

June 10, 2024

The Honorable Merrick B. Garland
Attorney General
Department of Justice
950 Pennsylvania Ave. N.W.
Washington, DC 20530

Dear Attorney General Garland:

On March 25, 2024, Zachor Legal Institute submitted a prosecution request (the “March 25 Request”) to the Department of Justice (“DOJ”) on behalf of 29 organizations concerned with antisemitism on American university campuses. That prosecution request can be found at <https://zachorlegal.org/wp-content/uploads/2024/03/ZLI-Coalition-Prosecution-Request-to-AG.pdf>.¹

Since the March 25 Request, the DOJ has apparently taken no action to address these matters and the situation on campuses has deteriorated.

The March 25 Request outlined how university campuses have become “no go” zones for Jewish students as a result of a coordinated campaign by Students for Justice in Palestine (“SJP”) and groups aligned with SJP to deprive Jewish students of their constitutional and federally protected rights. As the March 25 Request explained, “[t]he objectives of SJP’s campaign include preventing American Jews from exercising their First Amendment rights as well as their rights to participate in federally funded programs such as public education. Their tactics include brandishing weapons on campuses, physically attacking Jews and using large crowds to physically prevent Jews from attending classes or using campus facilities. This constitutes an organized deprivation of rights of Jewish Americans.”

While the March 25 Request used the events on the campus of the University of California, Los Angeles to illustrate the depth of the problem, a lawsuit on behalf of StandWithUs Center for Legal Justice and Jewish students at the Massachusetts Institute of Technology (“MIT”) was filed, as amended, in the Massachusetts District Court on May 17, 2024 (the “MIT Lawsuit”).²

¹ See Gabe Kaminsky, *Biden DOJ Asked to Prosecute Anti-Israel College Group over Harassment of Jewish Students*, WASH. EXAMINER (Mar. 27, 2024), available at <https://www.washingtonexaminer.com/news/justice/2940857/biden-doj-asked-to-prosecute-anti-israel-college-group-over-harassment-of-jewish-students/>.

² See <https://swulegaljustice.org/mit-lawsuit/>.

Because the MIT Lawsuit provides further details on how groups in addition to SJP are escalating their attacks on Jewish students and is based, in part, on the private analog to the federal criminals laws cited in the March 25 Letter (i.e., the “KKK Laws” at 18 U.S.C. §§ 241, 242 and 245), we now ask the DOJ to investigate and prosecute those groups cited herein under 18 U.S.C. §§ 241 and 245.³

Contents

Background.....	3
MIT Lawsuit.....	3
MIT Campus Groups	4
MIT Campus Groups’ Actions to Deprive Jewish Students of Constitutional and Federally Protected Rights	5
Application of the KKK Laws to the Acts of the MIT Campus Groups.....	8
18 U.S.C. § 241	8
18 U.S.C. § 245	9
Conclusion.....	11

³ Because MIT is not a public university, the applicability of 18 U.S.C. § 242, which requires action under “color of law”, is likely not applicable to this request, though we defer to the DOJ on whether to prosecute under 18 U.S.C. § 242 specifically.

Background

The March 25 Request included an extensive description of the activities of university groups that support the October 7, 2023 Hamas terror attack on Israel (the “October 7 Terror Attack”) to deprive Jewish students of rights as well as full overviews of the KKK Laws and how they apply to campus activities in support of the October 7 Terror Attack. We refer to the March 25 Request and incorporate it herein by reference rather than repeating the materials in this request.

Furthermore, while the hypothetical included in the March 25 Request remains relevant and applicable, since this request applies specifically to MIT and five campus groups identified below (the “MIT Campus Groups”) that are the parties depriving Jewish students at MIT of their constitutional and federally protected rights, this request will first outline the activities of the MIT Campus Groups with regard to deprivations of rights of Jewish students and then explain how the KKK Laws must be enforced against the MIT Campus Groups.

MIT Lawsuit

On March 7, 2024, the StandWithUs Center for Legal Justice and certain MIT students filed a federal lawsuit against MIT over the university’s condoning of antisemitism in violation of the students’ rights under Title VI of the Civil Rights Act.

The complaint (“FAC”), filed in Massachusetts District Court by several law firms, describes how MIT turned a blind eye to antisemitic activities on its campus, refused to enforce policies to protect Jewish and Israeli students and faculty, and has thereby created a hostile environment for Jews. Among other matters, the FAC details how “**Jewish and Israeli students were warned to avoid going to certain locations on campus during protests because of the hostile environment created by [the MIT Campus Groups].**”⁴

On May 17, 2024, the plaintiffs amended their lawsuit to incorporate a class count and a claim under 42 U.S.C. § 1986, for coordinated antisemitic actions which MIT enabled and which deprived Jewish and Israeli students of their constitutional rights. The MIT Lawsuit also set forth the manner in which the MIT Campus Groups violated 42 U.S.C. § 1985(3) but did not name the MIT Campus Groups as defendants.⁵ The FAC also detailed additional, egregious acts of discrimination, harassment, and intimidation that came to light after the initial lawsuit was filed on March 7, 2024. The discussion below of the identities and activities of the MIT Campus Groups is derived from the FAC.

⁴ FAC at 4 (emphasis added).

⁵ It must be noted that while this request, the March 25 Request and the MIT Lawsuit all refer to KKK Laws, there are two different sets of laws being discussed. 18 U.S.C. §§ 241, 242 and 245, which this request and the March 25 Request define as the KKK Laws, are criminal laws that can only be enforced by the DOJ. 42 U.S.C. §§ 1985 and 1986, which the MIT Lawsuit defines as KKK laws, are enforceable through private rights of action. Both sets of laws deal generally with conspiracies and the deprivation of constitutional and federal rights. Herein, unless otherwise indicated, references to the KKK Laws mean 18 U.S.C. §§ 241, 242 and 245 only.

MIT Campus Groups

The MIT Campus Groups consist of the following entities.

1. The MIT Coalition Against Apartheid (“MIT CAA”) is a recognized student group at MIT. Prior to the October 7 Terror Attack and dating back for years, MIT CAA has had a history of disrupting and opposing Jewish and pro-Israel events at MIT’s campus. By way of example, the group has held protests on Israeli Independence Day, has refused to participate in organized dialogue with Israeli and Jewish student leaders, has called for the opposition of “normalization with the Zionists,” and has hosted openly antisemitic speakers on campus. However, MIT CAA’s antisemitic activities escalated significantly after the October 7 Terror Attack. MIT CAA has openly endorsed the violent attacks against Jews and Israelis and has continued to call for the genocide of Jews and the elimination of Israel at official group functions on MIT’s campus. MIT CAA has been provisionally suspended as a recognized student group.
2. Palestine@MIT (“P@MIT”) is a recognized student group at MIT that often cooperates and collaborates with MIT CAA in creating a hostile environment for Jews on the campus of MIT.
3. Scientists Against Genocide Encampment (“SAGE”) is a project of, *inter alia*, MIT CAA. SAGE was created to establish an unapproved encampment on the MIT campus where much of the planning and implementation of the MIT Campus Groups’ activities aimed at depriving Jewish students of their rights on campus occurs. While not a recognized student organization, SAGE serves as the central point of organization for the MIT Campus Groups’ antisemitic activities and the encampment itself is the physical location from which much, though not all, of the deprivation of Jewish students’ rights originates.
4. The Graduate Student Union (“GSU”), also known as “United Electrical, Radio and Machine Workers of America Local 256”, is a labor organization comprised of graduate students at MIT. GSU affiliates and collaborates with MIT CAA, P@MIT and other student groups in antisemitic activities, include the establishment and continuing operations of the SAGE encampment.
5. The MIT Black Graduate Student Association (“BGSA”) is a graduate student organization for African American MIT students that affiliates and collaborates with MIT CAA, P@MIT, GSU and SAGE in the establishment and continuing operations of the SAGE encampment.

Each of the MIT Campus Groups works in coordination with SJP to deprive Jewish MIT students of their rights on campus⁶ and the FAC provide additional details on each of the MIT Campus groups at Section VIII of the Statement of Facts.

⁶ FAC at 94.

MIT Campus Groups' Actions to Deprive Jewish Students of Constitutional and Federally Protected Rights

As detailed in the FAC, the MIT Campus Groups "...prevented all students from moving freely throughout campus – including to and from classes and university sanctioned activities."⁷ By the nature of their unified agenda to interfere with the presence of Israeli and other Jewish students on campus, the MIT Campus Groups' actions affected Jewish/Israeli students more than any other campus constituency.⁸

While the MIT Campus Groups escalated their antisemitic activities in response to the October 7 Terror Attack, they also have a "...history of disrupting and opposing Jewish and pro-Israel events at MIT's campus."⁹ That pattern escalated dramatically after October 7, 2023.

For example, on October 17, 2023, one of the MIT Campus Groups distributed an email to all student groups claiming (falsely) that Israeli forces had massacred hundreds of Palestinian Arabs at a hospital in Gaza. This libel led to attacks on Jewish students on campus, going so far as to create "...such a hostile environment in a study group, that [Jewish students] felt they could no longer participate."¹⁰ The situation escalated when one of the MIT Campus Groups organized a rally on campus where "...Jewish students were harassed and assaulted", leading many Jewish MIT students "...to feel unsafe and unwelcome on campus."¹¹

A week later, the MIT Campus Groups escalated their attacks on Jewish students once again, where they led campus-wide disruptions targeting Jewish students. The MIT Campus Groups focused their attacks on an area of campus known as "Lobby 7", a "...major thoroughfare...through which many students often must travel to attend class or other on campus events."¹² The disruptions caused by the MIT Campus Groups had a particularly strong impact on Jewish students as there were large numbers of hostile MIT Campus Groups members shouting antisemitic slogans and displaying inciteful materials demonizing the Jewish homeland and Jews.¹³

Shortly after the campus-wide disruptions, the MIT Campus Groups focused their attacks, targeting the offices of Jewish professors and MIT's Israel internship office, resulting in

⁷ FAC at 6.

⁸ See the March 25 Request at pp. 5-8 for specific evidence that the focus of campus protests from and after the October 7 Terror Attack has been on Jewish students. As the March 25 Request details, campus protests of this nature have been organized and led by SJP and its affiliates. See, also, the complaint filed in Maya Parizer, et al., v. AJP Educational Foundation Inc. and National Students for Justice in Palestine, Case 1:24-cv-00724 (Eastern District of Virginia, Alexandria Division (May 1, 2024), available at https://www.gtlaw.com/en/-/media/files/news/press-releases/2024/national-jewish-advocacy-center-the-schoen-law-firm-and-the-holtzman-vogel-law-firm-vs.pdf?sc_lang=en&hash=B3D9D0E5C29A86D48411FFC49E7B2142 (alleging and detailing the coordination of various antisemitic campus groups on campuses across the country from and after the October 7 Terror Attack).

⁹ FAC at 34.

¹⁰ FAC at 44

¹¹ *Id.*

¹² *Id.* at 45.

¹³ *Id.*

individuals “...feeling alarmed, intimidated and even afraid...trapped in their offices, anxious about the prospect of verbal and/or physical assault.”¹⁴

MIT not only allowed these attacks on Jewish students and faculty, it emboldened the MIT Campus Groups by telling Jewish students that “...for their own safety they should stay away from their own campus.”¹⁵ The situation became so dire that MIT’s Hillel (the largest campus Jewish organization in the country) urged Jewish students at MIT to not be present anywhere near Lobby 7.¹⁶

It was not only Jewish groups that saw the extreme dangers to Jewish students as a result of the actions of the MIT Campus Groups; even MIT professors “...warned Jewish and Israeli students...to avoid the protests for fear of their safety.”¹⁷

In very real terms, the MIT Campus had become a “no-go” zone for Jewish students as a result of the unchecked threats and assaults of the MIT Campus Groups.¹⁸

While the foregoing may sound like a dramatization of campus events, a social media post from an MIT Professor provides a contemporaneous account of exactly what the MIT Campus Groups were doing on campus:

“Jewish and Israeli MIT students were physically prevented from attending a class by a hostile group of pro-Hamas and anti-Israel MIT students that call themselves the CAA. This is after students from the CAA harassed MIT staff members in their offices for being Jewish and interrupted classes in the past few weeks. All of this has occurred with no clear response from the administration. With each passing day, MIT admin’s silence makes Jewish and Israeli students feel unsafe at MIT. Many Jewish students fear leaving their dorm rooms and have stated that they feel MIT is not safe for Jews. This message is compounded by the public and private warnings of Hillel and many faculty that Jewish students should not enter MIT’s main lobby today, November 9th, 2023. Instead of dispersing the mob or de-escalating the situation by rerouting all students from Lobby 7, Jewish students specifically were warned not to enter MIT’s front entrance due to a risk to their physical safety. The onus to protect Jewish students should not be on the students themselves. MIT administration recently announced guidelines to avoid illegal and unsafe protests on campus. The CAA, which planned the protest, knowingly and proudly violated these requirements, and even invited people from outside of MIT to join them. Their actions inhibit the possibility of safe and peaceful dialogue and endanger Jewish students on campus. The CAA hosted a blockade that not only disregards MIT guidelines, but also obstructs Jewish students from attending classes. Some Jewish students who saw the administration’s failure to respond to the targeted harassment of Jews on campus by the CAA came together to support

¹⁴ *Id.* at 46.

¹⁵ *Id.* at 48.

¹⁶ *Id.*

¹⁷ *Id.* at 49.

¹⁸ Indeed, the FAC notes that “MIT professors, faculty and staff...harassed Jewish students.” FAC at 49.

each other and peacefully together stand against this threat to their safety. Four hours after the blockade started, at 12 pm, the MIT administration passed a letter to all students, threatening their suspension if the crowds did not disperse from Lobby 7. Only the Jewish students left immediately. The CAA protesters did not cooperate. Indeed, the CAA proceeded to invite more students and non-MIT protesters to join them in calling for a violent uprising (“Intifada”) and justifying the terror attacks of Hamas on Israeli civilians. At 5 pm, all students on campus were warned through MIT’s emergency notification system to “avoid Lobby 7” — officially recognizing the danger present to students as a result of this violent protest. No Jewish or Israeli students were present at this point. As of 10:30 tonight MIT has officially decided not to academically suspend CAA students who repeatedly violated the administration's guidelines and threats. They have shown that actions against Jews at MIT do not have consequences. Additionally, in an email to DUSP [Department of Urban Studies and Planning] students, the Department Head indicated that he would protect any DUSP students involved in violating MIT’s rules today by protesting with the CAA. Not only do Jewish students feel unsafe on campus, but now they also feel excluded from and unsafe in DUSP. Today, on the 9th of November, on the 85th anniversary of Kristallnacht, which marked the beginning of the Holocaust, Jews at MIT were told to enter campus from back entrances and not to stay in Hillel for fear of their physical safety. We are seeing history repeating itself and Jews on MIT’s campus are afraid.”¹⁹

In the following days and weeks, the MIT Campus Groups yet again escalated their attacks on Jewish students with blockades and antisemitic threats.²⁰ Jewish students were not only deprived of their rights to be a part of the campus community, Jewish professors were similarly under siege and one such professor resigned his position, stating that he was forced to take such dramatic action as a result of “...those who condemn my Jewish identity....”. This professor detailed what led up to his resignation, explaining “...nothing has hurt more than watching Israeli and Jewish students—who comprise fewer than 6 percent of the MIT student body—suffer [as a result of actions of the MIT Campus Groups.]”²¹

As mentioned earlier, the MIT Campus Groups strategically attacked public spaces on the campus of MIT so as to deprive Jewish students of safe access and presence on campus. The establishment of “encampments”, where the MIT Campus Groups violated MIT policies to occupy spaces meant for all students to assemble and block access to classrooms and other campus spaces, became the MIT Campus Groups’ most effective weapon. The encampment prevented Jewish students from attending a very important Jewish holiday event at the campus Hillel²² and the MIT Campus Groups subsequently physically blocked access to an area on campus where an event honoring Israel was to take place.²³

¹⁹ FAC at 50-51.

²⁰ *Id.* at 53.

²¹ *Id.* at 60-61.

²² *Id.* at 72 and 75.

²³ *Id.* at 75.

As the FAC states, the MIT Campus Groups engaged in their coordinated actions on campus to "...injure Jewish and Israeli members of the campus community by denying them the equal privileges and immunities of citizenship and the use, benefits and privileges of property and/or contractual relationships..." by "...plan[ning] and coordinat[ing] the rallies and protests [described in the FAC], encourage[ing] attendance, actively organiz[ing] followers to attend, coordinat[ing] logistical support to attendees, promot[ing] the rallies and encampments and encourage[ing] attendees to prepare for and commit discriminatory and harassing acts while concealing their identifies...[the MIT Campus Groups] repeatedly engaged in campaigns of intimidation, threats, and violence throughout MIT's campus."²⁴

These actions constitute a prima facie deprivation of Jewish students' rights to be on campus, engage in speech and assembly and to participate in federally funded educational programs at MIT. Under no recognized interpretation of the First Amendment is such deprivations of rights protected.

Application of the KKK Laws to the Acts of the MIT Campus Groups

The March 25 Request, which is incorporated herein by reference, contains a detailed discussion of the elements and applicability of the KKK Laws and those details will not be repeated in this request.

As mentioned above, because MIT is not a public university it is likely that there has been no action under color of law, so the discussion of 18 U.S.C. § 242, which requires action under color of law, will not be covered in this request (though we defer to the DOJ in the event it finds a sufficient showing of a nexus to government actors in the matters detailed both in this request as well as the MIT Lawsuit).

Consequently, this request will provide a general overview of the two provisions of the KKK Laws, 18 U.S.C. §§ 241 and 245, that are most applicable to the MIT Campus Groups and then explain how the actions of the MIT Campus Groups constitute violations of those particular KKK Laws.

The acts of the MIT Campus Groups, as summarized in the prior section of this request, are too numerous to set out *in toto* but several examples of specific conduct suffice to show violations of the KKK Laws.

18 U.S.C. § 241

In any prosecution under 18 U.S.C. §241, the following elements must be established:

- (1) That a conspiracy involving two or more people existed;

²⁴ *Id.* at 90. The FAC notes that the MIT Lawsuit does not name the MIT Campus Groups as defendants but it sets out the acts constituting a conspiracy to deprive rights by the MIT Campus Groups to establish the culpability of MIT for allowing and even facilitating the deprivation of rights. FAC at 89-93.

- (2) That the object of the conspiracy was to injure, oppress, threaten, or intimidate a person in the free exercise or enjoyment of a right protected by the Constitution or laws of the United States; and
- (3) That the defendants knowingly and voluntarily joined the conspiracy with an understanding of its purpose and unlawful nature.

As an example of a violation of 18 U.S.C. § 241 by the MIT Campus Groups, at the SAGE encampment, the co-President of MIT CAA targeted a Jewish student, denying her access to a public campus area while allowing all non-Jewish students entry to the area.²⁵ Moreover, the acts of the MIT Campus Groups to prevent Jewish students from attending a Jewish holiday event and the celebration of Israel on campus, as described herein, constitute further deprivations of rights.

The FAC provides a comprehensive review of incidents where the students, Jewish faculty and staff at MIT have suffered other deprivations of rights.

The deprivations of rights were not an unintentional byproduct of the MIT Campus Groups exercising their rights to peacefully assemble and protest; they were the goal of the MIT Campus Groups' acts.

In intentionally preventing Jewish students and MIT faculty/staff from exercising their rights to assemble, speak and avail themselves of the educational opportunities at MIT, the actions of the MIT Campus Groups clearly constitute a conspiracy to injure, oppress, threaten, and intimidate Jewish students and MIT staff and faculty²⁶ in the free exercise or enjoyment of rights protected by the First, Thirteenth and Fourteenth Amendments to the Constitution, Titles VI and VII of the Civil Rights Act and numerous other laws of the United States.

Again, because the MIT Campus Groups are so similar and, are in fact, affiliated with SJP, we refer to the March 25 Request at pages 21-23 for a detailed legal analysis of the specific application of 18 U.S.C. § 241 to the facts presented herein.

18 U.S.C. § 245

The relevant provisions of 18 U.S.C. § 245 in the context of the deprivation of rights by the MIT Campus Groups are 18 U.S.C. §§ (b)(1)(E) (the use or threat of force to intimidate or interfere with a person's right to participate in a federally funded program) and 18 U.S.C. § 245 (b)(2)(C) (interference with a person's employment by a private employer on the basis of the person's race, color, religion or national origin).

In any prosecution under 18 U.S.C. § 245, the following elements must be established:

²⁵ *Id.* at 96.

²⁶ Without question, non-Jewish students suffered similar deprivations, though the focus of the MIT Campus Groups was Jewish and Israeli students.

- (1) That the person used force or the threat of force;
- (2) That the person willfully injured, intimidated, or interfered with the victim, or attempted to do so;
- (3) That the person acted because of the victim's race, color, or national origin for 18 U.S.C. § 245 (b)(2)(C) prosecutions;
- (4) That the person acted because the victim was enjoying the goods, services or facilities of a place or activity referenced in the statute; and, if a felony is charged,
- (5) That bodily injury resulted. This is only for felony charges. For other charges, no bodily injury is required.

As a threshold matter, 18 U.S.C. § 245 requires a showing that there was a threat or use of force in the course of the deprivation of rights. Force is defined as “power, violence, compulsion, or restraint exerted upon or against a person or thing.” *United States v. McDermott*, 29 F.3d 404, 409 (8th Cir. 1994).

As the FAC documents, the MIT Campus Groups rely upon large numbers of participants to physically occupy spaces and intimidate Jewish students from exercising their rights.²⁷ In the case of the MIT Campus Groups, they used force as well as the threat of force in depriving Jewish students and faculty/staff of their rights. As the MIT Professor quoted above explicitly stated, “Jewish and Israeli MIT students were physically prevented from attending a class by a hostile group of pro-Hamas and anti-Israel MIT students that call themselves the CAA.”

This is a classic case of the use or threat of force and it’s not only prevalent on the MIT campus, but also happening on universities across the country.

The FAC documents that the acts of the MIT Campus Groups were intentional and willful and designed to prevent Jewish students from accessing areas of campus, attending classes, gathering on campus and speaking on campus. With regard to Jewish MIT faculty and staff, the acts of the MIT Campus Groups were also intentional, willful and designed to compel the individuals from performing their respective job duties.

In the cases of affected faculty/staff, the MIT Campus Groups specifically targeted Jews as well as Israelis, satisfying 18 U.S.C. § 245’s requirement that the deprivation of rights relating to private employment be based on the affected person’s religion or national origin.

While MIT is a private university, it receives federal funding.

Thus, the actions of the MIT Campus Groups to deprive (i) Jewish students of their right to participate in the federally funded educational opportunities at MIT in violation of 18 U.S.C. §

²⁷ See, e.g., FAC at 111-115.

241 and (ii) Jewish and Israeli faculty and staff of their rights to employment constitute clear violations of 18 U.S.C. § 245.

In terms of whether the charges against the various members and affiliates of the MIT Campus Groups should be misdemeanor or felony charges, each case will obviously dictate the decision.

It must be noted, however, the when the DOJ makes this determination, the established standard for ascertaining whether “bodily injury” has resulted is “... any injury to the body, no matter how minor or temporary, including pure physical pain.” *Hudson v. McMillian*, 503 U.S. 1, 5 (1992); *see also United States v. Perkins*, 132 F.3d 1324, 1326 (10th Cir. 1997) (holding that an injury that is painful or obvious, or is of a type for which medical attention ordinarily would be sought, is “significant” bodily injury); and *United States v. Myers*, 972 F.2d 1566, 1572 (11th Cir. 1992) (approving instruction defining bodily injury as “any injury to the body, no matter how temporary” including “physical pain as well as any burn or abrasion”).

Given the extreme and pervasive nature of the MIT Campus Groups’ deprivations of rights the DOJ must ensure that where felony charges are legally permissible, the weight of the overall harm requires that they be brought.

Conclusion

Since the date of the March 25 Request there has been no publicly announced action by the DOJ to enforce the same laws that have been used recently to prosecute those who have interfered with the operations of abortion clinics.

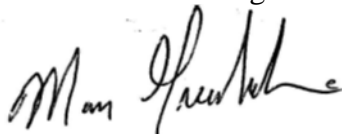
For example, on January 30, 2024, the Department of Justice announced the successful prosecution of individuals blocking access to abortion clinics. That prosecution included charges against protesters who prevented individuals from using the services of the abortion clinic in violation of Section 241 of the Deprivation of Rights Laws.²⁸

The threats posed by the MIT Campus Groups are far greater than obstruction of access to abortion clinics, yet the DOJ does nothing to protect MIT’s Jewish students, faculty and staff, notwithstanding exhaustive evidence that the MIT Campus Groups are blatantly depriving individuals and groups of constitutional and federally protected rights.

History has shown the results of government inaction in the face of rampant antisemitism. We are now living in a historical moment where the DOJ can take decisive action, using existing laws, to protect one of the most vulnerable groups in the country. It is critical that the DOJ act now and enforce the KKK Laws against the MIT Campus Groups.

²⁸ See <https://www.justice.gov/opa/pr/six-defendants-convicted-federal-civil-rights-conspiracy-and-freedom-access-clinic-entrances>. The defendants were convicted of violations of 18 U.S.C. § 241 as well as the FACE Act, 18 U.S.C. Section 248(a)(1) *et seq.*

On behalf of Zachor Legal Institute,

A handwritten signature in black ink, appearing to read "Marc Greendorfer". The signature is fluid and cursive, with the first name "Marc" written in a larger, more prominent script than the last name "Greendorfer".

Marc Greendorfer
President