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 Center for Legal Justice

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8 UNITED STATES DISTRICT COURT  
 9 CENTRAL DISTRICT OF CALIFORNIA

11 STANDWITHUS CENTER FOR  
 LEGAL JUSTICE,  
 12  
 Plaintiff,  
 13  
 14 v.  
 15 CODEPINK, PALESTINIAN  
 YOUTH MOVEMENT, and WESPAC  
 16 FOUNDATION,  
 17 Defendants.

Case No.:

**COMPLAINT FOR:**

- 1) Threatening and Intimidating Persons in Violation of 18 U.S.C. § 248(a)(2)
- 2) Threatening and Intimidating Persons in Violation of Cal. Pen. Code § 423.2
- 3) Threatening and Intimidating Persons in Violation of 18 U.S.C. § 248(a)(2)
- 4) Threatening and Intimidating Persons in Violation of 18 U.S.C. § 248(a)(2)

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1 Plaintiff StandWithUs Center for Legal Justice (“Plaintiff” or “SCLJ”)  
2 alleges as follows:

3  
4 **INTRODUCTION**

5 1. Bear-sprayed worshippers. Jews assaulted, intimidated, and  
6 threatened. Bloodied members of the Jewish community whose only  
7 transgressions were to attend synagogue. The images that emerged from the  
8 antisemitic riot outside Adas Torah synagogue (“Adas Torah”) on June 23, 2024,  
9 are outrageous.

10  
11  
12 2. Deplorably, those images also are no longer surprising.

13 3. Indeed, they are emblematic of an increasingly common occurrence:  
14 organized riots that violently target the American Jewish community.

15  
16 4. On June 23, individuals organized by Defendants Code Pink,  
17 Palestinian Youth Movement, and WESPAC Foundation (collectively,  
18 “Defendant Organizations”) terrorized Jewish congregants outside their house of  
19 worship, blocking access to those seeking religious services and trapping others  
20 inside.

21  
22 5. Outside, Jewish worshippers were bear-sprayed, assaulted,  
23 intimidated, and threatened.

24  
25 6. This violence forcibly halted multiple daily *minyanim* (prayer  
26 services) and Torah study sessions.

27  
28 7. Defendant Organizations’ violent riot also prevented congregants

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1 from attending an event that, as elaborated on below, not only involved prayer but  
2 also sought to educate Jewish congregants about housing opportunities in Israel  
3 that would fulfill the religious commandment to “make *Aliyah*,” or immigrate to  
4 Israel.  
5

6 8. The event is referred to henceforth as the *Aliyah* Event.<sup>1</sup>

7  
8 9. Appreciating the repugnance inherent in forcibly preventing the  
9 faithful from worship, Congress created a statutory mechanism to punish those  
10 who would inflict this harm and to enjoin them from ever doing it again.  
11

12 10. Specifically, the federal FACE Act, 18 U.S.C. § 248, ensures that  
13 worshippers may practice their respective religions free from persecution,  
14 interference, and intimidation.  
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18 <sup>1</sup> *Aliyah* comes from the Hebrew word for “rise” or “ascent”:

The term *Aliyah*, going up to Israel, is used in Genesis in reference to our forefather Jacob’s bones being brought from Egypt to what would be the Land of Israel: “And Joseph returned to Egypt, he and his brothers, and all **who had gone up with him** to bury his father, after he had buried his father.” Genesis 50:14. The Talmudic sages state that the Land of Israel is higher than all other lands. (Talmud Bavli, Kiddushin, 69a) This is not meant in a topographical sense, for clearly this is not the case. Rather, it means that the Holy Land is the most suitable place to relate and connect to the Almighty, and the primary location to lovingly engage in the observance of G-d’s commandments. In other words, to go there is to be elevated, to go up to a higher level.

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25 *What is “Aliyah”?*, CHABAD.ORG,  
26 [chabad.org/library/article\\_cdo/aid/1584066/jewish/What-Is-Aliyah.htm](https://chabad.org/library/article_cdo/aid/1584066/jewish/What-Is-Aliyah.htm) (last  
27 visited July 21, 2024); *see also Mitzvah to Live in Israel*, AISH,  
28 [https://aish.com/mitzvah-to-live-in-  
israel/#:~:text=The%20mitzvah%20to%20live%20in,Come%22%20\(Ketuvot%20111a\)](https://aish.com/mitzvah-to-live-in-israel/#:~:text=The%20mitzvah%20to%20live%20in,Come%22%20(Ketuvot%20111a)) (last visited July 21, 2024). As described below, ‘making *Aliyah*’, and even preparing to make *Aliyah*, is considered by many Jewish people to be a fulfillment of one of the most important religious commandments in the Torah.

1 11. California has enacted a materially identical statute. *See* Cal. Pen.  
2 Code § 423.2.

3  
4 12. Having violated both, Defendant Organizations are liable for  
5 statutory damages and should be subject to appropriate injunctive relief to prevent  
6 them from ever violating the federal or California FACE Acts again.

7  
8 **JURISDICTION AND VENUE**

9 13. This Court has jurisdiction under 28 U.S.C. §§ 1331 and 1343, which  
10 confer original jurisdiction on federal district courts to hear suits alleging the  
11 violation of rights and privileges under acts of Congress.

12  
13 14. This action, based on a violation of SCLJ’s rights under the FACE  
14 Act, is brought under 18 U.S.C. § 248(c)(1)(A), which provides that “[a]ny person  
15 aggrieved by reason of the conduct prohibited by subsection (a) may commence a  
16 civil action.”

17  
18 15. This Court has supplemental jurisdiction over SCLJ’s California  
19 FACE Act claims because these state-law claim are “so related to [the] claims in  
20 [this] action within” the Court’s “original jurisdiction that [it] form[s] part of the  
21 same case or controversy.” 28 U.S.C. § 1367.

22  
23  
24 16. Venue is proper in this district under 28 U.S.C. § 1391(b), because a  
25 substantial part of the events giving rise to SCLJ’s claims occurred in the Pico-  
26 Robertson neighborhood of Los Angeles, California, which is in this District.  
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**PARTIES**

1  
2 17. SCLJ is a tax-exempt membership organization organized under the  
3 laws of California.  
4

5 18. SCLJ's membership is composed of individuals from a host of  
6 different communities across the country, including Jewish and/or Israeli  
7 individuals who share SCLJ's dedication to combating antisemitism through legal  
8 action.  
9

10 19. SCLJ includes congregants from Adas Torah and members of the Los  
11 Angeles Jewish community who registered to go to Adas Torah on June 23, 2024,  
12 for organized Jewish activities, and/or who regularly attend religious services  
13 there.  
14

15 20. SCLJ Member #1 is a Jewish resident of Los Angeles who sought to  
16 attend the Aliyah Event at the time of the riot.  
17

18 21. SCLJ Member #2 is a Jewish resident of Los Angeles who sought to  
19 attend the Aliyah Event, as well as a religious service, at the time of the riot.  
20

21 22. SCLJ Member #3 is a Jewish resident of Los Angeles who sought to  
22 attend the Aliyah Event, as well as a religious service, at the time of the riot.  
23

24 23. SCLJ Member #4 is a Jewish resident of Los Angeles who sought to  
25 attend the Aliyah Event, as well as a religious service, at the time of the riot.  
26

27 24. SCLJ Member #5 is a Jewish resident of Los Angeles who sought to  
28 attend the Aliyah Event, as well as a religious service, at the time of the riot.

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1           25. SCLJ Member #6 is a Jewish resident of Los Angeles, as well as a  
2 member of Adas Torah, who was studying Torah at the synagogue at the time of  
3 the riot.  
4

5           26. SCLJ Member #7 is a Jewish resident of Los Angeles, as well as a  
6 member of Adas Torah, who sought to attend the afternoon prayer services at the  
7 time of the riot.  
8

9           27. During the riot, SCLJ members sought “to exercise the First  
10 Amendment right of religious freedom at a place of religious worship,” namely  
11 Adas Torah, but were forcefully prevented from doing so.  
12

13           28. Specifically, on June 23, 2024, at approximately 1:30 p.m. local time,  
14 over two-hundred rioters, organized by Defendant Organizations and joined by  
15 their members, blocked SCLJ members’ access to Adas Torah, where a series of  
16 religious services and study sessions were taking place, along with the Aliyah  
17 Event.  
18

19           29. Defendant CodePink (“CodePink”) is a non-profit entity with Section  
20 501(c)(3) tax-exempt status in the United States.  
21

22           30. CodePink describes itself as a “feminist grassroots organization  
23 working to end U.S. warfare and imperialism, support peace and human rights  
24 initiatives, and redirect resources into healthcare, education, green jobs and other  
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1 life-affirming[] programs.”<sup>2</sup>

2 31. Contrary to that description, CodePink has long supported terrorists  
3 and terrorist entities, including Iran, the largest state-sponsor of terror; Ansar Allah  
4 (also known as the “Houthis”),<sup>3</sup> which was previously designated a Foreign  
5 Terrorist Organization; and Hamas.<sup>4</sup>

6  
7  
8 32. Each of these terrorist entities has called for the annihilation of the  
9 Jewish people.

10 33. Members of CodePink have attended a conference in Iran with  
11 Holocaust deniers, and they have met with Hamas officials “several times.”<sup>5</sup>

12 34. Defendant WESPAC Foundation (“WESPAC”) is a Section 501(c)(3)  
13 organization with its principal place of business in White Plains, New York.

14 35. WESPAC is the fiscal sponsor of Defendant Palestinian Youth  
15 Movement (“PYM”).<sup>6</sup>

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20 <sup>2</sup> *What is CODEPINK?*, CODEPINK, <https://www.codepink.org/about> (last visited July 12, 2024).

21 <sup>3</sup> Haley Strac, *Another Defense of Terrorism from Code Pink*, NAT’L REVIEW (Jan. 16, 2024), <https://www.nationalreview.com/corner/another-defense-of-terrorism-from-code-pink/>.

22 <sup>4</sup> CODEPINK Staff, *CODEPINK Women Travel To Gaza TODAY To Witness Damage*  
23 *And Demand A Lifting Of The Blockade; Plan To Meet With Women’s Groups, Hamas Officials*,  
24 CODEPINK (Jan. 29, 2009) [https://www.codepink.org/official\\_release\\_codepink\\_women\\_travel\\_to\\_gaza\\_today\\_to\\_witness\\_damage\\_and\\_demand\\_a\\_lifting\\_of\\_the\\_blockade\\_plan\\_to\\_meet\\_with\\_women\\_s\\_groups\\_hamas\\_officials](https://www.codepink.org/official_release_codepink_women_travel_to_gaza_today_to_witness_damage_and_demand_a_lifting_of_the_blockade_plan_to_meet_with_women_s_groups_hamas_officials).

25 <sup>5</sup> James Reinl, *Hard-Left Activists Code Pink’s History Of Israel-Bashing Revealed: Anti-War Feminist Group That’s Under Congressional Scrutiny Over Ties To Chinese Communist Party Has A Record Of Links To Iran, Hamas And ‘Antisemitism’*, DAILY MAIL (Dec. 23, 2023, 7:11 AM), <https://www.dailymail.co.uk/news/article-12797043/Codepink-antisemitic-left-war-congress-Iran-Hamas-Israel.html>.

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27  
28 <sup>6</sup> *Palestinian Youth Movement Profile*, NGO MONITOR (June 2, 2024), <https://www.ngo-monitor.org/ngos/palestinian-youth->



1 36. PYM is an unincorporated association without a formal principal  
2 place of business or publicly identified leadership structure.

3  
4 37. PYM regularly justifies terror attacks against Jewish persons and has  
5 expressed public support for members of U.S.-designated Foreign Terrorist  
6 Organizations.

7  
8 38. PYM’s latest campaign of terrorizing Jewish people outside Adas  
9 Torah mirrors its previous activities.

10 39. For instance, PYM recently helped organize a conference, titled the  
11 People’s Conference for Palestine (the “Conference”), which involved multiple  
12 speakers who are affiliated with Foreign Terrorist Organizations.

13  
14 40. One such speaker was Sana Daqqah, the Conference’s keynote  
15 speaker and wife of Walid Daqqah, a Popular Front for the Liberation of Palestine  
16 terrorist convicted of the kidnapping, torture, and murder of Israeli Moshe  
17 Tamam.<sup>7</sup>

18  
19  
20 41. One PYM organizer at the Conference, Sarah Abdelshamy, celebrated  
21 the terror attacks of October 7, 2023, while speaking on a panel: “In the past eight  
22 months, we’ve seen incredible images of victory—from witnessing the families of  
23 political prisoners reunite with, and embrace their loved ones for the first time in

24  
25  
26 \_\_\_\_\_  
27 movement/#:~:text=WESPAC%20Foundation%20serves%20as%20the,amounts%20disbursed  
%20for%20PYM%20activities.

28 <sup>7</sup> Michael Starr, *Rashida Tlaib attends conference honoring terrorists, hosting terrorist speaker*, JERUSALEM POST (May 26, 2024), <https://www.jpost.com/international/article-803703>.

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1 years—to scenes of our heroic people breaking down the siege that has suffocated  
2 the Gaza Strip for 17 years.”<sup>8</sup>

3  
4 42. PYM often collaborates with the organization National Students for  
5 Justice in Palestine (“NSJP”)—another of WESPAC’s fiscal sponsorships—that is  
6 now being sued in the wake of the October 7 attacks in the U.S. District Court for  
7 the Eastern District of Virginia for providing material support to Hamas and other  
8 Foreign Terrorist Organizations.<sup>9</sup>

9  
10 43. Upon information and belief, members of PYM were among those  
11 who blocked access to Adas Torah on June 23, 2024.

12  
13 44. PYM operates as a fiscal sponsorship of WESPAC, meaning  
14 WESPAC collects and disburses donations on PYM’s behalf because PYM lacks  
15 tax-exempt status.<sup>10</sup>

16  
17 45. The IRS requires fiscal sponsors to retain “control and discretion as to  
18 the use of the funds and maintain[] records establishing that the funds were used  
19 for section 501(c)(3) purposes.”<sup>11</sup>

20  
21  
22  
23 <sup>8</sup> *Id.*

24 <sup>9</sup> See Complaint for Damages and Jury Trial Demand, *Parizer v. AJP Educational*  
*Foundation Inc.*, No. 1:24cv724 (E.D. Va.).

25 <sup>10</sup> *Palestinian Youth Movement Profile*, NGO MONITOR (June 2, 2024),  
26 [https://www.ngo-monitor.org/ngos/palestinian-youth-](https://www.ngo-monitor.org/ngos/palestinian-youth-movement/#:~:text=WESPAC%20Foundation%20serves%20as%20the,amounts%20disbursed%20for%20PYM%20activities.)  
27 [movement/#:~:text=WESPAC%20Foundation%20serves%20as%20the,amounts%20disbursed%20for%20PYM%20activities.](https://www.ngo-monitor.org/ngos/palestinian-youth-movement/#:~:text=WESPAC%20Foundation%20serves%20as%20the,amounts%20disbursed%20for%20PYM%20activities.)

28 <sup>11</sup> 1968 IRB LEXIS 179, \*1 (I.R.S. July 1, 1968); see also *National Foundation v. United States*,  
13 Cl. Ct. 486, 87-2 USTC para. 9602 (1987).

1 46. Thus, as the fiscal sponsor of PYM, WESPAC is responsible for how  
2 PYM uses its funds.

3  
4 47. Consequently, WESPAC is responsible for the promotion and  
5 funding that resulted in the violent riot that blocked the entrance to Adas Torah.

6 **LEGAL STANDARD**

7  
8 48. The FACE Act imposes civil and criminal penalties on any person  
9 who “by force or threat of force or by physical obstruction, intentionally injures,  
10 intimidates or interferes with or attempts to injure, intimidate or interfere with any  
11 person lawfully exercising or seeking to exercise the First Amendment right of  
12 religious freedom at a place of religious worship.” 18 U.S.C. § 248(a)(2).

13  
14 49. The FACE Act also imposes civil and criminal penalties on any person  
15 who “intentionally damages or destroys the property of a place of religious  
16 worship.” *Id.* § 248(a)(3).

17  
18 50. The FACE Act creates a private right of action: “Any person  
19 aggrieved by reason of the conduct prohibited by subsection (a) may commence a  
20 civil action for the relief set forth in subparagraph (B).” *Id.* § 248(c)(1)(A).

21  
22 51. The FACE Act authorizes courts to “award appropriate relief,  
23 including temporary, preliminary or permanent injunctive relief and compensatory  
24 and punitive damages, as well as the costs of suit and reasonable fees for attorneys  
25 and expert witnesses.” *Id.* § 248(c)(1)(B).  
26  
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1           52.    “With respect to compensatory damages, the plaintiff may elect, at  
2 any time prior to the rendering of final judgment, to recover, in lieu of actual  
3 damages, an award of statutory damages in the amount of \$5,000 per violation.” *Id.*

4  
5           53.    The California FACE Act, Cal. Pen. Code § 423.2, provides a similar  
6 cause of action: “Every person who . . . [b]y force, threat of force, or physical  
7 obstruction that is a crime of violence, intentionally injures, intimidates, interferes  
8 with, or attempts to injure, intimidate, or interfere with a person lawfully  
9 exercising or seeking to exercise the First Amendment right of religious freedom at  
10 a place of religious worship,” violates the California FACE Act. Cal. Pen. Code  
11 § 423.2(b).

12  
13  
14           54.    Finally, “[e]very person who . . . [i]ntentionally damages or destroys  
15 the property of a place of religious worship,” violates the California FACE Act. *Id.*  
16 § 423.2(f).

17  
18           55.    Section 423.4 of the California Penal Code provides that “[a] person  
19 aggrieved by a violation of” the California FACE Act “may bring a civil action to  
20 enjoin the violation, for compensatory and punitive damages, and for the costs of  
21 suit and reasonable fees for attorneys and expert witnesses,” so long as the plaintiff  
22 is either a person “lawfully exercising or seeking to exercise the First Amendment  
23 right of religious freedom in a place of religious worship, or the entity that owns or  
24 operates a place of religious worship.” *Id.* § 423.4(a).

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1 56. And “[w]ith respect to compensatory damages, the plaintiff may elect,  
2 at any time prior to the rendering of a final judgment, to recover, in lieu of actual  
3 damages, an award of statutory damages in the amount of one thousand dollars  
4 (\$1,000) per exclusively nonviolent violation, and five thousand dollars (\$5,000)  
5 per any other violation, for each violation committed.” *Id.*  
6

7  
8 57. Actual damages may exceed the \$1,000 or \$5,000 statutory-damage  
9 amounts contemplated by the federal and state FACE Acts.  
10

11 **STATEMENT OF FACTS**

12 58. On June 23, 2024, more than two-hundred rioters, organized by  
13 Defendant Organizations, marched into the predominantly orthodox Jewish  
14 neighborhood of Pico-Robertson in Los Angeles’s Westside and blocked access to  
15 Adas Torah.  
16

17 59. Many of those rioters were armed with various weapons, including  
18 bear-spray.  
19

20 60. The rioters prevented worshippers (including members of SCLJ) from  
21 attending regularly scheduled afternoon prayers at Adas Torah.  
22

23 61. By stoking such unrest and engaging in physical violence, members of  
24 Defendant Organizations made it impossible for members of Adas Torah to  
25 practice their religion free from persecution, intimidation, and violence.  
26

27 62. As discussed below, the riot Defendant Organizations planned  
28 violated both the federal and state FACE Acts.

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**Adas Torah’s Services on June 23, 2024.**

63. In the days before June 23, 2024, a real estate company called My Home in Israel, which specializes in assisting American Jews buy homes in Israel, announced the *Aliyah* Event, which was to be held at Adas Torah.<sup>12</sup>

64. This event was scheduled for June 23, 2024.

65. Although outsiders have characterized the Adas Torah event as a “mere” housing or real estate event, it was anything but that.

66. For many in the Orthodox Jewish community, the event—and others like it— which educate people about the realities of making Aliyah, represents a key aspect of an integral part of Jewish religious observance.

67. Many members of the Jewish community believe that their faith includes a religious commandment (“*mitzvah*”) to buy land in their ancestral homeland of Israel and to dwell there.<sup>13</sup>

68. In fact, the Sages of the Talmudic era were clear that the commandment to settle the land, which specifically includes buying a home in Israel (*see, e.g.,* Babylonian Talmud Gittin 8b) “is equivalent to all of the other commandments in the Torah.” (Sifrei, Re’eh, 53).

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<sup>12</sup> MY HOME IN ISRAEL, <https://homeinIsrael-il.com/> / (last visited July 24, 2024).

<sup>13</sup> *See, e.g.,* Babylonian Talmud, Ketubot 110b; Numbers 33:53; Deuteronomy 11:31.; *see also Mitzvah to Live in Israel*, AISH, [https://aish.com/mitzvah-to-live-in-israel/#:~:text=The%20mitzvah%20to%20live%20in,Come%22%20\(Ketuvot%2011a](https://aish.com/mitzvah-to-live-in-israel/#:~:text=The%20mitzvah%20to%20live%20in,Come%22%20(Ketuvot%2011a)) (last visited July 12, 2024).

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1 69. Moving to Israel, thereby fulfilling this religious commandment, is  
2 known as “making *Aliyah*.”

3  
4 70. The preparations to make *Aliyah* (including educating oneself about  
5 the options for doing so, and then buying a home) are also considered at least a  
6 partial fulfillment of the commandment.<sup>14</sup>

7  
8 71. The specific commandment to buy a home in Israel is so special that it  
9 may even override certain other commandments.<sup>15</sup>

10 72. Indeed, this commandment merits its own discussions in the Talmudic  
11 and rabbinic sources.<sup>16</sup>

12  
13 73. This is why events like the *Aliyah Event* are often held in synagogues  
14 and often include some form of prayer or Torah study—because it is generally  
15 understood by the community for which such events are intended that these are *not*  
16 just “real estate events” and are, in fact, manifestly religious in nature.

17  
18 74. In other words, had Defendant Organizations’ mob allowed the *Aliyah*  
19 Event to proceed, attendance by members of the community would have fulfilled  
20 an important religious commandment for those seeking to learn more about or to  
21 fulfill the *mitzvah* of *Aliyah*.  
22  
23

24 \_\_\_\_\_  
25 <sup>14</sup> See Peninei Halakha, Shabbat 9:12 (citing Ramban (Nachmanides) on Babylonian  
26 Talmud Shabbat 130b); Rivash §387; see also Artzot Ha’Chaim, p. 2 (discussing how every  
step on the way is a separate fulfillment of a commandment).

27 <sup>15</sup> See Babylonian Talmud, Bava Kamma 80b.

28 <sup>16</sup> See, i.e., Babylonian Talmud, Gittin 8b, Shulchan Aruch (Code of Jewish Law), Orach  
Chayim 306:11.

1 75. For most attendees and potential attendees, attendance at this event, or  
2 any such *Aliyah* Event, would constitute a lawful exercise of their First  
3 Amendment right of religious freedom.  
4

5 76. Simultaneously, on the day and time of the *Aliyah* Event, Adas Torah  
6 was also hosting multiple afternoon prayer services, or *minyanim*, as well as Torah  
7 study sessions.  
8

9 77. These prayer services are held every day.

10 78. Around thirty to forty people, including members of SCLJ, regularly  
11 attend the 1:30 pm *minyanim*.  
12

13 **Defendant Organizations Call Rioters to Assemble Outside Adas Torah.**

14 79. Upon learning of the *Aliyah* Event, Defendant Organizations called on  
15 their members to assemble outside Adas Torah based on the lie that Adas Torah  
16 was hosting an event that encouraged its congregants to “steal” Palestinian land.  
17

18 80. Upon information and belief, these dishonest social media posts were  
19 designed to generate the most possible outrage.  
20

21 81. For instance, on June 20, 2023, the People’s City Council–Los  
22 Angeles, a Los Angeles-based “[a]bolitionist, anti-capitalist & anti-imperialist  
23 collective,” posted on X a statement reading: “OUR LAND IS NOT FOR SALE!  
24 This Sunday, 6/23, a real estate event will be marketing homes in ‘anglo  
25  
26  
27  
28



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1 neighborhoods’ in effort to further occupy Palestine[.] Racist settler expansionists  
2 arent [sic] welcome in LA! Join us @ 12 PM- 9040 W Pico Blvd.”<sup>17</sup>

3  
4 82. Other organizations, including Defendant Organizations, followed  
5 suit.

6 83. On Friday, June 21, 2024, CodePink’s Los Angeles and Southeast Los  
7 Angeles chapters issued a collaborative post<sup>18</sup> on Instagram claiming that “A  
8 MEGA ZIONIST REAL ESTATE EVENT IS IN LA THIS WEEK!”<sup>19</sup>

9  
10 84. The post featured multiple slides, including a slide that urged: “HELP  
11 US ADVOCATE THE STOP OF HOMES BEING SOLD ON STOLEN  
12 PALESTINIAN LAND!”<sup>20</sup>

13  
14 85. The call to assemble included the dates and addresses of two events—  
15 one in North Hollywood on June 20 and the second at Adas Torah on June 23.<sup>21</sup>

16  
17  
18  
19  
20  
21 <sup>17</sup> @PplsCityCouncil, X (June 20, 2024, 7:26 PM),  
22 [https://x.com/PplsCityCouncil/status/1803932341875937685?ref\\_src=twsrc%5Etfw%7Ctwcamp%5Etweetembed%7Ctwterm%5E1803932341875937685%7Ctwgr%5Ee52cce6315c004ed398fbd50753fe57fb520d5c2%7Ctwcon%5Es1\\_&ref\\_url=https%3A%2F%2Fforward.com%2Ffast-forward%2F626491%2Ffa-synagogue-adas-torah-protest-palestinians-israel%2F](https://x.com/PplsCityCouncil/status/1803932341875937685?ref_src=twsrc%5Etfw%7Ctwcamp%5Etweetembed%7Ctwterm%5E1803932341875937685%7Ctwgr%5Ee52cce6315c004ed398fbd50753fe57fb520d5c2%7Ctwcon%5Es1_&ref_url=https%3A%2F%2Fforward.com%2Ffast-forward%2F626491%2Ffa-synagogue-adas-torah-protest-palestinians-israel%2F)

23  
24 <sup>18</sup> A collaborative post is one that both accounts agree to have appear on their respective  
25 profiles. See HUBSPOT, *How to Collab Post on Instagram as a Brand or Creator [Steps + Tips]*,  
<https://blog.hubspot.com/marketing/instagram-collab-post> (last visited July 5, 2024).

26 <sup>19</sup> CODEPINK Southeast Los Angeles (@codepinksela) & CODEPINK Los Angeles  
27 (@codepinkla), INSTAGRAM, [https://www.instagram.com/p/C8c6f8dyplb/?img\\_index=1](https://www.instagram.com/p/C8c6f8dyplb/?img_index=1) (last  
28 visited July 3, 2024).

<sup>20</sup> *Id.*

<sup>21</sup> *Id.*

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1 86. The dates and addresses were placed inside inverted red triangles.<sup>22</sup>

2 See Exhibit A.

3  
4 87. Since October 7, 2023, Hamas and its supporters on social media have  
5 used inverted red triangles as a symbol for Hamas and to celebrate its use of  
6 violence against Jews and Israelis.

7  
8 88. In other words, the inverted red triangle acts as a target designator to  
9 identify Jews and Jewish targets for extermination.<sup>23</sup>

10  
11 89. Also, on June 21, 2024, PYM posted a slide on its Instagram, calling  
12 for members to show up at “12 PM SHARP” and declaring “OUR LAND IS NOT  
13 FOR SALE.”<sup>24</sup>

14  
15 90. The slide continues: “STAND AGAINST SETTLER EXPANSION  
16 AT SUNDAY’S REAL ESTATE EVENT SELLING HOMES TO BUILD  
17 ‘ANGLO NEIGHBORHOODS’ IN PALESTINE.”<sup>25</sup>

18  
19 91. The caption beneath the slide states: “Racist settler expansionists are  
20 not welcome in Los Angeles! This blatant example of land theft is operating in our  
21 own backyard. The Nakba<sup>[26]</sup> is ongoing and must be confronted!”

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

25 <sup>23</sup> <https://extremismterms.adl.org/glossary/inverted-red-triangle>

26 <sup>24</sup> PYM LA-OC-IE (@pymlaocie) & Palestinian Youth Movement  
27 (@palestinianyouthmovement), INSTAGRAM,  
<https://www.instagram.com/p/C8dActZyjil/?igsh=d3o3eWw3OTZrZjkh> (last visited July 3,  
2024).

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

<sup>26</sup> PYM LA-OC-IE (@pymlaocie) & Palestinian Youth Movement

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1 92. It concludes: “FROM THE BELLY OF THE BEAST[.] NO  
2 JUSTICE, NO PEACE.”<sup>27</sup>

3  
4 93. Upon information and belief, the phrase “BELLY OF THE BEAST”  
5 refers to a synagogue, a place where Jews congregate to pray.

6 **Defendant Organizations Riot Outside Adas Torah.**

7  
8 94. On Sunday, June 23, 2024, organized by Defendant Organizations and  
9 others, more than two-hundred rioters (upon information and belief) descended to  
10 the streets surrounding Adas Torah.

11  
12 95. Chaos and violence ensued right after.

13 96. Specifically, the rioters drawn to Adas Torah by Defendant  
14 Organizations’ calls for action donned masks and signs; threw punches at  
15 synagogue members and Jews who had arrived to provide support for their fellow  
16 worshippers; and engaged in other acts of violence.

17  
18 97. Some rioters were wearing Hamas’s green headbands, chanting  
19 “Intifada,” and calling for indiscriminate violence against Jewish people.<sup>28</sup>  
20  
21  
22

23  
24 \_\_\_\_\_  
25 (@palestiniayouthmovement), INSTAGRAM,  
26 <https://www.instagram.com/p/C8dActZyjiI/?igsh=d3o3eWw3OTZrZjkh> (last visited July 3,  
27 2024). *Nakba* refers to the defeat of the Arab armies in the 1948 war for Israel’s independence  
28 after the Arab armies invaded Israel. *See Nakba*, Jewish Virtual Library,  
<https://www.jewishvirtuallibrary.org/nakba> (last visited July 12, 2024).

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

<sup>28</sup> Summer Lin et al., *More Details Emerge On Protest Outside L.A. Synagogue*,  
YAHOO! NEWS (June 27, 2024, 6:00 AM), <https://au.news.yahoo.com/very-traumatic-medic-describes-things-100038626.html>.

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1 98. Some rioters arrived wearing ski goggles in preparation for the  
2 violence.<sup>29</sup>

3  
4 99. Footage of the violence quickly spread through social media.<sup>30</sup>

5 100. Scenes of blood on the streets, use of bear-spray, and the brandishing  
6 of make-shift weapons (including, among other things, a skateboard), permeated  
7 cyberspace and were reported by dozens of news outlets.  
8

9 101. About sixty police officers were called to the scene to stop the violent  
10 rioters, while many people were treated for their injuries.  
11

12 102. While the riot was raging, worshippers, many of whom are members  
13 of SCLJ, were attempting to enter Adas Torah to attend one or several of the  
14 following: an afternoon prayer session or *minyan*, a Torah study session, and the  
15 *Aliyah* Event.  
16

17 103. SCLJ Member #1 was one of the worshippers who was prevented by  
18 the mob from exercising his constitutionally and statutorily protected free-exercise  
19 rights to attend the *Aliyah* Event.  
20

21 104. SCLJ Member #1 had preregistered to attend the *Aliyah* Event.  
22  
23  
24

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25 <sup>29</sup> Michael Starr, *Anti-Israel Protestors Beat, Bear Mace Jews, Journalists At LA*  
26 *Synagogue*, JERUSALEM POST (June 24, 2024, 2:13 AM), [https://www.jpost.com/breaking-  
news/article-807411](https://www.jpost.com/breaking-news/article-807411).

27 <sup>30</sup> CODEPINK Southeast Los Angeles Chapter (@codepinksela), INSTAGRAM,  
28 [https://www.instagram.com/reel/C8khglxyMw4/?utm\\_source=ig\\_web\\_copy\\_link&igsh=MzRIO  
DBiNWFIZA==](https://www.instagram.com/reel/C8khglxyMw4/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA==) (last visited July 3, 2024).

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1           105. SCLJ Member #1 managed to enter Adas Torah through an alleyway  
2 behind the building, where an armed security guard admitted him into the building.

3  
4           106. SCLJ Member #1 learned of this secret entrance through a WhatsApp  
5 group, though not all attendees of the June 23 events were on the group.

6           107. SCLJ Member #2 was one of the worshippers who was initially  
7 prevented by the mob from exercising her constitutionally and statutorily protected  
8 free-exercise rights to attend both the *Aliyah* Event and an afternoon prayer  
9 service.  
10

11           108. SCLJ Member #2 had preregistered to attend the *Aliyah* Event.

12           109. SCLJ Member #2 managed to enter Adas Torah through an alleyway  
13 behind the building, where an armed security guard admitted her into the building.  
14

15           110. SCLJ Member #2 learned of this secret entrance through a WhatsApp  
16 group, though not all attendees of the June 23 events were on the group.  
17

18           111. SCLJ Member #2 did not find a prayer service available for her to  
19 join.  
20

21           112. SCLJ Member #3 was one of the worshippers who was initially  
22 prevented by the mob from exercising her constitutionally and statutorily protected  
23 free-exercise rights to attend both the *Aliyah* Event and an afternoon prayer  
24 service.  
25

26           113. SCLJ Member #3 had intended to attend the *Aliyah* Event with her  
27 mother.  
28

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1 114. SCLJ Member #3 managed to enter Adas Torah synagogue through an  
2 alleyway behind the building, where an armed security guard admitted her into the  
3 building.  
4

5 115. SCLJ Member #3 learned of this secret entrance through a WhatsApp  
6 group, though not all attendees of the June 23 events were on the group.  
7

8 116. SCLJ Member #3 did not find a prayer service available for her to  
9 join.  
10

11 117. SCLJ Member #4 was one of the worshippers who was initially  
12 prevented by the mob from exercising his constitutionally and statutorily protected  
13 free-exercise rights to attend the *Aliyah* Event and participate in an afternoon  
14 prayer service.  
15

16 118. SCLJ Member #4 managed to enter Adas Torah through an alleyway  
17 behind the building, where an armed security guard admitted him into the building.  
18

19 119. SCLJ Member #4 learned of this secret entrance through a WhatsApp  
20 group, though not all attendees of the June 23 events were on the group.  
21

22 120. SCLJ Member #4 did not find a prayer service available for him to  
23 join.  
24

25 121. SCLJ Member #5 was one of the worshippers who initially was  
26 prevented by the mob from exercising his constitutionally and statutorily protected  
27 free-exercise rights to attend the *Aliyah* Event and participate in an afternoon  
28 prayer service.

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1 122. SCLJ Member #5 had preregistered to attend the *Aliyah* Event.

2 123. SCLJ Member #5 managed to enter Adas Torah through an alleyway  
3 behind the building, where an armed security guard admitted him into the building.  
4

5 124. SCLJ Member #5 learned of this secret entrance through a WhatsApp  
6 group, though not all attendees of the June 23 events were on the group.  
7

8 125. SCLJ Member #5 did not find a prayer service available for him to  
9 join.  
10

11 126. SCLJ Member #6 had attended morning prayer services at the Adas  
12 Torah synagogue and remained inside the building.

13 127. When the riot began, SCLJ Member #6 was attempting to study Torah  
14 but had trouble doing so because of the violent commotion outside the building, as  
15 rioters blocked access to and from the synagogue, as well as blocked the sidewalks.  
16

17 128. SCLJ Member #7 was one of the worshippers who was prevented  
18 entirely by the mob from exercising his constitutionally and statutorily protected  
19 free-exercise rights to participate in an afternoon prayer service, the prayer service  
20 he regularly attends at Adas Torah.  
21

22 129. SCLJ Member #7 was not a member of the aforementioned WhatsApp  
23 group containing some attendees of Adas Torah, so he was unaware of the secret  
24 entrance to Adas Torah.  
25

26 130. Therefore, SCLJ Member #7 was unable to attend an afternoon prayer  
27 service at Adas Torah.  
28

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1            131. Though all three events continued at Adas Torah on July 23, 2024,  
2 upon information and belief, many regular members who either attend *minyan* or  
3 study Torah at Adas Torah in the afternoon were entirely unable to do so, much like  
4 SCLJ Member #7.

6            132. Of those SCLJ Members who eventually were able to attend events at  
7 Adas Torah, their initial attempts to attend the events were obstructed by rioters.

9            133. Furthermore, those SCLJ Members had to expose themselves to  
10 possible physical danger to attend their respective events.

12           134. On information and belief, the reason why the members who were  
13 able to enter the synagogue were nonetheless unable to find an available prayer  
14 service is because the prayer services were interrupted and obstructed by the mob.

16           135. The violence—and Defendant Organizations’ interference with  
17 worshippers’ attempts to exercise their rights to worship at Adas Torah—was  
18 reported in real time.

20           136. *The Wall Street Journal* published an article titled: “Pro-Palestinian  
21 Protesters Block Access to Los Angeles Synagogue in Violent Clash.”<sup>31</sup>

27           <sup>31</sup> Alyssa Lukpat, *Pro-Palestinian Protesters Block Access to Los Angeles Synagogue in*  
28 *Violent Clash*, WALL ST. J. (June 24, 2024, 5:48 PM), <https://www.wsj.com/us-news/pro-palestinian-protesters-block-access-to-los-angeles-synagogue-in-violent-clash-7d48098f>.



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1 137. KTLA 5 news station also reported that “[a]ccording to video posted  
2 to the Citizen app, pro-Palestinian protesters blocked the entrance to a  
3 synagogue.”<sup>32</sup>  
4

5 138. The next day, *The Jerusalem Post* published an article, titled, “Anti-  
6 Israel protesters beat, bear mace Jews, journalists at LA synagogue.”<sup>33</sup>  
7

8 139. Meanwhile, Defendant Organizations crafted their own narrative  
9 surrounding the riot, denying that their rioters were violent and rejecting the notion  
10 that any congregants were blocked from accessing the synagogue.  
11

12 140. On the day of the riot, CodePink’s Southeast Los Angeles chapter  
13 posted on its Instagram account a video from the riot, confirming its presence  
14 outside the synagogue.<sup>34</sup>  
15

16 141. The same day, CodePink’s Southeast Los Angeles chapter, in  
17 collaboration with the CodePink’s Los Angeles chapter and CodePink’s national  
18 organization, posted more footage from the riot, including another slide featuring a  
19 giant inverted red triangle with the address of Adas Torah inside it.<sup>35</sup>  
20

21 \_\_\_\_\_  
22 <sup>32</sup> Austin Turner & Josh DuBose, *Pro-Palestinian And Pro-Israeli Demonstrators Clash*  
23 *Outside Synagogue In Los Angeles*, KTLA 5, (June 23, 2024, 2:34 PM),  
24 <https://ktla.com/news/local-news/protesters-allegedly-block-entrance-to-synagogue-in-los-angeles/>.

25 <sup>33</sup> Michael Starr & Jerusalem Post Staff, *Anti-Israel protesters beat, bear mace Jews, journalists at LA synagogue*, JERUSALEM POST (June 24, 2024).

26 <sup>34</sup> CODEPINK Southeast Los Angeles Chapter (@codepinksela), INSTAGRAM,  
27 [https://www.instagram.com/reel/C8khglxyMw4/?utm\\_source=ig\\_web\\_copy\\_link&igsh=MzRIODBiNWFIZA==](https://www.instagram.com/reel/C8khglxyMw4/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA==) (last visited July 3, 2024).

28 <sup>35</sup> CODEPINK Southeast Los Angeles Chapter (@codepinksela) & CODEPINK Alert (@codepinkalert), INSTAGRAM,  
[https://www.instagram.com/p/C8iLvLIJu9h/?utm\\_source=ig\\_web\\_copy\\_link&igsh=MzRIODBi](https://www.instagram.com/p/C8iLvLIJu9h/?utm_source=ig_web_copy_link&igsh=MzRIODBi)

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1 142. The photograph was captioned, in part: “Our comrades witnessed  
2 nothing out of the ordinary: madness, chaos, agitation, provoking and the use of  
3 physical force by the zionist [*sic*] community and LAPD.”<sup>36</sup>  
4

5 143. In a public statement issued on June 24, 2024, CodePink  
6 acknowledged that its organizers and members attended the riot that blocked the  
7 entrance to the synagogue: “While our comrades were physically assaulted,  
8 pepper/bear sprayed, and attacked as they walked back to their cars, LAPD did  
9 nothing to keep us safe but rather pushed and used their combat toys to add to  
10 injury.”<sup>37</sup>  
11

12 144. The statement continued: “[S]hame on LA for allowing the hosting of  
13 these types of events that promote illegal sales of Palestinian territory and  
14 homes!”<sup>38</sup>  
15

16 145. Indeed, CodePink’s website states: “CODEPINK recognizes  
17 Palestinians as the rightful owners and caretakers of Palestine, their indigenous  
18 homeland,” and “[w]e support Palestinians’ right to resist the violent Israeli  
19 occupation of Palestine.”<sup>39</sup>  
20  
21

22  
23 \_\_\_\_\_  
24 NWFIZA%3D%3D&img\_index=2 (last visited July 3, 2024).

25 <sup>36</sup> *Id.*

26 <sup>37</sup> CODEPINK Los Angeles Chapter (@codepinkla) & CODEPINK Southeast Los  
27 Angeles Chapter (@codepinksela), INSTAGRAM,  
28 [https://www.instagram.com/p/C8nHwetSMQR/?utm\\_source=ig\\_web\\_copy\\_link&igsh=MzRIO DBiNWFIZA%3D%3D&img\\_index=1](https://www.instagram.com/p/C8nHwetSMQR/?utm_source=ig_web_copy_link&igsh=MzRIO DBiNWFIZA%3D%3D&img_index=1) (last visited July 3, 2024).

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

<sup>39</sup> CODEPINK- JUSTICE FOR PALESTINE, <https://www.codepink.org/palestine> (last visited

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146. CodePink’s website further emphasizes that “[w]e must express our outrage.”<sup>40</sup>

147. On Monday, June 24, 2024, CodePink’s national organization, in collaboration with CodePink’s Southeast Los Angeles chapter, posted on its Instagram a slide stating that “there was a peaceful protest against the illegal sale of stolen land in Palestine in a synagogue. Zionists attacked peaceful protestors, stole their phones, and LAPD watched on and helped.”<sup>41</sup>

148. Beneath the slide was a longer caption stating that “[n]o religious services were scheduled at the time of the real estate sale . . . . Contrary to what the media is falsely reporting, the entrance was never blocked by anyone.”<sup>42</sup>

149. Both statements by CodePink are false: there were religious services scheduled at Adas Torah the time of the riot instigated by CodePink, the *Aliyah* Event itself was also religious in nature, and the rioters organized by Defendant Organizations did block the entrance to Adas Torah.

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July 3, 2024).

<sup>40</sup> *Id.*

<sup>41</sup> CODEPINK Alert (@codepinkalert) & CODEPINK Southeast Los Angeles Chapter (@codepinksela), INSTAGRAM, [https://www.instagram.com/p/C8nDkh3y06J/?utm\\_source=ig\\_web\\_copy\\_link&igsh=MzRlODBiNWFiZA==](https://www.instagram.com/p/C8nDkh3y06J/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFiZA==) (last visited July 3, 2024).

<sup>42</sup> *Id.*

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150. Despite their demonstrable falsity, similar statements were posted on the Instagram accounts of CodePink’s Los Angeles and Southeast Los Angeles chapters.<sup>43</sup>

151. On Tuesday, June 25, 2024, CodePink’s Southeast Los Angeles chapter posted a video of a press conference with multiple speakers.

152. The first speaker—whose name is not provided—stated that the “Adas Torah synagogue is complicit in war crimes through its hosting of this event.”<sup>44</sup>

153. She added: “The attendees of this illegal sale event and the LAPD unleashed violence on protesters for daring to challenge the illegal sale of Palestinian land.”<sup>45</sup>

154. She finishes by assuring that: “[w]e will continue to challenge the sale of stolen Palestinian land in North American cities, no matter where these events take place.”<sup>46</sup>

155. The next day, CodePink’s Southeast Los Angeles chapter posted a single slide stating: “FUCK ISRAEL.”<sup>47</sup>

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<sup>43</sup> CODEPINK Southeast Los Angeles Chapter (@codepinksela), INSTAGRAM, <https://www.instagram.com/p/C8nHwetSMQR/?igsh=OWRmNXN3NW80Yzli>, (last visited July 5, 2024).

<sup>44</sup> CODEPINK Southeast Los Angeles Chapter (@codepinksela), INSTAGRAM, <https://www.instagram.com/reel/C8p9LjVSX72/?igsh=ZjRIZHhmY2N2eTI4> (last visited July 5, 2024).

<sup>45</sup> *Id.*

<sup>46</sup> *Id.*

<sup>47</sup> CODEPINK Southeast Los Angeles Chapter (@codepinksela), INSTAGRAM, [https://www.instagram.com/p/C8sWnHZy\\_R9/?utm\\_source=ig\\_web\\_copy\\_link&igsh=MzRIO](https://www.instagram.com/p/C8sWnHZy_R9/?utm_source=ig_web_copy_link&igsh=MzRIO)

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**Defendant Organizations’ Riot is Universally Censured.**

156. The riot outside of Adas Torah synagogue has been roundly condemned across the political spectrum.

157. Los Angeles Mayor Karen Bass released a statement on the day of the riot: “Today’s violence in the Pico-Robertson neighborhood was abhorrent, and blocking access to a place of worship is unacceptable . . . . I want to be clear that Los Angeles will not be a harbor for antisemitism and violence. Those responsible for either will be found and held accountable.”<sup>48</sup>

158. Similarly, President Joe Biden denounced the violent rioters the day-of: “I’m appalled by the scenes outside of Adas Torah synagogue in Los Angeles. Intimidating Jewish congregants is dangerous, unconscionable, antisemitic, and un-American. Americans have a right to peaceful protest. But blocking access to a house of worship—and engaging in violence—is never acceptable.”<sup>49</sup>

159. And California Governor Gavin Newsom stated that “[t]he violent clashes outside Adas Torah in Los Angeles are appalling. There is no excuse for targeting a house of worship. Such antisemitic hatred has no place in California.”<sup>50</sup>

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DBiNWFIZA== (last visited July 3, 2024).

<sup>48</sup> @MayorOfLA, X (June 24, 2024, 1:27 AM), <https://x.com/MayorOfLA/status/1805110392806642141>.

<sup>49</sup> @POTUS, X (June 24, 2024, 10:56 AM), [https://x.com/POTUS/status/1805253626551497103?ref\\_src=twsrc%5Etfw](https://x.com/POTUS/status/1805253626551497103?ref_src=twsrc%5Etfw).

<sup>50</sup> @CAGovernor, X (June 24, 2024, 1:16 AM), <https://x.com/CAGovernor/status/1805107636368810029>.

**FIRST CAUSE OF ACTION**

**Threatening and Intimidating Persons in Violation of 18 U.S.C. § 248(a)(2)**

**(SCLJ v. Defendant Organizations)**

**(Interference with Daily *Minyanim* and Torah Study Sessions)**

160. Plaintiff repeats, realleges, and incorporates by reference the allegations set forth in paragraphs 1 through 159 of this Complaint.

161. The FACE Act imposes civil and criminal penalties on any person who “by force or threat of force or by physical obstruction, intentionally injures, intimidates or interferes with or attempts to injure, intimidate or interfere with any person lawfully exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.” 18 U.S.C. § 248(a)(2).

162. The FACE Act permits an action to be brought “by [any] person lawfully exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship or by the entity that owns or operates such place of religious worship.” *Id* § 248(c)(1)(A).

163. Adas Torah is a place of religious worship for purposes of the FACE Act. *Id.* § 248(a)(2).

164. The daily *minyanim* and Torah study sessions described above indisputably involve the “exercise [of] the First Amendment right of religious freedom at a place of religious worship.” *Id.*

165. On June 23, 2024, members of SCLJ were “seeking to exercise the First Amendment right of religious freedom at a place of religious worship,”

1 namely Adas Torah, but members of Defendant Organizations either forcefully  
2 prevented them from doing so or attempted to forcefully prevent them from doing  
3 so. *See id.*  
4

5 166. Defendant Organizations, “[b]y force,” “threat of force, or physical  
6 obstruction,” “intentionally injure[d], intimidate[d], interfere[d] with,” and  
7 “attempt[ed] to injure, intimidate, [and] interfere with” the worship services being  
8 held at Adas Torah on June 23, 2024.  
9

10 167. Each of Defendant Organizations helped plan, organize, advertise, and  
11 fund the violent mob that threatened and intimidated the individuals lawfully  
12 exercising or seeking to exercise their First Amendment right of religious freedom  
13 at Adas Torah.  
14

15 168. The mob organized by Defendant Organizations—at a minimum,  
16 through their social media blitz—also employed nonviolent tactics to prevent  
17 members of SCLJ from exercising their First Amendment right of religious  
18 freedom at Adas Torah synagogue.  
19

20 21 169. Members of Defendant Organizations participated in the violence that  
22 prevented congregants from accessing Adas Torah.  
23

24 170. Other rioters were encouraged by Defendant Organizations to take  
25 part in the violence that prevented congregants from accessing Adas Torah.  
26

27 171. Defendant Organizations’ actions violated the FACE Act.

28 172. Defendant Organizations’ actions harmed members of SCLJ.

1 173. On behalf of its members who attempted to attend the *minyanim* and  
2 Torah study sessions, SCLJ seeks from Defendant Organizations, jointly and  
3 severally, \$5,000 per violation committed by Defendant Organizations’ members or  
4 actual damages, whichever is greater.  
5

6 174. As a result, SCLJ estimates statutory damages on behalf of these  
7 members under the FACE ACT total at least \$1,000,000.  
8

9 175. SCLJ also seeks temporary, preliminary, and permanent injunctive  
10 relief; punitive damages; and the costs of this suit and reasonable fees for attorneys  
11 and expert witnesses.  
12

13 **SECOND CAUSE OF ACTION**

14 **Threatening and Intimidating Persons in Violation of Cal. Pen. Code § 423.2**  
15 **(SCLJ v. Defendant Organizations)**

16 **(Interference with Daily *Minyanim* and Daily Torah Study Sessions)**

17 176. Plaintiff repeats, realleges, and incorporates by reference the  
18 allegations set forth in paragraphs 1 through 159 of this Complaint.  
19

20 177. The California FACE Act, Cal. Pen. Code § 423.2, provides that  
21 “[e]very person who . . . [b]y force, threat of force, or physical obstruction that is a  
22 crime of violence, intentionally injures, intimidates, interferes with, or attempts to  
23 injure, intimidate, or interfere with a person lawfully exercising or seeking to  
24 exercise the First Amendment right of religious freedom at a place of religious  
25 worship,” can be held civilly liable. Cal. Pen. Code § 423.2(b).  
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178. Section 423.4 provides that “[a] person aggrieved by a violation of” the California FACE Act “may bring a civil action to enjoin the violation, for compensatory and punitive damages, and for the costs of suit and reasonable fees for attorneys and expert witnesses,” so long as the plaintiff is either a person “lawfully exercising or seeking to exercise the First Amendment right of religious freedom in a place of religious worship, or the entity that owns or operates a place of religious worship.” *Id.* § 423.4(a).

179. And “[w]ith respect to compensatory damages, the plaintiff may elect, at any time prior to the rendering of a final judgment, to recover, in lieu of actual damages, an award of statutory damages in the amount of one thousand dollars (\$1,000) per exclusively nonviolent violation, and five thousand dollars (\$5,000) per any other violation, for each violation committed.” *Id.*

180. Finally, “[e]very person who . . . [i]ntentionally damages or destroys the property of a place of religious worship,” can be held civilly liable. *Id.* § 423.2(f).

181. Adas Torah is a place of religious worship for purposes of the California FACE Act. *Id.* § 423.2(b).

182. The daily *minyanim* and Torah study sessions described above indisputably involve the “exercise [of] the First Amendment right of religious freedom at a place of religious worship.” *Id.*

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1           183. On June 23, 2024, members of SCLJ were “seeking to exercise the  
2 First Amendment right of religious freedom at a place of religious worship,”  
3  
4 namely Adas Torah, but members of Defendant Organizations either forcefully  
5 prevented them from doing so or attempted to forcefully prevent them from doing  
6 so. *See id.*

7  
8           184. Defendant Organizations, “[b]y force, threat of force, or physical  
9 obstruction,” “intentional[ly] injure[d], intimidate[d], interfere[d] with,” and  
10 “attempt[ed] to injure, intimidate, or interfere with” the worship services being  
11 held at Adas Torah on June 23, 2024. *See id.* § 423.2(b).

12  
13           185. Each of Defendant Organizations helped plan, organize, advertise, and  
14 fund the violent mob that threatened and intimidated the individuals lawfully  
15 exercising or seeking to exercise their First Amendment right of religious freedom  
16 at Adas Torah.

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18           186. The mob organized by Defendant Organizations also employed  
19 nonviolent tactics—at a minimum, through their social media blitz—to prevent  
20 members of SCLJ from exercising their First Amendment right of religious  
21 freedom at Adas Torah.

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24           187. Members of each of Defendant Organizations, upon receiving  
25 encouragement from Defendant Organizations, participated in the violence that  
26 prevented congregants from accessing Adas Torah.

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28           188. Defendant Organizations’ actions violated the California FACE Act.

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1 189. Defendant Organizations’ actions harmed members of SCLJ.

2 190. On behalf of its members who attempted to attend the *minyanim* and  
3 Torah study sessions, SCLJ seeks from Defendant Organizations, jointly and  
4 severally, \$5,000 per violation committed by Defendant Organizations’ members  
5 and \$1,000 per nonviolent violation committed by Defendant Organizations’  
6 members or actual damages, whichever is greater.  
7

9 191. As a result, SCLJ estimates statutory damages on behalf of these  
10 members under the California FACE Act total at least \$1,000,000.  
11

12 192. SCLJ also seeks temporary, preliminary, or permanent injunctive  
13 relief; punitive damages; and the costs of this suit and reasonable fees for attorneys  
14 and expert witnesses.  
15

16 **THIRD CAUSE OF ACTION**

17 **Threatening and Intimidating Persons in Violation of 18 U.S.C. § 248(a)(2)**

18 **(SCLJ v. Defendant Organizations)**

19 **(Interference with *Aliyah* Event)**

20 193. Plaintiff repeats, realleges, and incorporates by reference the  
21 allegations set forth in paragraphs 1 through 159 of this Complaint.  
22

23 194. The FACE Act subjects to civil and criminal penalties any person who  
24 “by force or threat of force or by physical obstruction, intentionally injures,  
25 intimidates or interferes with or attempts to injure, intimidate or interfere with any  
26 person lawfully exercising or seeking to exercise the First Amendment right of  
27 religious freedom at a place of religious worship.” 18 U.S.C. § 248(a)(2).  
28

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1            195. The FACE Act permits an action to be brought under  
2 Section 248(a)(2) “by a person lawfully exercising or seeking to exercise the First  
3 Amendment right of religious freedom at a place of religious worship or by the  
4 entity that owns or operates such place of religious worship.” *Id* § 248(c)(1)(A).  
5

6            196. Adas Torah is an entity that “owns or operates” a place of worship for  
7 purposes of the FACE Act. *Id.* § 248(c)(1)(A).  
8

9            197. Many in the Jewish community, including members of SCLJ, believe  
10 that their faith includes a *mitzvah* to buy land in Israel and dwell there.<sup>51</sup>  
11

12            198. The *Aliyah* Event was scheduled to provide an opportunity for the  
13 Adas Torah congregants to satisfy this *mitzvah*.  
14

15            199. The *Aliyah* Event was an inherently religious activity for many Jewish  
16 people, including, for example, members of SCLJ.  
17

18            200. For these reasons, attendance at the *Aliyah* Event constitutes the  
19 “exercise [of] the First Amendment right of religious freedom at a place of  
20 religious worship.” *Id.*  
21

22            201. Therefore, on June 23, 2024, members of SCLJ were “seeking to  
23 exercise the First Amendment right of religious freedom at a place of religious  
24 worship,” namely Adas Torah, but members of Defendant Organizations either  
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<sup>51</sup> See *supra* note 14; see also *supra* ¶¶ 66-74.

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1 forcefully prevented them from doing so or attempted to forcefully prevent them  
2 from doing so. *See id.*

3  
4 202. Defendant Organizations, “[b]y force,” “threat of force, or physical  
5 obstruction,” “intentionally injure[d], intimidate[d], interfere[d] with,” and  
6 “attempt[ed] to injure, intimidate, or interfere with” the worship services being  
7 held at Adas Torah on June 23, 2024. *See* 18 U.S.C. § 248(a)(2).  
8

9 203. Each of Defendant Organizations helped plan, organize, advertise, and  
10 fund the violent mob that threatened and intimidated the individuals lawfully  
11 exercising or seeking to exercise the First Amendment right of religious freedom at  
12 Adas Torah.  
13

14 204. The mob organized by Defendant Organizations also employed  
15 nonviolent tactics—at a minimum, through their social media blitz—to prevent  
16 members of SCLJ from exercising their First Amendment right of religious  
17 freedom at Adas Torah.  
18

19  
20 205. Members of each of Defendant Organizations, upon receiving  
21 encouragement from Defendant Organizations, participated in the violence that  
22 prevented congregants from accessing Adas Torah.  
23

24 206. Defendant Organizations’ actions violated the FACE Act.

25 207. Defendant Organizations’ actions harmed members of SCLJ.

26  
27 208. On behalf of its members who attempted to attend the housing event,  
28 SCLJ seeks from Defendant Organizations, jointly and severally, \$5,000 per

1 violation committed by Defendant Organizations’ members or actual damages,  
2 whichever is greater.

3  
4 209. As a result, SCLJ estimates statutory damages on behalf of these  
5 SCLJ members under the FACE ACT total at least \$1,000,000.

6 210. SCLJ also seeks temporary, preliminary, or permanent injunctive  
7 relief; punitive damages; and the costs of this suit and reasonable fees for attorneys  
8 and expert witnesses.  
9

10 **FOURTH CAUSE OF ACTION**

11 **Threatening and Intimidating Persons in Violation of 18 U.S.C. § 248(a)(2)**  
12 **(SCLJ v. Defendant Organizations)**  
13 **(Interference with *Aliyah* Event)**  
14

15 211. Plaintiff repeats, realleges, and incorporates by reference the  
16 allegations set forth in paragraphs 1 through 159 of this Complaint.

17 212. The California FACE Act, Cal. Pen. Code § 423.2, provides that  
18 “[e]very person who . . . [b]y force, threat of force, or physical obstruction that is a  
19 crime of violence, intentionally injures, intimidates, interferes with, or attempts to  
20 injure, intimidate, or interfere with a person lawfully exercising or seeking to  
21 exercise the First Amendment right of religious freedom at a place of religious  
22 worship,” can be held civilly liable. Cal. Pen. Code § 423.2(b).  
23  
24

25 213. Section 423.4 provides that “[a] person aggrieved by a violation of”  
26 the California FACE Act “may bring a civil action to enjoin the violation, for  
27 compensatory and punitive damages, and for the costs of suit and reasonable fees  
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1 for attorneys and expert witnesses,” so long as the plaintiff is either a person  
2 “lawfully exercising or seeking to exercise the First Amendment right of religious  
3 freedom in a place of religious worship, or the entity that owns or operates a place  
4 of religious worship.” *Id.* § 423.4(a).  
5

6 214. And “[w]ith respect to compensatory damages, the plaintiff may elect,  
7 at any time prior to the rendering of a final judgment, to recover, in lieu of actual  
8 damages, an award of statutory damages in the amount of one thousand dollars  
9 (\$1,000) per exclusively nonviolent violation, and five thousand dollars (\$5,000)  
10 per any other violation, for each violation committed.” *Id.*  
11

12 215. Finally, “[e]very person who . . . [i]ntentionally damages or destroys  
13 the property of a place of religious worship,” can be held civilly liable. *Id.*  
14 § 423.2(f).  
15

16 216. Adas Torah is a place of religious worship for purposes of the  
17 California FACE Act. *Id.* § 423.2(b).  
18

19 217. Many in the Jewish community, including members of SCLJ, believe  
20 that their faith includes a *mitzvah* to buy land in Israel and dwell there.<sup>52</sup>  
21

22 218. The *Aliyah* Event was scheduled to provide an opportunity for the  
23 Adas Torah congregants to satisfy this *mitzvah*.  
24

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<sup>52</sup> *Id.*

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1           219. The *Aliyah* Event was an inherently religious activity for many Jewish  
2 people, including, for example, members of SCLJ.

3  
4           220. For these reasons, attendance at the *Aliyah* Event constitutes the  
5 “exercise [of] the First Amendment right of religious freedom at a place of  
6 religious worship.” *Id.*

7  
8           221. Therefore, on June 23, 2024, members of SCLJ were “seeking to  
9 exercise the First Amendment right of religious freedom at a place of religious  
10 worship,” namely Adas Torah, but rioters either forcefully prevented them from  
11 doing so or attempted to forcefully prevent them from doing so. *See id.*

12  
13           222. Defendant Organizations, “[b]y force, threat of force, or physical  
14 obstruction,” “intentional[ly] injure[d], intimidate[d], interfere[d] with,” and  
15 “attempt[ed] to injure, intimidate, or interfere with” the worship services being  
16 held at Adas Torah synagogue on June 23, 2024. *See id.* § 423.2(b).

17  
18           223. Each of Defendant Organizations helped plan, organize, advertise, and  
19 fund the violent mob that threatened and intimidated the individuals lawfully  
20 exercising or seeking to exercise their First Amendment right of religious freedom  
21 at Adas Torah.

22  
23           224. The mob organized by Defendant Organizations also employed  
24 nonviolent tactics—at a minimum, through their social media blitz—to prevent  
25 members of SCLJ from exercising their First Amendment right of religious  
26 freedom at Adas Torah.



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1 225. Members of each of Defendant Organizations, upon receiving  
2 encouragement from Defendant Organizations, participated in the violence that  
3 prevented congregants from accessing Adas Torah.  
4

5 226. Defendant Organizations’ actions violated the California FACE Act.

6 227. Defendant Organizations’ actions harmed SCLJ.  
7

8 228. On behalf of its members who attempted to attend the housing event,  
9 SCLJ seeks from Defendant Organizations, jointly and severally, \$5,000 per  
10 violation committed by Defendant Organizations’ members and \$1,000 per  
11 nonviolent violation committed by Defendant Organizations’ members or actual  
12 damages, whichever is greater.  
13

14 229. As a result, SCLJ estimates statutory damages on behalf of these  
15 members under the California FACE Act total at least \$1,000,000.  
16

17 230. SCLJ also seeks temporary, preliminary, or permanent injunctive  
18 relief; punitive damages; and the costs of suit and reasonable fees for attorneys and  
19 expert witnesses.  
20

21 **PRAYER FOR RELIEF**

22 WHEREFORE, Plaintiff respectfully requests that this Court enter  
23 judgment in its favor and against Defendant Organizations, as follows:  
24

- 25 1. Enter judgment against Defendant Organizations, jointly and  
26 severally, in the amount of the following: \$5,000 for each violation of the FACE  
27 ACT; \$5,000 for each violent violation of the California FACE Act; and \$1,000 for  
28

1 each nonviolent of the California FACE Act by each member of Defendant  
2 Organizations or actual damages, whichever is greater;

3  
4 2. Award SCLJ an appropriate punitive-damages award;

5 3. Award SCLJ its reasonable costs and expenses, including attorney  
6 fees, incurred in this action as authorized by 18 U.S.C. § 248(c)(1)(B) and Cal Pen  
7 Code § 423.2;

8  
9 4. Enjoin Defendant Organizations and their members from going within  
10 one-hundred feet of Adas Torah; and

11  
12 5. Award such other relief as the Court deems equitable and just.

13 **DEMAND FOR JURY TRIAL**


14 Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff  
15 respectfully demands a trial by jury of all issues triable by jury.  
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Respectfully submitted this 24th day of July, 2024.

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