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10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF LOS ANGELES

12
13 THE LOUIS D. BRANDEIS CENTER
COALITION TO COMBAT ANTI-SEMITISM,
14 INC., MELISSA ALEXANDER, on behalf of
herself and her minor child, IVY CHESSER, and
15 her son Y.Z., ILANA PEARLMAN, on behalf of
herself and her minor children, DAWN AND
16 MICHAEL ROSENTHAL, on behalf of
themselves and their minor child, and JOHN
17 AND JANE SMITH, on behalf of themselves
and their minor child,

18 Plaintiffs,

19 v.

20 STATE OF CALIFORNIA, STATE BOARD
21 OF EDUCATION, CALIFORNIA
DEPARTMENT OF EDUCATION, TONY
22 THURMOND, in his official capacity as State
Superintendent of Public Instruction, and ROES
23 1-10, inclusive,

24 Defendants.

Case No.:
Hon.
Dept.:

**COMPLAINT FOR DECLARATORY
RELIEF, INJUNCTIVE AND OTHER
EQUITABLE RELIEF**

1 Plaintiffs The Louis D. Brandeis Center Coalition to Combat Anti-Semitism, Inc., on
2 behalf of its members, and Melissa Alexander, Ilana Pearlman, Dawn and Michael Rosenthal,
3 and John and Jane Smith¹ on behalf of themselves and their minor children, and Ivy Chesser and
4 her son Y.Z.² (collectively, “Plaintiffs,” and their children specifically, “Student Plaintiffs”),
5 bring this action against defendants the State of California (“the State”), the State Board of
6 Education, the California Department of Education (“CDE”), Tony Thurmond, in his official
7 capacity as State Superintendent of Public Instruction (“State Superintendent”), and ROES 1-10
8 (collectively, “Defendants”), and allege as follows:

9 INTRODUCTION

10 1. Plaintiffs urgently need this Court’s intervention because Defendants have failed
11 to ensure that the treatment of Jewish students in California’s public schools conforms to the
12 laws of California, rather than the standards of the European Middle Ages or the Soviet Union.
13 Just a few examples of what Defendants’ inaction and half-measures have allowed: a seventh
14 grader, after speaking in Hebrew, was chased by two boys shouting, “We want you to die”—and
15 her school did nothing. A seventh-grade teacher abused her power to make false allegations of
16 misconduct and punish her twelve-year-old student because he was a Jew who dared to wear
17 Jewish and Israeli symbols. Jewish students are segregated and pulled out of classes so that
18 teachers can spew anti-Israel and anti-Semitic propaganda without pushback. A mother who had
19 the courage to speak at a school board meeting about how Jewish children are called “kikes” and
20 “dirty Jews” at school was then herself called a “Zionist Nazi bitch” and drowned out by a
21 school employee who made grotesque farting sounds at the meeting. And this just scratches the
22 surface.

23 2. Sadly, the direct attacks on Jewish students and parents are not the only sign that
24 California’s schools echo dark chapters of history. Defendants have allowed California’s schools
25 to indoctrinate children, from the earliest ages, to believe that Jewish Americans and Israelis—

26
27 ¹ “John and Jane Smith” are pseudonyms for two parents who, for safety and privacy concerns,
will not be using their legal names in this filing.

28 ² “Y.Z.” is a pseudonym for Ivy Chesser’s son who, for safety and privacy concerns, will not be
using his legal name in this filing.

1 including Jewish and Israeli classmates—are racists, white supremacists, and oppressors who
2 should be shunned. Some school districts have allowed this kind of hateful indoctrination to
3 occur, while others have expressly condoned or even promoted it. The entirely foreseeable (and
4 perhaps intended) consequence of this indoctrination is that Jewish and/or Israeli children and
5 children perceived as Jewish and/or Israeli are bullied and excluded by their peers and targeted
6 by their teachers, who silence, mock, or punish them if they speak out.

7 3. None of this conduct is permitted by the laws of California, a state that is proud of
8 its reputation for offering broad civil rights protection. California law is chock-full of guarantees
9 of equality and prohibitions on discrimination. The California Constitution explicitly provides
10 that the State is obligated to provide its students with educational equality that meets prevailing
11 statewide standards. The California legislature has likewise enshrined the right of every child in
12 California to an education free from discrimination and bias. The California Education Code
13 includes numerous provisions forbidding public schools from discriminating on the basis, *inter*
14 *alia*, of nationality, race, ethnicity, or religion. Statutes prohibit textbooks or instructional
15 materials “that contain any matter reflecting adversely upon persons on the basis of race or
16 ethnicity, gender, religion, disability, nationality, or sexual orientation,” among other things. *See*,
17 *e.g.*, Cal. Ed. Code. § 51501(a). California’s civil rights laws, including California Government
18 Code, § 11135, provide that no one in California may be “unlawfully denied full and equal
19 access to the benefits of, or be unlawfully subjected to discrimination under, any program or
20 activity” offered by state and local agencies, including schools.

21 4. In fact, California recently recognized the urgent and critical problem of anti-
22 Semitism in California classrooms by enacting a new law, Assembly Bill 715 (“AB 715”).
23 Section 1 of AB 715 confirms that “[i]t has been well documented that Jewish and Israeli
24 American pupils across California are facing a widespread surge in antisemitic discrimination,
25 harassment, and bullying. In many cases, such discrimination, harassment, and bullying has been
26 so severe and pervasive that it has placed Jewish pupils at risk and limited, or completely
27 impeded, their ability to learn or engage in school programs or activities.” As California’s
28 legislature further observes, “This discrimination, harassment, and bullying, including the use of

1 inappropriate instructional materials and instruction, has deeply impacted Jewish pupils across
2 California and the nation resulting in the vilification and ostracization of Jewish pupils.”

3 5. The problem—and the reason that Plaintiffs require relief from this Court—is that
4 these numerous and lofty guarantees of equality are not being enforced by the State, including its
5 relevant agencies, departments, or leaders. Jewish parents, including those among the Plaintiffs,
6 have already filed hundreds of Uniform Complaint Procedures (“UCP”) and CDE complaints
7 and appeals reporting harassment, discrimination, bullying, and biased teaching materials—in
8 short, a hostile environment for Jewish children. Yet, the often glacial and opaque administrative
9 process and entirely toothless remedies imposed, even when serious discrimination is found,
10 have proven entirely inadequate for the task of remedying anti-Semitism in California’s public
11 schools. There is state-wide rot in California’s educational system, and it requires the State and
12 its top brass to address the pervasive anti-Semitic discrimination. But while Defendants are
13 obligated to take action, they are standing idly by or are mismanaging the discharge of their
14 constitutional and statutory duties when anti-Semitism is present.

15 6. No student should face discrimination in California’s public schools—whether
16 they wear a star or a cross, a keffiyeh or a tallit, a kippah or a hijab, or a dastār, whether they feel
17 or express connection to the land of Israel or any other place of religious or ancestral
18 significance. The people of the State of California have enshrined that promise in California’s
19 Constitution, but Defendants are falling woefully short of keeping it.

20 7. What is required, therefore, is what Plaintiffs seek: declaratory and injunctive
21 relief to mandate that Defendants stop anti-Semitic discrimination in California’s schools, by
22 investigating and addressing past acts of misconduct, taking proactive measures to stop future
23 discrimination, and forbidding California’s schools from being commandeered as centers of anti-
24 Semitic indoctrination.

25 **JURISDICTION**

26 8. The Superior Court for the State of California, County of Los Angeles, has
27 personal jurisdiction over Defendants because they are domiciled in the State of California and
28 the conduct giving rise to this action occurred in the State of California. Cal. Civ. Proc. Code

1 § 410.10.

2 9. The Court has subject matter jurisdiction over this action pursuant to Article VI,
3 Section 10 of the California Constitution.

4 10. Venue is proper in this County pursuant to the California Code of Civil Procedure
5 Sections 393, 395, and 401.

6 **PARTIES**

7 11. Plaintiff The Louis D. Brandeis Center Coalition to Combat Anti-Semitism, Inc.
8 (the “Coalition”) is a Virginia-incorporated, independent nonprofit corporation, operating
9 pursuant to Section 501(c)(3) of the Internal Revenue Code. As of today, it has almost 400
10 members. The Coalition brings this suit on behalf of itself, its members, and the public interest of
11 California. The Coalition seeks to “eliminate anti-Semitism and defend the civil and human
12 rights of the Jewish people and promote justice for all.” The Coalition “represents and protects
13 its members and allies who have or are experiencing anti-Semitic harassment or discrimination,
14 not only on the basis of religious practice, but also on the basis of shared ancestry and ethnicity,
15 including Zionism.”³ The Coalition has expended funds and resources in furtherance of this
16 work. The Coalition’s members include Jewish and Israeli K-12 students, teachers, parents,
17 community members, and other individuals who have personally been aggrieved by, or have by
18 association been impacted by, anti-Semitism and discrimination in higher education and K-12
19 schools. Coalition members include parents of children who attend or have attended public K-12
20 schools all over California. They represent diverse communities and perspectives but share
21 similar experiences of anti-Semitic bias and discrimination in California’s public schools. The
22 reforms that the Coalition is seeking are systemic in nature and not limited to any one individual
23 member. Defendants’ failure to ensure that California schools are free of anti-Semitic
24 discrimination adversely affects the Coalition and its members. The Coalition may also bring this
25 suit on behalf of its members because the Coalition includes members who would otherwise be
26 entitled to bring this suit in their own right, because the interests that the Coalition seeks to
27

28 ³ See The Louis D. Brandeis Center Coalition to Combat Anti-Semitism, *Membership Application*, <https://ldbcoalition.org/membership-application/>.

1 protect in this litigation are germane to its purpose, and because neither the claims asserted nor
2 the relief sought here are unique to the Coalition members and therefore do not require the
3 participation of each Coalition member.

4 12. Plaintiff Melissa Alexander brings this suit on behalf of herself and her minor son,
5 B.A., a seventh grader at Louis Armstrong Middle School in Los Angeles. B.A.'s teacher
6 targeted B.A. with unwarranted discipline and falsified and/or trumped-up allegations of
7 misconduct because B.A. regularly wore Israel-related shirts and a Jewish star necklace to class.
8 Ms. Alexander made the school administrators aware of these issues, but the only option the
9 school offered was to segregate B.A. and upend B.A.'s schedule in the middle of the school year.

10 13. Plaintiffs Ivy Chesser and her son Y.Z. bring this suit based on their experiences
11 in the Campbell Union High School District. Since October 7, 2023, when she began raising
12 concerns about teachers peddling anti-Semitism in lessons and at sanctioned student activities at
13 Y.Z.'s school, Ms. Chesser has been ignored, dismissed, or offered only paltry solutions that
14 reflect a tolerance for anti-Semitism. She has filed multiple UCP complaints and appeals. With a
15 single exception, the UCP process has failed to provide timely or satisfactory recourse.

16 14. Plaintiff Ilana Pearlman brings this suit on behalf of herself and her school-age
17 children, A.D., B.D., and C.D.⁴ All three of Ms. Pearlman's school-age children formerly
18 attended Berkeley Unified schools, but last year, she and her husband felt compelled to pull her
19 two youngest out of the system and place them in Jewish private schools to protect her family
20 from harassment and biased anti-Semitic learning environments. Her oldest child, A.D., remains
21 in Berkeley Unified but has chosen to downplay and hide his Jewish identity to be less of a target
22 to both students and teachers.

23 15. Plaintiffs Dawn and Michael Rosenthal bring this suit on behalf of themselves and
24 their minor son, B.R., a student at Los Angeles's Daniel Pearl Magnet High School. B.R. was
25 forced to withdraw from his honors chemistry class after weeks of B.R.'s teacher insisting on
26 hanging a "Free Palestine" poster and writing mocking, anti-Semitic rhetoric on the classroom
27

28 ⁴ "A.D.," "B.D.," and "C.D." are pseudonyms for Ms. Pearlman's children, who, for safety and
privacy concerns, will not be using their legal names in this filing.

1 whiteboard to celebrate the anniversary of October 7, 2023, the deadliest day for Jews since the
2 Holocaust. The school and the district had been well aware for months of the teacher's conduct,
3 but their answer was to segregate B.R. and punish him by effectively forcing him to take a non-
4 honors version of the course online, depriving him of both in-person instruction and the honors-
5 level class.

6 16. Plaintiffs John and Jane Smith bring this suit on behalf of themselves and their
7 minor daughter, J.S.,⁵ who has faced a series of physical and verbal anti-Semitic attacks at J.S.'s
8 middle school in San Bernardino County, including being choked by another student. The Smiths
9 raised their concerns promptly with senior school officials, but the school stonewalled them. As a
10 result of the anti-Semitic attack, J.S. experienced months of mental health struggles including
11 trauma-related anxiety, insomnia, hypervigilance, and nightmares. To this day, J.S. continues to
12 experience hypervigilance and trauma intrusions when triggered by reminders of the attack. Her
13 trust and sense of safety at school have been permanently eroded. J.S. was not offered any
14 mental health support by the school after the anti-Semitic attacks.

15 17. All of the Plaintiffs and members of the Coalition affected by anti-Semitism in
16 California's public schools share a common identity connected to Judaism. They—like the
17 majority of Jews in America⁶—also have an inextricable bond to the land of Israel, where
18 Judaism was born over 3,000 years ago, where Jews have continued to live ever since, and where
19 many diaspora Jews have prayed for centuries to return. For those Plaintiffs and members who
20 are religiously observant, the connection to Israel is not only a feature of their Jewish ancestral
21 identity but also a core tenet of their sincerely-held religious beliefs and practice. Calls to
22 eliminate the State of Israel as a Jewish state (and, by implication, all of its Jewish inhabitants) or
23 to make it a pariah among nations threaten both their Jewish identity and their religious practice.

24 ⁵ "J.S." is a pseudonym for the Smiths' daughter, who, for safety and privacy concerns, will not
25 be using her legal name in this filing.

26 ⁶ American Jewish Committee, *AJC Survey Shows American Jews are Deeply and Increasingly*
27 *Connected to Israel* (June 10, 2024), <https://www.ajc.org/news/ajc-survey-shows-american-jews-are-deeply-and-increasingly-connected-to-israel>; see also American Jewish Committee, *The*
28 *State of Antisemitism in America 2024* (last visited Feb. 18, 2026), <https://www.ajc.org/AntisemitismReport2024#:~:text=35%25%20of%20American%20Jewish%20college,because%20of%20their%20Jewish%20identity.>

1 Israeli members face an additional form of discrimination on the basis of their national origin.

2 18. Defendant the State of California is the legal and political entity with plenary
3 responsibility for educating all California public school students, including the responsibility to
4 establish and maintain the system of common schools and free education under Article IX,
5 Section 5 of the California Constitution, and to ensure that all California public school students
6 receive their individual and fundamental right to an equal education under the equal protection
7 clauses of the California Constitution, Article I, Section 7(a), and Article IV, Section 16(a).

8 19. Defendant CDE is the department of the California state government responsible
9 for administering and enforcing the laws related to education. Cal. Educ. Code § 33308. Pursuant
10 to this authority, the CDE has the authority to investigate and prosecute actions concerning “[a]ll
11 matters relating to the business activities and subjects under the jurisdiction of the department,”
12 “[vi]olations of any law or rule or order of the department,” and “other matters as may be
13 provided by law.” Cal. Gov. Code § 11180; Cal. Educ. Code § 33304. California law gives a
14 department head broad authority to act pursuant to an investigation of unlawful activity. Cal.
15 Gov. Code § 11181.

16 20. Defendant State Board of Education and its members are responsible for
17 determining the policies governing California’s schools and for adopting rules and regulations
18 for the supervision and administration of all local school districts. Cal. Educ. Code §§ 33030-32.
19 The State Board of Education is the “governing and policy determining body” for the CDE and
20 the body through which the CDE “shall be administered.” Cal. Educ. Code § 33301(a).

21 21. Defendant Tony Thurmond, sued in his official capacity, is the State
22 Superintendent of Public Instruction. In this role, he is obligated to take all necessary steps to
23 ensure that school districts comply with California’s Constitution and laws. *See* Cal. Educ. Code,
24 § 33111. Pursuant to California Education Code, §§ 33301-03, Defendant Thurmond is the
25 Director of Education in whom all executive and administrative functions of the CDE are vested.
26 Additionally, pursuant to the foundational authority for the UCP system itself, California
27 Education Code Section 33315(a) requires that “[t]he Superintendent shall establish and
28 implement a system of complaint processing, known as the Uniform Complaint Procedures,”

1 thereby imposing a mandatory duty on the Superintendent to not merely create but also
2 implement and maintain a functioning, legitimate complaint system. State regulations provide
3 that “the Superintendent of Public Instruction is responsible for providing leadership to local
4 agencies to ensure that the requirements of . . . [numerous] nondiscrimination laws and their
5 related regulations are met in educational programs.” Cal. Code Regs. tit. 5, § 4902.

6 22. Plaintiffs do not presently know the names or capacities of other Defendants
7 responsible for the wrongs described in this Complaint, but on information and belief, allege
8 there are others who are also responsible for and proximately caused some portions of the harms
9 Plaintiffs have suffered. Pursuant to California Code of Civil Procedure Section 474, Plaintiffs
10 sue such Defendants under the fictitious names “Roes 1–10,” inclusive. When their true names
11 and capacities are ascertained, Plaintiffs will amend this Complaint by inserting their names and
12 capacities herein.

13 FACTUAL ALLEGATIONS

14 I. DEFENDANTS PERMIT ANTI-SEMITISM TO FLOURISH IN 15 CALIFORNIA’S K-12 PUBLIC SCHOOLS.

16 A. California School Teachers and Administrators Have Enabled Anti- 17 Semitic Bullying, Harassment, and Violence to Flourish Against 18 Jewish Students.

19 23. In April 2024, California Governor Gavin Newsom reported that anti-Semitism in
20 California has “proliferated at a shocking speed in recent years,” noting that “Jewish people
21 make up about 3% of California’s population, but anti-Jewish hate crimes accounted for 62.4%
22 of all reported hate crimes involving religious bias in the state in 2022 . . . and violence and
23 threats have escalated since the terrorist attacks in Israel on October 7th.”⁷ Despite Governor
24 Newsom pledging to “combat[] antisemitism in K-12 schools,”⁸ anti-Semitism continues to rise,
25 with Defendants failing to take any meaningful action to stop it. Sadly, there are myriad
26 examples across the state of how anti-Semitism has flourished in public schools in the wake of

26 ⁷ Gavin Newsom, *Golden State Plan to Counter Antisemitism*, at 1 (2024),
27 [https://www.gov.ca.gov/wp-content/uploads/2024/04/Golden-State-Plan-to-Counter-
28 Antisemitism.pdf](https://www.gov.ca.gov/wp-content/uploads/2024/04/Golden-State-Plan-to-Counter-Antisemitism.pdf).

⁸ *Id.* at 11.

1 the October 7th terrorist attacks.

2 24. As the May 2023 U.S. National Strategy to Counter Anti-Semitism recognizes,
3 American schools are the epicenter of attacks on Jewish ethnic identity and religious practice.
4 “Jewish students and educators are targeted for derision and exclusion on college campuses,
5 often because of their real or perceived views about the State of Israel . . . When Jews are
6 targeted because of their beliefs or their identity, when Israel is singled out because of anti-
7 Jewish hatred, that is antisemitism.”⁹ This is exactly what is happening in California’s K-12
8 schoolrooms, where anti-Semitic bias and discrimination are targeting schoolchildren.

9 25. California teachers are too often not only the enablers but the perpetrators of anti-
10 Semitic attacks against Jewish and Israeli students under their charge. In or around the fall of
11 2025, a teacher of Melissa Alexander’s 12-year-old son, B.A., began concocting inflated or
12 altogether fabricated allegations against him, such as accusing B.A. of being too loud in class or
13 on the bus or saying B.A. did something “egregious and dangerous”—but when Ms. Alexander
14 asked what specifically B.A. had done, the teacher said it did not matter. This teacher also gave
15 B.A. marks of “Unsatisfactory” without cause and threatened that B.A. would not be able to
16 matriculate to eighth grade if she felt B.A. deserved that punishment. None of B.A.’s other
17 teachers raised concerns about his behavior, and aside from the class with this teacher, B.A. was
18 a straight-A student.

19 26. The unfounded discipline and punishment were not only cruel to B.A. but also
20 baffling—except for the fact that this teacher had openly proclaimed that Zionists are the enemy.
21 Ms. Alexander saw that the teacher had a public social media account filled with virulently anti-
22 Semitic and anti-Israel content and conduct, including boasting about participating in the anti-
23 Israel, anti-Semitic encampment at UCLA that barred Jewish students and other community
24 members from entering campus spaces. B.A. regularly wore Israel-related t-shirts to school and a
25 Jewish star necklace. Ms. Alexander also discovered at least five other families whose children
26 experienced the same mistreatment by this teacher, and all are Jewish. It was painfully clear to

27
28 ⁹ The White House, *The U.S. National Strategy to Counter Antisemitism*, at 9 (2023),
<https://bidenwhitehouse.archives.gov/wp-content/uploads/2023/05/U.S.-National-Strategy-to-Counter-Antisemitism.pdf>.

1 Ms. Alexander that this teacher’s unwarranted targeting of B.A. was because he was openly
2 Jewish and, as part of his Jewish ancestral identity, connected to Israel.

3 27. Ms. Alexander brought evidence of the teacher’s anti-Semitic social media posts
4 to the school administrators along with the reports of the mistreatment of B.A., but the school
5 administration actively chose to ignore it. When she raised concerns that B.A. was being unfairly
6 disciplined and given lower grades because of his Jewish identity, which includes supporting
7 Israel, the principal said the teacher was entitled to her own opinion on grades. Despite the
8 evidence that a teacher who posted anti-Semitic and anti-Israel content was abusing her power to
9 make trumped-up allegations against Jewish adolescents, the school did nothing to address the
10 vile and unlawful mistreatment of Jewish students.

11 28. Instead, B.A. was effectively punished with the school segregating him and
12 putting him into new classes in the middle of the school year. This response in and of itself is
13 unacceptable and unlawful. But the devastating ramifications have continued. B.A. refuses to
14 wear his Jewish star necklace and will not even wear his Jewish camp shirts at school. B.A. cries
15 nearly every day over school. This experience made B.A. not only reluctant to talk about
16 Judaism generally, but to talk in class about his Jewish summer camp, Shabbat dinners, or other
17 Jewish aspects of his life. Now, as a direct result of the unchecked anti-Semitism by B.A.’s
18 teacher and the school’s outrageous, apathetic response, the family is trying to gain access to a
19 private school.

20 29. Approximately one week after October 7, 2023, Ilana Pearlman’s ninth grade son,
21 A.D., was sitting in his art class at Berkeley High School when his art teacher boasted to the
22 class about his latest artwork: an image of barbed wire fences in the shape of a Star of David
23 with a giant fist punching through it. A.D. was shocked by the violent and blatantly anti-Semitic
24 nature of the imagery.

25 30. The next day, the art teacher used his class to promote a walkout “in support of
26 Palestine,” spending time and resources to advertise the demonstration. The walkout that
27 followed was filled with chants that included “Fuck the Jews.”

28 31. When Ms. Pearlman reported her concerns about the teacher’s conduct, the school

1 did not address or correct the teacher’s in-class anti-Semitism. Instead, the school punished Ms.
2 Pearlman’s child: administrators removed A.D. from his classroom, segregated him from his
3 classmates, and banished him to the library and student health center.

4 32. The school’s decision to punish the targets of anti-Semitism rather than the
5 perpetrators made a lasting impression on A.D. He was acutely aware of the hostility towards
6 Jews in his school. When he later participated in an ethnic studies identity project, A.D., who is
7 biracial, chose to make a presentation solely about his non-Jewish roots in Belize because, as he
8 told his mother, “the timing is not right” to share his Jewish identity.

9 33. Like Ilana Pearlman and Melissa Alexander, Dawn and Michael Rosenthal were
10 devastated that their son, B.R., was suffering in the anti-Semitic environment created by his
11 teacher at the Daniel Pearl Magnet High School. The school’s response was to isolate him and
12 place additional burdens on him. When B.R. walked into his honors chemistry teacher’s
13 classroom at the start of the 2025 school year, he immediately noticed a “Free Palestine” poster
14 on the wall. There was also a poster that said, “You can pledge allegiance to any flag you want
15 to,” which featured a Palestinian flag, but not an Israeli or American one. Mr. Rosenthal called
16 the operations coordinator at Los Angeles Unified School District (“LAUSD”) and notified them
17 of the posters. Roughly two weeks later, the operations coordinator said the principal was trying
18 to take down the posters, but the teacher was refusing to remove them. As this was happening,
19 B.R. shared with his parents that the posters and the rhetoric were making him anxious in class
20 and making it difficult for him to focus. A breaking point came on October 7, 2025, the two-year
21 anniversary of the October 7th massacre, when the chemistry teacher wrote on the whiteboard,
22 “Oy vey, it’s free” with an arrow pointing to “FREE PALESTINE.” The anti-Semitic message
23 was clear. The teacher was celebrating the massacre as a moment of liberation and using
24 stereotypical Jewish language (“oy vey,” a Yiddish phrase indicating dismay or exasperation) to
25 make it seem as if Jews were whining and against people being free, further villainizing Jews.
26 The spectacle was denigrating to Jews and utterly inappropriate to draw on school property—let
27 alone by a teacher.

28 34. Prompted by the ugly October 7th imagery from his chemistry teacher, B.R. left

1 the classroom and went to the school counselor. B.R. also sent an email to his parents, letting
2 them know he could no longer endure the chemistry classroom. When Michael and Dawn
3 Rosenthal met with the principal, the school’s proffered “solution” was to put B.R. into a remote
4 online chemistry course that he would have to complete on his own through Ingenuity, a LAUSD
5 online platform typically used for credit recovery, not as a substitute for an honors course. In
6 fact, there were no honors options to match the course in which B.R. had been enrolled. B.R. was
7 also forced to enroll in additional classes to fill the gap in his schedule while still pursuing the
8 online chemistry course, which meant B.R.’s school effectively forced him to take on additional
9 academic burdens to accommodate his chemistry teacher’s anti-Semitism.

10 35. Despite the many complaints that Dawn and Michael Rosenthal raised about this
11 teacher, the school ignored them. This teacher was ultimately removed only after he stapled a
12 student’s arm and was arrested on felony charges.

13 36. The reaction—or rather, the lack thereof—from the administration at Daniel Pearl
14 Magnet High School is even more gutting for the Rosenthals because they transferred B.R. to the
15 school in 2024 to escape anti-Semitism at a different California public school, Sherman Oaks
16 Center for Enriched Studies (“SOCES”). At SOCES, B.R. suffered pervasive and violent anti-
17 Semitic bullying. B.R. was called a “shitcan Jew” and faced taunting “Heil Hitler” salutes.
18 Rather than disciplining the offending students, the school’s response was to force B.R. to sit in a
19 classroom or other segregated space during lunch to keep B.R. safe. It escalated to the point that
20 in November 2022, when B.R. was running around the track during physical education, one of
21 the bullies yelled, “Let’s get the Jew,” and a group tripped B.R. and beat him until he went
22 unconscious. Another student helped B.R. to the nurse, who called Mrs. Rosenthal. When Mrs.
23 Rosenthal heard what happened and told them to call an ambulance, the nurse blanched and
24 refused to do so. Not only did the school not suspend any of the attackers, it continued to put
25 some of the attackers in B.R.’s classes. Daniel Pearl Magnet High School was supposed to be a
26 balm and a new beginning after the horrific and violent anti-Semitic incidents at SOCES but has
27 proven to be another incubator of anti-Semitism.

28 37. Unsurprisingly, when teachers promote anti-Semitic rhetoric in classrooms,

1 attacks from students follow suit. On October 9, 2023, the first day back at school after the
2 October 7, 2023 massacre, Coalition Member #1’s daughter, Student A, a twelve-year-old Jewish
3 student at University Preparatory Academy (“UPA”), a charter school that is part of the school
4 system in Santa Clara County, was struggling with grief over the attacks in Israel where she has
5 close family and friends. On the verge of tears, she asked her world history teacher if she could
6 go to the bathroom and take a few moments to compose herself. Shockingly, her teacher used
7 this as an opportunity to single out and make a political point at the expense of a visibly
8 distraught Student A, who was also the one Jewish student in the class and the only openly
9 Jewish student at UPA; he would not let Student A leave the room until she read aloud to the
10 class an account about how in the past, Palestinians and Jews used to get along. The class was
11 not studying the Israeli-Palestinian conflict—it was studying Muslim history—so his choice to
12 keep a twelve-year old Jewish girl from leaving his room until she read aloud to the class a
13 passage that he liked about how peacefully Palestinians had previously interacted with Israelis
14 singled her out as a Jew and used her not just as a stand-in for the Jewish state but to minimize
15 the actual hostilities her family was experiencing. Not only did the teacher emphasize Student
16 A’s identity as the “Jew” to her classmates, his forcing her to publicly espouse a position that
17 was at odds with the present-day threat to her family and her personal grief was oppressive and
18 humiliating.

19 38. Student A’s teacher’s attitude was adopted and amplified by her fellow students.
20 The very next day, two classmates who identified as Palestinians screamed at her, “Jews are
21 terrorists!” and “Do you know that your family in Israel is living on stolen land?” Within two
22 days, Student A’s classmates shunned her and stopped speaking to her; within a month, she lost
23 her name and was referred to exclusively and derisively as “Jew.” Two boys chased her around
24 the school when they heard Student A talking in Hebrew to a friend in Israel, screaming, “We
25 want you to die.” Coalition Member #1 and her husband met repeatedly with various school
26 administrators, stressing Student A felt physically unsafe, but nothing was done to remedy the
27 problem. The student attacks simply got worse, and two girls threatened Student A that “snitches
28 get stiches” and that they will “jump” and “beat the shit out of” the person that reported their

1 attacks on her. Previously a happy, well-adjusted child, Student A was isolated and shunned. To
2 her schoolmates, Student A was no longer a person. She was the “Jew” and the target of their
3 anger and hatred for all Jews and Israelis. It was a toxic, anti-Semitic environment at UPA, with
4 one of the few other Jewish families begging Coalition Member #1 to instruct Student A not to
5 reveal their child was also Jewish. That fear was, unfortunately, well-founded—after all, Student
6 A faced threats of violence from students, and the school sat idly by.

7 39. Coalition Member #1 asked the school for help, but none was forthcoming. The
8 situation became intolerable and, in order to protect her daughter, she withdrew her from the
9 school. Coalition Member #1 also filed a formal complaint to the county through the UCP, but
10 there was no redress. After waiting for nearly four months for a response, Coalition Member #1
11 was told that the county has no responsibility for investigating or resolving any complaints about
12 the school and that the UCP complaint should have been submitted to the school that had failed
13 her already, or to the CDE which Coalition Member #1 did, whereupon the CDE itself sent the
14 complaint back to the school. Nobody ever responded to Coalition Member #1, much less took
15 responsibility—not UPA, not the county, and not the CDE.

16 40. Currently, Student A attends a private Catholic high school because she feels
17 safer there as a Jew than she does in a California public school.

18 41. Coalition Member #2, who is Jewish and Israeli American, moved her two
19 primary school-aged children to Kester Elementary School in Los Angeles Unified School
20 District to avoid the anti-Semitism they had experienced in their previous school. But here, too,
21 they encountered anti-Semitism. In 2024, Coalition Member #2’s daughter, Student B, then in
22 third grade, was subjected to hostility when she participated in a school talent show. She planned
23 to sing a song by an Israeli Eurovision contestant and prepared a poster with pictures, one of
24 which included the Israeli flag, to accompany her performance. Before she performed, a teaching
25 assistant told the nine-year-old child that “Israel is a racist apartheid state, and by supporting
26 Israel, you are being racist.” The assistant told her she could not get on stage with her poster.

27 42. The next year, Student B was the only child not accepted for the school talent
28 show. It was not until Coalition Member #2 escalated the issue to the principal and alleged the

1 school was being anti-Semitic that Student B was begrudgingly permitted to participate.

2 43. Kester Elementary School’s discriminatory and hostile behavior towards Student
3 B was consistent with the school’s biased, villainizing lessons about Israel. For example, in May
4 2025, the school created passport stamps for children attending a multicultural fair. The stamp
5 for Palestine included a map of all of Israel. The one for Israel showed the state of Israel with the
6 West Bank and Gaza removed. At this event, a Palestinian song glorifying martyrdom was
7 played despite objections from Jewish and Israeli parents. For the event, students could create a
8 paper doll that reflected their identity. To reflect her Jewish ancestral identity, Student B made a
9 doll with an Israeli flag on it, but someone ripped the flag off the doll.

10 44. When Student B was in third grade, the school psychologist who was evaluating
11 her for learning disabilities asked her to look at a Palestinian flag, which seemed, at best, curious
12 and unrelated to the evaluation. That same psychologist berated Student B about having dark
13 circles under her eyes, a feature that is part of her Middle Eastern heritage and made Student B
14 feel extremely self-conscious about her appearance. Then, the special education administrator at
15 the school secretly filed a Department of Children and Family Services (“DCFS”) child welfare
16 report accusing Coalition Member #2 and her husband of neglect and depriving their children of
17 sleep. They went through two home visits without issue, and DCFS rejected the complaint.
18 However, the experience left Coalition Member #2’s family shaken, especially her son in first
19 grade, Student C, who was extremely anxious and fearful his parents would be taken away.
20 Coalition Member #2 was told by one of the DCFS social workers during one of the home visits
21 that the Kester Elementary School environment was unsafe for her family, and she should
22 consider homeschooling her children.

23 45. During the 2024-2025 school year when Student B was in fourth grade, students
24 would repeatedly yell “Free Gaza” at her without any consequences or reprimand from teachers
25 or administrators. However, when Student B yelled back, “Free the hostages,” a teacher reported
26 her and had her sent to the principal for breaking the rules against protesting.

27 46. Due to the extreme anti-Semitic hostility and animus towards her children,
28 Coalition Member #2 has moved them to different schools.

1 47. California schools have been deplorably unresponsive to the suffering of Jewish
2 and Israeli students and families.

3 48. When John and Jane Smith’s daughter, J.S., was attending the extended day care
4 program at her Etiwanda middle school, J.S. was choked by another student, which was
5 immediately preceded by that student yelling, “Shut your stupid Jewish ass up.” After the
6 choking attack, when J.S. caught her breath, she reported the incident to the on-site coordinator
7 for Etiwanda’s extended day program, who called John Smith but failed to share that J.S. had
8 been choked by a student or that the same student yelled, “Shut your stupid Jewish ass up.”
9 Instead, the staff member blamed J.S., focusing on what the principal later admitted was a
10 defensive “light kick, not aggressive” after the other student yelled, “Shut your stupid Jewish ass
11 up” and moved towards J.S. in a threatening, menacing manner.

12 49. John and Jane Smith only found out what actually happened when they spoke to
13 their pre-teen child. Slowly, in piecemeal conversations, without ever putting anything in
14 writing, the school verified J.S.’s account, even as they refused to let John and Jane Smith watch
15 the security video footage of the incident. The only option the school presented to John and Jane
16 Smith was to have J.S. relive her trauma by watching and narrating the video of the assault to the
17 school principal, with no support and without her parents present. To this day, the school district
18 has continued to deny John and Jane Smith access to the security footage of the incident or to
19 any report or other written documents relating to the anti-Semitic incidents J.S. has experienced.
20 As far as the Smiths are aware, neither the student who attacked J.S. nor the staff who failed to
21 intervene and misreported the attack were disciplined. Further, the school district initially
22 declined to classify the anti-Semitic assault on J.S. as a bias-related or hate-related incident.

23 50. Jewish students at Berkeley Unified have heard calls in the hallways to “Kill the
24 Jews” and “eliminate Israel.” Jewish students have been asked what their “number is,” a
25 reference to the Nazis’ practice of tattooing prisoner numbers on Jews held in death camps, and
26 Jewish students have been bullied based on their appearance, such as being told, “You have a big
27
28

1 nose because you are a stupid Jew,” and “I don’t like your people.”¹⁰

2 51. The response from faculty and administrators ranges from dismissive to
3 milquetoast to hostile. At a Berkeley Unified school board meeting, when Plaintiff Ilana
4 Pearlman reported anti-Semitic bullying by students who called Jewish children “kikes” and
5 “dirty Jews,” participants mocked her, with one person shouting at her, “Zionist Nazi bitch!” An
6 employee with Berkeley Unified made grotesque farting sounds as Ms. Pearlman tried to speak
7 and subsequently helped a community member dox her. In another California school district,
8 Pajaro Valley, a board member publicly engaged in a disgraceful rant against the Jewish
9 community, calling Jewish parents “segregationists” and accusing them of spreading “insane”
10 lies.¹¹

11 52. And the horrific anti-Semitic incidents have continued throughout 2025. For
12 example, on December 3, 2025, in the middle of the school day, eight students at Branham High
13 School in San Jose formed a swastika with their bodies on the school’s football field. No one
14 from the school intervened to stop the incident. Later that same day, a photo of the human
15 swastika was posted to social media, accompanied by a 1939 quote from Adolf Hitler calling for
16 the annihilation of Jews. The post was shared widely and viewed by students at the school. This
17 brazen public display of a Nazi symbol has shaken and scared Jewish families and students
18 across California. Though the Branham High School principal, Beth Silbergeld, issued a
19 statement condemning the incident, Defendants have taken no meaningful action to address it or
20 to correct the school environment that allowed it to occur. As Principal Silbergeld said,
21 “[S]chools cannot do this work alone.”¹²

23
24 ¹⁰ Brandeis Center and the Anti-Defamation League, Complaint to U.S. Dep’t of Educ. Office of
25 C.R., at 19-20 (Feb. 28, 2024), [https://brandeiscenter.com/wp-
content/uploads/2024/02/Brandeis-Center-ADL-Complaint.pdf](https://brandeiscenter.com/wp-content/uploads/2024/02/Brandeis-Center-ADL-Complaint.pdf) [hereinafter *Berkeley OCR
Complaint*].

26 ¹¹ Video posted by @navivalues, Instagram (Apr. 18,
27 2025), <https://www.instagram.com/reel/DImpPalOvs1/>.

28 ¹² Video posted by JCRC of San Francisco, Facebook (Dec. 24, 2025)
[https://www.facebook.com/sfjrcr/videos/principal-of-branham-hs-speaks-on-antisemitic-
incidentmp4/1197493791871914/](https://www.facebook.com/sfjrcr/videos/principal-of-branham-hs-speaks-on-antisemitic-incidentmp4/1197493791871914/).

1 **B. Many Teachers Promote Anti-Semitic Lessons that Encourage**
2 **Ostracization of and Discrimination Against Jewish and Israeli**
3 **Students.**

4 53. Horribly, teachers and administrators not only fail Jewish and Israeli students
5 in their apathy toward and tacit endorsement of anti-Semitism, but far too often are the bullies
6 and bigots ostracizing and discriminating against them.

7 54. Defendants have allowed California schools to use required classroom time to
8 teach anti-Semitic propaganda and hate instead of the State’s required course content and
9 frameworks. Some teachers have abandoned approved curricula and are replacing them with
10 anti-Semitic materials of their own choosing. Others have encouraged students to spend required
11 classroom time attending administration-approved walkouts rife with anti-Semitic chants led by
12 their own teachers—or by third-party contractors exploiting schoolchildren to bolster the ranks
13 of their demonstrations. Turning California public schools into vehicles for anti-Semitic
14 propaganda instead of teaching required course material violates the rights of not only Jewish
15 and Israeli students, but *all* students by depriving *all* affected students of their fundamental right
16 to an education.

17 55. Anti-Semitism is one of the world’s oldest and most enduring forms of hatred. It
18 has persisted through the millennia, retaining common tropes while mutating according to the
19 majority’s prevailing ideologies. Just as anti-Semitism in the past often casts Jews as uniquely
20 responsible for societal ills, such as plagues, or engaged in outlandish acts of cruelty, today’s
21 version disguises that same anti-Semitism through veiled references to Israel or “Zionists.”

22 56. It has become common in many settings, including educational settings, to use the
23 term “Zionist” as a code word for “Jew” and Israel as a proxy for Jews collectively, particularly
24 when “Zionist” is used as a slur; *e.g.*, when the State of Israel and its supporters are demonized
25 as “Zionist” monsters, accused of killing children, stealing land, and perpetrating racism.¹³

26 ¹³ *See, e.g.*, KENNETH L. MARCUS, THE DEFINITION OF ANTI-SEMITISM, 175 (Oxford University
27 Press 2015). Sadly, this is nothing new: propagandists have for decades used the term “Zionist”
28 or “zio” as code for “Jew.” *See id.* What is new—and troubling—is that this bigoted discourse
29 has become commonplace and serves to mask anti-Semitism. *See, e.g.*, Anti-Defamation League,
30 *Anti-Zionist Language Left and Right Vilifies Jews* (Apr. 4, 2023),
31 [https://www.adl.org/resources/article/anti-zionism-antisemitism-how-anti-zionist-language-left-
32 and-right-vilifies-jews](https://www.adl.org/resources/article/anti-zionism-antisemitism-how-anti-zionist-language-left-and-right-vilifies-jews).

1 57. Today’s most prominent form of anti-Semitism operates by denying any
2 historical or religious connection between Jews and the land of Israel and by characterizing
3 Israel, its Jewish citizens, and the Jewish people everywhere as the embodiment of evil.

4 58. Specifically, many of today’s anti-Semites deny Jewish people’s shared
5 indigenous connection to Israel, despite both the historical continual presence of Jews in Israel
6 for millennia and the fact that connection to Israel is a fundamental tenet of faith for the vast
7 majority of Jewish people. Jewish religious practice emphasizes Jews’ ancestral, present, and
8 future connection to the land of Israel. For example, the three-times daily *Amidah* prayer—the
9 text of which is well over a thousand years old—petitions for the return of all Jews to Israel.¹⁴
10 Traditional Jewish law (*halacha*) establishes numerous commandments related to the land of
11 Israel, including prohibitions on defaming or speaking ill of the land of Israel,¹⁵ forbidding Jews
12 residing in the land from emigrating permanently in the absence of extraordinary
13 circumstances,¹⁶ and a variety of positive commandments that can *only* be fulfilled in the land of
14 Israel.¹⁷ Jewish religious customs also emphasize the religious connection to the land of Israel.
15 Familiar examples of such rituals include a bridegroom crushing a glass at the end of the
16 wedding ceremony to symbolize and recall the destruction of the Temple in Jerusalem by the
17 Roman Empire in 70 CE. Connection with the land of Israel is thus a matter of positive religious
18 obligation for many Jews.

19 59. Indeed, for many Jews, including Plaintiffs Melissa Alexander, Ilana Pearlman,
20

21 ¹⁴ See, e.g., *Siddur Edot HaMizrach, Weekday Mincha, Amida*, Sefaria (last visited Feb. 17,
22 2026),
23 [https://www.sefaria.org/Siddur_Edot_HaMizrach%2C_Weekday_Mincha%2C_Amida.22?lang=](https://www.sefaria.org/Siddur_Edot_HaMizrach%2C_Weekday_Mincha%2C_Amida.22?lang=bi)
[bi](https://www.sefaria.org/Siddur_Edot_HaMizrach%2C_Weekday_Mincha%2C_Amida.22?lang=bi).

24 ¹⁵ See, e.g., *Avot deRabbi Natan 9:2*, Sefaria (last visited Feb. 17, 2026),
https://www.sefaria.org/Avot_DeRabbi_Natan.9.2?lang=bi.

25 ¹⁶ See, e.g., Rabbi Moses Maimonides, *Mishneh Torah, Hilchot Melakhim*, Sefaria, 5:12 (last
26 visited Feb. 17, 2026),
https://www.sefaria.org/Mishneh_Torah%2C_Kings_and_Wars.5?lang=bi.

27 ¹⁷ See, e.g., Rabbi Moses Maimonides, *Mishneh Torah, Hilchot Shemittah*, Sefaria, 4:25 (last
28 visited Feb. 17, 2026) (explaining that the laws pertaining to agriculture during the Sabbatical
year are observed only in the land of Israel),
https://www.sefaria.org/Mishneh_Torah%2C_Sabbatical_Year_and_the_Jubilee.4.25?lang=bi.

1 and Dawn and Michael Rosenthal and their children, Ivy Chesser and Y.Z., and members of the
2 Coalition, the belief in the land of Israel as the indigenous Jewish homeland is central not only to
3 their Jewish ancestral identity but also to their and their families' sincerely-held religious beliefs.
4 For them, supporting Israel as the Jewish homeland is a sincerely held religious commitment.
5 Some go to Israel, not only to see family, but to pray and connect with the land that is essential to
6 the Jewish people. Disavowing Israel's right to exist or disavowing Jewish ties to Israel violates
7 their religious beliefs. Accordingly, when their children have been made to feel it is unsafe or
8 unacceptable in their classrooms and schools to share their belief in Jewish ties to the land of
9 Israel, it interferes with and undermines their religious beliefs.

10 60. And unsurprisingly, it has had direct and concrete impacts on their children's
11 religious expression. Melissa Alexander's son used to wear a Jewish star necklace nearly every
12 day to school to show his solidarity with the Jewish people. However, after his teacher's anti-
13 Semitic conduct and repeated targeting of him for unjustified discipline and punishment, Ms.
14 Alexander's son is too fearful and refuses to wear his Jewish star necklace. In fact, he will not
15 even wear his Jewish summer camp t-shirts to school for fear of being targeted by his former
16 teacher. Even worse, this experience has made Ms. Alexander's son reluctant to talk about
17 Judaism, his Jewish camp experience, Shabbat dinners, or anything else related to his Jewish
18 practice and expression.

19 61. For Dawn and Michael Rosenthal's son, his chemistry teacher's anti-Israel and
20 anti-Semitic messaging in the classroom had a chilling effect on his ability to express basic
21 aspects of his Jewish identity that related to Israel. He feared that speaking openly about these
22 parts of his sincerely-held beliefs as a Jew could lead to negative attention or repercussions from
23 his teacher, so he forced himself to stay quiet. And for Ilana Pearlman, as mentioned earlier, her
24 son has chosen to downplay or altogether hide his Jewishness because his high school's blanket
25 hostility towards Israel has manifested into blanket hostility towards Jews.

26 62. Both the United States and California witnessed a surge in anti-Semitism
27 following the October 7, 2023 attack on Israeli civilians, the deadliest day for Jews since the
28 Holocaust. Horrifyingly, K-12 educators throughout the country celebrated the bloodshed and

1 denounced Israel as the news broke, well before Israeli forces set foot in Gaza.

2 63. More than two years after October 7, 2023, anti-Semitism in the U.S. remains
3 pervasive and often erupts in violence. The Anti-Defamation League (“ADL”) reported a 360%
4 increase in anti-Semitic incidents in the United States in the 15 months after the attack, with
5 3,283 incidents recorded from October 7, 2023, to January 7, 2024, a dramatic rise compared to
6 the same period in the previous year.¹⁸ The California Justice Department’s 2023 Report on Hate
7 Crime in California found a 53% increase in hate crimes targeting Jews in 2023, despite a drop in
8 hate crimes overall.¹⁹

9 64. Going hand in hand with this anti-Semitism surge is the fact that California
10 teachers have sought to introduce a narrative to children younger than kindergarten that Jews and
11 Israelis, including Jewish and Israeli children, are “oppressors” and that the Jewish State of Israel
12 is a “settler-colonial” and “apartheid” regime that has no right to exist. Indeed, in some
13 classrooms, Israel does not exist. Even before October 7, 2023, Student A, along with her father
14 (Coalition Member #1’s husband), saw that Student A’s seventh-grade classroom in Santa Clara
15 County was decorated with maps of purportedly present-day Middle East that took Israel off the
16 map.

17 65. Some California teachers have developed courses of study that include anti-
18 Semitic propaganda, which they openly teach without district approval—and yet, they go
19 undisciplined by the district. One such unapproved course of study was created by members of
20 the Oakland Education Association (“OEA”), the Oakland teachers union, for children in
21 California K-12 schools. This curriculum recycles anti-Semitic propaganda from totalitarian
22 regimes and age-old anti-Semitic tropes with the intention of indoctrinating, rather than
23 informing, the youngest and most impressionable California students.²⁰

24 ¹⁸ Nicole Chavez, *ADL Records More Than 3,200 Antisemitic Incidents Since Start of Israel-*
25 *Hamas War*, CNN (Jan. 11, 2024), [https://www.cnn.com/2024/01/10/us/adl-antisemitism-](https://www.cnn.com/2024/01/10/us/adl-antisemitism-reports-soar-reaj/index.html)
26 [reports-soar-reaj/index.html](https://www.cnn.com/2024/01/10/us/adl-antisemitism-reports-soar-reaj/index.html).

27 ¹⁹ See Sue Fishkoff, *Report: Anti-Jewish hate crimes in California rose at ‘alarming’ rate last*
28 *year*, JWeekly (July 3, 2024), [https://jweekly.com/2024/07/03/report-anti-jewish-hate-crimes-in-](https://jweekly.com/2024/07/03/report-anti-jewish-hate-crimes-in-california-rose-at-alarming-rate-last-year/)
[california-rose-at-alarming-rate-last-year/](https://jweekly.com/2024/07/03/report-anti-jewish-hate-crimes-in-california-rose-at-alarming-rate-last-year/).

²⁰ *Oakland Teach-In Curricular Resources* (last visited Feb. 19, 2026), <https://perma.cc/AP9A->

1 66. As just one example, the curriculum intended for transitional kindergarten (“TK”) through third grade students includes links to a read-aloud of the book *P is for Palestine*, which states “I is for Intifada,” and defines “Intifada” as “rising up for what is right, if you are a kid or a grown-up.”²¹ Figure 1, below, is a screenshot from the book as featured in the read-aloud in the OEA curriculum.

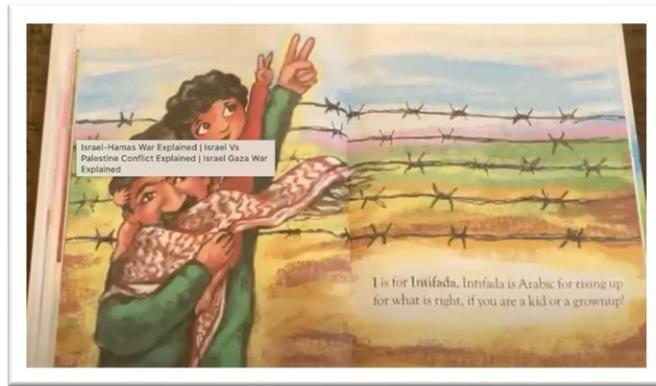


Figure 1

13 67. Omitted from this narrative is that “intifada” has traditionally been used to describe violent conflict—conflict that, in most recent years, has targeted Jewish civilians and celebrated their murders. During the “Second Intifada,” also called the “Al-Aqsa Intifada,” U.S.-designated foreign terrorist organizations such as Hamas, Palestinian Islamic Jihad, the Popular Front for the Liberation of Palestine, and the al-Aqsa Martyrs Brigade perpetrated numerous suicide bombings of cafes, buses, and other civilian “targets,” killing more than a thousand Israeli citizens (and a number of U.S. citizens). Whether intended to present the anti-Semitic message that “rising up for what is right” includes slaughtering Jewish and Israeli children in pizza shops or elderly Jews and Israelis on buses, or the anti-Semitic message that coexistence among Jewish Israelis, Arab Israelis, and Palestinians is not “right,” presenting “intifada” in this way to Oakland’s children—without any Israeli perspective and with the image above—is intended to indoctrinate, not teach, and leaves young Jewish and Israeli students feeling vulnerable and marginalized in their classrooms.

[WX6R](#) [hereinafter *Oakland Teach-In Curriculum*].

²¹ *Id.*; *P is for Palestine: A Children’s Alphabet Book Read Along*, YouTube (last visited Feb. 19, 2026), <https://www.youtube.com/watch?v=6ZKCT6LfCgQ>.

1 68. Oakland teachers participated in an unauthorized teach-in in December 2023²²
2 and OEA organizers instructed them to provide young pupils with worksheets, *see* Fig. 2, that
3 asked them to draw “the Zionist leaders of Israel receiv[ing] money and support to conduct” a
4 “two-tiered (unfair) system where Palestinians are mistreated and attacked.”²³

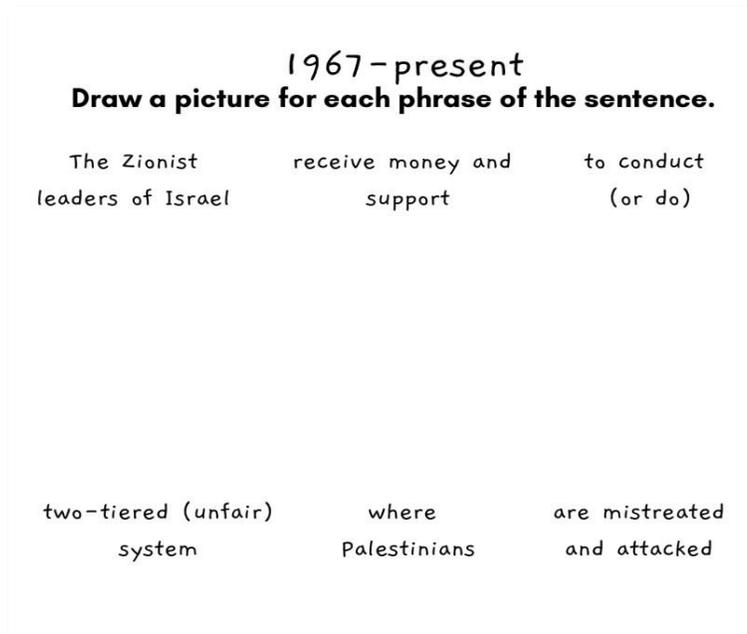


Figure 2

17 69. It should be obvious that this, too, is anti-Semitic propaganda, lacking intellectual
18 veracity or educational value. Asking children to draw “Zionist leaders of Israel receiving
19 money” is a contemporary repackaging (*i.e.*, using “Zionist” as a replacement for “Jewish”) of
20 the oldest, ugliest anti-Semitic stereotypes of Jews as greedy money-hoarders who use their
21 wealth to commit evil. And another coloring worksheet—for children as young as TK no less—
22 refers to “Zionist bullies” who are “always scaring” and “arresting” Palestinian children.²⁴ This
23 bevy of fact-free material is designed to inculcate anti-Semitism, not to allow elementary school

24 ²² Dana Goldstein, *Oakland Educators Hold Unauthorized Teach-in Supporting Palestinians*,
25 New York Times (Dec. 6, 2023), <https://www.nytimes.com/2023/12/06/us/oakland-california-teachers-palestinians-israel.html>.

26 ²³ Ashley McBride, *What did Oakland Teachers Talk About During the Palestine Teach-In?*, The
27 Oaklandside (Dec. 7, 2023), <https://oaklandside.org/2023/12/07/oakland-teachers-palestine-teach-in/>; *Palestine Day 1 Worksheet* (last visited Feb. 19, 2026), <https://perma.cc/Z68W-59FD>.

28 ²⁴ *Id.*; *Handala’s Return: A Children’s Story and Workbook* (last visited Feb. 20, 2026),
<https://perma.cc/QQ24-TNQ9>.

1 children to learn factual information about the Israeli-Palestinian conflict.

2 70. As another horrifying example, the following image, Figure 3, below, appears in a
3 lesson in the OEA curriculum materials for children as young as third grade:²⁵



14 Figure 3

15 71. The image above is anti-Semitic in numerous ways. For one, it mischaracterizes
16 Zionism as the belief in a country “only for Jewish people.” This is false. Zionism is not defined
17 by the exclusion of non-Jews. Indeed, the Israeli Declaration of Independence provides that the
18 State of Israel “will ensure complete equality of social and political rights to all its inhabitants
19 irrespective of religion, race or sex; it will guarantee freedom of religion, conscience, language,
20 education and culture; it will safeguard the Holy Places of all religions; and it will be faithful to
21 the principles of the Charter of the United Nations.” 21% of Israeli citizens identify as Muslim,
22 7% as Christians, and 1.5% as Druze.²⁶

23 72. Next, the image bizarrely blames European colonialism on Jews, suggesting that
24 the British control over Palestine after World War I and the collapse of the Ottoman Empire was
25

26
27 ²⁵ *Oakland Teach-In Curriculum; PALESTINE Day 1 of 2*, at 15 (last visited Feb. 20, 2026),
<https://www.canva.com/design/DAF1hEOXg5w/jLuie7S1vCkaSuM7KmVoJQ/view>.

28 ²⁶ *Vital Statistics: Latest Population Statistics for Israel*, Jewish Virtual Library (last updated
Jan. 2026), <https://www.jewishvirtuallibrary.org/latest-population-statistics-for-israel>.

1 done at the behest of Jews and the British only “agreed” to “help” Jews “colonize Palestine.” To
2 make sure students get the point that Jews have dubious allies, it says that the British empire is
3 the “same one who colonized the Americas”—misrepresenting the colonial history of California
4 (and much of the rest of the Americas). The image paints a decidedly anti-Semitic one-sided
5 picture of Israel and the Jews who feel an affiliation to the land, while also portraying Jews as
6 able to manipulate one of the largest empires in history to their own end, creating an
7 environment of hostility and demonization towards Jews and, specifically, Jewish students.
8 Defendants have implicitly condoned the use of these materials, rife with traditional anti-Semitic
9 tropes and stereotypes, by failing to curtail their use.

10 73. The promotion of unauthorized anti-Semitic materials in California schools has,
11 unfortunately, been widely known for years—and yet Defendants have taken no effective action.
12 For example, it was widely reported in California and nationally that Oakland teachers utilized
13 the above-described materials as part of an unauthorized December 2023 teach-in.²⁷ Despite the
14 district making it clear that they opposed the teach-in and that it was unauthorized, Oakland
15 teachers proudly touted this anti-Semitic propaganda.²⁸ Indeed, the OEA organizers of the
16 Palestine curriculum stated that they “reject the majority of the lessons shared by” their district
17 on the Israeli-Palestinian conflict.²⁹ The organizers disregarded the district and went rogue to
18 promote their own anti-Semitic lessons to California children in California classrooms: Oakland
19 teachers boasted with pride that they proceeded with the teach-in *despite* this warning.³⁰ It is
20

21 ²⁷ Ashley McBride, *What did Oakland Teachers Talk About During the Palestine Teach-In?*, The
22 *Oaklandside* (Dec. 7, 2023), <https://oaklandside.org/2023/12/07/oakland-teachers-palestine-teach-in/>.

23 ²⁸ Dana Goldstein, *Oakland Educators Hold Unauthorized Teach-in Supporting Palestinians*,
24 *New York Times* (Dec. 6, 2023), <https://www.nytimes.com/2023/12/06/us/oakland-california-teachers-palestinians-israel.html>.

25 ²⁹ Kristina Watrobski, *California teachers lead unauthorized pro-Palestine teach-in amid*
26 *districtwide tension*, *KMPH* (Dec. 7, 2023), <https://kmp.com/news/local/california-teachers-lead-unauthorized-pro-palestine-teach-in-amid-district-wide-tension-oakland-unified-school-district-education-association-israel-hamas-palestine-crisis-in-the-classroom>.

27 ³⁰ *What We Learned From Our “Oakland to Gaza” K-12 Teach-In*, *Rethinking Schools* (last
28 visited Feb. 17, 2026), <https://rethinkingschools.org/articles/what-we-learned-from-our-oakland-to-gaza-k-12-teach-in/>.

1 little surprise that after Oakland teachers taught this skewed, demonizing narrative of Israel, the
2 one Jewish state, the U.S. Department of Education’s Office for Civil Rights received a
3 complaint that the teachers who taught these materials “taught students that a ‘free Palestine
4 means the annihilation of Jews.’”³¹ Notwithstanding the widespread attention, Plaintiffs have no
5 indication that the Oakland Unified School District employees who led and participated in this
6 promotion of anti-Semitism were ever disciplined, let alone that any other corrective action was
7 taken to remediate the impact on students. Indeed, the available information shows that, despite
8 the district’s clear statement that the teach-in was unauthorized, the teachers’ flouting of the
9 district’s warning, and a UCP complaint being filed regarding the teach-in, the district declined
10 to discipline anyone.³²

11 74. These lessons that demonize Zionism and Israel have concrete, real-world impacts
12 on students who learn to hate not just Israel, but Jews. A transcript of a video made by an
13 Oakland Unified school teacher shows his fifth graders reciting what they had learned, with one
14 student looking into the camera and saying, “Another major thing that I’ve learned is that the
15 *Jews*, the people who took over, basically just stole the Palestinians’ land And one thing
16 that’s really surprising to me, and that appeals to me is that the U.S. is helping the Jews. And I
17 really don’t like that because we’re basically helping the bad guys colonize people from their
18 land.”

19 75. Oakland Unified is far from the only California school district in which teachers
20 have decided to incorporate anti-Semitic propaganda into their curricula. In December 2023, a
21 Los Angeles Unified School District teacher facilitated a teach-in called “Stop the War Now!
22 Teach In: Israel-Palestine!” More than 1,000 parents, teachers, and concerned members of the
23 community signed a petition asking that the teach-in be prevented from going forward because
24

25 ³¹ Antonette Bowman, *California Teachers Caught Sharing Pro-Hamas Propaganda*,
26 Foundation for Defense of Democracies (last visited Feb. 17, 2026),
27 [https://www.fdd.org/analysis/2024/02/16/california-teachers-caught-sharing-pro-hamas-
propaganda/](https://www.fdd.org/analysis/2024/02/16/california-teachers-caught-sharing-pro-hamas-propaganda/).

28 ³² Niva Ashkenazi, *Oakland schools decline to discipline staff over 2023 pro-Palestinian teach-
in*, JWeekly (May 20, 2025), [https://jweekly.com/2025/05/20/oakland-schools-decline-to-
discipline-staff-over-2023-pro-palestinian-teach-in/](https://jweekly.com/2025/05/20/oakland-schools-decline-to-discipline-staff-over-2023-pro-palestinian-teach-in/).

1 the community knew the teacher overseeing it had a history of biased anti-Israel activism, and
2 they feared for the safety and wellbeing of Jewish and Israeli students, staff, and families. The
3 school approved it, however, and Los Angeles Unified School District’s leadership stated that
4 the principal of the school and other leadership had reviewed the materials in advance. After
5 seeing the slides from the teach-in after the event occurred, the Los Angeles Unified School
6 District’s Office of the Superintendent acknowledged that it was not, in fact, “objective, as had
7 been represented.” Instead, the slides provided a highly biased picture that purported to
8 delegitimize the very existence of the Jewish State of Israel and included recycled anti-Semitic
9 tropes, including disproportionately emphasizing money and financial ties related to “Zionists.”
10 The slides claimed Israel was created when “Zionist gangs carr[ied] out [a] project of
11 displacement, ethnic cleansing;” stated Zionists “[f]undraised \$\$\$ around the world to BUY a
12 Jewish homeland;” referred to the UN recognition of the state of Israel as “Palestine Loss of
13 Land;” and purported to justify the terrorism of the First and Second Intifada and Hamas’s
14 massacre on October 7, 2023. The slides also treated as fact a number of allegations against
15 Israel that repackage anti-Semitic conspiracy theories about Jewish power, including that Israel
16 has “supplied, armed, trained and advised Right Wing governments and dictatorships” in Latin
17 America, trained the LAPD, NYPD, and other U.S. police forces, and “Zionist politicians are
18 censoring our education because it reveals the deeply oppressive agenda that is detrimental to
19 us!” Common to all of these egregiously false, biased, and discriminatory lessons is the denial of
20 Jewish indigenous and historical connections to the land of Israel, a means by which
21 contemporary anti-Semitism seeks to erase the history of the Jewish people, eliminate the Jewish
22 people’s identity, and erroneously cast Jews as foreign interlopers in their own homeland.

23 76. And at Branham High School in Campbell Union, the twelfth grade Ethnic
24 Literature curriculum included lessons that presented a fringe extremist anti-Zionist rabbi to
25 normalize discriminating against Jews who are Zionists and to not only present Israel as an
26 oppressor but also justify the atrocities committed against Israeli civilians on October 7, 2023.
27 The course also included a student presentation that featured a slide on “Genocide of
28 Palestinians” that was rife with biased, false, and debunked information about Israel that the

1 class teacher not only failed to correct but then posted to the teacher’s Ethnic Literature social
2 media account.³³

3 77. It would be one thing if school administrators and districts properly reprimanded
4 and course corrected these unauthorized and unlawful discriminatory teachings. However, there
5 is no evidence that the districts and administrators did anything (aside from toothless training
6 requirements) to address and correct the teachers’ behavior and remediate the harm to students,
7 including but not limited to Jewish and Israeli students in the district, let alone taking effective
8 action. It is not even clear whether the teachers who plainly violated the State’s Education Code
9 received even a warning or an instruction to alter their behavior, let alone the corrective action
10 and anti-discrimination education that is warranted when teachers expose their classes to such
11 biased, false, and hate-inciting content. And it is no secret that the districts have been apathetic,
12 at best, in responding to these unlawful, discriminatory teachings. Yet, the Defendants, despite
13 the fact that they were aware, or at least should have been aware based on public reports, have
14 not responded to ensure proper enforcement of applicable California statutory and constitutional
15 law.

16 **C. Defendants Segregate Jewish Children from Their Peers.**

17 78. Some school officials are intentionally and unlawfully segregating Jewish
18 students, depriving them of their constitutionally-protected educational opportunities. On
19 information and belief, schools and districts may fear political blowback (*e.g.*, from unions) if
20 they discipline offending teachers, so they are unlawfully segregating Jewish children facing a
21 hostile environment. These districts are creating spaces where Jewish students are unwelcome
22 and have been removed, thus enabling anti-Semitic hate to be taught in a Jew-free environment,
23 with no one left to object. The districts’ creation of Jew-free classrooms through segregation
24 based on shared ancestry and/or religion is not only unlawful and unacceptable, it also leaves
25 non-Jewish children to be indoctrinated in Jew-hatred.

26 79. Some Plaintiffs and Coalition members have personally experienced segregation

27 ³³ Emma Goss, *State probe: Two San Jose teachers’ lessons ‘discriminated’ against Jews*,
28 JWeekly (Apr. 8, 2025) <https://jweekly.com/2025/04/08/state-probe-two-san-jose-teachers-lessons-discriminated-against-jews/>.

1 based on their Jewish religion and ethnic affiliation. As alleged above, Plaintiffs Dawn and
2 Michael Rosenthal’s son, B.R., was forced by the Daniel Pearl Magnet High School in Los
3 Angeles to withdraw from his honors chemistry class that was taught by a teacher who used
4 classroom time and resources to mock and celebrate the October 7th massacre. Instead, he had to
5 take a lower-level chemistry course by himself in a remote setting outside of school hours. After
6 Plaintiff Melissa Alexander sought help from the administrators at the Louis B. Armstrong
7 Middle School in Los Angeles where her son, B.A., was being falsely accused and subject to
8 unwarranted disciplinary measures for wearing Jewish and Israeli paraphernalia, the school’s
9 chosen response was to remove her son from the class while letting the teacher who engaged in
10 the discriminatory conduct in the classroom go without discipline.

11 80. Additionally, Plaintiff Ilana Pearlman’s son, A.D., was removed from his art class
12 and required to sit alone in the library when Ms. Pearlman complained to the principal about the
13 offensive and anti-Semitic poster in her child’s art classroom, which was in no way tied to the art
14 lessons being taught. Instead of removing the offensive content from the classroom, Berkeley
15 Unified removed the child.

16 81. When John and Jane Smith’s daughter, J.S., was subjected to verbal anti-Semitic
17 attacks at school, including a Hitler “joke,” John and Jane Smith contacted J.S.’s teacher about
18 these incidents. The remedy offered by the teacher was to move only J.S.’s seat, with no
19 consequences for the other students who engaged in the anti-Semitic targeting. After J.S. was
20 singled out to move seats, J.S.’s peers increased their attention toward her and questioned her
21 about what she had done wrong.

22 82. As a result of pervasive anti-Semitism and the segregation of students who
23 complain, many Jewish families, including Plaintiffs Ilana Pearlman and some Coalition
24 members, have removed their children from California’s public schools, and countless others,
25 including Plaintiff Melissa Alexander, are looking to transfer their children. A 2024 report in the
26 *San Francisco Chronicle* suggests that close to 1,000 students in Oakland alone transferred to
27 other school districts.³⁴ According to district officials, this high transfer rate was “likely boosted

28 ³⁴ Jill Tucker, *The number of families fleeing Oakland schools is spiking. Here’s what’s going*

1 by Jewish families leaving the district, citing anti-Israel sentiments among teachers and staff that
2 made them feel uncomfortable or unsafe.”³⁵

3 **II. ALTHOUGH DEFENDANTS ARE AWARE OF THE ANTI-SEMITISM IN**
4 **CALIFORNIA’S PUBLIC SCHOOLS, THEY HAVE FAILED TO ACT**
5 **PROMPTLY TO END IT.**

6 83. Defendants have systematically ignored the claims made by Jewish and Israeli
7 parents, ignored the actions that parents are forced to take on their own to bring attention to the
8 discrimination their children face, ignored the biased and discriminatory classroom materials
9 they vowed to eliminate, ignored the widely circulated media reports about anti-Semitism, failed
10 to monitor UCP administrative proceedings and appeals therefrom, and failed to investigate or
11 intervene in matters that would protect the rights of Jewish and Israeli children throughout the
12 State.

13 84. The Brandeis Center and StandWithUs (the “Nonprofits”) and their counsel have
14 been receiving reports of anti-Semitism from parents and teachers across California since 2020
15 and even earlier. Following October 7, 2023, the Nonprofits were inundated with daily reports of
16 anti-Semitism in California’s K-12 schools. In February 2024, with the help of the ADL and law
17 firms, the Nonprofits established a help line for parents and teachers to report anti-Semitic
18 incidents and obtain legal advice and support.

19 85. In a December 9, 2024 letter, the Brandeis Center, StandWithUs, and the ADL
20 shared a summary of these anti-Semitic incidents with Defendants, including numerous incidents
21 of bullying, harassment, and anti-Semitic curricula in California’s public schools, many of which
22 are set forth herein.

23 86. Defendants had already received clear messages about anti-Semitic bullying,
24 harassment, and curricula from other groups. On October 13, 2023, for example, the American
25 Jewish Committee (“AJC”) wrote an open letter calling on Defendant Superintendent Thurmond

26
27 _____
28 *on*, San Francisco Chronicle (Jan. 17, 2024), <https://www.sfchronicle.com/bayarea/article/ousd-oakland-schools-students-18610733.php>.

³⁵ *Id.*

1 to “Keep Antisemitic Pro-Hamas Materials Out of Ethnic Studies Curriculum.”³⁶ The letter cited
2 the Coalition for Liberated Ethnic Studies’ disturbing social media messages celebrating the
3 October 7th massacre and inciting violence against the Jewish people and urged that “public
4 funds . . . not be directed to an organization or its affiliates who openly promote violence and
5 terrorism.”³⁷

6 87. On January 3, 2024, the California Legislative Jewish Caucus wrote to members
7 of the State Legislature, copying Governor Gavin Newsom, Defendant Superintendent
8 Thurmond, and Attorney General Robert Bonta, among others, to inform the State that “children
9 in some of our K-12 public schools have been subject to intense anti-Israel and antisemitic
10 indoctrination in the wake of the October 7 massacre” and urging them to address the “tragic
11 impacts of broad ignorance among young people about the Holocaust, including many who do
12 not believe the Holocaust happened.”³⁸ On information and belief, no action was taken by any of
13 the Defendants to investigate the claims of anti-Semitism in California schools by the Nonprofits
14 or the California Legislative Jewish Caucus.

15 88. The Attorney General’s Office, which had, in November 2023, sent a very
16 generally-worded letter to school districts reminding them, *inter alia*, of their “responsibility to
17 protect all students from threats and harassment, and to prevent discrimination due to a hostile
18 learning environment,”³⁹ sent another letter on January 9, 2024, focused on curricula.⁴⁰ This

19
20 ³⁶ American Jewish Committee, *American Jewish Committee calls on California to keep*
21 *antisemitic Pro-Hamas materials out of ethnic studies curriculum* (Oct. 13, 2023),
22 <https://www.ajc.org/news/american-jewish-committee-calls-on-california-to-keep-antisemitic-pro-hamas-materials-out-of>.

23 ³⁷ *Id.*

24 ³⁸ California Legislative Jewish Caucus, *Jewish Caucus Sends Letter to Colleagues Re: October*
25 *7 Attack, Rising Antisemitism, and the 2024 Legislative Year* (Jan. 3, 2024),
26 <https://jewishcaucus.legislature.ca.gov/news/jewish-caucus-sends-letter-colleagues-re-october-7-attack-rising-antisemitism-and-2024>.

27 ³⁹ California Department of Justice, *Guidance regarding students’ free speech rights and*
28 *schools’ obligation to prevent discrimination and harassment* (Nov. 9, 2023),
29 <https://oag.ca.gov/system/files/media/legal-alert-oag-2023-03.pdf>.

30 ⁴⁰ California Department of Justice, *Guidance to School Officials re: Legal Requirements for*
31 *Providing Inclusive Curricula and Books* (Jan. 9, 2024),
32 <https://oag.ca.gov/system/files/media/legal-alert-oag-2024-01.pdf>.

1 time, the Attorney General’s Office named the “unfortunate recent rise in antisemitism and
2 Islamophobia” as its reason for reminding school districts of the state’s nondiscrimination laws,
3 and asking them to take “care . . . not to blame any racial, ethnic, or religious group for the
4 actions of a government” when teaching ethnic studies and to “strive to present factual and
5 unbiased information whether discussing communities or countries.”⁴¹

6 89. With full knowledge that anti-Semitic indoctrination is taking the place of
7 required education, Defendants are allowing it and enabling a hostile environment to persist
8 against Jewish children in California public schools through biased curricula and instruction.

9 90. Defendants are aware or should be aware that many schools continue to work
10 with unethical curriculum vendors⁴² (for both ethnic studies and other courses) who openly vow
11 to bring the biased and anti-Semitic content into the classroom. California schools and districts
12 are introducing and promoting anti-Semitic teaching materials, including in Los Angeles, San
13 Francisco, Oakland, Berkeley, Alameda, Richmond, San Mateo, Menlo Park, Fremont, Santa
14 Clara, Long Beach, San Diego, and Santa Ana. Dozens of California school districts, including
15 five of the ten largest, have contracted with or developed ethnic studies courses based on
16 “liberated” principles.

17 91. Further, the hundreds of UCP complaints that were filed by Jewish parents since
18 October 7, 2023, and that continue to be filed, have also put Defendants on notice of the

19
20 ⁴¹ *Id.* at 3 (citing Cal. Ed. Code §§ 201, 220, 51501, and 60044).

21 ⁴² In 2016, the California Education Code was amended to add Section 51226.7, which mandated
22 that the State Board of Education develop an Ethnic Studies Model Curriculum (“ESMC”). The
23 drafted ESMCs put forth in 2019 and 2020 were tainted with biased content, including anti-
24 Semitic content, to which California citizens strenuously objected, and Governor Newsom
25 ultimately vetoed them. Only after biased and discriminatory content was removed from the
26 2021 version of the ESMC did Governor Newsom give approval. Many of the persons who had
27 worked on the rejected ESMC versions now put their efforts into developing and promoting
28 “liberated” ethnic studies courses, using, *inter alia*, the biased materials that were stricken, *see*
The LESMC Story, LIBERATED ETHNIC STUDIES MODEL CURRICULUM
CONSORTIUM - LESMCC (last visited Feb. 22, 2026)
<https://www.liberatedethnicstudies.org/lesmc-story.html>, in contravention of the California
legislature’s expressly worded intention that these materials not be used and its statutory
direction that course materials “[n]ot reflect or promote, directly or indirectly, any bias, bigotry,
or discrimination against any person or group of persons on the basis of any category protected
by [California Education Code] Section 220,” Cal. Educ. Code § 51225.3(a)(1)(G).

1 metastasizing anti-Semitism problem in California’s classrooms.

2 92. With full knowledge that anti-Semitic indoctrination is taking the place of
3 required education, Defendants are allowing it and enabling a hostile environment to persist
4 against Jewish children in California public schools through biased curricula and instruction.

5 93. And as noted above, AB 715 acknowledges that “[i]t has been well documented
6 that Jewish and Israeli American pupils across California are facing a widespread surge in
7 antisemitic discrimination, and bullying has been so severe and pervasive that it has placed
8 Jewish pupils at risk and limited, or completely impeded, their ability to learn or engage in
9 school programs or activities.” Further, “[t]his discrimination, harassment, and bullying,
10 including the use of inappropriate instructional materials and instruction, has deeply impacted
11 Jewish pupils across California and the nation resulting in the vilification and ostracization of
12 Jewish pupils.”

13 94. Despite being on notice of this “widespread surge in antisemitic discrimination”
14 and “severe and pervasive bullying,” Defendants have taken no meaningful steps to end the
15 scourge.

16 **III. DEFENDANTS HAVE THE POWER TO REMEDY ANTI-SEMITIC**
17 **DISCRIMINATION AND BIAS, JUST AS THEY HAVE REMEDIED**
18 **DISCRIMINATION AND BIAS AGAINST OTHER MINORITIES, BUT**
19 **THEY FAIL TO DO SO.**

20 95. The State of California has a long history of using its investigatory and
21 prosecutorial powers to enforce constitutional protections for marginalized groups. California’s
22 prosecutors have been particularly active in protecting children and schools from the pernicious
23 effects of discrimination. For example:

24 96. In the 2019 case *California v. Stockton Unified School District*, the State of
25 California sued the Stockton Unified School District for systemically referring Black and
26 Hispanic students and students with disabilities to law enforcement at higher rates than other
27 students, in violation of the Americans with Disabilities Act and the Fourth Amendment to the
28 U.S. Constitution, among other constitutional and statutory violations.⁴³

⁴³ Complaint, *California v. Stockton Unified Sch. Dist.*, Case No. 34-2019-00248766, ECF No. 1.

1 harassment so severe, pervasive, and offensive that it has deprived them of equal access to
2 educational benefits and opportunities. They have been additionally deprived of equal access to
3 education because they have had to suffer through and endure anti-Semitic textbooks,
4 instructional material, and teacher instruction, including through many ethnic studies courses in
5 school districts across the State. Some students were deprived of their public-school education
6 altogether, because their parents were forced to remove them from the hostile environment
7 created in their classrooms by discriminatory textbooks, instructional materials, and teacher
8 instruction. *See, e.g.*, ¶¶ 14, 40.

9 104. The State bears the non-delegable responsibility and the ultimate authority to
10 ensure that public schools are providing basic educational equality to all students, regardless of
11 their religion, ethnicity, nationality, or race. Cal. Const. Art. I, § 7; Cal. Const. Art. IX, § 5. The
12 Constitution prohibits Defendant State of California from maintaining and operating or financing
13 the common public school system in a way that denies educational equality to students, and the
14 Constitution requires that Defendants State Board of Education, CDE, and State Superintendent
15 Tony Thurmond take action when a local district's policies or practices deny basic educational
16 equality, unless there is a compelling reason for failing to do so. Here, there is clearly no such
17 compelling reason. Defendants are obligated to ensure equal access to educational opportunity
18 for all children enrolled in the schools and school districts they administer and/or oversee; to take
19 appropriate action to identify and eliminate policies and/or practices and conduct that interfere
20 with the equal participation by students in California instructional programs; to monitor and
21 ensure that California schools and their employees, including faculty, staff, and administrators,
22 are in compliance with state laws applicable to the provision of an education that is free of
23 discriminatory lessons, instructions, and materials; and, in the case of Defendant CDE, to
24 actively monitor the efficacy of district anti-Semitism complaint processes.

25 105. Defendants, though on notice of the disparities in the treatment of Jewish and
26 Israeli students by teachers, administrators, and fellow students and the failure to respond to the
27 harassment and harms they suffer, have chosen to allow Jewish and/or Israeli students, including
28 Plaintiffs, to be subject to attacks, punishment, unfounded discipline, and targeted bullying based

1 on aspects of their Jewish identity, including expressing support for Israel as part of their
2 religious, ethnic, and/or national origin identities and/or the perception that as Jews their identity
3 includes a connection to Israel. They have effectively adopted a policy of allowing Jewish and/or
4 Israeli students to be subjected to a variety of attacks from students and teachers.

5 106. Defendants have violated the rights of Plaintiffs and other Jewish and Israeli
6 students to receive equal protection of the laws, pursuant to Article I, section 7(a) and Article IV,
7 Section 16(a) of the California Constitution, by failing to monitor and take other steps to ensure
8 that schools are providing basic educational opportunities equal to those of non-Jewish and non-
9 Israeli students. Instead, Defendants have knowingly and intentionally allowed schools and
10 districts throughout the state to discriminate against Jewish and/or Israeli students through
11 policies and practices that treat Jewish and Israeli school children differently than similarly
12 situated individuals, simply because they are Jewish and/or Israeli, including by, without
13 limitation:

14 (i) refusing to conduct meaningful and effective investigations or to impose
15 corrective actions on schools and districts that have blatantly violated the State's
16 Education Code, including § 220, which prohibits "discrimination on the basis of
17 disability, gender, nationality, race or ethnicity, religion, sexual orientation . . . in
18 any program or activity conducted by an educational institution that receives, or
19 benefits from, state financial assistance or enrolls pupils who receive state student
20 financial aid";

21 (ii) refusing to conduct meaningful and effective investigations or to impose
22 corrective actions on schools and districts that allow for Jewish and/or Israeli
23 children to be taunted, ridiculed, humiliated, and assaulted by their peers and by their
24 teachers for being Jewish and/or Israeli, including through expressing their familial,
25 religious, ethnic, and/or national origin connections to Israel;

26 (iii) permitting teachers to impose unfounded discipline and other penalties on
27 Jewish and/or Israeli students who express their Jewish identity by showing support
28 for Israel without any redress or recourse, even though such conduct violates the

1 State’s Education Code, including § 220;

2 (iv) permitting or not enforcing requirements on schools and districts to truthfully,

3 timely, or accurately report incidents of anti-Semitism on campus when it occurs;

4 (v) being on notice and implicitly allowing prohibited and discriminatory “ethnic

5 studies” lessons that Defendants know present ahistorical and anti-Semitic

6 falsehoods and violate the State’s Education Code, including §§ 51500, 51501,

7 51225.3, and 60044;

8 (vi) refusing to conduct meaningful and effective investigations or to impose

9 corrective actions on schools and districts that impart (and/or allow) discriminatory,

10 anti-Semitic, and ahistorical narratives in curriculum and instructional materials in

11 courses, including ethnic studies courses, and allow for the use of instructional

12 materials created by teachers unions and other third parties not approved to create

13 curricula in violation of the State’s Education Code, including §§ 51500, 51501,

14 51225.3, and 60044;

15 (vii) allowing Jewish and/or Israeli students to be subject to discrimination that

16 violates multiple provisions of the State’s Education Code, including §§ 220, 51500,

17 51501, 51225.3, and 60044, that would not be—and is not—permitted towards other

18 marginalized groups; and

19 (viii) failing to adequately monitor the UCP processes to ensure that viable

20 complaints of discrimination and bias are met with timely recourse that addresses

21 and remediates the violating conduct.

22 107. Student Plaintiffs and student members of Plaintiff the Coalition have a personal

23 interest in their educational rights, and Defendants have an obligation under state law to ensure

24 their equal protection and access to education.

25 108. Absent the injunctive and declaratory relief Plaintiffs seek, Defendants will

26 continue to violate the rights of these Plaintiffs and other Jewish and/or Israeli students enrolled

27 in California public and charter schools to receive equal protection of the laws under the

28 California Constitution, and Plaintiffs will continue to suffer irreparable harm.

1 **SECOND CAUSE OF ACTION**

2 **Violation of the Equal Protection Clause of the California Constitution, Article I, § 7**
3 **(Segregation of Jewish and/or Israeli Students)**
4 **Against All Defendants**

5 109. Plaintiffs incorporate by reference all preceding paragraphs of this Complaint as
6 though fully set forth herein.

7 110. The California Constitution’s Equal Protection Clause prohibits the State from
8 adopting policies or taking other actions that disproportionately impact students’ access to
9 educational opportunities. *See* Cal. Const., Art. I, § 7; *Butt v. State of California*, 4 Cal. 4th 668,
10 685 (Cal. 1992).

11 111. An equal protection claim is appropriate when there is de facto segregation in the
12 schools, impacting a district’s educational quality, and no action is taken to correct that policy
13 when its impacts are identified.

14 112. Here, the segregation is clear and on multiple levels. Schools and districts are
15 responding to complaints of anti-Semitism by removing Jewish and/or Israeli children from
16 classes with teachers or bullies who engage in anti-Semitic activity instead of addressing the
17 bullying and harassment at issue. Plaintiff Ilana Pearlman’s child was removed from his art class
18 because the teacher displayed violent imagery of a fist punching through a Jewish star to
19 celebrate the October 7th massacre. *See* ¶ 31. Dawn and Michael Rosenthal’s child, B.R., was
20 segregated from his honors chemistry course and forced to take an online class by himself, on his
21 own time outside of school, because the school refused to take any action against his teacher who
22 celebrated October 7th with mocking anti-Semitic rhetoric on the classroom whiteboard. *See*
23 ¶¶ 33-34. Melissa Alexander’s child was forced to transfer out of the class where his teacher
24 made up false allegations and disciplined and punished him for wearing a Jewish star and Israel-
25 related clothing rather than the school addressing the teacher’s targeting of a 12-year-old Jewish
26 child. *See* ¶ 28.

27 113. Further, Jewish and/or Israeli students are also leaving their school districts in
28 unprecedented numbers to escape virulent anti-Semitism. For example, nearly 1,000 students left
the Oakland Unified School District in the 2023-2024 school year—a number that district
officials said was “probably boosted by Jewish families leaving the district, citing anti-Israel

1 sentiments among teachers and staff that made them feel uncomfortable or unsafe.”⁴⁶ Schools
2 and districts are also offering the Jewish and/or Israeli victims of bullying and harassment
3 transfers to neighboring schools and districts instead of addressing the discrimination. On
4 information and belief, these same dynamics of Jewish parent/student “flight” are present in Los
5 Angeles County schools, in particular within the Los Angeles Unified School District. The result
6 of this de facto segregation is a system of schools and classes where Jews and Israelis are
7 unwelcome and, thus, classes and schools are becoming “Judenfrei” or Jew free.

8 114. This de facto segregation causes an appreciable impact to educational quality,
9 because Jewish and Israeli students are left unprotected from harassment and discrimination at
10 school.

11 115. School segregation separating Jewish and/or Israeli students from non-Jewish and
12 non-Israeli students historically leads to disparities in educational outcomes and the perpetuation
13 of discrimination and hate. The segregation of Jewish and/or Israeli students in California also
14 limits all students’ exposure to diverse perspectives and allows anti-Semitic indoctrination to
15 flourish in the classrooms and schools with no Jewish or Israeli students.

16 116. The State bears the non-delegable responsibility and the ultimate authority to
17 ensure that public schools are providing basic educational equality to all students, regardless of
18 their religion, ethnicity, nationality, or race. Cal. Const. Art. I, § 7; Cal. Const. Art. IX, § 5. This
19 includes ensuring that students are not segregated based on their religion, ethnicity, nationality,
20 or race. The Constitution prohibits Defendant State of California from maintaining and operating
21 or financing the common public school system in a way that allows for de facto segregation, and
22 the Constitution requires that Defendants State Board of Education, CDE, and State
23 Superintendent Tony Thurmond take action when a local district’s policies or practices result in
24 the segregation of minority students, including Jewish and/or Israeli students.

25 117. Defendants, though on notice of the de facto segregation of Jewish and Israeli
26 students, have chosen to allow Jewish and/or Israeli students, including Student Plaintiffs, to be

27
28 ⁴⁶ Jill Tucker, *The number of families fleeing Oakland schools is spiking. Here’s what’s going on*, San Francisco Chronicle (Jan. 17, 2024), <https://www.sfchronicle.com/bayarea/article/ousd-oakland-schools-students-18610733.php>.

1 segregated from their non-Jewish and non-Israeli classmates for expressing support for Israel as
2 part of their religious and ethnic identities or merely seeking help when harmed by their fellow
3 students' or teachers' anti-Semitic conduct.

4 118. Defendants have violated the rights of Plaintiffs and other Jewish and Israeli
5 students to receive equal protection of the laws, pursuant to Article I, Section 7(a) of the
6 California Constitution, by failing to act and enforce the laws in place to protect Jewish and/or
7 Israeli students from segregation.

8 119. Student Plaintiffs and student members of Plaintiff the Coalition have a personal
9 interest in their educational rights, and Parent Plaintiffs and parent members of the Plaintiff
10 Coalition have a personal interest in the upbringing of their children, including their education.
11 Defendants have an obligation under state law to ensure their equal protection and access to
12 education.

13 120. Absent the injunctive and declaratory relief Plaintiffs seek, Defendants will
14 continue to violate the rights of these Plaintiffs, and other Jewish and/or Israeli students enrolled
15 in California public and charter schools, to enjoy an education free of segregation based on their
16 Jewishness and/or Israeli nationality, and they will continue to suffer irreparable harm.

17 **THIRD CAUSE OF ACTION**

18 **Violation of the Free Exercise Clause of the California Constitution, Article I, § 4**
19 **Plaintiffs the Coalition, Melissa Alexander, Ilana Pearlman, and**
20 **Dawn and Michael Rosenthal, on Behalf of Themselves and Their Children,**
21 **and Ivy Chesser and Y.Z.**
22 **Against All Defendants**

23 121. Plaintiffs incorporate by reference all preceding paragraphs of this Complaint as
24 though fully set forth herein.

25 122. Article I, Section 4 of the California Constitution provides that, "Free exercise
26 and enjoyment of religion without discrimination or preference are guaranteed."

27 123. For many of the Plaintiffs, including Melissa Alexander, Ilana Pearlman, and
28 Dawn and Michael Rosenthal and their children, Ivy Chesser and Y.Z., and some members of the
Coalition, connection to Israel is a fundamental tenet of faith and part of their religious practice.
For them, supporting Israel as the Jewish homeland is a sincerely held religious commitment.

1 When Plaintiffs are disciplined by their teachers for wearing Jewish star necklaces or shirts
2 showing support for Israel, *see* ¶¶ 26, 28, or forced to watch their teachers celebrate the October
3 7th massacre against Israelis and mock Jews for not doing so, *see* ¶¶ 29, 33, this is no different
4 from a teacher disciplining a student for wearing a cross on a necklace or a hijab or encouraging
5 the class to celebrate or laugh at the murder of Protestant or Catholic civilians during the
6 Troubles in Northern Ireland. When a Jewish mother is mocked by school employees as a
7 “Zionist Nazi bitch” for expressing her religious connection to Israel, *see* ¶ 51, and no one in the
8 school reprimands those responsible or takes action, that is an implicitly school-sanctioned attack
9 on her religious beliefs. In sum, Plaintiffs are unable to express their religious beliefs and
10 practices as Jews without fear of—or actual—reprisal from their teachers, administrators, and
11 schools. Due to the unchecked hostility from their peers, teachers, and school administrators,
12 student Plaintiffs are unable to freely express their religious beliefs and are cowed into hiding
13 their religious identities. And this same unchecked hostility significantly burdens parent
14 Plaintiffs’ free exercise of religion by substantially interfering with their ability to direct the
15 religious development of their children.

16 124. Defendants, though on notice of the discrimination, segregation, and other harms
17 Plaintiffs and other Jewish students and families have suffered for expressing support for Israel
18 or refusing to denounce Israel in violation of their religious beliefs and practices, have failed to
19 take action. Even though they are aware that teachers and administrators have explicitly or
20 implicitly required Jewish students and parents to either violate their religious beliefs, be
21 excluded from classes and segregated from other students, or exposed to harassment, they have
22 allowed such conduct to continue in an unfettered fashion.

23 125. The State bears the non-delegable responsibility and the ultimate authority to
24 ensure that public institutions are not substantially burdening citizens’ religious beliefs or
25 practices, unless doing so is for the purpose of achieving a compelling interest through the least
26 restrictive means. Cal. Const. Art. I, § 4; Cal. Const. Art. IX, § 5. The Constitution prohibits
27 Defendant State of California from maintaining and operating or financing the common public
28 school system in a way that unconstitutionally infringes on students’ or parents’ free exercise of

1 religion, and the Constitution requires that Defendants State Board of Education, CDE, and State
2 Superintendent Tony Thurmond take action when a local district's policies or practices result in
3 such violations.

4 126. Defendants have deprived Plaintiffs of the free exercise and enjoyment of religion
5 by, among other things, encouraging or permitting teachers, administrators, and others to tell
6 their young charges, *inter alia*, that the Jewish State of Israel and those who support it are
7 demonic, that Jews are Nazis, that killing Jews is justified, and that the State of Israel itself is
8 illegitimate and has no right to exist. Teachers who teach such lessons often make clear that they
9 will tolerate no disagreement and that anyone with the courage to take a different position is to
10 be frowned upon and shunned. Similar messages are sent at school board meetings. And non-
11 Jewish students are led to understand they can bully their Jewish peers without fear of
12 punishment. Jewish parents of California school children are being forced to choose between
13 attending public school and having their religion undermined—or moving from their district,
14 attending costly private schools, or resorting to homeschooling.

15 127. Defendants have furthered no legitimate—let alone compelling—state interest
16 through their conduct and inaction. Defendants have also failed to tailor their actions narrowly to
17 serve any such interest, including because there is no defensible, let alone compelling, interest in
18 requiring Jewish students and families to restrict their religious beliefs regarding Judaism and
19 Israel.

20 128. Absent the injunctive and declaratory relief Plaintiffs seek, Defendants will
21 continue to violate the rights of these Plaintiffs, and other Jewish students and parents, to partake
22 in the California school system and related communal events, including school board meetings,
23 without having their religious beliefs substantially infringed upon and burdened.

24 **PRAYER FOR RELIEF**

25 WHEREFORE, Plaintiffs respectfully pray for judgment as follows:

26 A. Declaring that Defendants have (1) violated Article I, § 7(a) and Article IV,
27 § 16(a) of the California Constitution by failing to provide a free and equal education to
28 California's Jewish students and by failing to enforce state laws that would protect California's

1 Jewish students from discrimination and harassment, and (2) violated Article I § 4 of the
2 California Constitution by violating the rights of Jewish students and parents in substantially
3 infringing upon and burdening their religious beliefs;

4 B. Issuing the following preliminary and permanent injunctive relief to compel
5 Defendants to:

- 6 a. monitor and publish the number of complaints alleging anti-Semitism filed in
7 each Local Education Agency (“LEA”) or District;
- 8 b. provide targeted resources, funding, and technical assistance to ensure
9 implementation in these LEAs and/or Districts;
- 10 c. appoint a committee of experts to review all ethnic studies curricula and
11 teacher trainings purchased, developed, and/or used by LEAs or Districts
12 since 2021 for compliance with anti-bias and anti-discrimination provisions in
13 Cal. Educ. Code §§ 200, 201, 220, 51500, 51501, 51225.3, and 60044; and to
14 ensure that LEAs and/or Districts do not include in their ethnic studies
15 curricula any portion of the 2019 and 2020 draft Model Ethnic Studies
16 Curricula that the Instructional Quality Commission rejected as biased and
17 discriminatory, Cal. Educ. Code § 51225.3(a)(1);
- 18 d. appoint an appropriate independent monitor or compliance officer with
19 expertise in anti-Semitism and anti-Jewish and anti-Israel discrimination and
20 bias for each recalcitrant LEA and/or District to investigate and to oversee
21 implementation and enforcement of court-ordered reforms, including but not
22 limited to, Los Angeles Unified, Berkeley Unified, Campbell Union High
23 School District, Fremont Unified, San Francisco Unified, and Oakland
24 Unified;
- 25 e. provide quarterly compliance reports to the court and to Plaintiffs;
- 26 f. publish statewide data regarding UCP and CDE complaints involving anti-
27 Semitism filed in each LEA or District, including CDE appeal decisions;
- 28 g. make continuation of state funding contingent on uniform enforcement of

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each District’s code of conduct indiscriminately to all students, employees,
faculty members, and third-party contractors;

h. mandate anti-Semitism training for all teachers, administrators, and academic
staff, in coordination with the Brandeis Center and StandWithUs;

C. Awarding Plaintiffs all costs of suit, including attorney fees and costs under Cal.
Civ. Proc. Code § 1021.5 and any other applicable law; and

D. Awarding such other and further relief as the Court deems equitable and just.

1 DATED: February 26, 2026

Respectfully submitted,

2 /s/ L. Rachel Lerman

/s/ Micah G. Block

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