

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

MAXWELL LONG)	
)	
and)	
)	
MICHAEL KAMINSKY,)	
)	
Plaintiffs,)	
)	
v.)	No.
)	
)	
DEPAUL UNIVERSITY,)	
)	
)	
Defendant.)	JURY TRIAL DEMANDED

COMPLAINT

Plaintiffs, Maxwell Long (“Max”) and Michael Kaminsky (“Michael”) (each, a “Plaintiff” and, together, “the Plaintiffs”), by and through their attorneys, GRANT & EISENHOFER, P.A. and The Lawfare Project, and complaining of Defendant DEPAUL UNIVERSITY (“DePaul” or “Defendant”) arising from its negligent, grossly negligent, careless, reckless, intentional, willful, wanton, and outrageous conduct and, in accordance with the Illinois Code of Civil Procedure, state as follows:

NATURE OF THE ACTION

1. This action arises out of Defendant’s negligent, careless and reckless conduct, which caused injuries to DePaul University students Max and Michael on or about November 6, 2024, while they were lawfully on DePaul’s Lincoln Park campus, located at 2250 N. Sheffield Ave., Chicago, IL 606014 (“Lincoln Park campus”).

2. Before November 6, 2024, there had been repeated acts of violence and other criminal behavior on DePaul's Lincoln Park campus against Jewish and/or Israeli students, including acts against Max and Michael.

3. Despite the clear pattern and history of antisemitism and related violent activity on and around its campus, DePaul was, and still is, an extremely dangerous college campus due to the profound safety and security failures of its Public Safety Office, especially for Jewish and/or Israeli students.

4. Defendant's failures culminated into the events that transpired on November 6, 2024 when, as a natural, probable, and foreseeable result of its negligent, careless and reckless conduct, two masked individuals descended on its campus and violently assaulted Max and Michael while they were simply standing in the main courtyard of the Lincoln Park campus, leading to each of them to sustain significant physical and psychological injuries.

5. As detailed herein, the November 6, 2024 criminal activity was foreseeable to Defendant. Despite knowing about the storied history of violent antisemitism on campus, DePaul failed to do anything to secure its campus from such criminal activity, prevent criminal activity from occurring, discover criminal activity as it was occurring, adequately respond to said activity, or adequately warn DePaul campus residents, students, and visitors about the potential for criminal activity to enable them to avoid the harm or otherwise protect themselves from it.

6. As a natural, probable, and foreseeable result of Defendant's acts or omissions, Plaintiffs, both DePaul students and business invitees on DePaul's campus, were violently attacked and sustained permanent and debilitating injuries.

JURISDICTION AND VENUE

7. This Court has jurisdiction over this matter pursuant to 735 ILCS § 5/2-209 in that all parties relevant to this action reside and/or hold one of their principal places of business in the State of Illinois.

8. Venue is proper in this court pursuant to 735 ILCS § 5/2-101 in that all or a substantial part of the events giving rise to the causes of action alleged herein occurred within Cook County.

THE PARTIES

9. Plaintiff Max Long resides in Illinois and is a DePaul University student. Max immigrated to Israel in 2015 and served in the Israel Defense Forces (“IDF”). Max is currently a freshman at DePaul studying Business. In addition to attending classes, Max also works full-time at a non-profit that he founded. Upon being released from the IDF Reserves, he was inspired to use his personal experience to educate his classmates about Israel and the war in Gaza, which was prompted by the pervasive atmosphere of antisemitism and anti-Israel rhetoric that the school had permitted to infiltrate its campus.

10. Plaintiff Michael Kaminsky resides in Illinois and is a junior at DePaul studying Criminology. Michael is very involved with Jewish life on campus and is a founding member of DePaul’s chapter of Students Supporting Israel (“SSI”).

11. Defendant DePaul University is a private, non-profit institution incorporated in Illinois and located at 1 E. Jackson Blvd., Chicago, Cook County, Illinois 60604. Its Public Safety Department is an office within DePaul which claims to be accessible 24 hours per day and staffed by trained professional Public Safety Officers. The Lincoln Park Office of the Public Safety

Department (referred to herein as the “Public Safety Office”) is located at 2345 N. Sheffield Ave., Centennial Hall, 304, Chicago, Cook County, Illinois 60604.

12. The attack that is the subject of this Complaint occurred at DePaul’s Lincoln Park campus, which is located at 2400 N. Sheffield Ave., Chicago, IL 60614 (hereinafter referred to as the “Lincoln Park campus” or the “Premises”).

FACTUAL AVERMENTS

History of Antisemitism and Violent Acts against Jewish Students on DePaul’s Campus

13. November 6, 2024 was not the first time Jewish students felt unsafe on DePaul’s campus. Jewish and Israeli students have publicly reported fearing for their safety on DePaul University’s campus for over a decade. Despite being acutely aware of the violent anti-Jewish rhetoric permeating throughout its campus for years, DePaul has failed to take any decisive action against this hate, and has instead fostered an environment in which students and faculty members are permitted to repeatedly act in ways which place Jewish and Israeli students in harm’s way.

14. The brutal attack against the Plaintiffs in this case was the clear and foreseeable result of the historical and continued failure of DePaul’s administration to adequately address the violent antisemitic rhetoric on its campus and take appropriate steps to protect its Jewish and Israeli students; the injuries and damages to the Plaintiffs were likewise foreseeable especially given that DePaul’s Public Safety Office failed to take reasonable measures to prevent the attack from occurring, failed to intervene during the attack itself, and, instead, fostered an environment where rampant antisemitism was broadcast with impunity.

15. The latest and worst outbreak of antisemitism at DePaul occurred in the wake of October 7, 2023, when Hamas terrorists invaded the state of Israel and tortured, raped, slaughtered, burned, mutilated, and kidnapped over 1,200 people, including infants, children, and the elderly,

and young people attending a music festival, in what would be the deadliest day for Jews since the Holocaust.

Recent Threats to Jewish Students on Campus

16. Almost immediately after the events of October 7, 2023, DePaul's campus was inundated with stickers, graffiti, posters and flyers containing antisemitic symbols and messages, many of which explicitly called for violence against Jews and Israelis.

17. Jewish and Israeli students at DePaul were also forced to endure dozens of protests on their campus in the wake of October 7. During these protests, groups of pro-Hamas students acting in a mob-like fashion openly advocated for violence against Jews and Israelis, displayed antisemitic signs and broadcasted hostile anti-Jewish and anti-Israel messages that reverberated through every building on campus.

18. On October 18, 2023, the student group Students for Justice in Palestine ("SJP") at DePaul held a protest on campus during which they called for an "intifada Revolution," a violent chant which DePaul's Jewish student community explained to DePaul was a call for terrorist attacks to be perpetrated against Jewish civilians, including DePaul's Jewish students.

19. After the October 18 protest, Jewish student leaders contacted DePaul administration to express that Jewish students on DePaul's campus were "feeling increasingly scared" and to make clear that "the safety of [the Jewish] community [was] threatened" by the actions of the protestors, who DePaul had inexplicably permitted to take over its campus despite their blatant violations of several DePaul University rules.

20. The following day, on October 19, 2023, a protest on campus resulted in the physical assault of a Jewish student. This incident was promptly reported to DePaul administration, yet no action was taken by the school to prevent future violent incidents.

21. On April 29, 2024, groups of pro-Palestine and pro-Hamas students set up an encampment on DePaul's Lincoln Park campus. Despite admitting to receiving over 1,000 registered complaints regarding the encampment, DePaul permitted the students of the encampment to take over its campus and completely disrupt its operations for several weeks.

22. During the time of the pro-Palestine encampment, DePaul hired a private security company to help secure its campus.

23. On May 9, 2024, DePaul issued a public safety alert acknowledging that a student holding an Israeli flag was a victim of a battery around the encampment area.

24. On May 16, 2024, after DePaul finally took steps to dismantle the student encampment on campus, DePaul's President, Robert L. Manual, published an official statement regarding the decision, which provided, among other things, that:

- a. The school was "aware of a death threat against a student and reports of individuals threatening to slit the throats of people they perceive to be Jewish or in support of the Israeli state," and
- b. The threats made against Jewish and Israeli students during the encampment "have been accompanied by signs implicitly and explicitly advocating for violence."¹

25. DePaul also published a report to its website (which they have since removed) entitled "Threats to Safety and Disruption of Campus Operations."² This report contained a "selection of the many social media posts, images, data, and quotes that exemplify the escalation of the impact of the encampment on DePaul's Lincoln Park quad from a peaceful protest to an unsafe and intimidating environment for all DePaul and local community members." Some highlights of this report included the following:

¹ See Robert Manual, May 16, 2024 "Encampment removal" at <https://offices.depaul.edu/president/notes-from-rob/2023-2024/Pages/encampment-removal.aspx>, last accessed March 5, 2025, attached hereto as Exhibit A.

² See Threats to Safety and Disruption of Campus Operations, attached hereto as Exhibit B.

- a. During the student encampments, DePaul received 625+ registered complaints from neighbors and community members, as well as 425+ registered complaints from students, faculty and staff, and parents.
- b. As was self-reported by DePaul, among these complaints included at least one death threat, 13 harassment allegations, 16 instances of intimidation, 4 credible threats of violence, 34 reports of antisemitism, 77 reports of individual safety concerns, and 4 allegations of battery.
- c. The report also included several pictures from the encampment, including pictures depicting antisemitic rhetoric explicitly calling for violence against Jewish and Israeli students. Some examples of such pictures are included below:





- d. Moreover, the school also admitted in the report that weapons were found in the encampment while dismantling it, including several knives, a pellet gun and other improvised weapons intended to cause harm. Notably, these were the weapons that were left in the encampment at the time that it was dismantled; it does not include any other weapons that the students may have armed themselves with during the encampment, but that were removed prior to its dismantlement. A picture of some of the weapons confiscated from the encampment that were included within the report is below:



- e. The report further included pictures of “traps” left outside the encampment, which included wooden planks with long nails sticking out:



- f. The report also included language from some of the complaints received by the school regarding the encampment. Some highlights of these complaints include the following:

A Jewish student reported to Public Safety that she was followed through the Quad where she overheard “I want to kill her” and “I want to rape her”; threatened with a fight; told, “you’re Jewish scum”; and she began to cry.

A Jewish and Israeli student who reported that they “have not slept for the past three nights because of the calls outside of my window for an intifada” and that he has “nowhere safe to go as an out-of-state student.”

“No student should feel the need to be ‘escorted’ to walk across our Lincoln Park campus during broad daylight. This is the reality we are facing as Jewish students on campus at DePaul.”

“I am horrified by the banner that is showcasing our Quad this morning I understand that everyone has the right to protest but having a banner with a man pointing a rifle to a kid is horrific!!...[I]t is over all insinuating violence.”

“I am unsure whether the university understands how hurtful and honestly scary it is to see my peers, friends, and professors chanting whether consciously or not, for the harm of Israel and Zionists, or Jews for that matter.”

“As we walked home this past Sunday afternoon, a group of seven men completely covered up from head to toe, walked up and down Belden intimidating people. How are you allowing this on your campus grounds in 2024?”

26. Even after the dismantling of the encampment, the threats of violence against Jewish and Israeli students on DePaul’s campus continued. For example, on May 29, 2024, DePaul Divest Coalition organized a building “sit-in” protest, during which students littered the halls with antisemitic flyers and posters, vandalized bathrooms, and disrupted classes, depicted below:



27. Upon information and belief, DePaul hired a private security company at some point during this period due to the safety concerns posed by the encampments and the threats being

made to and against DePaul's Lincoln Park students. However, given the extent of danger, this company was not enough to ensure the safety of DePaul's students.

28. Despite knowing that its students were in danger, especially its Jewish and Israeli students, Defendant failed to take reasonable and necessary actions to preserve the safety of its campus prior to Plaintiffs' attacks.

The Foreseeability of the November 6, 2024 Attack on Plaintiffs Specifically

29. Not only did Defendant know about the repeated threats and acts of violence individuals made towards DePaul's Jewish community in general, Defendant was also acutely aware that Max and Michael specifically were being targeted by antisemitic rhetoric and escalating threats of violence prior to the November 6 attack.

30. For example, during an October 25, 2023 SJP protest, Michael and another Jewish student were verbally threatened with physical harm by a protester. Specifically, the protestor threatened Michael that he would "smack the fucking shit out of [his] fucking face." Groups of students who participated in the protest recorded this interaction and posted it on social media, labeling Michael as a liar and putting a target on his back for future harm.

31. Michael immediately submitted an official report of "Discrimination/Harassment" to Defendant.

32. In his report, Michael expressed that this incident was just "one of several incidents of being a Jewish student on campus and not feeling safe while public safety and police do nothing." He provided photographic evidence of the attack, including an antisemitic sign at the heart of the attack, and a photograph of the individual who threatened him.

33. No Public Safety Officers intervened in the attack, despite being present on scene and witnessing Michael's harassment.

34. On October 7, 2024, after an event related to the anniversary of Hamas's October 7, 2023, attack, Michael had another altercation with a DePaul student, whose identity is known to Plaintiffs and to Defendant. The student approached Michael in a threatening manner and said, "I should spit on you."

35. Michael reported this incident of harassment to Defendant and submitted a video recording of the encounter. Leslie Watland, DePaul's Associate Dean of Students, responded and met with Michael regarding the report.

36. On or about October 13, 2024, with the express knowledge and permission of DePaul's Public Safety Office, Max began holding information sessions in front of DePaul's Student Center on its Lincoln Park campus every Wednesday.

37. During these sessions, Max wore a sign that read, "Come talk about Israel with an IDF Soldier." Max's intent was to peacefully engage fellow DePaul students in thoughtful dialogue about Israel and the ongoing conflict.

38. Defendant and its Public Safety Office were aware of Max's activities on the Lincoln Park campus each time he did so. At the beginning of each session, a DePaul Public Safety Officer approached Max and asked for his student credentials.

39. On more than one occasion during these sessions, Max was verbally harassed by Pro-Palestinian students who approached his table.

40. After witnessing one of these instances of harassment, Michael began accompanying Max during these sessions. Michael continued to stand with Max in the weeks that followed.

41. On or about October 25, 2024, Max and Michael were informed by one of the private security officers that DePaul's contract with the private security company—hired because

of the safety concerns—was set to end effective November 1. There were no material changes to the safety of DePaul’s students in November 2024 that would warrant Defendant lessening campus security.

42. On October 30, 2024, Max had an altercation on campus with the same DePaul student who harassed Michael on October 7, 2024.

43. During this altercation, Max was approached by that student, who told him, “in any other circumstance, [Max] would find [himself] bleeding and on the ground.”

44. Max never approached the individual and never said anything remotely incendiary to provoke such violent rhetoric.

45. Both Max and Michael reported the incident to the school. Max reported that this same individual approached him weekly. He explicitly informed Defendant before November 6, 2024, that he feared that he didn’t have a safe space on campus.

46. On November 1, 2024, Max met with Leslie Watland to discuss the threats made against him on October 30.

47. Despite the repeated threats of violence against Max, Michael, and the Jewish community on DePaul’s campus as a whole, Ms. Watland informed Max that DePaul’s contract with the private security company was ending the following Monday, November 4, 2024, and would not be renewed.

48. Defendant did not replace the private security company with any equivalent safety measures, let alone increase its security or take any measures whatsoever to protect Max or Michael after learning of the violent threats made against the two students.

49. Additionally, because DePaul was making statements regarding the cancellation of the private security contract to its students, not only did said cancellation leave its Jewish students

vulnerable to attack, it also provided an opportunity for the attackers to plan their specific attack on Max and Michael for a time when they knew that the security on campus would be lacking.

50. On November 6, 2024, the following Wednesday, and the day of the week that Max had consistently been holding these ‘ask me anything’ sessions, Ms. Watland emailed Max and Michael that she was meeting with the student harasser from the October 30, 2024 incident. Ms. Watland supposedly issued a no-contact directive between the offending student, Max, and Michael.

51. Later that afternoon, Max went to the Student Center on the Lincoln Park campus, as normal.

52. A Public Safety Officer approached Max, as he had done on each previous occasion, to make sure that Max stayed in a certain area during the session.

53. Max offered to present his student ID to the officer, who said that it was unnecessary as he remembered Max’s ID from prior occasions. The Public Safety Officer positioned himself approximately 10 feet from where Max was standing and, prior to doing so, said, “as always, I am around if anything happens for everyone’s safety.”

54. Given the escalating violence, Michael then joined Max for this session.

55. As Michael and Max were standing outside the Student Center, Max was approached by a male wearing a ski mask. The ski-masked individual initiated a conversation with Max.

56. Despite the fact that the man was ski-masked in early November, the Public Safety Officer did not approach the group or take any other action to deescalate the situation or to intervene.

57. Then, suddenly and without warning, a second masked individual approached Max from behind and began repeatedly striking Max with a closed fist.

58. Max fell to the ground, where both masked individuals continued to beat him with their fists and, upon information and belief, a soda can or water bottle.

59. The Public Safety Officer, stationed just 10 feet away, did not approach to deescalate the situation or to intervene and save Max from being attacked.

60. As Max was brought to the ground, and because Defendant offered no emergent assistance whatsoever, Michael attempted to intervene on his own to save his friend.

61. Michael was pushed forcefully to the ground by one of the assailants too, and that assailant then began punching and beating Michael with a closed fist.

62. The Public Safety Officer did not approach to deescalate the situation or to intervene and save Michael from being attacked.

63. After beating up Max and Michael, the assailants subsequently fled in opposite directions. At that point, a different Public Safety Officer stopped one of the assailants, but then inexplicably let him go.

64. The Public Safety Officer who had approached Max previously witnessed the entire attack on the two DePaul students, but did nothing to intervene, despite being close enough to do so.

65. Not only did Defendant fail to prevent the foreseeable attack, or implement reasonable safety measures to deter the criminal conduct, but equally disturbing, its Public Safety Office witnessed and observed DePaul students being attacked on DePaul's campus and did nothing to stop it.

66. Following the attack, DePaul reported this incident to the Chicago Police Department (“CPD”) to determine whether to classify the attack as a hate crime. On November 7, 2024, the Public Safety Office relayed that the CPD classified the attack as a hate crime.

67. On November 7, 2024, Max and Michael both sought emergent medical treatment due to the injuries they sustained as a result of the November 6, 2024 attack. Max was subsequently diagnosed with a concussion and resulting injuries, in addition to the contusions and bruising from the assault, and Michael was subsequently diagnosed with a fracture and other traumatic injuries to his wrist, which ultimately required surgery.

68. On or about November 12, 2024, Michael and Max were approached by a private security officer contracted by the school. That private security officer told Max and Michael that the private security contract had been renewed since their attack. Of course, that renewal came too late and did nothing to stop their attack on November 6.

69. Even though two of its students were physically assaulted in broad daylight on its campus, Defendant *still* has not implemented reasonable measures to ensure the safety of its students, including Max and Michael, further evincing the school’s deliberate indifference to protecting its Jewish and Israeli students, among others.

70. Max, specifically, has been the ongoing subject of an even greater hate campaign both online and on and around campus since the November attack.

71. Social media accounts and campus groups have distributed flyers and made posts broadcasting him as a “wanted” person and referring to him as an “IDF butcher.” These flyers, which show Max’s face, declare that Max “got what he deserved,” an obvious reference to his November attack.

72. Additionally, after the attack, social media posts have identified Michael and referred to him as a “pro-genocide student,” which is offensive language that serves no purpose other than to further incite violence against Michael.

73. On November 27, 2024, *20 days after they were attacked*, DePaul, upon information and belief, had concluded its investigation into Max’s and Michael’s October 7 and 30 harassment complaints against the DePaul student, finding that the student had, in fact, violated the University’s Anti-Harassment Policy.

74. This finding came far too late, of course, given that Max and Michael were attacked on November 6.

75. As a natural, probable, and proximate result of Defendant’s negligent, careless and reckless conduct, Plaintiffs were criminally attacked and assaulted on DePaul’s Lincoln Park campus and sustained severe physical and mental injuries.

76. Max Long’s physical and mental injuries from the attack include, but are not limited to: (1) a head injury; (2) concussion; (3) contusions to his neck, jaw, and back; (4) abrasions of multiple sites; (5) mental pain and suffering; (6) embarrassment and humiliation; (7) psychological injuries, including depression, anxiety, and the loss of capacity for the enjoyment of life, (8) scarring, (9) permanent disfigurement, and (10) disability.

77. Michael Kaminsky’s physical and mental injuries from the attack include, but are not limited to: (1) contusions; (2) abrasions of multiple sites; (3) a left wrist fracture; (4) trauma-induced carpal tunnel syndrome; (5) Wartenberg syndrome; (6) mental pain and suffering; (7) embarrassment and humiliation; (8) psychological injuries, including depression, anxiety, and the loss of capacity for the enjoyment of life; (9) permanent disfigurement; and (10) disability.

78. Plaintiffs' injuries and damages were not caused by any act or omission on Plaintiffs' part.

COUNT I
Negligence
(Plaintiffs Against Defendant)

79. Plaintiffs restate and reallege by reference the foregoing paragraphs as though fully set forth herein.

80. At all relevant times, Defendant owned, controlled, maintained and/or were responsible for the supervision, control, security, safeguarding, and/or oversight of the Premises.

81. Defendant owed a duty to all DePaul students, visitors, and invitees, including Plaintiffs, to exercise reasonable and ordinary care to keep and maintain the Premises in a condition reasonably safe for public use. In particular, Defendant had a duty to take such precautions as were reasonably necessary to protect all lawful business invitees, including Plaintiffs, from criminal attacks which were reasonably foreseeable.

82. Defendant knew, or in the exercise of reasonable care, should have known, that the Premises and the area immediately surrounding the Premises was dangerous, that there had been numerous antisemitic attacks, extremely incendiary and violent rhetoric towards Jewish and Israeli DePaul students, specifically, and that criminal acts and attacks were reasonably likely to be perpetrated on DePaul's campus against DePaul's Jewish and Israeli students given this history, unless Defendant took steps to provide proper security to such individuals.

83. Defendant knew, or in the exercise of reasonable care, should have known, that Max Long and Michael Kaminsky had been the specific targets of violent antisemitic rhetoric, that direct threats of violence had been lodged against them while they were peacefully existing on the Premises on prior occasions, and that criminal acts and attacks against the two of them were

reasonably likely to be perpetrated on the Premises given this history unless Defendant took steps to provide proper security to such individuals.

84. Defendant knew, or in the exercise of reasonable care should have known, that no individual, including Plaintiffs, had within their own power to take the measures necessary to provide for their own safety and security on the Premises.

85. Defendant's failure to implement reasonable and necessary security measures was negligent, careless, reckless, intentional, willful, wanton, and outrageous given the pervasive violence plaguing its campus for an entire year preceding the attacks.

86. Defendant's failure to intervene when Max and Michael were being beaten on the Premises was intentional, willful, wanton, and outrageous.

87. Defendant breached its duty of reasonable care for the safety and protection of the public and the Plaintiffs in the following ways:

- a. by failing to provide adequate security for all lawful visitors and students on the Premises, including Plaintiffs;
- b. by failing to have an adequate number of security personnel to protect the lawful visitors and students on the Premises, including Plaintiffs;
- c. by failing to have competent security personnel to protect visitors and students on the Premises, including Plaintiffs;
- d. by failing to properly train security personnel to protect lawful visitors and students on the Premises, including Plaintiffs;
- e. by failing to provide security personnel with the tools and resources necessary to act in emergent situations impacting lawful visitors and students on the Premises, including Plaintiffs.
- f. by failing to have a sufficient number of security personnel in visible areas to deter crime and thereby protecting lawful visitors and students on the Premises, including Plaintiffs;

- g. by failing to provide reasonable and adequate instruction and/or supervision to employees, agents, representatives, servants and/or security personnel in connection with the safety of campus events;
- h. by failing to take additional security measures after being put on notice by prior instances and criminal activity that security measures were inadequate;
- i. by failing to reasonably and effectively utilize and monitor existing security devices in place, including surveillance cameras;
- j. by failing to warn, protect, guard, and secure the safety of Plaintiffs or other similarly situated students, when the Defendant knew or should have known of the existence of antisemitism and the danger to those individuals on the Premises;
- k. by failing to implement adequate security policies, security measures, and security proceedings necessary to protect Plaintiffs and other individuals on the Premises;
- l. by failing to implement adequate security policies, security measures, and security proceedings necessary to protect Plaintiffs and other individuals on the Premises;
- m. by failing to police, patrol, guard, deter, and otherwise provide adequate protection for individuals on the Premises, when Defendant knew or should have known of the foreseeable criminal acts;
- n. by cancelling and/or failing to renew the private security contract despite the violence occurring on campus in the days prior to the contract's expiration;
- o. by failing to have adequate control measures in place to ensure the safety of Jewish and Israeli students given the prolific calls for violence against the same;
- p. by failing to develop a safety and security plan for Jewish and Israeli students given the prolific calls for violence against the same;
- q. by failing to ensure adequate security presence on the Premises to deter criminal conduct;
- r. by failing to provide a safe place for its students and visitors;
- s. by failing to take any steps to increase security, despite knowledge of prior antisemitism on the campus and prolific calls for violence against Jewish and Israeli students;
- t. by failing to take any meaningful steps to contain or diminish the proliferation of violent antisemitic rhetoric permeating its campus, including by failing to enforce its own policies and rules against students participating in illegal protest activities on campus and in the surrounding areas;

- u. by failing to oversee and/or supervise existing security measures to ensure that such measures were being properly performed;
- v. by failing to employ reasonable and readily-available access control methods;
- w. by failing to employ reasonable and readily-available natural surveillance methods;
- x. by failing to secure the perimeter of the Premises to prevent individuals without a lawful purpose from coming onto the Premises;
- y. by failing to remove individuals from the Premises without a lawful purpose when Defendant knew or should have known of their existence;
- z. by failing to intervene while two DePaul students were assaulted on the Premises;
- aa. by failing to provide security personnel with the resources and tools necessary to intervene when two DePaul students were assaulted on the Premises;
- bb. by failing to provide necessary medical treatment to Plaintiffs; and
- cc. were otherwise careless and negligent.

88. As a natural, probable, and proximate result of Defendant's negligence, carelessness, reckless conduct and omissions, and intentional, willful, wanton, and outrageous acts and failures to act as described above, Plaintiffs were criminally attacked and assaulted on the Premises and sustained severe physical injuries, mental pain and suffering, psychological injuries, scarring, disability, permanent disfigurement, and the loss of the capacity for the enjoyment of life.

89. As a natural, probable, and proximate result of Defendant's negligence, carelessness and reckless conduct and omissions, and intentional, willful, wanton, and outrageous acts and failures to act as described above, Plaintiffs have incurred significant past and future medical expenses, which are ongoing and continuing in nature.

90. As a natural, probable, and proximate result of Defendant's conduct, Plaintiffs sustained pain and suffering and will continue to sustain pain and suffering, post-traumatic stress, severe psychological and emotional distress, mental anguish, loss of a normal life, embarrassment,

and humiliation, medical expenses and will continued to sustain medical expenses along with the physical injuries identified in paragraphs 76 and 77 of this Complaint.

COUNT II
Negligent Infliction of Emotional Distress
(Max Long Against Defendant)

91. Plaintiff Max Long restates and realleges by reference the foregoing paragraphs as though fully set forth herein.

92. At all relevant times, Defendant owned, controlled, maintained and/or were responsible for the supervision, control, security, safeguarding, and/or oversight of the Premises.

93. Defendant owed a duty to all DePaul students and visitors, including Max, to exercise reasonable and ordinary care to keep and maintain the Premises in a condition reasonably safe for the use of the public. In particular, Defendant had a duty to take such precautions as were reasonably necessary to protect all lawful business invitees, including Max, from criminal attacks which were reasonably foreseeable.

94. Defendant knew, or in the exercise of reasonable care, should have known, that the Premises and the area immediately surrounding its Premises was dangerous, that there had been numerous antisemitic attacks, extremely incendiary and violent rhetoric towards Jewish and Israeli DePaul students specifically, and that criminal acts and attacks were reasonably likely to be perpetrated on DePaul's campus given this history, unless Defendant took steps to provide proper security to such individuals.

95. Defendant knew, or in the exercise of reasonable care, should have known that Max had been the specific target of violent antisemitic rhetoric, that direct threats of violence had been lodged against him while he was peacefully existing on the Premises on prior occasions, and that

criminal acts and attacks against him were reasonably likely to be perpetrated on the Premises given this history unless Defendant took steps to provide proper security.

96. Defendant breached its duty of reasonable care for the safety and protection of Max in all or more of the following ways:

- a. by failing to provide adequate security for all lawful visitors and students on the Premises, including Plaintiffs;
- b. by failing to have an adequate number of security personnel to protect the lawful visitors and students on the Premises, including Plaintiffs;
- c. by failing to have competent security personnel to protect visitors and students on the Premises, including Plaintiffs;
- d. by failing to properly train security personnel to protect lawful visitors and students on the Premises, including Plaintiffs;
- e. by failing to provide security personnel with the tools and resources necessary to act in emergent situations impacting lawful visitors and students on the Premises, including Plaintiffs.
- f. by failing to have a sufficient number of security personnel in visible areas to deter crime and thereby protecting lawful visitors and students on the Premises, including Plaintiffs;
- g. by failing to provide reasonable and adequate instruction and/or supervision to employees, agents, representatives, servants and/or security personnel in connection with the safety of campus events;
- h. by failing to take additional security measures after being put on notice by prior instances and criminal activity that security measures were inadequate;
- i. by failing to reasonably and effectively utilize and monitor existing security devices in place, including surveillance cameras;
- j. by failing to warn, protect, guard, and secure the safety of Plaintiffs or other similarly situated students, when the Defendant knew or should have known of the existence of antisemitism and the danger to those individuals on the Premises;
- k. by failing to implement adequate security policies, security measures, and security proceedings necessary to protect Plaintiffs and other individuals on the Premises;

- l. by failing to implement adequate security policies, security measures, and security proceedings necessary to protect Plaintiffs and other individuals on the Premises;
- m. by failing to police, patrol, guard, deter, and otherwise provide adequate protection for individuals on the Premises, when Defendant knew or should have known of the foreseeable criminal acts;
- n. by cancelling and/or failing to renew the private security contract despite the violence occurring on campus in the days prior to the contract's expiration;
- o. by failing to have adequate control measures in place to ensure the safety of Jewish and Israeli students given the prolific calls for violence against the same;
- p. by failing to develop a safety and security plan for Jewish and Israeli students given the prolific calls for violence against the same;
- q. by failing to ensure adequate security presence on the Premises to deter criminal conduct;
- r. by failing to provide a safe place for its students and visitors;
- s. by failing to take any steps to increase security, despite knowledge of prior antisemitism on the campus and prolific calls for violence against Jewish and Israeli students;
- t. by failing to take any meaningful steps to contain or diminish the proliferation of violent antisemitic rhetoric permeating its campus, including by failing to enforce its own policies and rules against students participating in illegal protest activities on campus and in the surrounding areas;
- u. by failing to oversee and/or supervise existing security measures to ensure that such measures were being properly performed;
- v. by failing to employ reasonable and readily-available access control methods;
- w. by failing to employ reasonable and readily-available natural surveillance methods;
- x. by failing to secure the perimeter of the Premises to prevent individuals without a lawful purpose from coming onto the Premises;
- y. by failing to remove individuals from the Premises without a lawful purpose when Defendant knew or should have known of their existence;
- z. by failing to intervene when two DePaul students were being brazenly beaten in broad daylight on the Premises;

- aa. by failing to provide security personnel with the resources and tools necessary to intervene when two DePaul students were being brazenly beaten in broad daylight on the Premises;
- bb. by failing to provide necessary medical treatment to Plaintiffs; and
- cc. were otherwise careless, reckless and/or negligent

97. As a natural, probable, and proximate result of Defendant's conduct, Max sustained pain and suffering, post-traumatic stress, severe psychological and emotional distress, mental anguish, embarrassment, and humiliation, which was accompanied by the contemporaneous physical impact and injuries that he sustained from the attack, as outlined in paragraph 76 of this Complaint.

COUNT III
Negligent Infliction of Emotional Distress
(Michael Kaminsky Against Defendant)

98. Plaintiff Michael Kaminsky restates and realleges by reference the foregoing paragraphs as though fully set forth herein.

99. At all relevant times, Defendant owned, controlled, maintained and/or were responsible for the supervision, control, security, safeguarding, and/or oversight of the Premises.

100. Defendant owed a duty to all DePaul students and visitors, including Michael, to exercise reasonable and ordinary care to keep and maintain the Premises in a condition reasonably safe for the public's use. In particular, Defendant had a duty to take such precautions as were reasonably necessary to protect all lawful business invitees, including Michael, from reasonably foreseeable criminal attacks.

101. Defendant knew, or in the exercise of reasonable care, should have known, that the Premises and the area immediately surrounding its Premises was dangerous, that there had been numerous antisemitic attacks, extremely incendiary and violent rhetoric towards Jewish and Israeli

DePaul students specifically, and that criminal acts and attacks were reasonably likely to be perpetrated on DePaul's campus given this history, unless Defendant took steps to provide proper security to such individuals.

102. Defendant knew, or in the exercise of reasonable care, should have known that Michael had been the specific target of violent antisemitic rhetoric, that direct threats of violence had been lodged against him while he was peacefully existing on the Premises on prior occasions, and that criminal acts and attacks against him were reasonably likely to be perpetrated on the Premises given this history unless Defendant took steps to provide proper security.

103. Defendant breached its duty of reasonable care for the safety and protection of Michael in all or more of the following ways:

- a. by failing to provide adequate security for all lawful visitors and students on the Premises, including Plaintiffs;
- b. by failing to have an adequate number of security personnel to protect the lawful visitors and students on the Premises, including Plaintiffs;
- c. by failing to have competent security personnel to protect visitors and students on the Premises, including Plaintiffs;
- d. by failing to properly train security personnel to protect lawful visitors and students on the Premises, including Plaintiffs;
- e. by failing to provide security personnel with the tools and resources necessary to act in emergencies impacting lawful visitors and students on the Premises, including the Plaintiffs.
- f. by failing to have a sufficient number of security personnel in visible areas to deter crime and thereby protecting lawful visitors and students on the Premises, including Plaintiffs;
- g. by failing to provide reasonable and adequate instruction and/or supervision to employees, agents, representatives, servants and/or security personnel in connection with the safety of campus events;
- h. by failing to take additional security measures after being put on notice by prior instances and criminal activity that security measures were inadequate;

- i. by failing to reasonably and effectively utilize and monitor existing security devices in place, including surveillance cameras;
- j. by failing to warn, protect, guard, and secure the safety of Plaintiffs or other similarly situated students, when the Defendant knew or should have known of the existence of antisemitism and the danger to those individuals on the Premises;
- k. by failing to implement adequate security policies, security measures, and security proceedings necessary to protect Plaintiffs and other individuals on the Premises;
- l. by failing to implement adequate security policies, security measures, and security proceedings necessary to protect Plaintiffs and other individuals on the Premises;
- m. by failing to police, patrol, guard, deter, and otherwise provide adequate protection for individuals on the Premises, when Defendant knew or should have known of the foreseeable criminal acts;
- n. by cancelling and/or failing to renew the private security contract despite the violence occurring on campus in the days prior to the contract's expiration;
- o. by failing to have adequate control measures in place to ensure the safety of Jewish and Israeli students given the prolific calls for violence against the same;
- p. by failing to develop a safety and security plan for Jewish and Israeli students given the prolific calls for violence against the same;
- q. by failing to ensure adequate security presence on the Premises to deter criminal conduct;
- r. by failing to provide a safe place for its students and visitors;
- s. by failing to take any steps to increase security, despite knowledge of prior antisemitism on the campus and prolific calls for violence against Jewish and Israeli students;
- t. by failing to take any meaningful steps to contain or diminish the proliferation of violent antisemitic rhetoric permeating its campus, including by failing to enforce its own policies and rules against students participating in illegal protest activities on campus and in the surrounding areas;
- u. by failing to oversee and/or supervise existing security measures to ensure that such measures were being properly performed;
- v. by failing to employ reasonable and readily-available access control methods;

- w. by failing to employ reasonable and readily-available natural surveillance methods;
- x. by failing to secure the perimeter of the Premises to prevent individuals without a lawful purpose from coming onto the Premises;
- y. by failing to remove individuals from the Premises without a lawful purpose when Defendant knew or should have known of their existence;
- z. by failing to intervene when two DePaul students were being brazenly beaten in broad daylight on the Premises;
- aa. by failing to provide security personnel with the resources and tools necessary to intervene when two DePaul students were being brazenly beaten in broad daylight on the Premises;
- bb. by failing to provide necessary medical treatment to Plaintiffs; and
- cc. were otherwise careless, reckless and/or negligent

104. As a natural, probable, and proximate result of Defendant's conduct, Michael sustained pain and suffering, post-traumatic stress, severe psychological and emotional distress, mental anguish, embarrassment, and humiliation, which was accompanied by the contemporaneous physical impact and injuries that he sustained from the attack, as outlined in paragraph 77 of this Complaint.

COUNT IV
Intentional Infliction of Emotional Distress
(Max Long Against Defendant)

105. Plaintiff Max Long restates and realleges by reference the foregoing paragraph as though fully set forth herein.

106. Defendant knew that Max was a specific target for antisemitic rhetoric and threats of violence.

107. Defendant also knew that its campus security measures were inadequate to prevent its students, including Max, from facing threats of violence and physical harassment and assaults before November 6, 2024.

108. Despite this knowledge, Defendant did not take any action whatsoever to enhance its security further or protect Max from his imminently foreseeable attack.

109. Additionally, while Max was being viciously beaten, a DePaul Public Safety Officer stood idly by, just feet away. Despite viewing the fight and having every opportunity to intervene, the Public Safety Officer did nothing until the perpetrators had run off. A second Public Safety Officer caught one of the offenders, but let him go only a few seconds later.

110. Defendant's failures, as described in the preceding paragraphs, constitute extreme and outrageous conduct. Defendant knew the danger that Max was in, but did nothing to prevent it from happening and did not intervene when it was happening. Max was a student at DePaul. He reasonably expected that his university would implement reasonable measures to ensure his safety. But Defendant disregarded him entirely. Such conduct is so extreme in degree as to go beyond all possible bounds of decency; it is utterly intolerable in a civilized community.

111. Defendant acted with intent or recklessness, knowing that Max was likely to suffer emotional distress, and with deliberate disregard of same.

112. Defendant's conduct caused severe emotional distress and suffering for Max at levels no person should have to endure.

113. As natural, probable, and proximate result of Defendant's conduct, Max sustained pain and suffering, post-traumatic stress, severe psychological and emotional distress, mental anguish, embarrassment, and humiliation, loss of a normal life, medical expenses (past and future) in addition to the physical injuries that he sustained from the attack. Defendant's conduct caused Max's severe emotional distress.

COUNT V
Intentional Infliction of Emotional Distress
(Michael Kaminsky Against Defendant)

114. Plaintiff Michael Kaminsky restates and realleges by reference the foregoing paragraphs as though fully set forth herein.

115. Defendant knew that Michael was a specific target for antisemitic rhetoric and threats of violence.

116. Defendant also knew that its campus security measures were inadequate to prevent its students, including Michael, from facing threats of violence and physical harassment and assaults before November 6.

117. Despite this knowledge, Defendant did not take any action whatsoever to further enhance its security or protect Michael from his imminently foreseeable attack.

118. Additionally, while Michael was being viciously beaten, a DePaul Public Safety Officer stood idly by, just feet away. Despite viewing the fight and having every opportunity to intervene, the Public Safety Officer did nothing until the perpetrators had run off. A second Public Safety Officer caught one of the offenders, but let him go only a few seconds later.

119. Defendant's failures, as described in the preceding paragraphs, constitute extreme and outrageous conduct. Defendant knew the danger that Michael was in, but did nothing to prevent it from happening and did not intervene when it was happening. Michael was a student at DePaul. He reasonably expected that his university would implement reasonable measures to ensure his safety. But Defendant disregarded him entirely. Such conduct is so extreme in degree as to go beyond all possible bounds of decency; it is utterly intolerable in a civilized community.

120. Defendant acted with intent or recklessness, knowing that Michael was likely to suffer emotional distress, and with deliberate disregard of same.

121. Defendant's conduct caused severe emotional distress and suffering for Michael at levels no reasonable person should have to endure.

122. As a natural, probable, and proximate result of Defendant's conduct, Michael sustained pain and suffering, post-traumatic stress, serious psychological and emotional distress, mental anguish, embarrassment, and humiliation, loss of a normal life and medical expenses (past and future) in addition to the physical injuries that he sustained from the attack. Defendant's conduct caused Michael's severe emotional distress.

WHEREFORE, Plaintiffs demand judgment against Defendant, DePaul University, in a sum in excess of FIFTY THOUSAND (\$50,000.00) DOLLARS, and, as follows:

- a. compensatory damages;
- b. emotional distress damages;
- c. pre- and post-judgment interest;
- d. litigation costs; and
- e. all other relief the court deems appropriate.

PLAINTIFFS DEMAND A TRIAL BY JURY OF TWELVE

Respectfully submitted,

/s/ Lisa B. Weinstein

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EXHIBIT A

President Robert L. Manuel

[President Robert L. Manuel](#) > [Notes from Rob](#) > [2023-24](#) > [Encampment removal](#)

Encampment removal

By Rob Manuel / May 16, 2024 / [Twitter](#) / [Facebook](#)

Dear Faculty, Staff and Students,

I write to you early on this Thursday morning to inform you that despite our good faith efforts to come to a shared resolution with the DePaul Divestment Coalition, we were unsuccessful.

I and the members of our engagement team have worked over the past 17 days to create a path forward that was guided by the desire to see DePaul come to a resolution with the coalition. Through those conversations, I became convinced representatives of the coalition could not speak for all members of the group supporting the encampment. The student leaders made this clear when they rejected a portion of the amnesty clause of the agreement, saying they could not represent the actions of all the student groups supporting the encampment.

Since the encampment began on April 30, the situation has steadily escalated with physical altercations, credible threats of violence from people not associated with our community, an inability for the other members of our community to take part in the core academic experiences on our campus, and an [ever-growing series of threats](#) to the people involved in the encampment and our community members. From the beginning of the encampment, I have said that we would protect free speech and the ability to dissent until it either prevented us from carrying out the operations of our university or threatened the safety of the members of our community. I am deeply saddened to say the encampment has crossed that line.

Our Office of Public Safety and Chicago Police are now disassembling the encampment. Every person currently in the encampment will be given the opportunity to leave peacefully and without being arrested. I urge all there to leave peacefully and return home.

Since the encampment began, DePaul has taken great care to provide the greatest leeway possible for free expression. However, the expression of some has now led to the disruption of university operations, interference with student learning, and safety threats to individuals and the public. For example, we are aware of a death threat against a student and reports of individuals threatening to slit the throats of people they perceive to be Jewish or in support of the Israeli State. We are also aware that there was a bounty put out to identify certain members of the encampment. It is clear the encampment is now attracting [outside threats to both those inside of it, and those around it](#).

These threats have been accompanied by signs implicitly and explicitly advocating violence. We have had instances of fireworks being lobbed into the encampment from Fullerton Avenue. We received credible threats against the encampment from phone numbers that when traced appear to be connected to anarchists and hate groups. Individuals from the encampment have started to place locks on the buildings adjacent to the quad and barricaded key entrance and exit points. Occupants in the encampment have vandalized buildings and other structures in the quad with graffiti and made etchings on windows. The cost to repair the physical damage to the quad appears to be nearly \$180,000.

We took steps to address these concerns as we became aware of them and made every effort to assist our faculty, staff, and students who received threats or who told us the encampment activities prevented them from working, studying or

otherwise participating in their normal university pursuits. We can no longer maintain this balance. We had no choice but to act, before we lost the ability to provide for the safety of the Jewish members of our community, to protect those in the encampment, to preserve the rights of all other students, and to maintain university operations.

As stated in previous messages, I do believe students with the Divestment Coalition initiated the encampment with sincere intentions to peacefully protest. While their teach-ins, library, and prayer services on the quad have in themselves been peaceful, these good intentions have been unable to outweigh the draw that the encampment has to others with nefarious and harmful intent.

We must connect what is being portrayed as a peaceful protest with a dangerous reality that developed over time. In an effort for you to see this reality, you may view this website, which includes numerous examples of complaints of discrimination, harassment, and violence that the university received over the past 17 days. These examples are representative of the more than 1,000 registered complaints the university received since the encampment began. Certain content on the website contains explicit or violent material that may be harmful or traumatizing. Viewer discretion is advised.

Effective immediately, the quad and all other green spaces on the Lincoln Park Campus will be closed to everyone. These spaces will remain closed until further notice so that we can begin property repairs and return to normal operations. Anyone who tries to breach the fence around the quad or any of the green spaces on the Lincoln Park Campus will be trespassed, arrested, and suspended. DePaul will continue to investigate every reported complaint of harassment or discrimination that we receive resulting from the encampment or subsequent events.

Our patron, St. Vincent de Paul, was known for creating opportunities to bring people to the table. Since April 30, I have worked diligently to uphold our Vincentian ideals. Following St. Vincent's model, I brought the student leaders of the DePaul Divestment Coalition to the table multiple times. I also met with many in our community from the Jewish faith, and those leaders around Chicago who were involved and concerned about these activities.

The university responses to the DePaul Divestment Coalition's [demands](#) can be [found here](#), and the additional opportunities that the administration offered in order to continue to have the student voices heard can be [found here](#). I was deeply saddened when, in our final round of talks, the student leaders expressed that they would not be able to speak for all the groups that represented the coalition and did not offer support or agreement for the items in the proposals that we made.

We remain committed to ensuring that our students have the opportunity to protest and express their dissent with both university and world positions. We remain committed to ensuring that their voices are heard. While we hold tight to the belief that free speech must continue, we are equally clear that the encampment cannot.

I will share another update with the university community soon.

Sincerely,

Robert L. Manuel
President

[President Robert L. Manuel](#)



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FILED DATE: 4/2/2025 2:02 PM 2025L004536

EXHIBIT B



Threats to Safety and Disruption of Campus Operations

The following is a selection of the many social media posts, images, data and quotes that exemplify the escalation of the impact of the encampment on DePaul’s Lincoln Park quad from a peaceful protest to an unsafe and intimidating environment for all DePaul and local community members. Data and images demonstrate the inability of the university to carry on normal, safe campus operations and also demonstrate hateful, discriminatory and intimidating signs and actions.

Some images on this page may be harmful or traumatizing and contain explicit or violent material. Viewer discretion is advised.

DePaul University and local community complaints and physical plant damages

625+ registered complaints from neighbors and community members

425+ registered complaints from students, faculty and staff, and parents

1 Death Threat	4 Credible Threats of Violence
12 Incidents of Criminal Property Damage	34 Reports of Antisemitism
6 Disorderly Conduct Charges	25 Academic Disruptions
13 Harassment Allegations	77 Reports of individual safety concerns
16 Instances of Intimidation	4 Allegations of Battery
48 Noise Complaints	184 Other Generalized Concerns

Complaints range from noise ordinance violations, to aggressive, intimidating, and violent speech, and the inability to peacefully enjoy the community around them. Registered concerns from parents, students, faculty, and staff captured from the Dean of Students, Division of Student Affairs, Office of the President, and the Office of Public Safety. All reports have either been reported to the Chicago Police Department or are under investigation by our Dean of Students.

Data as of Wednesday, May 15, 2024. Claims continue to be reported.

Safety violations or physical plant damage

- Spray paint on buildings and doors
- Dumpsters used to block building entrances and exits
- Removal of safety grates
- Chained and locked library doors
- Etching on glass/windows
- Estimated \$180,000 in physical plant damages to the quad and surrounding areas

Other community or university life disruptions

- 45 university events canceled
- Oscar Mayer Elementary School canceled recess and other outdoor activities

Videos

5-3-24 12:30 a.m. Drums and Microphones



Powered by Panopto



Noise ordinance violation

5-5-24 Flag Skirmish



Powered by Panopto



Simple battery

Go Home Racists



Powered by Panopto



Jewish Alliance bake sale



Powered by Panopto





**DEPAUL - PROTESTOR
THROWS UP A 10 & 7.
MOTIONS TO THROAT**





<https://www.instagram.com/p/C6m8zuftvDe/>



Original audio

...

Jewish community members & allies gathered today @depaulu music school lawn to celebrate Mother's Day & rally to support Jewish students experiencing antisemitism on campus, a group of pro-Palestinian students wearing masks and face coverings walked over from the encampment more than 2 blocks away, & started chanting and praising Hamas & Oct. 7th.

#chicago #depauluniversity
#supportjewishstudents
#endjewhatred #stopantisemitism
#amysisraelchai #עמישראלחי
#jewishpride #jewishpridealways

597 likes

11 hours ago

Log in to like or comment.

<https://www.instagram.com/reel/C64-m8gNpol/?igsh=MW9taHh5bTJpMDcyeg%3D%3D>



Instagram post interface showing comments and engagement metrics.

Comments:

- [Redacted]
- [Redacted]

Engagement:

- 20 likes
- 17 comments

Hashtags:

- #GoToPoland
- #Poland
- #PolandVibes
- #PolandLove
- #PolandLife
- #PolandTravel
- #PolandTrip

<https://www.instagram.com/reel/C6ct8vANcmL/?igsh=MTMydGg5ZXQ1MHF3Mg%3D%3D>



[REDACTED]

DePaul University students chant chilling pro-terrorism message.

"We are the intifada."

[REDACTED]

@sjpdepaul 🍌🍌

<https://twitter.com/OliLondonTV/status/1786744547206107575>

Photos

FILED DATE: 4/2/2025 2:02 PM 2025L004536



Antisemitic stickers placed on university property







Zionists
aren't
welcomed
here!











Protestor holding an intifada sign.







Protestors attached locks to John T. Richardson Library doors next to the quad.

Protesters attached locks to John T. Richardson Library doors next to the quad

1:51



99%



Very peaceful people
holding up a flag of Abu

Obaida (Hamas spokesman).
Try to gaslight us again
that calling them "pro-
Hamas" is not true.

Send message



**CHICAGO POLICE THREATENS
STUDENTS FOR USING
AMPLIFIED SOUND**

**WILL THIS STOP US? NO.
ARE WE LEAVING? NO.**

**WE WILL REMAIN HERE AND YELL
OUR DEMANDS LOUD AND
CLEAR UNTIL THEY ARE MET.**



18:41



FREE PALESTINE
IN OUR LIFE TIME
NO MATTER WHAT IT TAKES

JEWISH SAFETY
CANNOT BE
ACHIEVED
UNTIL PALESTINE
IS FREED

this poster was spotted
on the DePaul campus
today? When will Jews
feel safe on their
college campuses?

Send message





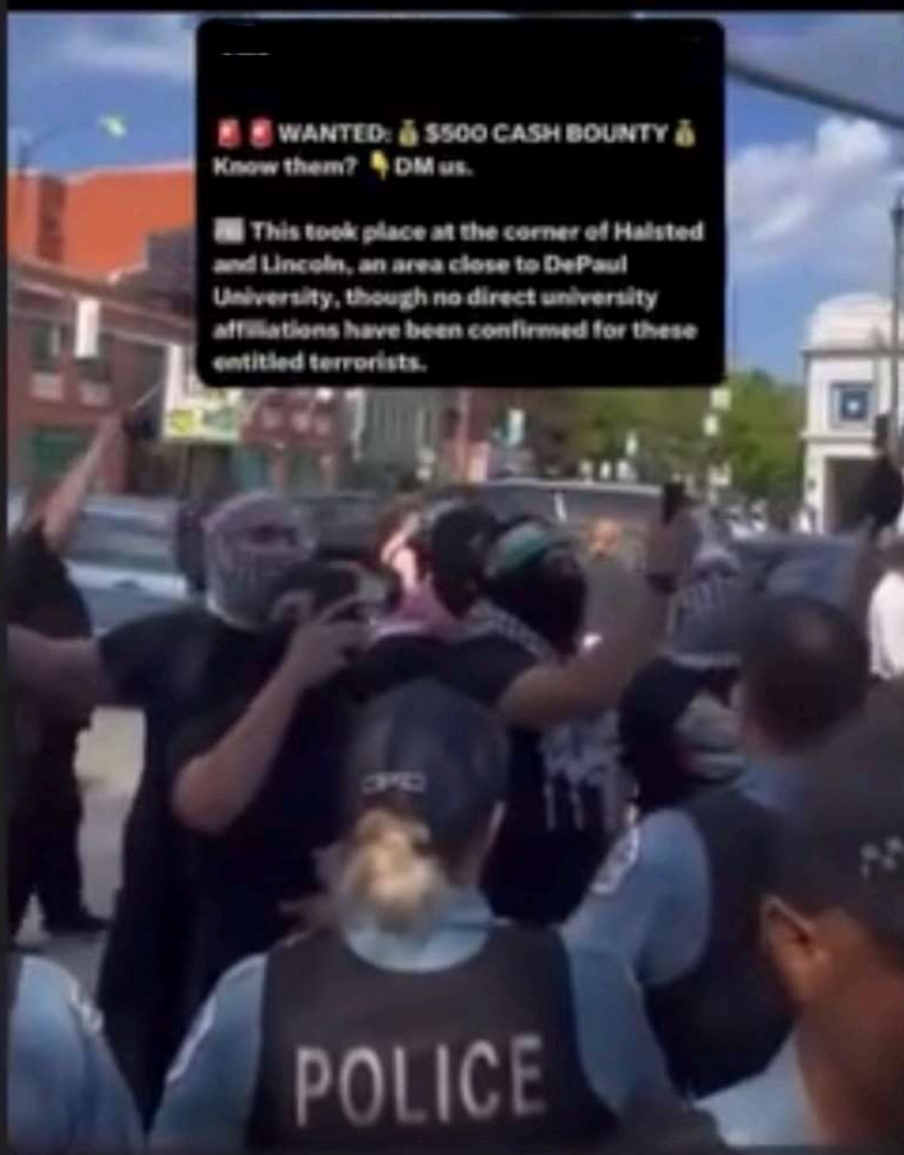
1h



Watch full reel >



0:25



... e

\$500 cash bounty

From video shown above. \$500 bounty for identification of protestors.

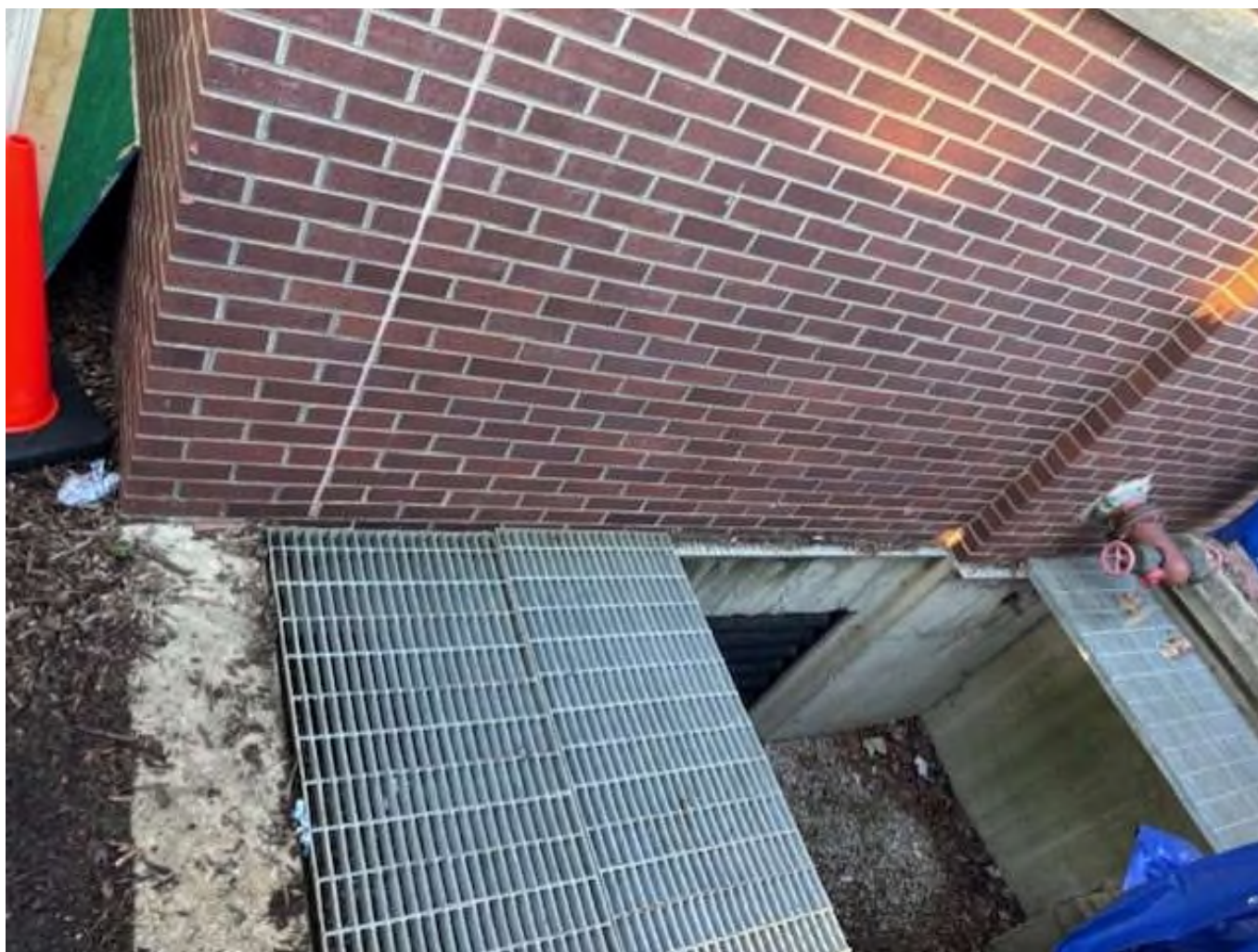








Sign with writing that reads "Globalize the Intifada."



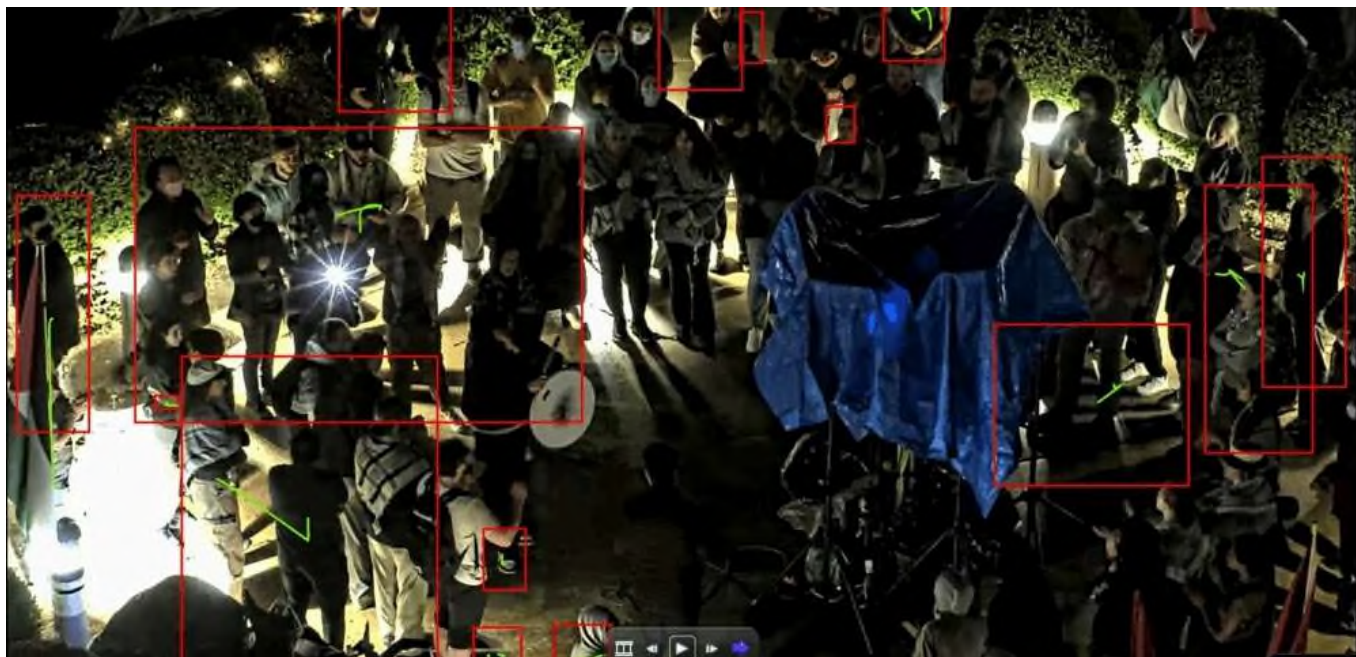
Grates removed from facility operations access wells



Barricade reinforced by a heavy, steel bar and wooden pallet



Barricade at one of the entrances to the Lincoln Park quad



Noise ordinance violation



Noise ordinance violation



Pellet gun

D.T.E
ISRAHELL
FREE ♡
PALESTINE!!!
by SD





LONG Live
the

2025
HUELGA
GENERAL
STRIKE

INTIFADA

ME D





A hidden and covered bowling ball



Misappropriated university property



Boards on ground with long nails/screws sticking out as traps along the Fullerton fence.



Boards on ground with long nails/screws sticking out as traps along the Fullerton fence.

A portion of complaints from DePaul students, parents, faculty, staff, and local

community members

Student reported to Public Safety that she was followed through the Quad where she overheard "I want to kill her" and "I want to rape her;" handed Quarans (including one that smelled like vinegar); threatened with a fight; told "You're Jewish scum, you do not deserve this;" and then she began to cry.

"After we walked from the peaceful pro-israel event back to our home, we had to walk past the front gates of DePaul again. Things had become more tense and more violent. My son and I watched a group of five masked men carrying Palestinian flags push a Jewish man to the ground and then steal his Israeli flag. I was called a baby killer, a murderer, a genocide supporter. My friends had paint thrown on them, were pushed and verbally assaulted."

"My son is a freshman at DePaul and lives in the dorms. I'm reaching out to you because my son is no longer feeling safe at DePaul as a Jewish student. He participated in a pro-Israel gathering on Sunday. He shared how peaceful and welcoming the gathering was until he and a fellow student were walking back to his dorm. He told me that he and his female friend were encircled by an another group of masked students chanting, yelling and pushing while not allowing them to escape. My son resorted to physically pushing his way out of the circle and ran away from the verbal threats and antisemitic rhetoric. No police were present on the scene. This was clearly traumatic for him and his friend and vicariously traumatic for me, his mother as it would be to any concerned parent of any of your student body."

"Imagine being 18 years old and hearing people screaming and chanting for your death on campus and having them have more freedom of speech than you do because they have no fear. It's deplorable. I believe in speech I believe in the right to protest, but I do believe on it encroach on other people civil rights."

"This protest goes far beyond what the law protects. There's hate speech at the core of pro palestinian messaging on your campus. They're calling for the elimination of the state of Israel. I was personally there when one protester screamed expletives at me while a small group of pro israel people stood peacefully/quietly."

"I am an Israeli and Jewish student who lives in University Hall. I have not slept for the past three nights because of the calls outside of my window for an Intifada...I have nowhere safe to go as an out-of-state student. I cannot go home, though all I want is to feel safe. "

"If it was peaceful, Oscar Mayer elementary wouldn't feel the need to cancel outdoor recess. The kids want to know why they can't go outside now for recess..."

"After hours of discussion at our home last night our son is attending class today, but is very concerned about his physical safety. As a parent, we are scared for his safety both mentally and physically and while the encampment is the main focus of events on campus, there are also talks about protesters storming into classrooms and disrupting studies. Should this occur, especially with the outside influencers involved, your student's physical safety is at risk. In addition, I can't explain to you how painful the question from our son was on if this occurs should he admit he is Jewish or not."

"I find it incredibly concerning that photos are appearing of young men holding flags depicting the image of Abu Obaida, a Hamas spokesman."

"Please do something with what is going on. I live in University Hall and this has affected my well-being. Shouting in the evening past 10 pm is affecting my well-being as a student at YOUR university. The campers have been shouting very concerning things such as "From the river to the sea, Palestine will be free," "We're the Intifada," and "KKK and CPD are the same thing." These statements are upsetting to me and make me feel unsafe at my college. The university alerts students not to leave their dorms, it shows that the university recognizes that the campus is not safe. The university needs to tell the protesters they need to clear the quad by a certain time. If not have CPD clear it out. "

"Every day is a nightmare. I walk through the neighborhood and it's littered with antisemitic graffiti and flyers calling for the genocide of the Israeli people and images of kidnapped humans including a boy the same age as my 4 year old son are torn down."

"I drove by your university and walked around yesterday as my 15-year old daughter said she was scared to be near the school. She works and goes to school in the area... I'm fearful as a Jewish resident."

"My daughter lives in Uhall - I have stayed quiet for a week in the hopes that you as a university would resolve this situation in safe and reasonable way. I find the ongoing disruption to the campus and the students in the dorms, not able to study or sleep because of the chanting etc., well into the early morning hours completely

unacceptable! Not only does my daughter fear for her safety when she is on campus - now she can't sleep / study in her dorm (for a week and counting). She is an out of state student that does not have anywhere else to go."

"My son is scared to walk down Fullerton in the middle of the day because he is Jewish. How can you let this continue?"

"My daughter is a resident at University Hall. She and her roommate are emotionally exhausted. The noise is keeping them from studying in their dorm room and sleeping soundly at night. Their stress level is unhealthy and we are worried.."

"I am horrified by the banner that is showcasing in our Quad this morning I understand that everyone has the right to protest but having a banner with a man pointing a rifle to a kid is horrific!! ...[I]t is over all insinuating violence."

"While I was walking through the quad today on my way to class, I noticed a banner that I'm assuming was set up by the encampment. This banner is a soldier holding a gun at a civilian, that looks to be a child. This is deeply disturbing."

"I am unsure whether the university understands how hurtful and honestly scary it is to see my peers, friends, and professors chanting whether consciously or not, for the harm of Israel and Zionists, or Jews for that matter."

"I've already been advised by police not to visit the quad for my own safety. I was told by people of the encampment I'm not welcomed at school, and harassed me until I left. How long will I be barred from MY OWN SCHOOL that MY tuition goes to support!?"

"As we walked home this past Sunday afternoon, a group of seven men completely covered up from head to toe, walked up and down Belden intimidating people. How are you allowing this on your campus grounds in 2024?"

"If the encampment on the quad stays peaceful, I do not mind however, yesterday they were chanting "We are the intifada." I find this extremely concerning for me and all other Jewish students who attend this university."

"Since October 7th, 2023, we have seen a dangerous increase in antisemitism and hatred towards others on our campus and within our Jewish Community...we are now facing violence for existing, shut out of public spaces, and fear of speaking up against hatred and rampant antisemitism."

"Give me my f***king money back bro stop canceling classes I spent my life savings on this school"

"I previously sent an email about how I feel unsafe as a Jewish student at DePaul, and how the noise every night outside of Uhall is unbearable."

"While I am not Jewish, nor Palestinian, but I feel uncomfortable with the fact that a professor would so openly go out of their way to create such an assignment. I hope that you take action to make sure this doesn't happen in classrooms. I am putting myself through college and am finally graduating. I transferred from another university to DePaul knowing the good education I should be getting. I do not want this to ruin my view or my education. Thank you."

"No student should feel the need to be 'escorted' to walk across our Lincoln Park campus during broad daylight. This is the reality we are facing as Jewish students on campus at DePaul."

"I have to take a different route to school with my children so they don't have to be exposed to the hate speech and antisemitism."

"I am a neighbor of DePaul university and have always been proud to share the neighborhood with your wonderful city campus and students. I was dismayed to wake up today and learn that you now have an antisemitic, anti-American and anti-Jewish mob encamped on your campus."

"There's hate speech at the core of pro-Palestinian messaging on your campus. They're calling for the elimination of the state of Israel. I was personally there when one protester screamed expletives at me while a small group of pro-Israel people stood peacefully/quietly."

"Small children should not be exposed to protests or agitation. Parents sending kids to summer camp should not have to worry that their kids will accidentally get caught up in something dangerous!"

"Sadly, this antisemitism was on display in our own neighborhood, on the campus where we walk every day with our 5- and 8-year old. Our 8-year old notices."

From same community member:

"It is 12:44 [a.m.] and the protests and noise are still going on."

"There is once again amplified noise from the protests on the quad. It is past 9:30. Do something."

"I live at Clinton and Fullerton and have considered myself a friend and neighbor of DePaul. It is appalling to observe the professional agitators and hate terrorists creating an encampment of ugliness. Anyone referring to the participants as "students and alumni" is being deceitful. Some of the suppliers - picture enclosed from last night - smiled and jokingly made references to another victory in campuses against Jews.... Please also stop the loudspeakers after 10 pm - as a good neighbor.."

"A new sign seen today at DePaul entrance: "Long Live the intifada!" The calling for the killing of Jews! A sign seen at DePaul Encampment: "Jewish safety cannot be achieved until Palestine is Freed." Although it was removed this speaks to the hate that is embroiled in your campus. There are reports that your Jewish students and members of the surrounding community have been harassed with antisemitic hate speech. This will not go away if you allow these encampments to continue on campus. "

"This past weekend I was told by someone from the encampment to "go home". This is the first time in my 59 years I have experienced blatant anti semitism. It was horrifying."

"I am really disappointed and saddened by the way this situation is being handled. As a Jewish person, we can no longer walk through the quad as it's full of offensive language. The arched entrance is boarded up."

"The encampment has now renamed the library the Refaat Alareer memorial library. This is a man who replied to a tweet about Hamas murdering a baby in an oven with "with or without baking soda" and who declared that most Jews are evil. WHY are you allowing these people to terrorize the entire Jewish population of Lincoln Park and to celebrate a man who joked about Jewish babies in ovens. Why do I have to walk by this every day with my Jewish babies? Why am I forced to go to about my day while masked men who might or might not even be students give me the finger and shout go back to Poland? I am not sleeping at night because I am so scared - tell me, are you sleeping knowing what you've allowed to happen? Take the sign down and then take the encampment down. I want to be safe in my neighborhood again. "



Refaat in Gaza  
@itranslate123

...

With or without baking powder?



Dovid Efune  @Efune · 13h · 

A baby was found in an oven, baked to death by Hamas terrorists, leading Israeli first responder @EliBeerUH recounted to an @RJC gathering last night.

His group was among the first to respond to and witness the Oct 7 atrocities.

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Leadership Notes

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