IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

DANIEL FAORO,

Plaintiff,

No. -cv-

v.

JEWISH VOICE FOR PEACE, INC.
D/B/A OCCUPATION FREE DC, DISSENTERS,
PALESTINIAN YOUTH MOVEMENT A PROJECT OF
WESPAC FOUNDATION, INC., WESPAC
FOUNDATION, INC., HARRIET'S WILDEST
DREAMS, INC., DORNETHIA "NEE NEE" TAYLOR,
PARTY OF SOCIALISM & LIBERATION, BRIAN
BECKER, MARYLAND 2 PALESTINE, HANNAH
SHRAIM, AND 23 JOHN AND JANE DOES

DECLARATION OF NEVILLE HEDLEY

Defendants.

- I, Neville S. Hedley, declare as follows:
- 1. I have personal knowledge of the facts set forth herein and that the Exhibits to this Declaration are true and accurate copies of internet sites and social media accounts that I personally accessed and viewed, and, if called as a witness, could and would testify competently thereto.
- 2. My full legal name is Neville Spencer Hedley. I reside in North Carolina and my business address is Hamilton Lincoln Law Institute, 1629 K Street, NW, Suite 300, Washington, DC, 20006. My email address is ned.hedley@hlli.org.

BACKGROUND ON BLOCKADE ORGANIZERS

3. On or about March 1, 2024, I searched the Internal Revenue Service website, www.IRS.gov, which contains an Exempt Organization Business Master File Extract (EO BMF); <a href="www.IRS.gov/charities-non-profits/exempt-organizations-business-master-file-"www.IRS.gov/charities-non-profits/exempt-organizations-business-master-file-"www.IRS.gov/charities-non-profits/exempt-organizations-business-master-file-"www.IRS.gov/charities-non-profits/exempt-organizations-business-master-file-"www.IRS.gov/charities-non-profits/exempt-organizations-business-master-file-"www.IRS.gov/charities-non-profits/exempt-organizations-business-master-file-"www.IRS.gov/charities-non-profits/exempt-organizations-business-master-file-"www.IRS.gov/charities-non-profits/exempt-organizations-business-master-file-"www.IRS.gov/charities-non-profits/exempt-organizations-business-master-file-"www.IRS.gov/charities-non-profits/exempt-organizations-business-master-file-"www.IRS.gov/charities-non-profits/exempt-organizations-business-master-file-"www.IRS.gov/charities-non-profits/exempt-organizations-business-master-file-"www.IRS.gov/charities-non-profits/exempt-organizations-business-master-file-"www.IRS.gov/charities-non-profits/exempt-organizations-business-master-file-"www.IRS.gov/charities-non-profits/exempt-organizations-business-master-file-"www.IRS.gov/charities-non-profits/exempt-organizations-www.IRS.gov/charities-non-profits/exempt-organizations-www.IRS.gov/charities-non-profits/exempt-organizations-www.IRS.gov/charities-non-profits/exempt-organizations-www.IRS.gov/charities-non-profits/exempt-organizations-www.IRS.gov/charities-non-profits/exempt-organizations-www.IRS.gov/charities-non-profits/exempt-organizations-www.IRS.gov/charities-non-profits/exempt-organizations-www.IRS.gov/charities-non-profits/exempt-organizations-www.IRS.gov/charities-non-profits/exempt-organizations-www.IRS.gov/charities-non-profits/exempt-organizations-www.IRS.gov/charities-non-profits/exempt-organizations-www.IRS.gov/charities-non-p

<u>extract-eo-bmf</u>. The file "provides information about an organization from the Internal Revenue Service's Business Master File." This list functions as a Tax-Exempt Organization Search tool.

- 4. The tax-exempt organization list is broken out by state and by region. The regions are: Region 1 Northeast area; Region 2, mid-Atlantic and Great Lakes area; Region 3, Gulf Coast and Pacific Coast areas; and Region 4, including International areas and Puerto Rico.
- 5. States and Regions are determined by the filing address and represent the location of an organization's headquarters. The records are also sorted by the Employee Identification Number (EIN).
- 6. The version of the Tax Exempt Organization Search tool I reviewed noted that it had been updated on February 13, 2024.
- 7. Each State or Region exempt organization list can be downloaded into an Excel spreadsheet from the tool on the IRS website.
- 8. The IRS website also has a Tax Exempt Organization search feature, www.apps.irs.gov/app/eos/, which allows individuals to search for exempt organizations and access relevant information like determination letters or filings of IRS Form 990s. On September 9, 2024, I accessed this site and performed a search for the organizations and entities referenced in the complaint accompanying this declaration.
- 9. The Internal Revenue Service permits organizations that are tax-exempt under Internal Revenue Code (I.R.C.) Section 501(c)(3) to sponsor other organizations, entities or programs that are not formal nonprofit entities. It is a contractual relationship between the sponsoring tax-exempt organization and the entity being sponsored, thereby allowing that entity to attract tax-deductible funding without having to formally become a tax-exempt organization. The sponsoring entity maintains control over the donated funds, but such funds are restricted and dedicated to furthering the sponsored entity's purpose and

goals. *See* Gene Takagi, *Fiscal Sponsorship: A Balanced Overview*, Nonprofit Quarterly (Jan. 28, 2020) (attached as Exhibit 1).

- 10. Based on internet searches and media reports, I determined that there were six organizations that had organized an action on February 1, 2024 in Washington, D.C. to protest the armed conflict between Israel and Palestinians in the Gaza Strip. The six entities or organizations that sponsored the action were: Occupation Free DC; the Palestinian Youth Movement (PYM); Harriet's Wildest Dreams (HWD); Dissenters DMV; the Party for Socialism and Liberation (PSL); and Maryland2Palestine (MD2Palestine). www.instagram.com/p/C2h-zjauR9t/?img_index=1 (Exhibit 2)
- 11. Palestinian Youth Movement (PYM) maintains a website, www.palestinianyouthmovement.com. The website describes PYM as "a transnational, independent, grassroots movement of young Palestinians in Palestine and in exile worldwide as a result of the ongoing Zionist colonization and occupation of our homeland." (Exhibit 3)
- 12. PYM maintains an account on the social media platform X (formerly known as Twitter), www.X.com/palyouthmvmt, with a username of @palyouthmvmt. It also maintains an Instagram account, www.instagram.com/palestinianyouthmovement, with a username of @palyothmvmt, and a username of @palyouthmvmt. The PYM website has icons that link directly to these respective social media accounts.
- 13. PYM's website notes that it has 14 chapters across North America. One of those chapters is in Washington, D.C., which has its own Instagram account, www.instagram.com/dmvpym/, with a username of @dmvpym.
- 14. PYM is unincorporated and is not listed as a 501(c)(3) entity with the IRS. The PYM website has a stating its vision and what it does. page www.palestinianyouthmovement.com/about (Exhibit 4) The web page notes that PYM has a National Executive Board and lists emails to contact board members, but the email

addresses are generic emails with no individual names. For instance, the email for the General Coordinator is gc@pymusa.com.

- 15. On PYM's homepage of its website there is a tab marked "Donate." During the relevant time, clicking the donate icon would direct a person to a webpage hosted by goodbricks.org. This page allowed individuals to make online donations that purport to be tax deductible. The bottom of the page contained text stating "All donations are tax deductible. You will receive a follow-up email with the relevant info. We also accept checks payable to 'WESPAC Foundation' and mailed to 77 Tarrytown Rd, Suite 2W, White Plains NY 10607. Please indicate 'PYM' in the memo line." (Exhibit 5)
- 16. WESPAC Foundation maintains a website, www.wespac.org. WESPAC Foundation describes itself as "a leading force for progressive social change in Westchester County, New York since 1974" and that it has "been educating, agitating and organizing for a more just and peaceful world, an end to militarism and racism and a more fair economy that works for all." The bottom of the webpage lists the address of the WESPAC Foundation as 77 Tarrytown Rd., White Plains, NY 10607. (Exhibit 6)
- 17. A search for WESPAC Foundation on the exempt organization list for New York State shows that WESPAC Foundation, Inc., is an exempt organization under I.R.C. Section 501(c)(3), and the address on file with the IRS is 77 Tarrytown Road, Suite 2W, White Plains, NY 10607.
- 18. During the relevant time, PYM was a project of WESPAC Foundation and WESPAC acted as the fiscal sponsor and the formal legal entity to accept tax-exempt donations for PYM pursuant to I.R.C. Section 501(c)(3). WESPAC also acted as the fiscal sponsor for similar organizations such as National Students for Justice in Palestine (NSJP) and US Palestinian Community Network (USPCN).
- 19. Sometime after April 22, 2024, PYM altered the donation page on its website which reflects a new fiscal sponsor, Honor the Earth, which according to information on file with the IRS, is a 501(c)(3) exempt organization with an address of 607 Main Avenue,

Calloway, MN 56521. The revised PYM donation page still links to goodbricks.org, and notes that paper checks should be made "payable to 'Honor the Earth' and mailed to 1430 Haines Ave STE 108 #225, Rapid City, SD, 57701." www.goodbricks.org/cause/palestinianyouthmovement.com/donate-pym (Exhibit 7). This is the same address listed on the bottom of Honor the Earth's website. www.honorearth.org (Exhibit 8)

- Zahran Nasr; www.honorearth.org/board. (Exhibit 9) Nasr's biography notes that she lives in Austin, Texas and "currently serves as a lead organizer with Palestinian Youth Movement." (Exhibit 10) On information and belief, Nasr is also known as Courtney Lenna Schirf and Lenna Schirf, who has a LinkedIn profile under the name Lenna Schirf and indicates that she lives in Austin, Texas, www.linkedin.com/in/clschirf/. (Exhibit 11) Schirf, aka Nasr, was named as a defendant in the case Helman et al. v. Codepink Women for Peace, et al., No. 24-cv-5704 (C.D. Cal., Dkt. 18, Aug. 16, 2024), which alleges that Schirf, in her capacity as a leader for PYM, was involved in a violent protest outside a synagogue in Las Angeles, California which violated the FACE Act, 18 U.S.C. § 248(a)(2).
- 21. Occupation Free DC maintains a website, www.occupationfreedc.org. The website states that the campaign "aims to end DC Metropolitan Police Department (MPD) participation in US-Israeli 'counter-terrorism' police exchanges." Occupation Free DC maintains an account at X, www.twitter.com/OFDC Campaign, with a username of @occupationfreedc. The occupationfreedc.org website has icons that link directly to these social media accounts. (Exhibit 12)
- 22. The website indicates that Occupation Free DC is a campaign from Jewish Voice for Peace DC Metro chapter and Deadly Exchange. (Exhibit 12)
- 23. Jewish Voice for Peace DC Metro maintains a webpage, www.jvpdc.org, and has an account on X, www.X.com/JVPDCMetro, with a username of @JVPDCMetro, and an

account on Instagram, www.instagram.com/JVPDCMetro, with a username of @jvpdcmetro. The jvpdc.org website has icons that link directly to these respective social media accounts. (Exhibit 13)

- 24. Deadly Exchange maintains a website, <u>www.deadlyexchange.org</u>, which states that it is aimed at "Ending US-Israel Police Partnerships, Reclaiming Safety." The bottom of the webpage lists Jewish Voice for Peace, with an email contact of <u>Info@Jvp.Org</u>, and an address of P.O. Box 589, Berkley, CA 94701. (Exhibit 14)
- 25. Jewish Voice for Peace (JVP) maintains a website, www.jewishvoiceforpeace.org, where it describes itself as "the largest progressive Jewish anti-Zionist organization in the world." The address at the bottom of the webpage is the same as the address on the Deadly Exchange website. (Exhibit 15)
- 26. JVP maintains an account on X, www.X.com/jvplive, with a username of @jvplive, and an account on Instagram, www.instagram.com/jewishvoiceforpeace/, with a username of @jewishvoiceforpeace. The JVP website has icons that link directly to these two social media accounts. (Exhibit 15)
- 27. The Occupation Free DC website includes a tab to make a donation. The tab links to a secure donation page, secure.everyaction.com/YqgJbK02t0iuMJwSxsYc A2, from which to donate to the DC Metro Chapter of a Jewish Voice for Peace. The bottom of the page notes that those who wish to donate by check should mail checks to P.O. Box 589, Berkeley, CA 94701. This is the same address listed on JVP's website and on the Deadly Exchange website. (Exhibit 16)
- 28. A search for JVP on the California Secretary of State's website lists an address for JVP of 2342 Shattuck Avenue, #321, Berkeley, California 94704, and a registered agent of Registered Agents, Inc.
- 29. Dissenters maintains a website, <u>www.wearedissenters.org</u>, and describes itself as "leading a new generation of young people to reclaim our resources from the war

industry, reinvest in life-giving services, and repair collaborative relationships with the earth and people around the world." (Exhibit 17)

- 30. Dissenters maintains an account on X, www.X.com/wearedissenters, with a of @wearedissenters, and also username has an Instagram account, www.instagram.com/wearedissenters/, with a username @wearedissenters. The wearedissenters.org website has icons that link directly to these two social media accounts. (Exhibit 17)
- 31. Dissenters has a chapter in the D.C. metro area which maintains an Instagram account, www.instagram.com/dmvdissenters/, with a username @dmvdissenters.
- 32. Dissenters is an Illinois corporation. A search for Dissenters on the exempt organization list for Region 2 shows that Dissenters is an exempt organization under I.R.C. Section 501(c)(3), and the address on file with the IRS is 637 South Dearborn Avenue, Chicago, Illinois, 60505.
- 33. Harriet's Wildest Dreams (HWD) is a Maryland corporation and maintains a website, www.harrietsdreams.org, describing itself as "a Black-led community defense hub" dedicated to the abolition of prisons and policing. HWD maintains an account on X, www.X.com/harrietsdreams, with a username @HarrietsDreams, and an Instagram account, www.instagram.com/harrietsdreams, with a username @harreitsdreams. The HWD website has icons that link directly to these social media accounts. The bottom of the HWD webpage lists an address of 6368 Coventry Way, Suite 313, Clinton, Maryland, 20735. (Exhibit 18)
- 34. A search for Harriet's Wildest Dreams on the exempt organization list for the state of Maryland shows that Harriet's Wildest Dreams, Inc., is an exempt organization under I.R.C. Section 501(c)(3), and the address on file with the IRS is 6368 Coventry Way, Suite 313, Clinton, Maryland, 20735-2256.
- 35. The HWD website has a page that lists the staff members. Nee Nee Taylor is listed as a Co-founder and Executive Director. On information and belief, Taylor has an account on Instagram, www.instagram.com/neeneetay/, with a username @NeeNeeTay,

and the account page notes that she is Executive Director of HWD. The Maryland Secretary of State's office indicates that Dornethia Taylor is the president and registered agent for HWD and lists the address in ¶ 33 as the address for the registered agent. On information and belief, Dornethia Taylor and Nee Nee Taylor are the same person. (Exhibit 19)

- 36. The Party for Socialism and Liberation (PS&L) maintains a website, www.pslweb.org. The homepage includes a link to a webpage that lists PSL branches across the United States, including a branch in Washington, D.C. that lists a phone number, 202-234-2828, as a contact.
- 37. PS&L publishes Liberation News, the newspaper of the PS&L, and which has a website www.liberationnews.org. Brian Becker is a writer for Liberation News which describes him as a "founder of and a central organizer for the Party for Socialism and Liberation." (Exhibit 20) He is also National Coordinator of the ANSWER Coalition and in that role, he was identified as the Person In Charge for a Public Gathering Permit issued by the National Park Service for a protest on July 24, 2024 at Union Station in the District to protest the speech by Israeli President Benjamin Netanyahu before the United States Congress. (Exhibit 21) The address listed on the permit application is 617 Florida Avenue, NW, Washington, DC 20001, which is also the address listed as the National Office for the ANSWER Coalition on its website, www.answercoalition.org/contact_us.
- 38. PS&L maintains an X account, www.X.com/pslnational, with a username @pslnational, as well as an Instagram account, www.instagram.com/pslnational, with a username @pslnational. The PS&L website has icons that link directly to these two social media accounts. (Exhibit 22) The DC branch maintains an Instagram account, www.instagram.com/psldc/, with a username @psldc.
- 39. The PSL website also includes a link to make donations, www2.pslweb.org/donate. Prospective donors who would rather write a check rather than make an online donation are directed to mail checks to "Liberation News, 3041 Mission St., #151, San Francisco, CA 94110. (Exhibit 23)

- 40. A search of the IRS's database of exempt organizations and a search of the IRS's database of political organizations, www.forms.irs.gov/app/pod/basicSearch/search failed to turn up any records of filings with IRS. A search for PS&L at the website of the Federal Elections Commission, www.fec.gov/data/browse-data/?tab=filings, shows that the last filing for the PS&L was for the Presidential election of 2016.
- 41. Maryland2Palestine (MD2Palestine) maintains a website, www.md2palestine.com, and describes itself as "a grassroots Palestinian-led organization in the DMV building towards a free Palestine." MD2Palestine has an X account, www.X.com/md2palestine, with a username of @md2palestine, and an Instagram account, www.instagram.com/md2palestine, with a username of @md2palestine. It also maintains a Facebook account, www.facebook.com/MD2Palestine. The MD2Palestine website has icons that link directly to these social media accounts. The MD2Palestine website does not list any address or any other form of contact information. (Exhibit 24)
- 42. Searches of the IRS exempt organization lists for the State of Maryland and Region 1 and the exempt organization search website does not include any reference to an organization with the name Maryland2Palestine or MD2Palestine. The WHOIS information for the site indicates a private registration (no information about the site's owner).
- 43. Hannah Shraim is the co-chair of MD2Palestine, as reflected by an Instagram post, www.instagram.com/p/Cr6DuSwtMv8/. (Exhibit 25) She has an Instagram account with a username of @falastinnah which notes that she is an organizer for @md2palestine. www.instagram.com/falastinnah/ (Exhibit 26) Shraim has published posts on Instagram that reference @md2palestine and joint posts to both her and the @md2palestine Instagram account, several of which highlight her as the featured speaker at protests or rallies sponsored by MD2Palestine. (Exhibit 27) In March 2023, Shraim represented MD2Palestine at a forum at the University of Maryland, the college from which she graduated, to discuss Palestinian advocacy. MD2Palestine profiled this event on its Facebook page. (Exhibit 28)

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- 44. JVP's website includes a page dedicated to an action organized by JVP to shut York City down Grand Central Station in New on October 27. 2023; www.jewishvoiceforpeace.org/2023/10/30/wire-grand-centralaction/. The page highlights that the group "shut down Grand Central Station" during a Friday rush hour, completing shutting down the station. The page also notes that over 350 people were arrested.
- 45. JVP's website also includes a page highlighting that JVP organized actions in eight different cities where activists shut down eight bridges traffic: www.jewishvoiceforpeace.org/2023/12/18/wire-8-bridges/. The actions coincided with the eighth night of Hanukkah and noted that thousands of activists blocked traffic in Philadelphia, Washington, D.C., Atlanta, Chicago, Minneapolis, Seattle, Portland, Los Angeles, and San Diego.
- 46. At least four of the defendants, PYM, JVP (via OccupationFreeDC), PS&L, and MD2Palestine appear to have organized and promoted a similar blockade on the George Washington Parkway near Reagan National Airport on January 13, 2024. In that action, the activists used a convoy of cars flying Palestinian flags to impede and severely slow traffic on the Parkway approaching the airport. The defendants proudly publicized the action on social media accounts. (Exhibit 29.)

EVIDENCE OF CONSPIRACY

- 47. On January 25, 2024, the Instagram account @dmvpym, in collaboration with @occupationfreedc, @palestinianyouthmovement, @md2palestine, @harrietsdreams, and @psldc, posted flyers and notices regarding the scheduled February 1, 2024, action at 7:00 a.m. at Union Station. The flyer noted that the organizers of the action were: PYM, DMV Dissenters, HWD, Occupation Free DC, PSL and MD2Palestine, www.instagram.com/p/C2h-zjauR9t/. (Exhibit 2)
- 48. On January 25, 2024, @dmvdissenters and @wearedissenters posted a similar flyer but with a caption reading "GENERAL STRIKE FOR PALESTINE NO WORK NO SCHOOL

NO SHOPPING" and noted the date, time and location of the action as 7 am February 1 at Union Station. The flyer listed the six entities organizing the action and included text stating "In ONE WEEK, join DMV Dissenters @dmvpym @occupationfreedc @harrietsdreams @md2palestine and @psldc for a rally for Palestine at Union Station to disrupt business as usual in the heart of U.S. empire." www.instagram.com/p/C2i[BRYRxWd/ (Exhibit 30.)

- 49. The organizers' six Instagram accounts published a post on January 27, 2024 with a headline stating "IN 5 DAYS DC WILL SHUT IT DOWN FOR PALESTINE" and noted time and location as 7:00 am at Union Station. (Exhibit 31.)
- 50. On January 29, 2024, @dmvpym, in collaboration with @dmvdissenters, @occupationfreedc, @palestinianyouthmovement, and @psldc, posted on their Instagram accounts a similar notice regarding the February 1, 2024 action at Union Station. This post included 8 slides stating that the action would be in three days and noting the time and location. The remaining slides set out a list of demands by the activists. www.instagram.com/p/C2sqWDPx3nq??img_index=1 (Exhibit 32.)
- 51. On January 30, 2024, the Instagram accounts @harrietsdreams and @neeneetay posted a video that included the flyer publicizing the action at Union Station on February 1 at 7:00 am and listing the six organizations sponsoring the action. Text accompanying the posted video stating "@harrietsdreams is asking all our followers to join us in solidarity with our Palestinian comrades to demand a Cease Fire Now on Thursday, 7 am! Meet us at Union Station." www.instagram.com/p/C2ud4HiL-TC/ (Exhibit 33.)
- 52. On 31. 2024. @dmvpym, @dmvdissenters. **Ianuary** @psldc. @palestinianyouthmovement, and @md2palestine again published a joint post publicizing the action scheduled for February 1, 2024 at 7:00 am at Union Station along with the caption "TOMORROW PALESTINE." DC WILL **DOWN** FOR **SHUT** IT www.instagram.com/p/C2xWTnLuFZG/ (Exhibit 34.)
- 53. On February 1, 2024, the Instagram account @dmvpym, in collaboration with @palestinianyouthmovement, @occupationfreedc, @md2palestine, and @dmvdissenters

published a post with still photos showing the blockades, including photographs of activists that had chained themselves together or that were linked together with PVC piping, and blocking intersections. The post included photographs of activists being arrested and was accompanied by the caption "Another major US-city was shutdown for Palestine." The post also noted that the action caused "severe traffic jams all throughout the capital." www.instagram.com/p/C2zwbm1uQk8/?img_index=1 (Exhibit 35.)

- 54. Another post from the same Instagram account, @dmvpym, in collaboration with @occupationfreedc, @palestinianyouthmovement, @psldc, and @dmvdissetners, included a picture of a traffic map that showed traffic stopped from the District well into suburban Virginia, and included the caption "HAPPENING NOW! Pro-Palestine, anti-Zionist protestors stage an act of mass civil disobedience today, blocking traffic in and out of Washington, DC while Congress is in session." www.instagram.com/p/C2zrb8 uP2k/?img index=1 (Exhibit 36.)
- 55. The @dmvpym Instagram account also published a post on February 1, 2024 that included 8 slides with pictures and videos showing activists blockading traffic. The text accompanying the post stated "5 major entrances into Washington, DC HAVE BEEN SHUT DOWN." www.instagram.com/p/C2znqgTuQ97/?img_index=1 (Exhibit 37.)
- 56. On February 1, 2024, Occupation Free DC published to its Instagram account, @occupationfreedc, a video of activists blocking traffic in the District with accompanying text stating "Hundreds of protestors are currently rallying at Union Station and blocking five major highways into D.C." www.instagram.com/p/C2zymu1uL56/ (Exhibit 38.)
- 57. On February 1, 2024, the @occupationfreedc Instagram account joined with the Instagram account of the U.S. Campaign for Palestinian Rights (USCPR), @uscpr, to post five slides with pictures of activists blockading traffic accompanied by text stating "Five major intersections in DC have been blocked, disrupting the morning commute for thousands in the belly of the beast." www.instagram.com/p/C2zrMphiWxD/?img index=1 (Exhibit 39.)

- 58. USCPR also collaborated with the Instagram account @jvpmetrodc to post a video on February 1, 2024 of activists blockading traffic and the response of law enforcement. The text with the post stated "DC IS SHUTDOWN FOR PALESTINE." www.instagram.com/p/C20CWqQClyX/ (Exhibit 40.)
- 59. HWD's Instagram account, @harrietsdreams, posted two items on February 1, 2024 related to the blockade. One post was a video of activists marching and blocking traffic accompanied by text stating "We are currently shutting down five major intersections in DC demanding a #CeaseFireNow #freepalestine." www.instagram.com/p/C2zqzulOLG2/ (Exhibit 41.) The second post was a video outside a United States Park Police station advocating who had for support for activists been arrested. www.instagram.com/p/C2z PYvualx/ (Exhibit 42.)
- 60. On February 1, 2024, PS&L used its national and DC affiliate Instagram accounts, @pslnational and @psldc, to publish two video posts along with the Instagram account @dmvpym. Both videos showed activists either marching or blockading traffic, including video clips showing individuals chained together or linked by PVC piping while blocking traffic. One post had text accompanying the video stating "Right now: Protestors in Washington DC have blocked the intersection in front of the US State Department, which has continually funded and armed the Israeli genocide of Gaza." www.instagram.com/p/C2zm80C0q10/ (Exhibit 43.) The other post was accompanied by text stating "HAPPENING NOW: Hundreds take to the streets of Washington DC to disrupt business as usual." www.instagram.com/p/C2zrKvYOo10/ (Exhibit 44.)
- 61. On February 1, 2024, Dissenters posted or re-posted on its X account four items related to the blockade. One post included text that stated "This morning hundreds of protestors rallied at Union Station and blocked five major roadways in D.C. We #ShutItDown during the morning commute for hundreds of government employees enabling Israel's ongoing genocide against Palestine in Gaza!!" www.X.com/wearedissenters/status/1753101554218139823 (Exhibit 45.)

- 62. On February 1, 2024, the Instagram accounts @dmvdissenters, @wearedissenters, and @dmvpym posted a video showing individuals blockading traffic and interviewing some of the participants. The caption with the post stated "NO BUSINESS AS USUAL FOR WAR CRIMINALS" and text accompanying the post stated "FIVE major roadways are blocked coming into DC." www.instagram.com/p/C2ztc6pOTGM/ (Exhibit 46.)
- 63. On February 2, 2024, @dmvpym and @md2palestine collaborated on an Instagram post with @dmvdissenters soliciting support and assistance for 11 of the 23 arrested activists who remained in custody. The caption of the post read "DROP THE CHARGES EMERGENCY JAIL SUPPORT." www.instagram.com/p/C21U5H uNoD/ (Exhibit 47.)
- 64. On February 3, 2024, @dmvpym, in collaboration with @dmvdissenters, @psldc, @occupationfreedc and @palestinianyouthmovement, published a video approximately one minute and 30 seconds long that included photos and video clips showing activists blocking roadways in the District and listing the five locations that were blockaded. The high production quality video also included video footage from local news broadcasts showing the blockades, one of which noted that law enforcement had been fooled into believing that the action would only be at Union Station because of the "decoy" flyers that had published leading **February** been in the davs up to 1, 2024. www.instagram.com/p/C249bHtu9C5/ (Exhibit 48.)
- 65. On February 6, 2024, DMV Dissenters published to its Instagram account a post that included a video of the blockades with a caption that read "FIVE MAJOR INTERSTATES INTO DC SHUT DOWN FOR PALESTINE!!" The text accompanying the post stated "Last week DMV Dissenters joined @dmvpym @md2palestine @psldc @shutdowndc_@occupationfreedc @jvpdcmetro and others to SHUT DC DOWN." www.instagram.com/p/C3CBpVWt9FU/ (Exhibit 49.)

- 66. On February 9, 2024, the Instagram account @jvpmetrodc posted 2 videos and 3 slides with pictures of activists blockading traffic on February 1, 2024. The text accompanying the post stated "One week ago, JVP-DC Metro helped @dmvpym @dmvdissenters @harrietsdreams @occupationfreedc @psldc and others shut down 5 main roadways into downtown DC." www.instagram.com/p/C3HkcoA091/?img index=1 (Exhibit 50.)
- 67. On **February** 21, 2024, the @dmvpym, Instagram accounts @palestinianyouthmovement, @harrietsdreams, @md2palestine, and @psldc published a post highlighting the February 1, 2024 blockades. The post included seven slides and requested that supporters attend upcoming virtual court hearings for 16 of the 23 arrested activists who charges. still facing potential were www.instagram.com/p/C3nZh1YO2Nu/?img index=1 (Exhibit 51.)
- 68. The accounts on the social media platforms Facebook, X and Instagram associated with the six entities that organized the February blockades contain other posts or reposts similar to the posts referenced herein. These posts contain many of the same or similar images and videos that publicized the action prior to and on February 1, 2024. Likewise, the social media accounts of allied entities like Shut Down DC (@shutdowndc) and USCPR amplified the organizers' message by posting or reposting videos and images of activists blockading traffic in the District on February 1, 2024.

I declare under penalty of perjury under the laws of the United States that the forgoing is true and correct.

Executed on January 30, 2025, in Charlotte, North Carolina.

Respectfully Submitted,

By: NS Hedley

Neville S. Hedley (DC Bar No. 485259)

EXHIBIT 1



Fiscal Sponsorship: A Balanced Overview





This article was first posted online on January 19, 2016.

Fiscal sponsorship is an option that may be available to a person, group, or business to attract charitable funding without starting a nonprofit. It may allow an individual artist to fund the creation of a mural, a group to hold a crowdfunding campaign for pediatric cancer research, or a manufacturer to create and distribute products to regions devastated by a recent natural disaster.

When done right, fiscal sponsorship is a valuable alternative to starting a nonprofit that produces private and public efficiencies through shared administration and fewer nonprofits requiring fiduciary and regulatory oversight.

But when done wrong, fiscal sponsorship may result in an individual or for-profit company inappropriately deriving a private benefit from charitable contributions. This may occur when the fiscal sponsor acts as a mere conduit for contributions to flow to the individual or company without exercising the required control and oversight.

A Definition

The term fiscal sponsorship broadly refers to a number of contractual relationships that allow a person, group, or business to advance charitable or other exempt activities with the benefit of the tax-exempt status of a sponsor organization. These relationships are cogently described in Greg Colvin's seminal book, *Fiscal Sponsorship: Six Ways to Do It Right*. The most widely used models of fiscal sponsorship for charitable projects are:

• Comprehensive (referred to by Colvin as "Model A"), in which the assets, liabilities, and exempt activities collectively referred to as the project are housed within the fiscal sponsor; and

Case 1:25-cy-00289 Document 1-1 Filed 01/31/25 Page 19 of 171

• Pre-approved grant relationship (referred to by Colvin as "Model C"), in which the project is run by a separate entity funded by the fiscal sponsor.

How Fiscal Sponsorship Works

Donations to fiscally sponsored projects are directed to a tax-exempt fiscal sponsor. Most commonly, the fiscal sponsor is a public charity exempt under Section 501(c)(3) of the Internal Revenue Code and a qualified recipient of charitable contributions that are deductible to the donor. The donations intended to support a particular project are treated as restricted funds dedicated to furthering that project's charitable purpose.

The fiscal sponsor must then decide how to use those funds. It may not cede its ultimate control and decision-making authority over the funds to the project leaders. But the fiscal sponsor may delegate management of the funds to specific employees, contractors, or volunteers of the fiscal sponsor (comprehensive fiscal sponsorship). Alternatively, it may grant the funds to a suitable grantee that it vetted earlier (pre-approved grant relationship fiscal sponsorship).

Comprehensive Fiscal Sponsorship

In the comprehensive model, the party entering into the fiscal sponsorship agreement with the fiscal sponsor is generally giving up all ownership and control of the project to the sponsor and retaining only the right to enforce, amend, or terminate the agreement and have the project transferred to another qualified fiscal sponsor. In contrast to the fiscal sponsor, the other party to the agreement is not a tax-exempt entity able to directly receive deductible charitable contributions and is likely not properly registered to solicit charitable funds or assets. Most often, it's just some form of steering committee with minimal activity of its own, which helps minimize any risk that might otherwise be borne by its members.

When working on the fiscally sponsored project, the individuals associated with the other party to the agreement serve as employees, volunteers, or other agents of the fiscal sponsor. Accordingly, if they are fundraising for the project, they are fundraising on behalf of the fiscal sponsor as agents of the fiscal sponsor. Similarly, if they are managing the activities and affairs of the project, they are doing so as agents of the fiscal sponsor, which may afford them the protection of the sponsor's insurance.

In the comprehensive model, the assets and liabilities of the project are the assets and liabilities of the fiscal sponsor. The fiscal sponsor takes on the project, and all of its risks, because it advances the sponsor's own charitable mission. Typically, in light of all of the administrative burdens and costs associated with the project and to ensure its own organizational health, the fiscal sponsor charges an *intra-organizational* administrative fee to the restricted fund dedicated to the project's charitable purposes.

A fiscal sponsor providing comprehensive sponsorship can serve as an effective and efficient vehicle for incubating a new charitable project, testing an innovative idea, implementing a program with a fixed time frame, and hosting a collaborative effort among charities or funders.

Pre-Approved Grant Relationship

In the pre-approved grant relationship model, the party entering into the fiscal sponsorship agreement with the fiscal sponsor is the sponsor's grantee. Unlike with the comprehensive model, the project is owned by the grantee, not by the fiscal sponsor. Accordingly, the project's assets and liabilities belong to the grantee, which is responsible for its own tax and filing obligations.

Generally, the individuals associated with the grantee serve as agents of the grantee when working on the project. But when they are fundraising for the project, they are doing so as agents of the fiscal sponsor. The fundraising must be carried on by the fiscal sponsor because the grantee lacks the tax status to allow for deductible contributions or private foundation qualifying distributions.

The key to this model is to ensure the fiscal sponsor is not serving as a mere conduit for donors and foundations to direct contributions and grants to the fiscal sponsor's grantee. While the fiscal sponsor can accept contributions and grants with a purpose restriction on how they are used, the fiscal sponsor must have ultimate discretion and control on whether to use such contributions and grants itself or re-grant them out to another entity, not limited to the grantee whose representatives may have raised such funds in the capacity as agents of the fiscal sponsor.

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The intended grantee is vetted and pre-approved by the fiscal sponsor prior to any fundraising for the purposes of the project. So long as the grantee has not breached the fiscal sponsorship agreement, the fiscal sponsor will ordinarily grant the funds raised for the project to the grantee, less some agreed upon amount it retains as an administrative fee. While the fiscal sponsor has the variance power to direct such funds to another organization to advance the same charitable purposes, it has a business reason not to exercise such power except under egregious circumstances.

A fiscal sponsor providing pre-approved grant relationship fiscal sponsorship can facilitate broader grantmaking to individual artists producing works to be introduced to the public for noncommercial purposes, nonprofits without an IRS determination of 501(c)(3) status, and discrete charitable programs of for-profit social enterprises. Unlike the fiscal sponsor, such grantees may not be qualified recipients of deductible charitable contributions.

In addition, many, if not most, private foundations have internal rules prohibiting them from making grants to such grantees in part because complex tax laws require them to exercise certain due diligence procedures and threaten them with stiff penalties for a failure to properly comply. In contrast, a private foundation may more safely make a grant to a qualified fiscal sponsor so long as it does not require the sponsor to act as a mere conduit for its grants to flow to a non-exempt grantee.

Fiscal Sponsorship Administration Fee

A portion of the funds raised to advance a particular project's purpose is typically retained by the fiscal sponsor as an administrative fee. But the fiscal sponsor must account for the significant administrative burdens and costs and the risks associated with acting as a fiscal sponsor to a project. For comprehensive fiscal sponsors, such burdens generally include the management and/or administration of charitable solicitations, donations, grants, human resources (including payroll and benefits), volunteers, financial reporting, audits, government filing requirements, and appropriate risk management tools (e.g., insurance, legal counsel).

In many cases, particularly with smaller projects, the costs associated with fiscally sponsoring a project are higher than the administrative fee. This may be acceptable so long as the fiscal sponsor believes that the project's value in advancing the sponsor's mission is worth such net expense. But regardless of whether the administrative fee covers the additional costs, the fiscal sponsor must provide proper management and oversight over the project.

Where Things Go Wrong

Some nonprofits offer fiscal sponsorship as a means for generating additional revenue without adequately managing or overseeing their projects. In a comprehensive fiscal sponsorship, the fiscal sponsor should have the appropriate infrastructure and resources one would reasonably expect of the legal operator of the project. Consistent with such expectation, the fiscal sponsor's delegation of duties to the project leaders should follow only after sufficient due diligence of such individuals and their planned activities. Additionally, the fiscal sponsor should ensure it has appropriate policies to guide the project leaders' actions, maintain oversight of the operations, and protect the charitable assets.

Where a fiscal sponsor neglects its responsibilities, a project can be operated in a manner inconsistent with applicable laws and/or beyond the sponsor's capacity. This scenario can easily come back to haunt a fiscal sponsor and its leaders if the project's activities (1) result in an unexpected liability, like one stemming from a lawsuit, penalty, or fine; (2) trigger additional registration, licensing, or reporting requirements; (3) fall outside of the sponsor's stated purpose in its governing documents; or (4) attract significant negative publicity.

Oversight of a project's activities by regulators and, indirectly, by donors, also becomes more challenging if the sponsor consolidates all of its projects in its information returns and other reports. Accordingly, while the onus is on the fiscal sponsor to properly manage its comprehensively sponsored projects, the additional layer of protection against misuse of charitable assets can be compromised if the sponsor does not keep proper records and the project becomes "hidden" among all of its other projects.

A fiscal sponsor without sufficient capacity may also jeopardize the assets raised for each of its programs by misusing or misdirecting those assets to pay for its general administrative costs or other inappropriate expenses. NPQ has previously covered such scenarios.

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Case 1:25-cv-00289 Document 1-1 Filed 01/31/25 Page 21 of 171 Accordingly, a project's founders seeking fiscal sponsorship should be as selective in choosing an appropriate fiscal sponsor as a fiscal sponsor is in choosing a project. But it would be a mistake to use a fiscal sponsor's administrative fee as the primary selection criteria. More important are the fiscal sponsor's financial health, key personnel, and understanding of its legal responsibilities as a fiscal sponsor. The National Network of Fiscal Sponsors' quidelines for both comprehensive and pre-approved grant relationship fiscal sponsorship are outstanding resources to help assess whether a fiscal sponsor's practices and agreements reflect such proper understanding.

Conclusion

From a legal perspective, a comprehensively sponsored (Model A) project of a fiscal sponsor is generally no different from an internal program of any nonprofit with the exception of the rights the parties may have to transfer the program to another qualified successor nonprofit. And a pre-approved grantee of a fiscal sponsor housing the sponsored (Model C) project is generally no different from a grantee of any nonprofit that elects to grant funds to an individual or nonexempt entity, which is a permissible form of grantmaking for any charity so long as it is done with appropriate restrictions on use.

Fiscal sponsorship, when appropriately structured and implemented, is a valuable alternative to formation of a nonprofit organization, particularly where the sustainability of a separate entity is highly questionable, the charitable endeavor has a relatively short life span, or the project founders lack the capacity to properly administer a compliant nonprofit, tax-exempt organization. While there will always be stories of abuses, as is the case in every field, the problem lies in the implementation and not the lawful practice of fiscal sponsorship done right. Fiscal sponsors must be diligent in helping to educate the field and the broader community to preserve and best utilize this important and often misunderstood form of collaboration.

About the author



Gene Takaqi Gene Takagi is a Principal at NEO Law Group, contributing publisher of the Nonprofit La...

EXHIBIT 2

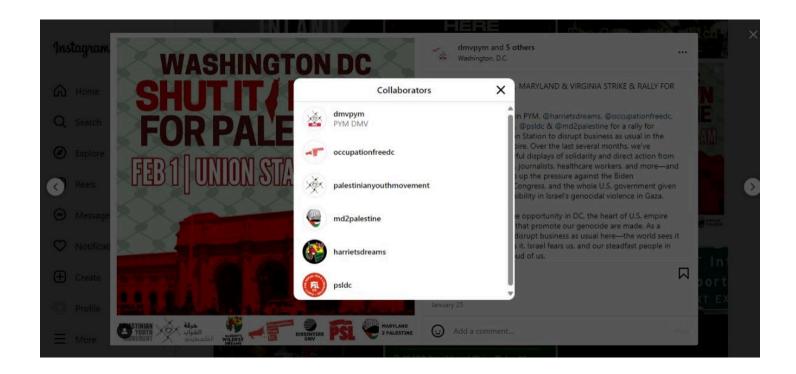
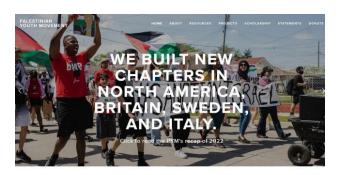




EXHIBIT 3



We are a transnational, independent, grassroots movement of young Palestinians dedicated to the liberation of our homeland and people.



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2022 YEAR IN REVIEW

Statements



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SUPPORT OUR PEOPLE IN LEBANON IN THE FACE OF THE COVID-19 GLOB/ PANDEMIC

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CALLING FOR COLLECTIVE RESPONSES TO THE COVID-19 PANDEMIC NO. 03.2000

NO FREE HOMELAND WITHOUT FREE WOME



THE PALESTINIAN YOUTH MOVEMENT STANDS WITH WET SUWET





EXHIBIT 4

Case 1:25-cv-00289

About

ABOUT (/ABOUT)

CONTACT (/CONTACT)

YEAR IN REVIEW 2022 (/YEAR-IN-REVIEW)

JOIN THE PYM! (/JOIN)

The Palestinian Youth Movement ("PYM") is a transnational, independent, grassroots movement of young Palestinians in Palestine and in exile worldwide as a result of the ongoing Zionist colonization and occupation of our homeland. Our belonging to Palestine and our aspirations for justice and liberation motivate us to assume an active role as a young generation in our national struggle for the liberation of our homeland and people. Irrespective of our different political, cultural and social backgrounds, we strive to revive a tradition of pluralistic commitment toward our cause to ensure a better future, characterized by freedom and justice on a social and political level, for ourselves and subsequent generations.

OUR VISION

Due to the accumulating challenges as a result of the ongoing Zionist colonization and occupation of our homeland, our determination to fulfill our aspirations for return and liberation are stronger than ever. Guided by principles of justice and liberation, we recognize that our struggle is inherently connected with the struggles of all oppressed and indigenous peoples. We affirm that our struggle is deeply rooted in the Arab regional context that must be freed of neocolonialism in order for the complete liberation of Palestine to become a tangible reality.

Our vision is to mobilize Palestinian youth, strengthen our role and assume responsibility and accountability to our national struggle. In order to revitalize our participation in the Palestine liberation struggle, we build upon historical and lived experiences that allow us to understand our various current realities while defending a strong common vision for Palestine.

WHAT DO WE DO?

PYM is a space that brings together Palestinian youth from all over the U.S and Canada. with diverse views and various political, cultural and social backgrounds in a collective process of decision making, leadership building, and action. By cultivating the skills of young Palestinians we work toward empowering the Palestinian grassroots movement locally and ultimately around the world. We do this by:

 Initiating grassroots, community-based organizing on the ground, particularly addressing the context and needs of the Case 1:25-cv-00289

Document 1- Arab Palestinian / Communities 28e No Fin while maintaining PYM's Return and Liberation framework of struggle.

- Organizing specialized Palestinian youth workshops and local, national and international programming aimed at developing leadership skills and critical analysis among our members and Palestinian youth through a rigorous educational curriculum we continue to develop through our biennial Summer Schools.
- Celebrating, commemorating, and honoring our culture, heritage and national historical events simultaneously via local community-based events.
- Participating in forums, conferences, events, and initiatives that seek to challenge colonialism, racism and injustice globally through a joint-struggle approach.
- Growing and developing with third world solidarity allies to maintain and build relationships tying the Palestinian struggle for liberation among all indigenous peoples.
- Sustaining our organization via grassroots fundraising and donations from our generous supporters.

BOARD MEMBERS

The current National Executive Board (NEB) can be contacted at the below e-mails.

General Coordinator - gc@pymusa.com

Vice General Coordinator - vgc@pymusa.com

Community Development Coordinator - community@pymusa.com

Internal Development Coordinator - internal@pymusa.com

Project and Chapter Development Coordinator - project@pymusa.com

General e-mail - pym@pymusa.com

Support Palestinian community organizing with a donation today!

SUPPORT PALESTINIAN COMMUNITY
ORGANIZING
(HTTPS://WWW.PYMUSA.COM/DONATE)

SUBSCRIBE

Sign up with your name email address to receive news and updates from the Palestinian Youth Movement (PYM).

First Name			Last Name			
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EXHIBIT 5

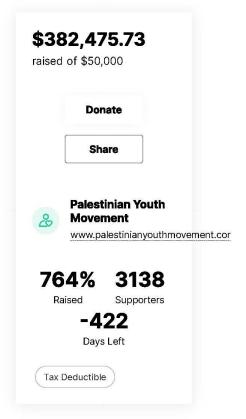






Support Palestinian Youth Organizing in 2023!

The **Palestinian Youth Movement** is a grassroots and independent movement of Palestinian and Arab youth struggling toward the liberation of our homeland and our people.



1 of 3 2/27/2024, 1:14 PM

With 14 chapters across North America, and emerging branches in London, Sweden, and Italy we are working to mobilize our communities through educational programming, campaigns, and projects.

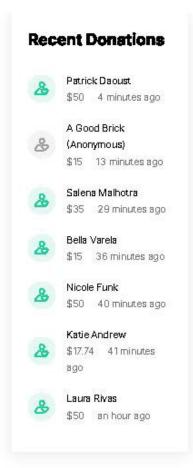
This past year, we mobilized thousands of people across North
America at actions and rallies; held our largest summer school with 100
Palestinian and Arab youth where we learned about Palestinian history,
identity, movement building; expanded to Sweden, Britain, and Italy;
held commemorations across the continent for the 50th anniversary of
Ghassan Kanafani's assassination where we launched our annual
Ghassan Kanafani Resistance Arts Scholarship and Anthology; and
organized community and cultural events across North America

We could not have done this without community support. As an entirely youth-led and volunteer-driven organization, we are relying on community support to get us through 2023! Support Palestinian youth organizing by donating today. Thank you!

All donations are tax-deductible. You will receive a follow-up e-mail with the relevant info.

We also accept checks payable to "WESPAC Foundation" and mailed to 77 Tarrytown Rd, Suite 2W, White Plains NY 10607. Please indicate"PYM" in the memo line.

Contact palyouth.usa@gmail.com for any questions!



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EXHIBIT 6



Home Wh

Who We Are What \

What We Do

Media Center

er v Support Us v

Contact & Sign Up



Welcome WESPAC



Support Us With A Donation

DONATE

Upcoming Events

SEP 4:30 pm - 6:30 pm

11

Cooking Up Community with Chef Green

SEP 7:00 pm - 8:30 pm

11

WESPAC Liberation Book Club

SEP 1:30 pm - 4:30 pm

15

We Refuse to Remain Enemies: Meet Israelis and Palestinians Who Are Still Working Together Symposium

SEP 6:00 pm

17

The Devil We Know Screening at Greenburgh Public Library

View Calendar

The Latest

Membership Appeal 2024

Sep 4, 2024

Hello WESPACers! As we enter September, it is time for our annual Membership Appeal. You can find a digital copy of the appeal letter here. In our 50th year, we particularly reflect in gratitude on the support of this wonderful community. Thank you in advance for your... read more

WESPAC August 2024 Solidarity Newsletter

Aug 9, 2024

If you missed it in your inbox, here is this month's newsletter: WESPAC August 2024 Solidarity Newsletter! read more

Support University Students and the Struggle for Food Sovereignty!

Jun 4, 2024

WESPAC has had the pleasure of working with Sarah Lawrence College students over the last semester period. A couple of these students have created a community fridge in Yonkers for the Sarah Lawrence community. Learn more about it at the below links: Website:...

read more

TOMORROW: Volunteers needed in Mount Vernon Garden

Aug 16, 2024

read more

US Corporations Pump Aquifers Dry as Police Kill Water Defenders

Jul 30, 2024

Excellent (and lengthy) article about the devastating environmental and human effect of NAFTA and neoliberal policies on a community in Mexico. Persisting even under AMLO and possibly Sheinbaum... ...

read more

Public Banking Act Support

Jun 4, 2024

This legislative session, New York has a historic opportunity to bring public banking to our state! After years of campaigning to pass the New York Public Banking Act we now have a chance to bring public banking to Rochester which would be the first public bank in the...

read more

H2OO New Youth Cohort Application

Aug 16, 2024

Heirs To Our Ocean (H2OO) is recruiting youth aged 16–25 for the 5th Cohort of the U.S. Youth Action Council for the UN Ocean Decade (U.S. YAC UNOD). H2OO is an official UN Ocean Decade partner, and this Council is endorsed as a Decade Action in collaboration with the... read more

WESPAC June 2024 Solidarity Newsletter

Jun 12, 2024

If you missed it over email, check out the June 2024 Solidarity Newsletter!

read more

WESPAC Annual Awards! Sunday, June 2nd at 2pm in Rye, NY!

Apr 16, 2024

read more

« Older Entries

WESPAC on Facebook



Explore WESPAC

1 week ago

This Wednesday, WESPAC is hosting Osama Iliwat and Rotem Levin for a conversation about Palestinian and Israeli peace activism. Please RSVP at wespacfoundation@gmail.com, and read more above!



Photo

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Explore WESPAC

2 weeks ago

This Wednesday, WESPAC is hosting Osama Iliwat and Rotem Levin for a conversation about Palestinian and Israeli peace activism. Please RSVP at wespacfoundation@gmail.com, and read more below:



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Explore WESPAC

2 weeks ago

The organizers are planning a nonviolent civil disobedience component. If you would like to participate in the civil disobedience, please let me know and I will connect you:



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Explore WESPAC

1 month ago

Good morning, all,

I have checked with Lana and she is happy for me to share this write up about her and her family. Her father is from the ancient Christian Palestinian Shawa family in Gaza. They have lost 92 members of their extended family in Israel's bombing of Gaza. Lana was introduced to WESPAC after October 7th last year:

www.greenwichtime.com/news/article/ct-greenwich-palestinian-american-1 ... See More

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Explore WESPAC

2 months ago



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WESPAC on Twitter





Case 1:25-cv-00289 Downspace foundation File and Market Downspace 1:25-cv-00289 Downspace File Market Downspace 1:25-cv-00289 Downspace 1:25

WESPAC has been working for #peace & #socialjustice for 48 years. We work for a #progressive agenda for the planet & its peoples. wespacfoundation@gmail.com

WESPAC Foundation Retweeted



Frack Action @frackaction · 22 Aug



"This new, experimental form of gas drilling is highly untested and poses a lot of the same threats to our air, water and communities as the conventional, high-volume hydraulic #fracking," Renee Vogelsang, NY Director at Frack Action @GovKathyHochul

 \bigcirc \bigcirc 7 \bigcirc 9 Twitter

₩ESPAC Foundation Retweeted



UAW @uaw · 22 Aug



If we want the war in Gaza to end, we can't put our heads in the sand or ignore the voices of the Palestinian Americans in the Democratic Party. If we want peace, if we want real democracy, and if we want to win this election, the Democratic Party must allow a Palestinian...

₩ESPAC Foundation Retweeted



IfNotNow

@ifnotnoworg · 22 Aug



"We have enough tears to cry for two peoples. Freedom for Palestinians does not put Jews in danger." -@Junesfinalrose

#LetPalestineSpeak #NotAnotherBomb



WESPAC Foundation @wespac_ny · 22 Aug



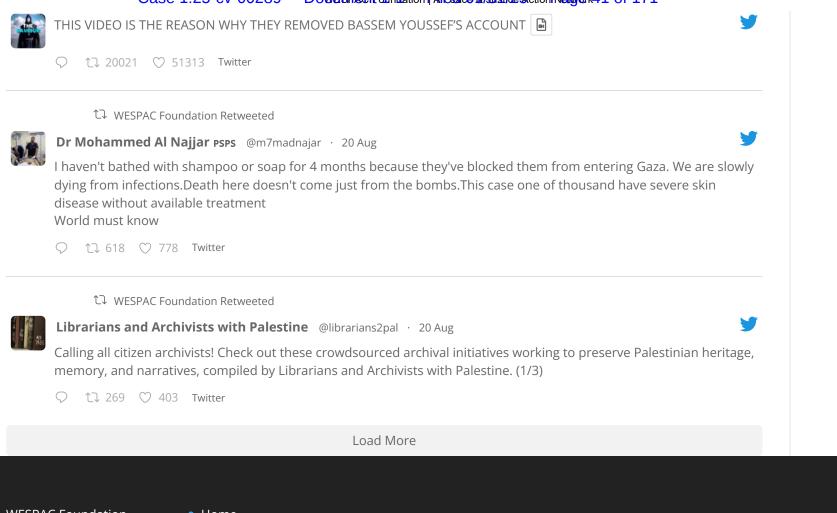
The organizers are planning a nonviolent civil disobedience component. If you would like to participate in the civil disobedience, please let me know and I will connect you:

40

 \bigcirc 1 1 \bigcirc 1 Twitter

☼ WESPAC Foundation Retweeted

The Saviour @stairwayto3dom · 20 Aug



WESPAC Foundation
77 Tarrytown Rd.
Who We Are
White Plains, NY 10607
914-449-6514
wespacfoundation@gmail.com
Contact & Directions





Support Palestinian Youth Organizing!



The **Palestinian Youth Movement** is a grassroots and independent movement of Palestinian and Arab youth struggling toward the liberation of our homeland and our people.

With **14 chapters across North America and Europe**, we work to mobilize our communities through educational programming, campaigns, and projects.

Case 1:25-cv-00289 Document 1-1 Filed 01/31/25 Page 44 of 171

As a grassroots, volunteer-driven organization, we rely on your contributions and the support of our community. All US based contributions are tax-deductible and you will promptly receive your tax deduction information.

We also accept checks payable to "Honor the Earth" and mailed to 1430 Haines Ave STE 108 #225, Rapid City, SD, 57701. Please indicate "PYM" in the memo line.

Thank you	!
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Contact: palyouth.usa@gmail.com

Tax Deductible

Amount

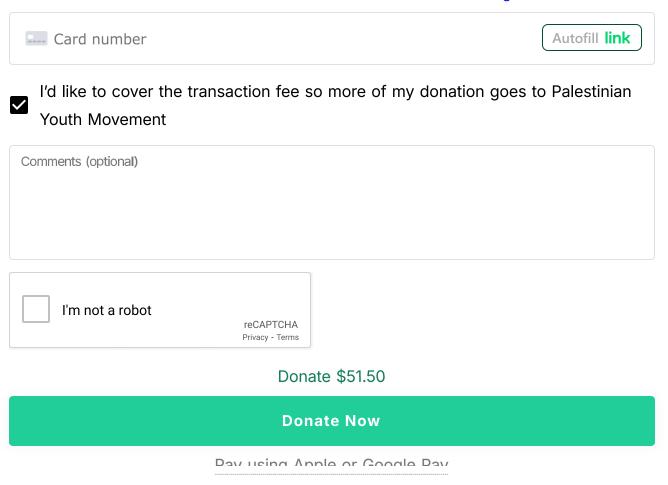
\$50	\$100	\$250	\$500
\$ 50			
■ MONTHLY			

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Subscribe to notifications from Palestinian Youth Movement.

Payment Information



Palestinian Youth Movement has partnered with Goodbricks to securely process your online donation.

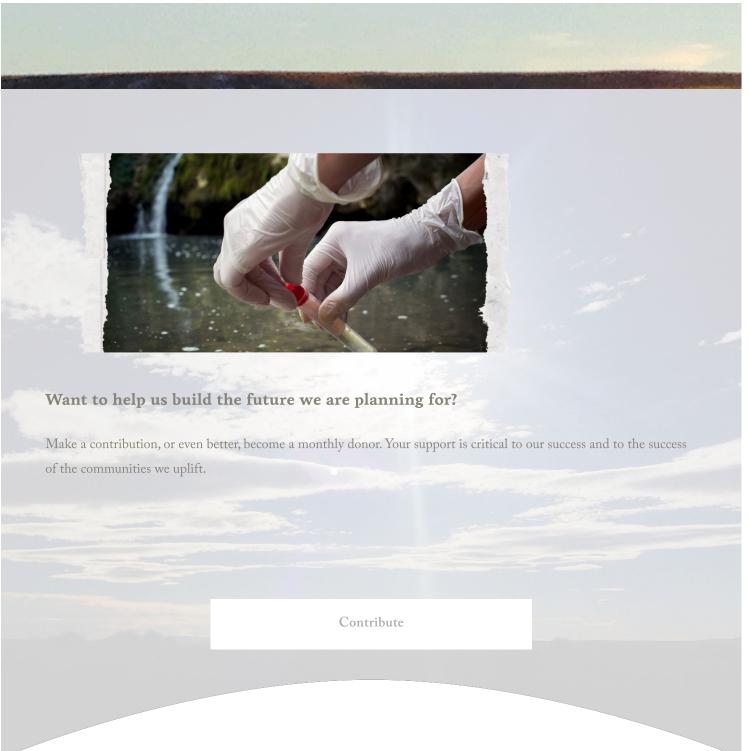
Need help? Email support@goodbricks.org

This transaction is subjected to Goodbricks Terms and Privacy Policy.

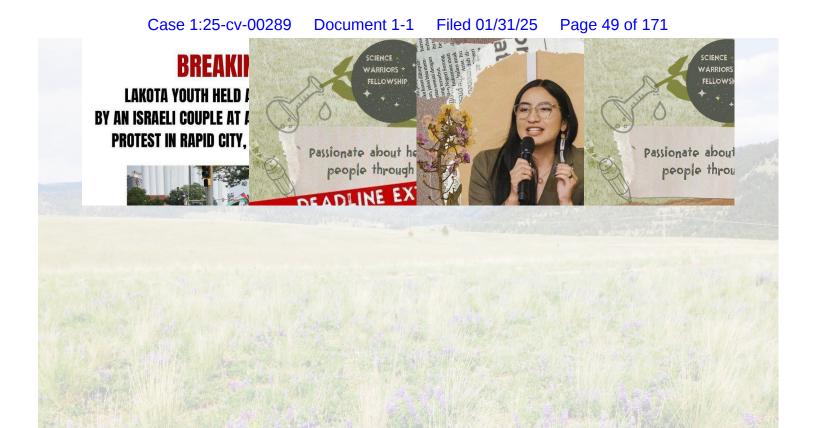
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Honor the Earth is an Indigenous-led organization fighting to dismantle settler-colonialism, racial capitalism, white supremacy, and imperialism by helping our communities resist exploitation, withstand crises, and prepare future generations of leadership. We envision a future rooted in *Indigenous sovereignty* and lifeways, where all Peoples live in right relationship with Mother Earth and each other.



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Honor the Earth 1430 Haines Ave STE 108 # 225 Rapid City, SD 57701



Amy Sazue

Eve Reyes-Aguirre,...

Lenna Zahran Nası

Betty Lyor

Sharon Lungo, Trea..

Palestinian

Lenna Zahran Nasr is a Palestinian/Lebanese organizer from Jerusalem & Bethlehem born and raised in exile on occupied Tickanwa-tic land (Central Texas). She believes that Indigenous sovereignty and Global Indigenous Solidarity is a key component of principled anti-imperialism and the creation of a better world.

She brings experience in building out student and movement institutions focused on advocacy and agency from the grassroots. Her specialty and passion is political education pedagogy and movement culture.

Since 2017, she has played a critical role supporting the student movement at UT Austin and Nationally across the so-called United States. She regularly leads political education workshops for Arab community on Indigenous struggle on Turtle Island, Puerto Rican struggle, Black struggle, and the role of youth and students in the Palestinian struggle, and demilitarism. She is a proficient researcher and has been recently featured in articles written in both English and Arabic.

In Austin, Lenna brings together individuals and activists from a plurality of backgrounds to build a strong movement for Palestine. While she is an organizer with deep roots in her local community, she also brings experience from International struggles and relationships.

In 2018, she co-organized and participated in the historic Indigenous Delegation to Palestine, which brought Palestinian youth living in exile on Turtle Island and young Indigenous land-defenders and water-protectors (Kumeyaay, Yaqui, Diné, Kānaka Maoli) together to Palestine.

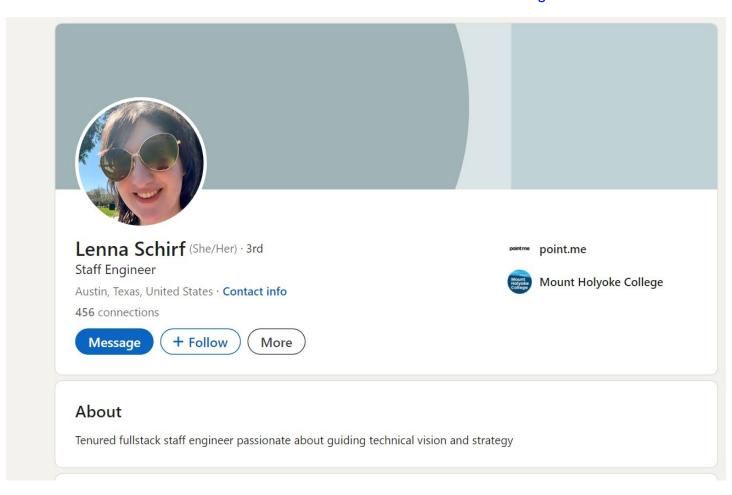
In 2019, she was honored to be invited on The Red Nation's delegation to Dinétah and Pueblo Territories, which explored themes of border towns, extraction, food deserts, mancamps, MMIWG2+, kinship, culture, and sovereignty.

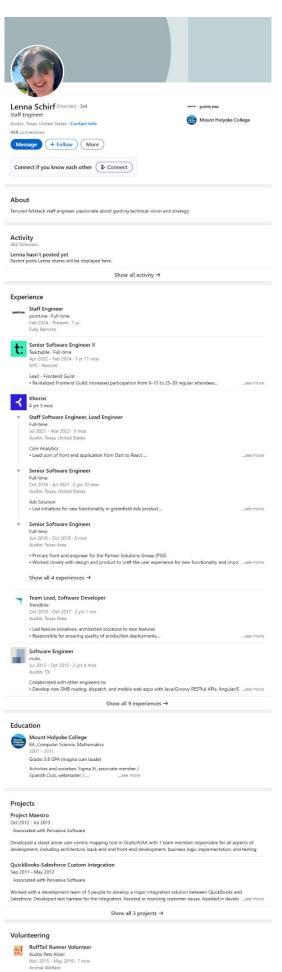
In 2021, she traveled to Cuba on a delegation with the Interfaith Community Organization with a focus on grassroots community coalitions whose focus ranged from cultural work and advocacy to health infrastructure.

Lenna has a robust background in legal and compliance. She is detail oriented and driven by a passion of social justice for all people, rematriation / Land Back and tackling Environmental Racism at its roots. She believes that, when the people organize they can win.

She currently serves as a lead organizer with Palestinian Youth Movement.

Honor the Earth PO Box 1531, Lame Deer, MT 59043









npaign Resources Worst Practices Calendar Donate















Why is the DC Metropolitan Police Department (MPD) training with Israeli military and police, who recently killed over 130 Palestinians marching for their freedom in Gaza?

We at Occupation Free DC call for an end to these trainings. We advocate for community safety through ending police violence and investing in local resources for DC Metro residents. Please share & sign our petition demanding an end to these trainings.

SIGN OUR PETITION

Our Partners

From the US to Palestine, we know that the path to safety for all is in building joint struggles for justice and showing up to protect and defend one another. That's the exchange-between people's movements rather than policing-that we must grow.

Our campaign is a direct response to the Boycott, Divestment and Sanctions call from Palestinian civil society, local DC initiatives like the NEAR ACT, and the Movement For Black Lives Policy Platform call to divest from deadly systems and invest in education, health, and safety of Black people. We also see this campaign as complementary to the defense and expansion of the definition of sanctuary, led by groups like Mijente and Enlace.

Locally, we are working with an incredible group of campaign partners, which are represented below. If you're part of an organization or group, we invite you to endorse the campaign.













































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1/30/25, 6:03 PM



About Join Events Resources Donate

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SOCIAL MEDIA FEED



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Statement w/ @OFDC_Campaign:
Today, @cmdgrosso introduced an amendment to DC's police reform bill to ban MPD from participating in discriminatory & military trainings.
DC's progressive leaders must seize this moment to support community demands to demilitarize and #DivestfromMPD.

COMBATTING RACIST POLICE VIOLENCE IN THE DC AREA

WAYS YOU CAN HELP

SUBMIT TESTIMONY TO DIVEST FROM THE DC POLICE

DONATE TO BLM DC LEGAL SUPPORT

MAKE A CALL / SIGN A PETITION

DONATE MONEY

FOLLOW & AMPLIFY

READ OR WATCH SOMETHING

DC Mayor's Police Complaint line: (202) 727 - 3838 (866) 588 - 0569

Call Script

Hello, I am a DC resident calling for the immediate and unconditional release of all protestors currently detained in a 'kettle' at Swann and 15th St NW. The DC Police, National Guard, and other law enforcement agencies brutally attacked, tear gassed, shot, and arrested our community members. It is not lost on us that it is because we are demanding an end to racist police brutality that we have been met with this extreme violence. I am demanding that Mayor Bowser calls for the release of all protestors being detained and immediately lifts the curfew that directly contributed to this state violence. Release them now.

JVP - DC Metro

Thank you @AbbyChavaStein! https://t.co/0r7kmDKnAQ Jul 13, 2022, 9:31PM

JVP - DC Metro

RT @kpYES: That the first thing on Biden's Middle East trip itinerary was a guided tour of Israeli weapons systems--arranged a...

https://t.co/ZXrk041VNB Jul 13, 2022, 9:30 PM

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Love this so much! https://t.co/hoJIKbg94z Jul 13, 2022, 9:25 PM

JVP - DC Metro

What a mensch! https://t.co/N4NZH2ob8v Jul 13, 2022, 9:23 PM

Follow @JVPDCMetro

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1/30/25, 6:03 PM



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CAMPAIGNS

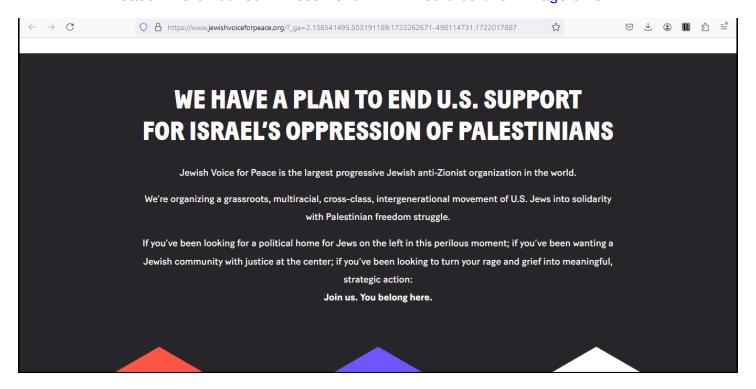


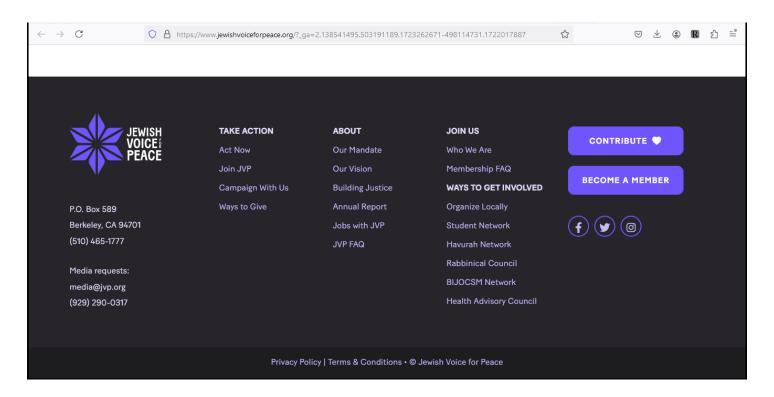


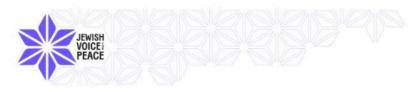










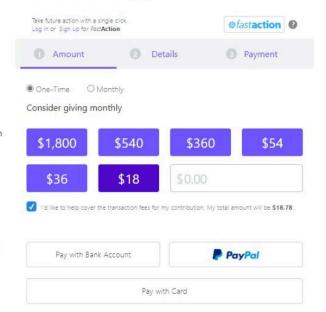


Donate to JVP-DC Metro Chapter

Thank you for supporting JVP-DC Metro.

Your contribution supports JVP's work to organize a grassroots, multiracial, crossclass, intergenerational movement of U.S. Jews into solidarity with Palestinian freedom struggle, guided by a vision of justice, equality and dignity for all people.

It's because of you, and thousands of people like you, that we've grown our power to effectively mobilize hundreds of thousands to end U.S. complicity in Israeli apartheid.



Donate by phone: 1-510-465-1777, Mon-Fri 9:30-4:30PM PST

Donate by check: P.O. Box 589, Berkeley, CA 94701

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Read about our Donor Privacy Policy and Core Principles.

Thank you for your support! You'll be added to JVP's email list.

You can view and update your payment and contact information
through our self-service page.

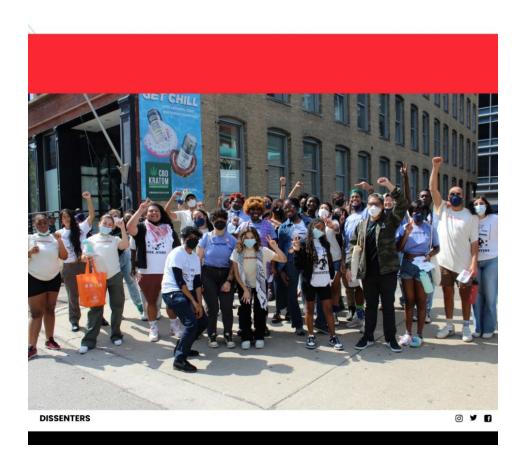
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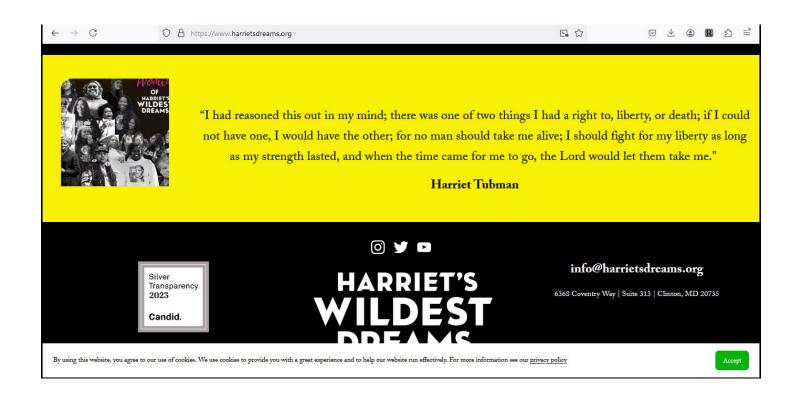


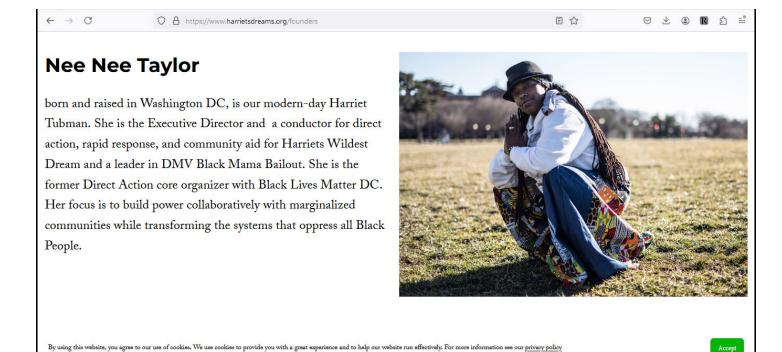
Dissenters is leading a new generation of young people to reclaim our resources from the war industry, reinvest in life-giving services, and repair collaborative relationships with the earth and people around the world.

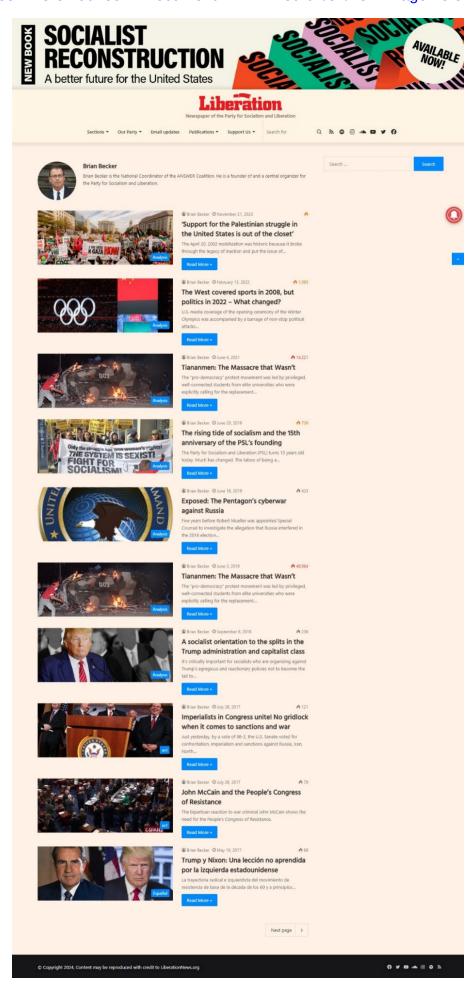














United States Department of the Interior

NATIONAL PARK SERVICE National Capital Region 1100 Ohio Drive, S.W. Washington, D.C. 20242

PUBLIC GATHERING PERMIT

Permit: NCA-NAMA-EVNT24-1278 Date: July 23, 2024

In accordance with Park Regulations as contained in C.F.R., Title 36, Chapter 1, Section 7.96, permission is granted to conduct a public gathering to the following:

Person(s) and/or Organization(s): ANSWER Coalition

Dates & Time(s): 7/24/2024 5:00 AM To: 7/24/2024 4:00 PM

Location(s):

Columbus Plaza; John Marshall Park; Pennsylvania Avenue North Sidewalk, 3rd - 5th Street

Pennsylvania Avenue South Sidewalk, 3rd - 5th Street

Purpose: Stop the genocide in Gaza

Anticipated Number or Participants: 5000

Person(s) in Charge: Brian Becker

Address(es): 617 Florida Avenue NW, Washington, Washington, DC, 20001 Phone Number: (202) 904-7992 Office Mobile Number:

On-Site Contact: Layan Fuleihan Mobile Number: 646-244-3897
On-Site Contact: Mara Verheyden-Hilliard Mobile Number: 202-270-3533
On-Site Contact: Carl Messineo Mobile Number: 202-277-4625

This permit is granted subject to the following conditions:

- 1. Permittee and all participants authorized therein must comply with all of the conditions of this permit and with all reasonable directions of the United States Park Police.
- 2. All sidewalks, walkways, and roadways must remain unobstructed to allow for the reasonable use of these areas by pedestrians, vehicles and other park visitors.

PERMITTEE IS RESPONSIBLE FOR READING AND ADHERING TO ATTACHED ADDITIONAL CONDITIONS.

^{*}Organizer refused to provide specific locations for onsite contacts.

ISSUED TO: ANSWER COALITION

LOCATION: JOHN MARSHALL PARK, PENNSYLVANIA AVENUE NHS, NORTH AND SOUTH

SIDEWALKS, AND COLUMBUS PLAZA DATE: JULY 24, 2024 (5:00 AM -4:00 PM)

Activity Overview:

The ANSWER Coalition will conduct a demonstration to stop the genocide in Gaza. The demonstration will occur from 10:00 am -1:00 pm feature speeches and conclude with a march to Columbus Plaza. The primary location for the demonstration is on the closed portion of Pennsylvania Avenue between $3^{rd}-5^{th}$ Streets. There will be portable restrooms, hydration station, button sales area and a first aid stand setup in John Marshal Park. The Pennsylvania Avenue sidewalks between $3^{rd}-5^{th}$ Street will be used as overflow area for participants. The maximum estimated number of participants is 5000.

Timeline Overview

Pennsylvania Avenue -3rd -4th Street (MPD Jurisdiction)

5:00 am	Setup of Stage and delay towers		
6:00 am - 12:00 pm	Staggered bus drops on C Street between 4th-6th		
10:00 am – 11:00 am	Pre-rally music and speeches		
11:00 am – 1:00 pm	Demonstration		
1:00 pm 1:15 pm	March to Columbus Plaza		

John Marshal Park and Pennsylvania Avenue between 3rd -5th Streets

5:00 am	Delivery of portable restrooms and setup of tents
6:00 am - 11:00 am	Buses arrive.
6:00 am – 2:00 pm	Portable Restrooms, First Aid and Hydration Stations open
1:15 pm – 3:00 pm	Clean up and removal of equipment
4:00 pm - 7:00 pm	Buses pickup on C Street

Columbus Plaza

2:00 pm - 2:15 pm	March arrives in Columbus Plaza
2:15 pm – 3:45 pm	Rally: chant, hold signs.
3:45 pm - 4:00 pm	Participants begin to disperse.

John Marshall Park -authorized equipment.

3 - 10x10ft Canopy Tents

VOLUNTEER TENT:

Table x3 Chairs x10

WATER TENT:

Table x3 Chairs x10 Water

FIRST AID TENT:

Table x3 Chairs x10

Pennsylvania Avenue sidewalks (north and south)

Table Buttons

ISSUED TO: ANSWER COALITION

LOCATION: JOHN MARSHALL PARK, PENNSYLVANIA AVENUE NHS, NORTH AND SOUTH

SIDEWALKS, AND COLUMBUS PLAZA DATE: JULY 24, 2024 (5:00 AM -4:00 PM)

Columbus Plaza

Handheld signs
Portable sound system

March route

Exit Pennsylvania Avenue and 3rd Street
East on Constitution Avenue cross 3rd Street
Northeast onto Louisiana Avenue
East on Massachusetts Avenue
Enter Columbus Plaza

General Conditions

- A. This permit authorizes the use of the following park areas located within National Mall and Memorial Parks from 5:00 am on July 24 and concluding at 4:00 pm on July 24, 2024:
 - a. John Marshall Park
 - b. Pennsylvania Avenue NHS north and south sidewalks between $3^{rd} 5^{th}$ Streets
 - c. Columbia Plaza (2:00 pm -4:00 pm)
- B. All structures must adhere to attached site plan; no additional structure (s) may be erected except in accordance with the site plan, permit and in coordination with permits office. Permittee indicated they are no longer setting up symbolic tents as part of the demonstration. Structures not listed in the permit will be removed and all permitted structures must be erected by the start of the demonstration rally start time. See equipment list above. No site plan was provided by organizer as required by event guidelines.
- C. *NOTE: Due to the possibility of security measures, Presidential movements, and Head of State visits, permitted activity locations may be, temporarily moved and/or suspended.
- D. The permittee is responsible for adhering to NCA Fire and Life Safety Temporary Event Policy and ensuring that all generators, tents, portable heaters and other applicable equipment adhere to requirements outlined with the document and this permit. The permittee assumes full responsibility for event elements safety and must ensure their contractors fully understand requirements outlined in the permit. In addition, the site must be ready for inspection by AHJ and/or designated representative prior to the event and upon request.
- E. The Permittee is responsible for obtaining the necessary permissions and/or additional permits from the Metropolitan Police Department (202) 671-6522, United States Capitol Police (202) 224-8891or from other federal, state or local agencies or departments for the use of public lands other than those under the jurisdiction of the National Park Service.
- F. Due to the exceptional time constraints associated with this permit and the complexity of multiple vendors bringing materials and equipment to park land, special attention is assigned to the requirement that the permittee must at all times provide an on-site coordinator at each permitted location to be accessible to National Park Service and United States Park Police personnel during the setup activities and during the load in/out of the event.

ISSUED TO: ANSWER COALITION

LOCATION: JOHN MARSHALL PARK, PENNSYLVANIA AVENUE NHS, NORTH AND SOUTH

SIDEWALKS, AND COLUMBUS PLAZA DATE: JULY 24, 2024 (5:00 AM -4:00 PM)

G. If Permittee or its agents/representatives/contractors/subcontractors cause any injury or damage to park system resources, they may be liable for costs and damages in accordance with the System Unit Resource Protection Act, 54 USC §§ 100721-100725.

- H. Permittee will be responsible for any injury to, loss of, or damage to federally owned or controlled lands, waters, or resources (natural or cultural resources or facilities) resulting from Permittee's activities under this permit, 18 USC § 1361.
- I. All request, correspondence and meetings with the National Park Service pertaining to this permit shall be scheduled by the <u>permittee in writing only</u>. All contractors, subcontractors or consultants must channel their request through the recognized representatives of the permittee who in turn will contact the National Park Service representative.
- J. The Permittee is responsible for providing all necessary equipment/objects to conduct this activity. All equipment must be removed from the park immediately following the conclusion of the event. Items left in the park will be considered abandoned property and will be removed by the National Park Service.
- K. Throughout the course of the permit, the Permittee will require employees/volunteers, and contractors, to exercise special care and attention to protect the resources of the permitted area and its environs. In addition, the Permittee must supervise their contractors, volunteers, and employees during setup and teardown to assure that there is no damage to park resources. The onsite contacts for ANSWER are:
 - 1. John Marshal Park:
 - 2. Columbus Plaza:
 - 3. Pennsylvania Avenue North Sidewalk b/w 3rd-5th Strs.:
 - 4. Pennsylvania Avenue South Sidewalk b/w 3rd-5th Strs.:

The contacts must be present physically present at each of the location for the entire duration demonstration permit times. (See above timelines)

- L. The permittee shall require all employees and/or contractors to exercise all normal and reasonable safety precautions and to protect park visitors and property. Suitable devices such as barricades, fences, lanterns, etc. necessary for employee and public safety, shall be provided and adequately maintained. Such devices require the concurrence of the NPS Coordinator or designated representative.
- M. Marshals: The ANSWER Coalition will provide at least 200 identifiable marshals to coordinate the various areas of the demonstration. All marshals involved with the organization will wear hi-res security vest and/or armbands. Pursuant to 36 CFR 7.96 (g)(5)(xii) organizers must undertake in good faith all reasonable action to provide sufficient marshals, to ensure good order and self-discipline in conducting such demonstration. Marshals should be aware of their responsibilities and location(s) where they will be stationed and have received from organizers adequate training and instructions. Marshals should be aware of the time and location of the assembly and any march routes, the location of any first aid stations, water, and toilets, be knowledgeable of the NPS permit conditions, be able to communicate with law enforcement. Marshals' area expected to report any problems they observe to Law Enforcement and/or National Park Service Permit Monitors. While marshals do not act as police, they do help maintain order among participants, explain to non-participants that a particular area may be under permit, and be able to alert their supervisor and the United States Park Police in the event they observe a problem on Federal parkland.

ISSUED TO: ANSWER COALITION

LOCATION: JOHN MARSHALL PARK, PENNSYLVANIA AVENUE NHS, NORTH AND SOUTH

SIDEWALKS, AND COLUMBUS PLAZA DATE: JULY 24, 2024 (5:00 AM -4:00 PM)

- N. No interference with the pedestrian traffic and no blocking of entrances, sidewalks, or driveways is allowed. No impediment to or disruption of vehicular traffic is permitted. All areas are to remain open to the general public at all times.
- O. <u>Medical Aid:</u> Person in charge is responsible for providing first aid services onsite. Permittee is required to adhere to recommendations provided by DC Fire and EMS. Permittee can rely on 911 for transport of patience. At a minimum permittee must have one Basic Life Support Medical Aid station and mobile med teams in all permitted locations. Please see attached plan for permittee medical plan.
 - 1. John Marshall Park

Permittee per written first aid plan: Hydration Station(1) and First Aid Station (1) staffed by doctors, nurses and health care professionals from $10 \text{ am} - \sim 1:00 \text{ pm}$.

P. Commercial Advertising Signage: Consistent with long-standing NPS regulations and policy, and Public Law 108-108, Title I, §145, the erection, placement, or use of structures and signs bearing commercial advertising is prohibited for any special event. The recognition of special events sponsors, however, may be allowed if it has been specifically authorized by this permit.

A permit may be issued that authorizes the recognition of sponsors of special events, if the NPS determines that the size and form of the recognition is consistent with the special nature and sanctity of the National Mall or any other requested park area, and if the lettering or design identifying the sponsor is no larger than one-third the size of the lettering or design identifying the special event. Further, to the maximum extent practicable for such special events, public use of and, access to the National Mall and other parkland is not to be restricted.

The Permittee shall submit a sign plan for NPS review and approval. Any request seeking NPS approval for sponsor recognition must be submitted to the NPS at least 14 days prior to the proposed event, and if approved by the NPS, will be authorized within the terms of the special event permit. Authorized sponsor recognition must be in keeping with NPS policy, regulations, and laws and be appropriate to the scale and theme of the special event. Further, the overall size, number, and design of any signs or banners shall be appropriate to the park setting and lettering or design identifying the special event. Signs and banners may not be affixed to existing trees or other NPS facilities or structures.

Only signs and/or banners specifically identifying and/or announcing the event or portion of the event are permitted. Commercial sponsors may be recognized on these same banners by letters and/or logos not to exceed one-third the height and width of the primary lettering identifying the event.

Q. Special attention is drawn to item #4, on the last page of this document, concerning solicitation and sales. No fee may be collected, donation solicited, or commercial activity conducted. No items may be sold or offered for sale except for books, newspapers, leaflets, pamphlets, buttons and bumper stickers which contain a message related to your demonstration or special event. Permittee will have onsite sales at John Marshall Park, Pennsylvania Avenue Sidewalks north and south between 3rd-4th Streets, the stand or structure may consist of one table per site, which may be no larger than 2 ½ ft by 8ft or 4ft by 4ft. The dimensions of the sales site may not exceed 6ft (w) by 15ft long by 6ft high. No other items maybe sold other than those listed.

Sales table is located in the John Marshall Park and Pennsylvania Avenue Sidewalks between $3^{\rm rd}-5^{\rm th}$ Streets, permittee has not provided a detailed site plan. Permittee has indicated the sales of buttons.

ISSUED TO: ANSWER COALITION

LOCATION: JOHN MARSHALL PARK, PENNSYLVANIA AVENUE NHS, NORTH AND SOUTH

SIDEWALKS, AND COLUMBUS PLAZA DATE: JULY 24, 2024 (5:00 AM -4:00 PM)

- R. All sound amplification equipment shall be limited so that it will not unreasonably disturb nonparticipating persons in, or in the vicinity of, the area. National Park Service has issued a Record of Determination in John Marshall Park during regular business hours, therefore no amplified sound is allowed in John Marshall Park as part of this activity.
- S. Balloons of any kind, glass containers and alcoholic beverages are not permitted.
- T. The collection of entry/registration fee is prohibited on parkland.
- U. Permittee's desiring the use of temporary structures, i.e. cable trusses, stages, audio and/or video towers and tents, whose dimensions are (500) square feet or more, shall provide Life Safety Code certification statements confirming the safety of all temporary structures. In the event that the manufacture's certifications are not available, permittee will submit to the NPS stamped engineered drawings for NPS review and approval. Smaller structures cannot be attached or within 5ft of another to create a larger structure.
- V. All activities pursuant to this permit shall be in compliance with the requirements of Title VI of the Civil Rights Act of 1964 (78 Stat. 252; 42 U.S.C. 200d ed seg.); Title V, Section 504 of the Rehabilitation Act of 1973 (87 Stat. 394; 29 U.S.C 794); the Age Discrimination Act of 1975 (89 Stat. 728; 42 U.S.C. 6101 et seg.); and with all other Federal laws and regulations prohibiting discrimination of grounds of race, color, national origin, handicap, religion, or sex in employment and in providing facilities and services to the public. Nothing advertising for employees shall be done which will prevent those covered by these laws from qualifying for employment.
- W. <u>Portable Restrooms:</u> If attendance is expected to exceed the capacity of nearby NPS public comfort facilities, or if none exist in or near the requested park area, the Permittee must provide portable, temporary toilets with sufficient capacity to accommodate anticipated attendance. The general guideline is a minimum of (1) portable toilet per (300) people, of which at least twenty percent (%20) must be handicapped accessible. The restrooms should be grouped in banks of five with a six-foot clearance between each bank.
 - 1. John Marshall Park—10 Portable Restrooms—The portable restrooms must be hand carted and retrieved for the area.
 - 2. Portable restroom trucks may not drive on sidewalk and should furnish a hose long enough to clean portable restrooms
 - 3. Portable restrooms must be delivered and removed the same day of the demonstration.
- X. <u>Tents:</u> Permittee's authorized use of temporary structures, i.e. cable trusses, stages, audio and/or video towers and tents, whose dimensions are (900) square feet or more, shall provide Life Safety Code certification statements confirming the safety of all temporary structures. In the event that the manufacture's certifications are not available, permittee will submit to the NPS stamped engineered drawings for NPS review and approval. Smaller structures cannot be attached or within 5ft of another to create a larger structure.
 - a. A minimum 10ft. clearance must be maintained from tents to any flammable or combustible materials or vegetation.

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SIDEWALKS, AND COLUMBUS PLAZA DATE: JULY 24, 2024 (5:00 AM -4:00 PM)

b. Aisle Width: The width of aisles serving seating at tables shall be not less than 44 in. where serving occupant load exceeding 50 people, and 36 in. where serving an occupant load of 49 people or fewer. In addition all tent exits must have a minimum head clearance height of 7ft.

c. Exit and Occupant Loads for Enclosed Tents: Tents that have sides attached and those with rolled up sides which are capable of being enclosed shall meet the following occupancy load and exit requirements.

Y. Occupant Load Number	Z. Floor Area	AA. Approx. Tent Sizes	BB. Min. Exits
CC.<49 people	DD. <343 Sq. Ft.	EE. 10'x10', 10'x30', 15'x15'	FF. 1
GG. 50-499 people	HH. 350-3,493 Sq. Ft.	II. 15'x 30', 40' x 40', 40' x80'	JJ. 2
KK. 500-999 people	LL. 3,500-6,993 Sq. Ft	MM. 40' x 100', 60' x 100'	NN. 3
OO. >1000 people	PP. >7,000 Sq. Ft.	QQ. 80' x 100', 60'x 160'	RR.4 or more

- SS. Tents must be supported by water barrels or cement blocks. <u>STAKING IS NOT PERMITTED.</u> In order to prevent damage to brick, stonework, or other surfaces, protective material such as plywood, carpet squares or rubber pads must be in place under all equipment, including speaker stands, lighting stands, generators, tables and tents.
- TT. **GENERATORS:** No generators have been requested at the permitted areas, therefore generators are prohibitied.
- UU. Contact Park Ranger Marisa Richardson, National Park Service, at (202) 245-4715, with questions or to discuss additional information regarding logistical setup.
- VV. Contact Lt. Timothy Van Dyke, United States Park Police, 202-426-6710, with questions concerning police procedures or logistics.

WW. NPS and USPP onsite representatives

- a. Marisa Richardson 202-528-9610
- b. Martin Torres 202-603-9499
- c. Tim Van Dyke 202- 202-768-1912
- XX. In case of an emergency, please contact USPP dispatch at (202) 610-7500.

A complete and legible copy of this permit must be retained on-site by the Permittee at all times while operating under the authority granted.

ISSUED TO: ANSWER COALITION

LOCATION: JOHN MARSHALL PARK, PENNSYLVANIA AVENUE NHS, NORTH AND SOUTH

SIDEWALKS, AND COLUMBUS PLAZA DATE: JULY 24, 2024 (5:00 AM -4:00 PM)

General Resource Protection:

- YY. Pursuant to 36 CFR 7.96(g)(xii), the alteration, damage, or removal of park resources or facilities is prohibited. No holes may be dug and no item, including signs or banners, may be attached to park trees, plantings, benches, fences, light standards, or any other park landscape element.
- ZZ. It is prohibited to climb, remove, or in any way injure any statue seat, wall, fountain, light poles, elevator towers, or other erection or architectural feature, or any tree, shrub, or landscaping feature within the park. Permittee is responsible for informing event participants and providing marshals to ensure compliance with this permit condition.
- AAA. Public Access: Sidewalks and entrances seven feet wide or larger, a six foot minimum clearance must be maintained at all times to allow for two wheelchairs to pass each other. And for sidewalks and entrances of (5-6) feet wide, a four-foot minimum width must be maintained at all times for wheel chair accessibility.
- BBB. In order to prevent damage to brick, stonework, or other surfaces, protective material such as plywood or rubber pads must be in place under all equipment, including speaker stands, lighting stands, generators, tables and tents.
- CCC. Helium inflated items and drones are not permitted on Parkland.
- DDD. <u>Trash/debris pickup</u>: Permittee indicated to be responsible for all trash and debris from the permitted areas immediately after the conclusion of the demonstration. Trash receptacles for this effort shall be provided and removed from the site accordingly by the permit holder. Trash receptacles must not overflow with trash or debris. Use of clear trash bags is required for all trash receptacles used for the event.
- EEE. <u>Fire Hydrants:</u> A minimum 36 in. of clear space shall be maintained to permit access to and operation of fire protection equipment, fire department inlet connections, or fire protection system control valves. Vehicles must maintain a 15 ft. clearance of all fire hydrants.
- FFF. **Outdoor Equipment. (A) Wet Locations.** All switches, circuit breakers, receptacles, control equipment, and metering devices located in wet locations shall be weatherproof. **(NFPA70:551.78 (2017)**
- GGG.OPEN-FLAME DEVICES. Open-flame decorative devices, candles, oil lamps, decorative torches and gas lights are NOT authorized in any tent or temporary structures.
- HHH.COMBUSTIBLE OR FLAMMABLE LIQUIDS shall NOT be stored on NPS property. NCA-AHJ
- III. Weather (adverse) Policy during an Event Program: When there is a threat to public health or safety, the Superintendent and/or designee, may close the National Mall or an event being hold there for such duration as determined necessary to ensure the safety and well being of the public. Such situations have occasionally occurred in the past where park areas have been closed due to severe weather warning of heavy snow, thunderstorms with lighting, high winds, cold and intense heat. Where an area is ordered closed due to a weather-related public safety threat, pursuant to 36 CFR

ISSUED TO: ANSWER COALITION

LOCATION: JOHN MARSHALL PARK, PENNSYLVANIA AVENUE NHS, NORTH AND SOUTH

SIDEWALKS, AND COLUMBUS PLAZA DATE: JULY 24, 2024 (5:00 AM -4:00 PM)

2.32 people must comply with official directions to leave the closed area and relocate to safer sheltered locations. Weather will be monitored throughout the duration of the event. Permittee is responsible for ensuring that adequate resources are available to deal with extreme weather conditions. For example extreme heat, cold, snow etc. Permittee is responsible for removing snow from flooring, however the Park Superintendent must approve type equipment used or any deicer.

ISSUED TO: ANSWER COALITION

LOCATION: JOHN MARSHALL PARK, PENNSYLVANIA AVENUE NHS, NORTH AND SOUTH

SIDEWALKS, AND COLUMBUS PLAZA DATE: JULY 24, 2024 (5:00 AM -4:00 PM)

3. All laws, rules and regulations applicable to the area covered by this permit remain in effect.

- 4. No fee may be collected, donation solicited, or commercial activity conducted. No items may be sold or offered for sale except for books, newspapers, leaflets, pamphlets, buttons and bumper stickers which contain a message related to your demonstration or special event. No other merchandise may be sold or offered for sale. A stand or structure used for the sale of permitted items may not exceed one table per site, which may be no larger than 2 1/2 feet by 8 feet or 4 feet by 4 feet. The dimensions of the sales site may not exceed 6 feet wide by 15 feet long by 6 feet high.
- 5. The area should be left in substantially the same condition as it was prior to the activities authorized herein, and all litter shall be placed in the trash containers provided.
- 6. This permit is applicable only for the use of the area designated above, and during the times designated above, or in any area as may hereafter be designated by the United States Park Police.
- 7. All sound amplification equipment shall be limited so that it will not unreasonably disturb nonparticipating persons in, or in the vicinity of, the area.
- 8. The National Park Service reserves the right to immediately revoke this permit at any time should it reasonably appear that the public gathering presents a clear and present danger to the public safety, good order or health, or if any conditions of this permit are violated.

<u>Lisa Mendelson</u>

Regional Director

National Capital Region

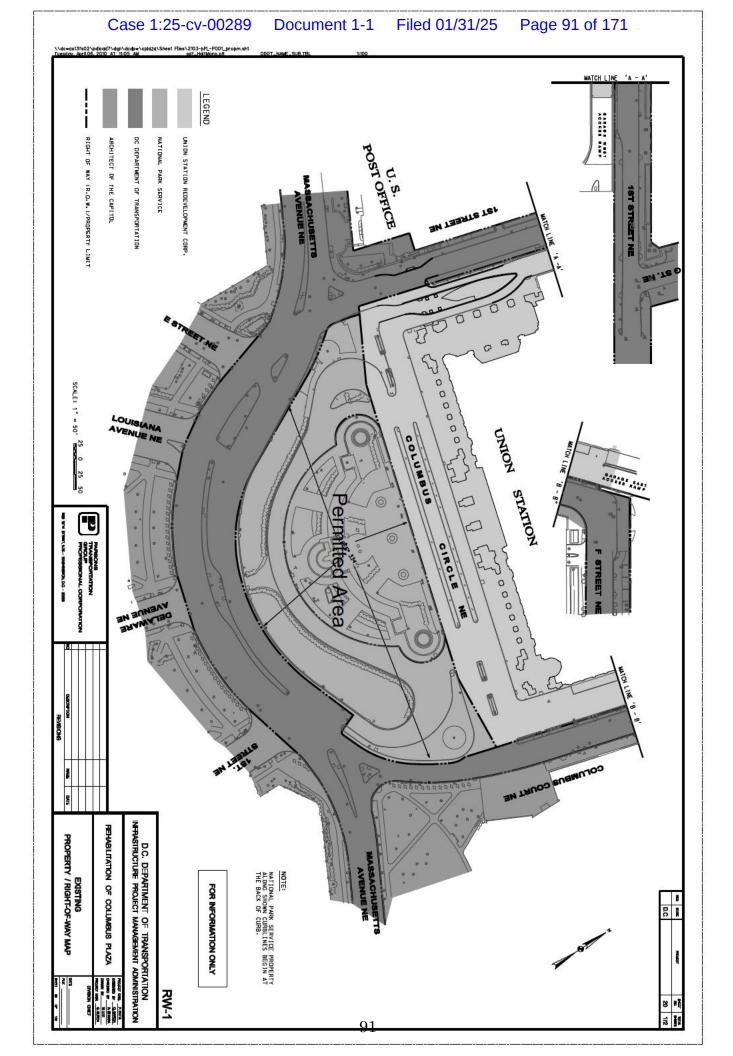
By:

Marisa E. Richardson

Chief, Division of Permits Management

National Mall and Memorial Parks

Page 90 of 171 Case 1:25-cv-00289 Filed 01/31/25 Document 1-1 NATIONAL HISTORIC PARK Information Restrooms SHEET 3 OF 3
NATIONAL CAPITAL PARKS - CENTRAL
NATIONAL PARK SERVICE
WASHINGTON, DC PENNSYLVANIA AVENUE Metrorail Entrance Railroad Building Statue Visitor Water 3rd Street [™] Pennsylvania Avenue DATE: 4/4/2002 Õ Not Permitted National Gallery of Art North **US Distict** Court **East Building** Madison Drive 0 Permitted area Meters Permitted Area Second NHS
Sidewalks Chessn 9 Feet C Street o Marshall 300 4th Street Not NPS Jurisdiction 8 20 Canadian Embassy 9 50 0 100 \Box Mellon National Gallery of Art West Building 6th Street Constitution Avenue Federal Trade Commission ī





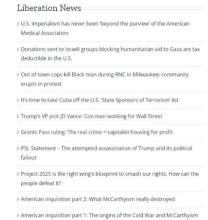










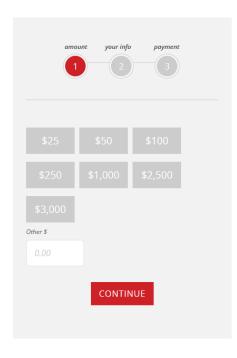






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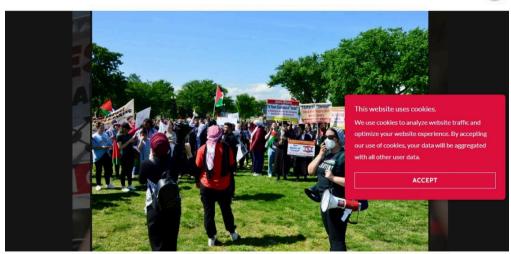


WHO WE ARE

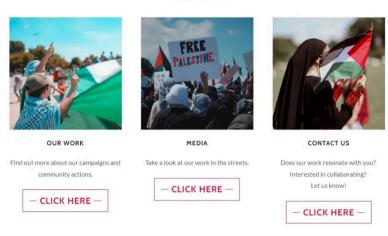
a grassroots Palestinian-led organization in the DMV building towards a free Palestine

- INTEREST FORM -

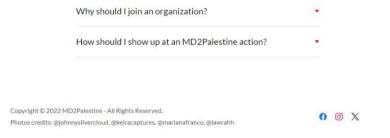


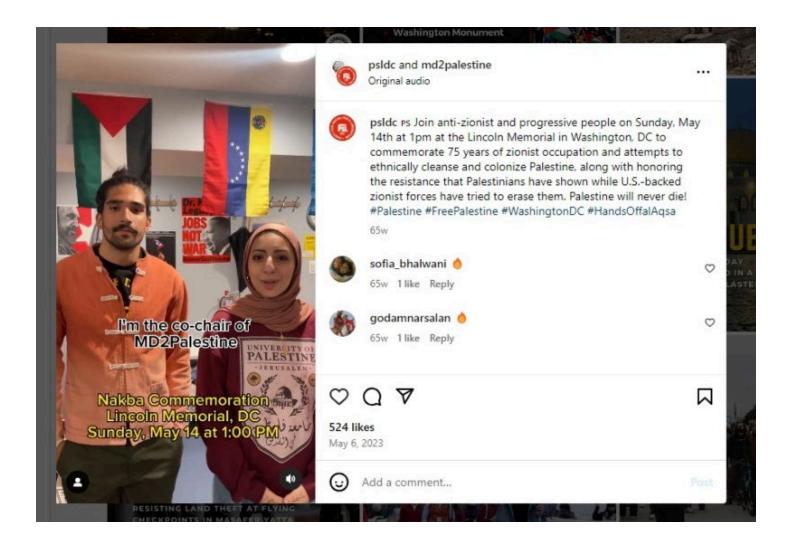


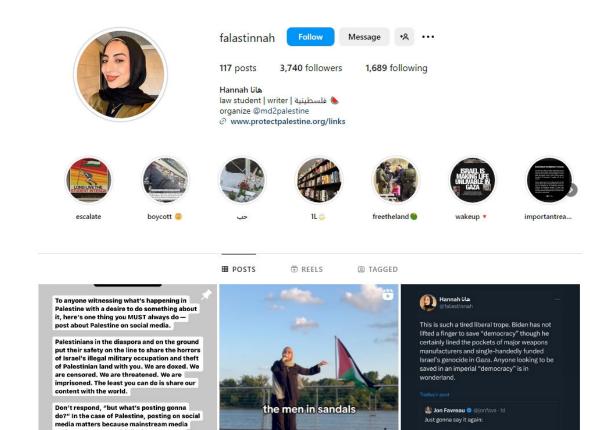
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FREQUENTLY ASKED QUESTIONS



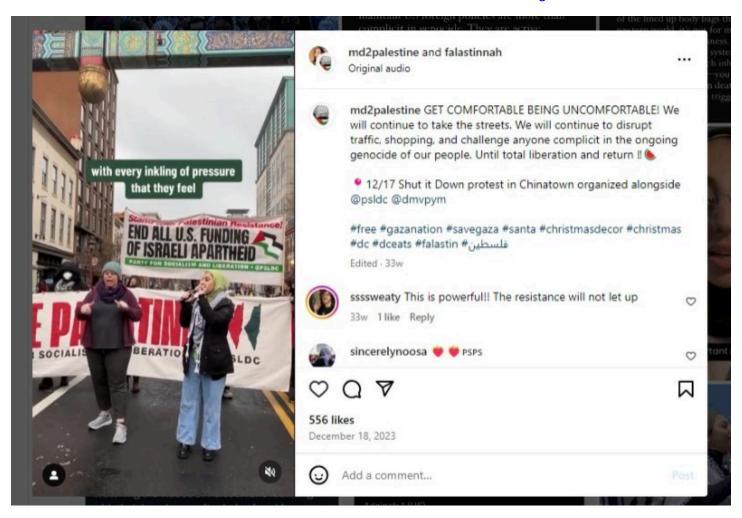


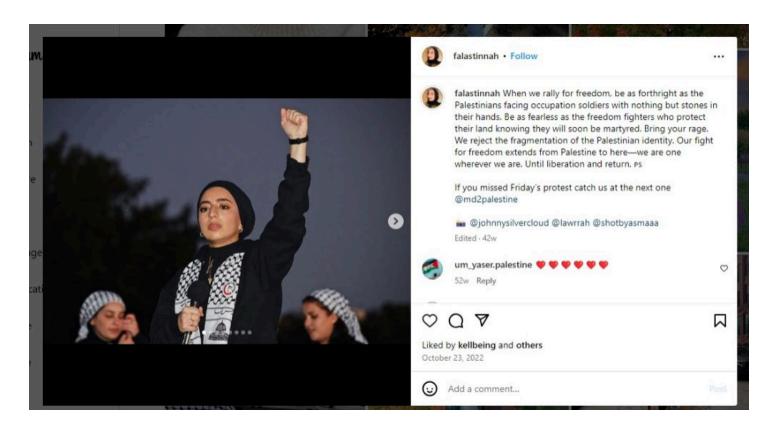


Hove Joe Biden. He saved democracy in 2020. His legislative record is the arguably the most consequential of any modern presid... Mostrar más

Instagram

outlets refuse to truthfully document our stories. Social media is our window to revealing raw footage and truth.







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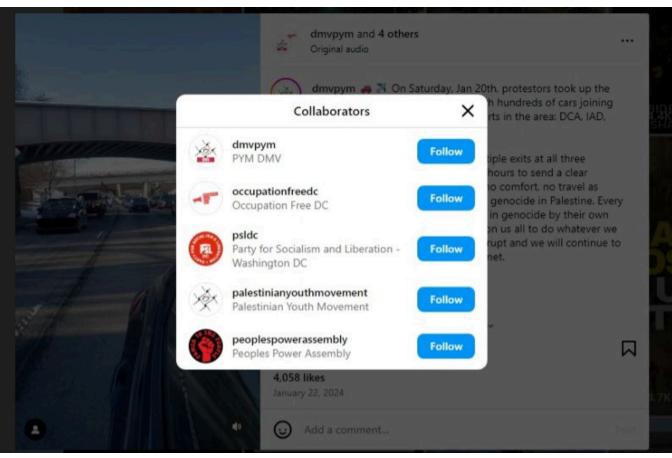
Last Friday, @umd_sjp invited MD2Palestine and other guest speakers to discuss Palestine advocacy! MD2Palestine spoke on building a grassroots organization from the ground up, along with the challenges and triumphs we've faced in our organizing thus far.

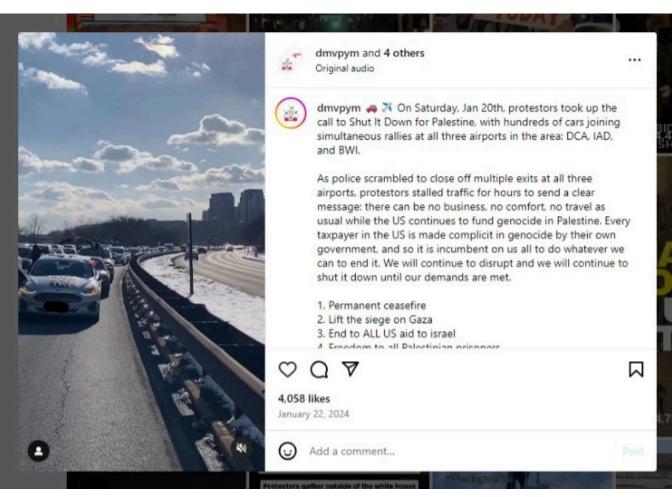
#freepalestine ==

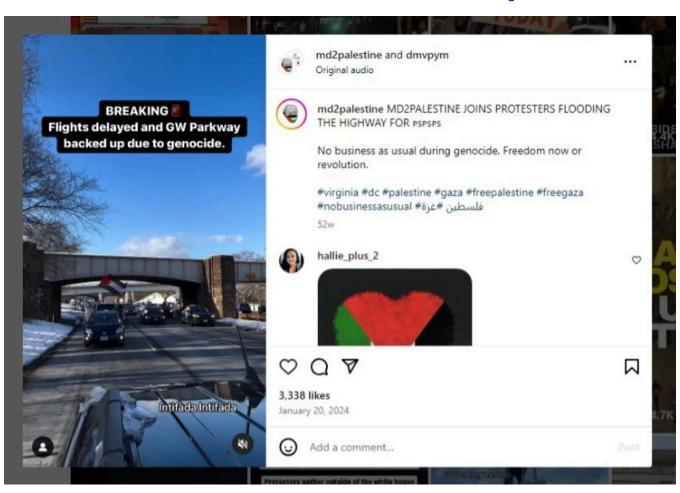




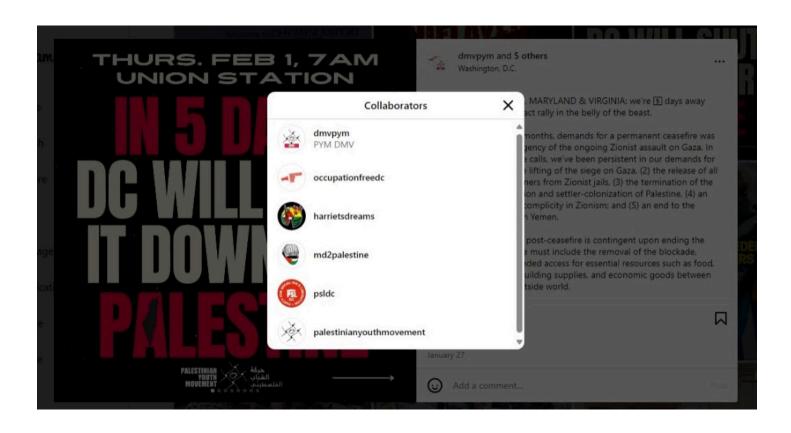
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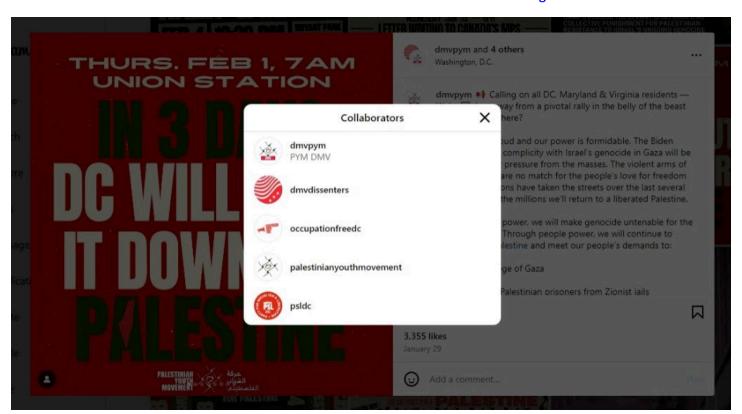




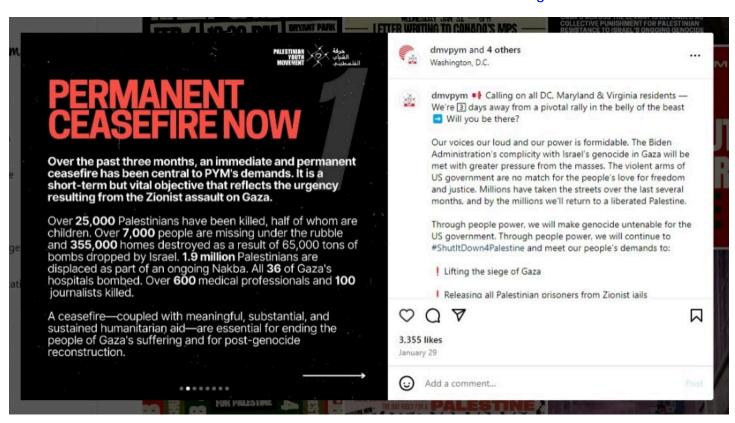


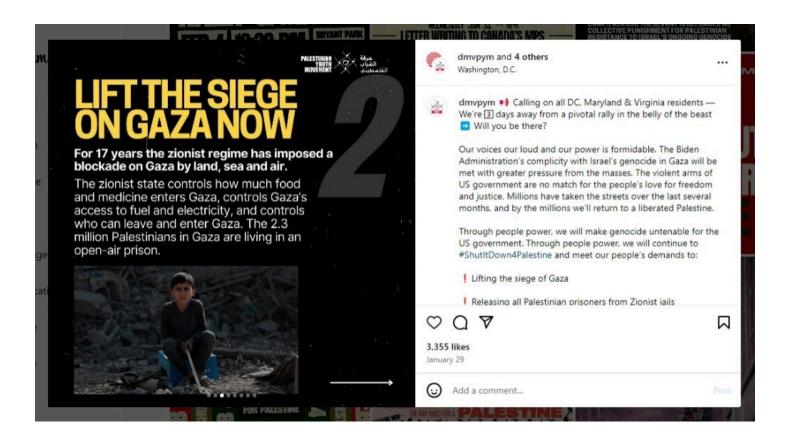


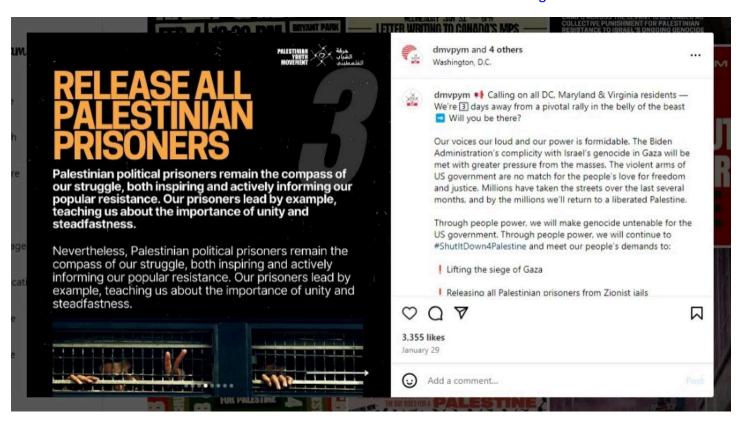


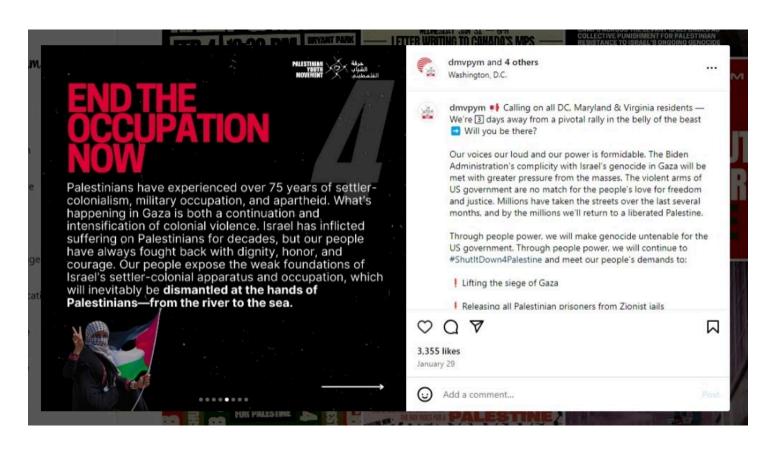


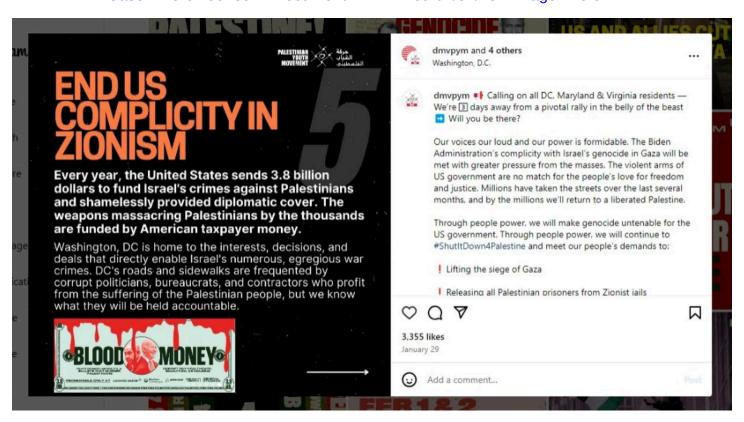


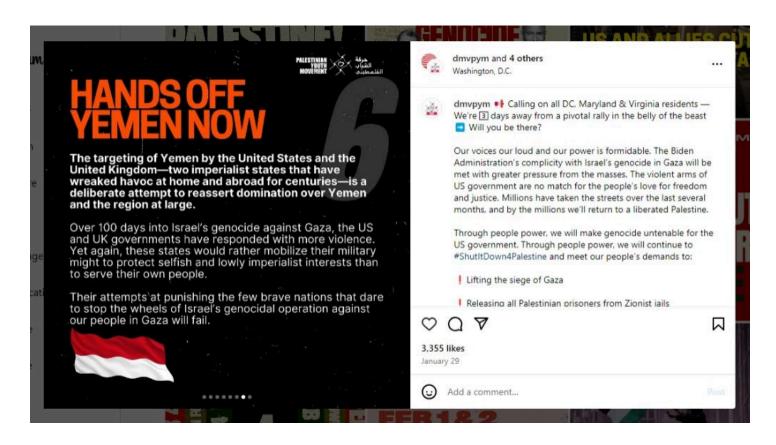


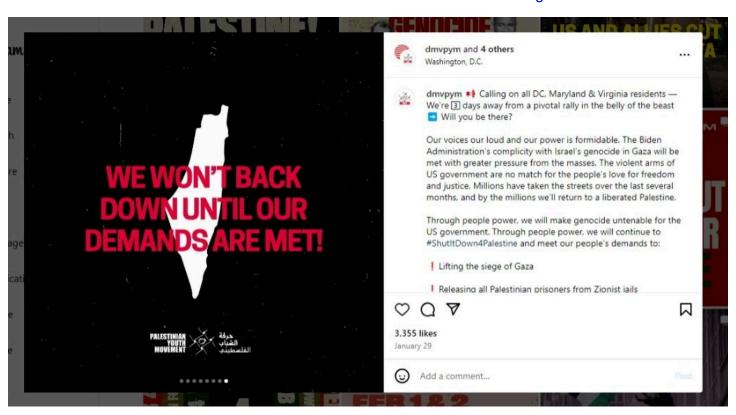


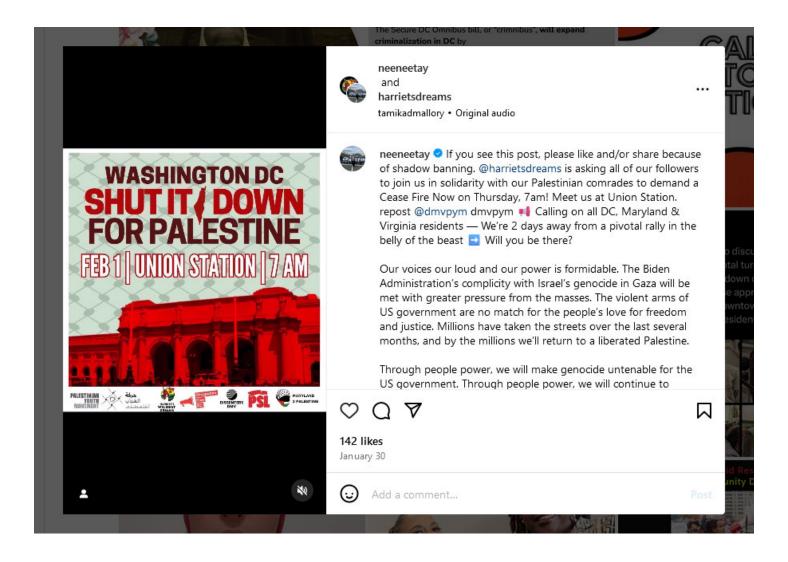


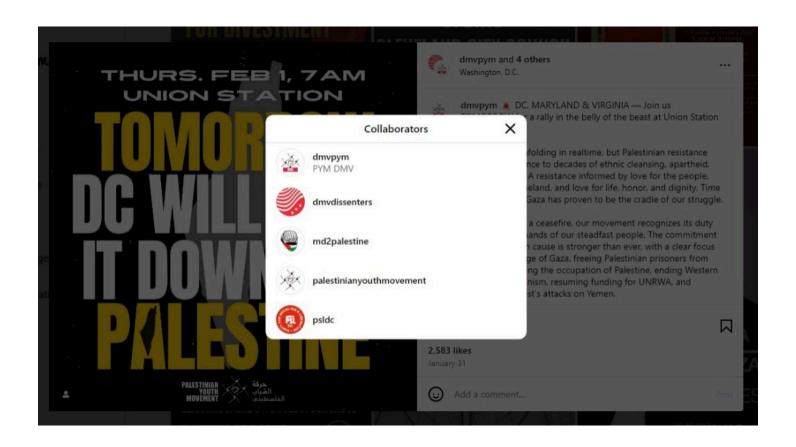


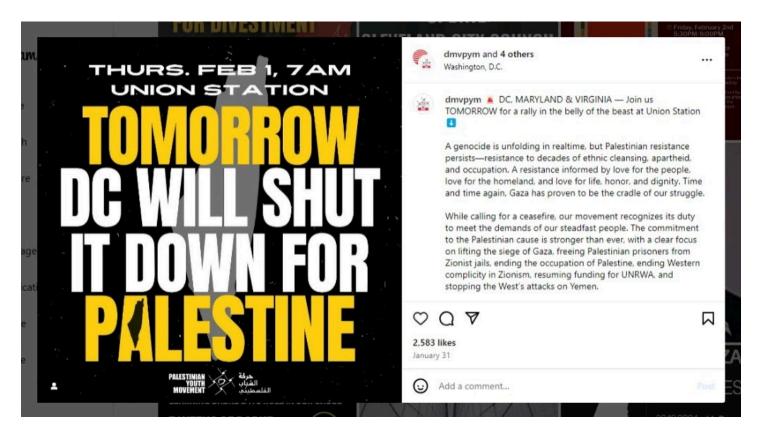


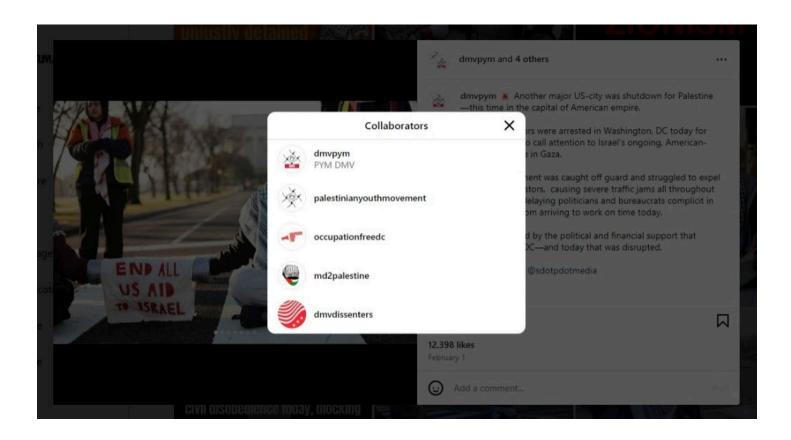


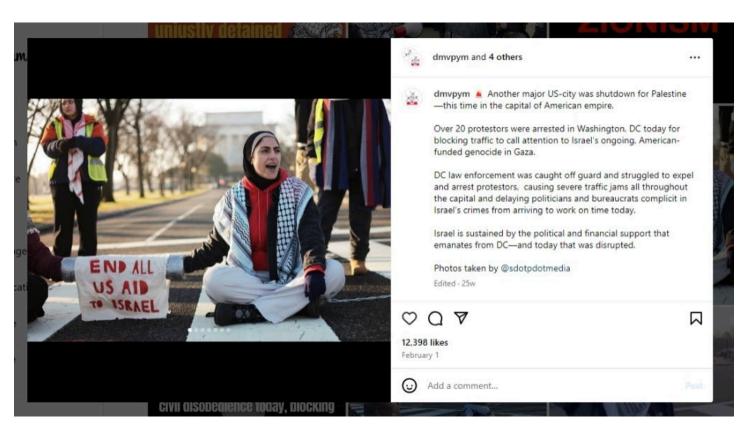


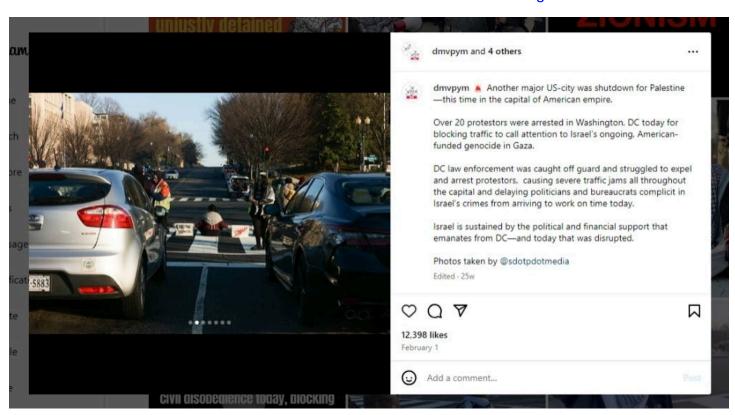


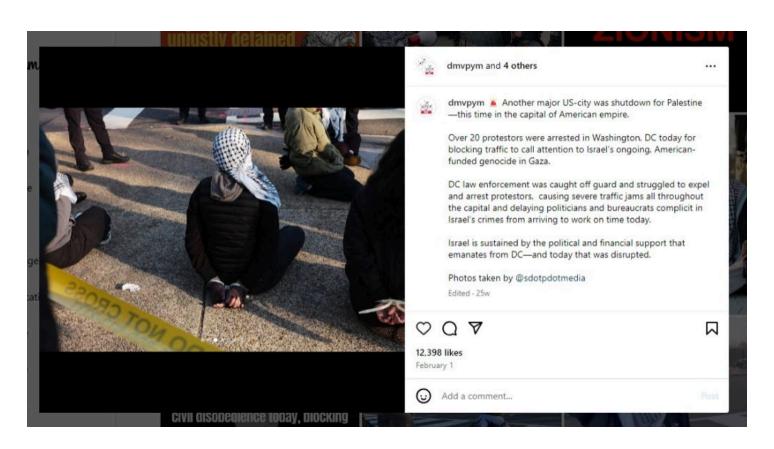


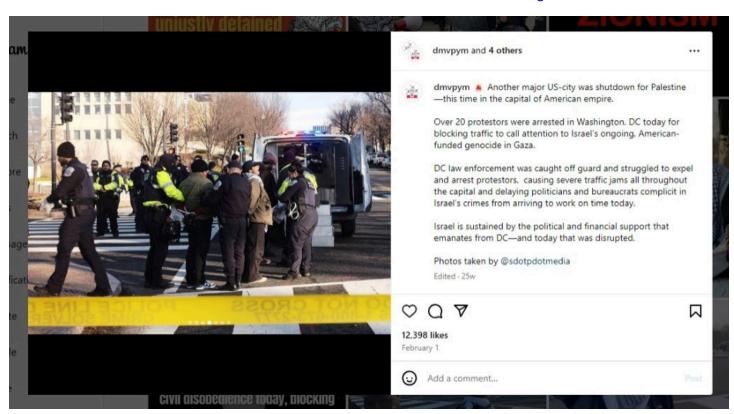


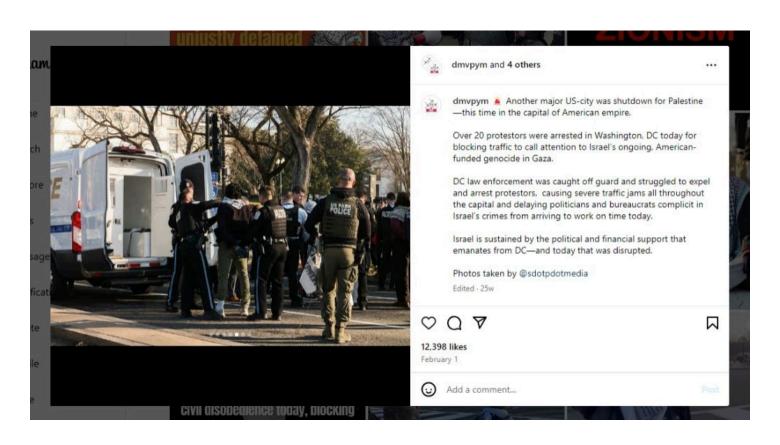


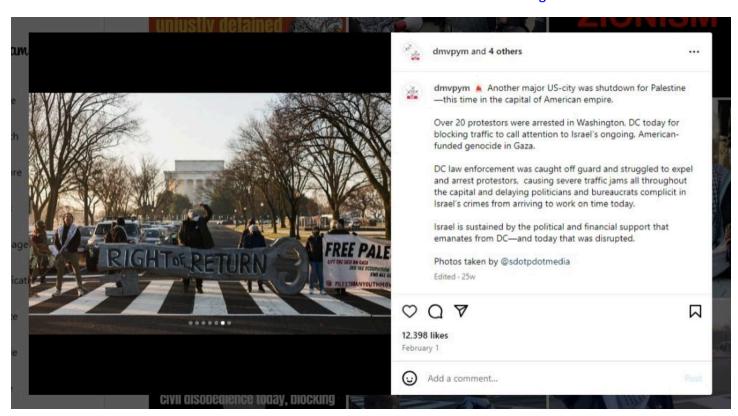


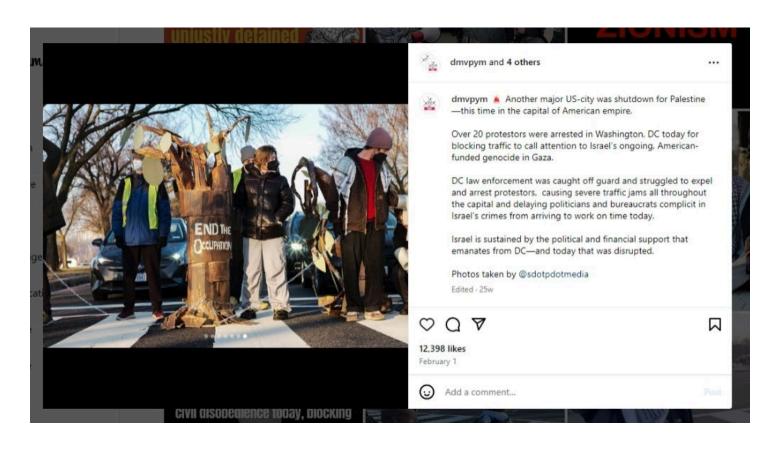


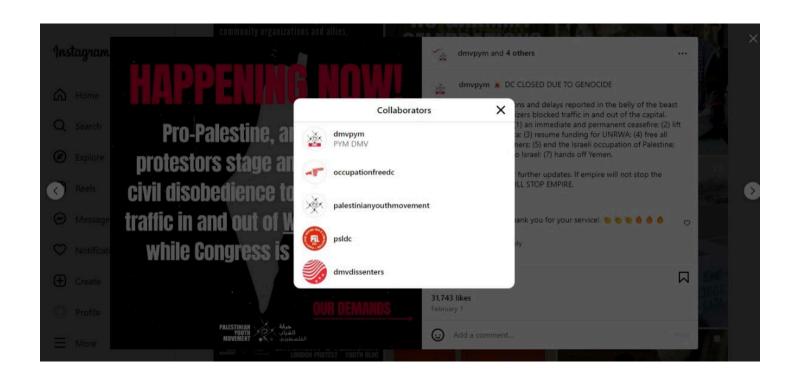


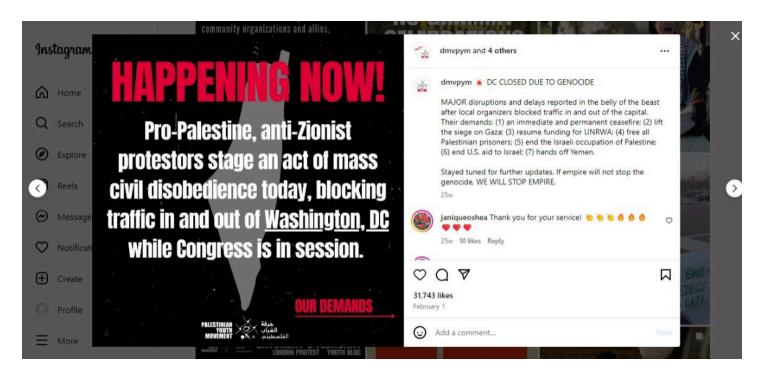


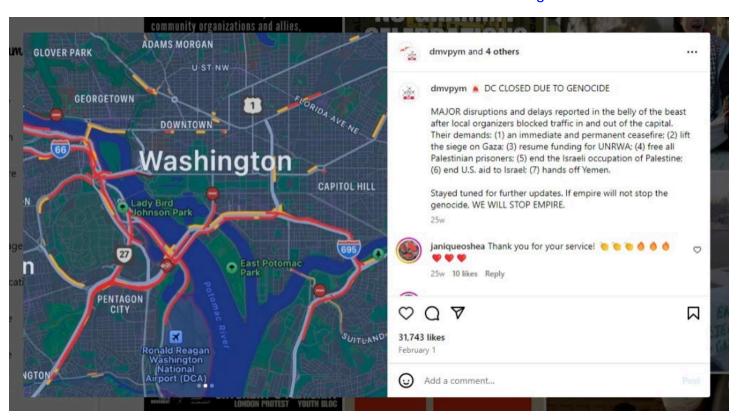




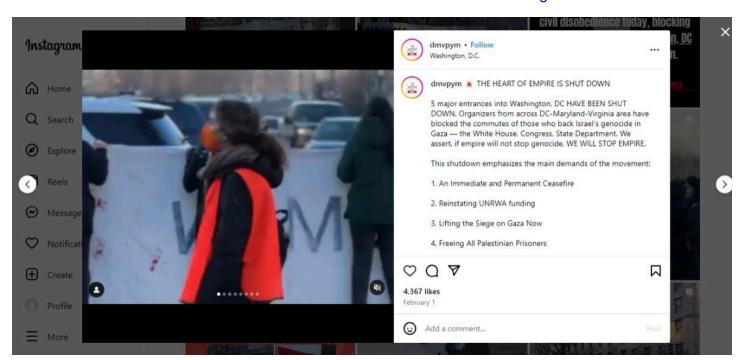




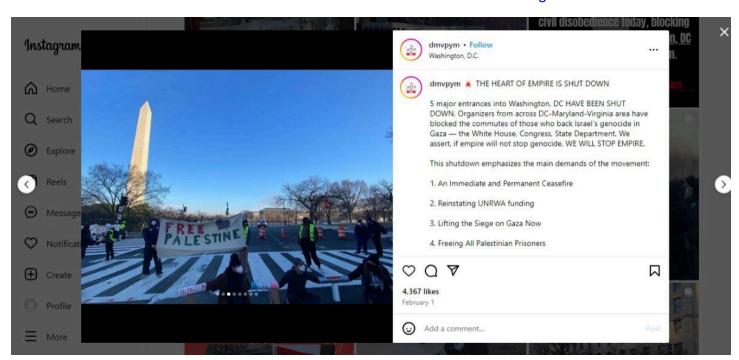




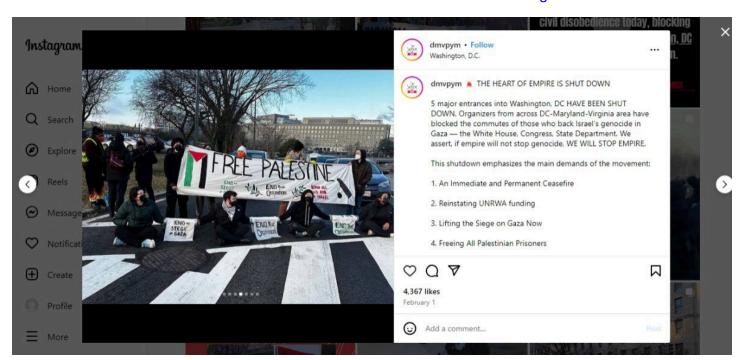


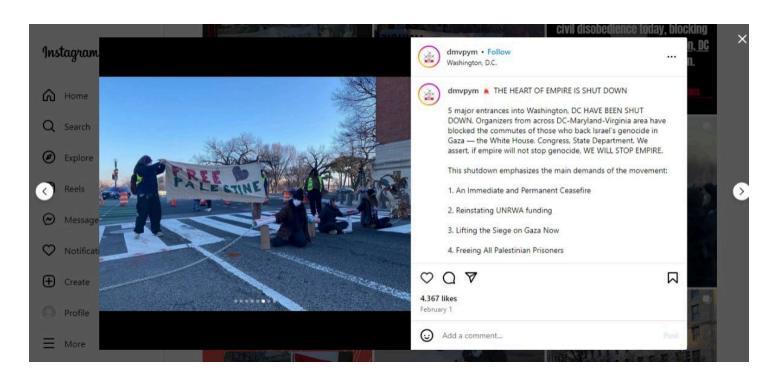


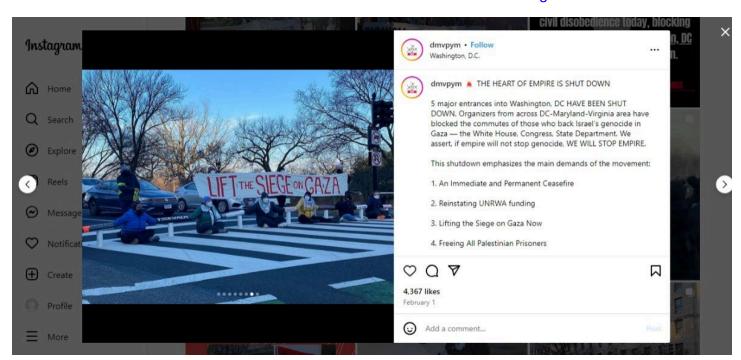


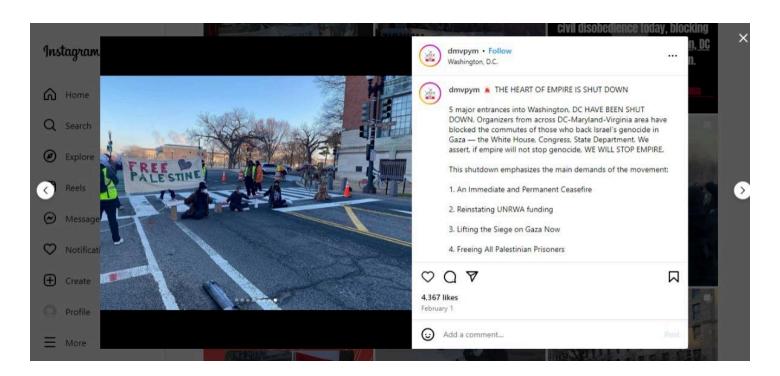


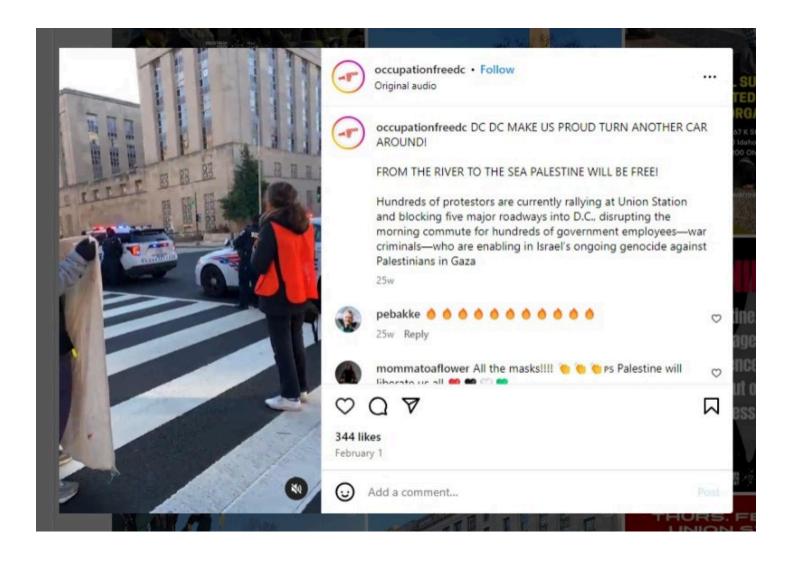


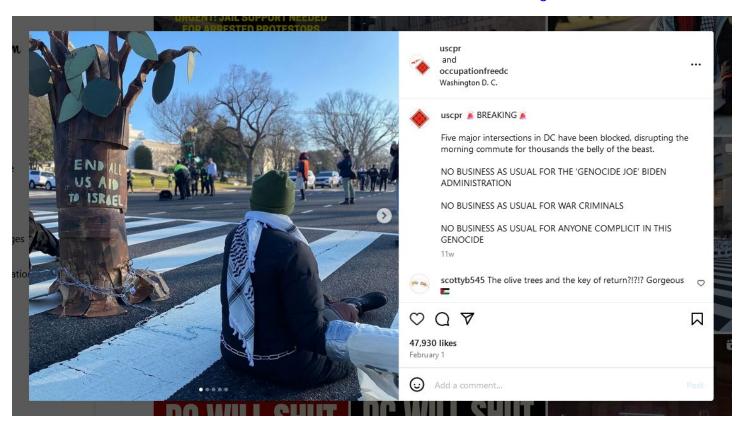




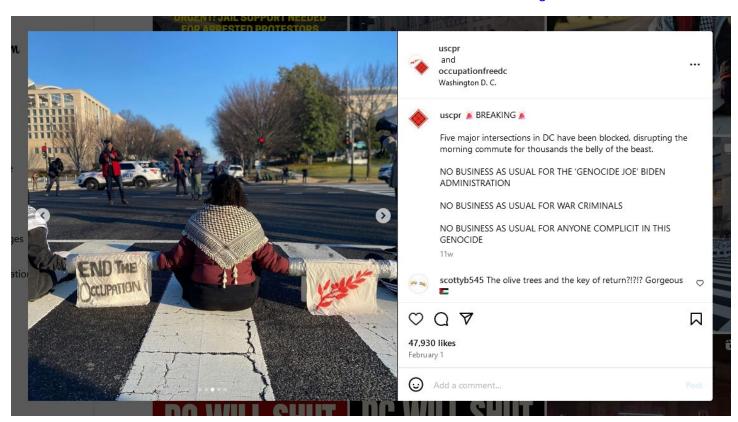


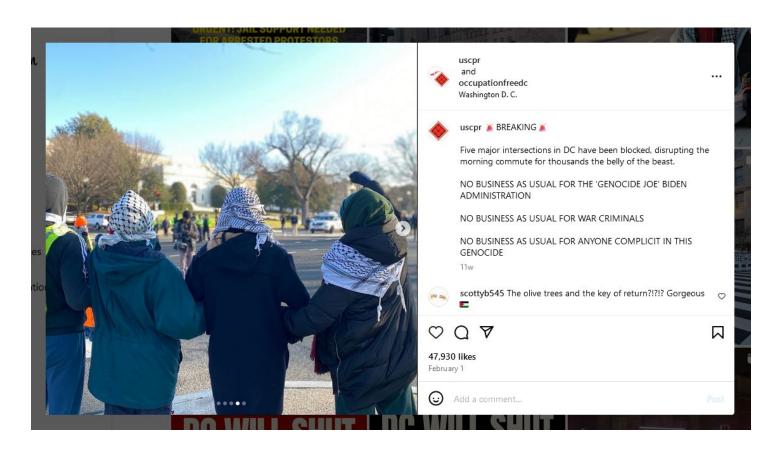


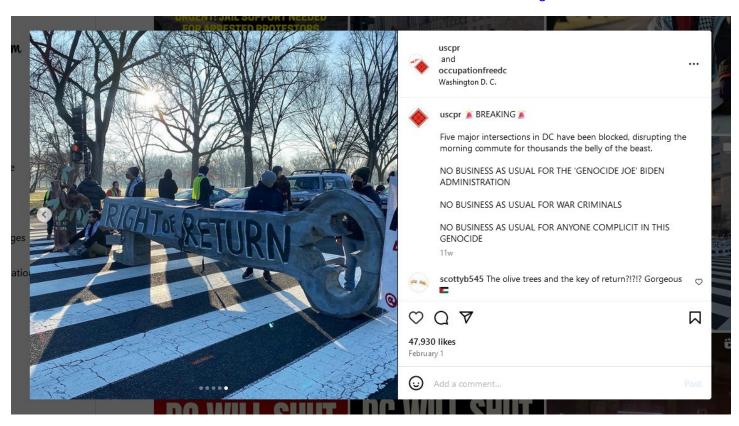


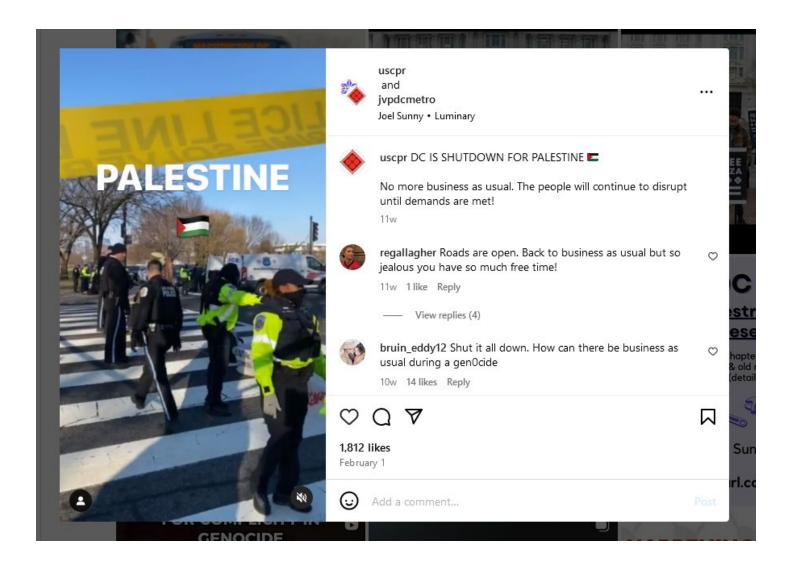




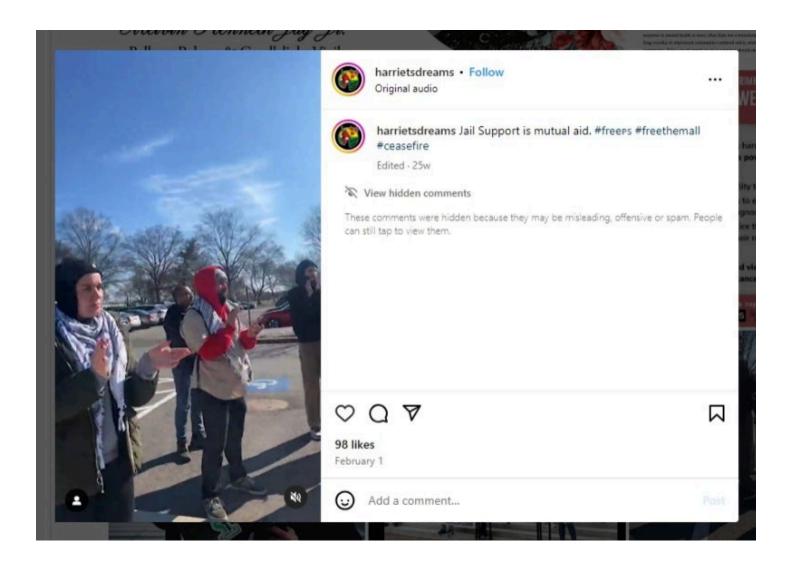




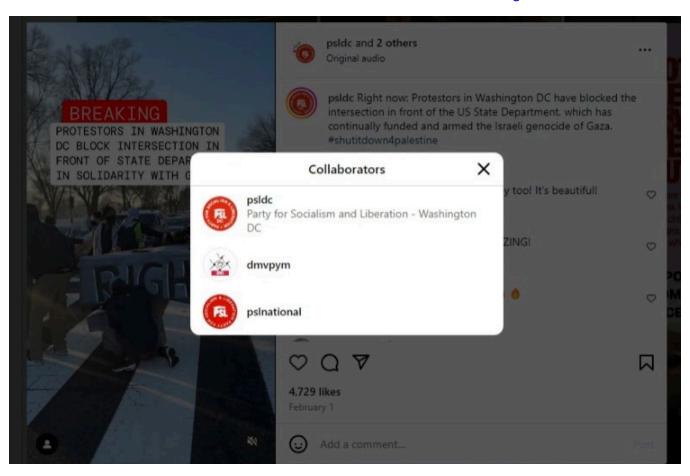


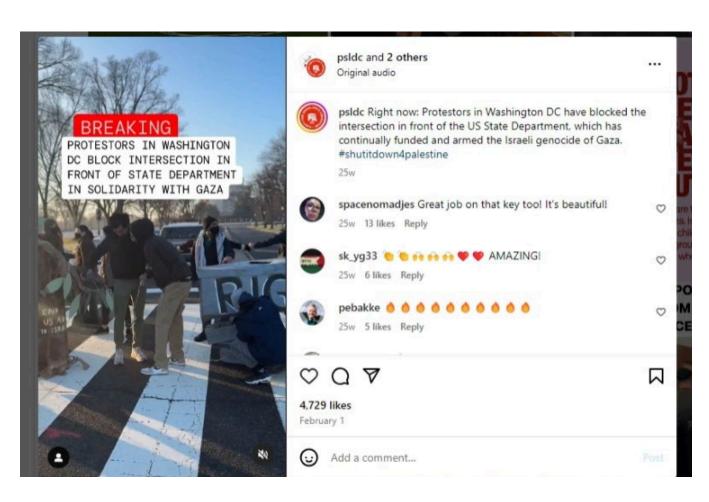


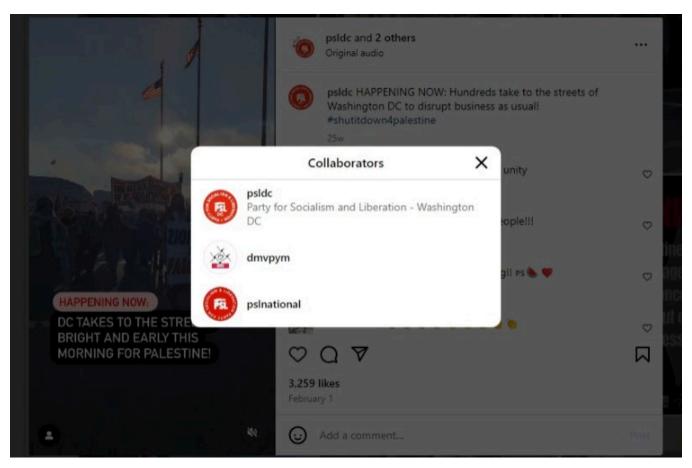


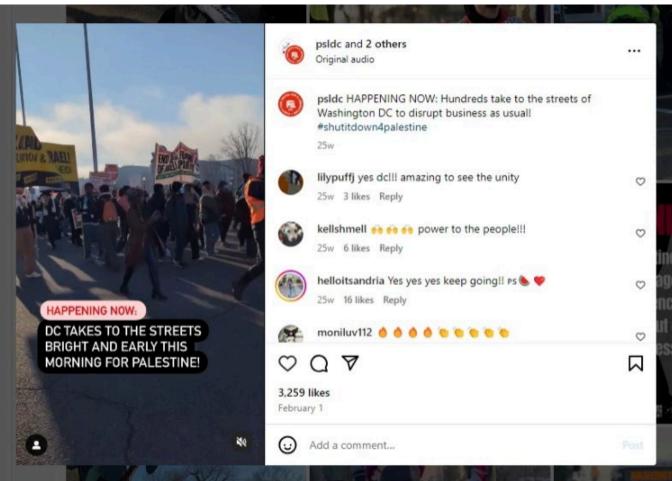


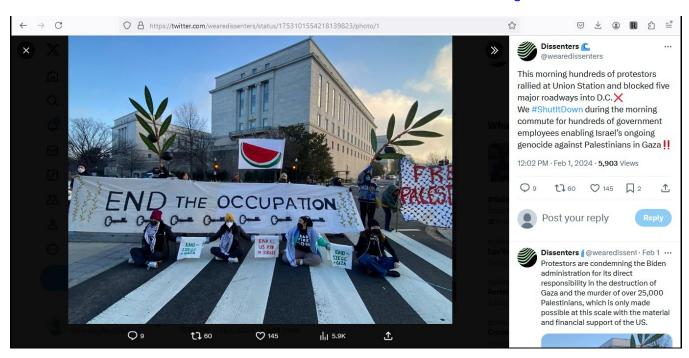
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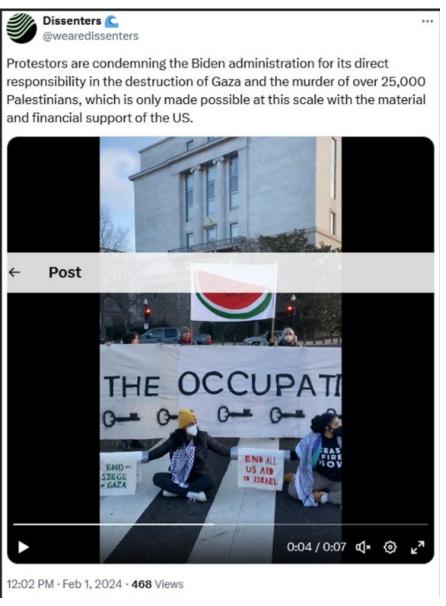


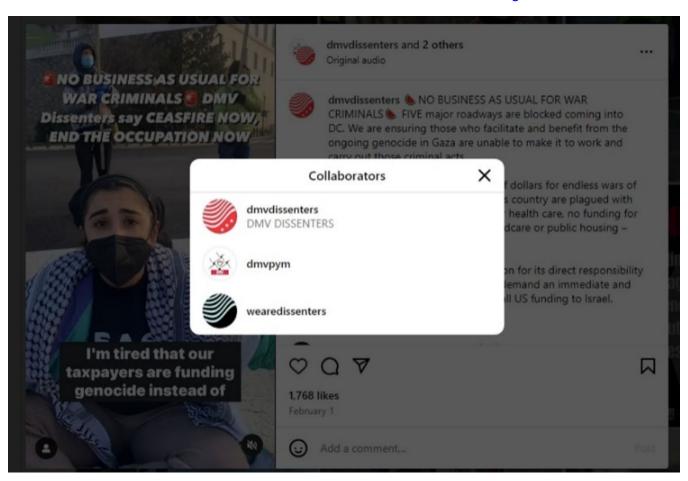


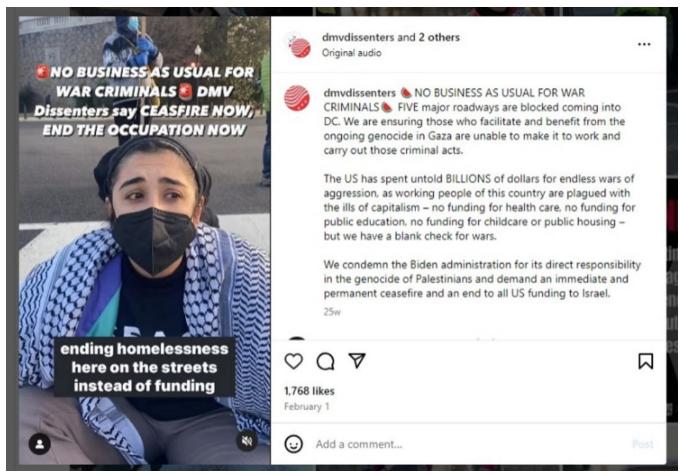


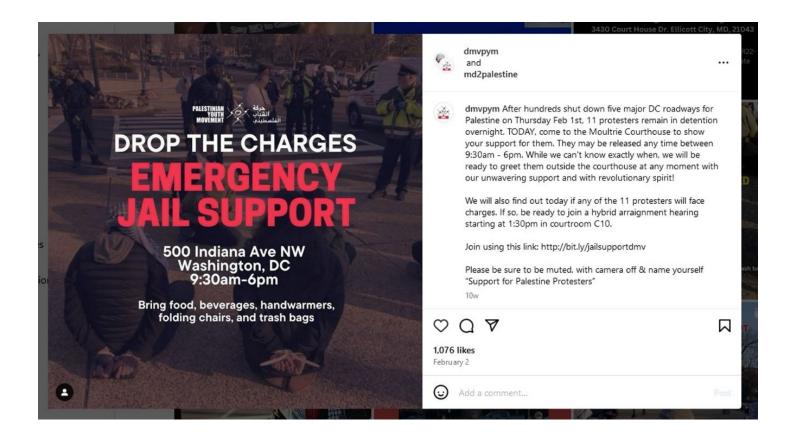


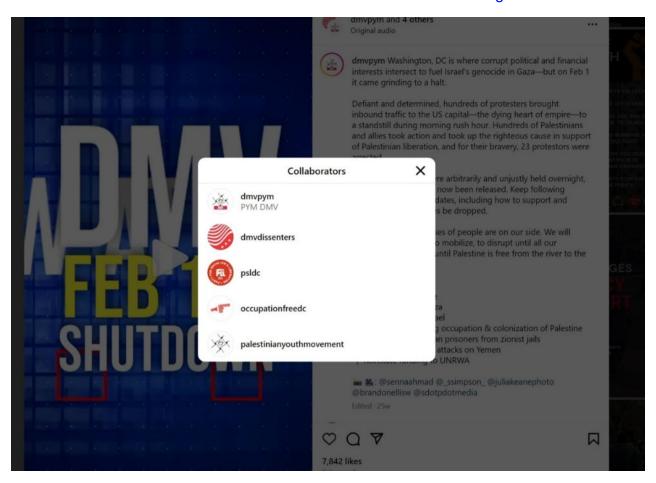




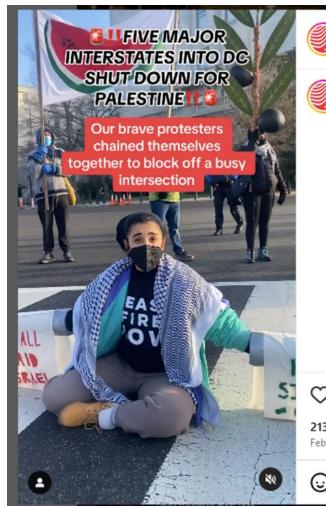
















dmvdissenters Last week DMV Dissenters joined @dmvpym @md2palestine @psldc @shutdowndc_ @occupationfreedc @jvpdcmetro and others to SHUT DC DOWN. 🌭 💗

Our brave comrades held this intersection for two and a half hours to disrupt business as usual for the war criminals working in so-called Congress aiding and abetting Israel's genocide of the Palestinian people.

We will not stop until our demands are met:

- 1. A permanent ceasefire;
- 2. An immediate reinstatement of funding for UNRWA;
- 3. An immediate end to the 16-year siege on Gaza;
- 4. An end to all U.S. aid to Israel;
- 5. Freedom to all Palestinian political prisoners;
- 6. An end to 76 years of Zionist occupation.
- 7. Hands off Yemen

This week the House tried to send \$18 BILLION more to Israel









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