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11 SAM LINGROSSO

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
13 **COUNTY OF LOS ANGELES**

14 SAM LINGROSSO, an individual,

15 Plaintiff,

16 vs.

17 TRUSTEES OF THE CALIFORNIA  
18 STATE UNIVERSITY, a division of the  
19 State of California; and CHRISTINA L.  
20 VON MAYRHAUSER, an individual;

21 Defendants.

Case No.: 25LBCV01519

22 **FIRST AMENDED COMPLAINT**  
23 **FOR DAMAGES AND EQUITABLE**  
24 **RELIEF**

- 25 1. Discrimination on the Basis of  
26 Religious Creed, Ancestry and/or Race  
27 in Violation of the Fair Employment  
28 and Housing Act ("FEHA")
2. Harassment in Violation of the FEHA
3. Retaliation in Violation of the FEHA
4. Failure to Prevent Discrimination and  
Retaliation from Occurring in  
Violation of the FEHA

Unlimited Civil Action  
Amount Demanded Exceeds \$35,000  
Jury Trial Demanded

**FIRST AMENDED COMPLAINT FOR**  
**DAMAGES AND EQUITABLE RELIEF**

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SAM LINGROSSO (“Plaintiff”) brings these causes of action against Defendants TRUSTEES OF THE CALIFORNIA STATE UNIVERSITY (“Defendant” or “Trustees”), and Christina L. Von Mayrhauser and each of them (collectively referred to as “Defendants”), and alleges as follows:

## **I. JURISDICTION AND VENUE**

1. This Court has jurisdiction over this action pursuant to California Code of Civil Procedure § 410.10 because Defendants are residents of, or are doing business in, California.
2. Venue is proper in the County of Los Angeles pursuant to California Code of Civil Procedure §§ 395(a) and 395.5 because a substantial part of the events or omissions giving rise to the claim occurred in this county, and Defendants are located in this county.

## **II. THE PARTIES**

3. At all relevant times, Plaintiff was an individual and an employee of Defendant. Plaintiff became employed by Defendant as the Director of Academic Employee Relations at California State University Northridge (“CSUN”) on or about June 24, 2024 and his employment was terminated effective December 16, 2024.
4. Defendant, the Trustees, is part of the State of California acting in its higher education capacity, through the California State University system. Trustees is incorporated as, and governed by, the Board of Trustees of the California State

University, which oversees all public universities in the Trustees, including CSUN. CSUN is a California public university located in Northridge, a neighborhood in the San Fernando Valley region of the City of Los Angeles.

5. At all times herein alleged in this First Amended Complaint (“FAC”), Plaintiff worked on the CSUN campus and was employed by Trustees, the properly named Defendant in this action.
6. Christina L. Von Mayrhauser ("Von Mayrhauser"), is a natural person and at all relevant times, was serving as the Interim Associate Vice President for Faculty Affairs at Trustees and was Plaintiff's immediate supervisor. In this capacity, she oversaw faculty-related policies and procedures, including recruitment, retention, promotion, and tenure processes. Her responsibilities encompassed managing faculty hiring, ensuring compliance with Trustees' policies and state and federal employment laws, and addressing workplace conflicts involving faculty. Additionally, she acted as a liaison between faculty members and CSUN administration, providing strategic leadership in resolving complex issues affecting faculty and academic staff. At all times relevant to this FAC, Von Mayrhauser was acting in a supervisory role and was an agent, representative, and/or employee of Trustees. Defendant Von Mayrhauser terminated Plaintiff, effective December 16, 2024 because of his political views against antisemitism and advocacy on behalf of Jewish students and faculty.
7. At all relevant times, Trustees faculty, staff, administration, and other employees and/or affiliates (“Trustees Agents”) were acting within the scope of their employment and/or at the direction and control of Trustees. Moreover, at all relevant

1 times, appropriate Trustees Agents were made aware of and took no action against  
2 the conduct of its agents, thereby ratifying their conduct and rendering Trustees  
3 liable for the conduct of its agents.

- 4 8. Each Defendant is sued as the agent and/or employer of each other acting in the  
5 course and scope of such employment or alternatively, acting beyond the course and  
6 scope of their authority. Without waiving the alternative pleading, reference in this  
7 complaint to these Defendants' capacity will be within the course and scope of their  
8 authority. Reference made in this complaint to "Defendants" shall be deemed to  
9 mean the acts of Defendants acting individually, jointly, and/or severally.  
10

11  
12 **III. EXHAUSTION OF ADMINISTRATIVE REMEDIES**

- 13 9. Plaintiff has exhausted his administrative remedies under the Fair Employment and  
14 Housing Act and has obtained a Right to Sue letter, a true and correct copy of which  
15 is attached hereto as Exhibit A.  
16

17  
18 **IV. FACTS COMMON TO ALL CAUSES OF ACTION**

19 **A. Plaintiff's Exemplary Background And Professional**  
20 **Qualifications**

- 21 10. Plaintiff holds a Bachelor of Arts degree from Loyola Marymount University (1995), a  
22 Master of Arts from California State University, Long Beach (2002), and another  
23 Master of Arts from Claremont Graduate University (2010). As the CSUN Director  
24 of Academic Employee Relations, Plaintiff's duties encompassed a broad range of  
25 responsibilities aimed at fostering a positive and productive work environment for  
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1 academic staff and faculty. These duties included mediating disputes between faculty  
2 and administration, ensuring compliance with CSUN policies and employment laws,  
3 managing employee grievances, resolving workplace conflicts, and providing  
4 guidance and training on workplace issues. Plaintiff also investigated complaints  
5 related to harassment, discrimination, and retaliation and developed strategies to  
6 improve employee relations and engagement.  
7

8 11. Throughout his career, Plaintiff has been widely regarded as an effective mediator  
9 and advocate for workplace fairness and inclusivity. He has a proven track record of  
10 fostering collaborative environments and resolving complex employment disputes in  
11 a manner that respects institutional values and individual rights. Before assuming  
12 the role of Director of Academic Employee Relations at CSUN, Plaintiff held key  
13 leadership positions in both public and private institutions of higher education,  
14 where he honed his skills in policy implementation, conflict management, and legal  
15 compliance.  
16

17 12. Plaintiff's professional philosophy is centered on bridging communication gaps  
18 between employees and leadership, ensuring that all voices are heard, and  
19 advocating for solutions that align with organizational goals while addressing the  
20 specific needs of individuals. He is particularly skilled at navigating highly sensitive  
21 workplace issues, including those involving discrimination, harassment, and  
22 retaliation, and has earned the respect of peers and subordinates alike for his  
23 integrity, impartiality, and dedication to equity.  
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1 13. In addition to his administrative roles, Plaintiff has contributed to the field of  
2 employee relations through training workshops, policy development initiatives, and  
3 mentorship programs aimed at building leadership capacity among faculty and staff.  
4 His efforts have consistently resulted in improved workplace morale, increased  
5 employee engagement, and enhanced compliance with state and federal employment  
6 laws. Plaintiff's expertise in these areas has made him a sought-after leader in the  
7 academic sector, particularly in institutions with diverse faculty and student  
8 populations.  
9

10 14. Plaintiff's tenure at CSUN was marked by his proactive approach to addressing  
11 faculty and staff concerns, mediating disputes, and fostering a culture of mutual  
12 respect. His commitment to upholding institutional policies, combined with his deep  
13 understanding of employment law and workplace dynamics, equipped him to handle  
14 even the most contentious issues with professionalism and sensitivity. Plaintiff's  
15 robust educational foundation, coupled with his extensive experience in higher  
16 education, has positioned him as a dedicated and capable advocate for fairness and  
17 inclusion in academic settings. These attributes made him an ideal candidate to lead  
18 efforts in resolving faculty disputes and promoting a positive work environment at  
19 CSUN. However, as detailed in the Statement of Facts, Plaintiff's advocacy for  
20 marginalized groups, including the Jewish community, was met with resistance and  
21 retaliation, culminating in the events that are the basis of this complaint.  
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**B. Jewish Faculty Member Gary Katz's Raised Safety Concerns  
Based On Anniversary Of October 7, 2023 Terrorist Attacks In  
Israel**

15. At the direction of her supervisor Von Mayrhauser, in or about September 2024, Plaintiff was assigned to address concerns raised by faculty member Gary Katz, Ph.D. ("Professor Katz"). At all relevant times, Professor Katz served as an Associate Professor in the CSUN Department of Psychology and was the Graduate Coordinator for the Psychology Department as well as the Chair of the Graduate M.A. Program in Clinical Psychology. Professor Katz is also a Founder of Matadors Against Antisemitism (MAA), a campus-based Jewish advocacy group composed of faculty and staff.

16. Professor Katz's concerns revolved around the upcoming anniversary of the October 7, 2023, terrorist attacks against Israel. Professor Katz expressed fears regarding the safety of Jewish faculty and students on campus, citing a perceived increase in hostile rhetoric, anti-Semitic incidents, and threatening behaviors. He urged campus leadership to take preemptive measures to ensure safety but reported unsatisfactory responses to his warnings.

17. Plaintiff met with Professor Katz for approximately two hours. Professor Katz shared his safety concerns and described unsettling remarks written on posters he had displayed outside his office depicting American hostages in Israel. He further noted

1 that Jewish students had confided fears of harassment or violence, particularly in the  
2 context of pro-Palestinian demonstrations on campus.

3  
4 **C. Plaintiff Undertook Proactive Actions To Address Professor**  
5 **Gary Katz's Concerns**

6 18. Plaintiff contacted Chief Alfredo B. Fernandez ("Fernandez") of campus police to  
7 facilitate a safety plan for Professor Katz. Fernandez stated he would follow up with  
8 the assigned detective and provide an update. The following day, Fernandez informed  
9 Plaintiff that a camera had already been installed in the hallway overlooking  
10 Professor Katz's office and that Professor Katz could contact the detective to create a  
11 safety plan. Plaintiff promptly relayed this information to Professor Katz, who  
12 expressed appreciation for the assistance. Professor Katz's Email To The Jewish  
13 Campus Community Praising Plaintiff.

14  
15 19. On or about September 26, 2024, Professor Gary Katz, CSUN's Associate Professor of  
16 Psychology, sent an email to a campus listserv comprised of Jewish faculty and allies  
17 following a meeting CSUN's Campus Hillel<sup>1</sup>. In the email, Professor Katz described  
18 his recent interactions with Plaintiff, Sam Lingrosso, who had been newly appointed  
19 as Director of Academic Employee Relations. Professor Katz commended Plaintiff's  
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23 <sup>1</sup> Hillel is the largest Jewish campus organization in the world, dedicated to  
24 enriching the lives of Jewish students and fostering inclusive campus communities.  
25 At California State University, Northridge (TrusteesN), Hillel serves students across  
26 local campuses, providing cultural, educational, and religious programming, and  
27 offering support to those facing antisemitism or identity-based threats. (See Hillel  
International, "About Hillel," available at <https://www.hillel.org/about> (last accessed  
March 23, 2025)).

1 proactive efforts to address ongoing faculty safety concerns, particularly those  
2 impacting Jewish faculty during a time of heightened tensions. He wrote:

3 “I have been working with Sam for the past few weeks on a long-standing  
4 issue that I have with a member of my department and I have found him to  
5 be incredibly supportive, a great listener, and one who makes an all-out  
6 effort to understand what faculty members are experiencing – particularly  
7 in these difficult times. More importantly, Sam has been focused on DOING  
8 things rather than talking about them. Thanks to Sam’s intervention, I now  
9 have a security camera trained on my office door.”  
10

11  
12 20. Professor Katz further emphasized Plaintiff’s compassionate and thoughtful  
13 approach to faculty well-being, recounting how Plaintiff encouraged him to consider  
14 personal safety in light of increasing threats:

15 “Sam asked me a question I had been dismissing for a while: ‘I would like  
16 you to think about some practical aspects of your personal safety. Would you  
17 do that?’ ... Then he said, ‘I’d feel terrible if something happened and we  
18 hadn’t had this discussion.’”  
19

20 21. Professor Katz explained that Plaintiff had requested logistical details—such as his  
21 arrival times, parking habits, and class schedule—in order to share that information  
22 with Campus Police and allow them to assess possible changes to patrols for  
23 increased protection. Katz also noted Plaintiff’s desire to extend similar support to  
24 other faculty, stating:  
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1 “At the end of our meeting, Sam asked if there were any other Jewish (or  
2 non-Jewish) faculty who may feel more protected or more comfortable if he  
3 were able to provide a similar liaison service with campus police. I told Sam  
4 that I would forward this offer to this group.”

- 5  
6 22. Professor Katz closed the email by acknowledging the difficult reality Jewish faculty  
7 faced, writing, “We should not live in fear; however, we should also not be foolhardy,”  
8 and encouraged others to contact Plaintiff directly, noting that “he is aware of our  
9 group and our goals. He is also keenly aware of our vulnerabilities as Jewish faculty.”  
10  
11 23. Although Professor Katz’s intentions were to highlight Plaintiff’s responsiveness and  
12 commitment to faculty safety, the email was perceived by Defendant Von  
13 Mayrhauser as an implicit criticism of her and other campus leaders. The contrast  
14 between Plaintiff’s decisive actions and others’ inaction—particularly in Professor  
15 Katz’s statement that Plaintiff “has been focused on DOING things rather than  
16 talking about them”—was interpreted by Von Mayrhauser as a direct affront to her  
17 leadership. Her reaction was marked by visible displeasure and indignation, as she  
18 viewed the email as an attack on her authority and an attempt to undermine her  
19 credibility within the institution.  
20  
21 24. Rather than acknowledging the merits of Plaintiff’s work or the urgent safety issues  
22 being raised, Von Mayrhauser focused on the perceived critique, exacerbating the  
23 tension between herself and Plaintiff. Her conduct illustrated a pattern in which her  
24 personal sensitivities and concerns over reputation were prioritized above the safety  
25 and well-being of vulnerable faculty members.  
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- 1 25. This reaction occurred in the context of a broader, troubling climate at CSUN, where  
2 a vocal campus faction had been targeting Jewish faculty and students—blaming  
3 them for the alleged “genocide” of Palestinians and contributing to an increasingly  
4 hostile environment. This group unfairly singled out Jewish members of the campus  
5 community, promoting fear and discrimination. CSUN’s leadership, including Von  
6 Mayrhauser, failed to take meaningful action to confront this conduct, thereby  
7 fostering a climate of indifference toward antisemitism.  
8
- 9 26. In this broader context, Von Mayrhauser’s hostility toward Plaintiff was not simply a  
10 matter of professional disagreement. Her unwillingness to support Plaintiff’s efforts  
11 to protect Jewish faculty—including Professor Katz—reflected a deeper institutional  
12 failure to address discrimination and ensure campus safety. Her conduct further  
13 undermined CSUN’s stated commitments to inclusion, diversity, and the protection  
14 of all members of its academic community.  
15

16  
17 **D. Adverse Reaction From Christina L. Von Mayrhauser**  
18 **Regarding Plaintiff’s Proactive Actions To Protect The Jewish**  
19 **Campus Community**

- 20 27. Upon learning of Professor Katz’s email, Von Mayrhauser accused Plaintiff of making  
21 unauthorized promises regarding security measures. Plaintiff requested that Von  
22 Mayrhauser verify the facts with Fernandez, who confirmed that Plaintiff had  
23 accurately relayed information. Despite this confirmation, Von Mayrhauser  
24 maintained her accusations against Plaintiff.  
25  
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27

**E. Christina L. Von Mayrhauser Constructed False Allegations  
To Justify Plaintiff's Termination**

28. During the week of October 1, 2024, just prior to the October 7 anniversary, Plaintiff was instructed by Von Mayrhauser to draft a clarifying email regarding Plaintiff's inability to make security decisions. However, Plaintiff was explicitly forbidden from sending the email without Von Mayrhauser's prior review and approval.
29. Plaintiff stayed late that evening to draft the email and promptly sent it to Von Mayrhauser for her review. Despite this, Plaintiff did not receive clearance to send the email to the designated listserv.
30. The following week, Von Mayrhauser confronted Plaintiff in Plaintiff's office, demanding an explanation for why the clarifying email had not been sent. Plaintiff explained that Plaintiff was awaiting her review and confirmation. Von Mayrhauser repeatedly insisted that Plaintiff should have sent the email and failed to acknowledge receiving the draft that Plaintiff had sent the evening of their discussion with the Chief.
31. When Plaintiff offered to retrieve the email to demonstrate that it had been sent, Von Mayrhauser became increasingly angry. Plaintiff began feeling unwell and informed Von Mayrhauser of the need to leave due to feeling sick. Following this exchange, Plaintiff left the campus.
32. Subsequently, Plaintiff's doctor placed him on medical leave for 60 days. Upon Plaintiff's return to work on December 9, 2024, Plaintiff was placed on administrative leave. Plaintiff's supervisor informed Plaintiff that Plaintiff was not

1 fulfilling the needs of the position or the department and that Plaintiff would not be  
2 retained in the position. Plaintiff was presented with a letter offering three months  
3 of severance in exchange for signing a resignation letter. Plaintiff declined the offer.  
4

5 **F. Plaintiff Was Terminated For His Perceived Political Views**  
6 **Against Antisemitism And For Acting Swiftly And Decisively**  
7 **To Protect Jewish Faculty And Students**

8 33. Plaintiff alleges that CSUN's actions and inactions were influenced by animosity  
9 toward the Jewish community and concerns about backlash from campus groups  
10 critical of Israel. Plaintiff asserts that CSUN's failure to address safety concerns  
11 highlighted systemic bias and disregard for the rights of Jewish faculty and students.  
12 Plaintiff further contends that his termination was an act of retaliation, motivated by  
13 discriminatory attitudes toward his advocacy on behalf of Jewish faculty and  
14 students.  
15

16 34. Plaintiff alleges that CSUN prioritized appeasement of campus groups critical of  
17 Israel over the safety concerns of Jewish faculty and students. Plaintiff asserts that  
18 this bias undermined his ability to perform his duties and foster a safe, inclusive  
19 environment. He claims that his termination exemplifies a broader pattern of neglect  
20 and hostility toward the Jewish community on campus, fostering a hostile academic  
21 environment.  
22  
23

24 **G. CSUN Faculty Sound Alarm To Plaintiff On Rising**  
25 **Antisemitism And Campus Safety**

26 35. On October 2, 2024, Andrew Surmani, CSUN Professor of Music Industry Studies  
27 and Academic Lead, expressed grave concerns over the safety of Jewish faculty,  
28

1 students, and staff on campus. In an email addressed to Plaintiff, Professor Surmani  
2 highlighted the ongoing threats facing Jewish members of the campus community.  
3 He referenced multiple antisemitic incidents including the targeting of his colleague,  
4 Professor Gary Katz, and the broader Jewish community at CSUN. Professor  
5 Surmani noted the installation of a security camera outside Professor Katz's office as  
6 a precautionary measure against vandalism and antisemitic acts.  
7

8 36. Professor Surmani articulated a pervasive sense of fear among Jewish faculty and  
9 students, stemming from both physical safety threats and the potential for  
10 administrative retaliation or social ostracism. He questioned what actions could be  
11 taken to protect themselves from potential harassment and sought proactive  
12 measures to ensure their safety. This correspondence underscores the hostile and  
13 intimidating environment Jewish members of the CSUN community face,  
14 exacerbated by a perceived lack of adequate institutional response to antisemitic  
15 incidents.  
16  
17

18 37. Despite his own high-ranking role in academic leadership, Dr. Katz stated that he  
19 repeatedly encountered resistance and dismissal when raising antisemitism-related  
20 issues to CSUN administrators.  
21

22 38. Professor Katz expressed that Plaintiff's actions to protect Jewish faculty—  
23 particularly to himself—were unique and courageous, in contrast to an institutional  
24 culture of indifference. He described Plaintiff as “one of the only people actually doing  
25 anything.” Professor Katz's view underscores that Plaintiff's termination appears  
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1 retaliatory and unjustified in light of his earnest efforts to improve campus safety  
2 and compliance.

3 39. Professor Katz's experiences verify that Plaintiff's termination was not the result of  
4 performance issues, professional misconduct, or institutional restructuring. It was  
5 the culmination of a campaign—subtle in its methods but brutal in its effect—to  
6 isolate, discredit, and eliminate anyone who challenged CSUN's indifference toward  
7 Jewish suffering.

8  
9 40. Plaintiff was not terminated because he failed to do his job. He was terminated  
10 because he did it too well—because he dared to care, to act, and to lead when others  
11 would only hide.

12  
13 41. Professor Katz also conveyed concern for other Jewish faculty members at CSUN  
14 who were directly harassed by tenured colleagues. One was publicly scolded at a  
15 department meeting for supporting Jewish campus events. Despite strong  
16 administrative connections, this individual was too vulnerable in her employment  
17 status to speak publicly, reflecting a culture of intimidation.  
18

19  
20 **H. CSUN's Campaign of Silence: Retaliation Against**  
21 **Whistleblowers and Institutional Complicity in Antisemitism**

22 42. In July 2025, Professor Katz has courageously shattered CSUN's imposed silence  
23 persistent silence and inaction with a bold show of leadership. As Professor Katz  
24 eloquently stated: *"The problem is not that CSUN is the worst—it's that it thinks*  
25 *doing nothing is leadership."*  
26  
27

1 43. On May 28, 2025, Professor Katz, wore a Star of David sash at CSUN's  
2 commencement ceremony. Publicly and repeatedly, three graduating students—out  
3 of roughly 800—refused to shake his hand in front of nearly 10,000 in attendance. He  
4 identified this as a deliberate act of antisemitic insult, fueled by a painful conflation  
5 of Judaism and current geopolitical events. Professor Katz reported that Jewish  
6 members of the CSUN community have not felt welcome since Oct. 8, 2023, even  
7 under heightened physical security measures, underscoring a pervasive atmosphere  
8 of fear, exclusion, and intimidation. The incident was not an isolated gesture of  
9 disrespect but emblematic of broader campus apathy. It occurred openly before  
10 faculty, administrators, and public safety officials—including Los Angeles Police  
11 Department snipers stationed visibly on rooftops—yet no formal response or  
12 condemnation was issued. This commencement ceremony serves as a microcosm of  
13 the systemic failures described by Professor Katz—acts of antisemitic hostility  
14 unchallenged by university leadership, reinforcing the Plaintiff's core allegation that  
15 CSUN legitimizes an unsafe environment for Jewish-affiliated community members.  
16

17 44. Professor Katz confirms many of the allegations outlined in this First Amended FAC,  
18 as one of the few CSUN faculty members willing to speak publicly regarding the  
19 systemic failure of CSUN leadership to address antisemitism. Dr. Katz confirmed  
20 that CSUN's treatment of Plaintiff is consistent with his own negative experiences,  
21 describing CSUN leadership—including Von Mayrhauser and Vice President for  
22 Student Affairs, William Watkins—as passive and unwilling to act, even when  
23 presented with serious safety concerns.  
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- 1 45. Professor Katz recounted a chilling exchange with the Vice President for Student  
2 Affairs, William Watkins, who responded to his plea for action—*"Doing nothing and*  
3 *hoping for the best is not leadership"*—with the dismissive retort, *"That's your*  
4 *opinion."* This response epitomizes the administration's passive approach, which  
5 masks deeper complicity through neutrality.  
6
- 7 46. According to Professor Katz, what distinguished the Plaintiff was action. He recalled,  
8 Plaintiff as the only person who actually did something... Everyone else either  
9 deflected, delayed, or dismissed us." The plaintiff's efforts, involving campus security  
10 coordination, safety protocols, and open faculty dialogue, threatened the entrenched  
11 status quo and triggered CSUN's swift retaliation.  
12
- 13 47. As part of his activism, Professor Katz serves as a public leader of Matadors Against  
14 Antisemitism (MAA)—a network formed in Spring 2024 by Jewish and allied faculty  
15 and staff committed to combating antisemitism at CSUN through education,  
16 advocacy, and constructive engagement ([matadorsagainstantisemitism.com](https://matadorsagainstantisemitism.com),  
17 [jewishjournal.com](https://jewishjournal.com)). MAA's mission statement emphasizes that *"antisemitism has no*  
18 *place on campus"* and that its principles—diversity, inclusion, and belonging—must  
19 guide CSUN's leadership. Despite MAA's efforts—such as panel events and  
20 educational campaigns—**Professor Katz** highlighted that university administrators  
21 still *"nod and smile"* without meaningful follow-through.  
22
- 23 48. The handshake refusals at commencement described in paragraph \_\_\_\_ above, in full  
24 view of university leadership, demonstrate not only antisemitic behavior—but  
25 campus tolerance of it. This incident is a salient illustration of the hostile  
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1 environment Plaintiff sought to address. Professor Katz’s open expression of Jewish  
2 identity triggered direct rejection—an undeniable act of exclusion in an institutional  
3 ceremony meant to unify. That this conduct occurred unchallenged in front of  
4 thousands, including administrators, underscores the broader allegations of  
5 administrative inaction and the culture of “nodding and smiling” without substantive  
6 engagement.  
7

8 49. Professor Katz explained that he had sent approximately twelve separate emails to  
9 CSUN President Erika Beck between October 2020 and the present, each one raising  
10 urgent concerns about the rise of antisemitism and threats to campus safety. These  
11 emails—thoughtfully written and factually detailed—documented specific incidents,  
12 cited the fears of Jewish faculty and students, and pleaded for clear action, support,  
13 or even acknowledgment. Initially, Beck set up a meeting between Dr. Katz and  
14 Provost and Vice President for Academic Affairs, Meera Kamarraju. During that  
15 meeting, Dr. Katz presented a litany of issues and concerns to Kamarraju, only to be  
16 met with smiles, nods, and further inaction. Besides the first email, not a single  
17 additional message or plea received a direct response from President Beck. There  
18 were no replies, no acknowledgments of receipt, and no indication that the President  
19 had read or considered the concerns raised.  
20  
21  
22

23 50. This persistent silence was not an oversight. It reflected a deliberate and  
24 institutionalized pattern of disregard for Jewish voices and Jewish safety on campus.  
25 In an academic environment where diversity and inclusion are touted as core values,  
26 the total absence of engagement from the university’s highest official—despite over a  
27  
28

dozen attempts at dialogue—sent a devastating message: that the safety, dignity, and rights of Jewish faculty and students are not a priority at CSUN.

51. Professor Katz’s experience was not an isolated administrative lapse, but rather emblematic of a broader climate of institutional apathy. In the face of hate, the university’s leadership did not merely fail to act—it refused to listen. The stonewalling by President Beck, despite her legal, ethical, and moral obligations, reinforced the perception among Jewish members of the campus community that they were invisible, expendable, or worse—unwelcome.
52. This sustained indifference is especially egregious given Professor Katz’s standing: a tenured faculty member, nationally recognized leader, and public representative of Matadors Against Antisemitism. If even a person in his position could be ignored so thoroughly and systematically, what chance do junior or part-time faculty have to be heard, much less protected? The administration’s silence in the face of repeated, good-faith outreach is not simply neglectful—it is complicit.

**I. Plaintiff’s Termination Occurred Amid Escalating Antisemitic Harassment And Violence On U.S. Campuses, Including California State University Northridge, Led By Militant Student Groups And Enabled By Administrative Inaction**

53. In the aftermath of the October 7, 2023, there has been a dramatic and unprecedented rise in antisemitic activity on college and university campuses across the United States in the aftermath of the October 7, 2023, Hamas attack on Israel. The ADL documented a 321 percent increase in campus-based antisemitic incidents in 2023 compared to the previous year. This alarming trend continued into 2024,

1 with an additional 84 percent increase in such incidents reported during the early  
2 part of the year. [https://www.adl.org/resources/press-release/over-10000-antisemitic-](https://www.adl.org/resources/press-release/over-10000-antisemitic-incidents-recorded-us-oct-7-2023-according-adl)  
3 [incidents-recorded-us-oct-7-2023-according-adl](https://www.adl.org/resources/press-release/over-10000-antisemitic-incidents-recorded-us-oct-7-2023-according-adl) (Last accessed May 15, 2025). These  
4 campus incidents include, but are not limited to, targeted harassment of Jewish  
5 students, the spread of antisemitic rhetoric during protests and rallies, acts of  
6 vandalism involving Jewish symbols or student organizations, and efforts to  
7 intimidate or silence Jewish voices in academic and social settings. The ADL's  
8 findings reflect a hostile and unsafe environment for Jewish students and faculty on  
9 many campuses, undermining their right to equal access to education and full  
10 participation in university life. *Ibid.*

11  
12  
13 54. One particularly egregious incident occurred at The Cooper Union in New York City,  
14 where Jewish students were forced to barricade themselves inside the library on  
15 October 25, 2023. During a pro-Palestinian protest, demonstrators pounded on doors  
16 and windows while chanting threatening slogans. Campus security reportedly  
17 advised the students to remain hidden until the protest subsided.  
18 [https://www.reuters.com/legal/cooper-union-nyc-must-face-jewish-students-lawsuit-](https://www.reuters.com/legal/cooper-union-nyc-must-face-jewish-students-lawsuit-over-pro-palestinian-rally-2025-02-05/)  
19 [over-pro-palestinian-rally-2025-02-05/](https://www.reuters.com/legal/cooper-union-nyc-must-face-jewish-students-lawsuit-over-pro-palestinian-rally-2025-02-05/) (Last Accessed May 15, 2025).

20  
21  
22 55. Similarly, at the University of California, Berkeley, on October 18, 2023, a Jewish  
23 student was physically assaulted during a counter-protest after challenging  
24 demonstrators who were chanting slogans supportive of Hamas. Eyewitnesses  
25 reported that the student was punched and knocked to the ground by participants in  
26 the anti-Israel rally. See Aaron Bandler, Jewish Berkeley Student Punched at Rally  
27

1 for Challenging Pro-Hamas Chant, Jewish J. (Oct. 19, 2023),  
2 [https://jewishjournal.com/news/united-states/364211/jewish-berkeley-student-](https://jewishjournal.com/news/united-states/364211/jewish-berkeley-student-punched-at-rally-for-challenging-pro-hamas-chant/)  
3 [punched-at-rally-for-challenging-pro-hamas-chant/](https://jewishjournal.com/news/united-states/364211/jewish-berkeley-student-punched-at-rally-for-challenging-pro-hamas-chant/) (Last Accessed May 15, 2025).

4 56. Many of these incidents have been organized or incited by militant student groups,  
5 most notably Students for Justice in Palestine (“SJP”). The national organization and  
6 many of its campus chapters have promoted rhetoric that glorifies violence and  
7 justifies terrorist acts. At George Washington University, for example, SJP members  
8 projected messages such as “Glory to Our Martyrs” and “Free Palestine From the  
9 River to the Sea” onto the university library in October 2023—phrases widely  
10 understood to endorse terrorist violence and advocate for the elimination of the state  
11 of Israel. [https://www.foxnews.com/politics/george-washington-university-students-](https://www.foxnews.com/politics/george-washington-university-students-project-pro-palestinian-activism-school-library)  
12 [project-pro-palestinian-activism-school-library](https://www.foxnews.com/politics/george-washington-university-students-project-pro-palestinian-activism-school-library) (Last Assessed May 15, 2025).  
13  
14 57. Watchdog organizations such as the Clarion Project and the ADL have identified  
15 ideological and financial ties between SJP and external groups with connections to  
16 designated foreign terrorist organizations. This includes American Muslims for  
17 Palestine (“AMP”), which the ADL has characterized as having “significant overlap”  
18 with individuals formerly involved in the now-defunct Holy Land Foundation, a  
19 group that was shuttered for funneling material support to Hamas.  
20 <https://www.adl.org/resources/report/audit-antisemitic-incidents-2024> (Last Accessed  
21 May 15, 2025).  
22  
23  
24

25 58. CSUN is among the many campuses where SJP maintains an active presence. The  
26 ADL lists CSUN as a school with an active SJP chapter. <https://www.adl.org/campus->  
27

antisemitism-report-card/california-state-university-northridge (Last Accessed May 15, 2025). The SJP chapter at CSUN maintains a highly visible online presence and, in May 2024, organized a “Solidarity With Gaza” encampment to pressure the university into adopting anti-Israel positions. See Gisselle Medina, CSUN Students Start Daytime Solidarity With Gaza Encampment, San Fernando Valley Sun (May 8, 2024), <https://sanfernandosun.com/2024/05/08/csun-students-start-daytime-solidarity-with-gaza-encampment/> (Last Accessed May 15, 2025). CSUN’s SJP chapter has demanded that the school 1) divest from companies funding war and genocide; 2) reinvest in services for students and faculty; 3) cancel the California State University system’s contract with the University of Haifa; 4) protect academic freedoms for students and faculty; and 5) call for a permanent ceasefire in Gaza. Ibid.

59. Despite clear affiliations with groups that have glorified violence and engaged in intimidation, university administrations throughout the United States have largely continued to fund, recognize, or otherwise tolerate SJP chapters. In several instances, campus officials have either failed to condemn or actively downplayed the significance of antisemitic incidents. In response, the U.S. Department of Education’s Office for Civil Rights (“OCR”) opened Title VI investigations into numerous institutions, including Harvard University, the University of Pennsylvania, and Columbia University, for allegedly permitting hostile environments toward Jewish students. See Press Release, U.S. Dept. of Educ., U.S. Department of Education Opens Investigations into Harvard University, University of Pennsylvania, and



1 Columbia University Under Title VI of the Civil Rights Act of 1964 (Dec. 7, 2023),  
2 [https://www.ed.gov/about/news/press-release/ed-hhs-launch-title-vi-investigations-of-](https://www.ed.gov/about/news/press-release/ed-hhs-launch-title-vi-investigations-of-harvard-university-and-harvard-law-review-amid-allegations-of-discriminatory-practices#:~:text=ED's%20and%20HHS'%20OCR%20investigations,and%20activities%20receiving%20federal%20funding)  
3 [harvard-university-and-harvard-law-review-amid-allegations-of-discriminatory-](https://www.ed.gov/about/news/press-release/ed-hhs-launch-title-vi-investigations-of-harvard-university-and-harvard-law-review-amid-allegations-of-discriminatory-practices#:~:text=ED's%20and%20HHS'%20OCR%20investigations,and%20activities%20receiving%20federal%20funding)  
4 [practices#:~:text=ED's%20and%20HHS'%20OCR%20investigations,and%20activities](https://www.ed.gov/about/news/press-release/ed-hhs-launch-title-vi-investigations-of-harvard-university-and-harvard-law-review-amid-allegations-of-discriminatory-practices#:~:text=ED's%20and%20HHS'%20OCR%20investigations,and%20activities%20receiving%20federal%20funding)  
5 [%20receiving%20federal%20funding](https://www.ed.gov/about/news/press-release/ed-hhs-launch-title-vi-investigations-of-harvard-university-and-harvard-law-review-amid-allegations-of-discriminatory-practices#:~:text=ED's%20and%20HHS'%20OCR%20investigations,and%20activities%20receiving%20federal%20funding) (Last Accessed May 15, 2025).  
6

- 7 60. In March 2025, OCR sent letters to 60 universities across the country warning that  
8 failure to protect Jewish students from antisemitic discrimination may constitute a  
9 violation of federal civil rights laws. See Press Release, U.S. Dept. of Educ., OCR  
10 Sends Letters to 60 Universities Under Investigation for Antisemitic Harassment  
11 and Discrimination (Mar. 14, 2025), [https://www.ed.gov/about/news/press-release/us-](https://www.ed.gov/about/news/press-release/us-department-of-educations-office-civil-rights-sends-letters-60-universities-under-investigation-antisemitic-discrimination-and-harassment)  
12 [department-of-educations-office-civil-rights-sends-letters-60-universities-under-](https://www.ed.gov/about/news/press-release/us-department-of-educations-office-civil-rights-sends-letters-60-universities-under-investigation-antisemitic-discrimination-and-harassment)  
13 [investigation-antisemitic-discrimination-and-harassment](https://www.ed.gov/about/news/press-release/us-department-of-educations-office-civil-rights-sends-letters-60-universities-under-investigation-antisemitic-discrimination-and-harassment) (May 15, 2025).  
14
- 15 61. The failure of universities to take meaningful action—and in some cases, their  
16 implicit endorsement of antisemitic conduct—has created a pervasive climate of fear  
17 and intimidation for Jewish students and faculty. This environment violates their  
18 rights under Title VI of the Civil Rights Act of 1964 and contravenes institutional  
19 policies on hate speech, student conduct, and campus safety. Plaintiff's termination  
20 occurred squarely within this broader context of escalating antisemitism,  
21 administrative indifference, and growing hostility toward individuals who identified  
22 as Jewish or expressed support for Israel. The adverse actions taken against Plaintiff  
23 were not isolated or coincidental; rather, they were symptomatic of a national  
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1 university culture increasingly characterized by selective enforcement, tolerance for  
2 hate speech, and viewpoint-based discrimination.

3  
4 **J. California State University, Northridge's Institutional**  
5 **Tolerance Of Faculty-Led Antisemitic Advocacy, Failure To**  
6 **Address Hate Incidents, And Endorsement Of A Double**  
7 **Standard That Endangers Jewish Students And Faculty**

8 62. CSUN has been the site of repeated incidents of antisemitism involving both campus  
9 activity and conduct by faculty members. These incidents include overt hate speech  
10 and imagery, as well as faculty-led initiatives and rhetoric that promote militant  
11 anti-Israel agendas and support groups widely viewed as hostile to the Jewish  
12 community.

13 **1. Professor David Klein: Use Of California State**  
14 **University, Northridge's Platform For Antisemitic**  
15 **And Anti-Israel Advocacy**

16 63. Professor David Klein of CSUN's Department of Mathematics has actively used  
17 CSUN resources to promote antisemitic rhetoric and militant anti-Israel campaigns.  
18 Professor Klein maintains a Trustees-hosted webpage titled the "Boycott Israel  
19 Resource Page," in which he describes Israel as "the most racist state in the world at  
20 this time" and accuses it of "apartheid" and "ethnic cleansing." He also encourages  
21 academic, cultural, and economic boycotts of Israel in alignment with the Boycott,  
22 Divestment, and Sanctions (BDS) movement. See AMCHA Initiative, Trustees Web  
23 Page Called Anti-Semitic, [https://amchainitiative.org/csun-web-page-called-anti-](https://amchainitiative.org/csun-web-page-called-anti-semitic/)  
24 [semitic/](https://amchainitiative.org/csun-web-page-called-anti-semitic/) (Last Accessed May 15, 2025).  
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64. BDS is an acronym for Boycott, Divestment, Sanctions, a global movement initiated in 2005 by Palestinian civil society organizations. The BDS movement aims to apply economic and political pressure on Israel to comply with international law and respect Palestinian rights. It advocates for:

- A. Boycotts of Israeli products, academic institutions, and cultural events;
- B. Divestment from companies profiting from Israel's occupation of Palestinian territories; and
- C. Sanctions by governments against Israel.

According to the official BDS Movement website:

“BDS is a Palestinian-led movement for freedom, justice and equality. BDS upholds the simple principle that Palestinians are entitled to the same rights as the rest of humanity.” BDS Movement, <https://bdsmovement.net/> (Last Accessed May 15, 2025). Critics, however, including the Israeli government and many of its allies, argue that BDS is anti-Israel or even antisemitic in intent or effect. The Anti-Defamation League, for example, states: “Many of the founding goals of the BDS movement, and many of the strategies employed in BDS campaigns, are anti-Semitic.”

The Boycott, Divestment and Sanctions Campaign (BDS). Anti-Defamation League, <https://www.adl.org/resources/backgrounders/boycott-divestment-and-sanctions-campaign-bds> (May 15, 2025). The page includes graphic images purporting to show Palestinian children injured by Israeli forces and presents one-sided political content on the Israeli–Palestinian conflict. The presence of this material on an official

1 Trustees domain has drawn sharp rebuke from Jewish advocacy organizations,  
2 which argue that it violates political neutrality and fosters a hostile climate for  
3 Jewish students. *Ibid.*

4 65. In addition, Professor Klein has publicly opposed California State University study  
5 abroad programs in Israel, calling them part of a broader Israeli propaganda effort.  
6 He argued against the reinstatement of a suspended Trustees-Israel study program  
7 in an article published by The Electronic Intifada, aligning again with BDS  
8 objectives. See Nora Barrows-Friedman, California Professor Under Attack for  
9 Opposing “Study in Israel” Scheme, The Electronic Intifada (May 28, 2012),  
10 [https://electronicintifada.net/content/california-professor-under-attack-opposing-](https://electronicintifada.net/content/california-professor-under-attack-opposing-study-israel-scheme/10859)  
11 [study-israel-scheme/10859](https://electronicintifada.net/content/california-professor-under-attack-opposing-study-israel-scheme/10859) (Last Accessed May 15, 2025).  
12

13  
14 **2. Professor Theresa Montaña: Public Denouncement**  
15 **Of The Anti-Defamation League As A “White**  
16 **Supremacist Organization”**

17 66. In February 2021, Professor Theresa Montaña, a faculty member in the Department  
18 of Chicana/o Studies, appeared in a webinar titled “The Fight for Ethnic Studies,”  
19 during which she allegedly described the Anti-Defamation League (ADL)—a leading  
20 Jewish civil rights organization—as a “white supremacist” group. See Aaron  
21 Bandler, Trustees Prof. Allegedly Calls ADL a ‘White Supremacist Organization’,  
22 Jewish Journal (Feb. 23, 2021), [https://jewishjournal.com/news/332683/csun-prof-](https://jewishjournal.com/news/332683/csun-prof-allegedly-calls-adl-a-white-supremacist-organization/)  
23 [allegedly-calls-adl-a-white-supremacist-organization/](https://jewishjournal.com/news/332683/csun-prof-allegedly-calls-adl-a-white-supremacist-organization/) (Last Accessed May 15, 2025).  
24  
25 67. The ADL has been a longstanding leader in tracking and opposing hate crimes,  
26 including antisemitism. For Bandler to label it as a “white supremacist” organization  
27

1 is widely regarded as offensive and defamatory by Jewish civil rights groups. The  
2 incident has further exacerbated the perception among Jewish students and faculty  
3 that Trustees tolerates or enables antisemitic rhetoric from its faculty.

4  
5 **3. Professors Mary E. Rosen And Alexander Alekseenko:**  
6 **Public Endorsement Of Boycott, Divestment, And**  
7 **Sanctions (BDS) Campaign**

8 68. Professors Mary E. Rosen and Alexander Alekseenko, both faculty members in the  
9 Department of Mathematics, have also expressed public support for the Boycott,  
10 Divestment, and Sanctions (BDS) Campaign against Israel, which calls for a  
11 comprehensive academic, economic, and cultural boycott of the Jewish state. See  
12 Canary Mission, Mary Rosen, [https://canarymission.org/professor/Mary\\_Rosen](https://canarymission.org/professor/Mary_Rosen) (Last  
13 Accessed May 15, 2025); Canary Mission, Alexander Alekseenko,  
14 [https://canarymission.org/professor/Alexander\\_Alekseenko](https://canarymission.org/professor/Alexander_Alekseenko) (Last Accessed May 15,  
15 2025).

16  
17 69. The BDS movement is widely considered antisemitic by the U.S. government,  
18 including the Department of State, which has stated that delegitimizing Israel or  
19 holding it to a double standard constitutes antisemitism. Public affiliation with this  
20 movement by Trustees' faculty intensifies concerns that CSUN is institutionally  
21 tolerant of anti-Jewish bias.  
22

23 **4. Hate Speech And Antisemitic Graffiti On Campus**

24 70. In December 2018, swastikas and shooting threats were found in a men's bathroom  
25 on CSUN campus, prompting widespread concern from Jewish students and faculty.  
26  
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1 Aaron Bandler, Swastika, Shooting Threat Graffiti Found in CSUN Bathroom,  
2 Jewish Journal (Dec. 5, 2018),  
3 [https://jewishjournal.com/los\\_angeles/243231/swastika-shooting-threat-graffiti-found-](https://jewishjournal.com/los_angeles/243231/swastika-shooting-threat-graffiti-found-csun-bathroom/)  
4 [csun-bathroom/](https://jewishjournal.com/los_angeles/243231/swastika-shooting-threat-graffiti-found-csun-bathroom/) (Last Accessed May 15, 2025).

- 5  
6 71. The graffiti included a drawing of a swastika and phrases threatening violence,  
7 including “I’m shooting up the school Monday morning.” Despite condemnation by  
8 campus officials, the appearance of such antisemitic symbols and threats contributes  
9 to a documented pattern of hostile conduct targeting Jewish students.
- 10  
11 72. During the Fall 2023 Israel– Hamas war, campus tensions spiked and blurred the  
12 line between political protest and antisemitism. In the midst of this conflict, the  
13 CSUN chapter of Students for Justice in Palestine (“SJP”) organized a large walkout  
14 and rally on November 30, 2023. Over a hundred students gathered by the campus  
15 library to protest the university’s neutrality and U.S. support for Israel.  
16 [https://sundial.csun.edu/177285/news/student-organization-holds-protest-for-](https://sundial.csun.edu/177285/news/student-organization-holds-protest-for-palestine/#:~:text=Walk%20to%20protest%20CSUN%E2%80%99s%20continued,Ham)  
17 [palestine/#:~:text=Walk%20to%20protest%20CSUN%E2%80%99s%20continued,Ham](https://sundial.csun.edu/177285/news/student-organization-holds-protest-for-palestine/#:~:text=Walk%20to%20protest%20CSUN%E2%80%99s%20continued,Ham)  
18 [as%20war.](https://sundial.csun.edu/177285/news/student-organization-holds-protest-for-palestine/#:~:text=Walk%20to%20protest%20CSUN%E2%80%99s%20continued,Ham) At this protest, SJP members led chants and made statements that  
19 Jewish organizations later flagged as antisemitic or extremism-tinged. For example,  
20 demonstrators chanted “From the river to the sea, Palestine will be free,” a slogan  
21 many Jewish groups interpret as a call to eliminate Israel. *Ibid.* SJP speakers also  
22 denounced the Anti-Defamation League as a “pro-Zionist” group, dismissing the  
23 ADL’s warnings about rising antisemitism as biased. *Ibid.*
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1 73. SJP's open support for the Palestinian cause extended to defending or downplaying  
2 Hamas: the club had faced criticism for endorsing statements justifying Hamas's  
3 actions, which led the ADL to label SJP itself an antisemitic organization spreading  
4 "dangerous rhetoric." The ADL explicitly called out CSUN's SJP chapter, saying its  
5 rhetoric and support for a group like Hamas (officially compared by Israel to ISIS)  
6 crossed into antisemitism. Ibid. SJP leaders, when confronted, responded that it's  
7 "not [our] job to say what Hamas is or isn't" and insisted their focus was on ending  
8 Israeli "occupation" and "colonialism," not on targeting Jews. Ibid.

10 74. Nonetheless, Jewish students reported feeling anxious seeing such hostile rhetoric on  
11 their campus, especially chants that implicitly call for the dismantling of Israel. The  
12 climate at CSUN by late 2023 reflected the broader polarization over Israel-  
13 Palestine, which at times veered into antisemitic tropes (e.g. vilifying Jewish  
14 organizations like the ADL).

## 17 **5. Formal Student Government Resolution Condemning** 18 **Antisemitism**

19 75. In December 2020, CSUN Associated Students passed Senate Bill 2020-21-006,  
20 condemning antisemitism on campus. The resolution adopted the International  
21 Holocaust Remembrance Alliance (IHRA) definition of antisemitism and committed  
22 the student government to proactive monitoring and reporting of antisemitic acts.  
23 Associated Students, Senate Bill 2020-21-006: A Resolution to Condemn  
24 Antisemitism on Campus, Trustees Today (Dec. 8, 2020),  
25 <https://csunshinetoday.csun.edu/community/associated-students-passes-senate-bill->  
26

1 to-condemn-anti-semitism-on-campus/ (Last Accessed May 15, 2025). While  
2 commendable, this resolution has not curtailed the public actions or statements by  
3 certain faculty members that continue to create a hostile educational environment for  
4 Jewish students, faculty, and staff.

5 76. Trustees' repeated failure to discipline faculty members who publicly advocate  
6 antisemitic ideas or promote hostile anti-Israel ideologies—combined with reported  
7 incidents of hate speech, vandalism, and threats—has created an atmosphere in  
8 which Jewish students and faculty reasonably fear discrimination, harassment, and  
9 exclusion. CSUN's acceptance of such conduct under the guise of "academic freedom"  
10 has enabled this environment to persist, despite public commitments to diversity and  
11 inclusion.  
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15 **K. Administrative Indifference, Retaliation, And Institutional**  
16 **Failure: Trustees Leadership And Trustees' Role In Enabling**  
17 **Antisemitism**

18 77. Trustees' repeated failure to discipline faculty members who publicly advocate  
19 antisemitic ideas or promote hostile anti-Israel ideologies—combined with reported  
20 incidents of hate speech, vandalism, and threats—has created an atmosphere in  
21 which Jewish students and faculty reasonably fear discrimination, harassment, and  
22 exclusion. CSUN's defense of such conduct under the guise of "academic freedom" or  
23 "free speech" has enabled this environment to persist, despite public commitments to  
24 diversity and inclusion. Within this context, it is hardly surprising that Plaintiff's  
25 courageous actions to protect Jewish faculty and students from the threat of harm  
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1 were met with hostility, culminating in retaliatory termination. Rather than being  
2 commended for taking meaningful and lawful steps to support a vulnerable campus  
3 community, Plaintiff was punished for standing up against bigotry and intolerance  
4 that CSUN has consistently failed to address. Plaintiff's termination is not an  
5 isolated event, but is instead consistent with—and part of—a broader pattern of  
6 antisemitic attitudes and discriminatory practices among Trustees administration.  
7

8 78. Ultimately, it is both the CSUN administration, appointed by the Trustees, and the  
9 Trustees themselves who must be held accountable for this pervasive failure. Their  
10 inaction in the face of escalating antisemitic hostility on campus—and their direct  
11 role in terminating Plaintiff for having the courage to speak out against it—  
12 demonstrates not only institutional indifference, but a blatant disregard for the  
13 safety and rights of Jewish faculty and students. The Trustees' continued failure to  
14 act, both generally and in this specific case, reflects a systemic abdication of  
15 responsibility and a breach of their obligation to uphold a safe and inclusive learning  
16 environment.  
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19  
20 **L. Plaintiff's Support For Academic Freedom Amid Concerns**  
21 **Over BDS Advocacy And Evidence Of Anti-Jewish Bias On**  
22 **Campus**

23 79. Plaintiff does not, in any way, seek to restrict the rights of any CSUN professor to  
24 express personal views or opinions regarding the BDS movement, Israeli policy, or  
25 any related political or cultural issues. Plaintiff fully respects the principles of  
26 academic freedom and the right to engage in open discourse on matters of public  
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1 concern. However, the public positions taken by certain faculty members—including  
2 those promoting or aligning with BDS—are relevant because they illustrate a  
3 broader pattern of anti-Jewish bias that exists on the CSUN campus. These public  
4 statements contribute to a hostile environment for Jewish students and faculty, and  
5 are indicative of the underlying discriminatory attitudes that Plaintiff believes are at  
6 the heart of this case.  
7

8  
9 **M. Plaintiff Is A Member Of A Protected Class Within The Scope  
10 Of The Fair Employment and Housing Act (FEHA)**

11 80. The Fair Employment and Housing Act (FEHA) provides protections to individuals  
12 involved in supporting or participating in investigations or remediation of claims  
13 related to retaliation, harassment, or discrimination. Specifically, California  
14 Government Code § 12940(h) states that it is an unlawful employment practice for an  
15 employer to retaliate against any person for opposing any practices forbidden under  
16 the FEHA or for filing a complaint, testifying, or assisting in any FEHA-related  
17 proceeding. Additionally, California Code of Regulations, Title 2, § 11021 further  
18 clarifies these protections by emphasizing the illegality of retaliation against  
19 individuals who participate in the enforcement of FEHA rights. This statutory  
20 framework is designed to ensure that individuals who engage in activities to address  
21 or report discriminatory practices are protected from adverse employment actions,  
22 thereby promoting a workplace environment that supports equality and justice. On  
23 September 28, 2023, the Biden Administration issued a Fact Sheet clarifying that  
24 Title VI of the Civil Rights Act of 1964 prohibits certain forms of antisemitic,  
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1 Islamophobic, and related forms of discrimination in federally funded programs and  
2 activities. It emphasized that “Title VI of the 1964 Civil Rights Act applies to all  
3 programs and activities supported by federal financial assistance. Thus, these  
4 protections are wide-ranging and provide important tools to prevent and curb  
5 discrimination.” See THE WHITE HOUSE, FACT SHEET: BIDEN-HARRIS  
6 ADMINISTRATION TAKES LANDMARK STEP TO COUNTER ANTISEMITISM  
7 (Sept. 28, 2023)[https://bidenwhitehouse.archives.gov/briefing-room/statements-](https://bidenwhitehouse.archives.gov/briefing-room/statements-releases/2023/09/28/fact-sheet-biden-harris-administration-takes-landmark-step-to-counter-antisemitism/)  
8 [releases/2023/09/28/fact-sheet-biden-harris-administration-takes-landmark-step-to-](https://bidenwhitehouse.archives.gov/briefing-room/statements-releases/2023/09/28/fact-sheet-biden-harris-administration-takes-landmark-step-to-counter-antisemitism/)  
9 [counter-antisemitism/](https://bidenwhitehouse.archives.gov/briefing-room/statements-releases/2023/09/28/fact-sheet-biden-harris-administration-takes-landmark-step-to-counter-antisemitism/) (Last Accessed May 15, 2025). Title VI of the Civil Rights Act  
10 applies to any “program or activity receiving Federal financial assistance.” 42 U.S.C.  
11 § 2000d. California courts regularly look to Title VII and its application to enforce  
12 FEHA.

13  
14  
15 81. Discrimination based on religious belief, as well as on shared ancestry or ethnic  
16 characteristics, is prohibited under FEHA. Plaintiff has demonstrated strong  
17 conviction against antisemitism and has taken affirmative steps to protect Jewish  
18 faculty and students. Accordingly, Plaintiff is a member of a protected class within  
19 the scope of FEHA’s protections.  
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1                   **V. CAUSES OF ACTION**

2                                   **FIRST CAUSE OF ACTION**

3                                   **DISCRIMINATION IN VIOLATION OF THE FAIR EMPLOYMENT AND**

4                                   **HOUSING ACT, GOVT. CODE §§ 12940 et seq.**

5                                   **(As To Defendant Trustees)**

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7       82. Plaintiff hereby re-alleges and incorporates by reference all previous paragraphs,  
8       inclusive, of this FAC as though set forth in full.

9       83. Plaintiff alleges discrimination in violation of the Fair Employment and Housing Act  
10       ("FEHA"), as codified in Government Code §§ 12940 et seq., against Defendants.

11       Specifically, Government Code § 12940, subdivision (a), provides that it is an  
12       unlawful employment practice for an employer to discriminate against a person in  
13       compensation or in terms, conditions, or privileges of employment because of  
14       religious creed, ancestry and/or race.

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17       84. Plaintiff asserts that the Defendants, by their actions, policies, and practices, have  
18       engaged in unlawful employment practices by discriminating against him on the  
19       basis of his religious creed, ancestry and/or race. This discrimination was manifest  
20       through Defendants' negative reactions, adverse employment actions, and ultimately  
21       Plaintiff's termination as a direct result of Plaintiff's proactive efforts to protect the  
22       safety and well-being of Jewish faculty and students at CSUN, in response to  
23       identified safety risks and concerns that were specifically related to their religious  
24       identity.  
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1 85. Plaintiff asserts that the Defendants, by their actions, policies, and practices, have  
2 engaged in unlawful employment practices by discriminating against him on the  
3 basis of religious creed, ancestry and/or race. The treatment Plaintiff endured at the  
4 hands of Defendants, including but not limited to, differential treatment, exclusion  
5 from meetings, corporate decision-making processes, and his eventual termination  
6 would not have occurred if the religious creed, ancestry and/or race of the individuals  
7 involved in the events set forth in this FAC were not Jewish. This discrimination  
8 manifestly violates FEHA's clear mandate against such discrimination in  
9 employment.  
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11  
12 86. As a proximate result of Defendants' conduct, Plaintiff has suffered and will continue  
13 to suffer damage to his career, loss of earnings, benefits, and other compensatory  
14 damages, in amounts to be proven at trial. By reason of the discriminatory conduct  
15 and as detailed herein, Plaintiff has also endured mental and emotional distress, for  
16 which he seeks compensatory damages.  
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18 87. Defendants are liable for the discrimination against Plaintiff and the damages  
19 flowing therefrom as outlined and prohibited under Government Code § 12940, sub.  
20 (a). Plaintiff has not yet ascertained the full extent of these damages but will amend  
21 this Complaint at such time as they are fully ascertained.  
22

23 88. By reason of the above-described discriminatory practices, Plaintiff has necessarily  
24 retained attorneys to prosecute this action and is, therefore, entitled to reasonable  
25 attorney's fees and costs pursuant to Government Code § 12965, subdivision (b), in  
26 addition to other damages as provided by law and as alleged herein.  
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SECOND CAUSE OF ACTION

**HARRASSMENT IN VIOLATION OF THE FAIR EMPLOYMENT AND**

**HOUSING ACT, GOVT. CODE §§ 12940 et seq.**

**(As To All Defendants)**

89. Plaintiff hereby re-alleges and incorporates by reference all previous paragraphs, inclusive, of this FAC as though set forth in full.

90. Plaintiff alleges harassment in violation of the FEHA, against Defendants.

Specifically, Government Code § 12940, subdivision (j)(1), provides that it is an unlawful employment practice for an employer, or any individual acting on behalf of the employer, to harass an employee on the basis of religious creed, ancestry and/or race.

91. Plaintiff asserts that the Defendants, through their actions and inactions, have engaged in, permitted, and failed to take all reasonable steps to prevent harassment against Plaintiff on the basis of religious creed, ancestry and/or race. This harassment was manifest through a series of adverse actions, including but not limited to, the unwarranted criticism, undermining, and eventual termination of Plaintiff as a direct consequence of Plaintiff's proactive efforts to protect the safety and well-being of Jewish faculty and students at Trustees in response to identified safety risks and concerns that were specifically related to religious identity.

92. The hostile work environment created by Defendants was severe and pervasive enough to alter the conditions of Plaintiff's employment and constituted an abusive

1 working environment, thereby violating the provisions of FEHA as outlined in  
2 Government Code § 12940, subdivision (j)(1).

3 93. As a direct and proximate result of Defendants' conduct, Plaintiff has suffered, and  
4 continues to suffer, significant emotional distress, humiliation, anxiety, and other  
5 psychological injuries, all to his damage in a sum to be established according to proof  
6 at trial.

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8 94. By reason of the above, Defendants are liable for creating and maintaining a hostile  
9 work environment against Plaintiff and the damages flowing therefrom as outlined  
10 and prohibited under Government Code § 12940, subdivision (j). Plaintiff has not yet  
11 ascertained the full extent of these damages but will amend this FAC at such time as  
12 they are fully ascertained.

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14 95. By reason of the conduct described herein, Plaintiff has necessarily retained  
15 attorneys to prosecute this action and is, therefore, entitled to reasonable attorney's  
16 fees and costs pursuant to Government Code § 12965, subdivision (b), in addition to  
17 other damages as provided by law and as alleged herein.  
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19 **THIRD CAUSE OF ACTION**

20 **RETALIATION IN VIOLATION OF FEHA**

21 **(As To Defendant Trustees)**

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23 96. Plaintiff hereby re-alleges and incorporates by reference all previous paragraphs,  
24 inclusive, of this FAC as though set forth in full.

25 97. Plaintiff alleges retaliation in violation of the Fair Employment and Housing Act  
26 ("FEHA"), as codified in Government Code §§ 12940 et seq., against Defendants.  
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**FIRST AMENDED COMPLAINT FOR  
DAMAGES AND EQUITABLE RELIEF**

Specifically, Government Code § 12940, subdivision (h), provides that it is an unlawful employment practice for an employer to retaliate against a person for opposing any practice forbidden under the FEHA or for filing a complaint, testifying, or assisting in proceedings under the FEHA.

98. Plaintiff engaged in protected activities under the FEHA by acting to protect the safety and well-being of Jewish faculty and students at Trustees in light of identified safety risks and concerns related to their religious identity. Plaintiff's actions included, but were not limited to, directly addressing the safety concerns of Jewish faculty member Professor Gary Katz, facilitating the installation of security measures, and advocating for a campus environment that respects and protects the rights and safety of all members of the CSUN community, irrespective of their religious creed, ancestry and/or race.

99. Despite Plaintiff's protected activities, Defendants engaged in retaliatory conduct against Plaintiff, culminating in adverse employment actions, including but not limited to unwarranted criticism, the construction of false allegations, and ultimately, Plaintiff's wrongful termination from employment. These actions were taken in direct response to Plaintiff's efforts to fulfill his professional responsibilities while advocating for the safety and rights of Jewish students and faculty, thus constituting retaliation under the FEHA.

100. As a direct and proximate result of Defendants' retaliatory conduct, Plaintiff has suffered, and continues to suffer, significant harm, including loss of employment,



1 damage to professional reputation, emotional distress, and other damages, in  
2 amounts to be established according to proof at trial.

3 101. By reason of the above, Defendants are liable for retaliation against Plaintiff in  
4 violation of the FEHA, and Plaintiff is entitled to damages as outlined and prohibited  
5 under Government Code § 12940, subdivision (h). Plaintiff has not yet ascertained  
6 the full extent of these damages but will amend this FAC at such time as they are  
7 fully ascertained.

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9 102. By reason of the conduct described herein, Plaintiff has necessarily retained  
10 attorneys to prosecute this action and is, therefore, entitled to reasonable attorney's  
11 fees and costs pursuant to Government Code § 12965, subdivision (b), in addition to  
12 other damages as provided by law and as alleged herein.

#### 13 14 **FOURTH CAUSE OF ACTION**

#### 15 **FAILURE TO PREVENT DISCRIMINATION, HARASSMENT, AND**

#### 16 **RETALIATION IN VIOLATION OF FEHA**

#### 17 **(As To Defendant Trustees)**

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19 103. Plaintiff hereby re-alleges and incorporates by reference all previous paragraphs,  
20 inclusive, of this FAC as though set forth in full.

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22 104. Plaintiff alleges that Defendants, and each of them, failed to take reasonable steps  
23 to prevent discrimination, harassment, and retaliation against Plaintiff on the basis  
24 of religious creed, ancestry and/or race, in violation of the FEHA Despite Plaintiff's  
25 proactive and lawful efforts to protect the safety and well-being of Jewish faculty and  
26 students at Trustees in light of identified safety risks and concerns related to their  
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1 religious identity, Defendants, and each of them, engaged in a pattern of conduct that  
2 allowed an environment where discrimination, harassment, and retaliation could  
3 flourish unchecked.

4 105. Specifically, Plaintiff was subjected to adverse employment actions, including but  
5 not limited to unwarranted criticism, false allegations, and wrongful termination, as  
6 a direct consequence of Plaintiff's fulfillment of his professional responsibilities and  
7 his advocacy for the safety and rights of Jewish students and faculty. Such actions by  
8 Defendants, and each of them, constitute a failure to prevent discrimination,  
9 harassment, and retaliation as required under FEHA.  
10

11 106. Defendants, and each of them, knew or should have known of the need to take  
12 preventive measures but failed to implement or enforce any sufficient policy,  
13 training, or corrective actions that would adequately address and prevent the  
14 discrimination, harassment, and retaliation experienced by Plaintiff. This failure  
15 directly contributed to the hostile work environment that Plaintiff endured and the  
16 subsequent damages Plaintiff suffered as a result.  
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18 107. By reason of the above-stated failures, Plaintiff has suffered, and continues to  
19 suffer, significant harm, including but not limited to, emotional distress, humiliation,  
20 loss of professional reputation, and other damages, in amounts to be established  
21 according to proof at trial.  
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1                   **VI.     INJUNCTIVE AND DECLARATORY RELIEF ALLEGATIONS**

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3   108.   Plaintiff hereby incorporates by reference all preceding paragraphs as though fully  
4       set forth herein.

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6   109.   Plaintiff seeks injunctive relief pursuant to California Code of Civil Procedure §  
7       526, et seq., and declaratory relief under the California Declaratory Judgment Act,  
8       Code of Civil Procedure § 1060, et seq., to prevent ongoing and future violations of his  
9       rights under FEHA and related statutes.

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11   110.   Plaintiff alleges that Defendants have engaged in practices that have caused, and  
12       will continue to cause, significant harm to Plaintiff and the broader Jewish  
13       community at CSUN. These practices include, but are not limited to, discriminatory,  
14       retaliatory, and harassing actions against Plaintiff for his advocacy on behalf of  
15       Jewish faculty and students, as well as Defendants' failure to take adequate  
16       measures to prevent such conduct.

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18   111.   Plaintiff seeks a judicial declaration that Defendants' actions and omissions  
19       constituted discrimination, harassment, and retaliation in violation of FEHA, and  
20       that these actions have created a hostile and unsafe environment for Jewish faculty  
21       and students at CSUN.

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23   112.   Plaintiff further seeks injunctive relief requiring Defendants to implement and  
24       enforce policies and procedures designed to prevent discrimination, harassment, and  
25       retaliation based on religious creed, ancestry, and/or race. This includes  
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comprehensive training for all faculty and staff, the establishment of a monitoring and reporting system for incidents of antisemitism, and the appointment of an independent ombudsperson to oversee compliance with these measures. Absent such relief, Plaintiff will suffer irreparable harm, as monetary damages alone are insufficient to remedy the ongoing threat to his rights and the rights of others similarly situated within the CSUN community.

113. Plaintiff requests that this Court issue a preliminary and permanent injunction prohibiting Defendants from engaging in any further discriminatory, retaliatory, or harassing conduct against Plaintiff or any other individual on the basis of religious creed, ancestry, and/or race.

114. Plaintiff further requests that this Court retain jurisdiction over this matter to ensure compliance with its orders and to protect Plaintiff's rights and the rights of all Jewish faculty and students at CSUN.

## **VII. PRAYER FOR RELIEF**

WHEREFORE, Plaintiff prays as follows:

1. For general, special, actual, compensatory and/or nominal damages, as against Defendants, in an amount to be determined at trial;
2. For a temporary restraining order, preliminary injunction, and permanent injunction;
3. For a Declaration that Defendants: (a) discriminated against Plaintiff; (b) failed to provide reasonable accommodations to Plaintiff; (c) failed to engage

1 in the good faith interactive process with Plaintiff; (d) retaliated against  
2 Plaintiff; (e) denied Plaintiff rights under the FEHA; and (f) failed to take  
3 adequate measures to prevent discrimination and retaliation from  
4 occurring;

- 5 4. For costs and expenses of this litigation, including expert fees and costs;  
6 5. For reasonable attorneys' fees;  
7 6. For pre and post-judgment interest on all damages and other relief awarded  
8 herein; and,  
9 7. For all such other relief as this Court deems just and appropriate.  
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12 **VIII. DEMAND FOR JURY TRIAL**

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14 Plaintiff hereby demands trial by jury in this action of all claims asserted  
15 against as permitted by law.  
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18  
19 Date: August 10, 2025

Respectfully submitted,

PETER LAW GROUP

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21  
22 By Arnold P. Peter  
23 Arnold P. Peter  
24 Eyal Farahan  
25 Attorneys for Plaintiff  
26 SAM LINGROSSO  
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# **EXHIBIT A**



## Civil Rights Department

651 Bannan Street, Suite 200 | Sacramento | CA | 95811  
1-800-884-1684 (voice) | 1-800-700-2320 (TTY) | California's Relay Service at 711  
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

May 20, 2025

Eyal Farahan  
270 Coral Circle  
El Segundo, CA 90245

RE: **Notice to Complainant's Attorney**  
CRD Matter Number: 202505-29474420  
Right to Sue: Lingrosso / TRUSTEES OF THE CALIFORNIA STATE  
UNIVERSITY et al.

Dear Eyal Farahan:

Attached is a copy of your complaint of discrimination filed with the Civil Rights Department (CRD) pursuant to the California Fair Employment and Housing Act, Government Code section 12900 et seq. Also attached is a copy of your Notice of Case Closure and Right to Sue.

**Pursuant to Government Code section 12962, CRD will not serve these documents on the employer.** You must serve the complaint separately, to all named respondents. Please refer to the attached Notice of Case Closure and Right to Sue for information regarding filing a private lawsuit in the State of California. A courtesy "Notice of Filing of Discrimination Complaint" is attached for your convenience.

Be advised that the CRD does not review or edit the complaint form to ensure that it meets procedural or statutory requirements.

Sincerely,

Civil Rights Department



## Civil Rights Department

651 Bannan Street, Suite 200 | Sacramento | CA | 95811  
1-800-884-1684 (voice) | 1-800-700-2320 (TTY) | California's Relay Service at 711  
[calcivilrights.ca.gov](http://calcivilrights.ca.gov) | [contact.center@calcivilrights.ca.gov](mailto:contact.center@calcivilrights.ca.gov)

May 20, 2025

**RE: Notice of Filing of Discrimination Complaint**

CRD Matter Number: 202505-29474420

Right to Sue: Lingrosso / TRUSTEES OF THE CALIFORNIA STATE  
UNIVERSITY et al.

To All Respondent(s):

Enclosed is a copy of a complaint of discrimination that has been filed with the Civil Rights Department (CRD) in accordance with Government Code section 12960. This constitutes service of the complaint pursuant to Government Code section 12962. The complainant has requested an authorization to file a lawsuit. A copy of the Notice of Case Closure and Right to Sue is enclosed for your records.

Please refer to the attached complaint for a list of all respondent(s) and their contact information.

No response to CRD is requested or required.

Sincerely,

Civil Rights Department





## Civil Rights Department

651 Bannan Street, Suite 200 | Sacramento | CA | 95811  
1-800-884-1684 (voice) | 1-800-700-2320 (TTY) | California's Relay Service at 711  
[calcivilrights.ca.gov](http://calcivilrights.ca.gov) | [contact.center@calcivilrights.ca.gov](mailto:contact.center@calcivilrights.ca.gov)

May 20, 2025

Sam Lingrosso  
270 Coral Circle  
El Segundo, CA 90245

RE: **Notice of Case Closure and Right to Sue**  
CRD Matter Number: 202505-29474420  
Right to Sue: Lingrosso / TRUSTEES OF THE CALIFORNIA STATE  
UNIVERSITY et al.

Dear Sam Lingrosso:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective May 20, 2025 because an immediate Right to Sue notice was requested.

This letter is also your Right to Sue notice. According to Government Code section 12965, subdivision (b), a civil action may be brought under the provisions of the Fair Employment and Housing Act against the person, employer, labor organization or employment agency named in the above-referenced complaint. The civil action must be filed within one year from the date of this letter.

After receiving a Right-to-Sue notice from CRD, you may have the right to file your complaint with a local government agency that enforces employment anti-discrimination laws if one exists in your area that is authorized to accept your complaint. If you decide to file with a local agency, you must file before the deadline for filing a lawsuit that is on your Right-to-Sue notice. Filing your complaint with a local agency does not prevent you from also filing a lawsuit in court.

To obtain a federal Right to Sue notice, you must contact the U.S. Equal Employment Opportunity Commission (EEOC) to file a complaint within 30 days of receipt of this CRD Notice of Case Closure or within 300 days of the alleged discriminatory act, whichever is earlier.

Sincerely,

Civil Rights Department

**COMPLAINT OF EMPLOYMENT DISCRIMINATION  
BEFORE THE STATE OF CALIFORNIA  
Civil Rights Department  
Under the California Fair Employment and Housing Act  
(Gov. Code, § 12900 et seq.)**

**In the Matter of the Complaint of**

Sam Lingrosso

CRD No. 202505-29474420

Complainant,

vs.

TRUSTEES OF THE CALIFORNIA STATE  
UNIVERSITY  
401 Golden Shore  
Long Beach, CA 90802

CHRISTINA L. VON MAYRHAUSER  
401 Golden Shore  
Long Beach, CA 90802

Respondents

1. Respondent **TRUSTEES OF THE CALIFORNIA STATE UNIVERSITY** is an **employer** subject to suit under the California Fair Employment and Housing Act (FEHA) (Gov. Code, § 12900 et seq.).

2. Complainant is naming **CHRISTINA L. VON MAYRHAUSER** individual as Co-Respondent(s).

3. Complainant **Sam Lingrosso**, resides in the City of **El Segundo**, State of **CA**.

4. Complainant alleges that on or about **May 19, 2025**, respondent took the following adverse actions:

**Complainant was harassed** because of complainant's religious creed - includes dress and grooming practices, association with a member of a protected class, race (includes hairstyle and hair texture).

**Complainant was discriminated against** because of complainant's ancestry, religious creed - includes dress and grooming practices, race (includes hairstyle and hair texture) and as a result of the discrimination was terminated, reprimanded, given additional work responsibilities or assignments.

**Complainant experienced retaliation** because complainant reported or resisted any form of discrimination or harassment and as a result was terminated, reprimanded, given additional work responsibilities or assignments.

**Additional Complaint Details:**

1 VERIFICATION

2 I, **Eyal Farahan**, am the **Attorney** in the above-entitled complaint. I have read the  
3 foregoing complaint and know the contents thereof. The matters alleged are based on  
4 information and belief, which I believe to be true. The matters alleged are based on  
information and belief, which I believe to be true.

5 On May 20, 2025, I declare under penalty of perjury under the laws of the State of  
6 California that the foregoing is true and correct.

7 **El Segundo, CA**

**PROOF OF SERVICE**

*Lingrosso v. Trustees Of The California State University, et. al.*

*Case Number: 25LBCV01519*

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES:

I am employed in the county of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 270 Coral Circle, El Segundo, California 90245.

On August 11, 2025, I served the foregoing document(s) described as

**FIRST AMENDED COMPLAINT FOR DAMAGES AND EQUITABLE RELIEF** on the interested parties in this action as follows:

Dennis Walsh <a href="mailto:dwalsh@walshlawyers.com">dwalsh@walshlawyers.com</a> <b>Walsh &amp; Associates, APC</b> 16633 Ventura Boulevard, Suite 800 Encino, CA 91463	Attorneys for Defendants
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[ X ] (By Electronic Service) Pursuant to agreement of the parties or court order, I caused a copy of the above-listed document(s) to be sent from e-mail address [aramirez@peterlawgroup.com](mailto:aramirez@peterlawgroup.com) to the person(s) at the e-mail address listed in the Service List, I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on August 11, 2025. at El Segundo, California.

*Andrea Ramirez*

Andrea Ramirez