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

21 YOUNG AMERICA'S
 22 FOUNDATION; BROOKE
 23 BROLL; and MACY ROEPKE,

24 Plaintiffs,

25 v.

26 GENE D. BLOCK, Former
 27 Chancellor, University of
 28 California, Los Angeles, in his
 personal capacity; DARNELL
 HUNT, Interim Chancellor,
 University of California, Los
 Angeles, in his personal and
 official capacities; MICHAEL S.
 LEVINE, Interim Executive Vice

No. 2:24-cv-8507

VERIFIED COMPLAINT

JURY DEMANDED

1 Chancellor and Provost,
2 University of California, Los
3 Angeles, in his personal and
4 official capacities; MICHAEL
5 BECK, Administrative Vice
6 Chancellor, University of
7 California, Los Angeles, in his
8 personal and official capacities;
9 MONROE GORDEN, JR., Vice
10 Chancellor, University of
11 California, Los Angeles, in his
12 personal and official capacities;
13 MIKE COHN, Director, Student
14 Organizations, Leadership &
15 Engagement, University of
16 California, Los Angeles, in his
17 personal and official capacities;
18 JASMINE RUSH, Dean of
19 Students, University of
20 California, Los Angeles, in her
21 personal and official capacities;
22 and RICK BRAZIEL, Assistant
23 Vice Chancellor, University of
24 California, Los Angeles, in his
25 personal and official capacities,
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INTRODUCTION

1. The University of California, Los Angeles (“UCLA”) has chosen sides in a contentious political debate on the state of Israel.

1 Campus orthodoxy—that Israel is an illegitimate “settler, colonialist”
2 project and an unlawful “occupier” of lands belonging to indigenous
3 Palestinians—is reinforced and displayed in hundreds of ways, big and
4 small, from the way UCLA hires faculty, to the seminars it hosts, to the
5 courses it promotes, and—most importantly—to the voices it allows to
6 dominate campus conversations.
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9 2. UCLA’s leaders are certainly entitled to their opinions, no
10 matter how wrongheaded, and they do not necessarily violate the free
11 speech guarantees of the First Amendment merely by expressing anti-
12 Israel views or allowing others to do so in a lawful manner.
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15 3. What they cannot do, however, is apply a double standard to
16 campus speech, depending on which side of the debate the speaker is
17 on.
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20 4. But this is exactly what the Defendants in this matter have
21 done—treating anti-Israel expression with extreme deference (so much
22 so that during the 2023-24 school year, UCLA tolerated months of
23 abusive and even criminal misconduct by anti-Israel activists,
24 purportedly in the name of “free expression”) while throwing up
25 roadblock after roadblock to thwart a modest pro-Israel speaking event
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1 put forward by Plaintiffs, a conservative organization and a small group
2 of students who are willing to take on the campus mob by publicly
3 discussing pro-Israel points of view.
4

5 5. As an example of how extreme the imbalance has become:
6 during a period in April and May 2024, anti-Israel agitators were given
7 such free reign by UCLA that they began to physically exclude Jewish
8 students from parts of campus—all while chanting such things as
9 “death to the Jews,” and “free Palestine from the hand of Jews.” The
10 agitators were not only unchecked by the UCLA Police, but campus
11 security actually facilitated the Jewish-exclusion zones.
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15 6. Based on these events, a court in this district recently found
16 that Jewish UCLA students are likely to succeed on the merits of a
17 claim that UCLA violated their constitutional rights. *Frankel v.*
18 *Regents of Univ. of California*, No. 2:24-CV-04702-MCS-PD, 2024 WL
19 3811250, at *6 (C.D. Cal. Aug. 13, 2024); *id.* at *8 (“Defendants are
20 prohibited from knowingly allowing or facilitating the exclusion of
21 Jewish students from ordinarily available portions of UCLA’s programs,
22 activities, and campus areas . . .”)
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1 7. At the same time UCLA was complicit in the widespread
2 violation of students' rights and in other criminal and abusive conduct
3 by anti-Israel activists, it was doing everything it could to derail
4 Plaintiffs' proposed pro-Israel lecture planned to take place in mid-May
5 2024 under controlled conditions in the Student Union. UCLA
6 repeatedly ignored requests for information, withheld paperwork
7 approvals, prevented Plaintiffs from effectively advertising in advance
8 of the event, and engaged in other bureaucratic delay tactics.
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12 8. When that did not work, UCLA resorted to less subtle forms
13 of censorship. At the very last minute, just before the lecture was
14 scheduled to take place, UCLA pulled a fast one: locking the doors to
15 the event space, and claiming that the talk needed to be moved to an
16 out-of-the way location because of purported security concerns arising
17 from threatened counter-protest activity.
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21 9. But UCLA should have anticipated the possibility of counter-
22 protests for days if not weeks, and cannot possibly claim to have been
23 taken by surprise. In fact, it did anticipate this possibility, as
24 administrators had expressly withheld approval for the event weeks
25 before because of the mob. Indeed, the activists threatening to counter-
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1 protest were the same ones who had recently established an unlawful
2 encampment that UCLA had facilitated. UCLA cannot, of course,
3 reasonably claim that it needed to handicap Plaintiff's pro-Israel event
4 at the last second due to an emerging threat from protestors who *UCLA*
5 *itself had emboldened* by its extreme passivity (not to mention its active
6 complicity) only days before.
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9 10. In reality, UCLA's last minute switch was simply a
10 continuation of what it had already been doing: taking an extremely
11 fastidious approach to one side of the debate (the pro-Israel side) and
12 playing so "hands off" with respect to the other side that the campus
13 was descending into spirals of vandalism and violence.
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17 11. Defendants imposed this double standard because they
18 disagree with Plaintiffs' pro-Israel message. In so doing, they engaged
19 in viewpoint discrimination in violation of the First Amendment to the
20 United States Constitution.
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23 12. Defendants also violated the First Amendment for the
24 independent reason that when they locked the lecture hall doors and
25 tried to move Plaintiffs' event to an out-of-the-way venue, they gave
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1 official government sanction to a potential campus “shout down” mob
2 that set out to prevent Plaintiffs from having their say in public.

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4 13. Even if one could reasonably believe that UCLA officials
5 were neutral on the question of Israel (which, to be clear, they were
6 not), they still violated the First Amendment by taking the easy way
7 out when the mob threatened to cancel Plaintiffs’ speech—choosing **not**
8 to enforce laws against disruptive and potentially violent “shout down”
9 tactics, but instead choosing to silence Plaintiffs, the target of the mob’s
10 threats.
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14 14. Compounding these constitutional violations, UCLA’s
15 actions were taken pursuant to policies that give the university
16 unbridled discretion to determine a number of factors crucial to the
17 success or failure of a speaking event, such as the number participants
18 allowed to attend, the location of the speech, its timing, and pre-event
19 publicity. Because those policies fail to meaningfully guide UCLA
20 administrators’ decisions, they are facially overbroad and
21 unconstitutional.
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1 15. Plaintiffs seek to hold Defendants accountable for thwarting
2 the May 2024 lecture, a plain violation of well-established First
3 Amendment law.
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5 16. But this lawsuit is about more than the May 2024 lecture.
6 Plaintiffs have a continuing right to speak on campus generally and to
7 present the mainstream perspective on the Middle East conflict in
8 particular. To that end, as the new academic year begins, Plaintiffs
9 intend to host a series of on-campus speakers and activism projects that
10 will present pro-Israel and conservative viewpoints. Plaintiffs' first
11 planned activity will be an on-campus appearance on October 21, 2024
12 by noted Daily Wire commentator Ben Shapiro, who is a popular
13 conservative podcaster and media personality.
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18 17. Plaintiffs have been seeking to engage UCLA in the
19 planning process since early August. However, just as it did with
20 respect to the May 2024 speaking event, UCLA has repeatedly thrown
21 up roadblocks and delays, and has refused to approve the event or
22 commit to providing adequate security. Time is running short and the
23 window during which Plaintiffs can adequately publicize the event is
24 rapidly closing. And, given the probability that anti-Israel and left-
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1 wing activists will threaten to counter-protest, there is an imminent
2 probability that, absent relief from this Court, even if UCLA approves
3 the event now, it will change its mind at the last minute and shut it
4 down, just like it did in May 2024.
5

6 18. Accordingly, Plaintiffs seek injunctive relief to prohibit
7 Defendants from violating the First Amendment. A court in this
8 district recently ordered UCLA to protect Jewish students from
9 religious discrimination by activists, *Frankel*, 2024 WL 3811250; it is
10 high time that UCLA also protects pro-Israel and pro-Jewish voices
11 from the cancel culture mob.
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15 PARTIES

16 19. Plaintiff Young America's Foundation ("YAF") is a nonprofit
17 corporation whose mission is to educate the public on the ideas of
18 individual freedom, free enterprise, a strong national defense, and
19 traditional values.
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22 20. YAF runs a number of educational and public service
23 programs including a Campus Lectures and Activism program that
24 brings conservative and liberty-minded points of view to American
25 colleges and high schools and the Young Americans for Freedom project,
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1 which sponsors students and student groups on campus. One of those
2 student groups is YAF at UCLA, a registered student organization.

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4 21. Plaintiff Brooke Broll is enrolled as an undergraduate in the
5 UCLA Department of Education and Social Transformation. She holds
6 generally conservative and pro-Israel political views, which she believes
7 are vastly underrepresented on campus. Ms. Broll seeks to engage in
8 free speech activities promoting similar views, including by hosting
9 campus speakers. Ms. Broll also desires to hear the views of
10 conservative and pro-Israel speakers and to participate in a public
11 dialog on campus that takes those views seriously. Ms. Broll hopes that
12 students holding left-wing and anti-Israel views will listen to and
13 engage in good faith with the speakers she intends to bring to campus.
14 Ms. Broll is a YAF at UCLA member and was its Vice Chairman during
15 the 2023-24 school year.

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21 22. Plaintiff Macy Roepke is also enrolled at UCLA as an
22 undergraduate in the Department of Education and Social
23 Transformation. She holds generally conservative and pro-Israel
24 political views, which she believes are vastly underrepresented on
25 campus. Ms. Roepke seeks to engage in free speech activities promoting
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1 similar views, including by hosting campus speakers. Ms. Roepke also
2 desires to hear the views of conservative and pro-Israel speakers and to
3 participate in a public dialog on campus that takes those views
4 seriously. Ms. Roepke is a YAF at UCLA member.
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7 23. Defendant Gene D. Block was the Chancellor of UCLA from
8 August 2007 to approximately August 1, 2024. In that role, Defendant
9 Block was responsible for adopting policies and procedures, and
10 overseeing university operations, for all aspects of university life,
11 including security, campus events, and free speech policies and
12 activities. Defendant Block's acts and decisions were the acts and
13 decisions of UCLA. As detailed further below, Defendant Block made
14 decisions to accommodate and encourage extensive (and often unlawful)
15 anti-Israel activism on the UCLA campus, while applying far more
16 restrictive standards to conservative and pro-Israel expression. He is
17 sued in his personal capacity.
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23 24. Defendant Darnell Hunt was the Executive Vice Chancellor
24 and Provost of UCLA from September 2022 to approximately August 1,
25 2024. On August 1, 2024, Defendant Hunt became the Interim
26 Chancellor of UCLA. In his former capacity of Executive Vice
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1 Chancellor, he was responsible for advising the Chancellor and for
2 overseeing campus operations. On information and belief, Defendant
3 Hunt participated in the decisions undertaken by Defendant Block and
4 the other Defendants in this matter. In his current capacity, he is
5 responsible for adopting policies and procedures, and overseeing
6 university operations, for all aspects of university life, including
7 security, campus events, and free speech policies and activities. He is
8 sued both in his personal capacity and in his official capacity.

12 25. Defendant Michael S. Levine is the Interim Executive Vice
13 Chancellor and Provost of UCLA. In that capacity, Defendant Levine
14 advises the Chancellor, oversees campus operations, and develops and
15 implements campus policies and practices for all aspects of university
16 life, including security, campus events, and free speech policies.
17 Defendant Levine was personally instrumental in UCLA's adoption
18 around September 4, 2024 of new campus rules that effectively cap the
19 number of conservative and pro-Israel organized events that can take
20 place on campus while allowing an unlimited number of left-wing and
21 anti-Israel events. *See infra* ¶¶ 146-53. Defendant Levine is sued both
22 in his personal capacity and in his official capacity.

1 26. Defendant Michael J. Beck is the Administrative Vice
2 Chancellor of UCLA and has served in that position since March 2016.
3 Defendant Beck was in charge of the public safety operations of the
4 school at all relevant times through May 5, 2024. Defendant Beck is
5 sued in both his personal capacity and in his official capacity.
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8 27. Defendant Monroe Gorden, Jr., is the Vice Chancellor,
9 Student Affairs, of UCLA and has served in that position since April
10 2018. In that capacity, Defendant Gorden has responsibility for student-
11 facing policies and procedures, including setting and enforcing rules
12 governing speech and speech-related conduct, campus demonstrations,
13 student organizations, and campus speaking events. Gorden is sued
14 both in his personal capacity and in his official capacity.
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18 28. Defendant Mick DeLuca is the Associate Vice Chancellor of
19 Campus Life, UCLA and has served in that position since 2014.
20 Defendant DeLuca has administrative oversight of the Student
21 Organizations, Leadership, and Engagement office (“SOLE”), the office
22 with initial responsibility governing student-group events on campus.
23 Defendant DeLuca reports to Defendant Gorden. Defendant DeLuca is
24 sued both in his personal capacity and in his official capacity.
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1 29. Defendant Mike Cohn is the Director of SOLE. Defendant
2 Cohn participated in all decisions governing the May 15, 2024 campus
3 event planned by Plaintiffs. Defendant Cohn is sued in both his
4 personal capacity and his official capacity.
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6 30. Defendant Jasmine Rush is the UCLA Dean of Students. In
7 that capacity she is responsible for enforcing the student code of
8 conduct, among other things. Defendant Rush is sued in both her
9 personal and official capacities.
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11 31. Defendant Rick Braziel is the Associate Vice Chancellor for
12 Campus Safety at UCLA. In this role, Defendant Braziel serves as the
13 head of the newly created Office of Campus Safety at UCLA, which as of
14 May 5, 2024, oversees the UCLA Police Department (“UCLAPD”).
15 Defendant Braziel is sued in his personal capacity and his official
16 capacity.
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18 32. All individual Defendants are persons acting under color of
19 state law within the meaning of 42 U.S.C. § 1983.
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21 33. Each Defendant is personally responsible for the
22 constitutional violations alleged.
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JURISDICTION AND VENUE

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2 34. Plaintiffs bring this action pursuant to 42 U.S.C. §§ 1983 &
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4 1988 for deprivations of their rights secured by the First and
5 Fourteenth Amendments to the United States Constitution.

6 35. This Court has jurisdiction over this complaint under 28
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8 U.S.C. § 1343, which provides for original jurisdiction for suits brought
9
10 pursuant to 42 U.S.C. §§ 1983 & 1988. The Court also has jurisdiction
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12 under 28 U.S.C. § 1331, because this matter arises under the
13 Constitution and laws of the United States.

14 36. Venue is appropriate in this district under 28 U.S.C. §
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16 1391(b)(2), because a substantial part of the events or omissions giving
17
18 rise to Plaintiff’s claims occurred in this district.

STATEMENT OF FACTS

***UCLA’s Extreme Deference to and Active Complicity in
Anti-Israel Expression***

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22 37. UCLA has a long history of accommodating and even
23
24 encouraging anti-Israel expression on campus.

25 38. Indeed, in a report based on surveys of Jewish
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27 undergraduate students at 50 United States college campuses taken in
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1 2016, UCLA ranked near the top (6th place) on the list for expressions
2 of hostility to the state of Israel.¹

3
4 39. By no means were the anti-Israel sentiments expressed
5 solely by fellow students. At UCLA, approximately a quarter of survey
6 respondents specifically noted being subjected to anti-Israel views from
7 faculty, staff, or administrators.² And a whopping fifty percent of
8 Jewish UCLA students expressed discomfort about stating their
9 opinions on the Israel-Palestinian conflict on campus due to the anti-
10 Israel environment.³

17 ¹ Leonard Saxe, *et al.*, *Hotspots of Antisemitism and Anti-Israel*
18 *Sentiment on US Campuses*, BRANDEIS U., STEINHARDT SOCIAL
19 RESEARCH INST. (Oct. 2016),
20 <https://scholarworks.brandeis.edu/esploro/outputs/9924088244301921/filesAndLinks?index=0>, at 8 Fig. 1 (noting that approximately 60% of
21 survey respondents perceived a hostile campus environment with
22 respect to Israel, in contrast with lower ranked schools such as Tulane,
23 Syracuse and the University of Miami where fewer than 10% of
24 respondents felt similar hostility); *see also id.* at 43-46 (singling out
25 UCLA as one of a handful of “hotspots” for anti-Israel and antisemitic
26 activism),

26 ² *Id.* at 9, Fig. 2

27 ³ *Id.* at 12, Fig. 4 (UCLA respondents’ levels of discomfort second only to
28 CUNY-Brooklyn).

1 40. The same survey ranked UCLA as the worst campus for
2 perceptions of a hostile environment toward Jews generally.⁴

3 41. These perceptions did not come out of thin air. UCLA has
4 bent over backwards to accommodate campus lectures and other
5 activities by virulently anti-Israel and antisemitic advocates for years.
6

7 42. To take just a few examples, in 2014, UCLA approved a talk
8 by Omar Barghouti, co-founder of the Boycott, Divestment and
9 Sanctions (BDS) movement against Jewish and Israeli institutions.⁵
10 The talk was sponsored by UCLA student group Students for Justice in
11 Palestine (“SJP”) and was subtitled “Towards a Global Intifada.”⁶ It
12 featured false claims such as that “Israeli soldiers shoot Palestinian
13 children ‘for sport,’ [that] they ‘provoke’ the children, ‘entice them like
14 mice, and then shoot them’ for no reason [o]ften, . . . just because the
15 soldiers are ‘bored.’”⁷
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22 ⁴ *Id.* at 16, Fig. 6

23 ⁵ Roberta P. Seid, *Omar Barghouti at UCLA: A speaker who brings hate*,
24 JEWISH JOURNAL (Jan. 16, 2014),
25 <https://jewishjournal.com/commentary/opinion/126186/>.

26 ⁶ *Id.*

27 ⁷ *Id.*

1 43. Barghouti’s call to divest from and to boycott Jewish and
2 Israeli institutions was later taken up by the Undergraduate Student
3 Association Council (“USAC”), UCLA’s official undergraduate student
4 group. In response, Southern California Congressman Brad Sherman
5 released a statement saying that “I am embarrassed and disappointed
6 that the . . . Student Associations at my alma mater UCLA passed
7 resolutions to Boycott, Divest and Sanction Israel. The BDS movement
8 calls for the destruction of Israel and the boycott of anyone of Israeli
9 nationality – making it inherently discriminatory and antisemitic. I
10 fear these actions have made it even more difficult for Jewish students
11 to have a safe campus environment.”⁸

12 44. In 2018, SJP hosted a national anti-Israel conference on
13 UCLA’s campus. While Defendant Block stated during the lead up to
14 the conference that “[m]uch of what will be said . . . may be deeply
15 objectionable — even personally hurtful — to those who believe that a
16 complex conflict is being reduced to a one-sided caricature, or see a

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⁸ Brad Sherman, *Sherman Statement on USAC passing resolution endorsing Boycott, Divest and Sanctions movement* (Feb. 26, 2024), <https://sherman.house.gov/media-center/press-releases/sherman-statement-on-usac-passing-resolution-endorsing-boycott-divest>.

1 double standard that demonizes the world’s only Jewish state while
2 other countries receive less condemnation for dreadful behavior,” he
3 allowed the conference to continue, citing the free speech rights of SJP.⁹
4

5 45. While the impulse against censoring the SJP conference, in
6 the abstract, aligns with First Amendment values, it would represent a
7 true commitment to free speech only if matched by similar deference to
8 the pro-Israel side of the debate—which, sadly, does not exist.
9
10

11 46. In 2019, undergraduate UCLA anthropology students were
12 required to attend a guest lecture by Rabab Abdulhadi, an activist who
13 pushed the view that advocating for the validity of a Jewish state in the
14 Middle East was equivalent to “white supremacy.”¹⁰ The lecture led to
15 charges of antisemitism against UCLA. UCLA officials, including
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21 ⁹ Gene D. Block, *Chancellor Block: Why the controversial Students for*
22 *Justice in Palestine conference will go on at UCLA* (Nov. 13, 2018),
23 [https://newsroom.ucla.edu/stories/chancellor-block-why-the-](https://newsroom.ucla.edu/stories/chancellor-block-why-the-controversial-students-for-justice-in-palestine-conference-will-go-on-at-ucla)
24 [controversial-students-for-justice-in-palestine-conference-will-go-on-at-](https://newsroom.ucla.edu/stories/chancellor-block-why-the-controversial-students-for-justice-in-palestine-conference-will-go-on-at-ucla)
25 [ucla](https://newsroom.ucla.edu/stories/chancellor-block-why-the-controversial-students-for-justice-in-palestine-conference-will-go-on-at-ucla).

26 ¹⁰ Aaron Bandler, *UCLA Guest Lecturer Calls Zionists White*
27 *Supremacists*, JEWISH JOURNAL (May 21, 2019),
28 [https://jewishjournal.com/los_angeles/298850/ucla-guest-lecturer-calls-](https://jewishjournal.com/los_angeles/298850/ucla-guest-lecturer-calls-zionists-whitesupremacists/)
[zionists-whitesupremacists/](https://jewishjournal.com/los_angeles/298850/ucla-guest-lecturer-calls-zionists-whitesupremacists/).

1 Defendants, do not appear to have taken any action related to this
2 incident.

3
4 47. In 2022, UCLA refused an application by a medical school
5 student to establish a Students Against Anti-Semitism club,
6 notwithstanding that the university had approved many identity-group
7 organizations, several with explicitly anti-Israel and antisemitic
8 views.¹¹

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11 48. UCLA's course catalog, too, shows that anti-Israel messaging
12 is part of the official curriculum of the university. For example, courses
13 are offered in "Colonization and Nationalism: Jewish Settlement in
14 Palestine-Israel, 1882 to 1948" including discussion of "Zionist
15 settlement policy and practice . . . colonialism, socialism, and national
16 conflict over Palestine."¹² Among other things, this course reflects the
17 highly-contested (to say the least) point of view that the settlement of
18 Jews in Israel is a type of "colonialism," rather than what it really was:
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24 ¹¹ *UCLA Delegation Visits Israel as Antisemitism Rises*, I24 NEWS,
25 https://www.youtube.com/watch?v=ezmkpTlf_Mw at timestamp 3:48 to
26 4:30 (last visited Sept. 6, 2024).

27 ¹² UCLA Catalog 2023-2024 at 702,
28 <https://registrar.ucla.edu/file/2b7e14c9-ea73-4c99-abdf-3e618e32e403>.

1 the establishment of a modern state by a people who had been
2 indigenous to the region for approximately 3,000 years.

3
4 49. None of this is to say that UCLA should not allow anti-Israel
5 speech on campus when lawfully expressed without violence or other
6 illegal conduct. But when apparently benign tolerance for one side of a
7 contentious debate is not matched by a similar tolerance for the other
8 side, claimed fealty to the principles of “free expression” become
9 implausible.
10
11

12 ***As Anti-Israel Activism Became Increasingly Violent after the***
13 ***October 7, 2023 Hamas Attack, UCLA’s Tolerance Evolved into***
14 ***Complicity***

15 50. At UCLA, expression of anti-Israel and antisemitic
16 viewpoints became much more aggressive following the October 7, 2023
17 attack in southern Israel by Hamas terrorists that included murders,
18 mutilations, rapes, and kidnappings of hundreds of innocent civilians.
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21 51. In many cases, anti-Israel activism after October 7 has gone
22 beyond merely offensive and intimidating speech, and has veered into
23 criminal activity including outright threats, assaults, and vandalism.
24

25 52. But UCLA’s deference to the anti-Israel point of view is so
26 deeply entrenched, that for months it did nothing in the face of these
27
28

1 escalating threats and violent episodes, all purportedly in the name of
2 the “free speech” rights of the anti-Israel activists.

3
4 53. Almost immediately after the October 7, 2023 rampage,
5 activists on campus began to shower praise on Hamas and to ask for
6 more of the same. Among other celebratory exclamations, On October
7 9, 2023, the UCLA Cultural Affairs Commission stated that
8 “decolonization is not a metaphor” and “we honor th[ose] on the front
9 lines,” in reference to Hamas terrorists who had just slaughtered
10 hundreds of innocent Israeli civilians, including children.¹³

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14 54. For another example, at an October 12, 2023 anti-Israel
15 demonstration at Bruin Plaza, activists chanted in Arabic, “Itbah El
16 Yahud,” which translates to “slaughter the Jews.”¹⁴ Identifiably Jewish
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22 ¹³ Alicia Verdugo, UCLA Cultural Affairs Comm’ner (@culturalaffairs),
23 *The Cultural Affairs Commission of UCLA stands in solidarity with*
24 *Palestinians in their struggle for liberation from Israel*, Slide 2,
25 INSTAGRAM (Oct 9, 2023),
https://www.instagram.com/p/CyMSRCuSlAR/?img_index=1.

26 ¹⁴ Anna Abramzon, *Outnumbered at UCLA’s Pro Hamas Rally*, THE
27 TIMES OF ISRAEL (Oct. 17, 2023),
28 <https://blogs.timesofisrael.com/outnumbered-at-uclas-pro-hamas-rally/>.

1 and/or Israeli individuals were present, and could not help but have felt
2 threatened and intimidated by the activists.

3
4 55. Jewish UCLA faculty were targeted for abuse, including
5 being called “Loudmouth Jew[s].”¹⁵ And SJP and other anti-Israel
6 activists swarmed parts of campus chanting such things as “death to
7 Israel,” “death to Jews,” and “beat that fucking Jew,” the later while
8 bashing a pinata bearing an image of Israeli Prime Minister Benjamin
9 Netanyahu.¹⁶
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12 56. Defendants were aware of these incidents, yet did nothing
13 about them. Indeed, Defendant Block issued a statement purporting to
14 condemn these, and other “reprehensible acts of Antisemitism,” but also
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22 ¹⁵ Inna Faliks, *UCLA Response to Antisemitism Hits a Sour Note*,
23 JEWISH JOURNAL (Nov. 22, 2023),
24 <https://jewishjournal.com/commentary/opinion/365490/ucla-response-to-antisemitism-hits-a-sour-note/>.

25 ¹⁶ Yaron Steinbuch, *UCLA students batter Bibi piñata to chants of ‘Beat*
26 *that f–king Jew!’*, NEW YORK POST (Nov. 10, 2023),
27 <https://nypost.com/2023/11/10/news/ucla-students-batter-bibi-pinata-to-chants-of-beat-that-f-g-jew/>.
28

1 (again) showing deference to the activists on the basis that their activity
2 was allegedly “protected speech under the First Amendment.”¹⁷

3
4 57. UCLA’s strong(ish) words, but lack of concrete action led,
5 predictably, not to a cooling off of campus tensions, but to increasingly
6 violent and threatening conduct by anti-Israel agitators.
7

8 58. For example, on November 28, 2023, masked anti-Israel
9 activists were photographed on campus using large knives to “stab” and
10 remove posters of Israeli hostages.¹⁸ Defendant Block was aware of this
11 incident, and its obvious implicit threat, but did nothing in response.
12

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14 59. Swastikas, pigs holding bags of money, and other antisemitic
15 imagery and tropes showed up all around the UCLA campus throughout
16 the fall, winter and spring of the 2023-24 school year.
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22 ¹⁷ Gene D. Block, et al., *Standing Against Bigotry at the University of*
23 *California* (Nov. 10, 2023),
24 [https://chancellor.ucla.edu/messages/standing-against-bigotry-at-the-](https://chancellor.ucla.edu/messages/standing-against-bigotry-at-the-university-of-california/)
25 [university-of-california/](https://chancellor.ucla.edu/messages/standing-against-bigotry-at-the-university-of-california/).

26 ¹⁸ Jenel Treza, *UCLA students seen brandishing knives on campus*
27 *destroying posters of kidnapped Israelis*, OPOYI (Nov. 28, 2023),
28 [https://opoyi.com/usa/ucla-students-seen-brandishing-knives-on-](https://opoyi.com/usa/ucla-students-seen-brandishing-knives-on-campus-destroying-posters-of-kidnapped-israelis-see-photo/)
[campus-destroying-posters-of-kidnapped-israelis-see-photo/](https://opoyi.com/usa/ucla-students-seen-brandishing-knives-on-campus-destroying-posters-of-kidnapped-israelis-see-photo/).

1 60. In March 2024, during a required course, UCLA medical
2 school students were forced to attend a class led by a UCLA “activist in
3 residence,” who has called October 7 “justice.”¹⁹ The “activist in
4 residence”—who is part of a program to “turn the university inside out”
5 through university-funded left wing activism²⁰—led students in pro-
6 Hamas chants such as “free Palestine!” Defendants, of course, had
7 facilitated the “activist in residence” program and the conduct of its
8 grantees.
9
10

11
12 61. But the worst anti-Israel and antisemitic conduct would not
13 come until late April 2024, when an “encampment” was established on
14 Royce Quad, a central location on the UCLA campus which, in normal
15 times, is used daily by a large portion of the student community.
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22 ¹⁹ Aaron Sibarium, *UCLA Med School Requires Students to Attend*
23 *lecture Where Speaker Demands Prayer for ‘Mama Earth,’ Leads Chants*
24 *of ‘Free Palestine’*, WASHINGTON FREE BEACON (Apr. 4, 2024),
25 <https://freebeacon.com/campus/ucla-med-school-requires-students-to-attend-lecture-where-speaker-demands-prayer-for-mama-earth-leads-chants-of-free-palestine/>.
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27 ²⁰ <https://challengeinequality.luskin.ucla.edu/activist-in-residence/> (last
28 visited Sept. 18, 2024).

1 62. On April 25, 2024, a group of anti-Israel activists set up
2 tents, signs, tables and other semi-permanent structures in Royce
3 Quad. *Frankel*, 2024 WL 3811250, at *2. The activists created their
4 own chains of authority, limiting who could enter or pass through the
5 so-called “encampment,” which was in reality an arbitrarily delimited
6 piece of university real estate that should have been accessible to any
7 student or campus guest, without regard to activists’ preferences. *Id.*

8 63. The activists set up checkpoints around the perimeter of
9 their encampment and required anyone wishing to cross to wear a
10 wristband, given only to individuals who called for the elimination of
11 Israel. *Id.* In addition to preventing anyone who disagreed with them
12 from accessing Royce Quad, the Powell Library, and other campus
13 facilities (which were accessible only through the encampment), as a
14 court in this district recently held, the activists specifically excluded
15 Jewish students and faculty who “refused to denounce their faith.” *Id.*
16 at *1.

17 64. Defendants were, of course, well aware of these events.
18 Indeed, in preliminary injunction proceedings in a separate lawsuit
19 pending in this district, UCLA did not dispute that any of this
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1 misconduct took place. *Id.* at *1-2. In that lawsuit, UCLA “[i]nstead . . .
2 . claim[ed] that it ha[d] no responsibility to protect the religious freedom
3 of its Jewish students because the exclusion was engineered by third-
4 party protestors.” *Id.* at *1.

65. As the days dragged on to over a week, encampment
6 activists also engaged in increasing acts of violence and intimidation.
7
8 Among other things, on April 25, 2024, activists attacked and knocked
9 unconscious a pro-Israel student.²¹ On April 26, 2024, a Jewish
10 professor at the UCLA medical school, Nir Hoftman, was assaulted by
11 anti-Israel activists while he was walking to give an interview to a news
12 station, according to reports.²²
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20 ²¹ Tzvi Joffre, *Anti-Israel protesters at UCLA attack Native American*
21 *woman opposing Hamas*, THE JERUSALEM POST (April 28, 2024),
22 <https://www.jpost.com/diaspora/antisemitism/article-798915>; *see also*
23 [https://stopantisemitism.org/04/28/jewish-native-american-student-](https://stopantisemitism.org/04/28/jewish-native-american-student-assaulted-on-california-college-campus-by-pro-hamas-mob/)
[assaulted-on-california-college-campus-by-pro-hamas-mob/](https://stopantisemitism.org/04/28/jewish-native-american-student-assaulted-on-california-college-campus-by-pro-hamas-mob/).

24 ²² *UCLA Professor Nir Hoftman: This is total lawlessness and anarchy*,
25 FOX NEWS (Apr. 29, 2024),
26 [https://www.foxnews.com/video/6352003273112?msocid=](https://www.foxnews.com/video/6352003273112?msocid=210a9cb8be0d686f077f8fe9ba0d665d)
[210a9cb8be0d686f077f8fe9ba0d665d](https://www.foxnews.com/video/6352003273112?msocid=210a9cb8be0d686f077f8fe9ba0d665d); Jennifer Kabbany, *UCLA becomes*
27 *hotbed of anti-Israel hate*, THE COLLEGE FIX (Apr. 30, 2024),
28 <https://www.thecollegefix.com/ucla-becomes-hotbed-of-anti-israel-hate/>

1 66. On April 28, 2024, masked anti-Israel activists left the
2 encampment to surround, push and shove Jewish and pro-Israel
3 bystanders. The activists pepper-sprayed Jewish and pro-Israel
4 students, and knocked at least one to the ground, requiring
5 hospitalization.²³
6

7
8 67. During this period activists also regularly menaced Jewish
9 and pro-Israel students with symbols such as inverted red triangles
10 used by Hamas to indicate targets for terrorist attacks.
11

12 68. The activists' conduct plainly violated a number of campus
13 rules then in effect, including:
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- 15
16 • UCLA Regulations on Activities, Registered Organizations,
17 and Use of Properties (Sept. 25, 2017), attached as Exhibit A
18 at ¶¶ IV(A)(2) (prohibiting such things as “block[ing]
19 entrances to or otherwise interfer[ing] with the free flow of
20 traffic into and out of campus buildings,” “produc[ing]
21 amplified or non-amplified sound that disrupts campus
22 activities,” and “engag[ing] in physically abusive,
23 threatening, or intimidating conduct”); IV(B)(1), IV(B)(6)
24 (“No person, while in or upon any [UCLA] property may
25 wear a mask, personal disguise or otherwise conceal one’s
26 identity with the intent of intimidating any person or group .
27 . . .”), IV(B)(7), IV(B)(8), IV(D)(12), IV(F)(3), App’x 4
28

²³ Frankel Dec. ¶¶ 39-43.

1 §§ 100004-100007 (defining criminal misdemeanor offenses
2 for non-students/faculty/staff);²⁴

- 3 • UCLA Procedure 850.1 (Placement of Temporary Structures
4 on the UCLA Campus);
- 5 • UCLA Policy 860 (May 8, 2000) (Extracurricular Use of
6 University Facilities), *superseded by* UCLA Interim Policy
7 860 (Sept. 4, 2024).
- 8 • UCLA Student Affairs Pub. “Your First Amendment Rights
9 as a Student at UCLA”²⁵ at 3 (protest activities must “not
10 interfere with the orderly operation of the campus and must
11 be conducted in a manner that reasonably protects others
12 from becoming involuntary audiences.”)
- 13 • *Id.* at 7-8 (students prohibited from “interfere[ing] with the
14 free flow of traffic into and out of campus buildings.”)
- 15 • *Id.* (students prohibited from “intimidating, harassing, or
16 obstructing any University employee, student, or any other
17 person having lawful business with the University.”)
- 18 • *Id.* (students prohibited from “camp[ing]” without
19 authorization)

20 69. The activists also likely violated a number of state laws,
21 including criminal laws. For example:
22

23 ²⁴ These regulations were in effect at the time of the encampment. They
24 have since been superseded by UCLA Interim Regulations 850, 860 &
25 862 (Sept. 4, 2024).

26 ²⁵ Available at [https://deanofstudents.ucla.edu/file/b06df921-414c-
27 4bed-bf48-b3889f4aea8b](https://deanofstudents.ucla.edu/file/b06df921-414c-4bed-bf48-b3889f4aea8b) (last visited Sept. 18, 2024); *see also* UCLA
28 Interim Policy 862 (Sept. 4, 2024).

- 1 • Cal. Penal Code Tit. 8 Ch. 9 §§ 240-248 (defining assault and
2 battery offenses)
- 3 • *Cf.* Cal. Penal Code §§ 626.4 & 626.6 (empowering university
4 officials to notify persons such as the encampment activists
5 who interfere with the orderly and peaceful operations of the
6 campus to leave on penalty of a misdemeanor offense)

7
8 70. Despite the illegality of the encampment, Defendants did
9 nothing to remove it or to hold those responsible to account.

10 71. On the contrary, Defendants, including specifically
11 Defendant Block, shamefully instructed UCLAPD to “stand down,” and
12 not to interfere with the activists.²⁶

13 72. Worse still, UCLA security actually facilitated the activists
14 in achieving their goals. Shortly after the encampment was established
15 and as activists sought to carve out as wide an “exclusion zone” as
16 possible, rather than immediately pushing back and preventing the
17 unlawful takeover of a portion of the UCLA campus, UCLA security
18 helped the activists establish a “border” to keep non-activists out by
19 setting up metal bicycle racks as barricades around the encampment.²⁷
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25 ²⁶ Declaration of Kamran Shamsa ISO Plaintiffs’ Mot. for Preliminary
26 Injunction, 24-cv-04702-MCS-PD (C.D. Cal.) [Dkt. 64-3] ¶ 12.

27 ²⁷ Declaration of Michael Beck IOT Plaintiffs’ Mot. for Preliminary
28 Injunction, 24-cv-04702-MCS-PD (C.D. Cal.) [Dkt. 62-3] ¶ 6.

1 In other words, Defendants facilitated the acquisition of “territory” by
2 the activists.

3
4 73. UCLA publicly justified its extreme passivity toward (and
5 indeed participation in) the illegal encampment by reference to its
6 purported commitment to “free speech.”
7

8 74. In reality, UCLA knew that the activists were operating very
9 far beyond the outer limits of permissible speech, and were engaging in
10 widespread violations of campus rules, state laws, and criminal
11 statutes. UCLA’s passivity was not borne out of a commitment to free
12 speech principles, it instead represented agreement with the point of
13 view held by the anti-Israel activists.²⁸
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20 ²⁸ UCLA recently announced a policy against its top leadership
21 “mak[ing] public statements on [most] societal, public and political
22 matters.” [https://evcp.ucla.edu/announcements/2023-24/resources-
23 related-to-free-expression-safety-and-well-being-at-ucla/#statement-on-
24 statements](https://evcp.ucla.edu/announcements/2023-24/resources-related-to-free-expression-safety-and-well-being-at-ucla/#statement-on-statements) (Sept. 12, 2024). Of course, the fact that UCLA’s leaders
25 may refrain from making public statements on social and political
26 issues does not mean that they lack views on those issues, or that they
27 will not act on their views. As detailed throughout this complaint,
28 UCLA’s leaders disagree with and have actively suppressed Plaintiffs’
point of view. Nothing about the new policy on public statements
changes this.

1 75. Around May 1, 2024, after negative press reports concerning
2 the encampment became too intense to ignore, Defendants finally
3 sought the help of the Los Angeles Police Department. The
4 encampment was cleared as of May 2, 2024.
5

6 76. While the UCLA campus was mostly empty during the
7 summer break, and anti-Israel activity was muted, students returned to
8 campus for the start of the new year around September 23, 2024. A
9 judge in this district recently held there to be “an imminent risk that []
10 exclusion [of Jewish students by anti-Israel activists from parts of
11 campus] will return in the fall with students, staff, faculty, and non-
12 UCLA community members.” *Frankel*, 2024 WL 3811250, at *5.
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16
17 ***In a Contrast That Could Not Be More Pronounced, UCLA Treats***
18 ***Pro-Israel Speech—including Plaintiffs’ Speech—with Disdain***

19 77. UCLA is anything but accommodating or solicitous to
20 student or faculty groups that seek to promote conservative and pro-
21 Israel views.
22

23 78. Even before the Plaintiffs in this lawsuit sought to stage an
24 educational event in May 2024, UCLA allowed anti-Israel activists to
25 intimidate other speakers.
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1 79. In February 2024, a talk sponsored by the Younes and
2 Soraya Nazarian Center for Israel Studies to take place in Royce Hall
3 by former Israeli Minister of Foreign Affairs Tzipi Livini was
4 threatened by anti-Israel activists. Rather than addressing the threats,
5 the University let the mob win, as the talk retreated to an online-only
6 format.²⁹
7

8
9 80. Next, it was Plaintiffs' turn to attempt to bring ideological
10 balance and a different point of view to the UCLA campus. In the
11 spring of 2024, Plaintiff Broll and other members of YAF at UCLA
12 decided to invite Middle East expert Robert Spencer to UCLA through
13 YAF's Campus Lectures program. Mr. Spencer would give a talk
14 providing a counterpoint to the campus orthodoxy on the Israel/Hamas
15 conflict and the question of Israel's legitimacy more broadly. The talk
16 was to be followed by an open question and answer ("Q&A") period
17 during which audience members, including both pro-Israel and anti-
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26 ²⁹ Michael Starr, *Tzipi Livni UCLA talk moved online after anti-Israel*
27 *protest*, THE JERUSALEM POST (Feb. 28, 2024),
28 <https://www.jpost.com/diaspora/antisemitism/article-789482>.

1 Israel students, would be invited to raise questions, share views, and
2 participate in an exploration of these vital public questions.

3
4 81. Mr. Spencer is the founder of Jihad Watch, an organization
5 dedicated to exposing dangerous and radical strains of Islamic thought.

6
7 82. On or around April 13, 2024, YAF at UCLA Chairman,
8 Matthew Weinberg, contacted representatives of the UCLA Student
9 Organizations, Leadership & Engagement (“SOLE”) office and the
10 Associated Students of UCLA (“ASUCLA”) to reserve a room in the
11 Student Union, and to work out logistics, for the Robert Spencer talk,
12 then titled “Radical Islam on College Campuses” (the name would later
13 be changed to “Everything You Know About Palestine Is Wrong”).
14 SOLE is the administrative unit responsible for approving speaking
15 events. Defendant Cohn is the director of SOLE and all of its employees
16 report to Defendant Cohn.
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21 83. On April 16, 2024, the Student Union confirmed that a
22 suitable conference room was available on May 15, 2024. Mr. Weinberg
23 immediately responded, attempting to lock in a reservation for that
24 date. UCLA did not timely reply.
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1 84. On April 22, 2024, after five days without a response, Mr.
2 Weinberg again followed up to determine whether the room reservation
3 had been finalized and to address a few logistical issues. Among other
4 things, Mr. Weinberg requested campus security for the event,
5 including a UCLAPD presence to contend with possible counter-
6 protestors.
7
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9 85. Again, UCLA failed to timely respond to Mr. Weinberg's
10 April 22, 2024 security request, or to his April 23, 2024 email again
11 asking for confirmation that security would be provided.
12
13

14 86. In the meantime, Plaintiffs expended time, money and
15 resources designing promotional materials to advertise the Robert
16 Spencer event. Plaintiffs sought to provide a perspective on the
17 Israel/Hamas war that was almost entirely absent from the UCLA
18 campus. They hoped to reach a significant number of individuals and
19 welcomed especially students who held anti-Israel views. Plaintiffs
20 believe in the power of open and free discussion and the value of
21 bringing people with diverse views together. Even if anti-Israel
22 students were not ultimately persuaded by Mr. Spencer, Plaintiffs
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1 would have viewed the event to be a success simply by raising questions
2 that had not previously occurred to those students.

3
4 87. Without official approval by UCLA of the event, however,
5 Plaintiffs were prevented from distributing promotional materials.

6
7 88. As time before the event grew shorter and shorter, Plaintiffs'
8 ability to effectively use pre-event publicity was, of course, diminished
9 further and further.

10
11 89. On April 26, 2024, Mr. Weinberg spoke with Kenneth Qian,
12 a direct report of Defendant Cohn. Mr. Qian stated that as far as he
13 was concerned, the event was approved, but that he needed to confirm
14 with Defendant Cohn personally and would get back to Mr. Weinberg
15 ASAP. Neither Mr. Qian nor Mr. Cohn timely followed up with Mr.
16
17
18 Weinberg.

19
20 90. On April 29, 2024, a full week after requesting security for
21 the event, but having not received any official communications from
22
23 UCLA, Mr. Weinberg again wrote to Defendant Cohn and his reports to
24 confirm the room reservation and security arrangements. Mr.
25
26 Weinberg also indicated that if a response was not immediately
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1 forthcoming, he would have no choice but to escalate the matter to the
2 office of the Chancellor.

3
4 91. On information and belief, however, the Chancellor's office
5 was already aware of Plaintiffs' plans to bring Mr. Spencer to the UCLA
6 campus. Given the years' worth of campus activism on the anti-Israel
7 side tacitly and sometimes explicitly approved by Defendants, it strains
8 credulity to believe that when Plaintiffs' indicated they were seeking to
9 host Mr. Spencer to discuss "Radical Islam on College Campuses," (as
10 the talk was originally titled), the leadership of the university was not
11 immediately informed.
12
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15 92. In any event, on April 30, 2024, UCLA finally responded to
16 Plaintiffs' numerous inquiries concerning logistics and security for the
17 Robert Spencer talk. Defendants organized a Zoom meeting involving
18 Defendant Cohn's reports, representatives from UCLAPD, the UCLA
19 Deputy Fire Marshall, and several other high-level administrators. On
20 Plaintiffs' side, YAF Campus Event Coordinator, Breana Marsh, YAF
21 Associate General Counsel Madison Hahn, Ms. Broll, and Mr. Weinberg
22 attended.
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1 93. Much of the discussion centered on security.

2 Representatives from UCLAPD stated that the decision on university-
3 provided security would be made after the call by the top levels of
4 university administration, specifically including individuals at a higher
5 level than the Chief of Police for UCLAPD.
6
7

8 94. The UCLAPD representative also stated that the decision
9 would depend on whether the encampment, then on its sixth day, was
10 still there on May 15, 2024, in which case there might be a “large
11 population of [anti-Israel] people on our campus” who would likely
12 object to and seek to shut down the Robert Spencer event. (As it turned
13 out, the encampment would be disbanded two days later on May 2,
14 2024).
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18 95. The meeting ended in an entirely unsatisfactory manner.
19 UCLA refused to approve the event or to commit to providing security.
20 UCLA further refused to provide even a timeline for when it might
21 approve the event. As the event was then a mere 15 days away,
22 Plaintiffs’ ability to engage in adequate pre-event publicity was
23 diminishing rapidly.
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1 96. In the face of UCLA’s refusal to commit to anything related
2 to the Robert Spencer event, and with time running down, on May 1,
3 2024, undersigned counsel sent a letter to UCLA’s Chief Campus
4 Counsel, demanding that the university approve the event immediately
5 and noting the possibility of litigation. A true and correct copy of the
6 letter is attached as Exhibit B. The letter pointed out that UCLA and
7 its leadership were liable for engaging in viewpoint discrimination
8 against conservative and pro-Israel speech and that giving in to a
9 potential “heckler’s veto” by agitators could further expose the
10 university to liability.
11

12 97. While UCLA’s counsel did not respond in writing, at 9:28
13 p.m. that same night, UCLA suddenly changed its tune.
14 Representatives from the Student Union, who had been silent for over a
15 week sent an email to confirm administrative details for the event. By
16 May 6, 2024, all outstanding administrative items were completed, and
17 UCLA appeared to provide final approval for the event – albeit with
18 only a week to spare.
19

20 98. After receiving approval on May 6, 2024, Plaintiffs
21 immediately began generating publicity and advertisements.
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1 99. For example, Plaintiff Broll personally began an intensive
2 campaign of flyering on campus bulletin boards, handing out palm
3 cards, and putting up posters in campus dormitories. Ms. Broll spent
4 substantially all of her free time in the brief lead up to the event
5 seeking to get the word out.
6
7

8 100. For another example, Plaintiff Roepke tabled and passed out
9 flyers during the week leading up to the event. Ms. Roepke also visited
10 UCLA dormitories in the middle of the night to advertise the talk.
11

12 101. Given the short time, however, the effectiveness of these
13 efforts was blunted.
14

15 102. During the evening of May 14, 2024, Plaintiffs Broll and
16 Roepke, along with other YAF at UCLA members attempted a last-
17 minute publicity push by projecting an announcement on the outside of
18 a campus building. The projection was approximately twenty feet high,
19 and was designed to attract attention.
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22 103. During this publicity push, anti-Israel activists accosted
23 Plaintiffs, threatening to “shut down” the Robert Spencer talk.
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1 104. The activists also asserted that projecting an image on the
2 side of a UCLA building was in violation of campus rules. This was
3 incorrect. There was no such rule.
4

5 105. In any event, the activists stated that they would report
6 Plaintiffs to campus authorities. Within hours, UCLA Dean of
7 Students, Defendant Rush, called Plaintiffs and threatened disciplinary
8 action if they did not immediately stop their promotional activities.
9 While there were no campus rules prohibiting their activity, and
10 Defendant Rush could not cite one, Plaintiffs acquiesced to Defendant
11 Rush's demands and stopped promoting the Robert Spencer talk out of
12 fear that Defendant Rush would ban their event.
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17 106. Despite the many roadblocks thrown up by Defendants, and
18 despite the diminished effectiveness of Plaintiffs' publicity efforts
19 caused by Defendants, a substantial number of students and
20 community members planned to attend the lecture on May 15, 2024.
21
22

23 ***At the Last Minute, UCLA Canceled the Robert Spencer***
24 ***Talk Without Warning***

25 107. On the afternoon of May 15, 2024, the day of the event, when
26 an advance team including Plaintiffs Broll and Roepke, Ms. Marsh and
27 YAF Program Officer for Campus Advancement Aléjandro Flores
28

1 arrived to inspect the event space, they were told by UCLA staff to
2 leave the room, which was then locked against their re-entry.

3
4 108. What followed was a lengthy game of “who has the key,” that
5 would have been comical, but for the fact that Plaintiffs’ First
6 Amendment rights were at stake. Specifically, representatives from the
7 Student Union and from SOLE falsely stated that now that the lecture
8 room was locked, they were unable to find a key to re-open it for
9 Plaintiffs.
10
11

12 109. This was transparently an attempt to stall for time. Indeed,
13 about two hours after Defendants locked the door to the event space
14 (but somehow could not find the key), Defendant Braziel contacted YAF
15 personnel on site by telephone. Defendant Braziel stated that UCLA
16 had made a determination that it was unprepared to provide adequate
17 security for the Robert Spencer event in the assigned location because of
18 the possibility of counter protest activity by anti-Israel activists.
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22 110. Anti-Israel activists had posted on social media that they
23 would seek to “cancel” and “shut down” the event, but at the time UCLA
24 made its determination, no appreciable protest activity had taken place.
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1 111. In deference to potential counter-protestors, Defendant
2 Braziel stated that the talk could go forward only if Plaintiffs agreed to
3 move it to a different part of the UCLA campus in an out-of-the-way
4 location in a computer science lecture hall behind the Geology building,
5 approximately a half-mile from the Student Union complex and the
6 center of campus.
7
8

9 112. Defendant Braziel did not explain why the agreed-upon
10 venue in the Student Union complex could not be adequately secured.
11 Contrary to Defendant Braziel’s unexplained assertion, there was no
12 reason that the Student Union location could not be adequately secured.
13
14

15 113. Defendant Braziel also did not explain why moving to the
16 out-of-the-way alternative location would present fewer security
17 challenges than the Student Union location.
18

19 114. Moreover, the alleged security concerns were not reasonable.
20 UCLA had had weeks to prepare for the possibility of counter-
21 protestors. If there were real “security concerns,” there is no reason
22 they could not have been raised much earlier, and no reason the parties
23 could not have discussed ways to ameliorate any such concerns.
24 Waiting until the last second to assert such concerns was transparently
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1 a way to play “gotcha” and to bully Plaintiffs into moving to a less
2 effective location.

3
4 115. Moving the event to the remote location would also have
5 been counterproductive from a security perspective. UCLA was
6 purportedly concerned with the possibility of illegal or violent conduct
7 by counter-protestors seeking to shout down and disrupt conservative,
8 pro-Israel speakers on campus. But giving in to the demands of
9 potentially violent and disruptive counter protestors is not a way to
10 prevent violence or to enhance campus security—indeed, giving in
11 would have exactly the opposite effect by encouraging more of the same
12 in the future. *See, e.g. Dariano v. Morgan Hill Unified Sch. Dist.*, 767
13 F.3d 764, 770-71 (9th Cir. 2014) (O’Scannlain, dissenting from denial of
14 reh’g *en banc*) (when school authorities give in to the demands of
15 hecklers, they create “perverse incentive[s]” and send a message that
16 “by threatening violence against those with whom you disagree, you can
17 enlist the power of the State to silence them.”).

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24 116. Moving to the out-of-the-way location was also not a
25 reasonable or neutral alternative to holding the event in the planned
26 Student Union space.
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1 117. Among other things, changing the location at the last second
2 without any advance warning would limit attendance. Moreover, unlike
3 the approved location, there was very limited foot traffic at the
4 alternative location, reducing the possibility for passersby to attend and
5 further suppressing turnout.
6
7

8 118. The alternative location was also inappropriate for the
9 audio-visual equipment that Plaintiffs had long intended to use to
10 capture the event for later broadcast. Plaintiffs had previously
11 informed Defendants of their intention to record the event and had
12 specified their audio-visual and filming requirements.
13
14

15 119. Contrary to Defendant Braziel's assertions, Defendants'
16 demand that the event be moved to the out-of-the-way location was not
17 a security-driven decision. Instead, it was meant to thwart the ability
18 of Mr. Spencer to reach his intended audience.
19
20

21 120. Moreover, holding the event in the central Student Union
22 complex was part of the communicative message. Plaintiffs deserved
23 not only to host a pro-Israel event, they deserved to host it in the center
24 of campus life to show that there are other legitimate views worth
25 discussing on the issue of Israel and that their speech did not represent
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1 a second class point of view, no matter how out of step with the
2 fashionable elite ideologies of UCLA’s leadership and activist class.

3
4 121. Forcing the event to retreat to an outer-campus computer
5 science lecture hall, on the other hand, would also have sent a
6 message—that UCLA disagreed with the distasteful opinions of pro-
7 Israel speakers like Robert Spencer; that the university sided with the
8 counter-protestors who sought to shut Mr. Spencer down; and that the
9 university’s commitment to “free expression” was merely a front.
10
11

12 122. Defendants would not even consider adopting a policy that if
13 a student or visitor to the UCLA campus was assaulted or threatened
14 by a group of common criminals UCLA’s response should be to remove
15 the victims of the assault from the vicinity. UCLA would, of course,
16 protect the targets, and would enforce its neutral campus rules and the
17 criminal laws of the state of California against the perpetrators.
18
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21 123. UCLA owes the same duty to individuals who are threatened
22 on the basis that they have a disfavored viewpoint. As the Ninth
23 Circuit held long ago, “[i]t is clear to us that [campus] police had the
24 obligation of affording [a controversial speaker] the same protection
25 they would have surely provided an innocent individual threatened, for
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1 example, by a hoodlum on the street. A politically motivated assault is
2 no less illegal than assaults inspired by personal vengeance or by any
3 other unlawful motive.” *Jones v. Bd. of Regents of U. of Ariz.*, 436 F.2d
4 618, 621 (9th Cir 1970).

5
6 124. By Defendant Braziel’s refusal to allow the event to go
7 forward as planned and his denial of security at the original location, he
8 forced its cancellation. As a result, UCLA prevented Mr. Spencer from
9 giving his talk and reaching his intended audience.
10

11
12 125. Anti-Israel activists celebrated Defendants’ cancellation of
13 the Robert Spencer event. For example, an activist bragged on social
14 media, “Yes . . . WE LOCKED THEM OUT. The @UCLA [activist]
15 community succeeded in LOCKING THE DOORS on the virulently
16 anti-Palestinian Robert Spencer on May 15 as he planned to speak.”³⁰
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19
20 ***UCLA Acted Pursuant to Policies that Grant Unbridled***
21 ***Discretion to Impose Onerous “Security Measures” on Peaceful***
22 ***Speech***

23 126. In making a determination that “safety and security”
24 concerns empowered it to unilaterally move the Robert Spencer event to
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26
27 ³⁰ Linda Mamoun (@mamoun_linda) (May 20, 2024),
28 https://x.com/mamoun_linda/status/1792666950461735225.

1 an out-of-the-way alternative location at the last moment, UCLA acted
2 pursuant to UCLA Interim Policy 862.

3
4 127. The version of Interim Policy 862 in effect during April and
5 May 2024 is attached as Exhibit C. The Policy was updated on
6 September 4, 2024. However, with minor exceptions noted below, the
7 relevant provisions did not undergo substantive changes. The
8 September 4, 2024 version is attached as Exhibit D.³¹

9
10
11 128. Under both versions of Policy 862, pursuant to an
12 assessment of “safety and security needs,” UCLA may impose a number
13 of “security measures” that can impact the ability of a speaker to reach
14 his or her intended audience and that can generally undermine the
15 success of a planned event. Exhibit C ¶ IV.B.1 & Exhibit D, Interim
16 Policy 862 ¶ III.G (authorizing UCLA to do such things as “adjust[] the
17 venue, date, and/or time of the event, . . . [and] impos[e] controls or
18 security checkpoints” in the area). UCLA can also cancel events after
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26 ³¹ Exhibit D incorporates both the September 4, 2024 version of Interim
27 Policy 862, and the September 4, 2024 version of Interim Policy 850,
28 which now contains definitions relevant to the interpretation of Interim
Policy 862.

1 they have begun for alleged safety reasons. UCLA Interim Policy 860

2 ¶ III.I.³²

3
4 129. The policy provides no guidance for imposing these
5 measures, other than pointing to a non-exhaustive list of “safety and
6 security criteria,” and admonishing UCLA officials to “base [their
7 determinations] on objective and credible evidence of specific risks” and
8 to use “professional judgment.” Exhibit C ¶ IV.B.1; *see also* Exhibit D,
9 Interim Policy 862, ¶ III.G.

10
11
12 130. The non-exhaustive list of criteria to be considered under the
13 old version consisted of:

14
15 “(a) the proposed location of the event, (b) the estimated number of
16 participants, (c) the time of the day that the event is to take place,
17 (d) the date and day of the week of the event, (e) the proximity of
18 the event to other activities or locations that may interfere,
19 obstruct, or lessen the effectiveness of the security measures being
20 implemented, (f) the resources needed to secure the event, (g) the
21 anticipated weather conditions, (h) the estimated duration of the
22 event, (i) any objective and credible evidence regarding actual
23 threats to campus safety or security, and (j) any similar viewpoint-
and content-neutral considerations relevant to assessment of
campus safety, security, and services.”

24 Exhibit C, ¶ III.C.

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27
28 ³² <https://www.adminpolicies.ucla.edu/pdf/860.pdf>

1 131. The new version contains essentially the same list of
2 criteria, with the only material changes being the addition of a new
3 consideration as to whether alcohol will to be served, and a change of
4 the criteria based on “. . . evidence regarding *actual* threats to campus
5 safety or security,” to “. . . evidence regarding *possible* threats.”
6
7 *Compare* Exhibit C, ¶ III.C *with* Exhibit D, Interim Policy 850,
8 Attachment A (Definition of “Safety and Security Criteria”)(emphases
9 added).
10
11

12 132. The Policy does not require UCLA to explain the basis for
13 any security measures and provides no further guidance on the
14 application of the various criteria to the determination of a safety and
15 security need. The policy does not give UCLA administrators any
16 guidance as to how to weigh the existence or absence of different
17 criteria, does not define relevant terms, and does not give precise
18 criteria for application of the rule.
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22 133. Because UCLA’s policies confer essentially unrestrained
23 discretion on officials to impose onerous conditions on free speech, they
24 are facially overbroad and unconstitutional.
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1 ***Plaintiffs Suffered and Continue to Suffer Harm from***
2 ***Defendants' Constitutional Violations***

3 134. Defendants thwarted Plaintiffs' efforts to reach an audience
4 with pro-Israel and conservative messages on May 15, 2024.

5 135. Defendants also harmed Plaintiff Broll by violating her right
6 as an audience member to listen to pro-Israel and conservative
7 messages on May 15, 2024. Robert Spencer was ready and willing to
8 speak; Ms. Broll was ready and willing to listen; and but for
9 Defendants' unconstitutional conduct, Ms. Broll would have been able
10 to receive expressive content from Mr. Spencer on May 15, 2024.

11 136. Defendants also harmed Plaintiff Broll by violating her right
12 to participate in a unique public dialog concerning the state of Israel
13 and its enemies on May 15, 2024. The planned Robert Spencer event
14 was to consist of both a lecture by Mr. Spencer and a question and
15 answer ("Q&A") period during which audience members would be
16 invited to share their views, raise questions, and engage in open public
17 inquiry and dialog concerning the underlying issues. Ms. Broll intended
18 to participate in the Q&A and to listen, learn from, and engage with the
19 views of other audience members—including anti-Israel audience
20 members. Given that pro-Israel and conservative points of view are
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1 vastly underrepresented on the UCLA campus, this opportunity was
2 unique and important. Defendants’ conduct thwarted Ms. Broll’s ability
3 to engage in open discourse and inquiry at the May 15, 2024 event.
4

5 137. Defendants also harmed Plaintiff Roepke by violating her
6 right as an audience member to listen to pro-Israel and conservative
7 messages on May 15, 2024. Robert Spencer was ready and willing to
8 speak; Ms. Roepke was ready and willing to listen; and but for
9 Defendants’ unconstitutional conduct, Ms. Roepke would have been able
10 to receive expressive content from Mr. Spencer on May 15, 2024.
11

12 138. Defendants also harmed Plaintiff Roepke by violating her
13 right to participate in a unique public dialog concerning the state of
14 Israel and its enemies during a Q&A session on May 15, 2024. Ms.
15 Roepke intended to participate in the Q&A and to listen, learn from,
16 and engage with the views of other audience members—including anti-
17 Israel audience members.
18

19 139. Plaintiffs have suffered irreparable harm as a result of
20 Defendants’ conduct because the “loss of First Amendment freedoms, for
21 even minimal periods of time, unquestionably constitutes irreparable
22 injury.” *Elrod v. Burns*, 427 U.S. 347, 373 (1976).
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1 140. Plaintiffs have also suffered pecuniary harm as a direct
2 result of Defendants' unlawful actions. These include, but are not
3 limited to, amounts YAF expended in preparation for the Robert
4 Spencer event such as staff time designing communications materials
5 and organizing the event, travel expenses for the YAF advance team,
6 and film crew costs.
7
8

9 141. YAF has also been harmed in its ability to act as an effective
10 conservative advocacy organization. Among other things, to the extent
11 Defendants undercut YAF's ability to stage a successful event,
12 recruitment of potential members has been made that much harder.
13 Students are less likely to join an organization that may be perceived as
14 disfavored by the administration. YAF has also suffered from a
15 diminished capacity to raise funds for similar reasons caused by
16 Defendants' conduct.
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21 142. Plaintiffs Broll and Roepke have also been harmed because
22 they expended considerable personal energy and time to promote and
23 facilitate the May 15, 2024 speech by Robert Spencer, which
24 expenditures of energy and time were rendered futile by Defendants'
25 unconstitutional conduct.
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1 143. An award of compensatory damages would not be sufficient
2 to deter Defendants from further violations of the First Amendment
3 against conservative and pro-Israel speakers. Accordingly, an award of
4 punitive damages is appropriate and necessary to deter further
5 violations by Defendants.
6
7

8 ***Plaintiffs Intend to Bring More Ideological Diversity to***
9 ***the UCLA Campus But There is an Imminent***
10 ***Likelihood that UCLA Will Again Violate Plaintiffs'***
11 ***Rights***

12 144. Plaintiffs have a continuing right to express themselves on
13 campus, despite Defendants' hostility to their points of view.
14

15 145. Plaintiffs are planning a series of campus events during the
16 2024-25 school year. The events will present conservative and pro-
17 Israel viewpoints that stand in stark contrast to the views of UCLA's
18 leaders, much of its faculty, and its activist class. Given UCLA's past
19 conduct discriminating against conservative and pro-Israel points of
20 view, there is an imminent likelihood that UCLA will violate Plaintiffs'
21 constitutional rights again.
22
23

24 146. Even worse, shortly before the start of the 2024-2025 school
25 year, on September 4, 2024, UCLA adopted a series of new regulations
26 governing campus speech that essentially enshrine viewpoint
27
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1 discrimination and the heckler's veto against conservative and pro-
2 Israel speakers as the official policy of the university. The policies
3 effectively place a cap on the number of pro-Israel and conservative
4 speaking events on campus for the school year, while allowing an
5 unlimited number of left-wing and anti-Israel speakers to present their
6 views. The policies also incentivize left-wing activists to create as much
7 mayhem as possible during conservative events, so as to more quickly
8 reach the speech cap set forth in UCLA's new rules.
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12 147. Under UCLA's new policies, organizers of campus events
13 must notify UCLA whenever a "a possible demonstration [is] likely to
14 occur." UCLA Interim Policy 860 ¶ III.K.³³ If such a demonstration
15 "could disrupt the event, the event will be deemed a Major Event and
16 subject to UCLA Policy 862, Major Events." *Id.* ¶ III.J.
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20 148. As soon as UCLA has expended a certain fixed annual sum
21 on security costs for "respond[ing] to Public Expression Activities [i.e.,
22 counter protests]" against so-called "Major Events," the university will
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27 ³³ <https://www.adminpolicies.ucla.edu/pdf/860.pdf>.
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1 not allow any more such events “for the remainder of the academic
2 year.” UCLA Interim Policy 862 ¶ III.F.³⁴

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4 149. Of course, since anti-Israel and progressive points of view
5 represent the overwhelming orthodoxy on campus, and since there is no
6 history of conservative and pro-Israel activists seeking to “cancel” or
7 “shout down” approved campus events featuring anti-Israel and left-
8 wing speakers, almost all approved events featuring speakers with anti-
9 Israel and left-wing points of view will escape the “Major Event”
10 designation under UCLA’s policies.

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14 150. For the same reasons, UCLA does not incur “security costs . .
15 . to respond to Public Expression Activities” against approved anti-
16 Israel and left-wing speech.

17
18 151. Accordingly, left-wing student organizations like SJP will be
19 able to stage as many official anti-Israel speaking events as they like
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24 ³⁴ The policy divides the annual spending cap into three categories,
25 depending on whether the events are hosted by RCO’s, University Units
26 or Non-Affiliates. *Id.* The policies also state that once a cap on Major
27 Events has been triggered, no more will be scheduled for the academic
28 year, “except that any Major Event that is already scheduled and
approved . . . will be permitted to proceed.” *Id.*

1 without any realistic possibility that they will be shut down because
2 UCLA has reached its arbitrary cap on security spending.

3
4 152. In contrast, conservative and pro-Israel events, such as the
5 ones to be staged by Plaintiffs in the 2024-25 school year, will be
6 deemed Major Events every time. Anti-Israel and left-wing activists
7 have pledged to “shut down” and “cancel” pro-Israel and conservative
8 speakers. And, given UCLA’s cap on security spending to prevent left-
9 wing and anti-Israel hecklers from disrupting pro-Israel speech, the
10 Major Events policy will act as a de facto ceiling on the number of
11 conservative and pro-Israel events on campus.
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15 153. Moreover, given the security spending cap, UCLA’s policies
16 generate a perverse incentive for left-wing and anti-Israel hecklers to
17 create as much mayhem as possible in response to conservative and pro-
18 Israel speakers. Those activists will know that once they cause enough
19 damage and disruption to raise UCLA’s security spending above the
20 monetary threshold, no more conservative and pro-Israel speakers will
21 be allowed for the remainder of the year. The incentive for left-wing
22 and anti-Israel activists to bring violence and mayhem to campus is
23 obvious.
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1 154. Plaintiffs have already planned their first event for the
2 2024-25 school year. On October 21, 2024, YAF at UCLA will host Ben
3 Shapiro, a well-known conservative and pro-Israel speaker.
4

5 155. Plaintiff YAF has already expended resources planning and
6 promoting the upcoming event and will continue to do so.
7

8 156. Once UCLA approves the event, Plaintiffs Broll and Roepke
9 will engage in publicity and advertising activities on the UCLA campus.
10

11 157. Plaintiffs Broll and Roepke also intend to attend the
12 presentation as audience members and to exercise their right to listen
13 to Mr. Shapiro's views.
14

15 158. Plaintiff Broll and Roepke also intend to participate in a
16 public dialog with both pro- and anti-Israel students during the post-
17 talk Q&A session.
18

19 159. Anti-Israel and left-wing groups will almost certainly
20 threaten counter-protests and will seek to "cancel" the event.
21

22 160. Given Defendants' past conduct, there is a substantial and
23 imminent threat that they will again cave in to the demands of the anti-
24 Israel activists and allow the event to be defeated at the last minute.
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1 166. Defendants violated the prohibition against viewpoint
2 discrimination by applying vastly different standards to anti-Israel
3 activities (treated with extreme deference, even to the point of
4 tolerating clearly unlawful and criminal behavior) and pro-Israel
5 expression (treated to extreme vetting, exacting review, and last minute
6 cancellation).
7
8

9 167. Defendants subjected Plaintiffs' speech to these double
10 standards because they disagree with Plaintiffs' point of view.
11

12 168. Indeed, UCLA's new policies on campus events, adopted on
13 September 4, 2024, effectively cap the number of pro-Israel and
14 conservative events that Plaintiffs can host on campus for the 2024-25
15 school year, while allowing an unlimited number of anti-Israel and left-
16 wing events to occur.
17
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19 169. In discriminating against Plaintiffs' point of view,
20 Defendants acted pursuant to an unwritten, but firmly entrenched,
21 policy and practice to discriminate against conservative and pro-Israel
22 points of view. Absent injunctive relief from the Court, that policy and
23 practice will continue into the future.
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1 170. Defendants violated, and are continuing to violate, clearly
2 established First Amendment law.
3

4 **SECOND CLAIM FOR RELIEF**
5 **42 U.S.C. § 1983 – First Amendment Violation**
6 **Heckler’s Veto**

7 171. Plaintiffs reallege and incorporate by reference the
8 allegations set forth above as if fully set forth herein.
9

10 172. Even if Defendants could reasonably be viewed as neutral or
11 indifferent with respect to the topic of Israel, they nevertheless violated
12 the First Amendment prohibition on viewpoint discrimination by caving
13 in to the demands of anti-Israel protestors who set out to cancel and
14 “shout down” Plaintiffs’ expression.
15

16 173. Where, as here, the government gives effect to a “heckler’s
17 veto” against a speaker, it is “simply choosing sides in the debate.”
18 *Meinecke v. City of Seattle*, 99 F.4th 514, 524 (9th Cir. 2024). This is yet
19 another form of viewpoint discrimination, unlawful under the First
20 Amendment. *Id.*
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22 174. Under clearly established law, Defendants’ conduct in caving
23 in to the wishes of the anti-Israel objectors violated the First
24 Amendment.
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1 175. In caving in to the wishes of anti-Israel and left-wing
2 activists, Defendants acted pursuant to an unwritten, but firmly
3 entrenched, policy and practice to discriminate against conservative
4 and pro-Israel points of view. Absent injunctive relief from the Court,
5 that policy and practice will continue into the future.
6
7

8 **THIRD CLAIM FOR RELIEF**
9 **42 U.S.C. § 1983 – First Amendment Violation**
10 **Vagueness and Overbreadth – Interim Policy 862**

11 176. Plaintiffs reallege and incorporate by reference the
12 allegations set forth above as if fully set forth herein.
13

14 177. The First Amendment demands that policies and ordinances
15 “give the person of ordinary intelligence a reasonable opportunity to
16 know what is prohibited[.]” *Grayned v. City of Rockford*, 408 U.S. 104,
17 108 (1972).
18

19 178. Vague policies raise due process concerns because they force
20 individuals to guess at their meaning. *Id.* at 108–09. As a result of this
21 vagueness, individuals “steer far wider of the unlawful zone . . . than if
22 the boundaries of the forbidden areas were clearly marked.” *Id.* at 109
23 (internal quotation marks and citations omitted).
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1 179. And when policies by their reach “prohibit[] constitutionally
2 protected conduct” and chill speech as a result, they are
3 unconstitutionally overbroad on their face. *Id.* at 114; accord *Forsyth*
4 *Cnty., Ga. v. Nationalist Movement*, 505 U.S. 123, 129-30 (1992).
5

6 180. Vague and overbroad policies are also unconstitutional
7 because they give officials unfettered discretion to approve or censor
8 speech based on its viewpoint or content. *Forsyth Cnty.*, 505 U.S. at
9 130–33.
10

11 181. Interim Policy 862 is unconstitutionally vague and
12 overbroad on its face because it provides a non-exhaustive list of factors
13 to consider when determining whether and what kind of “security
14 measures” to impose for an event. The policy does not explain how each
15 factor impacts the need for a particular “security measure.” And the
16 policy does not include precise guidelines for administrators to follow
17 when weighing the factors, but instead leaves it to an individual
18 administrator’s discretion whether an event should be subject to
19 security measures.
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1 182. Defendants’ enforcement of the policy vests unbridled
2 discretion in a government official to decide what speech is
3 controversial enough to require security measures.
4

5 183. As a result of the policy, Plaintiffs are deterred from
6 facilitating future speaking events on campus because they cannot
7 predict whether their events will be subjected to last minute
8 modifications to such things as the event venue, number of attendees,
9 time and other factors.
10
11

12 184. In these ways, because Interim Policy 862 gives unbridled
13 discretion to university officials to determine whether and what kind of
14 “security measures” should be imposed, the policy opens the door to
15 unconstitutional content and viewpoint discrimination.
16
17

18 **RELIEF REQUESTED**

19 Plaintiffs respectfully request that this Court:
20

21 A. Enter a declaratory judgment that Defendants violated
22 Plaintiffs’ First Amendment rights by engaging in viewpoint
23 discrimination;
24

25 B. Enter a declaratory judgment that Defendants violated
26 Plaintiffs’ First Amendment rights by sanctioning a “heckler’s veto”
27
28

1 C. Enter a declaratory judgment that Interim Policy 862 is
2 overbroad and facially unconstitutional;

3
4 D. Enter preliminary and permanent injunctions prohibiting
5 Defendants from engaging in viewpoint discrimination against
6 conservative and pro-Israel speech;

7
8 E. Enter preliminary and permanent injunctions prohibiting
9 Defendants from giving effect to unconstitutional “heckler’s vetoes” by
10 limiting conservative or pro-Israel speech in deference to objectors;

11
12 F. Enter preliminary and permanent injunctions prohibiting
13 Defendants from failing to deploy law enforcement to ensure that
14 events presenting conservative or pro-Israel views are not disrupted by
15 objectors;

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18 G. Enter preliminary and permanent injunctions prohibiting
19 Defendants from failing to deter objectors from disrupting conservative
20 or pro-Israel speech by failing to enforce neutral campus rules against
21 disruptive and illegal conduct deployed to “cancel” or “deplatform”
22 disfavored speakers;
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1 H. Enter preliminary and permanent injunctions prohibiting
2 Defendants from enforcing their new caps on so-called Major Events set
3 forth in UCLA Interim Policy 862 ¶ III.F;
4

5 I. Enter preliminary and permanent injunctions prohibiting
6 Defendants from enforcing the facially overbroad and unconstitutional
7 “security measure” rules set forth in Interim Policy 862;
8

9 J. Retain jurisdiction of this matter for the purpose of enforcing
10 the Court’s orders;
11

12 K. Enter an award of actual and special damages in an amount
13 to be proven at trial;
14

15 L. Enter an award of nominal damages;

16 M. Enter an award of punitive damages;

17 N. Enter an award of attorney fees and costs of suit pursuant to
18 42 U.S.C. § 1988 and Fed. R. Civ. P. 54; and
19
20

21 O. Order such other and further relief as the Court may deem
22 just, proper, and appropriate under the circumstances.
23

24
25 **JURY DEMAND**

26 Plaintiffs request a trial by jury on all issues and claims so triable.
27
28

1 DATED this 3rd day of October 2024.
2
3

4 Respectfully submitted,

5 /s/ James Kerwin

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28

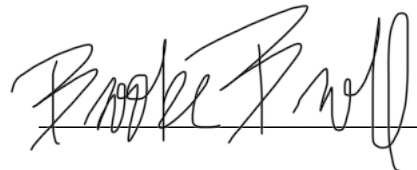
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VERIFICATION

I, BROOKE BROLL, declare as follows:

1. I am a student at the University of California, Los Angeles (“UCLA”).
2. I am a member of UCLA registered student organization, YAF at UCLA, a chapter affiliate of Young America’s Foundation’s Young Americans for Freedom program.
3. I have reviewed this Complaint.
4. For the allegations within my personal knowledge, I believe them all to be true.
5. For the allegations not within my personal knowledge, I believe them all to be true based on my review of the cited policies and documents.
6. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 3rd day of October, 2024.



Brooke Broll

VERIFIED COMPLAINT

VERIFICATION

I, MACY ROEPKE, declare as follows:

1. I am a student at the University of California, Los Angeles (“UCLA”).
2. I am a member of UCLA registered student organization, YAF at UCLA, a chapter affiliate of Young America’s Foundation’s Young Americans for Freedom program.
3. I have reviewed this Complaint.
4. For the allegations within my personal knowledge, I believe them all to be true.
5. For the allegations not within my personal knowledge, I believe them all to be true based on my review of the cited policies and documents.
6. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 2 day of October, 2024.



Macy Roepke

VERIFIED COMPLAINT