States.” See Hobbs et al., *Activist Groups Trained Students for Months Before Campus Protests*, Wall St. Journal (May 3, 2024), bit.ly/4lO5wUs; WESPAC, Anti-Defamation League, perma.cc/TK7M-LFRL (archived Mar. 18, 2025).

58. Defendant People’s City Council is a Los Angeles-based unincorporated association that describes itself as an “abolitionist, anti-capitalist, and anti-imperialist collective.” People’s City Council made extensive use of social media to promote and recruit for the UCLA encampment. It also issued a list of “urgent” “supply needs” geared towards equipping the encampment’s security teams, with requests that included shields, airsoft goggles, gas masks, helmets, wood for barricades, and umbrellas.

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LEGAL BACKGROUND

59. Section 1985(3) provides that “[i]f two or more persons in any State or Territory conspire ... for the purpose of depriving, either directly or indirectly, any person or class of persons of the equal protection of the laws, or of equal privileges and immunities under the laws; or for the purpose of preventing or hindering the constituted authorities of any State or Territory from giving or securing to all persons within such State or Territory the equal protection of the laws” then “if one or more persons engaged therein do, or cause to be done, any act in furtherance of the object of such conspiracy, whereby another is injured in his person or property, or deprived of having and exercising any right or privilege of a citizen of the United States, the party so injured or deprived may have an action for the recovery of damages occasioned by such injury or deprivation, against any one or more of the conspirators.” 42 U.S.C. §1985(3).

60. Though this language is sometimes referred to collectively as the “equal protection clause,” it is in fact made up of two separate clauses—the “deprivation clause” and the “hindrance clause.” “There is a significant distinction between the clauses.” *Nat’l Abortions Fed’n v. Operation*

1 *Rescue*, 8 F.3d 680, 685 (9th Cir. 1993). “The deprivation clause concerns
2 conspiracies of some private persons to commit tortious actions against
3 other private persons.” *Id.* “The hindrance clause, on the other hand,
4 concerns conspiracies to thwart state law enforcement from protecting
5 against such tortious activity.” *Id.*

6 61. To allege a violation of the deprivation clause, a person must
7 show “(1) that some racial, or perhaps otherwise class-based, invidiously
8 discriminatory animus lay behind the conspirators’ action, and (2) that the
9 conspiracy aimed at interfering with rights that are protected against
10 private, as well as official, encroachment.” *Bray v. Alexandria Women’s*
11 *Health Clinic*, 506 U.S. 263, 267-68 (1993) (cleaned up).

12 62. The Supreme Court has recognized that the Thirteenth
13 Amendment protects rights guaranteed against private encroachment,
14 *Bray*, 506 U.S. at 278, and courts around the country have recognized that
15 the Thirteenth Amendment protects both “an underlying right to be free
16 from racial violence,” *Sines v. Kessler*, 324 F. Supp. 3d 765, 781-82 (W.D.
17 Va. 2018); *see also Vietnamese Fishermen’s Ass’n v. Knights of Klu Klux*
18 *Klan*, 518 F. Supp. 993, 1016 (S.D. Tex. 1981), and “the right to enjoy a
19 public accommodation” free from “racially motivated deprivation,” *Sealed*
20 *Plaintiff 1 v. Front*, 2024 WL 1395477, at *24 (E.D. Va. Mar. 31); *Fisher v.*
21 *Shamburg*, 624 F.2d 156, 162 (10th Cir. 1980) (“[W]e hold that a racially
22 motivated conspiracy to interfere with one's enjoyment of a place of public
23 accommodation constitutes a badge of slavery which is a deprivation of
24 equal privileges and immunities under [§1985(3)].”); *Lowden v. William M.*
25 *Mercer, Inc.*, 903 F. Supp. 212, 220-21 (D. Mass. 1995) (similar).

26 63. Hindrance clause claims require a different conspiratorial
27 object (hindering state officials’ efforts to protect the civil rights of a
28

1 protected class) and can be based on rights that are only protected against
2 state interference. *Operation Rescue*, 8 F.3d at 684-86.

3 64. More generally, a §1985(3) claim under either clause requires
4 “(1) a conspiracy; (2) for the purpose of depriving, either directly or
5 indirectly, any person or class of persons of the equal protection of the
6 laws, or of equal privileges and immunities under the laws; and (3) an act
7 in furtherance of the conspiracy; (4) whereby a person is either injured in
8 his person or property or deprived of any right or privilege of a citizen of
9 the United States.” *United Brotherhood of Carpenters and Joiners of Am.,
10 Local 610, AFL-CIO v. Scott*, 463 U.S. 825, 828-29 (1983).

11 65. Jews are a protected class for purposes of §1985(3). *See St.
12 Francis College v. Al-Khazraji*, 481 U.S. 604 (1987) (adopting expansive
13 interpretation of race in 42 U.S.C. §1981 to permit claims based on the
14 plaintiff’s status as an Arab); *Shaare Tefila Congregation v. Cobb*, 481 U.S.
15 615, 617-18 (1987) (holding that Jews can bring claims under 42 U.S.C.
16 §1982).

17 FACTUAL BACKGROUND

18 **A. The web of organizations coordinating and funding 19 antisemitism across the country.**

20 66. Defendants coordinated, funded, planned, promoted, and
21 otherwise fueled the fires of a campaign of antisemitism and racial
22 exclusion centered on the area around Dickson Plaza/Royce Quad
23 “occupied” by the UCLA encampment.

24 67. Sadly, the “student intifada” at UCLA and the resulting denial
25 of civil rights to Jews was nothing new for Defendants. Several Defendants
26 who were critical to the effort to establish the UCLA encampment have a
27 common origin, including links to the terrorist organization Hamas, and
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1 have spent years spreading pro-Hamas and antisemitic propaganda in the
2 United States to the detriment of American Jews.

3 68. Hamas is a deeply antisemitic movement, and it understands
4 its *jihad* against Israel in antisemitic terms. Hamas's founding charter
5 emphasizes that its "struggle against the Jews is very great and very
6 serious."¹ Indeed, that struggle is existential: "The Day of Judgement will
7 not come about until Moslems fight the Jews (killing the Jews), when the
8 Jew will hide behind stones and trees. The stones and trees will say O
9 Moslems, O Abdulla, there is a Jew behind me, come and kill him. Only
10 the Gharkad tree, ([evidently a certain kind of tree understood to be
11 affiliated with the Jewish people]) would not do that because it is one of
12 the trees of the Jews."²

13 69. The Hamas Charter also refers to the organization as "one of
14 the wings of Moslem Brotherhood in Palestine."³ The Moslem Brotherhood
15 (also known as the Muslim Brotherhood) is a Sunni Islamist movement
16 founded in Egypt nearly a century ago, with a long history of
17 antisemitism.⁴

18 70. In 1988, the Muslim Brotherhood established the "Palestine
19 Committee" as a terrorist funding enterprise for Hamas in the United
20 States.⁵ The Palestine Committee was a small network of organizations
21 controlled by activists with no regard or care for corporate form or legal
22 requirements.

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25 ¹ The Avalon Project, *The Covenant of the Islamic Resistance Movement*, Yale L. Sch., perma.cc/7ZD2-RKBL (Aug. 18, 1988).

26 ² *Id.*

27 ³ *Id.*

28 ⁴ See Qutb, *Our Struggle with the Jews* (circa 1950) (written by Sayyid Qutb, a radical Islamist and leading member of the Muslim Brotherhood).

⁵ Vidino, *The Hamas Networks in America: A Short History*, Geo Wash. Program on Extremism 5, 7–8 (Oct. 2023), perma.cc/P2Q3-U87L.

1 71. The Palestine Committee was made up of several constituent
2 organizations. The most relevant here are the Holy Land Foundation for
3 Relief and Development (“HLF”), the Islamic Association for Palestine
4 (“IAP”), and IAP’s many alter egos, including the American Muslim
5 Society (“AMS”). HLF served as Hamas’s fundraising arm in the United
6 States. IAP’s “primary function was to serve as the public voice of Hamas
7 in the United States.”⁶ And although AMS was originally incorporated as
8 a separate organization, it later merged with IAP and operated as one of
9 its many alter egos.⁷

10 72. Both HLF and IAP were founded and controlled by members of
11 Hamas’s senior leadership. For example, Khaled Meshaal, the former head
12 of Hamas’s Political Bureau until 2017 and current leader of Hamas’s
13 diaspora office,⁸ founded IAP. And Mousa Abu Marzook, a “Specially
14 Designated Global Terrorist,” helped to finance the organization.”⁹
15 Meshaal described IAP as one of the “first pillars” of Hamas’s terrorist
16 superstructure.¹⁰

17 73. Hamas did not simply create HLF and IAP and then leave them
18 to their own devices. Instead, both organizations actively fundraised for
19 Hamas and collaborated on public relations strategies to promote Hamas’s
20 efforts. HLF, IAP, and their affiliate organizations were ultimately
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22 ⁶ Levitt, *Hamas: Politics, Charity, And Terrorism in The Service of Jihad* 151 (2006).

23 ⁷ See, e.g., *Boim v. Am. Muslims for Palestine*, 9 F.4th 545, 548 (7th Cir. 2021) (recognizing that IAP “also went by the name ‘American Muslim Society’”).

24 ⁸ See *Justice Department Announces Terrorism Charges Against Senior Leaders of Hamas*, Dep’t of Just. (Sept. 3, 2024), perma.cc/T95R-D573 (explaining that Meshaal is “effectively responsible for Hamas’ official presence outside of the Gaza Strip and the West Bank”).

25 ⁹ Office of Foreign Asset Control Sanctions List Search: Mousa Abu Marzook a/k/a Abu Omar, Abu Umae, Abu Rizq, perma.cc/5ABZ-UGP2.

26 ¹⁰ See Garry M. Servold, *The Muslim Brotherhood and Islamic Radicalism*, in *Know Thy Enemy: Profiles of Adversary Leaders and Their Strategic Cultures* 61–62, bit.ly/4lsUeoK (Barry R. Schneider & Jerrold M. Post eds., 2003).

1 discovered: their complicity in Hamas’s terror regime was exposed, and
2 they (and related individuals) were found criminally and civilly liable for
3 their actions.¹¹

4 74. In 2001, the United States Office of Foreign Asset Control
5 designated HLF as a “Specially Designated Global Terrorist.”¹² A few
6 years later, HLF and five of its leaders were convicted of providing
7 material support to Hamas, with the individuals sentenced to prison.¹³

8 75. In December 2004, after IAP and AMS were found civilly liable
9 for providing material support to Hamas through their propaganda efforts,
10 IAP (and AMS as its alter ego) dissolved.¹⁴ IAP had fundraised on behalf
11 of HLF—evidence presented at the HLF trial revealed that “numerous
12 donation checks ... made payable to ... IAP” were “deposited into HLF’s
13 bank account,” in certain instances with the memo line, “for Palestinian
14 Mujahidden [martyrs] only.”¹⁵

15 76. This pattern consistently recurred. For example, the
16 KindHearts for Charitable Humanitarian Development, Inc., an
17 organization founded by Hamas and the Muslim Brotherhood, was also
18 disbanded following a settlement agreement with the U.S. Treasury
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21 ¹¹ See *United States v. Holy Land Found.*, No. 3:04-cr-240-G (N.D.
22 Tex. 2008); *Federal Jury in Dallas Convicts Holy Land Foundation and its*
23 *Leaders for Providing Material Support to Hamas Terrorist Organization*,
Dep’t of Just. (Nov. 24, 2008), perma.cc/KZD4-B5ZU; Judgment, *Boim v.*
Quranic Literary Inst., No. 1:00-cv-02905, Dkt. 668 (N.D. Ill. Dec. 8, 2004).

24 ¹² Office of Foreign Asset Control Sanctions List Search: Holy Land
Foundation for Relief and Development, perma.cc/5BWY-4YKE.

25 ¹³ See *Federal Judge Hands Down Sentences in Holy Land*
Foundation Case, Dep’t of Justice (May 27, 2009), perma.cc/B6L4-HV6V.

26 ¹⁴ See *Boim v. Holy Land Found. for Relief & Dev.*, 549 F.3d 685, 701
(7th Cir. 2008).

27 ¹⁵ Schanzer, *From Ivory Towers to Dark Corners: Investigating the*
Nexus between Antisemitism, Tax-Exempt Universities, and Terror
28 *Financing*, Hearing before the House Comm. on Ways and Means, 118
Cong. (Nov. 15, 2023), at 8, perma.cc/6PZM-8TWY (“Schanzer 2023
Congressional Testimony”).

1 Department that ended six years of litigation over whether the entity was
2 an arm of Hamas.

3 77. Shortly after Hamas’s original material support apparatus—
4 including IAP, HLF, and KindHearts—was exposed and many of its
5 organizations were shut down, its architects worked to resurrect the
6 enterprise in a manner better suited to avoiding accountability for
7 Hamas’s actions. In 2006, several of the original enterprise’s key members
8 founded AMP to fill the gap left by the loss of IAP and to restore Hamas’s
9 access to an effective propaganda arm in the United States.

10 78. There is “significant overlap between AMP and people who
11 worked for or on behalf of organizations that were designated, dissolved, or
12 held civilly liable by federal authorities for supporting Hamas.”¹⁶ Indeed,
13 six members of AMP’s core leadership team were IAP board members or
14 active in HLF and/or IAP, two are family members of IAP board members,
15 and one was a frequent collaborator and fundraiser for IAP and
16 KindHearts.¹⁷ Many of its staff are similarly holdovers from that
17 enterprise.

18 79. AMP is a collection of individuals who have, for decades,
19 dedicated their lives to promoting the interests of antisemitic international
20 terrorist organizations and nation-state proxies in the United States.
21 While these individuals have adopted AMP as their new corporate form,
22 they retain the same mission they always have: to promote Hamas’s
23 antisemitic platform in the United States.

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26 ¹⁶ Schanzer, *Israel Imperiled: Threats to the Jewish State*, Joint
27 Hearing before the House Foreign Affairs Comm., Subcomm. on
28 Terrorism, Nonproliferation, and Trade & the Subcomm. on the Middle
East and North Africa, 114 Cong. (Apr. 19, 2016), perma.cc/Q54G-PALR
(Schanzer 2016 Congressional Testimony).

¹⁷ See generally Schanzer 2023 Congressional Testimony; Schanzer
2016 Congressional Testimony at 8; see also *Boim* FAC ¶ 78.

1 80. Defendant Hatem Bazian, a founder of AMP and the Current
2 Chairman of the AMP National Board, was a speaker and fundraiser for
3 the Palestine Committee.

4 81. Defendant Osama Abuirshaid, the former Chief Spokesperson,
5 Current Executive Director, and Member of AMP's National Board, is also
6 a former Board Member of IAP/AMS.

7 82. Abuirshaid specializes in creating and publishing propaganda
8 for Hamas and its allies. He has interviewed Hamas leadership¹⁸ and been
9 featured on the website of al-Qassam Brigades, the self-declared military
10 wing of Hamas.

11 83. Abuirshaid also regularly travels to Turkey, where he meets
12 with Sami Al-Arian, who was convicted in the United States in 2006 for
13 providing material support to Palestinian Islamic Jihad, another terrorist
14 group operating in Gaza.¹⁹ In 2021, Abuirshaid spoke at a conference in
15 Jordan titled, "Towards Features of a New Arab Strategy to Deal with the
16 Arab-Israel Conflict," where he sat on a panel with PFLP convicted
17 airplane hijacker Leila Khaled.²⁰ The speaker lineup also included Al-
18 Arian, Sami Khater (a co-founder of Hamas), and Hamas senior official
19 Mohammad Nazzal.²¹

20 84. Abuirshaid publicly supports Hamas and the Muslim
21 Brotherhood and often promotes Hamas and its affiliates' terrorist goals
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24 ¹⁸ Osama Abuirshaid, *The Dialectic of Religion and Politics in Hamas's Thought and Practice* (March 22, 2013) (Ph.D. thesis, Loughboro University).

25 ¹⁹ See @JSchanzer, X (formerly Twitter) (May 5, 2024),
26 perma.cc/MAF8-U6C3; Press Release, *Sami Al-Arian Pleads Guilty to Conspiracy to Provide Services to Palestinian Islamic Jihad*, U.S. Dep't of Justice (Apr. 17, 2006), perma.cc/6W83-8Z8G.

27 ²⁰ *Head of Palestinian American lobby group joins conference with terror-group members*, Jewish News Syndicate, bit.ly/3RE991p (Dec. 3, 2021).

28 ²¹ *Id.*

1 in Arab media by castigating Jews and spreading antisemitic conspiracy
2 theories.²²

3 85. Defendant Hatam al-Bazian is AMP's founder and current
4 Chairman of AMP's National Board. He was a member of two Muslim
5 Brotherhood-affiliated organizations, the General Union of Palestine
6 Studies ("GUPS") and Defendant Muslim Students Association ("MSA").
7 Then, as a professor at the University of California at Berkeley, he founded
8 the first chapter of Students for Justice in Palestine ("SJP").²³ Bazian
9 created SJP in the image of GUPS and MSA.²⁴ Bazian also collaborated
10 with IAP and fundraised for KindHearts.²⁵

11 86. Bazian has a long history of promoting antisemitism. He
12 believes that it is "about time we have an intifada in [the United States],"
13 echoing Hamas' rhetoric.²⁶ Denigrating Jews, he has declared that "The
14 'Jewish nation' is the central myth of Zionism. It needs to be dismantled."²⁷
15 In that same vein, Bazian supports convicted terrorists, including (1)
16 Marwan Barghouti, who murdered five Israelis during the Second Intifada
17 and financed the Sbarro Café massacre in which 15 Israelis died and more
18 than 130 were injured, and (2) Rasmia Odeh, who was convicted of placing
19 two bombs at a Jerusalem supermarket in 1969 and killing two people.
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21 _____
²² See, e.g., *id.*

22 ²³ Fischberger, *The Long March of Radicalization*, City Journal,
23 perma.cc/2C9E-2873 (Oct. 16, 2023); Mael, *On Many Campuses, Hate is
Spelled SJP*, The Tower, bit.ly/3YnpzyS (Oct. 2014).

24 ²⁴ See *SJP's Founding—Based in Terror*, Zionist Org. of Am.,
perma.cc/ZW4U-FU3G (archived Mar. 23, 2025).

25 ²⁵ See Schanzer, *Following the Money: Examining Current Terrorist
Financing and the Threat to the Homeland*, Hearing before House
26 Homeland Sec. Comm., Subcomm. on Counterterrorism and Intel., at 13-
14 (May 12, 2016).

27 ²⁶ @ HamasOnCampus, *Radical Hatem Bazian calls for Intifada
(armed uprising) in the USA!!*, YouTube, perma.cc/V4X4-SSLD (Mar. 23,
2015).

28 ²⁷ @Hatembazian, X (formerly Twitter), perma.cc/NBH5-H8NM
(Apr. 19, 2018).

1 87. AMP openly provides propaganda services for Hamas through
2 its campus arm, SJP. Just last November, AMP held its annual conference,
3 which featured a “Youth Program” that included an “SJP Workshop.” The
4 conference also included separate programming specifically for students
5 referred to as the “Campus Activism Track,” designed to increase
6 “solidarity between SJP chapters.”

7 88. AMP is, in all material respects, a reincarnation of IAP and
8 AMS. It continues to operate with the same core personnel, taking
9 ultimate orders and directions from the same FTOs and nation-state
10 proxies, and endeavors to achieve the same goal: supporting Hamas’s war
11 against the Jews by acting as its propaganda and recruiting division in the
12 United States.

13 89. For these Defendants, past is prologue. The virulent (and often
14 violent) strain of antisemitism that they have nurtured, both at UCLA and
15 on other campuses around the country, is neither coincidence nor merely
16 the organic output of deeply misguided activists. Rather, it is the product
17 of a carefully orchestrated campaign by career supporters of Hamas who
18 have dedicated their lives to fomenting hatred of Jews and the Jewish
19 State of Israel.

20 90. Although AMP ostensibly operates as its own organization, it
21 relies on the corporate status of its fiscal sponsor, AJP. AMP founded AJP
22 in 2008. And both organizations have identical leadership structures and
23 share the same principal place of business in Falls Church, Virginia.
24 AMP’s website advertises that it is funded exclusively by domestic
25 donations, but upon information and belief, AMP can do so only because
26 those funds first pass through AJP, a U.S.-based non-profit.

27 91. Indeed, AMP is now regarded as a “doing business as” name for
28 AJP by the Commonwealth of Virginia, which in October 2023 began to

1 investigate “AJP Educational Foundation, Inc., also known as “American
2 Muslims for Palestine” for “potential violations of Virginia’s charitable
3 solicitation laws,” including “benefiting from or providing support to
4 terrorist organizations.”²⁸

5 92. Defendant WESPAC is the New York-based fiscal sponsor of
6 SJP, which means that it receives and administers donations on behalf of
7 SJP and similar organizations. WESPAC keeps a percentage of any
8 donations it receives and then remits the rest to the groups that it fiscally
9 sponsors. This arrangement enables SJP to collect and distribute funds
10 without transparency.

11 93. The financial interactions between WESPAC and the anti-
12 Israel and pro-Hamas clientele it fiscally sponsors are intentionally
13 opaque, and operate to largely shield the flow of funds between sponsoring
14 and sponsored organizations from public view.

15 94. For instance, WESPAC reported \$2.4 million in revenue in
16 2022-2023 but spent nearly \$1.5 million solely on “office expenses,” a
17 category that, according to the IRS, should include only basic costs to keep
18 the physical office operational, such as computers, software, office
19 cleaning, services, and postage.²⁹

20 95. By contrast, WESPAC reported no fundraising expenses in
21 2022, nor did it report a *single* dollar on travel, information technology,
22 legal services, insurance, rent, or mortgage payments. It also did not
23 report a *single* dollar of salary to its board members or executive
24 leadership in 2022. Instead, WESPAC reported the salary of one lone part-

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26 ²⁸ See Attorney General’s Office Opens Investigation into American
Muslims for Palestine Nonprofit, Off. of the Va. Att’y Gen. (Oct. 31, 2023),
perma.cc/H9FJ-7CNH.

27 ²⁹ Simonson, *Is This Suburban New York Charity a Terrorist Front*
28 *Group?*, Wash. Free Beacon, perma.cc/A9U9-PHC7 (May 20, 2024); Form
990, WESPAC Foundation Inc. (2022), perma.cc/2KSE-
6UMC?type=standard.

1 time employee in the entire organization. That individual makes less than
2 \$100,000 and receives neither health care nor retirement benefits.

3 96. As SJP's fiscal sponsor, WESPAC receives tax-exempt
4 donations and grants on behalf of SJP, since SJP itself lacks tax exempt
5 status.

6 97. The IRS stipulates that fiscal sponsors must retain "control and
7 discretion over use of the funds."³⁰ Thus, as the fiscal sponsor of SJP,
8 WESPAC is responsible for how SJP uses the funds it receives from
9 WESPAC, which includes ensuring that the funds are used for charitable
10 purposes. Conduit-like arrangements where a nominal fiscal sponsor
11 simply funnels money without maintaining discretion are prohibited.

12 98. WESPAC's financial reporting demonstrates that it has served
13 as SJP's fiscal sponsor since at least 2016, if not earlier.³¹

14 99. Much of the antisemitic advocacy on college campuses today is
15 controlled by SJP.

16 100. In 2010, AMP sponsored the first SJP National Convention, at
17 which it announced the creation of AMP's new on-campus sub-brand. SJP's
18 role would be to control the management, financing, and messaging of SJP
19 chapters across the country.³² Though some SJP chapters chose to remain
20 unaffiliated on paper, they receive aid and supporting materials from SJP,
21 particularly as it relates to campus messaging.

22 101. SJP has no formal corporate structure of its own but operates
23 as AMP's college campus brand, which WESPAC funds. AMP maintains

24 ³⁰ *National Foundation v. United States*, 13 Cl. Ct. 486 (1987); see
25 also Rev. Rul. 68-489, 1968-2 C.B. 210.

26 ³¹ Stoll, 'Mysterious' Westchester Foundation Collecting the Cash for
27 This Weekend's National Campus BDS Convention, *Algemeiner*,
perma.cc/2HH4-92M7 (Nov. 3, 2016).

28 ³² Small et al., *Antisemitism Violent Extremism & the Threat to North
American Universities: The Contextualization of the National Students for
Justice in Palestine (NSJP)*, Inst. for the Study of Glob. Antisemitism &
Pol'y 12 (Oct. 2019), perma.cc/NML7-M8G6 ("ISGAP 2019").

1 organizational management and control of SJP. To that end, in 2023, SJP
2 established a centralized structure to exert more control over individual
3 chapters.

4 102. SJP, through its leadership and grassroots supporters, has
5 regularly (1) identified itself as a supporter of, and sometimes even a part
6 of, Hamas and its affiliates' movement; (2) disseminated instructions from
7 Hamas and other FTOs; (3) hosted speakers that are (or are affiliated with)
8 Specially Designated Global Terrorists; and (4) provided direct aid to the
9 same.

10 103. AMP's message to college campuses through SJP is
11 unambiguous: violent attacks are a justified response to Zionism as an
12 idea, to Israel as an entity, and to Jews as a people.³³ The purpose of this
13 messaging is to normalize Hamas's terrorism within Western academic
14 institutions like UCLA, and to generate support for Hamas's
15 eliminationist aims for the Jewish People and the State of Israel among
16 college students. Ultimately, AMP seeks an academic environment on
17 American college campuses where Jews are *persona non grata* and
18 violence against them (along with anyone else who respects Israel's right
19 to exist) is not only accepted and justified, but promoted and celebrated.

20 **B. Antisemitism surges across the United States after the brutal**
21 **terrorist attack on Israel on October 7, 2023.**

22 104. Sadly, antisemitism is as old as the Jewish People. It ebbs and
23 flows, but never dies, and sometimes explodes in an inferno of malice. It
24 is, as the late Rabbi Lord Jonathan Sacks explained, a mutating virus.
25 Sacks, *Keynote Speech in the European Parliament: The Mutating Virus:*
26 *Understanding Antisemitism* (Sept. 27, 2016), perma.cc/Q6W4-TWJS.
27 Jews have been hated "because of their religion," "because of their race,"

28

³³ See, e.g., ISGAP 2019, *supra* note 32, at 11-15.

1 and “because of their nation state, the State of Israel.” Antisemitism “takes
2 different forms but it remains the same thing: the view that Jews have no
3 right to exist as free and equal human beings.” *Id.*

4 105. The United States is unique in world history—a country
5 founded on a set of universal values and the tolerance of all faiths and
6 peoples regardless of their race, religion, or national origin. As our first
7 President proclaimed shortly after the Constitution was ratified: “May the
8 Children of the Stock of Abraham who dwell in this land continue to merit
9 and enjoy the good will of the other Inhabitants; while everyone shall sit
10 in safety under his own vine and figtree, and there shall be none to make
11 him afraid.” Washington, *Letter to the Hebrew Congregation in Newport,*
12 *Rhode Island*, Founders Online, Nat’l Archives (Aug. 18, 1790),
13 perma.cc/FRJ8-247Z.

14 106. This commitment to protecting the rights of all to equality
15 before the law, though imperfectly realized, has drawn Jews from
16 throughout the world to the United States. Not that the United States has
17 been immune from the scourge of antisemitism. *See, e.g., SFFA v.*
18 *Harvard*, 600 U.S. 181, 257 (2023) (Thomas, J., concurring) (describing
19 elite colleges’ efforts to exclude Jews). But the United States has done more
20 than any other nation, other than the State of Israel, to protect the rights
21 and dignity of Jews.

22 107. Today, that commitment is under existential threat.

23 108. On October 7, Hamas orchestrated a barbaric terror attack on
24 Israel during a Jewish religious holiday that “resulted in the murder of
25 nearly 1,200 people[,]” “including more than 40 American citizens.”
26 *Antisemitism on College Campuses Exposed* at 1. More than 250 people
27 were also taken hostage, many of whom Hamas has since murdered, some
28 of whom Hamas has committed grievous acts of sexual violence against,

1 and all of whom Hamas has tortured physically and psychologically. *See,*
2 *e.g., What Is Known About Israeli Hostages Taken by Hamas*, Am. Jewish
3 Comm. (Jan. 14, 2025), perma.cc/U4S9-QT4W; Gettleman, et al., ‘*Screams*
4 *Without Words: How Hamas Weaponized Sexual Violence on Oct. 7*, N.Y.
5 Times (Mar. 25, 2024), bit.ly/4jPchn5.

6 109. October 7 marked the beginning of a new worldwide campaign
7 of Jew hatred and perhaps the worst wave of antisemitism in American
8 history. *See Antisemitism on College Campuses Exposed* at 1, 5; *ADL*
9 *Records Dramatic Increase in U.S. Antisemitic Incidents Following Oct. 7*
10 *Hamas Massacre*, Anti-Defamation League (Oct. 24, 2023),
11 perma.cc/FX5Y-HL52.

12 110. Jews have been denied entry to public facilities, threatened
13 with eliminationist rhetoric, and even barricaded inside a school library
14 while a would-be pogrom banged on locked doors and shouted antisemitic
15 chants. *See, e.g., Donlevy, & Vago, Cooper Union Barricades Jewish*
16 *Students Inside Library as Pro-Palestinian Protesters Bang on Doors*, N.Y.
17 Post (Oct. 25, 2023), perma.cc/62GF-ERB7; *Gartenberg v. Cooper Union for*
18 *the Advancement of Sci. & Art*, No. 24 CIV. 2669 (JPC), 2025 WL 401109,
19 at *16 (S.D.N.Y. Feb. 5) (denying Cooper Union’s motion to dismiss in
20 relevant part, and expressing “disma[y]” at “Cooper Union’s suggestion
21 that the Jewish students should have hidden upstairs or left the
22 building”).

23 111. The worst of this wave of hatred has been focused on university
24 campuses. *See generally Antisemitism and Anti-Israeli Bias at UCLA;*
25 *Antisemitism on College Campuses Exposed*. Jewish students and
26 community members around the country have faced a disproportionate
27 increase in campus hostility, often linked to openly antisemitic
28 encampments.

1 **C. The climate of antisemitism and intimidation at UCLA**
2 **in Spring 2024.**

3 112. Since October 7, and especially since antisemitic protestors
4 occupied Dickson Plaza and Royce Quad, UCLA has been a haven for Jew-
5 hatred.

6 113. Two days after the massacre, “an official statement issued by
7 the Undergraduate Student Association Council (USAC) Cultural Affairs
8 Commissioner” praised Hamas, stating that the Commissioner “honor[ed]
9 the Palestinians on the frontlines taking their land and sovereignty back!
10 From the River to The Sea.” *Antisemitism and Anti-Israeli Bias at UCLA*
11 at 47 & n.66.

12 114. A month later, protestors on UCLA’s campus screamed “beat
13 that f****ing Jew” during an anti-Israel parade as they slammed bats into
14 an effigy of Israeli Prime Minister Benjamin Netanyahu. *See*
15 *@NewYorkPost, UCLA students batter Bibi piñata to chants of ‘beat that*
16 *f–g Jew’*, YouTube (Nov. 10, 2023), perma.cc/Z9Q3-QCBA.

17 115. Anti-Israel marches and rallies at UCLA regularly feature
18 chants of antisemitic “slogans, including ‘Intifada,’ ‘from the river to the
19 sea, Palestine will be free,’ and ‘kill the Jews.’” *Antisemitism and Anti-*
20 *Israeli Bias at UCLA* at 46 & nn.54-56.

21 116. Throughout, protestors have sought to avoid accountability and
22 to paralyze Jewish students with fear by concealing their faces in violation
23 of university rules. *Id.* at 50 & nn.79-81.

24 117. There have also been “multiple reports of graffiti and drawings
25 ... that [are] blatantly antisemitic and anti-Israeli.” *Id.* at 63 (discussing
26 examples of swastikas and a Star of David accompanied by the phrase
27 “step here”).

28

1 118. Campus climate worsened when SJP announced the “Popular
2 University for Gaza,” a “coordinated pressure campaign against university
3 administrations and trustees” linked to a nationwide effort to “establis[h]
4 autonomous zones on several university campuses” (including UCLA).
5 Less than a week after SJP launched the campaign, the UCLA chapter (in
6 collaboration with a coalition of on- and off-campus entities), established a
7 fortified encampment near Dickson Plaza and Royce Quad.

8 119. “Violence was documented at the encampment and the
9 surrounding area as early as April 25, 2024, with some Jews, Israelis, and
10 pro-Israel protestors assaulted.” *Antisemitism and Anti-Israeli Bias at*
11 *UCLA* at 57.

12 120. The antisemitic rhetoric and imagery on campus intensified
13 after Defendants conspired to launch the encampment. For example, a van
14 festooned with Swastikas and other anti-Jewish imagery was parked
15 outside the encampment, blaring antisemitic propaganda from a bullhorn
16 and speaker system.

17 121. All this violence and fearmongering had a point—to support the
18 encampment’s “human phalanxes” and “checkpoints,” which made sure
19 that Jewish students were denied access to public spaces “occupied” by the
20 encampment. *Antisemitism and Anti-Israeli Bias at UCLA* at 53-54, 56.

21 122. An internal report commissioned by UCLA called out the
22 university’s deep dysfunction in (failing to) address these disturbing acts,
23 which violated California law and university policy. *See generally*
24 *Antisemitism and Anti-Israeli Bias at UCLA*. In short, the university’s
25 response was too little and too late. And it failed to materialize at all until
26 the situation had deteriorated to just short of open warfare.

27 123. This Court’s recent ruling that UCLA’s response was so
28 deficient as to violate the Constitution confirms the point. *See generally*

1 *Frankel*, 744 F. Supp. 3d at 1025-27. There, this Court found as a matter
2 of fact that “*Jewish students were excluded from portions of the UCLA*
3 *campus because they refused to denounce their faith.*” *Id.* at 1020. That
4 exclusion, as a practical matter, was premised on the plaintiffs’ reasonable
5 fear that traversing the area occupied by the encampment “carried a risk
6 of violence.” *Id.* at 1022.

**D.7 The individuals and organizations funding and coordinating
8 antisemitism at UCLA.**

9 124. Defendants used electronic communications platforms
10 including Instagram, Twitter, Bluesky, Substack, and Google Docs as part
11 of a coordinated and concerted effort to plan, fund, execute, supply,
12 reinforce, and “defend” the UCLA encampment. These efforts were fueled
13 by antisemitic animus and undertaken with the knowledge that their
14 purpose and effect was to deny Jewish students access to Dickson
15 Plaza/Royce Quad, and the surrounding public buildings, including Royce
16 Hall and Powell Library.

17 125. That Defendants agreed to support the encampment is
18 evidenced by the tightly coordinated mass media campaign, involving
19 almost every Defendant, that called on Defendants’ social-media followers
20 to show up to UCLA’s campus uninvited to “defend” the encampment and
21 the “student intifada.” That this coordination not only continued but
22 increased once the university finally permitted law enforcement to step in
23 proves the point.

24 126. Defendants’ coordination is also evidenced by the speed and
25 efficiency with which the encampment was built, erecting a fortified camp
26 out of the dust using construction materials and barricades less than a
27 week after SJP announced a national pressure campaign focused on
28 “autonomous zones” within university campuses and before university

1 officials could react. First-hand accounts explained that the encampment
2 was “surrounded by barricades” constructed by members drilling through
3 layers of pallets to build makeshift fortifications. This was not the work of
4 an uncoordinated rabble caught up in the heat of the moment, it was a
5 well-planned, coordinated, and executed operation.

6 127. A key element of Defendants’ plan was recruiting manpower
7 and requisitioning supplies from outside the UCLA community to sustain
8 and grow the encampment, thus increasing the pressure on university
9 officials to negotiate and make concessions. Large, organized contingents
10 of “crewed up” non-students arrived later in the encampment’s life in
11 anticipation of violence and many members of the encampment wore
12 Keffiyehs, goggles, helmets, and gloves. The encampment also boasted
13 substantial stores of supplies and an enormous “gear depot.” Again,
14 Defendants turned to a coordinated social media campaign that was
15 clearly part of a broader national strategy targeted at the campus
16 encampment movement writ large.

17 128. Defendants committed overt acts in furtherance of their
18 conspiracy.

19 129. Defendants helped SJP and the UCLA chapter develop a plan
20 to springboard the encampment consistent with the recently launched
21 “Popular University for Gaza” campaign, provided funding to buy supplies
22 for the encampment, and coordinated between on- and off-campus
23 Defendants to implement the plan before university officials could react.

24 130. After the encampment was established, Defendants solicited
25 and received additional donations of money and material to aid the
26 encampment, funneling these contributions back to the UCLA chapter,
27 which distributed them on site.

28

1 131. Defendants engaged in a massive training and recruitment
2 effort to grow the encampment, including a joint social media campaign,
3 agreements to host live speaking events at the encampment that were then
4 advertised to Defendants’ followers, and participating in media hits
5 promoting the encampment.

6 132. Finally, Defendants armed and trained “human phalanxes”
7 and “organized self-defense teams” that were deployed at the “front lines”
8 of the encampment to threaten counter-protesters and unfriendly press,
9 deny access (sometimes violently) to Jewish students, expand and
10 maintain the encampment’s control over nearby buildings, and confront
11 law enforcement when it was finally deployed to restore order. These “front
12 line” troops, often not affiliated with UCLA at all, were recruited from
13 Defendants’ social media followings as part of a concerted campaign to
14 “defend” the “student intifada.”

15 **CLAIMS FOR RELIEF**

16 **Count I**

17 **42 U.S.C. §1985(3)**

18 **Conspiracy to Interfere with Civil Rights**

19 **(Against National Students for Justice in Palestine, John Doe #1,**
20 **President of UCLA SJP, AJP Educational Foundation, Inc., d/b/a**
21 **American Muslims For Palestine, Faculty For Justice In**
22 **Palestine Network, UC Divest Coalition, WESPAC Foundation,**
23 **People’s City Council)**

24 133. Plaintiffs incorporate by reference the allegations set forth in
25 the preceding paragraphs.

26 134. Section 1985 of the Ku Klux Klan Act provides that “[i]f two or
27 more persons in any State or Territory conspire or go in disguise on the
28 highway or on the premises of another, for the purpose of depriving, either

1 directly or indirectly, any person or class of persons of the equal protection
2 of the laws, or of equal privileges and immunities under the laws ... the
3 party so injured or deprived may have an action for the recovery of
4 damages occasioned by such injury or deprivation, against any one or more
5 of the conspirators.” 42 U.S.C. §1985(3).

6 135. Defendants plotted, coordinated, and executed a common plan
7 to deprive Plaintiffs and other Jews at UCLA of their rights. Defendants
8 agreed to conspire among themselves and with other entities and
9 individuals for the purpose of depriving Plaintiffs of their constitutional
10 rights and equal protection of the laws. Defendants conspired among
11 themselves and with other individuals and entities to deprive Plaintiffs of
12 their right to equal access to all parts of UCLA’s campus (and specifically
13 the area around Dickson Plaza/Royce Quad), their right to free exercise of
14 religion, and their right to free speech. Defendants also conspired among
15 themselves and with other individuals to subject Plaintiffs to racial
16 intimidation and violence and to stir up racial hatred at UCLA.

17 136. As Jews, Plaintiffs are members of a suspect class protected by
18 42 U.S.C. §1985(3). *See Shaare Tefila Congregation*, 481 U.S. at 617-18.

19 137. Defendants’ agreement manifested through their substantial
20 coordination in marshalling support for the encampment on social media
21 and other electronic communications platforms. The level of coordination
22 on display suggests, at minimum, that the encampment was the result of
23 a common plan rather than the actions of independent actors.

24 138. Defendants engaged in numerous overt acts in furtherance of
25 this conspiracy, such as:

- 26 a. Planning the initial phase of the encampment using materials
27 and funds received from National SJP (and thus from
28 WESPAC, SJP’s fiscal sponsor).

- 1 b. Obtaining the equipment used to build the initial encampment,
2 including construction materials, wooden pallets, drills, and
3 large amounts of prefabricated tents.
- 4 c. Coordinating between on- and off-campus groups to execute the
5 initial phase of the encampment and to erect a fortified camp
6 on Dickson Plaza/Royce Quad.
- 7 d. Holding scheduled speaking events at the encampment
8 headlined by Defendants' high-ranking officials and then using
9 those events as recruiting pitches on social media.
- 10 e. Using social media to recruit contingents of "crewed up"
11 individuals who were otherwise unaffiliated with UCLA to join
12 and "defend" the encampment against law enforcement and
13 other perceived enemies.
- 14 f. Training "human phalanxes" and "self-defense teams" to man
15 "checkpoints" that (1) denied Jewish students entry into
16 occupied areas and (2) threatened those who opposed the
17 encampment with violence.
- 18 g. Soliciting continued donations to support the encampment,
19 which were funneled to and then distributed by SJP's UCLA
20 chapter.

21 139. Defendants have sought to create an atmosphere of violence
22 and intimidation against Plaintiffs and other Jews, and to violate
23 Plaintiffs' equal rights, including those under Section 1982.

24 140. Defendants, their agents, and their co-conspirators undertook
25 the activities described above as part of an unlawful conspiracy to deprive
26 Jews of their right to the equal protection of the laws and their right to the
27 equal enjoyment of the privileges and immunities of citizens of the United
28 States based on their race.

1 141. These actions and the conspiracy were motivated by
2 discriminatory animus against Jews and specifically against Plaintiffs
3 because they are Jews.

4 142. Plaintiffs have suffered several legal injuries because of
5 Defendants' actions. Each Plaintiff was deprived of one or more of their
6 rights or privileges as a citizen of the United States, including the right to
7 equal protection of the laws, equal privileges thereunder, to use and enjoy
8 Royce Quad, Dickson Plaza, Powell Library, Royce Hall, and Kaplan Hall,
9 places of public accommodation open to the UCLA community, and to do
10 so without fear or intimidation on the basis of race.

11 143. As a result of the conspiracy, Plaintiffs have been harmed.
12 Hoftman was assaulted and robbed by members of the encampment's
13 "security" team. Rabbi Gurevich was assaulted and subjected to death
14 threats in June when the same groups attempted to reestablish an
15 encampment near the UCLA law school. Weinberg was denied access to
16 the "occupied" parts of Royce Quad and forced to change his ordinary
17 routine in April and May out of concern for his safety. And Tsives was
18 denied access to his ordinary route to class in Kaplan Hall because
19 Defendants "occupied" the entrance he ordinarily used, causing him to be
20 late to class. Plaintiffs knew that Jews were not welcome around
21 Defendants' encampment (and attempted encampments), and that this
22 lack of fellow feeling would inevitably result in violence were they to assert
23 their right to exist as Jews in "occupied" territories.

24 144. As a direct and proximate result of Defendants' actions,
25 Plaintiffs have suffered harm in the form of both general and special
26 damages in an amount to be determined at trial, including, but not limited
27 to, compensatory damages, punitive damages, and pre-judgment and post-
28 judgment interest.

1 **Count II**

2 **42 U.S.C. §1986**

3 **Failure to Prevent Conspiracy Against Rights**
4 **(Against Defendants Doe #1, Aburshaid, Al-Bazian)**

5 145. Plaintiffs incorporate by reference the allegations set forth in
6 the preceding paragraphs.

7 146. Section 1986 of the Ku Klux Klan Act provides that “[e]very
8 person who, having knowledge that any of the wrongs conspired to be done,
9 and mentioned in section 1985 ... , are about to be committed, and having
10 power to prevent or aid in preventing the commission of the same, neglects
11 or refuses so to do, if such wrongful act be committed, shall be liable to the
12 party injured, or his legal representatives, for all damages caused by such
13 wrongful act, which such person by reasonable diligence could have
14 prevented.” 42 U.S.C. §1986. Under Section 1986 an individual is not
15 required to have “participated in the conspiracy or shared in the
16 discriminatory animus with members of the conspiracy.” *Park v. City of*
17 *Atlanta*, 120 F.3d 1157, 1160 (11th Cir. 1997). Rather, for liability to attach
18 it is enough that the individual “knew of a § 1985 conspiracy and, having
19 the power to prevent or aid in preventing the implementation of the
20 conspiracy, neglected to do so.” *Id.*

21 147. On information and belief, Defendants knew of the conspiracy
22 to deprive Plaintiffs of their civil rights, in large part because they were
23 high-ranking officials in the organizations that were parties to the
24 conspiracy.

25 148. On information and belief, Defendants had it in their power,
26 acting in their capacities as high-ranking officials in the organizational
27 Defendants, to prevent or aid in preventing the implementation of the
28

1 conspiracy by stopping outright (or at least limiting) their organizations’
2 involvement.

3 149. But rather than take steps to prevent or aid in preventing the
4 conspiracy against Plaintiffs’ civil rights, on information and belief,
5 Defendants neglected to act in violation of Section 1986. That they did so
6 is no surprise. After all, many have been denigrating Israel, working for
7 the benefit of Hamas, and promoting Jew-hatred in the United States for
8 decades. But the fact that a conspiracy against civil rights can be resilient
9 does not make it legal. And the fact that many Defendants have been
10 engaged in a common enterprise to promote the antisemitic hatred of Jews
11 for many years does not absolve them of accountability for the
12 consequences when that advocacy ripens into a violent antisemitic
13 encampment that denies Jews equal access to campus.

14 150. As a result of Defendants’ actions and failure to act, Plaintiffs
15 have been injured. Hoftman was assaulted and robbed by members of the
16 encampment’s “security” team. Rabbi Gurevich was assaulted and
17 subjected to death threats in June when the same groups attempted to
18 reestablish an encampment near the UCLA law school. Weinberg was
19 denied access to the “occupied” parts of Royce Quad and forced to change
20 his ordinary routine in April and May out of concern for his safety. And
21 Tsives was denied access to his ordinary route to class in Kaplan Hall
22 because Defendants “occupied” the entrance he ordinarily used, causing
23 him to be late to class. Plaintiffs knew that Jews were not welcome around
24 Defendants’ encampment (and attempted encampments), and that this
25 lack of fellow feeling would inevitably result in violence were they to assert
26 their right to exist as Jews in “occupied” territories.

27 151. As a direct and proximate result of Defendants’ actions and
28 inactions, Plaintiffs have suffered harm in the form of both general and

1 special damages in an amount to be determined at trial, including, but not
2 limited to, compensatory damages, punitive damages, and prejudgment
3 and post judgment interest.

4 **Count III**

5 **Cal. Civil Code §51.7**

6 **Ralph Civil Rights Act of 1976**

7 **(Against National Students for Justice in Palestine, John Doe #1,**
8 **President of UCLA SJP, AJP Educational Foundation, Inc., d/b/a**
9 **American Muslims For Palestine, Faculty For Justice In**
10 **Palestine Network, UC Divest Coalition, WESPAC Foundation,**
11 **People’s City Council)**

12 152. Plaintiffs incorporate by reference the allegations set forth in
13 the preceding paragraphs.

14 153. The Ralph Civil Rights Act of 1976 provides that “[a]ll persons
15 within the jurisdiction of this state have the right to be free from any
16 violence, or intimidation by threat of violence, committed against their
17 persons or property because of” race or ethnicity. Cal. Civ. Code
18 §51.7(b)(1).

19 154. Defendants have harassed, intimidated, denied access to public
20 places, and assaulted Plaintiffs because they are Jews or attempted,
21 facilitated, or conspired to do the same in violation of the Ralph Civil
22 Rights Act.

23 155. As a result of Defendants’ actions, Plaintiffs have been injured.
24 Hoftman was assaulted and robbed by members of the encampment’s
25 “security” team. Rabbi Gurevich was assaulted and subjected to death
26 threats in June when the same groups attempted to reestablish an
27 encampment near the UCLA law school. Weinberg was denied access to
28 the “occupied” parts of Royce Quad and forced to change his ordinary

1 routine in April and May out of concern for his safety. And Tsives was
2 denied access to his ordinary route to class in Kaplan Hall because
3 Defendants “occupied” the entrance he ordinarily used, causing him to be
4 late to class. Plaintiffs knew that Jews were not welcome around
5 Defendants’ encampments and knew that this lack of fellow feeling would
6 inevitably result in violence were they to assert their right to exist as Jews
7 in “occupied” territories.

8 156. As a direct and proximate result of Defendants’ actions,
9 Plaintiffs have suffered harm in the form of both general and special
10 damages in an amount to be determined at trial, including, but not limited
11 to, compensatory damages, punitive damages, and prejudgment and post
12 judgment interest.

13 **Count IV**

14 **Cal. Civil Code §52.1**

15 **Tom Bane Civil Rights Act**

16 **(Against National Students for Justice in Palestine, John Doe #1,**
17 **President of UCLA SJP, AJP Educational Foundation, Inc., d/b/a**
18 **American Muslims For Palestine, Faculty For Justice In**
19 **Palestine Network, UC Divest Coalition, WESPAC Foundation,**
20 **People’s City Council)**

21 157. Plaintiffs incorporate by reference the allegations set forth in
22 the preceding paragraphs.

23 158. The Tom Bane Civil Rights Act provides a right of action
24 against any “person or persons, whether or not acting under color of law,
25 [who] interferes by threat, intimidation, or coercion, or attempts to
26 interfere by threat, intimidation, or coercion, with the exercise or
27 enjoyment by any individual or individuals of rights secured by the
28

1 Constitution or laws of the United States, or of the rights secured by the
2 Constitution or laws of [California].” Cal. Civil Code §52.1(b).

3 159. Defendants interfered by threat, intimidation, or coercion with
4 Plaintiffs’ exercise or enjoyment of rights secured by the Constitution or
5 laws of the United States. Defendants interfered with Plaintiffs’ right to
6 access public facilities on the campus they call home (whether as students,
7 faculty, or other members of the UCLA community), because of animus
8 towards their race, ethnicity, national origin, ancestry, and religion.

9 160. Defendants interfered by threat, intimidation, or coercion with
10 Plaintiffs’ exercise or enjoyment of rights secured by the Constitution or
11 laws of California.

12 161. As a result of Defendants’ actions, Plaintiffs have been injured.
13 Again, Hoftman was assaulted and robbed by members of the
14 encampment’s “security” team. Rabbi Gurevich was assaulted and
15 subjected to death threats in June when the same groups attempted to
16 reestablish an encampment near the UCLA law school. Weinberg was
17 denied access to the “occupied” parts Royce Quad and forced to change his
18 ordinary routine in April and May out of concern for his safety. And Tsives
19 was denied access to his ordinary route to class in Kaplan Hall because
20 Defendants “occupied” the entrance he ordinarily used, causing him to be
21 late to class. Plaintiffs knew that Jews were not welcome around
22 Defendants’ encampments and knew that this lack of fellow feeling would
23 inevitably result in violence were they to assert their right to exist as Jews
24 in “occupied” territories.

25 162. As a direct and proximate result of Defendants’ actions,
26 Plaintiffs have suffered harm in the form of both general and special
27 damages in an amount to be determined at trial, including, but not limited
28

1 to, compensatory damages, punitive damages, and prejudgment and post
2 judgment interest.

3 **Count V**

4 **California Civil Conspiracy**

5 **(Against National Students for Justice in Palestine, John Doe #1,**
6 **President of UCLA SJP, AJP Educational Foundation, Inc., d/b/a**
7 **American Muslims For Palestine, Faculty For Justice In**
8 **Palestine Network, UC Divest Coalition, WESPAC Foundation,**
9 **People’s City Council)**

10 163. Plaintiffs incorporate by reference the allegations set forth in
11 the preceding paragraphs.

12 164. In California, “[t]he elements of an action for civil conspiracy
13 are the formation and operation of the conspiracy and damage resulting to
14 plaintiff from an act or acts done in furtherance of the common design. ...
15 In such an action the major significance of the conspiracy lies in the fact
16 that it renders each participant in the wrongful act responsible as a joint
17 tortfeasor for all damages ensuing from the wrong, irrespective of whether
18 or not he was a direct actor and regardless of the degree of his activity.”
19 “The sine qua non of a conspiratorial agreement is the knowledge on the
20 part of the alleged conspirators of its unlawful objective and their intent
21 to aid in achieving that objective.” *Kidron v. Movie Acquisition Corp.*, 40
22 Cal. App. 4th 1571, 1581 (1995). Such “knowledge and intent ‘may be
23 inferred from the nature of the acts done, the relation of the parties, the
24 interest of the alleged conspirators, and other circumstances.” *Id.* (quoting
25 *Wyatt v. Union Mortg. Co.*, 24 Cal. 3d 773, 785, 598 P.2d 45, 52 (1979)).

26 165. Each Defendant conspired together and combined with one or
27 more other persons to accomplish, through the concerted action described
28 above, unlawful and tortious acts, including:

- 1 a. Subjecting Plaintiffs to violence, or intimidation by threat of
- 2 violence, committed against their persons based on race in
- 3 violation of the Ralph Civil Rights Act.
- 4 b. Interfering with Plaintiffs rights under the U.S. and California
- 5 Constitutions by threats of intimidation or coercion in violation
- 6 of the Tom Bane Civil Rights Act.
- 7 c. Subjecting Plaintiffs to civil assault and battery under
- 8 California law.

9 166. As a result of the conspiracy, Plaintiffs have been injured.

10 Again, Hoftman was assaulted and robbed by members of the

11 encampment’s “security” team. Rabbi Gurevich was assaulted and

12 subjected to death threats in June when the same groups attempted to

13 reestablish an encampment near the UCLA law school. Weinberg was

14 denied access to the “occupied” parts Royce Quad and forced to change his

15 ordinary routine in April and May out of concern for his safety. And Tsives

16 was denied access to his ordinary route to class in Kaplan Hall because

17 Defendants “occupied” the entrance he ordinarily used, causing him to be

18 late to class. Plaintiffs knew that Jews were not welcome around

19 Defendants’ encampments and knew that this lack of fellow feeling would

20 inevitably result in violence were they to assert their right to exist as Jews

21 in “occupied” territories.

22 167. Each Plaintiff has suffered damages resulting from acts

23 committed in furtherance of the conspiracy for which Defendants are

24 civilly liable for the actions of all individuals who acted in pursuit of the

25 conspiracy.

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27

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1 **PRAYER FOR RELIEF**

2 Wherefore, Plaintiffs respectfully request that the Court:

- 3 A. A declaratory judgment that the actions described herein
4 deprived Plaintiffs of their rights under state and federal law.
5 B. Compensatory and statutory damages in an amount to be
6 determined at trial.
7 C. Punitive damages in an amount to be determined at trial.
8 D. Interest, attorneys' fees, and costs, as allowed by law.
9 E. Such other relief as the Court deems necessary and just.

10
11 DATED: April 25, 2025

BROWN WEGNER LLP

12
13 /s/ William J. Brown, Jr.

14 William J. Brown, Jr.

15 Thomas R. McCarthy*
16 Zachary P. Grouev*
17 Julius Kairey*
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18 Richard A. Rosen *
19 Omer Wiczuk *
THE LOUIS D. BRANDEIS CENTER
FOR HUMAN RIGHTS UNDER LAW

20 * *Application for admission*
21 *pro hac vice forthcoming*

22 *Attorneys for Plaintiffs*
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JURY DEMAND

Plaintiffs request a trial by jury on all issues so triable.

Dated: April 25, 2025.

DATED: April 25, 2025

BROWN WEGNER LLP

/s/ William J. Brown, Jr.

William J. Brown, Jr.

Thomas R. McCarthy*
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** Application for admission
pro hac vice forthcoming*

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