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13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**
15 **WESTERN DIVISION**

16 UNITED STATES OF AMERICA,

17 Plaintiff,

18 vs.

19 REGENTS OF THE UNIVERSITY OF
20 CALIFORNIA,

21 Defendant.

Case No.: 2:26-CV-01946

**PROSPECTIVE INTERVENOR
PLAINTIFFS' NOTICE OF
MOTION AND MOTION TO
INTERVENE AS PLAINTIFFS**

Hearing Date: May 18, 2026
Hearing Time: 10:00 a.m.
Court: Judge Christina A. Snyder

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1 **TO ALL INTERESTED PARTIES AND THEIR ATTORNEYS OF**
2 **RECORD:**

3 **PLEASE TAKE NOTICE** that on May 18, 2026 at 10:00 a.m., or as soon
4 thereafter as this matter may be heard in First Street Courthouse, 350 W. 1st Street,
5 Los Angeles, CA 90012, Prospective Intervenor Plaintiffs Kira Stein, Vivien Burt,
6 Nir Hoftman, Ian Holloway, Sarah Blenner, Kamran Shamsa, and Ron Avi Astor
7 (“Intervenor Plaintiffs”) will move to intervene in *United States of America v. The*
8 *Regents of the University of California*, Case No. 26-cv-01946 (“United States
9 Complaint”), pursuant to Federal Rule of Civil Procedure 24 and 42 U.S.C. § 2000e-
10 5(f)(1).

11 Intervenor Plaintiffs are entitled to intervene pursuant to Fed. R. Civ. P. 24
12 and 42 U.S.C. § 2000e-5(f)(1). FRCP 24 allows a party, upon timely application, to
13 intervene as a matter of right if given an unconditional right to intervene by a federal
14 statute. Fed. R. Civ. P. 24(a). Here, Intervenor Plaintiffs are aggrieved persons who
15 have been subjected to the same discriminatory conduct alleged by the United States
16 in its Complaint, which involves a Title VII enforcement action, and therefore have
17 the right to intervene pursuant to 42 U.S.C. § 2000e-5(f)(1) (stating that aggrieved
18 persons have the right to intervene to enforce Title VII). Specifically, pursuant to
19 Rule 24(a), Intervenor Plaintiffs are entitled to intervene as of right because 42
20 U.S.C. § 2000e-5(f)(1) grants aggrieved employees an unconditional statutory right
21 to intervene, and their motion has been timely filed. Fed. R. Civ. P. 24(a).
22 Alternatively, permissive intervention is also warranted, as undue delay or prejudice
23 to the parties would not result from intervention. Fed. R. Civ. P. 24(b).

24 Intervenor Plaintiffs’ Motion to Intervene as Plaintiffs is based on this Notice
25 of Motion, and Motion, including a Memorandum of Points and Authorities, the
26 exhibits attached thereto, and the declaration of Andrew W. Gould, and the
27 proposed Complaint in intervention (attached as Exhibit 1).
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Respectfully submitted this 14th day of April 2026.

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1 **I. INTRODUCTION**

2 Prospective Intervenor Plaintiffs, Dr. Kira Stein, Dr. Vivien Burt, Dr. Nir
3 Hoftman, Dr. Ian Holloway, Director Sarah Blenner, Dr. Kamran Shamsa, and Dr.
4 Ron Avi Astor (collectively, “Intervenor Plaintiffs”) respectfully move for leave to
5 intervene as plaintiffs in this lawsuit brought by Plaintiff United States against the
6 Regents of the University of California, Los Angeles (“UCLA” or “Defendant”).

7 In its Complaint, the United States alleges that UCLA is engaged in a pattern
8 or practice of discrimination against Jewish and Israeli employees by failing to
9 prevent and correct antisemitic workplace discrimination since October 2023.
10 Specifically, the United States alleges that UCLA subjected Drs. Holloway and
11 Shamsa to a hostile work environment because of their race, religion, and national
12 origin in violation of Title VII, and retaliated against both professors because they
13 filed EEOC charges. Further, the United States alleges that UCLA subjected other
14 unnamed, aggrieved Jewish and Israeli employees of UCLA to a hostile work
15 environment because of their race, religion, and national origin in violation of Title
16 VII.

17 Apart from Drs. Holloway and Shamsa, who are named as representative
18 parties in the United States’ Complaint, the remaining Intervenor Plaintiffs are
19 among the “unnamed” aggrieved Jewish and Israeli employees also referenced in
20 the United States’ Complaint. Specifically, Dr. Stein, Dr. Burt, Dr. Hoftman, Dr.
21 Astor, and Director Blenner are similarly aggrieved persons who, like Drs.
22 Holloway and Shamsa, have suffered the same pattern and practice of antisemitic
23 discrimination and hostile work environment conditions at UCLA.

24 All Intervenor Plaintiffs have properly exhausted their administrative
25 remedies (*see, infra* Section II (C)), and seek to timely intervene in this case to
26 assert their individual claims under Title VII and state law claims under the
27 California Fair Employment and Housing Act (“FEHA”), Cal. Gov’t Code §§
28 12940, et seq.

1 Pursuant to Local Rule 7-3, counsel for Intervenor Plaintiffs conferred with
2 the parties at least seven days before filing this motion. The United States does not
3 oppose this motion, and the University of California indicated it could not take a
4 position on the motion at the time of the meet and confer.

5 **II. STATEMENT OF FACTS**

6 **A. The United States' Complaint**

7 On February 24, 2026, the United States filed this action pursuant to Sections
8 707 and 706 of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §
9 2000e et seq., against the University of California and its Board of Regents to
10 redress violations of Title VII at UCLA based on race, religion, and national origin
11 discrimination.

12 The facts and allegations underlying Intervenor Plaintiffs' Complaint, as well
13 as their causes of action, are the essentially same as those in the United States'
14 Complaint. Specifically, the United States' Complaint alleges that since October
15 2023, following Hamas' terrorist attacks on Israel, Jewish and Israeli employees at
16 UCLA have been subjected to rampant antisemitic conduct that has created a hostile
17 work environment for them. The Complaint further alleges that UCLA has engaged
18 in a pattern or practice of discrimination by failing to prevent and correct this
19 antisemitic workplace discrimination.

20 The United States' Complaint alleges several Title VII claims against UCLA.
21 Count One alleges, without naming any individual employees, that UCLA is
22 engaged in a pattern or practice of discrimination against Jewish and Israeli
23 employees by failing to prevent and correct antisemitic workplace discrimination
24 since October 2023. Similarly, Count Six alleges, "on behalf of other aggrieved
25 parties," that UCLA discriminated against other, unnamed aggrieved Jewish and
26 Israeli UCLA employees by subjecting them to a hostile work environment based
27 on their race, religion, and national origin.
28

1 Counts II through V address the named representative aggrieved parties—
2 Drs. Holloway and Shamsa. Counts II and IV allege that both professors were
3 subjected to a hostile work environment in violation of Title VII. Specifically, both
4 professors were subjected to antisemitic harassment because of their religion and
5 perceived national origin, including threats, defamatory statements, negative job
6 consequences, humiliating differential treatment, and a disruption to their academic
7 work on campus in violation of Title VII. Next, Count III alleges that UCLA
8 retaliated against Dr. Holloway by unnecessarily informing all faculty in his
9 department that he filed an EEOC charge, and Count V alleges that UCLA retaliated
10 against Dr. Shamsa when it denied him promotional opportunities after he filed an
11 EEOC charge.

12 **B. Intervenor Plaintiffs Are Aggrieved Persons**

13 Each Intervenor Plaintiff is a Jewish faculty member or employee at UCLA
14 who has been subjected to the same discriminatory conduct alleged by the United
15 States in its Complaint:

16 **Dr. Kira Stein** is a volunteer clinical faculty member at UCLA’s David
17 Geffen School of Medicine who founded the Jewish Faculty Resilience Group. Dr.
18 Stein reported the “Depathologizing Resistance” lecture to UCLA administrators
19 before and after it occurred, warning that its content was antisemitic. Dr. Stein was
20 subsequently suspended from teaching after being falsely accused of “doxxing”
21 residents for recording the lecture. Despite the lecture being acknowledged as
22 antisemitic by department leadership, Dr. Stein remains suspended while those who
23 delivered the antisemitic content faced no discipline. On June 25, 2025, the EEOC
24 found reasonable cause to believe UCLA subjected Dr. Stein to an unlawful hostile
25 work environment and different terms and conditions of employment based on her
26 Jewish identity. Intervenor Plaintiff Dr. Stein incorporates by reference Exhibit 1,
27 ¶¶ 202-265.
28

1 **Dr. Vivien Burt** is a professor emeritus at UCLA’s David Geffen School of
2 Medicine and founder of The Women’s Life Center. Dr. Burt was subjected to a
3 professional boycott by medical residents who refused to receive instruction from
4 her because she is a “Zionist.” She was denied entry to the UCLA Encampment
5 because she is Jewish. Her professional responsibilities were reduced, she was
6 subjected to monitoring requirements, and she was no longer permitted to have
7 unsupervised communication with residents. In light of UCLA’s failure to address
8 the antisemitism directed at her, Dr. Burt was constructively discharged and took a
9 leave of absence in June 2024. On May 23, 2025, the EEOC found reasonable
10 cause to believe UCLA subjected Dr. Burt to an unlawful hostile work environment
11 based on her Jewish identity. Intervenor Plaintiff Dr. Burt incorporates by reference
12 Exhibit 1, ¶¶ 266-312.

13 **Dr. Nir Hoftman** is a clinical professor at UCLA’s David Geffen School of
14 Medicine who has witnessed and experienced numerous instances of antisemitism,
15 including being physically assaulted at the Encampment. When he reported
16 antisemitic conduct, he was accused by UCLA leadership of being the reason why
17 prospective Jewish medical students were having less interest in attending the
18 medical school. On May 23, 2025, the EEOC found reasonable cause to believe
19 UCLA subjected Dr. Hoftman to an unlawful hostile work environment based on
20 his Jewish identity. Intervenor Plaintiff Dr. Hoftman incorporates by reference
21 Exhibit 1, ¶¶ 313-362.

22 **Dr. Kamran Shamsa**, a representative party already named in the United
23 States’ Complaint, is associate clinical professor within the Medical Department,
24 Cardiology Division at UCLA. Professor Shamsa experienced antisemitism when
25 he was physically assaulted near the Spring 2024 UCLA encampment while nearby
26 UCLA security guards failed to intervene. Later he was pushed again by a guard
27 despite showing his faculty badge. Subsequently, Professor Shamsa experienced
28 retaliation by UCLA when he was denied a promotion for a leadership role he had

1 already been performing; effectively, leaving him the only doctor without a
2 director-level position and paid significantly less than his peers. On May 23, 2025,
3 the EEOC found reasonable cause to believe UCLA subjected Professor Shamsa to
4 an unlawful hostile work environment, denial of promotion, and different terms and
5 conditions of employment based on his Jewish identity, as well as retaliation for
6 complaining of discrimination. Intervenor Plaintiff Dr. Shamsa incorporates by
7 reference Exhibit 1, ¶¶ 363-397.

8 **Dr. Ian Holloway**, a representative party already named in the United States’
9 Complaint, is a tenured professor formerly at UCLA’s Luskin School of Public
10 Affairs who later transferred to the School of Nursing. After signing the “UCLA
11 Faculty Against Terror” letter, Dr. Holloway was targeted with harassing messages
12 on his classroom chalkboard and received negative course evaluations specific to
13 Israel despite his classes not involving any discussion of Israel. He was told by a
14 colleague that as a “white-privileged male” he did not have a right to complain
15 about antisemitism. The hostile environment and retaliation forced Dr. Holloway to
16 transfer departments, resulting in pay cuts, loss of research funding, and ultimately
17 medical leave. On May 23, 2025, the EEOC found reasonable cause to believe
18 UCLA subjected Dr. Holloway to an unlawful hostile work environment and
19 retaliation based on his Jewish identity. Intervenor Plaintiff Dr. Holloway
20 incorporates by reference Exhibit 1, ¶¶ 398-448.

21 **Director Sarah Blenner** is the Director of Field Studies and Applied
22 Professional Training in the Department of Community Health Sciences. Director
23 Blenner was denied a position for which she was recruited shortly after October 7,
24 2023, despite being more qualified than the candidate who received it.
25 After traveling to Israel with UCLA approval, she was required by her Department
26 Chair to send a letter to students assuring them she would not discriminate against
27 them. She was subjected to progressive discipline and pervasive micromanagement,
28 including having her teaching responsibilities reduced and being denied a

1 promotion. On May 23, 2025, the EEOC found reasonable cause to believe UCLA
2 subjected Director Blenner to an unlawful hostile work environment based on her
3 Jewish identity. Intervenor Plaintiff Director Blenner incorporates by reference
4 Exhibit 1, ¶¶ 449-520.

5 **Dr. Ron Avi Astor** is a tenured professor at the Luskin School of Public
6 Affairs. After signing the “UCLA Faculty Against Terror” letter, Dr. Astor was
7 subjected to classroom vandalism, defamatory accusations of supporting genocide,
8 student boycotts of his events, and a course cancellation. His research activities
9 have been directly impacted: protesters disrupted his research presentation while
10 UCLA failed to enforce its policies. UCLA denied a donor’s request that monies be
11 used for Dr. Astor’s proposed Jewish-related research and instead redirected the
12 funds to other projects. On May 23, 2025, EEOC found reasonable cause to believe
13 UCLA subjected Dr. Astor to an unlawful hostile work environment and retaliation
14 based on his Jewish identity. Intervenor Plaintiff Dr. Astor incorporates by
15 reference Exhibit 1, ¶¶ 521-584.

16 **C. Intervenor Plaintiffs Have Exhausted Their Administrative Remedies**

17 Intervenor Plaintiffs timely filed charges of discrimination with the Equal
18 Employment Opportunity Commission. *See* Exhibits A-G (attached to Exhibit 1).
19 The EEOC made reasonable cause determinations in their favor, and thereafter
20 completed conciliation as required by 42 U.S.C. § 2000e-5(b). *See id.*

21 On March 11, 2026, Intervenor Plaintiffs Dr. Stein, Dr. Burt, Dr. Hoftman,
22 Dr. Astor, and Director Blenner were issued right-to-sue letters pursuant to 42
23 U.S.C. § 2000e-5(f)(1), giving them 90 days from that date to file suit. *See* Exhibits
24 2-6. Additionally, because Dr. Holloway and Dr. Shamsa were named plaintiffs in
25 the United States’ Complaint, right-to-sue letters were not required as to them. *See*
26 42 U.S.C. § 2000e-5(f)(1) (right-to-sue letters are unnecessary when the Attorney
27
28

1 General has filed a civil action against a governmental entity on behalf of an
2 aggrieved person).¹

3 **III. ARGUMENT**

4 Parties may intervene in a lawsuit as a matter of right or with the permission
5 of the Court under Rule 24 of the Federal Rules of Civil Procedure. “Rule 24(a) is
6 construed broadly, in favor of the applicants for intervention.” *In re Volkswagen*
7 *“Clean Diesel” Mktg., Sales Practices, & Prods. Liability Litig.*, 894 F.3d 1030,
8 1037 (9th Cir. 2018).

9 **A. Intervenor Plaintiffs Are Entitled to Intervene as a Matter of**
10 **Right Under Federal Statute**

11 Rule 24(a) of the Federal Rules of Civil Procedure permits intervention as of
12 right “on a timely motion,” and when the intervenor “is given an unconditional right
13 to intervene by a federal statute...” Fed. R. Civ. P. 24(a)(1). Here, Title VII
14 expressly provides aggrieved employees the right to intervene in civil actions
15 brought by the EEOC or the United States. 42 U.S.C. § 2000e-5(f)(1) (“[T]he person
16 or persons aggrieved shall have the right to intervene in a civil action brought by
17 the [EEOC]...”). The United States Supreme Court has made clear that aggrieved
18 individuals have the statutory right to intervene in cases in which the EEOC or the
19 United States has filed a Complaint against the individuals’ employer for violations
20 of Title VII. *General Telephone Co. v. EEOC*, 446 U.S. 318, 326 (1979); *see also*
21 *E.E.O.C. v. Giumarra Vineyards Corp.*, No. 1:09-CV-02255-OWW, 2010 WL
22

23 ¹ The 90-day deadline to bring an action under 42 U.S.C. § 2000e-5(f)(1) falls on June 9,
24 2026. Intervenor Plaintiffs’ timely filing of this Motion to Intervene, accompanied by their
25 proposed Complaint (Exhibit 1), satisfies this 90-day statutory requirement to commence
26 an action. *See Jack v. Travelers Ins. Co.*, 22 F.R.D. 318, 320 (E.D. Mich. 1958), *aff’d*, 277
27 F.2d 736 (6th Cir. 1960); *see also Valenzuela v. Kraft, Inc.*, 801 F.2d 1170, 1172-74 (9th
28 Cir. 1986) (holding the 90-day deadline is not a jurisdictional prerequisite, but rather
subject to equitable tolling). Intervenor Plaintiffs preserve their right to file a separate
action before the expiration of the 90-day deadline, if necessary, to protect their statutory
rights.

1 3220387, at *6 (E.D. Cal. 2010) (stating that aggrieved persons have an
2 “unconditional right to intervene” in a Title VII enforcement action); *E.E.O.C. v.*
3 *University of Phoenix, Inc.*, No.06-2303-PHX-MHM, 2008 WL 1971396 at *3 (D.
4 Ariz. 2008) (same).

5 To have standing as an aggrieved person an intervenor must show an injury
6 and the “interest sought to be protected by the complainant is arguably within the
7 zone of interests to be protected or regulated by the statute.” *Foust v. Transamerica*
8 *Corp.*, 391 F. Supp. 312, 314 (N.D. Cal. 1975), citing *Data Processing Service v.*
9 *Camp*, 397 U.S. 150, 152-53 (1970). Thus, for the purpose of intervention under
10 Title VII, an “aggrieved person” is one who has either filed a charge with the EEOC,
11 or who alleges claims nearly identical to those of a party who has filed an EEOC
12 charge. See *EEOC v. GMRI, Inc.*, 221 F.R.D. 562, 563 n.4 (D. Kan. 2004).

13 Here, all Intervenor Plaintiffs are aggrieved parties who have filed charges
14 of discrimination with the EEOC and, with the exception of Drs. Holloway and
15 Shamsa, have received right-to-sue letters. See *supra* Section II, C. Further, Drs.
16 Holloway and Shamsa are already specifically named as representative aggrieved
17 parties in the United States’ Complaint. See *United States Complaint*, Counts II-V.
18 Additionally, the remaining Intervenor Plaintiffs, Drs. Astor, Stein, Burt, Hoftman,
19 and Director Blenner, allege claims that are identical or nearly identical to those in
20 the United States’ Complaint. Indeed, in their proposed Complaint (Exhibit 1,
21 attached), Intervenor Plaintiffs allege the same general facts as alleged in the
22 government’s Complaint — many of the facts are nearly identical — concerning
23 the discrimination and hostile work environment they have experienced at UCLA
24 based on their Jewish religion, Israeli national origin, and/or race, and either a lack
25 of response on behalf of UCLA or retaliation for complaining of discrimination to
26 the EEOC. See *United States Complaint*, Counts I & VI.

27 Thus, under Rule 24, because Intervenor Plaintiffs have a statutory right to
28 intervene, they must be permitted to intervene so long as their application is timely.

1 To determine whether a motion to intervene is timely, courts consider: (1) the stage
2 of the proceeding at which an applicant seeks to intervene; (2) the prejudice to other
3 parties; and (3) the reason for and length of the delay. *Unites States v. Alisal Water*
4 *Corp.*, 370 F.3d 915, 921 (9th Cir. 2004). Courts are generally more lenient in
5 considering these factors when intervention is sought as a matter of right. *United*
6 *States v. Oregon*, 745 F.2d 550, 552 (9th Cir. 1984). “Mere lapse of time alone is
7 not determinative.” *Id.*

8 Intervenor Plaintiffs’ motion is timely. This litigation is in its earliest stages.
9 The United States filed its Complaint on February 24, 2026. Intervenor Plaintiffs
10 are seeking to intervene only 49 days after the filing of the United States’
11 Complaint. No answer has been filed, no discovery has been propounded, no
12 scheduling order has been entered, and no trial date has been set. A motion to
13 intervene is timely when filed at such early stages. *See EEOC v. JCFB, Inc.*, No.
14 19-CV-00552-LHK, 2019 WL 2525203, at *21 (N.D. Cal. June 19, 2019) (finding
15 intervention timely when filed approximately three months after the filing of
16 complaint).

17 Further, there is no indication that any party would be prejudiced by granting
18 intervention. The court has not issued any substantive ruling. “When an application
19 for leave to intervene is filed, as is the case here, before the existing parties have
20 even joined the issues, the application is almost uniformly deemed timely.” *Kozak*
21 *v. Well*, 278 F.2d 102, 109 (8th Cir. 1960); *see also Day v. Apoliona*, 505 F.3d 963,
22 965 (9th Cir. 2007) (holding that intervention would not cause delay by adding new
23 issues but would simply ensure that an existing issue is not shielded from review
24 due to the parties’ posture). Because no discovery has been taken and both the
25 discovery cut-off and trial dates are still to be set, none of the existing parties will
26 be prejudiced by the Intervenor Plaintiffs’ entry into the litigation at this time.

27 Moreover, Intervenor Plaintiffs have been diligent, and have not delayed
28 filing this motion. Intervenor Plaintiffs filed this motion promptly upon learning of

1 the United States’ enforcement action and after receiving right-to-sue letters from
2 the EEOC. *See supra* Section II(C).

3 **B. Alternatively, Intervenor Plaintiffs Have a Right to Intervene Because**
4 **of an Impaired Interest**

5 Rule 24(a)(2) also permits intervention when a party shows an “impaired
6 interest.” The Ninth Circuit applies a four-part test in evaluating “interest-
7 impairment” intervention as a matter of right, requiring that an applicant
8 demonstrate: (1) the application for intervention is timely; (2) the applicant
9 possesses a “significantly protectable” interest in the subject matter of the action;
10 (3) without intervention the action may impair or impede the applicant’s ability to
11 protect that interest; and (4) the interest is inadequately represented by the existing
12 parties. *Southwest Ctr. for Biological Diversity v. Berg*, 268 F.3d 810, 817 (9th Cir.
13 2001). In determining whether interest-impairment intervention is appropriate, the
14 Ninth Circuit is guided primarily by practical and equitable considerations and
15 generally interprets the requirements broadly in favor of intervention. *Donnelly v.*
16 *Glickman*, 159 F.3d 405, 409 (9th Cir. 1998).

17 *i. Sufficient Interest*

18 Here, as noted above, *see supra*, Section III(A), Intervenor Plaintiffs’ motion
19 is timely; therefore, the next requirement under Rule 24(a)(2) is whether the
20 intervening party has a sufficient interest in the subject matter of the pending case.
21 Fed. R. Civ. P. 24(a)(2). “Whether an applicant for intervention demonstrates
22 sufficient interest in an action is a practical, threshold inquiry. No specific legal or
23 equitable interest need be established.” *Greene v. United States*, 996 F.2d 973, 975
24 (9th Cir. 1993); *see also Wineries of the Old Mission Peninsula Ass’n v. Twp. of*
25 *Peninsula*, 41 F.4th 767, 772 (6th Cir. 2022).

26 A party’s interest in addressing the unlawful employment practices of an
27 employer or a likelihood of being legally bound by the judgment in the pending
28 case, are cognizable interests for purposes of Rule 24(a)(2). *See Texas v. U.S.*, 805

1 F.3d 653, 658 (5th Cir. 2015); *City of Emeryville v. Robinson*, 621 F.3d 1251, 1259
2 (9th Cir. 2010); *Bridgeport Guardians, Inc. v. Delmonte*, 602 F.3d 469, 474 (2nd
3 Cir. 2010). Specific to the Ninth Circuit, an interest in the matter must be one that
4 is “significantly protectable” in the subject matter of the action. *Donnelly*, 159 F.3d
5 at 409. A prospective intervenor “has a ‘significant protectable interest’ in an action
6 if (1) it asserts an interest that is protected under some law, and (2) there is a
7 ‘relationship’ between its legally protected interest and the plaintiff’s claims.” *Id.*

8 Here, Intervenor Plaintiffs assert hostile work environment, discrimination
9 and retaliation claims that are covered by Title VII. These claims are directly
10 related, if not nearly identical to the United States’ claims in its Complaint. As a
11 result, adjudication of the United States’ Complaint, given the common questions
12 of law and fact with Intervenor Plaintiffs’ proposed complaint, would directly affect
13 the Intervenor Plaintiffs’ claims, and create a likelihood that Intervenor Plaintiffs
14 would be legally bound by the Court’s judgment in this case. This, of course, would
15 occur without Intervenor Plaintiffs having an opportunity to present their own
16 claims and requested remedies, such as their state law claims under FEHA, Cal.
17 Gov. Code §§ 12940 *et seq.*, which are not alleged in the United States’ Complaint.
18 Additionally, Intervenor Plaintiffs also hold a protectable interest in the outcome of
19 this case related to UCLA’s future employment practices—particularly as it relates
20 to antisemitism and discrimination against Jewish and Israeli employees.

21 *ii. Impairment of Interest*

22 The next factor under Rule 24(a)(2) is impairment of interest. As to this
23 factor, Intervenor Plaintiffs need only show that impairment of a substantial legal
24 interest is possible if intervention is denied, such as potential claim preclusion and
25 issue preclusion affecting their case. *U.S. v City of Los Angeles, Cal.*, 288 F.3d 391,
26 401 (9th Cir. 2002) (potential impairment is sufficient). And as noted in Rule
27 24(a)(2), a *practical* consequence of litigation may also cause sufficient risk of
28 impairment to the parties seeking to intervene. *See Fed. R. Civ. P. 24(a)(2)* (the

1 interest “is so situated that disposing of the action may as a practical matter impair
2 or impede the movant’s ability to protect its interest”).

3 Based on the common questions of law and fact between Intervenor Plaintiffs
4 and the United States’ Complaint, the potential for impairment is clear. It is highly
5 likely that Intervenor Plaintiffs will, in any parallel or subsequent proceeding, be
6 bound to this Court’s rulings and final judgment—all without being provided an
7 opportunity to present their claims and evidence in this case. Moreover, allowing
8 Intervenor Plaintiffs to intervene in this case serves both efficiency and access to
9 the courts; by permitting parties with a practical interest in the outcome to intervene,
10 courts often prevent or simplify future litigation involving related issues. *See*
11 *Greene*, 996 F.2d at 975.

12 *iii. Adequate Representation*

13 The last factor is whether there is adequate representation by the existing
14 parties. Fed. R. Civ. P. 24(a)(2). An intervenor need only demonstrate that
15 representation of their interests “may be” inadequate. *Trbovich v. United Mine*
16 *Workers*, 404 U.S. 528, 538 n.10 (1972). In conducting this analysis, the court is
17 required to compare the Intervenor Plaintiffs’ interests with the interests of the
18 existing parties. *Arakaki v. Cayetano*, 324 F.3d 1078, 1086 (9th Cir. 2003) (“The
19 most important factor in determining the adequacy of representation is how the
20 interest compares with the interests of existing parties.”). Critically, where the
21 intervenors’ interests are similar to, but not identical with, the existing party, a
22 presumption of adequate representation is typically improper. *See Berger v. North*
23 *Carolina State Conf. of the NAACP*, 597 U.S. 179, 195 (2022) (citing *Trbovich*, 404
24 U.S. at 538).

25 Here, because the United States may not adequately represent the interests of
26 Intervenor Plaintiffs, no presumption of adequate representation should apply.
27 While the Intervenor Plaintiffs and the United States share a common interest in
28 remedying antisemitic discrimination at UCLA, their interests may diverge in

1 critical respects. The United States’ lawsuit seeks to vindicate the rights of the
2 broader class of Jewish and Israeli faculty at the University. In contrast, each of the
3 Intervenor Plaintiffs have suffered distinct, individualized harms arising from their
4 unique circumstances, professional positions, and personal experiences with
5 discrimination. These particularized injuries—which include specific incidents of
6 harassment, hostile work environment conditions, and retaliatory conduct directed
7 at each individual—may not be adequately addressed by the United States.

8 Inadequate representation may also be shown when an existing party has a
9 greater incentive to compromise or settle a claim than the proposed intervenor.
10 *Tech. Training Assocs. v. Buccaneers Ltd. P’ship*, 874 F.3d 692, 697 (11th Cir.
11 2017). And here, because the United States represents a broader class of interests
12 than Intervenor Plaintiffs—all Jewish and Israeli faculty at UCLA—it must
13 necessarily pursue remedies designed to benefit the broadest possible class. The
14 United States acts not as a private advocate but as a representative of the United
15 States and the class of aggrieved persons at UCLA; as a result, its litigation strategy
16 and settlement posture must account for the broader public interest, and prioritize
17 the interests of that class over the remedies that may focus primarily on the
18 individualized claims and interests of Intervenor Plaintiffs.

19 Additionally, Intervenor Plaintiffs’ claims under California state law may
20 provide defenses, and permit remedies and damages that are not available under the
21 United States’ Complaint, which has only alleged Title VII claims. For example,
22 there is no cap on compensatory damages under FEHA, unlike under Title VII.
23 Compensatory damages for emotional distress under FEHA are not subject to a
24 fixed or absolute standard, and juries are afforded broad discretion to determine the
25 appropriate amount based on the evidence presented. *See Andrade v. Arby’s Rest.*
26 *Grp., Inc.*, 225 F. Supp. 3d 1115, 1141 (2016); *Kelley v. Fundomate, Inc.*, 773 F.
27 Supp. 3d 899, 930 (2025). The employee may also seek to recover non-economic
28 damages to compensate her for any emotional distress, mental anguish, pain,

1 suffering, or harm to her reputation that was caused by the employer’s misconduct.
2 *Fritsch v. City of Chula Vista*, 196 F.R.D. 562, 568 (S.D. Cal. 1999).

3 **C. Permissive Intervention By Intervenor Plaintiffs Is Also**
4 **Warranted**

5 Alternatively, if the court does not find statutory intervention as of right for
6 some or all of the Intervenor Plaintiffs, the court should allow permissive
7 intervention under Rule 24(b). A court may grant permissive intervention when a
8 timely motion shows that intervention is either 1) conditionally authorized by
9 statute or 2) the intervening party has a) an independent ground for jurisdiction, b)
10 a timely motion, c) and a common question of law or fact. Fed. R. Civ. P. 24(b);
11 *see also Donnelly*, 159 F.3d at 412; *Flynt v. Lombardi*, 782 F3d 963, 966 (8th Cir.
12 2015).

13 Here, because federal statute provides aggrieved employees an unconditional
14 statutory right to intervene (42 U.S.C. § 2000e-5(f)(1)), this Court need not analyze
15 whether permissive intervention is conditionally authorized by statute.
16 Additionally, as discussed above, *see supra*, Section III(A), Intervenor Plaintiffs’
17 motion is timely. Thus, the relevant inquiry for permissive intervention is whether
18 the Intervenor Plaintiffs satisfy Rule 24(b)’s remaining two requirements—an
19 independent ground for jurisdiction and common questions of law or fact.

20 Intervenor Plaintiffs clearly have an independent basis for subject-matter
21 jurisdiction because their claims involve a Federal question. Specifically, the claims
22 raised in Intervenor Plaintiffs’ proposed complaint include Title VII claims which
23 are federal causes of action. Additionally, their state claims are directly related and
24 virtually mirror the federal claims and are therefore part of the same “case or
25 controversy” as the federal law claims. It follows, therefore, that this Court has
26 subject matter jurisdiction over the state claims under its supplemental jurisdiction.
27 *Kohler v. Inter-Tel Techs.*, 244 F.3d 1167, 1170 (9th Cir. 2001) (holding
28

1 supplemental jurisdiction proper where federal and FEHA claims arose from the
2 same nucleus of operative facts).

3 Finally, Intervenor Plaintiffs’ proposed complaint shares common question
4 of law and fact with the United States’ Complaint in the pending litigation. Fed. R.
5 Civ. P. 24(b); *See Donnelly*, 159 F.3d at 412. Both actions arise from an alleged
6 pattern of antisemitic harassment and discrimination at UCLA following October
7 7, 2023, and both allege violations of Title VII premised on hostile work
8 environment, disparate treatment, and retaliation against Jewish and Israeli
9 employees. The factual questions are materially identical: whether UCLA failed to
10 prevent and correct pervasive antisemitic conduct, whether Jewish employees were
11 subjected to harassment based on their race, religion, and national origin, whether
12 UCLA maintained inadequate complaint procedures, and whether the university
13 retaliated against employees who complained. The United States specifically
14 alleges that UCLA's standard procedure was to prematurely close antisemitism
15 complaints without adequate investigation, and the proposed intervenors' complaint
16 details precisely how each plaintiff experienced this same treatment. Moreover,
17 proposed intervenors Drs. Holloway and Shamsa are named charging parties in the
18 United States’ Complaint, creating direct factual overlap. The evidentiary record
19 will also necessarily include the same documents—UCLA’s Anti-Discrimination
20 Policy, EEOC Letters of Determination, the Antisemitism Task Force Report, and
21 complaint records—demonstrating that resolution of the Intervenor Plaintiffs’
22 claims is inherently intertwined with resolution of the United States’ claims.

23 The legal questions are equally parallel. Both complaints require the Court to
24 determine whether UCLA created an unlawful hostile work environment under
25 Title VII by tolerating antisemitic harassment sufficiently severe or pervasive to
26 alter the conditions of employment, and whether UCLA had actual or constructive
27 knowledge of the harassment yet failed to take prompt and effective remedial
28 action. Both also allege retaliation under Title VII against employees who engaged

1 in protected activity, requiring application of the same legal framework. Because
2 both the facts and legal theories are shared, permitting intervention will promote
3 judicial economy and avoid inconsistent judgments. The Intervenor Plaintiffs’
4 claims arise from common, if not the same, questions of fact and law as the United
5 States’ Complaint, satisfying the requirements for permissive intervention under
6 Federal Rule of Civil Procedure 24(b).

7 Finally, in considering whether to grant permissive intervention, this Court
8 must examine whether intervention will unduly delay or prejudice the adjudication
9 of the rights of the original parties. Fed. R. Civ. P. 24(b)(3). As already discussed
10 above, Intervenor Plaintiffs’ Complaint is based on common facts and legal claims
11 as the United States’ Complaint. Additionally, intervention at this time would not
12 unduly delay or prejudice UCLA because it already has notice of Intervenor
13 Plaintiffs’ claims. Specifically, UCLA has been aware of Intervenor Plaintiffs’
14 complaints of discrimination and hostile work environment through their internal
15 complaints, and charges filed with the EEOC.

16 **CONCLUSION**

17 Intervenor Plaintiffs, as aggrieved individuals, are entitled to intervene in this
18 Title VII enforcement action under Fed. R. Civ. P. 24(a) as of right and,
19 alternatively, under Fed. R. Civ. P. 24(b) though permissive intervention. Thus, for
20 all the reasons set forth above, Intervenor Plaintiffs respectfully request that their
21 motion to intervene as plaintiffs in the instant action be granted. In accordance with
22 Rule 24(c), a pleading setting forth the claims for which intervention is sought—
23 the proposed Complaint—accompanies this motion.

Respectfully submitted this 14th day of April 2026.

By: /s/ John B. Thomas

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CERTIFICATE OF COMPLIANCE

The undersigned, counsel of record for proposed intervenor plaintiffs, certifies on this 14th day of April 2026, that this brief contains 4,999 words, which complies with the word limit of L.R. 11-6.1.

/s/ John B. Thomas

John B. Thomas
*Attorney for Prospective Intervenor
Plaintiffs*

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of April 2026, I caused the foregoing document to be electronically transmitted to the Clerk’s Office using the CM/ECF System for Filing, which will send notice of such filing to all registered CM/ECF users.

/s/ John B. Thomas

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13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**
15 **WESTERN DIVISION**

16 UNITED STATES OF AMERICA,

17 Plaintiff,

18 vs.

19 REGENTS OF THE UNIVERSITY OF
20 CALIFORNIA,

21 Defendant.

Case No.: 2:26-CV-01946

**DECLARATION OF ANDREW
W. GOULD (LOCAL RULE 7-3)**

Hearing Date: May 18, 2026
Hearing Time: 10:00 a.m.
Court: Judge Christina A. Snyder

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DECLARATION OF ANDREW W. GOULD (LOCAL RULE 7-3)

I, Andrew W. Gould, declare as follows:

1. I am an attorney at law, licensed to practice in the State of Arizona, and I am a Partner at Holtzman Vogel Baran Torchinsky & Josefiak, PLLC.
2. I am one of the attorneys that represents Prospective Intervenor Plaintiffs, Dr. Kira Stein, Dr. Vivien Burt, Dr. Nir Hoftman, Dr. Ian Holloway, Director Sarah Blenner, Dr. Kamran Shamsa, and Dr. Ron Avi Astor (collectively, “Intervenor Plaintiffs”).
3. This declaration is submitted in support of Intervenor Plaintiffs' Motion to Intervene as Plaintiffs in *United States of America v. The Regents of the University of California*, Case No. 2:26-cv-01946, pursuant to Federal Rules of Civil Procedure, Rule 24(a) and (b), 42 U.S.C. § 2000e-5(f)(1). Attached hereto as Exhibit 1 is the proposed Complaint in Intervention, setting forth the claims for which intervention is sought, as required by Fed. R. Civ. P. 24(c).
4. Pursuant to Local Rule 7-3, I certify that I participated in conferences with the parties’ counsel between April 1 and April 6, 2026, at least seven days before filing the Motion to Intervene.
5. The parties were unable to reach a resolution on this motion because a motion to intervene requires a judicial determination under Federal Rule of Civil Procedure 24. However, counsel for the United States advised that the United States does not oppose Intervenor Plaintiffs’ Motion, and counsel for the University of California indicated that the University of California could not take a position on the Motion at the time of our conference.

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I declare under penalty of perjury that the foregoing is true and correct.
Executed on April 13, 2026.

By:  _____

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EXHIBIT 1

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13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**
15 **WESTERN DIVISION**

16 KIRA STEIN; VIVIEN BURT; NIR
17 HOFTMAN; KAMRAN SHAMSA;
18 IAN HOLLOWAY, SARAH UZAN,
19 RON AVI ASTOR, individuals,
20 Plaintiffs,

21 v.

22 REGENTS OF THE UNIVERSITY OF
23 CALIFORNIA,
24 Defendants.

Case No: 2:26-cv-01946

- PLAINTIFFS' COMPLAINT FOR:**
- (1) HOSTILE WORK ENVIRONMENT (TITLE VII)**
 - (2) RETALIATION (TITLE VII)**
 - (3) DISPARATE TREATMENT (TITLE VII)**
 - (4) DISCRIMINATION (FEHA, CA GOV CODE § 12940(a))**
 - (5) HARASSMENT (FEHA, CA GOV CODE § 12940(j))**
 - (6) FAILURE TO PREVENT DISCRIMINATION (FEHA, CA GOV CODE § 12940(k))**
 - (7) RETALIATION (FEHA, CA GOV CODE § 12940(h))**

DEMAND FOR JURY TRIAL

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COMPLAINT

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1 Plaintiffs allege as follows:

2 **INTRODUCTION**

3 1. “In the year 2024, in the United States of America, in the State of
4 California, in the City of Los Angeles, Jewish students [and faculty] were excluded
5 from portions of the UCLA campus because they refused to denounce their faith.
6 This fact is so unimaginable and so abhorrent to our constitutional guarantee of
7 religious freedom that it bears repeating, *Jewish students [and faculty] were*
8 *excluded from portions of the UCLA campus because they refused to denounce their*
9 *faith. UCLA does not dispute this.” *Frankel v. Regents of the Univ. of Cal.*
10 (*“Frankel”*), 744 F. Supp. 3d 1015, 1020 (C.D. Cal. 2024) (italics in original) (order
11 granting motion for preliminary injunction).¹*

12 2. This is how another court in this District introduced the epidemic of
13 antisemitism that has spread across UCLA’s campus.

14 3. Following the horrific October 2023 terrorist attacks by the terrorist
15 group Hamas against Jewish *civilians*, in which innocent Jews, including infants
16 and elderly, were murdered, raped, and mutilated, those who harbored antisemitic
17 views suddenly felt emboldened to openly and boldly share them and create a
18 rampant anti-Jewish environment at UCLA.

19 4. In the wake of these events, UCLA should have taken steps to ensure
20 that its Jewish students, faculty, staff, and community members were protected from
21 harassment and undeterred in their access to everything UCLA has to offer,
22 including its facilities and employment. Indeed, UCLA has policies, practices, and
23 procedures in place to do so. But instead, UCLA officials routinely turned their
24 backs on its Jewish students, faculty, and staff, affirmatively contributing to a

25 _____
26 ¹ In July 2025, the *Frankel* case was settled after UCLA agreed to make permanent
27 the court’s order prohibiting the exclusion of Jewish faculty and students and to pay
28 over \$6 million in damages and fees. *Frankel v. Regents of the Univ. of Cal.*, Becket
Fund for Religious Liberty, <https://becketfund.org/case/frankel-v-regents-of-the-university-of-california/>.

1 UCLA-approved culture that has, among other antisemitic actions, allowed rampant
2 use of Nazi symbolism on campus and calls for *the annihilation of Jews*.

3 5. There are three inseparable and intersectional components of Jewish
4 identity: Am Yisrael (the people of Israel), Torat Yisrael (the Torah of Israel or
5 religious practices), and Eretz Yisrael (the land of Israel). Jewish individuals from
6 around the world are tied together through shared history, intergenerational trauma,
7 peoplehood, connection to their ancestral and indigenous land, and their traditions
8 and religion. Like Jewish communities around the world, Jewish faculty, staff, and
9 students at UCLA come from diverse backgrounds, reflecting the multiethnic and
10 multiracial composition of the Jewish people and the diverse expression of identity.

11 6. The origins of the Jewish people trace back thousands of years to the
12 ancient land of Israel, centered in Judea or Zion, where Jewish civilization, religion,
13 and national identity first developed. Following Babylonian and Roman conquest
14 and expulsion more than two thousand years ago, Jews were forced to scatter across
15 the world. This resulted in the Jewish Diaspora, where Jews live as minority
16 populations in every continent except for Antarctica.

17 7. Today, less than one percent (0.2%) of the global population is Jewish,
18 and roughly half of the global Jewish population resides in the United States
19 (representing approximately 1.7% of the national population).²

20 8. Jewish history includes repeated experiences of discrimination,
21 repression, persecution, expulsion, ethnic cleansing, and genocide under varied
22 political and ideological systems. These experiences include, but are not limited to:
23 Jewish massacres across Europe during the Black Death when Jews were falsely
24 accused of poisoning wells from 1348 to 1350; the Spanish Inquisition in 1492
25 when Jews were displaced, forced to convert, tortured, and killed; the Holocaust
26 from 1933 to 1945, in which the Nazi regime murdered six million Jews; the Farhud

27 _____
28 ² Pew Research Center, *Jewish Population Change* (June 9, 2025),
<https://www.pewresearch.org/religion/2025/06/09/jewish-population-change/>.

1 in Iraq in 1941 that resulted in pogroms and forced exile; and the Islamic Revolution
2 in 1979 which led to persecution and forced displacement.

3 9. Zionism is a religious, ethnic, and cultural belief that Jews constitute
4 one nation and, therefore, a state for the Jewish people—specifically in their
5 ancestral homeland of Israel—is a necessity. The promise of a home for the Jewish
6 people is foundational to the religious and cultural beliefs and practices of countless
7 people around the world.³

8 10. Antizionism, by contrast, is an ideology that treats the existence of
9 Israel as inherently illegitimate.⁴

10 11. Although the International Holocaust Remembrance Alliance’s
11 (“IHRA”) working definition of antisemitism does not include an explicit
12 independent definition of antizionism, it frames antizionism implicitly as an
13 example of antisemitism by listing “denying the Jewish people their right to self-
14 determination, e.g., by claiming that the existence of a state of Israel is a racist
15 endeavor.”⁵ Antizionist rhetoric and attacks against people who affirm the Jewish
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19 ³ See also Complaint and Jury Demand at 6 ¶ 21, *United States v. Regents of the*
20 *Univ. of Cal.*, No. 2:26-cv-01946, ECF No. 1 (C.D. Cal. Feb. 24, 2026).

21 ⁴ See International Holocaust Remembrance Alliance, *Working Definition of*
22 *Antisemitism* (May 26, 2016),
23 [https://www.holocaustremembrance.com/resources/working-definitions-](https://www.holocaustremembrance.com/resources/working-definitions-charters/working-definition-antisemitism)
24 [charters/working-definition-antisemitism](https://www.holocaustremembrance.com/resources/working-definitions-charters/working-definition-antisemitism); U.S. Dep’t of State, *Defining*
25 *Antisemitism*, <https://www.state.gov/defining-antisemitism/>; Cary Nelson, *Israel*
Denial: Anti-Zionism, Anti-Semitism, & the Faculty Campaign Against the Jewish
State (Indiana Univ. Press 2019); David Hirsh, *Contemporary Left Antisemitism*
(Routledge 2017).

26 ⁵ International Holocaust Remembrance Alliance, *Working Definition of*
27 *Antisemitism* (May 26, 2016),
28 [https://www.holocaustremembrance.com/resources/working-definitions-](https://www.holocaustremembrance.com/resources/working-definitions-charters/working-definition-antisemitism)
[charters/working-definition-antisemitism](https://www.holocaustremembrance.com/resources/working-definitions-charters/working-definition-antisemitism).

1 state's right to exist are often used as a pretext for antisemitism and discrimination
2 against Jews.⁶

3 12. In academic and institutional settings, antizionist narratives frequently
4 function not as political criticism but as a discriminatory ideology that targets and
5 stigmatizes Jews based on their shared peoplehood and ethnic, national, ancestral,
6 and religious identity. This, in turn, contributes to a hostile environment for Jewish
7 students and faculty. Universities have a responsibility to address such
8 discrimination within their institutions rather than dismissing it as political
9 expression.

10 13. Plaintiffs, all of whom are Jewish and hold Zionist beliefs as part of
11 their Jewish identity, were subjected by their employer, UCLA, to a pervasive
12 antisemitic environment marked by ethnic, racial, and religious harassment that
13 created an unlawful hostile work environment and denied Plaintiffs basic human
14 dignity and equal employment protections guaranteed under state and federal laws.

15 14. UCLA created and fostered an environment in which antizionism was
16 used to deny Jewish self-determination, portray Jewish identity as illegitimate or
17 harmful, justify exclusion and boycotts of Jewish faculty, and retaliate against
18 Plaintiffs for speaking out against antisemitism. Plaintiffs repeatedly reported this
19 discrimination and hostile work environment to UCLA administrators and
20 departmental leadership, including deans, assistant deans, associate deans,
21 department chairs, vice chancellors, chancellors, discrimination prevention offices,
22 human resources, and Regents of the University of California. Yet UCLA, and the
23 University of California, failed to take effective corrective action, and the
24 antisemitic conduct continued. In this setting, antizionist rhetoric and conduct
25 targeted Jews uniquely and collectively, transforming what UCLA dismissed as
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28 ⁶ *Supra* n.4.

1 political discourse into discrimination against Plaintiffs as Jews—a protected class
2 under federal and state laws.

3 15. UCLA created, fostered, tolerated and maintained an illegal hostile
4 work environment, subjected Plaintiffs to disparate treatment, and retaliated against
5 them because of their Jewish identity, in violation of Title VII of the Civil Rights
6 Act of 1964. In addition, UCLA subjected Plaintiffs to discrimination and
7 harassment, while failing to prevent such discrimination and harassment, and while
8 also retaliating against Plaintiffs, all in violation of the California Fair Employment
9 and Housing Act (“FEHA”), Cal. Gov. Code § 12940, *et seq.* The consequences of
10 UCLA’s acts and omissions have had a devastating effect on Plaintiffs, severely
11 damaging them economically, physically, and emotionally, and inflicting long-
12 lasting damage to Plaintiffs’ professional careers and physical as well as emotional
13 well-being.

14 **JURISDICTION AND VENUE**

15 16. This Court has federal question jurisdiction over Plaintiffs’ Title VII
16 claims in this action pursuant to 28 U.S.C. §§ 1331 and 1343 over Plaintiffs’ claims
17 arising under the Constitution and laws of the United States. The Court has
18 supplemental jurisdiction over Plaintiffs’ state law FEHA claims because they
19 “form part of the same case or controversy” 28 U.S.C. § 1367(a).

20 17. This Court has authority to issue the declaratory and injunctive relief
21 sought under 28 U.S.C. §§ 2201 and 2202.

22 18. Venue lies in this District under 28 U.S.C. § 1391(b), because (i) at
23 least one Defendant resides in the Central District of California and all Defendants
24 reside in the State of California, and (ii) “a substantial part of the events or
25 omissions giving rise to the claim occurred” in the Central District of California
26
27
28

PARTIES

I. Plaintiffs

19. Plaintiff Dr. Kira Stein is Jewish. She is an assistant clinical professor at UCLA’s David Geffen School of Medicine (“DGSOM”). Dr. Stein resides in Los Angeles, California, and resides in this Judicial District.

20. Plaintiff Dr. Vivien Burt is Jewish. She is a professor emeritus at UCLA’s DGSOM. Dr. Burt resides in this Judicial District.

21. Plaintiff Dr. Nir Hoftman is Jewish. He is a clinical professor at UCLA’s DGSOM. Dr. Hoftman resides in Los Angeles, California, and resides in this Judicial District.

22. Plaintiff Dr. Kamran Shamsa is Jewish. He is an associate clinical professor in UCLA’s DGSOM, Division of Cardiology. Dr. Shamsa resides in this Judicial District.

23. Plaintiff Dr. Ian Holloway is Jewish. He was a professor of social welfare at UCLA’s Luskin School of Public Affairs (“Luskin School”), and, as of January 1, 2025, is a professor at UCLA’s School of Nursing. He resides in this Judicial District.

24. Plaintiff Sarah Uzan⁷ is Jewish. Her academic appointment is Academic Administrator III in the Department of Community Health Sciences at the UCLA Fielding School of Public Health, and her working title is Director of Field Studies and Applied Professional Training. She resides in this Judicial District.

25. Plaintiff Dr. Ron Avi Astor is Jewish. He is a professor in the Luskin School. He resides in this Judicial District.

⁷ Her maiden name, which is how she is known professionally, is Sarah Blenner. Hereinafter, she will be referred to as Director Blenner throughout this Complaint.

1 **II. Defendants**

2 26. Defendant Regents of the University of California is a public agency
3 within the meaning of Cal. Gov’t Code § 7920.525(a) and is empowered under the
4 California Constitution, Article IX, Section 9, to administer the University of
5 California, including the University of California, Los Angeles. The Board of
6 Regents is the governing body for the University of California system and under
7 Article IX, Section 9, of the California Constitution has “full powers of organization
8 and government” The Board of Regents has its principal place of operation in
9 Oakland, California.

10 **FACTUAL BACKGROUND**

11 **I. UC AND UCLA ADMINISTRATION, POLICIES, & PROCEDURES**

12 27. The Regents of the University of California oversee the 10-campus
13 University of California system, which includes UCLA.

14 28. UCLA is one of the largest universities in California, with over 46,000
15 undergraduate and graduate students.

16 29. UCLA is located in the Westwood neighborhood of Los Angeles,
17 California, within this Judicial District.

18 30. UCLA’s campus is located on hundreds of acres of publicly owned
19 land, and as a general matter, it is open to the public.

20 ***Policies Governing Students & Faculty***

21 31. In its own Student Conduct Code, UCLA states that its policies exist
22 to “create and maintain a safe, supportive, and inclusive campus community that
23 engages students”⁸

24 32. UCLA has a policy governing public protests that includes time, place,
25 and manner restrictions.⁹

26 _____
27 ⁸ *Student Conduct Code*, UCLA Office of the Dean of Students,
<https://perma.cc/G6JD-E9TG>.

28 ⁹ *Your First Amendment Rights as a Student at UCLA*, at 3, UCLA Student Affairs,

1 33. The time, place, and manner restrictions state that “speech and
2 assembly on university grounds . . . must not interfere with the orderly operation of
3 the campus and must be conducted in a manner that reasonably protects others from
4 becoming involuntary audiences.”¹⁰

5 34. The policy further prohibits “block[ing] entrances to or otherwise
6 interfer[ing] with the free flow of traffic into and out of campus buildings;”
7 “knowingly and willfully interfer[ing] with the peaceful conduct of the activities of
8 the campus or any campus facility by intimidating, harassing, or obstructing any
9 University employee, student, or any other person having lawful business with the
10 University;” and “camp[ing] or lodg[ing], except in authorized facilities or
11 locations.”¹¹

12 35. UCLA also has a Faculty Code of Conduct.¹²

13 36. Regarding teaching and students, it states:

14 The integrity of the faculty-student relationship is the foundation of the
15 University’s educational mission. This relationship vests considerable
16 trust in the faculty member, who, in turn, bears authority and
17 accountability as mentor, educator, and evaluator. The unequal
18 institutional power inherent in this relationship heightens the
19 vulnerability of the student and the potential for coercion. *The*
20 *pedagogical relationship between faculty member and student must be*
21 *protected from influences or activities that can interfere with learning*
22 *consistent with the goals and ideals of the University.*

23 <https://perma.cc/FP2Z-8NWC>.

24 ¹⁰ *Id.*

25 ¹¹ *UCLA Regulations on Activities, Registered Campus Organizations, and Use of*
26 *Properties*, 7–8 (Sept. 25, 2017), [https://sole.ucla.edu/file/4efd2db6-2863-447e-](https://sole.ucla.edu/file/4efd2db6-2863-447e-acb3-ca109fa5b33c)
[acb3-ca109fa5b33c](https://sole.ucla.edu/file/4efd2db6-2863-447e-acb3-ca109fa5b33c).

27 ¹² Univ. of Cal., Academic Personnel Manual (APM) - 015: *The Faculty Code of*
28 *Conduct* (rev. Jan. 29, 2026), [https://www.ucop.edu/academic-personnel-](https://www.ucop.edu/academic-personnel-programs/_files/apm/apm-015.pdf)
[programs/_files/apm/apm-015.pdf](https://www.ucop.edu/academic-personnel-programs/_files/apm/apm-015.pdf).

1 (Emphasis added).¹³

2 37. The Faculty Code of Conduct features a list of what is considered
3 inappropriate conduct by a faculty member towards students, including “significant
4 intrusion of material unrelated to the course,” and “[u]se of the position or powers
5 of a faculty member to coerce the judgment or conscience of a student or to cause
6 harm to a student for arbitrary or personal reasons.”¹⁴

7 38. In another section, the Faculty Code of Conduct states what is
8 considered inappropriate conduct by a faculty member towards the UCLA
9 community more generally, including, but not limited to, the following:

- 10 a. Intentional disruption of functions or activities sponsored or
11 authorized by the University.
- 12 b. Incitement of others to disobey University rules when such
13 incitement constitutes a clear and present danger that violence or
14 abuse against persons or property will occur or that the
15 University’s central functions will be significantly impaired.
- 16 c. Unauthorized use of University resources or facilities on a
17 significant scale for personal, commercial, political, or religious
18 purposes.
- 19 d. Discrimination, including harassment, against University
20 employees or individuals seeking employment . . . for reasons of
21 race, color, religion, sex, sexual orientation, gender, gender
22 expression, gender identity, ethnic origin, national origin,
23 ancestry, marital status, pregnancy, physical or mental disability,
24 medical condition (cancer-related or genetic characteristics),
25 genetic information (including family medical history), or
26

27 _____
28 ¹³ *Id.* at 4.

¹⁴ *Id.* at 5.

1 service in the uniformed services¹⁵

2 39. With respect to faculty conduct towards the UCLA community, the
3 Faculty Code of Conduct states that when faculty “act or speak in their personal
4 and private capacities, they should avoid deliberately creating the impression that
5 they represent the University.”¹⁶ Such prohibited behavior by a faculty member
6 includes “[i]ntentional misrepresentation of personal views as a statement of
7 position of the University or any of its agencies.”¹⁷

8 40. Similarly, UC Regents Policy 4408 on “Public and Discretionary
9 Statements by Academic Units” requires “[a]ll [p]ublic [s]tatements made by
10 Academic Campus Units” to “comply with applicable laws and University policies,
11 including” those governing anti-violence, anti-discrimination, anti-harassment, and
12 the Faculty Code of Conduct.¹⁸ “Academic Campus Units” include “officially
13 recognized University academic departments or divisions” and “other official
14 academic University entities, including schools, centers, laboratories, institutes,
15 campus divisions of the Academic Senate, and campus University Extension
16 units.”¹⁹

17 41. Additionally, the Faculty Code of Conduct details improper conduct
18 by a faculty member towards another colleague that includes, but is not limited to,
19 the following:

- 20 a. Making evaluations of the professional competence of faculty
21 members by criteria not directly reflective of professional
22 performance.

23
24 ¹⁵ *Id.* at 6–7.

25 ¹⁶ *Id.* at 8 (quoting U.C. Academic Council Statement, 1971).

26 ¹⁷ *Id.*

27 ¹⁸ Regents Policy 4408: Policy on Public and Discretionary Statements by Academic
Units, <https://regents.universityofcalifornia.edu/governance/policies/4408.html>
(effective July 18, 2024).

28 ¹⁹ *Id.*

1 b. Discrimination, including harassment, against faculty on
2 political grounds, or for reasons of race, color, religion, sex,
3 sexual orientation, gender, gender expression, gender identity,
4 ethnic origin, national origin, ancestry, marital status, pregnancy,
5 physical or mental disability, medical condition (cancer- related
6 or genetic characteristics), genetic information (including family
7 medical history), or service in the uniformed services²⁰

8 42. Regarding faculty enforcement and discipline, the Faculty Code of
9 Conduct recommends that each Division of the Assembly of the Academic Senate
10 “develop and periodically re-examine procedures dealing with the investigation of
11 allegations of faculty misconduct and the conduct of disciplinary proceedings.”²¹

12 43. In doing so, each Division must adhere to certain principles as stated
13 in the Faculty Code of Conduct, including, but not limited to, the following:

14 The procedures adopted shall include designation of the following
15 disciplinary sanctions authorized in the University Policy on Faculty
16 Conduct and the Administration of Discipline, of which this Faculty
17 Code of Conduct is an integral part: written censure, reduction in salary,
18 demotion, suspension, denial or curtailment of emeritus status, and
19 dismissal from the employ of the University. The Hearing Committee
20 shall not recommend the imposition of a sanction more severe than that
21 in the notice of proposed disciplinary action. More than one disciplinary
22 sanction may be imposed for a single act of misconduct, e.g., a letter of
23 censure and a suspension.²²

24 ***Abusive Conduct in the Workplace Policy***

25 44. The University of California maintains a systemwide policy

26 _____
27 ²⁰ *The Faculty Code of Conduct*, APM - 015 at 8.

28 ²¹ *Id.* at 9.

²² *Id.* at 10.

1 addressing abusive conduct in the workplace that “applies to all University
2 employees, unpaid interns, and third parties” across all campuses, medical centers,
3 laboratories, and affiliated units of the University.²³

4 45. The policy prohibits abusive conduct in the workplace and requires the
5 University to respond promptly to reports of such conduct and to take “appropriate
6 action to stop, prevent, correct, [or] discipline [conduct] that violates th[e] policy.”²⁴

7 46. The policy operates alongside existing personnel and disciplinary
8 processes and does not supplant the disciplinary procedures established in the
9 Academic Personnel Manual (*see infra* ¶¶ 53–56) or other applicable University
10 regulations.²⁵

11 47. The policy defines “Abusive Conduct” as “harassing or threatening
12 behavior that is sufficiently severe, persistent, or pervasive conduct in the
13 [w]orkplace t[o] den[y], adversely limit[], or interfere[] with a person’s
14 participation in or benefit from the [University’s] education, employment, or other
15 programs or activities”²⁶

16 48. The policy further explains that abusive “conduct creates an
17 environment . . . that a reasonable person would find to be intimidating or offensive
18 and unrelated to the University’s legitimate educational, employment, and business
19 interests.”²⁷

20 49. In determining whether conduct rises to this level, the University
21 evaluates “the totality of the circumstances,” including the relationship between the
22 parties and any power imbalance, the frequency, nature, and severity of the conduct,
23 “whether the conduct was physically threatening,” and whether the conduct may

24 _____
25 ²³ Univ. of Cal., *Abusive Conduct in the Workplace*, 1 (effective June 23, 2025),
<https://policy.ucop.edu/doc/4000701/AbusiveConduct>.

26 ²⁴ *Id.* at 2.

27 ²⁵ *Id.* at 3.

28 ²⁶ *Id.* at 2.

²⁷ *Id.*

1 implicate academic freedom or protected speech.²⁸

2 50. Under the policy, a single act may constitute abusive conduct if it is
3 particularly severe or egregious.²⁹

4 51. The policy further requires the University to respond promptly to
5 allegations of abusive conduct and directs each University location to adopt
6 implementing procedures identifying responsible reporting and investigative
7 offices, mechanisms for tracking complaints, and available resolution processes.³⁰

8 52. Under the policy, when a report of abusive conduct alleges facts that
9 may also constitute discrimination, harassment, sexual violence, or retaliation under
10 the University's Anti-Discrimination policy, the matter must be forwarded to the
11 appropriate compliance office, including the Title IX Office or Local
12 Implementation Officer, for coordination with the applicable investigative
13 procedures.³¹

14 *Academic Personnel Manual*

15 53. Individuals who are academic appointees not covered by UCLA's
16 Faculty Code of Conduct must abide by the Academic Personnel Manual ("APM"),
17 which establishes the governing framework for non-Senate academic appointees
18 and provides both procedural protections and substantive rights in matters involving
19 discrimination, harassment, retaliation, and adverse employment actions.³²

20 54. The University's APM policy prohibits discrimination against and
21 harassment of University employees on the basis of protected characteristics
22 including race, religion, ethnic origin, national origin, ancestry, among others.³³

23
24 ²⁸ *Id.*

25 ²⁹ *Id.*

26 ³⁰ *Id.*, § V.

27 ³¹ *Id.*, § V(C)(4).

28 ³² Univ. of Cal., APM, <https://www.ucop.edu/academic-personnel-programs/academic-personnel-policy/index.html>

³³ *The Faculty Code of Conduct*, APM - 015, II.C.5, II.D.2 (Jan. 29, 2026).

1 55. When the University receives a “grievance that raises allegations of
2 discrimination, harassment, or retaliation in violation of APM” section 035
3 involving affirmative action and nondiscrimination in employment, the grievance
4 must be forwarded to the appropriate campus compliance office, and the campus
5 must coordinate the grievance with relevant compliance offices including Title IX,
6 Title VII, ADA, and Equal Employment.³⁴

7 56. As part of UCLA’s shared governance model, each school and
8 department has their own bylaws, which govern procedures on voting and review
9 of dossiers, providing details of how the APM and Senate Faculty policies are
10 implemented. Department bylaws vary widely by school and Department.³⁵

11 ***Discrimination Prevention Office Procedures***

12 57. In addition to the APM, UCLA has adopted procedures administered
13 by the Discrimination Prevention Office (“DPO”), titled Procedures for Handling
14 Allegations of Discrimination, Harassment, or Retaliation, which govern the
15 University’s response to complaints of prohibited conduct.³⁶

16 58. The DPO has jurisdiction over complaints alleging discrimination,
17 harassment, or retaliation when the respondent is a faculty member.³⁷

18 59. The DPO procedures define discrimination as conduct that adversely
19 affects employment, admission, or access to University programs on the basis of
20 protected characteristics; define harassment as unwelcome verbal, nonverbal, or
21 physical conduct based on protected categories that is sufficiently severe, pervasive,
22 or persistent to create an intimidating, hostile, abusive, or offensive environment;

23 ³⁴ Univ. of Cal., APM - 140-32(e), https://www.ucop.edu/academic-personnel-programs/_files/apm/apm-140.pdf.

24 ³⁵ See UCLA Academic Senate, *School, Department, IDP, and CII Bylaws*,
25 <https://senate.ucla.edu/content/department-bylaws>

26 ³⁶ UCLA, DPO & Title IX Office, *Procedures for Handling Allegations of*
27 *Discrimination, Harassment, or Retaliation*, § II (Version 3.1 Aug. 8, 2019)
28 <https://sexualharassment.ucla.edu/file/e133993a-1eed-4512-b4a9-2d46aba5fb9a>.

³⁷ *Id.*

1 and prohibit retaliation against persons who report, assist with, or participate in
2 investigations or resolutions of such complaints.³⁸

3 60. The DPO procedures also encourage prompt reporting, impose
4 mandatory reporting obligations on supervisors, and require the responding office
5 to conduct an Initial Assessment to clarify allegations, “determine whether the
6 report plausibly alleges an act of Prohibited Conduct,” and decide whether the
7 matter should proceed to alternative resolution or formal investigation.³⁹

8 61. If a formal investigation is opened, the respondent must receive a
9 written Notice of Investigation summarizing the allegations, identifying potential
10 policy violations, describing the purpose and procedures of the investigation,
11 providing the expected timeline, and stating that the matter will be decided under a
12 preponderance of the evidence standard.⁴⁰

13 62. During the investigation, the investigator is tasked with interviewing
14 the parties and witnesses, reviewing documents and electronic communications,
15 and providing both parties an equal opportunity to submit information and identify
16 witnesses, and may obtain administrative and personnel records subject to
17 confidentiality requirements.⁴¹

18 63. The DPO procedures also permit, in the course of an investigation,
19 consideration of prior or subsequent conduct relevant to “pattern, knowledge, intent,
20 motive, or absence of mistake.”⁴²

21 64. The investigation culminates in a written Investigation Report
22 summarizing the allegations, applicable policies, evidence reviewed, factual
23 findings, credibility determinations, and conclusions regarding whether a policy
24

25 ³⁸ *Id.* § III(1), (2), (5).

26 ³⁹ *Id.* §§ VII(A), VIII(B).

27 ⁴⁰ *Id.* § IX(B)(2).

28 ⁴¹ *Id.* § IX(B)(4)(a), (c).

⁴² *Id.* § IX(B)(4)(d).

1 violation occurred under the preponderance standard.⁴³ Both parties must be
2 provided “a reasonable opportunity to respond to any material allegations or
3 evidence” before the Investigation Report is finalized.⁴⁴

4 65. The DPO procedures also impose timing, notice, and decision-making
5 requirements. “For non-Senate academic appointees, following consultation with
6 the [committee], and in accordance with APM-150, the Chancellor or Chancellor’s
7 designee” determines what action to take and must “promptly inform the parties”
8 of the final decision and its rationale and report the outcome and any corrective
9 action to the appropriate compliance office.⁴⁵

10 **II. ANTISEMITIC INCIDENTS ACROSS UCLA**

11 *Antisemitic Protests Post-October 7*

12 66. On October 7, 2023, the terrorist group Hamas launched a vicious and
13 deadly attack against Israel, in which Israeli civilians were beheaded, raped,
14 butchered, burned alive, and kidnapped.

15 67. In the wake of this horrible event, antisemitic protests erupted across
16 the country, frequently on college campuses. One of the themes of these protests is
17 antizionism. Distinguishable from criticism of Israeli government policy,
18 antizionism is an ideology that treats the existence of Israel—and often Jewish
19 collective existence itself—as an inherent crime. *See supra* n.4. Antizionism and
20 attacks against people who affirm the Jewish state’s right to exist are often used as
21 a pretext for antisemitism and thinly-disguised hatred and discrimination against
22 Jews. *Id.*

23 68. In practice, antizionism often operates as a stand-in for anti-Jewish
24 hostility, using the term “Zionist” as a derogatory label for Jews or those perceived
25 as Jewish or associated with Israel. Such rhetoric commonly relies on longstanding

26 _____
27 ⁴³ *Id.* § IX(B)(5).

28 ⁴⁴ *Id.*

⁴⁵ *Id.*, app. B at 23.

1 antisemitic tropes to stigmatize or target individuals. When people are excluded,
2 harassed, or subjected to adverse treatment on this basis, the conduct constitutes
3 discrimination on the grounds of religion, ethnicity, and/or national origin. *See*
4 *supra* n.4.

5 69. Even former Chancellor Gene Block admitted that UCLA has not been
6 “immune to the disturbing rise of antisemitism across our country since October
7 7th.”⁴⁶

8 70. In fact, UCLA was the site of one of the main and more infamous
9 antisemitic demonstrations.

10 71. Specifically, as early as October 12, 2023, demonstrators and activists
11 on UCLA’s campus chanted “*Itbah El Yahud*,” which means “slaughter the Jews”
12 in Arabic.

13 72. Police officers from the University of California Los Angeles Police
14 Department (“UCLA PD”) were present but did not intervene.

15 73. In or around early November 2023, UCLA faculty and professors,
16 including Dr. Stein, Dr. Burt, Dr. Hoftman, Dr. Holloway, Dr. Astor, and Director
17 Blenner, signed the UCLA Faculty Against Terror letter, also known as the “Judea
18 Pearl letter.”⁴⁷ *See infra* ¶¶ 407, 455, 530. This letter, covered in the Jewish Journal,
19 notified the UCLA Chancellor that campus rallies celebrating the October 7th
20 terrorist attack were calling for violence and made Jewish students, staff, and faculty
21 “afraid to be on campus, show solidarity with Israel, or practice their freedom of
22

23 ⁴⁶ House Comm. on Educ. & the Workforce, *Calling for Accountability: Stopping*
24 *Antisemitic College Chaos Before the H. Comm. on Educ. & the Workforce*, 118th
25 Cong. at 41:10–41:17, YouTube (May 23, 2024), <https://bit.ly/3R8V3FD> (statement
of Chancellor Block).

26 ⁴⁷ Judea Pearl is an Israeli born UCLA computer science professor and president of
27 the Daniel Pearl Foundation, recognized for his work promoting cross-cultural
28 understanding and for honoring the legacy of his son, journalist Daniel Pearl. Daniel
Pearl was abducted and beheaded by a Pakistani militant group in 2002.

1 religion in public.”⁴⁸

2 74. The Judea Pearl letter asked the administration to denounce Hamas’s
3 attack on Israel and rallies on campus that called for violence, characterized Hamas
4 as a terrorist organization, and to enforce UCLA policies to hold student groups and
5 the UCLA community accountable if they participate in inciting violence, and to
6 designate a special envoy to coordinate fighting antisemitism and anti-Israelism.

7 75. On November 8, 2023, agitators at UCLA’s School of Law held
8 antisemitic signs and chanted “from the River to the Sea,”⁴⁹ “there’s only one
9 solution,” “*intifada*,” “death to Israel,” and “death to Jews.”

10 76. At this same protest, the UCLA student group “Students for Justice in
11 Palestine” (“SJP”)⁵⁰ chanted “beat that fucking Jew” through a megaphone and
12 bashed a pinata bearing the obvious likeness of Israeli Prime Minister Benjamin
13 Netanyahu.

14 77. Presumably in response, UC President Michael Drake and the
15 Chancellors of UC Campuses jointly issued a statement on or about November 10,
16 2023. Rather than responding explicitly to the incident and acknowledging the
17 antisemitic nature of the conduct, the statement referenced anti-hate and tolerance
18 language broadly and coupled antisemitism with Islamophobia despite the incident
19 only evidencing antisemitism. The statement’s broad terms and failure to call out

20 _____
21 ⁴⁸ Aaron Bandler, *Nearly 300 UCLA Faculty Members Call on University to*
22 *Denounce Anti-Israel Rallies on Campus*, JEWISH JOURNAL, (Nov. 10, 2023)
<https://jewishjournal.com/news/365107/nearly-300-ucla-faculty-members-call-on-university-to-condemn-hamas-terror-attack-anti-israel-rallies-on-campus/>.

23 ⁴⁹ This is “a phrase that can be used to call for the elimination of the State of Israel
24 and/or ethnic cleansing of Jews living there, to be replaced with Palestinian control
25 over the entire territory from the Jordan River to the Mediterranean Sea.” American
Jewish Committee, “*From the River to the Sea*,” Translate Hate, (last visited Apr.
10, 2026), <https://www.ajc.org/translatehate/From-the-River-to-the-Sea>.

26 ⁵⁰ SJP is a pro-Hamas group. See Michael Starr, *October 7 victims sue SJP, AMP*
27 *for serving as Hamas Propaganda arm*, THE JERUSALEM POST (May 3, 2024, 11:58
28 AM, Updated: May 5, 2024, 7:39 PM), <https://www.jpost.com/israel-news/article-799716>.

1 the incident for what it was erased and minimized the specific experiences of Jewish
2 individuals who witnessed or felt threatened by the violence and threats of violence
3 captured in video and shared broadly on social media.

4 78. In another incident, on or around October and November 2023, Jewish
5 students and faculty reported antizionist activists on campus holding knives.⁵¹

6 79. Also during this incident, masked protestors with their faces wrapped
7 in keffiyehs⁵² ran around campus with large daggers, aggressively ripping down
8 Israeli hostage posters, defacing UCLA's campus with antisemitic symbols like
9 swastikas and prominent signage, featuring antisemitic slogans like "Free Palestine,
10 Fuck Jews," "Fuck Zionists"; "Jews, the new Nazis"; and "Nazionists."

11 80. On December 6, 2023, the UCLA Police Department instructed a
12 Jewish fraternity to hire extra security for a party it was going to host as a safety
13 precaution.

14 81. As antisemitism spread on the UCLA campus following the November
15 2023 publication of the Judea Pearl letter, Dr. Stein, founder and chair of the Jewish
16 Faculty Resilience Group at UCLA ("JFRG") (*see infra* ¶¶ 207–212), sent a written
17 letter with supporting materials on January 12, 2024, to UCLA Chancellor Block
18 and UC President Drake.

19 82. JFRG's letter documented antisemitic rhetoric, demonstrations, and
20 threatening incidents affecting the Jewish community on campus following the
21 October 7th attacks. The letter requested that University leadership publicly

22 _____
23 ⁵¹ House Comm. on Educ. & the Workforce, *Calling for Accountability: Stopping*
24 *Antisemitic College Chaos*, 118th Cong. at 2:27:14–2:27:40, YouTube (May 23,
25 2024), <https://bit.ly/3WYmUfm> (statement of Chancellor Block).

26 ⁵² The keffiyeh has recently been associated with the pro-Intifada movement. In
27 some contexts, wearing a keffiyeh can reasonably convey support for an antizionist
28 movement that seeks to delegitimize the existence of a Jewish state, marginalize,
and terrorize those who support Israel's continued existence. *See* Eric Rozenman,
No Swastikas, No Hoods, No Keffiyehs, JNS (Aug. 13, 2025),
<https://www.jns.org/opinion/eric-rozenman/no-swastikas-no-hoods-no-keffiyehs>.

1 condemn antisemitism, enforce university time, place, and manner policies, adopt
2 the IHRA definition of antisemitism, and implement antisemitism awareness
3 training for administrators and faculty. The open letter was supported by more than
4 1,300 signatories from UCLA faculty, students, staff, alumni, parents, and donors.

5 83. In February 2024, a scheduled talk at Royce Hall by former Israeli
6 Foreign Minister, Tzipi Livni, hosted by the Younes and Sorayna Nazarian Center
7 for Israeli Studies was moved online due to planned protests and disruptions by
8 antizionist student groups.⁵³

9 84. JFRG Chair Dr. Stein promptly emailed University officials to object
10 to the decision and to warn that the University was yielding to intimidation directed
11 at a Jewish and Israeli speaker.

12 85. Dr. Stein explained that relocating the event from Royce Hall to a
13 virtual format marginalized Jewish voices on campus and signaled that Jewish
14 speakers associated with Israel could not safely appear in person. She urged UCLA
15 administrators to instead provide appropriate security and publicly reject attempts
16 by groups such as SJP and Faculty for Justice in Palestine (“FJP”) to silence the
17 event. Dr. Stein further warned that allowing threats or anticipated disruption to
18 dictate whether Israeli speakers could appear on campus would embolden
19 antisemitic intimidation and undermine UCLA’s commitment to free expression and
20 equal participation for Jewish faculty and students.

21 ***The March 2024 Regents Meeting & The Antisemitic Statue***

22 86. On March 20–21, 2024, the Regents of the University of California
23 and its committees held a meeting on UCLA’s campus.

24 87. During the first day of the Regents meeting, antisemitic protestors
25 placed a statue outside the Meyer and Renee Luskin Conference Center, where the

26 _____
27 ⁵³ Michael Starr, *Tzipi Livni UCLA talk moved online after anti-Israel protest*, THE
28 JERUSALEM POST (Feb. 28, 2024, 10:16 PM),
<https://www.jpost.com/diaspora/antisemitism/article-789482>.

1 Regents meeting was being held. The statue was placed in a highly visible location
2 near the entrance to the Luskin Conference Center, remaining on campus for at least
3 one week.

4 88. Dr. Stein, Dr. Burt, Director Blenner, and Dr. Hoftman observed
5 individuals wearing keffiyehs assembling the statute as they walked from Ronald
6 Reagan UCLA Medical Center to the Luskin Conference Center to deliver public
7 comments to the Regents regarding escalating antisemitism on UCLA’s campus.



19 89. The statue features a “scale” with a pig holding a money bag in one
20 hand higher than a bird cage with a keffiyeh in its other hand. At the foot of the
21 statue is a bucket with a Jewish star of David painted on its front in Israeli-flag
22 colors, along with flame imagery.⁵⁴

23 90. To anyone familiar with classic antisemitic tropes, this statue invoked
24 classic stereotypes portraying Jews as greedy, corrupt, and subhuman. The pig
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26 ⁵⁴ Photo credit: David Myers, *Op-ed: Antisemitic imagery at UC Regents meeting*
27 *protest threatens campus discourse*, DAILY BRUIN, (Apr. 2, 2024, 10:22 PM),
28 <https://dailybruin.com/2024/04/02/op-ed-antisemitic-imagery-at-uc-regents-meeting-protest-threatens-campus-discourse>.

1 imagery in particular echoed the Judensau, a medieval and later Nazi-era motif used
2 to degrade Jews by associating them with pigs, an animal considered ritually impure
3 in Jewish tradition. The display also incorporated Jewish symbols, including the
4 Jewish Star of David, in a manner that appeared to demean and target Jews, and
5 included the words, “Time Is Running Out.” At the time, this phrase had become
6 widely used in public discourse regarding the Israeli hostages taken during the
7 October 7th attacks, including by hostage families, Israeli officials, and
8 international advocates seeking their release. Thus, this phrase carried a widely
9 recognized association with the fate and safety of these hostages.



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20 91. Given the context of escalating antisemitic incidents on UCLA’s
21 campus following the October 7th attacks in Israel, Jewish members of the UCLA
22 community reasonably understood this display to be a hostile, degrading, and
23 threatening message, making them feel unsafe and unwelcome on UCLA’s
24 campus.⁵⁵

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27 ⁵⁵ Aaron Bandler, *UCLA Condemns “Ugly Antisemitic” Pig Display*, JEWISH
28 JOURNAL (Mar. 22, 2024), <https://jewishjournal.com/community/369554/ucla-condemns-ugly-antisemitic-pig-display/>

1 ***Lectures and Other Programming on Campus that Propagated Antisemitism***
2 ***and Created a Hostile Environment for Jews***

3 92. Meanwhile, as antisemitic symbols and protests grew throughout
4 campus, the University allowed discriminatory behaviors to be perpetuated through
5 classes, lectures, and other programming.⁵⁶

6 *Activist in Residence and “Structural Racism and Health Equity” Lecture*

7 93. On February 5, 2024, JFRG Chair Kira Stein sent a letter to Vice
8 Chancellor Rhea Turteltaub (copying Chancellor Block), raising concerns about
9 UCLA’s decision to host Lisa “Tiny” Gray-Garcia as an “activist in residence” at
10 the UCLA Luskin School.

11 94. Gray-Garcia is a known pro-Palestine activist who had publicly posted
12 antisemitic content on her social media, including referring to the October 7th
13 massacre on Israel as “justice” and calling Israel “amerikkklan.” Dr. Stein warned
14 that promoting Gray-Garcia risked conveying institutional endorsement of
15 extremist antizionist ideology to the public.

16 95. On March 27, 2024, first-year medical students were required to attend
17 a session titled “Housing (In)justice in LA: Addressing Unhousing and Practicing
18 Solidarity” as part of a mandatory course called “Structural Racism and Health
19 Equity.”⁵⁷ The DGSOM selected Gray-Garcia as the invited speaker for this
20 mandatory educational session.

21 96. During the lecture, Gray-Garcia led students in a prayer to “mother
22 earth” and then led the entire class in chants of “Free, Free Palestine,” with over
23 half the students reportedly repeating the chant. Faculty and staff present in the

24 ⁵⁶ The instances of discrimination through classes, lectures, and other programming
25 discussed below represent a non-exhaustive sampling.

26 ⁵⁷ Nic White, *UCLA Med School forced first year students to attend ‘structural*
27 *racism’ course where screaming pro-Hamas speaker told them to kneel for bizarre*
28 *woke ‘prayer,’ while pediatrician DEI boss looked on*, DAILY MAIL (Apr. 3, 2024),
<https://www.dailymail.co.uk/news/article-13269831/UCLA-Med-School-bizarre-lecture-pro-Hamas-activist-prayer.html>.

1 classroom did nothing to stop this conduct. Instead, UCLA staff reportedly recorded
2 the names of the students who declined to participate.

3 97. This lecture violated UC Regents Resolution 2301 on Course Content,
4 which forbids the advancement of political indoctrination in educational settings.⁵⁸

5 98. On March 29, 2024, Dr. Stein alerted the UCLA administration by
6 email to Chancellor Block and DGSOM Dean Dubinett of this lecture as another
7 egregious example of indoctrination at the DGSOM. Two days later, Chancellor
8 Block responded via email, stating that Dean Dubinett would contact Dr. Stein to
9 discuss corrective steps. Dr. Stein, however, never received a communication Dean
10 Dubinett.

11 *The “Depathologizing Resistance” Lecture*

12 99. On April 2, 2024, a lecture titled “Depathologizing Resistance” was
13 presented in the UCLA Department of Psychiatry by two psychiatry resident
14 physicians. The lecture was publicly promoted via mass email as a discussion
15 critiquing “the ways in which psychiatry has been used as a tool of oppression,”
16 including “pathologizing self-immolation.”

17 100. The lecture was public, required no registration, and contained no
18 indication of confidentiality.

19 101. Approximately thirty minutes into the lecture, the presenters used the
20 self-immolation of a U.S. Air Force servicemember protesting Israel as the central
21 case study to advance antizionist and antisemitic rhetoric.

22 102. The lecturers described Israel as having “occupied Palestine since
23 1948” and criticized the American Psychiatric Association’s statement condemning
24 the October 7, 2023 terrorist massacre—the most horrific violence against Jews
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27 ⁵⁸ Univ. of Cal. Board of Regents, *Regents Policy 2301: Policy on Course Content*
28 (approved June 19, 1970; amended Sept. 22, 2005),
<https://regents.universityofcalifornia.edu/governance/policies/2301.html>.

1 since the Holocaust—for failing to “acknowledge the 75 years of colonization of
2 Palestine.”

3 103. It is well-settled that psychiatric medical training should provide
4 clinically-grounded, evidence-based instruction focused on patient care,
5 professional ethics, and trainee safety, rather than a forum for political advocacy,
6 ideological messaging, or the vilification of any protected group.

7 104. Here, the Depathologizing Resistance lecture functioned as
8 discriminatory conduct targeting Jews as a protected class; it denied the legitimacy
9 of Jewish self-determination, normalized and justified mass violence against
10 Jews—including the October 7 massacre—and used the suicide of an active-duty
11 servicemember to advance antizionist and antisemitic narratives. The lecture did not
12 serve any legitimate medical, psychiatric, or pedagogical purpose.

13 105. The Depathologizing Resistance lecture also constituted political
14 indoctrination prohibited by UC Regents Resolution 2301 on Course Content,
15 which forbids the advancement of partisan interests and political indoctrination in
16 educational settings.⁵⁹ Notably, the lecture was delivered under UCLA institutional
17 auspices during a psychiatry resident physician lunch, co-sponsored by the
18 Psychiatry Ethics, Community and Global Psychiatry, and the Justice, Equity,
19 Diversity, and Inclusion (“JEDI”) office, and was presented as instructional content
20 in a medical training setting where political advocacy has no legitimate role.

21 106. Even though requested by Jewish faculty, UCLA never issued any
22 formal condemnation of the “Depathologizing Resistance” lecture.

23 107. Instead, UCLA later rewarded the presenters and promoted the faculty
24 sponsor of this lecture to an administrative position.

25 108. For example, one of the presenters was awarded an Anti-Racism and
26 Mental Health Seed Grant, and the other presenter was assigned to train as a resident

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28 ⁵⁹ *Id.*

1 at the UCLA Women’s Life Center for the 2025–2026 academic year—the same
2 clinic from which Dr. Stein was summarily suspended (pending an investigation
3 that never took place) and from which Dr. Burt was subjected to antisemitic
4 intimidation such that she was effectively compelled to take leave. *See infra* ¶¶ 237,
5 297.

6 109. On March 31, 2025, the UCLA Psychiatry Department announced that
7 the resident physicians who presented the “Depathologizing Resistance” lecture
8 (*see supra* ¶¶ 99–105) would be the chief residents of UCLA’s 2025–2026
9 Community Global Psychiatry program.

10 110. On May 30, 2025, UCLA announced the promotion of Dr. Erika Bath,
11 Director of the DGSOM’s JEDI office that co-sponsored the event, to Assistant
12 Dean in the now-renamed Office of Inclusive Excellence.⁶⁰

13 “Revisiting Zionism as a Form of Racism and Racial Discrimination”

14 Programming

15 111. In addition to the antisemitic messaging on UCLA’s campus that
16 contributes to a hostile and discriminatory environment, there is a lack of balance
17 in programming that has been institutionalized.

18 112. For example, on November 13, 2025, an event was held at UCLA
19 entitled “Revisiting Zionism as a Form of Racism and Racial Discrimination.”

20 113. The advertisements for this event indicated that the following campus
21 units sponsored the event: (1) UCLA School of Law Critical Race Studies, (2)
22 UCLA School of Law David J. Epstein Program in Public Interest Law & Policy,
23 (3) UCLA College of Social Sciences Center for the Study of Women Barbara
24 Streisand Center, (4) The Promise Institute for Human Rights, UCLA School of
25 Law, (5) UCLA College of Social Sciences Asian American Studies, (6) UCLA

26 _____
27 ⁶⁰ *See* UCLA Office of the Chancellor, *Announcing the Office of Inclusive*
28 *Excellence*, (Oct. 17, 2024), <https://chancellor.ucla.edu/messages/announcing-the-office-of-inclusive-excellence>.

1 College Humanities English, (7) UCLA Asian American Studies Center, (8) UCLA
2 Luskin Institute on Inequality and Democracy, (9) UCLA American Indian Studies
3 Center, (10) Consortium for Palestine Studies at UCLA, and (11) Palestinian
4 Student Union at UCLA.⁶¹

5 114. In an effort to try to create balanced opportunities for campus affiliates
6 to learn about Zionism and other aspects of Jewish identity, JFRG organized a
7 complimentary event to take place following the “Revisiting Zionism as a Form of
8 Racism and Racial Discrimination” event.

9 115. Specifically, representatives from JFRG reached out to most of the
10 organizations who were listed as co-sponsors to ask for their support in both co-
11 sponsoring the event aimed at promoting dialogue and also disseminating
12 information about the event to their list serves or in the same manner as they
13 distributed information on “Revisiting Zionism as a Form of Racism and Racial
14 Discrimination.”

15 116. JFRG told each unit that there would be no financial cost to support
16 the program through sponsorship or dissemination.

17 117. However, not a single center, department, or unit on campus would
18 provide sponsorship in name or disseminate the event to their communities.

19 118. This imbalance of programming and perspective is by design and
20 demonstrates the institutionalization of antisemitic educational content and
21 indoctrination.

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26 ⁶¹ UCLA College of Social Sciences Center for the Study of Women, *Noura Erakat*
27 *on Revisiting Zionism as a Form of Racism and Racial Discrimination* (Nov. 13,
28 2025, 5:30–7:00 PM), <https://csw.ucla.edu/event/noura-erakat-on-revisiting-zionism-as-a-form-of-racism-and-racial-discrimination/>.

1 ***Departmental Faculty Executive Committee Meetings (2023–2024)***

2 119. UCLA has a shared system of governance that involves collaboration
3 between faculty and administration. This collaboration is primarily facilitated
4 through the Academic Senate.

5 120. Within the Academic Senate, the Faculty Executive Committee
6 (“FEC”) is an elected body representing the faculty within various schools, such as
7 the DGSOM and the Luskin School, and functions as an arm of the Academic
8 Senate.

9 121. The FEC reviews and approves curricular requirements and proposes
10 changes to school regulations.

11 122. The FEC also consults with faculty and administration on educational
12 resources, academic priorities, and budget issues.

13 123. Throughout 2023 and 2024, when UCLA Jewish faculty raised
14 concerns regarding antisemitism at departmental FEC meetings, their concerns
15 were dismissed. Instead of addressing the antisemitic incidents, UCLA leadership
16 subjected Plaintiffs to additional acts of discrimination and retaliation.

17 ***The Pro-Palestinian Encampment (Spring 2024 and on)***

18 124. On the heels of similar pro-Hamas and pro-Intifada encampments at
19 other universities, including the Columbia University encampment in mid-April
20 2024, a group of activists at UCLA “established an unauthorized physical
21 encampment”⁶² on UCLA’s Royce Quad, also known as Dickinson Plaza (the
22 “Encampment”).

23 125. Royce Quad is a large, grassy space located between two buildings to
24 its north, one of which is Royce Hall (and thus the name), and two buildings to its
25 south.

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

1 126. These four buildings make up the original four buildings of UCLA's
2 campus.

3 127. Royce Quad is a common gathering spot for students, frequently used
4 for clubs, fairs, and general socializing. It is also a major thoroughfare for students
5 and faculty to access the rest of UCLA's campus, including buildings such as the
6 Student Activities Center, and the John Wooden Center, and is a short distance from
7 UCLA's business and law schools.

8 128. Royce Hall, built in 1929, is one of the country's finest concert halls,
9 known for its impeccable beauty and acoustics. It hosts a number of concerts and
10 events, seating over 1,800 people.

11 129. Powell library, another of the four buildings that make up Royce Quad,
12 is UCLA's main undergraduate library. Because of its stunning rotunda, it is also
13 used for special events, and it hosts impressive collections and programming.

14 130. The Encampment was set up near the quad on April 25, 2024, and
15 lasted until May 2, 2024, when the Los Angeles Police Department ("LAPD")
16 finally raided and dismantled the Encampment.

17 131. Signage within and around the Encampment included antisemitic slurs
18 such as, "this is the final solution," "fuck Israel," "intifada," "death to the Jews,"
19 "from the River to the Sea" and "intifada revolution."

20 132. Demonstrators at the Encampment chanted "Itbah El Yahud", which
21 translates to slaughter the Jews, while others chanted "death to Israel" and "death
22 to Jews," "die you fucking Jew," and "FUCK ALL Jews."

23 133. Arabic writing appeared in and around the Encampment, demanding
24 Hamas to "burn Tel Aviv to the ground." A Jewish Star of David was also drawn on
25 the ground with the words "STEP HERE" written on it.

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1 134. Then-Chancellor Block later admitted in sworn testimony that these
2 slogans are antisemitic and potentially dangerous because of their call to violence.⁶³

3 135. Antisemitic imagery was also seen throughout the Encampment. For
4 example, “Free Gaza,” “Intifada,” and “baby killers” could be seen graffitied on
5 walls and sidewalks.

6 136. UCLA allowed barricades to be set up, and the members of the
7 Encampment set up and enjoyed a “Jew Exclusion Zone.”



18 137. UCLA allowed protestors to set up plywood barricades and then
19 provided metal barricades to further reinforce the perimeter.

20 138. To gain entry or pass through the Encampment, a person would have
21 to denounce his or her faith and condemn Israel as committing genocide against
22 Palestinians.

23 139. The Encampment also excluded Jewish students and faculty by asking
24 if the person was a “Zionist.” Others Jewish students were excluded if they wore a
25 visible Jewish Star of David necklace.

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27 ⁶³ See House Comm. on Educ. & the Workforce, *Calling for Accountability: Stopping Antisemitic College Chaos*, 118th Cong. at 3:06:20–3:07:07:10, YouTube
28 (May 23, 2024), <https://bit.ly/3WYmUfm> (statement of Chancellor Block).

1 140. UCLA not only encouraged this Encampment, but they hired private
2 security and instructed the UCLA Police Department to prevent Jewish faculty,
3 staff, and students from entering areas controlled by the Encampment. *See Frankel*,
4 744 F. Supp. 3d at 1020 (“Jewish students were excluded from portions of the
5 UCLA campus because they refused to denounce their faith. UCLA does not dispute
6 this.”) (emphasis omitted).

7 141. In fact, UCLA sent multiple messages to the campus community
8 supporting the Encampment.

9 142. For example, referencing the “history of peaceful protest” at UCLA,
10 the administration issued a statement on April 26, 2024 stating: “UCLA’s approach
11 to the encampment is guided by several equally important principles: the need to
12 support the safety and wellbeing of Bruins, the need to support the free expression
13 rights of our community, and the need to minimize disruption to our teaching and
14 learning mission.”⁶⁴

15 143. Yet UCLA failed to extend these commitments to Jewish faculty, staff,
16 and students, whom it excluded from portions of campus and denied the very safety,
17 wellbeing, and free expression rights it claimed to prioritize.

18 144. UCLA even took affirmative steps to protect the Encampment’s
19 physical presence on campus. Specifically, “[u]niversity leadership ordered the
20 installation of metal barriers surrounding the encampment”⁶⁵

21 145. Thus, while UCLA deployed resources to protect the Encampment and
22 its occupants, it simultaneously facilitated the exclusion of Jewish faculty and
23 students from portions of campus.

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26 ⁶⁴ UCLA Newsroom, *UCLA Statement About Encampment on Campus*, (Apr. 26,
27 2024), [https://newsroom.ucla.edu/ucla-statement-about-encampment-on-campus-
28 april-26](https://newsroom.ucla.edu/ucla-statement-about-encampment-on-campus-april-26).

⁶⁵ *See* First Amended Complaint at 9, *Blair v. Regents of the Univ. of Cal.*, No. 24STCV27623 (Cal. Super. Ct. L.A. Cnty.) (filed Dec. 9, 2024).

1 146. On May 2, 2024, “UCLA directed the UCLA Police Department and
2 outside law enforcement agencies to enter and clear the encampment.” *Frankel*,
3 744 F. Supp. 3d at 1022.

4 147. However, the antisemitic protests that violated both UCLA’s policies
5 and the law continued even after the Encampment was dismantled.

6 148. “For example, on May 6,” just days after the dismantling of the
7 Encampment, “protestors briefly occupied [other] areas of [UCLA].” *Id.* “And
8 [again,] on May 23.” *Id.*

9 149. Another encampment was set up on June 10, 2024, incorporating water
10 barricades, but included “tents, canopies, [and] wooden shields,” causing some
11 students to miss final examinations, and others to be evacuated during finals. *Id.*

12 150. Then again, during the week of November 18, 2024, another protest
13 attempted to block Jewish individuals from accessing certain portions of campus.

14 151. In early October 2025, the UCLA FJP posted on social media platforms
15 advertising demonstrations to take place at UCLA on October 6–7, 2025, including
16 a “Vigil for the Martyrs” demonstration at Royce Quad, which is not a permitted
17 location.

18 152. Notably, October 6 was the final night of the Jewish holy days of
19 Sukkot and the evening before the second anniversary of the October 7th Hamas
20 terrorist attack.

21 153. On October 6, 2025, JFRG sent two separate emails to Chancellor
22 Frenk warning about the upcoming protests and urging UCLA to enforce its time,
23 place, and manner (“TPM”) policy. That same day, demonstrators arrived in front
24 of Royce Hall and protested for several minutes, violating the University’s time,
25 place, and manner rules as well as masking rules. UC police and UCLA Student
26 Affairs officers were present at the scene.

27 154. Police informed Jewish professor Richard Steinberg that Associate
28 Vice Chancellor for Campus and Community Safety, Steve Lurie, was commanding

1 them. Rather than enforce the rules or arrest any demonstrators, Lurie attempted to
2 deescalate, employing what he called a “tiered response,” informing the
3 demonstrators that they were in violation of the time, place, and manner rules and
4 asking them to move to the nearby Schoenberg Quad, which was a time, place, and
5 manner-designated location.

6 155. While most demonstrators complied and moved to Schoenberg Quad,
7 a handful of individuals remained at Royce Quad, continuing to violate University
8 time, place, and manner rules. However, none of the demonstrators were arrested
9 by police, and none were disciplined or even asked for identification by Student
10 Affairs officers.

11 156. As the demonstrators moved from Royce Quad toward Schoenberg
12 Quad, a student demonstrator filmed Professor Steinberg and then physically
13 assaulted him by knocking his iPhone out of his hand, while one of the protesters
14 called him a “motherfucker” or words to that effect.

15 157. Many of the protestors moving from Royce Quad toward Schoenberg
16 Quad wore keffiyeh headscarves masking their faces, or medical masks, to conceal
17 their identities.

18 158. Professor Steinberg approached Lurie, engaged in a conversation with
19 him about why Lurie was not enforcing University and campus time, place, and
20 manner rules, or the masking rules. Lurie stated that the masked protesters were
21 not intimidating anyone, and Professor Steinberg mentioned that his phone had been
22 knocked out of his hand by a protester, who was now gone, which Professor
23 Steinberg found intimidating.

24 159. A woman approached and interrupted to also ask Lurie why he was not
25 enforcing the campus rules. Lurie threw up his hands, stated that he could address
26 only one issue at a time, and asked both Professor Steinberg and the woman to
27 identify themselves, which they did; the woman said she was a Daily Bruin reporter.
28

1 The rest of the conversation focused on why Lurie was not enforcing the rules,
2 which was reported on October 7th in the Daily Bruin.

3 160. Lurie later justified his decision not to enforce the rules on the basis
4 that most of the protesters had agreed to move from Royce Quad after being asked,
5 entirely disregarding the time, place, and manner rules and masking rules that had
6 already been violated.

7 161. Despite JFRG’s warnings, a second, much larger SJP protest occurred
8 on October 7, 2025—the exact two-year anniversary of the Hamas attacks.

9 162. On October 10, 2025, JFRG sent a letter to Chancellor Frenk
10 documenting UCLA's failure to enforce TPM policies during the protests. Despite
11 clear violations of UCLA’s policies, including TPM policies, in his October 30, 2025
12 response to JFRG’s letter, Vice Chancellor Steve Lurie stated that in his opinion,
13 there was no violation of UCLA’s policies.

14 ***UCLA Cultural Affairs Commission Discrimination***

15 163. The UCLA Cultural Affairs Commission (“CAC”) is one of the
16 fourteen offices within the Undergraduate Students Association Council (“USAC”),
17 funded by mandatory student fees. CAC’s mission is to create and promote
18 programming that is culturally, politically, and socially relevant—aiming to foster
19 dialogue, creativity, and community engagement among students.

20 164. CAC focuses on “edutainment” (education + entertainment) and arts
21 activism, providing inclusive spaces for students to connect and express themselves
22 through various events and initiatives.

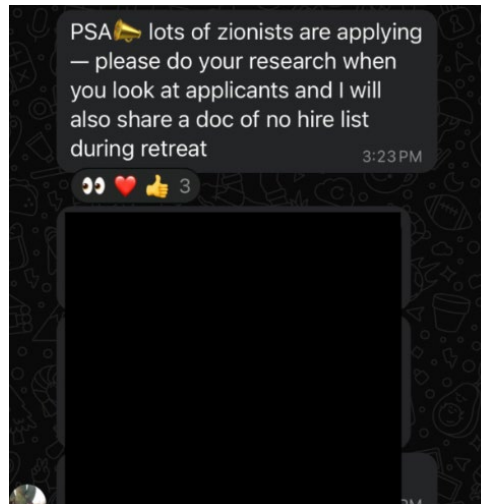
23 165. Starting July 8, 2024, on behalf of JFRG, Dr. Stein and colleagues
24 submitted multiple complaints to UCLA administrators regarding the conduct of
25 CAC. JFRG alleged that CAC misused its official resources and social media
26 platforms to promote anti-Israel messaging and antisemitic tropes, including
27 slogans and materials that incited hostility toward Jewish and Israeli members of
28 the UCLA community. The complaints documented numerous posts and activities,

1 including calls for disruptive protests, dissemination of antisemitic libels, and use
2 of university resources in support of encampments and demonstrations.

3 166. Despite these repeated warnings and requests for intervention, UCLA
4 failed to take timely action to address CAC’s conduct or its impact on the campus
5 environment.

6 167. Ultimately, a Petition for Consideration was filed with the USAC
7 Judicial Board, alleging that Alicia Verdugo, the CAC Commissioner, who held a
8 paid position, discriminated against Jewish students during the Fall hiring process
9 for staff positions.

10 168. Specifically, the Petition claims that Commissioner Verdugo “rejected
11 all applicants who identified themselves as Jewish...even though their
12 applications did not mention Zionism or Israel,” and instructed subordinates to reject
13 them.⁶⁶



26 ⁶⁶ Benjamin Katz, *Evidence Suggests Jewish Students Denied from Cultural Affairs,*
27 *Judicial Board Petition Claims*, HA’AM (Nov. 27, 2024), [https://haam.org/evidence-](https://haam.org/evidence-suggests-jewish-students-denied-from-cultural-affairs-judicial-board-petition-claims/)
28 [suggests-jewish-students-denied-from-cultural-affairs-judicial-board-petition-](https://haam.org/evidence-suggests-jewish-students-denied-from-cultural-affairs-judicial-board-petition-claims/)
[claims/ \[https://perma.cc/G45T-6F6Y\]](https://perma.cc/G45T-6F6Y).

1 169. The Petition also a shared document of CAC’s policies stating that,
2 ““We reserve the right to remove any staff member who dispels . . . zionism”
3 Notably, antisemitism is not mentioned.⁶⁷

4 ***Antisemitic Reports Issued by UCLA-Appointed Task Force (2024-2026)***

5 170. Around December 2023, Executive Vice Chancellor and Provost
6 Darnell Hunt (“EVCP Hunt”) created two task forces, composed of students,
7 academic appointees, faculty, and staff, to “help ensure a welcoming, safe, and
8 inclusive environment at UCLA:” the “Task Force to Combat Antisemitism and
9 Anti-Israeli Bias at UCLA” and the “Task Force to Combat Islamophobia and Anti-
10 Palestinian Bias at UCLA.”

11 171. According to EVCP Hunt, task force members were asked that if they
12 joined, they would make a “commitment” to “openness to and curiosity toward
13 deepening understanding and connection between these two groups over time.”

14 172. The two task forces were to convene together under the Dialogue
15 Across Differences Initiative after the groups “had a chance to flesh out its most
16 pressing concerns regarding our campus climate.”

17 173. The stated mission of the Task Force to Combat Antisemitism and
18 Anti-Israeli Bias at UCLA was to “examine the recent manifestations of
19 antisemitism and anti-Israeli bias on the UCLA campus” and “provide an
20 opportunity to understand experiences of anti-Jewish and anti-Israeli bias across
21 UCLA’s diverse Jewish community.” The Task Force sought to “identify factors
22 contributing to anti-Jewish and anti-Israeli behaviors on campus,” “gather and
23 evaluate evidence regarding the characteristics and frequency of anti-Jewish and
24 anti-Israeli incidents on campus,” and “generate recommendations to combat
25 antisemitism and anti-Israeli bias and promote an inclusive climate on campus.”
26
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28 ⁶⁷ *Id.*

1 174. The Task Force to Combat Antisemitism and Anti-Israeli Bias further
2 stated its mission was to “carry out its work in a collaborative and timely manner
3 across the course of the Spring 2024 quarter” and “strive to work in a spirit of
4 partnership with the Task Force on Combating Islamophobia and Anti-Palestinian
5 Bias at UCLA” to “improve the campus climate for all members of our diverse
6 UCLA community.”

7 175. Based on information and belief, the Task Force to Combat
8 Islamophobia and Anti-Palestinian Bias was tasked with a similar mission that was
9 limited in scope to the Spring 2024 quarter.

10 176. Based on information and belief, the Task Force to Combat
11 Islamophobia and Anti-Palestinian Bias was similar to the Task Force to Combat
12 Antisemitism and Anti-Israeli Bias, in that the Task Force was to identify factors
13 contributing to Islamophobia and anti-Palestinian Bias on campus, gather and
14 evaluate evidence regarding the characteristics and frequency of anti-Muslim and
15 anti-Palestinian incidents on campus, and produce recommendations to promote an
16 inclusive climate on campus.

17 177. At some point, the Task Force to Combat Islamophobia and Anti-
18 Palestinian Bias at UCLA changed its name to the UCLA Task Force on Anti-
19 Palestinian, Anti-Arab, and Anti-Muslim Racism (“AAAR”).

20 178. Several attempts were made to bring the two task forces together to
21 collaborate and for dialogue. Notwithstanding the best efforts of the Task Force to
22 Combat Antisemitism and Anti-Israeli Bias and the Dialogue Across Differences
23 Initiative, the AAAR would not collaborate or engage in dialogue with the Task
24 Force to Combat Antisemitism and Anti-Israeli Bias.

25 179. The AAAR created a website, on which three AAAR reports and an
26 open letter are published: “Report #1 On Anti-Palestinian, Anti-Arab, and Anti-
27 Muslim Racism at UCLA” (May 2024), “Report #2 The Militarization of Campus”
28 (June 2024), “Report #3 Palestinian Human Rights and the Struggle for Racial

1 Justice in the Medical School” (January 2025 and Corrected in May 2025), and
2 “Open Letter to Chancellor Frenk” (March 2025).

3 180. The AAAR reports include statements that amplify antisemitism,
4 libels, and antisemitic conspiracy theories, and supply few citations to support its
5 assertions.

6 181. The AAAR reports use UCLA’s name as if they are official University
7 documents.

8 182. AAAR used its position as a UCLA-appointed body to spread
9 antisemitic rhetoric and target and discredit the JFRG and its members solely for
10 speaking out against antisemitism at the DGSOM.

11 183. According to EVCP Hunt, “the Islamophobia task force produced the
12 [first] report, which itself was not commissioned by the administration.” EVCP
13 Hunt stated: “We are still fact-checking many of the claims made in the report about
14 the encampment and its aftermath, and UCOP’s investigation and our own internal
15 investigation will have something to say about this. The report should not be
16 considered as UCLA’s official position on these matters.”

17 184. Despite EVCP Hunt’s statement, no steps were taken to clarify UCLA’s
18 position to the UCLA community, and departments, including the Department of
19 Community Health Sciences and Fielding School of Public Health, used the
20 AAAR’s report as if it were an official UCLA document containing accurate facts.
21 No corrective action was taken to prevent the continued spread of antisemitic
22 rhetoric contained in the AAAR report or its subsequent reports.

23 185. Likewise, no steps were taken to clarify AAAR’s second report, issued
24 around one month after the first report.

25 186. The failure to clarify AAAR’s reports relation to UCLA led to
26 additional harm. AAAR’s third report propagated antisemitic conspiracy theories,
27 made false accusations that JFRG committed acts that occurred before JFRG even
28

1 existed, and claimed that Jewish faculty members' reports of antisemitism
2 amounted to "doxxing."

3 187. On March 3, 2025, JFRG Chair Dr. Stein asked Chancellor Julio Frenk
4 to publicly disavow the AAAR reports due to its antisemitic targeting of JFRG
5 faculty, but the Chancellor declined.

6 188. UCLA has never retracted, repudiated, or corrected the AAAR reports,
7 which continue to be cited by many faculty members, departments, and in the
8 public.

9 ***Task Force to Combat Antisemitism and Anti-Israeli Bias at UCLA Report***

10 189. In October 2024, the Task Force to Combat Antisemitism and Anti-
11 Israeli Bias at UCLA released its 93-page report detailing the troubling and
12 disturbing rise of antisemitism on the UCLA campus.⁶⁸

13 190. The report was submitted to EVCP Hunt.

14 191. Four hundred twenty-eight students, faculty, and staff at UCLA were
15 surveyed. Among some of the more concerning findings included the following:

- 16 a. Two-thirds of respondents identified antisemitism as a problem
17 or serious problem at UCLA, while three-quarters reported that
18 anti-Israel bias was a problem or serious problem at UCLA.
- 19 b. 70% of respondents perceived the Encampment as a source of
20 antisemitism.
- 21 c. 41% of respondents reported that they had considered leaving
22 UCLA due to antisemitic and/or anti-Israel environment. This
23 rate was highest among UCLA faculty (53%).
- 24 d. Over 70% of respondents reported that antisemitism at UCLA
25 had a negative effect on their stress levels and overall wellbeing.

26
27 ⁶⁸ The Task Force to Combat Antisemitism and Anti-Israeli Bias at UCLA,
28 *Antisemitism and Anti-Israeli Bias at UCLA* (Oct. 16, 2024),
<http://antisemitismreport.org>.

1 e. Three-quarters of respondents reported that antisemitism is
2 “taken less seriously than other forms of hate and discrimination
3 at UCLA.”⁶⁹

4 *Antisemitic Protests Continue in 2026*

5 192. On January 29, 2026, a protest occurred on UCLA hospital grounds,
6 an area closed to the general public and reserved for patients, medical staff, and
7 their families. UCLA permitted approximately 70–80 protesters to assemble
8 directly in front of the medical school’s hospital, in close proximity to working
9 physicians.

10 193. Many protesters wore Palestinian keffiyehs and masks and shouted
11 anti-Israel slogans.

12 194. Both Dr. Hoftman and Dr. Shamsa were present during the incident
13 and were harassed and threatened by the protesters’ conduct. Despite the protest’s
14 unauthorized location, duration, and threatening behavior, UCLA campus police,
15 who were stationed nearby, took no action.

16 195. On February 25, 2026, approximately 30–40 pro-Intifada
17 demonstrators gathered at the UCLA campus to protest a lecture by Ronen
18 Hoffman, a former Israeli diplomat and politician. The UCLA SJP coordinated this
19 protest activity through social media posts demanding the cancellation of the event
20 and labeling the Israeli guest speaker a “war criminal” and “Zionist colonizer.”
21 Protesters chanted antisemitic slogans including “Intifada, Intifada” and “from the
22 river to the sea.”

23 *AMCHA Initiative Report – February 2026*

24 196. In February 2026, the AMCHA Initiative released a comprehensive
25 report documenting the faculty-driven hostile antisemitic environment at UCLA
26 and other UC campuses.⁷⁰

27 _____
28 ⁶⁹ *Id.* at 81.
⁷⁰ “AMCHA” is the Hebrew word meaning “your people.” *See* AMCHA Initiative,

1 197. The AMCHA Report demonstrates that while students are the most
2 visible actors, faculty and academic departments are key institutional drivers of the
3 hostile antisemitic environment on UC campuses.

4 198. Comparing the two-year period of July 2021–June 2023 with July
5 2023–June 2025, the AMCHA Report states that incidents targeting Jewish campus
6 members for harassment, intimidation, threats, exclusion, vandalism, and assault
7 exponentially rose by **3,150%** at UCLA. Likewise, incidents involving antisemitic
8 rhetoric glorifying violence or calling for Israel’s elimination increased by **1,175%**
9 at UCLA during the same period.

10 199. The AMCHA Report notes that faculty and departments were involved
11 in 40% to 60% of these antisemitic incidents, either as perpetrators, public
12 defenders, or institutional enablers, and their behavior persisted even after UC
13 entered into a resolution agreement with the federal government in December 2024,
14 obligating the university to address antisemitism systemwide.

15 200. Additionally, the AMCHA Report notes that at UCLA, at least 115
16 faculty members had publicly endorsed an academic boycott of Israel, and during
17 the 2023–2025 academic years at least 20 of these faculty members held
18 administrative roles such as department chairs, center/program directors, and
19 associate deans. This effectively gave boycott-aligned faculty direct institutional
20 access to shape unit governance, programming, and academic norms.

21 201. Of the 130 incidents involving the targeting of Jewish students or staff
22 for harm documented at UCLA during the 2023–2025 academic years, nearly half
23

24 *When Faculty Take Sides: How Academic Infrastructure Drives Antisemitism at the*
25 *University of California* (Feb. 11, 2026) [https://amchainitiative.org/wp-](https://amchainitiative.org/wp-content/uploads/2026/02/When-Faculty-Take-Sides_AMCHA-Report_Feb-2026.pdf)
26 [content/uploads/2026/02/When-Faculty-Take-Sides_AMCHA-Report_Feb-](https://amchainitiative.org/wp-content/uploads/2026/02/When-Faculty-Take-Sides_AMCHA-Report_Feb-2026.pdf)
27 [2026.pdf](https://amchainitiative.org/wp-content/uploads/2026/02/When-Faculty-Take-Sides_AMCHA-Report_Feb-2026.pdf); AMCHA Initiative, *Report Summary: When Faculty Take Sides: How*
28 *Academic Infrastructure Drives Antisemitism at the University of California* (Feb.
11, 2026), [https://amchainitiative.org/wp-content/uploads/2026/02/When-Faculty-](https://amchainitiative.org/wp-content/uploads/2026/02/When-Faculty-Take-Sides_Report-Summary.pdf)
[Take-Sides_Report-Summary.pdf](https://amchainitiative.org/wp-content/uploads/2026/02/When-Faculty-Take-Sides_Report-Summary.pdf).

1 (59) involved faculty members as either perpetrators, public defenders, or
2 institutional enablers of the antisemitic harassment, intimidation, and exclusion of
3 Jewish and Zionist students. Twenty-one of these antisemitic faculty-involved
4 incidents occurred after UCLA had entered into a systemwide resolution agreement
5 with the Office for Civil Rights.

6 **III. UCLA’S ANTISEMITIC TREATMENT OF PLAINTIFFS**

7 *Kira Stein*

8 202. Dr. Kira Stein attended UCLA as an undergraduate from 1987 to 1991
9 and worked as an administrative assistant in the Psychiatry Department during that
10 time. She completed her psychiatric residency at UCLA from 1998 to 2001.

11 203. Since completing her UCLA psychiatry residency in 2001, Dr. Stein
12 has served as a volunteer clinical faculty member at the DGSOM, supervising
13 psychiatric residents and patients, lecturing, and contributing psychiatric expertise
14 one half day per week at UCLA psychiatric clinics, including the UCLA Anxiety
15 Disorders Clinic and the UCLA Women’s Life Center.

16 204. Although UCLA Health has not compensated Dr. Stein with a salary,
17 she is an employee of UCLA under Title VII and FEHA. Specifically, Dr. Stein has
18 an employee ID number, is required to complete employee trainings, receives access
19 to certain employee benefits, and is covered by the Regents’ medical liability
20 insurance. UCLA bills for Dr. Stein’s treatment of patients and exercises substantial
21 control of Dr. Stein’s work.

22 205. Dr. Stein is Jewish and practices traditional Judaism, is a member of
23 an Orthodox Jewish synagogue, and observes the Jewish Sabbath and other Jewish
24 religious practices. She is the daughter of Dr. Vivien Burt, *see infra* ¶ 271, and
25 granddaughter of Holocaust survivors. Numerous members of her extended family
26 were murdered during the Holocaust.

27
28

1 206. Dr. Stein’s family history also reflects longstanding Jewish ties to the
2 land of Israel. Her third great-grandfather is buried in Safed, Israel, and she has
3 family members living in Jerusalem and Haifa.

4 207. In late 2023, following the October 7th attacks in Israel, Dr. Stein
5 founded and served as Chair of the JFRG at UCLA.

6 208. JFRG is a faculty-led, nonpartisan organization committed to the
7 principle that Jewish faculty, postdoctoral scholars, and staff in higher education
8 deserve the same dignity, protection, and academic freedom afforded to all members
9 of the academic community.

10 209. JFRG was initially founded as a support group for Jewish faculty, staff,
11 and postdoctoral researchers facing escalating anti-Jewish hate and discrimination
12 at UCLA.

13 210. JFRG organized peer support groups and created networks through
14 which affected faculty and staff could share experiences and obtain assistance.

15 211. JFRG quickly evolved to become an advocacy group to educate the
16 UCLA community and the public at large about Jewish identity, history, and
17 Zionism, and to document and counter anti-Jewish hate, including antizionism, on
18 campus.

19 212. As participation grew, JFRG expanded to include hundreds of active
20 participants, including UCLA faculty, staff, and community volunteers. JFRG has
21 grown to over 350 UCLA members and established an Antisemitism Incident
22 Report system for anonymous reporting and documentation. The organization also
23 maintains a mailing list of a few thousand supporters.

24 213. Through her role as JFRG Chair, Dr. Stein personally received,
25 reviewed, and documented reports of antisemitism and requested investigation and
26 corrective action from UCLA leadership.

27 214. Since the Hamas attacks on October 7, 2023, Dr. Stein has endured
28 pervasive antisemitic hostility at UCLA, including antisemitic lectures she has

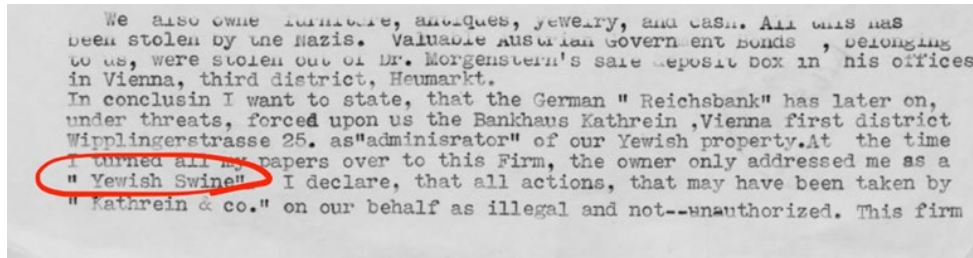
1 warned UCLA administrators about, false accusations of “doxxing,” an indefinite
2 suspension from teaching duties at the Women’s Life Center, and the University’s
3 persistent refusal to acknowledge or remedy the antisemitic discrimination against
4 her.

5 215. Beginning in March 2024, Dr. Stein and other JFRG leaders organized
6 faculty and staff to present public speeches regarding antisemitism to the University
7 of California Board of Regents.

8 216. Dr. Stein was one of many Jewish faculty members who observed the
9 antisemitic statue that was erected during the March 2024 Board of Regents’
10 meeting on UCLA’s campus. *See supra* ¶¶ 86–91.

11 217. Dr. Stein was horrified and physically sickened by the statue. The
12 imagery displayed by the statue immediately brought to mind for her the antisemitic
13 degradation experienced by her own family during the Nazi era.

14 218. Specifically, Dr. Stein’s great grandparents in Vienna were subjected
15 to antisemitic abuse and were called “Judenschwein,” a term historically used to
16 demean Jews by associating them with pigs, as detailed in a letter written by her
17 great-grandfather.



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23 219. Additionally, Dr. Stein’s great grandmother and great aunt were forced
24 by the Nazis to scrub the streets on their hands and knees under threat of the Gestapo
25 before her great-grandparents ultimately fled to Shanghai, China.

26 220. Around the same time as the statue incident, *supra* ¶¶ 86–91, Dr. Stein
27 and a JFRG colleague also met in-person with UCLA Chancellor Block, External
28 Vice Chancellor Rhea Turteltaub, and Executive Vice Chancellor Michael Beck in

1 Moore Hall to share concerns about antisemitism and encourage enforcement and
2 education.

3 221. During the meeting, Dr. Stein expressed her serious concerns that
4 UCLA was not enforcing its time, place, and manner rules and, therefore, the
5 antizionist pro-Intifada protesters were getting more agitated and emboldened,
6 marginalizing and endangering Jews further.

7 222. Chancellor Block, however, appeared disinterested and stated that,
8 rather than enforce the rules, which might inflame the antizionist protestors further,
9 he preferred to “wait for things to blow over.”

10 223. In response, Dr. Stein pointed out that Jewish history illustrates that
11 such permissiveness risks worsening violence. Dr. Stein requested another follow-
12 up appointment to meet again with Chancellor Bock to ensure there was continued
13 follow-up regarding the issues raised in their meeting and with JFRG; Chancellor
14 Block said he was too busy.

15 224. On April 2, 2024, Dr. Stein was alerted to the UCLA Psychiatry
16 Department Zoom lecture titled “Depathologizing Resistance.” *See supra* ¶¶ 99–
17 110.

18 225. Upon learning of the lecture, Dr. Stein contacted Chancellor Block,
19 who directed her to contact Interim Psychiatry Chair Dr. Helena Hansen and Vice
20 Chair of JEDI, David McIntosh. In response, Dr. Stein emailed McIntosh, Dean
21 Dubinett, Chancellor Block, and Dr. Hansen, but received no response.

22 226. After the lecture, Dr. Stein sent a second email to senior UCLA
23 leadership, stating that leadership was warned about the lecture but did not
24 intervene, and that the lecture, in terms of its antisemitic and discriminatory content
25 “surpassed our [Jewish faculty] worst expectations.”

26 227. In April 2024, in light of the ongoing and ever-worsening antisemitic
27 situation at UCLA, Jewish faculty requested that antisemitism be added to the
28 agenda of the April 3, 2024 DGSOM FEC Zoom meeting, and it was added.

1 228. Dean Dubinett, Vice Dean Dr. Joaquin Madrenas, Dr. Stein, and other
2 Jewish faculty attended the DGSOM FEC meeting on April 3, 2024.

3 229. Vice Dean Madrenas was the first administrator to speak after several
4 Jewish faculty presented concerns regarding multiple incidents of antisemitism at
5 the DGSOM. Instead of addressing those concerns, he publicly reprimanded Jewish
6 faculty for recording the “Depathologizing Resistance” lecture, characterized the
7 issues as “differences of political opinion,” and stated he was “equally concerned
8 about the deaths of Gazan babies,” implying that Jewish faculty were indifferent to
9 the situation.

10 230. Additionally, as Jewish faculty recounted anti-Jewish hostility,
11 unidentified participants entered the Zoom meeting using fictitious names like
12 “Protect Academic Freedom,” “Stop being Racist,” and “SS Medical Student.”
13 Several of these unidentified participants engaged in disruptive conduct during the
14 meeting, including interruptions and antisemitic comments directed at Jewish
15 faculty, minimizing their concerns, and making antisemitic accusations of racism
16 against Jewish faculty.

17 231. Dr. Langston Holly, the DGSOM FEC Chair at the time, instructed
18 participants to add their real names to their Zoom profiles within the meeting and
19 activate their cameras or be removed.

20 232. Initially, a small handful of these unidentified participants were
21 removed from the Zoom meeting; however, Dr. Holly soon stopped enforcing the
22 name-and-camera rule, thereby allowing these participants to remain off-camera
23 and participate in the Zoom meeting without using their real names.

24 233. Once these participants were allowed to remain in the meeting, they
25 and others started disrupting the meeting by putting antisemitic comments in the
26 Zoom chat, minimizing Jewish trauma, accusing Jewish faculty of “weaponizing
27 antisemitism”, calling Jewish faculty “anti-black racists,” accusing them of
28 doxxing, and engaging in other unprofessional, hateful, and divisive vitriol.

1 234. Many Jewish professors and faculty left the Zoom meeting early
2 because of the hateful, antisemitic and discriminatory comments made by these
3 participants.

4 235. Nevertheless, at no time during this April 3rd FEC meeting did the
5 leaders of the DGSOM or the FEC stop or remove these participants from the
6 meeting, despite the threats and antisemitic rhetoric they were unleashing on the
7 Jewish faculty.

8 236. At the meeting, one of Dr. Burt and Dr. Stein’s former psychiatry
9 residents falsely accused Jewish faculty of “doxxing” the lecturers by posting a
10 video recording online. Although the accusations were false—as the video
11 documented a publicly advertised event with invitations and slides that already
12 highlighted the speakers’ names—and were indeed a form of antisemitic
13 intimidation, Dr. Stein voluntarily removed the video that same day to de-escalate
14 tensions, with the agreement with UCLA administrators that a dialogue would take
15 place outside the university healthcare setting to improve sensitivity,
16 communication, and inclusion.

17 237. The next day, on April 4, 2024, Dr. Stein received an email from UCLA
18 Psychiatry Residency Education Director Dr. Jonathan Heldt informing her she had
19 been suspended from teaching duties pending investigation due to allegations of
20 “doxxing” and recording the “Depathologizing Resistance” lecture.

21 238. Dr. Stein asked Dr. Heldt which policies she was alleged to have
22 violated. He responded, “I am unfortunately not in a position to know about specific
23 policies and regulations.”

24 239. Around that same time, resident physicians petitioned for the removal
25 of Dr. Stein, Dr. Burt, and other Jewish supervisors.

26 240. Between April 3 and 5, 2024, Director of the UCLA Women’s Life
27 Center Dr. Katherine Unverferth informed Dr. Stein that she intended to utilize Dr.
28 Stein’s scheduled lecture time to conduct sessions for residents to “process” their

1 feelings of being “unsafe” due to Dr. Stein’s alleged “doxxing.” Dr. Stein objected
2 on the grounds of impartiality, interference with an ongoing investigation, and the
3 fact that Dr. Unverferth did not appear to be concerned with the underlying
4 antisemitism that rendered it unsafe for Dr. Stein and other Jewish colleagues. Dr.
5 Unverferth refused to reconsider her plan.

6 241. On April 6, 2024, Dr. Burt spoke with Dr. Unverferth, who revealed
7 that faculty members were targeted by petitioners solely because of their JFRG
8 membership. Dr. Unverferth stated she hoped to save Dr. Burt though Dr.
9 Unverferth “could not save” Dr. Stein.

10 242. False and defamatory rumors circulated across UCLA DGSOM
11 alleging that Jewish faculty had “doxxed” residents and students. Upon information
12 and belief, UCLA faculty and administrative officials participated in disseminating
13 these allegations. Non-Jewish faculty were not subjected to comparable suspensions
14 or exclusions under similar circumstances.

15 243. On April 16, 2024, Dr. Stein authored and led the JFRG Advisory
16 Council review and submission of a comprehensive report to the UC Regents
17 documenting systemic antisemitism at UCLA and across the UC system. The report
18 assembled extensive evidence of policy violations, anti-Jewish harassment, and
19 ideological indoctrination affecting Jewish students and faculty on the main UCLA
20 campus, as well as on the DGSOM at UCLA, and analyzed how the University’s
21 own rules were being selectively ignored. It concluded with specific
22 recommendations for enforcing existing policies and restoring equal protection for
23 Jewish members of the University community. There was no response from the
24 UCLA administration.

25 244. On September 3, 2024, Dr. Stein attended a meeting with Dr. Burt,
26 Interim chair of UCLA Psychiatry Dr. Hansen, and other psychiatry department
27 leaders, including Director of the Adult Division in the Department of Psychiatry
28 Dr. Michael Gitlin, Vice-Chair for Clinical Affairs in the Department of Psychiatry

1 Dr. Tom Strouse, UCLA Psychiatry Dept Vice Chair for Education Dr. Katrina De
2 Bonis, as well as organizational psychologists and moderators Drs Gail Karen
3 Young, and Yotam Schachter. Dr. Hansen acknowledged that the “Depathologizing
4 Resistance” lecture contained antisemitic content but stated the department did not
5 wish to publicly characterize it as antisemitic because doing so could “inflame
6 tensions among residents.” Other participants agreed the lecture was antisemitic.

7 245. At the meeting, Dr. Gitlin said if the lecture had been the same but was
8 discriminatory against any other group, no one in the university would have put up
9 with it, but since it was antisemitism, it was met with silence. Dr. Gitlin stated that
10 he was sorry it had been posted since that exposure had become the focus of the
11 problem.

12 246. Dr. Burt responded that the post was made only after repeated,
13 unsuccessful efforts by JFRG to address the antisemitism through official channels.
14 JFRG had written multiple letters and spoken directly with the Chancellor and other
15 UCLA leaders about prior antisemitic lectures and incidents. In response, JFRG was
16 either ignored, told the situation would resolve on its own, or promised follow-up
17 that never came. Posting was the only remaining way to draw attention to the lecture
18 and antisemitism occurring at UCLA. No one at the meeting disagreed with this.

19 247. Nevertheless, Dr. Hansen denied Dr. Stein’s request for reinstatement,
20 stating that reinstatement could prompt residents to petition again.

21 248. On September 12, 2024, Dr. Stein and other JFRG leaders met with
22 Dean Dubinett in an effort to rectify longstanding antisemitism in the DGSOM at
23 UCLA.

24 249. During the meeting, Dean Dubinett stated he did not want to publicly
25 identify anything that had occurred at the DGSOM as antisemitic because it would
26 cause “negative PR.” While looking at Dr. Stein, he alleged that Jewish faculty were
27 “doxxing” those with anti-Israel views, when in reality, JFRG was simply reporting
28 anti-Jewish hate.

1 250. On October 12, 2024, Dean Dubinett told Dr. Stein he did not want to
2 publicly address antisemitism because of the “Streisand effect.”⁷¹

3 251. On December 11, 2024, Dr. Stein had a virtual meeting with other
4 faculty and Dean Dubinett. Dr. Stein reported increased antisemitic incidents,
5 trauma, fear of retaliation, and diminished trust among Jewish faculty. Dean
6 Dubinett described the “Depathologizing Resistance” lecture as “horrible” but only
7 proposed further discussion rather than corrective action.

8 252. That same day, Dr. Hansen offered to lift Dr. Stein’s suspension only
9 on the condition that Dr. Stein would not be allowed to work in any UCLA
10 psychiatry clinic, including the Women’s Life Center.

11 253. Dr. Stein understood this as a continuation of her suspension, based on
12 her perceived Zionist views, and functioning as an antizionist academic boycott.

13 254. Dr. Hansen also stated that strong teaching evaluations for Dr. Stein
14 would be required going forward. Given the prevailing campus climate, and her
15 history of positive reviews, Dr. Stein perceived this as a warning that biased or
16 retaliatory evaluations could be used against her.

17 255. Dr. Stein submitted a complaint to the DPO on December 11, 2024.
18 Dr. Stein was interviewed, but upon information and belief, no action was taken on
19 her complaint.

20 256. In January 2025, Dr. Stein and other JFRG-affiliated faculty met with
21 Chancellor Frenk.

22 257. During the meeting, Dr. Stein provided Chancellor Frenk with written
23 documentation describing antisemitic incidents reported within the DGSOM.
24

25 _____
26 ⁷¹ Named after Barbra Streisand, the “Streisand effect” describes a situation in which
27 attempts to hide, remove, or suppress information unintentionally draw greater
28 public attention to it. *See, e.g., Sue Curry Jansen & Brian Martin, The Streisand
Effect and Digital Age Publicity*, 9 INT’L J. COMMUNICATION 2994 (2015), 656–671
<https://ijoc.org/index.php/ijoc/article/view/2498/1321>.

1 258. On February 10, 2025, Dr. Hansen emailed Dr. Stein stating she was
2 welcome to return to volunteer teaching duties but did not articulate if this included
3 Dr. Stein returning to the Women's Life Center. Dr. Stein inquired in writing whether
4 this included full restoration of her prior duties and privileges. Dr. Hansen did not
5 confirm that Dr. Stein's specific prior duties at the Women's Life Center would be
6 restored.

7 259. In April 2025, UC Regent Richard Leib requested Dr. Stein assemble
8 faculty members who had experienced antisemitism so they could "avoid what was
9 [at the time] happening to Columbia University." JFRG subsequently prepared and
10 submitted detailed recommendations to University leadership regarding measures
11 that UCLA could take to address antisemitism.

12 260. Dr. Stein attended the lecture by Ronen Hoffman on February 25,
13 2026. *See supra* ¶ 195.

14 261. After the lecture, she had to walk through the protest area to reach
15 Parking Lot 4, where demonstrators' chants and conduct created a distressing,
16 intimidating, and hostile environment toward Jews.

17 262. Dr. Stein reported her discomfort to UCLA's Student Affairs Risk and
18 Compliance Manager, who was walking alongside her towards the parking
19 structure, who reported that the University was allowing the protest to proceed—
20 despite many protesters being keffiyeh-masked and outside the permit-designated
21 area—to protect their free speech unless threats were directed at specific
22 individuals.

23 263. Dr. Stein documented this event extemporaneously but did not report
24 it to the UCLA Civil Rights Office because she had already spoken to the
25 administrator responsible for managing protests and it was clear that a report would
26 be futile given the University mandate to prioritize pro-Intifada protestors over
27 discrimination and harassment of Jewish faculty and staff convening to listen to a
28 pro-peace Israeli diplomat.

1 264. As of March 10, 2026, despite decades of service to UCLA, and in
2 retaliation for Dr. Stein's opposition and reporting of anti-Jewish, including
3 antizionist, discrimination and hostile working conditions at UCLA, Dr. Stein
4 remains suspended from teaching resident physicians at the UCLA Women's Life
5 Center.

6 265. Dr. Stein filed a charge of discrimination with the EEOC. On June 25,
7 2025, the EEOC issued a Letter of Determination finding reasonable cause to
8 believe that since at least October 7, 2023, UCLA and UCLA Health subjected Dr.
9 Stein to an unlawful hostile work environment and different terms and conditions
10 of employment based on race/ethnicity (Jewish), perceived or actual national
11 origin/ethnicity (Israeli/Jewish), and/or religion (Judaism), in violation of Title VII.
12 *See Exhibit A.*

13 ***Vivien Burt***

14 266. Dr. Burt is Professor Emeritus of Psychiatry in the Department of
15 Psychiatry and Biobehavioral Sciences at DGSOM. She has been on the UCLA
16 DGSOM faculty since 1988, where she has held positions as Director of the Adult
17 Outpatient Department and Associate Director of Residency Psychiatry Education.

18 267. She is also the founder and former director of The Women's Life
19 Center of the Resnick UCLA Neuropsychiatric Hospital.

20 268. She has more than 30 years of experience in adult and reproductive
21 psychiatry and has authored numerous articles and book chapters in the field of
22 women's psychiatry, including the first author of *The Clinical Manual for Women's*
23 *Mental Health*, published by the American Psychiatric Press. She has also been a
24 recipient of the Distinguished Service Award of the UCLA Neuropsychiatric
25 Institute and Hospital and an Outstanding House Staff Teaching Award.

26 269. Dr. Burt is Jewish and the daughter of Holocaust survivors. Her
27 daughter is Dr. Kira Stein. *See supra* ¶ 205.

28

1 270. Many members of Dr. Burt’s family were murdered in the Holocaust.
2 Her aunt, to whom she was closely connected, was expelled from medical school in
3 Vienna because she was Jewish. Her grandparents escaped to Shanghai. Her father
4 was imprisoned in Nazi Germany. Her parents fled Nazi Germany and Austria in
5 fear for their lives. Dr. Burt’s lived experience was shaped by growing up in a family
6 profoundly scarred by the trauma they suffered as a direct result of antisemitism.

7 271. Since the Hamas attacks on October 7, 2023, Dr. Burt has been
8 subjected to a hostile and discriminatory environment at UCLA, including being
9 explicitly denied entry to the campus Encampment (*see supra* ¶¶ 124–147) because
10 she was Jewish, facing a coordinated academic boycott by medical residents who
11 labeled her a “Zionist,” having her professional responsibilities reduced, and
12 ultimately being constructively discharged from the institution she helped build.

13 272. Dr. Burt, like Dr. Stein, was present at the “Depathologizing
14 Resistance” lecture and witnessed the antisemitic and discriminatory content of that
15 lecture. *See supra* ¶¶ 99–110.

16 273. Dr. Burt, whose career has been devoted to protecting and preserving
17 life, was deeply disturbed by the lecture’s premise that self-immolation could be
18 justified as a form of martyrdom for political causes such as “Free Palestine.” The
19 lecture conveyed the message that Jews who support Israel’s right to exist are
20 oppressors who endorse genocide and colonialism. Because the lecture framed
21 support for Israel as inherently oppressive—and because many Jews, including Dr.
22 Burt, understand belief in the Jewish State of Israel as integral to their faith—the
23 content was both antisemitic and antizionist.

24 274. The lecture profoundly affected Dr. Burt by what she perceived as an
25 attack on her Jewish identity by members of her own department, including the
26 resident presenters and attendees who expressed support for the lecture.
27 Particularly troubling was the presence of senior faculty administrators who neither
28 intervened during the lecture nor addressed its content afterward. Their continued

1 silence reflects institutional approval and complicity in the antisemitism within the
2 Department of Psychiatry.

3 275. Dr. Burt attended the April 3, 2024 DGSOM FEC meeting. *See supra*
4 ¶¶ 228–236. At that meeting, she was falsely accused directly and explicitly of
5 doxxing others related to the recording of the “Depathologizing Resistance” lecture.

6 276. Many of the antisemitic statements made at the FEC meeting were
7 directed at her personally, where she was baselessly accused of using false
8 accusations of antisemitism as pretext for being racist.

9 277. On April 6, 2024, Dr. Burt spoke with Dr. Unverferth, the Director of
10 the UCLA Women’s Life Center—the position Dr. Burt had held for at least twenty-
11 five years. Dr. Unverferth informed Dr. Burt that there was a petition circulating in
12 the department about Dr. Burt and other Jewish faculty because they were members
13 of the JFRG.

14 278. Dr. Unverferth said she hoped but was not sure she could “save” Dr.
15 Burt from being ousted from the clinic. *See supra* ¶ 241.

16 279. Dr. Burt was appalled that Dr. Unverferth, the psychiatrist who had
17 taken over the very clinic she had founded and directed for almost 30 years, was
18 now suggesting that she needed to be “saved” from expulsion because she was
19 Jewish, a member of the JFRG, and had spoken up in approved official venues about
20 a departmental lecture sponsored and attended by UCLA DGSOM faculty that was
21 clearly antisemitic and political.

22 280. Dr. Unverferth also told Dr. Burt that the residents did not feel “safe”
23 with Dr. Burt because she was a member of JFRG and because she had spoken up
24 about the “Depathologizing Resistance” lecture. Dr. Unverferth clearly supported
25 the discriminatory actions of the residents, explaining it was her job to keep the
26 residents “safe” from Dr. Burt, a Jewish professor.

27 281. Dr. Burt has never made public statements about her belief in the right
28 of Jewish self-determination, also known as Zionism. Rather, she only expressed

1 concern over the “Depathologizing Resistance” lecture through appropriate
2 channels.

3 282. On April 30, 2024, Dr. Burt decided to visit the Encampment with her
4 husband because she wanted to talk to some of the protestors to understand their
5 positions and why they were protesting.

6 283. On her way and around the perimeter of the Encampment, she noticed
7 images of swastikas positioned above the Jewish Star of David and above the
8 pictures of Israeli hostages kidnapped on October 7, 2023.

9 284. When she got to the Encampment barricades, she showed her UCLA
10 ID to the protestors at the edge, announced that she was Jewish, and stated that she
11 wanted to have a dialogue.

12 285. When she was denied entry, she asked why, and the protestors yelled
13 “Divest!” and repeatedly told her that she could not enter. She was explicitly
14 refused entry by the protestors because she was Jewish.

15 286. When Dr. Burt asked why she could not enter, the protestors told her
16 to “look up SJP.” She responded that she wanted to hear the basis for their protest
17 from them.

18 287. The protestors replied that they were not allowed to speak and that
19 there is “somebody in there [in the Encampment]” who is in charge and “giving
20 orders” that protestors cannot speak because they might “misspeak or say the wrong
21 thing.”

22 288. Shortly thereafter, Dr. Burt learned of a meeting between a group of
23 medical school residents and Dr. Heldt.

24 289. Dr. Burt was informed that these residents told Dr. Heldt (whom she
25 had never met and still has never met) they did not feel comfortable receiving
26 instruction from Dr. Burt in the Women’s Life Center because she is a “Zionist” and
27 therefore a “micro aggressor” and they intended to boycott her lectures.

28

1 290. Upon information and belief, Dr. Heldt agreed that if the residents feel
2 uncomfortable with Dr. Burt’s presence, they should see him for permission to leave
3 the Women’s Life Center clinic. Dr. Burt was shocked that, driven by antisemitism
4 and antizionism, these residents were asking to be given permission to abandon their
5 patients by leaving the clinic. By entertaining their requests, Dr. Heldt effectively
6 became complicit in the spread of antisemitic hostility.

7 291. On a phone call with the Dr. Unverferth, Dr. Burt received
8 confirmation that this meeting in fact took place and that her alleged “Zionism” was
9 indeed the concern of these residents.

10 292. At the end of June 2024, UCLA also discriminated against Dr. Burt by
11 reducing her responsibilities. For example, upon information and belief, at the
12 direction of administrative leadership, Dr. Unverferth implemented a system
13 requiring that all faculty attendings receive her approval or her assistant’s approval
14 before entering the Women’s Life Center clinic because residents allegedly felt
15 “unsafe” with Dr. Burt’s presence.

16 293. In short, Dr. Burt, a Jewish physician and professor, was to be
17 monitored by UCLA administration to ensure that the residents would not feel
18 threatened by her based on her ethnic and religious status.

19 294. On June 20, 2024, Dr. Burt met with faculty and departmental
20 leadership, including Dr. Hansen and Dr. Katrina DeBonis, Vice-Chair of Residency
21 Education, and expressed that the “Depathologizing Resistance” lecture was
22 antisemitic and egregious, emphasizing her distress that faculty allowed it to
23 proceed, failed to speak out afterward, and held no one accountable.

24 295. At the June 20 meeting, Dr. Hansen stated that antisemitism had been
25 going on at UCLA even before October 7, 2023. The attendees at this meeting
26 further acknowledged that antisemitism had been spreading in the Department of
27 Psychiatry, and one attending physician bemoaned “the residents are running the
28 show” in the Department.

1 296. Nevertheless, Dr. Hansen implied that she was limited by what her
2 superiors in the UCLA administration allowed her to address the concerns of Dr.
3 Burt. She asked Dr. Burt to be patient given her limited ability to provide
4 remediation. When Dr. Burt requested the opportunity to enter into dialogue with
5 the residents in a neutral space outside of a classroom setting, perhaps with a trained
6 moderator, she was told by Dr. Hansen this was not possible because “the climate
7 is too hot.” Dr. DeBonis vigorously concurred with Dr. Hansen’s assessment.

8 297. In light of these actions, on June 28, 2024, Dr. Burt took a leave of
9 absence, explaining that the reason for her leave was due to the antisemitism that
10 was running rampant and unchecked within both the Psychiatry Department and the
11 Women’s Life Center. Three other faculty and staff (two Jewish and one non-
12 Jewish) also took a leave of absence in solidarity with Dr. Burt.

13 298. Although other members and administrators (including Drs. Hansen
14 and Unverferth) expressed their appreciation for Dr. Burt’s many contributions to
15 the Department, the Women’s Life Center, her patients and trainees, they did not
16 address the antisemitic harassment and discrimination she gave as the basis for her
17 leave of absence. Thus, once again, UCLA faculty and administration refused to
18 speak up about the injustice of antisemitic activities in the Department of Psychiatry
19 at the DGSOM.

20 299. On August 19, 2024, Dr. Burt received a notice from the
21 Discrimination Prevention Office of UCLA (DPO), which stated that the Office had
22 received a report of discrimination against her from an unidentified source.

23 300. DPO provided a link for Dr. Burt to file a complaint, which she did on
24 August 25, 2024.

25 301. Dr. Burt met with a DPO attorney in November 2024 and testified in
26 detail about the antisemitic activities directed against her. To date, no discipline or
27 action has been taken on her complaint.

28

1 302. Despite being away from campus, Dr. Burt has continued her efforts to
2 address antisemitism within the Psychiatry Department and at the Women’s Life
3 Center, but to no avail.

4 303. For example, on September 3, 2024, Dr. Burt along with Dr. Stein, met
5 with the leadership of the Psychiatry Department, including Dr. Hansen, Dr. Katrina
6 DeBonis, Dr. Strouse, and Dr. Gitlin. *See supra* ¶ 244. Also present were members
7 of a leadership consulting firm, Cultivating Leadership.

8 304. In that meeting, Dr. Hansen acknowledged to the Jewish professors
9 that the “Depathologizing Resistance” lecture was antisemitic, but that she had to
10 be careful before taking any action to address antisemitism that might “inflamm” the
11 residents.

12 305. Dr. Hansen explained that UCLA leadership had not permitted her to
13 take substantive actions to address the antisemitism and related turmoil in the
14 Psychiatry Department.

15 306. Dr. DeBonis stated that it was her job as Vice-Chair of Residency
16 Education to ensure that all residents in the department graduate. In a manner that
17 ignored and was tone-deaf to the antisemitism and antizionism in the lecture, Dr.
18 DeBonis then expressed her concern about the future job opportunities of the
19 residents that had delivered the lecture, “Depathologizing Resistance.”

20 307. Tellingly, and despite her conduct in the subject meeting and failure
21 address the antisemitic discrimination against Dr. Burt, UCLA later *promoted* Dr.
22 DeBonis in October 2025 to Associate Director in the Adult Division of Psychiatry
23 at DGSOM.

24 308. At the end of the September 3, 2024, meeting, Dr. Hansen asked Dr.
25 Stein and Dr. Burt if they were willing to participate in a working group facilitated
26 by the Cultivating Leadership consultants.

27 309. Despite Dr. Hansen’s refusal to reinstate Dr. Stein, and her statement
28 that she was not in a position to address the concerns raised by Drs. Stein and Burt,

1 both Drs. Stein and Burt nevertheless expressed their willingness to engage in
2 constructive dialogue in an effort to foster a healing atmosphere within the
3 Department of Psychiatry. However, no follow-up meetings were ever offered or
4 conducted.

5 310. Following the September 3 meeting, Dr. Burt and Dr. Hansen spoke
6 via phone a few days later. Dr. Hansen acknowledged that antisemitism was a
7 problem at the Women’s Life Center and, in particular, among the residents.
8 However, she believed more meetings and “time” would solve the academic boycott
9 that Dr. Burt was experiencing.

10 311. As a result of the academic boycott, and UCLA’s failure to address it
11 as well as the overall antisemitic hostile work environment fostered by UCLA, Dr.
12 Burt was subjected to a de facto constructive discharge based on her national origin
13 and religion that has prevented her from returning to campus.

14 312. Dr. Burt filed a charge of discrimination with the EEOC. On May 23,
15 2025, the EEOC issued a Letter of Determination finding reasonable cause to
16 believe that since at least October 7, 2023, UCLA and UCLA Health subjected Dr.
17 Burt to an unlawful hostile work environment and different terms and conditions of
18 employment based on race/ethnicity (Jewish), perceived or actual national
19 origin/ethnicity (Israeli/Jewish), and/or religion (Judaism), in violation of Title VII.
20 See Exhibit B.

21 *Nir Hoftman*

22 313. Dr. Nir Hoftman is a Jewish Israeli-American anesthesiologist who
23 teaches at the UCLA DGSOM.

24 314. His teaching is overseen by the Department of Anesthesiology, and he
25 has over 25 years of clinical experience.

26 315. Dr. Hoftman is openly Jewish and proudly identifies with his Israeli
27 heritage.

28

1 316. Since the Hamas attacks on October 7, 2023, Dr. Hoftman has
2 experienced severe and pervasive antisemitic harassment at UCLA, including being
3 physically assaulted at the Encampment, blocked from accessing portions of
4 campus, publicly attacked and harassed at faculty meetings for exposing
5 antisemitism, and being subjected to UCLA’s complete failure to protect Jewish
6 faculty or hold perpetrators accountable.

7 317. Beginning in October 2023 and continuing through at least March
8 2024, Dr. Hoftman sent emails and had regular meetings with the DGSOM Dean,
9 Steve Dubinett, regarding his concerns about antisemitism at UCLA following the
10 Hamas terrorist attack.

11 318. On February 12, 2024, a special panel discussion was hosted by the
12 medical school’s JEDI office, titled “Compassion, Empathy, and our Hippocratic
13 Oath: A Conversation about Difficult Dialogues.” The purpose of this emergency
14 session, which the Dean had agreed to host, was to discuss antisemitism with
15 medical students as part of their education and to help stem the tide of antisemitic
16 hostility after the October 7th massacres.

17 319. Unfortunately, the panel became a forum for hateful and
18 discriminatory antisemitic statements.

19 320. For example, during the panel discussion, one faculty member
20 suggested that those who objected to the antisemitic rhetoric expressed by some
21 pro-Palestinian supporters were suppressing free speech and opposing freedom-
22 seeking individuals.

23 321. This same faculty member “explained” antisemitism to the audience
24 by telling them that “antizionism is not antisemitism.”

25 322. Another panelist argued that the genocidal chant “from the River to the
26 Sea” means “different things” to different people thereby minimizing its clearly
27 antisemitic and threatening nature to Jewish students and faculty.
28

1 323. While Dr. Hoftman was not present for the panel discussion, he
2 received recorded clips of the panel from a concerned student.

3 324. On February 13, 2024, the day after the panel, Dr. Hoftman sent a note
4 with the recorded clips to the JEDI Vice Dean McIntosh, expressing his deep
5 concern over the comments made during the event.

6 325. Vice Dean McIntosh responded the next day, dismissing Dr. Hoftman’s
7 concerns by characterizing the antisemitic statements as evidence of
8 “compassionate or empathetic communication.”

9 326. Rather than addressing the substance of Dr. Hoftman’s concerns, Vice
10 Dean McIntosh shared Dr. Hoftman’s note and recordings with Vice Dean of
11 Faculty Joaquin Madrenas.

12 327. Vice Dean Madrenas then warned Dr. Hoftman that the recordings
13 were “unauthorized” and that sharing them “may constituted a violation of
14 University policy and the Faculty Code of Conduct.” At no point did Vice Dean
15 Madrenas express any concern about the antisemitic content of the remarks
16 themselves.

17 328. On March 18, 2024, in a meeting with Dean Dubinett, Dr. Hoftman
18 sought to discuss the rise of antisemitism on the UCLA campus.

19 329. Instead of addressing these concerns, Dean Dubinett accused Dr.
20 Hoftman of being the reason why prospective Jewish medical students were
21 showing less interest in DGSOM.

22 330. In support of this baseless accusation, Dean Dubinett cited an
23 interview that Dr. Hoftman had conducted on an Israeli-American TV station where
24 he discussed antisemitism at UCLA.

25 331. In that same meeting, Dean Dubinett defended antisemitic content
26 posted by another doctor on her social media because she came from a good
27 “Harvard pedigree” and was a friend of Dr. Medell Briggs-Malonson, then Chief of
28 Health Equity, Diversity, and Inclusion at UCLA Health.

1 332. On April 3, 2024, Dr. Hoftman attended the DGSOM’s FEC meeting.
2 *See supra* ¶¶ 228–236.

3 333. During this meeting, Vice Dean Madrenas publicly accused Dr.
4 Hoftman of improperly and illegally recording and transmitting videos of panel
5 discussions, despite the fact that Dr. Hoftman did not record the video clips and only
6 transmitted the videos to his superiors to express concern about the comments.

7 334. Notably, Vice Dean Madrenas made no mention of the antisemitic
8 contents of the subject videos.

9 335. Dr. Hoftman was also excoriated during the meeting because of his
10 interview exposing antisemitism.

11 336. The unknown participants (*see supra* ¶¶ 228–236) who improperly
12 injected themselves with antisemitic comments into the April 3, 2024, DGSOM
13 FEC Zoom meeting publicly accused Dr. Hoftman of “endangering the lives of
14 black faculty and students” even though he had not mentioned anyone in particular
15 during the interview.

16 337. The comments attacking him were so severe and so clearly directed at
17 him personally that Dr. Hoftman considered hiring private security after the
18 meeting.

19 338. Through communications with his colleagues, as well as his own
20 observations, Dr. Hoftman became aware of the conditions at the Encampment and
21 the treatment of Jewish individuals who approached it.

22 339. On April 26, 2024, Dr. Hoftman visited the Encampment. Like so
23 many other Jews, he was told by both protestors and UCLA’s private security that
24 he could not enter, and he was physically blocked from doing so.

25 340. When he expressed his frustration to UCPD, an officer confided in him
26 that, although the protestors and the Encampment itself violated the law, UCPD
27 received its directives from UCLA administration and had been specifically directed
28 not to engage the protestors.

1 341. On April 28, 2024, Dr. Hoftman helped organize and participated in a
2 pro-Israel rally with major Jewish groups.

3 342. During this peaceful demonstration, several individuals were
4 physically assaulted by pro-Palestinian protestors and required medical attention.

5 343. Security and police stood by and did nothing to protect the Jewish
6 participants.

7 344. In fact, at one point during the rally, security and police tried to block
8 off the entrance to the rally so that other Jews could not join or participate in the
9 pro-Israel demonstration.

10 345. On April 28, 2024, Dr. Hoftman was asked to do an interview with Fox
11 News on April 29, 2024. On the morning of April 29, before the interview went live,
12 Dr. Hoftman left a meeting at Geffen Hall and walked toward his car.

13 346. As Dr. Hoftman was looking at his phone to prepare for the Zoom
14 interview and walking in the general direction of the Encampment, two large men
15 who appeared to be protestors from the Encampment (one was wearing a vest and
16 the other was wearing a keffiyeh) blocked his path. As Dr. Hoftman walked around
17 them, another protestor forcefully shoved him from behind.

18 347. The protestor hit him so hard that it knocked Dr. Hoftman off balance,
19 gave him whiplash, and knocked one of his AirPods out of his ear. The protestor
20 then stole the Airpod.

21 348. Although there were private security guards employed by UCLA
22 nearby who witnessed the assault, they did not intervene, nor did they check on Dr.
23 Hoftman's wellbeing.

24 349. Immediately after being assaulted, Dr. Hoftman went to the UCPD
25 station on campus to report the attack, but the station was completely empty.

26 350. He then called 911, and the dispatcher instructed him to return to
27 UCPD, who would take a report of the incident.

28

1 351. He did so, but no efforts were made by any enforcement officer,
2 agency, or security personnel to confront or arrest Dr. Hoftman’s attacker, even
3 though Dr. Hoftman could show law enforcement where the attacker was located
4 within the Encampment because Apple technology allowed him to track the precise
5 location of his stolen Airpod.

6 352. On May 1, 2024, Dr. Hoftman reported all of these incidents alleged
7 above (the exclusion from campus areas, the assault, and the law enforcement
8 failures) to both the UCLA Chancellor and Vice Chancellor.

9 353. On May 31, 2024, the DGSOM held its graduation ceremony.

10 354. UCLA permitted a known Pro-Palestinian graduating medical student
11 to participate in the ceremony by reading a medical oath in Arabic.

12 355. During this UCLA officially sanctioned address, the speaker made
13 hostile statements against Israel. Dean Dubinett stood directly behind the student
14 and did nothing to intervene or end her remarks.

15 356. In response to these remarks, multiple faculty members in attendance
16 cheered and applauded.

17 357. The endorsement of antisemitic speech at a formal University event by
18 UCLA faculty created an intimidating and hostile environment for Jewish faculty
19 members, including Dr. Hoftman, and caused them significant discomfort and
20 distress based on their Jewish identity.

21 358. From June 2024 and continuing to the present, Dr. Hoftman sent emails
22 and had regular meetings with the DGSOM Dean regarding his concerns about
23 antisemitism following the graduation ceremony and other incidents, including
24 those alleged above.

25 359. These meetings failed to produce any meaningful institutional
26 response or corrective action by DGSOM or UCLA.

27 360. In December 2024, Dr. Hoftman filed a complaint with UCLA’s
28 Discrimination Prevention Office (“DPO”) regarding the antisemitism he had

1 experienced. To date, no discipline or action has been taken by DPO in response to
2 this complaint.

3 361. Dr. Hoftman continued to experience and observe antisemitic activity
4 on UCLA's campus, including the January 29, 2026, protest at the Ronald Reagan
5 UCLA Medical Center outdoor quad and the February 2026 protest regarding
6 Ronen Hoffman's lecture. *See supra* ¶¶ 192–194.

7 362. Dr. Hoftman filed a charge of discrimination with the EEOC. On May
8 23, 2025, the EEOC issued a Letter of Determination finding reasonable cause to
9 believe that since at least October 7, 2023, UCLA and UCLA Health subjected Dr.
10 Hoftman to an unlawful hostile work environment based on race/ethnicity (Jewish),
11 perceived or actual national origin/ethnicity (Israeli/Jewish), and/or religion
12 (Judaism), in violation of Title VII. *See Exhibit C.*

13 ***Kamran Shamsa***

14 363. Dr. Kamran Shamsa's ties to UCLA span nearly three decades. He has
15 spent 28 of the last 32 years at the University, first as a student, then as a research
16 assistant, a physician in training, and ultimately a faculty member for the past 15
17 years.

18 364. As part of the clinical faculty, Dr. Shamsa serves as an Associate
19 Clinical Professor in the DGSOM, Department of Medicine, Division of
20 Cardiology.

21 365. Dr. Shamsa is Jewish. He immigrated to the United States from Iran at
22 age eleven with his family to escape religious persecution against Jews. His belief
23 in Israel's right to exist, also known as Zionism, is rooted in his religion's traditions,
24 prayers, and holidays and is central to his Jewish identity.

25 366. Since the Hamas massacre on October 7, 2023, Dr. Shamsa has been
26 subjected to pervasive antisemitic conduct and harassment at UCLA including
27 antisemitic programming, a physical assault, denial of access to campus buildings,
28

1 intimidation, and the University’s refusal to address or meaningfully respond to the
2 foregoing.

3 367. On February 8, 2024, Dr. Shamsa attended a DEI Grand Rounds
4 lecture by Dr. Karthi Sivashanker, who spent at least half of his presentation
5 promoting pro-Palestinian and anti-Israel messages, including cartoons portraying
6 Israel and Jewish people as the cause of Palestinian suffering, and one showing
7 tunnels under a hospital in Gaza. Staff had previously objected to inviting Dr.
8 Sivashanker due to his history of public anti-Israel social media posts.

9 368. It was customary for all Grand Rounds lectures to be recorded and
10 posted online for attendees to obtain continuing medical education credit, but this
11 lecture was not posted online. It was also customary for Grand Rounds lectures to
12 include an opportunity for questions and answers, but no open dialogue was allowed
13 during Dr. Sivashanker’s lecture. In fact, Dr. Shamsa submitted a question via the
14 Zoom platform to inquire why the lecture was one-sided and did not address the
15 October 7th Hamas massacre or the hostages held in captivity, but Dr. Shamsa’s
16 question was ignored.

17 369. The next day, Dr. Shamsa emailed Executive Vice Chair Dr. Jodi
18 Friedman to present his objections to the antisemitic lecture. In response, Dr.
19 Friedman insincerely apologized that Dr. Shamsa was “disappointed” in her for not
20 challenging the speaker’s views.

21 370. On February 12, Dr. Shamsa responded that UCLA was masking
22 antisemitism under the “guise of DEI” and advised that Jewish faculty were drafting
23 a formal letter to address the same.

24 371. Despite these concerns, on March 27, 2024, UCLA hosted another
25 mandatory lecture for first year medical students, which contained antisemitic
26 content. *See supra* ¶¶ 93–98.

27
28

1 372. In April 2024, Dr. Shamsa twice observed Nazi swastikas and other
2 antisemitic graffiti on the walls of Royce Hall. UCLA left this graffiti visible for
3 several hours before removing it.



15 373. During the Spring of 2024, Dr. Shamsa witnessed masked activists
16 wearing keffiyehs who established an Encampment on Royce Quad.

17 374. During the Encampment, activists blocked Dr. Shamsa from entering
18 the encampment area and subjected him to antisemitic signs and chants including:
19 “Intifada is the solution,” “From the river to the sea,” “Jews are baby killers,” “Jews
20 = [swastika],” “Zionism is genocide,” “Free Palestine from the hands of Jews,”
21 “Death to America,” and “Tel Aviv will burn to the ground.”

22 375. On April 25, 2024, activists blocked Jewish individuals, including Dr.
23 Shamsa, when he was walking on a main pedestrian path (the Bruin Walk) from the
24 hospital toward an event across from the Encampment. When Dr. Shamsa said he
25 was not “pro Palestine,” they shouted, “Zionist go away” and surrounded him,
26 forcing him to flee while UCLA security did not intervene.

27
28

1 376. On April 28, 2024, the harassment escalated to physical violence. As
2 Dr. Shamsa approached the Encampment to attend a nearby pro-Israel rally, activists
3 screamed at him, chanting “All Zionists will die.”

4 377. A masked man wearing a keffiyeh rushed him and knocked him to the
5 ground while at least twelve security guards watched without acting. While being
6 ignored by security, Dr. Shamsa laid on his back for twenty to thirty seconds.

7 378. Thereafter, he collected himself and proceeded approximately 100
8 feet before a UCLA security guard shoved him and denied entry. Only after Dr.
9 Shamsa displayed his faculty badge did other guards instruct the first security guard
10 to let him pass. Dr. Shamsa recalls trembling for about 30 minutes afterward.

11 379. On April 30, as violence escalated at the Encampment, Dr. Shamsa
12 repeatedly called LAPD and UCPD begging for help. Both agencies told him they
13 could not intervene without instructions from UCLA’s administration, and no such
14 orders had been issued. UCLA’s lack of response led to numerous physical
15 altercations, trauma from projectiles, and chaos, with many protestors and counter-
16 protestors injured.

17 380. On May 3, 2024, Dr. Shamsa sent an email to then-Chancellor Gene
18 Block, the Executive Vice Chancellor, the Associate Vice Chancellor of the Medical
19 School, the Chief of Cardiology, the DGSOM Dean, and two other University
20 administrators detailing his concerns about the antisemitism and harassment on
21 campus and UCLA’s failure to respond.

22 381. Dr. Shamsa’s email included a three-page attachment describing the
23 antisemitic DEI trainings, the “Zionist go away” incident, and his April 28 assault.
24 He stated that as a Jew, he did not feel “welcome or safe” in conferences, meetings,
25 the hospital, or on campus.

26 382. All recipients of this email were responsible for the safety, security,
27 and well-being of Dr. Shamsa as an employee under UCLA’s anti-discrimination
28 policy and should have referred the email to the DPO. However, on March 12,

1 2026—nearly two years later—Dr. Shamsa’s complaint was closed with no action
2 taken.

3 383. None of the recipients, who held administrative and supervisory
4 position with UCLA, responded, and upon information and belief, none reported
5 his concerns.

6 384. Dr. Shamsa did not formally file a complaint with the DPO about these
7 incidents because he was unaware of the process for doing so; however, his
8 superiors and University administrators were aware of the antisemitism he faced
9 and failed to remedy it.

10 385. Since 2020, Dr. Shamsa had served as the de facto office leader for the
11 UCLA Cardiovascular Center in Westwood, advocating for staffing, administration,
12 and resources throughout the pandemic, and performing all core functions of the
13 Cardiology Clinic Lead.

14 386. Despite having performed the role for five years, and following
15 UCLA’s complicity in the antisemitic discrimination and harassment against Dr.
16 Shamsa alleged above. UCLA did not post the position and instead appointed
17 another doctor as Clinical Lead in November 2024. Dr. Shamsa learned in January
18 2025 that he was passed over. He remains the only physician at his level without a
19 director-title role and was paid roughly \$50,000 less than comparable peers.

20 387. In June 2025, the DGSOM increased billing requirements from 13,400
21 to 15,200 RVUs⁷², making it nearly impossible for Dr. Shamsa to meet the billing
22 threshold after his reduced clinical duties and the addition of new faculty. This
23 change produced an almost \$100,000 salary reduction that colleagues with director
24 roles could offset but he could not.

25

26

27 ⁷² A Relative Value Unit (RVU) is a standardized, three-part metric used by Medicare
28 and private payers to determine reimbursement for physician services. This is the
equivalent of Dr. Shamsa’s billable requirement.

1 388. In August 2025, the Chief of Cardiology instructed Dr. Shamsa to
2 vacate his office of twelve years and move to a much smaller space to accommodate
3 new staff, even though similarly situated peers were not required to relocate.

4 389. On April 30 and June 13, 2025, Dr. Shamsa met with a UCLA Civil
5 Rights Office investigator regarding allegations that Drs. Abel, Fonarow, and
6 Friedman had retaliated against him by denying him the Cardiology Division
7 Leadership position because of, among other things, his involvement in the *Frankel*
8 litigation. *See supra* ¶ 1.

9 390. On August 4, 2025, DPO responded, and the Civil Rights Office issued
10 a Notice of Investigation. As of the filing of this complaint, no action has been taken
11 by UCLA.

12 391. In February 2025, Dr. Shamsa witnessed a large protest of 300–400
13 people outside the Medical Center displaying the same antisemitic messages used
14 during the Encampment, creating noise disturbances audible in patient exam rooms,
15 and blocking access to the hospital parking lot.⁷³ This delayed several of his patients
16 by up to thirty minutes.

17 392. That same month, he learned that UCLA’s SJP, which is known for its
18 antisemitic rhetoric and conduct, vandalized the nearby home of Regent Jonathan
19 “Jay” Sures, harassing his family, painting red “bloody handprint” graffiti, and,
20 upon information and belief, hanging threatening banners containing antisemitic
21 messages, yet neither UCLA nor the Regents sought criminal charges. Although
22 UCLA issued an interim suspension to SJP, the same students continued to gather
23 and disrupt campus operations.

24 393. These incidents were followed by further displays of antisemitic
25 hostility. On March 23, 2025, Dr. Shamsa found a pro-Palestine bag in the ICU
26 break room marked with the borders of Israel replaced by the Palestinian flag, a

27 _____
28 ⁷³ Similar protests occurred outside Westwood Cardiology fifteen to twenty times
since October 7, 2023, with building access blocked on multiple occasions.

1 symbol frequently used to intimidate Jewish faculty and students since the October
2 7th attacks.

3 394. In October 2025, masked activists staged a “Week of Rage” with
4 antisemitic signs, repeated violations of campus protest rules, and no security
5 response. The activists also erected a one-day encampment on October 21 with
6 similar harassment.

7 395. From November 18–20, 2025, activists again blocked campus areas
8 and harassed the UCLA community during a Regents meeting.

9 396. The pervasive pattern of antisemitism continued into 2026. For
10 example, on January 29, Dr. Shamsa observed protesters outside the DGSOM’s
11 hospital. Some were masked and wearing keffiyehs, while shouting anti-Israel
12 slogans as UCLA police again took no action. *See supra* ¶¶ 192–194.

13 397. A charge of discrimination was filed with the EEOC for Dr. Shamsa.
14 On May 23, 2025, the EEOC issued a Letter of Determination finding reasonable
15 cause to believe that since at least October 7, 2023, UCLA and UCLA Health
16 subjected Dr. Shamsa to an unlawful hostile work environment, denial of
17 promotion, and different terms and conditions of employment based on
18 race/ethnicity (Jewish), perceived or actual national origin/ethnicity
19 (Israeli/Jewish), and/or religion (Judaism), as well as retaliation for complaining of
20 discrimination, in violation of Title VII. *See* Exhibit D.

21 ***Ian Holloway***

22 398. Dr. Ian Holloway was a tenured full professor in the Department of
23 Social Welfare at the Luskin School, and later transferred to the School of Nursing,
24 where he is currently on medical leave. *See infra* ¶ 443.

25 399. He is a licensed clinical social worker whose research examines health
26 disparities among sexual and gender minority populations, and he co-directs the
27 Southern California HIV/AIDS Policy Research Center.

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1 400. Dr. Holloway is Jewish and has openly expressed his Jewish identity
2 throughout his tenure at UCLA.

3 401. Since the Hamas attacks on October 7, 2023, Dr. Holloway has faced
4 pervasive and targeted antisemitic harassment at UCLA. This conduct included
5 classroom vandalism identifying him as a signatory of the Judea Pearl letter (*see*
6 *supra* ¶¶ 73–74) and colleagues publicly declaring that Jewish faculty could not be
7 trusted in personnel decisions, for which no disciplinary or protective action was
8 taken. Dr. Holloway was also excluded from departmental activities based on his
9 Jewish identity, and experienced resulting panic attacks requiring medical
10 accommodation.

11 402. The hostile environment and retaliation, coupled with the absence of
12 meaningful institutional response, ultimately forced Dr. Holloway to transfer out of
13 the Luskin School to the School of Nursing. On January 1, 2026, Dr. Holloway
14 went on medical leave, which required him to re-assign all of his grant-funded
15 research to another Principal Investigator and forced Dr. Holloway to incur
16 significant professional and financial hardships.

17 403. The events that occurred at UCLA after the October 7th Hamas
18 massacre demonstrate how this hostile environment unfolded. On October 9, 2023,
19 Dr. Holloway and other Jewish faculty sought to circulate a departmental message
20 of support for Israel and all victims of the attack, consistent with the Department of
21 Social Welfare’s established practice of issuing statements following events of
22 national and international significance, including events involving discrimination
23 and violence against protected minority groups.

24 404. That day, when discussing this request during a regularly-scheduled
25 faculty meeting, Professor Carlos Santos (affiliated with Faculty for Justice in
26 Palestine) strongly objected, characterizing the situation as “complicated.”
27 Additionally, another tenured professor stated that “the world had not changed”
28 because of the October 7th atrocities committed against Israel.

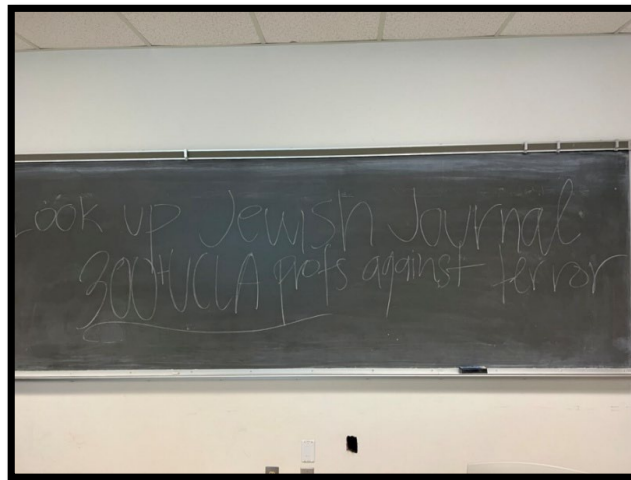
1 405. After this meeting, the Department Chair did not issue any
2 departmental statement to address the October 7th attacks on Israel. This decision
3 was inconsistent with the department’s established practice.

4 406. The differential treatment of the October 7th attacks compared to other
5 events for which the department had previously issued statements signaled to Dr.
6 Holloway and other Jewish faculty that their concerns would not receive equal
7 consideration.

8 407. Dr. Holloway signed the Judea Pearl letter in early November 2023,
9 condemning the October 7th attacks and advocating for peace on campus and
10 beyond. *See supra* ¶¶ 73–74.

11 408. An article was published in the Jewish Journal on November 10, 2023
12 discussing the Judea Pearl letter.⁷⁴

13 409. On November 14, 2023, Dr. Holloway arrived at his classroom and
14 found a message scrawled on the chalkboard: ‘Look up Jewish Journal 300+ profs
15 against terror.’ The words “300+ prof” were underlined. This message appeared to
16 be a direct reference to the Judea Pearl letter Dr. Holloway had signed in early
17 November 2023, and the article published in the Jewish Journal on November 10,
18 2023.



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28 ⁷⁴*Supra* n.48.

1 410. Dr. Astor, the only other Jewish professor teaching an 8:00 a.m. class
2 in the Department of Social Welfare, confirmed the identical message appeared in
3 his classroom. *See infra* ¶ 531.

4 411. After checking other classrooms, Dr. Holloway and Department
5 Manager Shelly Brooks found no other chalkboards had been vandalized,
6 demonstrating the message only targeted the two Jewish professors in the
7 Department.

8 412. At this point, Dr. Holloway viewed this as an attempt to intimidate him
9 based on his Jewish identity and felt his personal safety was threatened.

10 413. On November 15, 2023, he filed a formal incident report with the
11 Director of Human Resources for the Luskin School, Pamela Harris, Dean
12 Anastasia Loukaitou-Sideris, and the Department Chair, and submitted a complaint
13 through the UCLA Equity, Diversity & Inclusion (“EDI”) portal. In that complaint,
14 he expressed multiple safety concerns, expressed concern that student hostility
15 could affect his teaching evaluations and personnel decisions and requested
16 clarification of the student and faculty code of conduct

17 414. The Dean responded that because the conduct was anonymous,
18 nothing could be done. The complaint was eventually closed without investigation.

19 415. In late October through November 2023, a counter-letter opposing the
20 Judea Pearl letter circulated among faculty, characterizing concerns about
21 antisemitism as threats to academic freedom.⁷⁵

22 416. In November 2023, during a faculty personnel meeting attended by full
23 professors in the Department of Social Welfare, including Dr. Holloway, Professor
24 Ananya Roy questioned the integrity of Jewish faculty. Professor Roy stated that
25 faculty who had signed the Judea Pearl letter could no longer be trusted to be ethical
26 in personnel decisions, characterizing the Judea Pearl letter as creating
27

28 ⁷⁵ Available [here](#).

1 “intimidation” and “fear” among students and reframing Jewish faculty’s protected
2 expression as harmful.

3 417. As the discussion continued, Professor Roy openly questioned
4 colleagues’ experiences of antisemitism and asserted that Jewish faculty could not
5 fairly judge the work of others. When challenged, Professor Roy denied that her
6 statements were antisemitic and reiterated her position that Jewish faculty who had
7 signed the Judea Pearl letter could not be trusted to participate ethically in personnel
8 matters. Dr. Holloway suggested that Professor Roy should memorialize her
9 concerns in writing to the extent she desired this issue to be placed on the
10 Department’s FEC agenda.

11 418. In December 2023, during a departmental FEC meeting attended by
12 Professors Roy, Susan Lares Nakaoka (Director of Practicum Education), and
13 Judith Perrigo, and Department Manager Brooks, Director Lares Nakaoka told Dr.
14 Holloway that as a white privileged male, he did not have a right to complain about
15 antisemitism.

16 419. The discussions continued to escalate to the point that Dr. Holloway
17 became visibly distressed as colleagues dismissed his Jewish identity and
18 invalidated his experience of antisemitism.

19 420. On December 7, 2023, during his final class session of the fall quarter,
20 two students harassed and intimidated Dr. Holloway by confronting him about the
21 Judea Pearl letter. One student wore a keffiyeh that she had never worn to class
22 before; another, Andrew Flores (a signer of the SJP letter), dressed entirely in black
23 with sunglasses. Neither student had exhibited this behavior previously.

24 421. On December 8, 2023, Dr. Holloway filed a second formal complaint
25 with the Department Chair, HR Director Harris, Dean Anastasia Loukaitou-Sideris,
26 and Associate Vice Chancellor of Academic Personnel Erika Chau about negative
27 student evaluations. Subsequently, his prior concerns about biased evaluations
28 proved warranted because some evaluations from his students that quarter contained

1 negative references to the Judea Pearl letter.

2 422. The same day, after consulting with a psychiatrist who advised him to
3 reconsider his work situation due to the emotional distress he was experiencing, Dr.
4 Holloway resigned from his position as Chair of the Department of Social Welfare
5 FEC.

6 423. Dr. Holloway was interviewed by the Dean of Students regarding the
7 Fall 2023 classroom incidents but was informed that he would not be told of any
8 outcomes from these proceedings.

9 424. Dr. Holloway returned to work in the winter quarter of 2024 without
10 teaching duties, but he continued as the Co-Chair of the Masters of Social Welfare
11 Admissions Committee.

12 425. Antisemitic, hostile communications continued to circulate within the
13 department, including emails that included the phrase “WE SEE YOU,” which Dr.
14 Holloway perceived as a threat, or a warning that he and other Jewish professionals
15 were being watched and targeted for their Jewish identity and their willingness to
16 speak out against antisemitism.

17 426. As a result, Dr. Holloway started having panic attacks. Because of this
18 antisemitic, hostile work environment, Dr. Holloway filed additional EDI
19 complaints and began discussions regarding workplace accommodations.

20 427. On February 20, 2024, Dr. Holloway submitted a formal request for
21 reasonable accommodation through June 30, 2024, supported by medical
22 documentation stating he “has a medical condition that substantially limits his
23 ability to concentrate, think, and communicate” and experiences physical symptoms
24 “when placed in group settings, specifically when and where he feels threatened
25 and/or harassed.”

26 428. On the same date, February 20, 2024, Dr. Holloway sent an email to
27 Anastasia Loukaitou-Sideris to raise formal concerns about how the Luskin School
28 handled concerns brought forth by students, staff and faculty related to antisemitism

1 and the conflict in Gaza. Specifically, he stated “Your endorsement of the FEC’s
2 ‘taking this initiative’ to lead a departmental faculty meeting on this issue, without
3 proper safeguards in place to protect the wellbeing of all faculty, establishes your
4 willingness to support and facilitate a hostile work environment. The full breadth of
5 safety concerns I have raised since November 15, 2023 after I exercised my right to
6 free speech have gone unanswered.”

7 429. On April 4, 2024, a swastika was found graffitied in an elevator at the
8 Luskin School of Public Affairs building, which is the very building where Dr.
9 Holloway worked. The incident was reported to campus police the same day
10 (Report #24-0635). No perpetrator was identified.

11 430. Jewish faculty colleagues reported additional incidents including
12 swastikas in buildings and parking areas and a staff member overhearing an
13 antisemitic slur (“kike”). Although the swastika appeared in Dr. Holloway’s
14 workplace, the University treated it as an isolated incident rather than part of a
15 pattern. The Dean sent an email titled “A Hateful Symbol,” but no meaningful
16 action followed.

17 431. During the Encampment, Jewish students were blocked from campus
18 areas, harassed, and physically confronted. *See supra* ¶ 139. Dr. Holloway was
19 subjected to increased antisemitic conduct on campus. For example, Dr. Holloway
20 observed offensive antisemitic signs and graffiti and multiple displays of Nazi
21 swastikas throughout UCLA’s campus.

22 432. On or around May 3, 2024, Professor Laura Wray-Lake, the
23 departmental FEC Chair, circulated a letter regarding the Encampment that
24 appeared to come from the Department of Social Welfare, yet Jewish faculty—
25 including the Department Chair—were systematically excluded from the drafting
26 process.

27 433. The letter regarding the Encampment contained demonstrably false
28 claims and failed to address antisemitism.

1 434. Dr. Holloway wrote to departmental FEC Chair Wray-Lake and Dean
2 Loukaitou-Sideris asking why Jewish faculty were excluded from drafting the
3 letter; he learned that Dr. Wray-Lake had solicited signatures one-by-one but did
4 not approach Jewish faculty.

5 435. On May 7, 2024, Dr. Holloway filed a formal DPO complaint
6 documenting the pattern of antisemitic discrimination. Thereafter, Dr. Holloway
7 and Professor Astor met with Darnell Hunt (Executive Vice Chancellor and
8 Provost), who told them he was “waiting for the temperature to come down.”
9 Additional meetings with Mike Levine (Vice Chancellor of Academic Personnel),
10 Erika Chau (Associate Vice Chancellor of Academic Personnel), and Mitch Chang
11 (Interim Vice Chancellor of EDI) yielded no concrete action.

12 436. On July 23, 2024, more than two months after filing his DPO
13 complaint, Dr. Holloway was informed that his complaint was still being assessed.

14 437. The investigation was delayed because faculty members, who had
15 harassed Dr. Holloway, refused to be interviewed. Ultimately, his DPO complaint
16 was closed with no findings in January 2025.

17 438. Meanwhile, Dr. Holloway continued under the same accommodation
18 and was excused from faculty meetings while still participating in personnel
19 reviews.

20 439. Dr. Holloway was assigned to review an assistant professor with
21 another tenured professor. He submitted a fair and professional review. Dr.
22 Holloway was later informed that Professors Carlos Santos, Laura Wray Lake, and
23 Ananya Roy characterized his review as “retaliatory” during full faculty meetings
24 that he did not attend. These were the same individuals who had previously targeted
25 him for his Jewish identity. He was given no opportunity to respond to or defend
26 himself against these accusations. These accusations in the presence of tenured
27 faculty further damaged his professional reputation.

28 440. Mike Levine (Vice Chancellor for Academic Personnel) and Erika

1 Chau (Associate Vice Chancellor for Academic Personnel) asked Dr. Holloway to
2 stop voting in Social Welfare personnel matters, despite his continuing rights as a
3 member of the Academic Senate. No finding of misconduct was ever provided to
4 justify this exclusion.

5 441. While Dr. Holloway's accommodation was extended through
6 December 31, 2024, he proactively sought a faculty appointment in another UCLA
7 department.

8 442. However, he learned that faculty in other departments raised concerns
9 because he was considered a "Zionist" and had signed the Judea Pearl letter, thereby
10 effectively gravely damaging his reputation across departments.

11 443. Dr. Holloway began working at the UCLA School of Nursing on
12 January 1, 2025, having effectively been forced out of the Luskin School because
13 of the hostile environment towards Jews. However, Dr. Holloway's appointment to
14 the School of Nursing remained in limbo through the spring of 2025 because the
15 appointment would not be official until July 1, 2025.

16 444. During the appointment process, he was required to interview again,
17 undergo a new personnel process, transfer his grants and staff, and move from a
18 nine-month to a twelve-month appointment. As a result, he experienced a pay cut,
19 loss of research center funding, and was listed as an "affiliate" in email systems for
20 approximately six months.

21 445. Dr. Holloway's career, which he had built over years of dedicated
22 scholarship, was dismantled as a direct consequence of the antisemitic harassment
23 he had endured and UCLA's failure to protect him.

24 446. Dr. Holloway accepted the Director of Research role at the School of
25 Nursing and completed onboarding. He was assigned to co-teach two courses, the
26 first time he had ever been given a co-teaching assignment. Dr. Holloway was also
27 assigned to teach two courses on subject matter outside his area of expertise. He
28 raised concerns about the subject matter of the courses, but his concerns were not

1 adequately addressed.

2 447. Dr. Holloway filed a charge of discrimination with the EEOC, as well
3 as an amended charge thereafter. On May 23, 2025, the EEOC issued a Letter of
4 Determination finding reasonable cause to believe that since at least October 7,
5 2023, UCLA subjected Dr. Holloway to an unlawful hostile work environment
6 based on race/ethnicity (Jewish), perceived or actual national origin/ethnicity
7 (Israeli/Jewish), and/or religion (Judaism), and retaliation for engaging in protected
8 activity, in violation of Title VII. *See* Exhibit E.

9 448. Effective January 1, 2026, based on the pervasive and repeated
10 discrimination he experienced at UCLA, Dr. Holloway initiated formal medical
11 leave through June 30, 2026, which required him to reassign leadership of all
12 research grants and contracts and to lose the associated salary support.

13 ***Sarah Blenner***

14 449. Sarah Blenner is an Academic Administrator III and Director of Field
15 Studies and Applied Professional Training in the Department of Community Health
16 Sciences at the UCLA Fielding School of Public Health, with an appointment
17 through June 30, 2027. She holds a Juris Doctor and a Master of Public Health, and
18 her grant writing has secured over \$3.5 million in funding since 2016. Since fall
19 2019, she has served as instructor of record for 42 courses with more than 1,100
20 students enrolled. Although teaching is not required for academic administrators,
21 since 2021 she has taught approximately six to eight four credit hour courses
22 annually, exceeding the teaching load of tenure track teaching faculty in the
23 Department.

24 450. In the Fall of 2023, Director Blenner applied for a position at UCLA,
25 a position for which she was personally recruited.

26 451. The hiring committee included Dean of the Fielding School, Ronald
27 Brookmeyer, Senior Associate Dean, Sudipto Banerjee, and Associate Dean of
28 Public Health Practice and former Associate Dean of EDI, Alina Dorian. Upon

1 information and belief, Dean Brookmeyer ultimately made the final hiring decision.

2 452. During the application process, the Hamas terrorist attack occurred on
3 October 7, 2023. Four days later, on October 11, 2023, Director Blenner was
4 notified that she was not selected despite being more qualified than the selected
5 candidate. The selected candidate lacked a doctorate equivalent degree and teaching
6 experience, both of which were required or strongly preferred, and was not Jewish,
7 whereas Director Blenner possessed both qualifications, and is Jewish. Upon
8 information and belief, the selected candidate was unable to independently perform
9 the role and later left the University.

10 453. Around this same time, Director Blenner invited a guest speaker, who
11 identified as Israeli, to a class with many diverse speakers present. The speaker's
12 role was unrelated to Israel or current events and was consistent with the course's
13 practice of featuring diverse speakers from various professional disciplines and
14 faith communities. Despite this, some students grieved to administration, and
15 Director Blenner's course evaluations began to worsen. One student wrote,
16 "[W]hen I learned that a Zionist was invited to speaking during the Thursday
17 professional consultations, that made me feel like the class was less of a welcoming
18 environment."

19 454. Not long after this lecture, someone placed threatening signs in another
20 language and in English on her classroom doors before class started. Director
21 Blenner looked at other classrooms in the building and did not observe any signs on
22 those doors.

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455. A QR code on the sign linked to a statement that asserted a genocide is occurring in Gaza, referenced the Judea Pearl Letter signed by Director Blenner, and stated that faculty who signed the “Faculty Against Terror” letter acted contrary to the University’s JEDI commitment to combat inequities and racism.

456. The signs were harassing and intimidating. Director Blenner felt that her safety was threatened and that she was targeted because of her religion, ethnicity, and ancestral heritage, her signature on the Judea Pearl Letter, and her inclusion of an Israeli speaker.

457. From fall 2023 through 2024, during multiple faculty hiring processes, Director Blenner observed discriminatory decision making across four positions based on race, ethnicity, national origin, religion, and antisemitism.

458. In one instance, Chair Gee opposed a more qualified Jewish candidate because she was not Latina, and Director Blenner was excluded from candidate

1 discussions despite being invited to attend.

2 459. In another incident, faculty indicated that a highly qualified Jewish
3 candidate would not be hired because she appeared Jewish rather than Black or
4 African American.

5 460. In a third incident, the Department voted against the most qualified
6 candidate in favor of a less qualified non-Jewish candidate of a different minority
7 identity, but Dean Brookmeyer overruled the vote and extended the offer to the
8 Jewish candidate.

9 461. In a final example, Dr. Holloway sought a transfer to her Department
10 after reporting antisemitism in his own Department. The transfer initially had
11 general support, but that shifted once it was disclosed that antisemitism was the
12 reason for the request.

13 462. No corrective action was taken to address conflict of interest and bias
14 in hiring, even when the Department, Fielding School, and Discrimination
15 Prevention Office were on notice. For example, Director Blenner filed a complaint
16 with the Discrimination Prevention Office regarding hiring of Angie Otiniano
17 Verissimo for Teaching Professor, because the discrimination against the more
18 qualified Jewish candidate who interviewed was so alarming. To Director Blenner's
19 knowledge, no investigation was opened.

20 463. Following the October 7th terrorist attacks, discussions about Gaza
21 and Palestine arose in most faculty meetings during the 2023–2024 academic year,
22 despite little course content in the Department relating to Gaza. One senior faculty
23 member, Randal Kuhn, also routinely injected his political and discriminatory views
24 into faculty discussions and disparaged those who disagreed. On one occasion, he
25 remarked, "I try to use my Jew card, but that does not seem to get me far anymore,"
26 which Director Blenner understood as antisemitic and tokenism.

27 464. In February 2024, Director Blenner traveled to Israel with UCLA
28 faculty. Before the trip, she notified Chair Gee and asked whether any advance steps

1 were required. Chair Gee directed her to contact the administrative team for
2 approval, and Director Blenner did so and received confirmation that she was
3 cleared to travel and work remotely for part of the trip.

4 465. Scrutiny of Director Blenner’s work intensified while she was in Israel
5 and continued after her return. She received emails from Office of Public Health
6 Practice staff, overseen by Associate Dean Dorian, which complained about
7 response times and directed her to copy a junior staff member on correspondence
8 with partners that she had been developing for a decade.

9 466. On March 8, 2024, shortly after returning from Israel, Director Blenner
10 met with Chair Gee regarding alleged student concerns based on a video circulating
11 online. The video showed Director Blenner only in the background while lawfully
12 traveling in Israel with UCLA approval. Chair Gee expressed concern that students
13 might believe she would not fairly evaluate their work and asked her to send an
14 announcement assuring students that she would not discriminate, particularly in
15 grading.

16 467. Director Blenner understood this request as questioning her academic
17 fairness and integrity because she is Jewish. She told Chair Gee that it felt like a
18 request for an apology for being Jewish, but that similar apologies would not be
19 required of similarly situated non-Jewish faculty. She proposed that the Department
20 instead reaffirm its collective commitment to fair grading, but Chair Gee declined
21 and continued to press for an individual statement. Director Blenner stated that such
22 communications were typically the responsibility of the chair and that she would
23 not send the email absent a written directive. Chair Gee stated that he would consult
24 with a Chinese, Jewish friend. Director Blenner feared retaliation and needed Chair
25 Gee’s support for grant proposals; she reported these concerns to Dean Brookmeyer
26 and others.

27 468. Following this event in March 2024, Director Blenner experienced
28 severe anxiety and depression due to workplace stress and antisemitic

1 discrimination, and her physician recommended medical leave.

2 469. As the workplace became increasingly hostile toward Jews with
3 connections to Israel, Director Blenner and others met with Dean Brookmeyer and
4 Senior Associate Dean Banerjee to raise concerns about antisemitism in the
5 Department.

6 470. Director Blenner requested that the Dean implement safeguards for an
7 upcoming webinar called “Health Impact Projections for the Gaza Crisis” to ensure
8 that antisemitism, including antizionism, were not infused in the webinar. She also
9 requested an additional speaker to provide an alternate perspective on the problems
10 of the Hamas-run Ministry of Health statistics being presented or offer additional
11 programming at a later date that could address health impact on Israelis post
12 October 7.

13 471. To her knowledge, there has been no school-sponsored webinars or
14 other educational programming on the health impact post-October 7 to Jews or
15 Israelis. Although Dean Brookmeyer and Senior Associate Dean Banerjee stated
16 that Director Blenner had the right to file a complaint, they asked for time to
17 consider a course of action. No action was taken.

18 472. Kuhn proposed and Chair Gee agreed to cancel a faculty meeting
19 because it conflicted with the “Health Impact Projections for the Gaza Crisis”
20 webinar that students had “experienced trauma” in securing school sponsorship and
21 that CHS faculty were obligated to show “solidarity for the community.” The
22 faculty meeting was rescheduled, curtailing regular Department business. Faculty,
23 particularly junior faculty, felt pressure to attend. Director Blenner attended and
24 asked questions about the validity of the dataset and model during the session, Dean
25 Brookmeyer, who served as the moderator, did not ask any of her questions to the
26 guest speaker.

27 473. In another instance, Director Blenner was appointed by Executive Vice
28 Chancellor and Provost Hunt to sit on the Task Force to Combat Antisemitism and

1 Anti-Israeli Bias at UCLA. *See supra* ¶ 170. Because of this request, she asked her
2 department if it was possible to change the time that her course was scheduled to
3 meet to minimize time conflicts. Her request was denied.

4 474. As Director Blenner balanced her commitments to UCLA, Chair Gee
5 requested that she meet with him during Passover to discuss concerns. Director
6 Blenner had scheduled time off for the observance of Passover and asked that he
7 email instead.

8 475. In the email, Chair Gee relayed that her Teaching Assistant (TA) had
9 complained that Director Blenner’s participation on the Task Force interfered with
10 student learning. Chair Gee accused Director Blenner of violating the TA contract
11 by requiring the TA to teach and work beyond permitted hours. He suggested that
12 Director Blenner step down from the Task Force and that she expressly tell the TA
13 she would not retaliate.

14 476. It was unclear whether the TA had filed a formal complaint or had
15 merely made a passing comment to other Fielding School employees. Issues
16 concerning TA contract compliance are typically handled by HR, but Chair Gee
17 addressed the matter himself. Director Blenner understood this as retaliation for her
18 participation on the Task Force and prior reports of Chair Gee’s antisemitic conduct
19 made to Dean Brookmeyer.

20 477. At a later meeting about the course, the TA stated that she had not
21 exceeded, and did not expect to exceed, 10 hours of work per week, consistent with
22 her appointment. After reviewing the course structure and student activities, the TA
23 also acknowledged that she was not engaged in teaching, had misunderstood aspects
24 of the class, and agreed that the course learning objectives were being met with no
25 negative impact on student learning.

26 478. Director Blenner was repeatedly targeted by students based on her
27 Jewish identity. Rather than addressing the fact that she was targeted based on her
28 protected identity, Chair Gee and then Vice Chair May Sudhinaraset relied on minor

1 grievances to subject Director Blenner to progressive discipline and pervasive
2 micromanagement. This level of scrutiny had never occurred during her decade-
3 long career at UCLA. She now spends substantial time responding to grievances
4 and defending her work despite consistently meeting and exceeding expectations
5 throughout her 10-year career at UCLA.

6 479. Since October 7, 2023, the Department has repeatedly planned to
7 discuss Director Blenner and her work without adequate notice or first raising
8 concerns with her, including notifying her 45 minutes before a meeting during
9 Passover, while she was out of the office, that concerns about her would be
10 discussed at a faculty meeting.

11 480. Director Blenner’s required classes were also omitted from the
12 departmental Google sheet tracking who taught core courses over time. When
13 Director Blenner requested that her teaching load and core courses be added to the
14 Google sheet, Chair Gee decided instead to change the name and purpose of the
15 tracking document.

16 481. Director Blenner witnessed students creating the antisemitic pig statue
17 placed outside the Regents meeting in March 2024, as well as tents and antisemitic
18 signs in the vicinity. *See supra* ¶¶ 86–91.

19 482. Although Director Blenner did not go to the Encampment, it was close
20 enough to her office that she could hear chants such as “from the river to the sea.”
21 She also observed antisemitic symbols on campus, including swastikas, the
22 antisemitic symbol of a red inverted triangle, and “Zionist” used as a slur, and saw
23 videos of individuals with weapons shouting “fuck the Jews.” Director Blenner
24 feared for her safety, kept her office locked, and was afraid to leave her office.

25 483. In a departmental statement about canceling classes due to the
26 Encampment, signed by Chair Gee and then Vice Chair Sudhinaraset, the protests
27 were compared to historical student movements such as the Civil Rights protests
28 and the Vietnam War demonstrations, emphasizing the importance of student protest

1 and free speech.

2 484. Although Chair Gee and Vice Chair Sudhinaraset stated that they were
3 speaking in their individual capacities, the statement was issued through their
4 official roles at UCLA. Director Blenner understood the statement as minimizing
5 the trauma experienced by Jews after the October 7th massacre, invalidating the
6 lack of safety she felt on campus, and appearing to endorse antisemitic activity,
7 including threats and violence against Jews.

8 485. On or about May 15, 2024, the department's Academic Personnel
9 Coordinator and Assistant to the Chair, sent an email to the Faculty and Academic
10 Appointee's in the department on behalf of Associate Dean Courtney Thomas Tobin
11 circulating AAAR Task Force Report No. 1. *See supra* ¶ 179. Emails sent to the
12 Department list serv "on behalf of" leadership are typically understood as official
13 departmental announcements.

14 486. Director Blenner responded to Associate Dean Thomas Tobin asking
15 whether the report reflected an official Fielding School position or a personal one
16 and requesting that a second report describing the experiences of Jewish and Israeli
17 individuals related to the Encampment also be shared.

18 487. Rather than addressing the request, Associate Dean Thomas Tobin sent
19 a five-page response accusing Director Blenner of being "intellectually
20 disrespectful" and "intellectually irresponsible" and asserting that her request for
21 clarity and additional viewpoints undermined collegiality and could suppress input
22 from other faculty.

23 488. Director Blenner holds one of the most vulnerable positions in the
24 Department. Although she has worked at the Fielding School for more than a
25 decade, she is an academic-appointee with two-year appointments, does not hold a
26 faculty appointment, and cannot vote on Department matters.

27 489. Associate Dean Thomas Tobin concluded her letter by stating she
28 would share her concerns about the exchange with faculty. Director Blenner

1 understood this as an actionable threat given Associate Dean Thomas Tobin’s senior
2 leadership role and record of influence on employment outcomes. Dean
3 Brookmeyer and Chair Gee were copied on the exchange and, to her knowledge,
4 neither responded nor took action.

5 490. By this time, Director Blenner was experiencing severe anxiety and
6 depression due to escalating workplace stress and antisemitic discrimination. She
7 notified HR representative Eric Malmquist of her concerns, including statements
8 made by Chair Gee, and took medical leave from mid-May through early-
9 September 2024. Her employer sponsored disability insurer indicated that the
10 condition appeared consistent with a workers compensation claim because it arose
11 from workplace conditions.

12 491. On September 9, 2024, shortly after returning from medical leave,
13 Director Blenner met with Chair Gee at his request. During the meeting, Chair Gee
14 stated that he “takes antisemitism seriously” and, as a “scholar of inequities,”
15 understood that her experience was not an “Oppression Olympics.”

16 492. Further contributing to the antisemitic environment, Professor Kuhn
17 proposed a course titled “If I Must Die: Public Health, Power, and Palestine,” with
18 a syllabus containing antisemitic tropes and linking to a list targeting Jewish faculty,
19 including Director Blenner, who signed the Judea Pearl Letter. The Department
20 unanimously voted in favor of the course.

21 493. The course was blocked by the Fielding School FEC, but emails were
22 sent advertising webinars that promote antizionist narratives from Department
23 personnel as if the events were official department webinars with the subject line:
24 “If I Must Die.” Director Blenner found these departmental emails distressing. On
25 April 8, 2025, Director Blenner wrote to DPO Investigator Linda Cardenas: “I find
26 it triggering and distressing to receive these emails as official emails from the
27 department and request that they stop.”

28 494. When the Department sent another “If I Must Die” email in January or

1 February 2026, Director Blenner replied inquiring whether the course was
2 condoned by UCLA. Her email went unanswered. On information and belief,
3 university resources were and continue to be used for this effort.

4 495. On information and belief, Kuhn continued efforts to organize the “If
5 I Must Die” course at FSPH by mobilizing undergraduate students and using his
6 UCLA email and title to advocate for the course. In March 2026, emails circulated
7 nationally that reached Director Blenner and created the impression that the course
8 was endorsed by UCLA.

9 496. In September 2024, Director Blenner filed a complaint with the UCLA
10 Discrimination Prevention Office after first raising concerns with Dean
11 Brookmeyer, Senior Associate Dean Banerjee, Associate Dean Thomas Tobin, and
12 Human Resources. Although warned the process could be ineffective and lead to
13 retaliation, she proceeded and submitted written evidence in October 2024.

14 497. On or about October 23, 2024, Director Blenner shared a copy of the
15 Task Force to Combat Antisemitism and Anti-Israeli Bias report (*see supra* ¶¶ 189–
16 191) to Dean Brookmeyer and Senior Associate Dean Banerjee. She suggested that
17 the report be shared widely and expressed her hope that it would spark change. Dean
18 Brookmeyer and Senior Associate Dean Banerjee acknowledged receipt and
19 thanked her for her service, but to her knowledge the report was not disseminated
20 to faculty, staff, or academic appointees in a similar manner that the AAAR report
21 was.

22 498. Around October 2024, students attempted to disrupt her class by
23 interrupting course content to rant about the genocide in Gaza. The students wore
24 shirts with pigs dressed up as police officers, Keffiyahs, and Arabic writing.
25 Director Blenner understood this to be an intentional coordinated effort to disrupt
26 student learning and intimidate her because of her Jewish heritage, and she felt
27 threatened. One student scheduled office hours at one point in the quarter to
28 apologize for the way his classmates treated Director Blenner.

1 499. In November 2024, Director Blenner applied for an Open Rank
2 Professor position but did not advance. Associate Dean Thomas Tobin, who chaired
3 the search committee, stated that she screened applications before forwarding them
4 to the committee. Upon information and belief, Director Blenner’s application was
5 screened out by Associate Dean Thomas Tobin before it reached the committee,
6 preventing full consideration.

7 500. Around December 2024, Director Blenner referred a student academic
8 integrity concern to the Dean of Students, and during the investigation, which
9 concluded around April 2025, the student made statements she understood as an
10 effort to remove her because she is Jewish. She reported this to the Assistant Dean,
11 who indicated it should be referred to the DPO, but although DPO investigator
12 Cardenas and the DPO were aware of this incident, they failed to investigate or take
13 corrective action.

14 501. Director Blenner was notified that she was up for merit review while
15 on medical leave. During the review process, Director Blenner expressed concerns
16 that bias could affect the evaluation of her file and asked that faculty be given
17 guidance because her administrative role differed from positions typically reviewed
18 by faculty committees.

19 502. During faculty discussions about her merit review, Otiniano Verissimo
20 allegedly shared false and biased statements about Director Blenner and voiced
21 strong opposition to her advancement. Director Blenner understood these
22 statements to be based on bias related to her Jewish identity, ethnicity, religion, and
23 national origin.

24 503. Despite contributions exceeding her role, including co-authoring the
25 Antisemitism Task Force report, teaching numerous courses, and securing new
26 grants, Director Blenner’s request for promotion to Academic Administrator IV,
27 Step 11 was denied, with Chair Gee recommending advancement only to Academic
28 Administrator III, Step 15. Human Resources stated in June 2025 that the

1 Department was not required to base promotion decisions on performance and could
2 rely on any factors. Director Blenner appealed in March 2025, identifying
3 procedural errors, inaccuracies, and discriminatory bias and submitting a detailed
4 self-appraisal. Administration later determined the Department failed to conduct a
5 required vote and returned her dossier, which was reconsidered in April 2025 with
6 a third-party observer present.

7 504. Director Blenner later received a second letter from Chair Gee
8 reporting the vote results and again recommending against advancement to
9 Academic Administrator IV. Director Blenner submitted a rebuttal identifying
10 inaccurate and discriminatory statements and reiterating concerns that antisemitic
11 bias had influenced the review.

12 505. Director Blenner's requests for corrective action were ignored, and no
13 remedial action was taken. During this period, DPO investigator Linda Cardenas
14 informed Director Blenner that faculty votes based on information presented to
15 them would not constitute discrimination even if the information originated from
16 discriminatory conduct.

17 506. The department initially indicated that they would send a specified
18 term letter to Director Blenner extending her appointment, but then later changed
19 course indicating that they would put her reappointment to a vote. Based on
20 information and belief, this was not done when her appointment was renewed before
21 October 7, 2023. Director Blenner understood this to be retaliation for her request
22 to reconsider her promotion. Director Blenner ultimately received and signed a
23 specified term appointment renewing her position through June 30, 2027.

24 507. Director Blenner repeatedly sought a faculty or adjunct appointment
25 that would allow her to serve as a principal investigator and receive recognition for
26 her teaching but has not been granted even a no-cost adjunct role, despite similarly
27 situated employees holding such appointments. On information and belief, Chair
28 Gee and others discouraged her application by withholding instructions, warning of

1 institutional “pushback,” suggesting adverse pay consequences, attempting to
2 cancel her job talk, and engaging in dismissive conduct during the presentation. In
3 June 2025, she was advised that she could pursue an ad hoc committee review, but
4 she understood the discussion as discouraging. Although she formally requested
5 such review in October 2025 and Malmquist confirmed receipt, her application has
6 not progressed.

7 508. At the CHS faculty retreat in May 2025, Chair Gee gave a presentation
8 on the budget. It was part of an overview of the poor financial health of the
9 Department. Director Blenner was singled out and had her own budget line
10 highlighted during the presentation, which showed that there was a major increase
11 in the cost of her line item the year that she took medical leave. There was no
12 increase in the prior year when Director Blenner took parental leave for a similar
13 amount of time at a similar time of the year. When a faculty member asked why the
14 budget drastically increased on Director Blenner’s line item, Chair Gee looked
15 directly at Director Blenner and his response implied that it was because of Director
16 Blenner’s medical leave.

17 509. Upon information and belief, Director Blenner’s work was used
18 without credit when Otiniano Verissimo and the Women of Color in Public Health
19 group submitted a February 2025 grant proposal to the UCLA Teaching and
20 Learning Center on a topic overlapping with Blenner’s funded initiatives, using
21 information from her prior report. Despite her subject matter expertise, prior offer
22 to develop related workshops, and invitation to participate, she was excluded from
23 the proposal and subsequent meetings.

24 510. In April or May 2025, Dean Brookmeyer reduced Director Blenner’s
25 teaching responsibilities for a 400-level course based on student evaluations that
26 included antisemitic comments, including statements invoking stereotypes about
27 Jews and money. Director Blenner had previously reported antisemitism in
28 evaluations to Brookmeyer and the DPO. In fall 2025, she was required to co-teach

1 the course with an associate dean and develop new curriculum to address student
2 satisfaction concerns.

3 511. Although the DPO was on notice for months, Investigator Linda
4 Cardenas did not contact Director Blenner until December 2024. Investigator
5 Cardenas then conducted interviews with Director Blenner and her counsel in
6 January, March, April, and May 2025, totaling approximately eight hours without
7 opening an investigation. During these meetings Director Blenner provided detailed
8 testimony and supporting materials.

9 512. Director Blenner filed a charge of discrimination with the EEOC. On
10 May 23, 2025, the EEOC issued a Letter of Determination finding reasonable cause
11 to believe that since at least October 7, 2023, UCLA subjected her to a hostile work
12 environment based on race or ethnicity (Jewish), perceived or actual national origin
13 or ethnicity (Israeli or Jewish), and or religion (Judaism), in violation of Title VII.
14 *See Exhibit F.*

15 513. In September 2025, after months of inactivity, Investigator Cardenas
16 requested additional information and indicated that DPO would investigate only
17 some of the allegations. In October 2025, more than a year after the complaint was
18 filed, Investigator Cardenas issued a Notice of Investigation and a status update
19 excluding numerous allegations and containing inaccuracies regarding Director
20 Blenner's claims, including those directed at Thomas Tobin, whose position as
21 Associate Dean of EDI falls under the same office as DPO.

22 514. In December 2025, Director Blenner's attorney sent a detailed letter
23 correcting the record, appealing the exclusion of allegations, and providing
24 additional examples of discrimination. Investigator Cardenas acknowledged
25 receipt.

26 515. In January 2026, Investigator Cardenas stated that written complaints,
27 attorney letters, and other documentation were not considered evidence, required
28 additional interviews before including allegations, and expressed concern that

1 Director Blenner had raised too many incidents of antisemitism.

2 516. In January 2026, Chair Gee circulated an announcement highlighting
3 Otiniano Verissimo, and in February 2026, when Director Blenner requested a
4 similar announcement regarding her grant and an upcoming event, Chair Gee
5 instead questioned how her work benefited the Department and ultimately included
6 her update only within a general “faculty and staff highlights” email, which he had
7 not previously issued. Director Blenner understood this as minimizing her
8 contributions and diminishing her role to “staff”.

9 517. Around February 2026, during an admissions committee meeting, a
10 faculty member justified an applicant recommendation based on race, ethnicity, or
11 national origin rather than merit, and Chair Gee and other senior faculty did not
12 address the comments. Director Blenner understood this exchange to reflect that
13 decisions across the Department, including hiring, merit, and promotion, are
14 influenced by demographic considerations.

15 518. Around February or March 2026, Senior Associate Dean Banerjee
16 asked whether Director Blenner would teach PH 401 again and indicated former
17 Associate Dean Dorian would be unavailable. Director Blenner agreed and
18 expressed interest in applying for a curriculum development grant, and requested a
19 meeting, but Senior Associate Dean Banerjee indicated that he would not
20 immediately be available to discuss. Director Blenner drafted the proposal to
21 facilitate a more expedited discussion, since the deadline for submission was
22 approaching.

23 519. On March 13, 2026, an assistant dean informed her that PH 401 would
24 be discontinued after Fall 2026, replaced with a new course developed by Associate
25 Dean Dorian, and that Director Blenner would be assigned a co-instructor, none of
26 which Senior Associate Dean Banerjee had disclosed. These decisions were based
27 on earlier antisemitic evaluations rather than more recent feedback. The
28 discontinuation of PH 401 and her exclusion from curriculum planning

1 fundamentally alter her role and, absent intervention, will deprive her of a
2 substantial portion of her responsibilities.

3 520. In a March 23, 2026, meeting about PH 401 updates, Dean
4 Brookmeyer and Senior Associate Dean Banerjee, made statements that suggested
5 that policies and practices were being applied differently to Director Blenner than
6 other faculty and courses.

7 *Ron Avi Astor*

8 521. Dr. Ron Avi Astor held the Marjorie Crump Chair Professorship in
9 Social Welfare at the UCLA Luskin School of Public Affairs from approximately
10 July 2019 until July 2025, with a joint appointment in the UCLA School of
11 Education and Information Studies.

12 522. Dr. Astor’s scholarship examines school violence, bullying,
13 harassment, and discrimination, including research on strategies for peaceful
14 coexistence among Israeli, Arab, Muslim, Palestinian, Druze, and Bedouin students.

15 523. Dr. Astor is Jewish and openly displays signs of his faith on campus,
16 and he holds Zionism as a deeply held religious belief rooted in his Jewish identity.

17 524. Since the Hamas massacre on October 7, 2023, Dr. Astor has
18 experienced severe, persistent, and pervasive antisemitic targeting at UCLA,
19 including classroom vandalism, defamatory letters falsely accusing him of
20 supporting genocide, students refusing to attend his events because he is Jewish and
21 a Zionist, course cancellations, disruption of his research activities, and UCLA’s
22 consistent failure to investigate or address his complaints.

23 525. On October 26, 2023, after the October 7th massacre, Dr. Astor co-
24 hosted a “Healing Group” event open to all students and faculty, featuring readings
25 from multiple faiths to mourn innocent civilian lives lost in Israel and Gaza.

26 526. After the event, a student caucus group stated to the faculty member
27 who co-hosted the Healing Group event that they did not attend because Dr. Astor
28 was Jewish and a Zionist.

1 527. When Dr. Astor raised the students’ boycott due to Dr. Astor’s religious
2 beliefs at a faculty meeting, he was challenged by a colleague who questioned
3 whether the students’ boycott of the event was antisemitic.

4 528. Despite Dr. Astor bringing attention to the matter, there was no
5 response from other faculty, the Department Chair, or Dean Loukaitou-Sideris
6 regarding what role faculty should assume when students engage in antisemitic
7 rhetoric or acts.

8 529. Some faculty advocated a permissive attitude toward antisemitism,
9 claiming those students “were still developing and learning.” Ultimately, the
10 outcome of the meeting was that the students would not be educated about the
11 antisemitic nature of their boycott.

12 530. In or around early November 2023, Dr. Astor signed the Judea Pearl
13 letter. *See supra* ¶¶ 73–74.

14 531. On November 14, 2023, Dr. Astor discovered that someone had
15 vandalized his classroom chalkboard with a message identifying him as a signatory
16 of the Judea Pearl letter. Dr. Astor learned that the same vandalism had occurred in
17 Dr. Holloway’s classroom. *See supra* ¶ 410.

18 532. On November 15, 2023, Dr. Astor and Dr. Holloway jointly submitted
19 a report to HR, the Department Chair, and Dean Loukaitou-Sideris, requesting an
20 investigation and safety assessment.

21 533. Their complaint was closed without investigation, and when Dr. Astor
22 and Dr. Holloway raised this with the DPO, the DPO responded that it only
23 investigates incidents involving faculty perpetrators.

24 534. Despite repeated requests, UCLA never sent a message to students that
25 targeting faculty for signing the Judea Pearl letter was unprotected speech.

26 535. Throughout the 2023–2024 academic year, Dr. Astor and other Jewish
27 faculty who signed the Judea Pearl letter were labeled as Zionists and harassed, with
28 one student telling Dr. Astor, “Don’t worry, we just hate Zionists and not Jews.”

1 536. Around the same time, Dr. Astor’s elective course was cancelled after
2 students withdrew in response to the public circulation of the Judea Pearl letter.⁷⁶
3 Dr. Astor raised his concerns about student bias in enrollment with his Department
4 Chair, but these concerns were dismissed and not investigated.

5 537. On February 14, 2024, an unregistered student group called Luskin
6 Students for Justice in Palestine (“LSJP”) sent a letter to UCLA leadership
7 containing defamatory statements falsely characterizing Dr. Astor as supporting
8 genocide—contrary to his career researching peace and coexistence.

9 538. The letter falsely claimed his Healing Group event was “primarily
10 tailored to Jewish students” when in fact it was open to all faiths. The letter also
11 falsely asserted that Professor Astor’s performance as the Search Committee Chair
12 for the Social Welfare Faculty was biased because he did not include student and
13 faculty input. The letter was widely circulated across many university departments
14 with dozens of faculty and student signatories, including Luskin School faculty,
15 who knew of the falsehoods and defamatory statements in the letter. The letter went
16 viral in the academic community.

17 539. A Luskin faculty member admitted at a faculty meeting that he helped
18 write the letter knowing it contained inaccuracies about Dr. Astor and later
19 apologized.

20 540. The departmental FEC acknowledged the letter contained “personal
21 attacks and inaccurate claims” but took no corrective action against the faculty
22 member who helped draft it. Dr. Astor repeatedly requested that UCLA publicly
23 refute the letter; it has never done so.

24 541. On February 15, 2024, students heckled Dr. Astor as he walked to his
25 car while screaming that Dr. Astor is “complicit with genocide”; when he requested
26 police protection, he was told to “be vigilant.”

27 _____
28 ⁷⁶ Dr. Astor is a popular teacher with consistently high student ratings and decades
of strong enrollment in his elective courses.

1 542. On February 26, 2024, Dr. Astor filed a DPO complaint regarding the
2 LSJP letter.

3 543. Without conducting an intake interview or undertaking an
4 investigation, DPO closed the matter on September 13, 2024, claiming insufficient
5 evidence.

6 544. In early March 2024, a top candidate for the Social Welfare Faculty
7 Chair withdrew and told Professor Astor, who was the Search Committee Chair at
8 the time, that she did so because of the hostility she observed from faculty and
9 students toward Jewish Faculty through the LSJP Letter, specifically referencing
10 Professor Astor and the Department Chair.

11 545. On March 9, 2024, Dr. Astor stepped down from chairing the Search
12 Committee because he believed the false allegations made against him would
13 jeopardize the department's chair search. He asked the Dean and the Chair of the
14 Faculty Executive Committee to meet with students to correct the false assertions
15 and educate them that targeting him because he is a Jewish Zionist was antisemitic.
16 The Dean and Committee Chair met with the students and corrected the inaccurate
17 statements, but they refused to educate the students about their antisemitic conduct
18 toward Dr. Astor.

19 546. Thereafter, at the recommendation of the Provost, Dr. Astor went on
20 medical leave after experiencing severe physical and psychological symptoms
21 brought on by the stress of antisemitic harassment and the lack of response by
22 administrators and leadership to directly address or educate the students about
23 antisemitism. Dr. Astor believed if he as a tenured professor could not physically or
24 psychologically tolerate being at UCLA, there was no place for Zionist Jews on
25 campus.

26 547. On March 31, 2024, Dr. Astor submitted a formal abusive conduct
27 complaint to UCLA Academic Affairs on behalf of himself and Dr. Holloway,
28 documenting the pattern of antisemitic hostile conduct and the university's failure

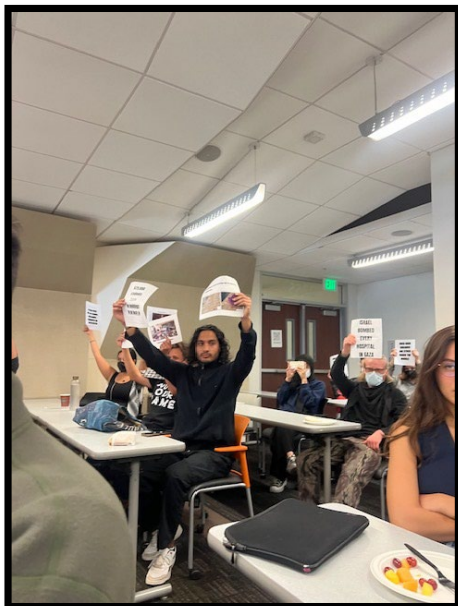
1 to respond meaningfully to their concerns. After months without updates, they were
2 told the investigation was deferred to DPO, even though DPO declined to
3 investigate.

4 548. At the June 2024 graduation, some students requested that “Zionist”
5 faculty not read names, shake hands, or sit in the front row; Dr. Astor chose not to
6 attend rather than suffer the clear antisemitic harassment and indignity of such
7 actions.

8 549. When Dr. Astor returned from medical leave in July 2024, he found an
9 environment that had grown more antisemitic and hostile towards Jews.

10 550. On November 8, 2024, Professor Astor brought his co-Principal
11 Investigator, Professor Mona Khoury-Kassabri, the Vice President of Hebrew
12 University of Jerusalem and an Arab Israeli scholar, to campus for a research talk.
13 Notably, Professor Mona Khoury-Kassabri flew in from Israel to UCLA to present
14 with Professor Astor on their joint research findings.

15 551. More than a dozen individuals disrupted the research presentation by
16 chanting for roughly twenty minutes, halting the presentation.



1 552. Although the Department Chair and Luskin School Dean, who were
2 present, attempted to deescalate the situation, no one contacted UCLA Police, and
3 the event proceeded without institutional support. This harmed the UCLA-Hebrew
4 University partnership and effectively blocked Professor Astor and Vice President
5 Khoury Kassabri’s only chance to present their research findings at UCLA after the
6 October 7th attacks.

7 553. Immediately after the event, Professor Astor requested the Luskin
8 School Dean and Vice Chancellor Beck to send out a clarifying letter to Luskin
9 faculty and students explaining that disrupting a research presentation violates time,
10 place, and manner restrictions and will not be tolerated in the future. Administrators
11 refused to do so.

12 554. On November 13, 2024, when Professor Astor tried to file a complaint,
13 he discovered UCLA had no place to report time, place, and manner violations via
14 their website nor were there instructions on how to report. Professor Astor called
15 Vice Chancellor Beck’s executive assistant, and even she was surprised to learn no
16 reporting mechanism existed on the website. Because there was no location to
17 report, Professor Astor was instructed to email his complaint and photos of the
18 research talk disruption to the executive assistant to pass along to Vice Chancellor
19 Beck.

20 555. After weeks of no response, Professor Astor then directly contacted
21 Vice Chancellor Beck, who was in charge of handling time, place, and manner
22 violations, to follow up on his complaint sent to his executive assistant. Vice
23 Chancellor Beck claimed he never received the complaint and did not know about
24 the disruption. Professor Astor again sent the Vice Chancellor photos documenting
25 the November 8 disruption.

26 556. When Professor Astor asked to speak by phone because he was
27 repeatedly filing reports with no response, Vice Chancellor Beck said he was “not
28 the best person to assist” and was not responsible for the “accountability questions.”

1 This contradicts Vice Chancellor Beck's own admission that he was the one
2 responsible for addressing time, place, and manner violations.

3 557. Despite the fact that the research lecture was formally sponsored by
4 the Luskin school and the University-wide UCLA Dialogue Across Difference
5 Initiative, Vice Chancellor Beck nevertheless advised routing future research
6 lectures through the Events Office for security. Beck's statement misleadingly
7 suggested that the University had not been aware of the presentation, even though
8 it was officially sponsored.

9 558. Separately, after receiving a complaint from the Luskin School Dean
10 regarding the research talk disruption, DPO sent Professor Astor only a generic
11 intake form and a list of counseling resources.

12 559. Thereafter, Professor Astor initiated a call with DPO and spoke with a
13 representative about the research talk disruption. In another follow-up call, a DPO
14 representative noted it generally did not investigate viewpoint discrimination and
15 questioned whether support for Zionism would qualify as a protected religious
16 identity.

17 560. Thereafter, DPO sent a letter indicating it would not investigate the
18 matter.

19 561. Only after the EEOC submitted its Letter of Determination,
20 approximately six months after the research talk, did UCLA decide to investigate
21 the research talk disruption.

22 562. Months later, Professor Astor was informed that the lead SJP disruptor
23 at the research talk was scheduled to have a hearing by the Office of the Dean of
24 Students. Although Professor Astor was initially invited and willing to testify at the
25 hearing, the Chair ultimately refused to allow his testimony on the day of the
26 hearing because he had not provided written confirmation, despite the fact that he
27 had already confirmed his attendance by phone.

28 563. In December 2024, during finals, antizionist and antisemitic flyers,

1 depicting dead Palestinians and accusing Israel of genocide, were posted throughout
2 the Luskin School in violation of time, place, and manner rules. *See supra* ¶¶ 31–
3 34.

4 564. After Professor Astor reported these flyers to the Provost Michael
5 Levine, Dean Anastasia Loukaitou-Sideris, and Vice Chancellor Beck, they failed
6 enforce the original time, place, and manner rules and instead modified the rules to
7 allow the flyers to stay on bulletin boards.

8 565. Even though addressing time, place, and manner violations was Vice
9 Chancellor Beck’s responsibility, instead of asking Facilities Management to
10 remove the flyers himself he instead only suggested that someone else call and
11 request their removal.

12 566. Between the research talk disruption and the antisemitic flyers
13 incident, on November 22, 2024, Dr. Astor filed an EEOC charge alleging hostile
14 work environment, disparate treatment based on religion and national origin, and
15 retaliation in violation of Title VII.

16 567. Following this filing, UCLA emailed all department faculty about
17 preserving emails, unnecessarily indicating Dr. Astor had filed an antisemitism
18 discrimination charge and exposing him to retaliation.

19 568. In December 2024, another member of the SJP, who was part of the
20 research talk disruption, submitted a broad FOIA request targeting Professor Astor’s
21 research project asking for the details about Professor Mona Khoury, student
22 researchers, funders, and all other information about the research project. This was
23 a clear effort to boycott, divest, and sanction against any Israel research and cultural
24 exchanges with UCLA. During the November 8 disruption, protestors specifically
25 conveyed these goals.

26 569. In response, Professor Astor had a meeting with Provost Michael
27 Levine, Dean Anastasia Loukaitou-Sideris expressing his concerns that the FOIA
28 request fell under to important exemptions: 1) it could cause harm to participants,

1 and 2) it was an unpublished research project. As context for his concern, one of
2 Professor Astor’s Principals was assassinated in his research project in Israel.
3 Additionally, another Principal had his car and home firebombed. Given this,
4 Professor Astor has serious concerns about research participants’ exposure and
5 safety. Both the Provost and Dean agreed that UCLA should support academic
6 freedom and refuse the FOIA request due to the exemptions and clear BDS intent.

7 570. However, when Professor Astor and his attorneys met with the UCLA
8 FOIA lawyers expressing the same concerns and requesting an exemption, UCLA
9 refused. Ultimately, UCLA released sensitive data to the FOIA requester, despite
10 concerns and the exemption, explaining not doing so would cause UCLA potential
11 harm.

12 571. UCLA failed to protect Professor Astor by requiring him to search for
13 and produce hundreds of documents in response to the FOIA request, despite the
14 fact that the research project was exempt from disclosure because it was
15 unpublished and because releasing any identifying information risked severe harm,
16 even death, to its participants in Israel. By forcing Professor Astor to respond to the
17 FOIA request, UCLA interfered with his research and academic freedom, and
18 imposed a substantial burden, which contributed to an already hostile work
19 environment.

20 572. Between March and April 2025, Dr. Astor emailed UCLA
21 administrators detailing the University’s failure to provide security, enforce TPM
22 rules, or issue consequences for the November 8, 2024, research talk disruption.
23 UCLA declined to protect his Israel-based research project from informal Boycott,
24 Divestment, and Sanctions (“BDS”) efforts against Israel and required disclosure of
25 sensitive unpublished research materials despite prior exemption assurances.

26 573. Professor Astor also raised concerns about biased evaluation and
27 promotion processes, given that many faculty on the evaluation committees had
28 signed open letters, participated in events, and openly supported union demands that

1 included research and academic boycotts of any projects related to Israel or Israeli
2 Universities or Professors.

3 574. Because a significant portion of Professor Astor’s research involves
4 partnerships with Israeli institutions, the participation of faculty who publicly
5 endorsed and participated in events that encouraged academic BDS undermines any
6 assurance of an objective and impartial evaluation of his work. Even if external
7 reviewers are used to avoid this bias problem, the evaluation and promotion process
8 still requires an anonymous department-wide vote by all of the faculty of equal or
9 higher rank, even those excluded for potential bias. Thus, an external review does
10 not resolve the bias problem because the final, anonymous vote for or against the
11 promotion or merit increase is still made by the same biased faculty. The University
12 has no policy, procedure, or remedy to prevent such bias from occurring.

13 575. Given the sustained activism, protests, and BDS-related targeting
14 directed at Dr. Astor, it is unreasonable to expect that faculty can objectively assess
15 Professor Astor’s work. Furthermore, pro-Palestinian faculty suggested, *see supra*
16 ¶ 360, that Jewish Zionists who signed the Judea Pearl Letter should be excluded
17 from evaluating other faculty. Consequently, Dr. Astor is now in a position where
18 he can neither evaluate colleagues nor be fairly evaluated himself due to the
19 antisemitic bias held by other faculty members.

20 576. In May or June 2025, a death threat from an SJP member was made
21 against a Jewish faculty colleague because of her Jewish/Zionist identity. The
22 student was excluded from campus for two weeks and then reinstated. Due to safety
23 concerns, the Jewish faculty member requested to work from home for the
24 remainder of the year. That faculty member, as well as Professor Astor and Professor
25 Holloway, chose not to attend the 2025 graduation ceremony due to safety concerns
26 related to this death threat.

27 577. In late 2024 through 2025, a trustee managing a donor gift contacted
28 Professor Astor regarding a bequest of approximately \$400,000 to \$460,000 for the

1 Luskin School, left by his deceased mother who was a UCLA social work graduate
2 and proud Jewish woman.

3 578. Given events at the Luskin School since October 7, 2023, the trustee
4 formally requested that the funds honor her legacy by supporting Jewish-focused
5 initiatives: Dr. Astor’s Israel-Jewish/Palestinian youth peace project, his California
6 K-12 anti-bias work, and \$100,000 specifically for research examining whether art,
7 music, food, and photography depicting diverse Jewish communities and
8 celebrations could positively impact student attitudes toward Jews on campus. The
9 trustee pointed to successful similar programs at UC San Diego and Columbia
10 University and requested that Dr. Astor lead the study.

11 579. Professor Astor met several times with the Luskin School Dean and
12 development directors to discuss the donation and the trustee’s proposal on research
13 about art depicting positive Jewish life.

14 580. The Dean denied the research proposal, asking Dr. Astor how he would
15 feel about a similar exhibit on Palestinian culture. Professor Astor found this
16 comparison troubling given the proposal mentioned only Jewish customs and
17 diversity worldwide, not Israel.

18 581. When Dr. Astor questioned whether \$100,000 would be refused for
19 comparable research on other ethnic or cultural groups, the Dean claimed she would
20 disallow such research for any group and therefore the denial was not antisemitic.
21 Administrators then suggested redirecting the \$100,000 to non-research entities like
22 Hillel or, alternatively, redistributing it to existing research categories (the Amal
23 Jewish-Arab dialogue program and K-12 antisemitism work).

24 582. This refusal to permit research using art and diversity to assess the
25 impact of positive Jewish campus events and activities, research that is Dr. Astor’s
26 primary function, was antisemitic in nature. It also deprived both Dr. Astor and the
27 trustee of the academic freedom normally afforded researchers when donors
28 designate funds for specific projects.

1 583. Ultimately, in October 2025, the first installment of approximately
2 \$250,000 was received and allocated to the Amal program and K-12 anti-bias work
3 rather than the donor's requested research on Jewish diversity and positive Jewish
4 life events. Another approximately \$210,000 is expected this year, yet
5 administrators have again restricted these pending funds to the existing two
6 projects, directly impinging Dr. Astor's ability to conduct research that is important
7 to his research agenda, and conflicts with a Jewish donor wishes. This
8 discriminatory restriction remains ongoing.

9 584. Dr. Astor filed a charge of discrimination with the EEOC. On May 23,
10 2025, the EEOC issued a Letter of Determination finding reasonable cause to
11 believe that since at least October 7, 2023, UCLA subjected Dr. Astor to an unlawful
12 hostile work environment based on race/ethnicity (Jewish), perceived or actual
13 national origin/ethnicity (Israeli/Jewish), and/or religion (Judaism), and retaliation
14 for engaging in protected activity, in violation of Title VII. *See* Exhibit G.

15 **EXHAUSTION OF ADMINISTRATIVE REMEDIES**

16 585. Plaintiffs timely filed charges against Defendants with the Equal
17 Employment Opportunity Commission.

18 586. The EEOC made its determination and completed conciliation as
19 required by 42 U.S.C. § 2000e-5(b).

20 587. Thereafter, on March 11, 2026, all seven Plaintiffs were issued right-
21 to-sue letters pursuant to 42 U.S.C. § 2000e-5(f)(1). *See* Exhibit H (right-to-sue
22 letters as to Dr. Stein, Dr. Burt, Dr. Hoftman, Director Blenner, and Dr. Astor).

23 588. The right-to-sue letters issued to Dr. Holloway and Dr. Shamsa were
24 subsequently rescinded on March 12, 2026. Unlike the other plaintiffs named in this
25 complaint, because Dr. Holloway and Dr. Shamsa were named plaintiffs in the U.S.
26 Department of Justice's Complaint pending before this Court in Case No. 2:26-cv-
27 01946. Accordingly, right-to-sue letters are unnecessary as to Dr. Holloway and Dr.
28 Shamsa because Section 2000e-5(f)(1) contemplates the necessity of a right-to-sue

1 letter only when the Attorney General has not filed suit on an aggrieved person's
2 behalf. *See* 42 U.S.C. § 2000e-5(f)(1). Specifically, when
3 the Attorney General has not filed a civil action in a case
4 involving a government, governmental agency, or political
5 subdivision, or the Commission has not entered into a
6 conciliation agreement to which the person aggrieved is a
7 party, the Commission, or the Attorney General in a case
8 involving a government, governmental agency, or political
9 subdivision, shall so notify the person aggrieved and
10 within ninety days after the giving of such notice a civil
11 action may be brought against the respondent named in the
12 charge

13 42 U.S.C. § 2000e-5(f)(1).

14 589. Accordingly, all Plaintiffs have complied with, and exhausted, all
15 administrative remedies, and now seek a trial in this district court de novo.

16 **CLAIMS FOR RELIEF**

17 **Count I**

18 **42 U.S.C. § 2000e-2(a)**

19 **Title VII of the Civil Rights Act of 1964 – Hostile Work Environment**

20 590. Plaintiffs incorporate by reference the allegations set forth in the
21 preceding paragraphs.

22 591. Title VII prohibits employment discrimination based on race, color,
23 religion, sex, and national origin. Title VII gives employees a private cause of
24 action against their employer.

25 592. Under Title VII, a hostile work environment exists when the workplace
26 is permeated with discrimination, intimidation, ridicule, and insult that is
27 sufficiently pervasive to alter the conditions of the victim’s employment and create
28 an abusive working environment.

1 593. UCLA knowingly fostered and tolerated an environment against
2 Jewish faculty.

3 594. This hostile work environment included, but was not limited to, a form
4 of anti-Jewish hate – antizionism – that was used to deny Jewish self-determination,
5 portray Jewish identity as illegitimate or harmful, justify exclusion and boycotts of
6 Jewish faculty, and retaliate against Plaintiffs for speaking out against antisemitism.
7 In this setting, antizionist rhetoric and conduct targeted Jews uniquely and
8 collectively, transforming what UCLA characterized as political discourse into
9 discrimination against Plaintiffs as Jews, a protected class under Title VII.

10 595. UCLA knew or should have known of the antisemitic harassment and
11 hostile work environment and failed to take prompt and effective remedial action.
12 Despite notice to administrators and departmental leadership, UCLA permitted the
13 unlawful conduct to continue, thereby ratifying and perpetuating the hostile work
14 environment in violation of Title VII.

15 596. This conduct was severe and pervasive, altered the terms, conditions,
16 and privileges of Plaintiffs’ employment, and created a hostile work environment
17 that would have interfered with the ability of a reasonable Jewish employee to
18 perform professional duties free from intimidation, exclusion, and identity-based
19 hostility.

20 597. Plaintiffs each reported this discrimination to UCLA administrators, to
21 their leaders within their departments, including deans, assistant deans, department
22 chairs, and vice chancellors. But the antisemitism and discrimination did not stop.

23 598. As a direct and proximate result of Defendants’ violation of Title VII,
24 Plaintiffs have suffered severe emotional distress, anguish, humiliation and
25 emotional pain and suffering. Therefore, Plaintiffs are entitled to recover
26 compensatory damages for past and future non-pecuniary losses, emotional distress,
27 anguish, pain, suffering, humiliation and loss of enjoyment of life, as well as pre-
28 judgment and post-judgment interest. For those Plaintiffs who have been

1 constructively discharged, they also request backpay and front pay as permitted by
2 applicable law.

3 **Count II**

4 **42 U.S.C. § 2000e-3(a)**

5 **Title VII of the Civil Rights Act of 1964 – Retaliation**

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

8 600. Title VII also makes it unlawful for an employer to take a negative
9 action, or to retaliate, against a person because they complained about
10 discrimination.

11 601. All Plaintiffs engaged in protected activity by complaining about
12 antisemitic discrimination to UCLA administrators, filing formal complaints, and
13 participating in efforts to document and address antisemitism at UCLA and
14 participate in other efforts to oppose conduct that they reasonably perceived to
15 violate Title VII. In response, all Plaintiffs suffered materially adverse employment
16 actions.

17 602. Dr. Stein repeatedly complained of antisemitism through formal and
18 informal channels, including complaints to UCLA leadership. In retaliation, Dr.
19 Stein was suspended from teaching duties, targeted by a petition for her removal,
20 and remains excluded from her prior position, including exclusion from core
21 responsibilities and professional standing while the University has taken no steps to
22 correct the reputational harm it has caused her.

23 603. Upon information and belief, Dr. Stein’s Jewish identity and her
24 leadership in the Jewish Faculty Resilience Group in opposing antisemitic
25 discrimination at UCLA were substantial motivating factors in this ongoing
26 retaliatory and disparate treatment.

27 604. Dr. Burt raised concerns about antisemitic content through appropriate
28 channels. In retaliation, Dr. Burt had her professional responsibilities reduced, was

1 subjected to heightened monitoring, and was ultimately constructively discharged.

2 605. Dr. Hoftman reported antisemitic incidents to DGSOM leadership and
3 spoke publicly about antisemitism at UCLA. In retaliation, Dr. Hoftman was
4 accused of policy violations for documenting antisemitic conduct, was publicly
5 attacked for his advocacy, and was blamed for negative perceptions of the
6 institution.

7 606. Professor Shamsa complained of antisemitism in writing to senior
8 UCLA administrators, including the Chancellor. In retaliation, Professor Shamsa
9 was denied a leadership position he had effectively performed for years, subjected
10 to increased billing requirements resulting in significant salary reduction, and
11 forced to relocate from his office.

12 607. Dr. Holloway filed multiple formal complaints documenting
13 antisemitic discrimination. In retaliation, Dr. Holloway was publicly accused of bias
14 in personnel matters, excluded from departmental activities, had his professional
15 reputation damaged, and was effectively forced to transfer departments with
16 resulting pay cuts and loss of funding.

17 608. Director Blenner served on UCLA's Task Force to Combat
18 Antisemitism and filed a formal DPO complaint. In retaliation, Director Blenner's
19 participation on the Task Force was discouraged, her teaching responsibilities were
20 reduced, she was systematically excluded from departmental activities, and she was
21 denied a promotion.

22 609. Professor Astor filed DPO complaints, an abusive conduct complaint,
23 and an EEOC charge regarding antisemitic discrimination. In retaliation, Professor
24 Astor's complaints were ignored or closed without investigation, his research
25 activities were disrupted without institutional response, and he was exposed to
26 further targeting after filing his EEOC charge, which UCLA unnecessarily emailed
27 all department faculty about.

28

1 belief, her identity as a Jew was and continues to be a substantial motivating factor
2 in this disparate treatment.

3 616. Dr. Burt was, and continues to be, treated differently from her similarly
4 situated non-Jewish colleagues in numerous respects, including but not limited to
5 being subjected to a professional boycott, having her responsibilities reduced, and
6 being subjected to monitoring requirements not imposed on similarly situated non-
7 Jewish faculty. The EEOC found reasonable cause to believe UCLA subjected Dr.
8 Burt to different terms and conditions of employment based on her Jewish identity.
9 Upon information and belief, her identity as a Jew was and continues to be a
10 substantial motivating factor in this disparate treatment.

11 617. Dr. Hoftman was, and continues to be, treated differently from his
12 similarly situated non-Jewish colleagues in numerous respects, including but not
13 limited to being warned about policy violations for documenting antisemitic
14 conduct while the antisemitic conduct itself went unaddressed. The EEOC found
15 reasonable cause to believe UCLA subjected Dr. Hoftman to an unlawful hostile
16 work environment based on his Jewish identity. Upon information and belief, his
17 identity as a Jew was and continues to be a substantial motivating factor in this
18 disparate treatment.

19 618. Professor Shamsa was, and continues to be, treated differently from his
20 similarly situated non-Jewish colleagues in numerous respects, including but not
21 limited to being denied a leadership position, being subjected to compensation
22 reductions, and being required to relocate his office while similarly situated peers
23 were not. The EEOC found reasonable cause to believe UCLA subjected Professor
24 Shamsa to denial of promotion and different terms and conditions of employment
25 based on his Jewish identity. Upon information and belief, his identity as a Jew was
26 and continues to be a substantial motivating factor in this disparate treatment.

27 619. Dr. Holloway was, and continues to be, treated differently from his
28 similarly situated non-Jewish colleagues in numerous respects, including but not

1 limited to being excluded from personnel matters, having his professional judgment
2 questioned, being effectively forced to transfer departments and ultimately
3 constructively discharged while faculty who engaged in discriminatory conduct
4 faced no consequences. The EEOC found reasonable cause to believe UCLA
5 subjected Dr. Holloway to an unlawful hostile work environment and retaliation
6 based on his Jewish identity. Upon information and belief, his identity as a Jew was
7 and continues to be a substantial motivating factor in this disparate treatment.

8 620. Director Blenner was, and continues to be, treated differently from her
9 similarly situated non-Jewish colleagues in numerous respects, including but not
10 limited to being asked to assure students she would not discriminate against them,
11 having her teaching responsibilities reduced, being systematically excluded from
12 departmental activities, and being denied promotion. The EEOC found reasonable
13 cause to believe UCLA subjected Director Blenner to an unlawful hostile work
14 environment based on her Jewish identity. Upon information and belief, her identity
15 as a Jew was and continues to be a substantial motivating factor in this disparate
16 treatment.

17 621. Professor Astor was, and continues to be, treated differently from his
18 similarly situated non-Jewish colleagues in numerous respects, including but not
19 limited to having his complaints closed without proper investigation, having his
20 research activities disrupted without proper institutional response, and being
21 subjected to burdensome document requests. The EEOC found reasonable cause to
22 believe UCLA subjected Professor Astor to an unlawful hostile work environment
23 and retaliation based on his Jewish identity. Upon information and belief, his
24 identity as a Jew was and continues to be a substantial motivating factor in this
25 disparate treatment.

26 622. As a direct and proximate result of this disparate treatment in violation
27 of Title VII, Plaintiffs have suffered severe emotional distress, anguish, humiliation
28 and emotional pain and it has taken away from their time, attention, and focus on

1 their teaching and research. Therefore, Plaintiffs are entitled to recover
2 compensatory damages for past and future non-pecuniary losses, emotional distress,
3 anguish, pain, suffering, humiliation and loss of enjoyment of life, as well as pre-
4 judgment and post-judgment interest. For those Plaintiffs who have suffered
5 constructive discharge based on this disparate treatment, they also request back pay
6 and front pay as permitted by applicable law.

7 **Count IV**

8 **Cal. Gov. Code § 12940 et seq.**

9 **California Fair Employment & Housing Act (“FEHA”) – Discrimination**
10 **Based Upon National Origin & Religion**

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

13 624. California Government Code § 12940(a) makes it unlawful
14 employment practice for any employer to, on the basis of national origin or
15 “religious creed,” discriminate against a person in compensation or in terms,
16 conditions, or privileges of employment.

17 625. Moreover, FEHA protects an employee against unlawful
18 discrimination with respect not only to ultimate employment actions such as
19 termination or demotion, but also the entire spectrum of employment actions that
20 are reasonably likely to adversely or materially affect an employee’s job
21 performance or opportunity for advancement in his career.

22 626. FEHA also imposes a negligence standard for harassment by an
23 employee other than an agent or supervisor. When an employer knows or should
24 have known of offensive conduct, the employer will be deemed to have adopted the
25 offending conduct and its results quite as if they had been authorized affirmatively
26 as the employer’s policy. *State Dep’t of Health Servs. v. Sup. Ct.*, 31 Cal. 4th 1026,
27 1041 (2003). This same negligence standard applies to harassment by
28 nonemployees, including students. An employer may be liable where it knows or

1 should have known of the conduct and fails to take immediate and appropriate
2 corrective action. Cal. Gov't Code § 12940(j)(1).

3 627. Defendants violated this prohibition by discriminatory acts or
4 omissions based upon Plaintiffs' national origin or religion or both when, since
5 October 7, 2023, Plaintiffs have been subjected to antisemitic comments, actions,
6 harassment, events, encampments, signs, symbols, graffiti, protests, chants, letters,
7 lectures, social media, and inaction, including failures to investigate, failures to
8 discipline, and failures to protect, that, especially in light of Hamas' terrorist attacks,
9 are sufficiently pervasive to adversely or materially affect the conditions of
10 Plaintiff's employment or opportunity for advancement. Much of this conduct was
11 directed or controlled by Defendants, or allowed by them.

12 628. As alleged more fully above, the EEOC issued a Letter of
13 Determination for each Plaintiff finding that Defendants had created a racially
14 hostile work environment for each of them. (A true and correct copy of these Letters
15 of Determination are attached as Exhibits).

16 629. By virtue of the fact that Defendants and each of them, were aware of
17 the discrimination against Plaintiffs because they are Jewish as alleged above, and
18 repeatedly ignored Plaintiffs' objections and complaints about the racially hostile
19 work environment, Defendants are liable to Plaintiffs for creating a racially hostile
20 workplace in violation of FEHA.

21 630. Defendants also failed to investigate complaints of the racial
22 harassment which actually occurred, giving rise to an independent cause of action
23 under FEHA for failing to investigate complaints of racial harassment.

24 631. As a direct and proximate result of Defendants' violation of FEHA,
25 Plaintiffs have suffered emotional distress, anguish, humiliation and emotional pain
26 and suffering, and has taken away from their time, attention, and focus on their
27 teaching and research. Therefore, the Plaintiffs are entitled to recover compensatory
28

1 damages for past and future non-pecuniary losses, emotional distress, anguish, pain,
2 suffering, humiliation and loss of enjoyment of life.

3 **Count V**

4 **Cal. Gov. Code § 12940 *et seq.***

5 **California FEHA – Harassment Based Upon National Origin & Religion**

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

8 633. California Government Code § 12940(j) makes it unlawful
9 employment practice for any employer to harass an employee on the basis of
10 national origin or religious creed.

11 634. Defendants violated this prohibition against harassment based upon
12 Plaintiffs’ national origin or religion or both when, since October 7, 2023, Plaintiffs
13 have been inundated with antisemitic comments, actions, harassment, events,
14 encampments, signs, symbols, graffiti, protests, chants, letters, lectures, social
15 media, and inaction, including failures to investigate, failures to discipline, and
16 failures to protect, that, especially in light of Hamas’ terrorist attacks, are
17 sufficiently pervasive to adversely or materially affect the conditions of Plaintiff’s
18 employment or opportunity for advancement. Much of this conduct was directed
19 or controlled by Defendants, or allowed by them.

20 635. As a direct and proximate result of Defendants’ violation of FEHA,
21 Plaintiffs have suffered emotional distress, anguish, humiliation and emotional pain
22 and suffering, and has taken away from their time, attention, and focus on their
23 teaching and research. Therefore, the Plaintiffs are entitled to recover compensatory
24 damages for past and future non-pecuniary losses, emotional distress, anguish, pain,
25 suffering, humiliation and loss of enjoyment of life.

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Count VI

Cal. Gov. Code § 12940 *et seq.*

California FEHA – Failure to Prevent Discrimination, and/or Harassment

636. Plaintiffs incorporate by reference the allegations set forth in the preceding paragraphs.

637. California Government Code § 12940(k) makes it unlawful employment practice for an employer to fail to take all reasonable steps necessary to prevent discrimination and harassment from occurring.

638. Defendants violated this section by failing to prevent the discrimination and harassment, or by failing to enforce their own policies to prevent the discrimination and harassment, as outlined in the allegations above.

639. As a direct and proximate result of Defendants’ violation of FEHA, Plaintiffs have suffered emotional distress, anguish, humiliation and emotional pain and suffering, and has taken away from their time, attention, and focus on their teaching and research. Therefore, the Plaintiffs are entitled to recover compensatory damages for past and future non-pecuniary losses, emotional distress, anguish, pain, suffering, humiliation and loss of enjoyment of life.

640. Defendants, through their supervisors’ participation and knowledge, intentionally engaged in the above-described racial harassment with malice and/or reckless indifference to California law. Additionally, Defendants’ supervisors intentionally or recklessly disregarded numerous objections and verbal complaints from the Plaintiffs about the racial harassment and the racially hostile work environment. Accordingly, Plaintiffs are entitled to an award of punitive damages against Defendants. Plaintiffs seek relief as set forth below.

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

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Count VII

**Retaliation in Violation of California’s Fair Employment and Housing Act –
California Government Code § 12940(h)**

642. Plaintiffs incorporate by reference the allegations set forth in the preceding paragraphs.

643. FEHA prohibits “any employer, labor organization, employment agency, or person to discharge, expel, or otherwise discriminate against any person because the person has opposed any practices forbidden under this part or because the person has filed a complaint, testified, or assisted in any proceeding under this part.” Cal. Gov. Code § 12940(h). By “this part,” the statute includes racial harassment.

644. Plaintiffs engaged in the protected activities by making formal complaints concerning the racially hostile work environment to, among other people, Defendants’ management and supervisors, as is set forth more fully above.

645. As detailed above, in a relatively short time period after Plaintiffs lodged complaints about racial harassment against Defendants, Defendants took retaliatory actions against Plaintiffs.

646. As a direct and proximate result of Defendants’ violation of FEHA, Plaintiffs have suffered emotional distress, anguish, humiliation and emotional pain and suffering, and has taken away from their time, attention, and focus on their teaching and research. Therefore, the Plaintiffs are entitled to recover compensatory damages for past and future non-pecuniary losses, emotional distress, anguish, pain, suffering, humiliation and loss of enjoyment of life.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request that the Court:

- A. Declare that Defendants have violated Title VII of the Civil Rights Act of 1964, and California Government Code § 12940 (“FEHA”), as set forth above.

- 1 B. Award Plaintiffs compensatory and nominal damages for the loss of
- 2 their rights under federal and state law, as well as back pay and front
- 3 pay for those who have suffered constructive discharge.
- 4 C. Further, absent injunctive and declaratory relief against Defendants,
- 5 Plaintiffs will continue to be harmed by Defendants' actions. Therefore,
- 6 Plaintiffs request this Court (1) issue preliminary and permanent
- 7 injunctive relief prohibiting Defendants' discrimination of Plaintiffs in
- 8 violation of Plaintiffs' statutory rights, and (2) order and enjoin
- 9 Defendants to enforce Defendants' policies to prevent discrimination
- 10 of Plaintiffs in violation of Plaintiffs' statutory rights, and to enact
- 11 policies to protect Plaintiffs' statutory rights.
- 12 D. Award Plaintiffs the costs of this action and reasonable attorneys' fees
- 13 pursuant to 42 U.S.C. § 2000e-5(k) and Cal. Gov't Code § 12965(b).
- 14 E. Award such other and further relief as the Court deems equitable and
- 15 just.

DEMAND FOR A JURY TRIAL

16 Plaintiff hereby demands a trial by jury on all issues so triable.

17 Respectfully submitted on April 14, 2026.

18

19

20 By: /s/ John B. Thomas

21 John B. Thomas (Bar No. 269538)

22 Bradley A. Benbrook (Bar No.

23 177786)

24 **HICKS THOMAS LLP**

25 1301 Dove Street, 5th Floor

26 Newport Beach, CA 92660

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CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of April 2026, I caused the foregoing document to be electronically transmitted to the Clerk’s Office using the CM/ECF System for Filing, which will send notice of such filing to all registered CM/ECF users.

/s/ John B. Thomas _____

*Attorneys for Prospective Intervenor
Plaintiffs*

EXHIBIT A



**U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
Los Angeles District Office**

255 E. Temple Street, 4th Floor
Los Angeles, CA 90012
Intake Information Group: (800) 669-4000
Intake Information Group TTY: (800) 669-6820
Los Angeles Direct Dial: (213) 785-3090
FAX (213) 894-1118
Website: www.eeoc.gov

EEOC Charge No.: 555-2025-00280

Dr. Kira Stein



Charging Party

Regents of the University of California
1111 Franklin St.
Oakland, CA 94607

Respondent

University of California, Los Angeles
405 Hilgard Avenue
Los Angeles, CA 90095

UCLA Health
200 UCLA Medical Plaza
Los Angeles, CA 90095

c/o Kelly Wood, Counsel
O'Melveny & Myers LLP
610 Newport Center Drive 17th Floor
Newport Beach, CA 92660-6429

LETTER OF DETERMINATION

I issue the following determination as to the merits of the charge for the Regents of the University of California [University of California, Los Angeles (“UCLA”) and UCLA Health].

Respondent is an employer within the meaning of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000-e et. seq. (“Title VII”). Timeliness and all requirements for coverage have been met.

Charging Party alleged that Respondent subjected her to discrimination and a hostile work environment based on race/ethnicity, national origin and religion (Jewish), in violation of Title VII. Charging Party further alleged that other employees within his same protected categories also experienced a hostile work environment and discrimination due to their membership in those same protected categories.

Respondent denies the allegations.

Examination of the evidence obtained in the Commission’s investigation, including but not limited to, documents, testimony, and on-site inspection/interviews, supports a finding that there is

Letter of Determination
EEOC Charge No.: 555-2025-00280
Page 2

reasonable cause to believe that since at least October 7, 2023, and continuing to the present, UCLA and UCLA Health subjected Charging Party to an unlawful hostile work environment and different terms and conditions of employment based on race/ethnicity (Jewish), perceived or actual national origin/ethnicity (Israeli/Jewish), and/or religion (Judaism), in violation of Title VII.

The Commission has also determined that there is reasonable cause to believe that since at least October 7, 2023, employees working at UCLA and UCLA Health were discriminated against and subjected to an unlawful hostile work environment based on race/ethnicity (Jewish), perceived or actual national origin/ethnicity (Israeli/Jewish), and/or religion (Judaism), in violation of Title VII.

Respondent is reminded that Federal law prohibits retaliation against persons who have exercised their right to inquire or complain about matters they believe may violate the law. Discrimination against persons who have cooperated in EEOC investigations is also prohibited. These protections apply regardless of the EEOC's determination on the merits of the charge.

Upon finding that there is reason to believe that violations have occurred, the Commission attempts to eliminate the alleged unlawful practices by informal methods of conciliation (i.e., settlement). Therefore, the Commission now invites the parties to join with it in reaching a just resolution of this matter as it relates to UCLA and UCLA Health.

When the Respondent declines to enter into conciliation discussions, or when the Commission's representative for any reason is unable to secure a settlement acceptable to the Commission, the Commission shall so inform the parties in writing and advise them of the court enforcement alternative available to the parties and the Commission. The confidentiality provisions of the statute and Commission Regulations apply to information discussed or given during conciliation.

On Behalf of the Commission:

PATRICIA KANE

Digitally signed by PATRICIA KANE
Date: 2025.06.25 11:04:16 -07'00'

(FOR)

_____ Date

_____ Christine Park-Gonzalez, District Director
Los Angeles District Office

EXHIBIT B



**U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
Los Angeles District Office**

255 E. Temple Street, 4th Floor
Los Angeles, CA 90012
Intake Information Group: (800) 669-4000
Intake Information Group TTY: (800) 669-6820
Los Angeles Direct Dial: (213) 785-3090
FAX (213) 894-1118
Website: www.eeoc.gov

EEOC Charge No.: 555-2025-00279

Vivien Burt



Charging Party

Regents of the University of California
1111 Franklin St.
Oakland, CA 94607

Respondent

University of California, Los Angeles
405 Hilgard Avenue
Los Angeles, CA 90095

UCLA Health
200 UCLA Medical Plaza
Los Angeles, CA 90095

c/o Kelly Wood, Counsel
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610 Newport Center Drive 17th Floor
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LETTER OF DETERMINATION

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Respondent is an employer within the meaning of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000-e et. seq. (“Title VII”). Timeliness and all requirements for coverage have been met.

Charging Party alleged that Respondent subjected her to discrimination and a hostile work environment based on race/ethnicity, national origin and religion (Jewish), in violation of Title VII. Charging Party further alleged that other employees within his same protected categories also experienced a hostile work environment and discrimination due to their membership in those same protected categories.

Respondent denies the allegations.

Examination of the evidence obtained in the Commission’s investigation, including but not limited to, documents, testimony, and on-site inspection/interviews, supports a finding that there is

Letter of Determination
EEOC Charge No.: 555-2025-00279
Page 2

reasonable cause to believe that since at least October 7, 2023, and continuing to the present, UCLA and UCLA Health subjected Charging Party to an unlawful hostile work environment and different terms and conditions of employment based on race/ethnicity (Jewish), perceived or actual national origin/ethnicity (Israeli/Jewish), and/or religion (Judaism), in violation of Title VII.

The Commission has also determined that there is reasonable cause to believe that since at least October 7, 2023, employees working at UCLA and UCLA Health were discriminated against and subjected to an unlawful hostile work environment based on race/ethnicity (Jewish), perceived or actual national origin/ethnicity (Israeli/Jewish), and/or religion (Judaism), in violation of Title VII.

Respondent is reminded that Federal law prohibits retaliation against persons who have exercised their right to inquire or complain about matters they believe may violate the law. Discrimination against persons who have cooperated in EEOC investigations is also prohibited. These protections apply regardless of the EEOC's determination on the merits of the charge.

Upon finding that there is reason to believe that violations have occurred, the Commission attempts to eliminate the alleged unlawful practices by informal methods of conciliation (i.e., settlement). Therefore, the Commission now invites the parties to join with it in reaching a just resolution of this matter as it relates to UCLA and UCLA Health. If you wish to participate in conciliation, please email Susan Ha, Lead Systemic Investigator, at Susan.Ha@eeoc.gov.

When the Respondent declines to enter into conciliation discussions, or when the Commission's representative for any reason is unable to secure a settlement acceptable to the Commission, the Commission shall so inform the parties in writing and advise them of the court enforcement alternative available to the parties and the Commission. The confidentiality provisions of the statute and Commission Regulations apply to information discussed or given during conciliation.

On Behalf of the Commission:

5/23/2025

Date



Christine Park-Gonzalez, District Director
Los Angeles District Office

EXHIBIT C



**U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
Los Angeles District Office**

255 E. Temple Street, 4th Floor
Los Angeles, CA 90012
Intake Information Group: (800) 669-4000
Intake Information Group TTY: (800) 669-6820
Los Angeles Direct Dial: (213) 785-3090
FAX (213) 894-1118
Website: www.eeoc.gov

EEOC Charge No.: 555-2025-00308

Nir Hoftman

Charging Party

[Redacted]
[Redacted]

Regents of the University of California
1111 Franklin St.
Oakland, CA 94607

Respondent

University of California, Los Angeles
405 Hilgard Avenue
Los Angeles, CA 90095

UCLA Health
200 UCLA Medical Plaza
Los Angeles, CA 90095

c/o Kelly Wood, Counsel
O'Melveny & Myers LLP
610 Newport Center Drive 17th Floor
Newport Beach, CA 92660-6429

LETTER OF DETERMINATION

I issue the following determination as to the merits of the charge for the Regents of the University of California [University of California, Los Angeles ("UCLA") and UCLA Health].

Respondent is an employer within the meaning of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000-e et. seq. ("Title VII"). Timeliness and all requirements for coverage have been met.

Charging Party alleged that Respondent subjected him to a hostile work environment based on race/ethnicity, national origin, and religion (Jewish), in violation of Title VII. Charging Party further alleged that other employees within his same protected categories also experienced a hostile work environment due to their membership in those same protected categories.

Respondent denies the allegations.

Examination of the evidence obtained in the Commission's investigation, including but not limited to, documents, testimony, and on-site inspection/interviews, supports a finding that there is reasonable cause to believe that since at least October 7, 2023, and continuing to the present, UCLA

Letter of Determination
EEOC Charge No.: 555-2025-00308
Page 2

and UCLA Health subjected Charging Party to an unlawful hostile work environment based on race/ethnicity (Jewish), perceived or actual national origin/ethnicity (Israeli/Jewish), and/or religion (Judaism), in violation of Title VII.

Examination of the evidence obtained in the Commission's investigation, including but not limited to, documents, testimony, and on-site inspection/interviews, supports a finding that there is reasonable cause to believe that since at least October 7, 2023, employees working at UCLA and UCLA Health were subjected to an unlawful hostile work environment based on race/ethnicity (Jewish), perceived or actual national origin/ethnicity (Israeli/Jewish), and/or religion (Judaism), in violation of Title VII.

Respondent is reminded that Federal law prohibits retaliation against persons who have exercised their right to inquire or complain about matters they believe may violate the law. Discrimination against persons who have cooperated in EEOC investigations is also prohibited. These protections apply regardless of the EEOC's determination on the merits of the charge.

Upon finding that there is reason to believe that violations have occurred, the Commission attempts to eliminate the alleged unlawful practices by informal methods of conciliation (i.e., settlement). Therefore, the Commission now invites the parties to join with it in reaching a just resolution of this matter as it relates to UCLA and UCLA Health. If you wish to participate in conciliation, please email Susan Ha, Lead Systemic Investigator, at Susan.Ha@eoc.gov.

When the Respondent declines to enter into conciliation discussions, or when the Commission's representative for any reason is unable to secure a settlement acceptable to the Commission, the Commission shall so inform the parties in writing and advise them of the court enforcement alternative available to the parties and the Commission. The confidentiality provisions of the statute and Commission Regulations apply to information discussed or given during conciliation.

On Behalf of the Commission:

5/23/2025

Date



Christine Park-Gonzalez, District Director
Los Angeles District Office

EXHIBIT D



**U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
Los Angeles District Office**

255 E. Temple Street, 4th Floor
Los Angeles, CA 90012
Intake Information Group: (800) 669-4000
Intake Information Group TTY: (800) 669-6820
Los Angeles Direct Dial: (213) 785-3090
FAX (213) 894-1118
Website: www.eeoc.gov

EEOC Charge No.: 480-2025-02489

Kamran Shamsa



Charging Party

University of California, Los Angeles
405 Hilgard Avenue
Los Angeles, CA 90095

Respondent

UCLA Health
200 UCLA Medical Plaza
Los Angeles, CA 90095

c/o Kelly Wood, Counsel
O'Melveny & Myers LLP
610 Newport Center Drive 17th Floor
Newport Beach, CA 92660-6429

LETTER OF DETERMINATION

I issue the following determination as to the merits of the charge for the University of California, Los Angeles ("UCLA") and UCLA Health.

Respondent is an employer within the meaning of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000-e et. seq. ("Title VII"). Timeliness and all requirements for coverage have been met.

Charging Party alleged that Respondent subjected him to discrimination and a hostile work environment based on race/ethnicity, national origin (Israeli) and religion (Jewish), and retaliation for engaging in a protected activity, in violation of Title VII. Charging Party further alleged that other employees within his same protected categories also experienced a hostile work environment and discrimination due to their membership in those same protected categories.

Respondent denies the allegations.

Examination of the evidence obtained in the Commission's investigation, including but not limited to documents, testimony, and on-site inspection/interviews, supports a finding that there is reasonable cause to believe that since at least October 7, 2023, UCLA and UCLA Health subjected Charging Party to an unlawful hostile work environment, denial of promotion, and different terms and conditions of employment based on race/ethnicity (Jewish), perceived or actual national origin/ethnicity (Israeli/Jewish), and/or religion (Judaism), in violation of Title VII. Further, the Commission supports a finding that there is reasonable cause to believe that since at least October 7,

Letter of Determination
EEOC Charge No.: 480-2025-02489
Page 2

2023, Charging Party was denied a promotion and subjected to different terms and conditions of employment in retaliation for complaining of discrimination, based on race/ethnicity (Jewish), perceived or actual national origin/ethnicity (Israeli/Jewish), and/or religion (Judaism), in violation of Title VII.

Examination of the evidence obtained in the Commission's investigation, including but not limited to, documents, testimony, and on-site inspection/interviews, supports a finding that there is reasonable cause to believe that since at least October 7, 2023, employees working at UCLA and UCLA Health were discriminated against and subjected to an unlawful hostile work environment, based on race/ethnicity (Jewish), perceived or actual national origin/ethnicity (Israeli/Jewish), and/or religion (Judaism), and retaliation for engaging in protected activity, in violation of Title VII.

Respondent is reminded that Federal law prohibits retaliation against persons who have exercised their right to inquire or complain about matters they believe may violate the law. Discrimination against persons who have cooperated in EEOC investigations is also prohibited. These protections apply regardless of the EEOC's determination on the merits of the charge.

Upon finding that there is reason to believe that violations have occurred, the Commission attempts to eliminate the alleged unlawful practices by informal methods of conciliation (i.e., settlement). Therefore, the Commission now invites the parties to join with it in reaching a just resolution of this matter as it relates to UCLA and UCLA Health. If you wish to participate in conciliation, please email Susan Ha, Lead Systemic Investigator, at Susan.Ha@eoc.gov.

When the Respondent declines to enter into conciliation discussions, or when the Commission's representative for any reason is unable to secure a settlement acceptable to the Commission, the Commission shall so inform the parties in writing and advise them of the court enforcement alternative available to the parties and the Commission. The confidentiality provisions of the statute and Commission Regulations apply to information discussed or given during conciliation.

On Behalf of the Commission:

5/23/2025

Date



Christine Park-Gonzalez, District Director
Los Angeles District Office

EXHIBIT E

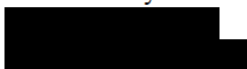


**U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
Los Angeles District Office**

255 E. Temple Street, 4th Floor
Los Angeles, CA 90012
Intake Information Group: (800) 669-4000
Intake Information Group TTY: (800) 669-6820
Los Angeles Direct Dial: (213) 785-3090
FAX (213) 894-1118
Website: www.eeoc.gov

EEOC Charge No.: 555-2025-00281

Ian Holloway



Charging Party

Regents of the University of California
1111 Franklin St.
Oakland, CA 94607

Respondent

University of California, Los Angeles
405 Hilgard Avenue
Los Angeles, CA 90095

c/o Kelly Wood, Counsel
O'Melveny & Myers LLP
610 Newport Center Drive 17th Floor
Newport Beach, CA 92660-6429

LETTER OF DETERMINATION

I issue the following determination as to the merits of the charge for the Regents of the University of California [University of California, Los Angeles (“UCLA”)].

Respondent is an employer within the meaning of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000-e et. seq. (“Title VII”). Timeliness and all requirements for coverage have been met.

Charging Party alleged that Respondent subjected him to a hostile work environment based on race/ethnicity, national origin and religion (Jewish), and retaliation for engaging in a protected activity, in violation of Title VII. Charging Party further alleged that other employees within his same protected categories also experienced a hostile work environment due to their membership in those same protected categories.

Respondent denies the allegations.

Examination of the evidence obtained in the Commission’s investigation, including but not limited to, documents, testimony, and on-site inspection/interviews, supports a finding that there is reasonable cause to believe that since at least October 7, 2023, UCLA subjected Charging Party to an unlawful hostile work environment based on race/ethnicity (Jewish), perceived or actual national origin/ethnicity (Israeli/Jewish), and/or religion (Judaism), and retaliation for engaging in protected activity, in violation of Title VII.

Letter of Determination
EEOC Charge No.: 555-2025-00281
Page 2

The Commission has also determined that there is reasonable cause to believe that since at least October 7, 2023, employees working at UCLA were subjected to an unlawful hostile work environment based on race/ethnicity (Jewish), perceived or actual national origin/ethnicity (Israeli/Jewish), and/or religion (Judaism), and retaliation for engaging in protected activity, in violation of Title VII.

Respondent is reminded that Federal law prohibits retaliation against persons who have exercised their right to inquire or complain about matters they believe may violate the law. Discrimination against persons who have cooperated in EEOC investigations is also prohibited. These protections apply regardless of the EEOC's determination on the merits of the charge.

Upon finding that there is reason to believe that violations have occurred, the Commission attempts to eliminate the alleged unlawful practices by informal methods of conciliation (i.e., settlement). Therefore, the Commission now invites the parties to join with it in reaching a just resolution of this matter as it relates to UCLA. If you wish to participate in conciliation, please email Susan Ha, Lead Systemic Investigator, at Susan.Ha@eeoc.gov.

When the Respondent declines to enter into conciliation discussions, or when the Commission's representative for any reason is unable to secure a settlement acceptable to the Commission, the Commission shall so inform the parties in writing and advise them of the court enforcement alternative available to the parties and the Commission. The confidentiality provisions of the statute and Commission Regulations apply to information discussed or given during conciliation.

On Behalf of the Commission:

5/23/2025

Date



Christine Park-Gonzalez, District Director
Los Angeles District Office

EXHIBIT F



**U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
Los Angeles District Office**

255 E. Temple Street, 4th Floor
Los Angeles, CA 90012
Intake Information Group: (800) 669-4000
Intake Information Group TTY: (800) 669-6820
Los Angeles Direct Dial: (213) 785-3090
FAX (213) 894-1118
Website: www.eeoc.gov

EEOC Charge No.: 555-2025-00398

Sarah Uzan (aka Sarah Blenner)

Charging Party



Regents of the University of California
1111 Franklin St.
Oakland, CA 94607

Respondent

University of California, Los Angeles
405 Hilgard Avenue
Los Angeles, CA 90095

c/o Kelly Wood, Counsel
O'Melveny & Myers LLP
610 Newport Center Drive 17th Floor
Newport Beach, CA 92660-6429

LETTER OF DETERMINATION

I issue the following determination as to the merits of the charge for the Regents of the University of California [University of California, Los Angeles (“UCLA”)].

Respondent is an employer within the meaning of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000-e et. seq. (“Title VII”). Timeliness and all requirements for coverage have been met.

Charging Party alleged that Respondent subjected her to unlawful hostile work environment and discrimination based on race/ethnicity, national origin, religion (Jewish), sex (female), and retaliation for engaging in a protected activity, in violation of Title VII. Charging Party further alleged that other employees within her same protected categories also experienced a hostile work environment due to their membership in those same protected categories.

Respondent denies the allegations.

Examination of the evidence obtained in the Commission’s investigation, including but not limited to documents, testimony, and on-site inspection/interviews, supports a finding that there is reasonable cause to believe that since at least October 7, 2023, UCLA subjected Charging Party to an unlawful hostile work environment based on race/ethnicity (Jewish), perceived or actual national origin/ethnicity (Israeli/Jewish), and/or religion (Judaism), in violation of Title VII.

Letter of Determination
EEOC Charge No.: 555-2025-00398
Page 2

The Commission has also determined that there is reasonable cause to believe that since at least October 7, 2023, employees working at UCLA were subjected to an unlawful hostile work environment based on race/ethnicity (Jewish), perceived or actual national origin/ethnicity (Israeli/Jewish), and/or religion (Judaism), in violation of Title VII. No finding is made with respect to Charging Party's other allegations.

Respondent is reminded that Federal law prohibits retaliation against persons who have exercised their right to inquire or complain about matters they believe may violate the law. Discrimination against persons who have cooperated in EEOC investigations is also prohibited. These protections apply regardless of the EEOC's determination on the merits of the charge.

Upon finding that there is reason to believe that violations have occurred, the Commission attempts to eliminate the alleged unlawful practices by informal methods of conciliation (i.e., settlement). Therefore, the Commission now invites the parties to join with it in reaching a just resolution of this matter as it relates to UCLA. If you wish to participate in conciliation, please email Susan Ha, Lead Systemic Investigator, at Susan.Ha@eoc.gov.

When the Respondent declines to enter into conciliation discussions, or when the Commission's representative for any reason is unable to secure a settlement acceptable to the Commission, the Commission shall so inform the parties in writing and advise them of the court enforcement alternative available to the parties and the Commission. The confidentiality provisions of the statute and Commission Regulations apply to information discussed or given during conciliation.

On Behalf of the Commission:

5/23/2025

Date



Christine Park-Gonzalez, District Director
Los Angeles District Office

EXHIBIT G



**U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
Los Angeles District Office**

255 E. Temple Street, 4th Floor
Los Angeles, CA 90012
Intake Information Group: (800) 669-4000
Intake Information Group TTY: (800) 669-6820
Los Angeles Direct Dial: (213) 785-3090
FAX (213) 894-1118
Website: www.eeoc.gov

EEOC Charge No.: 555-2025-00454

Dr. Ron A. Astor



Charging Party

Regents of the University of California
1111 Franklin St.
Oakland, CA 94607

Respondent

University of California, Los Angeles
405 Hilgard Avenue
Los Angeles, CA 90095

c/o Kelly Wood, Counsel
O'Melveny & Myers LLP
610 Newport Center Drive 17th Floor
Newport Beach, CA 92660-6429

LETTER OF DETERMINATION

I issue the following determination as to the merits of the charge the Regents of the University of California [University of California, Los Angeles (“UCLA”)].

Respondent is an employer within the meaning of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000-e et. seq. (“Title VII”). Timeliness and all requirements for coverage have been met.

Charging Party alleged that Respondent subjected him to an unlawful hostile work environment and different terms and conditions of employment based on race/ethnicity, national origin and religion (Jewish), and retaliation for engaging in a protected activity, in violation of Title VII. Charging Party further alleged that other employees within his same protected categories also experienced a hostile work environment and discrimination due to their membership in those same protected categories.

Respondent denies the allegations.

Examination of the evidence obtained in the Commission’s investigation, including but not limited to, documents, testimony, and on-site inspection/interviews, supports a finding that there is reasonable cause to believe that since at least October 7, 2023, UCLA subjected Charging Party to an unlawful hostile work environment based on race/ethnicity (Jewish), perceived or actual national

Letter of Determination
EEOC Charge No.: 555-2025-00454
Page 2

origin/ethnicity (Israeli/Jewish), and/or religion (Judaism), and retaliation for engaging in protected activity, in violation of Title VII.

The Commission has also determined that there is reasonable cause to believe that since at least October 7, 2023, employees working at UCLA were subjected to an unlawful hostile work environment based on race/ethnicity (Jewish), perceived or actual national origin/ethnicity (Israeli/Jewish), and/or religion (Judaism), and retaliation for engaging in protected activity, in violation of Title VII.

Respondent is reminded that Federal law prohibits retaliation against persons who have exercised their right to inquire or complain about matters they believe may violate the law. Discrimination against persons who have cooperated in EEOC investigations is also prohibited. These protections apply regardless of the EEOC's determination on the merits of the charge.

Upon finding that there is reason to believe that violations have occurred, the Commission attempts to eliminate the alleged unlawful practices by informal methods of conciliation (i.e., settlement). Therefore, the Commission now invites the parties to join with it in reaching a just resolution of this matter as it relates to UCLA. If you wish to participate in conciliation, please email Susan Ha, Lead Systemic Investigator, at Susan.Ha@eeoc.gov.

When the Respondent declines to enter into conciliation discussions, or when the Commission's representative for any reason is unable to secure a settlement acceptable to the Commission, the Commission shall so inform the parties in writing and advise them of the court enforcement alternative available to the parties and the Commission. The confidentiality provisions of the statute and Commission Regulations apply to information discussed or given during conciliation.

On Behalf of the Commission:

5/23/2025

Date



Christine Park-Gonzalez, District Director
Los Angeles District Office

EXHIBIT 2

From: DOJ Civil Rights - Do Not Reply <civilrightsdonotreply@mail.civilrights.usdoj.gov>

Date: Wed, Mar 11, 2026 at 4:49 PM

Subject: Response: Your Civil Rights Division Report - 739564-MJQ from the Employment Litigation Section

To: <[REDACTED]>

U.S. Department of Justice

Civil Rights Division

civilrights.justice.gov

739564-MJQ

NOTICE OF RIGHT TO SUE WITHIN 90 DAYS

Mar 11, 2026

Kira Stein
[REDACTED]

Re: Kira Stein v. University of California, et al.,
EEOC Charge No. 555-2025-00280

Dear Kira Stein,

This notice is in reference to the charge(s) of discrimination identified above, which [was/were] referred to the Department of Justice by the Equal Employment Opportunity Commission (EEOC) after conciliation efforts by the EEOC were unsuccessful. The Department of Justice has determined that it will not file a lawsuit based on the charge(s). The decision not to file a lawsuit is not a determination by the Department of Justice of whether your allegations of discrimination have merit.

Therefore, you are hereby notified that you have a right to file a lawsuit commencing a civil action based on the charge(s) under the following statute(s):

- Title VII of the Civil Rights Act of 1964, 42 USC. 42 U.S.C. § 2000e, et seq.

If you decide to file a lawsuit under the statute(s) identified above, **you must file it in the appropriate court within 90 days of receiving this Notice**. If you haven't already, you may want to consult with a private attorney of your own choosing and expense.

If you have questions or wish to inspect the investigative file pertaining to this matter, please address your inquiry to the following EEOC office: Los Angeles District Office. Contact information for this office can be located at <https://www.eeoc.gov/field-office/losangeles/location>.

Sincerely,

Complaint Referral Unit
Employment Litigation Section
Civil Rights Division

CC: [REDACTED]

Contact

civilrights.justice.gov

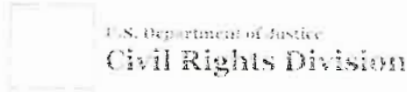
U.S. Department of
Justice
Civil Rights Division
950 Pennsylvania Avenue,
NW
Washington, D.C. 20530-
0001

(202) 514-3847
1-855-856-1247 (toll-
free)
Telephone Device for
the Deaf
(TTY) (202) 514-0716

EXHIBIT 3

DOJ Civil Rights - Do Not Reply <civilrightsdonoreply@mail.civilrights.usdoj.gov>
Reply-To: civilrightsdonoreply@mail.civilrights.usdoj.gov
To: [REDACTED]

Wed, Mar 11, 2026 at 12:36 PM



civilrights.justice.gov

739518-ZKF

NOTICE OF RIGHT TO SUE WITHIN 90 DAYS

Mar 11, 2026

Vivien Burt
[REDACTED]

Re: Vivien Burt v. University of California, et al.,
EEOC Charge No. 555-2025-00279

Dear Vivien Burt,

You are receiving this notice because you filed the above charge(s) with the Equal Employment Opportunity Commission (EEOC), and you or your attorney specifically requested this notice.

Because either 180 days have passed since you filed the above charge(s), or because the EEOC has determined that it will not be able to conclude its administrative process within 180 days of the date it assumed jurisdiction of the charge(s), you are hereby notified that you have the right to file a lawsuit commencing a civil action based on the charge(s) under the following statute(s):

- Title VII of the Civil Rights Act of 1964, 42 USC, 42 U.S.C. § 2000e, et seq.

If you decide to file a lawsuit under the statute(s) identified above, you must file it in the appropriate court within 90 days of receiving this Notice. This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether your charge is meritorious. If you haven't already, you may want to consult with a private attorney of your own choosing and expense.

If you have questions or wish to inspect the investigative file pertaining to this matter, please address your inquiry to the following EEOC office: Los Angeles District Office. Contact information for this office can be located at <https://www.eeoc.gov/field-office/losangeles/location>.


Sincerely,

Complaint Referral Unit
Employment Litigation Section
Civil Rights Division

CC: [REDACTED]

Contact

civilrights.justice.gov

 U.S. Department of Justice
Civil Rights Division
950 Pennsylvania Avenue, NW
Washington, D.C. 20530-0001

 (202) 514-3847
1-855-856-1247 (toll-free)
Telephone Device for the Deaf
(TTY) (202) 514-0716

EXHIBIT 4

From: DOJ Civil Rights - Do Not Reply <civilrightsdonotreply@mail.civilrights.usdoj.gov>
Subject: Response: Your Civil Rights Division Report - 739521-XMG from the Employment Litigation Section
Date: March 11, 2026 at 12:39:56 PM PDT
To: [REDACTED]
Reply-To: civilrightsdonotreply@mail.civilrights.usdoj.gov



739521-XMG

NOTICE OF RIGHT TO SUE WITHIN 90 DAYS

Mar 11, 2026

Nir Hoftman
[REDACTED]

Re: Nir Hoftman v. University of California, et al.,
EEOC Charge No. 555-2025-00308

Dear Nir Hoftman,

This notice is in reference to the charge(s) of discrimination identified above, which [was/were] referred to the Department of Justice by the Equal Employment Opportunity Commission (EEOC) after conciliation efforts by the EEOC were unsuccessful. The Department of Justice has determined that it will not file a lawsuit based on the charge(s). The decision not to file a lawsuit is not a determination by the Department of Justice of whether your allegations of discrimination have merit.

Therefore, you are hereby notified that you have a right to file a lawsuit commencing a civil action based on the charge(s) under the following statute(s):

- Title VII of the Civil Rights Act of 1964, 42 USC, 42 U.S.C. § 2000e, et seq.

If you decide to file a lawsuit under the statute(s) identified above, you must file it in the appropriate court within 90 days of receiving this Notice. If you haven't already, you may want to consult with a private attorney of your own choosing and expense.

If you have questions or wish to inspect the investigative file pertaining to this matter, please address your inquiry to the following EEOC office: Los Angeles District Office. Contact information for this office can be located at <https://www.eeoc.gov/field-office/losangeles/location>.

Sincerely,

Complaint Referral Unit
Employment Litigation Section
Civil Rights Division

CC: [REDACTED]

Contact

civilrights.justice.gov

✉ U.S. Department of Justice
Civil Rights Division
950 Pennsylvania Avenue, NW
Washington, D.C.
20530-0001

☎ (202) 514-3847
1-855-856-1247 (toll-free)
Telephone Device for the Deaf
(TTY) (202) 514-0716

EXHIBIT 5

#316

From: DOJ Civil Rights - Do Not Reply <civilrightsdonotreply@mail.civilrights.usdoj.gov>

Date: Wed, Mar 11, 2026 at 1:05 PM

Subject: Response: Your Civil Rights Division Report - 739532-DPS from the Employment Litigation Section

To: <[REDACTED]>

U.S. Department of Justice
Civil Rights Division

civilrights.justice.gov

739532-DPS

NOTICE OF RIGHT TO SUE WITHIN 90 DAYS

Mar 11, 2026

Sarah Uzan
[REDACTED]

Re: Sarah Uzan v. University of California, et al.,
EEOC Charge No. 555-2025-00398

Dear Sarah Uzan,

This notice is in reference to the charge(s) of discrimination identified above, which [was/were] referred to the Department of Justice by the Equal Employment Opportunity Commission (EEOC) after conciliation efforts by the EEOC were unsuccessful. The Department of Justice has determined that it will not file a lawsuit based on the charge(s). The decision not to file a lawsuit is not a determination by the Department of Justice of whether your allegations of discrimination have merit.

Therefore, you are hereby notified that you have a right to file a lawsuit commencing a civil action based on the charge(s) under the following statute(s):

- Title VII of the Civil Rights Act of 1964, 42 USC. 42 U.S.C. § 2000e, et seq.

If you decide to file a lawsuit under the statute(s) identified above, **you must file it in the appropriate court within 90 days of receiving this Notice.** If you haven't already, you may want to consult with a private attorney of your own choosing and expense.

If you have questions or wish to inspect the investigative file pertaining to this matter, please address your inquiry to the following EEOC office: Los Angeles District Office. Contact information for this office can be located at <https://www.eeoc.gov/field-office/losangeles/location>.

Sincerely,

Complaint Referral Unit
Employment Litigation Section
Civil Rights Division

CC: [REDACTED]

Contact

civilrights.justice.gov

U.S. Department of
Justice
Civil Rights Division
950 Pennsylvania
Avenue, NW
Washington, D.C. 20530-
0001

(202) 514-3847
1-855-856-1247 (toll-
free)
Telephone Device for
the Deaf
(TTY) (202) 514-0716

EXHIBIT 6

From: DOJ Civil Rights - Do Not Reply <civilrightsdonotreply@mail.civilrights.usdoj.gov>
Date: Wed, Mar 11, 2026 at 1:14 PM
Subject: Response: Your Civil Rights Division Report - 739537-SST from the Employment Litigation Section
To: [REDACTED]

U.S. Department of Justice
Civil Rights Division

civilrights.justice.gov

739537-SST

NOTICE OF RIGHT TO SUE WITHIN 90 DAYS

Mar 11, 2026

Ron Astor
[REDACTED]

Re: Ron Astor v. University of California, et al.,
EEOC Charge No. 555-2025-00454

Dear Ron Astor,

This notice is in reference to the charge(s) of discrimination identified above, which [was/were] referred to the Department of Justice by the Equal Employment Opportunity Commission (EEOC) after conciliation efforts by the EEOC were unsuccessful. The Department of Justice has determined that it will not file a lawsuit based on the charge(s). The decision not to file a lawsuit is not a determination by the Department of Justice of whether your allegations of discrimination have merit.

Therefore, you are hereby notified that you have a right to file a lawsuit commencing a civil action based on the charge(s) under the following statute(s):

- Title VII of the Civil Rights Act of 1964, 42 USC. 42 U.S.C. § 2000e, et seq.

If you decide to file a lawsuit under the statute(s) identified above, **you must file it in the appropriate court within 90 days of receiving this Notice**. If you haven't already, you may want to consult with a private attorney of your own choosing and expense.

If you have questions or wish to inspect the investigative file pertaining to this matter, please address your inquiry to the following EEOC office: Los Angeles District Office. Contact information for this office can be located at <https://www.eeoc.gov/field-office/losangeles/location>.

Sincerely,

Complaint Referral Unit
Employment Litigation Section
Civil Rights Division

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10 *Intervenor Plaintiffs*

11 *(Additional counsel listed on following*
12 *Page)*

13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**
15 **WESTERN DIVISION**

16 UNITED STATES OF AMERICA,
17 Plaintiff,
18 vs.
19 REGENTS OF THE UNIVERSITY OF
20 CALIFORNIA,
21 Defendant.

Case No.: 2:26-CV-01946

[PROPOSED] ORDER
GRANTING MOTION TO
INTERVENE AS PLAINTIFFS

Hearing Date: May 18, 2026
Hearing Time: 10:00 a.m.
Court: Judge Christina A. Snyder

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1 The motion of Prospective Intervenor Plaintiffs, Kira Stein, Vivien Burt, Nir
2 Hoftman, Ian Holloway, Sarah Blenner, Kamran Shamsa, and Ron Avi Astor
3 (“Intervenor Plaintiffs”), requesting an order granting intervention as Plaintiffs and
4 to file a Complaint came for hearing before this Court on _____.
5 _____ appeared for Intervenor-
6 Plaintiffs. _____ appeared for Plaintiff and
7 _____ appeared for Defendant.

8 After consideration of the briefs and arguments of counsel, and all matters
9 presented to the Court,

10 IT IS HEREBY ORDERED that Intervenor-Plaintiffs’ Motion to Intervene
11 as Plaintiffs is GRANTED.

12 Petitioner-Intervenors may file the complaint attached hereto as Exhibit “A”
13 to the Declaration of _____ in Support of Motion to Intervene.

14 IT IS SO ORDERED.

15 DATED: _____

16
17 _____
18 Honorable Christina A. Snyder
19 United States District Court Judge
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