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19
20 **UNITED STATES DISTRICT COURT**
21 **CENTRAL DISTRICT OF CALIFORNIA**

22 YITZCHOK FRANKEL;
23 JOSHUA GHAYOUM; and
24 EDEN SHEMUELIAN,
25
26 Plaintiffs,

27 v.

REGENTS OF THE UNIVERSITY OF
CALIFORNIA; MICHAEL V. DRAKE,
President of the University of California;
GENE D. BLOCK, Chancellor, University
of California, Los Angeles; DARNELL
HUNT, Executive Vice-President and
Provost; MICHAEL BECK, Administrative
Vice Chancellor; MONROE GORDEN, JR.,
Vice Chancellor; and RICK BRAZIEL,
Assistant Vice Chancellor, each in both his
official and personal capacities,

Defendants.

No. 2:24-CV-4702

COMPLAINT

JURY DEMAND

* *pro hac vice* application forthcoming

1 NATURE OF THE ACTION

2 1. The University of California, Los Angeles, once considered
3 among the most prestigious public institutions in the world, has
4 deteriorated into a hotbed of antisemitism. This rampant anti-Jewish
5 environment burst into view on October 8, 2023, the day after Hamas
6 terrorists attacked Israel in a harrowing rampage that saw over one
7 thousand innocent Jews, including infants and the elderly, murdered,
8 raped, and mutilated.

9 2. In the wake of these horrifying events, UCLA should have taken
10 steps to ensure that its Jewish students were safe and protected from
11 harassment and undeterred in obtaining full access to campus facilities.
12 Instead, UCLA officials routinely turned their backs on Jewish students,
13 aiding and abetting a culture that has allowed calls for the annihilation
14 of the Jewish people, Nazi symbolism, and religious slurs to go
15 unchecked.

16 3. Matters turned especially ugly the following spring.

17 4. Starting on April 25, 2024, and continuing until May 2, 2024,
18 UCLA allowed a group of activists to set up barricades in the center of
19 campus and establish an encampment that blocked access to critical
20 educational infrastructure on campus.

21 5. The activists chanted antisemitic threats like “death to the Jews,”
22 “free Palestine from the hand of Jews,” and “from the River to the Sea,
23 Palestine will be free,” proudly trumpeting their hatred of the Jewish
24 people. But their actions went well beyond such chants.

25 6. With the knowledge and acquiescence of UCLA officials, the
26 activists enforced what was effectively a “Jew Exclusion Zone,”
27 segregating Jewish students and preventing them from accessing the
28 heart of campus, including classroom buildings and the main

1 undergraduate library. In many cases, the activists set up barriers and
2 locked arms together, preventing those who refused to disavow Israel
3 from passing through.

4 7. To enter the Jew Exclusion Zone, a person had to make a
5 statement pledging their allegiance to the activists' views and have
6 someone within the encampment "vouch" for the individual's fidelity to
7 the activists' cause. While this may have prevented a pro-Israel
8 Christian from entering the Zone and permitted access for a Jewish
9 person willing to comply with the enforcers' demands, given the
10 centrality of Jerusalem to the Jewish faith, the practical effect was to
11 deny the overwhelming majority of Jews access to the heart of the
12 campus.

13 8. Activists issued wristbands or other forms of identification to those
14 who passed this Orwellian inquisition.

15 9. UCLA's administration knew about the activists' extreme
16 actions, including the exclusion of Jews. But, in a remarkable display of
17 cowardice, appeasement, and illegality, the administration did nothing
18 to stop it.

19 10. UCLA Chancellor Gene Block publicly acknowledged that
20 "students on their way to class have been physically blocked from
21 accessing parts of the campus."

22 11. Yet even as the activists continued to enforce the Jew Exclusion
23 Zone, Defendants not only failed to marshal resources to intervene—
24 they adopted a policy facilitating the Jew Exclusion Zone, ordering,
25 among other things, UCLA campus police to stand down and step aside.

26 12. And not only that, but UCLA also hired security staff and
27 stationed them on the outskirts of the encampment and other restricted
28 areas.

1 13. But rather than instruct this additional staff to assist Jewish
2 students in accessing campus resources, UCLA instead instructed them
3 to discourage unapproved students from attempting to cross through the
4 areas blocked by the activists.

5 14. The security officers, acting as agents of Defendants, informed
6 Jewish persons that, if they wished to access the encampment or other
7 restricted areas, they would first need to obtain the permission of the
8 encampment members.

9 15. All told, the Jew Exclusion Zone existed on campus for a full week,
10 wreaking havoc on the lives of Jewish students who were simply trying
11 to attend classes and study for exams.

12 16. Each of the Plaintiffs was prevented from passing through the
13 Jew Exclusion Zone. Joshua Ghayoum, a sophomore and history major,
14 was repeatedly blocked from passing through the encampment to reach
15 meetings and study sessions. Eden Shemuelian, a second-year law
16 student, was shooed away by a security officer who chastised her and
17 called her “the problem” for attempting to peacefully observe the
18 encampment. And Yitzchok Frankel, a second-year law student, was
19 harassed and blocked from approaching the encampment by antisemitic
20 activists, all with the assistance of UCLA security.

21 17. UCLA boasts of its “open and inclusive environment that
22 nurtures the growth and development of all faculty, students,
23 administration and staff,”¹ and assures students that it does “not
24 tolerate acts of discrimination, harassment or conduct causing harm to
25 individuals on the basis of race, color, ethnicity,” “citizenship,” “national
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27
28 ¹ *Mission & Values*, UCLA, <https://perma.cc/7KUA-8NLV>.

1 origin,” or “religious beliefs.”² UCLA has a number of policies that
2 purport to implement these guarantees.

3 18. But UCLA has failed to provide Jewish students, faculty, and
4 staff with the protection promised by such policies. Jews should not fear
5 for their safety when they walk around any public space, let alone the
6 campus of a prominent American research university.

7 19. Yet here we are. The administration’s cowardly abdication of its
8 duty to ensure unfettered access to UCLA’s educational opportunities
9 and to protect the Jewish community is not only immoral—it is illegal.

10 20. Specifically, it violates numerous federal and state constitutional
11 guarantees, including the Equal Protection Clause, the Free Exercise
12 Clause, and the freedom of speech.

13 21. And it contravenes the basic guarantee of equal access to
14 educational facilities that receive federal funding, as well as numerous
15 other statutory guarantees of equality and fair treatment.

16 22. Plaintiffs need immediate injunctive relief to ensure that neither
17 they nor any other Jew will again suffer from the discrimination they
18 have endured. And because the UCLA administration’s actions amount
19 to sanctioning segregation, their clearly unconstitutional actions entitle
20 Plaintiffs to hold the school’s administrators personally liable for their
21 reprehensible failures.

22 23. In 1790, President George Washington wrote to the Hebrew
23 Congregation of Newport, Rhode Island, which had sought assurances
24 about the place of Jews within American society. He wrote, “May the
25 Children of the stock of Abraham, who dwell in this land, continue to
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27 ² *Inclusive Excellence Framework for Advancing EDI @ UCLA*, UCLA
28 <https://perma.cc/3HMJ-F5K6>.

1 merit and enjoy the good will of the other Inhabitants; while every one
2 shall sit in safety under his own vine and figtree, and there shall be none
3 to make him afraid.”³

4 24. UCLA has grievously failed to live up to Washington’s promise
5 that none shall be made afraid. But this Court can ensure that his
6 promise—and, more importantly, the promises of the United States
7 Constitution and civil rights laws—are kept.

8 JURISDICTION AND VENUE

9 25. The Court has subject-matter jurisdiction under 28 U.S.C.
10 §§ 1331 and 1343 over Plaintiffs’ claims arising under the Constitution
11 and laws of the United States. The Court has supplemental jurisdiction
12 over Plaintiffs’ state law claims because they “form part of the same case
13 or controversy.” 28 U.S.C. § 1367(a).

14 26. The Court has authority to issue the declaratory and injunctive
15 relief sought under 28 U.S.C. §§ 2201 and 2202.

16 27. Defendants’ constitutional violations are actionable under 42
17 U.S.C. § 1983.

18 28. Venue lies in this district under 28 U.S.C. § 1391(b), including
19 because (i) at least one Defendant resides in the Central District of
20 California and all Defendants reside in the State of California, and (ii) a
21 substantial part of the events or omissions giving rise to the claim
22 occurred in the Central District of California.

23 THE PARTIES

24 29. Plaintiff Yitzchok Frankel is Jewish. He is a student at the UCLA
25 School of Law who just completed his second year of law school. Frankel

26 ³ Letter from George Washington to the Hebrew Congregation in
27 Newport, Rhode Island (Aug. 18, 1790), in *Founders Online*, National
28 Archives, <https://perma.cc/VUR8-G3BC>.

1 resides in Los Angeles, California.

2 30. Plaintiff Joshua Ghayoum is Jewish. He just completed his
3 sophomore undergraduate year at UCLA. Ghayoum resides in Los
4 Angeles, California.

5 31. Plaintiff Eden Shemuelian is Jewish. She is a student at the
6 UCLA School of Law who just completed her second year of law school.
7 Shemuelian resides in Los Angeles, California.

8 32. Defendant Regents of the University of California is a public
9 agency within the meaning of Cal. Gov't Code § 7920.525(a) and is
10 empowered under the California Constitution, Article IX, Section 9, to
11 administer the University of California, including the University of
12 California, Los Angeles. The Board of Regents is the governing body for
13 the University of California system and under Article IX, Section 9, of
14 the California Constitution has “full powers of organization and
15 government.” The Board of Regents has its principal place of operation
16 in Oakland, California.

17 33. Defendant Dr. Michael V. Drake is the current President of the
18 University of California and has served in that position since August
19 2020. As President, Drake oversees and is responsible for the operations
20 of the entire University of California system, which includes UCLA.
21 Drake is sued in both his personal capacity and in his official capacity.
22 Drake resides in California.

23 34. Defendant Dr. Gene D. Block is the current Chancellor of UCLA
24 and has served in that position since August 2007. As Chancellor, Block
25 is the highest-ranking university official at UCLA. Block's duties include
26 establishing campus policies, goals, and strategy. He is sued in both his
27 personal capacity and in his official capacity. Block resides in this judicial
28 district.

1 35. Defendant Dr. Darnell Hunt is the current Executive Vice
2 Chancellor and Provost of UCLA and has served in that position since
3 September 2022. He is sued both in his personal capacity and in his
4 official capacity. Hunt resides in this judicial district.

5 36. Defendant Michael J. Beck is the current Administrative Vice
6 Chancellor of UCLA and has served in that position since March 2016.
7 Beck was in charge of the public safety operations of the school at all
8 relevant times from October 7, 2023, through May 5, 2024.⁴ Defendant
9 Beck is sued in both his personal capacity and in his official capacity.
10 Beck resides in this judicial district.

11 37. Defendant Monroe Gorden, Jr., is the current Vice Chancellor,
12 Student Affairs, of UCLA and has served in that position since April
13 2018. Gorden is sued both in his personal capacity and in his official
14 capacity. Gorden resides in this judicial district.

15 38. Defendant Rick Braziel is the Associate Vice Chancellor for
16 Campus Safety at UCLA. In this role, Braziel serves as the head of the
17 newly created Office of Campus Safety at UCLA, which as of May 5, 2024,
18 oversees the UCLA Police Department (“UCLA PD”). Braziel is sued in
19 his personal capacity and his official capacity. Braziel resides in this
20 judicial district.

21 39. All individual Defendants are persons acting under color of state
22 law within the meaning of 42 U.S.C. § 1983.

23 **FACTUAL BACKGROUND**

24 **A. UCLA**

25 40. The University of California, Los Angeles is a large public research
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27 ⁴ Gene D. Block, *Changes to Campus Security Operations*, UCLA
28 Chancellor (May 5, 2024), <https://perma.cc/Y9DV-4A3H>.

1 university located in the Westwood neighborhood of Los Angeles,
2 California, which is within the Central District of California

3 41. UCLA is one of the largest universities in California, with over
4 33,000 undergraduate students and over 13,000 graduate students.

5 42. UCLA is part of the 10-campus University of California system,
6 which includes other universities such as the University of California,
7 Berkeley.

8 43. UCLA's campus is spread across 419 acres of publicly owned land
9 that is, as a general matter, open to the public.

10 44. UCLA's Younes and Soraya Nazarian Center for Israel Studies is
11 the university's center promoting the study of modern Israel and was the
12 first of its kind on the West Coast when it was founded in 2010.

13 45. Approximately eight percent of UCLA's 33,000 undergraduate
14 students are Jewish.

15 46. UCLA tells its students that its policies exist to "create and
16 maintain a safe, supportive, and inclusive campus community that
17 engages students."⁵

18 47. The UCLA administration has repeatedly trumpeted its
19 commitment to inclusion. Indeed, UCLA stated that it "will never remain
20 silent when unlawful actions threaten our students and community
21 members."⁶

22 48. As a public university, UCLA has a policy for public protests that
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25 ⁵ *Student Conduct Code*, UCLA Office of the Dean of Students,
26 <https://perma.cc/G6JD-E9TG>.

27 ⁶ UC President Janet Napolitano and UC Chancellors, *A Letter to the*
28 *UC Community on Today's DACA Decision*, UCLA Chancellor (June 18,
2020), <https://perma.cc/A2ZC-TR4F>.

1 includes time, place, and manner restrictions.⁷

2 49. The policy specifically notes that “speech and assembly on
3 university grounds” “must not interfere with the orderly operation of the
4 campus and must be conducted in a manner that reasonably protects
5 others from becoming involuntary audiences.”

6 50. For instance, it violates the regulations to “block entrances to or
7 otherwise interfere with the free flow of traffic into and out of campus
8 buildings,” “knowingly and willfully interfere with the peaceful conduct
9 of the activities of the campus or any campus facility by intimidating,
10 harassing, or obstructing any University employee, student, or any other
11 person having lawful business with the University,” and to “camp or
12 lodge, except in authorized facilities or locations.”⁸

13 51. UCLA’s policies do not allow private individuals to exercise
14 exclusive control over campus facilities or spaces.

15 52. UCLA also has an anti-discrimination policy, which protects
16 students and faculty from discrimination and harassment.

17 53. The policy includes reporting and investigation mechanisms and
18 promises that “[a]ny individual can report conduct that may be
19 Prohibited Conduct. The University will respond promptly and equitably
20 to such reports. This includes appropriate action to stop, prevent, and
21 remedy the Prohibited Conduct.”⁹

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25 ⁷ *Your First Amendment Rights as a Student at UCLA* at 3, UCLA
Student Affairs, <https://perma.cc/FP2Z-8NWC>.

26 ⁸ *Id.* at 7-8.

27 ⁹ *Anti-Discrimination Policy* at 5, University of California Systemwide
28 Office of Civil Rights (Feb. 20, 2024), <https://bit.ly/3KqZ1pj>.

1 **B. Antisemitic Protests at UCLA Following the October 7th**
2 **Attack**

3 54. In the wake of the deadly Hamas attacks against Israel on October
4 7, 2023, protests emerged around the country, frequently on college
5 campuses.

6 55. These protests often included disturbing antisemitic language and
7 imagery.

8 56. As Chancellor Block has admitted in sworn testimony, UCLA has
9 not been “immune to the disturbing rise of antisemitism across our
10 country since October 7th.”¹⁰

11 57. UCLA was also the site of antisemitic demonstrations.

12 58. For example, at an October 12, 2023, demonstration at Bruin
13 Plaza—a thoroughfare in the heart of UCLA’s undergraduate campus—
14 activists chanted “*Itbah El Yahud*” (“slaughter the Jews” in Arabic) and
15 carried antisemitic signs.

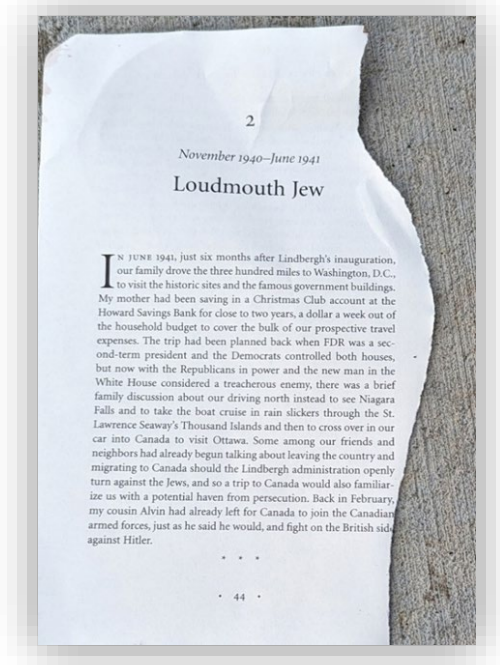
16 59. Counter-protesters present at the time were identifiably Jewish,
17 through cultural or religious clothing and jewelry, or were identifiably
18 pro-Israel, based on holding or wearing insignia of Israeli flags.

19 60. Police officers were present but did not intervene.

20 61. A few weeks later, a UCLA faculty member found a piece of paper
21 entitled “Loudmouth Jew” accompanied by a book cover prominently
22 featuring a swastika on top of a pile of trash placed outside the faculty
23 member’s home.

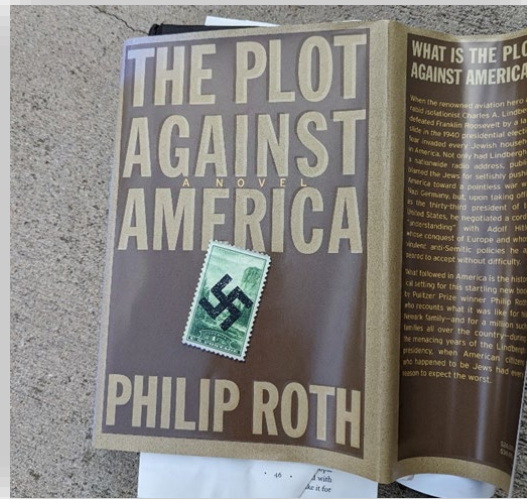
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26 ¹⁰ House Comm. on Educ. & the Workforce, *Calling for Accountability:*
27 *Stopping Antisemitic College Chaos Before the H. Comm. on Educ. & the*
28 *Workforce*, 118th Cong. at 41:10-41:17, YouTube (May 23, 2024),
 <https://bit.ly/3R8V3FD> (statement of Chancellor Block).

1 62. Figure 1 is a picture of the “Loudmouth Jew” paper.



12 13 Figure 1

14 15 63. Figure 2 is a picture of the book cover featuring a swastika.



16 17 18 19 20 21 22 23 24 25 Figure 2

26 64. Chancellor Block issued a letter to the UCLA community on
27 October 27, 2023, in which he acknowledged that the “ongoing conflict in
28

1 the Middle East” had “stirred very deep emotions in many of us.” He
2 stated that these emotional responses do “not in the least give anyone in
3 our community—or anyone visiting our campus—license to make our
4 students, staff or faculty feel unsafe.”¹¹

5 65. But the antisemitic protests at UCLA continued unabated.

6 66. On November 8, 2023, hundreds of agitators swarmed the UCLA
7 School of Law, holding signs and chanting “from the River to the Sea,”
8 “there’s only one solution,” “*intifada*,” “death to Israel,” and “death to
9 Jews.”

10 67. Also on November 8, 2023, at a Students for Justice in Palestine
11 protest, harassers chanted “beat that fucking Jew” through a megaphone
12 while bashing a piñata bearing an image of Israeli Prime Minister
13 Benjamin Netanyahu.¹²

14 68. In response to these threats of violence and displays of anti-Jewish
15 hostility, Chancellor Block sent another communication—an email to the
16 campus community that acknowledged a “rise in reprehensible acts of
17 Antisemitism” both globally and on campus. He described the November
18 8, 2023, outburst as “an event” involving “protected speech under the
19 First Amendment.”¹³

20 69. Yet he was forced to acknowledge that “individuals exhibited
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22 ¹¹ Gene D. Block, *Maintaining a Safe Learning and Working*
23 *Environment for All*, UCLA Chancellor (Oct. 27, 2023),
<https://perma.cc/Q9A9-7F7T>.

24 ¹² Greg Gilman, *UCLA Condemns ‘Hateful Behavior,’ ‘Antisemitic*
25 *Language’ from Pro-Palestinian Student Protesters*, Los Angeles
26 Magazine (Nov. 12, 2023), <https://bit.ly/3WMDWBK>.

27 ¹³ Gene D. Block, *Standing Against Bigotry at the University of*
28 *California*, UCLA Chancellor (Nov. 10, 2023), <https://perma.cc/4SMG-4T6C>.

1 extremely hateful behavior and used despicable Antisemitic language,
2 which was captured on video and shared widely, frightening many within
3 our community.”¹⁴

4 70. Chancellor Block pledged to “work against” such “bigotry” and that
5 his “administration [would] launch[] its own set of efforts to strengthen
6 community and reaffirm our values in this period of intense strife.”¹⁵

7 71. These words proved hollow. In the following months, Jewish
8 students and faculty at UCLA began to raise safety concerns after anti-
9 Israel protests caused numerous incidents affecting Jewish faculty, staff,
10 and students.

11 72. For instance, later in November, the Co-Director of UCLA Chabad,
12 Rabbi Dovid Gurevich, “said he thinks many Jewish students have felt
13 unsafe since the Oct. 7 attack and that his organization has recently
14 increased security measures.”¹⁶

15 73. And a number of Jewish students recounted seeing antisemitic
16 symbols (such as a swastika carved into a tree), hearing anti-Jewish
17 chants, and being subject to harassment because they are Jewish. These
18 instances and others left many Jewish students feeling “honestly scared
19 for” their “life” when walking on campus.¹⁷

20 74. In another incident, of which Chancellor Block was aware, pro-
21

22 ¹⁴ *Id.*

23 ¹⁵ *Id.*

24 ¹⁶ Dylan Winward, *Survivor recounts experience of Oct. 7 attack at event*
25 *hosted by Chabad at UCLA*, Daily Bruin (Nov. 18, 2023),
26 <https://perma.cc/94HX-5YEQ>.

27 ¹⁷ Dylan Winward & Catherine Hamilton, *Jewish students express*
28 *concern over antisemitism on UCLA campus*, Daily Bruin (Nov. 19, 2023),
<https://perma.cc/TDP6-2876>.

1 Palestinian activists were seen on campus holding knives.¹⁸

2 75. Several Jewish students, including Shemuelian and Ghayoum,
3 were forced to miss class or attend class remotely to avoid pro-Palestinian
4 rallies on campus and out of fear for their own safety.

5 76. Activists also tore down and defaced posters depicting the names
6 and faces of the hostages brutally kidnapped by Hamas terrorists.

7 77. On December 5, 2023, more than 350 faculty circulated an open
8 letter to Chancellor Block and the UCLA administration explaining that
9 these demonstrations resulted in “Jewish students, staff and faculty who
10 are afraid to be on campus, show solidarity with Israel or practice their
11 freedom of religion in public.”¹⁹

12 78. On another occasion, a UCLA faculty member observed that the
13 message “Free Palestine, Fuck Jews” was scrawled on the bathroom wall
14 in Schoenberg, UCLA’s music building. That graffiti was washed away
15 by custodians. But after the cleaning, it was quickly replaced with new
16 graffiti: “Fuck Zionists.”

17 79. Figure 3 is an image of the “Fuck Zionists” graffiti in the music
18 building.

22 ¹⁸ House Comm. on Educ. & the Workforce, *Calling for Accountability:
23 Stopping Antisemitic College Chaos Before the H. Comm. on Educ. & the
24 Workforce*, 118th Cong. at 2:27:14-2:27:40, YouTube (May 23, 2024),
<https://bit.ly/3WYmUfm> (statement of Chancellor Block).

25 ¹⁹ See, e.g., UCLA Faculty Against Terror, *Op-ed: UCLA must condemn
26 Hamas attacks, fight antisemitism on campus*, Daily Bruin (Dec. 5, 2023),
27 <https://perma.cc/A6KU-XBFS>; Dylan Winward, *UCLA faces scrutiny for
28 safety issues at protests for Israel, Palestine*, Daily Bruin (Dec. 5, 2023),
<https://perma.cc/QQF8-U8F4>.

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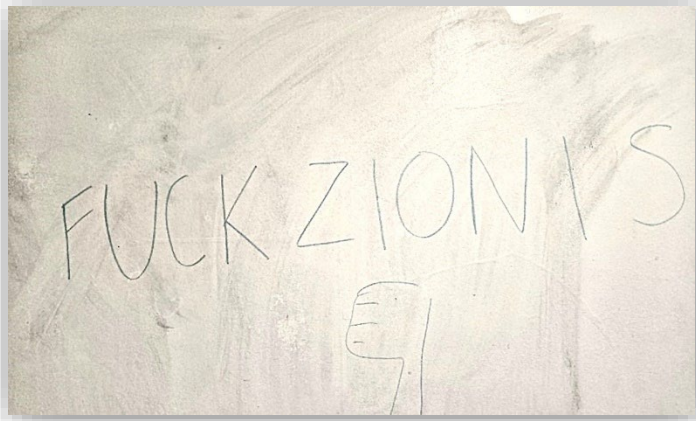


Figure 3

80. On December 6, 2023, Alpha Epsilon Pi—UCLA’s Jewish fraternity—was instructed by UCLA PD to hire extra security for a party it hosted as a safety precaution.

81. In February 2024, a scheduled talk at Royce Hall with former Israeli Minister of Foreign Affairs Tzipi Livni hosted by the Younes and Soraya Nazarian Center for Israel Studies was moved online in the wake of planned protests.²⁰

82. And, in late March 2024, an individual placed a disturbing antisemitic statue on campus in front of the UCLA Luskin Conference Center. The statue depicted a several-foot-tall pig holding a bag of money and a birdcage with a keffiyeh, alongside a bucket painted with a star of David.²¹

²⁰ See, e.g., Michael Starr, *Tzipi Livni UCLA talk moved online after anti-Israel protest*, The Jerusalem Post (Feb. 28, 2024), <https://perma.cc/L9LD-4GC7>.

²¹ See, e.g., David Myers, *Op-ed: Antisemitic imagery at UC Regents meeting protest threatens campus discourse*, Daily Bruin (Apr. 2, 2024), <https://perma.cc/E67X-LSJT>.

1 83. Figure 4 is a photograph of the statue.
2



10
11 Figure 4

12 84. This antisemitic statue was designed and intended to threaten
13 Jewish students and make them feel unsafe and unwelcome on UCLA's
14 campus.

15 85. The statue was far from the only public display of antisemitism on
16 the UCLA campus.

17 86. Antisemitic images and chants became commonplace on UCLA's
18 campus. Swastikas, other Nazi references, and other antisemitic imagery
19 appeared throughout campus.

20 **C. A Jew Exclusion Zone is Established on Campus, and
21 UCLA Facilitates It**

22 87. After a pro-Hamas protest encampment was established at
23 Columbia University on April 17, 2024, activists at other colleges and
24 universities around the country quickly began to copy the protest
25 strategy.²²

26 88. On April 25, 2024, a group of activists "established," as Chancellor

27 ²² See, e.g., Jonathan Park et al., *In Photos: A nation shaken by camps*
28 *for Gaza*, Daily Trojan (May 2, 2024), <https://perma.cc/XF2W-FRP8>.

1 Block described it, “an unauthorized physical encampment on part of the
2 Royce Quad.”²³

3 89. Royce Quad, also known as Dickson Plaza, is a large, grassy space
4 located between two buildings to its north (Royce Hall and Haines Hall),
5 and two buildings to its south (Powell Library and Kaplan Hall), which
6 represent the original four buildings of UCLA’s campus.

7 90. Royce Quad is one of the most-frequented areas on campus where
8 students gather during the day and between classes. It is also a
9 thoroughfare that students and faculty routinely use to access the rest of
10 UCLA’s campus, including buildings like the Student Activities Center
11 and the main recreational facility, the John Wooden Center, both of
12 which are located just southwest of the Quad. It is also located a short
13 walk from many academic buildings, including UCLA’s business school
14 and law school.

15 91. Royce Hall is considered “the symbol of UCLA,” “distinguished by
16 its impeccable beauty.”²⁴ Its award-winning auditorium hosts many
17 performances and events every year. Royce Hall also has seminar and
18 meeting rooms and hosts UCLA classes.

19 92. Powell Library, in turn, is UCLA’s main undergraduate library.
20 Powell Library is not only UCLA’s most popular place to study, but “also
21 offers a wide variety of programming, including exhibits, concerts,
22 dances, readings and other events that support student learning and
23 creativity.”²⁵

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25 ²³ Gene D. Block, *Affirming our Values in a Challenging Time*, UCLA
26 Chancellor (Apr. 30, 2024), <https://perma.cc/T79X-62MZ>.

27 ²⁴ UCLA, Royce Hall, <https://perma.cc/8FCB-W5HU>.

28 ²⁵ UCLA, Powell Library, <https://perma.cc/VG6D-LA6H>.

1 93. The encampment was set up on the Royce Quad near both Royce
2 Hall and Powell Library.²⁶

3 94. At times, it extended as far west as the Janss Steps, a long
4 staircase leading up to Royce Quad.

5 95. Those inside the encampment chanted antisemitic slurs like “this
6 is the final solution,” “fuck Israel,” “death to Jews,” “death to Israel,”
7 “*intifada* revolution,” and “from the River to the Sea.”

8 96. Chancellor Block has admitted in sworn testimony that “*intifada*
9 revolution” and “from the River to the Sea” are antisemitic slogans and
10 are potentially dangerous.²⁷

11 97. The use of antisemitic imagery was common. These images
12 included money symbols and other references that play on well-known
13 antisemitic tropes and posters with drawings of pigs. Inverted red
14 triangles, a common image used by Hamas to denote Jewish targets, were
15 also present.

16 98. Other activists held signs with the Star of David crossed out, a
17 swastika being compared to the Israeli flag, or reading “Nazionist.”

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23 ²⁶ See Julia Zhou et al., *Gallery: UCLA students supporting Palestine*
24 *organize encampment in Dickson Plaza*, Daily Bruin (Apr. 27, 2024),
25 <https://perma.cc/27KB-V3Y9>.

26 ²⁷ House Comm. on Educ. & the Workforce, *Calling for Accountability:*
27 *Stopping Antisemitic College Chaos*, 118th Cong. at 3:06:20-3:07:07:10,
28 YouTube (May 23, 2024), <https://www.youtube.com/watch?v=4bu4eGIDNss> (statement of Chancellor Block).

1 99. Figure 5 is a photograph of an antisemitic sign displayed near the
2 UCLA encampment.



16 Figure 5

17 100. Figure 6 depicts chalking on campus sidewalks with a swastika,
18 a star of David, and the “Nazionist” statement.



28 Figure 6

1 101. On at least one occasion, the word “Royce” on the “Royce Hall”
2 sign was replaced with the word “*Intifada*,” so that the sign read *Intifada*
3 Hall.

4 102. Figure 7 is a photograph of the activists’ sign dubbing Royce Hall
5 *Intifada* Hall.



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14 Figure 7

15 103. Others scrawled graffiti on campus buildings and displayed anti-
16 Jewish slogans on campus.

17 104. Figures 8 and 9 are photographs of examples of such statements.



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27 Figure 8



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1 105. Posters depicting the hostages kidnapped and tortured by
2 Hamas were also ripped down and defaced.

3 106. Some activists chalking Stars of David onto UCLA’s sidewalks
4 alongside directions to “Step Here.”

5 107. Figure 10 is a photograph of such a “Step Here” chalking.



15 Figure 10

16 108. The encampment was eventually reinforced with barricades, as
17 activists established checkpoints for the creation of a “Jew Exclusion
18 Zone.”

19 109. To pass through these checkpoints, a person needed to agree to
20 the activists’ “demands.” These “demands” required any person who
21 wished to enter the encampment to condemn Israel as a committer of
22 “apartheid[] and genocide of the Palestinian people,” to call for “an end
23 to the occupation and genocide in Palestine,” and to agree that UCLA
24 should “[s]ever all UC-wide connections to Israeli universities, including
25 study abroad programs, fellowships, seminars, and research
26 collaborations, and UCLA’s Nazarian Center.”

27 110. Even if the person expressed agreement with the activists’
28

1 demands, he would still be denied entry if there was no one already in
2 the encampment who would “vouch” for him.

3 111. If the person succeeded in finding someone who could vouch for
4 him, then he would be given a wristband or other form of pre-approved
5 identification and allowed to pass through.

6 112. At these checkpoints, students were frequently asked if they
7 were a “Zionist,” or accused of being “Zionists,” and were denied entry.
8 Others were denied passage simply for wearing a Star of David
9 necklace.²⁸

10 113. For example, one student was stopped by activists at the
11 encampment because “you don’t have a wristband” and then, when he
12 questioned why they wouldn’t let Jewish students in, he was asked, “[a]re
13 you a Zionist?” When he responded that he is a Zionist, the activists
14 responded that “we don’t let Zionists inside.”

15 114. On information and belief, a case manager within UCLA’s Office
16 of Equity, Diversity, and Inclusion called a UCLA student on or about
17 May 20, 2024, and asked the student if he was “aware that the protesters
18 had an agreement with the University to screen students based on their
19 viewpoints.”

20 115. These checkpoints prevented faculty, staff, and students from
21 accessing the Powell Library, Royce Hall, other classrooms and UCLA
22 facilities, and other areas of campus.

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²⁸ Jenny Jarvie, *‘Are You a Zionist?’ Checkpoints at UCLA encampment provoked fear, debate among Jews*, LA Times (May 9, 2024), <https://perma.cc/X3TG-EF4J>.

1 116. Figure 11 is a photograph of the UCLA encampment and the
2 barricade that the activists erected.



13 Figure 11

14 117. Defendants directed the UCLA PD not to intervene in the
15 disturbances on campus, including with respect to the encampment and
16 the Jew Exclusion Zone.

17 118. For example, on or about April 29, 2024, a parent of a Jewish
18 student called the UCLA PD and reported that her son had been denied
19 access to campus because he was Jewish and did not have an activist-
20 approved wristband. During the conversation, the police dispatcher said:
21 “the police are not intervening with that right now, and this is coming
22 from the University. So if you had any questions or concerns, you would
23 take it with the University itself. ... We have received a directive to not
24 intervene at this time, yes. ... I would suggest contacting the Chancellor’s
25 office or higher ups in the University with your concerns. ... We’re not
26 forcing them to move out of the area. ... All I’m saying is we’re not
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1 unblocking the entrances. ... The school is saying that they will not be
2 removed at this time.”

3 119. Moreover, Defendants stationed privately hired “CSC security
4 teams,” who wore uniforms or vests reading CSC and/or Event Staff, on
5 the outskirts of the encampment and other restricted areas. Seán Devine,
6 *Campus Activity Updates (April 27th)*, UCLA: Bruins Safe Online (Apr.
7 27, 2024), <https://perma.cc/FN87-7NCM>. Defendants also dispatched
8 “[s]afety personnel in Student Affairs Mitigators (SAMs) and Public
9 Safety Aides (PSAs) uniforms ... around the encampment site,” *id.*, as
10 well as other “campus security.”²⁹

11 120. CSC stands for Contemporary Services Corporation, which is a
12 private security company with experience managing crowds and
13 providing event security, including at colleges and universities.

14 121. Figure 12 shows the CSC staff that (as further described below)
15 stopped Plaintiff Shemuelian and ordered her away from the
16 encampment area.

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27 ²⁹ Seán Devine, *Campus Activity Updates (April 29th)*, UCLA: Bruins
28 Safe Online (Apr. 29, 2024), <https://perma.cc/Q46U-BS7Z>.



Figure 12

122. Defendants instructed these various security groups to discourage unapproved students from attempting to cross through the areas blocked by the activists.

123. Campus security staff, acting as agents of Defendants, directed students away from the encampment and, in some cases, stated that they needed permission from the activists to access the encampment, essentially acting as force multipliers to the activists manning the barricades.

124. The campus security staff turned away students, including Plaintiffs Josh Ghayoum and Eden Shemuelian, who were not approved by the activists and thus refused to allow or to help them pass through Royce Quad to Powell Library or Royce Hall.

125. Dozens of faculty members supported the activists in their efforts to set up and maintain the encampment.³⁰

³⁰ See, e.g., UCLA Department of History, *Statement of Members of the Department of History in Response to the Attack on the Encampment on*

1 126. Figure 13 is a photograph of a pro-encampment faculty protest
2 on April 29, 2024.³¹



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11 Figure 13

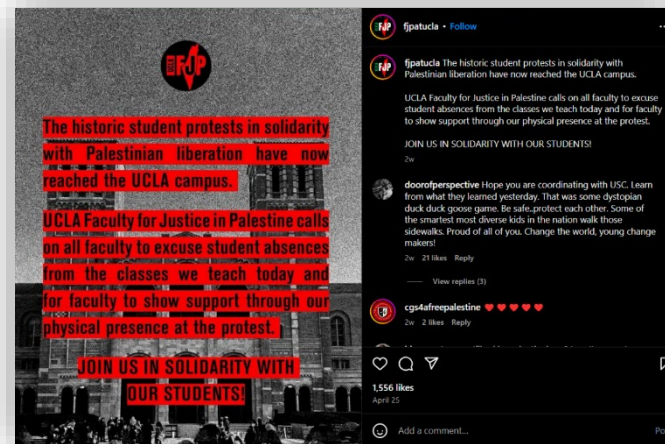
12 127. On information and belief, these faculty encouraged the activists
13 to maintain the encampment despite the rampant violations of stated
14 policy and encouraged the UCLA administration to continue to allow the
15 illegal encampment to remain in place unabated.

16 128. Faculty members called for fellow faculty to excuse student
17 absences related to presence at the encampment, and the UCLA Faculty
18 for Justice in Palestine called for “faculty to show support through [their]
19 physical presence at the protest.”

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22 ³⁰ April 2024, UCLA: Division of Social Sciences (May 1, 2024),
23 <https://perma.cc/AB66-7BKK> (members of the department were at the
24 encampment overnight); UCLA Department of History, *Statement of*
25 *Members of the Department of History in Response to Clearing the*
26 *Encampment*, UCLA: Division of Social Sciences (May 2, 2024),
<https://perma.cc/W727-9GV7>.

27 ³¹ Clara Harter, *UCLA faculty walk out as pro-Palestinian*
28 *demonstrations, counterprotests grow across California campuses*, East
Bay Times (Apr. 30, 2024), <https://perma.cc/94DE-ZG37>.

1 129. Figure 14 is a screenshot of a faculty group encouraging faculty
2 to attend the protest and excuse encampment-related absences.



11 Figure 14

12 130. Some UCLA staff and faculty members chose to host classes and
13 study sessions from inside the encampment and offered students
14 participating in the encampment better grades and extra credit.

15 131. For example, on April 30, 2024, while the encampment was still
16 in place, a lecturer within UCLA's labor studies department posted on X
17 a picture of himself standing outside a graffiti-covered barricade and
18 stated: "At UCLA's Free Palestine zone in solidarity with the students
19 in my class. I will do all our classes for from [sic] the encampment. Free
20 Palestine."

21 132. Other faculty cancelled classes or held office hours near the
22 encampment.

23 133. Faculty members were aware of the antisemitic nature of the
24 encampment and the systematic exclusion of Jewish students from the
25 encampment.

26 134. In fact, in an email sent on April 30, 2024, Plaintiff Ghayoum's
27 history professor stated that he would hold additional "office hours ...
28 across from the encampment, if there is some space" because he wished

1 to “give students holding down the encampment a chance to meet with
2 me.” If a student, such as Ghayoum, did not “feel comfortable coming in
3 close proximity to th[e] encampment,” such a student was required to
4 contact the professor separately to set up an appointment.

5 135. Students who disagreed with the encampment faced physical
6 violence.

7 136. On April 25, 2024, a group of agitators left the encampment,
8 surrounding members of a counter-protest, tearing down their signs,
9 taking pictures of them, and assaulting them. Some held images of an
10 inverted red triangle, a well-known symbol employed by Hamas to mark
11 Jewish military targets. In response, personnel wearing UCLA jackets
12 brought in metal barricades and directed staff to use them to expand the
13 protected area given to those in the encampment.

14 137. And on April 28, 2024, a female student suffered a concussion
15 after clashing with an encampment member. That same night, another
16 female student was pepper-sprayed by a member of the encampment.

17 **D. UCLA’s Response to the Anti-Jewish Segregation**

18 138. The encampment operated for five days without any
19 interference from Defendants, and indeed with their support via the
20 failure to enforce stated policies or allow ordinary law enforcement
21 intervention.

22 139. According to UCLA, the University would not “request law
23 enforcement involvement preemptively,” but “only if absolutely
24 necessary to protect the physical safety of our campus community.”³²

25 140. This toleration of clear violations of stated policies persisted
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27 ³² Seán Devine, *Campus Activity Updates (April 28th)*, UCLA: Bruins
28 Safe Online (Apr. 28, 2024), <https://perma.cc/33DY-F74E>.

1 even though UCLA acknowledged on April 29, 2024, that “some physical
2 altercations broke out among demonstrators on Royce Quad” the
3 previous day.³³

4 141. The very next day, Chancellor Block sent a letter to the entire
5 UCLA community acknowledging that the “unauthorized physical
6 encampment” had led to “frankly ... shocking and shameful” “tactics,”
7 that the encampment included “instances of violence completely at odds
8 with our values,” and that the encampment had resulted in “students on
9 their way to class [being] physically blocked from accessing parts of the
10 campus.”³⁴

11 142. He further acknowledged that these “shameful” tactics left
12 students feeling “bullied, threatened and afraid,” and left many,
13 “especially our Jewish students, in a state of anxiety and fear.”³⁵

14 143. Yet despite this knowledge, Defendants continued to refuse to
15 eliminate the Jew Exclusion Zone at the heart of its campus.

16 144. Instead, Chancellor Block continued to instruct the UCLA PD
17 not to intervene. As a result, many Jewish students, faculty, and staff
18 continued to be barred from accessing areas of campus.

19 145. The same day Chancellor Block sent his letter, the University
20 acknowledged that the encampment was impeding student access to
21 certain parts of campus.

22 146. At 8:00 AM, the University sent a Campus Activity Update
23 tagged as a “Public Safety” alert stating that “The access to Royce Quad
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25 ³³ Seán Devine, *Campus Activity Updates (April 29th)*, UCLA: Bruins
26 Safe Online (Apr. 29, 2024), <https://perma.cc/Q46U-BS7Z>.

27 ³⁴ Block, *supra* note 23.

28 ³⁵ *Id.*

1 is limited and as such, please enter Powell and Kaplan Hall from the
2 south-facing entrances; Royce and Haines Hall are accessible through
3 the north or west entrances. We will continue to ensure people on
4 campus know about the demonstration so they can avoid the area if they
5 wish. This includes having student affairs representatives stationed
6 near Royce quad to let Bruins and visitors know about the encampment,
7 redirect them if desired and to serve as a resource for their needs.”³⁶

8 147. That same afternoon, the University announced that “[a]ccess
9 to Royce Hall is now closed through Friday. Alternate locations are being
10 identified as options for classes taking place in Royce. Instructors will
11 inform students about further information regarding class location.
12 Faculty should reach out to their departments for possible classroom
13 reassignments.” UCLA also closed Powell Library early at 5 PM.³⁷

14 148. The alerts did not direct activists to remove the barricades—and
15 did nothing to ensure that Jewish faculty and staff could access academic
16 buildings and Royce Quad.

17 149. In sum, Defendants acknowledged the threat to Jewish
18 students, opted to officially close crucial academic buildings to facilitate
19 the encampment, and did nothing to clear the illegal encampment or
20 stop agitators at the encampment from blocking access to Powell Library
21 and other buildings on Royce Quad or to guarantee the ability of Jewish
22 students to traverse campus safely and freely.

23 150. After refusing to intervene to protect the rights of Jewish
24 students for days, Defendants authorized UCLA PD and outside law

25 ³⁶ Seán Devine, *Campus Activity Updates (April 30th at 8:00AM)*, UCLA:
26 Bruins Safe Online (Apr. 30, 2024), <https://perma.cc/39EX-FXGR>.

27 ³⁷ Seán Devine, *Campus Activity Updates (April 30th at 4:25PM)*, UCLA:
28 Bruins Safe Online (Apr. 30, 2024), <https://perma.cc/2XHC-8HKB>.

1 enforcement to intervene when a confrontation between encampment
2 members and counter-protesters escalated into a violent clash on the
3 evening of April 30, 2024.

4 151. UCLA PD and LAPD intervened to separate the fighters but
5 continued to allow the encampment to remain in place, including the
6 barricades.

7 152. Defendants made the decision to allow the encampment to
8 remain in place. On the morning of May 1, Chancellor Block sent an
9 email to the entire campus community, condemning “the attack on the
10 encampment that has been established ... to advocate for Palestinian
11 rights” by “a group of instigators.” It was only after this “attack” that
12 UCLA decided to “request[] support from external law enforcement
13 agencies to help end this appalling assault, quell the fighting and protect
14 our community.” The email said nothing about prior attacks—both
15 physical and verbal—on Jewish students as they tried to access
16 academic buildings and traverse Royce Quad, nor did it promise to allow
17 safe passage to Jewish students going forward.

18 153. In fact, the encampment remained in place on May 1, 2024.
19 UCLA and Defendants did not restore full access to campus for Plaintiffs
20 or other Jewish faculty, staff, and students. Instead, UCLA took several
21 actions, including cancelling “all classes” on May 1, keeping Royce Hall
22 closed at least through May 3, closing Powell Library through the
23 weekend, and requiring remote classes during May 2 and 3.³⁸ UCLA also
24 closed other areas of campus, including Geffen Academy, Lab School,
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27 ³⁸ Seán Devine, *Campus Activity Updates (May 1st at 8:00 AM)*, UCLA:
28 Bruins Safe Online (May 1, 2024), <https://perma.cc/8SLY-QNLW>.

1 and Early Care and Education.³⁹

2 154. The next day, Chancellor Block sent a second email,
3 acknowledging that the encampment was “unlawful” and “a breach of
4 policy” that his administration had nonetheless “allowed ... to remain in
5 place” and that it had resulted in “demonstrators directly interfer[ing]
6 with instruction by blocking students’ pathways to classrooms” for
7 “several days.”⁴⁰ The email explained that on the morning of May 2,
8 UCLA finally asked “UCPD and outside law enforcement officers to
9 enter and clear the encampment.”⁴¹

10 155. The email went on to describe the “carefully developed” plan
11 that law enforcement used to clear the encampment, which included
12 “giv[ing] [the activists] several warnings” and “offer[ing] them several
13 opportunities to leave peacefully before officers entered the area.”

14 156. Chancellor Block has admitted in sworn testimony that the
15 “encampment was against policy” and “violated time, place, and
16 manner.” And he has stated that he and the University administration
17 “should have been prepared to immediately remove the encampment if
18 and when the safety of our community was put at risk.”⁴²

19
20 ³⁹ Seán Devine, *Campus Activity Updates (May 1st at 6:30PM)*, UCLA:
21 Bruins Safe Online (May 1, 2024), <https://perma.cc/3XXA-FLEC> (“all in-
22 person classes are authorized and required to pivot to remote”
for May 2-3).

23 ⁴⁰ Gene D. Block, *Our Community is in Deep Pain*, UCLA Chancellor
24 (May 2, 2024), <https://perma.cc/E66L-Q5UA>.

25 ⁴¹ *Id.*

26 ⁴² House Comm. on Educ. & the Workforce, *Calling for Accountability:*
27 *Stopping Antisemitic College Chaos*, 118th Cong. at 2:45:21-2:45:27,
28 45:03:00-45:08:00 YouTube (May 23, 2024), [https://www.youtube.com/
watch?v=4bu4eGIDNss](https://www.youtube.com/watch?v=4bu4eGIDNss) (statement of Chancellor Block).

1 157. His administration’s failed response to the encampment led
2 Chancellor Block to conclude that “urgent changes [were] needed in how
3 we administer safety operations.”⁴³

4 158. Thus, on May 5, 2024, Chancellor Block announced the creation
5 of a new “Office of Campus Safety” that reports directly to Block and
6 that is tasked with overseeing UCLA PD and other departments.⁴⁴ Block
7 also announced the creation of “a formal advisory group with expert
8 leaders” to assist this newly created office.⁴⁵

9 159. Chancellor Block tapped Defendant Rick Braziel to lead the
10 Office of Campus Safety “as its inaugural associate vice chancellor.”⁴⁶

11 **E. Radical Groups Threaten Further Lawlessness on UCLA’s**
12 **Campus**

13 160. UCLA’s tardy decision to finally end the blatant segregation and
14 targeted harassment of Jews did not bring an end to the matter.

15 161. Radical groups affiliated with the encampment have continued
16 to call for similar actions and have even threatened that bolder actions
17 are soon to follow.

18 162. Even after the encampment was taken down, UCLA’s campus
19 has been consumed with anti-Israel protests and further attempts at
20 occupying parts of campus.

21 163. The same day the encampment was finally cleared, Students for
22 Justice in Palestine at UCLA, one of the primary organizers of the
23

24 ⁴³ Gene D. Block, *Changes to Campus Security Operations*, UCLA
25 Chancellor (May 5, 2024), <https://perma.cc/Y9DV-4A3H>.

26 ⁴⁴ *Id.*

27 ⁴⁵ *Id.*

28 ⁴⁶ *Id.*

1 encampment, promised “we will not stop, we will not rest.”⁴⁷

2 164. And, four days after the encampment was cleared, activists
3 associated with the encampment posted a letter in the name of the “The
4 Determined Palestine Solidarity Encampment,” stating “we will not rest
5 until they divest.”⁴⁸

6 165. Some have already made good on these threats. For example,
7 activists attempted to occupy Moore Hall—home to the UCLA School of
8 Education and Information Studies—on May 6, 2024.

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25 ⁴⁷ UCLA Palestine Solidarity Encampment, *Precursory Statement from*
26 *UCLA Palestine Solidarity Encampment* (May 2, 2024),
<https://perma.cc/Y3P9-3MCK>.

27 ⁴⁸ Palestine Solidarity Encampment at UCLA, *Refusing Co-optation*
28 (May 6, 2024), <https://perma.cc/TW3A-BZXY>.

1 166. Figure 15 shows an Instagram post from Students for Justice in
2 Palestine at UCLA calling for students to occupy Moore Hall on May 6,
3 2024.⁴⁹

4 167. Figure 16 shows a door in Moore Hall with text over the top
5 posted by Students for Justice in Palestine at UCLA.⁵⁰



17 Figure 15



24 Figure 16

25 168. One week later, on May 13, 2024, Students for Justice in
26 Palestine at UCLA and other affiliated groups called for activists to block
27 access to two parking decks on campus.⁵¹ In response, numerous activists
28 marched and chanted in front of the parking deck and blocked access to
the entrance point.

49 @SJPatUCLA, Instagram (May 6, 2024), <https://bit.ly/3RAE1R5> (call to assemble at Moore Hall).

50 @SJPatUCLA, Instagram Story (May 6, 2024) (photo of occupation of Moore Hall).

51 @SJPatUCLA, Instagram (May 13, 2024), <https://perma.cc/44CJ-XEJW?type=image>.

1 169. Figure 17 shows an image of an Instagram post by Students for
 2 Justice in Palestine at UCLA calling for activists to assemble to block the
 3 parking decks.



15 Figure 17

16 170. These actions and the aftermath of the encampment have
 17 continued to wreak havoc on normal University operations and access to
 18 campus.

19 171. For instance, Transfer Bruin Day, originally scheduled to be held
 20 on May 11, 2024, was postponed and moved online in response to ongoing
 21 threats of disruption.⁵²

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25 ⁵² See Seán Devine, *Recent Updates, UCLA: Bruins Safe Online* (May 6-
 26 11, 2024), <https://perma.cc/NQM2-YGK9>; see also Alexandra Crosnoe,
 27 *Transfer Bruin Day postponed, moved online following on-campus*
 28 *demonstrations*, Daily Bruin (May 9, 2024), [https://perma.cc/Q6CG-](https://perma.cc/Q6CG-LMFE)
 LMFE.

1 172. UCLA also extended its requirement for classes to be held
2 remotely over the weekend of May 4 and 5.⁵³ And though UCLA
3 attempted to return to in-person learning on May 6, that plan proved to
4 be short-lived.

5 173. Early on the morning of May 6, 2024, the University declared
6 that “[c]lasses and work in Moore Hall will be remote today due to
7 ongoing disruptions.”⁵⁴

8 174. Later that same day, the University announced that “[a]ll classes
9 are moving remote today and campus operations are limited due to
10 ongoing disruptions.”⁵⁵ An announcement that afternoon declared that
11 classes would be remote for May 6th through 10th.⁵⁶

12 175. That announcement also stated that “Royce Hall and Powell
13 Library are closed and will remain so through Friday, May 10.”⁵⁷

14 176. Starting May 14, 2024, the same groups that ran the
15 encampment put on a series of full-day “teach-in” events on Royce Quad
16 “to reclaim both [their] space and ideas.”

17 177. On the morning of May 23, 2024, the same day that Chancellor
18 Block testified to Congress about antisemitism on UCLA’s campus, the
19 groups who instigated the original encampment established a new
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21 ⁵³ Seán Devine, *Campus Activity Updates (May 3rd)*, UCLA: Bruins Safe
22 Online (May 3, 2024), <https://perma.cc/R2F8-MKVS>.

23 ⁵⁴ Seán Devine, *Campus Activity Updates (May 6th at 8:30AM)*, UCLA:
24 Bruins Safe Online (May 6, 2024), <https://perma.cc/L4FM-VM4Y>.

25 ⁵⁵ Seán Devine, *Campus Activity Updates (May 6th at 10:15AM)*, UCLA:
26 Bruins Safe Online (May 6, 2024), <https://perma.cc/P5N7-4GW6>.

27 ⁵⁶ Seán Devine, *Campus Activity Updates (May 6th at 4:00PM)*, UCLA:
28 Bruins Safe Online (May 6, 2024), <https://perma.cc/E5KD-Y67Y>.

⁵⁷ *Id.*

1 encampment, setting up tents and barricades on Kerckhoff Patio, near
2 the Bruin Walk thoroughfare.

3 178. In response, law enforcement and security staff set up a
4 perimeter to prevent food and supplies from reaching the encampment.
5 After UCLA issued a statement declaring the encampment unlawful⁵⁸
6 and law enforcement began moving in, the activists relocated to Murphy
7 Hall and then Dodd Hall before finally calling off the efforts.

8 **F. Yitzchok Frankel**

9 179. Yitzchok Frankel is a law student who completed his second year
10 at UCLA School of Law in the Spring of 2024.

11 180. Frankel is an Orthodox Jew, and has been so for his whole life.

12 181. Frankel is also the descendant of Holocaust survivors on both
13 sides of his family. His family was so severely impacted by the Holocaust
14 that only four members of his paternal grandfather's family survived.

15 182. Consistent with his Orthodox Jewish faith, Frankel keeps
16 kosher, strictly observes Shabbat and all Jewish holidays, and wears a
17 kippah.

18 183. Frankel and his wife are also dedicated to raising their four
19 children in the Jewish faith and send them to Orthodox Jewish schools.
20 The Frankel family regularly attends synagogue in the Los Angeles area.

21 184. Frankel attended Orthodox Jewish day schools for his primary
22 education and completed his undergraduate degree at Yeshiva
23 University—a leading Orthodox Jewish institution of higher learning in
24 the United States.

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27 ⁵⁸ UCLA Newsroom, *Statement on demonstrators on Kerckhoff patio*
28 (May 23, 2024), <https://perma.cc/FYC3-M648>.

1 185. After completing his undergraduate degree, Frankel worked at
2 an Orthodox Jewish boys school, YULA High School, in Los Angeles for
3 five years, and completed an online masters degree from Yeshiva
4 University.

5 186. Frankel has strong ties to Israel. He has visited Israel
6 approximately eight times, including one trip where he spent six weeks
7 studying the Talmud at a yeshiva.

8 187. Each time Frankel journeys to Israel, he visits the *Kotel*—the
9 only remaining vestige of the Temple destroyed by the Roman Empire in
10 70 CE along with the rest of Jerusalem. While there, he engages in
11 “tearing *kriah*,” the ritualistic act of rending one’s garments as an act of
12 mourning for the destruction of the Jewish Temple.

13 188. Frankel seeks to follow Jewish law (*halacha*), which prohibits
14 speaking ill of or defaming the land of Israel. *See, e.g.*, Rabbi Eliezer
15 Melamed, *Peninei Halakhah*, *The Nation and the Land* 3:11; *see also*
16 *Talmud Bavli, Erchin* 15a (describing punishment meted out for
17 speaking ill of the land of Israel); *Talmud Bavli, Ketubot* 112a-112b
18 (describing precautions taken by rabbis to ensure that no ill would be
19 spoken of the land of Israel). Thus, Frankel believes, as a matter of his
20 religious faith, that he must support Israel.

21 189. Like many other Jews around the world, Frankel also engaged
22 in a ritual at his wedding that marks the connection between all Jews
23 and Israel: as the bridegroom, he crushed a glass with his foot at the end
24 of the wedding ceremony. This is meant to symbolize and recall to
25 memory the destruction of the Temple in Jerusalem by the Roman
26 Empire. Immediately before Frankel broke the glass, those assembled
27 sang “If I forget you, Yerushalayim, let my right hand forget how to work.
28 Let my tongue stick to the roof of my mouth if I do not remember you. If

1 I do not set Yerushalayim above my chiefest joy.” For this reason, too,
2 Frankel cannot disavow his connection to Israel.

3 190. Frankel also engages in the daily *Amidah* prayer petitioning for
4 the coming of the Messiah and the return of all Jews to Israel. To
5 Frankel, these prayers emphasize that all Jews, whether living in Israel
6 or abroad, have a religious duty to support Israel.

7 191. Frankel is a vice president for the Jewish Law Students
8 Association which, among other things, bakes pastries for Jewish
9 holidays, holds Shabbat dinners, and occasionally gathers to study
10 Torah.

11 192. After the October 7 attacks, Frankel began to wear a shirt
12 depicting an American and Israeli flag nearly every day as a sign of his
13 support for Israel and his Jewish identity.

14 193. Frankel began to notice a rise in antisemitic activity on UCLA’s
15 campus after October 7, 2023.

16 194. Frankel observed on repeated occasions that “Bring Them Home”
17 posters depicting the names and faces of hostages kidnapped and
18 tortured by Hamas had been torn down, including posters displayed in
19 areas specifically reserved for the Jewish Law Students Association.

20 195. On information and belief, UCLA has not taken any action
21 against these individuals.

22 196. Frankel also frequently observed individuals wearing “anti-
23 Zionist social club” t-shirts.

24 197. Frankel was also present at UCLA School of Law on November 8
25 and November 21, 2023, when large numbers of activists took over the
26 law school and its courtyard, chanting antisemitic phrases like “there is
27 only one solution, *intifada* revolution,” and carrying signs.

28 198. Frankel also reported an antisemitic incident after another

1 student accused him of harassing other students on campus merely
2 because he was wearing a kippah and a shirt showing an American and
3 Israeli flag.

4 199. Frankel was directly impacted by UCLA's refusal to dismantle
5 the Jew Exclusion Zone.

6 200. Frankel frequently traverses Royce Quad to get from the law
7 school to other locations on campus, including Kerckhoff Coffeehouse and
8 other food establishments, and to purchase items from the campus store.

9 201. Frankel also frequently walks around Royce Quad in between
10 classes, sometimes to take breaks, other times while engaged in long
11 telephone conversations or when meeting with his law school mentee.

12 202. Frankel has also brought his young children to Royce Quad on
13 numerous occasions to socialize as a family.

14 203. Because of the establishment of the Jew Exclusion Zone and his
15 knowledge that he could not go through the encampment without
16 violating his faith by disavowing Israel, Frankel ceased all of these
17 activities.

18 204. Frankel was the direct recipient of antisemitic harassment
19 resulting from the encampment.

20 205. On April 25, 2024, the first day the encampment was in place,
21 Frankel attended a peaceful rally held by Jewish students and other
22 protesters who support Israel's right to exist.

23 206. While he was there, a masked female student came up to
24 Frankel, holding a sign with an inverted red triangle in his face.

25 207. Later, masked participants in the encampment left the
26 encampment and surrounded these observers, including Frankel, tearing
27 at their signs and pushing them.

28

1 208. Security not only failed to intervene, it actively assisted the
2 encampment participants.

3 209. A UCLA security guard brought out metal barricades and
4 directed other staff to set up the barricades around the protesters—in
5 effect expanding the protected area of the encampment and leaving
6 Jewish students including Frankel stranded inside.

7 210. A line of security guards wearing blue shirts and mounted on
8 bicycles also sat idly by, refusing to intervene.

9 211. Later, three masked female students holding a triangular red
10 bike light stood in front of Frankel, mocking him and taking pictures.

11 212. Frankel knew that he could not approach the barricades and
12 walk through the encampment without disavowing Israel's right to exist
13 in direct contravention of his Jewish faith.

14 213. On April 28, 2024, Frankel again participated in a rally near the
15 encampment with other Jewish students.

16 214. Again, masked participants from the encampment left the
17 encampment and flanked the protesters, beginning to yell, push, and
18 shove.

19 215. As was the case in the April 25, 2024, encounter with the
20 encampment, security did nothing to intervene.

21 **G. Joshua Ghayoum**

22 216. Joshua Ghayoum is a UCLA sophomore studying history and
23 pre-law. Ghayoum is Jewish and the child of Persian immigrants who
24 came to the United States fleeing antisemitism in Iran.

25 217. Ghayoum grew up learning Judaism from his family and
26 attended Hebrew school from age five through thirteen, when he had his
27 *bar mitzvah*.

28

1 218. Ghayoum has visited Israel on three different occasions. He
2 plans to return a fourth time this summer as part of the Onward
3 Birthright program, which aims to “create a long-lasting connection with
4 Israel and to make the strong commitment to Jewish life and community
5 that future generations depend on.”

6 219. Ghayoum has family and a significant number of friends who live
7 in Israel and a significant interest in Israel’s religious sites. He considers
8 Israel a second home.

9 220. Ghayoum observes the religious tenets of Judaism including
10 observing Shabbat, attending synagogue weekly, and keeping the Jewish
11 holidays.

12 221. Since he was 13, Ghayoum has worn a necklace that displays a
13 Star of David.

14 222. For Ghayoum, support for Israel is both a religious obligation
15 and part of his ethnic cultural identity. For these reasons, he cannot
16 forswear Israel and its right to exist.

17 223. Ghayoum is a member of UCLA’s Jewish fraternity, Alpha
18 Epsilon Pi. The fraternity’s building is adorned with a Star of David and
19 a mezuzah hangs on the doorpost.

20 224. Members of Alpha Epsilon Pi observe Jewish holidays together.
21 For example, they frequently host Shabbat dinners and annually
22 construct a Sukkah.

23 225. The fraternity often hosts UCLA’s Chabad rabbi at the
24 fraternity’s house to pray, discuss Jewish history, and spend time
25 together.

26 226. Ghayoum is closely involved with the Persian Community at
27 Hillel (PCH), a subgroup of UCLA’s chapter of Hillel. Ghayoum observes
28

1 Shabbat along with other members of the PCH community and attends
2 other Jewish events.

3 227. Ghayoum chose to attend UCLA for its prestigious reputation,
4 but his relationship with Royce Quad began long before.

5 228. As an area resident living near UCLA, Ghayoum often traveled
6 to Royce Quad with his family to play soccer, throw frisbees, play on
7 scooters, and engage in other social activities with family and friends.

8 229. Ghayoum and his family took pictures at Royce Quad to
9 commemorate a sibling's *bar mitzvah*.

10 230. Beginning after Hamas's vicious attack on Israel, Ghayoum
11 witnessed numerous raucous anti-Israel demonstrations, which often
12 included antisemitic chants.

13 231. These demonstrations normally started at the bottom of the
14 Janss Steps and went up through Royce Quad, the same area where the
15 encampment would later be set up.

16 232. During these demonstrations, Ghayoum repeatedly heard chants
17 of "from the River to the Sea, Palestine will be free" and "this is the final
18 solution."

19 233. Ghayoum also witnessed demonstrators tearing down posters
20 showing Jewish hostages of Hamas.

21 234. Ghayoum experienced the effects of these demonstrations
22 personally.

23 235. In early December 2023, the UCLA PD informed Alpha Epsilon
24 Pi that it should consider hiring private security for a party it planned to
25 host on December 6. The fraternity hired private security, and UCLA
26 police officers ended up standing outside the fraternity house for the
27 duration of the party.

28

1 236. Even though anti-Israel protests were common, Ghayoum
2 actively and proudly voiced his opposition to these anti-Jewish
3 sentiments, challenging students who were expressing anti-Jewish
4 views.

5 237. Ghayoum has personally been impacted by UCLA's
6 segregationist encampment.

7 238. On one occasion while he was near the encampment, Ghayoum
8 heard activists chanting "death to Israel" and "death to Jews."

9 239. Ghayoum was stopped twice at encampment checkpoints while
10 attempting to enter Powell Library and to access Ackerman Union.

11 240. On the first occasion, while attempting to get to Powell Library
12 to study for his midterms, Ghayoum encountered a massive barricade
13 flanked by security. A security guard informed Ghayoum that he could
14 not proceed past the barricade. Ghayoum walked to the other end of the
15 barricade, only to be confronted by a second security guard who gave the
16 same instruction.

17 241. Both security guards wore yellow vests reading "CSC."

18 242. Based on knowledge of the encampment's lawlessness, Ghayoum
19 knew that if he jumped the barricade, he risked facing violence. So he
20 abandoned his plans to study in the library altogether.

21 243. On a second occasion, Ghayoum attempted to meet a friend at
22 Ackerman Union. He had made his way through approximately two-
23 thirds of the occupied area, and was approaching Janss Steps, when he
24 was stopped by a male approximately in his early twenties and told he
25 could not proceed without showing a red wristband.

26 244. Ghayoum attempted to continue walking, but the individual
27 signaled for three other male individuals of the same approximate age to
28 join him. The four men stood in a line in front of Ghayoum, repeatedly

1 demanding to see his hands and wristband and telling him he could not
2 walk down Janss Steps.

3 245. The four men aggressively walked toward Ghayoum, forcing him
4 to walk backward away from the Steps. Occasionally, the activists made
5 physical contact with Ghayoum.

6 246. Ghayoum felt as though, had he continued to walk forward, the
7 four activists would have physically stopped him, and he felt confident
8 that they would have also called in reinforcements.

9 247. Disavowing Israel would be a betrayal of Ghayoum's Jewish
10 faith.

11 248. Knowing that the situation would escalate if he continued to
12 assert his rights, Ghayoum abandoned his effort and cancelled the
13 meeting with his friend. He also understood that any further attempts to
14 access the Jew Exclusion Zone would be futile.

15 249. The presence of the encampment limited Ghayoum's access to
16 the undergraduate library. He generally uses the library as a resource
17 and a place for solo and group study. But because the encampment
18 members blocked access to the library, Ghayoum was not able to use the
19 library to study for midterm exams.

20 250. In an email sent on April 30, 2024, Ghayoum's history professor
21 stated that he would hold additional "office hours ... across from the
22 encampment, if there is some space" because he wished to "give students
23 holding down the encampment a chance to meet with me." If a student,
24 such as Ghayoum, did not "feel comfortable coming in close proximity to
25 th[e] encampment," such a student was required to contact the professor
26 separately to set up an appointment.

27 251. That same professor later scheduled a "teach-in at or near the
28 site of the encampment" in lieu of having class. He stated that students

1 were not required to attend, explaining that “I know there are folks so
2 traumatized by the fascist/zionist/police assaults on those very grounds
3 that returning can be triggering.”

4 252. As a result of the encampment, Ghayoum feels that it is no longer
5 safe to voice opposition to activists expressing anti-Jewish sentiments,
6 and thus he has in fact ceased doing so. For instance, when discussion
7 over a class group project turned to criticizing Israel for its “genocide,”
8 Ghayoum opted to stay silent rather than express his views.

9 253. The encampment directly affected Ghayoum’s class attendance.

10 254. Ghayoum has one class located in Haines Hall, which abuts
11 Royce Quad. Thus, to attend class, Ghayoum would need to directly
12 confront the encampment and its activists.

13 255. Because of his class’s close proximity to the encampment, the
14 encampment’s overall threatening atmosphere, and his knowledge that
15 he could not pass through the encampment due to his Judaism, Ghayoum
16 was forced to miss at least four days of class, opting instead to listen to
17 class recordings.

18 256. The intimidating atmosphere of the encampment meant that
19 Ghayoum did not wish to enter campus at all.

20 **H. Eden Shemuelian**

21 257. Eden Shemuelian is a first-generation undergraduate and
22 graduate student. She attended UCLA as an undergraduate and
23 completed her second year at UCLA School of Law in the Spring of 2024.

24 258. Shemuelian is Jewish and grew up learning about and
25 participating in her faith by attending Hebrew school, becoming a *bat*
26 *mitzvah*, celebrating Jewish holidays, and observing Shabbat.

27 259. After her *bat mitzvah*, Shemuelian continued her involvement by
28 teaching Hebrew to younger children each Sunday.

1 260. Shemuelian continues to observe Jewish holidays and Shabbat,
2 and attends synagogue with her family.

3 261. Shemuelian wears a Star of David pendant as a sign of her
4 religious faith and commitment to the Jewish people.

5 262. Shemuelian's father is Israeli, and she has family in Israel.

6 263. Shemuelian has learned a lot about her Jewish faith on her
7 regular trips to visit her family in Israel, including on a 2018 Birthright
8 trip, where she visited cultural and religious sites important to the
9 Jewish people.

10 264. Israel is at the core of Shemuelian's Jewish identity. Israel
11 represents the homeland of the Jewish people, given to them by God and
12 set aside for them for thousands of years.

13 265. For Shemuelian, Judaism is synonymous with supporting Israel.
14 To be a faithful Jew means to support the right of Israel to exist.

15 266. Shemuelian decided to attend UCLA as an undergraduate after
16 making a campus visit and falling in love with its beauty.

17 267. In particular, Royce Quad stood out to Shemuelian as an iconic
18 representation of UCLA's beautiful architecture and spirit of
19 camaraderie.

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1 268. Figure 18 is a picture Shemuelian took of Royce Hall while
2 touring UCLA's campus in 2016.



15 Figure 18

16 269. Shemuelian decided to pursue her law degree at UCLA after
17 spending her undergraduate years steeped in UCLA's rigorous academics
18 and its strong sense of collegiality.

19 270. That sense of collegiality carried over into Shemuelian's first
20 year of law school, but evaporated quickly beginning after October 7,
21 2023.

22 271. After October 7, 2023, Shemuelian began to witness an increase
23 in antisemitic activity on campus, alongside a corresponding lack of
24 interest by faculty and administration to put it to an end.

25 272. Protests regularly took place at UCLA's law school, replete with
26 antisemitic language and imagery.

27 273. On many occasions, Shemuelian saw swastikas on campus.
28

1 274. On October 30, 2023, two activists ripped down “bring them
2 home” posters that Shemuelian and her friends had hung near the law
3 school featuring the names and faces of the hostages kidnapped and held
4 in captivity by Hamas. Shemuelian saw these posters ripped down on
5 multiple other occasions, including when posters were hung on bulletin
6 board space dedicated to the Jewish Law Students Association.

7 275. On November 8, 2023, hundreds of agitators—many of them
8 masked—swarmed into the law school and took over the building. They
9 chanted various slogans including “death to Israel,” “death to Jews,”
10 “there is only one solution,” “*intifada*,” and “from the River to the Sea”
11 while standing approximately ten feet away from Shemuelian.

12 276. After this protest, Shemuelian wrote to Michael Waterstone, the
13 Dean of the School of Law, copying Chancellor Block and the Student
14 Affairs Office. The email described the protest and poster vandalism in
15 detail, explaining that these events left Shemuelian and other Jewish
16 students “shaking, crying, unable to breathe, and dizzy.”

17 277. The email continued: “this school has not been a safe space for
18 me and my Jewish peers for the past few weeks. I chose to attend this
19 university to receive an education. If I had known I would be faced with
20 extreme antisemitism on a daily basis, I would have committed
21 elsewhere. I have not been able to sit in class and learn for the past 34
22 days, especially when these students sit behind me in my classes four
23 days a week with their Palestinian resistance/terrorist scarves (and only
24 seconds before class is to begin, they are chanting for the genocide of my
25 people).”

26 278. Shemuelian also stated that because of this and other protests,
27 she did not feel safe to attend class in person, opting instead to attend
28 her lectures online.

1 279. The email identified specific students who had participated in
2 the protests.

3 280. Dean Waterstone also forwarded the email to UCLA's Dean of
4 Students, Jasmine Rush, since "this type and the handling of these
5 incidents happens at the University level." The Dean of Students
6 "confirmed receipt" of the email.

7 281. On information and belief, none of these students was ever
8 punished.

9 282. Because no action was taken, Shemuelian ceased attending any
10 of her classes in person because of the fear and intimidation caused by
11 hearing antisemitic chants every time she entered the school.

12 283. Shemuelian also severely curtailed the number of hours she
13 worked for the Ziffren Institute for Media, Entertainment, Technology &
14 Sports Law at the law school.

15 284. Shemuelian was also personally impacted by UCLA's Jew
16 Exclusion Zone.

17 285. The encampment's location on Royce Quad was approximately a
18 three-minute walk from the law school building. Along with many other
19 law students, Shemuelian frequently leaves the law school and walks
20 through Royce Quad to access other parts of campus, including to get food
21 and coffee at other campus locations.

22 286. Because of Royce Quad's central location, and her affinity for the
23 space that developed as an undergrad, Shemuelian also frequently takes
24 study breaks to walk around Royce Quad to get some exercise and fresh
25 air.

26 287. Because of the encampment and her knowledge that Jewish
27 students were being denied access to Royce Quad and academic
28

1 buildings, Shemuelian ceased all of this activity, opting instead to stay
2 home or to not leave the law school at all.

3 288. On April 26, 2024, Shemuelian attempted to observe the
4 encampment and its activities. Shemuelian approached the barricade,
5 joining other students wearing Jewish garb such as kippahs and Stars of
6 David or holding Israeli flags.

7 289. While standing about three feet from the barricade, she
8 attempted to read the signs and hear the chants taking place within the
9 encampment. Shemuelian saw signs reading “Fuck Israel” and “From the
10 River to the Sea,” and depicting red inverted triangles—including on the
11 encampment’s “official” sign. She also saw signs equating Israel and the
12 Israeli Defense Force to the Ku Klux Klan and white supremacy. Many
13 of the activists inside the encampment were masked.

14 290. Rather than ensuring that Jewish students could pass safely
15 through the areas to access Royce Quad, Powell Library, Royce Hall, and
16 other locations on campus, Shemuelian witnessed security instead acting
17 to stop individuals from passing through.

18 291. Thus, security acted as a force multiplier for the activists in the
19 encampment.

20 292. For instance, a man in a light blue polo shirt that said “Security
21 Staff” with a logo depicting “CSC” who was standing on the outside of the
22 barricade began to chastise Shemuelian.

23 293. Though Shemuelian simply stood and watched silently, the CSC
24 staff member told her that she either needed to come into the
25 encampment and participate or leave the area.

26 294. The CSC member told Shemuelian that he had “been asked to
27 keep this area [in front of the encampment] clear” and that he was “not
28 the problem, you guys are.”

1 295. Additionally, a group of security guards sitting on bikes and
2 wearing blue shirts emblazoned with CSC mocked Shemuelian and the
3 other Jewish observers, laughing at a male student singing in Hebrew
4 who was yelled at by activists, jeering at the students when they
5 professed anger at not being able to pass through, and repeatedly telling
6 Shemuelian and the other Jewish students that they needed to leave.

7 296. Shemuelian also witnessed a student wearing a kippah and
8 holding a pro-Israel sign being told by these same security guards to leave
9 the area near the encampment.

10 297. As a result of these actions by security, Shemuelian was forced
11 to leave the area.

12 298. Shemuelian knew that she could not pass through the
13 encampment without disavowing her beliefs about Israel, which she
14 could not do both as a matter of faith and as a matter of her ethnic
15 identity as a Jew.

16 299. On April 28, 2024, Shemuelian was again forced to confront the
17 encampment due to parking restrictions that prevented her from parking
18 near the law school.

19 300. Shemuelian had attempted to go to the law school to study for a
20 final exam that would take place on April 30, 2024. Because of the
21 parking restrictions, she was forced to park near the encampment and to
22 walk around the encampment to get to the law school.

23 301. Here, too, Shemuelian knew she could not simply cut through
24 the encampment, because to do so would require her to violate her faith
25 by disavowing Israel's right to exist.

26 302. So instead, Shemuelian was forced to walk around the
27 encampment, with antisemitic chants ringing in her ears and antisemitic
28 signs in her face.

1 303. This experience severely and negatively impacted Shemuelian's
2 ability to study for her final once she reached the law school library,
3 where she could still hear the chanting from the encampment.

4 304. Shemuelian was also forced to walk near the encampment to
5 attend one of her final exams.

6 305. Unlike other academic departments and programs, the law
7 school did not cancel or suspend in-person classes or exams due to the
8 encampment.

9 306. Unlike other programs, which were still in regular class session
10 during the lead up to and existence of the encampment, the law school
11 was scheduled to hold final exams from April 29, 2024, through May 9,
12 2024.

13 307. Shemuelian's ability to study for final exams was severely
14 compromised due to encampment activity. She was forced to walk near
15 the encampment to enter the law school, and her studies were routinely
16 drowned out by the antisemitic chants rising from the encampment.

17 308. The ongoing encampment caused the entire finals period to be
18 pervaded with a sense of fear for Shemuelian, and she felt that she and
19 all Jewish students were unsafe and subject to harm if they went
20 anywhere near the encampment.

21 309. Because of the law school's proximity to the encampment,
22 Shemuelian also feared activists would enter the law school building as
23 well.

24 310. The antisemitic activities taking place at the encampment
25 caused Shemuelian to feel immensely afraid as a Jewish student at the
26 thought of needing to cross by the encampment to attend her finals.

27 311. On May 1, 2024, Shemuelian raised these concerns to several
28 different law school deans, explaining she felt "unsafe" coming to the law

1 school for her final exam of the semester due to the encampment's Jew
2 Exclusion Zone and related protest activity on campus.

3 312. But, despite the previous assurances that such requests would
4 be accommodated, Shemuelian's request was denied, and her repeated
5 entreaties for reconsideration were ignored. In fact, Shemuelian did not
6 receive a response to her final plea that she not be subjected to the
7 "violence and harassment" she feared by being required to come to
8 campus for the exam.

9 313. Because the law school administration never responded to her
10 final request, Shemuelian had to go to campus in order to not miss her
11 final exam.

12 **I. Relief needed**

13 314. As set forth above, Defendants knowingly allowed activists to
14 establish a Jew Exclusion Zone on UCLA's campus for several days
15 during the spring quarter in 2024.

16 315. Defendants had the ability to disband the encampment, which
17 violated stated University policies, but instead chose to allow it to persist.

18 316. Defendants had the ability to order UCLA PD and private
19 security officers to help Jewish students obtain equal access to campus,
20 but did not and instead reinforced the exclusion zone.

21 317. Protest groups remain interested in reestablishing their
22 encampment in the near future, have publicly stated their desire to do
23 so, and have recently attempted to do so.

24 318. Plaintiffs have been harmed by Defendants' previous allowance
25 of the Jew Exclusion Zone on UCLA's campus and seek an order from this
26 Court to be able to continue their educational and professional pursuits
27 on campus in peace and freedom.

28 319. To know that they will be safe on campus, be free to exercise their

1 religion, and receive the equal protection of the laws, Plaintiffs need an
2 order requiring Defendants to ensure that no Jew Exclusion Zone will be
3 allowed on UCLA’s campus, both during the pendency of this case and
4 beyond.

5 **CLAIMS FOR RELIEF**

6 **Count I**

7 **42 U.S.C. § 1983**

8 **Equal Protection Clause**

9 320. Plaintiffs incorporate by reference the allegations set forth in the
10 preceding paragraphs.

11 321. Under the Fourteenth Amendment to the United States
12 Constitution, a State shall not “deny to any person within its jurisdiction
13 the equal protection of the laws.”

14 322. The Equal Protection Clause prohibits discrimination on the
15 basis of religion, race, and ethnicity.

16 323. Defendants have deprived Plaintiffs of equal protection of the
17 laws, as secured by the Fourteenth Amendment, through a policy and
18 practice that treats Plaintiffs differently than similarly situated
19 individuals because Plaintiffs are ethnically and religiously Jewish.

20 324. Defendants have knowingly allowed private individuals to bar
21 Jewish persons from parts of the UCLA campus because of their Jewish
22 ethnicity and religion, while non-Jewish persons are permitted access to
23 all areas of campus. Indeed, Defendants affirmatively assisted these
24 actions by hiring private security guards that reinforced the zone,
25 refusing to enforce stated policies that prohibited the zone, and
26 instructing law enforcement officers not to intervene.

27 325. Defendants furthered no legitimate or compelling state interest
28 by engaging in this conduct.

1 326. Defendants failed to tailor their actions narrowly to serve any
2 such interest.

3 327. As a result of Defendants' actions, Plaintiffs have been injured
4 by losing access to educational opportunities, losing access to library and
5 classroom facilities, losing in-person learning opportunities, losing the
6 ability to prepare for exams, being denied equal participation in the life
7 of the university, suffering emotional and physical stress that has
8 diverted time, attention, and focus from study, and by other harms.

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

14 329. Absent injunctive and declaratory relief against Defendants,
15 Plaintiffs will continue to be harmed by Defendants' actions.

16 **Count II**
17 **42 U.S.C. § 1983**
18 **Freedom of Speech**

19 330. Plaintiffs incorporate by reference the allegations set forth in the
20 preceding paragraphs.

21 331. "If there is any fixed star in our constitutional constellation, it is
22 that no official, high or petty, can prescribe what shall be orthodox in
23 politics, nationalism, religion, or other matters of opinion or force citizens
24 to confess by word or act their faith therein." *W. Va. State Bd. of Educ. v.*
25 *Barnette*, 319 U.S. 624, 642 (1943).

26 332. Government efforts to regulate speech based on the "specific
27 motivating ideology or the opinion or perspective of the speaker" is a
28 "blatant" and "egregious" form of impermissible speech restriction.

1 *Rosenberger v. Rector and Visitors of the Univ. of Va.*, 515 U.S. 819, 829
2 (1995).

3 333. And the government cannot “coerce an individual to speak
4 contrary to her beliefs on a significant issue of personal conviction, all in
5 order to eliminate ideas that differ from its own.” *303 Creative v. Elenis*,
6 600 U.S. 570, 598 (2023).

7 334. Plaintiffs believe that Israel has the right to exist and maintain
8 a Jewish state in the Jewish ancestral homeland.

9 335. Plaintiffs were prohibited from accessing areas of the UCLA
10 campus because they expressed this viewpoint and refused to disavow
11 Israel.

12 336. By failing to guarantee Plaintiffs access to campus and campus
13 resources, and affirmatively aiding the denial of such access, on the same
14 terms as others based on their viewpoint, Defendants engaged in
15 viewpoint discrimination against Plaintiffs.

16 337. Moreover, by coercing Plaintiffs to confess a belief with which
17 they disagree, Defendants compelled them to speak in violation of the
18 First Amendment of the United States Constitution.

19 338. Defendants furthered no legitimate or compelling state interest
20 by engaging in this conduct.

21 339. Defendants failed to tailor their actions narrowly to serve any
22 such interest.

23 340. As a result of Defendants’ actions, Plaintiffs have been injured
24 by losing access to educational opportunities, losing access to library and
25 classroom facilities, losing in-person learning opportunities, losing the
26 ability to prepare for exams, being denied equal participation in the life
27 of the university, suffering emotional and physical stress that has
28 diverted time, attention, and focus from study, and by other harms.

1 341. As a direct and proximate result of Defendants’ actions, Plaintiffs
2 have suffered harm in the form of both general and special damages in
3 an amount to be determined at trial, including but not limited to
4 compensatory damages, punitive damages, and pre-judgment and post-
5 judgment interest.

6 342. Absent injunctive and declaratory relief against Defendants,
7 Plaintiffs will continue to be harmed by Defendants’ actions.

8 **Count III**
9 **42 U.S.C. § 1983**
10 **Free Exercise Clause – Status Discrimination**

11 343. Plaintiffs incorporate by reference the allegations set forth in the
12 preceding paragraphs.

13 344. The Free Exercise Clause “protect[s] religious observers against
14 unequal treatment” “based on their ‘religious status.’” *Trinity Lutheran*
15 *Church of Columbia, Inc. v. Comer*, 582 U.S. 449, 458 (2017) (quoting
16 *Church of the Lukumi Babalu Aye, Inc. v. City of Hialeah*, 508 U.S. 520,
17 533 (1993)).

18 345. Defendants deprived Plaintiffs of the free exercise of religion, as
19 secured by the First Amendment, through policies and practices that
20 subjected Plaintiffs to unequal treatment based on their religious status.

21 346. Defendants furthered no legitimate or compelling state interest
22 by engaging in this conduct.

23 347. Defendants failed to tailor their actions narrowly to serve any
24 such interest.

25 348. As a result of Defendants’ actions, Plaintiffs have been injured
26 by losing access to educational opportunities, losing access to library and
27 classroom facilities, losing in-person learning opportunities, losing the
28 ability to prepare for exams, being denied equal participation in the life

1 of the university, suffering emotional and physical stress that has
2 diverted time, attention, and focus from study, and by other harms.

3 349. As a direct and proximate result of Defendants' actions, Plaintiffs
4 have suffered harm in the form of both general and special damages in
5 an amount to be determined at trial, including but not limited to
6 compensatory damages, punitive damages, and pre-judgment and post-
7 judgment interest.

8 350. Absent injunctive and declaratory relief against Defendants,
9 Plaintiffs will continue to be harmed by Defendants' actions.

10 **Count IV**

11 **42 U.S.C. § 1983**

12 **Free Exercise Clause – Not Generally Applicable**

13 351. Plaintiffs incorporate by reference the allegations set forth in the
14 preceding paragraphs.

15 352. The First Amendment provides that “Congress shall make no law
16 respecting an establishment of religion, or prohibiting the free exercise
17 thereof.” U.S. Const. amend. I.

18 353. Under the Free Exercise Clause, a government action that
19 burdens religious exercise triggers strict scrutiny when it is not neutral
20 or generally applicable. *Fellowship of Christian Athletes v. San Jose*
21 *Unified Sch. Dist. Bd. of Educ.*, 82 F.4th 664, 685 (9th Cir. 2023) (en
22 banc).

23 354. A policy is not generally applicable if it treats “any comparable
24 secular activity more favorably than religious exercise.” *Tandon v.*
25 *Newsom*, 593 U.S. 61, 62 (2021) (per curiam).

26 355. Defendants treated Plaintiffs' religious exercises, including
27 wearing Jewish symbols and expressing support for Israel, less favorably
28 than comparable secular activities.

1 356. Defendants furthered no legitimate or compelling state interest
2 by engaging in this conduct.

3 357. Defendants failed to tailor their actions narrowly to serve any
4 such interest.

5 358. As a result of Defendants' actions, Plaintiffs have been injured
6 by losing access to educational opportunities, losing access to library and
7 classroom facilities, losing in-person learning opportunities, losing the
8 ability to prepare for exams, being denied equal participation in the life
9 of the university, suffering emotional and physical stress that has
10 diverted time, attention, and focus from study, and by other harms.

11 359. As a direct and proximate result of Defendants' actions, Plaintiffs
12 have suffered harm in the form of both general and special damages in
13 an amount to be determined at trial, including but not limited to
14 compensatory damages, punitive damages, and pre-judgment and post-
15 judgment interest.

16 360. Absent injunctive and declaratory relief against Defendants,
17 Plaintiffs will continue to be harmed by Defendants' actions.

18 **Count V**
19 **42 U.S.C. § 1983**
20 **Free Exercise Clause – Religious Targeting**

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

23 362. A law or policy “targeting religious beliefs as such is never
24 permissible.” *Lukumi*, 508 U.S. at 533.

25 363. Defendants targeted Plaintiffs' Jewish religious beliefs and
26 practices for special disfavor in violation of the Free Exercise Clause.

27 364. As a result of Defendants' actions, Plaintiffs have been injured
28 by losing access to educational opportunities, losing access to library and

1 classroom facilities, losing in-person learning opportunities, losing the
2 ability to prepare for exams, being denied equal participation in the life
3 of the university, suffering emotional and physical stress that has
4 diverted time, attention, and focus from study, and by other harms.

5 365. As a direct and proximate result of Defendants’ actions, Plaintiffs
6 have suffered harm in the form of both general and special damages in
7 an amount to be determined at trial, including but not limited to
8 compensatory damages, punitive damages, and pre-judgment and post-
9 judgment interest.

10 366. Absent injunctive and declaratory relief against Defendants,
11 Plaintiffs will continue to be harmed by Defendants’ actions.

12 **Count VI**
13 **42 U.S.C. § 2000d et. seq.**
14 **Title VI of the Civil Rights Act of 1964**

15 367. Plaintiffs incorporate by reference the allegations set forth in the
16 preceding paragraphs.

17 368. Title VI provides that “[n]o person in the United States shall, on
18 the ground of race, color, or national origin, be excluded from
19 participation in, be denied the benefits of, or be subjected to
20 discrimination under any program or activity receiving Federal financial
21 assistance.” 42 U.S.C. § 2000d.

22 369. UCLA receives financial assistance from the United States
23 Department of Education and is therefore subject to suit under Title VI
24 of the Civil Rights Act of 1964.

25 370. Discrimination against Jews—including based on actual or
26 perceived ancestry, race, ethnic characteristics, or national origin—is
27 prohibited under Title VI. *Cf. Shaare Tefila*, 481 U.S. at 616
28

1 (discrimination against Jews is discrimination based on race); *see also* 34
2 C.F.R. § 100.3(b)(1)(iv), (vi).

3 371. Defendants excluded Plaintiffs from participation in UCLA
4 programs, denied Plaintiffs the full benefits of UCLA programs, and
5 subjected Plaintiffs to discrimination, all in violation of Title VI.

6 372. As a result of Defendants' actions, Plaintiffs have been injured
7 by losing access to educational opportunities, losing access to library and
8 classroom facilities, losing in-person learning opportunities, losing the
9 ability to prepare for exams, being denied equal participation in the life
10 of the university, suffering emotional and physical stress that has
11 diverted time, attention, and focus from study, and by other harms.

12 373. As a direct and proximate result of Defendants' actions, Plaintiffs
13 have suffered harm in the form of both general and special damages in
14 an amount to be determined at trial, including but not limited to
15 compensatory damages, punitive damages, and pre-judgment and post-
16 judgment interest.

17 374. Absent injunctive and declaratory relief against Defendants,
18 Plaintiffs will continue to be harmed by Defendants' actions.

19 **Count VII**
20 **42 U.S.C. § 1985**
21 **Conspiracy to Interfere with Civil Rights**

22 375. Plaintiffs incorporate by reference the allegations set forth in the
23 preceding paragraphs.

24 376. Section 1985 of the Ku Klux Klan Act provides that “[i]f two or
25 more persons in any State or Territory conspire or go in disguise on the
26 highway or on the premises of another, for the purpose of depriving,
27 either directly or indirectly, any person or class of persons of the equal
28 protection of the laws, or of equal privileges and immunities under the

1 laws ... the party so injured or deprived may have an action for the
2 recovery of damages occasioned by such injury or deprivation, against
3 any one or more of the conspirators.” 42 U.S.C. § 1985(3).

4 377. Defendants conspired both among themselves and with the
5 others for the purpose of depriving Plaintiffs of their constitutional rights
6 and equal protection under the law, specifically access to all parts of the
7 UCLA campus equal to the access enjoyed by others.

8 378. As a result of Defendants’ actions, Plaintiffs have been injured
9 by losing access to educational opportunities, losing access to library and
10 classroom facilities, losing in-person learning opportunities, losing the
11 ability to prepare for exams, being denied equal participation in the life
12 of the university, suffering emotional and physical stress that has
13 diverted time, attention, and focus from study, and by other harms.

14 379. As a direct and proximate result of Defendants’ actions, Plaintiffs
15 have suffered harm in the form of both general and special damages in
16 an amount to be determined at trial, including but not limited to
17 compensatory damages, punitive damages, and pre-judgment and post-
18 judgment interest.

19 380. Absent injunctive and declaratory relief against Defendants,
20 Plaintiffs will continue to be harmed by Defendants’ actions.

21 **Count VIII**
22 **42 U.S.C. § 1986**
23 **Failure to Prevent Conspiracy**

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

26 382. Section 1986 of the Ku Klux Klan Act provides “[e]very person
27 who, having knowledge that any of the wrongs conspired to be done, and
28 mentioned in section 1985 ... , are about to be committed, and having

1 power to prevent or aid in preventing the commission of the same,
2 neglects or refuses so to do, if such wrongful act be committed, shall be
3 liable to the party injured, or his legal representatives, for all damages
4 caused by such wrongful act, which such person by reasonable diligence
5 could have prevented.” 42 U.S.C. § 1986.

6 383. Section 1986 is, in other words, “derivative of § 1985 violations”
7 and holds liable anyone who “knew of a § 1985 conspiracy and, having
8 the power to prevent or aid in preventing the implementation of the
9 conspiracy, neglected to do so.” *Park v. City of Atlanta*, 120 F.3d 1157,
10 1160 (11th Cir. 1997). The statute does not require the individual to have
11 “participated in the conspiracy or shared in the discriminatory animus
12 with members of the conspiracy.” *Id.*

13 384. Defendants knew of a conspiracy to deprive Plaintiffs of their
14 civil rights.

15 385. Although Defendants had the power to prevent or aid in
16 preventing the implementation of the conspiracy, Defendants neglected
17 to do so in violation of Section 1986.

18 386. As a result of Defendants’ actions, Plaintiffs have been injured
19 by losing access to educational opportunities, losing access to library and
20 classroom facilities, losing in-person learning opportunities, losing the
21 ability to prepare for exams, being denied equal participation in the life
22 of the university, suffering emotional and physical stress that has
23 diverted time, attention, and focus from study, and by other harms.

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

1 388. Absent injunctive and declaratory relief against Defendants,
2 Plaintiffs will continue to be harmed by Defendants' actions.

3 **Count IX**
4 **California Constitution Art. I, § 7(a)**
5 **Equal Protection Clause**

6 389. Plaintiffs incorporate by reference the allegations set forth in the
7 preceding paragraphs.

8 390. Under California's Equal Protection Clause, "[a] person may not
9 be ... denied equal protection of the laws." Cal. Const. art. 1, § 7(a). The
10 Clause prohibits discrimination based on race, ethnicity, and religion.

11 391. Defendants have deprived Plaintiffs of equal protection of the
12 laws, as secured by the California Constitution, through policies and
13 practices that treat Plaintiffs differently than similarly situated
14 individuals because Plaintiffs are Jewish.

15 392. Defendants furthered no legitimate or compelling state interest
16 by engaging in this conduct.

17 393. Defendants failed to tailor their actions narrowly to serve any
18 such interest.

19 394. As a result of Defendants' actions, Plaintiffs have been injured
20 by losing access to educational opportunities, losing access to library and
21 classroom facilities, losing in-person learning opportunities, losing the
22 ability to prepare for exams, being denied equal participation in the life
23 of the university, suffering emotional and physical stress that has
24 diverted time, attention, and focus from study, and by other harms.

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

1 compensatory damages, punitive damages, and pre-judgment and post-
2 judgment interest.

3 396. Absent injunctive and declaratory relief against Defendants,
4 Plaintiffs will continue to be harmed by Defendants' actions.

5 **Count X**
6 **California Constitution Art. I, § 4**
7 **Free Exercise Clause**

8 397. Plaintiffs incorporate by reference the allegations set forth in the
9 preceding paragraphs.

10 398. The California Constitution guarantees "[f]ree exercise and
11 enjoyment of religion without discrimination or preference." Cal. Const.
12 art. I, § 4.

13 399. Defendants have deprived Plaintiffs of the free exercise and
14 enjoyment of religion without discrimination or preference, as secured by
15 the California Constitution, through a policy and practice that treats
16 Plaintiffs differently than similarly situated non-Jewish individuals
17 because Plaintiffs are Jewish.

18 400. Defendants furthered no legitimate or compelling state interest
19 by engaging in this conduct.

20 401. Defendants failed to tailor their actions narrowly to serve any
21 such interest.

22 402. As a result of Defendants' actions, Plaintiffs have been injured
23 by losing access to educational opportunities, losing access to library and
24 classroom facilities, losing in-person learning opportunities, losing the
25 ability to prepare for exams, being denied equal participation in the life
26 of the university, suffering emotional and physical stress that has
27 diverted time, attention, and focus from study, and by other harms.

28 403. As a direct and proximate result of Defendants' actions, Plaintiffs

1 have suffered harm in the form of both general and special damages in
2 an amount to be determined at trial, including but not limited to
3 compensatory damages, punitive damages, and pre-judgment and post-
4 judgment interest.

5 404. Absent injunctive and declaratory relief against Defendants,
6 Plaintiffs will continue to be harmed by Defendants' actions.

7 **Count XI**
8 **Cal. Educ. Code § 220**
9 **Prohibition of Discrimination**

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

12 406. Section 220 of the California Education Code provides that “[n]o
13 person shall be subjected to discrimination on the basis of ... race or
14 ethnicity ... in any program or activity conducted by an educational
15 institution that receives, or benefits from, state financial assistance, or
16 enrolls pupils who receive state student financial aid.” Cal. Educ. Code
17 § 220.

18 407. UCLA both receives state financial assistance and enrolls pupils
19 who receive state student financial aid and is therefore subject to suit
20 under Section 220.

21 408. Section 220—as part of its prohibition of race discrimination—
22 prohibits discrimination against Jews. *See* Cal. Educ. Code § 201(g) (“It
23 is the intent of the Legislature that this chapter shall be interpreted as
24 consistent with ... Title VI of the federal Civil Rights Act of 1964 ...”);
25 *Shaare Tefila*, 481 U.S. at 616 (discrimination against Jews is
26 discrimination based on race).

1 409. Defendants subjected Plaintiffs to discrimination on the basis of
2 Plaintiffs' race or ethnicity in violation of California Education Code
3 § 220.

4 410. Defendants furthered no legitimate or compelling state interest
5 by engaging in this conduct.

6 411. Defendants failed to tailor their actions narrowly to serve any
7 such interest.

8 412. As a result of Defendants' actions, Plaintiffs have been injured
9 by losing access to educational opportunities, losing access to library and
10 classroom facilities, losing in-person learning opportunities, losing the
11 ability to prepare for exams, being denied equal participation in the life
12 of the university, suffering emotional and physical stress that has
13 diverted time, attention, and focus from study, and by other harms.

14 413. As a direct and proximate result of Defendants' actions, Plaintiffs
15 have suffered harm in the form of both general and special damages in
16 an amount to be determined at trial, including but not limited to
17 compensatory damages, punitive damages, and pre-judgment and post-
18 judgment interest.

19 414. Absent injunctive and declaratory relief against Defendants,
20 Plaintiffs will continue to be harmed by Defendants' actions.

21 **Count XII**
22 **Cal. Civil Code § 51.7**
23 **Ralph Civil Rights Act of 1976**

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

26 416. The Ralph Civil Rights Act of 1976 provides that "[a]ll persons
27 within the jurisdiction of this state have the right to be free from any
28 violence, or intimidation by threat of violence, committed against their

1 persons or property because of” race or ethnicity. Cal. Civ. Code
2 § 51.7(b)(1).

3 417. Defendants allowed activists to harass, threaten, and assault
4 Plaintiffs because of their Jewish identity in violation of the Ralph Civil
5 Rights Act.

6 418. Defendants furthered no legitimate or compelling state interest
7 by engaging in this conduct.

8 419. Defendants failed to tailor their actions narrowly to serve any
9 such interest.

10 420. As a result of Defendants’ actions, Plaintiffs have been injured
11 by losing access to educational opportunities, losing access to library and
12 classroom facilities, losing in-person learning opportunities, losing the
13 ability to prepare for exams, being denied equal participation in the life
14 of the university, suffering emotional and physical stress that has
15 diverted time, attention, and focus from study, and by other harms.

16 421. As a direct and proximate result of Defendants’ actions, Plaintiffs
17 have suffered harm in the form of both general and special damages in
18 an amount to be determined at trial, including but not limited to
19 compensatory damages, punitive damages, and pre-judgment and post-
20 judgment interest.

21 422. Absent injunctive and declaratory relief against Defendants,
22 Plaintiffs will continue to be harmed by Defendants’ actions.

23 **Count XIII**
24 **Cal. Civil Code § 52.1**
25 **Tom Bane Civil Rights Act**

26 423. Plaintiffs incorporate by reference the allegations set forth in the
27 preceding paragraphs.

28 424. The Tom Bane Civil Rights Act provides a right of action against

1 any “person or persons, whether or not acting under color of law, [who]
2 interferes by threat, intimidation, or coercion, or attempts to interfere by
3 threat, intimidation, or coercion, with the exercise or enjoyment by any
4 individual or individuals of rights secured by the Constitution or laws of
5 the United States, or of the rights secured by the Constitution or laws of
6 [California].” Cal. Civil Code § 52.1(b).

7 425. Defendants interfered by threat, intimidation, or coercion, with
8 Plaintiffs’ exercise or enjoyment of rights secured by the Constitution or
9 laws of the United States and rights secured by the Constitution or laws
10 of California.

11 426. Defendants furthered no legitimate or compelling state interest
12 by engaging in this conduct.

13 427. Defendants failed to tailor their actions narrowly to serve any
14 such interest.

15 428. As a result of Defendants’ actions, Plaintiffs have been injured
16 by losing access to educational opportunities, losing access to library and
17 classroom facilities, losing in-person learning opportunities, losing the
18 ability to prepare for exams, being denied equal participation in the life
19 of the university, suffering emotional and physical stress that has
20 diverted time, attention, and focus from study, and by other harms.

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

26 430. Absent injunctive and declaratory relief against Defendants,
27 Plaintiffs will continue to be harmed by Defendants’ actions.

28

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3 **PRAYER FOR RELIEF**

4 Wherefore, Plaintiffs respectfully request that the Court:

- 5 a. Declare that Defendants have violated the First and
6 Fourteenth Amendments to the United States Constitution,
7 Title VI of the Civil Rights Act of 1964, Sections 1983, 1985,
8 and 1986 of the Ku Klux Klan Act, the California Constitution,
9 the California Education Code, the Ralph Civil Rights Act of
10 1976, and the Tom Bane Civil Rights Act;
11 b. Issue preliminary and permanent injunctive relief prohibiting
12 Defendants' unequal treatment of Plaintiffs in violation of
13 Plaintiffs' constitutional and statutory rights;
14 c. Award Plaintiffs compensatory, punitive, and nominal
15 damages for the loss of their rights under federal and state
16 law;
17 d. Award Plaintiffs the costs of this action and reasonable
18 attorneys' fees; and
19 e. Award such other and further relief as the Court deems
20 equitable and just.

21 **JURY DEMAND**

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