

**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.)	Civil No.
)	
AJP EDUCATIONAL FOUNDATION,)	
INC. a/k/a AMERICAN MUSLIMS FOR)	
PALESTINE and NATIONAL STUDENTS)	
FOR JUSTICE IN PALESTINE,)	
)	
Defendants.)	

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 and National Students for Justice in Palestine (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. To promote that goal, Hamas seeks to prevent Israel from normalizing relationships with its Arab neighbors. On October 7, 2023, largely to derail Israel’s normalization talks with Saudi Arabia, Hamas and its affiliates launched a surprise terrorist attack against Israel, murdering over 1,200 civilians in cold blood and taking more than

200 people as hostages. To this day, Hamas continues to hold innocent civilians hostage and launch rockets (more than 6,000 since October 7) at civilian targets.

Hamas employs unconventional weapons to continue its terrorist attacks, including taking hostages, using noncombatants as human shields, and spreading lies, propaganda, and chaos around the world. To that end, within hours of its terror attack, Hamas sent out a global call for its allies to mobilize and propagate Hamas's disinformation campaign and instigate chaos through the West, including the United States. Hamas's propaganda directed at American audiences is instrumental to its strategy.

Defendant AJP Educational Foundation, Inc. a/k/a American Muslims for Palestine (“AMP”) serves as 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 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 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 to serve as foot soldiers for Hamas on campus and beyond.

On October 8, *the day after* Hamas's terrorist attack, AMP and NSJP 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 appear to have been 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,” which they describe as 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.” The plain text of the NSJP Toolkit confirms that AMP and NSJP do not merely assist Hamas’s ongoing terror campaign abroad—they perpetuate it in the United States.

AMP and NSJP enacted the NSJP Toolkit as written and beset their army of college students on American streets and college campuses. Through threats, violence, and vocal support for “globalizing” attacks against Jews and anyone who dares to support them, AMP and NSJP have intentionally instigated a mass culture of fear, threats, violence, and overt hatred to intimidate politicians and institutions for Hamas’s substantial benefit. As of the filing of this Complaint, AMP and NSJP are—among other things—coordinating the occupation of dozens of college campuses across the country to “force” the American government and academia 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. AMP and NSJP are the latter. They are not innocent advocacy groups, but rather the propaganda arm of a terrorist organization operating in plain sight.

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 AMP and NSJP’s intentional, systematic, and substantial assistance to Hamas’s acts of international terrorism. AMP and NSJP 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.

JURISDICTION AND VENUE

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

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

14. Venue is proper in this Court under 18 U.S.C. § 2334(a) because Defendant AMP's principal place of business is in Falls Church, Virginia, within the Eastern District of Virginia.

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).

FACTUAL ALLEGATIONS

A. INTRODUCTION TO HAMAS

15. In 1987, after starting the “First Intifada”—a murderous string of terrorist attacks directed at both innocent civilians and Israeli soldiers alike—the Gaza branch of the International Muslim Brotherhood splintered into a new terrorist group: Hamas.² Hamas rejects Israel and the notion of secular Arab or Palestinian rule. In turn, Hamas advocates, supports, and directly engages in terrorism as part of its aim to—through “jihad”—destroy Israel and, in its place, install an Islamic state under Sharia law “from the [Jordan] River to the [Mediterranean] Sea.”³ 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

16. Hamas uses Gazan 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

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

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/backgrounder/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).

17. Hamas relies on terrorism, propaganda, and falsehoods to demonize Israel and cast itself and its members as victims of a mythical “settler-colonial” oppressor image of Israel and the Jewish people.

18. Today, Hamas is funded in large part and 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

B. THE ORIGINAL MATERIAL SUPPORT ENTERPRISE⁷

19. The Muslim Brotherhood founded the “Palestine Committee” in 1988 as a terrorist funding enterprise for Hamas in the United States.⁸ The Palestine Committee was a small network of organizations controlled by activists with no regard or care for corporate form or legal requirements.

20. One goal of the Palestine Committee’s network of pro-Hamas organizations was to derail normalization between Israel and the Arab world. For example, following the Oslo Accords, Israel’s landmark peace deal with the Palestinian Liberation Organization in 1993, the Palestine

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 v. Am. Muslims for Palestine*, 9 F.4th 545 (7th Cir. 2021).

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>.

Committee held a summit in Philadelphia, Pennsylvania. At the summit, the Palestine Committee strategized how best to disrupt Israel’s peace efforts, provide political force to Hamas and its sympathizers, and assure Hamas that its allies in the United States would assist Hamas on several fronts, including the “financial, information[al], [and] political.”⁹

21. 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.”¹⁰ AMS was originally incorporated as a separate organization, but merged with IAP and operated as one of its many alter egos.¹¹

22. 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**”), a “Specially Designated Global Terrorist.”¹² Mr. Mashal described IAP as one of the “first pillars” of Hamas’s terrorist organization.¹³

⁹ *Boim* FAC, *supra* note 1, at ¶ 38.

¹⁰ MATTHEW LEVITT, *HAMAS: POLITICS, CHARITY, AND TERRORISM IN THE SERVICE OF JIHAD* 151 (2006).

¹¹ *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’”).

¹² 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>.

¹³ *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>.

23. 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.

24. In 2001, the United States Office of Foreign Asset Control designated HLF a “Specially Designated Global Terrorist.”¹⁴ In 2008, HLF and five of its leaders were convicted of providing material support to Hamas. The five leaders were then sentenced to prison.¹⁵

25. 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.¹⁶

26. 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

27. 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,

¹⁴ OFFICE OF FOREIGN ASSET CONTROL, SANCTIONS LIST SEARCH: HOLY LAND FOUNDATION FOR RELIEF AND DEVELOPMENT, <https://sanctionssearch.ofac.treas.gov/Details.aspx?id=7116>.

¹⁵ 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>.

¹⁶ See *Boim v. Holy Land Found. for Relief & Dev.*, 549 F.3d 685, 701 (7th Cir. 2008).

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 arm in the United States.

28. 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.”¹⁷ 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.¹⁸ Many of its staff are similarly “leftovers” from that enterprise.

29. AMP's founding and current chairman is Hatem Bazian (“**Bazian**”). 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**”).¹⁹ Mr. Bazian created SJP in the image of GUPS and MSA. Mr. Bazian frequently collaborated with IAP and fundraised for KindHearts.

¹⁷ 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>.

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 Means, 118 Cong. (2023) [henceforth, “**Schanzer 2023 Congressional Testimony**”], <https://gop-waysandmeans.house.gov/wp-content/uploads/2023/11/Schanzer-Testimony.pdf>; Schanzer 2016 Congressional Testimony, at 8; *see also* Boim FAC, *supra* note 1, at ¶ 78.

¹⁹ Eitan Fischberger, *The Long Mark 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/>.

30. In some ways, AMP, unlike the prior iteration of the material support enterprise, is more careful 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.”²⁰ 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.

31. Simply put, AMP is a reincarnation of IAP and AMS and continues to operate with the same core people and endeavors to achieve the same goal: acting as Hamas’s propaganda division in the United States.

32. As indicated above, there is a difference between independent advocacy and providing substantial assistance to a foreign terrorist organization. “[A] person of ordinary intelligence would understand that independently advocating for a cause is different from providing a service to a group that is advocating for that cause.”²¹ AMP and its various brands fall squarely on the wrong side of that distinction.

i. *AJP: The “Fiscal Sponsor”*

33. Today, though AMP ostensibly operates as its own organization, it uses the corporate status of its fiscal sponsor, AJP Educational Foundation, Inc. (“**AJP**”).²² AMP founded AJP in 2008. AMP and AJP have identical leadership structures and share the same principal place of business in Falls Church, Virginia. AMP’s website advertises that it is funded exclusively by

²⁰ Schanzer 2016 Congressional Testimony, *supra* note 17, at 8.

²¹ *Holder v. Humanitarian Law Project*, 561 U.S. 1, 24 (2010).

²² 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.ampalestine.org/educate/publications/2020-annual-report>.

domestic donations, but, upon information and belief, AMP can do so only because funds first pass through AJP, a U.S.-based non-profit.

34. 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).²³

ii. *NSJP: Controlling Campus Advocacy*

35. 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.²⁴ Though some SJP chapters chose to remain unaffiliated on paper, upon information and belief, they receive aid and materials from NSJP, particularly as it relates to campus messaging.

36. NSJP has no formal corporate structure of its own but operates as AMP’s college campus brand. 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.²⁵

²³ 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>.

²⁴ 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>.

²⁵ *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>.

37. NSJP's official "fiscal sponsor" is Westchester People's Action Committee Fund ("WESPAC"), a New York-based non-profit organization. As a fiscal sponsor, WESPAC receives and administers donations on behalf of groups such as 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 clientele is intentionally opaque to largely shield from public view the flow of funds between and among them.

38. 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.

39. 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 Zionists as people.²⁶ The purpose of this messaging is not only to justify the terrorism of Hamas and its affiliates in Gaza within Western academia and society at large but also to establish an environment where violence against Jews and anyone else associated with Israel could be construed as acceptable, justified, or even heroic.

iii. AMP Provides Systematic and Ongoing Material Support to Hamas

40. 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 sanitizing Hamas's atrocities and normalizing its terrorism.

²⁶ See, e.g., ISGAP 2019, *supra* note 24, at 11.

41. There is no indication Defendants ever ceased providing material support to Hamas and its affiliates—even in the transition period between IAP and AMP—and there is no reason to believe that Defendants have suddenly stopped engaging in the same conduct they have publicly acknowledged. It is within this complex framework of shell institutions that Defendants provide Hamas with necessary substantial and systematic assistance for Hamas’s ongoing terrorist activity.

D. *HAMAS’S TERRORIST ATTACK*

42. 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 were killed, and over 200 more were taken as hostages into Gaza.²⁷ Hamas was joined in its barbarity by several other FTOs, including the Popular Front for the Liberation of Palestine (“**PFLP**”), another FTO. 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.²⁸ Over 6,900 people were injured in the attacks.²⁹

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

²⁷ 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>.

²⁸ 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>.

²⁹ *Id.*

44. October 7 marked the deadliest day for the Jewish people since the Holocaust.

Plaintiffs were among the many victims that suffered, and continued 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.

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

46. 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.”³⁰

E. *HAMAS TERROR-BY-PROPAGANDA STRATEGY*

47. Hamas’s strategy vis-à-vis Israel 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.³¹

Hamas has issued express guidelines detailing how its propagandists should “play their part in strengthening the home front and in properly conveying information worldwide.”³²

48. 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 list of other common lies—misrepresentative death tolls (often conflating combatant and civilian

³⁰ Velina Tchakarova (@vtchakarova), X (formerly Twitter) (Oct. 21, 2023, 7:36 AM), <https://x.com/vtchakarova/status/1715693654197579867>.

³¹ HAMAS, THE COVENANT OF THE ISLAMIC RESISTANCE MOVEMENT (Aug. 18, 1988), https://avalon.law.yale.edu/20th_century/hamas.asp.

³² 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/>.

death tolls) and objectively false accusations that Israel is an “apartheid state” engaged in a genocide campaign against Palestinians.³³

49. 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.”³⁴

50. 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.³⁵

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

³³ 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>.

³⁴ 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/>.

³⁵ 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.³⁶ The second wave was handled on Hamas’s behalf by Hamas’s PR foot soldiers in the West: AMP, NSJP, and their allies.

51. 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*

52. 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, “[I]et us be partners in creating this great victory, *inshallah*.”³⁷ 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.”³⁸

G. *DEFENDANTS ANSWER THE CALL*

53. 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

³⁶ CSW Report.

³⁷ *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>.

³⁸ *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.³⁹

54. The NSJP Toolkit uses the euphemism “the resistance” and similar phrases to refer to Hamas:

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.⁴⁰

55. There is no ambiguity as to what the NSJP Toolkit means when it uses “the resistance” and similar phrases. The acts the NSJP Toolkit attributes here and elsewhere to “the resistance” are acts by Hamas.

56. 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.*”⁴¹ 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

³⁹ The NSJP Toolkit is attached as **Exhibit A**.

⁴⁰ *Id.* at 1.

⁴¹ *Id.*

struggle, general strikes, and popular demonstrations. *All of it is legitimate, and all of it is necessary.* (emphases added)⁴²

57. The NSJP Toolkit thus compels Defendants, 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.

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

the resistance fighters are still launching new attacks into 48 ... 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.*⁴³

59. Immediately after describing the Unity Intifada, NSJP confirmed it was “PART of this movement, not in solidarity with this movement.”⁴⁴ 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.

60. 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.⁴⁵

61. 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

⁴² *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>.

⁴³ *Id.*

⁴⁴ *Id.*

⁴⁵ *Id.* at 3.

Nova Festival.⁴⁶ 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 graphic.

62. The NSJP Toolkit further requests member organizations endorse the “Towfan Al-Aqsa Statement”⁴⁷ 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.⁴⁸ 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.”

63. The “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.⁴⁹ 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 Brigades⁵⁰ and with all the resistance forces, and we merge with them in this battle that will be recorded in history.”

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

64. The NSJP Toolkit is not a rhetorical tool. It is an instruction manual.

⁴⁶ *Id.* at 5.

⁴⁷ The Bears for Palestine statement shares its name with Hamas’s name for its terrorist attack: Towfan Al-Aqsa, which means “Al-Aqsa Flood.”

⁴⁸ The “Towfan Al-Aqsa Statement” is attached as **Exhibit B**.

⁴⁹ The Resistance News Network Telegram Chat is attached as **Exhibit C**.

⁵⁰ The Al-Qassam Brigades are Hamas’s military wing.

65. 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.

66. 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.⁵¹

67. 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.

68. *In short, Defendants act as Hamas’s public relations division and recruit domestic foot soldiers not only to disseminate Hamas’s propaganda but also to foment violence, chaos, and fear across the United States to intimidate citizens and coerce change in American policy. This is all in support Hamas’s short and long-term goals for its international terrorist activities.*⁵²

69. Just as the NSJP Toolkit demanded, Defendants “normalize[d]” Hamas by sanitizing its actions and spreading falsehoods about Israel. For example, Defendants and their

⁵¹ *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>.

⁵² FEDERAL BUREAU OF INVESTIGATION, TERRORISM, <https://www.fbi.gov/investigate/terrorism> (last visited Apr. 29, 2024).

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.

70. 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.”⁵³ 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.

71. Defendants organized “Day of Resistance” riots and protests for many SJP chapters, 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).⁵⁴

72. 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

⁵³ NSJP Toolkit, *supra* note 39, at 4.

⁵⁴ 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’ “Day of Resistance” Protests*, JEWISH J. (Oct. 18, 2023), <https://jewishjournal.com/uncategorized/364002/roundup-of-sjp-chapters-day-of-resistance-protests/>.

masks in violation of the North Carolina anti-mask law.⁵⁵ The coordinators, just as the NSJP Toolkit instructs, sought to normalize Hamas’s terrorist activities and instigated violence against, among others, a Jewish professor.⁵⁶ UNC SJP did exactly what the NSJP Toolkit asked them to do: it committed unlawful violent acts to assist Hamas’s goals—which include terrorizing Jews and normalizing Hamas’s atrocities.

- b. **Harvard University:** On October 18, 2023, members of the Harvard College Palestine Solidarity Committee, a recognized NSJP affiliate, hosted an event at which they physically assaulted and harassed a Jewish student on campus.⁵⁷
- c. **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 library⁵⁸ 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.”⁵⁹

⁵⁵ 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-hamas-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>.

⁵⁶ 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 55. See also Exhibit A at 5.

⁵⁷ 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/>.

⁵⁸ 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/>.

⁵⁹ 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>.

- 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."⁶⁰ 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."⁶¹
- 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, the group, along with Defendant NSJP, posted the judge's statement on their respective Instagram accounts, announcing, "WE REJECT THIS."⁶²
- f. **Columbia University:** On November 10, 2023, Columbia University suspended its chapter of SJP for, among other things, "threatening rhetoric and intimidation."⁶³ 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.
- 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

⁶⁰ 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/>.

⁶¹ 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>.

⁶² 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).

⁶³ 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>.

speaking, while chanting “Intifada, Intifada.”⁶⁴ Police had to escort the Jewish students to safety.⁶⁵

- 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.⁶⁶
- 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.”⁶⁷ The mob then vandalized the windows of the restaurant.⁶⁸ The U.S. Department of Education has since opened an investigation into Temple University based on allegations of antisemitism, 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.”⁶⁹
- 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.”⁷⁰
- k. **University of California at Berkeley:** On February 26, 2024, Bears for Palestine stormed an event where an IDF Reservist was scheduled to deliver

⁶⁴ 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/>.

⁶⁵ 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/>.

⁶⁶ 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>.

⁶⁷ 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>.

⁶⁸ 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>.

⁶⁹ 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>.

⁷⁰ 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/>.

a lecture on international law.⁷¹ Prior to the event, Bears for Palestine had posted on its social media that it would “SHUT IT [the event] DOWN.”⁷² 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.⁷³ The members blocked the venue, smashed the windows, and physically attacked several Jewish students in attendance.⁷⁴ One student reported being choked by rioters.⁷⁵ Police are investigating the batteries as hate crimes.⁷⁶

1. **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 Jewish student holding an Israeli flag was punched in the stomach and spit on by a protester, while his flag was taken from him.⁷⁷

- m. **California State Polytechnic University-Humboldt (“Cal Poly-Humboldt”):** As of April 26, 2024, Cal Poly-Humboldt is “closed” for the remainder of the semester because several buildings on campus are “occupied” by pro-Palestinian protesters.⁷⁸ NSJP has praised the student protests.⁷⁹

⁷¹ 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>.

⁷² Bears for Palestine (@bears for Palestine), INSTAGRAM, https://www.instagram.com/p/C3ytamHJyIg/?img_index=1 (last visited April 29, 2024).

⁷³ See Hernandez, *supra* note 71.

⁷⁴ 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/>.

⁷⁵ *Id.*

⁷⁶ 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>.

⁷⁷ Jack Rutherford & Clement Lee, *Student ‘assaulted’ at protest outside Chabad*, Emory Wheel (Apr. 3, 2024), <https://emorywheel.com/student-assaulted-at-protest-outside-chabad/>.

⁷⁸ California State Polytechnic University-Humboldt, *Emergency: Campus Access, Resources, and Support*, <https://www.humboldt.edu/emergency> (last visited April 28, 2024).

⁷⁹ National SJP (@NationalSJP), X (formerly Twitter) (Apr. 27, 2024), <https://x.com/nationalsjp/status/1784418921585529246?s=61&t=SPDhL2DW4PEZOadUv3LplQ>.

73. 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*

74. 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 hiring an American public relations firm. Defendants fill this critical gap by providing invaluable communication services that Hamas cannot receive or pay for elsewhere in the United States.

75. Defendants do not just parrot Hamas’s talking points. 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 not only hostage taking, but “everything we do, it is justified.”⁸⁰ 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.”⁸¹ 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

⁸⁰ 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).

⁸¹ *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>.

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.⁸²

76. 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.”⁸³ 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 aggression.”⁸⁴ *The next day*, NSJP responded by advertising a “Week of Action for Gaza.”⁸⁵
- b. On November 4, 2023, both AMP and NSJP co-sponsored the National March on Washington: Free Palestine in Washington D.C.⁸⁶ *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.”⁸⁷

⁸² 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>.

⁸³ 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/>.

⁸⁴ *Id.*

⁸⁵ National SJP (@nationalsjp), INSTAGRAM, https://www.instagram.com/p/CzENKGiLKdO/?img_index=1 (last visited Apr. 29, 2024).

⁸⁶ 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).

⁸⁷ 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/>.

That same day, NSJP happily obliged and announced its next event, a Shut it Down for Palestine campaign, scheduled for November 9, 2023.⁸⁸

- 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.⁸⁹
- 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.”⁹⁰ *The next day*, NSJP announced another Shut It Down for Palestine event to be scheduled on November 17, 2023, and released a new toolkit to help their chapters mobilize.⁹¹
- 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.⁹²
- 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,

⁸⁸ The People’s Forum (@peoplesforumnyc) & National SJP (@nationalsjp), INSTAGRAM, https://www.instagram.com/p/CzRnaL9gYCb/?img_index=1 (last visited Apr. 29, 2024).

⁸⁹ National SJP (@nationalsjp), INSTAGRAM, https://www.instagram.com/p/CzKGAE3pezX/?img_index=1; <https://www.instagram.com/p/CzcbFIHMBGq/> (last visited Apr. 30, 2024).

⁹⁰ *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-official-osama-hamdan-calls-people-world-increase-solidarity-gaza-israel-neo-nazi-sadistic-threat-humanity>.

⁹¹ National SJP (@nationalsjp), INSTAGRAM, <https://www.instagram.com/p/CznH6uDNqhl/?igsh=MzRIODBiNWFIZA%3D%3D> (last visited Apr. 29, 2024).

⁹² 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).

solidarity, and support by all possible means, on this day and the coming days.”⁹³ *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.”⁹⁴ *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.”⁹⁵

- 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 global mass movement.”⁹⁶ *Two days later*, Defendant NSJP organized a “Shut it Down! For Palestine” event.⁹⁷
- 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...”⁹⁸ *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.⁹⁹

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

77. 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

⁹³ 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/>.

⁹⁴ National SJP (@nationalsjp), INSTAGRAM, <https://www.instagram.com/p/C0PuWfjuPTv/?igsh=MzRIODBiNWFIZA==> (last visited Apr. 29, 2024).

⁹⁵ National SJP (@nationalsjp), INSTAGRAM, <https://www.instagram.com/p/C0SUic1ufhb/?igsh=MzRIODBiNWFIZA==> (last visited Apr. 29, 2024).

⁹⁶ Mario Nawfal (@MarioNawfal), X (formerly Twitter) (Dec. 8, 2023) <https://twitter.com/MarioNawfal/status/1733044753954906154>.

⁹⁷ National SJP (@nationalsjp), INSTAGRAM, <https://www.instagram.com/p/C0oocwmg22h/?igsh=MzRIODBiNWFIZA==> (last visited May 1, 2024).

⁹⁸ Hamas, *Monday, Dec. 11 global #StrikeForGaza*, INTERNATIONAL ACTION CENTER (Dec. 10, 2023), <https://iacenter.org/2023/12/10/monday-dec-11-global-strikeforgaza/>.

⁹⁹ National SJP (@nationalsjp), INSTAGRAM, <https://www.instagram.com/nationalsjp/p/C0sKjv1O0o-/> (last visited Apr. 29, 2024).

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, 2024.¹⁰⁰

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

79. 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’ “Strike4Gaza” planning and propaganda materials were disseminated before the IRGC’s memorandum was leaked.¹⁰¹

80. 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.

81. 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.

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

¹⁰⁰ 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>.

¹⁰¹ See **Exhibit F**.

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

83. 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.

84. 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.¹⁰² The Encampment began the same day that senior Columbia University administrators were scheduled to speak before the U.S. House of Representatives about the ongoing antisemitism problem on their campus.

85. 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.

86. The Encampment was well-supplied with identical tents, toiletries, food, and professional signage. The Encampment was organized by, among others, “Columbia University

¹⁰² 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 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/>.

Apartheid Divest, Students for Justice in Palestine, and Jewish Voice for Peace,”¹⁰³ to aid and abet Hamas and IRGC through the disruption of major American academic institutions until their demands were met.

87. 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.¹⁰⁴

88. 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.”¹⁰⁵

89. 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

¹⁰³ 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/>.

¹⁰⁴ 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/>.

¹⁰⁵ 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>.

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.¹⁰⁶

90. Recall, 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.

91. 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, “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!”¹⁰⁷

92. The next day, activities at the Encampment continued to escalate.

93. The Encampment—organized, funded, and managed by Defendants—knew its efforts were expressly being taken to support Hamas.

94. 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!”

¹⁰⁶ National SJP (@nationalsjp), Instagram, <https://www.instagram.com/p/C580sAZONce/?igsh=MzRIODBiNWFIZA%3D%3D> (last visited Apr. 29, 2024).

¹⁰⁷ Starr, *supra* note 105.

95. One member of the Encampment identified Jews on Columbia's campus as "Al-Qassam's Next Target."

96. One video from the Encampment shows a mob throwing a bottle at the head of a Jewish student while the mob swarms him and screams: "Zionist!" "Genocidal Maniac!" "You've got blood on your hands!" "Fuck you!" "Genocidal Freaks!" "Bye, bye fuckers!"

97. 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.¹⁰⁸

98. 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 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.

¹⁰⁸ 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.

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

99. Some Jewish students at Columbia recognized the danger they faced and requested the ability to study and attend class remotely.¹⁰⁹

100. 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:

WE ARE ALL SJP! 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 administration to divest, for the people of Gaza! Join the Popular University, take back our institutions!¹¹⁰

101. As of the drafting of this Complaint, Defendants' actions at Columbia continue to escalate. For example, on April 29, 2024, Defendants' mob seized Hamilton Hall, barricading the doors, blocking entrances, smashing windows, and zip-tying the doors shut.¹¹¹

102. Defendants' tactics are designed to bend American institutions and government policy to their will.

103. Just as they said they would, Defendants replicated their efforts that allowed them to provide significant substantial assistance to promote Hamas's aims at Columbia. They have

¹⁰⁹ 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/>.

¹¹⁰ National SJP (@nationalsjp), INSTAGRAM, https://www.instagram.com/p/C5_GEIWuo0D/.

¹¹¹ Aviva Klompas (@AvivaKlompas), X (formerly Twitter) (Apr. 30, 2024), <https://twitter.com/AvivaKlompas/status/1785266759366226128>.

taken their substantial assistance to universities across the country. The list of schools with participating “encampments” grows daily.

H. *HAMAS AND ITS ALLIES PUBLICLY RECOGNIZE DEFENDANTS’ SUBSTANTIAL ASSISTANCE*

104. On October 29, 2023, Hamas applauded and celebrated “the masses who demonstrated in American cities and Western capitals in solidarity with Gaza.”¹¹² Many of those demonstrations were orchestrated and coordinated, in whole or in part, by Defendants. In that same statement, 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.”

105. On January 21, 2024, Mr. Mashal explained how the protests and slogans of the American students in the wake of October 7, have renewed and reinvigorated the goals of Hamas to completely destroy Israel.¹¹³

106. 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 the Israeli-designated terror group (Samidoun), Khaled Barakat (“**Barakat**”), a PFLP terrorist leader,¹¹⁴ and Sean Eren (“**Eren**”), a member of the NSJP steering committee.

¹¹² Mario Nawfal (@MarioNawfal), X (formerly Twitter) (Oct. 29, 2023), <https://twitter.com/MarioNawfal/status/1718690673749103082>.

¹¹³ *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>.

¹¹⁴ Canary Mission, Khaled Barakat, https://canarymission.org/individual/Khaled_Barakat, (last visited Apr. 30, 2024).

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

107. 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.¹¹⁵

108. Both the Islamic Republic of Iran and the PFLP have also issued statements supporting Defendants and student efforts to support their terrorist allies, including Hamas.¹¹⁶

¹¹⁵ *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>.

¹¹⁶ See **Exhibit G**.

I. CONCERN GROWS OVER DEFENDANTS' MATERIAL SUPPORT FOR HAMAS

109. 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., 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."¹¹⁷

110. In his November 15, 2023, opening statement to the House Ways & Means Committee *Hearing on the Nexus Between Terror Financing, Tax-Exempt Charities, & Antisemitism*,¹¹⁸ 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 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.

111. 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

¹¹⁷ VA Investigation, *supra* note 23.

¹¹⁸ 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://gop-waysandmeans.house.gov/chairman-smith-opening-statement-hearing-on-connection-between-terror-financing-tax-exempt-charities-antisemitism/>.

Americans to fund Hamas before it was shut down by the U.S. government back in the early 2000s.¹¹⁹

112. 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.”¹²⁰ 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.

113. 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.¹²¹

114. In short, AMP is simply the reincarnation of IAP and is expressly designed to substantially assist Hamas. 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. Defendants’ propaganda efforts are instrumental to Hamas’s terrorist activities and ability to remain functional amid Israel’s response.

¹¹⁹ Hon. Jason Smith, *Weekly Capitol Report: Fighting Back Against Antisemitism* (Nov. 24, 2023), <https://jasonsmith.house.gov/newsroom/documentsingle.aspx?DocumentID=5257>.

¹²⁰ 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/>.

¹²¹ 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.

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

J. THIS LAWSUIT DOES NOT SEEK TO SUPPRESS SPEECH, BUT TO HOLD DEFENDANTS LIABLE FOR ACTING AS HAMAS'S MINISTRY OF PROPAGANDA IN THE UNITED STATES

116. This case is not about independent political advocacy. It is about organizations whose very creation was intended to provide continuous, systematic, and substantial assistance to a Foreign Terrorist Organization and its allies.

117. 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 see themselves as part of the movement Hamas controls—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.

118. 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. Hamas is unable by law to retain public relations services 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 2017,¹²² including millions to various public relations firms.¹²³

119. 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.

¹²² Aruna Viswanatha and 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>.

¹²³ Ben Flanagan, *Qatar Lobbyists 'Paid \$4 Million by Mysterious PR Firm'*, ARAB NEWS (Jan. 10, 2019), <https://www.arabnews.com/node/1433176/middle-east>.

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

120. U.S. Plaintiffs repeat and reallege paragraphs 1 through 119.

121. 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).

122. “[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).

123. 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 foreseeable risk” of such act. Indeed, in some cases, “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).

124. Hamas is a United States designated Foreign Terrorist Organization 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.

125. For decades, Defendants 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.

126. 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.

127. Indeed, Defendants themselves are successor entities to an original material support enterprise for Hamas. Defendants are operated primarily by many of those who were senior leaders in the original enterprise.

128. Defendants' substantial assistance of Hamas over a period of decades never ceased and has been so systematic that Defendants aid and abet every wrongful act committed by Hamas and its affiliates.

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

130. 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.

131. Defendants knowingly provided substantial assistance to Hamas and thus aided and abetted Hamas in committing, planning, or authorizing acts of international terrorism, including the acts of international terrorism that injured U.S. Plaintiffs.

132. 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.

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

134. 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

135. Israeli Plaintiffs repeat and reallege paragraphs 1 through 119.

136. Israeli Plaintiffs are aliens under the Alien Tort Statute (“ATS”). 28 U.S.C. § 1350.

137. Israeli Plaintiffs were damaged from Hamas's October 7 terrorist attack and its ongoing terrorist activities directed at civilians, including Israeli Plaintiffs.

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

139. Defendants are also liable under aiding and abetting liability under Articles 2.5(a) and Article 2.5(c)(ii) because Hamas committed acts prohibited by the International Convention for the Suppression of the Financing of Terrorism, which recognizes aiding and abetting liability, and Defendants participated in those acts as accomplices (Article 2.5(a)).

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

JURY DEMAND

141. 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) Enter judgment against Defendants and for each Plaintiff for compensatory damages in amounts to be determined at trial;
- (b) Enter judgment against Defendants and for each U.S. Plaintiff for treble damages pursuant to 18 U.S.C. § 2333(d)(2);
- (c) 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) Enter judgment against the Defendants and for each U.S. Plaintiff for any and all relief as appropriate, for negligent infliction of emotional distress; and
- (e) Grant such other and further relief as justice requires.

[THIS SECTION INTENTIONALLY LEFT BLANK]

Date: May 1, 2024

Respectfully Submitted,

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* – *Pro Hac Vice* Application Forthcoming