

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

MAYA PARIZER, ADIN GESS, NOACH
NEWMAN, NATALIE SANANDAJI, YONI
DILLER, DAVID BROMBERG, LIOR
BAR OR, ARIEL EIN-GAL, and HAGAR
ALMOG,

Plaintiffs,

v.

AJP EDUCATIONAL FOUNDATION,
INC. a/k/a AMERICAN MUSLIMS FOR
PALESTINE, NATIONAL STUDENTS
FOR JUSTICE IN PALESTINE, WESPAC
FOUNDATION, HATEM BAZIAN, OSAMA
ABUIRSHaid, TAHER HERZALLAH, and
ZAREFAH BAROUD,

Defendants.

Civil No. 1:24-cv-00724-RDA-IDD

**FIRST AMENDED COMPLAINT
FOR DAMAGES AND JURY TRIAL DEMAND**

Plaintiffs Maya Parizer, Adin Gess, Noach Newman, Natalie Sanandaji, Yoni Diller, David Bromberg, Lior Bar Or (“**U.S. Plaintiffs**” and with Israeli Plaintiffs, collectively “**Plaintiffs**”), Ariel Ein-Gal, and Hagar Almog (collectively, “**Israeli Plaintiffs**”), sue Defendants AJP Educational Foundation, Inc. a/k/a American Muslims for Palestine, National Students for Justice in Palestine, WESPAC Foundation, Hatem Bazian, Osama Abuirshaid, Taher Herzallah, and Zarefah Baroud (collectively, “**Defendants**”) and allege as follows:

INTRODUCTION

When someone tells you they are aiding and abetting terrorists—*believe them*.

Hamas is a United States designated Foreign Terrorist Organization (“**FTO**”) founded in 1987 with the express goal of destroying the State of Israel and murdering all Jews. Today,

Hamas's terrorist aims target not only Israel and the Jews but also the United States and Western values. As a core strategy in promoting its goals, Hamas seeks to prevent Israel from normalizing relationships with its Arab neighbors.

Hamas regularly employs a toolkit of well-known terrorist activities to further its objectives, including suicide bombings, rocket attacks, stabbings, kidnapping, hostage taking, and using civilians as human shields. Hamas supports its unrelenting terror with a well-organized and extremely well-funded propaganda machine that regularly spreads lies and foments chaos around the world. Within hours of its October 7 attack, Hamas unleashed its propaganda arsenal globally, spreading constant disinformation and instigating chaotic support globally, especially targeting the United States. As demonstrated below, Defendants are Hamas's propaganda and recruiting arm in the United States; they fulfilled their purpose and answered Hamas's call to action. One has only to look at the highly coordinated and devastating effects on American institutions of higher learning to see the fruits born of Hamas's rotten tree.

Defendant AJP Educational Foundation, Inc. a/k/a American Muslims for Palestine ("**AMP**")—directed by individual Defendants Osama Abuirshaid, Hatem Bazian, and Zarefah Baroud—is Hamas's propaganda division in the United States. AMP was founded from the ashes of disbanded organizations created by senior Hamas officials after those organizations and related individuals were exposed and found criminally and civilly liable for providing material support to Hamas and other affiliated terrorist groups.

In 2010, AMP expanded its operation to American college campuses when it founded Defendant National Students for Justice in Palestine ("**NSJP**") to manage and control hundreds of Students for Justice in Palestine ("**SJP**") chapters across the country. Through NSJP, AMP uses propaganda to intimidate, convince, and recruit uninformed, misguided, and impressionable

college students who, wittingly or unwittingly, serve as foot soldiers for Hamas on campus and beyond.

While Defendant AMP directs and controls Defendant NSJP as a practical matter, Defendant WESPAC Foundation (“**WESPAC**”), a New York-based non-profit corporation, fiscally sponsors NSJP, providing NSJP with the financial wherewithal to carry out its illicit activities.

On October 8, *the day after* Hamas’s terrorist attack, AMP and NSJP, funded by WESPAC, were prepared and responded to Hamas’s “call for mass mobilization” by disseminating a manifesto and plan of attack (“**NSJP Toolkit**”) which includes materials that were created before the attack. In the NSJP Toolkit, AMP and NSJP identify themselves as “PART of” a “Unity Intifada,” governed by Hamas’s “unified command” of terrorist operations in Gaza. As part of Hamas’s movement, AMP and NSJP state that they seek “liberation,” a “real process that requires confrontation by any means necessary,” including “armed struggle” and other acts of violence. “All [resistance] is legitimate, and all of it is necessary.” AMP and NSJP could not be clearer: they answer to, are a part of, and aid, abet, and systematically support Hamas and its affiliates’ global terrorist network. They do not merely lend their voices Hamas’s acts of international terrorist campaign; they intentionally engage in numerous acts of violence and other illegal activity on behalf of Hamas in the United States. Indeed, one of Hamas’s fiscal sponsors, the Islamic Republic of Iran, has declared NSJP a “branch of” the terrorist network.

AMP and NSJP enacted the NSJP Toolkit as written and beset their army of agitators on American streets and college campuses. Through threats, violence, calls for “globalizing” the Intifada, and illegally occupying college campuses across the country, AMP and NSJP have

instigated a mass culture of fear, threats, violence, and overt hatred to intimidate politicians and institutions to “force” American institutions to bend to Hamas’s will.

There is a legal chasm between independent advocacy and knowingly serving as the propaganda and recruiting wing of a Foreign Terrorist Organization in the United States. Defendants engage in the latter. These are not mere independent advocates; they are recruiters and propagandists for international terrorist organizations and nation-state proxies operating in plain sight throughout the United States. Knowingly providing such services—especially in such an ongoing, systematic fashion—violates the Antiterrorism Act.

Plaintiffs are survivors of Hamas’s October 7 terrorist attack, family members of those murdered by Hamas, civilians still under fire from Hamas’s ongoing terrorism, and persons displaced by Hamas’s ongoing terrorism. They have been, and continue to be, injured by Defendants’ intentional, systematic, and substantial assistance to Hamas’s acts of international terrorism. Defendants, as instrumental and systematic components of Hamas’s international terrorist network, are liable for Plaintiffs’ resulting damages.

PLAINTIFFS

1. Plaintiff Maya Parizer (“**Ms. Parizer**”) is a United States citizen. On October 7, Ms. Parizer and her boyfriend survived Hamas’s terrorist attack at the Nova Festival, fleeing by car and dodging Hamas gunfire as they weaved through dead bodies on the roads. Consequently, Ms. Parizer suffered, and continues to suffer, mental anguish and pain and suffering made worse by Defendants’ provision of material support to her attackers.

2. Plaintiff Adin Gess (“**Mr. Gess**”) is a United States citizen. On October 7, his home on Kibbutz Holit was attacked. While Mr. Gess was not home, through a communal WhatsApp group chat, he witnessed his friends and community members brutally murdered after pleading for

their lives. Mr. Gess was forced to evacuate his property and, because of Hamas's ongoing targeting of Israeli civilians, has been unable to return home. Consequently, Mr. Gess lost his home, belongings, community, and way of life. He also suffered, and continues to suffer, mental anguish and pain and suffering, made worse by Defendants' provision of material support to his attackers.

3. Plaintiff Noach Newman ("**Mr. Newman**") is a United States citizen. On October 7, Mr. Newman's brother, David Yair Shalom Newman, also a U.S. citizen, was murdered when Hamas terrorists stormed the Nova Festival, indiscriminately butchering civilians. Consequently, Mr. Newman and his family suffered, and continue to suffer, unbearable trauma, mental anguish, and pain and suffering made worse by Defendants' provision of material support to his attackers.

4. Plaintiff Natalie Sanandaji ("**Ms. Sanandaji**") is a United States citizen and resident. On October 7, Ms. Sanandaji survived Hamas's attacks at the Nova Festival and, after fleeing by car and on foot through Hamas gunfire for several hours, miraculously survived. Consequently, Ms. Sanandaji suffered, and continues to suffer, mental anguish and pain and suffering, made worse by Defendants' provision of material support to her attackers.

5. Plaintiff Yoni Diller ("**Mr. Diller**") is a United States citizen. On October 7, Mr. Diller survived Hamas's terrorist attack at the Nova Festival but witnessed the massacre of countless festival goers, including four of his close friends. Consequently, Mr. Diller suffered, and continues to suffer, mental anguish and pain and suffering, made worse by Defendants' provision of material support to the very attackers who killed his friends.

6. Plaintiff David Bromberg ("**Mr. Bromberg**") is a United States citizen. On October 7, Mr. Bromberg survived Hamas's terrorist attack at the Nova Festival, fleeing and subsequently hiding in the bushes outside Kibbutz Be'eri for more than twelve hours until he was rescued. Mr.

Bromberg's friends were murdered, and one is held hostage by Hamas. Consequently, Mr. Bromberg suffered, and continues to suffer, mental anguish and pain and suffering made worse by Defendants' provision of material support to his attackers.

7. Plaintiff Lior Bar Or ("**Mr. Bar Or**") is a United States citizen. On October 7, Mr. Bar Or survived Hamas's terrorist attack at the Nova Festival, evading gunfire and hand grenades and escaping after Hamas set fire to the shelter he was hiding inside. Four of Mr. Bar Or's friends were murdered. Consequently, Mr. Bar Or suffered, and continues to suffer, mental anguish and pain and suffering made worse by Defendants' provision of material support to his attackers.

8. Plaintiff Ariel Ein-Gal ("**Mr. Ein-Gal**") is an Israeli citizen. On October 7, Mr. Ein-Gal and his friends were asleep on Zikim Beach when they were awoken by Hamas terrorists infiltrating the Israeli coast. Mr. Ein-Gal was forced to flee under Hamas gunfire and hide for four hours. When he tried to escape, Hamas terrorists fired dozens of rounds at him, but he narrowly survived. Consequently, Mr. Ein-Gal suffered mental anguish and pain and suffering, made worse by Defendants' provision of material support to his attackers.

9. Plaintiff Hagar Almog ("**Ms. Almog**") is an Israeli citizen. On October 7, her home on Kibbutz Holit was attacked. While Ms. Almog and her family were not home, through a communal WhatsApp group chat, they witnessed their friends and community members brutally murdered after pleading for their lives. Ms. Almog was forced to evacuate her property and, because of Hamas's ongoing targeting of Israeli civilians, has been unable to return home. Consequently, Ms. Almog has lost her home, belongings, community, and way of life. She also suffered, and continues to suffer, mental anguish and pain and suffering, made worse by Defendants' provision of material support to her attackers.

DEFENDANTS

10. Defendant AJP Educational Foundation, Inc. a/k/a American Muslims for Palestine (“AMP”) is a 501(c)(3) non-profit corporation incorporated in California with its principal place of business in Falls Church, Virginia. In a separate action, AMP is accused of being the successor entity to two organizations currently dodging a judgment exceeding \$150 million under the Antiterrorism Act for providing material support to Hamas.¹

11. Defendant National Students for Justice in Palestine (“NSJP”) is an unincorporated association without a formal principal place of business or publicly identified leadership structure. NSJP was founded by AMP to provide it on-campus management and control of hundreds of university chapters of Students for Justice in Palestine (“SJP”). AMP controls NSJP and uses it to operate a propaganda machine for Hamas and its affiliates across American college campuses.

12. Defendant WESPAC Foundation (“WESPAC”)—short for Westchester People’s Action Coalition—is a 501(c)(3) non-profit corporation incorporated in New York with its principal place of business in White Plains, New York. WESPAC is the fiscal sponsor of Defendant NSJP.

13. Individual Defendant Hatem Bazian founded both AMP and NSJP. He is currently the Principal Officer of AMP and Chairman of AMP’s National Board. Mr. Bazian is responsible, in whole or in part, for directing AMP’s ideological efforts for the benefit of Hamas and its allies. Mr. Bazian is also involved in managing AMP’s relationship with its donors.

14. Individual Defendant Osama Abuirshaid is the Executive Director of AMP and a member of AMP’s National Board. He is intimately involved in the operations of AMP.

¹ See First Amended Complaint, *Boim v. Am. Muslims for Palestine*, No. 1:17-CV-3591 (N.D. Ill. Dec. 17, 2019), ECF 179 (henceforth, “**Boim FAC**”). That matter is ongoing. See also *Boim v. Am. Muslims for Palestine*, 9 F.4th 545 (7th Cir. 2021).

15. Individual Defendant Zarefah Baroud serves as the Digital Media Associate of AMP, producing propaganda for later dissemination among SJP chapters. Ms. Baroud’s father is Ramzy Baroud, a scholar at the Center for Islamic and Global Affairs (“CIGA”), a Turkish “think tank” that hosts conferences attended by Hamas and Muslim Brotherhood leadership. Mr. Baroud is also the Editor-in-Chief of *The Palestine Chronicle*, a newspaper controlled by a U.S.-based nonprofit that employed a Hamas operative caught holding three Israeli hostages. Defendant resides with her father in Seattle.

JURISDICTION AND VENUE

16. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1350.

17. This Court has personal jurisdiction under 18 U.S.C. §§ 2333(a) and 2334.

18. Venue is proper in this Court under 18 U.S.C. § 2334(a), which permits claims under the Antiterrorism Act to be brought “in the district court ... for any district where any plaintiff resides or where any defendant resides,” because AMP’s principal place of business is in Falls Church, Virginia, within the Eastern District of Virginia. AMP was also served at its principal place of business.

FACTUAL ALLEGATIONS

A. INTRODUCTION TO HAMAS

19. In 1987, after starting the “First Intifada”—a murderous string of terrorist attacks directed at both innocent civilians and Israeli soldiers alike—the International Muslim Brotherhood’s Gaza branch splintered into a new terrorist group: Hamas.² Hamas rejects Israel’s right to exist and secular Arab nationalism. Instead, it engages in terrorism—“jihad”—to destroy

² Kali Robinson, *What is Hamas?*, COUNCIL ON FOREIGN RELATIONS (last updated Apr. 28, 2024), <https://www.cfr.org/backgrounder/what-hamas>.

the State of Israel and implement an Islamist state controlled by Sharia Law “from the [Jordan] River to the [Mediterranean] Sea.”³

20. Hamas was designated an FTO on October 8, 1997, by the U.S. State Department, and its status was reaffirmed in 1999 and 2001.⁴

21. Hamas considers its own people expendable and uses noncombatants as human shields. In Hamas’s eyes, this tactic results in a win/win scenario: Either Israel sees the risk to noncombatants as too significant and allows Hamas to engage in ongoing terrorist attacks against Israel’s own civilians, or Israel deems the risk to its own people too great, and Hamas can accuse Israel of killing noncombatants.⁵

22. Hamas relies on terrorism, propoganda, and falsehoods to demonize Israel and cast itself as opposing a mythical “settler-colonial” oppressor image of Israel, conjuring a false historical narrative that Israel is a colonizer that has oppressed the Palestinian people. Hamas also conveniently ignores the actual events of the recent past in which Israel ceded the Palestinians the Gaza Strip, which it won in the 6-day war in 1967. In doing so, it became one of the only nations in memory to cede land won in a war to establish peace. It has done so again multiple times, including in 2005, when Israel unilaterally withdrew from the Gaza Strip.

³ AMERICAN JEWISH COMMITTEE, “FROM THE RIVER TO THE SEA” (last visited Apr. 29, 2024), <https://www.ajc.org/translatehate/From-the-River-to-the-Sea>; ANTI-DEFAMATION LEAGUE, SLOGAN: “FROM THE RIVER TO THE SEA PALESTINE WILL BE FREE” (Oct. 26, 2023), <https://www.adl.org/resources/backgrounders/slogan-river-sea-palestine-will-be-free>.

⁴ See CRS REPORT FOR CONGRESS, FOREIGN TERRORIST ORGANIZATIONS 27-30 (Feb. 6, 2004), <https://irp.fas.org/crs/RL32223.pdf>.

⁵ See, e.g., Natalie Ecanow, *Hamas Officials Admit its Strategy is to Use Palestinian Civilians as Human Shields*, N.Y. POST (Nov. 1, 2023), <https://nypost.com/2023/11/01/opinion/hamas-officials-admit-its-strategy-is-to-use-palestinian-civilians-as-human-shields/>; Michael D. Shear, *U.S. Says Hamas Operates Out of Gaza Hospitals, Endorsing Israel’s Allegations*, N.Y. TIMES (Nov. 14, 2023).

23. Today, Hamas is largely funded, trained, and controlled by the Islamic Republic of Iran's Islamic Revolutionary Guard Corps (“**IRGC**”), another FTO. Hamas and the IRGC share the common goal of destroying Israel and the United States. The IRGC directly enabled Hamas's October 7 terrorist attack by funding, training, and equipping Hamas and Palestine Islamic Jihad and by assisting in the preparation and organizing of the attacks.⁶

24. Hamas receives billions in aid from its cohorts and sympathizers throughout the world. While ordinary Gazans live in poverty, Hamas and its leaders steal aid to fund Hamas's terrorist operations and bankroll its leaders' lavish lifestyles outside the Gaza Strip where they do not need to live with, or face, the consequences of operating their terror machine behind human shields, including noncombatant women and children.

B. THE ORIGINAL MATERIAL SUPPORT ENTERPRISE⁷

25. In 1988, the Muslim Brotherhood and Hamas founded the “Palestine Committee”—a small network of organizations with no regard for the corporate form or legal requirements—to serve as Hamas's terrorist funding and support enterprise in the United States.⁸ The Palestine Committee directly coordinated with Hamas to help achieve its goals in the United States. For example, in 1993, the FBI wiretapped a meeting between the Palestine Committee and Hamas operatives in the United States that

⁶ Matthew Levitt, *The Hamas-Iran Relationship*, THE WASHINGTON INSTITUTE FOR NEAR EAST POLICY (Nov. 2023), <https://www.washingtoninstitute.org/policy-analysis/hamas-iran-relationship>; Summer Said et al., *Iran Helped Plot Attack on Israel Over Several Weeks*, WALL ST. J. (Oct. 8, 2023), <https://www.wsj.com/world/middle-east/iran-israel-hamas-strike-planning-bbe07b25>.

⁷ Unless otherwise stated, many of the allegations in this section are related to the allegations in *Boim* FAC, *supra* note 1, which the Seventh Circuit has already concluded states a plausible and actionable claim for relief based on the theory that AMP is an alter ego for the original material support enterprise described below. *See Boim*, 9 F.4th 545.

⁸ Lorenzo Vidino, *The Hamas Networks in America: A Short History*, GW PROGRAM ON EXTREMISM, at 5, 7–8 (Oct. 2023), <https://extremism.gwu.edu/sites/g/files/zaxdzs5746/files/2023-10/hamas-networks-final.pdf>.

show[s] internal discussions on how to improve activities in support of Hamas within the US and how to shield them from the designation of Hamas as a terrorist organization. US-based Hamas activists agreed that hiding their affiliation and intentions was the best tactic to avoid negative consequences. ***“I swear by Allah that war is deception,” said one senior leader, “[d]eceive, camouflage, pretend that you’re leaving while you’re walking that way. Deceive your enemy.”*** “Let’s not hoist a large Islamic flag and let’s not be barbaric-talking. We will remain a front so that if the thing [the U.S. government ban on Hamas] happens, we will benefit from the new happenings instead of having all of our organizations classified and exposed.”⁹

26. The wiretapped meeting centered around the Palestine Committee’s assurance to Hamas that, following the Oslo Accords, it remained committed to promoting Hamas’s goal of derailing Israel’s normalization and peace efforts by assisting on all fronts: “financial, information[al], [and] political.”¹⁰

27. The Palestine Committee consisted of several organizations. The most relevant here are the Holy Land Foundation for Relief and Development (“**HLF**”), the Islamic Association for Palestine (“**IAP**”), and IAP’s many alter egos, including the American Muslim Society (“**AMS**”). HLF served as Hamas’s fundraising arm in the United States. IAP’s “primary function was to serve as the public voice of Hamas in the United States.”¹¹ AMS was originally incorporated as a separate organization, but merged with IAP and operated as one of its many alter egos.¹²

28. HLF and IAP were both founded and controlled by members of Hamas’s senior leadership. For example, IAP was founded by Khaled Mashal (“**Mashal**”), the former head of Hamas’s Political Bureau until 2017 and current leader of Hamas’s diaspora office. IAP also was heavily financed by Mousa abu Marzook (a/k/a Abu Omar, Abu Umar, Abu Rizq) (“**Marzook**”),

⁹*Id.* at 5 (emphasis in original).

¹⁰ *Boim* FAC, *supra* note 1, at ¶ 38.

¹¹ MATTHEW LEVITT, *HAMAS: POLITICS, CHARITY, AND TERRORISM IN THE SERVICE OF JIHAD* 151 (2006).

¹² *See, e.g., Am. Muslims for Palestine*, 9 F.4th at 548 (recognizing, as several courts have previously determined before, that IAP “also went by the name ‘American Muslim Society’”).

a “Specially Designated Global Terrorist.”¹³ Mr. Mashal described IAP as one of the “first pillars” of Hamas’s terrorist organization.¹⁴

29. HLF and IAP were not simply founded by Hamas and left to their own devices. Instead, they actively fundraised for Hamas and directly collaborated with them on public relations strategies to promote Hamas’s efforts. HLF, IAP, and their affiliate organizations were ultimately discovered: their complicity in Hamas’s terror regime was exposed, and they (and related individuals) were found criminally and civilly liable for their actions.

30. In 2001, the United States Office of Foreign Asset Control designated HLF a “Specially Designated Global Terrorist.”¹⁵ In 2008, HLF and five of its leaders were convicted of providing material support to Hamas. The five leaders were then sentenced to prison.¹⁶

31. In December 2004, after IAP and AMS were found civilly liable for providing material support to Hamas through their propaganda efforts, IAP (and AMS as its alter ego) dissolved.¹⁷ IAP had fundraised on behalf of HLF—evidence presented at the HLF trial indicated that “numerous donation checks...made payable to...IAP” were “deposited into HLF’s bank account,” in certain instances with the memo line, “for Palestinian Mujahidden [martyrs] only.”¹⁸

¹³ OFFICE OF FOREIGN ASSET CONTROL, SANCTIONS LIST SEARCH: MOUSA ABU MARZOOK A/K/A ABU OMAR, ABU UMAR, ABU RIZQ), <https://sanctionssearch.ofac.treas.gov/Details.aspx?id=3754>.

¹⁴ *Boim* FAC, *supra* note 1, at ¶ 28; *see also* Garry M. Servold, *The Muslim Brotherhood and Islamic Radicalism*, in *KNOW THY ENEMY: PROFILES OF ADVERSARY LEADERS AND THEIR STRATEGIC CULTURES* 61–62 (Barry R. Schneider & Jerrold M. Post eds., 2003), <https://www.airuniversity.af.edu/Portals/10/CSDS/Books/knowthyenemy3.pdf>.

¹⁵ OFFICE OF FOREIGN ASSET CONTROL, SANCTIONS LIST SEARCH: HOLY LAND FOUNDATION FOR RELIEF AND DEVELOPMENT, <https://sanctionssearch.ofac.treas.gov/Details.aspx?id=7116>.

¹⁶ *See* Press Release, U.S. Dep’t of Justice, Federal Judge Hands Down Sentences in Holy Land Foundation Case (Mar. 27, 2009), <https://www.justice.gov/opa/pr/federal-judge-hands-downs-sentences-holy-land-foundation-case>.

¹⁷ *See Boim v. Holy Land Found. for Relief & Dev.*, 549 F.3d 685, 701 (7th Cir. 2008).

¹⁸ From Ivory Towers to Dark Corners: Investigating the Nexus between Antisemitism, Tax-Exempt Universities, and Terror Financing: Hearing before the House Committee on Ways and

32. This pattern repeated itself over and over. For example, KindHearts for Charitable Humanitarian Development, Inc. (“**KindHearts**”), an organization founded by Hamas and the Muslim Brotherhood, also was disbanded following a settlement agreement with the U.S. Treasury Department because it provided material support to Hamas.

C. AMP AND ITS ALTER EGOS: THE REBRANDED MATERIAL SUPPORT ENTERPRISE

33. Shortly after the original material support enterprise for Hamas—including IAP, HLF, and KindHearts—was exposed and many of its organizations were shut down, its architects worked to resurrect the enterprise in a way that would more effectively hide their actions. In 2006, several of the original enterprise’s key members founded AMP to fill the gap left by the loss of IAP. That is, to—once again—provide Hamas with an effective propaganda and recruiting arm in the United States.

34. There is “significant overlap between AMP and people who worked for or on behalf of organizations that were designated, dissolved, or held civilly liable by federal authorities for supporting Hamas.”¹⁹ Indeed, six members of AMP’s core leadership were IAP board members or active in HLF and/or IAP, two are family members of IAP board members, and one was a frequent collaborator and fundraiser for IAP and KindHearts.²⁰ Many of its staff are similarly holdovers from that enterprise.

Means, 118 Cong. (2023), at 8 [henceforth, “**Schanzer 2023 Congressional Testimony**”], <https://gop-waysandmeans.house.gov/wp-content/uploads/2023/11/Schanzer-Testimony.pdf>.

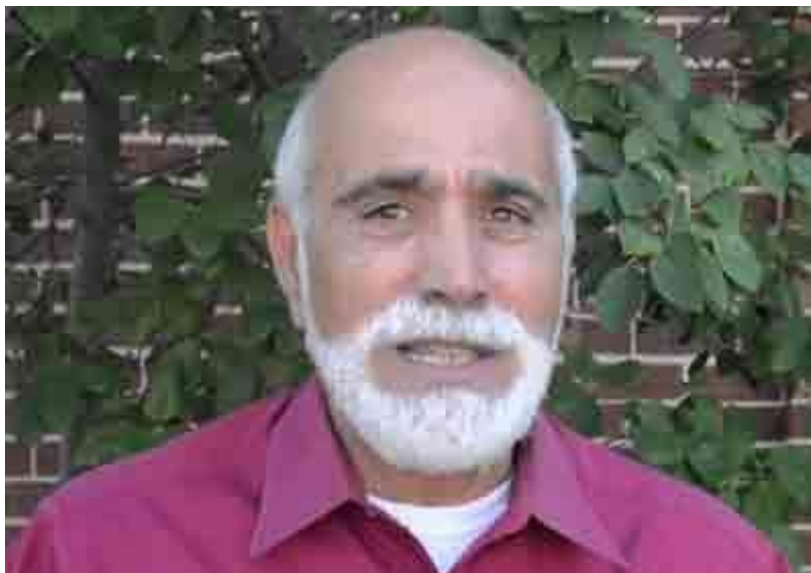
¹⁹ Israel Imperiled: Threats to the Jewish State: Joint Hearing before the Subcomm. on Terrorism, Nonproliferation, and Trade & the Subcomm. on the Middle East and North Africa, 114 Cong. 156 (2016) (Statement of Jonathan Schanzer) [henceforth, “**Schanzer 2016 Congressional Testimony**”], <https://docs.house.gov/meetings/FA/FA18/20160419/104817/HHRG-114-FA18-Wstate-SchanzerJ-20160419.pdf?ref=stanfordreview.org>.

²⁰ See generally Schanzer 2023 Congressional Testimony; Schanzer 2016 Congressional Testimony at 8; see also *Boim* FAC, *supra* note 1, at ¶ 78.

i. *Palestine Committee Alumni at AMP*

35. AMP is not a collection of young idealists. Rather, it is a collection of well-practiced adults who have, for decades, dedicated their lives to promoting the interests of international terrorist organizations and nation-state proxies in the United States. While these individuals have adopted AMP as their new corporate form, there can be no doubt that they retain the same mission they always have: to provide ongoing, systematic, material support to Hamas and its allies. The table below crystallizes the degree to which AMP is simply a continuation of the original enterprise.

AMP Core Founding Leadership	Prior Relationships to Palestine Committee
Hatem Bazian (Founder and Current Chairman of AMP National Board)	Speaker and Fundraiser
Osama Abuirshaid (Former Chief Spokesperson, Current Executive Director, and Member of the AMP National Board)	Former Board Member of IAP/AMS
Abdelbasset Hamayel (Former De Facto Executive Director)	Former Board Member of IAP/AMS
Munjed Ahmad (Current Member of the AMP National Board)	Former Board Member of IAP/AMS
Salah Sarsour (Current Member of the AMP National Board)	Former Active Member of IAP
Yousef Shahin	Former Active Member of IAP/AMS and HLF and the brother and business partner of Imad Sarsour, a former IAP Board Member
Hussein al-Khatib	Former Board Member of IAP/AMS and Former President of IAP New Jersey
Sanaa Daoud	Former Active Member of IAP/AMS and HLF
Rafeeq Jaber (Advisor, Tax Preparer, and Frequent Speaker)	In-law of Salah Daoud, a former IAP Board Member who fled the United States when IAP was shutting down and HLF was being criminally prosecuted.
Kifa Mustapha (Frequent Speaker and Promoter)	Former President and Board Member of IAP/AMS



Rafeeq Jaber

36. Rafeeq Jaber is the former president of IAP,²¹ the “spiritual father” or *eminence grise* of the IAP-AMP family of Hamas support entities,²² and AMP’s financial advisor and tax preparer. He led IAP, an organization found to have materially supported Hamas, while it illegally laundered millions of dollars for Hamas. In 2001, Mr. Jaber publicly acknowledged that, under his leadership, he directed IAP to galvanize support for Hamas and Marzook.²³ He also has previously voluntarily drawn equivalencies between IAP and AMP.²⁴ Despite not being identified as an AMP board member, he is regularly involved in major board-level decisions at AMP.²⁵

²¹ *Boim v. Quranic Literacy Institute*, 00-CV-2905, “Deposition of Rafeeq Jaber,” 10-12 (N.D. Ill April 9, 2003).

²² “مئات الآلاف في شوارع غزة تصنع تيكيرملاً ندملاً عراوش في فلالاً تائم” [Hundreds of thousands in the streets of American cities supporting Gaza],” Maan (Palestinian Authority), August 11, 2014. (<https://www.maannews.net/news/719809.html>); *Boim* FAC, ¶¶ 115-119.

²³ *Boim* FAC, ¶ 49.

²⁴ *Boim* FAC, ¶ 118.

²⁵ *Boim* FAC, ¶¶ 115-119.



Abdelbasset Hamayel

37. Abdelbasset Hamayel previously served as IAP’s secretary general. After IAP closed, he began working for KindHearts until its funds were frozen. He started working for AMP in 2008, serving as its *de facto* executive director and was instrumental in “help[ing] the organization (AMP) start functioning.”²⁶ AMP Board Members refer to Mr. Hamayel as AMP’s “director of operations.”²⁷

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²⁶ *Boim* FAC, at ¶ 75.

²⁷ *Boim* FAC, ¶ 121.



Osama Abuirshaid

38. Osama Abuirshaid is the Executive Director of AMP and a member of AMP's National Board. He previously served on the board of IAP and was the editor of IAP's bi-weekly newspaper. Mr. Abuirshaid specializes in creating and publishing propaganda for Hamas and its allies. He has interviewed Hamas leadership²⁸ and been featured on the website of al-Qassam Brigades, the self-declared military wing of Hamas.²⁹

39. Mr. Abuirshaid also regularly travels to Turkey, where he meets with Sami Al-Arian, who was convicted in the United States in 2006 for providing material support to Palestinian Islamic Jihad, another terrorist group operating in Gaza.³⁰ These events are hosted by CIGA, which Mr. Al-Arian founded, and where his colleague Ms. Baroud's father is a "scholar." Meanwhile,

²⁸ Osama Abuirshaid, *The Dialectic of Religion and Politics in Hamas's Thought and Practice* (March 22, 2013) (Ph.D. thesis, Loughboro University).

²⁹ Osama Abuirshaid, "فوز غة تمواقمب نوركميد برء" [Arabs are plotting the Gaza resistance," AL-QASSAM (Palestinian Authority), July 19, 2014. (Archived version available at <https://www.alqassam.ps/arabic/> - ماسقلا -ت لاقم ؤز غة -تمواقمب -نوركميد - (ب ر ء / 4746).

³⁰ See @JSchanzer, X (formerly Twitter) (May 5, 2024, 10:04 AM), <https://x.com/JSchanzer/status/1787121140311171531>; Press Release, U.S. Dep't of Justice, Sami Al-Arian Pleads Guilty To Conspiracy To Provide Services To Palestinian Islamic Jihad (Apr. 17, 2006), https://www.justice.gov/archive/opa/pr/2006/April/06_crm_221.html.

Mr. Al-Arian's daughter previously worked as AMP's Media and Communications Coordinator,³¹ a role now filled by Mr. Baroud's daughter.

40. In 2021, Mr. Abuirshaid spoke at a conference in Jordan titled "Towards the Features of a New Arab Strategy to Deal with the Arab-Israel Conflict," where he sat on a panel with PFLP convicted airplane hijacker Leila Khaled.³² The speaker lineup also included Mr. Al-Arian, Sami Khater (a co-founder of Hamas), and Hamas senior official Mohammad Nazzal.³³

41. Mr. Abuirshaid publicly supports Hamas and the Muslim Brotherhood and frequently promote Hamas and its affiliates' terrorist goals in Arab media by opposing Arab-Israeli normalization efforts, castigating Jews, and spreading antisemitic conspiracy theories.³⁴

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³¹ *Leena Al-Arian*, PALESTINE CONVENTION [2018], <https://palestineconvention.org/amp2018/speaker/leena-al-arian/> (last visited July 7, 2024).

³² *Head of Palestinian American lobby group joins conference with terror-group members*, JEWISH NEWS SYNDICATE (Dec. 3, 2021), <https://www.jns.org/head-of-palestinian-american-lobby-group-joins-conference-with-terror-group-members/>.

³³ *Id.*

³⁴ *See, e.g., id.*



Hatem Bazian

42. Hatem Bazian is AMP’s founder and current Chairman of AMP’s National Board. As an undergraduate, Mr. Bazian was a member of two Muslim Brotherhood-affiliated organizations, the General Union of Palestine Studies (“GUPS”) and the Muslim Students Association (“MSA”). Then, as a professor at the University of California at Berkeley, he founded the first chapter of Students for Justice in Palestine (“SJP”).³⁵ Mr. Bazian created SJP in the image of GUPS and MSA. Mr. Bazian frequently collaborated with IAP and fundraised for KindHearts.

43. Mr. Bazian, chillingly, believes “[i]t is about time we have an intifada in [the United States]”³⁶ and declared, “The ‘Jewish nation’ is the central myth of Zionism. It needs to be dismantled.”³⁷ In that same vein, Defendant Bazian supports convicted terrorists, including (1) Marwan Barghouti, who murdered five Israelis during the Second Intifada and financed the Sbarro

³⁵ Eitan Fischberger, *The Long March of Radicalization*, CITY JOURNAL (Oct. 16, 2023), <https://www.city-journal.org/article/the-long-march-of-radicalization>; Daniel Mael, *On Many Campuses, Hate is Spelled SJP*, THE TOWER (Oct. 2014), <https://www.thetower.org/article/on-many-campuses-hate-is-spelled-sjp/>.

³⁶ Hamas on Campus, *Radical Hatem Bazian calls for Intifada (armed uprising) in the USA!!*, YOUTUBE (Mar. 23, 2015), <https://www.youtube.com/watch?v=Mfv5yaKxNgo>.

³⁷ @Hatembazian, X (formerly Twitter) (Apr. 19, 2018, 9:57 AM), <https://x.com/Hatembazian/status/986966906040041472>.

Café massacre in which 15 Israelis died and more than 130 were injured, and (2) Rasma Odeh, who was convicted of placing two bombs at a Jerusalem supermarket in 1969 and killing two people.



Salah Sarsour

44. Salah Sarsour was an active member of IAP, chaired the convention where AMP was officially formed, and currently sits on AMP's National Board. In 1994, he was arrested and imprisoned in Israel for engaging in activities supporting Hamas after he was caught sheltering and providing a weapon to a Hamas terrorist.³⁸ Sarsour chaired AMP's 2023 Palestine Convention.³⁹

³⁸ *Boim* FAC, ¶¶ 132-134.

³⁹ American Muslims for Palestine (@ampalastine) and Palestine Convention (@palestineconvention), INSTAGRAM, <https://www.instagram.com/ampalastine/reel/Cz-eUiYA-qi/> (Nov. 22, 2023).

ii. *AMP Abandons its Attempts to Appear Legitimate*

45. In some ways, AMP, unlike the prior iteration of the material support enterprise, is more cunning and purposeful when following the corporate form and attempting to evade legal guardrails. For example, at its 2014 annual conference, AMP hosted a discussion on “navigat[ing] the fine line between legal activism and material support for terrorism.”⁴⁰

46. But whatever attempts AMP made in the past to hide its actions have, as described below, been abandoned and replaced with openly providing propaganda services for Hamas through its campus arm, NSJP. Just last November, AMP held its annual conference, which featured a “Youth Program” that included an “SJP Workshop.” The conference also included separate programming *specifically for students* referred to as the “Campus Activism Track,” designed to increase “solidarity between SJP chapters.”⁴¹

47. Ms. Baroud, under the leadership of Abuirshaid and Bazian, oversees AMP’s copious social media activity and assists NSJP in the same. Defendant Herzallah, as the liaison between AMP and NSJP, ensures that the propaganda is properly utilized by the various SJP chapters.

48. AMP is, in all material respects, a reincarnation of IAP and AMS. It continues to operate with the same core people, taking ultimate orders and directions from the same FTOs and nation-state proxies, and endeavors to achieve the same goal: materially support Hamas and its allies by acting as their propaganda and recruiting division in the United States.

49. It is not a coincidence that Hamas official Ali Barakesh *on October 9, 2023*, announced that one of the objectives of the October 7 terror attacks was to demand the release of

⁴⁰ Schanzer 2016 Congressional Testimony, *supra* note 20, at 8.

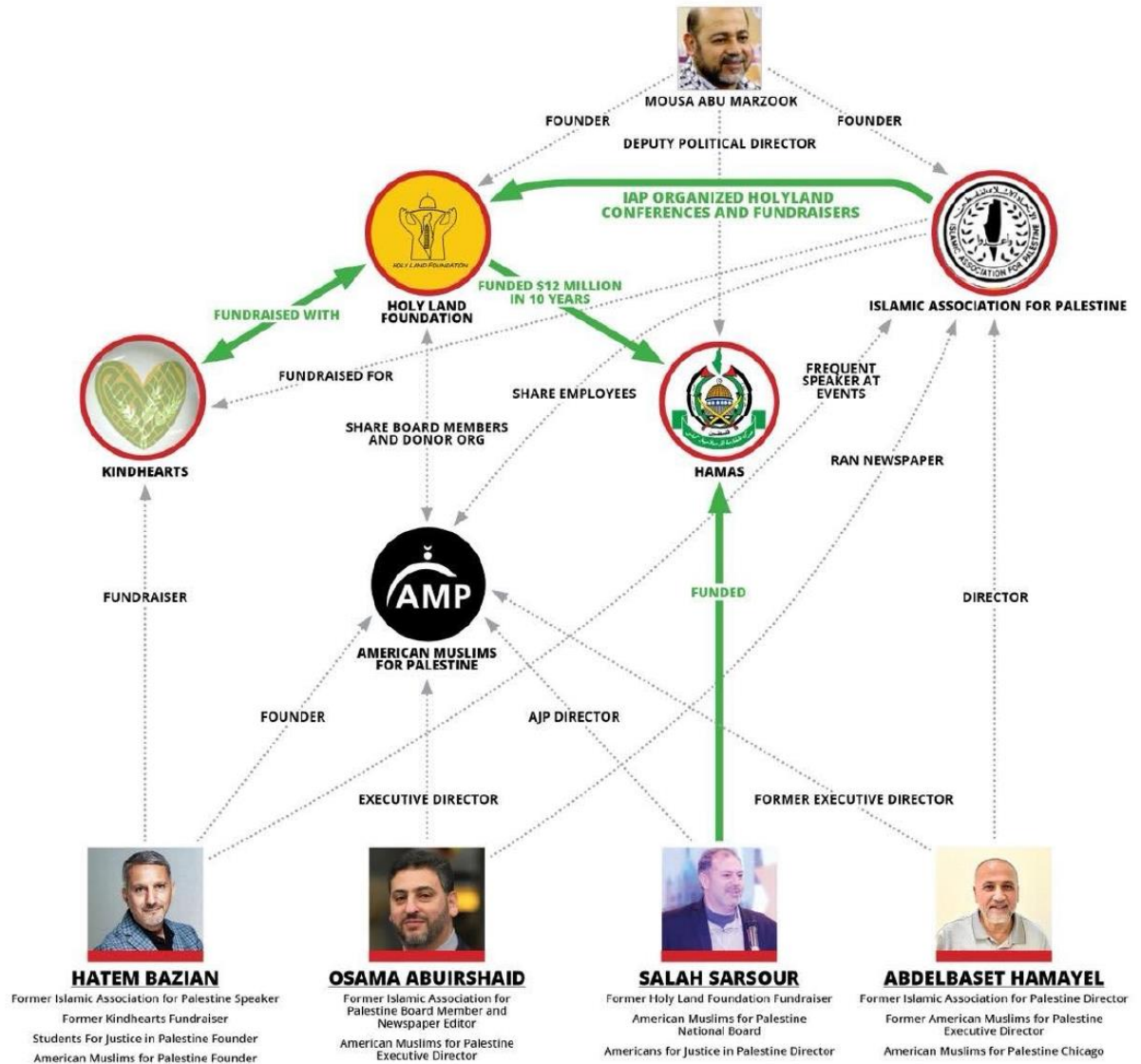
⁴¹ *CAT Program*, PALESTINE CONVENTION, <https://www.palestineconvention.org/catprogram/> (last visited June 24, 2024).

those terrorism financiers who had been convicted in the HLF trial. IAP had served as one of HLF's primary fundraisers.

50. Thus, what is occurring on college campuses is not an organic phenomenon of student activism but an orchestrated campaign by career supporters of terrorism who have dedicated their lives to fomenting hate and division and to planting the seeds of support for Hamas and other terror organizations across the United States. The below diagram captures the evolution of the terror-supporting enterprise.⁴²

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⁴² Diagram may be found in Schanzer 2023 Congressional Testimony, *supra* note 19, at 10.



iii. AJP: AMP’s “Fiscal Sponsor”

51. Though AMP ostensibly operates as its own organization, it relies on the corporate status of its fiscal sponsor, AJP Educational Foundation, Inc. (“AJP”).⁴³ AMP founded AJP in 2008. AMP and AJP have identical leadership structures and share the same principal place of

⁴³ In addition to obtaining revenue from AJP, AMP also received Paycheck Protection Plan loans from the United States government. *See* AMERICAN MUSLIMS FOR PALESTINE, 2020 ANNUAL REPORT, at 18, <https://www.ampalstine.org/educate/publications/2020-annual-report>.

business in Falls Church, Virginia. AMP’s website advertises that it is funded exclusively by domestic donations, but, upon information and belief, AMP can do so only because funds first pass through AJP, a U.S.-based non-profit.

52. Indeed, AMP is now regarded as a “doing business as” name for AJP by the Commonwealth of Virginia which, in October 2023, began to investigate “AJP Education Foundation, Inc., also known as American Muslims for Palestine” for “potential violations of Virginia’s charitable solicitation laws,” including “*benefitting or providing support to terrorist organizations*” (emphasis added).⁴⁴

iv. WESPAC: The “Fiscal Sponsor” of NSJP

53. As the NY-based fiscal sponsor of NSJP, WESPAC receives and administers donations on behalf of NSJP. WESPAC then keeps a percentage of the donations and remits the rest to the groups that it fiscally sponsors. This arrangement enables NSJP to collect and distribute funds without transparency. The financial interactions between WESPAC and its anti-Israel and pro-Hamas clientele is intentionally opaque to largely shield from public view the flow of funds between and among them.

54. For instance, WESPAC reported \$2.4 million in revenue in 2022 but spent nearly \$1.5 million solely on “office expenses,” a category that, according to the IRS, should include only

⁴⁴ See News Release, Jason Miyares, Attorney General of Virginia, Attorney General’s Office Opens Investigation Into American Muslims for Palestine Nonprofit (Oct. 31, 2023) [henceforth, “**VA Investigation**”], <https://www.oag.state.va.us/media-center/news-releases/2630-october-31-2023-attorney-generals-office-opens-investigation-into-american-muslims-for-palestine-nonprofit>.

basic costs to keep the physical office operational, such as computers, software, office cleaning services, and postage.⁴⁵

55. By contrast, WESPAC did not report a *single* fundraising expense in 2022, nor did it report spending a *single* dollar on travel, information technology, legal services, insurance, rent, or mortgage payments. It also did not report a *single* dollar of salary to its board members or executive leadership in 2022.

56. Instead, WESPAC reported the salary of one lone part-time employee in the entire organization—an administrative assistant and digital media coordinator who makes less than \$100,000 and receives neither health care nor retirement benefits.

57. As NSJP’s fiscal sponsor, WESPAC receives tax-exempt donations and grants on behalf of NSJP, since NSJP itself lacks tax-exempt status.

58. The IRS stipulates that fiscal sponsors must retain “control and discretion over use of the funds.”⁴⁶ Therefore, as the fiscal sponsor of NSJP, WESPAC is responsible for how NSJP utilizes the funds it receives from WESPAC—which includes ensuring that the funds are used for charitable purposes. Conduit-like arrangements are prohibited.

59. The clumsiness of WESPAC’s financial reporting is not the function of being a novice. Indeed, WESPAC has served as NSJP’s fiscal sponsor since at least 2016, if not earlier.⁴⁷ Rather, it obfuscates the true nature of its finances and where they ultimately go.

⁴⁵ Joseph Simonson, *Is This Suburban New York Charity a Terrorist Front Group?*, WASH. FREE BEACON (May 20, 2024), <https://freebeacon.com/national-security/is-this-suburban-new-york-charity-a-terrorist-front-group/>.

⁴⁶ *National Foundation v. United States*, 13 Cl.Ct. 486, 87-2 USTC para. 9602 (1987); *see also* Rev. Rul. 68-489, 1968-2 C.B. 210.

⁴⁷ Ira Stoll, ‘Mysterious’ Westchester Foundation Collecting the Cash for This Weekend’s National Campus BDS Convention, ALGEMEINER (Nov. 3, 2016), <https://www.algemeiner.com/2016/11/03/mysterious-westchester-foundation-collects-cash-for-this-weekends-national-campus-bds-convention/>.

v. *NSJP: Controlling Campus Advocacy*

60. In 2010, AMP sponsored the first SJP National Convention to unite the various SJP chapters. At the convention, AMP announced the creation of NSJP—AMP’s new on-campus sub-brand—designed to control the management, financing, and messaging of SJP chapters across the country.⁴⁸ Though some SJP chapters chose to remain unaffiliated on paper, they receive aid and materials from NSJP, particularly as it relates to campus messaging.

61. NSJP has no formal corporate structure of its own but operates as AMP’s college campus brand, while WESPAC funds the operation. AMP maintains organizational management and control of NSJP. To that end, in 2023, NSJP established a centralized structure to exert more control over individual SJP chapters.⁴⁹

62. NSJP, through its leadership and recruited grassroots supporters, has regularly (1) identified itself as a supporter of, and sometimes even part of, Hamas and its affiliates’ movement; (2) disseminated instructions from Hamas and other FTOs; (3) hosted speakers that are Specially Designated Global Terrorists or affiliated with them; and (4) provided direct aid to the same.

63. AMP’s message to college campuses through NSJP is unambiguous: violent attacks are a justified response to Zionism as an idea, to Israel as an entity, and to Jews as a people.⁵⁰ The purpose of this messaging is to normalize Hamas’s terrorism within Western academia and society at large, recruit college students to join and support Hamas’s terrorist aims, and to establish an

⁴⁸ Charles Asher Small et al., *Antisemitism Violent Extremism and the Threat to North American Universities: The Contextualization of the National Students for Justice in Palestine*, INSTITUTE FOR THE STUDY OF GLOBAL ANTISEMITISM AND POLICY, at 12 (Oct. 2019) [henceforth, “**ISGAP 2019**”], <https://isgap.org/wp-content/uploads/2019/10/NSJP-2019-ISGAP-Report-Long-Version.pdf>.

⁴⁹ *You Cannot Profit Off Our People’s Blood and Think Students Will Not Come For Your Money*, HAMMER & HOPE (Spring 2024), <https://hammerandhope.org/article/palestine-college-students>.

⁵⁰ See, e.g., ISGAP 2019, *supra* note 49, at 11.

environment on American college campuses where Jews are *persona non grata* and violence against them and anyone who respects Israel's right to exist is accepted, justified, and even lionized.

vi. *Defendants Provides Systematic and Ongoing Material Support to Hamas*

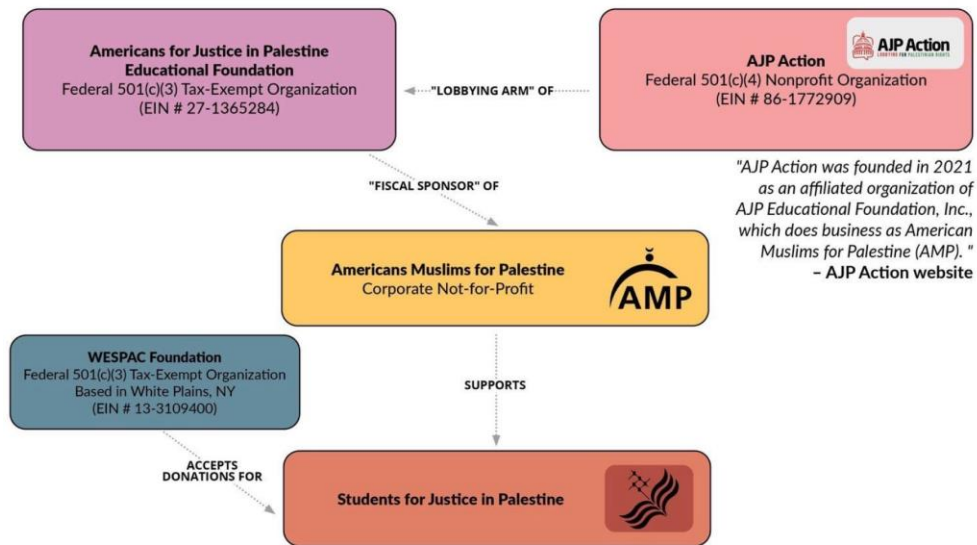
64. Defendants provide ongoing, continuous, systematic, and material support for Hamas and its affiliates in precisely the same way that HLF and IAP used to: by operating and managing Hamas's mouthpiece for North America, dedicated to white-washing Hamas's atrocities, justifying its terrorism, and recruiting new adherents all in furtherance of Hamas's terrorist agenda.

65. WESPAC knowingly collects donations for the operation, while AMP and NSJP carry out the execution of it.

66. There is no indication that AMP, NSJP, or the individuals affiliated with them (including Bazian and Abuirshaid) ever ceased providing material support to Hamas and its affiliates—even in the transition period between IAP and AMP. Now, they are merely aided in their efforts by WESPAC's fiscal sponsorship. It is within this complex framework of shell institutions that Defendants provide the necessary substantial and systematic assistance to Hamas's ongoing terrorist activity.⁵¹

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⁵¹ Diagram may be found in Schanzer 2023 Congressional Testimony, *supra* note 19, at 3.



D. HAMAS’S TERRORIST ATTACK

67. On October 7, 2023, Hamas, in coordination with the IRGC, led a terrorist attack in southern Israel in which 1,200 Israelis, Americans, and others from many countries were killed, and over 200 more were taken as hostages into Gaza.⁵² Hamas was joined in its barbarity by several other FTOs, including the Popular Front for the Liberation of Palestine (“PFLP”). Hamas and its affiliates tortured, butchered, raped, and murdered innocent men, women, and children—including dozens of U.S. citizens—at a music festival, as well as in their homes. The attack included a barrage of over 2,200 missiles shot from Gaza into Israel.⁵³ Over 6,900 people were injured in the attacks.⁵⁴

⁵² Aaron Boxman, *Israel-Hamas War Israel Lowers Oct. 7 Death Toll Estimate to 1,200*, N.Y. TIMES (updated Nov. 30, 2023), <https://www.nytimes.com/live/2023/11/10/world/israel-hamas-war-gaza-news>.

⁵³ Bill Hutchinson, *Israel-Hamas War: Timeline and key developments*, ABC NEWS (Nov. 22, 2023), <https://abcnews.go.com/International/timeline-surprise-rocket-attack-hamas-israel/story?id=103816006>.

⁵⁴ *Id.*

68. Hamas's attack did not end on October 7. Not only has Hamas continued to hold civilians hostage—including Plaintiffs' friends and family members—but it also continues to launch rockets at civilian targets, forcing many—including Plaintiffs—to fear for their lives, evacuate their homes, and seek the safety of bomb shelters.

69. October 7 marked the deadliest single day for the Jewish people since the Holocaust. Plaintiffs were among the many victims that suffered, and continue to suffer, at Hamas's hand:

- a. Mr. Gess and Ms. Almog lived in Kibbutz Holit. Mr. Gess and Ms. Almog witnessed the murders of their friends and community members and were forced to evacuate their homes. They cannot return to their homes. They lost their homes, belongings, community, and way of life.
- b. Mr. Ein-Gal and his friends was ambushed by Hamas on a beach and fled under heavy Hamas fire.
- c. Mr. Newman lost his brother David when Hamas terrorists breached the Nova Festival and savagely slaughtered him.
- d. Ms. Parizer and Ms. Sanandaji attended Nova Festival, which they miraculously survived. On October 7, they witnessed the massacre of hundreds of attendees and fled by car and on foot under Hamas gunfire.
- e. Mr. Diller and Mr. Bar Or also attended the Nova Festival and managed to survive by hiding for several hours. Both witnessed the slaughter of fellow festival goers on October 7, and many of their friends were murdered.
- f. Mr. Bromberg attended the Nova Festival and, like Mr. Diller and Mr. Bar Or, witnessed the slaughter of hundreds and lost many friends on October 7. One of his friends is still being held hostage by Hamas.

70. Plaintiffs' lives have been completely upended by Hamas's continuous terrorist activities.

71. Hamas's ongoing wave of terror has a familiar purpose consistent with Hamas's modus operandi: derailing Israel's prospects for peace with its Arab neighbors. Hamas and its puppet master, the IRGC, are threatened by the success of the Abraham Accords—a landmark

peace deal that facilitated normalization between Israel and several Arab states—and saw that Israel intended to broker peace with a major Arab power and enemy of the IRGC: Saudi Arabia. Hamas admits it is motivated by a desire to prevent normalization, explaining that its attack “landed a blow to the normalization [of relations between Israel and its Arab neighbors]. What happened before will not be the same after this operation. This was one of the operation’s goals.”⁵⁵

E. *HAMAS TERROR-BY-PROPAGANDA STRATEGY*

72. Hamas’s strategy vis-à-vis Israel and the United States relies on propaganda and lies to influence public opinion and justify its horrendous actions. Article 29 of Hamas’s Charter makes this strategy explicit, calling on its supporters to provide Hamas:

with strategic depth in all human material and informative spheres, in time and in place. This should be done through the convening of solidarity conferences, the issuing of explanatory bulletins, favourable articles and booklets, enlightening the masses regarding the Palestinian issue, clarifying what confronts it and the conspiracies woven around it. They should mobilize the Islamic nations, ideologically, educationally and culturally, so that these peoples would be equipped to perform their role in the decisive battle of liberation, just as they did when they vanquished the Crusaders and the Tatars and saved human civilization.⁵⁶

Hamas has issued express guidelines detailing how its propagandists should “play their part in strengthening the home front and in properly conveying information worldwide.”⁵⁷

73. Hamas’s strategy is to commit a terrorist attack against civilians and then use Israel’s retaliatory or defensive response as a springboard to, through Defendants and others, launch objectively false propaganda and terrorize institutions to sway global public opinion against Israel and toward Hamas. Hamas’s propaganda campaigns regularly include—among a laundry

⁵⁵ Velina Tchakarova (@vtchakarova), X (formerly Twitter) (Oct. 21, 2023, 7:36 AM), <https://x.com/vtchakarova/status/1715693654197579867>.

⁵⁶ HAMAS, THE COVENANT OF THE ISLAMIC RESISTANCE MOVEMENT (Aug. 18, 1988), https://avalon.law.yale.edu/20th_century/hamas.asp.

⁵⁷ IDF Editorial Team, *Hamas Social Media Rules: Describe Terrorists as Innocent Civilians*, ISRAEL DEFENSE FORCES (July 21, 2014), <https://www.idf.il/en/mini-sites/the-hamas-terrorist-organization/hamas-social-media-rules-describe-terrorists-as-innocent-civilians/>.

list of other common lies—misrepresentative death tolls (often conflating combatant and civilian death tolls) and objectively false accusations that Israel is an “apartheid state” engaged in a genocide campaign against Palestinians.⁵⁸

74. Hamas’s terror-by-propaganda strategy “transcends conventional warfare tactics, aiming to exploit the international community’s response to civilian casualties, generate global condemnation of Israel, hamstring the IDF’s operations, and protect Hamas’s military capabilities under the guise of civilian safety.”⁵⁹

75. In other words, Hamas’s strategy is mainly designed to achieve victory through propaganda and brainwashing.

[W]ithin hours of its attack on October 7th, Hamas’ Qatar-based politburo web operatives flipped the switch on a slickly produced global social media disinformation campaign calculated to trigger an outpouring of pro-Palestinian/anti-Israel sentiment across global social media platforms to amplify (and justify) Hamas’ terror.

The initial disinformation flood was in Arabic directed at Arab social media sites to create sympathy for Hamas for its “defense” of Jerusalem’s Muslim holy places and its “justified” struggle to free Palestinian prisoners jailed in Israel. But its second phase unleashed tens of thousands of fake disinfo[rmation] bots in other languages to push the Hamas anti-Israel/antisemitic narrative.⁶⁰

The disinformation bots primarily pushed the narrative that Hamas’s terrorist attack, specifically its hostage-taking, was justified. Hamas conducted the first wave of its propaganda through servers

⁵⁸ It is widely known, for example, that approximately 2 million Muslims live in Israel, and nearly all are citizens or permanent residents. *See, e.g.,* Kali Robinson, *What to Know About the Arab Citizens of Israel*, COUNCIL ON FOREIGN RELATIONS (Oct. 26, 2023), <https://www.cfr.org/backgrounder/what-know-about-arab-citizens-israel>.

⁵⁹ Joshua Klein, *Exclusive: Renown Urban Warfare Expert John Spencer Warns ‘World Playing Into Hamas’s Strategy’*, BREITBART (Apr. 1, 2024), <https://www.breitbart.com/politics/2024/04/01/exclusive-renown-urban-warfare-expert-john-spencer-warns-world-playing-hamass-strategy/>.

⁶⁰ COALITION FOR A SAFER WEB, THE HAMAS “INFLUENCER” INTIFADA (NOV. 16, 2023) [henceforth, “CSW Report”], <https://coalitionsw.org/the-hamas-influencer-intifada/>.

in Pakistan, Qatar, and Iran.⁶¹ The second wave was handled on Hamas’s behalf by Hamas’s PR foot soldiers in the West: AMP, NSJP, WESPAC, and their allies.

76. In short, Hamas relies on its propagandists around the world to do its bidding, spreading its falsehoods about Israel and the Jews far and wide, and to instigate a culture of violence and fear to sway global institutions to behave in Hamas’s favor. Global propaganda, particularly directed at the West and the United States, is not just one small part of Hamas’s broader strategy: *it is Hamas’s grand strategy*.

F. *HAMAS’S OCTOBER 7TH CALL TO ACTION*

77. Within hours of Hamas’s October 7 attack, Hamas leader Ismail Haniyeh called for Hamas’s “resistance abroad” to “join this battle any way they can.” He also stated, “Let us be *partners* in creating this great victory, *inshallah*.”⁶² Three days later, Mr. Mashal—the leader of Hamas’s diaspora office and founder of IAP—called on Hamas’s global supporters to be “part of this battle.”⁶³

G. *DEFENDANTS ANSWER THE CALL*

78. Within hours of the attack, the language of the Hamas-authored disinformation campaign appeared in NSJP propaganda across social media and on college campuses. Exactly as AMP intended, NSJP acted as Hamas’s loyal foot soldiers for Hamas’s propaganda battle on

⁶¹ CSW Report.

⁶² *Al-Jazeera Airs Hamas Leader Ismail Haniyeh’s Statement On Hamas’s Invasion Of Southern Israel: I Call On Palestinians In The West Bank, Israeli Arabs, And The Entire Nation Abroad To Join The Battle; To The Enemy I Say: Get Out Of Our Land!*, MEMRI TV (Oct. 7, 2023), <https://www.memri.org/tv/hamas-leader-ismail-haniyeh-statement-jazeera-operation-aqsa-deluge-palestinians-west-bank-israel-abroad-join-battle>.

⁶³ *Former Hamas Leader Khaled Mashal Calls For ‘Friday Of The Al-Aqsa Flood’: Muslims Should Take To The Streets Worldwide, Join The Battle; The West, America, Zionists Will See Convoys Of Mujahideen On Their Way To Palestine*, MEMRI TV (Oct. 10, 2023), <https://www.memri.org/tv/fmr-hamas-leader-calls-muslims-world-join-battle-palestine>.

university campuses across the United States. *The next day*, NSJP released its Day of Resistance Toolkit (“**NSJP Toolkit**”) across more than 300 American college campuses and on the internet.⁶⁴

79. The NSJP Toolkit uses the euphemism “the resistance” and similar phrases to refer to Hamas and the other terror organizations working under its command:

Referred to as Operation *Towfan Al-Aqsa* (Al-Aqsa Flood), the resistance has taken occupation soldiers hostage, fired thousands of rockets, taken over Israeli military vehicles, and gained control over illegal Israeli settlements. In the West Bank, the Palestinian resistance has called for collective action by the Palestinian masses amidst attempts by the Zionist entity to lock-up the West Bank.

...

Today, we witness a historic win for the Palestinian resistance: across land, air, and sea, our people have broken down the artificial barriers of the Zionist entity . . . As the Palestinian student movement, we have an unshakable responsibility to join the call for mass mobilization.⁶⁵

80. The NSJP Toolkit’s references to “the resistance” unambiguously refer to Hamas and the other FTO’s working under its command.

81. The NSJP Toolkit is a direct response to Hamas’s “call for mass mobilization” issued the day prior. In it, NSJP demands its members and allies “not only support, but *struggle alongside our people back home ... and above all normalize and support our fearless resistance.*”⁶⁶ To do so, the NSJP Toolkit puts forth a strategy to “normalize the resistance,” Hamas, by arguing that

*Liberation is not an abstract concept. . . . [L]iberating colonized land is a real process that requires confrontation by **any means necessary**. In essence, decolonization is a **call to action** . . . It calls upon **us** to engage in meaningful actions that go beyond symbolism and rhetoric. Resistance comes in all forms—**armed***

⁶⁴ The NSJP Toolkit is attached as **Exhibit A**. We also note that, just weeks (or possibly days) before the October 7 terror attacks, NSJP curiously decided to launch its own publication to spread its pro-Hamas messaging. In other words, the infrastructure of dissemination was assembled on or around October 7.

⁶⁵ *Id.* at 1.

⁶⁶ *Id.*

struggle, general strikes, and popular demonstrations. *All of it is legitimate, and all of it is necessary.* (emphases added)⁶⁷

82. The NSJP Toolkit thus urges AMP, NSJP, their members, and their allies to provide “real” support to Hamas not only through their arguments and rhetoric, but also through “confrontation” that includes, among other things, “armed struggle” and violence.

83. In a section titled “Unity Intifada”, the NSJP Toolkit explains that:

the resistance fighters are still launching new attacks into 48⁶⁸ ... The revolution is being waged across historic Palestine—not just cross-factional, but unifying our people in the name of resistance. All Palestinian factions in Gaza appear to be participating under unified command. *This is the first time since 1949 that a large-scale battle has been fought within ‘48 Palestine.*⁶⁹

84. Immediately after describing the Unity Intifada, NSJP confirmed it was “PART of this movement, not in solidarity with this movement.”⁷⁰ Again, only Hamas operates a “unified command” in Gaza. There is no ambiguity: Defendants identify themselves as not just aligned with Hamas’s terrorist activities, but “*PART of*” them.

85. The NSJP Toolkit was distributed to prepare and organize a “Day of Resistance” to support Hamas’s terrorist activities. NSJP intentionally avoids acknowledging Hamas’s most despicable crimes—the rape, kidnap, and the slaughter of innocent civilians—and simply declares that “[s]ettlers are not ‘civilians’” and therefore can be murdered in cold blood.⁷¹

86. The NSJP Toolkit further provides graphics and advertisements for SJP Chapters and allies to use that includes images of paragliders, which references how Hamas infiltrated the

⁶⁷ *Id.* at 4; see also Sheera Frenkel and Steven Lee Myers, *Antisemitic and Anti-Muslim Hate Surges Across the Internet*, N.Y. TIMES (Nov. 15, 2023), <https://www.nytimes.com/2023/11/15/technology/hate-speech-israel-gaza-internet.html>.

⁶⁸ “48” is a euphemism for Israel, referring to the year of the state’s establishment.

⁶⁹ Exhibit A at 4.

⁷⁰ *Id.*

⁷¹ *Id.* at 3.

Nova Festival.⁷² Neither Hamas, nor any other terrorist organization, had ever used paragliders to commit a terrorist attack until October 7—just one day before NSJP provided the graphics.

87. The NSJP Toolkit further requests member organizations endorse the “Towfan Al-Aqsa Statement”⁷³ from “Bears for Palestine”—NSJP’s University of California at Berkeley chapter. The statement, analogous to the NSJP Toolkit, declares its “unwavering support of the resistance in Gaza and the broader occupied Palestinian lands” and encourages Hamas and its affiliates to continue killing and taking hostages.⁷⁴ Many of Defendants’ affiliates signed the Towfan Al-Aqsa Statement, which declares “[w]e honor Palestinians who are working on the ground on several axes of the so-called ‘Gaza envelope’ alongside our *comrades in blood and arms*, and what is coming is greater. Victory or martyrdom.”

88. These “comrades in blood and arms” are FTOs operating as part of the “Unity Intifada” under Hamas’s “united command.” In fact, the “comrades in blood in arms” language is lifted directly from an FTO-affiliated Telegram chat called Resistance News Network.⁷⁵ As illustrated in the Telegram chat, that phrase was first used by the Martyr Abu Ali Mustafa Brigade of the PFLP on October 7, 2023, to refer to Hamas terrorists. The next line declares, “We stand with our brothers in the Al-Qassam Brigades⁷⁶ and with all the resistance forces, and we merge with them in this battle that will be recorded in history.”

⁷² *Id.* at 5.

⁷³ The Bears for Palestine statement shares its name with Hamas’s name for its terrorist attack: Towfan Al-Aqsa, which means “Al-Aqsa Flood.”

⁷⁴ The “Towfan Al-Aqsa Statement” is attached as **Exhibit B**.

⁷⁵ The Resistance News Network Telegram Chat is attached as **Exhibit C**.

⁷⁶ The Al-Qassam Brigades are Hamas’s military wing.

i. *Defendants' Violence and Terror on American College Campuses*

89. The NSJP Toolkit is not a mere rhetorical tool. It is an action-oriented instruction manual created by NSJP, with Hamas's instructions and mission, AMP's control and assistance, and WESPAC's funding.

90. The NSJP Toolkit directed Defendants' members and allies "to engage in meaningful actions that go beyond symbolism and rhetoric" to include all potential forms of resistance, including "armed struggle" and violence.

91. Hamas itself echoed those same calls. For example, on December 5, 2023, in an interview on Al-Aqsa TV (Hamas-Gaza), a senior Hamas official, Sami Abu Zahri, called on Hamas's allies in the United States to engage in domestic terrorism to support Hamas's terrorist activities.⁷⁷

92. Defendants' encouragement of its members, affiliates, and allies to join the "resistance"—again, a euphemism for Hamas itself—is not mere speech or advocacy. Rather, Defendants encouraged their members to exert political pressure on American institutions and politicians, in service of Hamas's goals. The chaotic images emerging from American campuses are the intended result of Defendants' endeavors.

93. ***In short, Defendants fund and act as Hamas's public relations division, recruiting domestic foot soldiers to disseminate Hamas's propaganda and to incite and engage in violence directed at creating chaos and fear across the United States, intimidating American citizens and policymakers, and forcing American policy to shift in Hamas's favor. These***

⁷⁷ *Hamas Senior Official Sami Abu Zuhri Calls For Violence Against American And British Interests Worldwide; Adds: Blinken Is An Enemy, Just Like Netanyahu; Both Will Pay The Price*, MEMRI TV (Dec. 13, 2023), <https://www.memri.org/reports/hamas-senior-official-sami-abu-zuhri-calls-violence-against-american-and-british-interests>.

*activities are instrumental to Hamas’s short and long-term goals and help Hamas continue its ongoing international terrorist activities with less resistance.*⁷⁸

94. Just as the NSJP Toolkit instructs, Defendants “normalize[d]” Hamas by sanitizing its actions and spreading falsehoods about Israel. For example, Defendants and their members tore down posters identifying hostages, claimed verifiable allegations of rampant sexual assault and sadistic murder were Zionist conspiracy theories, and falsely accused Israel of genocide.

95. Defendants upheld their commitment in the NSJP Toolkit to treat “liberation” as something “beyond symbolism and rhetoric” that is secured through “confrontation *by any means necessary*.”⁷⁹ Defendants’ members and allies responded to this command by engaging in illegal acts of domestic terrorism—including trespass, assault, vandalism, robbery, destruction of property, harassment, and intimidation—to further the “resistance” efforts.

96. Defendants organized “Day of Resistance” riots and protests for many SJP chapters,⁸⁰ including chapters at Columbia University, Arizona State University, University of North Carolina, George Mason University, University of California-San Diego, and elsewhere on October 12, 2023, to coincide with Hamas’s proclaimed “Day of Rage” for its supporters in Gaza and the West Bank on October 13, 2023 (which would be late in the evening on October 12, 2023, in many parts of the United States).⁸¹

⁷⁸ FEDERAL BUREAU OF INVESTIGATION, TERRORISM, <https://www.fbi.gov/investigate/terrorism> (last visited Apr. 29, 2024).

⁷⁹ NSJP Toolkit, *supra* note 65, at 4 (emphasis added).

⁸⁰ The “Day of Resistance” events were ultimately pro-Hamas festivals. For instance, at Columbia University, SJP members chanted such phrases as “Jews will not defeat us,” “resistance is justified,” and “from the River to the Sea.” Members also held up “glory to the martyrs” signs lauding Hamas and the October 7 terror attacks.

⁸¹ David Swindle, *Students for Justice in Palestine chapters launch pro-terror rallies across US*, JEWISH NEWS SYNDICATE (Oct. 13, 2023), <https://www.jns.org/students-for-justice-in-palestine-chapters-launch-pro-terror-rallies-across-america/>; Aaron Bandler, *Roundup of SJP Chapters’*

97. In the days, weeks, and months following October 7, many SJP events were violent affairs aimed at normalizing Hamas’s rhetoric, terrorizing students, and forwarding the “resistance.” For example:

- a. **University of North Carolina:** The UNC SJP rally on October 12, 2023, was advertised using materials taken directly from the NSJP Toolkit, including flyers showing images of paragliders. SJP members threateningly brandished knives at Jewish students and instructed their members to wear masks in violation of the North Carolina anti-mask law.⁸² The coordinators, just as the NSJP Toolkit instructs, sought to normalize Hamas’s terrorist activities and instigated violence against, among others, a Jewish professor.⁸³ UNC SJP did exactly what the NSJP Toolkit asked it to do: it committed unlawful violent acts to assist Hamas’s goals—which include terrorizing Jews and normalizing Hamas’s atrocities. And its followers did so while yelling, “*We are Hamas.*”⁸⁴
- b. **Harvard University:** On October 18, 2023, members of the Harvard College Palestine Solidarity Committee (PSC), a recognized NSJP affiliate, hosted an event at which they physically assaulted and harassed a Jewish student on campus.⁸⁵

“*Day of Resistance*” Protests, JEWISH J. (Oct. 18, 2023), <https://jewishjournal.com/uncategorized/364002/roundup-of-sjp-chapters-day-of-resistance-protests/>.

⁸² See Peter Reitzes, *UNC Student Group and Professor Celebrate Hamas Murder of Israelis; Where Is the Outrage?*, THE ALGEMEINER (Oct. 16, 2023), <https://www.algemeiner.com/2023/10/16/unc-student-group-and-professor-celebrate-amas-murder-of-israelis-where-is-the-outrage/>. See also N.C. Stat. § 14-12.8. North Carolina’s anti-mask law was directed at preventing the Ku Klux Klan from operating and engaging in terrorist activity with anonymity. Sierra Pfeifer, *UNC Asks Pro-Palestine Protesters To Stop Wearing Masks, Citing 1953 Anti-KKK Law*, CHAPELBORO (Apr. 19, 2024), <https://chapelboro.com/news/unc/unc-asks-pro-palestine-protesters-to-stop-wearing-masks-citing-1953-anti-kkk-law>.

⁸³ Chelsea Donovan, *Sides Clash as UNC-Chapel Hill Protest Between Pro-Palestine and Pro-Israel Groups Turns Heated*; WRAL News (Oct. 12, 2023), <https://www.wral.com/story/sides-clash-as-unc-chapel-hill-protest-between-pro-palestine-pro-israel-groups-turns-heated/21093642/>; Reitzes, *supra* note 58. See also Exhibit A at 5.

⁸⁴ StopAntisemitism (@StopAntisemites), X (formerly Twitter) (Oct. 14, 2023), <https://x.com/StopAntisemites/status/1713188995771834672>.

⁸⁵ Washington Free Beacon Staff, *Israeli Harvard Business School Student Accosted and Harassed Amid Gaza ‘Die-In’ on Campus*, WASH. FREE BEACON (Oct. 21, 2023), <https://freebeacon.com/campus/israeli-harvard-business-school-student-accosted-and-harassed-amid-gaza-die-in-on-campus/>.



A Jewish student at Harvard Business School surrounded and assaulted by Harvard PSC members while walking to class.⁸⁶

- c. **The Cooper Union for the Advancement of Science and Art (“Cooper Union”)**: On October 25, 2023, the Cooper Union SJP chapter hosted an event which included an angry mob that held innocent Jewish students hostage in the library⁸⁷ in violation of N.Y. Penal Law § 135.10 (unlawful imprisonment in the first degree). While Cooper Union chose not to press charges, the SJP affiliate did exactly what the NSJP Toolkit asked it to do: the chapter arranged a public event and committed unlawful acts to “Globalize the Intifada.”⁸⁸

⁸⁶ *Id.*

⁸⁷ Louis Keene, *Jewish students at Cooper Union told to hide as pro-Palestinian protesters banged on doors of locked library*, THE FORWARD (Oct. 25, 2023), <https://forward.com/fast-forward/566967/cooper-union-library-jewish-students-hide-protest/>.

⁸⁸ The First and Second Intifadas were tragic periods in Israeli history in which Palestinian terrorists crossed into Israel to commit terror attacks against Israeli civilians at bus stops, hotels, restaurants, and other civilian centers. Thousands of Israelis died or were injured. *See* AJC, *WHAT DOES “GLOBALIZE THE INTIFADA” MEAN AND HOW CAN IT LEAD TO TARGETING JEWS WITH VIOLENCE?* (Dec. 4, 2023), <https://www.ajc.org/news/what-does-globalize-the-intifada-mean-and-how-can-it-lead-to-targeting-jews-with-violence>.



Jewish students barricaded inside the library of Cooper Union due to SJP riots outside.⁸⁹

- d. **Brandeis University:** On November 6, 2023, Brandeis University withdrew its recognition of its SJP chapter after, among other things, its members made explicit threats against the Hillel Rabbi for opposing the group’s open support for Hamas in an email he sent to the Brandeis Jewish community. Law enforcement was so concerned that the Hillel Rabbi was assigned personal security the day SJP scheduled a vigil for the “martyrs of Gaza.”⁹⁰ In banning Brandeis SJP, Brandeis University President Ron Liebowitz stated that his “decision was made because SJP openly supports Hamas, which the United States has designated as a Foreign Terrorist Organization,” and because it “call[s] for the violent elimination of Israel and the Jewish people.”⁹¹
- e. **University of Chicago:** On November 9, 2023, members of the University of Chicago United for Palestine chapter unlawfully took over a building and were arrested and charged with “criminal trespass to real property,” typically a Class B misdemeanor under Illinois law. The charges were eventually dropped, and the judge released them with a warning, explaining that they were allowed to have only peaceful, lawful protests. In response,

⁸⁹ Katherine Donlevy & Steven Vago, *Cooper Union barricades Jewish students inside library as pro-Palestinian protesters bang on doors*, N.Y. POST (Oct. 25, 2023), <https://nypost.com/2023/10/25/news/cooper-union-barricades-jewish-students-inside-library/>.

⁹⁰ See Rabbi Seth Winberg, *I’m a rabbi at Brandeis. Its decision voiding recognition for its Students for Justice in Palestine chapter was the right move*, THE FORWARD (Nov. 4, 2023), <https://forward.com/opinion/569676/brandeis-hillel-students-for-justice-palestine/>.

⁹¹ Letter from Ron Liebowitz, President of Brandeis University, to the Brandeis University Community (Nov. 8, 2023), <https://www.brandeis.edu/president/letters/2023-11-08-free-speech-not-hate-speech.html>.

the group, along with Defendant NSJP, posted the judge’s statement on their respective Instagram accounts, announcing, “WE REJECT THIS.”⁹²

- f. **Columbia University:** On November 10, 2023, Columbia University suspended its chapter of SJP for, among other things, “threatening rhetoric and intimidation.”⁹³ The day prior, Columbia SJP had held a “Shut it Down” rally where one speaker yelled “fuck the Jews,” “death to Jews,” and “fuck Israel,” while encouraging SJP members to assault the pro-Israel students present.⁹⁴ As of the filing of this complaint, the chapter remains suspended, as it refuses to agree to follow University policies in exchange for reinstatement. It has, however, continued to hold unsanctioned events, including co-hosting a panel with actual terrorists and a member of the NSJP Steering committee that explicitly asked students to support Hamas. In late April 2024, Columbia SJP members set up an illegal encampment on campus and vandalized and forcefully stormed Hamilton Hall.



*Columbia SJP rioters breaking into Hamilton Hall.*⁹⁵

⁹² UChicago United for Palestine (@uchicagounited) & National SJP (@nationalsjp), INSTAGRAM, https://www.instagram.com/p/C1F6uo7LAYA/?utm_source=ig_embed&ig_rid=5869493b-54eb-4205-9646-eb126c132180&img_index=1 (last visited Apr. 29, 2024).

⁹³ Statement from Gerald Rosberg, Chair of the Special Committee on Campus Safety, COLUMBIA NEWS (Nov. 20, 2023), <https://news.columbia.edu/news/statement-gerald-rosberg-chair-special-committee-campus-safety>.

⁹⁴ None of this support for terrorism and terrorizing of Jewish students is new for Columbia’s SJP chapter. In the past, the group has framed the several Intifadas against Israeli civilians as “legitimate acts of resistance”; held a “Gaza Solidarity Rally” next to another student group’s Holocaust commemoration booth; and promoted caricatures of Israeli soldiers as having horns and large noses, among many other acts.

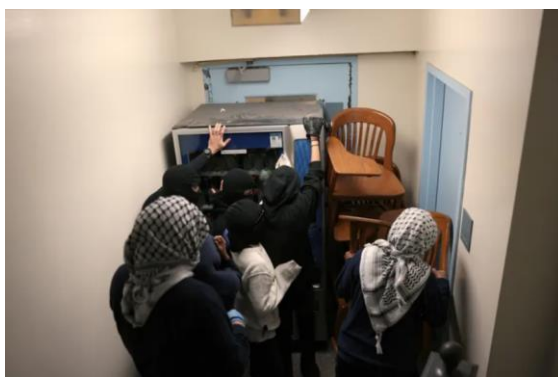
⁹⁵ Alex Kent & Matt Stieb, *Behind the Barricades at Columbia’s Hamilton Hall Takeover*, N.Y. MAGAZINE (updated May 1, 2024), <https://nymag.com/intelligencer/article/columbias-hamilton-hall-takeover-photos-from-inside.html>.



Columbia SJP rioter smashing a door at Hamilton Hall.⁹⁶



Columbia SJP rioters barricading a door at Hamilton Hall.⁹⁷



Columbia SJP rioters barricading another door at Hamilton Hall.⁹⁸

- g. **Arizona State University:** On November 14, 2023, police were called when Arizona State University SJP members threw rocks at the windows of an ongoing student government meeting at which Jewish students were

⁹⁶ *Id.*

⁹⁷ *Id.*

⁹⁸ *Id.*

speaking, while chanting “Intifada, Intifada.”⁹⁹ Police had to escort the Jewish students to safety.¹⁰⁰

- h. **University of Michigan:** On November 17, 2023, SJP members at the University of Michigan broke into an administrative building and injured two police officers. Forty people were arrested.¹⁰¹



University of Michigan SJP members storm an administrative building, chanting, “move cop, get out the way, we know you’re Israeli-trained.”¹⁰²

- i. **Temple University:** On December 3, 2023, Temple University’s SJP chapter, in a mob-like fashion, descended upon Goldie’s, a falafel restaurant owned by an Israeli Jew, screaming, “Goldie, Goldie, you can’t hide, we charge you with genocide.”¹⁰³ The mob then vandalized the windows of the restaurant.¹⁰⁴ The U.S. Department of Education has since opened an investigation into Temple University based on allegations of antisemitism,

⁹⁹ KTAR.com Staff, *ASU police investigates disruption at student government meeting after rocks thrown*, KTAR NEWS (Nov. 16, 2023), <https://ktar.com/story/5549125/asu-police-investigates-disruption-at-student-government-meeting-after-rocks-thrown/>.

¹⁰⁰ Maggie Kelly, *Police escort Jewish students from ASU meeting after rocks thrown*, COLLEGE FIX (Nov. 15, 2023), <https://www.thecollegefix.com/police-escort-jewish-students-from-asu-meeting-after-rocks-thrown/>.

¹⁰¹ Rose White, *40 pro-Palestinian protesters arrested at University of Michigan*, MLIVE (Nov. 18, 2023), <https://www.mlive.com/news/ann-arbor/2023/11/40-pro-palestinian-protesters-arrested-at-university-of-michigan.html>.

¹⁰² Aleks Phillips, *Videos Show Pro-Palestinian Protesters Storm Michigan University Building*, NEWSWEEK (Nov. 18, 2023), <https://www.newsweek.com/video-pro-palestinian-protesters-storm-michigan-university-building-police-1844961>.

¹⁰³ Emily Scolnick, *Pro-Palestinian supporters rally against war in Gaza as Penn investigates graffiti along march route*, THE DAILY PENNSYLVANIAN (Dec. 4, 2023), <https://www.thedp.com/article/2023/12/penn-protest-rally-palestine-gaza-uc-townhomes>.

¹⁰⁴ Ben Clerkin, *Antisemitic mob targets Jewish falafel restaurant in Philadelphia*, JEWISH CHRONICLE (Dec. 4, 2023), <https://www.thejc.com/news/usa/antisemitic-mob-targets-jewish-falafel-restaurant-in-philadelphia-g3xe630y>.

in part stemming from SJP's behavior outside of Goldie's, as well as the group's repeated chants for "intifada" and "from the river to the sea."¹⁰⁵

- j. **Rutgers University:** On December 12, 2023, Rutgers University suspended its SJP chapter for unlawful behaviors including, among other things, vandalism, noting that the administration had "a reasonable basis to conclude that the continued activities by the student organization pose a substantial and immediate threat to the safety and well-being of others."¹⁰⁶
- k. **University of California at Berkeley:** On February 26, 2024, Bears for Palestine stormed an event where an IDF Reservist was scheduled to deliver a lecture on international law.¹⁰⁷ Prior to the event, Bears for Palestine had posted on its social media that it would "SHUT IT [the event] DOWN."¹⁰⁸ When the location was changed in response to mounting protests, Bears for Palestine blasted the location change on its social media, directing protesters to go to the new location.¹⁰⁹ The members blocked the venue, smashed the windows, and physically attacked several Jewish students in attendance.¹¹⁰ One student reported being choked by rioters.¹¹¹ Police are investigating the batteries as hate crimes.¹¹²
- l. **Emory University:** On April 2, 2024, Emory's SJP Chapter descended upon Emory's Chabad House with Palestinian flags and signs in response to Chabad hosting an IDF Reservist commander for dinner and a talk. One

¹⁰⁵ Adam Sabes, *Dept of Ed opens investigation into Temple University over anti-Semitic incidents*, CAMPUS REFORM (Jan. 16, 2024), <https://www.campusreform.org/article/exclusive-dept-of-ed-opens-investigation-into-temple-university-over-anti-semitic-incidents/24656>.

¹⁰⁶ Andrew Lapin, *Rutgers suspends Students for Justice in Palestine for violating university policies*, TIMES OF ISRAEL (Dec. 13, 2023), <https://www.timesofisrael.com/rutgers-suspends-students-for-justice-in-palestine-for-violating-university-policies/>.

¹⁰⁷ Salvador Hernandez, *Pro-Palestinian protesters shut down event organized by Pro-Israel student groups at UC Berkeley*, L.A. TIMES (Feb. 27, 2024), <https://www.latimes.com/california/story/2024-02-27/pro-palestinian-protesters-shut-down-event-organized-by-jewish-students-at-uc-berkeley>.

¹⁰⁸ Bears for Palestine (@bears for Palestine), INSTAGRAM, https://www.instagram.com/p/C3ytamHJyIg/?img_index=1 (last visited April 29, 2024).

¹⁰⁹ See Hernandez, *supra* note 108.

¹¹⁰ Aaron Bandler, *UC Berkeley Jewish Student Says She Was Choked By Pro-Palestinian Protesters Who Shut Down Israeli Lecture*, JEWISH JOURNAL (Feb. 27, 2024), <https://jewishjournal.com/news/368623/jewish-student-says-she-was-choked-at-uc-berkeley-pro-palestinian-protest/>.

¹¹¹ *Id.*

¹¹² Alex Baker, *Hate crime investigation launched in connection to protest over Israeli speaker at UC Berkeley*, KRON4 (Mar. 4, 2024), <https://www.kron4.com/news/bay-area/hate-crime-investigation-launched-in-connection-to-protest-over-israeli-speaker-at-uc-berkeley/#:~:text=The%20UC%20Berkeley%20Police%20Department,additional%20allegation%20of%20physical%20battery>.

Jewish student holding an Israeli flag was punched in the stomach and spit on by a protester, while his flag was taken from him. One of SJP's invited agitators was arrested for threatening Jewish students with a gun.¹¹³

- m. **California State Polytechnic University-Humboldt** (“**Cal Poly-Humboldt**”): In late April 2024, Cal Poly-Humboldt was forced to shutter its doors for the remainder of the semester because its campus was “occupied” by pro-Palestinian protestors.¹¹⁴ NSJP supports the student protests.¹¹⁵
- n. **Yale University**: On May 29, 2024, Yale University’s SJP Chapter, known as “Yalies4Palestine,” called for—in both Arabic and English—an “open intifada” and to “escalate disruption” on its Instagram:

Escalate disruption and confrontation across historic Palestine, from every checkpoint and street corner to the face of every settler and soldier. Escalate protests to an open intifada in every capital and city in order to deprive the world from its heavy slumber that comes at the expense of the bodies and remains of those who survive; disrupt [or "paralyze"] all facets of daily life until our people can breathe freely without the taint of the Israeli, American, and European war machine.¹¹⁶

A reply to the original post reads, “The Zionist entity is expecting us to be distracted from their atrocities this holiday weekend. DM us to find an emergency action in your area **as we answer the call for a worldwide escalation**” (emphasis added). The post has since been removed.

- o. **Baruch College**: On June 5, 2024, Baruch College’s SJP chapter, along with other pro-Hamas groups, staged a protest outside the Baruch College Hillel, allegedly in response to a recently organized Hillel trip to an Israeli army base.¹¹⁷ Hillel serves as the center of Jewish cultural and religious life

¹¹³ Jack Rutherford & Clement Lee, *Student ‘assaulted’ at protest outside Chabad*, Emory Wheel (Apr. 3, 2024), <https://emorywheel.com/student-assaulted-at-protest-outside-chabad/>.

¹¹⁴ California State Polytechnic University-Humboldt, *Emergency: Campus Access, Resources, and Support*, <https://www.humboldt.edu/emergency> (last visited April 28, 2024).

¹¹⁵ National SJP (@NationalSJP), X (formerly Twitter) (Apr. 27, 2024), <https://x.com/nationalsjp/status/1784418921585529246?s=61&t=SPDhL2DW4PEZOadUv3LplQ>.

¹¹⁶ Stephen Green, *Yale Group Welcomes You to the Global Intifada*, PJ MEDIA (May 29, 2024), <https://pjmedia.com/vodkapundit/2024/05/29/welcome-to-the-global-intifada-n4929413>.

¹¹⁷ Luke Tress, *Baruch College student groups protest Hillel, in rally decried as antisemitic*, TIMES OF ISRAEL (June 7, 2023), <https://www.timesofisrael.com/baruch-college-student-groups-protest-hillel-in-rally-decried-as-antisemitic/>.

for many American campuses. One protester carried a sign stating, “It is right to rebel, Hillel go to hell,” with an inverted red triangle on it, a symbol popularized on social media to signify support for Hamas (the terrorist group features the symbol in videos of its attacks).¹¹⁸ Protesters similarly made inverted triangles with their hands. Several protesters wore the green headband of Hamas, while one of the leaders of the protests wore a PFLP headband.

- p. **University of California-Los Angeles (“UCLA”)**: On June 10, 2024, UCLA SJP protesters assaulted and harassed Chabad Rabbi Dovid Gurevich, knocking his phone out of his hand.¹¹⁹ “Go back to Poland,” one protester said. “Where the fuck you’re really from.” Rabbi Gurevich urged the protesters to uncover their faces, to which one responded, “If I show my face, I’ll have to fucking kill you.” UCLA’s SJP chapter had advertised the protest on its Instagram as an “Honor the Martyrs” protest. “We ask you all to commemorate the lives lost, and to join us in protest of the UC’s complicity in such destruction,” the post reads. “We will not rest until we recognize every martyr: from those that were only a few months old, to those that were older than the occupation itself.”
- q. **Columbia University, Brooklyn College & City University-New York**: A host of New York-based chapters of SJP advertised and took part in Within Our Lifetime’s “Day of Rage” on June 10, 2024,¹²⁰ which included converging at Union Square, harassing subway goers who might be possible Zionists, and rioting outside the Nova Music Festival Exhibition, a memorial to the victims of October 7 murdered at the Nova Festival. The riot outside the Exhibition included lighting flares; waving the flags of Hezbollah and Hamas’s armed al-Qassam Brigades; and screaming and waving signs declaring, “Long live October 7,” “Long live the intifada,” and “The Zionists are not Jews and not humans.”¹²¹ Attendees of the

¹¹⁸ Luke Tress, *Baruch College student groups protest Hillel, in rally decried as antisemitic*, TIMES OF ISRAEL (June 7, 2024), <https://www.timesofisrael.com/baruch-college-student-groups-protest-hillel-in-rally-decried-as-antisemitic/>.

¹¹⁹ Rebecca Massel, *‘Go back to Poland’: Masked UCLA protesters harass Chabad rabbi, threaten his life*, THE FORWARD (June 11, 2024), <https://forward.com/fast-forward/621748/ucla-chabad-rabbi-dovid-gurevich-palestinian-protest/>.

¹²⁰ Adam Sabes, *Several NYC Students for Justice in Palestine groups to hold ‘Citywide Day of Rage for Gaza’*, CAMPUS REFORM (June 10, 2024), <https://www.campusreform.org/article/several-nyc-students-justice-palestine-groups-hold-citywide-day-rage-gaza/25616>.

¹²¹ TOI Staff, *NYC protesters wave terror group flags, call for intifada outside Nova massacre exhibit*, TIMES OF ISRAEL (June 11, 2024), <https://www.timesofisrael.com/nyc-protesters-wave-terror-group-flags-call-for-intifada-outside-nova-massacre-exhibit/>.

Exhibition, which includes survivors of the October 7 terror attacks, were trapped inside the Exhibition until the rioters cleared the area.¹²²



The flag of Hezbollah is featured alongside the flag of Hamas's al-Qassam Brigades outside the exhibit memorializing the Nova Festival victims.¹²³



Smoke bombs are lit outside the exhibit memorializing the Nova Festival victims.¹²⁴

¹²² Steven Vago, Doree Lewak & Matt Troutman, *Oct. 7 survivors describe horror of anti-Israel protesters taunting them at NYC Nova memorial: 'Why do they hate us?'*, N.Y. POST (June 11, 2024), <https://nypost.com/2024/06/11/us-news/oct-7-survivors-describe-horror-of-protests-at-nyc-nova-memorial/>.

¹²³ David Propper, *Anti-Israel mob chanting 'Long live Intifada' lights flares outside NYC exhibit that memorializes Oct. 7 Nova Music Festival victims*, N.Y. POST (June 10, 2024), <https://nypost.com/2024/06/10/us-news/anti-israel-mob-chanting-long-live-intifada-light-flares-outside-nyc-exhibit-that-memorializes-oct-7-nova-music-festival-victims/>.

¹²⁴ *Id.*



Rioters clash with police outside the exhibit memorializing the Nova Festival victims.¹²⁵

98. With the goal of substantially assisting Hamas, Defendants enacted the NSJP Toolkit to incite their followers to join the “Unity Intifada” and support Hamas’s efforts “by any means necessary,” including by sowing chaos, fear, and terror throughout the United States.

ii. *Defendants Continue Their Systematic and Material Support for Hamas*

99. Defendants continue to provide crucial ongoing public relations services to Hamas to generate support for its ongoing terrorism. As a sanctioned FTO, Hamas is prohibited from retaining the services of an American public relations firm. It would similarly be illegally for an American public relations firm to perform services for Hamas and its allies.

100. Defendants AMP and NSJP, under the leadership of individual Defendants, continue to fill this critical gap by providing invaluable communication services that Hamas cannot receive or pay for elsewhere in the United States. This operation to support Hamas is funded by Defendant WESPAC.

101. Defendants do not just parrot Hamas’s talking points but act as its mouthpiece. Indeed, Hamas has regularly adopted Defendants’ propaganda language and framing. For example, by October 2023, Hamas’s Political Bureau, in English, expressly adopted NSJP’s position that

¹²⁵ *Id.*

not only hostage taking, but “everything we do, it is justified.”¹²⁶ By November, Hamas had also begun mirroring NSJP’s message that “settlers are not civilians,” stating, “any person occupying [our] land is a combatant, not a civilian. . . . All the settlers in the Gaza Envelope are armed, so they are all combatants.”¹²⁷ In January 2024, Hamas issued a document in English bearing the title “Our Narrative—Operation Al-Aqsa Flood.” Aside from the fact that the 16-page document echoes the NSJP toolkit in a number of significant ways—particularly the repeated usage of the term “resistance”—the cover of the propaganda book features an image very similar to one of the images provided by NSJP in the NSJP Toolkit for use by its chapters and affiliates.¹²⁸

102. Further, Defendants consistently respond to Hamas and its allies’ calls for mass protests and support. Indeed, Defendants seem to almost always answer the calls from Hamas, and Hamas, in turn, continues to express its organizational appreciation:

- a. On October 30, 2023, Hamas, the PFLP, and several other FTOs made clear that they were, and intended to continue being, engaged in an ongoing terror campaign, calling for the “masses of our people throughout occupied Palestine to escalate all forms of resistance and struggle against the Zionist enemy, targeting its soldiers and settlers.”¹²⁹ At the same time, they addressed their supporters abroad and called for “the free people of the world to continue their movements to stop the American-Zionist

¹²⁶ MEMRI Reports (@MEMRIReports), X (formerly Twitter) (Nov. 1, 2023), <https://twitter.com/MEMRIReports/status/1719662664090075199> (media interview with senior Hamas member and spokesperson Ghazi Hamad).

¹²⁷ *Hamas Official Ayman Shanaa: The Zionists Are Carrying Out A 'Blatant Attack On Civilians' – They Must Be Stopped; On October 7 We Exercised Our 'Legitimate Right' To Liberate Our Land And We Are Willing To Pay The Price*, MEMRI TV, <https://www.memri.org/tv/zionists-attack-civilians-stopped-october-seven-legitimate-right-liberate-pay-price>.

¹²⁸ See Exhibit D; see also Hamas Media Office, *Our Narrative ... Operation Al-Aqsa Flood* (Jan. 21, 2024), <https://www.palestinechronicle.com/wp-content/uploads/2024/01/PDF.pdf>.

¹²⁹ Democratic Front for the Liberation of Palestine, Hamas (Islamic Resistance Movement), Palestinian Islamic Jihad, Popular Front for the Liberation of Palestine, and Popular Front for the Liberation of Palestine – General Command, *Palestinian joint statement: 'Escalate all forms of resistance,'* INTERNATIONAL ACTION CENTER, <https://iacenter.org/2023/10/31/palestinian-joint-statement-escalate-all-forms-of-resistance/>.

aggression.”¹³⁰ *The next day*, NSJP responded by advertising a “Week of Action for Gaza.”¹³¹

- b. On November 4, 2023, both AMP and NSJP co-sponsored the National March on Washington: Free Palestine in Washington D.C.¹³² *The next day*, the PFLP called for its supporters “to continue the unprecedented mass mobilizations in the capitals and cities of the world, especially in the United States, Britain, France and Berlin ... These have proven their effectiveness and strong impact, and what we are witnessing of changes in the official Western discourse indicates the strength and impact of this pressure and confirms that we are facing important transformations in public opinion.”¹³³ *That same day*, NSJP happily obliged and announced its next event, a Shut it Down for Palestine campaign, scheduled for November 9, 2023.¹³⁴
- c. On November 9, 2023, Hamas, in an announcement on its Telegram channel, renewed its call for people to protest in its name and to “escalate their demonstrations” to put pressure on the U.S. government. *That day*, NSJP held a nationwide “Shut It Down for Palestine” event and announced a training session for how to build new SJP chapters.¹³⁵
- d. On November 12, 2023, Osama Hamdan, a member of Hamas’s Political Bureau, gave a press conference in Beirut, Lebanon, that was aired on Al-Jazeera Network (Qatar), in which he said that “we salute and thank” the people protesting on behalf of Hamas because “the activity of the angry masses on all the continents of the world is a very important matter that has a large impact in pressuring the decision-makers in the world.” He urged them to “increase their activity.”¹³⁶ *The next day*, NSJP announced another

¹³⁰ *Id.*

¹³¹ National SJP (@nationalsjp), INSTAGRAM, https://www.instagram.com/p/CzENKGiLKdO/?img_index=1 (last visited Apr. 29, 2024).

¹³² March on Washington for Gaza, <https://march4gaza.org/>; *see also* National SJP (@nationalsjp), INSTAGRAM, <https://www.instagram.com/p/CzJpfK4rrgg/> (last visited Apr. 29, 2024).

¹³³ Popular Front for the Liberation of Palestine, *Popular Front for the Liberation of Palestine: ‘We are on the threshold of achieving a historic victory,’* INTERNATIONAL ACTION CENTER (released on Nov. 5, 2024), <https://iacenter.org/2023/11/10/popular-front-for-the-liberation-of-palestine-we-are-on-the-threshold-of-achieving-a-historic-victory/>.

¹³⁴ The People’s Forum (@peoplesforumnyc) & National SJP (@nationalsjp), INSTAGRAM, https://www.instagram.com/p/CzRnaL9gYCb/?img_index=1 (last visited Apr. 29, 2024).

¹³⁵ National SJP (@nationalsjp), INSTAGRAM, https://www.instagram.com/p/CzKGAE3pezX/?img_index=1; <https://www.instagram.com/p/CzcbFIHMBGq/> (last visited Apr. 30, 2024).

¹³⁶ *Hamas Official Osama Hamdan: Israel Is A Threat To Humanity, A Neo-Nazi, Sadistic, Racist Entity; I Call On All The Free People Of The World To Increase Their Activity In Solidarity With Palestinians*, MEMRI TV (Nov. 12, 2023), <https://www.memri.org/tv/hamas->

Shut It Down for Palestine event to be scheduled on November 17, 2023, and released a new toolkit to help their chapters mobilize.¹³⁷

- e. On November 22, 2023, Hamas extended its “thanks and appreciation” to its supporters abroad and called on them to continue “activating demonstrations in all capitals, in front of embassies and by activating economic boycotts.” *That day*, AMP responded by advertising and encouraging its members to sign up for AMP’s training session known as “Campus Activism Track,” a special intense workshop for indoctrinating new followers, complete with financial incentives for attendance.¹³⁸
- f. On November 28, 2023, Hamas extended “sincere greetings and great appreciation” to their supporters abroad, “who continue their activism and events in rejection of the aggression and genocide against our people.” Hamas “call[ed] on [Defendants] to increase their movement, interaction, solidarity, and support by all possible means, on this day and the coming days.”¹³⁹ *The next day*, NSJP announced an “International Day of Solidarity with the Palestinian People” urging more demonstrations and more “demands on your campuses, in your workplaces, and in your communities.”¹⁴⁰ *The day after that*, NSJP announced another training on how to build new SJP chapters in order to “expand [its] efforts in this critical moment, and pressure our institutions.”¹⁴¹
- g. On December 7, 2023, Hamas (in a statement on its Telegram channel) urged its supporters in “all cities, capitals and squares” to “escalate their

[official-osama-hamdan-calls-people-world-increase-solidarity-gaza-israel-neo-nazi-sadistic-threat-humanity](#).

¹³⁷ National SJP (@nationalsjp), INSTAGRAM, <https://www.instagram.com/p/CznH6uDNqhl/?igsh=MzRIODBiNWFIZA%3D%3D> (last visited Apr. 29, 2024).

¹³⁸ Palestine Convention, Campus Activism Track (CAT), <https://www.palestineconvention.org/cat/> (last visited Apr. 30, 2024); Campus Activism Track (@cat_amp), INSTAGRAM, https://www.instagram.com/cat_amp/ (last visited Apr. 30, 2024).

¹³⁹ Hamas, *Hamas’s Message to World Movement: ‘Increase Interaction, Solidarity, by All Possible Means’*, WORKERS WORLD (Nov. 29, 2023), <https://www.workers.org/2023/11/75252/>.

¹⁴⁰ National SJP (@nationalsjp), INSTAGRAM, <https://www.instagram.com/p/C0PuWfjuPTv/?igsh=MzRIODBiNWFIZA==> (last visited Apr. 29, 2024).

¹⁴¹ National SJP (@nationalsjp), INSTAGRAM, <https://www.instagram.com/p/C0SUiC1ufhb/?igsh=MzRIODBiNWFIZA==> (last visited Apr. 29, 2024).

global mass movement.”¹⁴² *Two days later*, Defendant NSJP organized a “Shut it Down! For Palestine” event.¹⁴³

- h. On December 10, 2023, Hamas announced that “We commend the global movement advocating for a comprehensive strike, tomorrow, Monday, December 11, 2023. We invite all the free people of the world to participate widely in it...We also call for the continuation and escalation of all forms of mass marches and public demonstrations, in cities, capitals, and squares around the world, condemning the American support...”¹⁴⁴ *That day*, NSJP posted a call for its followers to participate in a Global Strike for Palestine on December 11, 2023—just like Hamas had asked them to.¹⁴⁵

iii. *Strike4Gaza: The IRGC’s Blockade in the United States*

103. Defendants are just as responsive to Hamas’s puppet masters, the IRGC. In March 2024, the IRGC internally disseminated a secret memorandum titled “Supporting and Encouraging Palestinian Movements towards the Political Isolation of Zionism” that called for “an economic blockade across four continents in solidarity with Palestinians” to take place on April 15, 2024.¹⁴⁶

104. The memorandum leaked on the day of the planned blockade.

105. Before the leak, Hamas and the IRGC’s subordinates received their marching orders and were prepared to carry out the IRGC’s intended attack on American infrastructure and economy. Metadata confirms that websites dedicated to organizing and supporting the IRGC’s terrorist blockade were purchased and created weeks prior to the blockade, meaning Defendants’

¹⁴² Mario Nawfal (@MarioNawfal), X (formerly Twitter) (Dec. 8, 2023) <https://twitter.com/MarioNawfal/status/1733044753954906154>.

¹⁴³ National SJP (@nationalsjp), INSTAGRAM, <https://www.instagram.com/p/C0oocwmg22h/?igsh=MzRIODBiNWFIZA==> (last visited May 1, 2024).

¹⁴⁴ Hamas, *Monday, Dec. 11 global #StrikeForGaza*, INTERNATIONAL ACTION CENTER (Dec. 10, 2023), <https://iacenter.org/2023/12/10/monday-dec-11-global-strikeforgaza/>.

¹⁴⁵ National SJP (@nationalsjp), INSTAGRAM, <https://www.instagram.com/nationalsjp/p/C0sKjv1O0o-/> (last visited Apr. 29, 2024).

¹⁴⁶ See **Exhibit E**; see also *Leaked Document Reveals IRGC’s Role in Global Anti-Israel Campaign*, IRAN INT’L NEWS (Apr. 15, 2024), <https://www.iranintl.com/en/202404158853>.

“Strike4Gaza” planning and propaganda materials were disseminated before the IRGC’s memorandum was leaked.¹⁴⁷

106. Local AMP and SJP chapters across the United States parroted the “Strike4Gaza” materials and made identical calls for mass disruption of American infrastructure on April 15, 2024.

107. On April 15, 2024, “Strike4Gaza” protests erupted across American cities and, just as the IRGC called for, created an “economic blockade” disrupting American economic and transportation centers, such as the Golden Gate Bridge, the Brooklyn Bridge, Chicago-O’Hare International Airport, and the New York Stock Exchange. Again, Defendants attacked—and recruited others to attack—American citizens, institutions, and systems to foment a culture of fear to, with the aid of the IRGC, provide material support to Hamas.

108. Defendants did so at the behest of Hamas and the IRGC.

iv. *Chaos at Columbia and the “Popular University”*

109. Despite NSJP’s chapter being “suspended” from Columbia University in November 2023, Defendants have been particularly successful at fomenting terror, sowing discord, and disrupting campus life at Columbia University.

110. On April 17, 2024, students and external collaborators launched a “Gaza Solidarity Encampment” (“**Encampment**”) that illegally camped on Columbia University’s campus and disrupted university activities.¹⁴⁸ The Encampment began the same day that senior Columbia

¹⁴⁷ See **Exhibit F**.

¹⁴⁸ Yale University’s SJP Chapter established its own “encampment” during which one Jewish student, the editor-in-chief of the Yale Free Press, was stabbed in the eye with a Palestinian flag by a protester. According to reports, “she and a friend were signaled out for wearing Hasidic Jewish attire as the crowd formed a blockade around them to interfere with their filming.” The victim subsequently sought medical attention. Ronny Reyes, *Jewish Yale Student Journalist*

University administrators were scheduled to speak before the U.S. House of Representatives about the ongoing antisemitism problem on their campus.

111. The Encampment was, consistent with Hamas and the IRGC's propaganda and disruption, meant (1) to force Columbia University to capitulate to their demands to operate with impunity without the same expectations of conduct demanded of all other students; (2) to apply political pressure on elite American institutions and on Congress to influence U.S. government policy, demonize Israel, and support Hamas; and (3) to terrorize Jewish students. It is worth noting that Hamas seeks the destruction of the entirety of global Jewry.

112. The Encampment was well-supplied with identical tents, toiletries, food, and professional signage. The Encampment was organized by, among others, "Columbia University Apartheid Divest, Students for Justice in Palestine, and Jewish Voice for Peace,"¹⁴⁹ to aid and abet Hamas and IRGC through the disruption of major American academic institutions until their demands were met.

113. On April 18, 2024, "[o]ut of an abundance of concern for the safety of Columbia's campus, [Columbia's President] authorized the New York Police Department to begin clearing the Encampment." The NYPD arrested more than 100 collaborators, including non-students, at the Encampment.¹⁵⁰

Stabbed in the Eye with Palestinian Flag During Protest, NEW YORK POST (Apr. 21, 2024), <https://nypost.com/2024/04/21/us-news/jewish-yale-student-stabbed-in-the-eye-with-palestinian-flag-during-protest/>.

¹⁴⁹ Kanishka Singh, *Over 100 pro-Palestinian protesters arrested from New York's Columbia campus*, REUTERS (Apr. 19, 2024), <https://www.reuters.com/world/us/over-100-pro-palestinian-protesters-arrested-new-yorks-columbia-campus-2024-04-19/>.

¹⁵⁰ Dion Pierre, *Ilhan Omar Silent After Daughter's Arrest, Suspension for Role in Columbia University Anti-Israel Protest*, THE ALGEMEINER (Apr. 19, 2024) <https://www.algemeiner.com/2024/04/19/ilhan-omar-silent-daughters-arrest-suspension-role-columbia-university-anti-israel-protest/>.

114. Meanwhile, calls for the indiscriminate and intentional murder of civilians continued outside the gates of the university. One masked Hamas supporter, draped in a Palestinian flag, shouted, “Never forget the 7th of October! Are you ready? 7th of October is about to be every day. Every day. 7th of October is going to be every day for you.”¹⁵¹

115. The next day, on April 19, NSJP posted:

TO ALL CHAPTERS: THIS IS A CALL TO ACTION!

Our universities have chosen profit and reputation over the lives of the people of Palestine and the will of their students. [Columbia] President Minouche Shafik’s cowardly testimony to Congress heralds an unfortunate shift: university administrators have capitulated to the pressure of the Zionist lobby and allied Right Wing, selling out the Student Movement for Palestinian liberation to save face in the eye of the state.

We know, however, that the supposed power of these administrators pales in comparison to the combined strength of the students, staff, and faculty committed to realizing justice and upholding Palestinian liberation on campus. In the footsteps of our comrades at Rutgers-New Brunswick SJP, Tufts SJP, and now Columbia SJP, we call on all SJPs across the nation to take back the university and force the administration to divest for the people of Gaza!

BE READY FOR AN INTERNAL CALL FOR IMMEDIATE NEXT ACTION ITEMS! REPOST ON YOUR SOCIALS TO CIRCULATE THIS NATIONAL CALL TO ACTION.¹⁵²

116. When NSJP refers to “liberation,” is not referring to an “abstract concept” but a demand to join the Unity Intifada “by any means necessary,” including physical violence.

117. A video posted by *Columbia Sundial* editor-in-chief Jonas Du of the area outside the gates of Columbia University on April 19, 2024, features one man in a red keffiyeh shouting,

¹⁵¹ Michael Starr, ‘October 7 is about to be every day’: Columbia rally sees Hamas support, JERUSALEM POST (Apr. 21, 2024), <https://www.jpost.com/diaspora/antisemitism/article-798049>.

¹⁵² National SJP (@nationalsjp), Instagram, <https://www.instagram.com/p/C580sAZONce/?igsh=MzRIODBiNWFIZA%3D%3D> (last visited Apr. 29, 2024).

“Remember the 7th of October! That will happen not one more time, not five more times, not 10 more times, not 100 more times, not 1000 more times, but 10,000 times!”¹⁵³

118. The next day, activities at the Encampment escalated.

119. The Encampment—organized, funded, and managed by Defendants—was knowingly and expressly intended to support Hamas.

120. Chants at the Encampment included:

- a. “Al-Qassam, you make us proud!”
- b. “We say justice, you say how? Burn Tel Aviv to the ground!”
- c. “Hamas, we love you. We support your rockets, too!”
- d. “Red, black, green, and white, we support Hamas’ fight!”
- e. “A right to rebel, Al-Qassam, give them hell!”
- f. “It is right to rebel, Hamas give them hell!”

121. One member of the Encampment identified Jews on Columbia’s campus as “Al-Qassam’s Next Target.”¹⁵⁴

122. Leaders of the Encampment further declared that it was

the Al-Aqsa Flood [the October 7 terrorist attack] that put the Global Intifada back on the table again. And it is the sacrificial spirit of the Palestinian Freedom Fights [Hamas] that will guide every struggle on every corner of the earth to victory. . . . Remember that Militancy breeds Resistance. Thousands upon thousands of students around the world have been moved to rebel because of your militancy.¹⁵⁵

123. Defendants’ efforts to terrorize Jews have been successful in forcing Jews to flee campus. In response to the chaos and violence orchestrated and fomented by Defendants, Hillel’s

¹⁵³ Starr, *supra* note 152.

¹⁵⁴ Michael Starr, ‘Burn Tel Aviv to the Ground.’ *Calls for Violence Continue at Columbia*, THE JERUSALEM POST (Apr. 21, 2024), https://www.jpost.com/diaspora/antisemitism/article-798160#google_vignette.

¹⁵⁵ *Id.*

Rabbi Eli Buechler, the Director of Orthodox Union-Jewish Learning Initiative on Campus at Columbia/Barnard, sent the following message to Jewish students:

Dear [Student],

What we are witnessing in and around campus is terrible and tragic. The events of the last few days, especially last night, have made it clear that Columbia University's Public Safety and the NYPD cannot guarantee Jewish students' safety in the face of extreme antisemitism and anarchy.

It deeply pains me to say that I would strongly recommend you return home as soon as possible and remain home until the reality in and around campus has dramatically improved.

It is not our job as Jews to ensure our own safety on campus. No one should have to endure this level of hatred, let alone at school.

If you need assistance, please reach out to me.

May we see better days on campus soon.

Chag Kasher vSameach,
Rav Eli Buechler
Director OU-JLIC at Columbia/Barnard

124. Some Jewish students at Columbia recognized the danger they faced and requested the ability to study and attend class remotely.¹⁵⁶

125. NSJP also expressed an intent to bring this terror regime to all campuses across the country through a new program, Popular University for Gaza. On April 20, 2024, NSJP stated:

PS WE ARE ALL SJP! PS Our universities have chosen profit and reputation over the lives of the Palestine and our will as students. The supposed power of our administrators is nothing compared the strength of the united students, staff, and faculty committed to realizing justice and upholding Palestinian liberation on campus. In the footsteps of our comrades, at Rutgers-New Brunswick SJP, Tufts SJP, and now Columbia SJP, we will seize our universities and force the

¹⁵⁶ Cayla Bamberger, *Jewish students at Columbia University ask to study remotely as pro-Palestinian demonstrations continue*, N.Y. DAILY NEWS (Apr. 19, 2024), <https://www.nydailynews.com/2024/04/19/students-at-columbia-university-continue-pro-palestinian-demonstration-day-after-mass-arrests/>.

administration to divest, for the people of Gaza! Join the Popular University, take back our institutions!¹⁵⁷

126. Defendants' actions at Columbia only escalated. For example, on April 29, 2024, Defendants' mob seized Hamilton Hall, barricading the doors, blocking entrances, smashing windows, and zip-tying the doors shut,¹⁵⁸ prompting the New York Police Department to sweep the building. The next day, Columbia personnel disassembled the Encampment.

127. Columbia SJP continued to post pro-Hamas propoganda and repeat Hamas' rhetoric on its social media.¹⁵⁹ For instance, on May 27, 2024, SJP chapters at Columbia, Harvard, Princeton, Yale, and the University of Pennsylvania released the same message on their respective Instagrams, in both English and Arabic, calling for "an open intifada in every capital and every city":

Escalate disruption and confrontation across historic Palestine, from every checkpoint and street corner to the face of every settler and soldier. Escalate protests to an open intifada in every capital and city in order to deprive the world from[sic] its heavy slumber that comes at the expense of the bodies and remains of those who survive; disrupt all facets of daily life until our people can breathe freely without the taint of the Israeli, American, and European war machine.¹⁶⁰

128. Columbia SJP uses Telegram as its chief medium to spread Hamas's message. On or around May 29, 2024, Columbia SJP posted a message on its Telegram group from the Resistance News Network (an FTO-affiliated Telegram chat) which provided a "guide on the

¹⁵⁷ National SJP (@nationalsjp), INSTAGRAM, https://www.instagram.com/p/C5_GEIWuo0D/, (last visited July 7, 2024).

¹⁵⁸ Aviva Klompas (@AvivaKlompas), X (formerly Twitter) (Apr. 30, 2024, 7:15 AM), <https://twitter.com/AvivaKlompas/status/1785266759366226128>.

¹⁵⁹ Ahmed Fouad Alkhatib (@afalkhatib), X (formerly Twitter) (May 10, 2024, 2:56 AM), <https://x.com/afalkhatib/status/1788825504264695935>.

¹⁶⁰ Columbia SJP (@sjp.columbia), INSTAGRAM, https://www.instagram.com/p/C7erJ8_xQpi/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA== (last visited July 7, 2024).

different factions of the Palestinian resistance.” The message continued, “What one must understand is the Palestinian resistance is not isolated to one religion or ideology, nor is it only comprised of the Islamic Resistance Movement Hamas. Educate yourself and render yourself immune to Zionist propaganda.” The message included a graphic describing an array of jihadist factions, including the designated FTO Al-Aqsa Martyrs Brigade, operating within both the West Bank and Gaza. The graphic described each faction as if it were a traditional military force, complete with “notable figures.”

129. On May 10, 2024, at an event that including Hamas, PFLP, and PIJ leadership, PFLP Deputy Secretary-General Jamil Mezher praised the “university intifada,” urged its expansion, and called them “a model to be emulated in order to triumph for Palestine and its people.” *That very day*, one of NSJP’s affiliates, the Palestinian Youth Movement (“PYM”),¹⁶¹ posted a communique urging the Student Intifada to become “a revolutionary force ... beyond the campus and into the street.”¹⁶²

130. At the end of May 2024, Columbia SJP circulated a message from Resistance Archives, an FTO-affiliated Telegram network, glorifying Hamas terrorists. The post included a propaganda video of Hamas terrorists with the message: “These men will never be defeated.”

131. On June 2, 2024, Columbia SJP posted on its Instagram a series of slides stating:
- a. “WE WILL BE BACK, INSTALLATION 1, COMPLETE”
 - b. “WE KNOW THAT OUR MOVEMENT IS NOT CONFINED TO ONE BUILDING OR ONE LAWN, BUT RATHER, WE KNOW THE PEOPLE

¹⁶¹ National SJP (@nationalsjp), Instagram (June 26, 2024), https://www.instagram.com/p/C8r1u25OM9S/?img_index=1 (“Our efforts are channeled through our organizations: prominent among them the Palestinian Youth Movement, Within Our Lifetime, the US Palestinian Community Network, and Students for Justice in Palestine, lead our fight ideologically, politically, and materially.”).

¹⁶² Palestinian Youth Movement (@palestiniayouthmovement), INSTAGRAM (May 10, 2024), https://www.instagram.com/p/C6zQbrouJW4/?img_index=9.

OF GAZA ARE THE LIFEBLOOD OF OUR STRUGGLE AND *THAT THEY HAVE SPARKED THE STUDENT INTIFADA*”

- c. *“WE RECOMMIT TO CONTINUE STRATEGIC, TARGETED ATTACKS ON ALL ASPECTS OF UNIVERSITY LIFE”*
- d. *“WE ASK THAT STUDENTS ACROSS THE GLOBE PLEDGE TO DISRUPT ALL ASPECTS OF UNIVERSITY LIFE”*
- e. *“AS WE BEGIN OUR SUMMER OF DISRUPTION, WE ASK THAT EVERY STUDENT, AND OUR WIDER COMMUNITY, DOES THE SAME. USE THIS TIME TO AGITATE, EDUCATE, AND ESCALATE”*
- f. *“UNTIL VICTORY AND WITH MORE INSTALLATIONS TO COME, REVOLT FOR RAFAH-LONG LIVE THE STUDENT INTIFADA.”*¹⁶³

132. As promised, Defendants replicated their pressure campaign, providing significant substantial assistance to promote Hamas’s aims at Columbia and beyond. Since then, Defendants have taken their substantial assistance to universities across the country. In total, more than 100 universities have suffered encampments because of Defendants’ actions.

133. Defendants’ tactics, which include physical violence and the provision of public relations services for multiple FTOs, are designed to coerce American institutions and government policy to their will.

H. DEFENDANT NSJP SERVED AS A “CONVENING ORGANIZATION/STEERING COMMITTEE” MEMBER FOR A LARGE-SCALE PRO-TERRORISM CONFERENCE.

134. From May 24 to 26, 2024, NSJP served as one of the “convening organizations” or “steering committee” members for the People’s Conference for Palestine (the “**Conference**”), a Hamas propaganda and recruiting festival.

¹⁶³ Columbia SJP (@sjp.columbia), INSTAGRAM, https://www.instagram.com/p/C7vGrokNQ1t/?hl=en&img_index=1 (last visited July 7, 2024).

135. The Conference hosted multiple speakers from PFLP, including Sana Daqqah, the Conference’s keynote speaker and the wife of Walid Daqqah, a PFLP terrorist convicted of the kidnapping, torture, and murder of Israeli Moshe Tamam.¹⁶⁴

136. In addition to featuring various FTO mouthpieces, the Conference celebrated convicted terrorists throughout the event.

137. Sarah Abdelshamy, one of PYM’s organizers for the Conference, glorified the terror attacks of October 7 while on a panel. “In the past eight months, we’ve seen incredible images of victory—from witnessing the families of political prisoners reunite with, and embrace their loved ones for the first time in years—to scenes of our heroic people breaking down the siege that has suffocated the Gaza Strip for 17 years.” She continued, “[t]his is a protracted people’s war of liberation” and the “only one that is capable of sustaining it is the Palestinian resistance, which will continue to fight until liberation from the river to the sea.”¹⁶⁵

138. In the same vein, PYM organizer Mohammed Nabulsi led attendees in a chant of “There is only one solution, intifada revolution!” and stated at the opening ceremony on Friday, “We also want to take a moment to honor our brave and noble resistance that defends our people from beneath the ground,” a reference to the Hamas tunnels where Israeli hostages, including women and children, are currently being held captive.¹⁶⁶

139. In another speech, PYM organizer Yara Shoufani declared, “The Palestinian resistance,” led and controlled by Hamas, “has demonstrated to our people, to our enemy, and to the entire world the meaning of dignity, of honor, of resilience, and of glory.”¹⁶⁷

¹⁶⁴ Michael Starr, *Rashida Tlaib attends conference honoring terrorists, hosting terrorist speaker*, JERUSALEM POST (May 26, 2024), <https://www.jpost.com/international/article-803703>.

¹⁶⁵ *Id.*

¹⁶⁶ *Id.*

¹⁶⁷ @thestustustudio, X (formerly Twitter) (May 25, 2024, 8:10 AM), <https://x.com/thestustustudio/status/1794340367254364483>.

140. Ms. Shoufani continued by glorifying the strong connection between attendees and Hamas martyrs and their shared commitment to “revolution.”

We must be relentless in confronting Zionism and committing ourselves fully to the path of Palestinian revolution. For it is the Palestinian Revolution that brings us together today. . . .¹⁶⁸

Our struggle is a long struggle and one that stands on the shoulders of thousands of martyrs and thousands of fighters who have committed and who are committing their lives on the ground for the revolution we see ahead of us today. It is in this tradition that we convene here and commit ourselves to the road ahead.¹⁶⁹

141. Ms. Shoufani acknowledged that the purpose of the Conference was to “build relationships that allow for higher coordination across the movement.”¹⁷⁰

142. She noted the impact that NSJP and AMP-organized protests have had on American politics, announcing to the audience in a congratulatory tone, “We have made the situation untenable for the empire’s ruling classes and the political establishment. Not allowing Biden a minute of peace. Making it so that he cannot visit a single city, not to campaign, not to fundraise, without being disrupted.”¹⁷¹

143. Ashraf Hazayen, another member of PYM, clarified the role of organizations like PYM, NSJP, and AMP. “We in the Palestinian Youth Movement see that a really important part of our role in the diaspora is internationalizing the popular cradle, that is, mirroring the popular

¹⁶⁸ @thetustustudio, X (formerly Twitter) (May 25, 2024, 8:11 AM), <https://x.com/thetustustudio/status/1794340566286598281>.

¹⁶⁹ @thetustustudio, X (formerly Twitter) (May 25, 2024, 8:16 AM), <https://x.com/thetustustudio/status/1794341654964420706>.

¹⁷⁰ @thetustustudio, X (formerly Twitter) (May 25, 2024, 8:14 AM), <https://x.com/thetustustudio/status/1794341182434062339>.

¹⁷¹ @thetustustudio, X (formerly Twitter) (May 25, 2024, 8:12 AM), <https://x.com/thetustustudio/status/1794340736785138149>.

support for Palestinian resistance that we see in Palestine across our organizing efforts in the diaspora.”¹⁷² In other words—public relations services.

144. Another speaker, Roua Daas, an organizer with Pennsylvania State University’s SJP Chapter, admitted, “We have worked to agitate our campuses” and “students have brought the war home.”¹⁷³

145. According to Ms. Daas, “It is our people that guide us. Our people have made the ultimate sacrifice. And we know that nothing—no arrest, no repression, no suspension, no nothing—will ever, ever, ever even come close to that. ... Our people in Gaza as a guide of our movement, as a guide of our actions, is not just something that we as the student movement say abstractly. Right? It is something that we use to guide us. It is something that is not only in our messaging, but is in our strategy, in our tactics—in every part of our organizing.”¹⁷⁴ “Our people,” in this context, refers to the organizations controlling all messaging in Gaza— Hamas.

146. The notion that “our people” refers to Hamas is further buttressed by the fact that “our people in Gaza have told us they see and feel the impact.”¹⁷⁵ Only one organization in Gaza publicly has signaled approval and support *repeatedly* for the widespread riots in the United States: Hamas.

147. At its core, the Conference was a political and fundraising event for Hamas and its acts of international terrorism. It cements, and was seemingly intended to cement, AMP and

¹⁷² Starr, *supra* note 165.

¹⁷³ @thetustustudio, X (formerly Twitter) (May 27, 2024, 12:22 PM), <https://x.com/thetustustudio/status/1795128201905049937>.

¹⁷⁴ @thetustustudio, X (formerly Twitter) (May 27, 2024, 12:22 PM), <https://x.com/thetustustudio/status/1795128531573256221>.

¹⁷⁵ @thetustustudio, X (formerly Twitter) (May 27, 2024, 12:23 PM), <https://x.com/thetustustudio/status/1795128650028732575>.

NSJP's prior representation in the NSJP Toolkit that they are not merely in solidarity with Hamas, but "PART of" Hamas's terrorist movement.

148. During the Conference, Hamas ally and sponsor Iranian Supreme Leader Ali Khamenei published a letter declaring that NSJP-led and Student Intifada its controls has "now formed a branch of the Resistance Front ... The greater Resistance Front which shares the same understandings and feelings that you have today, has been engaged in the same struggle for many years in a place far from you ... and the establishment of the government of the Islamic Republic of Iran expanded and fortified it."¹⁷⁶ The "Resistance" in this context refers to radical terrorist organizations within the ambit and control of Iran, including most notably Hamas.

149. When someone tells you they are aiding and abetting terrorists, *believe them*.

I. *HAMAS AND ITS ALLIES PUBLICLY RECOGNIZE DEFENDANTS' SUBSTANTIAL ASSISTANCE*

150. On October 29, 2023, Hamas applauded and celebrated "the masses who demonstrated in American cities and Western capitals in solidarity with Gaza."¹⁷⁷ Many of those demonstrations were orchestrated and coordinated by Defendants. Hamas also called on its followers, including Defendants, to "continue their movement in solidarity with the Gaza Strip and in support of the justice of our national cause, and to escalate all forms of popular pressure."

¹⁷⁶ Ali Khamenei, *As the Page of History is Turning, You are Standing on the Right Side of It*, English.Khamenei.Ir (May 30, 2024), <https://english.khamenei.ir/news/10823/As-the-page-of-history-is-turning-you-are-standing-on-the-right>; see also *You Have Formed a Branch of Resistance Front* (June 1, 2024), <https://english.khamenei.ir/news/10828/You-have-formed-a-branch-of-Resistance-Front>; @Khamenei_m, X (formerly Twitter) (May 30, 2024, 9:27 AM), https://x.com/khamenei_m/status/1796171558035038495?s=61.

¹⁷⁷ Mario Nawfal (@MarioNawfal), X (formerly Twitter) (Oct. 29, 2023, 2:06 PM), <https://twitter.com/MarioNawfal/status/1718690673749103082>.

151. On January 21, 2024, Mr. Mashal, the current leader of Hamas’s diaspora office and founder of IAP, declared support from its American allies in the wake of October 7 evidences the renewal of Hamas’s vision—the end of the state of Israel.¹⁷⁸

152. Others in contact with Hamas have echoed the same sentiment. On March 24, 2024, a group of pro-terror student organizations at Columbia University hosted an event called “Resistance 101.” Among the invited speakers were Charlotte Kates (“**Kates**”), a member of Samidoun, an internationally-designated terrorist organization,¹⁷⁹ , Khaled Barakat (“**Barakat**”), a PFLP terrorist leader,¹⁸⁰ and Sean Eren (“**Eren**”), a member of the NSJP steering committee.

- a. Mr. Eren, speaking on behalf of NSJP, lamented that he and his friends must worry about being jailed if they so much as contact members of Hamas. He explained that the threat of this scenario constantly looms in front of them.
- b. Mr. Barakat then told the group that *when he speaks with his “friends and brothers in Hamas, the PIJ, the PFLP” and other terrorist organizations operating in Gaza, he learns that the terrorists care more about the support they receive from American students protesting on their behalf than they do about what the President or Vice President of the United States says or does.* Mr. Barakat told the group—per his “friends and brothers” in Hamas, the PFLP, and others—that every demonstration American students do matters and that their “work” is more important than ever. Mr. Eren responded with applause and cheers.
- c. Ms. Kates explained that it was important for everyone to support Hamas because Hamas terrorists took the necessary actions (*i.e.*, raping, murdering, dismembering, and kidnapping innocent men, women, and children) to liberate Palestine. In the words of Ms. Kates, “There is nothing wrong with being a member of Hamas, being a leader of Hamas, being a fighter in Hamas, these are the people that are on the front lines defending Palestine and fighting for its liberation.” Ms. Kates encouraged the audience to fight

¹⁷⁸ *Hamis Leader Abroad Khaled Mashal: ‘We Reject The Two-State Solution; October 7 Proved That Liberating Palestine From The River To The Sea Is Realistic And Has Already Begun’*, MEMRI TV (Jan. 22, 2024), <https://www.memri.org/reports/hamas-leader-abroad-khaled-mashal-we-reject-two-state-solution-october-7-proved-liberating>.

¹⁷⁹ CANARY MISSION, Charlotte Kates, https://canarymission.org/individual/Charlotte_Kates (last visited July 9, 2024).

¹⁸⁰ CANARY MISSION, *Khaled Barakat*, https://canarymission.org/individual/Khaled_Barakat, (last visited Apr. 30, 2024).

alongside Hamas. Throughout her soliloquy, Mr. Eren nodded and clapped in support.

153. On March 30, 2024, Mr. Barakat gave another interview with Al-Manat TV (Hizbullah-Lebanon) in which he explained that the protesters in the West, with their chants to “Free Palestine from the River to the Sea,” are providing popular, political, and media support for the armed resistance.¹⁸¹

154. The Islamic Republic of Iran, the PFLP, Al-Qaeda, and Hezbollah also have issued statements supporting Defendants and student efforts to support their terrorist allies, including Hamas.¹⁸²

155. On May 31, 2024, Hassan Nasrallah, the Secretary General of Hezbollah (an Iranian-funded and supported terrorist organization based in southern Lebanon), echoed the same sentiment, recognizing and lauding American students for their membership in the “resistance axis.” On June 11, Hezbollah MP Mohammad Raad, the leader of Hezbollah’s Loyalty to the Resistance parliamentary bloc said that Hezbollah should “invest” in these students.¹⁸³

J. CONCERN GROWS OVER DEFENDANTS’ MATERIAL SUPPORT FOR HAMAS

156. Defendants’ assistance to Hamas has not gone unnoticed. On October 31, 2023, Virginia Attorney General Jason Miyares announced that the Office of the Attorney General’s Consumer Protection Section had “opened an investigation into AJP Educational Foundation, Inc.,

¹⁸¹ *Canada-Based Former Senior PFLP Official Khaled Barakat On Hizbullah TV: American And Canadian Protesters Support Armed Resistance, Elimination Of Israel; BDS Serves The Armed Resistance, But Cannot Substitute It*, MEMRI TV (Apr. 5, 2024), <https://www.memri.org/reports/canada-based-former-senior-pflp-official-khaled-barakat-hizbullah-tv-american-and-canadian>.

¹⁸² See **Exhibit G**.

¹⁸³ *Hizbullah Official Mohammad Raad: We Should Invest in the Pro-Palestine Student Protesters in Western Universities in Order to Enter the Heart of Western Societies*, MEMRI TV (June 20, 2024), <https://www.memri.org/reports/hizbullah-official-mohammad-raad-we-should-invest-pro-palestine-student-protesters-western-0>.

also known as American Muslims for Palestine, for potential violations of Virginia’s charitable solicitation laws.” Among other things, “the Attorney General will investigate allegations that the organization may have used funds raised for impermissible purposes under state law, ***including benefitting or providing support to terrorist organizations.***”¹⁸⁴

157. Rather than comply with Virginia Attorney General Miyares’ subpoena, AMP filed a lawsuit against him in the Circuit Court for the City of Richmond. The first hearing in that case is now set for mid-July 2024.

158. As Paul Moore, former chief investigative counsel at the U.S. Department of Education, stated on November 14, 2023, when urging for the removal of SJP chapters from college campuses, “University administrators are obligated to protect academic freedom and the free expression of controversial viewpoints, but that obligation must end when student groups openly engage in intimidation, physical violence, and advocate the destruction of a nation.”¹⁸⁵ Mr. Moore’s sentiment is particularly true when the intimidation, violence, and dissemination of rhetoric are deliberate ways to provide material support to an FTO.

159. The next day, in his November 15, 2023, opening statement to the House Ways & Means Committee *Hearing on the Nexus Between Terror Financing, Tax-Exempt Charities, & Antisemitism*, Chairman Jason Smith (R-MO) stated:

Shockingly, a 501(c)(3) entity called American Muslims for Palestine, and its related (c)(4), have been sued in federal court for operating as an alter ego of the Holy Land Foundation. The two groups have many of the same leaders and may be continuing the same efforts to support Hamas.

Second, the eruption of hatred toward Jewish students on college campuses after the October 7th attack has been disturbing to watch. But the organization around it is not some organic movement – it has been carefully built over years, in part, by

¹⁸⁴ VA Investigation, *supra* note 42 (emphasis added).

¹⁸⁵ Paul Moore, *All Colleges Should be Banning Students for Justice in Palestine*, THE HILL (Nov. 14, 2023), <https://thehill.com/opinion/education/4306667-all-colleges-should-be-banning-students-for-justice-in-palestine/>.

American Muslims for Palestine. They helped build, shape, and train a group called Students for Justice in Palestine or SJP. Many SJP events have involved pro-Hamas slogans and have led to intimidation, harassment, and violence against Jewish students.¹⁸⁶

160. Smith further reiterated that

[o]ne of the radical groups pushing Hamas propaganda and organizing hate-filled rallies on college campuses is Students for Justice in Palestine. It's the student wing of American Muslims for Palestine, which has been sued in federal court for operating as an alter ego of an organization that funneled \$12.4 million from Americans to fund Hamas before it was shut down by the U.S. government back in the early 2000s.¹⁸⁷

161. On April 22, 2024, in *The Wall Street Journal*, Steven Stalinsky posited:

The collaboration between senior terrorists and their growing list of friends in the U.S. and the West has real-world consequences. These groups are designated terrorist for a reason. They don't plan marches and rallies—they carry out terrorist attacks. And when the U.S. and Western activists, including college students, see that their marches and protests aren't achieving their goals, they may consider their next steps—which will be influenced by the company they have been keeping.¹⁸⁸

162. As of late, the House Committee on Oversight and Accountability has launched an investigation into “the funding sources of groups supporting illegal activities across the country, including at institutions of higher education, by individuals spouting pro-Hamas propaganda and engaged in antisemitic harassment and violations of the civil rights of Jewish students.”¹⁸⁹ At the center of this investigation are Defendants NSJP and AMP.

¹⁸⁶ Hon. Jason Smith, *Chairman Smith Opening Statement – Hearing on the Nexus Between Terror Financing, Tax-Exempt Charities, & Antisemitism*, COMMITTEE ON WAYS AND MEANS (Nov. 15, 2023), <https://waysandmeans.house.gov/2023/11/15/chairman-smith-opening-statement-hearing-on-connection-between-terror-financing-tax-exempt-charities-antisemitism/>.

¹⁸⁷ Hon. Jason Smith, *Weekly Capitol Report: Fighting Back Against Antisemitism* (Nov. 24, 2023), <https://jasonsmith.house.gov/newsroom/documentsingle.aspx?DocumentID=5257>.

¹⁸⁸ Steven Stalinsky, *Who's Behind the Anti-Israel Protests*, WALL ST. J. (Apr. 22, 2024), https://www.wsj.com/articles/whos-behind-the-anti-israel-protests-hamas-gaza-hezbollah-talking-points-d2f538ca?st=z6lfo1uohyqbsvk&reflink=article_email_share.

¹⁸⁹ Letter from Rep. James Comer, Chairman, Comm. on Oversight and Accountability, House of Representatives, to Osama Abuirshaid, Executive Director, American Muslims for Palestine, at 1 (May 29, 2024) [henceforth, “**May 29 Letter**”]. See **Exhibit H**.

163. On May 14, 2024, Chairman James Comer and Chairwoman Virginia Foxx requested from U.S. Secretary of the Treasury Janet Yellen “[a]ll Suspicious Activity Reports (SARs) generated in connection to [a series of] organizations, or any known officer or employee” of said organizations.¹⁹⁰ Among those organizations were Defendant NSJP, referred to as “Students for Justice in Palestine (including any individual chapter thereof)”; Defendant AMP; and Defendant WESPAC.¹⁹¹

164. On May 29, 2024, Chairman James Comer contacted Defendant Mr. Abuirshaid directly, explaining, “The Committee is particularly concerned that organizations promulgating pro-Hamas propaganda and engaging in illegal activities at institutions of higher education might be receiving funding or other support from foreign or domestic sources which support the aims of Hamas or other foreign terrorist organizations.”¹⁹²

165. In his letter to Mr. Abuirshaid, Chairman Comer describes Defendant NSJP’s role in fomenting the campus chaos and detail the organization’s pernicious ties to Hamas. In reference to Defendant NSJP, the letter states, “Individuals previously affiliated with Hamas-backed charities are providing the trainings, materials, and financial support to college campus protests.”¹⁹³ The letter details the following:

According to the Anti-Defamation League, AMP is the alter ego of the Islamic Association of Palestine (IAP), dissolved in 2004 after being implicated in terror finance. Once the main propaganda arm for Hamas in the U.S., which was Several of IAP’s employees and officers went on to found AMP as the rebranded material support arm for Hamas. AMP is also linked to the Holy Land Foundation (HLF), which sent approximately \$12.4 million outside the U.S. to support Hamas. Like

¹⁹⁰ Letter from Rep. James Comer, Chairman, Comm. on Oversight and Accountability, House of Representatives, and Rep. Virginia Foxx, Chairwoman, Comm. on Oversight and Accountability, House of Representatives, to Janet Yellen, Secretary, U.S. Dep’t of Treasury, at 1 (May 14, 2024). See **Exhibit I**.

¹⁹¹ *Id.* at 1-2.

¹⁹² May 29 Letter, *supra* note 180, at 1.

¹⁹³ *Id.* at 2.

IAP, HLF was founded by members of Hamas senior leadership and was shut down due to five of its officers being convicted for terror financing. Four former employees of HLF now work for AMP, which frequently sponsors events featuring past leaders of HLF and their families.¹⁹⁴

166. In his letter, Chairman Comer also requests a series of documents and information concerning the funding of Defendant NSJP and the due diligence practices conducted in relation to such funding, as well as any documents and information concerning the October 7 terror attacks, including any materials indicating support of Hamas's actions.¹⁹⁵

167. On June 25, 2024, Chairman Comer indicated that he would subpoena AMP if it did not respond to his document request by July 8, 2024.¹⁹⁶

168. On July 9, 2024, Director of National Intelligence Avril Haines released a statement on recent Iranian influence efforts in the United States. In it, Director Haines notes that, individual protestors "may not be aware that they are interacting with or receiving support from a foreign government," but that

... Iranian government actors have sought to opportunistically take advantage of ongoing protests regarding the war in Gaza, using the playbook we've seen other actors use over the years. We have observed actors tied to Iran's government posing as activists online, seeking to encourage protests, and even providing financial support to protestors.¹⁹⁷

Director Haines's comments suggest that Iran uses AMP, NSJP, and WESPAC—the entities controlling the Unity Intifada in the United States—to pursue Hamas's propaganda and recruiting goals in the United States.

¹⁹⁴ *Id.* at 2-3.

¹⁹⁵ *Id.* at 3.

¹⁹⁶ Letter from Rep. James Comer, Chairman, Comm. on Oversight and Accountability, House of Representatives, to Osama Abuirshaid, Executive Director, American Muslims for Palestine (June 24, 2024).

¹⁹⁷ Avril Haines, *ODNI News Release No. 17-24: Statement from Director of National Intelligence Avril Haines on Recent Iranian Influence Efforts* (July 9, 2024), <https://www.dni.gov/index.php/newsroom/press-releases/press-releases-2024/3842-statement-from-director-of-national-intelligence-avril-haines-on-recent-iranian-influence-efforts>.

169. As evidenced by recent actions at both the state and federal level, it has become increasingly clear that AMP is simply the reincarnation of IAP and is expressly designed to substantially assist Hamas.

170. For decades, AMP has provided Hamas a mouthpiece in the United States just as its prior incarnation, IAP. AMP's ability to do so has dramatically increased since its founding of NSJP, which has allowed it to proliferate Hamas's message across hundreds of college campuses. Meanwhile, WESPAC's financial support keeps the entire operation running. Defendants' propaganda and terroristic efforts are instrumental to Hamas's terrorist activities and ability to remain functional amid Israel's response.

171. These efforts constitute continuous, systematic, and material support for Hamas's October 7 terrorist attack and Hamas's ongoing acts of international terrorism.

K. THIS LAWSUIT SEEKS TO HOLD DEFENDANTS LIABLE FOR SERVING AS A CRITICALLY IMPORTANT BRANCH OF HAMAS IN THE UNITED STATES, NOT TO SUPPRESS CONSTITUTIONALLY PROTECTED SPEECH

172. This case is about organizations whose very creation was intended to provide continuous, systematic, and substantial assistance to an FTO and its allies; those who lead such organizations and produce material for said organizations; and those who knowingly bankroll their illicit activities.

173. The law distinguishes between those who engage in independent advocacy and those who are providing a service to FTOs. Defendants do not just assist Hamas but are part of Hamas's movement—the same movement that attacked Plaintiffs and continues to attack them to this day. There is no doubt that Defendants fall into the latter category.

174. The assistance Defendants provide to Hamas through their propaganda is material, critical, systematic, and of significant monetary value. In fact, Defendants' substantial assistance is invaluable. It would be illegal for Hamas to retain a public relations firm in the United States,

but if it could, these services would be prohibitively expensive. For comparison, the state of Qatar spent \$200 million on one lobbying campaign alone in 2017,¹⁹⁸ including millions to various public relations firms.¹⁹⁹ Here, Defendants provide those services to Hamas and WESPAC foots the bill.

175. It is not just Defendants' propaganda that provides substantial assistance to Hamas; they are similarly responsible for providing Hamas with substantial assistance through their control, management, and instigation of various acts of domestic terrorism, including violent acts for the express benefit of Hamas and its allies.

COUNT I
VIOLATION OF THE ANTI-TERRORISM ACT, 18 U.S.C. § 2333(d)
(Aiding and Abetting Liability)

176. U.S. Plaintiffs repeat and reallege paragraphs 1 through 175.

177. Under the Antiterrorism Act, “[a]ny national of the United States injured in his or her person, property, or business by reason of an act of international terrorism, or his or her estate, survivors, or heirs, may sue therefor in any appropriate district court of the United States and shall recover threefold the damages he or she sustains and the cost of the suit, including attorney’s fees.” 18 U.S.C. § 2333(a).

178. “[L]iability may be asserted as to any person who aids and abets, by knowingly providing substantial assistance, or who conspires with the person who committed such an act of international terrorism.” 18 U.S.C. § 2333(d)(2).

179. A defendant may be liable under the Antiterrorism Act even without a “strict nexus” between the substantial assistance and the act of international terrorism so long as there is “a

¹⁹⁸ Aruna Viswanatha & Julie Bykowicz, *As Qatar Mediates the World’s Disputes, Its U.S. Lobbying Sows Legal Problems*, WALL ST. J. (Jan. 7, 2024), <https://www.wsj.com/world/middle-east/as-qatar-mediates-the-worlds-disputes-its-u-s-lobbying-sows-legal-problems-3a582a9d>.

¹⁹⁹ Ben Flanagan, *Qatar Lobbyists ‘Paid \$4 Million by Mysterious PR Firm’*, ARAB NEWS (updated Jan. 10, 2019), <https://www.arabnews.com/node/1433176/middle-east>.

foreseeable risk” of such act. Indeed, in some cases, a “defendant’s role in an illicit enterprise can be so systemic that the secondary defendant is aiding and abetting every wrongful act committed by that enterprise.” *See Twitter v. Taamneh*, 598 U.S. 471, 495-96 (2023).

180. Hamas is a United States designated FTO that committed, planned, or authorized various acts of international terrorism including its (a) terrorist attack on October 7th; (b) ongoing rocket attacks against non-military, civilian targets; and (c) holding innocent civilians hostage.

181. For decades, AMP and NSJP have provided substantial assistance to Hamas by acting as its propaganda wing in the United States, recruiting domestic foot soldiers for Hamas, and fomenting violence, chaos, and fear in the United States to support Hamas’s short and long-term goals and international terrorist activities.

182. Since at least 2016, WESPAC’s financial support has allowed AMP and NSJP to increase and expand their operations.

183. With funding from WESPAC, AMP and NSJP, along with individual Defendants, intentionally instigate a mass culture of fear, threats, violence, and overt hatred to intimidate politicians and institutions for the benefit of Hamas by organizing, managing, controlling, and intentionally inciting riots and acts of domestic terrorism as part of its substantial assistance to Hamas.

184. AMP and NSJP are successor entities to an original material support enterprise for Hamas. In fact, many senior leaders of the original enterprise control AMP and NSJP today.

185. Defendants knowingly provide substantial assistance to Hamas through their services. Indeed, in the NSJP Toolkit, Defendants confirm not only that they are aware that their propaganda and incitement activities support Hamas but also that they perceive themselves as “PART of” Hamas’s “Unity Intifada”—the terror regime that has damaged U.S. Plaintiffs.

186. WESPAC knowingly provides substantial assistance to Hamas by funding its American propaganda division, particularly NSJP, with the necessary capital to service Hamas. As the fiscal sponsor of NSJP, WESPAC has exercised and continues to exercise control and discretion over the use of NSJP's funds, which it used, and continues to use, to service Hamas.

187. AMP, NSJP, Mr. Abuirshaid, and Mr. Bazian have been providing substantial assistance to Hamas for decades. Indeed, they are simply continuing the same support enterprise originally created by the Muslim Brotherhood in the 1980s.

188. Ms. Baroud currently provides and has been providing media services to AMP since at least 2019. Mr. Herzallah has worked for AMP since 2010 and has been its Director of Outreach and Grassroots Organizing specifically since 2021. WESPAC's substantial assistance to Hamas has been provided since at least 2016.

189. Defendants' support has been so systematic that Defendants aid and abet every wrongful act committed by Hamas and its affiliates.

190. Since October 7, Defendants have aided and abetted Hamas's ongoing rocket attacks and keeping of hostages by engaging in the acts above.

191. Defendants knowingly provide continuous, systematic, and substantial assistance to Hamas and thus aided and abetted Hamas in committing, planning, or authorizing all its acts of international terrorism, including the acts of international terrorism that injured U.S. Plaintiffs.

192. Not only do these acts constitute "substantial assistance" under the civil portion of the Antiterrorism Act, but they also satisfy the Antiterrorism Act's criminalization of providing "material support or resources" to a Foreign Terrorist Organization. *See* 18 U.S.C. §§ 2339A and 2339B.

193. U.S. Plaintiffs have been injured in their persons because of Hamas's acts of international terrorism.

194. By aiding and abetting Hamas in committing, planning, or authorizing acts of international terrorism, including the acts that caused each of the U.S. Plaintiffs to be injured in his or her person and property, Defendants are liable pursuant to 18 U.S.C. § 2333(d) for, threefold any and all, damages that U.S. Plaintiffs have sustained as a result of such injuries, and the costs of this suit, including attorney's fees.

COUNT II
VIOLATION OF THE ALIEN TORT STATUTE, 28 U.S.C. § 1350

195. Israeli Plaintiffs repeat and reallege paragraphs 1 through 175.

196. Pursuant to the Alien Tort Statute (ATS), "The district courts shall have original jurisdiction of any civil action by an alien for a tort only, committed in violation of the law of nations or a treaty of the United States." 28 U.S.C. § 1350.

197. The ATS "specifies that, to state a claim, plaintiffs must (i) be 'aliens,' (ii) claiming damages for a 'tort only,' (iii) resulting from a violation 'of the law of nations' or of 'a treaty of the United States.'" *Flores v. S. Peru Copper Corp.*, 414 F.3d 233, 242 (2d Cir. 2003).

198. Article 2.1(b) of the International Convention for the Suppression of the Financing of Terrorism (ICSFT), adopted by the United Nations General Assembly in 1999, provides:

Any person commits an offence within the meaning of this Convention if that person by any means, directly or indirectly, unlawfully and willfully, provides or collects funds with the intention that they should be used or in the knowledge that they are to be used, in full or in part, in order to carry out:

(a) An act which constitutes an offence within the scope of and as defined in one of the treaties listed in the annex;²⁰⁰ or

(b) Any other act intended to cause death or serious bodily injury to a civilian, or to any other person not taking an active part in the hostilities in a situation of armed conflict, when the purpose of such act, by its nature or context, is to intimidate a population, or to compel a government or an international organization to do or to abstain from doing any act.²⁰¹

199. The ICSFT further recognizes aiding and abetting liability as, *inter alia*, “[c]ontribut[ing] to the commission of one or more offences” stated prior when the assistance is “intentional” and either “made with the aim of furthering the criminal activity or criminal purpose of the group” or “made in the knowledge of the intention of the group to commit an offence.”²⁰²

200. The United States signed the ICSFT on January 10, 2000, and the United States ratified the ICSFT on December 5, 2001.

201. Israeli Plaintiffs are aliens under the ATS. 28 U.S.C. § 1350.

²⁰⁰ The treaties listed in the Annex (collectively, the “Treaties”) include the following: Convention for the Suppression of Unlawful Seizure of Aircraft, Dec. 16, 1970, 22 Stat. 1641, 86 U.N.T.S. 105; Convention for the Suppression of Unlawful Acts against the Safety of Civil Aviation, Sept. 23, 1971, 974 U.N.T.S. 177; Convention on the Prevention and Punishment of Crimes against Internationally Protected Persons, Dec. 14, 1973, 1035 U.N.T.S. 167; International Convention against the Taking of Hostages, Dec. 17, 1979, 1316 U.N.T.S. 205; Convention on the Physical Protection of Nuclear Material, Mar. 3, 1980, 1456 U.N.T.S. 124; Protocol for the Suppression of Unlawful Acts of Violence at Airports Serving International Civil Aviation, Feb. 24, 1988, 1589 U.N.T.S. 474; Convention for the Suppression of Unlawful Acts against the Safety of Maritime Navigation, Mar. 10., 1988, 1678 U.N.T.S. 221; Protocol for the Suppression of Unlawful Acts against the Safety of Fixed Platforms located on the Continental Shelf, Mar. 10, 1988, 1678 U.N.T.S. 304; International Convention for the Suppression of Terrorist Bombings, Dec. 15, 1997, 2149 U.N.T.S. 256.

²⁰¹ See International Convention for the Suppression of the Financing of Terrorism, art. 2.1, Dec. 9, 1999, 16 U.S. 49, 2178 U.N.T.S. 197, available at <https://treaties.un.org/doc/db/terrorism/english-18-11.pdf>.

²⁰² *Id.*, arts. 2.5(c)(i)-(ii).

202. Hamas committed acts and continues to commit tortious acts prohibited by the ICSFT, including “caus[ing] death or serious bodily injury to ... civilian[s],” as well as by the Treaties listed in the Annex, including taking civilians hostage and directing explosives towards civilian and government areas within Israel.

203. Israeli Plaintiffs were injured by Hamas’s October 7 terrorist attack and its ongoing terrorist activities directed at civilians, including Israeli Plaintiffs. Mr. Ein-Gal was forced to flee direct fire from Hamas, while Ms. Almog cannot return home due to Hamas’s targeting of civilian structures. These injuries are a direct result of Hamas committing acts prohibited either directly by the ICSFT or by the Treaties referenced in the Annex of the ICSFT.

204. Defendants provided Hamas with material support despite knowledge of Hamas’s terrorist activity both before, during, and after its October 7 terrorist attack.

205. Defendants are liable under the ICSFT’s aiding and abetting liability provision because Hamas committed acts and continues to commit acts prohibited by the ICSFT and Defendants contributed and continue to contribute to these offenses.

206. Thus, under the ATS, Defendants are liable for all damages that Israeli Plaintiffs have sustained because of Defendants’ tortious actions.

JURY DEMAND

207. Under Fed. R. Civ. P. 38(b), Plaintiffs demand a trial by jury on all claims so triable.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray that this Court:

- (a) For Counts I and II, enter judgment against Defendants and for each Plaintiff for compensatory damages in amounts to be determined at trial;
- (b) For Count I, enter judgment against Defendants and for each U.S. Plaintiff for treble damages pursuant to 18 U.S.C. § 2333(d)(2);

- (c) For Count II, enter judgment against the Defendants and for each Israeli Plaintiff for any and all relief as appropriate, including damages and attorney fees, under 28 U.S.C. § 1350;
- (d) Grant such other and further relief as justice requires.

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Date: July 9, 2024

Respectfully Submitted,

Counsel for Plaintiffs Maya Parizer, Ariel Ein-Gal, Hagar Almog, Adin Gess, Noach Newman, Natalie Sanandaji, Yoni Diller, David Bromberg, and Lior Bar Or

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