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October 17, 2016

Via email: [REDACTED]

Mr. Robert Gardner
Political Science Student
University of California at Los Angeles

Re: Defamatory statements regarding David Horowitz

Dear Mr. Gardner:

This firm represents the David Horowitz Freedom Center ("David Horowitz") regarding the malicious and defamatory claims you have made about David Horowitz in your October 11, 2016 article in the UCLA university newspaper, the *Daily Bruin*, entitled "Submission: SJP unfazed by hate posters, will continue to educate students." Your article falsely labels David Horowitz's speech as "hate" speech based on unsubstantiated claims that David Horowitz is a racist. You falsely claim that David Horowitz is:

"... anti-Muslim ..."
"... anti-black ..." and a
"... hate organization ..."

There is not a shred of truth to these defamatory accusations. Although David Horowitz has written and published over a million words, there is not a single sentence that could qualify as "anti-Muslim" or "anti-black". Nor do you quote any. In fact, David Horowitz has said publicly and in print that the majority of Muslims are good, law-abiding people. Yet you falsely describe David Horowitz as a racist. You should have checked the facts more carefully before printing your Op-Ed.

You are unable to cite any credible source showing that David Horowitz is racist, anti-Muslim, or anti-black. David Horowitz's work embodies support for equal rights for all races -- and the conviction that most Muslims are law-abiding, decent people. David Horowitz has in fact organized protests on more than 100 college campuses against the oppression of Muslim women, has published booklets against the oppression of Muslim women, and has sponsored panels with Muslim speakers against the oppression of Muslim women. There are numerous videos of campus speeches on the Internet where David Horowitz can be seen saying that such efforts are not directed against all Muslims, but are conducted on behalf of most Muslims against the hijacking of their religion by totalitarian radicals who are conducting a campaign of hatred against Jews, women, gays, and other minority groups.

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Mr. ~~Robert Gardner~~ ^{ATTORNEYS AT LAW}

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Very few people have done as much as David Horowitz to expose the ongoing oppression of Muslim women, Jews, gays, and other minorities in Middle Eastern countries, which should have been self-evident to you from recent news stories demonstrating large-scale murder and repression of Muslims by ISIS in Syria and Iraq. David Horowitz's research and exposure of the abuse of minority groups at the hands of extremist elements in Muslim countries should be a legitimate part of any dialogue on a university campus concerned with Middle East conflicts. Your ignorance of David Horowitz's long history of work on behalf of persecuted minorities reveals your own hypocritical betrayal of such minorities' rights. Indeed, your criticism of David Horowitz is positively Orwellian in nature and your shameful silence in the face of large-scale repression of Muslim women, Jews, gays, and other minorities in such countries suggests your tacit approval of such abuses.

Accordingly, David Horowitz demands that you immediately apologize and retract your defamatory statements and remove from the website article your statements that David Horowitz is anti-Muslim and anti-black. David Horowitz assumes you have an interest in the truth, and respect for the nation's libel laws.

Although David Horowitz would prefer to resolve this matter on an amicable basis, we reserve the right to exercise all available civil remedies to limit any damage to the reputation of David Horowitz resulting from your continuing violations. Further publication or republication of such pernicious falsehoods will also demonstrate your malicious intent and will support the imposition of punitive damages against you personally.

Sincerely yours,

GREENWALD & HOFFMAN, LLP



Paul A. Hoffman

Individual Rights Foundation affiliate counsel

Encl.: Daily Bruin article, "Submission: SJP unfazed by hate posters, will continue to educate students," dated 10/11/16

cc: Mr. David Horowitz
Manuel Klausner, Esq.

DAILY BRUIN

Friday, October 14, 2016

Submission: SJP unfazed by hate posters, will continue to educate students

BY ROBERT GARDNER

Posted: October 11, 2016 10:48 pm

The David Horowitz Freedom Center plastered derogatory posters on and around campus Oct. 5 in an attempt to suppress student activism for Palestinian human rights and scare potential supporters. The posters implicated Students for Justice in Palestine as a pro-terrorist, anti-Jewish organization that acts as a recruiting tool for future terrorists in the Middle East. It should be noted the Southern Poverty Law Center has documented the Freedom Center as an anti-Muslim, anti-immigrant and anti-black hate organization.

But despite their hateful views and tactics, the Freedom Center is no pariah. As reported by the Los Angeles Times, the Maccabee Task Force, a new Israel advocacy group with a budget of at least \$50 million, provided funding to the Freedom Center. The funding of such an organization, along with social media campaigns and subsidized trips to Israel, is part of the overall strategy led by Sheldon Adelson – a right-wing Las Vegas casino tycoon – to foster a positive image of Israel on US colleges campuses. The Freedom Center and the Maccabee Task Force are part of a larger cohort of Israel advocacy groups that are trying to suppress student activism for Palestinian human rights.

The Maccabee-funded Freedom Center has, in the past, displayed hate posters against Palestinian human rights activists. But during spring 2016, the Freedom Center escalated its campaign of intimidation by naming students individually, implicating them as anti-Semitic terrorists and murderers. As a result, students have reported feeling unsafe on campus. And now the Freedom Center, with its most recent campaign, shows no signs of stopping.

For Palestinian students and allies like myself, the experience has been all too surreal. Because of my activism for Palestinian human rights, I have been placed on an online blacklist – an

anonymous website ran by students and “concerned citizens” – that is trying to prevent me from being employed, and that blacklist provides the Freedom Center with the information needed to launch its hateful campaign of intimidation. Ever since my name was listed on the posters, I have been followed, bullied and harassed on social media. Like other students, this has caused me to worry for my safety. This experience has also caused me a great deal of psychological trauma, and I worry about my well-being.

However, campaigns of intimidation by outside Israel advocacy groups are no surprise. Because of the work SJP does, the student body is becoming conscious of Israel’s oppressive policies that deny Palestinian freedom. That is why – with the support of adiverse array of individuals and student organizations – UCLA’s student governing body voted in 2014 to divest from corporations that profit from Israel’s racist colonial network and violence that violate Palestinian human rights. Now, we will amplify our call to the University of California Board of Regents to hold true to its commitments of socially responsible investments and obey the nearly unanimous call by its undergraduate campuses to divest our tuition dollars from corporations that profit from the human rights abuses inflicted upon the Palestinian people.

Israel advocacy groups that protect those abusive policies are in a panic. So they’re descending onto campus in an attempt to inject fear and stop our activism.

But Palestinian students and allies will not be silenced by hate organizations like the Freedom Center, nor will we be silenced by multimillion-dollar Israel advocacy groups like the Maccabee Task Force that fund them. We will never terminate our quest for Palestinian freedom, and we urge the campus community to stand in solidarity with SJP and our fight for human rights, equality and justice for the Palestinian people.

Despite hateful and intimidating campaigns to suppress us, we will continue to educate the campus community and demand our tuition dollars be divested from corporations that profit from abuse of human rights in Palestine. Our support on campus is strong and only growing. As for students who know nothing about the struggle for Palestinian freedom, we urge them to attend our future meetings and events to learn about Palestine and what they can do to achieve human rights. Together, we will prevail in the face of hate and intimidation.

Robert Gardner is a fourth-year political science student.



Robert Gardner

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