

24-1237-CV

United States Court of Appeals *for the* Second Circuit

MINISTER LOUIS FARRAKHAN, NATION OF ISLAM,

Plaintiffs-Appellants,

– v. –

ANTI-DEFAMATION LEAGUE, JOHNATHAN GREENBLATT, individually,
in his official capacity as CEO and national director of the Anti-Defamation
League, RABBI ABRAHAM COOPER, individually and in his official capacity
as Director of Social Global Action Agenda for Simon Wiesenthal Center,
SIMON WIESENTHAL CENTER,

Defendants-Appellees.

ON APPEAL FROM THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

APPENDIX Volume 2 of 2 (Pages A-211 to A-396)

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SWC: Farrakhan's Annual Savior's Day Anti-Jewish Tirades Continue As Does Silence of Political and Faith Leaders



March 1, 2023

The Simon Wiesenthal Center is condemning Louis Farrakhan's latest Savior's Day anti-Semitic and anti-Judaic diatribes during the Nation of Islam's annual conference in Chicago.

In Farrakhan's latest address – "The War of Armageddon Has Begun"— he unleashes a tsunami of Jew hatred accusing Jews of controlling world governments, the media, and financial institutions. Throughout, Farrakhan invoked the New Testament's "Synagogue of Satan," to demonize Judaism and those who revere the Torah.

Farrakhan repeated his mantra that Jews allegedly exert power over Black celebrities. He defended both Ye (Kanye West) and Kyrie Irving, praising Ye as "a very great brother, a genius," and "a young god."

"Four decades of non-stop vicious Jew-hatred from Louis Farrakhan has borne poison fruit in the mainstream of our society. Words lead to action and his toxic hatred has been absorbed by many including Kanye West. We urge all our neighbors to reject his hate and we must commit to strengthen our relationships for the betterment of all Americans whatever their color creed or orientation," stated SWC Associate Dean and Director of Global Social Action Agenda, Rabbi Abraham Cooper.

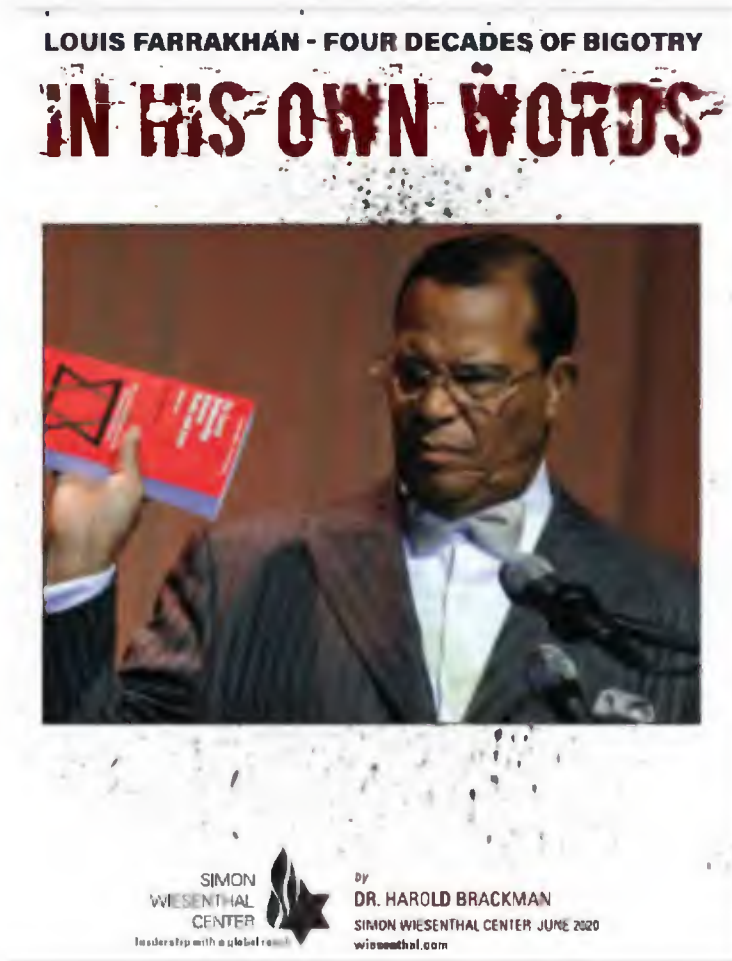
"We have tracked and denounced Farrakhan and his trail of Jew-hatred and anti-Semitic incitement for four decades. Yet, the godfather of hate has rarely been publicly criticized. Indeed, access to this year's speech was handled by Ticketmaster, at a time when American Jewry is reeling from violent anti-Semitic hate crimes. Farrakhan has rarely been held accountable for his serial Jew-hatred and in 2023, Ticketmaster and others have monetized his

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hate and expanded the reach of his hatred," Cooper concluded.

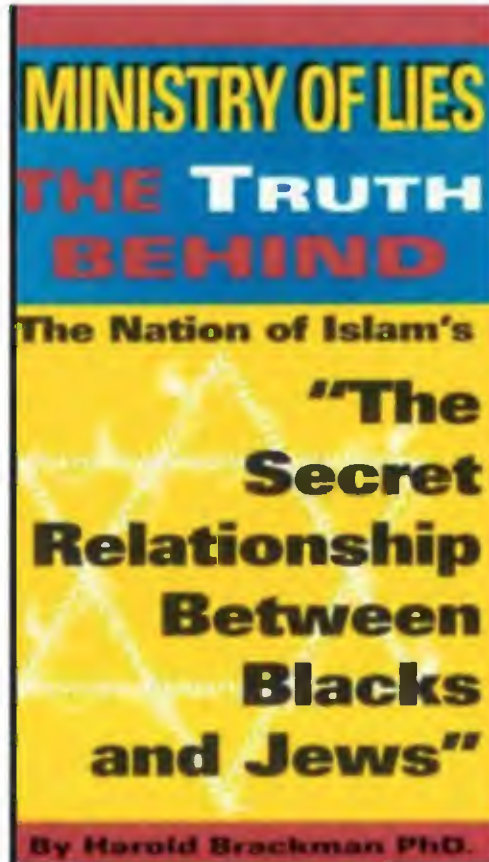
See below SWC's previous reports exposing four decades of Louis Farrakhan's hate and anti-Semitism:



Farrakhan Four Decades of Bigotry

This report was prepared amidst an unprecedented national reckoning about past and present racism. Many prominent Americans, including politicians, social activists, NGO leaders, and cultural figures, continue to praise and endorse Minister Louis Farrakhan, who, for forty years, has exploited every opportunity to inject anti-Semitism, homophobia and hate into our society's mainstream.

Read full report here



Farrakhan's "Reign of Historical Error": The Truth Behind The Secret Relationship Between Blacks and Jews.

This 96-page study specifically refutes the hateful canard that Jews dominated African slave trade for hundreds of years.

For further information, please email Michele Alkin, Director of Global Communications at malkin@wiesenthal.com or Shawn Rodgers at srodgers@wiesenthal.com, join the Center on Facebook, or follow @simonwiesenthal for news updates sent directly to your Twitter feed.

The Simon Wiesenthal Center is an international Jewish human rights organization numbering over 400,000 members. It holds consultative status at the United Nations, UNESCO, the OSCE, the Council of Europe, the OAS and the Latin American Parliament.

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Exhibit FF

THE U.S. NATIONAL STRATEGY TO COUNTER ANTISEMITISM

MAY 2023



THE WHITE HOUSE
WASHINGTON

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THE WHITE HOUSE

WASHINGTON

May 25, 2023

Six years ago, Neo-Nazis marched from the shadows through Charlottesville, Virginia, chanting, “Jews will not replace us.” With torches in hand, they spewed the same antisemitic bile and hate that were heard across Europe in the 1930s. What happened in Charlottesville—the horror of that moment, the violence that followed, and the threat it represented for American democracy—drove me to run for President. The very soul of our Nation was hanging in the balance. It still is today.

Repeated episodes of hate—including numerous attacks on Jewish Americans—have since followed Charlottesville, shaking our moral conscience as Americans and challenging the values for which we stand as a Nation. That is why I convened the first-ever United We Stand Summit at the White House in September 2022: to bring communities from across the country together to combat hate in all its forms—including the persistent scourge of antisemitism—that has long plagued our Nation. We must stand united—regardless of our backgrounds and beliefs—to affirm that an attack on any one group of us is an attack on us all and that hate can have no safe harbor in America.

Together, we must acknowledge and confront the reality that antisemitism is rising, both at home and abroad. Loud voices are normalizing this venom, but we must never allow it to become normal. Antisemitism threatens not only the Jewish community, but all Americans. People who peddle these antisemitic conspiracy theories and fuel racial, ethnic, and religious hatred against Jews also target other communities—including Black and brown Americans; Asian Americans, Native Hawaiians, and Pacific Islanders; LGBTQI+ individuals; Muslim Americans; women and girls; and so many others. Our intelligence agencies have determined that domestic terrorism rooted in white supremacy—including antisemitism—is the greatest terrorist threat to our Homeland today.

By seeking to turn the masses against the few, by scapegoating and dehumanizing others—and most of all—by stoking violence, the perpetrators of hate aim to upend our most cherished values and undermine our efforts to build a culture of respect, peace, and cooperation. Protecting the Jewish community from antisemitism is essential to our broader fight against all forms of hate, bigotry, and bias—and to our broader vision of a thriving, inclusive, and diverse democracy.

History teaches that hate never fully goes away; it only hides until it is given just a little oxygen. That is why we must confront antisemitism early and aggressively whenever and wherever it emerges from the darkness.

Toward that aim, my Administration has developed the first U.S. National Strategy to Counter Antisemitism. It represents the most ambitious and comprehensive U.S. government-led effort to fight antisemitism in American history. It also brings Americans together—regardless of our

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backgrounds and beliefs—to stand united against the hate, racism, bigotry, and violence that have long haunted our Nation. The Strategy outlines a whole-of-society effort to combat antisemitism, including unprecedented, coordinated, and bold actions that will be implemented across government agencies, as well as calls to action for public officials, private sector leaders, and Americans from every sector, industry, and walk of life. The Strategy—which reflects input from over 1,000 Jewish community stakeholders, faith and civil rights leaders, State and local officials, and more—also serves as a blueprint for tackling other forms of bigotry, hate, and bias that fuel toxic divisions in America.

Fortunately, what the Neo-Nazi marchers in Charlottesville did not account for was the extraordinary decency of the vast majority of Americans and the simple truth that we are a great Nation because we are a good people. A people that derives strength from our diversity and from the commitment of each successive generation to push us closer to realizing the promise of America for all Americans. It is a promise founded on the belief that we are all created equal and deserve to be treated equally throughout our lives. While we have never fully lived up to that promise, we have never walked away from it either. And we will never stop fighting until we all see each other as we should—as fellow human beings.

Through this U.S. National Strategy to Counter Antisemitism, we are taking a historic step forward. I am proud to lead my Administration's efforts to counter antisemitism, and I urge all Americans to join me in ensuring that in America, evil will not win. Hate will not prevail. The venom and violence of antisemitism will not be the story of our time. The power lies within each of us to transform that story. To rise together against hate. To show the world who we are. And to restore the soul of America together.

A handwritten signature in black ink, appearing to read "Donald Trump", with a large diagonal slash through it.



Legal Disclaimer

The U.S National Strategy to Counter Antisemitism does not supersede, modify, or direct an interpretation of any existing federal, state, or local statute, regulation, or policy. It does not constitute binding guidance for the public, states, localities, or Federal agencies and therefore does not require compliance with the principles described herein. The strategy does not purport to alter or preempt existing statutes, regulations, policies, or the requirements of the Federal, state, or local agencies that enforce them. The strategy shall therefore be implemented consistent with applicable law and subject to the availability of appropriations.

Nothing in this strategy shall be construed to impair or otherwise affect or influence the authority of the Department of Justice, including the Federal Bureau of Investigation, in the performance of their responsibilities with regard to the direction, conduct, control, planning, investigation, organization, equipment training, exercises, or other activities concerning counterterrorism, intelligence, and law enforcement activities. Such activities are outside the scope of the strategy. This strategy should also therefore not be construed to discuss or comment on any ongoing federal litigation or investigation.

The appropriate application of the principles set forth in the strategy depends significantly on the context in which the principles are being applied. In some circumstances, application of these principles in whole or in part may not be appropriate. Even in contexts where these principles may not apply in whole or in part, federal departments and agencies remain subject to existing laws, regulations, and policies.

The strategy is not intended to, and does not, create any legal right, benefit, or defense, substantive or procedural, enforceable by law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person, nor does it constitute a waiver of sovereign immunity.



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Overview

Hate and the violence it fuels are on the rise in America. Hate crimes, targeted violence, and acts of harassment—including online abuse—have increased in recent years, eroding our democracy, decreasing public trust, and putting so many American communities at risk.¹ We have seen this unfold from bomb threats at Historically Black Colleges and Universities, to rising hate crimes against Asian Americans, Native Hawaiians, and Pacific Islanders (AANHPIs) fueled by the COVID-19 pandemic, to escalating threats against women and LGBTQI+ Americans, to persistent bias and violence against Muslim, Sikh, and South Asian communities, to harassment of Jews and attacks on Jewish communities.

Antisemitism is often called “the oldest hatred,” yet it remains all too present today—including in America. Acts of antisemitism are on the rise—including online harassment, vandalism, bomb threats, and violent attacks against Jewish institutions and Jewish people.² In 2022, Federal Bureau of Investigation (FBI) Director Christopher Wray noted that American Jews account for 2.4% of the U.S. population, but antisemitism drove 63% of reported religiously motivated hate crimes.³ Perhaps most alarming, antisemitism has become increasingly “normalized” in American society.

While antisemitism most directly and intensely affects the American Jewish community, antisemitism also threatens the democracy, values, safety, and rights of all Americans. The hatred of Jews shares much in common with other forms of hate, such as racism, Islamophobia, homophobia, transphobia, and misogyny; it also has unique characteristics that require tailored responses and can manifest distinctively. While many American Jews identify as a vulnerable minority group, especially as antisemitism surges, Jews tend to be assailed for having too much privilege or too much power. This is a persistent feature of antisemitism: it rests on a conspiracy theory.⁴ At its core, antisemitism, like numerous forms of hate, divides Americans by scapegoating certain people, erodes our trust in government and social institutions, threatens our democracy, and undermines our core values of freedom, community, and decency. Thus, it is imperative that Americans of all backgrounds and beliefs work together to counter this scourge with urgency.

This strategy represents the most comprehensive and ambitious U.S. government effort to counter antisemitism in American history. To implement this strategy, executive agencies will take a broad array of actions to address antisemitism. But the federal government cannot address antisemitism alone. This strategy also calls on Congress to act and play its part in countering antisemitism. It urges action from all of society—state and local authorities, civil society, community and faith leaders, the private sector, individual citizens. This strategy advances a whole-of-society approach to countering antisemitism, resting on four pillars:

- 1: Increase awareness and understanding of antisemitism, including its threat to America, and broaden appreciation of Jewish American heritage.
- 2: Improve safety and security for Jewish communities.
- 3: Reverse the normalization of antisemitism and counter antisemitic discrimination.
- 4: Build cross-community solidarity and collective action to counter hate.

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This U.S. National Strategy to Counter Antisemitism calls for action now and over the long term. The Biden-Harris Administration is committed to leading its effective implementation and leveraging it to advance our fight against all other forms of hate.



Framing the Challenge and Solution

For over 2,000 years, Jews have been targeted for persecution and violence for their practices, their beliefs, their identity—even their very existence. They have been driven from their homes and barred from certain jobs or compelled to take others. They have been denied citizenship and forced into ghettos. They have been scapegoated en masse and systematically killed. Antisemitism has enabled some of the darkest moments in history, including the Nazi campaign to exterminate the Jewish people during the Holocaust.⁵

For centuries, the United States has been a refuge for Jews fleeing antisemitism. Throughout American history, Jews from around the world have sailed to our shores in search of sanctuary. Jews found a home here and have shaped the story of our country through invaluable and ongoing contributions to American arts, culture, law, justice, business, medicine, sports, science, freedom, equality, and so much more. They fought for religious freedom, helping define one of America's bedrock principles. Jewish suffragists worked to expand freedom and justice and Jewish faith leaders linked arms with giants of the Civil Rights Movement to demand equal rights for all.⁶

But the United States has not been immune from the scourge of antisemitism. White supremacy, prejudice and bigotry, and conspiratorial thinking have fueled antisemitic discrimination and violence throughout American history.

In the fallout from the financial panic of 1893, populists adopted antisemitism as part of their campaign against banks. In the early twentieth century, as Black Americans were frequently targeted by violence and lynching, the 1913 lynching of Leo Frank, a 31-year-old Jewish factory owner in Georgia, contributed to the reemergence of the KKK.⁷ As the KKK inflicted horrific violence and terror on Black Americans, it also targeted and sought to portray Jewish and Catholic Americans, among others, as threats to the Nation.⁸ In the 1920s, various white-collar professions restricted Jews from entering certain fields, and many universities imposed Jewish quotas.⁹

Antisemitism spiked during the 1920s and 1930s when right-wing populists, including Father Charles Coughlin, spread antisemitic conspiracy theories.¹⁰ As World War II broke out, the isolationist movement in the United States spread accusations that Jewish financiers were secretly driving U.S. policy—a view advocated by the prominent airplane pioneer Charles Lindbergh.¹¹ The Nazis borrowed from Jim Crow laws to implement the Nuremberg Laws that isolated Jews as a separate race, before initiating the Holocaust to eradicate the Jewish people, as well as murder Roma and Sinti, Black, LGBTQI+, and Slavic people, people with disabilities, and other religious minorities.¹² Despite some knowledge of Nazi atrocities, the United States government did not ease immigration quota restrictions on Jews, and even turned away Jewish refugees fleeing from the Nazis.¹³

Antisemitism in the U.S. is now on the rise again. As in previous eras, demographic changes, new technologies, economic disruptions and deepening socioeconomic inequality may be leading more Americans to turn to conspiracy theories that scapegoat Jews and other vulnerable communities. Violent attacks against Jews are increasing at a time when hate crimes and other acts of targeted violence against many communities have risen.¹⁴ Verbal harassment, bomb threats, and vandalism against Jewish people, synagogues, and community institutions such as



Jewish day schools and community centers, remain prevalent.¹⁵ Tragically, these antisemitic incidents are all too often deadly. Moreover, acts of violence animated by antisemitic beliefs frequently target other communities. Violent extremists who perpetrate these attacks against Jewish communities and other targeted groups often subscribe to white supremacist conspiracy theories like the so-called “great replacement theory.”¹⁶ Indeed, antisemitic conspiracy theories are often foundational to white supremacy as well as numerous other violent extremist ideologies. For example, in January 2022, an armed hostage-taker motivated by other violent notions terrorized the members of a synagogue in Colleyville, Texas.

Although high-profile incidents of antisemitism have drawn much attention, antisemitism has become a widespread, consistent threat. Surveys and reports from civil society actors reach similar conclusions.¹⁷ The Anti-Defamation League (ADL) recorded 3,697 antisemitic incidents in 2022—an increase of 36% over 2021 and the highest number since the ADL began tracking these numbers in 1979.¹⁸ The ADL estimates that 36% of Jews experienced antisemitic harassment online in 2021.¹⁹ In addition, during the COVID-19 pandemic, antisemitic conspiracy theories surfaced suggesting that Jews or the government of Israel spread the coronavirus to advance global influence.²⁰ Elected officials and others even made antisemitic comparisons between the Holocaust and public health measures.²¹

The American Jewish community is diverse, and Jews from a wide variety of backgrounds and identities face hate and antisemitism. That includes Jews who adhere to different levels of religious observance or denominations of practice, Jews of color, first-generation Americans, LGBTQI+ Jews, Jews with disabilities, Jews who live in urban and rural communities, Jews of different political affiliations, and Jews of different socioeconomic and income levels. Though there are many ways of being Jewish, any Jew or anyone perceived to be Jewish can be the target of antisemitism.

Jewish communities impacted by antisemitic discrimination and violence are increasingly concerned about their safety. As antisemitism has spread widely, it has caused a deep sense of fear and anxiety in many Jewish Americans’ daily lives. Jews are targeted going to synagogue and to school. Countless Jewish institutions across the country are now under armed guard, prompting profound anxiety in the communities they serve. Some traditionally observant Jews, especially traditional Orthodox Jews, are victimized while walking down the street. Jewish students and educators are targeted for derision and exclusion on college campuses, often because of their real or perceived views about the State of Israel. When Jews are targeted because of their beliefs or their identity, when Israel is singled out because of anti-Jewish hatred, that is antisemitism. And that is unacceptable.

In recent months, celebrities, athletes, and politicians have used their influential platforms to deny the Holocaust, elevate bigots, and spread antisemitic conspiracy theories.²² These viewpoints are not just reprehensible, they are dangerous.

History shows that we cannot allow antisemitism to fester. Where antisemitism and other forms of hatred are left to rage, democracy and American values are at risk. So too are freedom, security, and stability. Antisemitism, like numerous forms of hate, seeks to divide Americans from one another. It undermines our democracy and erodes trust in government, social institutions, and the basic values of our society. Antisemitism is not only a threat to Jewish Americans; it is a threat to all of us.

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As President George Washington wrote to the Touro Synagogue in 1790, “[T]he Government of the United States, which gives to bigotry no sanction, to persecution no assistance requires only that they who live under its protection should demean themselves as good citizens...May the Children of the Stock of Abraham, who dwell in this land, continue to merit and enjoy the good will of the other Inhabitants; while everyone shall sit in safety under his own vine and fig tree, and there shall be none to make him afraid.”²³

Now, again, we must recall our historic national obligation to ensure people of all faiths and traditions are free to practice their faith and live their cultural identities without fear of persecution. We must confront antisemitism in America with urgency. This national strategy sets forth the plan to do so.



Our Strategic Approach

Countering antisemitism demands a whole-of-society effort that both meets this moment of escalating hatred and lays the foundation for reducing antisemitism over time, addressing the challenge of antisemitism as both urgent and enduring. Our efforts must be grounded in bringing together Americans from all backgrounds and beliefs to spark allyship, unity, and collective action.

To develop this strategy, we held listening sessions with more than 1,000 diverse stakeholders across the Jewish community and beyond. These sessions have included Jews from diverse backgrounds and all denominations. We met at the White House with Special Envoys who combat antisemitism around the globe to learn from their best practices. We engaged bipartisan leaders in Congress and from across civil society, the private sector, technology companies, civil rights leaders, Muslim, Christian, and other faith groups, students and educators, and countless others. These listening sessions with stakeholders sought their perspectives, analysis, expertise, and views on how antisemitism manifests today and how we should fight it at every level, from the national scale to the grassroots. These discussions both provided critical insights into the experience of antisemitism in America and produced concrete ideas to counter it. They will also help inform subsequent comprehensive U.S. efforts to combat Islamophobia and related forms of bias and discrimination.²⁴

Although antisemitism remains a pernicious global problem, the scope of this national strategy is domestic. The strategy is focused on countering the threat and manifestations of antisemitism in the United States of America. The U.S. Government, led by the Department of State, will continue to combat antisemitism abroad and in international fora—including efforts to delegitimize the State of Israel.

As we confront antisemitism, we do so with profound respect for our democratic traditions, including free expression and speech protected by the First Amendment. We also do so with an unshakable commitment to the State of Israel's right to exist, its legitimacy, and its security. In addition, we recognize and celebrate the deep historical, religious, cultural, and other ties many American Jews and other Americans have to Israel.

This strategy directs action across the Administration and calls on Congress, state and local governments, and nongovernmental entities throughout American society to address both antisemitism and its root causes in the United States. Each portion of the strategy features actions that can be taken by the executive branch, by Congress, and by other key actors in American society to tackle the scourge of antisemitism. We are committed to implementing the steps outlined for the executive branch expeditiously and effectively. We are, moreover, eager to work with Congress on the actions that require federal legislative action. And we are improving our capacity to partner with those outside government contributing to these efforts, including by making available, as appropriate, information, expertise, and resources. While we cannot require actors outside the executive branch to take on the roles envisioned for them in this strategy, combating antisemitism is a truly whole-of-society challenge that demands a whole-of-society response, and we hope all will join our call to action.

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Every actor and sector must do its part, and the Biden-Harris Administration will lead in mobilizing this whole-of-society response across four pillars:

- **Pillar 1: Increase awareness and understanding of antisemitism, including its threat to America, and broaden appreciation of Jewish American heritage**
- **Pillar 2: Improve safety and security for Jewish communities**
- **Pillar 3: Reverse the normalization of antisemitism and counter antisemitic discrimination**
- **Pillar 4: Build cross-community solidarity and collective action to counter hate**



Pillar 1: Increase Awareness and Understanding of Antisemitism, Including its Threat to America, and Broaden Appreciation of Jewish American Heritage

Increasing awareness and understanding of antisemitism must be coupled with a commitment to broadening appreciation of Jewish American heritage. We must tell the positive story of Jewish contributions to the United States and the world. Consistent with the Biden-Harris Administration’s comprehensive approach to advancing equity for all and celebrating the heritage of America’s many diverse communities, we will also broaden awareness and understanding of Jewish American heritage.

In order to confront and counter antisemitism, Americans must recognize and understand it. Far too many do not. Without awareness of antisemitism and education about the threat it poses, Americans across society cannot identify and address antisemitism. If we cannot name, identify, and admit a problem, we cannot begin to solve it.

Antisemitism is a stereotypical and negative perception of Jews, which may be expressed as hatred of Jews. It is prejudice, bias, hostility, discrimination, or violence against Jews for being Jews or Jewish institutions or property for being Jewish or perceived as Jewish. Antisemitism can manifest as a form of racial, religious, national origin, and/or ethnic discrimination, bias, or hatred; or, a combination thereof. However, antisemitism is not simply a form of prejudice or hate. It is also a pernicious conspiracy theory that often features myths about Jewish power and control.

There are several definitions of antisemitism, which serve as valuable tools to raise awareness and increase understanding of antisemitism. The most prominent is the non-legally binding “working definition” of antisemitism adopted in 2016 by the 31-member states of the International Holocaust Remembrance Alliance (IHRA), which the United States has embraced. In addition, the Administration welcomes and appreciates the Nexus Document and notes other such efforts.

The focus of this national strategy is on actions to counter antisemitism.

Strategic Goal 1.1—Increase School-Based Education about Antisemitism, Including the Holocaust, and Jewish American Heritage

In 2020, the first 50-state survey on Holocaust knowledge among millennials and Gen Z found that most young Americans lack basic knowledge of the Holocaust. For example, 63% of survey respondents did not know that 6 million Jews were murdered in the Holocaust, nearly 60% did not know what the concentration camp Auschwitz was, and 11% believed that Jews caused the Holocaust.²⁵ We need Holocaust education in schools to correct this lack of knowledge and help ensure that future generations learn about antisemitism and the history of the Holocaust, including how and why it happened. Holocaust education should make clear that antisemitism was the basis of Hitler’s persecution of Jews.



Twenty-four states have Holocaust education mandates, and the majority of states also include Holocaust education as part of their state teaching standards.²⁶ By congressional mandate, states and localities set and implement these standards, but the federal government can play a supporting role. The federal government recently supported such education by enacting the *Never Again Education Act* that authorizes the United States Holocaust Memorial Museum (USHMM) to “develop and nationally disseminate accurate, relevant, and accessible resources to promote understanding about how and why the Holocaust happened.”²⁷ Such Holocaust education should include, for example, instruction on the roles of Nazi racial antisemitism, longstanding European antisemitism, conspiracy theories, and the propaganda during the Holocaust, not just the facts of *what* happened during the 1930s and 1940s that resulted in the systematic murder of European Jews. It should also include the experiences of Jews living in North Africa during the Holocaust.

Both antisemitism and Holocaust education specifically can also teach students about hate, bigotry, racism, and prejudice more broadly. When conducted effectively, Holocaust education provides enduring lessons for all communities and encourages students to think critically about their own roles and responsibilities to stand up against hate.²⁸ This education enables students to understand what can happen in a democratic society when hatred goes unchecked, when people are silent as their neighbors are marginalized and murdered. A compilation of efforts nationwide will help states and nongovernmental organizations improve and increase teaching about the Holocaust and antisemitism as well as other forms of hate, bigotry, and genocide.

In addition to learning about the horrors of the Holocaust, students should learn about global histories of antisemitism. This should include histories of antisemitism experienced by Sephardic and Mizrahi Jews—who trace their ancestry to Spain, the Middle East, and North Africa—and their stories of exclusion, persecution, and expulsion. Students should also learn about the history of antisemitism in the United States as well as contemporary manifestations of antisemitism. Educators need readily available quality resources to enable such education.

Additionally, more education on Jewish American history and the valuable role that Jews have played in our national story is needed. This focus on the positive contributions Jews have made will further help to inoculate young people against antisemitic stereotypes, tropes, and conspiracy theories.ⁱ

The Administration applauds the many states, cities, teachers, schools, education centers and museums, and supporting communities that have made great strides in increasing the quantity and quality of such educational efforts and encourages more progress in this area.

ⁱ *As the Department of Education has noted:*

Education is mainly a state and local responsibility in the United States. When the U.S. Department of Education was created, Congress made clear that the secretary of education and other department officials are prohibited from imposing “any direction, supervision, or control over the curriculum program of instruction, administration, or personnel of any educational institution, school, or school system.” (20 USC 3403). It is left to the states to create standards while states and local agencies develop curricula. For more, visit www.ed.gov/answers.



Executive Branch Actions

- In 2024, the **USHMM** will launch the first-ever U.S.-based Holocaust education research center. Once the new center is fully operational, it will undertake systematic, rigorous, and actionable research into teaching and learning about the Holocaust and study the impact and effectiveness of Holocaust education in the U.S. As part of this effort, the USHMM will conduct ongoing studies that will include state-by-state profiles of Holocaust education; identification of each state’s resources, activities, and support for educators; and evaluation of what methods teachers are using that advance critical thinking about how and why the Holocaust happened, the history of antisemitism, and its role in enabling the Holocaust. *(2024)*
- Additionally, the **USHMM** will:
 - Create educational resources and lesson plans to enhance understanding of antisemitism’s role in the Holocaust. *(By May 2024)*
 - Sponsor professional development trainings for educators to help them incorporate these resources and content into their curricula across various age levels, disciplines, course lengths, and learning styles. *(By May 2024)*
 - Launch efforts to significantly expand the number of teachers and students involved in Holocaust education and ensure that all 50 states and underserved communities are reached. *(By November 2023)*
 - Complete a two-year national tour of the *Americans and the Holocaust* exhibition to public and academic libraries in partnership with the American Library Association, as well as open applications for a second tour to fifty additional sites across the country. *(By September 2023)*
 - Convene **Department of Education (ED)** and state education officials to discuss best practices in Holocaust education, including the incorporation of education on antisemitism, and opportunities to expand such education. *(By May 2024)*
- **The Institute of Museum and Library Services (IMLS)** will partner with the Council of American Jewish Museums to host a summit for museums, libraries, and archives on countering antisemitism. The summit will focus on building cross-community solidarity, sharing model resources for educators on teaching about histories of antisemitism and Jewish American heritage, and developing a collection of materials and toolkits on countering antisemitism that can be used by community educators and organizations. *(By March 2024)*
- **The National Endowment for the Humanities (NEH)** will expand its investment in K-12 education on Jewish history through partnering with independent organizations and other federal agencies, such as the USHMM and the Smithsonian, to develop educational materials about Jewish history. Materials will include trainings and other resources for educators nationwide including content on antisemitism and Jewish



history on NEH's [EDSITEment website](#)—a widely used resource that provides teachers, students, and parents with free, high-quality K-12 humanities materials and lesson plans. *(By September 2023)*

- **ED** will award approximately \$19 million through the American History and Civics Education program. These grants will go to eligible applicants to promote innovative teaching, learning and professional development activities in American history, government, and civics. This program promotes new and existing evidence-based strategies to encourage innovative teaching on American history, civics and government, as well as professional development for teachers, principals, or other school leaders. *(By November 2023)*

Calls to Congress

- **We call on Congress to** fully fund the President's FY24 Budget request of \$73 million for the Department of Education's American History and Civics Education programs. History and civics education is designed to improve the quality of teaching and learning about American history, civics, and government education. The programs are, in part, to promote new and innovative evidence-based instruction and professional development for teachers, principals, or other school leaders. This request includes funding for a new \$50 million initiative to support evidence-based strategies that bring students from different communities together, enhance understanding of how government works, promote student engagement and empowerment, and help students develop digital and media literacy.

Whole-of-Society Calls to Action

- **We call on state and local governments to** strengthen education on hate-fueled violence and the impact of discrimination, including through teaching about Jewish history, antisemitism, and the Holocaust. State and local governments should create opportunities to educate youth about the Holocaust, especially how and why it happened, and to teach students to think critically about their own responsibilities to stand up against hate.
- **We call on state and local governments to** support and work with local and regional Holocaust education centers and museums that are educating students and teachers about the Holocaust and antisemitism.
- **We call on states to** consider creating a Governor's Council on Holocaust and Genocide Education. California launched such a council in 2021. The council identifies instructional resources for teaching about the Holocaust and other acts of genocide and provides young people with the tools necessary to recognize and respond to on-campus instances of antisemitism and bigotry. North Carolina has a similar council that provides teacher workshops and educational resources on the Holocaust, including material on Holocaust survivors who became North Carolina residents.



- **We call on states to** consider conducting studies to assess how effectively school districts are teaching the Holocaust. For example, in April 2023, New Jersey passed legislation requiring a state-wide survey on public school education relating to the Holocaust and genocide, as well as a final report with detailed recommendations for Holocaust education improvement.
- **We call on state and local governments to** include Jewish studies in ethnic studies and history curricula. Lessons should include Jewish history, as well as curricula on positive Jewish contributions to America, Jewish diversity, and manifestations of contemporary antisemitism.
- **We call on state and local governments to** consider using materials published by Jewish organizations to help students to identify antisemitic tropes, words, and symbols that often hide in plain sight, as well as learn about how biases can lead to acts of hate, discrimination, and violence.

Strategic Goal 1.2—Raise Awareness about Antisemitism and Jewish American Heritage Outside of the classroom, and Increase Workplace Training on Countering Antisemitism

Beyond formal educational settings, government and civil society must increase understanding and raise awareness about antisemitism, reaching Americans wherever they are. It is essential to engage people in their communities and through trusted networks and interlocutors to help them identify and learn about antisemitism. To educate the public about both antisemitism and Jewish American heritage, we need programming in museums, libraries, and arts and cultural institutions, as well as dedicated efforts by public figures, community leaders, and media outlets. Given their audiences, traditional and social media organizations have a special responsibility to provide credible and accurate information, and to educate the public about targeted hate and what drives it. Whenever possible, media outlets and content creators should ensure that materials about Jews address the religious denominational diversity and range of identities and experiences within the Jewish American community. In the workplace, through education and training on antisemitism and other forms of discrimination, managers and employees will be better equipped to recognize and respond to incidents of discrimination and harassment, and develop more inclusive and equitable workplaces.²⁹ Training on antisemitism can help employees specifically identify when a co-worker is exhibiting antisemitic beliefs and support employers in responding to antisemitic incidents at work.

Executive Branch Actions

- **Federal Agencies** will incorporate information about bias and discrimination related to religion, national origin, race, and ethnicity, including information about antisemitism and Islamophobia, and about workplace religious accommodations into training programs as they carry out their obligations under Executive Order 14035 (Executive Order on Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce).³⁰ *(By November 2023)*



- **The Office of Personnel Management (OPM), Equal Employment Opportunity Commission (EEOC), and White House Office of Management and Budget (OMB)** will conduct learning sessions for agency diversity, equity, inclusion, and accessibility (DEIA) officers on antisemitism and related forms of discrimination as well as workplace religious accommodations. *(By November 2023)*
- **The Department of Labor (DOL)** will develop and disseminate model resources such as palm cards for unions on how to recognize antisemitism and other forms of discrimination and how countering antisemitism and other discrimination relates to workers' rights. *(By September 2023)*
- **AmeriCorps** will distribute resources on antisemitism and countering antisemitism through its national service programs. *(By September 2023)*
- **The Department of Veterans Affairs (VA)** will develop educational programs that highlight the diversity of the veteran population, including the contributions of Jewish veterans and Jewish VA employees. VA will share these programs with local veteran groups across the country and encourage all veterans to speak out against antisemitic and other hate-based incidents and attacks. *(By September 2023)*
- **Federal agencies** will organize or participate in communications or events marking International Holocaust Remembrance Day (January 27) and Jewish American History Month. *(By May 2023)*
- **The National Endowment for the Arts (NEA)** will launch a campaign featuring artists who engage, unite, and heal communities through the arts, and who incorporate themes of countering antisemitism and other forms of hate in their artistic practice. *(By September 2023)*
- **The President's Committee on the Arts and Humanities** will help raise awareness and support efforts to educate the public about antisemitism and other forms of hate. To do so, it will leverage its platform, members' expertise, and new partnerships and coordination with the private sector and civil society. *(By September 2023)*
- **The Department of the Interior (DOI)** will highlight new resources on Jewish American contributions to American history and disseminate the content through the National Park Service (NPS) website and mobile app. DOI will also integrate Jewish American history and histories of American antisemitism into planning for the United States Semiquincentennial commemoration in 2026. *(By September 2023)*
- **IMLS** will increase learning opportunities in rural libraries and museums on both Jewish American history, such as Jewish contributions to agriculture, and histories of antisemitism, including the Holocaust. *(By March 2024)*
- **The Small Business Administration (SBA)** will connect small business owners with community-based organizations to provide training and resources for owners and employees on preventing and responding to incidents of antisemitism, Islamophobia, and other forms of hate. *(By September 2023)*



- **VA** will incorporate training on countering antisemitism, anti-Muslim bias, anti-Sikh bias, and related forms of bias and discrimination into its Community Clergy Training Program, which teaches VA chaplains how to respond to and connect with veterans. *(By September 2023)*
- **DOI** will train NPS employees, such as rangers and guides, to identify and counter antisemitism and other forms of hate. *(By November 2023)*
- **The Department of Agriculture (USDA)** will provide educational opportunities for law enforcement agents of the U.S. Forest Service to learn how to identify and counter antisemitic, Islamophobic, and related forms of discrimination. *(By September 2023)*

Calls to Congress

- **We call on members of Congress, individually and in bipartisan groups, to** continue to speak out about combating antisemitism, including through efforts to educate their constituents.

Whole-of-Society Calls to Action

- **We call on state and local leaders to** speak out about combating antisemitism, including through efforts to educate their constituents. They should also use International Holocaust Remembrance Day and Jewish American Heritage Month to raise awareness of antisemitism and Jewish American history. They should celebrate the positive contributions Jewish Americans have made to their communities and to our Nation.
- **We call on states and localities to** offer trainings to help people understand Jewish communities, antisemitism, and ways to counter antisemitism in their neighborhoods. For example, New York City has a training called, “Understanding Jewish Experiences and Antisemitism,” to develop cultural competence and understanding of the city’s diverse Jewish communities. (For further details, see Appendix A: New York City Training — “Understanding Jewish Experiences and Antisemitism.”) Such trainings can also focus on specific professions and partner with local museums or educational institutions. For example, the USHMM runs programs to teach law enforcement, military personnel, and judges about the central role these professions played in the Holocaust. These programs give law enforcement, military personnel, and judges the opportunity to learn about antisemitism and reflect on their own roles in a democratic society today. The Administration urges states and localities to adapt such trainings for their communities.
- **We call on employers—including states, cities, K-12 schools, institutions of higher education, private companies, and non-profits—to** review their own diversity, equity, inclusion, and accessibility (DEIA) programs to ensure full inclusion of antisemitism awareness and training as well as workplace religious accommodation requirements and best practices to prevent religious discrimination. For example, after a recent incident involving a local law enforcement officer who had a history of antisemitic remarks, the City of Cleveland began training officers within the Cleveland Division of Police in understanding Jewish experiences and recognizing antisemitism.



- **We call on employers to** leverage DEIA efforts to share information with employees about American Jewish heritage, culture, and history and provide resources on countering antisemitism. For example, employers can acknowledge Jewish holidays and other important days and events to the Jewish community, such as International Holocaust Remembrance Day or Jewish American Heritage Month, and invite Jewish employees to share their family stories and Jewish identities.
- **We call on DEIA professional associations to** ensure full inclusion of antisemitism awareness in DEIA trainings as well as religious accommodation requirements and best practices.
- **We call on employers to** develop and disseminate workshops on the intersection of antisemitism, racism, and xenophobia. Reciprocal learning about antisemitism and other forms of hate help identify how to counter such hate more effectively. Additionally unions should incorporate antisemitism into broader diversity and solidarity-building trainings.
- **We call on employers to** have a plan to address antisemitism specifically when Jews are attacked or face discrimination, such as a double standard because of their perceived power. Employers should respond quickly and firmly to any and all forms of antisemitic attack. Employers should know that antisemitism can manifest distinctively. Discrimination and double standards that impact the terms and conditions of employment are not only wrong, but also can expose employers to legal liability under federal, state, and local anti-discrimination laws.
- **We call on employers to** support Jewish employees by promoting employee resource groups, including for Jewish staff. Employers should work with these groups, especially in issuing both internal and external statements when instances of antisemitism arise.
- **We call on media to** use its reach to raise awareness of antisemitism while also ensuring users have credible and factual information about Jewish people, antisemitism, and the Holocaust. Media coverage can shape public perceptions, not just of antisemitism, but of Jews, Judaism, and American Jewish heritage, culture, and identity. This is both a significant opportunity and responsibility. Broadcast media outlets should ensure accurate and faithful representation of the Jewish community in all its diversity, and avoid stereotypical portrayals of Jews, including as mere victims of antisemitism. Media outlets should also hold people accountable for their antisemitic comments. In addition, media outlets should guard against visual displays of hate and be mindful to not amplify antisemitism while carrying out their responsibility to educate audiences.
- **We call on professional sports leagues, sports clubs, and associations to** use their powerful platforms to raise awareness about antisemitism, as they do with other social issues.
 - **We call on American sports leagues to** combat antisemitism and other forms of hate, discrimination, and bias in sports by:
 - Holding athletes and other personnel, sports franchises, and sports leagues themselves responsible for antisemitic acts and other acts of hate, discrimination, and bias committed during and outside of sporting events.



- Reminding athletes and coaches, team personnel, and staff to abstain from antisemitic behavior and other acts of hate, discrimination, and bias in all circumstances.
 - Encouraging fan clubs or organizations to adopt fan charters that contain anti-hate clauses.
 - Creating honors or awards for combating hate, and for promoting inclusivity, accountability, and respect as best practices in sport.
 - Inviting local business, community, and faith leaders to organize sport-related outreach activities, bringing together people from different backgrounds.
- **We call on American sports teams** to collaborate with nonprofit organizations and one another to create and share best practices for educating fans about Judaism, Jewish heritage, culture, and identity, and the Holocaust, and empowering them to combat antisemitism and all forms of hate.
- **We call on American leagues** to combat antisemitism by leveraging the social power of sports and the influence of professional athletes.
- **We call on American leagues** to consider commemorating Holocaust Remembrance Day, similar to how sports leagues observe Memorial Day and 9/11, and to recognize Jewish American History month.
- Youth sports are platforms that often introduce children and adolescents to the values of unity and fairness. **We call on youth sports organizations** to condemn antisemitism and all forms of hate, and educate young athletes, parents, coaches, and referees about their negative consequences on and off the field.
- **We call on state, local, and private cultural institutions** to highlight Jewish American heritage, culture, identity and history as well as histories of antisemitism in cultural festivals and institutions. **The Smithsonian** will highlight histories of American Jews and Judaism at the upcoming Summer 2023 Folklife Festival on the National Mall, in the program *Creative Encounters: Living Religions in the U.S.* The Smithsonian will continue to offer exhibitions, experiences, and resources that teach the heritage, histories, identities, and cultures of Jewish Americans, including episodes of antisemitism, and Judaism as a religion.
- **We call on creators such as writers, producers, and directors** to avoid stereotypical depictions of Jewish people and content that promotes misinformation about Judaism as a religion and Jewish culture, and to consider consulting organizations that have helped train media corporations, content creators, journalists, and reporters to identify antisemitic terms and tropes.
- **We call on influencers of all kinds—especially those in popular culture such as athletes, gamers, and entertainers—to** use their platforms to increase understanding and awareness of antisemitism. They should use important dates in the calendar to reach their followers, demonstrate allyship through public statements or social media messages, and use their platforms to lift up stories of people who have been victimized by antisemitism or are fighting against it. Experts on antisemitism and communications



should hold briefings for influencers and work with them individually to develop educational content, including content for social media.

Strategic Goal 1.3—Bolster Research on Antisemitism and its Impact on American Society, Including Its Intersection with Other Forms of Hate

There is inadequate research on antisemitism and methods to counter it. Building on ongoing and future research initiatives at the USHMM, the federal government will advance a research agenda on antisemitism and its impact on American society. This agenda will include new research on the history and sociology of antisemitism, its manifestations online, its intersections with other forms of hate, and best practices for prevention. Such scholarship can spur mutual understanding and support between the Jewish community and other communities targeted by hate. This research can also lead to vital programs and partnerships to counter antisemitism and other forms of hate.

Executive Branch Actions

- **NEH** will issue a special call for applications for research, teaching, and convening opportunities for humanities scholars and institutions to study the origins, history, and effects of antisemitism in the United States, including the spread of antisemitism online. *(By September 2023)*
- **The National Science Foundation (NSF)** will reach out to the scientific research community, through potential means such as issuing a Dear Colleague Letter (DCL), to encourage research and workshop proposals on the origins, causes, and effects of bias, intolerance, discrimination, and hate, including antisemitism. NSF will encourage diverse research on hate through developmental, cognitive, social psychological, and sociological approaches. *(By November 2023)*
- **The Department of Homeland Security’s (DHS) Directorate of Science and Technology** will work with other federal partners to support research on how antisemitism fuels violence across different violent extremist ideologies. *(By November 2023)*

Whole-of-Society Calls to Action

- **We call on academic and other research institutions to** deepen investments in multidisciplinary research on antisemitism, including scholarship that connects antisemitism with racism, misogyny, and other forms of hate.
- **We call on academic and other research institutions to** convene forums with community leaders, non-profits, and scholars to discuss antisemitism and its relationship to other forms of hate as well as best practices for countering antisemitism.
- **We call on academic and other research institutions to** create forums for Jewish and non-Jewish community leaders and K-12 teachers to partner with academics on educational resources that teach about antisemitism and other forms of hate.



Pillar 2: Improve Safety and Security for Jewish Communities

All Americans deserve to practice their faith and pursue their lives without the threat or fear of attack or harassment. Many Jews and Jewish communities do not enjoy that peace of mind.³¹ Security measures like guards and metal detectors have tragically become precautions that many Jewish institutions want and need at a scale never seen before in American history. Yet these measures can also serve as an ever-present reminder of the threat, further feeding the fear and anxiety of the Jewish communities they protect.

We need a more holistic approach to improve safety and security for Jewish and other communities—one that prevents violence against Jewish communities and results in accountability, deterrence, and an effective response. We will pursue an approach to security that protects vulnerable Jewish communities in the near term and reduces the threat in the future.

Strategic Goal 2.1—Improve Data Collection on Antisemitism

Data and evidence are the foundation for understanding a problem and addressing it. America cannot effectively counter antisemitism if we lack robust data on how antisemitism manifests online and in the physical world. While programs and funds in the Jabara-Heyer NO HATE Act, which President Biden signed into law in 2021, are improving official government collection of hate crime statistics, the reporting, collecting, and analyzing of data related to hate crimes have been uneven and incomplete. Furthermore, official crime statistics alone do not capture unreported bias crimes and non-criminal incidents of bias, discrimination, and harassment. Hate crime and incident surveys, data collection, and analysis from nongovernmental organizations provide additional information but still only a patchwork understanding of the problem.³² In close collaboration with state and local governments, civil society, online platforms, and affected communities, the Administration will continue working intensively to improve data collection, analysis, and reporting of hate crimes, as well as other incidents of hate and harassment online and in the physical world. These efforts are critical to ensuring that the public has a complete understanding of how hate harms Jewish and other communities, and to enabling actors across American society to fight antisemitism and other forms of hate.

Executive Branch Actions

- **The White House Office of Science and Technology Policy, with the Domestic Policy Council and National Security Council**, will launch an interagency effort to understand and eliminate the impediments to reporting hate incidents. This initiative will build on existing efforts to improve criminal justice data reporting and focus on the broader mechanisms that individuals use to communicate hate incidents and social marginalization. Developing a deeper understanding of the social, behavioral, and structural barriers to identifying hate incidents will empower the U.S. government to more accurately capture the frequency and scope of hate incidents and reduce these experiences through evidence-based policies and programs. *(By March 2024)*



- **The FBI** will continue to conduct outreach and provide technical assistance to law enforcement agencies that have not consistently reported hate crimes data through the National Incident-Based Reporting System (NIBRS), with particular attention to small agencies with the fewest resources for administrative management and data analysis. *(By November 2023)*
- **ED’s Office for Civil Rights (OCR)** will continue to collect data on allegations of harassment or bullying based on religion, as it has since the 2013-14 Civil Rights Data Collection (CRDC). This will include reported allegations of harassment or bullying based on 14 categories of religion, including Judaism. *(Ongoing)*
- **The Department of Defense (DOD)** will leverage existing survey data to estimate prevalence of antisemitic and Islamophobic behavior in the military workplace to evaluate its policies to counter discrimination, discriminatory harassment, and extremist activity. This analysis would be the first to specifically estimate antisemitic and Islamophobic activity in the military workplace to identify gaps to be addressed in future policies, programs, and procedures to prevent and respond to antisemitism and Islamophobia in the military. *(By November 2023)*
- **The General Services Administration (GSA)** will continue enabling Presidential Innovation Fellows’ (PIFs) work to improve data analytics, data collection, and data management in government. PIFs will continue to amplify executive agencies’ data-related efforts to counter hate, including addressing antisemitism and other forms of hate. *(Ongoing)*

Calls to Congress

- **We call on Congress to** fully fund the President’s FY24 budget request to fund DOJ grant programs including the COVID-19 Hate Crimes and Khalid Jabara-Heather Heyer NO HATE Acts, the Matthew Shepard and James Byrd, Jr. Hate Crime Program, and the Community-based Approaches to Prevent and Address Hate Crimes. These programs support state and local efforts to implement National Incident-Based Reporting System, create state-run hate crime reporting hotlines, train officers, and develop protocols for identifying, investigating, and reporting hate crimes. These programs also support community-based organizations and civil rights groups implementing comprehensive approaches to promote community awareness and preparedness, increase victim reporting, strengthen community resiliency, and improve response to hate crimes. The President’s FY24 Budget requests \$15 million for the COVID-19 Hate Crimes and Khalid Jabara-Heather Heyer NO HATE Acts, an increase of \$5 million over the 2023 enacted level.
- **We call on Congress to** require online platforms to gather data on all posts that violate the hate-speech prongs of their terms of service or community standards, analyze that data by sub-category of targeted group (including antisemitism), and report on this more granular analysis in regular transparency reports, so that the public and policymakers have a better understanding of trends and developments. Data collected by online platforms may provide the most complete and timely picture of antisemitism and other forms of hate in the country.



- **We call on Congress** to require platforms to provide credible, vetted researchers with access to their data and algorithmic recommendation systems, on the condition that researchers publicly publish research on hate online, including antisemitism, as well as its contribution to harassment and violence in the real world.

Whole-of-Society Calls to Action

- **We call on state and local officials** to convene community partners, including law enforcement, to discuss antisemitism and hate crimes, create a diverse network of community leaders, and encourage reporting of hate incidents. In Oklahoma City, for example, the mayor's office has worked with local community groups and national organizations to host town halls to discuss antisemitism and hate crimes. These efforts have encouraged local groups to coordinate more closely with law enforcement and those who track hate crimes. Oklahoma City has also leveraged the platform of the mayor's office to provide public moral support for the Jewish community and establish a firm community norm against antisemitism.
- **We call on local governments** to intensify efforts to improve hate crime reporting. Local governments should leverage Department of Justice (DOJ) resources, such as grants enable the establishment of state-run hate crime hotlines and DOJ materials to develop hate crimes bias training, so that communities feel comfortable reporting hate crimes. Elected leaders should ensure that all law enforcement agencies transition to the FBI's NIBRS to submit hate crimes data to the FBI for its annual report. Local officials should proactively engage targeted communities, including Jewish communities, to understand barriers to reporting and encourage greater reporting of hate crimes to local law enforcement.

Strategic Goal 2.2—Ensure Robust Engagement Between Law Enforcement, Government Leaders, Civil Rights Organizations, and the Communities They Serve to Combat Hate Crimes

Antisemitic hate crimes, like other hate crimes, are underreported to law enforcement.³³ As we work collectively to improve reporting of hate crimes, it is imperative that, once reported, law enforcement at every level swiftly investigates and, where appropriate, prosecutes hate crimes. Vigorous enforcement gives the public, especially targeted communities, the confidence that law enforcement is willing and able to address bias crimes. This Administration will continue to prioritize combating hate and discrimination in all forms, including hate crimes.

Greater confidence will, in turn, result in more reporting. Effective prevention of antisemitic incidents and vigorous enforcement of hate crimes laws also requires close and consistent coordination and dialogue among law enforcement, other government leaders, and targeted communities, including Jewish communities. We will continue to use all available mechanisms to ensure the voices of community leaders help guide our efforts to address hate crimes, such as the DOJ Uniting Against Hate Community Outreach Program and the DHS Faith-Based Security Advisory Council.



Executive Branch Actions

- **U.S. Attorney Offices, FBI Field Offices, DOJ Community Relations Service members and others** will undertake targeted engagement with community-based groups including youth, faith leaders, cultural leaders, and civil rights organizers from Jewish communities and other communities victimized by hate crimes. This engagement will open dialogue with communities, help to reduce the fear and isolation that can arise from hate crimes, promote a common understanding of each community's security situation and concerns, and enable the sharing of threat information, as appropriate. *(By September 2023)*
- **DHS** will conduct a series of regional and online workshops on countering antisemitism, Islamophobia, and related forms of hate-motivated violence, such as online misogyny and gender-based violence, and violence against LGBTQI+, AANHPI, or Black communities. These workshops will provide direct assistance and help DHS identify additional ways to assist the Jewish community and other communities that have been targeted with violence. *(By November 2023)*
- **DHS** will convene listening sessions nationwide to better understand evolving threats and the safety and security needs of communities impacted by targeted violence, with an emphasis on underserved communities. Such sessions will help improve accessibility and information-sharing of DHS' resources to meet the needs of those impacted by hate-motivated violence. *(By September 2023)*
- **DHS' Faith-Based Security Advisory Council**, a multi-faith council, will amplify resources and tools to protect Jewish and other communities nationwide. *(By November 2023)*
- **The Department of the Treasury (Treasury)** will continue to promote information to assist financial institutions to identify financial transactions of violent extremists, including those motivated to violence by antisemitism. This will include Treasury's recently launched Domestic Violent Extremism Landing Page, which provides information to help financial institutions better address how violent extremists raise, move, and use funds to facilitate their violent acts against Jews and others. *(Ongoing)*
- **SBA** will work through its district offices to encourage small businesses to report incidents of antisemitism and other incidents of hate at their businesses to the proper authorities, including local law enforcement and community organizations. *(By September 2023)*
- **DOJ** will update and refine its hate crimes website with links to hate crimes related programs and information from across the government with plain language and easily sortable descriptions of the resources. DOJ will also work to increase public awareness of hate crimes and hate crime reporting, including by promoting the hate crimes website. *(By November 2023)*



Calls to Congress

- **We call on Congress to** pass legislation to give DOJ enhanced tools to address the bias-motivated violence that is devastating communities across America. In particular, we call on Congress to make it a crime to conspire to commit hate crimes or to solicit the commission of a hate crime. Additional criminal prohibitions would better position the federal government to investigate, prosecute and report on hate crimes, including those targeting the Jewish and other impacted communities.

Whole-of-Society Calls to Action

The public is an important partner in ensuring that hate incidents and crimes are investigated and prosecuted. It is vital that members of the public report hate crimes to law enforcement.

- **We call on state and local law enforcement to** work closely with Jewish communities in their jurisdictions to ensure Jews feel safe reporting antisemitic hate incidents and crimes. While today 63% of American Jews believe law enforcement is effective in responding to the Jewish community's needs, that number is a sharp drop from 81% in 2019.³⁴ To help ensure community needs are being met, law enforcement agencies should appoint an appropriate senior official to be a central point of contact for local Jewish communities when a security need arises.

We call on law enforcement and local jurisdictions to report all hate crimes. Dozens of cities with populations greater than 100,000 reported zero or did not report hate crimes to NIBRS in 2021, according to the FBI.³⁵ Simply put, they need to do better. Local, state, Tribal, and federal law enforcement agencies should voluntarily submit hate crimes data to the FBI under the 1990 Hate Crimes Statistics Act.

- **We call on law enforcement agencies nationwide to** use NIBRS to collect and share more accurate data with the FBI. Law enforcement should take advantage of increased DOJ resources—bolstered by the COVID-19 Hate Crimes and Khalid Jabara-Heather Heyer NO HATE Acts—to transition to using NIBRS to report all crime data, including hate crime data. Agencies should also leverage the Matthew Shepard and James Byrd, Jr. Hate Crime Program, which supports training, investigation, and prosecution of hate crimes, assistance to victims, and public outreach, for hate crimes bias training and establishing hate crimes hotlines.
- **We call on local and community leaders, law enforcement, and Jewish communities to** collaborate on efforts to improve hate incident reporting, increase trust, and raise awareness about what constitutes a hate crime.
- **We call on state and local law enforcement to** prosecute hate crimes consistently. State and local law enforcement should take advantage of existing DOJ resources to help recognize, investigate, and prosecute hate crimes. In particular, last year, DOJ released a new hate crimes recognition and reporting training aimed specifically at line-level officers, which can be requested by a local agency at no cost. In addition, this fiscal year, DOJ can award close to \$30 million in grants to support state and local agencies in investigating and prosecuting hate crimes, in addition to grants to improve reporting. Perpetrators of antisemitic hate crimes must be held accountable.



- **We call on state and local law enforcement** to work with local government and community partners to pursue alternative approaches such as restorative justice programs for addressing hate crimes, including antisemitic hate crimes. Restorative justice practices can include community-wide conversations about a crime or conflict in order to teach and create constructive engagement.

Strategic Goal 2.3—Enhance the Physical Security of Jewish and Other Religious Communities and Institutions

Tragically, FBI hate crime data shows that attacks on synagogues, mosques, churches, gurdwaras, temples, and other religious institutions in the United States have been increasing. Assailants have taken precious lives, wounded congregants, and terrorized religious communities. Religious institutions have been burnt to the ground, firebombed, subject to bomb threats, and defaced with swastikas and other hateful graffiti. Sacred objects have been stolen or vandalized. For the past decade, funding assistance from federal, state, and local governments has provided crucial support for safeguarding our religious institutions across the country, particularly in response to violent extremists' continuous targeting of houses of worship and religious gathering places. The ongoing threat to targeted communities, including the Jewish community, demands the continued expansion of security assistance to impacted institutions—not only from the federal government, but also from state and local governments and civil society. The Administration will continue to seek robust funding and provide assistance to local actors to help protect Jewish and other vulnerable communities from harm.

Executive Branch Actions

- **The Federal Emergency Management Administration (FEMA)** will make Nonprofit Security Grant Program (NSGP) funds easier to access for interested nonprofits. This includes enhanced training, new technical assistance, and engagements with rural and underserved communities to ensure they are aware of the purpose and requirements for this grant program. *(By November 2023)*
- **DHS** will, within its existing authorities, continue to take steps to improve access to publicly available resources to historically underserved community applicants of the NSGP, to increase equity in the application process. For example, DHS will approach Jewish communities that have not applied for NSGP funding to ensure they understand the benefits of the NSGP and the process for applying for such funding. DHS will partner with other departments and agencies with resources and authorities to provide such assistance, ensuring those agencies receive adequate information on DHS training and resources. *(By March 2024)*
- **AmeriCorps and DHS** will partner to amplify resources that support underserved communities and under-resourced organizations, including Jewish schools and synagogues that fit these criteria. *(By November 2023)*



- **The Cybersecurity and Infrastructure Security Agency (CISA) at DHS** will expand outreach and security capacity-building services to historically targeted communities, such as houses of worship, community centers, and private parochial schools, including Jewish day schools. These services include risk assessments, planning assistance, and active shooter and bomb prevention-related training. *(By September 2023)*
- **DHS and DOJ** will publish a fact sheet titled *Protecting Places of Worship: Six Steps to Enhance Security Against Targeted Violence* that outlines actions Jewish and other faith-based organizations and houses of worship can take to increase security through easily implementable steps that sustain an open and welcoming environment. *(By May 2023)*
- **The DHS Center for Faith-Based and Neighborhood Partnerships** will institutionalize its new Protecting Places of Worship Week of Action each September as part of National Preparedness Month and a Protecting Places of Worship Network that encourages peer-to-peer learning about steps organizations and communities can take to promote security and participate in activities like the NSGP. *(By September 2023)*

Calls to Congress

- **We call on Congress to** fully fund the President’s FY24 budget request of \$360 million for the DHS’ NSGP. These funds are vital to offset the costs of physical security enhancements for Jewish and other communities across the country.
- **We call on Congress to** continue to build upon improvements made to the NSGP in the FY23 National Defense Authorization Act. These additional changes would help strengthen the program’s effectiveness.

Whole-of-Society Calls to Action

- **We call on community-based violence prevention programs and local law enforcement to** build stronger ties with synagogues, Jewish community centers, Jewish day schools, and other Jewish institutions and organizations—and vice versa. Through these relationships, Jewish communities can avail themselves of federal training, technical assistance, and resources to bolster their security. Federal resources only reach as far as local actors’ ability to utilize them.
- **We call on mayors, governors, and municipal leaders to** establish a liaison to serve as a central coordinator for Jewish and other faith communities, especially as security needs arise. Many elected leaders have advisory groups or task forces that include faith leaders.

Strategic Goal 2.4—Improve Threat Information-sharing Between Law Enforcement and Online Platforms

Antisemitic and other hate crimes often start online. Violent extremists use online platforms to encourage and support violence against Jewish targets. Antisemitic conspiracy theories proliferate online, often linked to white supremacy and other forms of hate. The content often portrays Jews as collectively responsible for society’s ills and problems and, moreover, utilizes



memes and graphic imagery to reach a range of audiences that include young people.³⁶ Several non-profit organizations systematically monitor hate speech, including antisemitic content, on various online platforms. Greater information-sharing between law enforcement, expert non-profits, and online platforms would strengthen their collective ability to help prevent antisemitic harassment and attacks and ensure accountability for those who perpetrate them.

Executive Branch Actions

- **Federal law enforcement agencies** will assess their own nondiscrimination policies and encourage increased information-sharing. This includes between federal, state, Tribal, campus, school, and local government entities, and from the federal government to technology companies through more specialized analysis and production of educational materials, as well as more robust engagement with technology companies. Specifically, the National Counterterrorism Center (NCTC), DHS, and FBI will, consistent with their authorities, engage with online platforms to ensure the agencies are sharing their latest information on threats of violence. *(Ongoing)*
- **FBI and NCTC** will conduct an annual threat assessment on antisemitic drivers of transnational violent extremism. Antisemitism is a common threat stream across several different violent extremist ideologies, as evidenced in the classified assessment that FBI and NCTC completed in March 2023 to help shape this strategy. FBI and NCTC will release a declassified version of the threat assessment in conjunction with this strategy. Moving forward, these agencies will produce an annual declassified assessment that can be shared with technology companies and other nongovernmental partners. *(By March 2024)*
- **The Department of Commerce (Commerce)** will provide Congress with a report on the role of telecommunications in the commission of hate crimes. The report will discuss and analyze hate crimes motivated by antisemitism and other antisemitic conduct, including the use of social media to engage in antisemitic harassment. *(By December 2023)*

Whole-of-Society Calls to Action

- **We call on civil society organizations with expertise in antisemitism** to share their information on and analysis of antisemitic content online with federal, state and local law enforcement as well as with online platforms to better enable these actors to hold accountable those who create and spread antisemitism online, engage in antisemitic threats and harassment, and encourage hate crimes and hate-fueled violence.

Strategic Goal 2.5—Expand Community-Based Prevention Efforts

Improving physical security at institutions is a necessary step, but threatened communities cannot rely only on physical security. We must join our communities to expand efforts to reach and guide individuals off the pathway to antisemitic violence. Expanding community-based prevention efforts can help reduce the number of bias crimes and violent acts by connecting individuals to counseling, social services, and other supports to steer them away from hate and



conspiracy-fueled violence. To that end, the Administration will continue to invest in community-based violence prevention programs.

Executive Branch Actions

- **The NSC** will work to strengthen community-based violence prevention efforts. The NSC will explore ways to expand the use of financial, technical, and training assistance offered to state and local partners to prevent violence motivated by ideologies of hate and bias. Examples of such resources include the DHS Targeted Violence and Terrorism Prevention grant program and the Center for Prevention Programs and Partnerships (CP3) Regional Prevention Coordinator program. Mindful that previous prevention programs created trust deficits with key communities, DHS and other agencies have significantly increased engagement with faith-based, civil rights, and community organizations and leaders to address concerns and to ensure transparency and accessibility. For example, DHS has tasked the Faith-Based Security Advisory Council to explore ways to build trust, to ensure accessibility, and to improve partnerships. *(Ongoing)*
- **DOJ** will pilot a curriculum for middle and high school-age youth, designed to prevent youth hate crimes and identity-based bullying. The curriculum will provide an interactive learning process that educates young people about bias, prejudice, and hate, and provides them with the information, skills, and motivation to be active participants in combating prejudice and hate in their schools and communities, online and offline. *(By November 2023)*
- **NCTC, DHS, and FBI** will continue to publish resource guides and other technical assistance through the Joint Counterterrorism Assessment Team, including products specific to antisemitic violent extremism and continued enhancements to the First Responder Toolkit. *(Ongoing)*

Whole-of-Society Calls to Action

- **We call on private and philanthropic sectors to** invest further in community-based prevention programs to address violent extremist radicalization and recruitment, including those motivated by antisemitism. Community-based violence intervention programs typically identify community members who are at higher risk of radicalization and work to reduce extremist radicalization through targeted intervention. Examples include programs and initiatives that build a sense of community belonging (such as local volunteering opportunities and multicultural programming), strengthen digital literacy, teach skills for forming healthy relationships, expand opportunities that enable community members to detect the signs of radicalization to violent extremism, and develop cooperation among community, law enforcement, and social service organizations.
- **We call on local nongovernmental actors to** work with state and local leaders and vice versa to design and implement community-based prevention programs. New York, Hawaii, Colorado, and numerous other states have crafted statewide targeted violence



and terrorism prevention strategies that rely on multidisciplinary approaches involving civic organizations, health professionals, and others.³⁷ We need more engagement from all segments of society to bring such programs to fruition. Local actors can learn more from the Prevention Resource Finder at www.dhs.gov/prevention or by contacting their state or local government leaders.

Strategic Goal 2.6—Strengthen Support for Victims of Antisemitic Harassment and Attacks

Victims of hate crimes deserve swift, certain, and sustained support to address their needs and trauma in the aftermath of hate-fueled violence and harassment. We will continue to build more comprehensive approaches to rally federal support to Jewish and other targeted communities overwhelmed by hate crimes and violence. The Administration will also continue to build state and local capacity to support victims of hate crimes, including through mental health services. We will also work with state and local authorities, civil society, and the private sector to mobilize supports to assist communities that have suffered antisemitic attacks and harassment.

Executive Branch Actions

- In Executive Order 14092 (Reducing Gun Violence and Making Our Communities Safer), **the President directed** members of his Cabinet to develop a proposal by September 15, 2023, for the federal government to better support communities after a mass shooting and identify what additional resources or authorities the executive branch would need from Congress to implement this proposal.³⁸ *(By September 2023)*
- **The Administration will** continue to bolster efforts to improve services provided to people and communities that experience hate incidents or discrimination, including antisemitic incidents and discrimination. To this end, departments and agencies will look to use existing funding and programs to expand the capacity of community-based organizations that are implementing projects to support communities and people who have been the victims of hate incidents or discrimination. These projects include efforts to promote awareness, healing, reconciliation, services and federal benefits access, and/or resource development. Additional objectives that funding or guidance will address include:
 - Cultural competence among those serving people who have experienced hate incidents or discrimination;
 - Awareness and training on culturally-specific and trauma-informed remedies to help people who have experienced hate incidents or discrimination recover from trauma, and options to support victims who seek education and reconciliation with perpetrators in lieu of punitive options; and
 - Economic supports as survivors recover from trauma. *(Ongoing)*



- **The Department of Health and Human Services' (HHS) Substance Abuse and Mental Health Services Administration's (SAMHSA) National Child Traumatic Stress Network** will continue to provide resources on how to talk with children and youth about hate crimes and identity-based violence. This includes guidance on talking with children about the painful consequences of antisemitism and other forms of hate, as well as strategies for coping with the associated trauma and fear. *(Ongoing)*
- **HHS' Administration for Community Living (ACL)** will continue to support Holocaust survivors by helping to ensure they receive person-centered trauma informed care. Since 2015, ACL and the Center on Holocaust Survivor Care have served over 43,700 Holocaust survivors and trained more than 7,300 of their family caregivers. These efforts help provide Holocaust survivors with the care they need.³⁹ *(Ongoing)*

Whole-of-Society Calls to Action

- **We call on state and local governments** to strengthen social services to support survivors of hate crimes and their communities. These may include victim compensation programs, victim advocate programs, culturally competent mental health services, and solidarity building initiatives such as restorative justice programs.
- **We call on local companies and businesses** to provide support and assistance to local communities that are victims of hate-fueled violence.

Strategic Goal 2.7—Address Foreign Support for Antisemitism in the U.S.

Rising antisemitism around the world contributes to antisemitic speech, acts, and violence in the U.S.—and vice versa. The Department of State, and the Office of the Special Envoy to Monitor and Combat Antisemitism (SEAS) in particular, play a critical role in coordinating international efforts to counter antisemitism globally, and the Administration will continue to provide robust support to this office. Yet, it is clear that antisemitism and violent extremists abroad provide material, ideological, or financial support for antisemitic movements in the United States. The Administration will intensify efforts to reduce foreign support and the transnational links that help fuel antisemitism in the United States. At the same time, the United States will continue to learn from, work with, and support the efforts of our allies and multilateral institutions that are implementing their own robust strategies to address antisemitism, or taking other actions to address antisemitism.

Executive Branch Actions

- **State and SEAS** will produce a report documenting promising overseas programs, policies, and actions that counter antisemitism including those that focus on law enforcement and hate crime prosecutions, multi-faith and intercommunal coalition-building, combating online hate, and antisemitism education. *(By September 2023)*

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- **The NSC** will review federal agencies' authorities and capabilities to target transnational networks seeking to foster antisemitism in the U.S. and elsewhere, and work with Congress to ensure sufficient funding and authorities for this work. *(By September 2023)*
- **Treasury and State**, working with industry-convening organizations such as the Global Internet Forum to Counter Terrorism, will convene a forum to engage Money Services Businesses (MSB), non-MSB financial institutions, and crowdfunding websites on preventing hate groups from raising money through crowdfunding websites. This will include foreign partners that are addressing the same threat. *(By November 2023)*



Pillar 3: Reverse the Normalization of Antisemitism and Counter Antisemitic Discrimination

America's constitutional protections for robust free speech and tradition of free expression are a foundation of our democracy. While free speech allows for a vibrant public square, it also means that hateful, disgraceful, and even some threatening speech—including antisemitic speech—is constitutionally protected.

Alarming,ly, antisemitism has been increasingly normalized in the public sphere. A majority of American Jews (69%) and the general U.S. adult population (82%) noticed antisemitism online in 2022, according to a survey from the American Jewish Committee.⁴⁰ These views are far too often legitimized by public figures—making this language feel more acceptable for others in their daily lives and giving comfort to those who seek to engage in antisemitic acts, including violence. The result is a climate of intimidation, anxiety, and genuine fear for Jewish communities across America, especially those who wear clothing or other items that visually identify them as Jewish. This is unacceptable. This Administration is committed to reversing the tide of normalized antisemitism by mobilizing a diverse and broad chorus of stakeholders to speak out and act against antisemitism at the national and local levels.

Strategic Goal 3.1—Speak Out Forcefully Against Antisemitic Speech and Conduct, and Increase Accountability for Antisemitism

America must beat back and overwhelm hateful and antisemitic speech with a powerful chorus that rejects it, especially when it is spread by public figures. America will not be silent. As Rabbi Abraham Joshua Heschel wrote, “indifference to evil is worse than evil itself... in a free society, some are guilty, but all are responsible.”⁴¹

We must all say clearly and forcefully: Antisemitism and all forms of hate and violence can have no safe harbor in America. The Biden-Harris Administration will continue to lead in calling out antisemitism and urges actors across society—from Congress to Statehouses and City Halls, from professional athletes and artists to CEOs and community leaders, from the pulpit to the university—to call out and condemn antisemitism unambiguously and unequivocally.

Additionally, antisemitism has become increasingly normalized in part because, far too often, there is not sufficient accountability for antisemitic speech and conduct—and, therefore, little deterrence to antisemitic expression and acts. To roll back the normalization of antisemitism, however, there should be meaningful accountability for antisemitic conduct, both online and in person, including vigorous and timely enforcement of existing laws and standards.



Executive Branch Actions

- **The Biden-Harris Administration** will continue to speak out clearly and forcefully against antisemitism and those who peddle it. There is no higher profile platform than the White House for pushing back against, rejecting, and re-stigmatizing antisemitism. The President and other federal leaders will continue to respond to prominent antisemitic acts and voices and use every appropriate opportunity to reaffirm the Administration's profound commitment to countering antisemitism. We strongly urge others to do the same. (*Ongoing*)

Calls to Congress

- **We call on members of Congress** to continue to speak out against, stigmatize, and condemn prominent individuals and groups, including elected officials, who embrace and perpetuate antisemitism.

Whole-of-Society Calls to Action

- **We call on elected leaders at all levels** to speak out against antisemitism. These leaders are close to affected communities, and their personal engagement with affected communities, both in response to and in advance of antisemitic incidents, is vital to building trust with those communities and demonstrating solidarity. It is particularly important for elected leaders to speak out when others who hold public offices engage in antisemitic speech and conduct.
- **We call on elected leaders at all levels** to recognize and celebrate those in their communities who speak out against antisemitism.
- **We call on national influencers, including media figures, athletes, gamers, entertainers, and other public figures,** to use their platforms to speak out against antisemitism and other forms of hate whenever they manifest.
- **We call on American CEOs and business leaders** to speak out loudly and clearly against antisemitic speech and conduct, especially when it occurs in communities where their businesses are based. American brands and CEOs have great influence, and failure to speak out only contributes to the normalization of antisemitism. Targeted communities must know that American businesses stand with them and against antisemitism.
- **We call on local businesses, community, civil society, and other leaders** to speak out when antisemitism and other forms of hate occur in their communities. Whether the incident is a swastika in a school, antisemitic leafletting of a neighborhood, or online harassment of a community member, community and civil society leaders must identify these incidents as antisemitic and strongly condemn them. Such local leadership is critical to uniting a community against antisemitism and marginalizing those who engage in antisemitic speech and conduct.



- **We call on all actors in American society, whether those operating at the global, national, regional or local level, to** review their association with and potential sponsorship or remuneration of individuals and entities that advance antisemitism. This might include reconsideration of a brand association, halting patronage of an antisemitic entity or individual, or “unfollowing” an account.

Strategic Goal 3.2—Tackle Antisemitism Online

Antisemitism is becoming increasingly normalized in part because our contemporary information ecosystem connects fringe views online to mass media and amplifies sensational, hateful and divisive content. This information ecosystem has helped bring antisemitism from the shadows into the mainstream of society. Antisemitic comments, tropes, and conspiracies are rampant on social media platforms, and there is too little accountability for those who peddle and amplify them. Some platforms lack terms of service or community standards that meaningfully address hate speech that can lead to violence. Many more do not enforce their own terms of service and community standards with the vigor and investment necessary to effectively tackle this problem. Moreover, platforms are failing to provide sufficient transparency and access to data to allow the public and researchers to understand how and why content moderation decisions are made, their potential effects on users, and the very real dangers they may pose.

Executive Branch Action

- **Commerce** will identify ways in which companies’ practices with respect to collecting, storing, using, and processing data can potentially drive antisemitism or lead to privacy harms that disproportionately impact Jews and other communities. This analysis will be included in a larger Commerce report, which will also identify policy recommendations to mitigate these harms against Jews and other historically marginalized communities. *(By November 2023)*

Calls to Congress

- **We call on Congress to** hold social media platforms accountable for spreading hate-fueled violence, including antisemitism. The President has long called for fundamental reforms to Section 230 of the Communications Decency Act, and Congress should remove special immunity for online platforms. This should include removing immunity if an online platform utilizes an algorithm or other computational process to amplify or recommend content to a user that promotes violence, or is directly relevant to a claim involving interference with civil rights or neglect to prevent interference with civil rights.
- **We call on Congress to** impose much stronger transparency requirements on online platforms, including their algorithmic recommendation systems, content moderation decisions, and enforcement of community standards.
- **We call on Congress to** pass legislation requiring platforms to enable timely and robust public interest research, including on the spread of antisemitism and other forms of hate, using platforms’ data and analyzing their algorithmic recommendation systems, while maintaining users’ privacy.



Whole-of-Society Calls to Action

- **To counter hate and antisemitism, the Biden-Harris Administration encourages all online platforms to independently commit to the following actions:**
 - Ensure terms of service and community standards explicitly cover antisemitism. The Administration commends platforms with terms of service and community standards that establish “zero-tolerance” for hate speech, including antisemitism. All online platforms are encouraged to adopt zero-tolerance terms of service and community standards.
 - Permanently ban repeat offenders, both personal accounts and extremist websites.
 - Invest in the human and technical resources necessary to enable vigorous and timely enforcement of their terms of service and community standards. Currently, many platforms do not adequately invest in enforcement of their terms of service and community standards, and numerous platforms have recently shed significant portions of their trust and safety workforces, leading to documented increases in hate speech on their platforms.⁴²
 - Improve capabilities to stop recommending and de-rank antisemitic and other hateful content. Extensive research has shown that online platforms’ algorithmic recommendation and ranking systems—depending on the incentives driving them—can amplify and spread extremist and antisemitic content.
 - Increase the transparency of their algorithmic recommendation systems and data, and allow for public interest research to ascertain how these systems amplify and spread hate speech and antisemitic content to inform better content moderation tools and approaches. Antisemitism should be treated as a distinct category in transparency reports, and platforms should report on the volume of antisemitic content adjudicated on platforms.
 - Encourage and support trusted community moderators who receive dedicated, ongoing training in hate speech and bias, including antisemitism and its tropes.
 - Use their reach to raise awareness of antisemitism while also ensuring users have credible and factual information about Jewish people, antisemitism, and the Holocaust.
 - Engage frequently with civil society groups that actively monitor antisemitism in media and online to stay abreast of the latest developments.
 - Listen to the concerns of Jewish communities around the world to understand how Jewish users experience antisemitism and hate on their platforms and ensure antisemitism is understood, recognized, and properly addressed.
 - Establish relationships with Jewish community organizations to share best practices related to reporting hate speech and utilizing platforms to lift up Jewish stories.



Strategic Goal 3.3—Increase Information, Digital, and Media Literacy and Civics Education to Prevent and Slow the Spread of Online Antisemitism

Online antisemitism is rampant and can be difficult for members of the public to identify. Advances in artificial intelligence will likely make this problem much worse. As conspiracy theories take an ever-growing hold on social media, robust education on the importance of critical thinking and interrogation of sources for biased and false information is critical. One of the best antidotes to these trends is information, digital and media literacy. Numerous studies have shown the benefits of providing consumers with tips for establishing the veracity of sources of information online, such as checking the source of information and validating the author.⁴³ Developing these skills can help Americans resist, counter, and challenge antisemitic conspiracies and stereotypes circulating online.

Civics education is another critical tool to prevent the spread of hate online, and it is vital to strengthening American democracy. Civics education enhances students' understanding of how government works, promotes student engagement and empowerment, brings students from different communities together, and helps students develop critical thinking skills.

Executive Branch Actions

- **Commerce** will open up applications for digital equity projects that promote digital inclusion, including awareness of online safety and the prevention of online harassment and abuse. In 2024, these digital equity projects will, for the first time, be eligible for Commerce's State Digital Equity Capacity Grants Program. This action was also highlighted in the Initial Blueprint of the White House Task Force to Address Online Harassment and Abuse. *(By May 2024)*
- **IMLS** will ensure the Federal Information Literacy Taskforce creates toolkits to help Americans understand, evaluate, and discern the reliability and accuracy of information. *(By November 2023)*

Calls to Congress

- **We call on Congress to** fully fund the President's FY24 Budget request for ED's new \$50 million investment to support Civics Participatory Learning and Engagement Grants. The grants would develop new, and expand existing, evidence-based, hands-on learning programs that help students develop digital and media literacy, among other skills.

Whole-of-Society Calls to Action

- **We call on states, cities, and school districts to** expand information, digital, and media literacy education to address online misinformation and disinformation, including related to antisemitism.
- **We call on libraries and non-profit organizations to** develop resources and programming on information, digital, and media literacy to address online misinformation and disinformation, including related to antisemitism.



- **We call on academics and experts** to research and evaluate promising practices to determine what information, digital, and media literacy strategies effectively help individuals identify online antisemitism and reduce further sharing and spread.

Strategic Goal 3.4—Address Antisemitism in K-12 Schools and on College Campuses

Reports of antisemitic incidents have increased dramatically in many educational settings over the past several years.⁴⁴ This is unacceptable. Nearly one-third of Jewish students report personally experiencing antisemitism directed at them on the campus of an institution of higher education or by a member of the campus community, according to a 2021 study.⁴⁵ A 2022 survey found that over 50% of Jewish students worry that people make unfair judgments about them because they are Jewish, and that over 50% of Jewish students feel they pay a social cost if they support the existence of Israel as a Jewish state.⁴⁶ Swastikas and other antisemitic graffiti have been reported on numerous college campuses.

On college campuses, Jewish students, educators, and administrators have been derided, ostracized, and sometimes discriminated against because of their actual or perceived views on Israel. All students, educators, and administrators should feel safe and free from violence, harassment and intimidation on their campuses. Far too many do not have this sense of security because of their actual or perceived views on Israel. For example, a teaching assistant at the University of Vermont allegedly posted on social media about not giving Jewish students course participation credit; subtracted points for Jewish students, including because “I hate ur vibe in general”; added the word, “Kristallnacht,” above a picture of a damaged storefront with accompanying Hebrew text; and celebrated the theft of an Israeli flag from a Jewish student’s residence.⁴⁷

Antisemitic expression and acts have also become common at many public and private secondary and elementary schools. For example, in fall 2022 antisemitic language and swastikas were found on tables and bathroom stalls in public schools in Livingston, New Jersey.⁴⁸ Similarly, the Montgomery County, Maryland, school district witnessed a series of antisemitic incidents, including graffiti and bullying, in early 2023.⁴⁹ Recent data showed a nearly 50% increase in antisemitic incidents at K-12 schools.⁵⁰

Our schools and campuses must feel and be safe for all people. The Department of Education’s Office for Civil Rights (OCR) continues to enforce civil rights laws prohibiting discrimination, including discrimination based on national origin or shared ancestry. For example, it recently resolved investigations involving alleged failure to respond to antisemitic harassment in Vermont at the University of Vermont and State Agricultural College, and in Arizona in both the Kyrene School District #28 and Peoria Unified School District.⁵¹ Everyone has a right to learn an environment free from antisemitic harassment. ED OCR will be watching to be sure these students are safe.



Executive Branch Actions

- **ED** will launch an **Antisemitism Awareness Campaign**, aimed at raising awareness among educators, students, parents, and communities about the alarming rise of antisemitism and giving them tools to address it. The campaign will launch in May 2023 and gain momentum in fall 2023 as students across America go back to schools and campuses. The campaign will include the following actions:
 - **ED OCR** will issue a Dear Colleague Letter (DCL), reminding schools of their legal obligation under Title VI of the Civil Rights Act of 1964 to address complaints of discrimination, including harassment based on race, color, or national origin, including shared ancestry, such as Jewish ancestry, and ethnic characteristics. OCR will continue to enforce federal civil rights laws, including Title VI. *(By May 2023)*
 - **ED OCR** will continue to offer technical assistance to school communities as well as community organizations regarding Title VI, including its application to Jewish students and its coverage of certain forms of antisemitic discrimination, as well as how to contact OCR for assistance or to file a discrimination complaint. *(Ongoing)*
 - **Senior ED officials** will conduct site visits to PreK-12 schools and institutions of higher education that are engaging in their own campaigns to address antisemitism as well as those that have experienced upticks in antisemitism but have not yet adequately addressed such concerns. During these visits, ED will engage influencers, including other federal or state and local partners, to join and help amplify resources such as best practices in countering antisemitism, guides for parents in talking about antisemitism with their children, and toolkits for educators and administrators on countering antisemitism. *(By November 2023)*
 - **ED** will spotlight notable efforts by students, communities, educators, and administrators to prevent and address antisemitism. ED will disseminate information about these efforts to offer concrete examples of ways schools and campuses can engage in efforts to prevent and address antisemitism. *(By November 2023)*
 - **ED** will raise awareness about ED resources that can be utilized to prevent and address antisemitism, such as funding from the Bipartisan Safer Communities Act and resources available through ED's technical assistance centers. ED will also, where appropriate, disseminate information about other federal agencies' resources and events that may be applicable to school and campus communities. *(By November 2023)*
 - **ED's Center for Faith-Based and Neighborhood Partnerships** will spotlight strategies for school and campus communities to be more inclusive of Jewish and other religious identities, such as multi-faith student groups, afterschool programs, or school-based efforts aimed at fostering cross-community cooperation. *(By November 2023)*



- **ED** will promote technical assistance opportunities to help school and campus communities improve awareness of religious cultures and practices and accommodation of religious observances, including Jewish observances, such as observance of the Jewish Sabbath, major Jewish holidays, and dietary requirements. *(By September 2023)*
- **USDA** will convene rural institutions of higher education and land-grant colleges to share promising practices to address antisemitism and other forms of hate and bias. *(By March 2024)*
- **USDA** will work with subject matter experts to develop and disseminate materials for rural universities on how to address specific incidents of antisemitism; create educational opportunities on Judaism, Jewish culture and identity, and histories of antisemitism, including the Holocaust, for students, faculty and staff; and ensure that university calendars are inclusive and accommodation policies are made known to faculty and students alike. *(By November 2023)*
- **USDA** will provide educational opportunities for 4-H, FFA, and other rural youth organizations to learn how to identify and counter antisemitism and related forms of discrimination. *(By March 2024)*

Calls to Congress

- **We call on Congress to** fully fund the President's FY24 Budget request of \$177.6 million for ED OCR. This is a \$37.6 million increase from the 2023 enacted level of \$140 million. The additional requested funds would strengthen OCR's work to counter antisemitism and related forms of discrimination in K-12 schools and on campus.

Whole-of-Society Calls to Action

- **We call on schools and colleges to** issue clear and unwavering statements condemning all forms of hate, including antisemitism, especially in the wake of antisemitic incidents.
- **We call on schools and colleges to** have a clear and transparent mechanism for students to report hate incidents and acts of antisemitism. Schools and colleges should also be transparent about the measures taken in response to such reports. This should include resources for students who have been the victims of intimidation, undue harassment, or violence on the basis of being Jewish or perceived as Jewish.
- **We call on schools and colleges to** treat antisemitism with the same seriousness as other forms of hate.
- **We call on schools and colleges to** create committees or task forces to combat hate on campus, including antisemitism, composed of administrators, faculty, and students from diverse ethnic and religious beliefs and backgrounds.
- **We call on schools and colleges to** ensure that Jewish students are respected and have their needs met. This includes modeling attention and concern for Jewish students' rights and needs together with those of other groups; explicitly condemning antisemitic incidents; attending Jewish student events and celebrations; and ensuring that cultural and



religious sensitivity policies also include areas of concern for Jewish students and families.

- **We call on schools and colleges to ensure efforts to prevent and address antisemitism are integrated into their DEIA programs, including into mandatory trainings on discrimination and harassment.**
- **We call on schools and colleges to enhance awareness of religious cultures and practices. Ensuring accommodation of religious observances, including Jewish observances—such as observance of the Jewish Sabbath, major Jewish holidays, and dietary requirements—helps Jewish students feel included on campus. Schools should also ensure these accommodations for the cultures and practices of other faiths.**
- **We call on a diverse range of student groups in K-12 schools and colleges to play a role in preventing and addressing antisemitism. This may include condemning antisemitic incidents on their campuses, hosting events alongside Jewish organizations on a wide range of topics, and educating their membership about cross-cultural solidarity.**
- **We call on Jewish student groups in K-12 schools and colleges to consider developing materials for their campus communities on how to identify and combat antisemitism, hosting events alongside non-Jewish organizations, and encouraging participation across campus at events held at Jewish venues, such as campus Hillel buildings.**

Strategic Goal 3.5—Use Federal Nondiscrimination Laws to Counter Antisemitic and Related Forms of Discrimination

Depending on the context, antisemitic discrimination may be classified as discrimination on the basis of religion, national origin, ethnicity, or some combination of these factors. Several federal laws prohibit discrimination on these bases, among other grounds. (For further details, see Appendix B: Federal Civil Rights Laws Prohibiting Antisemitic Discrimination).

Government agencies that enforce such laws seek to prevent discrimination by ensuring that these legal obligations are widely understood and observed. In addition, anti-discrimination enforcement agencies take steps to make sure communities know how to file complaints when they believe such discrimination has occurred. They also take action to enforce our country's civil rights laws. (For further details, see Appendix C: Illustrative Federal Enforcement Actions).

With respect to antisemitism and related forms of discrimination, the federal government will do more to increase awareness of these laws and how to report alleged violations. When developing materials on discrimination, agencies will consult with a full array of community members. Federal outreach efforts regarding antisemitic discrimination will include diverse Jewish organizations with attention to sectors of the Jewish community that have been disproportionately targeted by antisemitism. Government agencies will also fully enforce these prohibitions on discrimination.



Executive Branch Actions

- **Eight agencies—USDA, DOL, HHS, the Department of Housing and Urban Development (HUD), DHS, DOI, the Department of Transportation (DOT), and Treasury**—will produce fact sheets explaining that Title VI of the 1964 Civil Rights Act prohibits discrimination based on shared ancestry or ethnic characteristics, including certain forms of antisemitic, Islamophobic, and related forms of discrimination and bias, in federally funded programs and activities. This will be the first time these agencies have recognized in writing that Title VI prohibits such forms of discrimination in their federally funded programs and activities. *(By September 2023)*
- **These agencies, along with DOJ and ED**, will also take other steps to increase awareness of laws prohibiting antisemitic, Islamophobic, and related forms of discrimination and bias and to ensure that individuals and organizations know how to make claims regarding violations of such laws. These steps will include engaging with entities that are prohibited from discriminating in these ways to explain their legal responsibilities and informing communities of their rights to be free from discrimination and how to file complaints.ⁱⁱ *(By November 2023)*
- **DOJ** will continue and increase its efforts to educate the public and work to raise awareness about the requirements of the Religious Land Use and Institutionalized Persons Act (RLUIPA). *(By September 2023)*
- **OPM** will share a toolkit and facilitate learning sessions for federal unions on countering antisemitism, Islamophobic, and related forms of bias and discrimination. OPM will also survey federal agencies to identify agency trainings that could amplify this strategy’s directives, and will prompt agencies to create new trainings that support this strategy. *(By November 2023)*

ⁱⁱ To the extent authorized by agencies’ statutes and regulations and as appropriate, additional steps will include:

- Agencies with authorities prohibiting religious discrimination will take steps to increase awareness of those authorities in the context of the agency’s programs, featuring examples of antisemitic, Islamophobic, and other forms of religious discrimination.
- Agencies will ensure that examples of antisemitic, Islamophobic, and related forms of unlawful discrimination are incorporated into existing agency materials that educate agency personnel as well as external stakeholders about the coverage of relevant civil rights statutes and/or regulations.
- Agencies will create or update public landing pages on their websites on religious discrimination and/or discrimination on the basis of ethnicity or shared ancestry, where relevant agency authorities and resources will be featured.
- Once agencies have successfully resolved cases involving claims of antisemitic, Islamophobic, and related forms of discrimination, they will make efforts to publicize the resolution of those cases as appropriate.
- Agencies will develop educational resources for Jewish, Muslim, Sikh, Hindu, and other communities, informing them of their rights to be free from discrimination and will help those communities navigate and understand those resources.
- If agencies have the legal authority to do so, they will investigate complaints alleging antisemitic, Islamophobic, and related forms of discrimination.
- Agencies that have existing data collections on antisemitic, Islamophobic, and related forms of discrimination will publicize those collections as appropriate.



- **DOT, through the Federal Transit Administration**, will initiate research to identify the data available at the transit-agency level to better understand the extent to which race, ethnicity, and religion or religious appearance impact assaults on, harassment of, and discrimination against transit riders. *(By November 2023)*
- **DOT's Anti-Discrimination Subcommittee of its Aviation Consumer Protection Advisory Committee (ACPAC)** will make public recommendations to the ACPAC on best practices or actions that can be taken by DOT, airlines, or other entities to ensure nondiscriminatory delivery of airlines' programs and activities to air travelers, including with respect to the race, ethnicity, and the religious identity and practices of passengers. *(By March 2024)*
- **HUD** will include examples of antisemitic and Islamophobic housing discrimination in its initiative to educate young adults from high school through adulthood on their fair housing rights. HUD will also partner specifically with Jewish, Muslim, Sikh, and other faith-based organizations to educate young adults on their fair housing rights. *(By September 2023)*
- **HUD** will issue a letter to the over 200 federally-funded Fair Housing Initiatives Programs and Fair Housing Assistance Programs on countering antisemitism, Islamophobia, and related forms of bias and discrimination in housing. The letter will include examples of these forms of housing discrimination and outline the rights people who experience discrimination have under the Fair Housing Act. *(By May 2023)*
- **HHS** will produce reference materials for medical schools and health care providers on discrimination in patient care on the bases of race, religion, ethnicity, and national origin, as well as discrimination against health care providers on the basis of their religious beliefs or moral convictions. These materials will include specific examples of antisemitic, Islamophobic, and related forms of bias and discrimination in health care settings. HHS will also offer trainings on HHS's antidiscrimination laws to medical schools nationwide to train future health care providers. *(By November 2023)*
- **DOD** will conduct a review of existing training to identify any gaps in coverage of antisemitic and Islamophobic conduct as a form of prohibited discrimination. *(By November 2023)*
- **VA** will investigate the feasibility of tracking incidents of religious discrimination against VA employees, broken down by specific religion. *(By May 2024)*

Whole-of-Society Calls to Action

- **We call on state and localities to** review their anti-discrimination laws and other authorities to identify all tools that can be used to address every form of discrimination and hate-fueled violence, including antisemitism, and ensure that they are using those authorities to the fullest extent possible.
- **We call on employers to** ensure that their policies and practices on discrimination and harassment are clear and vigorously enforced. When providing examples of harassment in company policy and training, employers should include obvious and more subtle examples of antisemitic and related forms of harassment. When providing training on



discrimination and implicit bias, employers should include examples involving antisemitism.

- **We call on bar associations and other legal networks** to increase awareness of legal authorities prohibiting antisemitic and related forms of discrimination, including by convening discussions of such authorities and producing resources on them.

Strategic Goal 3.6—Promote Religious Communities’ Equitable Access to Government Programs and Religious Accommodations

President Biden’s Executive Orders on advancing equity note that religious minorities, such as Jews, are among the communities that have sometimes been denied the consistent and systematic fair, just, and impartial treatment to which all individuals are entitled.⁵² In that spirit, the Administration will take steps to ensure that Jewish Americans receive consistent and systematic fair, just, and impartial treatment by all levels of government.

Executive Branch Actions

- **USDA** will work to ensure equal access to all USDA feeding programs for USDA customers with religious dietary needs. This will include increasing commercially available kosher and halal foods that are priorities for Jewish and Muslim program participants; expanding the number of kosher or halal certified foods in USDA’s food procurement; training schools on how to meet students’ religious dietary needs for the National School Lunch and School Breakfast programs; and expanding outreach and technical assistance for kosher and halal meat processors. *(By March 2024)*
- **HHS** will expand its engagement with chaplains and leaders from multiple faiths to promote increased cultural and religious competence in healthcare settings. This includes work with chaplains and faith leaders who are involved in patient care settings to better understand the specific needs of religious patients and staff, identify hospital policies and practices most affecting religious patients and healthcare staff, and synthesize the findings for doctors, nurses, and hospital administrators. *(By November 2023)*
- **HHS** will expand efforts to ensure kosher and halal foods are available in hospitals. *(By November 2023)*
- **VA** will continue to ensure all VA hospitals accommodate kosher and halal meal requests for inpatients and patient residents, as well as culturally appropriate nutrition education and counseling to meet the religious dietary needs of veterans. *(Ongoing)*
- **ED** will produce or disseminate webinars for public schools on religious accommodation requirements and best practices for addressing the needs of students and staff members who must be absent from school in order to celebrate religious holidays and/or engage in religious observances. *(By September 2023)*



- **EEOC** will broadly disseminate its materials on nondiscrimination and religious accommodations in the workplace to employers and employees, including federal agencies, nongovernmental employers, and workplace Employee Resource Groups. This will include the recently released EEOC fact sheet, “[What To Do If You Face Antisemitism at Work](#).” (*By September 2023*)

Whole-of-Society Calls to Action

- **We call on state and local leaders to** work with Jewish and other religious communities to ensure that calendars for public schools and elections consider the major holidays of religious groups of all faith communities, including Jewish, Buddhist, Hindu, Muslim, Orthodox Christian, and Sikh communities, and that appropriate religious accommodations are made.
- **We call on state and local leaders to** join the federal government in increasing access to kosher, halal, and other foods required to meet religious diets, including increasing such access in all government-funded feeding programs.
- **We call on hospitals and nursing homes to** join the federal government in increasing patient and family access to kosher, halal, and other foods required to meet religious diets.
- **We call on employers to** ensure that workers know about employers’ legal duty to accommodate workers’ sincerely held religious beliefs or practices unless the accommodation would impose an undue hardship on an employer’s business.
- **We call on bar associations and other legal networks to** increase awareness of legal authorities requiring or permitting religious accommodations for Jews and people of other faiths, including by convening discussions of such authorities and producing resources on them.



Pillar 4: Build Cross-Community Solidarity and Collective Action to Counter Hate

Antisemitism does not exist in a vacuum. While antisemitism has unique characteristics, people who express hatred toward Jews frequently hold other biases based on actual or perceived religion, race, ethnicity, national origin, sexual orientation, gender, or gender identity. The perpetrators of hate-fueled attacks frequently deploy rhetoric that contains antisemitic, anti-Black, and anti-LGBTQI+ themes. The Neo-Nazis who marched in Charlottesville in 2017 believed in a toxic brew of myriad hatreds. Those who target Jews also target women, Black, Latino, Muslim, AANHPI, and LGBTQ+ Americans, and so many other communities. One report found that 91% of Americans believe antisemitism is a problem for everyone, and yet, in many instances, Jews feel as though antisemitism is ignored, discounted, or not taken as seriously as other forms of hate and bigotry.⁵³

In the face of antisemitism, increased physical security is a vital and necessary precaution. But a sense of security also stems from a safety net of cross-community solidarity. That is why solidarity and mutual support across diverse communities of different backgrounds and beliefs is crucial. It is also one of our country's most important values. In September 2022, President Biden hosted the United We Stand Summit, gathering together Americans who represent the full spectrum of experience and diversity in our Nation to demonstrate solidarity against all forms of hate.

Still, targeted communities are often too siloed in their experiences of hate and attempts to combat it. Antisemitism and other forms of hate do not operate in isolation from each other; nor should the communities they target. Increasing space for deeper awareness, shared empathy, and action across communities is critical to preventing hate and building resilience in the face of rising antisemitic and other forms of hate-motivated violence.

It is imperative that non-Jewish and Jewish communities work together and stand up for each other in order to counter antisemitism and other forms of hate. It is essential that non-Jewish voices continue to speak out and intensify their efforts to combat antisemitism. These partners should reach into their own communities to explain the gravity and depravity of antisemitism, and also address specific instances of antisemitism that may arise. A diversity of voices and actors signals that antisemitism is not just a problem for Jews, but for all. At the same time, it is crucial that Jewish communities continue to speak out and intensify their efforts against other forms of hate that afflict so many different communities in America and support other communities when they are targeted.

We must all recognize that hate against one group of Americans threatens all other groups. Building on the United We Stand summit, the Administration will intensify its work to strengthen allyship across targeted communities and support efforts by other governmental actors and sectors to do the same. We will apply the lessons learned in developing this strategy to additional efforts to counter hate against other communities, including Muslim Americans, Sikh Americans, and other religious communities that experience hate-motivated violence and discrimination.



Strategic Goal 4.1—Identify and Scale the Most Effective Cross-Community, Solidarity-Building Efforts

A key aim of those who spread hate is to turn individuals against one another based on faith, race, national origin, ethnicity, sexual orientation, gender, gender identity, or other factors. We can counter these efforts by refusing to be divided. American Jewish communities have a long legacy of building cross-community relationships characterized by meaningful connection, trust, mutual respect, and understanding across differences. As they have throughout American history, partnerships across diverse communities and faiths provide a foundation to counter antisemitism and other forms of hate.

Cross-community coalitions can also respond with a unified voice against violence, discrimination, and bias in the immediate aftermath of antisemitic incidents, including with joint statements and other demonstrations of solidarity, coordinated community alerts, town hall meetings, or media events, and neighborhood safety events. After antisemitic slurs were spray-painted on a high school in Montgomery County, Maryland, in December 2022, for example, hundreds of neighbors turned out to light a Hanukkah menorah at the school.⁵⁴

Governments and nongovernmental entities must work together to identify, raise awareness of, and support the effective cross-community, solidarity-building efforts at the local and national levels.

Executive Branch Actions

- **The White House Office of Public Engagement** will launch the Ally Challenge, inviting Americans to describe their acts of allyship with Jewish, Muslim, or other communities that are not their own. Americans will be invited to share stories about steps they have taken to ensure that their neighbors of other races, ethnicities, religions, sexual orientations, genders, and gender identities, do not stand alone when they face discrimination and bias. Leaders of outstanding allyship projects will be recognized by the White House. *(By November 2023)*
- **The President’s Committee on the Arts and Humanities** will work with national and local leaders in the public, private and non-profit sectors to bolster social cohesion in America, advance the well-being and resilience of all communities, including Jewish Americans, and combat hate and targeted violence, including antisemitism. *(By November 2023)*
- **DOI** will work through NPS to create materials to highlight how parks and public lands are places of community and should be free of hate, discrimination, and bias. DOI’s NPS Community Engagement Program will also develop new partnerships with Jewish community organizations. *(By March 2024)*
- **ED** will highlight K-12 afterschool programs and university clubs that encourage multi-faith or cross-community bonding through shared experiences. *(By September 2023)*
- **IMLS** will strengthen its funding streams to encourage libraries, archives, and museums to leverage IMLS funding to take direct action and support cross-community solidarity building efforts to counter antisemitism and other forms of hate. *(By March 2024)*



- **AmeriCorps** will work with Service Year Alliance, a nonprofit that promotes national service, to develop resources for a 2023 pilot program aimed at understanding best practices for uniting young people across cultures, faiths, and backgrounds. *(By Spring 2024)*
- **HHS** will leverage the National Youth Sports Strategy (NYSS)⁵⁵ and the President's Council on Sports, Fitness & Nutrition⁵⁶ to spotlight how activities like sports, fitness, dance, cooking, volunteering and more can build community solidarity to counter antisemitism and other forms of hate. This will include a summer 2023 digital campaign led by members of the President's Council on Sports, Fitness & Nutrition encouraging the public to share personal stories of how activities like sports or cooking have promoted connection, inclusion, and cross-community solidarity. This will also include a partnership with the nonprofit Football for Peace to host a soccer Peace Match in Washington, D.C., in fall 2023, to showcase the importance of cross-community solidarity through sports. *(By November 2023)*

Calls to Congress

- **We call on Members of Congress** to lift up exemplary cross-community partnerships to counter hate, discrimination, and bias in their districts and highlight best practices from those partnerships.

Whole-of-Society Calls to Action

- **We call on Jewish civil society** to intensify their activities and efforts to combat hate, discrimination, and bias faced by other communities. Local Jewish communities should join multi-faith, interracial, cross-class coalitions and campaigns. This outreach can help build deeper and stronger relationships both within the Jewish community and between Jews and non-Jews who work in solidarity against hate, violence, and on other issues affecting their communities.
- **We call on communities that are the victims of hate and hate-fueled violence** to join with Jewish communities and civil society in solidarity and action against antisemitism.
- **We call on states and localities** to collaborate with nongovernmental partners to support local solidarity-building projects. An example of such partnerships is New York City's *Breaking Bread, Building Bonds* initiative.⁵⁷ The project aims to organize 1,000 meals, city-wide, each with a group of 10-12 diverse New Yorkers who engage in conversation about shared values, such as hospitality. New York City is partnering with The People's Supper, the United Jewish Appeal-Federation of New York, and several community-based organizations in this effort.
- **We call on service and volunteer programs** to partner with diverse schools, employers, and other civil society actors to incorporate solidarity-building work into their service activities.
- **We call on civil society organizations at the national, regional, and local levels** to identify evidence-based cross-community solidarity-building efforts and work to advance them in communities across the U.S.



Strategic Goal 4.2—Expand and Mobilize Multi-Faith Partnerships

The First Amendment guarantees robust religious liberty protections for people of all faiths and beliefs. The right to religious freedom has helped produce a vibrant and varied religious landscape in the United States. Countless Americans identify as people of faith, and many are active in houses of worship and other religious institutions or networks, including religiously-affiliated schools, faith-based service organizations, denominational conventions and associations, faith-based movements that advocate on public issues, and informal groups devoted to study of scripture, prayer, and mutual support. People of different faiths often come together to serve those in need, exchange ideas, stand in solidarity with one another, and partner on public issues of shared concern.

Leaders of diverse faiths, for example, marched together in Selma, Alabama, against Jim Crow segregation and in support of the Reverend Dr. Martin Luther King’s call for building the Beloved Community. They locked arms and faced down the Neo-Nazis in Charlottesville in 2017. When a gunman entered a synagogue in Colleyville, Texas, in January 2022, taking the rabbi and three worshippers hostage, a nearby Catholic church opened its doors to the hostages’ families and Baptist and Muslim neighbors arrived to help.⁵⁸ When the only mosque in Victoria, Texas, was burned to the ground in 2017 in a hate crime, the town’s sole rabbi handed mosque leaders a set of keys to the synagogue.⁵⁹ Throughout American history, Baptists and Buddhists, Jews and Jains, Mormons and Muslims, Sikhs and Seventh-day Adventists, among many others, have stood together countless times to advance principles of justice, civil rights for all, and *tikkun olam*—repairing the world.

This kind of multi-faith cooperation is essential to countering the scourge of antisemitism and other forms of hate, discrimination, and bias. It must be expanded and strengthened at this critical time in America’s history. Religious leaders and faith groups can and should lead the way. However, government can play a supporting role, including by using its power to convene and connect diverse leaders and share best practices.

Executive Branch Actions

- **The White House Office of Faith-Based and Neighborhood Partnerships**, in cooperation with federal agency Centers for Faith-Based and Neighborhood Partnerships and diverse faith leaders, will produce a toolkit for faith communities on standing in solidarity with other religious communities to combat antisemitism and other forms of hate. *(By September 2023)*
- **USDA** will convene a dialogue with religious leaders from across rural America to assess the state of antisemitism and highlight effective strategies to counter antisemitism, centered on building solidarity across faiths. *(By November 2023)*
- **The White House Office of Public Engagement and the White House Office of Faith-Based and Neighborhood Partnerships**, in cooperation with federal agency Centers for Faith-Based and Neighborhood Partnerships, will partner with diverse faith communities to organize a week of action devoted to forming or expanding and showcasing multi-faith partnerships aimed at countering antisemitism and other forms of hate. *(By November 2023)*



- **VA** will expand its chaplain partnership with Jewish, Muslim, and other chaplain associations and facilitate local multi-faith partnerships among chaplains of diverse faiths. *(By Summer 2023)*
- **HHS** will work with chaplains to promote and expand multi-faith partnerships in healthcare settings. *(By November 2023)*
- **AmeriCorps** will encourage multi-faith service projects for its 9/11 Day of Service. Through these service projects, Americans of different religions will have the opportunity to increase understanding and work together towards common service goals. *(By November 2023)*

Calls to Congress

- **We call on Members of Congress of different faith affiliations to** continue and expand efforts to come together across religions and political parties to speak out against hate, discrimination, and bias.

Whole-of-Society Calls to Action

- **We encourage non-Jewish faith leaders to** educate their communities about both antisemitism and Jewish heritage, history, and culture, as well as the core American principle that people of all faiths have equal rights to religious liberty.
- **We encourage non-Jewish faith leaders to** urge their communities to speak up when they hear speech that is antisemitic or witness antisemitic discrimination.
- **We encourage all faith leaders to** speak out publicly—and wherever possible, collectively—when anyone is attacked for their faith or religious identity. An attack on one must be treated as an attack on all.
- **We encourage all faith leaders to** continue the long and proud tradition of calling for full recognition of others' civil and human rights.
- **We encourage youth groups from a diverse range of religious communities to** develop and incorporate multi-faith social activities, service events, and educational programming into their curricula.



The Way Forward

This strategy represents the most comprehensive and ambitious effort to counter antisemitism in American history. We call for all actors—from the executive branch to Congress, from state and local governments to community and faith leaders, and from civil society to the private sector—to raise awareness about antisemitism and Jewish American heritage, safeguard Jewish communities, reverse the increasing normalization of antisemitism, and build allyship among diverse communities against all forms of hate. Everyone has a part to play in this effort.

This strategy sets clear goals, commits to new actions, and seeks to mobilize all of American society to counter antisemitism. It is a catalyst and a blueprint for the work ahead. Implementation and sustained focus on countering antisemitism is imperative if we, as a society, are to stem the tide of this hate and protect our democracy.

The Biden-Harris Administration will take the lead to implement this strategy, particularly the agency actions and commitments, through an ongoing interagency process, consisting of senior officials from agencies across the federal government, led and coordinated by the White House Domestic Policy Council and National Security Council. This interagency process will also encourage and support the whole-of-society actions called for in this strategy. This process will include working with bipartisan Members of Congress to pass needed legislation as well as ongoing engagement with state, local and nongovernmental stakeholders to advance the strategy's calls to action. This interagency process will convene at least semi-annually at the Principals' level to ensure expeditious implementation.

Strengthening democracy and accountability for hate in America is the ultimate long-term bulwark against rising antisemitism and other forms of hate. History shows that governments that value and support diversity and in which citizens feel empowered is one of the strongest antidotes to antisemitism, hate, and conspiracy theories.

We will continue to deliver for communities in our broader efforts to restore trust in government and protect democracy. We will continue to invest in strengthening the pillars, mechanics, and culture of democracy in America. We will continue to ensure that the large economic, private, and socio-cultural institutions that shape American life—from the tech sector to finance to media—are held accountable and serving the interests of ordinary people. The Administration will continue to invest in and promote civic virtues and urge all Americans to respect each other as fellow citizens.

Our country's culture of pluralism is one of our most cherished assets. We were founded on the idea that our whole is stronger than the sum of our parts. *E pluribus unum*: out of many, one.

This strategy represents a detailed plan to counter antisemitism in America as well as a foundation to tackle other forms of hate in our society, and to protect our greatest strength: our democracy.



Appendix

APPENDIX A: New York City Training — “Understanding Jewish Experiences and Antisemitism.”

In April 2022, New York City (NYC) released a training called, “Understanding Jewish Experiences and Antisemitism,” to develop cultural competence and understanding of its diverse Jewish communities.

The training introduces diverse Jewish cultures and religious practices, outlines ways to effectively understand and respect Jewish identity, and distills the protections of the NYC Human Rights Law.

One part of the training provides in-depth education on the experiences and customs of NYC’s Hasidic and other traditional Orthodox communities, who have disproportionately borne the brunt of recent antisemitic violent attacks.

NYC developed the training in partnership with local community groups. It has trained city employees, public officials, law enforcement, teachers, and others with this material. The training has also been used by thousands of NYC nonprofits, companies, schools, faith communities, and other institutions.

APPENDIX B: Federal Civil Rights Laws Prohibiting Antisemitic Discrimination

Federal civil rights laws prohibiting antisemitic discrimination include:

- Title II of the 1964 Civil Rights Act prohibits discrimination in certain places of public accommodation on the basis of a person’s race, color, religion, or national origin. Places of public accommodation include hotels, restaurants, retail establishments, theaters, concert halls, and sports arenas.
- Title III of the 1964 Civil Rights Act prohibits discrimination on the basis of a person’s race, color, religion, or national origin in public facilities such as parks, libraries, auditoriums, and prisons.
- Title IV of the 1964 Civil Rights Act protects students in public schools and colleges from discrimination based on race, color, religion, or national origin.



- Title VI of the 1964 Civil Rights Act prohibits discrimination based on race, color, or national origin in programs or activities receiving federal financial assistance. These protections have been interpreted to extend to individuals who have experienced discrimination, including harassment, based on their actual or perceived (i) shared ancestry or ethnic characteristics, or (ii) citizenship or residency in a country with a dominant religion or distinct religious identity. Thus, Title VI prohibits discrimination based on race, color, or national origin against individuals of any religion, such as those who are Jewish, Christian, Muslim, Sikh, Hindu, or Buddhist, where the discrimination involves, for example:
 - Racial, ethnic, or ancestral slurs or stereotypes;
 - How a student looks, including skin color, physical features, or style of dress that reflects both ethnic and religious traditions; and
 - A foreign accent, a foreign name, or speaking a foreign language.
- Title VII of the 1964 Civil Rights Act prohibits employment discrimination on the basis of race, color, religion, sex, and national origin by employers with fifteen or more employees. This prohibition on religious discrimination requires employers to provide reasonable accommodation of workers' religious practices, unless doing so would place an undue hardship on the business.
- The Fair Housing Act prohibits discrimination because of race, color, religion, or national origin, among other grounds, in the sale, rental, advertising, or financing of housing.
- The Equal Credit Opportunity Act prohibits discrimination in the extension of credit based on a person's race, color, religion, national origin, sex, marital status, or age, among other grounds.
- The Religious Land Use and Institutionalized Persons Act (RLUIPA) protects individuals, houses of worship, and other religious institutions from discriminatory or unduly burdensome zoning and other land use laws. This law also protects the right to free exercise of religion for institutionalized persons.

APPENDIX C:

Illustrative Federal Enforcement Actions

In August 2022, the Department of Education's Office for Civil Rights determined that an Arizona school district violated Title VI by failing to respond appropriately to notice of ongoing antisemitic harassment of a student by numerous classmates, both in school and on social media for over five months. The harassment included antisemitic slurs and disparaging remarks about the student's Jewish heritage. In the resolution agreement, the school district promised to address the student's academic and counseling needs; revise its policies and procedures to address the fact that Title VI's prohibition against harassment includes harassment based on Jewish ancestry; and train staff on these issues.



In September 2022, the Department of Education’s Office for Civil Rights found that peer harassment that included mimicking “Heil Hitler” salutes and drawing Swastikas on photographs of students’ faces created a hostile environment that another Arizona school district had notice of and failed adequately to address. To remedy the violations, the district agreed to provide support and remedies to affected students, conduct a climate assessment regarding harassment, review and revise policies to address harassment, train staff including regarding implicit bias, and provide developmentally appropriate educational programs for students about how to recognize and report harassment.

In April 2023, the Department of Education’s Office for Civil Rights resolved an investigation of the University of Vermont’s responses to allegations of antisemitic incidents that targeted Jewish students. The investigation confirmed that the University’s responsive steps were delayed; not designed to rectify concerns communicated to the University, including regarding the existence of a hostile environment; and may have discouraged students and staff from raising further concerns with the University regarding antisemitic harassment. To resolve the investigation, the University’s commitments include reviewing and revising policies and procedures to include a description of forms of discrimination that can manifest in the university environment, training university staff and leadership on the Title VI prohibition against harassment based on national origin, and submitting for Federal review copies of case files of complaints of antisemitism.

In October 2022, the Equal Employment Opportunity Commission filed a suit against emergency transport companies located in Greenwood Village, Colorado, alleging that they violated federal law by discriminating and retaliating against a nationwide class of applicants and employee first responders with sincerely-held religious beliefs that required them to wear beards, in conflict with these companies’ policy against facial hair. The class members include individuals who are Jewish, Sikh, and Baptist.

In March 2021, DOJ announced an agreement with the Township of Toms River, New Jersey, to resolve allegations that the Township violated the Religious Land Use and Institutionalized Persons Act (RLUIPA) by severely restricting where houses of worship could locate within its jurisdiction.⁶⁰



Endnotes

- ¹ Federal Bureau of Investigation (FBI). “FBI Releases Supplement to the 2021 Hate Crime Statistics.” March 13, 2023. <https://www.fbi.gov/news/press-releases/fbi-releases-supplemental-2021-hate-crime-statistics>.
- ² US Holocaust Memorial Museum. “Antisemitism in History: From the Early Church to 1400.” <https://encyclopedia.ushmm.org/content/en/article/antisemitism-in-history-from-the-early-church-to-1400>.
- ³ “Director Wray Addresses ADL at Never Is Now Summit.” November 10, 2022. <https://www.fbi.gov/news/speeches/director-wray-addresses-adl-never-is-now-summit-111022>.
- ⁴ ADL. “Antisemitic Attitudes in America: Conspiracy Theories, Holocaust Education and Other Predictors of Antisemitic Belief.” March 17, 2023. <https://www.adl.org/resources/report/antisemitic-attitudes-america-conspiracy-theories-holocaust-education-and-other>.
- ⁵ US Holocaust Memorial Museum. “Antisemitism in History: From the Early Church to 1400.” <https://encyclopedia.ushmm.org/content/en/article/antisemitism-in-history-from-the-early-church-to-1400>.
- ⁶ Library of Congress. “From Haven to Home: 350 Years of Jewish Life in America.” <https://www.loc.gov/exhibits/haventohome/haven-century.html>.
- ⁷ Public Broadcasting Service. “The Lynching of Leo Frank.” August 17, 2021. <https://www.pbs.org/wnet/exploring-hate/2021/08/17/today-in-history-the-infamous-trial-of-leo-frank/>.
- ⁸ US Holocaust Memorial Museum, “Antisemitism in History: The Era of Nationalism, 1800-1918.” <https://encyclopedia.ushmm.org/content/en/article/antisemitism-in-history-the-era-of-nationalism-1800-1918?series=30>.
- ⁹ Greenberg, Susan H. “Intellectuals at the Gate.” Inside Higher Ed. September 21, 2022. <https://www.insidehighered.com/news/2022/09/22/how-ivy-leagues-jewish-quotas-shaped-higher-education>; Tablet Studios. “Gatecrashers.” 2022. <https://podcasts.apple.com/us/podcast/gatecrashers/id1640617083>.
- ¹⁰ Public Broadcasting Service. “The Father Coughlin Story.” March 9, 2022. <https://www.pbs.org/wnet/exploring-hate/2022/03/09/today-in-history-the-father-coughlin-story/>.
- ¹¹ US Holocaust Memorial Museum. “Charles Lindbergh Makes ‘Un-American’ Speech.” <https://newspapers.ushmm.org/events/charles-lindbergh-makes-un-american-speech>.
- ¹² Whitman, James Q. “Hitler’s American Model: *The United States and the Making of Nazi Race Law*.” Princeton University Press. February 21, 2017. <https://press.princeton.edu/books/hardcover/9780691172422/hitlers-american-model>.
- ¹³ Gross, Daniel A. “The U.S. Government Turned Away Thousands of Jewish Refugees, Fearing that They were Nazi Spies.” *Smithsonian Magazine*. November 18, 2015. <https://www.smithsonianmag.com/history/us-government-turned-away-thousands-jewish-refugees-fearing-they-were-nazi-spies-180957324/>.
- ¹⁴ FBI. *Ibid*.
- ¹⁵ ADL. “Audit of Antisemitic Incidents 2022.” March 23, 2023. <https://www.adl.org/resources/report/audit-antisemitic-incidents-2022>.
- ¹⁶ Bauder, David. “What is ‘great replacement theory’ and how does it fuel racist violence?” Associated Press. May 16, 2022. <https://www.pbs.org/newshour/politics/what-is-great-replacement-theory-and-how-does-it-fuel-racist-violence>.
- ¹⁷ Eshed, Tom. “Antisemitism in the United States: A Critical Look at the Data, Monitoring, and Measurement.” INSS. October 13, 2021. <https://www.inss.org.il/publication/antisemitism-data/>.



- ¹⁸ ADL. “Audit of Antisemitic Incidents 2021.” May 3, 2022. <https://www.adl.org/resources/report/audit-antisemitic-incidents-2021>; ADL. “Audit of Antisemitic Incidents 2022.” March 23, 2023. <https://www.adl.org/resources/report/audit-antisemitic-incidents-2022>.
- ¹⁹ ADL. “Online Hate and Harassment: The American Experience 2022.” June 20, 2022. <https://www.adl.org/resources/report/online-hate-and-harassment-american-experience-2022>.
- ²⁰ Ehsan, Rakib. “Weaponizing COVID-19: Far-Right Antisemitism in the United Kingdom and United States.” Henry Jackson Society. 2020. <https://henryjacksonsociety.org/wp-content/uploads/2020/05/HJS-COVID-19-Far-Right-Report.pdf>.
- ²¹ The Department of Justice. “Raising Awareness of Hate Crimes and Hate Incidents during the COVID-19 Pandemic.” May 20, 2022. <https://www.justice.gov/file/1507346/download>. Page 11.
- ²² Associated Press, “Antisemitic Celebrities Stoke Fears of Normalizing Hate.” December 4, 2022. <https://www.politico.com/news/2022/12/04/antisemitic-celebrities-stoke-fears-of-normalizing-hate-00072073>.
- ²³ National Archives, “From George Washington to the Hebrew Congregation in Newport, Rhode Island, 18 August 1790.” <https://founders.archives.gov/documents/Washington/05-06-02-0135>.
- ²⁴ The White House. “Statement from White House Press Secretary Karine Jean-Pierre on Inter-Agency Group to Counter Antisemitism.” December 12, 2022. <https://www.whitehouse.gov/briefing-room/statements-releases/2022/12/12/statement-from-white-house-press-secretary-karine-jean-pierre-on-inter-agency-group-to-counter-antisemitism/>.
- ²⁵ Claims Conference. “First-Ever 50 State Survey on Holocaust Knowledge of American Millennials and Gen Z Reveals Shocking Results.” September 16, 2020. <https://www.claimscon.org/millennial/study/>.
- ²⁶ United States Holocaust Memorial Museum, Report to Congress: Never Again Education Act (February 1, 2023).
- ²⁷ “Rosen-led Never Again Education Act Signed into Law.” May 29, 2020. <https://www.rosen.senate.gov/2020/05/29/rosen-led-never-again-education-act-signed-into-law/>.
- ²⁸ Lee, Matthew and Beck, Molly. “Assessing the Impact of Holocaust Education on Adolescents’ Civic Values: Experimental Evidence from Arkansas.” EDRE Working Paper 2019-08. March 25, 2019. <https://scholarworks.uark.edu/cgi/viewcontent.cgi?article=1074&context=edrepub>.
- ²⁹ Gonzales, Matt. “Combating Antisemitism in the Workplace.” Society for Human Resource Management. February 1, 2022. <https://www.shrm.org/resourcesandtools/hr-topics/behavioral-competencies/global-and-cultural-effectiveness/pages/combating-antisemitism-in-the-workplace.aspx>.
- ³⁰ The White House. “Executive Order on Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce.” June 25, 2021. <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/06/25/executive-order-on-diversity-equity-inclusion-and-accessibility-in-the-federal-workforce/>.
- ³¹ Huffnagle, Holly & Bandler, Kenneth. “The State of Antisemitism in America 2022: Insights and Analysis.” April 14, 2023. <https://www.ajc.org/news/the-state-of-antisemitism-in-america-2022-insights-and-analysis>.
- ³² Freilich, Joshua and Steven Chermak. “Hate Crimes.” June 2013. https://popcenter.asu.edu/sites/default/files/sites/default/files/problems/pdfs/hate_crimes.pdf.
- ³³ Stening, Tanner. “Why Hate Crimes are Underreported and What Police Departments have to do with It.” *Northeastern Global News*. August 23, 2021. <https://news.northeastern.edu/2021/08/23/why-hate-crimes-are-underreported-and-what-police-departments-have-to-do-with-it/>.
- ³⁴ Huffnagle, Holly & Bandler, Kenneth. *Ibid*.
- ³⁵ “Associate Attorney General Vanita Gupta Issues Statement on the FBI’s Supplemental 2021 Hate Crime Statistics.” March 13, 2023. <https://www.justice.gov/opa/pr/associate-attorney-general-vanita-gupta-issues-statement-fbi-s-supplemental-2021-hate-crime>.



³⁶ Von Mering, Sabine. “The Dark Side of Social Media: How it Fuels Antisemitism.” May 13, 2022. <https://www.brandeis.edu/jewish-experience/social-justice/2022/may/antisemitism-social-media.html>.

³⁷ See <https://www.dhcs.ny.gov/system/files/documents/2023/04/2023-nys-tvp-strategy.pdf>; https://dod.hawaii.gov/ohs/files/2022-HAWAII-TARGETED-VIOLENCE-PREVENTION-STRATEGY_FINAL.pdf; <https://ciacco.org/default.aspx?MenuItemID=63&MenuSubID=23&MenuGroup=Public+Home&AspxAutoDetectCookieSupport=1#:~:text=The%20Colorado%20Preventing%20Targeted%20Violence,targeted%20violence%20with%20the%20state>.

³⁸ The White House. “Executive Order on Reducing Gun Violence and Making Our Communities Safer.” March 14, 2023. <https://www.whitehouse.gov/briefing-room/presidential-actions/2023/03/14/executive-order-on-reducing-gun-violence-and-making-our-communities-safer/>.

³⁹ For more, see <https://acl.gov/programs/strengthening-aging-and-disability-networks/advancing-care-holocaust-survivors-older>.

⁴⁰ AJC. “The State of Antisemitism in America 2022.” 2023. <https://www.ajc.org/AntisemitismReport2022>.

⁴¹ Heschel, Abraham Joshua. “The Reason for My Involvement in the Peace Movement.” *Moral Grandeur and Spiritual Audacity*. pp. 224-6. 1997. ISBN: 037419980.

⁴² Duffy, Claire. “Tech Layoffs are hitting Ethics and Safety Teams.” *CNN*. April 6, 2023. <https://www.cnn.com/2023/04/06/tech/tech-layoffs-platform-safety/index.html>.

⁴³ Porter & Wood. “The global effectiveness of fact-checking: Evidence from simultaneous experiments in Argentina, Nigeria, South Africa, and the United Kingdom.” July 21, 2021. <https://doi.org/10.1073/pnas.2104235118>; Brodsky et. al. “Improving college students’ fact-checking strategies through lateral reading instruction in a general education civics course.” March 31, 2021. <https://doi.org/10.1186/s41235-021-00291-4>.

⁴⁴ ADL. “Audit of Antisemitic Incidents 2022.” March 23, 2023. <https://www.adl.org/resources/report/audit-antisemitic-incidents-2022>.

⁴⁵ ADL. “The ADL-Hillel Campus Antisemitism Survey: 2021.” October 20, 2021. [The ADL-Hillel Campus Antisemitism Survey: 2021 | ADL](https://www.adl.org/resources/report/the-adl-hillel-campus-antisemitism-survey-2021).

⁴⁶ Hersh, Eitan. “Jewish College Students in America.” Jim Joseph Foundation. August 2022. https://jimjosephfoundation.org/wp-content/uploads/2022/11/HERSH_REPORT-11.1.22.pdf.

⁴⁷ U.S. Department of Education. “U.S. Department of Education’s Office for Civil Rights Resolves Investigation Addressing the University of Vermont’s Responses to Allegations of Antisemitic Incidents.” April 3, 2023. <https://www.ed.gov/news/press-releases/us-department-educations-office-civil-rights-resolves-investigation-addressing-university-vermonts-responses-allegations-antisemitic-incidents>.

⁴⁸ Santola, Danielle. “Anti-Semitic Drawings Discovered at Livingston Schools for Fifth Time in Four Months.” *TAP into Livingston*. December, 22, 2022. <https://www.tapinto.net/towns/livingston/sections/education/articles/anti-semitic-drawings-discovered-at-livingston-schools-for-fifth-time-in-four-months>.

⁴⁹ Asbury, Nicole. “Montgomery County schools toughen penalties after more antisemitic incidents.” *The Washington Post*. February 22, 2023. <https://www.washingtonpost.com/education/2023/02/22/antisemitism-montgomery-county-schools/>.

⁵⁰ ADL. “Audit of Antisemitic Incidents 2022.” March 23, 2023. <https://www.adl.org/resources/report/audit-antisemitic-incidents-2022>.

⁵¹ U.S. Department of Education. *Ibid*.



⁵² [Executive Order 13985](#), “Advancing Racial Equity and Support for Underserved Communities Through the Federal Government” (January 20, 2021) and [Executive Order 14091](#), “Further Advancing Racial Equity and Support for Underserved Communities Through the Federal Government” (January 16, 2023).

⁵³ *AJC. Ibid.*

⁵⁴ Pollak, Suzanne. “Hundreds Gather to Declare Jews Are Welcome in Montgomery County.” *Montgomery Community Media*. December 19, 2022. <https://www.mymcmedia.org/hundreds-gather-to-declare-jews-are-welcome-in-montgomery-county/>.

⁵⁵ U.S. Department of Health and Human Services Office of Disease Prevention and Health Promotion. “About the National Youth Health Strategy.” May 25, 2022. <https://health.gov/our-work/nutrition-physical-activity/national-youth-sports-strategy/about-national-youth-sports-strategy>.

⁵⁶ U.S. Department of Health and Human Services Office of Disease Prevention and Health Promotion. “President’s Council on Sports, Fitness & Nutrition.” October 29, 2021. <https://health.gov/our-work/nutrition-physical-activity/presidents-council>.

⁵⁷ New York City Commission on Human Rights. “NYC Commission on Human Rights Launches Timely New Training to Understand Jewish Experiences and Antisemitism.” April 13, 2022. <https://www.nyc.gov/assets/cchr/downloads/pdf/press-releases/jewish-new-yorkers-training-press-release.pdf>.

⁵⁸ The White House. “Remarks by President Biden at the National Prayer Breakfast.” February 3, 2022. <https://www.whitehouse.gov/briefing-room/speeches-remarks/2022/02/03/remarks-by-president-biden-at-the-national-prayer-breakfast/>.

⁵⁹ U.S. Department of Justice. “Texas Man Sentenced to Almost 25 Years for Hate Crime in Burning Down Mosque in Victoria, Texas.” October 17, 2018. <https://www.justice.gov/opa/pr/texas-man-sentenced-almost-25-years-hate-crime-burning-down-mosque-victoria-texas>.

⁶⁰ U.S. Department of Justice “Justice Department Settles Claims Against Toms River, New Jersey Over Zoning Code that Restricts Houses of Worship.” March 10, 2021. [Justice Department Settles Claims Against Toms River, New Jersey Over Zoning Code That Restricts Houses of Worship | OPA | Department of Justice](#).

A-276

Exhibit FF-1

A-277

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COMBAT ANTISEMITISM

ADL Shaped White House National Strategy to Counter Antisemitism



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A-279

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ADL's COMBAT Plan vs. White House
National Strategy to Counter Antisemitism

COMBAT PLAN PILLAR	COMBAT PLAN PRIORITY	COMBAT PLAN INITIATIVES (EXAMPLES)	INCLUDED IN WHITE HOUSE NATIONAL STRATEGY?
COMBAT Condemn Antisemitism	Challenge antisemitism in the United States via a whole-of-government strategy.	Expand agency portfolios and expertise to address antisemitism, particularly within existing civil rights offices. Incorporate antisemitism education and training in government, as part of Diversity, Equity, and Inclusion (DEI) efforts and other anti-bias initiatives.	✓
	Adopt the International Holocaust Remembrance Alliance (IHRA) Working Definition of Antisemitism.		✓
O Oppose Hate and Extremism Driven By Antisemitism	Support hate crime laws and improve hate crime data collection and reporting.	Expand policies, procedures, response, training, and assistance to improve the policing and prosecution of hate crimes. Increase hate crimes training and institute programs to build stronger relationships with impacted communities to improve the investigation and response to such crimes.	✓
	Adopt wide-ranging measures to combat all forms of domestic antisemitic violent extremism.		✓
M Make Institutions Safe from Antisemitism	Protect the physical security of Jewish community institutions.	Invest in programs supporting physical security enhancements and activities to protect community institutions.	✓
	Safeguard Jewish students in post-secondary institutions.	Promptly complete investigations of Title VI complaints relating to antisemitism and other instances of discrimination in higher education. Provide technical assistance regarding campus antisemitism directly to colleges, universities, Jewish students, and Jewish faculty about civil rights protections afforded to Jewish students under federal civil rights. Federal and state Departments of Education and post-secondary institutions should rigorously enforce existing anti-discrimination policies and ensure that appropriate disciplinary measures are employed against individuals and institutions when appropriate.	✓

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	Appropriateness	
B Block Antisemitism ADL's Priorities Committee for the National Strategy to Counter Antisemitism	Reform Section 230. Advocate for Targets of Online hate and Government.	✓
1. Address antisemitism across the political spectrum, including adopting the IHRA definition		✓
2. Combat antisemitism on college campuses & protect Jewish students		✓
3. Recognize & confront online antisemitism		✓
4. Improve hate crime reporting		✓
5. Protect the physical security of Jewish community institutions and promote national security		✓
6. Ensure a robust Office of the Special Envoy to Monitor and Combat Antisemitism with suitable staffing and resources		-✓
7. Promote cross-community engagement with diverse partners across the country to build mutual understanding and fight antisemitism		✓
8. Include antisemitism in DEI/A training for federal employers to promote an inclusive workplace where Jewish employees can be their authentic selves		✓



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Exhibit GG

The
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NATIONAL

‘We Need Minister Farrakhan,’ Say Black College Students



by **Washington Informer**
December 2, 2014



After more than a 29-year-old absence from Morgan State University, the Honorable Minister Louis Farrakhan speaks to a packed auditorium on Nov. 22 at the Murphy Fine Arts Center. More than 2,000 people including students, community leaders and distinguished guests came to hear the timely lecture given by the 81 one-year old Nation of Islam leader. (Mikal Veale/choiceimagery)



After more than a 29-year-old absence from Morgan State University, the Honorable Minister Louis Farrakhan speaks to a packed auditorium on Nov. 22 at the Murphy Fine Arts Center. More than 2,000 people including students, community leaders and distinguished guests came to hear the timely lecture given by the 81 one-year old Nation of Islam leader. (Mikal Veale/choiceimagery)

Consciousness raised, leadership challenged by Muslim leader at HBCU conference

by Askia Muhammad

Special to the NNPA from The Final Call

BALTIMORE – After a 29-year absence from appearing at Morgan State University (MSU), the Honorable Minister Louis Farrakhan returned to the campus Nov. 22 with fiery words and encouragement for the young people at Morgan State and at all Historically Black Colleges and Universities (HBCUs), to do what their generation is called at this time to do.

“It’s been very difficult for me to get into Black colleges and universities, to talk with our students,” Minister Farrakhan explained to more than 2,000 students and guests who packed the Murphy Fine Arts Center, including both balconies. “Fear chokes leaders. I really understand.



Chinedu Nwokefor

“But I am here tonight to help you out of your fearful behavior, because you, in that state have become an enemy to the rise of your people. I want to talk to the elders, and I want you to hear your brother, because I’m an elder like you.

“If I live a few more months, I’ll be 82, and I’m not tired. I’m inspired. See, when you love your people, you don’t get tired serving them. You get tired when you can’t serve them anymore. You are ready to be served,” the Minister said.

“On the shoulders of this new generation, the hopes of our ancestors will be fulfilled,” he continued. “We are at the time of the judgment, the time of the fall and destruction of this present world, in which we live. That is what you are called to do,” the Muslim leader said, specifically to the young people in the audience.

Young student leaders from HBCUs all over the country worked together for more than two years to bring about Minister Farrakhan’s return to the Morgan State campus. The hardest part of their challenge, the student leaders revealed, “Was getting the administration to understand that we needed Min. Farrakhan.”

Inspiration despite opposition



The event was sponsored by the Student Government Association of MSU, whose president, vice president and dozens of other student leaders were in attendance along with Dr. Kevin Banks, the school's Vice President for Student Affairs who was representing college President David Wilson who had a previous engagement and African American studies Professor Ray Winbush. Also present were Jill Carter, a member of the Maryland House of Delegates; the Rev. Willie Wilson, pastor of Washington's Union Temple Baptist Church; nationally known pastor Jamal Bryant; and Larry Young, a radio host.

Activist Pam Africa, a founder of the International Friends and Family of political prisoner Mumia Abu-Jamal was also a guest. She is also a survivor of the 1985 Philadelphia police department massacre of six adults and five children, members of John Africa's MOVE organization, when police dropped a fire bomb on their residence from a helicopter to end a standoff. Other special guests included, Marshall Eddie Conway, former Defense Minister of the Baltimore Black Panther Party, who served 44 years in prison for a crime he did not commit. They joined dozens of other Christian pastors, Muslim Imams, Nation of Islam officials and members of Omega Psi Phi Fraternity.



Audience applauds Min. Farrakhan's message Photo: Jaiyon Muhammad



Young woman and child attend program at Morgan State University



Older and younger men enjoyed a powerful message.

The fraternity, which Minister Farrakhan pledged, but was “blackballed” from membership when he was a student at Winston-Salem Teachers College—now Winston Salem State—presented Minister Farrakhan a lifetime achievement award. On another occasion the Muslim leader was presented an honorary membership.

The broad cross section of support and standing-room-only attendance came in the face of a protest from Jay Bernstein, host of Baltimore’s weekly Jewish radio program, “Shalom USA,” who wrote an article in The Baltimore Sun, calling on the university to denounce Minister Farrakhan.

Instead, the night’s host, Farajji Muhammad, host of “Listen Up” heard on MSU’s WEAA-FM rebuked the writer. “Oh Mr. Bernstein, you don’t know what time it is,” Mr. Muhammad said. “The last time I checked, slavery was over.” He continued pointing out that even the newspaper’s masthead features a drawing of a slave ship.



The address marked the conclusion of this year's Second Annual Black United Summit International (BUSI) conference, "Where all HBCUs come together." BUSI was led by Samuel X, a graduate from Tennessee State University (TSU), who heard Min. Farrakhan speak at a conference in 2010, was transformed by the experience, and then fought for two years to get the Muslim leader to speak on his campus in 2012, overcoming one agreed upon speaking engagement which was cancelled, but was eventually rescheduled seven months later.

When Min. Farrakhan last spoke at MSU 29 years ago, none of the current student leaders were even alive. "I never met a man with a greater love for the next generation," Mr. Muhammad said. "We are a generation of thinkers, movers, and activists." Still, the student leaders realize that 51 percent of college graduates today are unemployed or under-employed.



“We need to finance our minds,” another student leader—Chinedo Nwokeafor, this year’s BUSI leader on the MSU campus said as he introduced Min. Farrakhan. “A big issue we suffer from, is we blame the oppressor, when we are finishing the job for them.”

For his part, Min. Farrakhan picked up on the theme of the financial burden students face. “Debt is a new form of slavery,” the Muslim leader said. “You come out with a B.S. degree and that’s about what it is. God came to save us from our enemy, but we have become the enemy of self.”

“We have cried out to God,” Min. Farrakhan continued, but too often “we are hoping the liar and deceiver will (treat us) better.” Your own actions “can be a tool for your liberation or for your continued suffering.”



Minister Farrakhan reminded his audience that Blacks in the Americas—the U.S., the Caribbean, Latin America—are like the Biblical parable of the “Prodigal Son, in a strange land, feeding swine.” But in many ways “your thirst and lust for filth is what swine eat.”

A challenge to Black leadership

Black leaders, including fellow religious leaders to President Barack Obama are in error, Min. Farrakhan said, for trying to pacify protesters—especially those in Ferguson, MO.—who have a right to express outrage over police brutality. White authorities who have condoned and permitted the mistreatment of Blacks are afraid of what’s going to happen in Ferguson when the grand jury there announces its decision concerning the prosecution of Officer Darren Wilson, who shot unarmed 18-year old Mike Brown on August 9.

“They know an explosion is going to come,” the Nation of Islam leader said to cheers. “You leaders are the worst. Tonight in Ferguson everyone is on edge. White folks ain’t never been on edge after they’ve killed a Black man. Tonight they’re on edge. So on edge that our president has come out from behind the curtain to ask Black young people, ‘cool it.’”

“You leaders are the worst. When you talk to young people, you can’t feel that you’re missing them? Parents, you can’t feel when you’re talking to your children that this is a new generation and they don’t want to hear your compromising? But time has moved on. Your day of leading our people is over.

“You preachers—your day of being the pacifier for the White man’s tyranny on Black people is over. You’ve got to know they’re not going to hear you anymore.

“This university and all HBCUs are under attack,” Min. Farrakhan warned. “Why are they under attack” by White colleges and by state and federal legislators? “From HBCUs is where our great leaders came,” in the

past. “White people see that. White folks are looking at you.”

The HBCUs however, have not been “producing builders, producing new minds” which can prepare Black agriculturists, Black civil, electrical, and mechanical engineers. Instead, the Minister warned, “you are being taught to look for a job.”

The response from the enthusiastic audience was electric, as Min. Farrakhan advised the audience again and again, “I want to challenge you students to not get some meaningless degree. Challenge yourself to get something that will let you build a future.

“You’ve got it,” the Nation of Islam leader told the students concerning their attitudes, “but you’re not getting it,” concerning the education students are receiving at most HBCUs. “The elders are going to die in the wilderness,” Min. Farrakhan said, referring to the Biblical parable of The Exodus.

“But God will not let you into The Promised Land because you have too much of Pharaoh in you. Don’t be an apologist for White people. They don’t look at you on the same level as they see themselves.”

Consciousness pricked

Reactions to the Minister’s speech ranged from, “Hopefully young people will take up the mantle (of leadership),” as expressed by Real News TV producer Eddie Conway, to “The speech was an eye opener,” according to Morgan State marketing major Troy Griffin.

Long time Nation of Islam member Barbara Muhammad from Delaware said the speech was “prophetic and profound.” She said it was just what the students needed to “face the madness that they’ll be confronted with.” In addition, she said this is Min Farrakhan at his best, “teaching and preparing our future leaders.”

The Minister pricked the consciousness of those students seated in front of him. He articulated what many of the students had considered, but couldn’t articulate.



Twenty-one year-old Human Resource major, Alfred Johnson said he was astounded by the “level of consciousness” conveyed by the Minister. “It was eye opening. He spoke on things I thought of, but never really voiced.”

University of Maryland Eastern Shore graduate Jordan Hooper said the Minister’s message was the right message at the right time. The substance of the message was “well needed” at Morgan, and it encouraged him to “reach out to my alma mater and see if we can organize something there.”

Students from other schools represented included Syracuse University. Majoring in Nutrition Faecah Muhammad said the speech contained “a lot of things I could relate to.” She said what especially “touched” her was the Ministers message about agriculture and its importance. She said her plans after she graduates include “helping farmers and helping people in general have a better diet.”

Morgan State Alumni Marvin Brooks echoed the voice of many of the students. “Min Farrakhan is probably one of the most powerful... dynamic speakers of the generation.”

He compared his listening of the Minister’s message to a “sponge soaking in his message.”

Mr. Brooks said one of the things that really resonated with him from Min. Farrakhan was men taking on their responsibility as men. Men taking advantage of our women has to stop said Mr. Brooks. “Our women expect much more from men.”

Jehron Muhammad contributed to this report.

A-293

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Exhibit HH



OP-ED

Morgan leadership must denounce Farrakhan's appearance

By Jay Bernstein
Baltimore Sun • Last Updated: Nov 19, 2014 at 11:30 am



Listen to this article

Both as a matter of law and as a matter of public policy, student organizations at public universities are entitled to invite speakers of their choosing to address the student body, no matter how controversial the speaker or the speaker's message. However, the fact that student groups have the right to invite whom they want does not shield them from criticism when they select a speaker whose message is repugnant.

Such a speaker is Nation of Islam Minister Louis Farrakhan, who is scheduled to give the keynote address at the 2nd Annual "Black United Summit International." The summit, which is taking place Friday and Saturday on the campus of Morgan State University, is sponsored by the Morgan State University Student Government Association.

In addition to promoting an anti-white philosophy, Louis Farrakhan has a long record of demonizing Jews and the State of Israel. As noted by the Southern Poverty Law Center, Minister Farrakhan "blames the Jews for the slave trade, plantation slavery, Jim Crow, sharecropping and general black oppression." Mr. Farrakhan's speeches are rife with anti-Semitism and conspiracy theories, often referring to "satanic Jews" and "the synagogue of Satan," and accusing Jews of having a "stranglehold" on the U.S. government. A complete list of Mr. Farrakhan's long history of Jew-baiting can be found on the website of the Anti Defamation League.

Consistent with his slander of the Jewish people, Minister Farrakhan is equally defamatory toward the Jewish state. This past summer, his newspaper, The Final Call, described Israel's battle against the rockets launched against its cities by Hamas as "a continuation of the history and bloody policy of the Zionist state and its unapologetic effort to virtually exterminate civilians and wipe Palestine off the map." Mr. Farrakhan has denounced Israelis as "liars, thieves, murderers" who have "taken the position of God" and are out to "kill everybody."

Even if Minister Farrakhan avoids entirely the topics of Jews and Israel on Nov. 22, the date he's scheduled to speak, his mere presence at Morgan State University serves to confer legitimacy upon a person whose views should make him a pariah. Ultimately, Mr. Farrakhan's participation at the Black United Summit International represents a failure of judgment on the part of Morgan's Student Government Association that is no less objectionable for it being a legitimate exercise of the SGA's right of free expression.

As distressing as the student government's sponsorship of Minister Farrakhan's keynote address is the response of the leadership of Morgan, which to date, has been one of total silence. Contrast that with the reaction of University of California President Mark Yudof to the appearance of Minister Farrakhan at an "Afrikan Black Coalition Conference" organized by that university's Black Student Union several years ago. While defending the student union's right of free speech, Mr. Yudof denounced Mr. Farrakhan as a "a provocative, divisive figure with a long history of racist, anti-Semitic and homophobic speech," and characterized the invitation for him to speak on campus as "distressing in the extreme."

10/16/23, 6:57 PM

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While leaders of the university cannot (and should not) bar Minister Farrakhan from speaking, they also cannot permit their silence to be taken as tacit endorsement of his presence on campus.

As both public servants and academics, it is incumbent upon them to unequivocally distance the university from Mr. Farrakhan, to reject the student government's choice of Mr. Farrakhan as a speaker, and to alert unwary students to Mr. Farrakhan's toxic messages and views.

Morgan State University is committed to a series of "institutional core values" which guide the promotion of student learning and success, faculty scholarship and research, and community engagement. Among these core values are integrity, respect and diversity. It is time for university leaders to exhibit these values by speaking out against Louis Farrakhan's speech at Morgan on Saturday.

Jay Bernstein is host of Baltimore's weekly Jewish radio program, Shalom USA. His email is shalom@shalomusaradio.com.

Originally Published: Nov 19, 2014 at 11:33 am

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A-296

Case 1:23-cv-09110-DLC Document 72-38 Filed 01/06/24 Page 1 of 7

Exhibit II

A-297

Revised 7/09

MORGAN STATE UNIVERSITY MURPHY FINE ARTS CENTER

FACILITY LICENSING QUESTIONNAIRE

Presenting Organization: NATION of ISLAM: ^{MuHAMMAD Holy} Temple of ISLAM

Authorized Contact & Title: ADEMAH MUHAMMAD

Presenter Address: 7351 S. STONY ISLAND AVE.
Chicago, IL. 60649

Presenter Telephone: 404-202-8051 Fax: 770-819-1101

Presenter Email: ADEMAH@COMCAST.NET

Presenter Website: NOI.ORG

Event Name: HOLY DAY OF ATONEMENT: MILLION MAN MARCH ANNIVERSARY

Requested Performance Dates:

Option 1: SUN. OCT. 15 Option 2: SAT. OCT. 14 Option 3: _____

Requested Performance Time: 2:00 PM

Requested Performance Space: GILLIAM CONCERT HALL

Charges will be assessed for services according to rates set by the Venue. This Rental Questionnaire must be signed by an authorized User Representative in order to initiate a venue contract. BY COMPLETING AND SIGNING THIS AGREEMENT, THE USER ACKNOWLEDGES RECEIPT OF A COPY OF THE POLICIES AND PROCEDURES CONCERNING USE OF FACILITIES AND AGREES TO BE BOUND BY AND ADHERE TO THESE POLICIES AND PROCEDURES.

To ensure the success of your event, please complete this form to the fullest extent possible. If additions, deletions, or changes become necessary, please immediately contact the Murphy Fine Arts Center Director.

A-298

Revised 7/09

THIS QUESTIONNAIRE MUST BE RETURNED NO LATER THAN EIGHT (8) WEEKS BEFORE THE DATE OF THE EVENT. NO PUBLICITY OR TICKETS ON SALE PRIOR TO THIS AGREEMENT BEING RETURNED.

BOX OFFICE INFORMATION

Have you/your organization previously presented an event at Morgan State University or the Murphy Fine Arts Center? YES _____ NO ✓

If YES, When: _____

CHECK ONLY ONE

Reserved seating: _____ General Admission: ✓

Free Admission: _____

Special Ticket Pricing:
Public \$ _____

TO BE DETERMINED; Generally \$100 to \$25

Student \$ _____

Seniors \$ _____

Child \$ _____

Group \$ _____

Please indicate any discounts that will be offered.

Which ticket sales outlet(s) will you use?

Ticketmaster * ✓ (If you use TH)

Your own sales ** ✓

*** Morgan State University will collect facility maintenance fees at \$.50 per ticket sold through Ticketmaster outlets. ** Morgan State University will collect facility maintenance fees at \$1.00 per ticket sold by presenter where MFAC seating manifest is used.**

The Murphy Fine Arts Center Box Office is open 2 (two) hours prior to and ½ (half) hour past start time. Please indicate if additional time is requested.

YES _____ NO X

A-299

Revised 7/09

In preparation for Budget meeting and Facilities Walk-thru, please determine the ticket text. The date, time and location are generic to each ticket. **Event descriptions are limited to 3 lines of text with each line containing 30 characters including spaces.**

Requested On-Sale Date: 3 week before event

Provide a brief description of the event: A RELIGIOUS speaking EVENT.

Approximate Length of Event: 3 to 4 hours.

HOUSE MANAGEMENT

Merchandise Sales: YES NO

(A flat fee of \$300.00 is collected by Morgan State University per vendor table, per show.)

Number of Vendor Tables requested: TBD

Late seating instructions: TBD

Intermission(s): NO YES Length of intermission _____ minutes.

Coat Check: YES NO

FOOD SERVICE

Catering for Public Event: YES NO

Catering for Event Performer: YES NO

CHECK WHAT APPLIES N/A Breakfast N/A Lunch N/A Dinner

Date: _____ Time(s): _____ # of Guests: _____

A-300

Revised 7/09

MARKETING AND PUBLIC RELATIONS

Promotion of any event is the sole responsibility of the Presenter. Please refer to Policies and Procedures regarding promotional material and event advertising. **Please attach a news release, or forward release to the Murphy Fine Arts Center prior to date of ticket sales.**

ACKNOWLEDGED.

TECHNICAL SERVICES

SCHEDULE: (Please attach a separate list describing the flow of the day.)

IMPORTANT: Please attach a copy of the artist technical rider. A contract will not be released until the contract rider and proof of insurance have been presented.

	EVENT	TIME:	
	DATE(S)	FROM	TO
Performance	<u>Oct. 15</u>	<u>2PM</u>	<u>6:30PM</u>
Rehearsal	<u>NONE</u>	<u>NONE</u>	<u>NONE</u>
Set-up/Load-in	<u>Oct. 15</u>	<u>6AM</u>	<u>1PM</u>
Additional Rehearsal	<u>NONE</u>	<u>NONE</u>	<u>NONE</u>

EQUIPMENT NEEDS: Sound/Lighting/Projection (Indicate YES or NO and Quantity)

ITEM	YES	NO	QTY	ITEM	YES/NO	QTY
Lighting	Yes		TBD	Projection	Yes	TBD

A-301

Revised 7/09

House Sound system	<u>yes</u>	_____	Screen	<u>yes</u>	_____
DVD/CD Cassette Player	<u>1</u>	_____	Projector	<u>yes</u>	__
Vidco System	<u>yes</u>	_____	General Lighting	<u>1</u>	_____
Microphones w/stands	<u>yes</u>	_____	Follow Spot	<u>Possibly</u>	_____
Lavalier microphones	<u>NO</u>	_____	Special lighting	<u>yes</u>	_____
Audio Recording	<u>NO</u>	_____	Other: Please specify	<u>--</u>	_____
		_____			_____
		_____			_____
		_____			_____
		_____			_____

ADDITIONAL EQUIPMENT

<u>ITEM</u>	<u>YES</u>	<u>NO</u>	<u>QTY</u>	<u>ITEM</u>	<u>YES/NO</u>	<u>QTY</u>
Lectern	<u>1</u>	_____	_____	Chairs	<u>Room set to capacity</u>	_____
Podium	<u>yes</u>	_____	_____	Tables (6ft)	<u>Vending AREA</u>	_____
Music Stands	<u>NO</u>	_____	_____	Choir Risers	<u>NO</u>	_____
Conductor's Podium	<u>NO</u>	_____	_____	Band Risers	<u>NO</u>	_____
				Dance Floor	<u>NO</u>	_____

PIANO: (Indicate type) Upright Piano NO Grand Piano NO
 Tuning: Date: NO Time: _____

DRESSING ROOMS

Requested Quantity

One person: 5 (Limit 5 single rooms)
 Chorus: 4 (Limit 4 chorus rooms. Please indicate intended capacity of each.)

OTHER NEEDS

A-302

Revised 7/09

Please provide in the space below, any special requests or needs not previously addressed in this questionnaire.

See ATTACHED.

By completing this license questionnaire, the user acknowledges by signing below, receipt of a copy of the *Carl J. Murphy Fine Arts Center at Morgan State University Scheduling and Usage Policies* and agrees to be bound by and adhere to these policies and procedures.

Name: ADEMAH MUHAMMAD
Title: OFFICE of SPECIAL PROJECTS DIRECTOR
Organization: NATION of ISLAM
Date: AUGUST 20, 2023

FAX COMPLETED FORM TO: 443-885-8303

A-303

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Exhibit JJ

A-304

8/29/23, 9:25 PM

Case 1:23-cv-09110-DLC Document 72-39 Filed 01/06/24 Page 2 of 2



Abdul Arif Muhammad <abdularifmuhammad@gmail.com>

Fwd: Update Please.

1 message

ademah <ademah@comcast.net>
To: Arif Muhammad <abdularifmuhammad@gmail.com>
Cc: Ademah Muhammad <ademah@comcast.net>

Tue, Aug 29, 2023 at 9:17 PM

ASA. This is a forward of the denial, as well as the application that I kept very nebulous.

Bro. Ademah

Begin forwarded message:

From: "T. Jones" <Teesha.Jones@morgan.edu>
Subject: **Re: Update Please.**
Date: August 22, 2023 at 2:28:56 PM EDT
To: Ademah <ademah@comcast.net>
Cc: Dale Alston <Dale.Alston@morgan.edu>

Greetings Mr. Muhammad,

Thank you for your interest in the Murphy Fine Arts Center. Unfortunately, we can not honor your request. The type of event that you are asking to hold, is not suited for our center. However, should you have any further questions or concerns, please feel free to give us a call. We wish you the best with your event. Be well, take care.

On Tue, Aug 22, 2023 at 12:47 PM Ademah <ademah@comcast.net> wrote:
Greetings. Any updates, we have a meeting tomorrow.

Thank you.

Ademah Muhammad

Sent from my iPhone

--

Ms. Jones, Administrative Assistant
Murphy Fine Arts Center
Morgan State University
2201 Argonne Dr.
Baltimore, MD, 21251
(O) (443) 885-4336
(F) (443) 885-8303
(W) www.murphyfineartscenter.org



2 attachments



image001.jpg
7K

Morgan Application Reduced File.pdf
703K

A-305

Exhibit KK

LETTER

Letter to CEO of Ticketmaster, re "Saviours' Day" Event

Published: 02.09.2023

To Michael Rapino, CEO, Ticketmaster:

As you may know, ADL (the Anti-Defamation League) is a leading anti-hate organization founded in 1913 with a mission to stop the defamation of the Jewish people and secure justice and fair treatment to all. ADL has been recently made aware that Ticketmaster is selling tickets to the Nation of Islam's "Saviours' Day" event scheduled for February 26th, 2023. The event is set to be held at the Wintrust Arena in Chicago and headlined by Louis Farrakhan, the Nation of Islam's longtime leader and one of the most notorious antisemites in the country.

While we are not requesting any particular action from your company as it relates to your commercial activities, we would like to make you aware of Farrakhan's past behavior and statements in relation to multiple protected categories of individuals, including people of the Jewish faith and LGBTQ+ individuals. A few examples include Farrakhan referring to Jews as "termites" and "satanic," members of the LGBTQ+ community as "degenerates," and claiming that homosexuality is not natural but rather has been "produced through chemistry." He has also denied the magnitude of the Holocaust and diminished its effect, and has blamed Jews for its occurrence.

It is important to note that the Nation of Islam's annual Saviours' Day event regularly serves as a platform to amplify this [hate](#) and [bigotry](#), not only from Farrakhan, but from extremists and conspiracy theorists who are often invited as guest speakers, including prominent [Holocaust deniers](#) and leading voices in the 9/11 "truther" movement. Some of Farrakhan's statements at past Saviours' Day events include the following:

- "Pedophilia and sexual perversion institutionalized in Hollywood and the entertainment industries can be traced to Talmudic principles and Jewish influence... The wicked practices that govern their industries are largely justified and influenced by such Talmudic principles." – Louis Farrakhan, Saviours' Day 2019
- "Those who call themselves 'Jews,' who are not really Jews, but are in fact Satan. You should learn to call them by their real name: 'Satan.' You are coming face-to-face with Satan, the Arch Deceiver, the enemy of God and the enemy of the Righteous." – Louis Farrakhan, Saviours' Day 2017
- "There were many Israelis and Zionist Jews in key roles in the 9/11 attacks...It now appears that 9/11 was a false flag operation." – Louis Farrakhan, Saviours' Day 2015
- "These false Jews promote the filth of Hollywood that is seeding the American people and the people of the world and bringing you down in moral strength. It's the wicked Jews, the false Jews that are promoting lesbianism, homosexuality." – Louis Farrakhan, Saviours' Day 2006
- "You are wicked deceivers of the American people. You have sucked their blood. You are not real Jews...You are the synagogue of Satan, and you have wrapped your tentacles around the U.S. government, and you are deceiving and sending this nation to hell." – Louis Farrakhan, Saviours' Day 1996

You can learn more about [Louis Farrakhan](#) and the [Nation of Islam](#) on our website.

Sincerely,

Jonathan Greenblatt
CEO and National Director

A-308

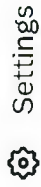
2/11/23, 11:40 AM Case 1:23-cv-09110-DLC Document 72-40 Filed 01/06/24 Page 4 of 4

ADL (Anti-Defamation League)

A-309

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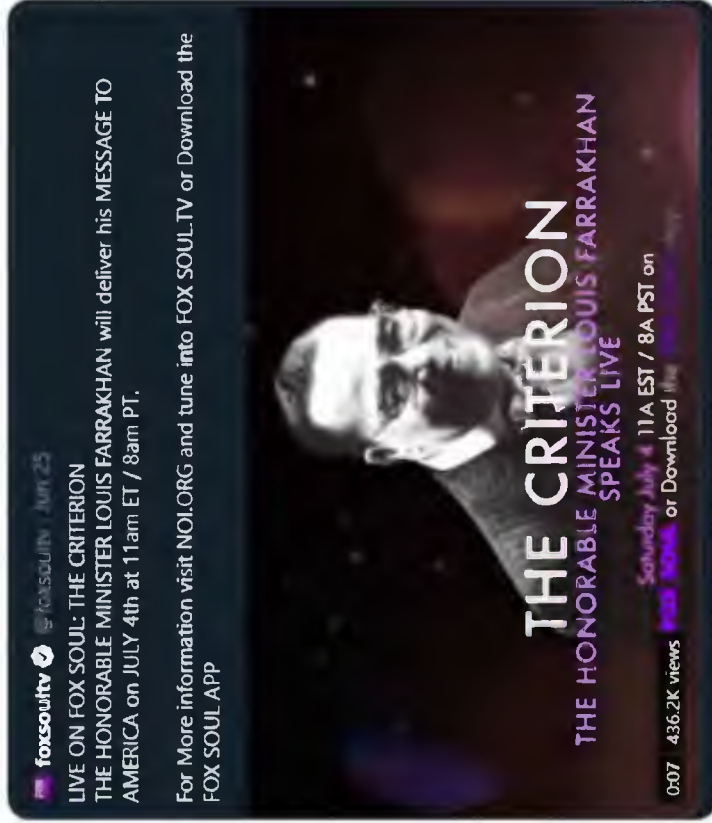
Exhibit OO



Jonathan Greenblatt
@JGreenblattADL

...

Louis Farrakhan, a notorious #antisemite & #homophobe, inexplicably continues to get airtime. He repeatedly elevates hateful conspiracies. He has called Jews "termmites" and the #LGBTQ+ community "degenerates." He deserves condemnation, not exposure.



11:12 AM · Jun 29, 2020

127 Reposts 31 Quotes 403 Likes 3 Bookmarks



Case 1:23-cv-09110-DKC Document 72-46 Filed 01/06/24 Page 3 of 4



Settings



Oliver Darcy
@olivedarcy

...

After being called out by the Anti-Defamation League and others, Fox Soul says it will air a program "featuring a compilation of the most powerful speeches from the greatest black leaders and thinkers" instead of the "previously scheduled" airing of Farrakhan's July 4th address. twitter.com/foxsoulty/stat...

This post is unavailable.

2:46 PM · Jun 29, 2020

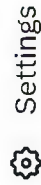
26 Reposts 18 Quotes 107 Likes 1 Bookmark



A-312




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 **Jonathan Greenblatt** ✓
@JGreenblattADL

...

Thanks to [@FOXSouITV](#) for listening to [@ADL](#)'s request. Hate should have no place on broadcast, in print or on social media. Period.

 **Oliver Darcy** @oliverdarcy · Jun 29, 2020

After being called out by the Anti-Defamation League and others, Fox Soul says it will air a program "featuring a compilation of the most powerful speeches from the greatest black leaders and thinkers" instead of the "previously scheduled" airing of Farrakhan's July 4th address.
twitter.com/foxsoultv/stat...

3:06 PM · Jun 29, 2020

23 Reposts 3 Quotes 86 Likes



A-313

Exhibit PP

A-314

Case 1:23-cv-09110-DLC Document 72-47 Filed 01/06/24 Page 2 of 5

From: arifmuhammadgc@aol.com
Subject:

Date: Jul 17, 2020 at 8:15:04 AM
To: michael@muhammadlawfirm.com

As-Salaam Alaikum;

Brother Michael;

Please see the below, it's LEGAL, let's discuss.

Thank you
Brother Arif

-----Original Message-----

From: Ahmad Muhammad <ahmadfm@noicouncil.org>
To: Arif Muhammad <arifmuhammadgc@aol.com>
Sent: Thu, Jul 16, 2020 5:58 pm
Subject: Fwd: [Vimeo Support] Update: Vimeo - Unable to access videos.

Thank you,
Ahmad Muhammad

Begin forwarded message:

From: "Barnar@gmail.com" <barnar@gmail.com>
Date: July 16, 2020 at 5:07:29 PM CDT
To: Ahmad Muhammad <ahmadfm@noicouncil.org>
Subject: FW: [Vimeo Support] Update: Vimeo - Unable to access videos.

From: Livestream <support@livestream.zendesk.com>
Sent: Thursday, July 16, 2020 5:36 PM
Cc: Justice or Else! <barnar@gmail.com>
Subject: [Vimeo Support] Update: Vimeo - Unable to access videos.

no-reply@vimeo.com



The logo for Vimeo, featuring the word "vimeo" in a lowercase, bold, sans-serif font. Above the text is a horizontal bar composed of several colored segments: blue, green, yellow, orange, red, purple, and blue.

000714

A-315

Case 1:23-cv-09110-DLC Document 72-47 Filed 01/06/24 Page 3 of 5

You are registered as a CC on this support request ([6832255](#)). Reply to this email to add a comment to the request.

Scott T. (Livestream)

Hi,

Your account was terminated for violating Vimeo's Terms of Service (<https://vimeo.com/terms>) and Community Guidelines (<https://vimeo.com/help/guidelines>).

We don't allow videos that are hateful, harass others, or include defamatory or discriminatory speech. We also do not allow videos that convey false or misleading health-related information that has a serious potential to cause public harm, or videos that claim mass tragedies are hoaxes or false flag operations.

Specifically, Vimeo moderators will remove content that:

- * Makes derogatory or inflammatory statements about individuals or groups of people
- * Are intended to harm someone's reputation
- * Are malicious
- * Use coded or veiled language to attack a particular group like an ethnic or religious minority
- * Claims that Coronavirus is a hoax or promotes various other conspiracy theories around the virus

We sent a warning about these kinds of violations back in February, as well as removed a number of videos that were in violation. We fully detailed our policies, and granted an opportunity to remove all existing violations and refrain from uploading this content in the future.

The most recent violations included: vimeo.com/437424144, vimeo.com/434795624, vimeo.com/435533415, vimeo.com/435514928, and vimeo.com/436292917

These videos made statements:

- Accusing Bill & Melinda Gates of wanting to “depopulate the earth”, in the context of

000715

A-316

Case 1:23-cv-09110-DLC Document 72-47 Filed 01/06/24 Page 4 of 5

COVID-19

- “When the white man was made, his father was a liar, his father was a murderer, so they’re born with lie and murder in their nature”
- Referred to Jews as 'Satan', 'Enemy of God', 'Imposters', and 'Deceivers'

Additionally, the ADL (a widely regarded authority on hate) recently published this article: <https://www.adl.org/blog/farrakhan-remains-most-popular-antisemite-in-america>.

Given the nature of the continued violations in the account, this has been terminated.

We wish you the best of luck finding a platform better suited to your needs.

Sincerely,
Scott T.
Trust & Safety Manager

Andrew C (Livestream)

Hello Barnar,
I appreciate your patience. I've contacted Gabbie and other teams internally to check the status of your account. I will update you as soon as possible.
Sincerely,
Andrew C.

000716

A-317

Case 1:23-cv-09110-DLC Document 72-47 Filed 01/06/24 Page 5 of 5

[R5GDLW-4WKW]

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error, please notify the system manager. This message contains confidential information and is intended only for the individual named. If you are not the named addressee, you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. If you are not the intended recipient, you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.

Nation of Islam | Ministry of Information

000717

A-318

Exhibit QQ



ADL'S COMBAT Antisemitism Plan

In recent years, Jews and Jewish institutions have been targets of antisemitism with increasing frequency. Despite our best efforts to counteract this trend, antisemitism in the U.S. has significantly worsened: 2021 was the highest year on record for antisemitic incidents, a 34 percent increase from the number of incidents recorded in 2020 and the highest year on record since ADL began tracking antisemitic incidents in 1979. This included a significant spike during the conflict between Israel and Hamas in May 2021, when antisemitic incidents in the U.S. increased by 138 percent. The first six months of 2022 have witnessed more attacks, including a synagogue hostage crisis in Colleyville, Texas, and an antisemitic “Mapping Project” targeting the Jewish community in Boston.

Antisemitism manifests in action, rhetoric, and attitudes from the far right and the extreme left; from political leaders and candidates; from anti-Zionists, neo-Nazis, and QAnon conspiracies. It also manifests within systems, structures, institutions, policies, cultural norms, and social dynamics—the very fabric of civilization. While common themes persist through the centuries, antisemitism evolves and mutates to meet the anxieties and crises of the time, changing to continually place Jews as a—or the—central evil and scapegoat. Antisemitism is not only a danger to vulnerable individuals and communities, but it is corrosive to democracy and an agent in dividing marginalized communities against one another.

Often called the “oldest hatred,” antisemitism’s persistence, perniciousness, and complexity make addressing it exceedingly difficult.

ADL’s COMBAT plan is a comprehensive, six-part advocacy framework to fight antisemitism:

- Condemn Antisemitism
- Oppose Hate and Extremism Driven by Antisemitism
- Make Communities Safe from Antisemitism
- Block Antisemitism Online
- Act Against Global Antisemitism
- Teach about Antisemitism

In summary, the COMBAT plan calls on advocacy at the federal, state, and local levels, as well as with public officials and all other leaders in positions of authority, to:

- Call out with moral clarity all forms of antisemitism, including anti-Zionism, and lead unequivocally in responding whenever it appears.
- Support and improve hate crime laws, including better data collection and reporting, and adopt ADL’s PROTECT plan against antisemitic domestic extremists.
- Protect targeted communities, including Jewish institutions and Jews in colleges and universities.
- Adopt ADL’s REPAIR plan to stop the spread of antisemitism online.
- Demonstrate ongoing leadership on the world stage by confronting global antisemitism.
- Teach about antisemitism and understanding of Jewish people today.



This is meant to be complementary to the ADL’s [PROTECT](#) plan to fight extremism and the [REPAIR](#) plan to address online hate. ADL is mobilizing its full resources and capacities in pursuit of these comprehensive policy agendas on the international, national, state, and local levels.

ADL’s COMBAT plan is a blueprint for transformational change targeting antisemitism and all other forms of hate. It offers a wide-ranging path forward for meaningful change and, in the words of ADL’s mission statement “to stop the defamation of the Jewish people, and to secure justice and fair treatment to all.” We must live up to our nation’s constitutional aspirations as a country where freedom and safety remain a cornerstone of our democracy.



CONDEMN ANTISEMITISM

- **Condemn all forms of antisemitism, and respond to antisemitic incidents, in timely, specific, and direct ways.**
 - Public officials and all other leaders in positions of authority should:
 1. Utilize their standing, platform, and convening power to condemn antisemitism and its multifaceted manifestations, regardless of source, ideology, or political affiliation.
 2. Deplore explicit expressions and actions demonizing, delegitimizing, and isolating Israel and Zionists.
 - Such manifestations are evident when antisemitic tropes are invoked, when the Jewish right to self-determination is demonized or rejected (i.e., when Zionism is negated or delegitimized), and when Jews collectively or individually are held accountable for Israel’s actions.
 - Extreme rhetoric related to Israel, including the use of terms such as “apartheid” and “genocide,” can create environments that embolden antisemitic actions.
 - Jews, the vast majority of whom consider a connection to Israel a part of their Jewish identity, should not be disenfranchised, disparaged, punished, or subject to a “litmus test” related to the actions of Israel.
 3. Refrain from politicizing or trivializing the memory of the Holocaust to comment on societal situations.
 4. Oppose any efforts intended to use antisemitism as a tool for political gain and partisan warfare.
 5. Challenge discriminatory efforts to exclude Jews (whether implicitly or explicitly) from political coalitions or public activities, public accommodations, economic activities, or government-funded services.



- **Challenge antisemitism in the United States via a whole-of-government strategy.**
 - Federal, state, and local governments should:
 1. Establish executive-led interagency task forces and create whole-of-government strategic plans for combating antisemitism.
 2. Expand agency portfolios and expertise to address antisemitism, particularly within existing civil rights offices.
 3. Eradicate antisemitic tropes from government dynamics, such as security clearance processes (i.e., “dual loyalty” suspicion of Jews with connections to Israel), budgetary, law enforcement, electoral, and other impacts throughout different agencies and departments of government.
 4. Incorporate antisemitism education and training in government, as part of Diversity, Equity, and Inclusion (DEI) efforts and other anti-bias initiatives.

- **Adopt the International Holocaust Remembrance Alliance (IHRA) Working Definition of Antisemitism.**
 - Federal, state, and local governments should adopt and utilize the IHRA Working Definition of Antisemitism as a non-legally binding tool for understanding antisemitism and identifying its modern-day manifestations.



OPPOSE HATE AND EXTREMISM DRIVEN BY ANTISEMITISM

- **Support hate crime laws and improve hate crime data collection and reporting.**
 - Federal, state, and local governments should:
 1. Expand policies, procedures, response, training, and assistance to improve the policing and prosecution of hate crimes.
 2. Make hate crime reporting mandatory by all law enforcement agencies.
 3. Improve hate crimes data collection efforts facilitated by the internet.
 4. Increase hate crimes training and institute programs to build stronger relationships with impacted communities to improve the investigation and response to such crimes.
 5. Expand hate crime data reporting to include bias incidents from civilian government agencies like state or local Human Rights Commission.

- **Adopt wide-ranging measures to combat all forms of domestic antisemitic violent extremism, most notably the array of policy recommendations outlined in [ADL’s PROTECT plan](#).**



M

MAKE INSTITUTIONS SAFE FROM ANTISEMITISM

- **Protect the physical security of Jewish community institutions.**
 - The U.S. government should enact H.R. 6825, the Nonprofit Security Grant Program Improvement Act, and S. 2123, the Pray Safe Act.
 - State and local governments should:
 1. Invest in programs supporting physical security enhancements and activities to protect community institutions.
 2. Train and educate on community diversity to avoid bias about who Jews are, racial profiling in the name of protecting the community, and to ensure that security measures do not endanger Jews of Color.
- **Safeguard Jewish students in post-secondary institutions.**
 - The Federal government should enact into law Executive Order (EO) 13899 on Combating Anti-Semitism enforcing Title VI of the Civil Rights Act of 1964 against prohibited discrimination rooted in antisemitism.
 - The U.S. Department of Education's Office for Civil Rights (OCR) should:
 1. Promptly complete investigations of Title VI complaints relating to antisemitism and other instances of discrimination in higher education.
 2. Provide technical assistance regarding campus antisemitism through the Outreach, Prevention, Education & Nondiscrimination (OPEN) Center and directly to colleges, universities, Jewish students, and Jewish faculty about civil rights protections afforded to Jewish students under federal civil rights.
 - Federal and state Departments of Education and post-secondary institutions should rigorously enforce existing anti-discrimination policies and ensure that appropriate disciplinary measures are employed against individuals and institutions when appropriate.

B

BLOCK ANTISEMITISM ONLINE

- **Adopt whole-of-government measures to combat all forms of online antisemitism, as delineated in ADL's [REPAIR plan](#).**

A

ACT AGAINST GLOBAL ANTISEMITISM

- **Strengthen the Office of the U.S. Special Envoy to Monitor and Combat Antisemitism.**
 - Increase staff and program budgets, and civil service full-time employees to add needed capacity and cushion against the absence of leadership during presidential transitions.
- **Amplify intergovernmental cooperation between the U.S. and foreign governments to fight global antisemitism and specific regional manifestations.**
 - The U.S. government should:



1. Encourage governments to better address antisemitism, especially in areas where Jewish communities face acute and ongoing threats to their physical security due to antisemitism, such as in Europe and Latin America.
 2. Work with global leaders to address the proliferation of antisemitism in state-run media. This is especially prevalent in certain Middle Eastern countries, where Israel is delegitimized, and Jews maligned.
 3. Counter efforts to ban or unduly restrict fundamental rites of Judaism and Jewish life such as *shechita* (kosher animal slaughter) and *brit milah* (newborn male circumcision.)
 4. Use appropriate intergovernmental fora and international organizations to promote legislative, judicial, and educational actions to fight antisemitism, and to encourage the improvement of data collection on antisemitic hate crimes.
 5. Ensure that international organizations like the United Nations address the issue of antisemitism and anti-Israel bias in their bodies and include protecting Jews in their anti-discrimination efforts.
- **Counter state-sponsored antisemitism and related terrorism.**
 - The U.S. government should:
 1. Fight the spread of global terrorism, including all terrorist organizations which include anti-Jewish hate as part of their guiding ideology and the states that sponsor them.
 2. Confront state-sponsored antisemitism, including Iran's worldwide promotion of antisemitic content and its terrorist activities targeting global Jewish communities.
 3. Devise a comprehensive strategy to curtail the damage caused by Iran's state-sponsorship of antisemitic propaganda and networks, including the Islamic Revolutionary Guard Corps (IRGC) and IRGC Qods Force; ensure the IRGC remains on the U.S. government's Foreign Terrorist Organization (FTO) list.
 4. Encourage countries around the world to act against terrorist groups and their support networks driven by antisemitic ideologies, including Hamas, Hezbollah, Islamic Jihad, white supremacists, and others.
 - **Mobilize against the Boycott, Divestment, and Sanctions (BDS) campaign and other efforts to demonize, delegitimize and isolate Israel in international fora.**
 - States should enact constitutionally viable anti-BDS legislative proposals that preclude unlawful discrimination.
 - Government officials should publicly repudiate reports and statements by governments and NGOs that demonize Israel and question its legitimacy as a Jewish state and be clear about the reasons for that rejection.



T

TEACH ABOUT ANTISEMITISM

- **Promote understanding of Jewish people today.**
 - The federal government should:
 1. Strengthen the Office of the U.S. Special Envoy for Holocaust Issues.
 2. Support, elevate and augment global Holocaust education and awareness initiatives, including partners in the Abraham Accords.
 - Federal and state governments should:
 1. Provide incentives to teach about antisemitism using proven programming, such as ADL's Echoes and Reflections and BINAH.
 2. Research the history, causes, and responses to antisemitism through grant-making to research centers, such as ADL's Center on Antisemitism Research.
 3. Educate about the ways antisemitism rends the social fabric, including by fomenting other anti-social phenomena like racism, sexism, xenophobia, and other forms of discrimination, and the corrosive threat antisemitism poses to democracy
 - State governments should institute age-appropriate Holocaust education as part of their curricula and provide the means for school districts to deliver such education.
- **Include antisemitism in anti-bias education and related training.**
 - Federal and state governments should support and fund inclusive school anti-bias education, civics education, and other hate prevention programs that include antisemitism.

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Exhibit RR



GOVERNOR
KATHY HOCHUL

 [Education \(/keywords/education\)](/keywords/education)

 [History \(/keywords/history\)](/keywords/history)

 [Public Safety \(/keywords/public-safety\)](/keywords/public-safety)

SEPTEMBER 19, 2023 | Albany, NY

Governor Hochul Announces Comprehensive State Action to Combat Antisemitism

State Anti-Hate in Education Center and Annual Convening Will Partner with Institutions and Organizations to Combat Hate and Focus on Antisemitism

State Division of Human Rights Will Take Action to Improve Hate and Bias Incident Data Collection

Office of Victim Services to Expand Support for Victims of Antisemitism by Simplifying the Victim Compensation Application

Re-Launch of NYS Police Law Enforcement Focused on Hate Crime Investigative Seminars

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Office of Mental Health Creates Campaign to Recognize Unique Issues Surrounding Jewish Americans' Mental Health

[Traducción al español](#)

Governor Kathy Hochul today announced comprehensive state action taken to fight antisemitism. Governor Hochul made the announcement at the Center for Jewish History, making New York State the first state to respond to President Biden's national strategy to counter antisemitism. The Governor also announced the creation of the New York State Anti-Hate in Education Center and Annual Convening that will combat hate, create a safe and inclusive environment, and focus on eliminating antisemitism. Further, the Division of Human Rights has announced plans to improve hate and bias incident data collection and launch the agency's first-ever small grants program for community anti-bias work. The Office of Victim Services is working to expand support for victims of antisemitism by simplifying the Victim Compensation Application, allowing them access to reimbursement. Additionally, the New York State Police will re-launch law enforcement focused Hate Crime Investigative Seminars. The New York State Office of Mental Health created the Spotlight on Jewish Campaign to recognize the unique issues surrounding Jewish Americans' mental health.

"As Governor of the State with the largest Jewish population outside the State of Israel, I feel a solemn responsibility to protect and uplift New York's vibrant, diverse Jewish communities," Governor Hochul said. "No one should have to fear for their safety while going to their place of work, going to school, or just walking the streets. It has always been my top priority to keep the people of New York safe, and we will continue taking action to fight antisemitism and use every tool at our disposal to eliminate hate and bias from our communities."

"New York has long been a leader when it comes to diversity, inclusion, and tolerance," said Lieutenant Governor Delgado. "We are proud to continue that legacy by becoming the first state in the nation to respond to President Biden's national strategy to combat antisemitism and root out hate. We will lead with love and build stronger, safer, and more inclusive communities in the process."

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AUDIO

PHOTOS

New York State Anti-Hate in Education Center & Annual Convening

Governor Hochul recognizes the importance of harnessing New York State's collective knowledge and expertise to combat hate in 2023. The Governor's Office will establish the New York State Anti-Hate in Education Center, which will bring together stakeholders, as a working group, from a range of partner institutions and organizations, including The City University of New York, The State University of New York, the New York State Education Department, and The Commission on Independent Colleges and Universities (CICU) in order to combat hate, create a more safe, inclusive, and equitable climate for all New Yorkers.

During the next year, the focus of the New York State Anti-Hate Center and its inaugural Annual Convening, scheduled for Summer 2024, will be antisemitism. The Center will wrestle with additional hate issues on a rotating basis. One of the first objectives of the center is to define hate and its impact on education. The goal is for the center to address the interconnectedness of hate and then take a deep dive into the specific manifestations of hate on a rotating basis and how it can be addressed through education.

The New York State Anti-Hate in Education Center & Annual Convening will:

- Serve as an intellectual hub that brings together experts in academia and government to analyze, research, and brainstorm solutions to complex hate and discrimination issues;
- Build alliances across partner institutions and organizations, fostering collaborative efforts to identify opportunities for collective action;
- Develop education and training for a range of stakeholders across New York State;
- Make recommendations about effective and equitable policies to combat hate crimes and discrimination;
- Articulate strategies for evaluating the effectiveness of anti-hate initiatives.

New York State Division of Human Rights

The New York State Division of Human Rights (DHR) today announced plans to improve hate and bias incident data collection around the state. DHR's Hate and Bias Prevention Unit will launch a dedicated reporting hotline and will work with their regional hate and bias prevention councils to promote this resource within communities statewide, with the goal of seeing improved data collection which can inform the agency's continued hate and bias prevention work going forward.

DHR also today announced plans for its Hate and Bias Prevention Unit to establish a first-of-its-kind small grant program aimed at supporting community-based organizations engaged in vital grassroots anti-hate and bias work. These grants will be available to fund a variety of community-based anti-hate and bias initiatives, including but not limited to public awareness and education campaigns, training programs, workshops, and community support interventions in the wake of hate or bias incidents. Additional information about this small grant program, including when applications will open and how organizations can apply, will be made available in the coming months.

New York State Office of Victim Services

The Office of Victim Services also is working to streamline its application for victim compensation, which will help victims of antisemitic and other crimes, apply for financial assistance for crime-related expenses. OVS provides a critical financial safety net for individuals who have no other resources. New York State has enacted more than a dozen laws expanding eligibility for compensation of hate crimes and other crimes, including allowing reimbursement to certain crime victims even if they are not injured and increasing compensation for essential lost or damaged personal property from \$500 to \$2,500. Individuals seeking help with compensation applications, programs in their communities, or other services for victims and survivors may visit www.ovs.ny.gov/connect.

New York State Division of Criminal Justice Services

The New York State Division of Criminal Justice Services administers the Securing Communities Against Hate Crimes Program to provide funding to strengthen security measures and prevent hate crimes against nonprofit community and civic centers, cultural museums, day care centers, and other nonprofit organizations that may be vulnerable because of their ideology, beliefs, or mission. This funding can be used to support exterior or interior security improvements, such as lighting, locks, alarms, panic buttons, fencing, barriers, access controls, shatter-resistant glass and blast-resistant film, public address systems, and measures to strengthen cybersecurity. Funds can also cover costs associated with security training. DCJS

has awarded funding to 497 organizations statewide for 1,081 projects totaling \$51,680,910, with \$8,899,091 going toward 187 cybersecurity projects this summer. The FY 2024 Enacted Budget provides an additional \$25 million for Securing Communities Against Hate Crimes grants. The next round of grant funding is expected to be made available through a request for applications in December 2023.

"It has always been my top priority to keep the people of New York safe, and we will continue taking action to fight antisemitism and use every tool at our disposal to eliminate hate and bias from our communities."

Governor Kathy Hochul

New York State Division of Homeland Security and Emergency Services

The New York State Division of Homeland Security and Emergency Services [announced today](#) nearly \$38 million will be distributed to nonprofit organizations throughout the state facing an increased risk of terrorism and violent extremist attacks. Funding is made available through FEMA's Nonprofit Security Grant Program, which helps strengthen the security and preparedness of religious nonprofits throughout the country. New York leads the nation in total funding and the number of awardees, most of which are Jewish organizations.

New York State Police

New York State Police are working with the New York State Division of Criminal Justice Services to launch a new series of Hate Crime Investigative Seminars. Previous seminars included presentations from the U.S. Attorney's Office for the Northern District, the FBI, and the Anti-Defamation League.

New York State Office of Mental Health

The New York State Office of Mental Health (OMH) created the [Spotlight on Jewish Americans Campaign](#) to recognize the unique issues surrounding Jewish Americans' Mental Health and provide resources to develop a webinar to the existing equity series that will preface cultural

and religious considerations, address antisemitism and its effects, and provide best-practice approaches in the provision of behavioral health services for this community.

New York State Education Commissioner Betty A. Rosa said, “Education can be a powerful antidote to hate by fostering empathy, understanding, and critical thinking skills. We are all lifelong learners, and when we’re exposed to diverse perspectives and histories, it cultivates an environment of tolerance and acceptance, ultimately dismantling prejudice and intolerance. I firmly believe that we must address incivility head-on through respect and a desire to understand each other as a way of supporting our communities and shared values.”

SUNY Chancellor John B. King, Jr. said, “Hate has no home in New York State. SUNY is and always will be a place of welcome for all students, faculty, and staff, and we are proud to lend our expertise and our voice to this important initiative. I thank Governor Hochul for her commitment to combating antisemitism and other forms of hate in New York State.”

CUNY Chancellor Félix V. Matos Rodríguez said, “CUNY is committed to combatting antisemitism and ensuring a sense of safety, well-being and belonging for all New Yorkers. The New York State Anti-Hate in Education Center will help us to better leverage CUNY’s expertise and build on our extensive ongoing efforts to fight antisemitism and hatred in all forms. We thank Governor Hochul for her leadership in initiating this comprehensive and important action, which mobilizes the State’s full capacities and provides clear unity of purpose to counter a pervasive and damaging global threat.”

Ted Deutch, AJC CEO, Edward and Sandra Meyer Office of the CEO said, “American Jewish Committee (AJC) is proud to partner with my friend and former colleague Governor Kathy Hochul on New York’s comprehensive State Action to Combat Antisemitism. We look forward to working with the Governor and the many other Jewish organizations engaged in this vital work to help New York be the first state to implement the U.S. National Strategy to Counter Antisemitism. Two million Jews call New York state their home – one in 10 New Yorkers is Jewish. Together, with the Governor’s rollout of these new and renewed efforts, we will protect the Jewish community.”

Eric S. Goldstein, CEO, UJA-Federation of New York said, “We are grateful to Governor Hochul for her commitment to advancing policies recommended in the first U.S. National Strategy to Counter Antisemitism. New York is home to the largest Jewish community outside Israel, and this public pronouncement of support and targeted resources will undoubtedly encourage other states to follow Governor’s Hochul’s lead.”

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Noam Gilboord, Interim CEO, JCRC of New York said, "Regrettably, incidents targeting the Jewish community account for nearly half of all the hate crimes in New York City. JCRC-NY has long advocated for anti-hate education initiatives, increased efforts to collect bias incident data, and special trainings for law enforcement as tools to ensure the safety and security of all New Yorkers. To this end, JCRC-NY, together with UJA-Federation of New York, founded the Community Security Initiative, which works with public officials and law enforcement to enhance the security infrastructure of our diverse Jewish communities. We applaud Governor Kathy Hochul on taking these concrete steps to combat the anti-Jewish hatred and ensure the full inclusion of the Jewish community in the State of New York."

Contact the Governor's Press Office

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Translations

	Arabic Translation الترجمة إلى العربية	https://www.governor.ny.gov/sites/default/files/2009/09/19.23.reI_.ANTISEMITISM_Arabic.pdf
	Bengali Translation বাংলা অনুবাদ	https://www.governor.ny.gov/sites/default/files/2009/09/19.23.reI_.ANTISEMITISM_Bengali.pdf
	Chinese Translation 中文翻譯	https://www.governor.ny.gov/sites/default/files/2009/09/19.23.reI_.ANTISEMITISM_Chinese.pdf
	French Translation Traduction en français	https://www.governor.ny.gov/sites/default/files/2009/09/19.23.reI_.ANTISEMITISM_French.pdf
	Haitian-Creole Translation Tradiksyon kreyòl ayisyen	https://www.governor.ny.gov/sites/default/files/2009/09/19.23.reI_.ANTISEMITISM_HaitianCreole.pdf

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Exhibit SS

Who We Are

ADL is the leading anti-hate organization in the world. Founded in 1913, its timeless mission is “to stop the defamation of the Jewish people and to secure justice and fair treatment to all.” Today ADL continues to fight all forms of antisemitism and bias, using innovation and partnerships to drive impact. A global leader in combating antisemitism, countering extremism and battling bigotry wherever and whenever it happens, ADL works to protect democracy and ensure a just and inclusive society for all.

Our Values

Our values guide our internal culture and shape the approach we take to our programs and initiatives externally. Confronting antisemitism, our founders established ADL based on their Jewish values. We build on their legacy as we speak out on behalf of all marginalized communities across the country and around the globe.

Courage

We have the courage to speak out against antisemitism, extremism, hate and bigotry, discrimination and injustice—even when we stand alone.

Inclusion

We are committed to inclusion, ensuring that all people are respected and appreciated as valuable members of our community.

There is a newer version of the New York Laws



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2021 New York Laws

CPL - Criminal Procedure

Part 1 - General Provisions

Title A - Short Title, Applicability and Definitions

Article 2 - Peace Officers

2.20 - Powers of Peace Officers.

Universal Citation: NY Crim Pro L § 2.20 (2021)

§ 2.20 Powers of peace officers. 1. The persons designated in section 2.10 of this article shall have the following powers:

(a) The power to make warrantless arrests pursuant to section 140.25 of this chapter.

(b) The power to use physical force and deadly physical force in making an arrest or preventing an escape pursuant to section 35.30 of the penal law.

(c) The power to carry out warrantless searches whenever such searches are constitutionally permissible and acting pursuant to their special duties.

(d) The power to issue appearance tickets pursuant to subdivision three of section 150.20 of this chapter, when acting pursuant to their special duties. New York city special patrolmen shall have the power to issue an appearance ticket only when it is pursuant to rules and regulations of the police commissioner of the city of New York.

(e) The power to issue uniform appearance tickets pursuant to article twenty-seven of the parks, recreation and historic preservation law and to issue simplified traffic informations pursuant to section 100.25 of this chapter and section two hundred seven of the vehicle and traffic law whenever acting pursuant to their special duties.

(f) The power to issue a uniform navigation summons and/or complaint pursuant to section nineteen of the navigation law whenever acting pursuant to their special duties.

(g) The power to issue uniform appearance tickets pursuant to article seventy-one of the environmental conservation law, whenever acting pursuant to their special duties.

(h) The power to possess and take custody of firearms not owned by the peace officer, for the purpose of disposing, guarding, or any other lawful purpose, consistent with his duties as a peace officer.

(i) Any other power which a particular peace officer is otherwise authorized to exercise by any general, special or local law or charter whenever acting pursuant to his special duties, provided such power is not inconsistent with the provisions of the penal law or this chapter.

(j) Uniformed court officers shall have the power to issue traffic summonses and complaints for parking, standing, or stopping violations pursuant to the vehicle and traffic law whenever acting pursuant to their special duties. 2. For the purposes of this section a peace officer acts pursuant to his special duties when he performs the duties of his office, pursuant to the specialized nature of his particular employment, whereby he is required or authorized to enforce any general, special or local law or charter, rule, regulation, judgment or order. 3. A peace officer, whether or not acting pursuant to his special duties, who lawfully exercises any of the powers conferred upon him pursuant to this section,

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shall be deemed to be acting within the scope of his public employment for purposes of defense and indemnification rights and benefits that he may be otherwise entitled to under the provisions of section fifty-k of the general municipal law, section seventeen or eighteen of the public officers law, or any other applicable section of law.

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2022 New York Laws

CPL - Criminal Procedure

Part 1 - General Provisions

Title A - Short Title, Applicability and Definitions

Article 2 - Peace Officers

2.30 - Training Requirements for Peace Officers.

Universal Citation: NY Crim Pro L § 2.30 (2022)

§ 2.30 Training requirements for peace officers. 1. Every peace officer in the state of New York must successfully complete a training program, a portion of which shall be prescribed by the municipal police training council and a portion of which shall be prescribed by his or her employer. The portion prescribed by the municipal police training council shall be comprised of subjects, and the hours each is to be taught, that shall be required of all types or classes of peace officers. The hours of instruction required by the municipal police training council shall not exceed one hundred eighty, unless a greater amount is either required by law or regulation, or is requested by the employer. The segment prescribed by the employer for its employees shall be comprised of subjects, and the hours each is to be taught, relating to the special nature of the duties of the peace officers employed by it provided,

however, that when the subjects prescribed by the employer are identical to the subjects in the training program required by the municipal police training council, the employer shall not be required to provide duplicate training for those subjects. 2. Each state or local agency, unit of local government, state or local commission, or public authority, or public or private organization which employs peace officers shall provide the training mandated by this section, the cost of which will be borne by the employer. Each peace officer satisfactorily completing the course prescribed by the municipal police training council shall be awarded a certificate by the division of criminal justice services attesting to that effect, and no person appointed as a peace officer shall exercise the powers of a peace officer, unless he or she has received such certification within twelve months of appointment. 3. No employer shall allow any peace officer it employs to carry or use a weapon during any phase of the officer's official duties, which constitutes on-duty employment, unless the officer has satisfactorily completed a course of training approved by the municipal police training council in the use of deadly physical force and firearms and other weapons, and annually receives instruction in deadly physical force and the use of firearms and other weapons as approved by the municipal police training council. 4. Upon the failure or refusal to comply with the requirements of this section, the commissioner of the division of criminal justice services shall apply to the supreme court for an order directed to the person responsible requiring compliance. Upon such application, the court may issue such order as may be just, and a failure to comply with the order of the court shall be a contempt of court and punishable as such. 5. Every employer of peace officers shall report to the division of criminal justice services, in such form and at such time as the division may by regulation require, the names of all peace officers who have satisfactorily completed any of the training requirements prescribed by this section. 6. A certificate attesting to satisfactory completion of the training requirements imposed under this section awarded to any peace officer by the executive director of the municipal police training council pursuant to this section shall remain valid:

(a) during the holder's continuous service as a peace officer; and

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(b) for two years after the date of the commencement of an interruption in such service where the holder had, immediately prior to such interruption, served as a peace officer for less than two consecutive years; or

(c) for four years after the date of the commencement of an interruption in such service where the holder had, immediately prior to such interruption, served as a peace officer for two consecutive years or longer. As used in this subdivision, the term "interruption" shall mean a period of separation from employment as a peace officer by reason of such officer's leave of absence, resignation or removal, other than removal for cause.

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Exhibit UU

NY CLS Penal § 250.00

Current through 2023 released Chapters 1-730

New York Consolidated Laws Service > Penal Law (Pts. ONE — FOUR) > Part THREE Specific Offenses (Titles G — P) > Title N Offenses Against Public Order, Public Sensibilities and the Right to Privacy (Arts. 240 — 250) > Article 250 Offenses Against the Right to Privacy (§§ 250.00 — 250.72)

§ 250.00. Eavesdropping; definitions of terms.

The following definitions are applicable to this article:

1. “Wiretapping” means the intentional overhearing or recording of a telephonic or telegraphic communication by a person other than a sender or receiver thereof, without the consent of either the sender or receiver, by means of any instrument, device or equipment. The normal operation of a telephone or telegraph corporation and the normal use of the services and facilities furnished by such corporation pursuant to its tariffs or necessary to protect the rights or property of said corporation shall not be deemed “wiretapping.”
2. “Mechanical overhearing of a conversation” means the intentional overhearing or recording of a conversation or discussion, without the consent of at least one party thereto, by a person not present thereat, by means of any instrument, device or equipment.
3. “Telephonic communication” means any aural transfer made in whole or in part through the use of facilities for the transmission of communications by the aid of wire, cable or other like connection between the point of origin and the point of reception (including the use of such connection in a switching station) furnished or operated by any person engaged in providing or operating such facilities for the transmission of communications and such term includes any electronic storage of such communications.
4. “Aural transfer” means a transfer containing the human voice at any point between and including the point of origin and the point of reception.
5. “Electronic communication” means any transfer of signs, signals, writing, images, sounds, data, or intelligence of any nature transmitted in whole or in part by a wire, radio, electromagnetic, photoelectronic or photo-optical system, but does not include:
 - (a) any telephonic or telegraphic communication; or
 - (b) any communication made through a tone only paging device; or
 - (c) any communication made through a tracking device consisting of an electronic or mechanical device which permits the tracking of the movement of a person or object; or
 - (d) any communication that is disseminated by the sender through a method of transmission that is configured so that such communication is readily accessible to the general public.

NY CLS Penal § 250.00

6. “Intercepting or accessing of an electronic communication” and “intentionally intercepted or accessed” mean the intentional acquiring, receiving, collecting, overhearing, or recording of an electronic communication, without the consent of the sender or intended receiver thereof, by means of any instrument, device or equipment, except when used by a telephone company in the ordinary course of its business or when necessary to protect the rights or property of such company.
7. “Electronic communication service” means any service which provides to users thereof the ability to send or receive wire or electronic communications.
8. “Unlawfully” means not specifically authorized pursuant to article seven hundred or seven hundred five of the criminal procedure law for the purposes of this section and sections 250.05, 250.10, 250.15, 250.20, 250.25, 250.30 and 250.35 of this article.

History

Add, L 1965, ch 1030, § 1; amd, L 1968, ch 546, § 3; L 1969, ch 1147, § 6; L 1971, ch 1097, § 78; L 1988, ch 744, § 1, eff Dec 22, 1988; [L 2003, ch 69, § 2](#), eff Aug 11, 2003.

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NY CLS Penal § 250.05

Current through 2023 released Chapters 1-730

New York Consolidated Laws Service > Penal Law (Pts. ONE — FOUR) > Part THREE Specific Offenses (Titles G — P) > Title N Offenses Against Public Order, Public Sensibilities and the Right to Privacy (Arts. 240 — 250) > Article 250 Offenses Against the Right to Privacy (§§ 250.00 — 250.72)

§ 250.05. Eavesdropping.

A person is guilty of eavesdropping when he unlawfully engages in wiretapping, mechanical overhearing of a conversation, or intercepting or accessing of an electronic communication.

Eavesdropping is a class E felony.

History

Add, L 1965, ch 1030, § 1, with substance derived from § 738; amd, L 1988, ch 744, § 2, eff Dec 22, 1988.

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NY CLS Penal § 250.10

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New York Consolidated Laws Service > Penal Law (Pts. ONE — FOUR) > Part THREE Specific Offenses (Titles G — P) > Title N Offenses Against Public Order, Public Sensibilities and the Right to Privacy (Arts. 240 — 250) > Article 250 Offenses Against the Right to Privacy (§§ 250.00 — 250.72)

§ 250.10. Possession of eavesdropping devices.

A person is guilty of possession of eavesdropping devices when, under circumstances evincing an intent to use or to permit the same to be used in violation of section 250.05, he possesses any instrument, device or equipment designed for, adapted to or commonly used in wiretapping or mechanical overhearing of a conversation.

Possession of eavesdropping devices is a class A misdemeanor.

History

Add, L 1965, ch 1030, § 1, eff Sept 1, 1967, with substance derived from § 742.

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Exhibit VV-1

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NEWS

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Jonathan Greenblatt's Testimony Before the House Committee on Homeland Security Regarding the Dynamic Terrorism Landscape and What It Means for America

Published: 02.02.2022

Remarks by Jonathan Greenblatt, CEO, ADL

February 02, 2022

ADL CEO Jonathan Greenblatt Testifies on the Dynamic Terrorism Landscap...



February 2, 2022

Mr. Chairman, Ranking Member Katko, Members of the Committee, good morning. I am Jonathan Greenblatt, CEO and National Director of ADL, the Anti-Defamation League, the oldest anti-hate organization in America. It is an honor to appear before you today to address the current terrorism landscape and the dire threat that extremists pose to the United States.

Since 1913, ADL has worked to stop the defamation of the Jewish people and to secure justice and fair treatment to all. We have a world-class team including analysts and investigators who track extremist threats across the ideological spectrum.

Violent domestic extremism is on the rise and threatens all of our communities – and the Jewish community continues to be a primary target of extremists from all sides.

Just two weeks ago in Colleyville, Texas, an Islamist-inspired terrorist fueled by age-old antisemitic conspiracy theories about Jewish power traveled thousands of miles to take four people hostage at gunpoint during a Shabbat service in a pathetic effort to free an Al Qaeda operative who herself repeatedly espoused hateful views about Jews in her public trial.

The crisis in Colleyville was a painful reminder that the threat to the Jewish community in America remains significant and lethal. In fact, ADL has recorded a 115 percent increase in antisemitic incidents from 2015 to 2020. That is an alarming spike by any measure, not to mention the data obscures the human toll: thousands of acts of hateful anti-Jewish harassment and vandalism; hundreds of acts of brutal assault against Jewish people; and at least 18 antisemitic murders that devastated families, shattered communities, and stunned the country.

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In a country riven by political differences, I am sad to report that antisemitism knows no partisan bounds. As I have told this committee in previous hearings, neither side of the spectrum is exempt from intolerance nor above antisemitism. Politicizing the oldest hatred is a tool that we regrettably see from politicians on both sides – and it needs to stop.

We are particularly troubled by the rise of domestic violent extremism, including white supremacists, armed militia groups, accelerationists, sovereign citizens and other groups that demonize the Jewish people. Some of these actors trumpet the “Replacement Theory” that posits that a cabal of Jewish people are seeking to commit “white genocide.” It is frightening to think that this concept has been mainstreamed in recent years yet some prominent conservative voices continue to make outlandish, groundless claims that suggest Jewish philanthropists are seeking to flood America with migrants or other bewildering claims. From Charlottesville to Capitol Hill, this has played out with deadly results.

We also are troubled by the rise of hateful anti-Israel forces that demonize the Jewish state. From pro-Iranian outlets spreading hateful lies on social media to self-described activist groups targeting Jews in public spaces with false accusations of apartheid or genocide. It is frightening to think that this concept has been mainstreamed in recent years as some so-called progressive voices make outlandish, groundless claims that suggest that Zionists are seeking to enslave Palestinian people or other bewildering claims. From Times Square to Colleyville, this has played out with terrifying results.

We can, and we must, do more to prevent tragedies like these from ever happening again.

When I had the honor of appearing before you one year ago, I called for a whole-of-government approach and a whole-of-society strategy to combating domestic

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extremism. We have made progress since then, but so much more needs to be done to truly meet the moment right now.

With that in mind, I again respectfully call on Congress to adopt the principles of PROTECT, ADL's comprehensive, seven-part plan to mitigate the threat posed by domestic terrorism while protecting civil liberties, staying true to American freedoms and values.

ADL's recommendations include: passing the bipartisan Domestic Terrorism Prevention Act... ending the complicity of social media services in facilitating extremism... creating an independent clearinghouse for online extremism content ...and doubling funding for the Nonprofit Security Grant Program.

People should not be risking their lives when they choose to spend Shabbat in a synagogue or shop in a Kosher supermarket or simply living openly as Jews in America. So, yes, we need safety through security – and DHS grants can help – but also through solidarity. We can never build walls that are high enough or fasten our networks tightly enough to ward out all evil. This is why we need all of you and all public figures to call out hate when it happens regardless of the source and why we hope other communities will stand with the Jewish community as we have sought to rally by their side in the face of racism and intolerance leveled in their direction.

I look forward to your questions. Thank you.

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Exhibit XX

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BLOG

Farrakhan Predicts Another Holocaust, Espouses Antisemitism and Bigotry in Saviours' Day Speech



Louis Farrakhan delivers his annual Saviours' Day speech at Wintrust Arena in Chicago on February 26, 2023.

Published: 02.27.2023

The Nation of Islam (NOI) held its annual Saviours' Day conference in Chicago the weekend of February 24–26, serving once again as a platform for vitriolic antisemitism and anti-LGBTQ+ bigotry.

Saviours' Day 2023 marked the annual event's return to a large-scale arena setting for the first time in three years; the NOI held smaller, [semi-virtual conferences](#) during the intervening pandemic-era years. NOI speakers injected familiar antisemitic and conspiratorial rhetoric into the weekend's activities, capped off by longtime NOI leader [Louis Farrakhan's](#) keynote address on Sunday afternoon.

The NOI has targeted Jews extensively during Farrakhan's 40-plus-year tenure as the group's leader and repeatedly dismissed accusations of antisemitism. The NOI made this focus particularly clear in recent months as the organization sought to insert itself into the national debate over antisemitism following the [Ye and Kyrie Irving](#) controversies, promoting content about Jews and antisemitism in their social media posts, weekly sermon broadcasts and newspaper articles.

Farrakhan directly addressed the NOI's long history of antisemitism in his speech on Sunday, demonstrating his obsession with Jews and affirming the NOI's position as a leading promoter of antisemitism in America today.

Farrakhan's keynote address

Farrakhan's wide-ranging, hours-long address, titled "The War of Armageddon Has Begun," featured a relentless stream of antisemitic commentary accusing Jews of controlling world governments, the media, and financial institutions. He promoted the false idea that Jews seek to manipulate and exploit Black people, deceive and destroy America, and engage in other nefarious or illicit activities.

Throughout his speech, Farrakhan spoke about the "[Synagogue of Satan](#)," a phrase from the Bible that the NOI and other antisemites often use to refer to Jews in a derogatory manner. Much of the speech read like a laundry list of age-old antisemitic tropes and conspiracies about [alleged Jewish power](#) as Farrakhan decried the nature and activities of this so-called Synagogue of Satan. "The Synagogue of Satan has destroyed the country," he said.

Farrakhan seemed to suggest that Jews, motivated by [greed](#), orchestrated the assassinations of former U.S. presidents Abraham Lincoln, James Garfield, William McKinley, and John F. Kennedy because each of them "threatened the international banking system" that had been set up to serve Jewish interests. He also appeared to

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rationalize Adolf Hitler's actions toward Jews in Nazi Germany by commenting that "Hitler went against usury and Hitler attacked pornography that the Jews had put on the Germans."

Farrakhan highlighted longstanding NOI claims about how Jews allegedly exert power over Black celebrities. He defended both Ye and Kyrie Irving, praising Ye as "a very great brother, a genius," and "a young god." He warned Black comedians to be wary of "who's writing your script," claiming that "behind the scenes, they give you a writer who's Jewish" and working toward "taking you down." Farrakhan commented that Jewish people "have control of so much that shapes thinking and the human mind" and added that "these demons, at every door that leads to power, they have a sentinel on watch."

The speech included multiple anti-LGBTQ+ statements, with Farrakhan commenting that LGBTQ+ people "have been deceived by Satan" and that they are "living a life that ultimately is destructive to [their] very being." He blamed Jews for promoting homosexuality in both the U.S. and abroad. Farrakhan described same-sex marriage as "the most horrible behavior" and commented that under the influence of the Synagogue of Satan, America has "become the dwelling place of devils...You can go in any city, you see them walk in the street – boys with boys, girls with girls, men with men, women with women – and they say they're happy. The country has become a cesspool."

Echoing remarks from previous speeches, Farrakhan claimed that "Africa had never been a homosexual continent" until the Jews who allegedly control international political and financial institutions exerted their influence. "They're not only breaking the divine law, they're selling the wickedness of their sinful life following after the teachings of the Talmud," Farrakhan said of these supposed Jewish powers and in reference to an ancient Jewish religious text that antisemites often vilify.

Farrakhan repeatedly portrayed himself as the "Messiah" anointed by God to expose and break the control of the supposed satanic Jews. "Somebody has to take on the

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Synagogue of Satan...They're gathering their forces," he said. "We cannot let them take the country...They got a stranglehold on America." As in previous speeches, Farrakhan likened himself to Jesus and claimed that Jews seek to kill him, recalling the centuries-old antisemitic [deicide myth](#).

Toward the end of the speech, Farrakhan addressed the "Synagogue of Satan" directly and explained that he was "going to close by telling you what your future is." Referring to the speech's titular War of Armageddon, he alluded to the Holocaust and insinuated that Jews would burn in ovens once again, as punishment for their "wickedness:"

- "A Jewish man said to me, 'You know, we say never again. Never again will we be in the oven. Never again.' I said, 'Hold it.' You can say that to men, but you can't say that to God. Because the Bible says, behold the day cometh that shall burn — as a what? —as an oven. And those who do wickedly, He will slay them and leave them neither root nor branch...The War of Armageddon is to decide who will live on this earth."
- "I'm saying to the Jews: if you want salvation, if you want to get back into the paradise of God, come with the Messiah, that's your ticket. Some of you have already recognized your brother as that. But that's an invitation to them to break them apart from those who are about to be destroyed. God is not unjust; when he kills you, you know you deserved it."

Beyond Farrakhan

Earlier in the weekend, prominent NOI figures — including Student National Assistant Minister [Ishmael Muhammad](#), Nation of Islam Research Group (NOIRG) member [Demetric Muhammad](#), and MGT and GCC (Muslim Girls Training and General Civilization Class) Vanguard member Tairah Muhammad — also shared antisemitic statements during their remarks.

While introducing Farrakhan prior to the keynote address, Ishmael Muhammad referenced Farrakhan's [deeply antisemitic 2013 lecture series](#), "The Time and What Must

Be Done,” to allege that Jewish people use the charge of antisemitism as a “trick” to manipulate and control others. Commenting on Jewish opposition to and labeling of Farrakhan as antisemitic, Ishmael Muhammad alleged that Jews’ “ultimate aim is to kill the Messiah” and detailed supposed Jewish plots to kill Farrakhan.

During an earlier plenary session, Demetric Muhammad promoted the claim that Jews exploit Black people for financial gain. Discussing the NOI’s early history under its former leader [Elijah Muhammad](#), he commented that “those old nefarious enemies of our beloved Minister today were present and on the scene in Detroit in the early 1930s... Life was difficult for most of our people at that time. And so instead of helping us, instead of uplifting us—things that you think you would do if you are the Chosen People of God—but they were busy helping us to have that miserable state of affairs.”

Impact and influence

While this year’s Saviours’ Day conference did not feature any high-profile guest speakers — past conferences have included prominent [anti-vaccine conspiracy theorists](#), [Holocaust deniers](#), and 9/11 “truthers” — multiple non-NOI figures were in attendance. Longtime Farrakhan allies and regular Saviours’ Day attendees including Father Michael Pflieger, Reverend Willie Wilson and Reverend Al Sampson were seated on stage during Farrakhan’s address.

The event also drew support from individuals and other accounts with significant social media followings. Grammy-nominated artists and NOI members Jay Electronica and Raheem DeVaughn both posted about Saviours’ Day. Singer Stacy Francis also shared a quotation and photograph from Farrakhan’s address with her 146K Twitter followers. NOI members and social media influencers [Rizza Islam](#) and Jibrial Muhammad (aka 19keys) were in attendance and both shared clips from inside Wintrust Arena with their hundreds of thousands of Instagram followers.

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Multiple Saviours' Day-related hashtags, including #SD2023 and #Farrakhan, entered Twitter's trending topics on Sunday afternoon. Both Louis Farrakhan's Twitter account and the NOI's official account, which was [recently reinstated](#) following Elon Musk's takeover of the platform in late 2022, shared clips from the speech. [As in years past](#), content from Saviours' Day 2023 is likely to continue to spread online in the coming days and weeks, demonstrating the reach of Farrakhan's pervasive antisemitic and bigoted beliefs.

Farrakhan's virulently antisemitic and anti-LGBTQ+ address was enabled in part by various mainstream entities which, despite the established history of hate and bigotry espoused at past Saviours' Day events and by the NOI more broadly, failed to take steps to limit the reach of Farrakhan's words before, during, or after the event.

A coalition of local Jewish and LGBTQ+ organizations, including the ADL Midwest, Equality Illinois and the Jewish United Fund/Jewish Federation of Chicago, [wrote](#) to the leadership of the Metropolitan Pier and Exposition Authority (MPEA), the owner of Wintrust Arena, ahead of Saviours' Day to share information about Farrakhan's history of hate and bigotry and [called on](#) the MPEA to speak out against the harmful views expressed at the event. To date, MPEA has not made any public comments.

[Ticketmaster](#), which hosted online ticket sales for the event, also did not take any action ahead of Saviours' Day.

When Farrakhan delivered his keynote speech to the packed crowd of cheering supporters at Chicago's Wintrust Arena, NOI leaders claimed that the venue, which seats approximately 10,000 people, was sold out. Online, tens of thousands of viewers tuned in across various streaming platforms. Mainstream sites like YouTube and Facebook both failed to take action against these livestreams, despite the violative content promoted in Farrakhan's speech.

RELATED ITEMS

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2/28/23, 8:45 AM

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Nation of Islam

Saviours' Day

Farrakhan: In His Own Words

Farrakhan Promotes Antisemitism, Anti-vaccine Conspiracies in "Swan Song" Saviours' Day Address

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Exhibit YY



Letitia James

New York State Attorney General

Attorney General James Warns Against Antisemitism, Islamophobia, and Hate in New York

AG James Condemns Hateful Acts Against Israelis, Palestinians, Jews, and Muslims

October 12, 2023

NEW YORK – New York Attorney General Letitia James today issued a statement strongly condemning and warning against antisemitism and Islamophobia in New York in the wake of the terror attack in Israel and the war in Gaza. There have been recent reports of increased acts of hate and discrimination in New York.

“Let me be clear: New York has zero tolerance for hate of any kind, not now and not ever. As we mourn the loss of innocent Israeli and Palestinian lives, there is no excuse or tolerance for antisemitism, Islamophobia, or bigotry and discrimination of any kind. No New Yorker should fear walking in our streets because of what they wear, what they believe, or where and how they practice their faith. I encourage anyone who experiences a hate crime or bias incident to report it to my office.”

New York’s human rights and civil rights laws prohibit violence, intimidation, harassment, and discrimination against any person based on their race, national origin, religion, religious practice, ancestry, race, gender, age, disability, or sexual orientation. Attorney General James urges anyone who witnesses a hate crime or is a victim of a hate crime or bias incident to call 911 and [report it online](#) to the Office of the Attorney General (OAG) or by calling OAG at 1-800-771-7755.

For more information on how to report a hate crime, visit [OAG’s Hate Crimes website](#).

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Exhibit ZZ



Leticia James

New York State Attorney General

About the Office



As head of the Department of Law, the Attorney General is both the People's Lawyer and the state's chief legal officer. The Attorney General serves as the guardian of the legal rights of the people of New York, its organizations, and its natural resources. As the state's chief legal counsel, the Attorney General advises

the executive branch of state government, and defends actions and proceedings on behalf of the state.

Meet Letitia James

The Attorney General serves the public interest of all New Yorkers in matters affecting their daily lives, enforcing laws to protect consumers, tenants, patients, workers, investors, and charitable donors. The office coordinates statewide civil and criminal investigations, promoting economic and social justice, encouraging harm-reducing public health strategies, and preserving the state's environment.

While the Attorney General acts independently of the Governor, the Governor or a state agency may request the Attorney General to undertake specific criminal investigations and prosecutions. The Attorney General's authority also includes the activities and investigations of the Organized Crime Task Force and Medicaid Fraud Control Unit.

The office employs over 1,700 staff, including investigators, analysts, scientists, forensic accountants, legal assistants and support staff, and over 700 assistant attorneys general, serving in over two dozen locations across New York state.

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Administration Division

The Administration Division consists of:

- Administrative Services Bureau
- Budget and Fiscal Management Bureau
- Human Resources Management Bureau
- Information Technology Bureau

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Exhibit AAA

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Transcript: Mayor Eric Adams Discusses Coordinated Efforts That Stopped Potential Attack on Jewish Community

November 21, 2022

Video available at: https://youtu.be/ng6IRS_Fnr8



Deputy Mayor Philip Banks III, Public Safety: Thank you. Good morning. Thank you for joining us today. My name is Philip Banks III. I'm the deputy mayor for public safety. Thank you for joining us today to hear about the coordinated efforts by law enforcement at the city, state, and federal levels, to prevent attacks on the Jewish community this past weekend.

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4/15/23, 4:11 PM Case 1:23-cv-00110-DLC Document 72-60 Filed 01/06/24 Page 3 of 11
Transcript of Mayor Eric Adams' Disembodied Remarks to the Jewish Community | City of New York

Teamwork. Something that the mayor has been stressing since day one of this administration. Can you imagine what we can accomplish if we work together as a team? Today, you are seeing an example of that teamwork. Multiple entities coming together in a short period of time to coordinate, communicate, develop, and implement their plan, a plan that saved lives. Teamwork.

I'd like to start by thinking all of those standing behind us today, including representatives from the NYPD, state police, the FBI, the Joint Terrorism Task Force, the MTA, the MTA Police Department, the Manhattan District Attorney's Office, the Office of the Prevention of Hate Crimes, and the Community Security Initiative, as well as numerous Jewish organizations, including the United Jewish Association, Federation of New York, Central Hatzalah, and the Flatbush Shomrim Safety Patrol.

We also have numerous, several religious leaders from the Jewish community here, including New York City Council Member Eric Dinowitz, who is the head of the New York City Council Jewish Caucus. We have Rabbi Liebowitz, Rabbi Steinmetz, Rabbi Miroznick, Rabbi Rothman, Rabbi Fink, Rabbi Tesser, Rabbi Heinz, and Rabbi Berish Freilech. Without further delay, I'd like to introduce the mayor of the City of New York, Mayor Eric Adams.

Mayor Eric Adams: Thank you, deputy mayor, and I too join ... I'm not as tall as you, so I'm going to move the stand over. I too join the deputy mayor in acknowledging the work of our partners. This past weekend, both the police commissioner and I were notified of a credible threat on Jewish New Yorkers and immediately communicated with our teams to take appropriate action.

The potential attack on Jewish New Yorkers, because of that coordination, was averted. It was due to heroic actions of the MTA Police Department Officer Ryan Fackner and Officer Conor Colasurdo. Both responded appropriately based on the information that was disseminated, and the dedicated efforts of the men and women who we are here today. The leadership is represented throughout those who are standing by. Both officers arrested two suspects at Penn Station on Saturday morning after one of the suspects was flagged by making antisemitic and threatening posts online, including references to perpetrate an armed attack on a synagogue.

Thanks to the exceptional investigative work of the FBI and NYPD Joint Terrorist Task Force, the NYPD Intelligence Bureau, and the MTA Police Department, the suspects were apprehended before they could act on the alleged plan to murder members of the Jewish community in our city.

This was not an idle threat. This was a real threat. After arresting the suspects, law enforcement officers recovered a Glock semi-automatic firearm, a ghost gun with an extended 30-round magazine and laser sight, a large hunting knife, a black ski mask, and a Nazi arm band. A Nazi arm band, in New York City, in 2022. Think about that for a moment.

Over 77 years ago, after allied soldiers liberated Auschwitz and exposed the full extent of the horrors of the Holocaust. Hate is on the rise in America, a dark cloud over our nation. It has become normalized by politicians and celebrities, amplified by social media and cable news, and weaponized by the easy availability of guns in this country. This was a ghost gun. That adds to the already over-saturation of guns in our city and cities across America. This is a toxic mix with frightening implications for our society.

From the massacre of Black shoppers in Buffalo to the killings at an LGBTQ+ nightclub in Colorado Springs over the weekend, we see communications and communities across the nation being targeted for their race, their beliefs, and their way of life. This hate cannot be allowed to take hold and build and gain further ground. America must defeat the rising threat of domestic terrorism. It is real. It is here. And we must have a formidable approach to it, and we must reject the hate and division that drives it.

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4/15/23, 4:11 PM Case 1:23-cv-00110-DLC Document 72-60 Filed 01/06/24 Page 4 of 11
Transcript of Mayor Eric Adams' Disembodied Remarks to the Jewish Community | City of New York

This time, thanks to thorough coordination between multiple agencies at numerous levels of government, we were able to avert this threat. Law enforcement was able to prevent an attack like the shocking stabbings that took place at the rabbi's home in Monsey, New York during Hanukkah in 2019. But it's clear, there's others who share antisemitic beliefs and hateful ideas. We must and will be vigilant in the weeks leading up to Hanukkah and this holiday season. And the NYPD will do its part. I want to say thank you to everyone that's here that participated in the coordination over the weekend and the coordination during this holiday season.

Now I'm going to salute the leadership of Commissioner Keechant Sewell for a quick action and coordination without the men and women of our Police Department to avert this threat. There are a lot of critics out there, but I hope today they can and understand what the NYPD does every day for the city of New York. Protecting communities, families and New Yorkers of every faith from the violence as some want to inflict, keeping our Jewish communities and other communities safe in the face rising threats and antisemitism, getting dangerous weapons off our streets, and fighting the rise of violent domestic extremism in this country.

As the mayor of the largest Jewish community in the United States, it is my sacred duty to protect Jewish New Yorkers and this entire community from antisemitism and bigotry. And in my administration, we know this is one of our highest priorities is to protect all New Yorkers from violence and crime. We will continue to be vigilant and protect the communities involved in general, but specifically the Jewish community, with every resource that's necessary, because hatred and antisemitism would not take foothold in our city.

No one should feel threatened walking down the street or traveling on the subway. No one should ever feel threatened walking into their synagogue or place of worship. We're going to fight the rise in antisemitism and extremism and continue to support our law enforcement communities. Again, we want to thank all who were involved. Thank you very much.

Deputy Mayor Banks: Next, we'll hear from the commissioner of the City of New York, Commissioner Keechant Sewell.

Police Commissioner Keechant Sewell: Thank you, Mr. Mayor. Good morning. Thank you all for being here. In addition to our partners, I am pleased to be joined by Deputy Chief John Hart of our Intelligence Bureau, who was a big part of this investigation from the very beginning. The focused collective efforts of the NYPD and our partners were able to uncover, investigate, and most importantly, stop a threat to our Jewish community. This was an urgent multi-agency operation to address danger that was developing in real time.

This is a clear example of public safety being a shared responsibility. It takes all of us working together to effectively safeguard the people we serve. And these partnerships that we are highlighting today are at the heart of that effort. We have to remain vigilant and monitor threats of any kind, symbols of hate written online or posted on social media every day. The job of the NYPD and our colleagues here is to put public safety first and protect the people of this city. We coordinated with our partners, we communicated, organized and established a plan, and the result was a high level of committed collaboration that averted a threat of targeted violence. It is important that our communities know and we will never tolerate hate or violence in New York City. We will use our resources and partnerships to stop, investigate, arrest, and hold accountable anyone who threatens the safety of the people of this city.
Deputy Mayor Banks.

A-368

4/15/23, 4:11 PM Case 1:23-cv-00110-DLC Document 72-60 Filed 01/06/24 Page 5 of 14
Transcript of Mayor Eric Adams' Discussed in the News - City of New York

Deputy Mayor Banks: Thank you, commissioner. Now, we're going to hear from Mike Driscoll, the assistant director of the FBI's New York field office.

Michael Driscoll, Assistant Director, FBI New York Field Office: Good morning. Thank you all for coming. I appreciate the invitation from the mayor's office and the police commissioner to speak to all of you today. On Friday evening, the FBI and the Joint Terrorism Task Force received information regarding an individual believed to pose a physical threat to an unidentified synagogue. With a significant sense of urgency, members of the JTTF set about identifying the individual or individuals involved. As you have heard, we, along with our law enforcement partners, began an investigation of one possible subject, Christopher Brown of Aquebogue, New York. And then during that investigation, a second individual, Matthew Mahrer of Manhattan was also identified as an associate.

Through close coordination with law enforcement across the region, both Mahrer and Brown were located Friday night and taken into custody. At the current time, we have no information to indicate there is any continued threat to the Jewish community or to any community here in New York associated with this case. Both subjects are both facing state charges. No decision has been made yet regarding possible federal charges. That investigation continues.

I want to thank the many law enforcement partners for their assistance in this matter and for helping to quickly ensure that the safety of our city was preserved. The JTTF and NYPD Intelligence Bureau were in close coordination throughout the investigation, and I'm grateful for NYPD's partnership and collaboration. I also want to highlight the outstanding work by the MTA Police in support of this case. Port Authority Police, likewise, were extremely helpful in the safe resolution of this matter. And most importantly, I want to thank the members of the public for the information already shared in this case. If anyone else has information regarding these individuals or any threat to the Jewish community, I would ask that you reach out to the FBI or NYPD as soon as possible. This is still very much an active investigation. The FBI can be reached at 1-800-CALL-FBI. The support of our community partners and private citizens is crucial to preventing violence in instances like this. The old adage of see something, say something remains very, very true and extremely important. So, again, thank you all for being here today.

Deputy Mayor Banks: Thank you, Assistant Director Driscoll. Next, we're going to hear from the Manhattan District Attorney Al Bragg.

Manhattan District Attorney Alvin Bragg: Thank you, deputy mayor. Thank you, mayor, commissioner, director, and to all of our law enforcement partners. Local, state, and federal agencies working collaboratively, swiftly stopped a horrible threat. The NYPD, the FBI, the Task Force, the MTA, and members of my office, the Manhattan District Attorney's office, worked together to intervene, execute search warrants, and ultimately have two people arraigned in Manhattan Criminal Court. While we can't get into the specifics of the matter, as it is an ongoing investigation and I can't go beyond the court filings, the allegations in the court filings are stark. Possession of a firearm, a high capacity magazine, an eight inch long military style knife, a swastika arm patch, and a Twitter posting about shooting a synagogue. The Manhattan District Attorney's Office will be using the full resources of our counter-terrorism program and our expanded hate crimes unit for accountability and justice in this matter. We do not tolerate illegal guns in this city, we do not tolerate hate and antisemitism in this city, and we do not tolerate violence in this city.

Deputy Mayor Banks: Thank you, district attorney. Next, we're going to hear from the CEO of the MTA, Janno Lieber.

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Transcript of Mayor Eric Adams' Disembodied Remarks to the Stop Hate Crime Act Hearing | City of New York

Janno Lieber, Chair and CEO, Metropolitan Transit Authority: Okay. Thank you, Mayor Adams, thank you, Police Commissioner Sewell for all you do every day, every day to keep New Yorkers safe. And to our MTA men of the hour, MTAPD officers Ryan Fackner and Conor Colasurdo, two dangerous, hateful individuals are now in custody because of you and your quick action on the intel developed by the JTTF and the NYPD. The story could have ended in tragedy, but thankfully did not. Attacks like the one that were planned by these individuals are especially repugnant to New Yorkers who treasure diversity and tolerance as central to our city's history and to our identity right up to today.

And this is a little personal for me. My father came to this country in 1941 as a refugee from Nazis and lost his mother, my grandmother, and other relatives in the Holocaust, so you can imagine my reaction when I heard from City Hall late Friday night that there were people with Nazi swastika arm bands using our MTA transit system — which I'm privileged to oversee — using our transit system en route to planned attacks on synagogues. Imagine.

Thank goodness the law enforcement agencies represented here today are among the very best at intelligence gathering, and thank goodness they've already developed incredibly effective procedures for coordinating action on intelligence. This is how it should be, agencies working together smoothly to keep New Yorkers safe. I speak for Governor Hochul as well when I extend thanks to everybody in the law enforcement community who was involved with this, especially, as I said, the MTAPD officers, Fackner and Colasurdo. The governor would've been here today herself except, as everybody knows, she's grounded in Buffalo due to the epic snowfall. I know that there's nothing more important to Governor Hochul and to all of us here than safety.

In light of this incident and the attack in Colorado Springs on the LGBTQ nightclub, the governor has directed our state police who are represented here today to increase surveillance and protection for communities, like the Jewish community, that are at risk of hate crimes. That's an action that was already be taken. We will continue to work closely with our partners at the NYPD, the state police, and all local and federal law enforcement to keep our people safe. The MTA has never had a better relationship with City Hall and Albany, and that's because of the leadership at the top, Mayor Adams. Thank you for and your Police Department for everything you are doing to keep New Yorkers safe.

Deputy Mayor Banks: Thank you, CEO Lieber. Our final two speakers represent our Jewish community who are very vital in stopping this potential attack. First, we'll hear from Eric Goldstein, the CEO of the United Jewish Association Federation of New York.

Eric Goldstein, CEO, UJA-Federation of New York: Thank you very much, deputy mayor. And let me begin by thanking Mayor Adams. The Jewish community could not have a better friend. I want to also acknowledge the incredible work of NYPD, the FBI, MTA, and our own community security initiative. Thanks to their collective expertise, commitment, and cooperation, what might have been the next Pittsburgh or Poway synagogue massacre was averted. Specifically this past Friday, our community initiative professionals shared a lead with NYPD and FBI New York, and they immediately sprung into action. Within hours, their efforts led to the apprehension of two dangerous, fully armed men preparing for an attack on our Jewish community. New York City is home to 1.6 million Jews, the largest Jewish population of any city in the world.

In 2018, in the aftermath of the heinous 2018 attack on the Tree of Life synagogue in Pittsburgh, we at UJA-Federation understood the need to invest in increasing security for the more than 2,000 vibrant Jewish communal institutions in New York. We launched the Community Security Initiative with JCRC New York, headed by Mitch Silber, the former head of NYPD Intelligence. Mitch and his now 12 person

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Transcript of Mayor Eric Adams' Disembodied Remarks to Members of the Jewish Community | City of New York

team spend every waking moment working across the community to ensure our safety and they work hand-in-hand with the volunteers at CSS and our friends at ADL in this critical work.

Just this past Saturday, the director of the FBI said that the Jewish community is under threat, "From all sides," and that they quote, "Desperately need further support from law enforcement." Declaring that addressing growing antisemitism, is a national priority. Here in New York, we need to ensure that everything possible is being done to address the rising threat. That means every element of city and state government working in coordination, from intelligence and prevention to arrest and prosecution.

But let me be clear, the Jewish community of New York will continue to live proudly Jewish lives. We're immensely proud to live in this great City of New York and will remain vigilant and undaunted as we work together in the weeks and months ahead, to do all we can to ensure that antisemitism and hate have no home in New York and again, thank you Mayor Adams for your incredible work.

Deputy Mayor Banks: Finally, we will hear from Steve Weill from the Flatbush Shomrim Safety Patrol, which was vital in getting the word out during Shabbat about these two suspects.

Steve Weill, Flatbush Shomrim Safety Patrol: Good morning, thank you all for coming. Just two quick points I want to make. The first is that when we talk about teamwork with the community, the teamwork did not start this Saturday night. This teamwork did not start a week ago or two weeks ago. Probably a week after the mayor took office, he came to Brooklyn, he sat down with us, he sat down with Hatzalah, he sat down with Shomrim. And he has a deep understanding of what we do and he definitely reached his hand out and said any help that we will need at all, at any time, he will make every resource available and we've had many, many antisemitic attacks that have happened.

Not everything hits the news, but in each case, somebody from the mayor's office was involved, gave us guidance. The Police Department got involved and this is an unprecedented relationship that we have right now with the mayor's office, the Jewish community and the Police Department. And the information that flows, it's incredible that we can get such sensitive information and that they can have the trust in us, to relay that to the community in a calm manner and a professional manner.

My second point, which is just to talk about the actual incident. On Friday night, I got a call from the Inspector Richie Taylor and he advised me that there was a credible threat to the community. Within minutes, we came up with a plan that we were going to implement at 6 a.m., just in case. We didn't want to alarm the community, but we put a plan in place where hundreds of trained volunteers would reach all the synagogues and all the houses of worship in the areas and warn them. But we waited because we figured the agencies that are standing right here know who these suspects are and hopefully they will apprehend them by then and we would avoid alarming the community. And that's exactly what happened. I just want to say thank you again to the mayor and to the Police Department for all their support and we consider ourselves eyes and ears of the Police Department. We get a lot of sensitive information, which we pass on, and this teamwork is really what makes New York a special place. Thank you.

Deputy Mayor Banks: Thank you Steve. Now we're kicking to Fabien for on-topic Q&A.

Mayor Adams: And we just want to just keep in mind, this is an active investigation and we're not going to go into the details of any investigation. And my staff just updated me, the gun that we had was a serial hidden — serial number, but it wasn't a ghost gun. Let's open for any on-topic. Take a few on-topic.

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Transcript of Mayor Eric Adams' Discussed Efforts to Stop Potential Attack on Jewish City of New York

Question: Governor Kathy Hochul says that she's providing resources to communities to help combat any potential threats, like state police. Are you guys working with her and what does that look like here in New York City?

Mayor Adams: Complete coordination with the governor's office. As we stated throughout the year, she has been an amazing partner, identifying the resources we need to combat all forms of violence. Thus far this year, we've removed over 6,500 guns off the street. This is one of them. This was a fully loaded gun and it's imperative that whatever resources we need, we communicate with the state police and she has been forthright, forthcoming in making sure we receive those resources.

Question: Do you have a specific number though? A specific number of state police who are here in the city to help with that?

Mayor Adams: Any given day, you see them taking the pressure off our New York City police personnel at the highways, dealing with other forms of law enforcement. And so the numbers could vary on who's exactly assigned in the New York City area.

Question: Could you walk us through the timing of when you received the tip, when you were contacted and, when the two men were apprehended and arrested?

Mayor Adams: I was notified immediately by the chief of the department. The FBI immediately when they determined that the threat was credible, it was sensitive information, they immediately notified our agencies and both the police commissioner and I were notified immediately. And the police commissioner directed the deployment of police personnel. Our number one priority was to apprehend the suspects as quick as possible.

Question: What time was that around?

Mayor Adams: It was probably some time... I didn't see my exact watch. It could have been probably 15, 20 minutes after the NYPD was notified. It was immediately after. It was during the evening hours. I know we were out at different events.

Question: Mr. Mayor, can you tell us anything about the location (inaudible)?

Mayor Adams: No, not at this time.

Question: Good morning. I wanted to ask, the two suspects, were they known previously to the FBI and NYPD and the second part is that they said that they were using Twitter to spread these messages (inaudible) white supremacist network on Twitter. Can someone speak about the role of Twitter and other social media sites spreading... This has gotten worse over the years or months, in terms of spreading this information, recruiting people, it seems and that sort of stuff.

Mayor Adams: Well, we're not going to go into if the individuals were known or not known. As the FBI and the DA office stated, it's still an active investigation and we don't do anything that's going to jeopardize that. But we will respond to the role of social media. We've talked about this often. The social media must become more responsible in the spreading of hate and organizing and allowing their platforms to be used as an organizing tool. We saw what happened in Buffalo. The individual involved was radicalized not by his parents, not by his family. They were radicalized by this new community that is really given life through social media. And it is time for social media to come to the table and reckon with the role that social media unintentionally is playing in the spreading of hate and people are using their platform to organize these hate campaigns.

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Transcript of Mayor Eric Adams' Discussed Embarked Efforts to Stop Potential Attack on Jewish City of New York

Question: Mr. Mayor, over the last couple of years, New York has consistently led the nation in antisemitic attacks. What exactly is the NYPD and City Hall doing to either update the NYPD safety plan or (inaudible) task force? What are you guys doing to update the (inaudible)?

Mayor Adams: Well one, what we're doing is what we did today and that's why we're here, is coordination. And dealing with specifically antisemitism is not just a law enforcement issue. We need to stop the feeders of antisemitism. That is why we've partnered with the ADL and other organizations, the Anti-Defamation League and other organizations to say, "How do we create environments where hate cannot grow in our cities?" We're doing it in the Department of Education, we're doing it in collaborations with some of the organizations that are mentioned here with partnership — Rabbi, the Board of Rabbis, Rabbis Potasnik and others. We know we have to stop the feeder of hate in our cities, in all the different groups in this city. And then we must have a real law enforcement response. The commissioner immediately put new leadership over at the Hate Crime Unit because we wanted to be clear that if there are those who are using hate to target people in the city, we want those cases investigated, we want the people apprehended, and we want to make sure that they're prosecuted to the full extent of the law.

Question: It would appear, mayor, that this was a very close call, the Jewish community here in New York. Can you characterize that for us?

Mayor Adams: We cannot take these cases lightly. Who would've thought what happened in Buffalo, an individual will take a weapon and walk into a supermarket. These are real threats, and we did not... I want to really take my hat off to the FBI, they did not take any chances here. They immediately notified the agencies in the city and allowed us to kick in gear the communication network that we've already had in place. That included some of the local security patrol, because we know during of Jewish religious observance, it is difficult to get communications out, and so to have the local security patrols able to put a plan in place to immediately notify before synagogues opened, that was a huge undertaking and something we can't miss. But to have a person armed, with have the means, the hate, and the desire to carry out a crime of this magnitude is serious. We averted that step.

Question: And if I could follow up also (inaudible) here, can you just give us a little more detail about the arrest and Penn Station, how that went down?

Lieber: The bottom line is that we were notified by the Police Department and by City Hall that this was underway, that this intelligence had been identified. And we put out through what they call a BOLO, Be On The Lookout, with a specific description of the suspects, notified based on the intel from the JTTF and the NYPD, notified our staff in Penn Station that they might be using the MTA transit system, especially the Long Island Railroad. And officers were deployed and ultimately acted on the description that had been provided through that BOLO, the Be On The Lookout information that came from NYPD and the JTTF.

Question: They had photos of the suspect?

Lieber: Yeah, they had full descriptions, and they were able to identify them from what they'd received from the other law enforcement.

Question: Mr. Mayor, you mentioned negative rhetoric by celebrities. In the past two days we've seen...

Mayor Adams: Hold on, hold on, hold on. Did you call in? Okay.

Question: You mentioned negative rhetoric by celebrities. In the past few days we've seen Kyrie return to the Nets, we've heard about Kanye being allowed to return to Twitter. Do you think either of these

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Transcript of Mayor Eric Adams' Press Conference on the Coordinated Efforts to Stop a Potential Attack on Jewish City of New York
celebrities should have been allowed to return to the respective platforms?

Mayor Adams: I don't own these platforms, and I don't want to specify particular cases because it's broader than the specific case. Social media, intentionally or unintentionally, social media has become a platform that is assisted with the organizing and the growth of hate in our country and on the globe, and they need to become more responsible.

Question: Do you think it's dangerous for either of them to have returned to Twitter?

Mayor Adams: No, I didn't say that either, I said I was not going to do a specific case. I'm talking about social media. Because social media is being used as a tool to spread hate. The young man in Buffalo, he was not an athlete, he was not an entertainer. He had access to a gun, and he took the lives of innocent people in the supermarket. And so I think we need to focus on the larger issue, and that's social media.

Question: On social media, given what you just said, do you think it was a good decision that Twitter made to reinstate Trump?

Mayor Adams: I don't know. Mike, are you at the same press conference? That was the question he asked. I think I don't control neither of those platforms. They must reckon with the fact that their platforms are being used to spread hate and violence. It has left a point of just spreading hate, it is now being used as a tool to spread violence, and they need to reckon with that.

Question: You mentioned that leading up to Hanukkah, more will be done to secure Jewish places of religion and worship. What specifically will we see, increased presence, or what else is going to happen to protect these institutions?

Mayor Adams: Well, there's a combination of things we do around the Hanukkah season normally and around the holiday season. From securing safety of our parades, to securing our houses of worship. But when you have an increase in attacks, what we saw in Colorado with the LGBTQ community and what you're seeing with threats like this, we're always concerned about copycats. And so there will be an increased presence. And the police commissioner would put out some clear directives through the chief of department on how we're going to secure our synagogues and other houses of worship.

Question: Hi Mr. Mayor. I'm wondering if you may confirm a report that Matthew Mahrer is Jewish and the grandson of a Holocaust survivor?

Mayor Adams: No. That's part of the investigation and I'm sure the DA's office and others will determine how that plays into this whole encounter. Okay?

Question: Can we hear from the officers who were there, who made the arrest?

Mayor Adams: Come on, where's the officers? Come on down. Thank you officers. I hear you, I got you.
(Applause.)

Question: Can you tell us what happened?

Ryan Fackner, Officer, MTAPD: We were just on patrol at Penn Station, like everybody was just repeating up here. It was a Joint Task Force. They put out the BOLO for the individual, Chris Brown, and they said he might have been traveling to the subway to Penn Station to take the Long Island Railroad.

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We were up at 34th and Seventh, 34th Street and Seventh Avenue when we saw him actually walk in with his friend. They both walked in through the entrance, we followed him down the escalator, stopped him and made the arrest.

Question: Did they fight back at all?

Fackner: No, they were completely compliant... (Inaudible.) Mine? Ryan Fackner. Ryan Fackner.

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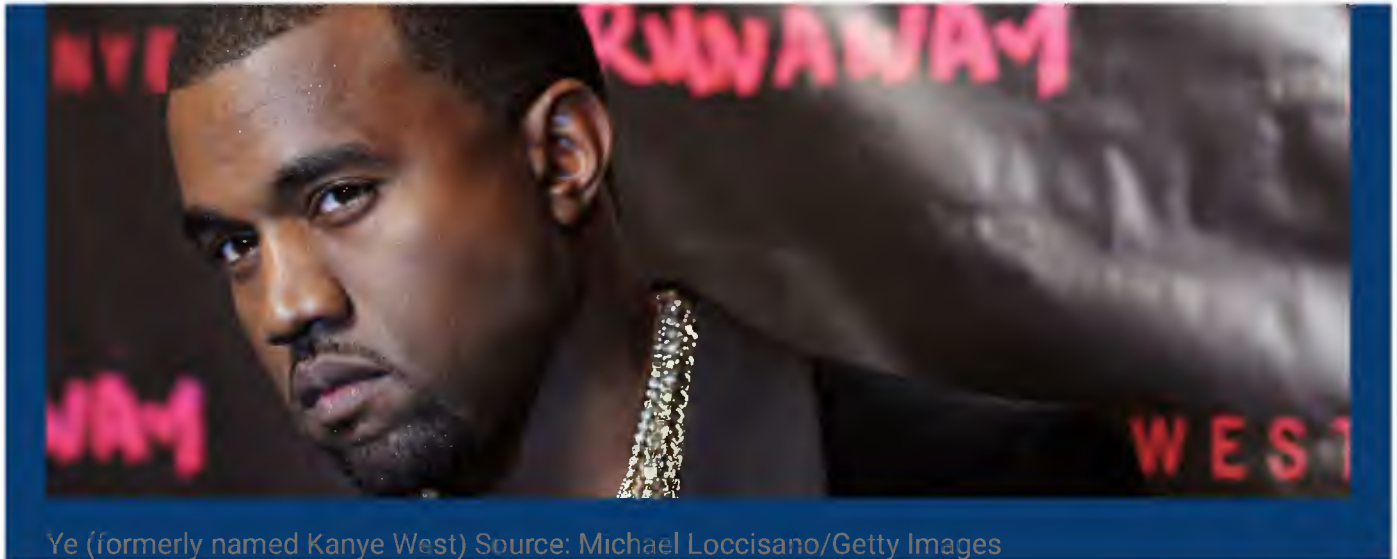
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Exhibit BBB

Ye (Kanye West): What You Need to Know



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Since early October 2022, Ye – the highly influential artist, record producer, and fashion designer formerly known as Kanye West – has drawn media attention for inflammatory antisemitic and conspiratorial remarks. Ye made offensive claims about Jewish people and Jewish identity during an October 6 [interview](#) with Fox News’ Tucker Carlson. Over the next two days, Ye [shared](#) social media posts which insinuated that Jews are using their purported control to intimidate him and threatened to go “death con [sic] 3 On JEWISH PEOPLE.” Ye repeatedly doubled down on his antisemitic beliefs during subsequent interviews, including on Revolt TV’s “Drink Champs” on October 16, NewsNation’s “Cuomo” on October 17, TalkTV’s “Piers Morgan Uncensored” on October 19, and the “Lex Fridman Podcast” on October 24.

Ye has continued to express extensive antisemitism – including praising Adolf Hitler and promoting Holocaust denial. He has also engaged directly with prominent extremists, antisemites and conspiracy theorists. In November, Ye tapped white supremacist [Nick Fuentes](#) and bigoted right-wing provocateur [Milo Yiannopoulos](#) to work on his 2024 presidential campaign. Ye, Fuentes, and Yiannopoulos then drew widespread attention when they [dined with former President Trump](#) at his Mar-a-Lago residence. In December, Ye appeared on conspiracy theorist [Alex Jones'](#) InfoWars show, praising and citing extremists and bigots including anti-Muslim activist [Laura Loomer](#), antisemitic conspiracy theorist [Owen Benjamin](#) and Nation of Islam leader [Louis Farrakhan](#). Later that month, Ye spoke with a prominent member of the [Israelite School of Universal Practical Knowledge \(ISUPK\)](#), an extremist sect of the [Black Hebrew Israelite movement](#), on Clubhouse.

Here's what you need to know about Ye's statements, his history of espousing controversial views and why they are concerning:

- **Ye's recent statements draw on longstanding antisemitic tropes and conspiracy theories about Jewish people.** For example, he promoted tropes about Jewish [power and control](#) – including in the entertainment industry, media, politics and business – as well as tropes about Jewish [greed](#) and the notion that Jewish people exploit and intimidate others for financial gain. Ye's generalizations about Jews is deeply offensive and perpetuates these harmful stereotypes.
- **Ye's comments also reflect beliefs espoused by fringe antisemitic religious groups, including extremist sects of the [Black Hebrew Israelite movement](#) and the [Nation of Islam](#).** Ye has claimed that Black people are "Jews" and "Semites" and therefore cannot be antisemitic. This is not a reference to the religion of Judaism or traditional understandings of Jewish ethnicity, but rather a belief found in [Black Hebrew Israelite ideology](#) which asserts that certain people of color are the true descendants of the biblical Israelites. Extremists use this

concept to promote antisemitism, claiming that Jewish people today are imposters who stole the religious heritage of Black people and are engaged in a global conspiracy to oppress non-Jewish people.

- **While there is no evidence that Ye views himself as a member of any organized extremist group, he has a longstanding and ongoing relationship with the Nation of Islam and its leader, Louis Farrakhan.** Ye visited the group's headquarters in Chicago to publicly express his support for their Millions More Movement in 2005 and attended an event that Farrakhan held in Los Angeles in 2015. Ye's 2015 song "All Day" includes a lyric which describes Farrakhan as "sensei." Ye has turned to Farrakhan when embroiled in antisemitism controversies on multiple occasions, including taking Farrakhan's advice not to apologize in 2013 when Ye was criticized for alleging that Jewish people are more well-connected than Black people. Ye cited Farrakhan on "Drink Champs" in 2022 and played a voicemail that Farrakhan reportedly recently sent him.
- **Beyond antisemitism, Ye is no stranger to controversy and has a history of making anti-Black, false, conspiratorial statements.** Ye's interview with Tucker Carlson on October 6 was itself a response to widespread criticism that Ye received following his decision to wear a shirt with the white supremacist slogan "White Lives Matter" at Paris Fashion Week. During his recent "Drink Champs" appearance, Ye repeated the debunked claim that George Floyd, who was murdered by police officer Derek Chauvin in 2020, died of fentanyl. In recent and past interviews, Ye frequently cited the misleading claim that abortion is the leading cause of death for Black Americans. In 2018, Ye stated that 400 years of slavery "sounds like a choice." He drew criticism again in 2018 when he called for the 13th Amendment to be abolished.
- **Known extremists and antisemites have embraced Ye's recent statements, leveraging his comments to further their own agendas.** For example, the Nation of Islam and extremist Black Hebrew Israelite sects have defended Ye's

statements about Black people and Jewish identity and used the opportunity to promote antisemitic claims and conspiracy theories. White supremacists have celebrated Ye for using his influential platform to “expose” Jews. Members of the extremist [Goyim Defense League](#) held a demonstration in Los Angeles on October 22, displaying a banner over Interstate 405 that read “KANYE IS RIGHT ABOUT THE JEWS” while giving Nazi salutes. [Proud Boys](#) members, [QAnon](#) adherents and other conspiracy theorists have also seized on reports that Ye may purchase the right-wing social media platform [Parler](#).

- **As an internationally recognizable celebrity whose work spans multiple industries, Ye’s comments are concerning not just because of their antisemitic content, but because of his immense influence.** Ye has nearly 50 million combined followers on Twitter and Instagram (for comparison, the global Jewish population is approximately 15 million). Ye is one of the [top-selling musical artists](#) of all time and, prior to Adidas [ending their partnership](#) with Ye on October 25, Ye’s [Yeezy line](#) accounted for between one and two billion dollars in annual sales for the company. In addition to being embraced by extremists, Ye’s comments advance the spread of antisemitic ideas in the mainstream.

Below are some of Ye’s recent statements about Jewish people and Jewish identity which play into antisemitic tropes or echo claims made by known antisemites and extremists:

Claims about Jewish Control of Media and Government

In many of his recent interviews, Ye repeatedly referenced purported Jewish control over various industries – he used the phrase “Jewish media” over twenty times on “Drink Champs” alone. Ye, seemingly using “Jews” and “Zionists” interchangeably in many instances, has also spoken about “Jewish Zionists,” “Zionist media handlers” and “Zionist control.” He made multiple references to prominent Jewish individuals,

including George Soros — the Hungarian Jewish billionaire philanthropist and Holocaust survivor who is a frequent bogeyman for both avowed antisemites and the political right — and Jared Kushner, as supposed examples of Jewish power.

Ye's insinuations about Jewish control perpetuate the longstanding antisemitic trope that Jews wield an inordinate amount of power and exert control over global systems as part of a quest for world domination. These views are regularly promoted by extremists and antisemites of a wide variety of ideologies, from white supremacists and extremist Black nationalist groups to conspiracy theorists and Holocaust deniers.

- “Jared Kushner is an example of how the Jewish people have their hand on every single business that controls the world.” (Ye on “Drink Champs,” 10/16/22)
- “We’re not going to be owned by the Jewish media anymore...Every celebrity has Jewish people in their contract...And these people, if you say anything out of the line with the agenda, then your career can be over.” (Ye on “Cuomo,” 10/17/22)
- “Kim [Kardashian, Ye’s ex-wife] has Zionist media handlers surrounding her.” (Ye on “Piers Morgan Uncensored,” 10/19/22)
- “I said the Jewish people because, by the way, it’s a barrage...George Soros knows, like, ‘wow, this guy is like a younger guy that’s looking at what I did and looking at how I control the world silently and he’s calling it out’...That’s what George Soros sees, right, when he’s dealing with me.” (Ye on the “Lex Fridman Podcast,” 10/24/22)
- “The Zionist control — the 300 in control of the media and in control of the governments — they don’t want us to connect to each other...They want to separate and confuse the Christians and make us afraid to stand next to each other...The Zionists can get us so afraid that they’re gonna do what they’ve been

doing to me: attempting to put me in jail, freeze my accounts, smearing me on the media.” (Ye on “The Alex Jones Show” on InfoWars, 12/1/22)

- “Everyone is still controlled by the Jewish media.” (Ye on “The Alex Jones Show” on InfoWars, 12/1/22)
- “[Former President Obama] was actually just another Jewish president...Every president’s been Jewish since 1948.” (Ye on Clubhouse, 12/10/22)

Claims that Jews Exploit Black Artists for Financial Gain

Antisemitic tropes about alleged Jewish power and greed intersect in Ye’s comments about purported Jewish control of the music industry and exploitation of Black artists. This trope has been present in the discourse of other Black performers and activists in the past and is a common talking point within more extremist groups. Nation of Islam leader Louis Farrakhan, for example, frequently makes this accusation.

- “Jewish people have owned the Black voice...The Jewish community, especially in the music industry, in the entertainment [industry] period, they’ll take one of us, the brightest of us, right, that can really feed a whole village, and they’ll take us and milk us till we die.” (Ye on “Drink Champs,” 10/16/22)
- “There’s so many Black musicians signed to Jewish record labels and those Jewish records labels take ownership not only of the publishing...but also ownership of the culture itself...It’s like a modern-day slavery.” (Ye on “Cuomo,” 10/17/22)
- “I’ve been wronged so many times by Jewish businessmen...They’re taking money out of my children’s mouths and putting it into their children’s mouths!” (Ye on “Piers Morgan Uncensored,” 10/19/22)
- “90% of Black people in entertainment — from sports, to music, to acting — are in some way tied into Jewish businesspeople...Like if Rahm [Emanuel] is sitting next

to [President] Obama or Jared [Kushner] sitting next to [President] Trump, there's a Jewish person right there controlling the country, the Jewish people controlling who gets the best video or not, controlling what the media says about me." (Ye on the "Lex Fridman Podcast," 10/24/22)

- "The Armenians work in the meatpacking district and the Jews work in the n*****-packing district." (Ye on Clubhouse, 12/10/22)
- "I believe that Michael Jordan's dad was sacrificed. I believe—didn't something happen with Tiger Woods? My mom. These are all Zionist sacrifices that happened." (Ye on "The Alex Jones Show" on InfoWars, 12/1/22)

Claims that Jews Promote Harmful and Immoral Behaviors

Ye's assertions about supposed Jewish control of the entertainment industry and exploitation of Black artists overlap with the conspiratorial claims that known antisemites and extremists promote alleging that Jewish people seek to undermine other peoples and cultures. Abortion is a frequent area of focus for Ye, who has compared abortion to the Holocaust, spread false claims about abortion rates among Black people, and claimed that that Planned Parenthood was created as part of a collaboration between Margaret Sanger and the KKK in order to control the Black population.

These views are reminiscent of claims and [conspiracy theories](#) that have been promoted by antisemites and conspiracy theorists, such as the Nation of Islam and extremist Black Hebrew Israelite sects, who allege that there is a supposed "depopulation agenda" targeting Black people in the United States today. The notion of population control also connects to the broader ideology of these groups. While appearing on "Drink Champs" in 2022, Ye played a message that Nation of Islam leader Louis Farrakhan reportedly sent him in response to recent events; Farrakhan can be heard speaking in the voicemail about [Yakub](#), the evil Black scientist who,

according to the Nation of Islam, allegedly created the white race from the “Original Black Man” thousands of years ago through a process of “grafting” and “birth control.”

- “Even the information put in our music, the toxicity put in our music. There’s nothing promoting the idea of a king taking care of a queen and then taking care of the future kings and the future queens. It’s just us talking about killing each other and Jewish people getting paid off it.” (Ye on “Drink Champs,” 10/16/22)
- “A Jewish friend of mine said, ‘come, go visit the Holocaust Museum.’ And my response was, ‘let’s visit our Holocaust museum: Planned Parenthood...Six million people died in the Holocaust. Over 20 million have died by the hands of abortion. And the media promotes the ‘my body, my choice,’ which is actually still a promotion for Planned Parenthood. 50% of Black deaths a year is actually abortion. It’s not the cop with the knee, it’s not Black on Black violence and gang violence, not heart attacks—it’s actually abortion...That’s what we deal with on our TVs right now with Black people. Soros would use Black trauma economy to win an election.” (Ye on the “Lex Fridman Podcast,” 10/24/22)
- “It’s genocide and population control that Black people are in today in America that is promoted by the music — and the media — that Black people make, that Jewish record labels get paid off of.” (Ye on the “Lex Fridman Podcast,” 10/24/22)
- “[Celebrities are not criticizing fashion company Balenciaga for allegedly exploiting children] because they work for the Jews. They’re celebrities; they’re in Hollywood; we’re in Jew-town. New York and California are both Jew-town...That’s who they work for.” (Ye on Clubhouse, 12/10/22)

Challenging Antisemitism Accusations

When challenged about his recent antisemitic statements, Ye has repeatedly claimed that the label of “antisemite” is used as a smear to silence critics or censor the truth, recalling the excuses that antisemites have made in a variety of historical and contemporary cases. Antisemites often position themselves as truth-tellers, whose mission it is to unmask nefarious Jewish behavior or a supposed insidious Jewish plot to take over the world. Facing accusations of antisemitism in October 2022, Ye repeatedly claimed that he was fulfilling a God-given mission to expose the alleged improper contract practices used in the entertainment industry, which he blames on Jewish people.

- “I crossed the antisemite line. I crossed the gun line. I stood in front of the tank in Tiananmen Square. I’m saying, ‘look, this smokescreen that’s been created to make us so afraid to speak up for ourselves, this is just a smokescreen.’” (Ye on “Drink Champs,” 10/16/22)
- “I don’t like the term antisemitic. It’s been a term that’s allowed people, specifically in my industry, to get away with murder, sometimes literally, you know, and get away with robbing and doing bad.” (Ye on “Cuomo,” 10/17/22)
- “Antisemitism and the closeness of the Holocaust is used by certain individuals in media to not take accountability for the bad things that are happening.” (Ye on the “Lex Fridman Podcast,” 10/24/22)
- “Ultimately, I am fighting a battle in the spiritual form and anyone that believes in God and is looking at this interview would agree with that...These contracts need to be fixed. Everyone could be so mad at the messenger, right? ‘Ye, you said it the wrong way. You’re offensive. You’re like Hitler now because you said it, you said this out loud, you weren’t getting enough sleep.’ But all this shit does not negate the fact that we do have — Houston, we have a problem.” (Ye on the “Lex Fridman Podcast,” 10/24/22)

- “We got this word that has now been dispelled called ‘antisemitism,’ Netanyahu: the word doesn’t work anymore. I destroyed the word. It can’t be used.” (Ye on Clubhouse, 12/10/22)

Questioning Jewish Identity

In recent interviews and on social media, Ye has expressed the belief that Black people are Jews. These statements echo [Black Hebrew Israelite](#) ideology, which claims that Black people are the true descendants of the biblical Israelites. BHI adherents reject Judaism and are not the same as Black Jews or Jews of color. This type of rhetoric is also commonly espoused by members of the [Nation of Islam](#).

Some BHI sects are [explicitly antisemitic and extremist](#) and describe members of the mainstream Jewish community as “imposters” who stole the religious heritage of Black people. Extremist BHI and NOI adherents frequently emphasize that the “-ish” suffix of “Jewish,” both verbally and in writing, as an indication that those people who identify as Jewish and practice the religion of Judaism today are usurpers and not “[true Jews](#).” Ye’s defense that he cannot be antisemitic because Black people are Semites or Jews is an argument that BHI and NOI adherents also regularly employ when they are accused of antisemitism.

- “When I say ‘Jew,’ I mean the 12 lost tribes of Judah, the blood of Christ... the people known as the race ‘Black’ [sic], really are.” (Ye on “Tucker Carlson Tonight,” 10/6/22)
- “We are Semite, we Jew [sic], so I can’t be antisemite [sic].” (Ye on “Drink Champs,” 10/16/22)
- “Black people are also Jew [sic], I classify as Jew also, so I actually can’t be an antisemite.” (Ye on “Cuomo,” 10/17/22)

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- “I’m Jew, not Jewish. Jew-ish means ‘like that of a Jew’ I’m saying I’m Jew [sic].” (Ye on the “Lex Fridman Podcast,” 10/24/22)
- “We are ‘the Jew’ and they are ‘Jew-ish’: like that of a Jew.” (Ye on Clubhouse, 12/10/22)

Engaging in Holocaust Denial and Trivialization

During his December 1 appearance on InfoWars, Ye repeatedly professed his admiration for Adolf Hitler and Nazis. He also [disputed the facts of the Holocaust](#) and compared his deplatforming to the experience of Jews in the Holocaust. He has made similar statements about Hitler and the Holocaust in other interviews.

- “[The Nazis] did good things too. We gotta stop dissing Nazis all the time...The Jewish media has made us feel like the Nazis and Hitler have never offered anything of value to the world.” (Ye on “The Alex Jones Show” on InfoWars, 12/1/22)
- “[The Nazis] didn’t kill 6 million Jews; that’s just, like, factually incorrect.” (Ye on “The Alex Jones Show” on InfoWars, 12/1/22)
- “There’s Jewish people that are basically hiding me under their floorboards right now – under the wooden floors. It’s like a reverse version of the Holocaust.” (Ye on “The Alex Jones Show” on InfoWars, 12/1/22)
- “The Holocaust is not what happened. Let’s look at the facts of that. And Hitler has a lot of redeeming qualities.” (Ye on “The Alex Jones Show” on InfoWars, 12/1/22)

RELATED ITEMS

[Unpacking Kanye West’s Antisemitic Remarks](#)

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Exhibit CCC

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Kanye and Kyrie Spread Farrakhan's Bigotry

We no longer have the option to ignore it, writes Abe Foxman.

Nov. 10, 2022 12:58 pm ET



Kanye West, the rapper and mogul, at the White House, Oct. 11, 2018. PHOTO: KEVIN LAMARQUE/REUTERS

I agree with Abe Greenwald that it is absurd to call the anti-Semitism coming from Louis Farrakhan “white supremacy” (“Kanye West, Louis Farrakhan and the Jews,” Houses of Worship, Nov. 4). During my 50 years at the Anti-Defamation League, we frequently exposed and challenged Mr. Farrakhan’s anti-Semitism, calling him the most prominent black anti-Semite in the modern era.

The ADL described Mr. Farrakhan as one who “frequently denies that Jews have a legitimate claim to their religion and to the land of Israel, claiming that Judaism is nothing more than a ‘deceptive lie’ and a ‘theological error’ promoted by Jews to further their supposed control over America’s government and economy.” He preached black pride and anti-Semitism at rallies, in houses of worship, on radio, on TV and in print. But whenever we condemned it, we were

told by black and white leaders to ignore him, as he was fringe, without influence. They wouldn't condemn him, of course, arguing that his message of black pride was more important.

Today, we are witnessing this policy's poisoned fruit. Kanye West and Kyrie Irving have absorbed this anti-Semitism and now spread it as their own message. While Mr. Farrakhan no longer commands the numbers he once had for his hate, Messrs. West and Irving do it for him, poisoning the minds of some young blacks who see them as role models. The time has come for civil-rights leadership, black and white, to exorcise this anti-Semitism from civil discourse. We no longer have the option to ignore it.

Abraham Foxman

Bergen County, N.J.

Mr. Foxman is national director emeritus of the ADL.

Appeared in the November 11, 2022, print edition as 'Kanye and Kyrie Spread Farrakhan's Bigotry'.

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Exhibit JJJ-2

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Following Farrakhan's Latest Anti-Semitic Rant, Wiesenthal Center Asks: What Will It Take For Political Leaders And National Media To Call Him Out?

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March 6, 2018

Leaders of the Simon Wiesenthal Center, a leading Jewish Human Rights NGO denounced the continuing parade of American politicians and social activists who meet with longtime race baiter and avowed anti-Semite, Rev. Louis Farrakhan.

“Farrakhan has never hidden his hatred for the Jewish people,” charged Rabbis Marvin Hier and Abraham Cooper Dean and Founder and Associate Dean and Director of Social Action for the SWC. **“His infamous bigoted one-liners include Hitler was ‘a very great man’ and Judaism as ‘a dirty (or gutter) religion’, how about his current barnstorming campaign, that’s been ongoing since 2015, during which he’s lambasted ‘wicked ones in the Jewish community that run America, run the government, run the world, own the banks, own the means of communication. They are my enemies!’”**

Rabbi Hier and Cooper continued, **“Every year without fail, he continues to besmirch ‘Zionist Jews’ for being behind the 9/11 attacks. Farrakhan’s rants include ‘The Satanic Jews that control everything and mostly everybody, if they are your enemy, then you must be somebody.’”** Farrakhan insta-messaged “Mr. Trump”: **“You say, ‘America first.’ America is never first. Israel is always first. Ask any Jew, even your son-in-law.”**

Just last month, at his annual Saviours’ Day 2018, Farrakhan declared in his keynote, **“Jews were responsible for all of this filth and degenerate behavior that Hollywood is putting out, turning men into women and women into men...”** adding, **“White folks are going down. And Satan is going down. And Farrakhan, by God’s grace, has pulled a cover off of that Satanic Jew, and I’m here to say your time is up, your world is through,”** he screamed.

“High profile leaders in the Women’s March, Tamika Mallory, Carmen Perez, and Linda Sarsour, refused to condemn Farrakhan’s obsession and Jew-hatred,” the Wiesenthal Center officials said, adding, **“The lack of courageous leadership in standing up to such bigotry is deeply distressing.”**

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Hier and Cooper pointed to Ira A. Lipman, a national Civil Rights leader set to receive the Simon Wiesenthal Center's Humanitarian Award on May 30th in New York, who denounced Farrakhan over a quarter of a century ago, when the then-Memphis Mayor, W.W. Herenton, claiming he was unaware of Farrakhan's bigotry made him an honorary citizen of Memphis. Lipman was so outraged that he called the Mayor a "liar" and a "fool" for him to do this to a guy who has a huge hate record, is just unbelievable. **"It's very troublesome that I have to live in a city that has honored Louis Farrakhan,"** Mr. Lipman said.

For more information, please contact the Center's Communications Department, 310-553-9036. Join the Center on Facebook, www.facebook.com/simonwiesenthalcenter, or follow @simonwiesenthal for news updates sent direct to your Twitter feed.

The Simon Wiesenthal Center is one of the largest international Jewish human rights organizations with over 400,000 member families in the United States. It is an NGO at international agencies including the United Nations, UNESCO, the OSCE, the OAS, the Council of Europe and the Latin American Parliament (Parlatino).

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

_____	:	
MINISTER LOUIS FARRAKHAN and	:	
THE NATION OF ISLAM,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	Civil Action No. 1:23-cv-09110
	:	NOTICE OF APPEAL
	:	
ANTI-DEFAMATION LEAGUE,	:	
JONATHAN GREENBLATT, individually,	:	
and in his official capacity as CEO and National	:	
Director of the ANTI-DEFAMATION LEAGUE,	:	
SIMON WIESENTHAL CENTER, and RABBI	:	
ABRAHAM COOPER, individually and in his	:	
official capacity as Director of Global Social Action:	:	
Agenda for the SIMON WIESENTHAL CENTER,	:	
	:	
Defendants.	:	
_____	:	

PLAINTIFFS' NOTICE OF APPEAL

Notice is hereby given that the following parties: The Honorable Minister Farrakhan and the Nation of Islam (Plaintiffs) in the above captioned case appeal to the United States Court of Appeals for the Second Circuit from the Final Judgment entered in this action on April 5, 2024.

Dated: May 3, 2024

Respectfully submitted,

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All *Pro Hac Vice* Applications Were Granted

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