

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

MARIANO TORRES and LESTER WILSON,

Plaintiffs,

v.

JAMES CARLSON, AIDAN PARISI, GRANT MINER, CATHERINE CURRAN-GROOME, PEOPLE’S FORUM, INC., LISA FITHIAN, GABRIEL YANCY, ETHAN CHOI, and JOHN DOES 1–40,

Defendants.

Civil Action No.: 25-cv-3474

**COMPLAINT**

**JURY TRIAL DEMANDED**

Plaintiffs Mariano Torres and Lester Wilson (together, “Plaintiffs”), by and through their attorneys, Torridon Law PLLC and the Louis D. Brandeis Center for Human Rights Under Law, as and for their complaint against James Carlson, Aidan Parisi, Grant Miner, Catherine Curran-Groome, People’s Forum, Inc., Lisa Fithian, Gabriel Yancy, Ethan Choi, and John Does 1 through 40 (collectively, “Defendants”) allege as follows:

**NATURE OF THE ACTION**

1. On the night of April 29, 2024, members of a highly coordinated mob (the “Occupiers”) donned masks and hoods to conceal their identities, armed themselves with rope, zip ties, and crow bars, and smashed their way through the doors and windows of Columbia University’s Hamilton Hall. Once inside, the masked invaders encountered two janitors who were working the overnight shift cleaning the building’s classrooms and bathrooms. The Occupiers terrorized the two men into the early morning of April 30th, assaulted and battered them, held them against their will, and derided them as “Jew-lovers” and “Zionists.”

2. The takeover of Hamilton Hall, including the attacks on the janitors inside (the “Occupation”), was not the spontaneous combustion of an overheated demonstration. It was the result of a calculated and deliberate escalation of Defendants’ ongoing campaign to “take[] back” Columbia University’s campus from Jews and “Zionists.”

3. Using violent, masked tactics reminiscent of the Ku Klux Klan and following—almost to the letter—an “Underground Manual” detailing ways to take illegal action with impunity, the individuals who stormed Hamilton Hall called for “Intifada,” an Arabic term for “uprising” that has become synonymous with a call to violent action against Israelis, Jews, and institutions supporting Jews and Israel.

4. Plaintiff Mariano Torres (“Mr. Torres”) is a janitor at Columbia University. He was hard at work inside Hamilton Hall when the Occupiers invaded the building. Mr. Torres is Latino. He is not Jewish. When he attempted to defend Hamilton Hall from the Occupiers, he was physically assaulted, threatened, and held against his will. And when he repeatedly refused to accept bribes from the Occupiers, his assailants shouted, “What are you, a Jew-lover?” They repeatedly called him a “Jew-lover” and “Zionist,” and they asked him, “Why are you protecting them?”

5. Plaintiff Lester Wilson (“Mr. Wilson”) is a janitor at Columbia University. He was hard at work inside Hamilton Hall when the Occupiers invaded the building. Mr. Wilson is African-American. He is not Jewish. When he attempted to defend Hamilton Hall from the Occupiers he was physically assaulted and held against his will. And when he begged members of the mob to release him from the building, they mocked him, repeatedly calling him a “Jew-lover,” “Jew-worker,” and “Zionist.”

6. As a direct result of the violent takeover and occupation of Hamilton Hall, both Mr. Torres and Mr. Wilson have suffered physical injuries and Post-Traumatic Stress Disorder (“PTSD”).

7. Defendants include individuals and an organization that conspired to prolong and intensify an ongoing campaign to harass, intimidate, terrorize, and deny the civil rights of people who are—or are perceived to be—Jews or supporters of Jews. In furtherance of this conspiracy, Defendants planned the violent takeover and occupation of Hamilton Hall.

8. In addition, as detailed below, individuals and certain non-defendant unincorporated associations and corporations including Columbia University Apartheid Divest (“CUAD”), Within Our Lifetime-United for Palestine (“WOL”), Westchester People’s Action Coalition, Inc. (“WESPAC”), Columbia Students for Justice in Palestine (“SJP”), and Columbia-Barnard Jewish Voice for Peace (“JVP”) were closely involved in planning, supporting, and agreeing to multiple actions taken on Columbia’s campus to express anti-Semitic hatred and to intimidate Jewish students and those perceived to be their supporters. Defendants joined the conspiracy and agreed with others to occupy Hamilton Hall.

9. The plot to take Hamilton Hall by force was triggered by Columbia University’s decision on April 29, 2024, to remove a so-called “Gaza Solidarity Encampment” (the “Encampment”) from the campus.

10. The Encampment had begun on or about April 17, 2024, when demonstrators, without permission from Columbia University, set up tents and other temporary structures on the East Butler Lawn of Columbia University’s campus.

11. The organizers of the unauthorized Encampment—specifically, persons associated with CUAD, SJP, and JVP—claimed that the Encampment was an effort by students to “take[] back” Columbia University’s campus “in the spirit of the ’68 occupation of Hamilton Hall.”

12. The Encampment was not a symbol of peaceful protest. Instead, it was a hotbed of virulent anti-Semitism. There, Jewish students were barred from entry, physically assaulted, and subjected to calls of “Yahoodim, yahoodi [Jews, Jew], fuck you,” “stop killing children,” “go back to Poland,” “Nazi bitches,” and “go to a synagogue.”<sup>1</sup> Chants in Arabic of “From the River to the Sea, Palestine will be Arab” called for the extermination of Jews and the annihilation of the state of Israel.

13. On the morning of April 29, 2024, after attempts by Columbia administrators to negotiate with leaders of the Encampment failed, the President of Columbia University issued a statement admitting that the Encampment, with the support of “[e]xternal actors,” had created “a hostile environment [for Jews] in violation of Title VI” of the Civil Rights Act of 1964.<sup>2</sup> Columbia University announced that it would begin to suspend students who were participating in the Encampment if they did not disperse by 2:00 p.m.

14. Neither the leaders of the Encampment nor their external supporters were about to yield an inch of ground. Upon information and belief, they mobilized immediately and devised a plan to prolong and intensify their campaign of anti-Semitic violence and intimidation at Columbia University.

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<sup>1</sup> Video materials, Kobrin Post-Oct 7 Collection, IIJS Papers, Columbia University Archives, RBML, <https://tinyurl.com/u64xtucr>.

<sup>2</sup> Press Release, Columbia Univ., Statement from Columbia University President Minouche Shafik (Apr. 29, 2024), <https://perma.cc/5LB7-AV5R>.

15. Upon information and belief, Columbia students, employees, and faculty affiliated with CUAD and its constituent groups, and other non-Columbia-affiliated persons who supported or identified with CUAD, met in the midtown New York office of People’s Forum, Inc. which does business under the name The People’s Forum (“TPF”) to plan their next move. The organizations that participated directly or indirectly included CUAD, SJP, JVP, TPF, National Students for Justice in Palestine (“NSJP”), WOL, and WESPAC. Upon information and belief, several experienced outside agitators participated, including James “Cody” Carlson and Lisa Fithian. Collectively, the co-conspirators devised and agreed to a plan to storm and seize Hamilton Hall.

16. Hamilton Hall would be the new stronghold from which Defendants would wage their campaign of harassment, intimidation, and terror against members of the Columbia community who were—or were perceived to be—Jews or their supporters. Defendants planned to take the building by force, intimidation, and even bribery.

17. The hate-fueled mob that took over Hamilton Hall had commanders and foot soldiers, each with a specific role to play and task to execute. From the earliest moments of the storming of Hamilton Hall, Mr. Torres and Mr. Wilson observed several individuals barking orders to their followers in the mob, directing their fellow Occupiers to different floors and rooms in the building. Some of the Occupiers were responsible for “fortifying” the building by barricading the exits with items such as vending machines and furniture. Others were responsible for zip-tying the exits shut. Others distributed supplies throughout the building.

18. When the building was finally fortified, the Occupiers unfurled a banner emblazoned with the word “INTIFADA” from a balcony. They also unfurled a banner reading “Student Intifada” from another window. The Occupiers’ message was so disturbing, so

unmistakable, that President Biden issued a statement later that day “condemn[ing] the use of the term ‘intifada,’ as . . . tragic and dangerous hate speech” and a “repugnant, antisemitic smear[.]” The White House further added, “Forcibly taking over buildings is not peaceful – it is wrong. And hate speech and hate symbols have no place in America.”<sup>3</sup>



19. Hate speech and hate symbols may have no place in America, but, according to a Report of the House Committee on Education and the Workforce, they found a home at Columbia University, in the “extremist” and “antisemitic” Encampment, and ultimately in Hamilton Hall—all “in direct contravention of institutional policy and the law.”<sup>4</sup>

20. On the night of April 29th and into the morning of April 30th, Mr. Torres and Mr. Wilson confronted the hate-fueled anti-Semitic mob alone. They were targeted for being, in the Occupiers’ words, “Jew-lovers.” As a result, Mr. Torres and Mr. Wilson have suffered injuries so

<sup>3</sup> Joey Garrison, *White House Condemns Takeover of Columbia University Building, Use of ‘Intifada’ at College Protests*, USA Today (April 30, 2024), <https://perma.cc/5LTV-BHDL>.

<sup>4</sup> *Republican Staff Report: Antisemitism on College Campuses Exposed* (Oct. 31, 2024), <https://perma.cc/66RW-R8A2>.

severe that the men have been unable to return to work since the Occupation. This lawsuit seeks to recover the wages Plaintiffs have lost and to obtain financial compensation for, among other things, the long-term care that each will need as they work to recover from the mental and physical injuries caused by Defendants.

### **PARTIES**

21. Plaintiff Mariano Torres is an individual and is domiciled in New Jersey. For the five to six years preceding the Occupation, he had been employed as a heavy cleaner for Columbia University and had most recently been assigned to the overnight shift in Hamilton Hall where he cleaned the classrooms on the third floor.

22. Plaintiff Lester Wilson is an individual and is domiciled in Queens, New York. For the five to six years preceding the Occupation, he had been employed as a heavy cleaner for Columbia University and had most recently been assigned to the overnight shift in Hamilton Hall where he cleaned the bathrooms and classrooms on the third floor.

23. Defendant James “Cody” Carlson (“Carlson”) is an individual and, upon information and belief, is domiciled in Brooklyn, New York. Carlson maintains an active membership in the New York State Bar as a duly admitted attorney and has been described in news reports as a “longtime anarchist.”<sup>5</sup>

24. Defendant Aidan Parisi (“Parisi”) is an individual who goes by the pronouns “they/them” and, until their expulsion in March 2025, was a graduate student at Columbia University’s School of Social Work. Upon information and belief, Parisi is domiciled in Manhattan, New York, and was one of the student leaders of one or more of the Columbia student

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<sup>5</sup> Tina Moore, Chris Harris & Matthew Sedacca, *‘Violent’ Columbia Protester Is Heir to Ad Empire, Has Mansion, Model Babymama — and Long Rap Sheet*, New York Post (May 4, 2024), <https://perma.cc/NH7Z-QZ8U>[https](https://perma.cc/NH7Z-QZ8U).

groups responsible for the siege of Hamilton Hall, including SJP, JVP, and/or CUAD. Upon information and belief, Parisi is actively involved in the non-Columbia-affiliated group WOL. Upon information and belief, Parisi was one of the organizers of the Resistance 101 event described herein. They were suspended by Columbia for their role in organizing that event.

25. Defendant Grant Miner (“Miner”) is an individual and, until his expulsion in March 2025, was a student at Columbia pursuing a Ph.D. in the English and Comparative Literature department. He is a co-founder of CUAD and was the president of the Student Workers of Columbia-United Auto Workers Union, Local 2710 (“UAW 2710”). Upon information and belief, he is domiciled in Brooklyn, New York.

26. Defendant Catherine Curran-Groome (“Curran-Groome”) is an individual and a graduate student at Columbia University’s School of Social Work. Upon information and belief, she is domiciled in Philadelphia, Pennsylvania, and is one of the student leaders of one or more of the Columbia student groups responsible for the siege of Hamilton Hall, including SJP, JVP, and/or CUAD. Upon information and belief, Curran-Groome was one of the organizers of the Resistance 101 event described herein. She was suspended by Columbia for her role in organizing that event.

27. Defendant People’s Forum, Inc. is a not-for-profit corporation organized under Section 501(c)(3) of the Internal Revenue Code, is organized and existing under the Laws of the State of New York, and is registered with the New York State Office of the Attorney General as a not-for-profit organization. TPF maintains a principal place of business at 320 W. 37th St, New York, New York 10018.

28. Defendant Lisa Fithian (“Fithian”) is an individual and, upon information and belief, is domiciled in Austin, Texas. Fithian has been described in news reports and by New York



City Mayor Eric Adams as a “professional agitator.”<sup>6</sup> Fithian has long been involved in organized protests including the “Occupy Wall Street” movement.

29. Defendant Gabriel Yancy (“Yancy”) is an individual and, upon information and belief, is domiciled in Ridgewood, New York. Prior to the events described herein, Yancy was employed by Columbia University in its neuroscience laboratory at the Zuckerman Institute.

30. Defendant Ethan Choi (“Choi”) is an individual and a student at Columbia University majoring in political science and government. Upon information and belief, he is domiciled in Atlanta, Georgia.

31. Defendants John Does<sup>7</sup> 1 through 40 are individuals who, while wearing masks and other clothing designed to disguise their identities, directly participated in the takeover of Hamilton Hall, and include, but are not limited to, those individuals arrested by the New York Police Department in Hamilton Hall on May 1, 2024: Marianne Almero, Aya Aryan, Zachary Berman, Benjamin Bonnet, Rose Bottorf, Laura Brown, Violet Bupp-Chickering, Eliot Choi, Joshua Connerty, Sebastian Gomez, Christopher Holmes, Aaliya Hong, Naay Idriss, Julia Jackson, Sebastian Jimenez, Franziska Lee, Taylor Lee, Jingying Lin, Ibtiha Malley, Madelyn McGuigan, Eloise Maybank, Brandon Murphy, Raiya Al-Nsour, Anika Raju, Elizabeth Reade, Sophia Ricaurte, Alessandro Romero, Rebeca Sabnam, Charles Sadowski, Atish Saha, Andrea Salamanca, Samarra Sankar, Layla Sharifi, Jackson Smith, Bridget Squitire, Molly Steindorf, Peter Tanaka, Dylan Thomas, and Tiffany Yang.

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<sup>6</sup> Andrew Keh & Katherine Rosman, *The 63-Year-Old Career Activist Among the Protesters at Columbia*, N.Y. Times (May 1, 2024), <https://perma.cc/VTJ6-ZUGZ>.

<sup>7</sup> For ease of reference, as used herein, the fictitious name John Doe is intended to be gender neutral.

### **JURISDICTION AND VENUE**

32. The Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331, as Plaintiffs assert claims against Defendants under 42 U.S.C. §§ 1985 and 1986.

33. The Court has supplemental jurisdiction over Plaintiffs' state law claims pursuant to 28 U.S.C. § 1367(a).

34. This Court has personal jurisdiction over each Defendant pursuant to Sections 301 and 302(a)(1) and (2) of New York Civil Practice Law and Rules, as each Defendant resides in the State of New York, transacts business or contracts to supply goods or services in the State of New York, and/or committed the tortious acts complained of herein within the State of New York.

35. Venue in the Southern District of New York is proper under 28 U.S.C. § 1391 because it is the judicial district in which a substantial part of the events or omissions giving rise to Plaintiffs' claims occurred, and where at least one Defendant is domiciled.

### **FACTUAL ALLEGATIONS**

#### **A. Anti-Semitism Explodes At Columbia University After The Hamas Attacks Of October 7, 2023.**

36. On October 7, 2023, Hamas militants launched offensive attacks from Gaza on Israel, torturing, sexually assaulting, and murdering civilians in their homes, at a music festival, and in their communities. Hamas militants murdered 1,139 people, mostly civilians. In addition, Hamas kidnapped about 250 hostages, many of whom remain in Gaza to this day.

37. Hamas is a designated terrorist organization. Its founding charter calls for the murder of all Jews, declaring, "The Day of Judgement will not come about until Moslems fight the Jews" and "the Jew will hide behind stones and trees." When that day comes, the charter continues, "[t]he stones and trees will say O Moslems . . . there is a Jew behind me, come and kill him." Although Hamas subsequently issued a statement of principles claiming that its "conflict is

with the Zionist project not with the Jews because of their religion,” the terrorist organization has neither amended nor repudiated the founding charter’s call for the murder of all Jews.

38. October 7, 2023 was the deadliest day for world Jewry since the Holocaust. The following day, before Israel had even begun burying its dead, NSJP publicly celebrated the mass murder perpetrated by Hamas as a “historic win for the Palestinian resistance.”<sup>8</sup> NSJP urged its members to celebrate the mass murder for bringing “glory to our resistance, to our martyrs, and to our steadfast people” and reminded local chapters of their “unshakable responsibility to join the call for mass mobilization.”

39. To help local chapters heed this call, NSJP issued a “Day of Resistance Toolkit” (“Resistance Toolkit”) that exhorted members to “resist [Zionism] directly” by “wielding the political power that our organizations hold on our campuses and in our communities.” The Resistance Toolkit asked local chapters to “host demonstrations” and, if that was not possible, to engage in “sit-in[s], disruption[s], or educational event[s].”

40. Columbia’s chapters of SJP and JVP took up the call to action, organizing numerous Day of Resistance demonstrations on campus. Upon information and belief, SJP and JVP were, and continue to be, funded and operationally supported by WESPAC and WOL. WESPAC uses its tax-exempt status to solicit and collect donations and grants for NSJP’s benefit and use. Upon information and belief, some of the funds collected by WESPAC were distributed by NSJP to one or more of the unincorporated associations described herein, including SJP and JVP, for use in connection with the actions described herein.

41. The rhetoric leading up to the Day of Resistance was so laced with hateful and threatening messages toward Israel and Jewish people that Columbia closed its campus to the

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<sup>8</sup> “Day of Resistance Toolkit,” <https://perma.cc/S2NJ-PPF6>.

public as a security measure. Indeed, the night before the Day of Resistance, a Columbia undergraduate who was tearing down flyers bearing photos of Israeli hostages assaulted an Israeli student with a stick in front of the University's Butler Library.

42. The so-called "Day of Resistance" took place on October 12, 2023. SJP's demonstration began in the late afternoon on one of the lawns at the heart of the University's campus. By evening, the demonstrators began marching away from the main campus toward the Kraft Center for Jewish Student Life ("Kraft Center"). According to the Executive Director of the Kraft Center, officers from Columbia Public Safety and the NYPD reported to the building. The doors of the Kraft Center were locked, and students were advised to remain inside for their safety until the demonstrators dispersed.<sup>9</sup>

43. On October 18, 2023, Columbia University President Shafik wrote to the Columbia University community to urge "civility, respect, and empathy" in interactions with "people who don't share our views."<sup>10</sup> She encouraged "de-escalating tensions, modeling respectful behavior, and finding common ground in our shared community." She stated that she was responding to "anti-Semitism, Islamophobia, [and] bigotry against Palestinians and Israelis" being used by "members of [Columbia's] community, including members of our faculty and staff."

44. Nevertheless, unauthorized protests persisted on Columbia's campus, as did harassment and violence against Jews.

45. On November 9, 2023, the 85th anniversary of the Nazi Kristallnacht, a "Shut it Down for Palestine" demonstration took place at Columbia. Demonstrators spouted hateful anti-

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<sup>9</sup> Rebecca Massel, *'I Am a Target': Dozens of Jewish Students Report Feeling Unsafe on Campus*, Colum. Spectator (Nov. 2, 2023), <https://perma.cc/2NBF-VWH9>.

<sup>10</sup> Press Release, Columbia Univ., Upholding Our Values (Oct. 18, 2023), <https://perma.cc/6MJW-FKEU>.

Semitic messages like “Death to Jews!” and “Fuck the Jews,” and encouraged violence against any pro-Israel Columbia students. The demonstration was not approved by Columbia administrators.

46. On November 10, 2023, Columbia’s Senior Executive Vice President of the University and Chair of the Special Committee on Campus Safety, Gerald Rosberg, issued a statement announcing that the University was suspending SJP and JVP for “repeatedly violat[ing] University policies related to holding campus events.”<sup>11</sup> These repeat violations, Rosberg explained, “culminat[ed] in an unauthorized event,” the “Shut it Down for Palestine” demonstration, “that proceeded despite warnings” and “included threatening rhetoric and intimidation.”

47. Notwithstanding Columbia’s suspension of SJP and JVP, both of those student groups, including the students associated with each of those groups, continued—through their association with CUAD—to participate in pro-Hamas demonstrations and/or harassment of Jewish students. Upon information and belief, the Columbia SJP and JVP chapters continued to receive funding and operational support directly and/or indirectly from WESPAC and WOL.

48. In response to Columbia’s decision to suspend SJP and JVP, on November 14, 2023, CUAD published a manifesto (the “Manifesto”) in the Columbia Spectator, a student newspaper. The Manifesto was signed by student groups including SJP and JVP.<sup>12</sup>

49. The Manifesto began by quoting Ghassan Kanafani, a former leader of the Popular Front for the Liberation of Palestine (“PFLP”) who was killed by the Mossad for his role in a 1972

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<sup>11</sup> Press Release, Columbia Univ., Statement from Gerald Rosberg, Chair of the Special Committee on Campus Safety (Nov. 10, 2023), <https://perma.cc/KHE7-XR25>.

<sup>12</sup> Columbia Univ. Apartheid Divest, *Columbia University Apartheid Divest: Who We Are*, Colum. Spectator (Nov. 14, 2023), <https://perma.cc/L9ME-WKYA>.

terrorist attack in which 17 Americans from Puerto Rico were murdered while on a religious pilgrimage to Israel. The PFLP has been designated as a terrorist organization by the United States for nearly thirty years. It is aligned with Hamas and participated in the October 7th attacks.

50. The Manifesto identified CUAD as “a coalition of student organizations that see Palestine as the vanguard for our collective liberation” and “a continuation of the Vietnam anti-war movement and the movement to divest from apartheid South Africa.” CUAD called on Columbia to (1) reinstate SJP and JVP, (2) “divest from companies profiting from Israeli apartheid,” and (3) “[c]ancel the opening of the [University’s] Tel Aviv Global Center.” The Manifesto typified a strategy used by CUAD and others to mimic the rhetoric of political protest movements (particularly the protest movements against the Vietnam War and South African apartheid) in order to advance pro-Hamas, anti-Semitic objectives.

51. In furtherance of its objectives, CUAD began targeting Jewish students and anyone viewed as supporting the Jewish community. These targets were subjected to many forms of harassment ranging from mockery to vitriolic threats and physical assaults. Upon information and belief, CUAD and its affiliates sought to silence any opposition or criticism, drive those in the Jewish community apart and off campus, restrict their access to places on campus, and deny them safety or a feeling of safety as they attempted to engage in daily activities such as attending classes and participating in extracurricular activities.

52. CUAD’s excesses were documented in the March 4, 2024 report issued by Columbia’s Task Force on Anti-Semitism, which reviewed Columbia’s rules on demonstrations.<sup>13</sup> The report concluded that Columbia’s rules on protests “have often been violated in recent months.

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<sup>13</sup> *Columbia Univ. Task Force on Antisemitism, Report #1: Columbia University’s Rules on Demonstrations* (Mar. 2024), <https://perma.cc/DSV4-8ZW2>.

Protesters, including those affiliated with CUAD, have disrupted classes and events, taken over spaces in academic buildings, held unauthorized demonstrations, and used ugly language to berate individuals who were filming these protests or just walking by. There also have been reports of physical harm to students . . . .” The report concluded that Jewish students and other Jewish members of the Columbia community were frequent targets of harassment and assaults.

**B. Anti-Semitism And Calls For Intifada Intensify While Leaders Arrange For The Unauthorized “Resistance 101” Event And Set Up The Encampment.**

53. Upon information and belief, on or about March 15, 2024, Curran-Groome and Parisi, on behalf of CUAD and the Palestine Working Group at Columbia’s School for International and Public Affairs, sought approval from the University to host an event on campus on March 24, 2024, to address “the myriad of forms of resistance that Palestinians have adopted historically.”

54. Upon information and belief, the University requested additional information about the event and the speakers who would be featured. After reviewing that information, the University did not approve the event.

55. Nevertheless, on March 24, 2024, CUAD (including SJP and JVP) sponsored an event called “Resistance 101.” The event was held at a Columbia student housing residence known as Q House. The event was co-sponsored by the non-Columbia-affiliated group WOL, which was founded and is led by Nerdeen Kiswani (“Kiswani”), a vocal organizer of many anti-Israel protests and demonstrations in the New York City area. Upon information and belief, TPF and WESPAC were also directly or indirectly involved in planning, sponsoring, advertising, or orchestrating the event.

56. CUAD and WOL had originally planned for the Resistance 101 event to take place at the Center for Research on Women at Barnard College. After Columbia University refused to

authorize the event, the organizers decided to relocate the event to Q House with the guest speakers appearing via Zoom. Many students attended in person in what appeared to be a common area of the building. Others were permitted to attend via Zoom. Individual members of the Columbia faculty and staff promoted the event through social media channels.

57. The Resistance 101 event was led by Kiswani, who appeared in person. The express purpose of the event was to praise and encourage support for the Palestinian armed resistance, including the events of October 7th. The Resistance 101 event lasted nearly two hours. It was recorded and subsequently posted to YouTube.<sup>14</sup> Upon information and belief, it was attended by members of CUAD, SJP, and JVP, including Parisi and Curran-Groome. Some in attendance wore face and/or head coverings to conceal their identities.

58. One of the invited guest speakers was Khaled Baraka, who describes himself as a Palestinian writer and activist. Baraka was introduced as a senior leader of “The Palestinian Alternative Revolutionary Path Movement.” Baraka has been identified by the Israeli security service Shin Bet and others as an active and senior member of the PFLP, a U.S.-designated terrorist organization that participated in the October 7th terrorist attacks on Israel.

59. During the Resistance 101 event, Baraka claimed to have spoken with his “friends and brothers in Hamas, Islamic Jihad, and the PFLP. . . especially after October 7th.” Like the PFLP and Hamas, Islamic Jihad is a designated terrorist organization. Baraka further claimed that these groups were excited to see student groups in America protesting on their behalf. He stated, “Your work as students is important to Hamas and the Palestinian Liberation Front.” He made general statements that glorified the October 7th attacks and stated how important they were for

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<sup>14</sup> Stu Stu Studio, *Resistance 101 Hosted by Columbia University Apartheid Divest* (Apr. 1, 2024), YouTube, <https://tinyurl.com/2vn6x9nx>.



all resistance groups globally. He also praised the hijacking of airplanes, stating, “Hijacking airplanes is one of the most important tactics that the Palestinian resistance ha[s].”

60. Another invited guest speaker was Charlotte Kates, who is known to be Baraka’s wife and the international coordinator of Samidoun: Palestinian Prisoner Solidarity Network (“Samidoun”). Kates was introduced as speaking on behalf of Samidoun. Samidoun reportedly raises funds for the PFLP and has been designated as a terrorist group by multiple countries, including the United States.

61. In her talk, Kates frequently made light of and glorified the October 7th attacks, describing them as “chang[ing] the world,” “earth shattering,” and “necessary action.” She stated, “There is nothing wrong with being a member of Hamas, being a leader of Hamas, being a fighter in Hamas,” and she credited and celebrated the Hamas tunnel network for allowing the Palestinian resistance movement to organize and build weapons. She encouraged the audience “to stand with the armed resistance. It is the moral and right thing to do.”

62. Kiswani, as the host of the Resistance 101 event and leader of WOL, encouraged the audience “to stand with those identified as terrorists” and to “go harder towards resistance.” Her message reflected her pattern of anti-Semitic rhetoric and chants, which routinely includes calls for violence against Jews and the destruction of Israel, as well as praise for Hamas and other jihadist terrorist organizations that call for the murder of Jews. Indeed, in February 2024, Meta suspended WOL’s social media accounts on its platforms, including Instagram, having concluded that WOL’s accounts violated its community guidelines, including its “Dangerous Organizations and Individuals” policy.

63. On April 3, 2024, CUAD published a post on Substack, an online platform, claiming that Columbia administrators were attempting “to intimidate student groups and student

group leaders” in response to the Resistance 101 event.<sup>15</sup> CUAD offered to connect students with “CUAD’s legal team” and “faculty supporters.” It further urged readers to attend a rally the following day and specified the measures participants should take to conceal their identities, including not swiping their Columbia University ID cards, not communicating on Columbia email accounts, wearing masks, covering their heads, and only unmasking once out of CCTV range.

64. Upon information and belief, on or about April 4, 2024, Columbia University notified several students, including Defendants Parisi and Curran-Groome, that they would be suspended for their involvement in the Resistance 101 event. Parisi was expressly advised that they would be evicted from their on-campus graduate student housing as a result of their organizing and/or participating in the pro-Hamas event.

65. Although Columbia’s April 4th notice indicated that Parisi had 24 hours to vacate their on-campus housing, days later, on April 8th, Parisi posted a message on social media accounts detailing their ongoing refusal to leave. They vowed to “resist institutional repression.” Parisi wrote, “Que viva la intifada . . . Inshallah, we will rise victorious,”<sup>16</sup> previewing the escalation that was to come.

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<sup>15</sup> Columbia Univ. Apartheid Divest, *Emergency Communication [Acton Needed]!* (Apr. 3, 2024), <https://tinyurl.com/mpm2wnbd>.

<sup>16</sup> Aidan Parisi (@AllegedlyAidan, X (Apr. 8, 2024, 1:17 PM), <https://perma.cc/JYF5-NGK6>.



C. **Defendants Work In Coordination To Establish, Promote, And Support A So-Called “Gaza Solidarity Encampment” That Rapidly Becomes A Hotbed Of Anti-Semitic Activity.**

66. By April 17, 2024, Parisi still had not vacated their student housing as ordered by Columbia. Parisi, along with Miner, Curran-Groome, and others—with the support of organizers from student groups CUAD, SJP, and JVP—set up tents on the East Butler Lawn of Columbia University’s campus. This became the so-called “Gaza Solidarity Encampment” and represented a significant escalation of their tactics.<sup>17</sup>

67. CUAD and others characterized the Encampment as part of CUAD’s campaign “to bring instability home, inside the core of empire” by “increasing instability within Columbia.”<sup>18</sup> The Encampment’s leaders, members, and supporters sought to destabilize the campus for Jewish members of the Columbia community by subjecting them to intimidation, harassment, and terror.

<sup>17</sup> Columbia Daily Spectator (@ColumbiaSpec), X (Apr. 17, 2024, 5:11 AM), <https://perma.cc/23CR-ZC5T>.

<sup>18</sup> Dasha M., Luma Washou, Parviz Behrangi, Caroline Reynolds & Amal Haddad, *Palestine Is the Vanguard for Our Liberation: Insights from the Students’ Intifada at Columbia University*, 33 Middle E. Critique 487, 489 (2024).

68. Columbia’s August 2024 Report #2 from its Task Force on Anti-Semitism documented some of the anti-Semitic incidents at and around the Encampment over the course of its two-week existence.<sup>19</sup> For example, Jewish students who were holding Israeli flags were physically assaulted by demonstrators. A demonstrator held up a sign that said “Al Qassam’s next targets” in front of a group of Jewish students. Jewish students were taunted with chants calling for the death of Jews and Israelis such as “Yes Hamas, we love you, we support your rockets too,” and “We say justice you say how, burn Tel Aviv to the ground.”

69. Indeed, a video reel linked by the Task Force’s second report contains footage of these—and many other—anti-Semitic incidents, including Jewish students being told, “Go back to Poland,” “Go back to Europe—You have no culture,” “Kill yourself,” “go to a synagogue,” and “Yahoodim, yahoodi, [Jews, Jew] fuck you.” The video also shows demonstrators filling the air with chants calling for violence against Jews. Members of the Encampment shouted in Arabic through megaphones, “From the river to the sea, Palestine will be Arab!” WOL leader Kiswani led demonstrators in chants of, “There is only one solution, Intifada revolution!”<sup>20</sup>

70. From Day One, the Encampment had outside support. The Encampment began at 4:00 a.m. on April 17, 2024, when demonstrators began their occupation of the East Butler Lawn. That afternoon, at 3:20 p.m., TPF published a message on the social media platform X telling others how they could “support the historic Gaza Solidarity Encampment at Columbia

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<sup>19</sup> Columbia Univ. Task Force on Antisemitism, *Report #2: Columbia University Student Experiences of Antisemitism and Recommendations for Promoting Shared Values and Inclusion* (Aug. 2024), <https://perma.cc/E4EZ-EGWK>.

<sup>20</sup> Video materials, Kobrin Post-Oct 7 Collection, IIJS Papers, Columbia University Archives, RBML, <https://tinyurl.com/u64xtucr>.

University[.]”<sup>21</sup> Among the ways TPF encouraged individuals to support the Encampment were to “Protect the Encampment” by emailing Columbia professors, dropping off food, art, or signs (that support “divestment/opposition to Zionism”), and sending money to “Help support legal fees, supplies, and more” via Venmo to the account @bcabolitioncollective (an account in the name of the Barnard-Columbia Student Abolition Collective).

71. That same day, at 8:08 p.m., TPF published another message on X praising “the brave students who made history today with the Gaza Solidarity Encampment.”<sup>22</sup>

72. The following day, April 18, 2024, Columbia University responded to the formation of the Encampment by suspending three students for their roles in the Encampment and authorizing the New York Police Department (“NYPD”) to “begin clearing the encampment.” According to Columbia President Shafik, it had been “determined that the encampment and related disruptions pose[d] a clear and present danger to the substantial functioning of the University.”<sup>23</sup>

73. In a letter to the Columbia University community, President Shafik indicated that the decision to bring in the NYPD was made because “[t]he individuals who established the encampment violated a long list of rules and policies,” and, despite having received multiple warnings, the protestors did not disband the Encampment.<sup>24</sup>

74. At approximately 1:30 p.m., the NYPD entered the Encampment and announced that individuals participating in the unauthorized encampment would be arrested. Approximately

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<sup>21</sup> People’s Forum, Inc. (@PeoplesForumNYC), X (Apr. 17, 2024, 3:20 PM), <https://perma.cc/UAW8-F97F>.

<sup>22</sup> People’s Forum, Inc. (@PeoplesForumNYC), X (Apr. 17, 2024, 8:08 PM), <https://tinyurl.com/57es6zkx>.

<sup>23</sup> Press Release, Columbia Univ., Letter to NYPD (Apr. 18, 2024), <https://perma.cc/UA2B-9X88>.

<sup>24</sup> Press Release, Columbia Univ., Statement from Columbia University President Minouche Shafik (Apr. 18, 2024), <https://tinyurl.com/bdh5wwdd>.

ten minutes later, the NYPD began arresting protestors who refused to disperse. Over the next several hours, over 100 students were arrested and charged with trespassing. The NYPD also began dismantling the tents and other structures erected in the Encampment.

75. Despite the arrests, CUAD, SJP, JVP and individual protestors in the Encampment immediately re-established the Encampment, this time on the West Butler Lawn.

76. The Encampment continued despite warnings from Columbia University that it would suspend and evict students who remained. Leaders of the Encampment were defiant. At approximately 1:20 a.m. on April 19, 2024, Parisi posted to their (i.e., Parisi's) social media accounts that "We aren't going anywhere until our demands are met, @Columbia!!! #cu4palestine".<sup>25</sup>

77. Meanwhile, upon information and belief, the Encampment's leaders, including the student leaders of CUAD, SJP, and JVP, as well as non-Columbia-affiliated persons and organizations, like Kiswani and WOL, continued to encourage harassment of Jewish students, Jewish student groups, and anyone perceived to support them. As a result, Jewish students and others continued to be harassed and assaulted in and around the Encampment.

78. Indeed, during this period, the Director of Columbia's Orthodox Union-Jewish Learning Initiative issued a warning expressing the view that "Columbia University's Public Safety and the NYPD cannot guarantee Jewish students' safety in the face of extreme anti-Semitism and anarchy. It deeply pains me to say that I would strongly recommend you return home as soon as possible and remain home until the reality in and around campus has dramatically

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<sup>25</sup> Aidan Parisi (@AllegedlyAidan, X (Apr. 19, 2024, 1:20 PM), <https://perma.cc/D3AA-BVWX>.

improved.” He lamented, “No one should have to endure this level of hatred, let alone at school.”<sup>26</sup> Several Jewish students sought permission to switch to remote learning because they feared for their safety.

79. On April 20, 2024, Barnard College, an affiliate of Columbia University, suspended at least 53 students for their participation in the Encampment and arrests. Suspended students in college housing were given notice that they were being evicted.

80. On April 22, 2024, student workers at Columbia, led in part by Miner, engaged in another walkout to pressure the University to yield to CUAD’s demands.

81. Upon information and belief, the April 22, 2024, walkout by student workers at Columbia was largely staged and supported by TPF. One day before the walkout, TPF published a message on the social media platform X that said, “Tomorrow, student workers will walk out on the Columbia campus to demand amnesty for student & faculty protesters & divestment from Israeli apartheid. The people of NYC will join them, and rally at the gates of Columbia University to show the world that the people stand with Palestine, and the student movement fighting for liberation!”<sup>27</sup>

82. On April 23, 2024, President Shafik emailed the Columbia community to report that student organizers, members of the faculty, administrators, and the University Senate had been

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<sup>26</sup> Doree Lewak & Isabel Keane, *Columbia Rabbi Warns Jewish Students to Go Home, Don’t Come Back to Campus Because of ‘Extreme Antisemitism’*, N.Y. Post (Apr. 21, 2024), <https://perma.cc/7459-DJWB>.

<sup>27</sup> People’s Forum, Inc. (@PeoplesForumNYC), X (Apr. 21, 2024, 6:53 PM), <https://perma.cc/S98T-BNDH>.

“in dialogue” to “discuss the basis for dismantling the encampment, dispersing, and following university policies going forward.”<sup>28</sup>

83. In response to President Shafik’s email, TPF published a message on the social media platform X that falsely claimed Columbia University was threatening to bring in the National Guard to clear the Encampment.<sup>29</sup>

84. The next day, April 24, 2024, TPF published “A Call for Global Youth Student Battle In Support of Palestinian Resistance and all Solidarity Forces with It: ‘From Columbia University to Palestine, Revolutionary Youth Against Zionism and Imperialism,’” calling “[f]or a global youth student uprising[.]”<sup>30</sup>

**D. When Columbia Orders The Encampment To Disband Because Of Rampant Anti-Semitism, Defendant Parisi Responds, “COLUMBIA WILL BURN.”**

85. Columbia’s negotiations with the leaders of the Encampment ended in failure on April 29, 2024. That day, President Shafik issued a statement to the Columbia community, admitting, “The encampment has created an unwelcoming environment for many of our Jewish students and faculty. External actors have contributed to creating a hostile environment in violation of Title VI.”<sup>31</sup> She therefore called upon the members of the Encampment to disperse voluntarily.

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<sup>28</sup> Press Release, Columbia Univ., Morningside Campus Update (Apr. 23, 2024), <https://perma.cc/2272-G4V5>.

<sup>29</sup> People’s Forum, Inc. (@PeoplesForumNYC), X (Apr. 24, 2024, 12:27 AM), <https://tinyurl.com/3jn9ucbw>.

<sup>30</sup> Press Release, People’s Forum, Inc., *A Call for a Global Youth Student Battle in Support of Palestinian Resistance and All Solidarity Forces with It: “From Columbia University to Palestine, Revolutionary Youth Against Zionism and Imperialism”* (Apr. 24, 2024), <https://perma.cc/WH6P-2D45/>.

<sup>31</sup> Press Release, Columbia Univ., Statement from Columbia University President Minouche Shafik (Apr. 29, 2024), <https://perma.cc/X4UQ-FCN3>.



86. The same day, President Shafik sent a letter to the Encampment saying, “the dialogue between the University and student leaders of the encampment is, regrettably, at an impasse.”<sup>32</sup> The letter continued, “The current unauthorized encampment and disruption on Columbia University’s campus is creating an unwelcoming environment for members of our community.” The letter warned, “If the encampment is not removed, we will need to initiate disciplinary procedures because of a number of violations of university policy.”

87. In bold lettering, President Shafik told the protestors in the Encampment to “Please promptly gather your belongings and leave the encampment. If you voluntarily leave by 2 p.m., identify yourself to a University official, and sign the provided form where you commit to abide by all University policies . . . you will be eligible to complete the semester in good standing . . . as long as you adhere to that commitment.”

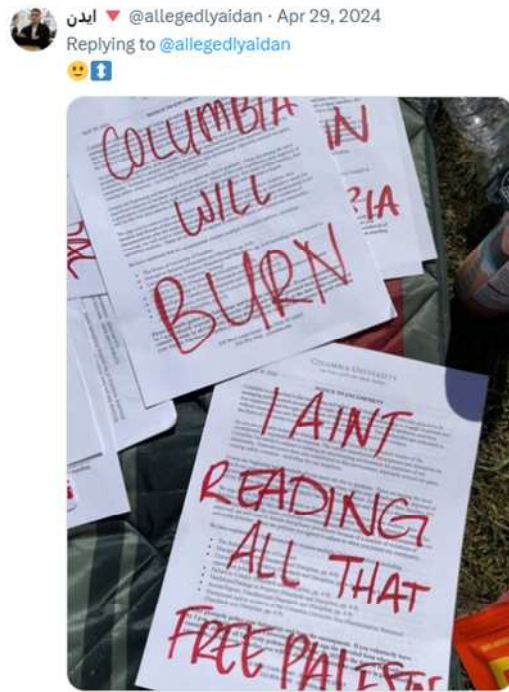
88. The letter further stated that students who already were subject to university discipline (such as Parisi and Curran-Groome) were “not eligible for the arrangements described in the form and may not be eligible to complete the semester in good standing.”

89. Copies of President Shafik’s letter were posted online and on social media. Parisi posted a photo of the letter on the social media platform X with the following handwritten message scrawled over it in bright red letters: “COLUMBIA WILL BURN” and “I AINT (sic) READING ALL THAT FREE PALESTINE.”<sup>33</sup>

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<sup>32</sup> N.Y. Times, *Read the Notice from Columbia Administrators*, N.Y. Times (Apr. 29, 2024), <https://perma.cc/3T4S-HRXG>.

<sup>33</sup> Aidan Parisi (@AllegedlyAidan, X (Apr. 29, 2024, 10:59 AM), <https://perma.cc/Y9QV-BKYE>.



90. In addition to sending a letter to the Encampment, President Shafik sent a letter to the Columbia community. That letter stated, in unequivocal terms, that the “University will not divest from Israel.” It again “urge[d] those in the encampment to voluntarily disperse.”<sup>34</sup>

91. At 11:50 a.m. on April 29, 2024, TPF posted a message to the social media platform X stating, “URGENT! EMERGENCY RALLY FOR COLUMBIA TODAY AT 1PM! Stand with students, stand with Palestine!”<sup>35</sup> The post further stated, “Columbia University administration is threatening students and attempting to suppress the powerful student movement for Palestine. They’re telling students to leave the encampment by 2 PM and turn themselves in or else face disciplinary probation and suspension.” It also stated, “JOIN US TODAY AT 1PM FOR AN

<sup>34</sup> Press Release, Columbia Univ., Statement from Columbia University President Minouche Shafik (Apr. 29, 2024), <https://perma.cc/898H-2TJB>.

<sup>35</sup> People’s Forum, Inc. (@PeoplesForumNYC), X (Apr. 29, 2024, 11:50 AM), <https://perma.cc/ECA5-9P7D>.

EMERGENCY RALLY TO STAND WITH STUDENTS BOLDLY STANDING FOR PALESTINE, DESPITE STATE AND UNIVERSITY ADMINISTRATION’S REPRESSION!”

92. Several hours later, at 2:55 p.m., after Columbia’s 2:00 p.m. deadline had passed for the protestors to disband the Encampment, TPF posted another message to the social media platform X stating, “ALL OUT TO COLUMBIA NOW! The historic movement on university campuses for Palestine, sparked at Columbia isn’t going anywhere! The students, faculty, staff, and community supporters stand with Palestine and with the movement against genocide and apartheid!”<sup>36</sup> The message included a video of Miner in which he purportedly described “What’s happening at Columbia?” and identified himself as the Vice President of UAW 2710.

93. Similarly, WOL posted on its social media accounts a flyer that said “TONIGHT / ALL OUT TO COLUMBIA / STUDENTS ARE CALLING ON US TO PROTECT THE ENCAMPMENT! SHOW UP AS SOON AS YOU ARE ABLE!”<sup>37</sup>

94. Despite Columbia’s ultimatum, the 2:00 p.m. deadline passed and—instead of voluntarily dispersing—hundreds of pro-Hamas demonstrators picketed through Columbia’s campus. The Encampment did not disband, and the occupying protestors did not vacate the lawn. Instead, they made a strategic decision. As several CUAD members and supporters wrote, “Rather than indefinitely continue our encampment and the media circus that surrounded it, we chose to escalate.”<sup>38</sup>

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<sup>36</sup> People’s Forum, Inc. (@PeoplesForumNYC), X (Apr. 29, 2024, 2:55 PM), <https://tinyurl.com/er654xhs>.

<sup>37</sup> Within Our Lifetime (@WOLPalestine), X (Apr. 29, 2024, 12:32 AM), <https://perma.cc/32L4-FBBF>.

<sup>38</sup> *Palestine is the Vanguard for Our Liberation*, 33 Middle E. Critique at 506.

**E. In Ongoing Collaboration, CUAD And Others Decide To Escalate Their Conspiracy To Deprive Jews Of Their Civil Rights By Devising A Plan To Take Over Hamilton Hall.**

95. At approximately 6:45 p.m. on April 29, 2024, TPF hosted an event at its office at 320 West 37th Street, New York, New York. Upon information and belief, TPF had been hosting regularly scheduled meetings for several months prior, during which participants discussed ways in which they could support specific pro-Hamas protests occurring in and around New York City. While public advertising for the April 29th meeting suggested that it was a “Volunteer Meeting” to prepare for “May Day,”<sup>39</sup> upon information and belief, the primary subject for the meeting was to plan the next steps for the protestors at Columbia University in the wake of Columbia’s ultimatum to the Encampment.

96. Upon information and belief, when TPF changed the subject of the April 29, 2024, meeting to focus attention on planning an immediate response to Columbia’s ultimatum, it did so at the request of and in consultation with CUAD, SJP, and JVP. More than 100 individuals attended the meeting at TPF’s office in Manhattan, and countless others attended via Zoom, including many of the named Defendants along with certain of John Does 1 through 40.

97. According to news articles published after the meeting by reporters who attended via Zoom, during the meeting, TPF Executive Director Manolo De Los Santos praised Columbia students for “decid[ing] that resistance is more important than negotiations.” He urged those assembled at TPF’s office to “support our students so that the encampments can go for as long as they can.” He also told attendees, “The moment the call goes out, we have to go back out . . . . We have to be the bodies willing to stand between the police and our students.” The meeting

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<sup>39</sup> People’s Forum, Inc. (@PeoplesForumNYC), X (Apr. 29, 2024, 7:06 AM), <https://perma.cc/N56F-3P48>.

additionally included “break-out sessions that focused on organizing new methods of ‘resistance.’”<sup>40</sup>

98. Upon information and belief, during the meeting at the TPF office and in the hours that followed, a group of co-conspirators, including Defendants Carlson, Parisi, Miner, Curran-Groome, and certain of John Does 1 through 40, solidified and set into motion their coordinated plan to seize Hamilton Hall. These co-conspirators produced and distributed hand-drawn maps and diagrams of Hamilton Hall plus other indicia of a sophisticated and coordinated assault on Hamilton Hall, including but not limited to food and supplies for barricading the building and sustaining the dozens of Occupiers who would storm and occupy the building.

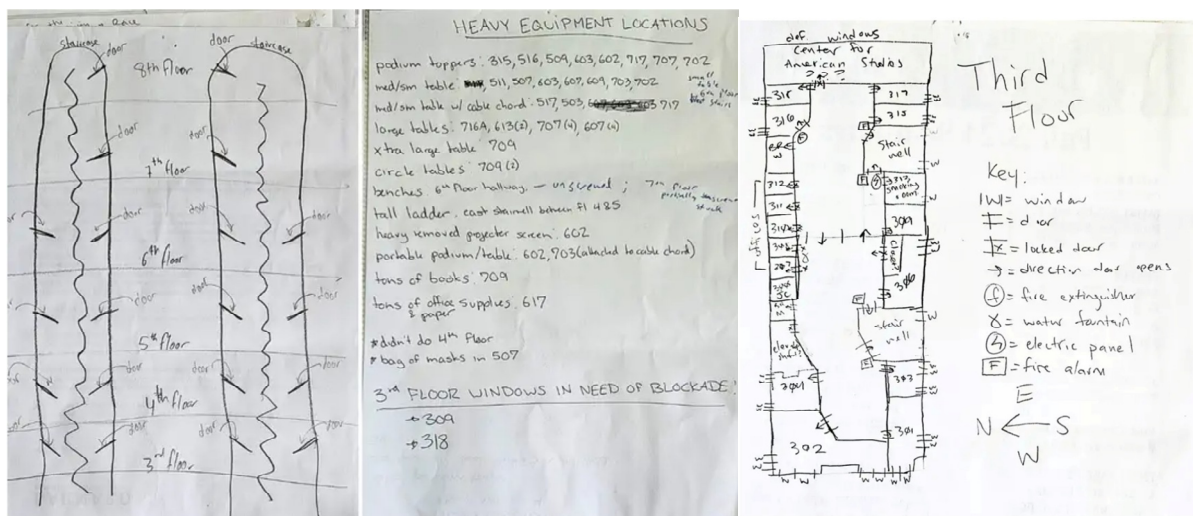
99. Upon information and belief, the co-conspirators addressed the possibility that Columbia employees might be inside Hamilton Hall and agreed that they would, as necessary, intimidate, harass, bribe, threaten, and/or assault and batter such employees if they posed any obstacles to the execution of the plan.

100. Upon information and belief, the plan outlined by the participants in the meeting at TPF’s office on April 29, 2024, followed steps detailed in a guidebook that has been used and disseminated by anti-Israel militants called, *Palestine Action – The Underground Manual* (the “Underground Manual”). The Underground Manual, a guidebook for individuals to engage in criminal and/or terroristic activity, outlines seven steps for any “cell” to “TAK[E] ACTIONS WITHOUT DETECTION AS PART OF PALESTINE ACTION UNDERGROUND.” Step 5 specifically instructs cells to “Make sure you run through your plans right before taking action another time, to make sure everyone is on the same page. Then go for it.”

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<sup>40</sup> Joseph Simonson, *Anti-Israel Group Encouraged Columbia Protesters To Re-Create ‘The Summer of 2020’ Hours Before Students Stormed a Building*, *The Wash. Free Beacon* (May 1, 2024), <https://perma.cc/JD35-G78U>.

101. Indeed, as part of the plan to storm and seize Hamilton Hall, the co-conspirators had compiled information and had drawn maps of Hamilton Hall that identified, *inter alia*, the location of heavy equipment that could be used to fortify the building, including podium topplers, tables, and benches, the location of each door and window on the third floor including certain windows that needed to be blocked to secure the building, and the locations of fire extinguishers, water fountains, and electrical panels.<sup>41</sup> This kind of planning and reconnaissance is advised by the Underground Manual, which, as part of Step 3, instructs cells to “PREPARE FOR ACTION” by “KNOWING YOUR TARGET AND DOING AN EFFECTIVE RECONNAISSANCE (RECCE).”



102. In addition, the Underground Manual, as part of Step 4, instructs individuals participating in the encouraged “criminal and/or terroristic activity” to wear face coverings, dark clothing that is baggy and covers the whole body, and dark shoes. Upon information and belief, similar instructions were communicated to those who would take part in the siege of Hamilton

<sup>41</sup> Brittany Kriegstein, ‘Lock All Windows.’ A Designated ‘Smoking Room’: Inside Columbia Protesters’ Maps and Plans, Gothamist (May 9, 2024), <https://perma.cc/F437-EAM8>.

Hall. Indeed, the directive to wear face coverings is consistent with CUAD's and WOL's ongoing messaging to its members who engage in protests and other pro-Hamas, anti-Israel activity.

103. Later that evening, at 11:27 p.m. on April 29, 2024, TPF published a message on the social media platform X calling for people to “MOBILIZE TO COLUMBIA NOW! The students have asked for community support tonight as they continue to resist the university’s criminalization and repression. We will stand with the students until all of their demands are met! THE PEOPLE ARE WITH PALESTINE!”<sup>42</sup> The post further indicated that there would be a “Rally at midnight: 116th & Broadway” and instructed individuals to “Bring flashlights, water, snacks, and high energy—together our movement is strong and cannot be stopped!”

104. One hour later, rioters had stormed Hamilton Hall. TPF posted another message on the social media site X stating, “RIGHT NOW: The heroic and resilient student organizers at Columbia University have successfully taken and ‘de-occupied’ a building on campus and now they need our support to defend against a possible sweep! We will stand with the students until all of their demands are met!”<sup>43</sup> The post reminded individuals to “Bring flashlights, water, snacks, and high energy—together our movement is strong and cannot be stopped!”

105. One hour after that, at 2:02 a.m. on April 30, 2024, TPF posted another message on the social media site X stating, “DISCLOSE, DIVEST, WE WILL NOT STOP WE WILL NOT REST! We will stay in the streets for Palestine and to support the student movement!”<sup>44</sup> The post

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<sup>42</sup> People’s Forum, Inc. (@PeoplesForumNYC), X (Apr. 29, 2024, 11:27 PM), <https://perma.cc/2T5M-DHD9>.

<sup>43</sup> People’s Forum, Inc. (@PeoplesForumNYC), X (Apr. 30, 2024, 12:40 AM), <https://perma.cc/4D5Y-5ZAB>.

<sup>44</sup> People’s Forum, Inc. (@PeoplesForumNYC), X (Apr. 30, 2024, 2:02 AM), <https://perma.cc/8S4M-W6BK>.

further said that “All day Tuesday, starting at 8AM we will hold a rally to support the students inside Columbia, fighting for Palestine and the end to the funding of apartheid and genocide.”

**F. Defendants Execute Their Plan To Bring The Intifada To Hamilton Hall.**

106. On the night of April 29, 2024, Mr. Torres and Mr. Wilson, both “third shift” janitors, reported to work for their usual overnight shifts in Hamilton Hall. By then they had grown accustomed to the sound of pro-Hamas chanting, shouting, and drumbeats from the Encampment.

107. Shortly after midnight, while Mr. Torres was cleaning the third-floor classrooms, he noticed that the shouting was getting louder and closer. Suddenly he saw a group of masked people in the room with him, and then dozens more masked Occupiers appeared and surrounded him.

108. The rioters who stormed Hamilton Hall were accompanied that night by a freelance photographer, Alex Kent, who photographed much of the Occupation from inside of Hamilton Hall.

109. Two masked John Does demanded that Mr. Torres leave. Mr. Torres refused and told them to get out. They pressed a roll of cash into his hand and said, “This is bigger than you” and “You don’t make enough money for this.” He threw the money on the floor and said, “I don’t want your fucking money.”

110. Mr. Torres was concerned about the safety of his friend and colleague, Mr. Wilson, and was determined to find and help him. But as the Occupiers became more violent and threatening, Mr. Torres realized he needed to escape and demanded that they let him out of the building. He was then told, “It’s over” and “It’s too late.”

111. Meanwhile, Mr. Wilson was cleaning a bathroom on the third floor when he heard a commotion in the hallway. He stepped into the hallway and noticed two or three masked



individuals moving chairs. Suddenly, the hallway was full of people moving chairs from the classrooms down to the lobby. Most were wearing masks and/or other face coverings.

112. An unmasked John Doe wearing a Columbia University shirt approached him and said, “You need to leave.” Mr. Wilson replied to her, “No, you need to leave. I work here.” Mr. Wilson immediately radioed his supervisor and told him that the building was full of rioters and repeatedly asked his supervisor to call the police. Masked John Does began shoving him and ramming furniture into him. As the Occupiers became more violent and threatening, he realized he needed to escape.

113. Mr. Wilson felt trapped. He feared for his life as he was surrounded by masked rioters who were shouting and shoving him.

114. While all of this was happening, Mr. Torres repeatedly called out to Mr. Wilson, who had been working on the same floor when the Occupiers broke into Hamilton Hall. The two men were separated from each other, and Mr. Torres feared for his own life and for Mr. Wilson’s.

115. Mr. Torres began searching for a way out of the building. He opened a window, but decided the jump from the third floor was too dangerous. He realized that he would have to push his way out down the stairs and through the masked mob.

116. Mr. Torres observed that what had initially seemed like chaos was actually highly coordinated. An unmasked woman and a masked man barked orders at the Occupiers, directing them to different areas of Hamilton Hall. Some Occupiers were rushing in with cases of water and food. Others were carrying rolled-up mattresses. Others were carrying tape and rope. Still others appeared to be searching for a specific room and specific windows on the third floor of the building. All the while, Occupiers carried tables and chairs from classrooms and moved vending machines to barricade the building’s entrances and exits from the inside. What was happening in

Hamilton Hall appeared to be the result of significant planning and preparation, as individuals seemed to know exactly where to go and where they could find certain items and equipment inside the building.

117. Mr. Torres felt he was trapped and that his life was in danger. As he attempted to push his way through the mob, John Does struck him and shoved furniture into him. Everywhere he went, he was followed by two masked men, Defendants Yancy and Choi.

118. As Mr. Torres pushed his way through the crowd, he was confronted by Carlson, who was wearing a mask and a navy-blue Columbia hooded sweatshirt, and who began violently shoving Mr. Torres. A group of masked rioters stood by Carlson, including Yancy and Choi.



119. Again, John Does tried to give Mr. Torres money, saying, “You’re a janitor. You don’t make enough money for this.” Mr. Torres again refused and said, “I don’t want your fucking money.” Again, an Occupier shouted, “This is bigger than you!” Then another Occupier shouted, “Why are you defending them?” and “What are you, a Jew-lover?” They repeatedly called him “Jew-lover.”

120. Carlson became more aggressive. He kept shoving Mr. Torres and standing in his way. In the struggle, Mr. Torres managed to remove Carlson's mask along with the hooded sweatshirt. Carlson shouted to the other Occupiers, "How can you let him do that to me?" Carlson's words and actions indicated to Mr. Torres that Carlson had some sort of authority over the mob.



121. Carlson then threatened Mr. Torres, saying, "I'm going to get twenty guys up here to fuck you up." Mr. Torres pulled a fire extinguisher, which was within arm's reach, off the wall to defend himself and replied, "I'll be right here." Carlson then backed away. Throughout this confrontation, Yancy kept striking Mr. Torres from behind. Throughout this confrontation, Carlson, Yancy, and Choi continued to punch Mr. Torres and push him against the wall. As a result of their actions, Mr. Torres sustained upper body injuries.

122. Mr. Torres again called out for Mr. Wilson and, hearing no response, proceeded to push his way through the Occupiers toward one of the exits.

123. When Mr. Torres reached the ground floor of Hamilton Hall, he found that the doors had been sealed shut with zip ties and bike chains and blocked by heavy furniture. He went

to a second exit and found that it was likewise sealed shut with zip ties and bike chains and obstructed with furniture.



124. Not only were the doors to Hamilton Hall blocked by furniture and vending machines from inside the building, but from the outside as well. One set of doors had been blocked by a heavy metal table and bench, which were moved and placed in front of the doors at the instruction of Fithian. Indeed, videos and photographs shared with news outlets show Fithian instructing protestors to move the furniture in front of the doors.



125. Upon information and belief, even though Fithian stayed outside of Hamilton Hall during the siege, she had a material role in coaching, training, and directing the Occupiers on how to storm and seize Hamilton Hall and how to bar the doors so that no one could enter or leave, based on her years of experience agitating and protesting.

126. Finally, Mr. Torres reached an exit that was sealed with zip ties but was not blocked by furniture. He demanded that he be released from the building. Eventually, one of the Occupiers cut the zip ties and let Mr. Torres out.

127. Once outside of Hamilton Hall, Mr. Torres saw what seemed like hundreds of people. In an effort to blend in and escape the crowd, Mr. Torres removed the upper body portion of his uniform. He observed that the Occupiers had taken control of Hamilton Hall and hung a banner emblazoned with the word “INTIFADA” from a third-floor balcony.

128. While Mr. Torres was trying to escape the building, Mr. Wilson began pushing his way downstairs toward the lobby. As he made his way toward the lobby, masked Occupiers, including John Does, pushed and shoved Mr. Wilson and rammed furniture into him. When he finally made it to the lobby, he also found that the doors had been barricaded with furniture. He

began pushing the furniture aside, only to find that the doors had been sealed shut with zip ties and bike chains.

129. Mr. Wilson then ran for an alternative exit but found that it too had been barricaded with furniture and a vending machine. Mr. Wilson stood in the lobby and begged the Occupiers to let him out of the building, saying, “I work here. Let me out.”

130. The Occupiers, including John Does, responded by laughing at Wilson and mocking him. He remembers being told, “You work for the Jews” and “You’re a Zionist.”

131. Eventually, an Occupier opened a door, and Mr. Wilson was physically pushed out of the building. Once outside, he saw Columbia’s Public Safety officers huddled on the wheelchair access ramp just outside of Hamilton Hall. Mr. Wilson told them, “You left us for dead” and “I could have been killed.”

**G. Columbia Allows The NYPD To Enter Hamilton Hall To Restore Order.**

132. After taking over Hamilton Hall, CUAD posted to its social media accounts a public relations release claiming responsibility for the Occupation, referring to it as an “escalation.”<sup>45</sup> The release was titled “Gaza Solidarity Protestors Take Columbia’s Hamilton Hall on 206th Day of Genocide After Columbia Refuses to Divest from Israel.” The release stated, “Protestors have voiced their intention to remain at Hind’s [Hamilton] Hall until Columbia concedes to CUAD’s three demands: divestment, financial transparency, and amnesty.”

133. In an April 30, 2024 letter to the NYPD, President Shafik requested the NYPD’s assistance in clearing the Occupiers from Hamilton Hall and ending the occupation, as well as clearing the Encampment. In that letter, President Shafik wrote, “With the utmost regret, we

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<sup>45</sup> Columbia University Apartheid Divest (@ColumbiaBDS), X (Apr. 30, 2024, 2:07 AM), <https://tinyurl.com/yevnszv>.



request the NYPD's help to clear all individuals from Hamilton Hall and all campus encampments.”<sup>46</sup>

134. President Shafik and Columbia had concluded that “[t]he takeover of Hamilton Hall and the continued encampments raise serious safety concerns for the individuals involved and the entire community. The actions of these individuals are unfortunately escalating.”

135. In that letter, President Shafik and Columbia also concluded that “while the group who broke into the building includes students, it is led by individuals who are not affiliated with the University. The individuals who have occupied Hamilton Hall have vandalized University property and are trespassing.”

136. Accordingly, at around 9:00 p.m. on April 30, 2024, more than 17 hours after rioters first stormed Hamilton Hall, the NYPD arrived on Columbia's campus and began arresting the Occupiers in and around Hamilton Hall.

137. Because the Occupiers had barricaded the entrances to Hamilton Hall, NYPD officers had to build a staircase on Amsterdam Avenue to enter the building through a window. NYPD officers also used four “distraction devices,” described by an NYPD spokesperson as emitting “a very loud bang to distract people,” to enable them to breach the front doors of Hamilton Hall.<sup>47</sup>

138. Once inside, the NYPD began arresting the Occupiers, including Carlson, Parisi, Miner, Curran-Groome, Yancy, Choi, and John Does 1 through 40. Each was subsequently charged with trespassing, but most of those charges were later dismissed. According to a

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<sup>46</sup> Press Release, Columbia Univ., Letter to NYPD – Apr. 30 (Apr. 30, 2024), <https://perma.cc/64FJ-PJGN>.

<sup>47</sup> Dorian Geiger, Steven Vago, Joe Marino & Katherine Donlevy, *Over 100 Arrested as NYPD Cops Dramatically Storm Columbia Campus to Clear Out Anti-Israel Mob*, N.Y. Post (Apr. 30, 2024), <https://perma.cc/TY2U-SF9>.

spokesman for the Manhattan District Attorney’s office, it would have been “extremely difficult” to prove any other criminal charges because the Occupiers had, consistent with the Underground Manual’s directive that “[a] face covering is key,” concealed their identities by wearing masks and had covered security cameras in and around the building.<sup>48</sup>

**H. Plaintiffs Are Suffering From Physical And Psychological Injuries As A Direct And Foreseeable Result Of The Actions Of The Defendants, Including The Occupiers.**

139. In the days immediately following the siege, Columbia allowed Mr. Torres and Mr. Wilson to take three days off to recover from their physical injuries. However, since the Occupation, neither has been able to return to work because of the injuries, particularly PTSD, sustained during and as a result of the attacks and terror they endured during the Occupation.

140. Mr. Torres has exhausted all available sick leave and vacation time. He is no longer receiving a salary from Columbia. He is instead subsisting on interim Workers Compensation payments while his claim is pending before the New York State Workers Compensation Board. These payments are inadequate to pay for his health insurance, his children’s health insurance, utilities, and living expenses. He needs ongoing medical care for PTSD and other physical and psychological ailments that have manifested because of the distress caused by the Occupiers’ conduct.

141. Mr. Wilson has also exhausted all available sick leave and vacation time. He is no longer receiving a salary from Columbia. He is instead subsisting on interim Workers Compensation payments while his claim is pending before the New York State Workers Compensation Board. These payments are inadequate to pay for his rent, utilities, and living expenses. He needs ongoing medical care for PTSD.

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<sup>48</sup> Chelsia Rose Marcius, *Why Bragg Dropped Charges Against Most Columbia Student Protesters*, N.Y. Times (June 23, 2024), <https://perma.cc/CNM5-R6LM>.



**COUNT ONE**  
**(Against All Defendants– Violation of 42 U.S.C. § 1985(3))**

142. Plaintiffs repeat and re-allege all allegations made in the preceding paragraphs as if set forth at length herein.

143. Defendants Carlson, Parisi, Miner, Curran-Groome, People’s Forum, Inc., Fithian, and certain of John Does 1 through 40 are part of a broad pro-Hamas, anti-Semitic network of organizations, groups, and cells that are connected through a largely untraceable underground communications system. Members of this network promote and resort to violent and illegal tactics, and are motivated by invidious discrimination against Jews and supporters of Jews.

144. Defendants conspired for the purpose and intent of depriving, directly and indirectly, the equal protection of the laws, and equal privileges and immunities under the laws, for a targeted class consisting of people who are or are perceived to be Jews or supporters of Jews.

145. The rights, privileges, and immunities that Defendants sought to violate include the right to freedom of movement and the right to be free from racial violence.

146. As part of and in furtherance of the conspiracy, Defendants plotted and agreed to take control of Hamilton Hall not only as a symbolic measure “in the spirit of the ’68 occupation of Hamilton Hall,” but also to wield power and leverage, and to create an atmosphere of terror and submission for those who were in the targeted class as well as anyone who might stand in their way. Their strategy included using threats, intimidation, harassment, assaults, and, if necessary, physical violence to take and maintain control of Hamilton Hall.

147. As part of and in furtherance of the conspiracy, Defendants, including Carlson, Parisi, Miner, Curran-Groome, Fithian, Choi, Yancy, and John Does 1 through 40, directly and intentionally participated in the takeover and Occupation of Hamilton Hall, thereby causing

injuries to Plaintiffs and deprivation of Plaintiffs' equal enjoyment of rights secured by the law to all.

148. On April 29, 2024, Columbia advised CUAD, SJP, JVP, and other members of the Encampment that negotiations were at an impasse, and that the hostile environment created by the Encampment would no longer be tolerated. Columbia thus issued an ultimatum for the Encampment to disband.

149. Upon information and belief, certain of the Defendants, including Carlson, Parisi, Curran-Groome, Miner, Yancy, Choi, and John Does 1 through 40, and other unnamed co-conspirators, including persons affiliated with TPF, met later that day at the TPF office to coordinate and plan their response to Columbia's ultimatum, including an escalation in their tactics.

150. Upon information and belief, those present at the meeting conspired and agreed to seize and hold Hamilton Hall until such time as Columbia acquiesced to CUAD's anti-Zionist, anti-Israeli, and anti-Semitic demands. Moreover, as part of and in furtherance of the conspiracy, through financial and operational support from WESPAC and NSJP, the Occupiers, including certain of the Defendants, purchased supplies needed to seize and hold Hamilton Hall, including such items as rope, zip ties, bike locks, food and water, cots, and other supplies indicating that the Occupiers intended to hold Hamilton Hall for an extended period of time. Their plan included immediately blocking all doors of the building from the inside and outside. Their plan also included intimidating, harassing, bribing, assaulting, and/or battering anyone who might stand in their way, including Columbia employees who might be working inside the building.

151. As part of and in furtherance of the conspiracy, TPF continued to solicit aid on behalf of the planned Occupation through its social media accounts on platforms such as X (f/k/a Twitter), including by advertising to the general public to “MOBILIZE TO COLUMBIA NOW.”

152. That night, as part of and in furtherance of the conspiracy, Carlson, Parisi, Miner, Curran-Groome, Yancy, Choi, Fithian, and other masked members of CUAD, SJP, and JVP returned to Hamilton Hall on Columbia University’s campus to carry out the agreed-upon plan of seizing and holding the building. Carlson, Parisi, Miner, Curran-Groome, Yancy, and Choi were a part of the group that entered and intended to remain inside Hamilton Hall until Columbia acquiesced to CUAD’s demands, while Fithian remained outside to instruct other rioters on how to barricade the outside of Hamilton Hall. Other members of SJP and JVP were a part of both groups, those that entered the building and those that remained outside of the building.

153. As part of and in furtherance of the conspiracy, certain of Defendants, including Carlson, Parisi, Miner, Curran-Groome, Yancy, Choi, and John Does 1 through 40, went in disguise on the premises of another: Hamilton Hall, owned by Columbia University.

154. At the time of the Occupation, Plaintiffs were lawfully on the premises as employees of Columbia University, while none of the Occupiers, including the Defendants, were authorized to enter or occupy Hamilton Hall. The Occupiers, including certain of the Defendants, wore masks, face coverings, and/or other disguises that were intended to conceal their identities during the siege.

155. During the Occupation, Mr. Torres and Mr. Wilson were assaulted, detained against their will, and battered by the Occupiers, including some of the Defendants. Defendants Carlson, Choi, and Yancy, together with several masked individuals whose identities are not known and who are among those named as John Does 1 through 40, physically assaulted Mr. Torres. Several

masked Occupiers, including certain of John Does 1 through 40, physically assaulted Mr. Wilson. The Occupiers also threatened Mr. Torres and Mr. Wilson and harassed them by referring to them as “Jew-lovers,” “working for the Jews,” and “Zionists” because they each refused to support the rioters’ seizure of Hamilton Hall. Furthermore, these Occupiers repeatedly asked Mr. Torres, “Why are you defending them?” Upon information and belief, the Occupiers were motivated by perceptions that Mr. Torres and Mr. Wilson supported Jews and presented potential obstacles to the execution of their plot to take over and occupy Hamilton Hall.

156. As a result of the Occupation of Hamilton Hall, Mr. Torres and Mr. Wilson were each prevented from carrying out his job duties as an employee of Columbia University.

157. As a direct and proximate result of the aforementioned conduct, Plaintiffs have each been injured. Plaintiffs have each suffered severe emotional distress and have been diagnosed with PTSD. Each has incurred medical expenses and other economic damages and will be obligated to expend sums of money for, among other things, further medical care and attention to alleviate his serious and severe psychological and emotional trauma and mental and physical anguish, in an amount to be determined at trial.

**COUNT TWO**  
**(Against All Defendants – Violation of 42 U.S.C. § 1986)**

158. Plaintiffs repeat and re-allege all allegations made in the preceding paragraphs as if set forth at length herein.

159. On April 29, 2024, Columbia advised CUAD, SJP, JVP, and other members of the Encampment that negotiations were at an impasse, that Columbia would not meet CUAD’s demands, and that the hostile environment created by the Encampment would no longer be tolerated. Columbia thus issued an ultimatum for the Encampment to disband.

160. Upon information and belief, certain of the Defendants, including Carlson, Parisi, Miner, Curran-Groome, People's Forum, Inc., Yancy, Choi, John Does 1 through 40, and other unnamed conspirators, including persons affiliated with TPF, met later that day at the TPF office to coordinate and plan their response to Columbia's ultimatum, including a possible escalation in their tactics.

161. Upon information and belief, those present at the meeting conspired to seize and hold Hamilton Hall until such time as Columbia acquiesced to CUAD's anti-Zionist, anti-Israeli, and anti-Semitic demands. Moreover, as part of and in furtherance of the conspiracy, through financial and operational support from WESPAC and NSJP, the Occupiers, including certain of the Defendants, purchased supplies needed to seize and hold Hamilton Hall, including such items as rope, zip ties, bike locks, food and water, cots, and other supplies, indicating that the Occupiers intended to hold Hamilton Hall for an extended period of time. Their plan included immediately blocking all doors of the building from the inside and outside. Their plan also included intimidating, harassing, bribing, assaulting, and/or battering anyone who might stand in their way, including Columbia employees who might be working inside the building.

162. Defendants all had knowledge of the plan to take over Hamilton Hall, had knowledge of the wrongs conspired to be done, and had knowledge that the wrongs were about to be committed.

163. As part of and in furtherance of the conspiracy, TPF continued to solicit aid on behalf of the planned riot through its social media accounts on platforms such as X, including by advertising to the general public to "MOBILIZE TO COLUMBIA NOW."

164. That night, as part of and in furtherance of the conspiracy, Carlson, Parisi, Miner, Curran-Groome, Fithian, Yancy, Choi, John Does, and other masked members of CUAD, SJP, and

JVP returned to Hamilton Hall on Columbia University's campus to carry out the agreed-upon plan of seizing and holding the building. Carlson, Parisi, Miner, Curran-Groome, Yancy, Choi, and John Does 1 through 40 were a part of the group that entered and intended to remain inside Hamilton Hall until Columbia acquiesced to CUAD's demands, while Fithian remained outside to instruct other rioters on how to barricade the outside of Hamilton Hall. Other members of SJP and JVP were a part of both groups, those that entered the building and those that remained outside of the building.

165. As part of and in furtherance of the conspiracy, Defendants went in disguise on the premises of another: Hamilton Hall, owned by Columbia University. At the time of the Occupation, Plaintiffs were lawfully on the premises as employees of Columbia University, while none of the Occupiers, including the Defendants, were authorized to enter or occupy Hamilton Hall. The Occupiers, including certain of the Defendants, wore masks, face coverings, and/or other disguises that were intended to conceal their identities during the siege.

166. During the Occupation, Mr. Torres and Mr. Wilson were assaulted, detained against their will, and battered by the Occupiers, including some of Defendants. The Occupiers, including certain of John Does 1 through 40, also threatened them and harassed them by referring to them as "Jew-lovers," "working for the Jews," and "Zionists" because they each refused to support the Occupiers' seizure of Hamilton Hall. Furthermore, these Occupiers repeatedly asked Mr. Torres, "Why are you defending them?" Upon information and belief, the Occupiers were motivated by perceptions that Mr. Torres and Mr. Wilson supported Jews and Israel and presented potential obstacles to the execution of their plot to take over and occupy Hamilton Hall.

167. Defendants neglected or refused to prevent or aid in preventing the commission of the aforementioned wrongs despite having the power to do so.

168. As a result of the Occupation, Mr. Torres and Mr. Wilson were each prevented from carrying out his job duties as an employee of Columbia University.

169. As a direct and proximate result of the aforementioned conduct, Plaintiffs have each been injured. They have suffered severe emotional distress and have been diagnosed with PTSD. Each has incurred medical expenses and other economic damages and will be obligated to expend sums of money for, among other things, further medical care and attention in an effort to alleviate his serious and severe psychological and emotional trauma and mental and physical anguish, in an amount to be determined at trial.

**COUNT THREE**

**(By Plaintiff Torres Against Defendants James Carlson, Gabriel Yancy, Ethan Choi, and John Does 1–40 – Assault)**

170. Plaintiffs repeat and re-allege all allegations made in the preceding paragraphs as if set forth at length herein.

171. During the Occupiers' siege of Hamilton Hall on April 29 and 30, 2024, Defendants Carlson, Yancy, Choi, and John Does physically attacked Mr. Torres with the intent to cause apprehension of imminent harmful or offensive contact.

172. Among the specific actions taken and intended to be taken by Defendants Carlson, Yancy, Choi, and John Does were to intimidate, threaten, and harass Mr. Torres. This occurred on at least two occasions: first during the initial phase of the siege of Hamilton Hall, and again when Mr. Torres removed Defendant Carlson's mask and hooded sweatshirt, which prompted Carlson to threaten Mr. Torres, saying "I'm going to get twenty guys up here to fuck you up."

173. As a result of the foregoing acts by Defendants Carlson, Yancy, Choi, and John Does, Mr. Torres experienced apprehension of imminent physical harm. Indeed, after Defendant Carlson's specific threat, Mr. Torres grabbed a fire extinguisher from the wall in self-defense.

174. Mr. Torres did not consent to these acts by Defendants Carlson, Yancy, Choi, and John Does.

175. The actions by Carlson, Yancy, Choi, and John Does evince a high degree of moral culpability or demonstrate a wanton or reckless disregard for the rights of Mr. Torres.

176. As a direct and proximate result of Carlson's, Choi's, Yancy's, and John Does' assault, Mr. Torres has suffered in the past, and will continue to suffer in the future, serious and severe psychological and emotional trauma and mental and physical anguish.

177. As a direct and proximate result of the aforementioned assault, Mr. Torres has incurred medical expenses and other economic damages and will be obligated to expend sums of money for, among other things, further medical care and attention in an effort to alleviate his serious and severe psychological and emotional trauma and mental and physical anguish, in an amount to be determined at trial.

178. Mr. Torres has been, and will be for some time to come, unable to pursue his usual activities and employment as a result of the serious and severe psychological and emotional trauma and mental and physical anguish that was caused by the aforementioned assaults.

#### **COUNT FOUR**

**(By Plaintiff Torres Against Defendants James Carlson, Gabriel Yancy, Ethan Choi and John Does 1–40 – Battery)**

179. Plaintiffs repeat and re-allege all allegations made in the preceding paragraphs as if set forth at length herein.

180. During the Occupiers' siege of Hamilton Hall on April 29 and 30, 2024, Carlson, Yancy, Choi, and John Does physically attacked Mr. Torres thereby intentionally initiating bodily contact, offensive in nature.

181. Among the specific actions taken by Carlson, Yancy, Choi, and John Does were to punch Mr. Torres and push him against the wall on the third floor and in the stairwell leading from



the third floor to the second floor of Hamilton Hall, including a confrontation during which Defendant Carlson became aggressive with Mr. Torres, and Mr. Torres fought off Carlson, including by removing Carlson's mask and hooded sweatshirt.

182. As a result of the foregoing acts by Carlson, Yancy, Choi, and John Does, Mr. Torres experienced bodily contact offensive in nature from Defendants Carlson, Yancy, Choi, and John Does which caused physical and psychological injuries, including, but not limited to PTSD and upper body injuries.

183. Mr. Torres did not consent to these acts by Carlson, Yancy, Choi, and John Does.

184. The actions by Carlson, Yancy, Choi, and John Does evince a high degree of moral culpability or demonstrate a wanton or reckless disregard for the rights of Mr. Torres.

185. As a direct and proximate result of Carlson's, Choi's, Yancy's, and John Does' batteries, Mr. Torres has suffered in the past, and will continue to suffer in the future, serious and severe psychological and emotional trauma and mental and physical anguish.

186. As a direct and proximate result of the aforementioned batteries, Mr. Torres has incurred medical expenses and other economic damages and will be obligated to expend sums of money for, among other things, further medical care and attention in an effort to alleviate his serious and severe psychological and emotional trauma and mental and physical anguish, in an amount to be determined at trial.

187. Mr. Torres has been, and will be for some time to come, unable to pursue his usual activities and employment as a result of the serious and severe psychological and emotional trauma and mental and physical anguish that was caused by the aforementioned batteries.

**COUNT FIVE**

**(By Plaintiff Wilson Against Defendants John Does 1–40 – Assault)**

188. Plaintiffs repeat and re-allege all allegations made in the preceding paragraphs as if set forth at length herein.

189. During the Occupiers’ siege of Hamilton Hall on April 29 and 30, 2024, Defendants John Does physically attacked Mr. Wilson with the intent to cause apprehension of imminent harmful or offensive contact.

190. Among the specific actions taken and intended to be taken by Defendants John Does were to intimidate, threaten, and harass Mr. Wilson. This occurred throughout the siege of Hamilton Hall, when masked individuals pushed and shoved Mr. Wilson and repeatedly rammed furniture into his body.

191. As a result of the foregoing acts by Defendants John Does, Mr. Wilson experienced apprehension of imminent physical harm.

192. Mr. Wilson did not consent to these acts by Defendants John Does.

193. The actions by John Does evince a high degree of moral culpability or demonstrate a wanton or reckless disregard for the rights of Mr. Wilson.

194. As a direct and proximate result of John Does’ assault, Mr. Wilson has suffered in the past, and will continue to suffer in the future, serious and severe psychological and emotional trauma and mental and physical anguish.

195. As a direct and proximate result of the aforementioned assault, Mr. Wilson has incurred medical expenses and other economic damages and will be obligated to expend sums of money for, among other things, further medical care and attention in an effort to alleviate his serious and severe psychological and emotional trauma and mental and physical anguish, in an amount to be determined at trial.

196. Mr. Wilson has been, and will be for some time to come, unable to pursue his usual activities and employment as a result of the serious and severe psychological and emotional trauma and mental and physical anguish that was caused by the aforementioned assaults.

**COUNT SIX**

**(By Plaintiff Wilson Against Defendants John Does 1–40 – Battery)**

197. Plaintiffs repeat and re-allege all allegations made in the preceding paragraphs as if set forth at length herein.

198. During the Occupiers' siege of Hamilton Hall on April 29 and 30, 2024, Defendants John Does physically attacked Mr. Wilson thereby intentionally initiating bodily contact, offensive in nature.

199. Among the specific actions taken by Defendants John Does were to push and shove Mr. Wilson and to ram furniture into him.

200. As a result of the foregoing acts by Defendants John Does, Mr. Wilson experienced bodily contact offensive in nature from Defendants John Does, which caused physical and psychological injuries, including, but not limited to PTSD and upper body injuries.

201. Mr. Wilson did not consent to these acts by Defendants John Does.

202. The actions by John Does evince a high degree of moral culpability or demonstrate a wanton or reckless disregard for the rights of Mr. Wilson.

203. As a direct and proximate result of John Does' batteries, Mr. Wilson has suffered in the past, and will continue to suffer in the future, serious and severe psychological and emotional trauma and mental and physical anguish.

204. As a direct and proximate result of the aforementioned batteries, Mr. Wilson has incurred medical expenses and other economic damages and will be obligated to expend sums of money for, among other things, further medical care and attention in an effort to alleviate his

serious and severe psychological and emotional trauma and mental and physical anguish, in an amount to be determined at trial.

205. Mr. Wilson has been and will be unable for some time to come, to pursue his usual activities and employment as a result of the serious and severe psychological and emotional trauma and mental and physical anguish that was caused by the aforementioned batteries.

**COUNT SEVEN**

**(Against Defendants James Carlson, Aidan Parisi, Grant Miner, Catherine Curran-Groome, Lisa Fithian, Ethan Choi, Gabriel Yancy, and John Does 1–40 –  
Intentional/Reckless Infliction of Emotional Distress)**

206. Plaintiffs repeat and re-allege all allegations made in the preceding paragraphs as if set forth at length herein.

207. On April 29 and 30, 2024, Occupiers, including Carlson, Parisi, Curran-Groome, Yancy, Choi, along with other masked individuals, illegally entered Hamilton Hall to seize the building and convert it to a stronghold for the protestors in the wake of Columbia's message to protestors to vacate the Encampment. Once inside, the Occupiers, which included Carlson, Parisi, Curran-Groome, Yancy, Choi, and John Does 1 through 40, began unloading supplies, including cots and food, into one of the third-floor classrooms, as upon information and belief, the Occupiers intended to remain inside of Hamilton Hall until Columbia met their demands.

208. In addition, the Occupiers, including Carlson, Parisi, Curran-Groome, Yancy, Choi, and certain of John Does 1 through 40 moved heavy objects, including furniture, vending machines, and barricades to block the building's entrances and exits, and locked the building's front door with zip ties and bike chains so that no one could easily enter or leave the building.

209. Meanwhile, outside the building, individuals including Fithian instructed other individuals, including, upon information and belief, members of CUAD, SJP, and JVP, to relocate

heavy objects, such as barricades and metal outdoor furniture, to block the entrances of Hamilton Hall from the outside to further restrict access into and out of the building.

210. Upon information and belief, the Occupiers, including Carlson, Parisi, Curran-Groome, Yancy, Choi, and John Does 1 through 40, along with Fithian were aware that Columbia's janitorial staff, including Plaintiffs, would likely be working inside of Hamilton Hall at the time of the siege. Indeed, the Occupiers prepared themselves to encounter maintenance staff. For example, they brought with them substantial amounts of U.S. currency to offer to Plaintiffs and/or other Columbia employees as a bribe to leave the building. This was consistent with their plan to use a variety of tactics to neutralize anyone who might stand in their way, including Columbia employees who might be working inside the building.

211. Upon encountering Plaintiffs inside Hamilton Hall, certain of the Occupiers, including Carlson, Yancy, Choi, and other masked John Does, demanded that Plaintiffs leave the building even after they knew that the exits had been barricaded. These Occupiers also threatened, harassed, and mocked Plaintiffs including by calling them "Jew-lovers," "Jew-workers," and "Zionists," and by saying Plaintiffs were "working for the Jews." Furthermore, these Occupiers repeatedly asked Mr. Torres, "Why are you defending them?"

212. Defendants' actions in connection with the Occupation, including their harassment of Plaintiffs on April 29 and 30, 2024, were extreme and outrageous, and exceeded all reasonable bounds of decency tolerated by the average member of the community.

213. Indeed, Defendants' actions evince a high degree of moral culpability or demonstrate a wanton or reckless disregard for the rights of Plaintiffs.

214. Defendants were aware that Columbia employees, including Plaintiffs, would likely be working inside Hamilton Hall at the time of the Occupation, and they disregarded the

substantial probability that the Occupation, including locking Plaintiffs inside Hamilton Hall, restricting their ability to leave Hamilton Hall, and threatening and harassing them, would cause Plaintiffs severe emotional distress and cause them to fear for their lives.

215. As a direct and proximate result of the aforementioned conduct, Plaintiffs have each experienced severe emotional distress and have been diagnosed with PTSD. Each has incurred medical expenses and other economic damages and will be obligated to expend sums of money for, among other things, further medical care and attention in an effort to alleviate his serious and severe psychological and emotional trauma and mental and physical anguish, in an amount to be determined at trial.

**PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiffs respectfully request that the Court enter judgment in their favor as follows:

- A. Compensatory, consequential, and punitive damages in amounts to be determined at trial;
- B. Reasonable attorneys' fees in accordance with 42 U.S.C. § 1988;
- C. Pre-judgment interest and post-judgment interest at the maximum rate allowable by law; and
- D. Such other and further relief as the Court deems just and proper.

**DEMAND FOR TRIAL BY JURY**

Plaintiffs demand trial by jury on all issues so triable in this action.

Dated: April 25, 2025

THE LOUIS D. BRANDEIS CENTER FOR  
HUMAN RIGHTS UNDER LAW

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