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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

WESTERN DIVISION

RONEN HELMANN,

Plaintiff,

v.

CODEPINK WOMEN FOR PEACE, PALESTINIAN YOUTH MOVEMENT, and JOHN AND JANE DOES 1-20,

Defendants.

Case No.: _____

COMPLAINT

DEMAND FOR JURY TRIAL

INTRODUCTION

1. Plaintiff RONEN HELMANN is a religious Jew who resides in the Pico-Robertson neighborhood of Los Angeles, CA. He is an active member of the Jewish community. On June 23, 2024, Code Pink and Palestinian Youth Movement organized their Hamas supporters to target an Israel event at the Adas Torah Synagogue on Pico Boulevard in the heart of the Jewish community. They formed a mob that blocked the entrance, preventing Plaintiff and others from accessing the synagogue. The attack was provoked, aided, and funded by Code Pink and Palestinian Youth Movement, two anti-Israel organizations, and joined by JOHN AND JANE DOE 1-20 (together, "Defendants") in an unlawful effort to use force, intimidation, and threats to prevent Jewish people from accessing the synagogue and exercising their religion.

2. Defendants' actions violated the Freedom of Access to Clinic Entrances Act and the Ku Klux Klan Act.

3. Defendants' conspiratorial acts directly resulted in violence and threats against Jews who sought to access a synagogue.

PARTIES

4. Plaintiff Ronen Helmann is a resident of Los Angeles, California.

5. Defendant CODEPINK WOMEN FOR PEACE ("Code Pink") is a registered 501(c)(3) that supports the terrorist organization Hamas and opposes the state of Israel. Code Pink used social media and/or other means to incite followers to converge in front of a synagogue in Los Angeles on June 23, 2024, and to use fear and intimidation

tactics to prevent Jewish people from entering the synagogue. Code Pink's headquarters are located in Marina Del Rey, California.

6. Defendant Palestinian Youth Movement ("PYM") is a registered 501(c)(3) that supports Hamas and opposes the state of Israel and used social media and/or other means to incite followers to converge in front of a synagogue in Los Angeles on June 23, 2024, and to use fear and intimidation tactics to prevent Jewish people from entering the synagogue. PYM is a fiscally sponsored project of the Westchester People's Action Coalition (WESPAC), based out of Westchester, New York.

7. Defendants John and Jane Does 1-20 are unknown individuals who assaulted and threatened Plaintiff or joined in the conspiracies alleged in this Complaint through their planning, support, encouragement, and/or funding.

JURISDICTION AND VENUE

8. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1343 because Plaintiff's federal claims arise under the laws of the United States.

9. Venue is proper in this Court pursuant to 28 U.S.C.§ 1391(b)(2) because substantial conduct giving rise to Plaintiff's claims occurred in the Central District of California.

10. This Court has personal jurisdiction over all Defendants pursuant to Fed. R. Civ. P. 4(k)(1)(A) because they and their agents caused injuries to Plaintiff by acts and omissions inside, or having an effect in this district and in the State of California.

FACTS

11. Code Pink and Palestinian Youth Movement rallied its Hamas supporters to attack people going to an Israel event at Adas Torah synagogue in Los Angeles.

12. On June 20, 2024, Defendant Code Pink targeted the synagogue in the Pico-Robertson neighborhood of Los Angeles on social media by calling their program "A Mega Zionist Real Estate Event Is in LA this week."

13. Code Pink incited its followers to "Bring flags, posters and megaphones. No Peace on Stolen Land." Defendant Palestinian Youth Movement also used social media to call on its followers to target the event as well.[1]

14. On Sunday, June 23, 2024, about two hundred anti-Israel protestors gathered to block access to the synagogue, resulting in several violent attacks on synagogue supporters and one arrest of a protestor.[2]

15. Congregation Adas Torah was hosting an Israel related event that day. The event included religious education, information, and opportunities for members of the Los Angeles Jewish community to make *Aliyah*, or to fulfil their Biblical obligation to live in the land of Israel.

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[1] *See* Starr, Michael. "LA Synagogue Riots Show US Not Taking Anti-Israel Threats Seriously." *The Jerusalem Post*, 25 June 2024, www.pressreader.com/israel/jerusalem-post/20240625/281732684668553 (last accessed July 3, 2024).

[2] *See* "L.A.'s Adas Torah Violently Attacked by Pro-Palestinian Protestors at Real Estate Event." *The Jewish Link*, 27 June 2024, jewishlink.news/l-a-s-adas-torah-violently-attacked-by-pro-palestinian-protestors-at-real-estate-event/ (last accessed on July 3, 2024).

16. Code Pink and PYM targeted these Jewish practices to incite its Hamas supporters to cause chaos, violence, and block the entrance to the synagogue, all because of their hatred of Zionism, the Jewish connection to the land of Israel.

17. On June 23, 2024, Plaintiff Ronen Helmann was walking in the Pico Robertson neighborhood where he resides and where Adas Torah is located. Helmann frequently congregates and prays at Adas Torah.

18. Helmann noticed JANE DOES 1-3, women who were wearing headscarves and masks covering their faces, walking from house to house.

19. Plaintiff saw JANE DOES 1-3 were checking the doors of the houses for Mezuzahs (typically seen on doorposts of Jewish homes). They appeared to be taking pictures of houses with Mezuzahs.

20. Plaintiff also noticed JANE DOES 1-3 were marking the cars that they suspected were associated with the houses with Mezuzahs. They were communicating on cell phones.

21. Plaintiff became frightened, so he began walking towards Adas Torah to congregate with other community members and pray for the safety of the synagogue.

22. As he got closer to the synagogue, Plaintiff saw a mob of anti-Israel protesters (JOHN DOES 1-10) standing in the way of the entrance to the synagogue.

23. Plaintiff saw JOHN DOES 1-10 had backpacks and pepper spray. They were wearing masks. He was afraid they may have other weapons.

24. As Plaintiff walked towards Adas Torah, JOHN DOES 1-10 approached Plaintiff with cameras and came right up to his face and took pictures of him.

25. JOHN DOES 1-10 came very close to Plaintiff's face and started yelling at him.

26. JOHN DOE 1 yelled at Plaintiff calling him a "nazi." JOHN DOE 2 yelled, "Hitler didn't finish the job." JOHN DOE 3 yelled, "baby murderer." JOHN DOE 4 yelled "colonizers." JOHN DOE 5 said, "to which God are you praying?" JOHN DOE 6 yelled, "leave the neighborhood, we are coming!" JOHN DOE 7 yelled *itbach el yehud* ("slaughter the Jews" in arabic). JOHN DOES 8-10 yelled other racial and ethnic slurs about Jews.

27. Police arrested JOHN DOE 11, who was carrying a spiked post.[3]

28. There were many reports that the demonstrators used mace and bear spray on the Adas Torah Congregants.

29. Naftoli Sherman, 25, suffered a broken nose and a black eye after being attacked by rioters that day.[4]

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[3] *See* "Person with spiked post arrested in clash outside Los Angeles synagogue." *NBC Los Angeles*, 24 June 2024, https://www.nbclosangeles.com/news/local/arrest-la-synagogue-protest-israel-palestine/3443019/ (last accessed July 7, 2024).

[4] *See* Bandler, Aaron. "Jewish Community Members Attacked by Anti-Israel Protesters in Front of Adas Torah Speak Out." *Jewish Journal*, 27 June 2024, jewishjournal.com/news/372674/jewish-community-members-attacked-by-anti-israel-protesters-in-front-of-adas-torah-speak-out/ (last accessed July 7, 2024).

30. Pico-Robertson resident Talia Regev, 42, tried to attend the synagogue event, but was bear-sprayed.[5]

31. Rabbi Dovid Revah of Adas Torah told KABC that people were "scared to come in" to the synagogue, and that these types of protests are "a violation of holy space."

32. "[Sunday's] violence was abhorrent, and blocking access to a place of worship is unacceptable," said Los Angeles Mayor Karen Bass. "I want to be clear that Los Angeles will not be a harbor for antisemitism and violence. Those responsible for either will be found and held accountable."

33. President Biden wrote on X that he was "appalled" by the scene outside Adas Torah. "Intimidating Jewish congregants is dangerous, unconscionable, antisemitic and un-American."

34. Because of the intimidating and threating presence and conduct of the Defendants, Plaintiff decided it was not safe to enter the synagogue to pray, so Plaintiff instead returned to his home.

35. After the incident, Defendants took responsibility for the attack and attempted to defend their conduct on social media.

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[5] *Id.*

36. Code Pink responded to President Biden's comment that the attack on Adas Torah was antisemitic. Code Pink justified the attack on the synagogue on the basis that "no religious services were scheduled."[6]

37. Plaintiff fears that Defendants could target his neighborhood and synagogue with similar tactics in the near future, or worse.

CLAIMS FOR RELIEF

COUNT I
FACE Act (18 U.S.C. § 248(a)(2))
Freedom of Access to Clinic Entrances
(Against All Defendants)

38. Plaintiff incorporates herein by reference all the allegations contained in the preceding paragraphs.

39. The Freedom of Access to Clinic Entrances Act of 1994 ("FACE Act") prohibits a person from intentionally injuring, intimidating, or interfering with another who is exercising her religion "at a place of religious worship." 18 U.S.C. § 248(a)(2).

40. Defendants willfully, knowingly, and intentionally combined, conspired, and agreed with one another, and with other persons and entities known and unknown, to use force, the threat of force, and physical obstruction to injure, oppress, threaten, and intimidate Jewish people (including Plaintiff) seeking to exercise and enjoy their right of religious freedom at a place of religious worship secured to them by the First Amendment.

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[6] *See* "Biden Lies." *CODEPINK,* https://www.codepink.org/bidenlies (last accessed July 7, 2024).

41. As described herein, Plaintiff desired and intended to pray at his synagogue, Adas Torah, on June 23, 2024, and was blocked from entering the synagogue by Defendants.

COUNT II
Ku Klux Klan Act (42 U.S.C. § 1985(3))
Conspiracy to Interfere with Civil Rights
(Against All Defendants)

42. Plaintiff incorporates herein by reference all the allegations contained in the preceding paragraphs.

43. United States Code Title 42 Section 1985(3) states that if two or more persons in any state "conspire to go in disguise on the highway or on the premises of another, for the purpose of depriving, either directly or indirectly, any person or class of persons of the equal protection of the laws, or of equal privileges and immunities under the laws … if one or more persons engaged therein do, or cause to be done, any act in furtherance of the objects of such conspiracy, whereby another is injured in his person or property, or deprived of having and exercising any right or privilege of a citizen of the United States, the party so injured or deprived may have an action for the recovery of damages occasioned by such injury or deprivation, against any one or more of the conspirators."

44. The Defendants conspired together to disguise in masks for the purpose of depriving Jewish people, including Plaintiff, of the equal protection of the laws and equal privileges and immunities under the laws, and Plaintiff was injured due to the actions of Defendants.

COUNT III
Ku Klux Klan Act (42 § U.S.C. 1986)
Failure to Prevent Conspiracy to Interfere with Civil Rights
(Against All Defendants)

45. Plaintiff incorporates herein by reference the allegations contained in all preceding paragraphs.

46. Section 6 of the Ku Klux Klan Act (42 U.S.C. § 1986) makes liable any person who knows that the wrongs conspired to be done and mentioned in section 1985 are about to be committed, has the power to preventor aid in preventing those wrongs, and yet neglects or refuses to help prevent them.

47. Each Defendant had knowledge that the wrongs conspired to be done, as set out in Count II, were about to be committed and neglected or refused to prevent or aid in preventing those wrongs.

48. Each Defendant was in a position and had the power to prevent, or aid in the preventing, the wrongs conspired to be done as asserted in Count II.

PRAYER FOR RELIEF

Wherefore, Plaintiff respectfully requests an award of the following relief:

A. A declaratory judgment that the actions described herein constitute a violation of a violation of 18 U.S.C. § 248, and 42 U.S.C. §§ 1985 and 1986;

B. Appropriate injunctive relief;

C. Compensatory damages in an amount to be determined by the jury at trial;

D. Punitive damages in an amount to be determined by the jury at trial;

E. An award of costs and reasonable attorneys' fees pursuant to 18 U.S.C. § 248, and 42 U.S.C. § 1988;

F. Such other relief as the Court deems necessary and just.

JURY DEMAND

Plaintiff demands a jury trial on all issues triable.

Dated: July 7, 2024

Respectfully submitted,

By: /s/ Mark L. Javitch

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