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 20 **UNITED STATES DISTRICT COURT**  
**FOR THE CENTRAL DISTRICT OF CALIFORNIA**  
 21 **WESTERN DIVISION**

22 UNITED STATES OF AMERICA

23 *Plaintiff,*

24 v.

25 REGENTS OF THE UNIVERSITY OF  
 26 CALIFORNIA,

27 *Defendant.*

Case No. 2:26-cv-05589

**COMPLAINT**

## INTRODUCTION

1  
2 On April 25, 2024, following months of antisemitic and anti-Israeli demonstrations,  
3 masked and armed agitators, many of whom were openly hostile to Jews and Israelis,  
4 occupied the heart of the University of California, Los Angeles (“UCLA”) campus. They  
5 built an illegal encampment, surrounded it with barriers, and formed “human phalanxes”  
6 to block Jews and Israelis from entering academic buildings.<sup>1</sup> They kicked and slapped  
7 Jews, beat Jews with sticks, and assaulted Jews with pepper spray.<sup>2</sup> One Jewish student  
8 was knocked unconscious and was taken to the hospital with an open head wound.<sup>3</sup>

9 Although UCLA knew that its Jewish and Israeli students risked physical assault  
10 when attempting to go to class or the library, UCLA inexplicably *took no serious action*  
11 *whatsoever* until May 2, 2024, when it finally allowed police to clear the encampment.  
12 Chaos ensued. Law-enforcement officers “were met with bursts of pepper spray,  
13 protesters wielding fire extinguishers against them, bright strobe lights, and protesters  
14 wearing helmets and goggles.”<sup>4</sup>

15 UCLA’s own Task Force to Combat Antisemitism and Anti-Israeli Bias (“Task  
16 Force”), published a damning report (Ex. A) concluding that UCLA’s “leadership allowed  
17 the encampment and related denial of campus access to continue” and “officials continued  
18 to refuse to break up the encampment even after the protesters denied Jews and others free  
19 passage and access to campus classrooms and facilities.”<sup>5</sup> UCLA’s leadership apparently  
20 preferred a do-nothing “de-escalation strategy” to protecting their Jewish and Israeli  
21 students from an angry mob organized by peers armed with tasers, lumber, and a sword.<sup>6</sup>

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22 <sup>1</sup> The Task Force to Combat Antisemitism and Anti-Israeli Bias at UCLA, *Antisemitism*  
23 *and Anti-Israeli Bias at UCLA*, 53 (2024) <https://tinyurl.com/4f3vajww> (Ex. A).

24 <sup>2</sup> *Id.* at 35; 57-58.

25 <sup>3</sup> *Id.* at 58.

26 <sup>4</sup> *Id.* at 59.

27 <sup>5</sup> *Id.* at 60.

28 <sup>6</sup> *Id.* at 58, 60.

1 This Court already has found that UCLA’s non-response to the horror inflicted on  
2 Jewish and Israeli students was “unimaginable” and “abhorrent.”<sup>7</sup> It correctly held that  
3 UCLA likely violated the First Amendment’s Free Exercise Clause by excluding Jews  
4 from campus buildings, thoroughfares, and resources.<sup>8</sup>

5 UCLA’s decision to ignore the harassment of, and discrimination against, Jewish  
6 and Israeli students also violates Title VI of the Civil Rights Act of 1964, which prohibits  
7 race and national-origin discrimination in higher education.<sup>9</sup> UCLA’s top administrators  
8 knew that armed demonstrators beat up Jews and physically prevented Jewish and Israeli  
9 students from attending class. The Office of Equity, Diversity & Inclusion (“EDI office”)  
10 received over one hundred complaints about antisemitism and anti-Israeli hostility but  
11 routinely ignored these complaints. In short, UCLA was deliberately indifferent to the  
12 suffering of its Jewish and Israeli students and declined to take meaningful action to  
13 protect them. Its behavior exemplifies the deliberate indifference towards discrimination  
14 that Title VI prohibits.

15 UCLA failed to protect its Jewish and Israeli students. The United States brings  
16 this action to compel UCLA to comply with Title VI, to recover the taxpayer subsidies the  
17 United States awarded to this discriminatory institution, and to require UCLA to reform  
18 its antidiscrimination procedures to ensure that all complaints of discrimination against  
19 and harassment of Jewish and Israeli students are properly investigated and addressed.

## 20 PARTIES

21 1. Plaintiff is the United States of America (the “United States”).

22 2. Defendant Regents of the University of California is a state agency that  
23 operates the ten state universities within the University of California System. Under  
24 Article IX, § 9 of the California Constitution, Defendant has the “full powers of

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26 <sup>7</sup> *Frankel v. Regents of Univ. of Cal.*, 744 F. Supp. 3d 1015, 1020 (C.D. Cal. 2024).

27 <sup>8</sup> *Id.* at 1026.

28 <sup>9</sup> 42 U.S.C. § 2000d.

1 organization and government” over the System, including UCLA. Cal. Const. art. IX, §  
2 9(a). Defendants’ principal place of operation is Oakland, California.

### 3 JURISDICTION AND VENUE

4 3. This Court has subject matter jurisdiction over this action under 28 U.S.C.  
5 §§ 1331 and 1345.

6 4. This Court has the authority to enter a declaratory judgment and to provide  
7 injunctive relief pursuant to Rules 57 and 65 of the Federal Rules of Civil Procedure and  
8 28 U.S.C. §§ 2201 and 2202.

9 5. Venue is proper pursuant to 28 U.S.C. § 1391(b). UCLA is located in the  
10 Central District of California, and a substantial portion of the events and omissions giving  
11 rise to the United States’ claims occurred in this district.

12 6. Title VI states that “[n]o person in the United States shall, on the ground of  
13 race, color, or national origin, be excluded from participation in, be denied the benefits of,  
14 or be subjected to discrimination under any program or activity receiving Federal financial  
15 assistance.”<sup>10</sup> If the Attorney General of the United States determines that compliance  
16 with Title VI by a recipient of federal financial assistance cannot be secured by voluntary  
17 means, the United States is authorized to compel compliance through judicial  
18 enforcement.<sup>11</sup>

19 7. UCLA is a recipient of federal financial assistance from several federal  
20 agencies, including the Department of Justice.

21 8. On May 9, 2025, the United States provided Defendant with written notice  
22 that the Department of Justice had opened an investigation into the UC System’s response  
23 to incidents of antisemitic discrimination, harassment, abuse, and retaliation against  
24 students that occurred within the educational environment of the UC System, including  
25 UCLA, under Title VI.

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27 <sup>10</sup> 42 U.S.C. § 2000d.

28 <sup>11</sup> 42 U.S.C. § 2000d-1; *see also* 28 C.F.R. § 42.108(a)-(d).

1 9. On July 29, 2025, the Department of Justice provided Defendant with written  
2 notice (Ex. B) of its investigatory finding that UCLA’s response to incidents of antisemitic  
3 discrimination, harassment, abuse, and retaliation against University students violated its  
4 legal obligations under Title VI.<sup>12</sup>

5 10. After providing Defendant with written notice of its findings, the Department  
6 of Justice met and conferred with UCLA to attempt to secure UCLA’s compliance with  
7 Title VI by voluntary means. The Department of Justice has determined that Defendant’s  
8 compliance with Title VI cannot be secured by voluntary means.

9 **STATEMENT OF FACTS**

10 **A. Jewish and Israeli Students Were the Victims of Systemic Discrimination**  
11 **and Violence at UCLA.**

12 11. On October 7, 2023, the designated foreign terrorist organization Hamas  
13 invaded the State of Israel and massacred approximately 1,200 people, including 46  
14 Americans. Hamas took 254 hostages, including twelve Americans.<sup>13</sup> Most of Hamas’s  
15 victims were unarmed civilians. Hamas terrorists raped both men and women and cut  
16 open a woman’s womb and stabbed her unborn baby. Some victims were decapitated.<sup>14</sup>  
17 The October 7 terrorist attacks were the deadliest day for the Jewish people since the  
18 Holocaust.

19 12. The October 7 terrorist attack triggered a wave of antisemitism and anti-  
20 Israeli sentiment across American college campuses, including at UCLA.

21 13. Although elected officials across the United States and the world strongly  
22 condemned Hamas’ October 7 attack, many students and faculty at UCLA celebrated it.

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24 <sup>12</sup> 28 C.F.R. § 42.108(d); see Letter from Assistant Attorney General Harmeet K. Dhillon  
25 to Michael V. Drake (July 29, 2025), <https://tinyurl.com/bdu5p2nm> (Ex. B).

26 <sup>13</sup> Secretary of State Marco Rubio, *Two-Year Anniversary of October 7th Attack* (Oct. 7,  
27 2025), <https://tinyurl.com/4yxzmv55>.

28 <sup>14</sup> Lucy Williamson, *Israel Gaza: Hamas raped and mutilated women on 7 October*, *BBC*  
*hears*, BBC (Dec. 5, 2023), <https://tinyurl.com/5y642jza>.

1 14. On October 9, 2023, the Undergraduate Student Association Council Cultural  
2 Affairs Commissioner issued an official statement: “Thus, we honor the Palestinians on  
3 the frontlines taking their land and sovereignty back! From the River to The Sea, Palestine  
4 Will Be Free.”<sup>15</sup>

5 15. On October 16, 2023, the University of California Ethnic Studies Faculty  
6 Council, which represents faculty at UCLA and across the University of California system,  
7 demanded that leadership “uplift the Palestinian freedom struggle[.]”<sup>16</sup>

8 16. Some protestors at UCLA “blamed Israel for the October 7, 2023, attacks or  
9 suggested that the attacks, rapes, and mass murders did not happen.”<sup>17</sup>

10 17. On October 12, 2023, only five days after the October 7 attack, National  
11 Students for Justice in Palestine (“SJP”) called for a nationwide “Day of Resistance.”<sup>18</sup>  
12 At that time, the UCLA chapter of SJP was a registered student organization. Hundreds  
13 of protesters used amplified sound in violation of UCLA rules and wore masks and face  
14 coverings to conceal their identities, also in violation of UCLA rules.<sup>19</sup>

15 18. On November 8, 2023, UCLA Divest and UCLA’s SJP organized a rally  
16 inside Bunche Hall, disrupting classes and research. At one point, while marchers were  
17 beating a piñata of Israeli Prime Minister Benjamin Netanyahu, at least one demonstrator  
18 chanted “beat the f\*\*\*king Jew!”<sup>20</sup>

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21 <sup>15</sup> Ex. A at 47.

22 <sup>16</sup> UC Ethnic Studies Faculty Council, *Statement on bias in UC statements* (Oct. 16, 2023),  
23 <https://tinyurl.com/2xw34jyb>.

24 <sup>17</sup> Ex. A at 48.

25 <sup>18</sup> National SJP (@nationalsjp), Instagram (Oct. 12, 2023), <https://tinyurl.com/3k9acc3j>.

26 <sup>19</sup> Aaron Bandler, *Roundup of SJP Chapters “Day of Resistance” Protests*, Jewish  
27 Journal (Oct. 18, 2023), <https://tinyurl.com/6scj98pj>; UCLA Policy 850 § IV(A)(4) &  
28 (19), <https://tinyurl.com/3yybn3sn>.

<sup>20</sup> Ex. A at 49.

1 19. In October and November 2023, masked protesters, including some  
 2 reportedly wielding large knives, tore down posters of Israeli hostages that had been placed  
 3 on campus bulletin boards with appropriate permissions.<sup>21</sup>



18 20. Indeed, antisemitic students (and often faculty) at UCLA participated in  
 19 marches and rallies that “almost always took place without a permit and ... violated  
 20 University and campus time, place, and manner rules.”<sup>22</sup> The “marches usually featured”  
 21 chants such as “kill the Jews” and “Intifada.”<sup>23</sup> “During many of these marches and rallies,  
 22 University affiliates and non-affiliates wore masks, often fashioned as keffiyehs covering

23 <sup>21</sup> *Id.* at 35, 64.

24 <sup>22</sup> *Id.* at 45.

25 <sup>23</sup> *Id.* at 46. The word “intifada” refers to Palestinian acts of terrorism against Jews and  
 26 Israel and is often interpreted as endorsing violence against Jews and Jewish institutions.  
 27 *See, e.g.,* American Jewish Committee, *What Does “Globalize the Intifada” Mean and*  
 28 *How Can it Lead to Targeting Jews with Violence?* (Dec. 18, 2025),  
<https://tinyurl.com/2e9wv294>.

1 their faces or surgical masks, with the intent of hiding their identities in violation of  
2 University and campus rules.”<sup>24</sup>

3 21. According to a Jewish professor, in the fall of 2023, hundreds of people at  
4 one protest chanted “Itbah El Yahud” (Arabic for “slaughter the Jews”).<sup>25</sup>

5 22. During the 2023 to 2024 academic year, signs, graffiti, and chants with  
6 antisemitic messages such as “die you fucking Jew” and “FUCK ALL Jews” as well as  
7 multiple displays of Nazi swastikas were found throughout UCLA’s campus, including  
8 one swastika carved into a tree.<sup>26</sup> A Jewish star was also drawn on the ground with the  
9 words “STEP HERE” written on it.<sup>27</sup>

10 23. During the winter quarter in 2024, students constructed a statue “of a pig  
11 featuring a clock with the words ‘Time is Running Out,’ a bag with a dollar sign, a Jewish  
12 star, and flames around the words ‘UC Regents.’” Although the sculpture blocked a  
13 sidewalk in violation of UCLA’s time, place, and manner rules, UCLA took no action.<sup>28</sup>

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23 <sup>24</sup> Ex. A at 50.

24 <sup>25</sup> Inna Faliks, *UCLA Response to Antisemitism Hits a Sour Note*, Jewish Journal (Nov.  
25 22, 2023), <https://tinyurl.com/evyw5nb3>

26 <sup>26</sup> Ex. A at 27, 31, 34-35, 40, 63.

27 <sup>27</sup> *Id.* at 63.

28 <sup>28</sup> Ex. A at 29.



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13       24. On April 25, 2024, antisemitic and anti-Israeli students erected an  
14 encampment and occupied Royce Quad, one of the busiest and most important areas on  
15 UCLA’s campus. The encampment was organized by UC Divest, a group of official  
16 student organizations including SJP.<sup>29</sup>

17       25. The occupiers promptly fortified the encampment. They “built a barrier  
18 around it, fashioned with sheets of plywood, some of which were affixed to metal bicycle  
19 racks.”<sup>30</sup>

20       26. The illegal encampment took up nearly the entirety of Royce Quad, making  
21 passage impracticable and often impossible for anyone the occupiers sought to exclude.<sup>31</sup>  
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26 <sup>29</sup> *Id.* at 50-51.

27 <sup>30</sup> *Id.* at 52.

28 <sup>31</sup> Image source: UCLA Alumni, *Campus Protests*, <https://tinyurl.com/3j6u7hxp>.



12 27. The occupiers barricaded the doors of Royce Hall and Powell Library with  
13 garbage cans, tents, ropes, and bicycle racks. They vandalized the buildings with spray-  
14 painted graffiti, including “FUCK ISRAEL.”<sup>32</sup>



26 <sup>32</sup> Image source: David Ganezer, *UCLA’s Royce Hall Left Covered in Filth and Graffiti,*  
27 *After Police Remove Pro-Hamas Protestors From Their Encampment,* Santa Monica  
28 *Observer* (May 6, 2024), <https://tinyurl.com/57a5ecap>.

1 28. Although the occupiers frequently claimed they were not antisemitic, their  
 2 actions demonstrated otherwise. One building was defaced with graffiti reading, “FUCK  
 3 ALL Jews.”<sup>33</sup> One tent displayed a sign reading, “israelis Are Native 2 HELL.”<sup>34</sup>



13 29. UCLA’s official advice to students who needed to access Royce Quad and  
 14 adjacent buildings was simply to “avoid the area if they wish.”<sup>35</sup> On April 26, 2024, Vice  
 15 Chancellor for UCLA Strategic Communications Mary Osako boasted that UCLA had  
 16 “taken several steps to help ensure people on campus know about the demonstration.”<sup>36</sup>

17 30. Vice Chancellor Osako added that “UCLA’s approach to the encampment is  
 18 guided by several equally important principles,” including “the need to support the free  
 19 expression rights of our community.”<sup>37</sup> In other words, UCLA viewed the encampment,  
 20 despite its brazen violations of UCLA rules, as “free expression.”

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23 <sup>33</sup> Ex. A at 31.

24 <sup>34</sup> *Id.* at 39.

25 <sup>35</sup> UCLA Newsroom, *UCLA statement about encampment on campus* (April 26, 2024),  
<https://tinyurl.com/4d3crz4x>.

26 <sup>36</sup> UCLA Newsroom, *UCLA statement on demonstrations*, (April 28, 2024)  
<https://tinyurl.com/3cyra9mn> (“UCLA Statement on Demonstrations”).

27 <sup>37</sup> *Id.*

1 31. UCLA took no meaningful steps to enforce its own rules or to help ensure  
2 people on campus could access academic buildings despite the “demonstration.”<sup>38</sup> On the  
3 contrary, it accommodated the occupiers by turning off the sprinklers on Royce Quad.

4 32. A campuswide “Bruin Alert” described the encampment as “mostly  
5 peaceful.”<sup>39</sup>

6 33. In an April 28, 2024, statement, Vice Chancellor Osako claimed that UCLA  
7 was “heartbroken about the violence” at the encampment. She previously indicated that  
8 “University of California systemwide policy guidance ... directs us not to request law  
9 enforcement involvement preemptively, and only if absolutely necessary to protect the  
10 physical safety of our campus community.”<sup>40</sup> But notwithstanding its awareness of  
11 violence and its self-professed heartbreak, UCLA still did not request meaningful law  
12 enforcement involvement.

13 34. Vice Chancellor Osako further announced that UCLA “instituted additional  
14 security measures and increased the numbers of our safety team members on site.”<sup>41</sup>

15 35. Despite the presence of UCLA’s “safety team,” on April 29, 2024, “the  
16 encampment protesters began using human phalanxes (with protesters shouting, ‘human  
17 chain’) to block certain persons from moving freely through public areas of Royce Quad[]  
18 and surrounded some other individuals to forcibly move them from areas in or adjacent to  
19 the encampment.”<sup>42</sup>

20 36. Those “certain persons” were Jews, Israelis, and/or those that the protestors  
21 perceived to be Jews and Israelis.

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23 <sup>38</sup> *Id.*

24 <sup>39</sup> Republican Staff Report, *Antisemitism on College Campuses Exposed*, House  
25 Committee on Education & the Workforce (Oct. 31, 2024) at 24, 26,  
<https://tinyurl.com/472a7pt5/> (“Staff Report”).

26 <sup>40</sup> *UCLA statement on demonstrations.*

27 <sup>41</sup> *Id.*

28 <sup>42</sup> Ex. A at 53.

1           37. According to media reports one Israeli student who attempted to traverse  
2 Royce Quad was met with screams of “Zionist!” and “Human chain!” The occupiers  
3 “linked arms and marched toward him ... blocking him from accessing the heart of  
4 UCLA’s campus.”<sup>43</sup>

5           38. The occupiers’ stated goal was to exclude perceived Zionists. One occupier,  
6 Agnes Lin, said in an interview with The Los Angeles Times that “[w]hat is not welcome  
7 is Zionism.” Another occupier, Sabrina Ellis, admitted that the protestors’ “top priority  
8 isn’t freedom of movement.” Ellis told The Los Angeles Times that students were not  
9 allowed to cross the encampment unless they agreed with the protestors’ demands, which  
10 included boycotting Israeli universities.<sup>44</sup>

11           39. UCLA’s Task Force concluded that the occupiers systemically and  
12 purposefully targeted Jews. For example, a Jewish student reportedly was told that he  
13 could not access a public walkway to Powell Library after “a male activist eyed his Star  
14 of David necklace.”<sup>45</sup>

15           40. The occupiers handed out wristbands and “required passerby to wear a  
16 specific wristband to cross” the encampment. The “wristbands were given only to  
17 encampment participants, and people who supported the existence of the state of Israel  
18 were kept out.”<sup>46</sup>

19           41. “By April 30, students wearing a Star of David or a kippah, or those refusing  
20 to denounce their Zionism (which for many Jews, but not all, is akin to renouncing their  
21 Jewish faith), were physically blocked by the protesters’ phalanxes from entering or  
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24 <sup>43</sup> Jenny Jarvie, ‘*Are you a Zionist?*’ *Checkpoints at UCLA encampment provoked fear,*  
25 *debate among Jews*, Los Angeles Times (May 9, 2024), <https://tinyurl.com/yfwmxrsu>.

26 <sup>44</sup> *Id.*

27 <sup>45</sup> Jarvie, ‘*Are you a Zionist?*’

28 <sup>46</sup> Staff Report at 27 (quotation marks omitted).

1 passing through the occupied area of Royce Quad, entering Royce Hall, or entering Powell  
2 Library.”<sup>47</sup>

3 42. The occupiers also “began to arm themselves with weapons, including pepper  
4 spray and lumber.”<sup>48</sup> They established militia-style checkpoints on UCLA’s campus and  
5 refused to allow Jews to traverse public property unless those Jews denounced a core tenet  
6 of their religion.

7 43. The occupiers largely succeeded in their goal of making the heart of campus  
8 *Judenrein*—or at least free of Jews who did not share their desire to annihilate Israel. In  
9 a case brought by Jewish students, *Frankel v. Regents of University of California*, this  
10 Court observed that “Jewish students were excluded from portions of the UCLA campus  
11 because they refused to denounce their faith.”<sup>49</sup>

12 44. Unsurprisingly, the armed antisemites decided to start assaulting Jews.

13 45. One Native American Jewish woman counterprotested by holding a sign  
14 reading “ Hamas supporters are not welcome on native land.” She was “quickly  
15 surrounded by a mob” and was “violently assaulted.” UCLA police were “directly behind  
16 [her] and [did] absolutely nothing.”<sup>50</sup>

17 46. Occupiers pepper-sprayed a Jewish woman wearing a Star of David and  
18 carrying an Israeli flag.<sup>51</sup>

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22 <sup>47</sup> Ex. A at 53-54.

23 <sup>48</sup> *Id.* at 58.

24 <sup>49</sup> *Frankel*, 744 F. Supp. 3d at 1020.

25 <sup>50</sup> Tzvi Joffre, *Anti-Israel protesters at UCLA attack Native American woman opposing*  
26 *Hamas*, The Jerusalem Post (Apr. 28, 2024), <https://tinyurl.com/3eudjtw> (containing a  
video of the assault).

27 <sup>51</sup> *Jewish demonstrator pepper sprayed at UCLA protest*, FOX 11 Los Angeles,  
28 <https://tinyurl.com/mtyspd5>.

1 47. One Jewish student “was knocked to the ground and kicked by encampment  
2 participants. The student was initially unconscious with an open wound on her head, and  
3 she was taken to the hospital for treatment.”<sup>52</sup>

4 48. Occupiers physically assaulted a Jewish man and told him, “Hitler missed  
5 one.”<sup>53</sup>

6 49. Notwithstanding the occupiers’ assaults on Jews and exclusion of Jews and  
7 Israelis, some UCLA faculty members “entered the encampment in support of its  
8 activities. By participating in the encampment activities including denial of campus access  
9 to Jews and those supporting Israel, those faculty participated in and abetted  
10 discrimination against and harassment of Jews and supporters of Israel.”<sup>54</sup>

11 50. On April 30, 2024—a week after the occupiers erected the encampment—  
12 UCLA’s administrators finally issued a statement that “declared the encampment illegal  
13 and directed all those involved to leave or face discipline.”<sup>55</sup> Chancellor Block issued a  
14 statement on April 30 acknowledging that “Jewish students [were] in a state of anxiety  
15 and fear” and that “students on their way to class have been physically blocked from  
16 accessing parts of the campus.”<sup>56</sup>

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23 <sup>52</sup> Ex. A at 57-58.

24 <sup>53</sup> Ex. B at 3.

25 <sup>54</sup> Ex. A at 62.

26 <sup>55</sup> *Id.* at 59.

27 <sup>56</sup> Office of the Chancellor, *Affirming our Values in a Challenging Time*, (April 30, 2024),  
28 <https://tinyurl.com/txeusk8a>.

1 51. At approximately 10:30 P.M. on April 30, counter-protestors “attacked the  
2 encampment[,] and violent skirmishes ensued.”<sup>57</sup> According to the UCLA Faculty  
3 Association, these counter-protestors were “outside agitators” unaffiliated with UCLA.<sup>58</sup>

4 52. While UCLA’s police stood idly by, the occupiers and counter-protestors  
5 attacked each other with pepper spray, blunt objects, and even fireworks.<sup>59</sup>

6 53. The resulting chaos transformed the heart of one of California’s most  
7 prestigious universities into a war zone.<sup>60</sup>



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22 <sup>57</sup> Ex. A at 59; Richard Winton, et. al, *A staggering two weeks at UCLA: Protest, violence,*  
23 *division mark ‘dark chapter,’* Los Angeles Times (May 7, 2024),  
<https://tinyurl.com/2p92jffj>.

24 <sup>58</sup> UCLA Faculty Association, *UCLA-FA Statement On The Anniversary Of The April 30*  
25 *Attack On Our Students* (May 6, 2025), <https://tinyurl.com/4cthf596>.

26 <sup>59</sup> *Watch: Counter-protesters attack UCLA pro-Palestinian camp*, BBC (May 1, 2024),  
<https://tinyurl.com/3533eefh>.

27 <sup>60</sup> Image sources: Karla Rendon, *Photos: Pro-Israeli, pro-Palestinian demonstrators clash*  
28 *at UCLA*, NBC Los Angeles (Apr. 28, 2024).

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11 54. Between 1:40 and 3:00 A.M. on May 1, 2025, police finally arrived and  
12 halted the violence.<sup>61</sup> California Governor Gavin Newsom called the belated police  
13 response “limited and delayed” and “unacceptable.” Los Angeles Mayor Karen Bass  
14 called the violence “absolutely abhorrent and inexcusable.”<sup>62</sup>

15 55. On or about May 1, “a van displaying the Star of David inside a Nazi  
16 swastika, along with antisemitic writing referring to Jews as ‘puppet masters,’ was parked  
17 on UCLA’s campus in support of the encampment.” According to one observer, the  
18 occupiers “did not challenge this van; many who passed it showed immense enthusiasm  
19 and approval for its presence.”<sup>63</sup>  
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24 <sup>61</sup> Winton, et. al, *A staggering two weeks at UCLA*.

25 <sup>62</sup> Regan Morris and Sam Cabral, *UCLA Clashes: Police criticized for ‘delayed’ response*  
26 *to violence*, BBC (May 2, 2024), <https://tinyurl.com/4vh6mkxd>.

27 <sup>63</sup> Ex. A at 65; Ahmed Fouad Alkhatib (@afalkhatib), X (May 2, 2024, 4:48 PM PDT),  
28 <https://tinyurl.com/4e7wxjup>.



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14 56. For unknown reasons, police did not completely clear the encampment the  
15 morning of May 1. Later in the day, the self-anointed UCLA Palestine Solidarity  
16 Encampment, in an apparent effort to prepare to resist a law-enforcement operation,  
17 requested their patrons to provide riot gear such as airsoft goggles, helmets, knee and  
18 elbow pads, and flashlights with strobe settings. This group also requested food, but “NO  
19 bagels.”<sup>64</sup> As UCLA’s Task Force explained, “Banning foods associated with Jews  
20 demonstrates clear antisemitic sentiment and should not be interpreted as an act of  
21 boycotting a country, as bagels are mass produced by many companies worldwide. Bagels  
22 are strongly associated with Jewish culture and religion.”<sup>65</sup>

23 57. As police prepared to clear the encampment, UCLA canceled all on-campus  
24 classes.<sup>66</sup>

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26 <sup>64</sup> Ex. A at 58.

27 <sup>65</sup> *Id.* at 58 n.136.

28 <sup>66</sup> Staff Report at 29.

1           58. The morning of May 2, the Los Angeles Police Department, at last, cleared  
2 the encampment. Many occupiers resisted arrest and clashed with police officers, who  
3 were forced to use rubber bullets to protect themselves.<sup>67</sup>



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27 <sup>67</sup> Winton, et. al, *A staggering two weeks at UCLA*; image source: *In Pictures: Police storm*  
28 *UCLA protest encampment* (May 2, 2024), <https://tinyurl.com/ye29x2rr>.

1 59. The encampment, along with other anti-Israel demonstrations in spring 2024,  
2 cost UCLA nearly \$12.3 million, approximately half a million of which were spent  
3 cleaning up campus and repairing vandalized items and buildings.<sup>68</sup>

4 60. Few, if any, of the occupiers who blocked the heart of campus and terrorized  
5 Jews and Israelis faced any meaningful consequences from UCLA.

6 61. The belated disbanding of the encampment did not end antisemitism and anti-  
7 Israeli discrimination at UCLA.

8 62. On May 6, 2024, UCLA's police found a group of about 40 people inside  
9 Parking Structure 2 wearing masks and in possession of metal pipes, bolt cutters, epoxy  
10 adhesive, super glue, padlocks, heavy-duty chains, and documents "encouraging violence  
11 and vandalism." UCPD believed these individuals planned to use their tools to break into,  
12 occupy, and vandalize Moore Hall.<sup>69</sup>

13 63. UCLA reportedly referred 245 arrests in connection with the encampment  
14 and May 6 incident to the Los Angeles City Attorney's Office. The City Attorney declined  
15 to file charges for every single referral from UCPD "for evidentiary reasons or due to [the  
16 U]niversity's failure or inability to assist in identification or other information needed for  
17 prosecution."<sup>70</sup>

18 64. On May 23, 2024, in testimony before Congress, when asked if UCLA had  
19 taken substantive steps to eliminate discrimination, Chancellor Block admitted that UCLA  
20 "need[s] to do more." He also acknowledged that the occupiers' "explicit glorification  
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22 <sup>68</sup> Gabirelle Gilette and Shiv Patel, *UCLA spends millions on pro-Palestine protests,*  
23 *considers attendants to fund costs*, Daily Bruin (July 29, 2024),  
24 <https://tinyurl.com/3ba4bev4>.

25 <sup>69</sup> UCLA Police Department News Release, *Statement Regarding the Incidents on*  
*Monday, May 6, 2024*, <https://tinyurl.com/5b5753bd>.

26 <sup>70</sup> Office of the City Attorney, LA City Attorney Hydee Feldstein Soto Announces Filing  
27 Decisions from 2024 UCLA/USC Mass Protests, (Apr. 25, 2025),  
28 <https://tinyurl.com/37ysp6cd>.

1 and endorsement of a U.S. designated terrorist group, which massacred 1,200 innocent  
2 Israel civilians on October 7” was “unacceptable.”<sup>71</sup>

3 65. During the Chancellor’s Capitol Hill testimony, protesters established a  
4 second encampment at the Kerckhoff Hall patio with barricades that disrupted campus  
5 operations. They then marched to Dodd Hall where some protesters locked themselves  
6 inside while others blocked access from the outside for about three hours. Members of  
7 UCLA’s Jewish and/or Israeli community had to once again carefully plan their timing  
8 and routes to avoid being confronted by antisemites as they navigated campus.<sup>72</sup>

9 66. On June 10, 2024, protesters made multiple attempts to set up encampments  
10 in various locations. According to UCLA, a group of people dyed the water in Shapiro  
11 Fountain red, used water-filled barriers and chicken wire to block the area, used amplified  
12 sound, and set up tents and canopies. The group then moved to the Kerckhoff Hall patio  
13 carrying wooden shields. There, the group proceeded to vandalize property with  
14 permanent red paint and erected barriers that blocked students and the public from  
15 accessing that part of campus. Simultaneously, another group at Moore Hall disrupted  
16 final exams. The Kerckhoff Hall patio group later moved to an area near Dodd Hall. They  
17 blocked students from entering classrooms, forcing them to miss finals. Additionally,  
18 some students had to be evacuated during their final exams. Throughout the evening,  
19 protestors also violently attacked safety personnel and law enforcement, resulting in at  
20 least six injuries to UCPD personnel and other safety officers. One security guard was left  
21 with his head bleeding after he was struck with an object.<sup>73</sup>

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23 <sup>71</sup> Calling for Accountability: Stopping Antisemitic College Chaos, Hearing before the  
24 Comm. on Educ. and the Workforce, 118th Cong. (2024), <https://tinyurl.com/4nsjayvd>.

25 <sup>72</sup> Hannah Fry, et. al, *Police descend on UCLA after protesters erect new pro-Palestinian*  
26 *encampment*, Los Angeles Times (May 23, 2024), <https://tinyurl.com/587wnbmr>; *Israel*  
27 *on Campus: State of Jewish Bruin Life in Light of the War in Israel*, Hillel at UCLA (May  
28 23, 2024), <https://tinyurl.com/42ethe94>.

<sup>73</sup> UCLA Newsroom, *Condemning Monday’s violence on campus* (June 11, 2024),  
<https://tinyurl.com/mukk8jty>.

1 67. These acts of vandalism, violence, and intimidation—enabled by UCLA’s  
2 ongoing deliberate indifference to discrimination against Jewish and Israeli students—  
3 violated UCLA’s content-neutral time, place, and manner rules.<sup>74</sup>

4 **B. Survey Evidence Confirms that Jewish and Israeli Students Were**  
5 **Excluded from Participation in and Denied the Benefits of a UCLA**  
6 **Education Because of Their Race or National Origin.**

7 68. In June 2024, UCLA’s Task Force surveyed 428 Jewish and Israeli students,  
8 faculty members, and staff at UCLA. All 428 respondents identified as Jewish, and 66  
9 identified as Israeli. The survey asked respondents about their experiences with  
10 antisemitism and anti-Israeli bias at UCLA.<sup>75</sup>

11 69. “Across all respondents, 67.1% (n=285) reported that antisemitism is a  
12 problem or a serious problem at UCLA and 74.9% (n=311) reported that anti-Israeli bias  
13 is a problem or serious problem at UCLA.”<sup>76</sup> And “[o]f great concern to campus safety,  
14 nearly one fifth (n=74) of reporting respondents indicated that they had experienced a  
15 physical threat and 7.1% (n=28) of those responding reported experiencing a physical  
16 attack.”<sup>77</sup> Roughly 50% of Jewish and Israeli students witnessed physical threats or  
17 attacks directed at Jews and Israelis.<sup>78</sup>

18 70. Some surveyed individuals blamed UCLA’s inactions for rampant  
19 antisemitism and anti-Israel discrimination. One opined, “The lack of pushback from the  
20 professors, administration, deans, chancellor, allows this to get worse daily.”<sup>79</sup> Another  
21 explained, “The situations could have been handled much better if UCLA took an active

22 <sup>74</sup> Office of the Administrative Vice Chancellor, *Reminder of UCLA’s Time, Place and*  
23 *Manner Policies to all Bruins*, (Jan. 4, 2024), <https://tinyurl.com/22d8vpcx>.

24 <sup>75</sup> Ex. A at 11, 17.

25 <sup>76</sup> *Id.* at 20.

26 <sup>77</sup> *Id.* at 32.

27 <sup>78</sup> *Id.* at 33.

28 <sup>79</sup> *Id.* at 24.

1 initiative to create a safe environment on campus by controlling protests rather than  
2 producing security for those spewing hate.”<sup>80</sup>

3 71. Several survey respondents described experiencing or witnessing physical  
4 threats and assaults:

5 a. “I was approached and told by a protestor that she belongs to Hamas. A  
6 friend of mine was pepper sprayed by a protestor for her Jewish  
7 identity.”<sup>81</sup>

8 b. “The only incident I saw personally was during the first few hours of the  
9 encampment, in which a pro-Palestinian girl (a history TA [teaching  
10 assistant], according to herself) walked up to the pro-Israeli counter  
11 protestors and started shouting at them. A girl started recording the  
12 incident, which caused the TA to threaten her with violence if she  
13 continued. Because it was within her legal right and also for safety  
14 purposes, she continued. In return, the TA promptly slapped her several  
15 times and then tried to run away.”<sup>82</sup>

16 c. “I was assaulted, threatened, and harassed during the encampment. I had  
17 an Israeli flag and a man ran towards me in order to push me. I was  
18 blocked for being Jewish. They were calling for an intifada collectively  
19 which is to kill the Jews.”<sup>83</sup>

20 72. Perhaps most alarmingly, 59.6% of all respondents “reported spending less  
21 time on campus due to antisemitism and anti-Israeli bias,” and 41.4% of all respondents  
22 “affirmatively stated that they had thought about leaving UCLA due to antisemitism or  
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24  
25 <sup>80</sup> *Id.* at 30.

26 <sup>81</sup> *Id.* at 35.

27 <sup>82</sup> *Id.*

28 <sup>83</sup> *Id.*

1 anti-Israeli bias.”<sup>84</sup> This is, of course, precisely what the occupiers and other protestors  
2 intended.

3 73. UCLA’s David Geffen School of Medicine contemporaneously witnessed a  
4 “dramatic decline in Jewish student enrollment from 20-30% of the student body to fewer  
5 than 10 students per class of 175.”<sup>85</sup>

6 **C. UCLA Had Actual Knowledge of the Harassment and Exclusion of**  
7 **Jewish and Israeli Students.**

8 74. UCLA knew that Jewish and Israeli students faced a hostile educational  
9 environment following Hamas’s October 7 terrorist attack.

10 75. According to the Task Force Report, at least 129 Jews or Israelis at UCLA  
11 “made an informal or formal complaint.”<sup>86</sup>

12 76. A small sample of complaints received by UCLA follows:

- 13 a. “On 04/30/2024, Complainant reported being barred from entering the  
14 area of Royce Hall and Royce Quad because she is Jewish. Non-Jewish  
15 students put up walls, physically barred them and others from access, and  
16 requested to see ‘wristbands’ near Royce Quad to pass.”
- 17 b. “On 04/30/2024, Complainant reported that her child is unable to access  
18 classes or the library because protestors will not give him a wristband  
19 because they know him to be Jewish.”
- 20 c. “On 05/02/2024, openly Jewish Complainant reported that they and their  
21 friend were walking to Lab when they heard a man shouting ‘Kike’ and

22 <sup>84</sup> *Id.* at 41-42.

23 <sup>85</sup> Letter from Jewish Faculty Resilience Group to UCLA Chancellor Julio Frenk, et. al  
24 (Feb. 9, 2025), available at <https://tinyurl.com/29h9vppu>. The Department of Justice has  
25 found that the David Geffen School of Medicine presently “intentionally discriminates  
26 against applicants based on their race.” Department of Justice letter to Debo P. Adegbile,  
27 *Re: United States’ May 9, 2025, Title VI Inquiry Findings* (May 9, 2025) 1,  
<https://tinyurl.com/msv3ym6x>.

28 <sup>86</sup> Ex. A at 36.

1 'fuck you kike' repeatedly. Respondent then attacked a Jewish family and  
2 chased them while screaming 'Fuck you Jews, hope you fucking rot in  
3 hell where you all belong.' Complainant informed security and alleges  
4 concerns were brushed off."

5 d. "On 05/02/2024, Complainant reported they were at the protest for  
6 Palestine and were standing and holding a sign peacefully. Two  
7 Respondents attempted to knock down the sign by swinging at  
8 Complainant with a flag. When they were unsuccessful, one of the  
9 Respondents ... grabbed Complainant by the hair with enough force to  
10 break the hair clip Complainant was wearing and rip out some hair."

11 77. UCLA knew that occupiers erected an enormous encampment in the heart of  
12 its campus. On April 26, 2024, UCLA's administrators sent a campuswide alert, stating  
13 that they were "monitoring" the "mostly peaceful" situation.<sup>87</sup>

14 78. That same day, a Jewish woman was beaten with a stick at the "mostly  
15 peaceful" encampment, prompting the Executive Director of the UCLA Hillel to email  
16 Chancellor Block and urge him to end the encampment."<sup>88</sup>

17 79. Even before occupiers began to physically exclude Jewish and Israeli  
18 students from academic buildings, UCLA leadership privately "recognized the  
19 encampment as a threat to student and campus safety."<sup>89</sup> On or about April 27, 2024,  
20 campus police "requested a drone operator, at least 100 security contractors, and an LAPD  
21 mobile field force."<sup>90</sup>

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25 <sup>87</sup> Staff Report at 26.

26 <sup>88</sup> *Id.*

27 <sup>89</sup> *Id.*

28 <sup>90</sup> *Id.*

1 80. On April 27, 2024, UCLA announced that it “deployed uniformed Student  
2 Affairs Mitigators” and “Public Safety Aides” to “engage in ‘de-escalation.’”<sup>91</sup>  
3 Administrative Vice Chancellor Michael Beck “informed faculty that a large counter-  
4 protest was expected the next day.”<sup>92</sup>

5 81. On April 29, 2024, campus police “discussed its urgent staffing issues.”<sup>93</sup>

6 82. UCLA had actual knowledge that occupiers were preventing Jewish and  
7 Israeli students from accessing academic buildings. The occupiers did so “as uniformed  
8 Student Affairs Mitigators and Public Safety Aides stood idly by.”<sup>94</sup>

9 **D. UCLA Was Deliberately Indifferent to the Harassment and Exclusion of**  
10 **Jewish and Israeli Students.**

11 83. UCLA’s refusal to enforce its own viewpoint-neutral time, place, and manner  
12 rules governing the freedom of speech and assembly evinces its deliberate indifference to  
13 the suffering of its Jewish and Israeli students. These rules existed at all relevant times  
14 and were intended to ensure the orderly operation of campus.<sup>95</sup>

15 84. Some of UCLA’s viewpoint-neutral rules in place during the 2023-2024  
16 academic year provided that no one may:

- 17 a. block entrances or interfere with the free flow of traffic into and out of  
18 campus buildings;
- 19 b. knowingly and willfully interfere with the peaceful conduct of the  
20 activities of the campus or any campus facility by intimidating, harassing,  
21

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22  
23 <sup>91</sup> *Id.*

24 <sup>92</sup> *Id.*

25 <sup>93</sup> *Id.* at 27.

26 <sup>94</sup> *Id.*

27 <sup>95</sup> *See, e.g.,* Office of the Administrative Vice Chancellor, *Reminder of UCLA’s Time,*  
28 *Place and Manner Policies to all Bruins*, (Jan. 4, 2024) <https://tinyurl.com/5n9xhhj9>.

- 1 or obstructing any University employee, student, or any other person  
2 having lawful business with the University;
- 3 c. produce amplified or non-amplified sound that disrupts campus activities;
  - 4 d. camp except in authorized locations;
  - 5 e. engage in physically abusive, threatening, or intimidating conduct toward  
6 any person;
  - 7 f. fail to comply with the directions of a University official acting in the  
8 performance of his or her duties;
  - 9 g. refuse to identify themselves to the relevant University officials and  
10 present a BruinCard upon reasonable cause;
  - 11 h. put signs, posters, paint, chalk, or ink messages on walls, windows, floors,  
12 or other surfaces of campus buildings or structures, streets, or walkways  
13 except as set forth in the applicable policies;
  - 14 i. possess weapons that could cause bodily injury on campus except as  
15 authorized;
  - 16 j. wear a mask or personal disguise or otherwise conceal their identity to  
17 intimidate others or escape identification while violating UCLA policies  
18 or the law; or
  - 19 k. demonstrate without prior written approval from the UCLA Events  
20 Office.<sup>96</sup>

21 85. UCLA's Student Conduct Code also requires students to comply with the  
22 directions of UCLA officials and public officials acting in the course of their duties on  
23 UCLA property and not to resist or obstruct UCLA or public officials when performing  
24 their duties.<sup>97</sup>

25 <sup>96</sup> See generally UCLA Regulations on Activities, Registered Campus Organizations, and  
26 Use of Properties (Sept. 25, 2017), <https://tinyurl.com/ymcahak4>.

27 <sup>97</sup> Student Conduct Code: 102.16 Failure to Comply, UCLA Office of Student Conduct,  
28 <https://tinyurl.com/mwhjfvza>.

1 86. Although students and faculty have a right to peacefully protest, they may do  
2 so only in accordance with UCLA’s lawful time, place, and manner restrictions. Despite  
3 the existence of longstanding viewpoint neutral time, place manner restrictions, UCLA’s  
4 administrators allowed antisemitic and anti-Israel protests made up of students,  
5 employees, and non-affiliates to increasingly violate UCLA’s rules with impunity,  
6 emboldening them to deface the campus and commit acts of violence. This culminated in  
7 a nearly week-long encampment and the de facto exclusion of Jews and Israelis from the  
8 heart of UCLA’s campus. Indeed, UCLA’s Task Force found that “throughout most of  
9 2023-2024, campus leadership repeatedly decided not to enforce federal law, state law,  
10 and University and campus rules,” “resulting in failure to protect the Constitutional rights  
11 of Jews on campus.”<sup>98</sup>

12 87. UCLA allowed the encampment to persist for over a week, even though the  
13 encampment violated over a dozen rules.

14 88. As UCLA’s Task Force Report explained,

15 “From the outset, the encampment itself stood in violation of several  
16 University and campus rules. Tents were erected by affiliates and non-  
17 affiliates and remained on Royce Quad day and night, in violation of (1) UC  
18 Office of the President (UCOP) regulations prohibiting non-affiliates from  
19 setting up or maintaining any tent or camping overnight on University  
20 property; (2) UCOP Policies applying to Campus Activities, Organizations,  
21 and Students (PACAOS) prohibiting any use of University property by  
22 students or student organization in violation of time, place, and manner  
23 restrictions; (3) the UCLA Group Code of Conduct prohibitions on placement  
24 of temporary structures on campus, (4) unauthorized extracurricular use of  
25 University facilities, (5) unauthorized holding an ‘interim major event not  
26 sponsored by a University unit;’ (6) and several other UCLA regulations ...  
27 (7) Attaching plywood to the bicycle racks violated UCOP regulations  
28 prohibiting the unauthorized erection of barriers and structures, (8) the UCLA  
Group Conduct Code prohibition on misuse of University property, (9) and  
other UCLA policies and procedures ... (10) Painting, writing, or chalking  
graffiti on University property, violates California state law prohibiting  
vandalism, and the extent of damage that graffiti caused constituted felony

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<sup>98</sup> Ex. A at 6, 45.

1 vandalism; (11) violates the Student Conduct Code and University Group  
2 Conduct Code prohibitions of damage or destruction of University property;  
3 and (12) violates the UCLA Regulations on Activities, Registered Campus  
4 Organizations, and (13) Use of Properties’ prohibition against paint, chalk, or  
ink messages affixed to surfaces of campus buildings or structures.”<sup>99</sup>

5 89. Rather than enforce its rules against the occupiers, UCLA “simply  
6 ‘monitor[ed]’ as conditions deteriorated, and only act[ed] once the campus erupted into  
7 open violence. Members of the radical, antisemitic, and illegal encampment, whitewashed  
8 by UCLA’s public statements as a demonstration ‘for Palestinian rights,’ escaped  
9 accountability for exclusion of Jewish students from campus. Even the students and  
10 affiliates arrested for acts of violence and resisting arrest avoided suspension or even  
11 probation.”<sup>100</sup> Nearly all of the arrested students avoided criminal charges, in large part  
12 due to UCLA’s “failure or inability to assist in identification or other information needed  
13 for prosecution.”<sup>101</sup>

14 90. After the encampment was finally disbanded, UCLA continued to display  
15 shocking disregard for the rights of its Jewish students. In *Frankel*, UCLA maintained  
16 that it “has no responsibility to protect the religious freedom of its Jewish students because  
17 the exclusion was engineered by third-party protesters.”<sup>102</sup>

18 91. On October 7, 2024, in an apparent celebration of the one-year anniversary  
19 of Hamas’s terrorist attacks, SJP “organized and held a demonstration in North Dixon  
20 Court, advertised by SJP as requiring masks, in violation of campus time, place, and  
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23 \_\_\_\_\_  
24 <sup>99</sup> Ex. A at 51-53 (numbers added).

25 <sup>100</sup> Staff Report at 30.

26 <sup>101</sup> Office of the City Attorney, *LA City Attorney Hydee Feldstein Soto Announces Filing*  
27 *Decisions from 2024 UCLA/USC Mass Protests*, (Apr. 25, 2025),  
<https://tinyurl.com/37y6cd>.

28 <sup>102</sup> *Frankel*, 744 F. Supp. 3d at 1020.

1 manner restrictions, and other campus and University rules.”<sup>103</sup> On information and belief,  
2 UCLA took no corrective action.

3 92. In October 2024, the Republican Staff of the House of Representatives  
4 Committee on Education & the Workforce published a report (“Staff Report”) finding that  
5 “UCLA allowed the creation of a hostile environment for Jewish students, in violation of  
6 Title VI.”<sup>104</sup>

7 93. The Staff Report found that the violent clashes between occupiers and  
8 counter-protestors “was the direct result of UCLA’s failure to hold rule-breaking students  
9 and their trespassing allies in the encampment accountable for days of civil rights  
10 violations and violence targeted at Jewish students and supporters of the existence of the  
11 state of Israel.”<sup>105</sup>

12 94. The Staff Report agreed with UCLA’s Task Force’s finding that “the  
13 encampment was unlawful and in violation of UCLA policy from the second it was formed  
14 in the early hours of April 25, 2024.” UCLA nonetheless “chose to ignore its own rules  
15 and ‘monitor’ the encampment, prioritizing ‘de-escalation’ rather than taking decisive  
16 action.”<sup>106</sup>

17 95. The Staff Report provided additional details regarding UCLA’s deliberate  
18 indifference toward the encampment and its discriminatory effects on Jewish and Israeli  
19 students. For example, UCLA ignored the advice of its own safety officials. When the  
20 encampment was first being constructed, a UCLA police officer suggested that campus  
21 police “attempt to identify the individuals and remove anyone who was not a member of  
22 the faculty, staff, or student body.” The officer was instructed to “hold off.”<sup>107</sup> The UCLA  
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24 <sup>103</sup> Ex. A at 71.

25 <sup>104</sup> Staff Report at 24 (emphasis omitted), *supra* n. 39.

26 <sup>105</sup> *Id.*

27 <sup>106</sup> *Id.*

28 <sup>107</sup> *Id.* at 25.

1 fire marshal warned administrators that the “wall of wooden pallets” surrounding the  
2 encampment and that blocking ingress and egress for Jewish and Israeli students was  
3 “unacceptable,” but “no action was taken to disperse the encampment or prevent further  
4 fortification.”<sup>108</sup>

5 96. In February 2025, UCLA finally issued an interim suspension of registered  
6 student organization status against SJP and Graduate SJP, even though these groups were  
7 responsible for much of the misconduct described above. The suspension came after  
8 people affiliated with the groups harassed Regent Jonathan Sures and members of his  
9 family outside his home, surrounded one of his family member’s cars and prevented the  
10 family member from leaving, and vandalized Sures’s home by applying red-colored  
11 handprints to the outer walls of his home and hanging banners on the property’s hedges.<sup>109</sup>  
12 UCLA was deliberately indifferent to these groups’ brazen defiance of its rules and  
13 discrimination against Jewish and Israeli students for over a year but took action only after  
14 the groups targeted a regent.

15 97. In March 2025, after the United States began investigating antisemitism and  
16 anti-Israeli bias in the University of California system, UCLA indefinitely revoked SJP’s  
17 registered student organization status and suspended GSJP’s status.<sup>110</sup>

18 98. Like UCLA’s other rules, this ban existed only on paper, and no one took  
19 meaningful efforts to enforce it. According to social-media reports, SJP held the following  
20 events after the ban went into effect:

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24 <sup>108</sup> *Id.*

25 <sup>109</sup> UCLA Office of the Chancellor, *A Stand Against Violence in our Community* (Feb. 12,  
26 2025), <https://tinyurl.com/282ysv7s>.

27 <sup>110</sup> Jaweed Kaleem, *UCLA bans Students for Justice in Palestine as a campus*  
28 *organization*, Los Angeles Times (Mar. 28, 2025), <https://tinyurl.com/73k4xn9m>.

- 1 a. On April 30, 2025, SJP held an event to screen a documentary on the  
2 Royce Quad.<sup>111</sup>
- 3 b. On May 15, 2025, SJP held a demonstration at Dickson Court North.<sup>112</sup>
- 4 c. On July 31, 2025, SJP held a demonstration on the UCLA quad.<sup>113</sup>
- 5 d. On October 7, 2025, SJP held another demonstration, where its members  
6 walked through campus while officials stood by and did not engage.  
7 Asked why the police were not enforcing the no masking rules, a UCLA  
8 police officer responded that he was “not that high up on that totem pole”  
9 to make that determination.<sup>114</sup>
- 10 e. On January 20, 2026, SJP held another demonstration outside of Murphy  
11 Hall and then proceeded to march and chant through the campus. No  
12 UCLA official or law-enforcement officer intervened despite the  
13 intimidating nature of the event.<sup>115</sup>

14 99. In addition to failing to enforce its own time, place, and manner rules, UCLA  
15 also failed to enforce its anti-discrimination policy.

17 <sup>111</sup> Matthew (@melamedtattle), X (Apr. 28, 2025, 6:23 AM PDT),  
18 <https://tinyurl.com/yd2vbuz9>; *see also* Epistemology Quest (@EQuest38190), X (May 1,  
19 2025, 10:40 AM PDT), <https://tinyurl.com/3rhsf8br> (reposting announcement for SJP  
event on April 30, 2025).

20 <sup>112</sup> Matthew Feinberg (@thewebbie), X (May 14, 2025, 5:01 PM PDT),  
21 <https://tinyurl.com/36wsbbrc>; *see also* Eyal Yakoby (@EYakoby), X (May 15, 2025, 1:10  
22 PM PDT), <https://tinyurl.com/mss2wbmy>.

23 <sup>113</sup> FAMOUSCENES3 (@LA84SUNRISE), X (July 31, 2025, 3:08 PM PDT),  
<https://tinyurl.com/ys8pyp3c> (video documenting demonstration).

24 <sup>114</sup> Jewish Faculty at UCLA (@JFrgatUCLA), X (Oct. 9, 2025, 8:00 AM PDT),  
25 <https://tinyurl.com/35c5f4sz>; *see also* JFrgatUCLA, *2025 10 07 Noon Demonstration at*  
26 *UCLA By Masked “Suspended” SJP Group*, YouTube (Oct. 8, 2025),  
<https://tinyurl.com/yf54yp27>.

27 <sup>115</sup> Carolina Barsakov, *SJP protest outside of UCLA’s Murphy Hall*, Daily Bruin (Jan. 20,  
28 2026), <https://tinyurl.com/mvwejwvt> (including video documenting demonstration).

1           100. The 2024 University of California Anti-Discrimination Policy prohibited  
2 “conduct based on an individual’s actual or perceived Protected Category ... “that is  
3 sufficiently severe, persistent, or pervasive that it unreasonably interferes with, denies, or  
4 adversely limits an individual’s participation in or benefit from the education,  
5 employment, or other programs or activities of the University, and creates an environment  
6 that a reasonable person would find to be intimidating or offensive.” To determine  
7 whether conduct is harassment, the University considered, among other factors,  
8 “[w]hether the conduct was physically threatening” or “[w]hether the conduct would be  
9 objectively viewed as intimidating or offensive by a reasonable person.”<sup>116</sup>

10           101. “Protected Categor[ies]” included any “identity protected by federal or state  
11 law, including the following: race, religion, color, citizenship, national or ethnic origin,  
12 [and] ancestry.”<sup>117</sup>

13           102. By physically excluding Jews and Israelis from Royce Quad and adjacent  
14 buildings on the basis of their religion or national or ethnic origin, the occupiers of the  
15 encampment violated the Anti-Discrimination Policy. UCLA did not take adequate or  
16 timely measures to enforce the Policy.

17           103. Further, UCLA has a pattern or practice of ignoring or otherwise failing to  
18 investigate and effectively respond to complaints raised by Jewish and Israeli students,  
19 even though its Anti-Discrimination Policy pledges that UCLA “will respond promptly  
20 and equitably” to such complaints.<sup>118</sup>

21           104. Students believed that “campus offices responsible for enforcing such rules  
22 are indifferent or resistant to complaints related to antisemitism or anti-Israeli bias.”<sup>119</sup>

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24 <sup>116</sup> University of California Anti-Discrimination Policy, 2 (Feb. 20, 2024),  
25 <https://tinyurl.com/4z7232jh> (“Anti-Discrimination Policy”).

26 <sup>117</sup> *Id.* at 4

27 <sup>118</sup> *Id.* at 5.

28 <sup>119</sup> Ex. A at 75.

1           105. UCLA’s indifference toward complaints filed by Jewish and Israeli students  
2 chills the filing of meritorious complaints. One Jewish student who “was blocked by  
3 demonstrators from accessing Royce Quad ... did not file a complaint with UCLA because  
4 a friend of theirs previously filed a similar complaint and no action was taken by the  
5 University.”<sup>120</sup>

6           **E. UCLA’s Faculty and Staff Are Systemically Biased Against Israel and**  
7           **Israelis.**

8           106. In 2024, UCLA’s EDI Office insisted that UCLA does “not tolerate acts of  
9 discrimination, harassment or conduct causing harm to individuals on the basis of race,  
10 color, ethnicity, gender, age, disability, religious beliefs, political preference, sexual  
11 orientation, gender identity, citizenship or national origin.”<sup>121</sup> UCLA did, in fact, tolerate  
12 discrimination, harassment, and other harmful conduct against Jews and Israelis.

13           107. Even before Hamas’s October 7, 2023, terrorist attack on Israel, many of  
14 UCLA’s faculty and academic departments were hostile to Israel and Israelis. For  
15 example:

- 16           a. In May 2021, while Hamas was launching rockets into Israel, the  
17 Department of Asian American Studies issued an official statement,  
18 “lend[ing] our voices to uplifting the struggle of the Palestinian people.”  
19 The Department proudly “salute[d] the ‘Unity Uprising’ as people across  
20 all parts of Palestine,” including “historic Palestine [and] Jerusalem” (*i.e.*,  
21 Israel) “rise up together.” The Department also blamed “the Israeli  
22 military’s policing of the apartheid wall dividing Jerusalem and isolating  
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26 <sup>120</sup> Ex. B at 6.

27 <sup>121</sup> UCLA EDI Office, *Inclusive Excellence Framework for Advancing EDI @ UCLA*,  
28 <https://tinyurl.com/bd8fu7e8>.

1 the West Bank” for “the U.S.’s own brutal border security policies along  
2 the U.S.-Mexico border.”<sup>122</sup>

3 b. In May 2021, the Center for the Study of Women and Department of  
4 Gender Studies signed a statement reading, “We stand in solidarity with  
5 the people of Palestine. We unequivocally answer and amplify the call  
6 from the Palestinian Feminist Collective for ‘feminists everywhere to  
7 speak up, organize, and join the struggle for Palestinian liberation.’”<sup>123</sup>

8 108. The faculty’s anti-Israel bias intensified after Hamas’s October 7, 2023,  
9 terrorist attack on Israel.

10 a. UCLA’s Task Force received reports of “faculty teaching of content  
11 unrelated to a course, in violation of the APM [Academic Personnel  
12 Manual] prohibition on significant intrusion of material unrelated to a  
13 course and the Regents’ Policy on Course Content, which prohibits ...  
14 political indoctrination.”<sup>124</sup> The quantity and contents of these reports are  
15 presently unknown to the United States.

16 b. According to UCLA’s Task Force, 49% of Jewish and Israeli  
17 undergraduates “reported that teaching assistants engaged in behaviors  
18 that included offensive comments, verbal attacks, or discrimination.”<sup>125</sup>

19 c. For example, in March 2024, a keffiyeh-clad guest speaker in the course  
20 Structural Racism and Health Equity—a mandatory course at the David  
21 Geffen School of Medicine—led the class in chanting “Free, Free  
22

23  
24 <sup>122</sup> UCLA Department of Asian American Studies, *Statement of Solidarity with Palestine*  
(May 21, 2021), <https://tinyurl.com/ysnaysru>.

25 <sup>123</sup> Gender Studies Departments in Solidarity With Palestinian Feminist Collective (May  
26 24, 2021), <https://tinyurl.com/jb8k7f2u>.

27 <sup>124</sup> Ex. A at 61.

28 <sup>125</sup> *Id.* at 1-2, 33, 82.

1 Palestine” and prayed for “black” and “brown” people.<sup>126</sup> A UCLA staff  
2 member questioned one student who refused to participate, “which some  
3 students perceived as a form of discipline, singling them out while  
4 pressuring them to recite speech with which they disagreed or that violated  
5 their religious beliefs.”<sup>127</sup>

6 109. Many UCLA departments, programs, and faculty affirmatively supported the  
7 illegal encampment and denounced UCLA’s belated action to protect its Jewish and Israeli  
8 students. These statements evince overwhelming faculty hostility towards Israelis and  
9 apathy towards the suffering of Jewish and Israeli students.

10 a. The Center for the Study of Women announced, “[W]e stand with our  
11 students who bravely upheld their moral and ethical obligations to protest  
12 in solidarity with the people of Palestine and against ongoing genocide in  
13 the face of mob violence and an administration that has demonstrated its  
14 eagerness to use brutal police force against them. We demand full  
15 amnesty for those arrested or faced with disciplinary action ... we join our  
16 students in denouncing Israel’s ongoing campaign of genocide in  
17 Palestine.”<sup>128</sup> The Center for the Study of Women did not condemn the  
18 “mob violence” faced by Jewish and Israeli students.

19 b. The Department of Art issued a statement decrying “the appalling  
20 violence that pro-Palestine student protestors experienced” and UCLA’s  
21 belated decision “to call law enforcement in to forcibly destroy the  
22

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23 <sup>126</sup> Aaron Sibarium, *UCLA Med School Requires Students To Attend Lecture Where*  
24 *Speaker Demands Prayer for ‘Mama Earth,’ Leads Chants of ‘Free Palestine.’* Wash.  
25 Free Beacon (Apr. 2, 2024), <https://tinyurl.com/yb3ww3mv>.

26 <sup>127</sup> Ex. A at 61.

27 <sup>128</sup> UCLA Center for the Study of Women, *Center for the Study of Women Statement on*  
28 *Palestine Solidarity Encampment and Protests* (May 9, 2024),  
<https://tinyurl.com/3bk23pju>.

1 encampment and arrest peaceful student protestors under the guise of  
2 campus safety. Students being shot with rubber bullets, trampled  
3 underfoot, and hit with police batons before being arrested is the opposite  
4 of campus safety.”<sup>129</sup> The Department of Art did not address whether the  
5 physical beatings of Jews is “the opposite of campus safety.”

6 c. “The Black, Latinx, and Native American Faculty Collective of the David  
7 Geffen School of Medicine” described the encampment as a “peaceful  
8 Palestinian Solidarity Encampment” and complained that “the university  
9 police stood back, simply watched, filmed, and failed to stop the  
10 unrelenting violence” by “white supremacists.” The Collective did not  
11 lament the “unrelating violence” that the occupiers inflicted on Jewish and  
12 Israeli students but instead demanded “[a]mnesty for all students and  
13 faculty arrested.”<sup>130</sup>

14 d. Faculty in the Department of Design Media Arts admitted that they  
15 “participated in the peaceful, disciplined, and courageous protests” and  
16 declared that “[n]either our universities nor our taxes should be connected  
17 to perpetuating the brutal and unlawful military occupation imposed on  
18 the Palestinian people in Gaza and the West Bank. To stand up against  
19 this is something for which these students should be commended, not  
20 punished.”<sup>131</sup> The professors did not address whether our universities or  
21

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22 <sup>129</sup> UCLA Department of Art, *Faculty Response to Violence on Our Campus*,  
<https://tinyurl.com/5fc9e482>.

23 <sup>130</sup> UCLA Black, Latinx, and Native American (BLNA) Faculty Collective of the David  
24 Geffen School of Medicine (DGSOM), *Statement from the [Collective] in Support of*  
25 *Students and Faculty and Broader Bruin Community Subject to Emotional and Physical*  
*Violence During the Past Week’s Events*, <https://tinyurl.com/2jzvpe3p>.

26 <sup>131</sup> *Statement of undersigned members of the UCLA Department of Design Media Arts*  
27 *Faculty in response to the forcible removal of the Student Encampment* (May 4, 2024),  
28 <https://tinyurl.com/426say79>.

1 our taxes should fund the physical exclusion of Jews and Israelis from  
2 academic buildings.

3 e. Faculty in the Mathematics Department denounced UCLA’s “shameful  
4 ... failure to protect our students” in the “protest encampment” from “an  
5 unprovoked mob attack.” They called for a “transparent explanation” of  
6 UCLA’s “coordination with the tactics of the militarized police forces.”<sup>132</sup>

7 They did not request a “transparent explanation” as to why UCLA  
8 tolerated a militarized antisemitic and anti-Israeli encampment.

9 f. Faculty in the Department of Architecture and Urban Design *affirmatively*  
10 *endorsed* how occupiers “check[ed] IDs to gain access” to areas they  
11 forcibly overran. The faculty praised the encampment as “an effective  
12 space where self-discipline was a collective, ongoing project which  
13 initially appeared to be supported and even praised by university  
14 administration.” They announced that the occupiers had the right “to be  
15 kept safe.”<sup>133</sup> They left unsaid whether that right extends to Jewish and  
16 Israeli students.

17 g. Faculty in Department of Anthropology labeled the encampment as “a  
18 model of its kind” and praised its “peaceful, orderly and self-disciplined  
19 environment.” The faculty complained that then-peaceful counter-  
20 protestors “terrorize[d] the students” in the encampment by showing  
21 videos of Hamas’s October 7 atrocities. They also accused UCLA of  
22 “turn[ing] on its own students” by clearing the encampment and blamed  
23

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24 <sup>132</sup> *Statement of the undersigned members of the UCLA Mathematics Department on the*  
25 *actions of the administration in response to recent student protests,*  
<https://tinyurl.com/r3asfh86>.

26 <sup>133</sup> *Statement of the Undersigned Members of the UCLA Department of Architecture and*  
27 *Urban Design Faculty in Response to Recent Events on Our Campus* (May 4, 2024),  
28 <https://tinyurl.com/4azz9xk3>.

1 police for “refusing entry to Anthropology faculty trying to access our  
2 offices” in Haines Hall.<sup>134</sup> They made no mention of the Jewish and Israel  
3 students refused entry to buildings by armed occupiers, nor did they  
4 address how UCLA turned on its Jewish and Israeli students by failing to  
5 guarantee their physical safety.

6 h. Links to many additional, similar, statements are available at a website  
7 entitled *We Stand With Our Students / UCLA Faculty and Staff Speak*  
8 *Out*.<sup>135</sup> For unknown reasons, many of these statements appear to have  
9 been deleted, but according to a report by the Amcha Initiative, 33  
10 academic units demanded amnesty for student protestors.<sup>136</sup>

11 110. Some faculty members “excused class attendance or assignments due to  
12 students or the faculty themselves participating in the encampment. There were also  
13 reports of courses offering extra credit for attendance at the encampment or related  
14 events,” in violation of UCLA policy prohibiting faculty from interrupting “progress of an  
15 academic course ... for purposes of political indoctrination or discussion of matters  
16 unrelated to course content.”<sup>137</sup>

17 111. UCLA faculty preached anti-Israeli bias in courses having nothing to do with  
18 Israel and vociferously supported the antisemitic and anti-Israel encampment. The EDI  
19 Office—the very bureaucracy tasked with preventing discrimination—suffered from  
20 similar biases.

21  
22  
23 <sup>134</sup> *Statement of members of the UCLA Department of Anthropology Faculty in response*  
24 *to the forcible removal of the Student Encampment*, <https://tinyurl.com/5bm87ff9>.

25 <sup>135</sup> See <https://tinyurl.com/4k5y8bd>.

26 <sup>136</sup> Amcha Initiative, *When Faculty Take Sides: How Academic Infrastructure Drives*  
27 *Antisemitism at the University of California* (Feb. 2026) at 23,  
28 <https://tinyurl.com/557aw7k8>.

<sup>137</sup> Ex. A at 62 (quotation marks omitted).

1 a. Former Vice Chancellor for Equity, Diversity, and Inclusion Anna Spain  
2 Bradley repeatedly has expressed outrage about Israel’s military  
3 operations in Gaza while expressing no similar outrage about Hamas’s  
4 attacks on innocent Israel civilians.<sup>138</sup>



12 b. In 2019, Vice Chancellor Bradley wrote a law-review article calling for  
13 racism to be “named ... a violation of human rights under international  
14 law” and suggesting that those who “are not outraged by the prevalence  
15 of racism in today’s world” have failed to “consider the depth of its  
16 harms.”<sup>139</sup>

17 c. Vice Chancellor Bradley nevertheless failed to consider the depth of  
18 UCLA students’ racism against Jews and Israelis. Although she  
19 condemned the counter-protestors who attacked the encampment and its  
20 occupiers, she offered no similar condemnation of the occupiers’ attacks  
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27 <sup>138</sup> Anna Spain Bradley (@ASpainBradley), <https://x.com/ASpainBradley>.

28 <sup>139</sup> Anna Spain Bradley, *Human Rights Racism*, 32 Harv. Hum. Rts. J. 1, 7-8 (2019).

1 on Jews and Israelis. She also characterized the occupiers' conduct as  
2 "speech" and suggested that they were "stand[ing] against oppression."



4 **Anna Spain Bradley** @ASpainBradley · May 1, 2024

5 The actions of the men who came on campus in the night and used  
6 violence against @UCLA students are completely unacceptable. At  
7 university, we learn to fight speech with speech, not violence, and we aim  
8 to stand against oppression without becoming the oppressors.



- 14 d. The EDI Office's Civil Rights Office was at all relevant times led by  
15 Assistant Vice Chancellor for Civil Rights Chandra Bhatnagar, who was  
16 also UCLA's Local Implementation Officer for the UC Anti-  
17 Discrimination Policy. As the head of UCLA's impotent diversity  
18 bureaucracy, Bhatnagar was responsible for overseeing the handling and  
19 investigation of antisemitism complaints.
- 20 e. Bhatnagar has argued that "the United States is legally bound to fight  
21 racism."<sup>140</sup> Bhatnagar was legally bound by Title VI and UCLA's  
22 contracts with the United States to fight racism against Jewish and Israeli  
23 students at UCLA. He chose not to do so.
- 24 f. Bhatnagar's wife, UCLA law professor Sunita Patel, proudly participated  
25 in the encampment while wearing a mask, in violation of UCLA policy.  
26 She described the encampment as a "liberation zone."<sup>141</sup>

27 <sup>140</sup> Thalif Deen, *Despite Western Boycott, Racism Meet Gets Overwhelming Support*,  
28 *Global Issues* (Sept. 22, 2011), <https://tinyurl.com/yuyj29f2>.

<sup>141</sup> Sunita Patel (@ProfSPatel), X (Apr. 28, 2024, 9:24 PM PDT),  
<https://tinyurl.com/3n6c9wyd>.



12 g. At all relevant times, Jonathan Perkins was Director, Race and Equity in  
13 the EDI Office’s Research and Bruin Engagement Office. Perkins  
14 believes that “white people possess very little actual, real-world  
15 knowledge about race issues, particularly about what it’s like to be a  
16 member of a race this country deems abnormal and inferior.”<sup>142</sup> He has  
17 posted on Bluesky that “white people are quite ignorant when it comes to  
18 race and racism” and that “it simply is not possible for a Black person to  
19 be racist toward a white person.”<sup>143</sup> Many Jewish and Israeli students at  
20 UCLA are white or perceived as white.

21 h. Perkins also has claimed that “[n]o meaningful civil rights advancement  
22 has taken place in this country without riots.”<sup>144</sup>

23  
24 <sup>142</sup> Jonathan Perkins, *Choice: An Insidious Feature of Whiteness* (May 22, 2019),  
<https://tinyurl.com/5heb849z>.

25 <sup>143</sup> JP (@johnathanperk.bsky.social), Bluesky (Mar. 1, 2026, 7:01 AM PST),  
26 <https://tinyurl.com/3244r5hy>.

27 <sup>144</sup> Jonathan Perkins, *Don’t Talk To Me About Looting: An Open Letter* (May 31, 2020),  
28 <https://tinyurl.com/msmb4eee> (emphasis in original).

1 i. Perkins took no meaningful action to prevent racism against his Jewish  
2 and Israeli charges.

3 112. UCLA’s antisemitic and anti-Israeli biases extend to UCLA’s employment  
4 practices. These illegal employment practices are the subject of another lawsuit brought  
5 by the United States, *United States v. Regents of the University of California*.<sup>145</sup> That  
6 complaint illuminates systemic antisemitism and anti-Israeli bias at UCLA. For example,  
7 it alleges UCLA’s Undergraduate Students Association Council Cultural Affairs  
8 Commission discriminated against “Zionist” students because it equated Zionism to  
9 “antiBlackness” and other forms of “racism.” The Commission included in its hiring  
10 policies the following language: “We reserve the right to remove any staff member who  
11 dispels antiBlackness, colorism, racism, white supremacy, zionism, xenophobia,  
12 homophobia, transphobia, sexism, misogyny, ableism, and any/all other hateful/bigoted  
13 ideologies.” Alicia Verdugo, the former Commissioner of the CAC, informed her  
14 subordinates: “lots of zionists are applying – please do your research when you look at  
15 applicants and I will also share a doc of no hire list during retreat.” This employment  
16 discrimination is ongoing. Jewish and Israeli employees have indicated that they remain  
17 afraid to come forward with complaints and harassment and discrimination and that they  
18 presently suffer adverse professional consequences because of antisemitism.<sup>146</sup>

19 113. Given the biases of UCLA’s faculty and staff, many Jewish and Israeli  
20 community members believe that UCLA intentionally discriminates against them and  
21 accused UCLA of double standards. One stated, “If it were hate directed against any other  
22 minority group, there would be zero tolerance. It is becoming normalized at UCLA.”  
23 Another individual noted, “Students and faculty at UCLA feel comfortable with  
24 antisemitic behavior (e.g. ‘Are [you] Jewish/Israeli? Then you cannot be here’) that, if it  
25 were directed to any other minority they'd be expelled (e.g. “Are you black? Then you

26 \_\_\_\_\_  
27 <sup>145</sup> No. 2:26-cv-01946 (C.D. Cal.).

28 <sup>146</sup> *Id.*, Dkt. 1 at ¶¶ 84-85, 141-147.

1 cannot be here” or ‘Are you gay?’ Then you cannot be here”). Imagine what would have  
2 happened.”<sup>147</sup>

3 114. Another explained, “People on campus are allowed to wear identity  
4 concealing masks and harass Jewish students and faculty with impunity while the campus  
5 community calls them ‘peaceful’ and comes to their defense. Meanwhile I know Jewish  
6 faculty who have been written up for microaggressions, as Jews are attacked for  
7 weaponizing antisemitism against free speech and racial equity simply for speaking out  
8 against civil rights violations. Insanity reigns.”<sup>148</sup>

9 **F. This Court Held that UCLA Likely Violated the First Amendment by**  
10 **Permitting Occupiers to Exclude Jews from Campus.**

11 115. In June 2024, a group of Jewish students sued Defendant, alleging that  
12 UCLA’s willful tolerance of a “Jew Exclusion Zone” at the heart of campus violated state  
13 and federal law, including the First Amendment and Title VI.<sup>149</sup>

14 116. According to the complaint in that case (*Frankel*), the Jewish plaintiffs were  
15 “prevented from passing through the Jew Exclusion Zone.” One was “repeatedly blocked  
16 from passing through the encampment to reach meetings and study sessions.” Another  
17 was “shooed away by a security officer who” took the side of the occupiers and “chastised  
18 her and called her ‘the problem’ for attempting to peacefully observe the encampment.”  
19 A third “was harassed and blocked from approaching the encampment by antisemitic  
20 activists, all with the assistance of UCLA security.”<sup>150</sup>

21 117. This Court correctly held that Defendant likely violated the Free Exercise  
22 Clause of the First Amendment. Judge Scarsi rejected UCLA’s argument that “it has no  
23 responsibility to protect the religious freedom of its Jewish students because the exclusion  
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25 <sup>147</sup> Ex. A at 24, 30

26 <sup>148</sup> *Id.* at 30.

27 <sup>149</sup> *See generally Frankel*, No. 2:24-cv-04702, Dkt. 1.

28 <sup>150</sup> *Id.* ¶ 16.

1 was engineered by third-party protesters”<sup>151</sup>—an argument that UCLA’s Task Force found  
2 “had the effect of reinforcing a perception of its bias against Jews and/or supporters of  
3 Israel and seemed to discount the equal protection of Jews at UCLA.” Indeed, because  
4 Jews and Israelis are disfavored minorities at UCLA, “[i]t is doubtful the University would  
5 make such an argument to rationalize discrimination against any other identity category  
6 protected by state or federal law.”<sup>152</sup>

7 118. On July 29, 2025, Judge Scarsi entered a permanent injunction against  
8 Defendant. That injunction provides that Defendant is enjoined from: “offering any of  
9 UCLA’s ordinarily available programs, activities, or campus areas to students, faculty,  
10 and/or staff if the Enjoined Parties know the ordinarily available programs, activities, or  
11 campus areas are not fully and equally accessible to Jewish students, faculty, and/or staff.”  
12 Defendant also is “prohibited from knowingly allowing or facilitating the exclusion of  
13 Jewish students, faculty, and/or staff from ordinarily available portions of UCLA’s  
14 programs, activities, and/or campus areas, whether as a result of a de-escalation strategy  
15 or otherwise.”<sup>153</sup>

16 119. The requested injunctive relief in this suit differs from and exceeds the relief  
17 in *Frankel*.

### 18 **G. The United States Investigates UCLA.**

19 120. UCLA is the recipient of many grants from the federal government. Since  
20 October 7, 2023, UCLA has received more than \$2.5 million from the Department of  
21 Justice alone.

22 121. These grants are legally binding contracts between UCLA and the United  
23 States. They include conditions requiring that UCLA comply with Title VI and its  
24 implementing regulations.

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25 <sup>151</sup> *Frankel*, 744 F. Supp. 3d at 1020.

26 <sup>152</sup> Ex. A at 67.

27 <sup>153</sup> *Frankel*, Dkt. 210 at 2-3.

1 122. As a condition of its receipt of federal financial assistance, UCLA signed a  
2 contract (Ex. C) requiring that all its programs and activities would be conducted in  
3 compliance with all requirements of Title VI and its implementing regulations.<sup>154</sup> See 28  
4 C.F.R. § 42.105. The contract contained assurances providing that UCLA would “comply  
5 with all applicable requirements of 28 C.F.R. Part 42.”<sup>155</sup> Part 42 provides that “[n]o  
6 person in the United States shall, on the ground of race ... or national origin be excluded  
7 from participation in, be denied the benefits of, or be otherwise subjected to discrimination  
8 under any program to which this subpart applies.” 28 C.F.R. § 42.104(a).

9 123. UCLA periodically signed certificates of its purported compliance with Title  
10 VI. One such certificate was signed on October 17, 2024.<sup>156</sup>

11 124. On May 9, 2025, the Department of Justice began investigating UCLA’s  
12 compliance with Title VI.

13 125. On July 29, 2025, the Department of Justice issued findings that UCLA is in  
14 violation of Title VI.<sup>157</sup>

15 126. The Department of Justice made two key factual findings. First, “Jewish and  
16 Israeli students at UCLA were subjected to severe, pervasive, and objectively offensive  
17 harassment that created a hostile environment by members of the encampment. Jewish  
18 and Israeli students were assaulted, verbally harassed, and physically prevented from  
19 accessing parts of UCLA’s campus on the basis of their actual or perceived race, religion,  
20 and/or national origin.”<sup>158</sup>. Second, “UCLA had actual notice that Jewish and Israeli  
21 students were subjected to severe, pervasive, and objectively offensive harassment that  
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23 <sup>154</sup> Office of Justice Programs, *UCLA Youth Justice Navigator Initiative Agreement* (Oct.  
24 17, 2024) (Ex. C).

25 <sup>155</sup> *Id.* at 8.

26 <sup>156</sup> *Id.*

27 <sup>157</sup> *See* Ex. B.

28 <sup>158</sup> *Id.* at 7.

1 created a hostile environment by members of the encampment. UCLA received at least  
2 **eleven** complaints alleging that demonstrators were discriminating against students on the  
3 basis of their race, religion and/or national origin during the time the encampment sat on  
4 Royce Quad.”<sup>159</sup> These complaints included reports that Jewish students were “prevented  
5 ... from accessing parts of the campus,” “unable to access the library because  
6 demonstrators would not give them a wristband,” “surrounded and detained ... and  
7 prevented ... from accessing Royce Quad,” and physically assaulted.<sup>160</sup>

8 127. The Department of Justice accordingly concluded that “UCLA was  
9 deliberately indifferent to the hostile environment for Jewish and Israeli students caused  
10 by the encampment.”<sup>161</sup> The Department of Justice negotiated with UCLA in good faith  
11 to attempt to bring UCLA into voluntary compliance with Title VI. The Department of  
12 Justice, along with other federal agencies, attempted to negotiate resolution of UCLA’s  
13 Title VI violations. The Department of Justice has determined that UCLA will not  
14 voluntarily comply with Title VI.

15 128. UCLA’s noncompliance with Title VI remains ongoing.

16 129. When the Department of Justice issued its findings letter in July 2025, UCLA  
17 had a practice of failing to enforce its time, place, and manner rules and of ignoring or  
18 refusing to take meaningful action to remedy discrimination complaints raised by Jewish  
19 and Israeli students. On information and belief, UCLA has not adopted policies requiring  
20 the EDI Office and other UCLA employees to promptly address and adequately resolve  
21 complaints of discrimination against Jews and Israelis. Nor has UCLA amended its  
22 policies to guarantee fair and robust enforcement of its time, place, and manner rules.

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26 <sup>159</sup> *Id.* at 7.

27 <sup>160</sup> *Id.* at 5,7.

28 <sup>161</sup> *Id.* at 8.

1 130. Notwithstanding the Department of Justice’s findings letter, UCLA still  
2 ignores complaints about antisemitic and anti-Israeli harassment and still refuses to  
3 enforce its own time, place, and manner rules.

4 131. For example, on October 7, 2025, dozens masked members of SJP called for  
5 an “intifada revolution.” Their conduct violated UCLA’s prohibition on wearing masks  
6 to conceal one’s identity with the intent of intimidating a person or group. The Jewish  
7 Faculty Resilience Group previously had warned Chancellor Julio Frenk that SJP  
8 “publicly called for a pro-Hamas rally and told all participants to wear masks” and asked  
9 him “to direct university officials to enforce all regulations *precisely* to avoid the type of  
10 situation that eventually unfolded.” However, Vice Chancellor for Campus Safety Steve  
11 Lurie, who was present at the demonstration, refused to enforce UCLA’s content-neutral  
12 mask ban.<sup>162</sup>

## 13 CLAIMS FOR RELIEF

### 14 COUNT I

#### 15 (Title VI)

16 132. The United States realleges and incorporates by references the allegations set  
17 forth in the foregoing paragraphs.

18 133. Title VI of the Civil Rights Act of 1964 provides, “No person in the United  
19 States shall, on the ground of race, color, or national origin, be excluded from participation  
20 in, be denied the benefits of, or be subjected to discrimination under any program or  
21 activity receiving Federal financial assistance.” 42 U.S.C. § 2000d.

22 134. Title VI prohibits discrimination based on national origin, including  
23 discrimination against Israelis or those perceived to be Israelis because of their actual or  
24 perceived national origin.

25 <sup>162</sup> Letter from Jewish Faculty Resilience Group to Chancellor Julio Frenk (Oct. 10, 2025),  
26 available at Jewish Faculty Resilience Group, *JFRG Advocacy: Countering Antisemitism*  
27 *at UCLA's Main Campus*, <https://tinyurl.com/yzanxryc>.

1 135. Title VI prohibits discrimination based on race, including discrimination  
2 against Jews or those perceived to be Jewish because of their ancestry.

3 136. Title VI prohibits discrimination that arises from a recipient of federal  
4 funding's deliberate indifference to a discriminatory hostile educational environment.

5 137. Jewish and Israeli students at UCLA have been subjected to severe,  
6 pervasive, and objectively offensive harassment and discrimination from October 7, 2023,  
7 through the present on account of their actual or perceived race or national origin.

8 138. This severe, pervasive, and objectively offensive harassment and  
9 discrimination effectively denied Jewish and Israeli students at UCLA equal access to the  
10 education institution's benefits, resources, and opportunities. For example, armed mobs  
11 specifically targeted Jewish and Israeli students from accessing buildings and prevented  
12 them from accessing outdoor spaces.

13 139. UCLA discriminated against Jewish and Israeli students via its deliberate  
14 indifference to the repeated and widespread hostile actions of campus agitators against  
15 Jewish and Israeli students. UCLA created a culture where antisemitism and anti-Israeli  
16 bias could and did thrive. UCLA was aware of the harassment and discrimination that  
17 occurred in its programs and activities, yet it deliberately refused to take action, or else,  
18 took actions clearly insufficient in light of the known circumstances.

19 **COUNT II**

20 **(Breach of Contract)**

21 140. The United States realleges and incorporates by reference the allegations set  
22 forth in the foregoing paragraphs.

23 141. At all times alleged in this Complaint, UCLA has received grants of federal  
24 funds from the United States, including from the Department of Justice.<sup>163</sup> These grants  
25 are legally binding contracts that require UCLA to comply with Title VI throughout the  
26 duration of the grants.

27 \_\_\_\_\_  
28 <sup>163</sup> See Ex. C.

1 142. UCLA has materially breached the terms of the grants by failing to comply  
2 with Title VI.

3 143. The United States has fulfilled all obligations owing to date under the grants.

4 144. Compliance with Title VI is a material term of the grants.

5 145. UCLA's failure to comply with Title VI is grounds for the United States to  
6 receive reimbursement for grant payments made during the period of noncompliance.

7 **PRAYER FOR RELIEF**

8 WHEREFORE, the United States respectfully requests this Court:

9 146. Declare that UCLA unlawfully has discriminated against Jewish and Israeli  
10 students at UCLA in violation of Title VI via its deliberate indifference to discriminatory  
11 harassment of Jewish and Israeli students and tolerance of a hostile educational  
12 environment since October 7, 2023, up to the present day;

13 147. Permanently enjoin UCLA, its officers, agents, employees, successors,  
14 assigns, and all persons in active concert or participation with them from unlawful  
15 discrimination against and harassment of Jewish and Israeli students, including through  
16 deliberate indifference to known hostile environments;

17 148. Order UCLA to take affirmative steps to ensure full and equal access to  
18 UCLA's educational opportunities and benefits for Jewish and Israeli students, including  
19 but not limited to:

20 a. Enforce existing content-neutral time, place, and manner restrictions for  
21 discriminatory protests and activities that interfere with Jewish and Israeli  
22 students' access to educational opportunities;

23 b. Enforce the existing University of California Anti-Discrimination Policy  
24 and related anti-bias policies against students, faculty, and staff who  
25 harass or discriminate against Jewish and Israeli students;

- 1 c. Impose timely and meaningful disciplinary consequences on students and
- 2 faculty who harass or discriminate against Jewish and Israeli students in
- 3 violation these policies;
- 4 d. Impose policies that require UCLA to seek help from and cooperate with
- 5 law enforcement in arresting protestors who unlawfully impede
- 6 movement through campus and occupy UCLA buildings and outdoor
- 7 spaces following orders to disperse;
- 8 e. Impose policies that require UCLA to promptly and meaningfully
- 9 investigate and resolve complaints of antisemitism and anti-Israeli bias;
- 10 f. Declare that Defendant is in material breach of its contracts and
- 11 assurances of compliance under Title VI;
- 12 g. Declare that, as a result of Defendant's material breach of contract, the
- 13 United States need not make any additional payments to UCLA otherwise
- 14 required by existing grants;
- 15 h. Rescind and award to the United States restitution of all grant payments
- 16 made to UCLA during the time of UCLA's noncompliance with Title VI;
- 17 i. Enjoin Defendant, its officers, agents, employees, successors, assigns, and
- 18 all persons in active concert or participation with them from entering into
- 19 federal contracts containing assurances of compliance with Title VI until
- 20 such time that the Court concludes UCLA is complying with Title VI;
- 21 j. Appoint an independent outside monitor, subject to approval and in
- 22 collaboration with the United States, to oversee and ensure UCLA's full
- 23 compliance with all injunctive and equitable relief ordered by the Court.
- 24 The monitor shall be empowered to audit UCLA, make report to the
- 25 United States and the Court, and recommend corrective actions for such
- 26 duration and scope as the Court deems just and necessary;
- 27
- 28

1 k. Award such other additional relief as justice may require, including but  
2 not limited to fees and taxable costs, to the maximum extent permitted by  
3 applicable law.  
4

5 Date: May 26, 2026

Respectfully submitted,

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