

# EXHIBIT A

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9 Understanding of Anti-Palestinian  
10 Racism and Dr. Shirin Zarqa-Lederman

11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA

13 ANDREA PRITCHETT, et al.,

14 Plaintiffs,

15 v.

16 GAVIN NEWSOM, et al.,

17 Defendants.

Case No. 5:25-cv-09443-NW

**THE INSTITUTE FOR THE  
UNDERSTANDING OF ANTI-  
PALESTINIAN RACISM'S AND DR.  
SHIRIN ZARQA-LEDERMAN'S  
AMICUS CURIAE BRIEF IN SUPPORT  
OF PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION**

Judge: Honorable Noël Wise  
Ctrm: 3, 5th Floor

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**I. INTRODUCTION**

The amici who author this brief are community psychologists, practitioners and academics whose work centers on Palestinian American youth, and similar populations of students in diaspora from Middle Eastern, Arab, and Muslim refugee communities. These students are never mentioned in California Assembly Bill 715 (AB 715), but the impacts of the law have already hurt them. California’s Palestinian students face a pre-existing pattern of anti-Palestinian racism and exclusion where their identities are pathologized, surveilled, erased, and subjugated in schools. Amici describe how anti-Palestinian discrimination in California schools is evident in empirical data and in the lived experience of Palestinian American students. AB 715 purports to address discrimination but instead codifies the pre-existing patterns of anti-Palestinian racism by establishing a system of structural exclusion endorsed by the State of California.

**II. INTERESTS OF AMICI<sup>1</sup>**

Dr. Shirin Zarqa-Lederman is a community psychologist whose work centers on trauma, displacement, diaspora identity, and structural violence, specifically among Palestinian communities globally, and in the United States. Her career has been devoted to supporting marginalized families navigating community spaces including educational systems that often misunderstand or pathologize them. As a Palestinian American, she brings a culturally grounded understanding of how school environments shape the daily realities of Palestinian children and the unique forms of harm they experience when their identity is rendered controversial, politicized, or invisible.

Dr. Jess Ghannam is a co-founder of the Institute for the Understanding of Anti-Palestinian Racism, and an internationally acclaimed professor, educator, researcher, and clinician. His research evaluates the long-term health consequences of war on displaced communities and the psychological and psychiatric effects of armed conflict on children. Dr. Ghannam has developed community health clinics in the Middle East and Arab World that focus

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<sup>1</sup> No party or party’s counsel authored this brief in whole or in part, or contributed money that was intended to fund preparing or submitting the brief. No person, other than *amici curiae* or their counsel, contributed money intended to fund preparing or submitting this brief.

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1 on developing community-based treatment programs for families and children in crisis.

2 The Institute for the Understanding of Anti-Palestinian Racism (IUAPR) consists of  
3 researchers, physicians, psychologists, and legal, anti-racist and communication experts who are  
4 committed to empirical research, education and advocacy on the impacts of anti-Palestinian  
5 racism on individuals and communities across all sectors of society. Their mission is to end  
6 racism against Palestinians and their allies including advocates for Palestinian rights and  
7 freedom.

8 The interests of amici are to ensure that community-based perspectives, particularly those  
9 from groups left unnamed in AB 715, are visible to the Court. Amici are alarmed at the  
10 substantial health effects caused by anti-Palestinian racism in schools, evident in both empirical  
11 data and accounts of Palestinian American school children.

12 **III. SUMMARY OF ARGUMENT**

13 AB 715 purports to address discrimination but instead codifies the pre-existing patterns  
14 of anti-Palestinian racism by establishing a system of structural exclusion endorsed by the State  
15 of California. By centering antisemitism as the singular urgent concern and remaining silent  
16 about anti-Palestinian, anti-Arab, and anti-Muslim discrimination, the statute builds a hierarchy  
17 of whose identity deserves safety. In public education, leaving an entire group outside the  
18 categories of recognized harm functions the same way explicit exclusion does, signaling that  
19 these students fall outside of the State’s concern. In community psychology, this is the blueprint  
20 of structural discrimination; harm produced not through overt hostility but through selective  
21 naming and institutional silence.

22 But AB 715 does more than just exclude Palestinians, Arabs, and Muslims. By adopting a  
23 framework that in practice labels speech supporting Palestinian rights, dignity, and freedom as  
24 potentially antisemitic, it causes the exact type of discriminatory harm it purports to prevent.  
25 Because it seeks to codify existing practices that are harmful to one identity group in the name of  
26 ameliorating harm to another identity group, AB 715 is structurally discriminatory.

27 The lived experiences of Palestinian American students in California shows a pattern of  
28 harm due to rampant anti-Palestinian racism in our school systems. In preparing this brief, Dr.

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1 Zarqa-Lederman held approximately fifteen semi-structured conversations with Palestinian  
2 students, their parents, and educators across California including Alameda, Humboldt, Santa  
3 Clara, San Mateo, and Los Angeles counties. They are accounts shared directly by community  
4 members that reveal how Palestinian identity is interpreted, disciplined, and erased within  
5 California schools. She includes them here because the same themes appeared again and again,  
6 across roles, ages, gender and districts. Their consistency reflects how AB 715 functions on the  
7 ground even before its official implementation.

8 In an empirical study conducted by the Institute for the Understanding of Anti-Palestinian  
9 Racism<sup>2</sup>, a staggering 88% of more than 1,200 survey respondents reported experiencing or  
10 witnessing anti-Palestinian racism. Anti-Palestinian racism affects both Palestinians (27%) and  
11 non-Palestinians (73%). *Distinct from Islamophobia, 58% of the respondents were Christian,*  
12 *Jewish, Buddhist, Hindu, no religion or other religions.* Notably, 75% of respondents reported  
13 feeling isolated and alone. In addition, 55% reported feeling afraid. The results confirmed  
14 substantial impacts on the people in our schools: 74% of the students, faculty, teachers and  
15 education administrators reported experiencing anti-Palestinian racism, while 66% experienced it  
16 from faculty, teachers or administrators. More than 75% of students, faculty, teachers and  
17 education administrators reported mental and physical health effects from anti-Palestinian  
18 racism.

19 In light of rampant anti-Palestinian discrimination, amici respectfully request that the  
20 Court grant Plaintiff’s motion for a preliminary injunction to enjoin the State of California from  
21 enforcing AB 715 to avoid adopting an official system of anti-Palestinian exclusion.

22 //

23 //

24 \_\_\_\_\_  
25 <sup>2</sup> Anti-Palestinian Racism Research Grp. & Arab Canadian Lawyers Ass'n, Preliminary Report:  
26 Anti-Palestinian Racism Survey (Lama Rimawi et al. eds., Apr. 18, 2024),  
27 [https://antipalestinianracism.org/wp-content/uploads/2024/08/Anti-Palestinian-Racism-Survey-  
28 Preliminary-Report-Findings-2024.pdf](https://antipalestinianracism.org/wp-content/uploads/2024/08/Anti-Palestinian-Racism-Survey-Preliminary-Report-Findings-2024.pdf); Inst. for the Understanding of Anti-Palestinian Racism &  
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1 **IV. ARGUMENT**

2 **A. AB 715 CREATES STRUCTURAL DISCRIMINATION THROUGH**  
 3 **SELECTIVE NAMING AND OMISSION**

4 While AB 715 frames antisemitism as an isolated crisis, national data show that anti-  
 5 Muslim, anti-Arab, and anti-Palestinian harm rose at the exact same time and for the same  
 6 reasons. In 2023, the Anti-Defamation League, recorded 8,873 antisemitic incidents<sup>3</sup> (employing  
 7 a compromised methodology<sup>4</sup> that counts criticism of Israel as antisemitism). In that same year,  
 8 the Council on American Islamic Relations documented 8,061 complaints involving anti Muslim  
 9 and anti-Arab bias, many of which specifically targeted Palestinians or people perceived to be  
 10 Palestinian.<sup>5</sup> These are not parallel stories unfolding in different worlds. They reflect a single  
 11 climate in which Jewish, Muslim, Arab, and Palestinian communities are all targeted by the same  
 12 waves of geopolitical fear and domestic hostility.

13 The U.S. Department of Justice and the U.S. Department of Education<sup>6</sup> have  
 14 acknowledged that the same conditions that increase threats to Jewish communities also increase  
 15 threats to Muslim, Arab, and Palestinian communities, and that hate crimes against these groups

16 \_\_\_\_\_  
 17 <sup>3</sup> Anti-Defamation League, *Audit of Antisemitic Incidents*, (April 16, 2024),  
<https://www.adl.org/resources/report/audit-antisemitic-incidents-2023>.

18 <sup>4</sup> This figure from the Anti-Defamation League must be considered in light of the organization's  
 19 controversial taxonomy of antisemitic incidents, which per its own methodology, includes  
 20 political advocacy critical of Israel. *See*, Shane Burley and Naomi Bennet, *Examining the ADL's*  
 21 *Antisemitism Audit*, Jewish Currents (June 17, 2024), [https://jewishcurrents.org/examining-the-](https://jewishcurrents.org/examining-the-adls-antisemitism-audit)  
 22 [adls-antisemitism-audit](https://jewishcurrents.org/examining-the-adls-antisemitism-audit) (finding over 1,000 of these incidents were not antisemitic at all, just  
 criticism of Zionism or Israel). This conflation reveals how overbroad definitions of antisemitism  
 like the one employed by AB 715 can be used to silence Palestinians advocating for the rights,  
 dignity, and freedom of their people.

23 <sup>5</sup> Council on American and Islamic Relations, *2024 Civil Rights Report: Fatal: The Resurgence*  
 24 *of Anti-Muslim Hate*, (2024) [https://islamophobia.org/civil-rights-reports/2024-civil-rights-](https://islamophobia.org/civil-rights-reports/2024-civil-rights-report-fatal-the-resurgence-of-anti-muslim-hate/)  
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25 <sup>6</sup> Justice Department Community Safety Webinars for Jewish, Muslim, Arab, and Palestinian  
 26 American Communities, U.S. Dep't of Just. (Mar. 12, 2024),  
 27 [https://www.justice.gov/archives/opa/pr/readout-justice-department-community-safety-webinars-](https://www.justice.gov/archives/opa/pr/readout-justice-department-community-safety-webinars-jewish-muslim-arab-and-palestinian)  
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 28 U.S. Dep't of Educ., Off. for C.R., Dear Colleague Letter: Discrimination, Including Harassment,  
 Based on Shared Ancestry or Ethnic Characteristics (Nov. 7, 2023),  
[https://www.ed.gov/sites/ed/files/about/offices/list/ocr/letters/colleague-202311-discrimination-](https://www.ed.gov/sites/ed/files/about/offices/list/ocr/letters/colleague-202311-discrimination-harassment-shared-ancestry.pdf)  
[harassment-shared-ancestry.pdf](https://www.ed.gov/sites/ed/files/about/offices/list/ocr/letters/colleague-202311-discrimination-harassment-shared-ancestry.pdf).

1 often rise together. The irony is unavoidable: at the very moment when federal agencies  
 2 recognize that these harms are intertwined, AB 715 chooses to name only one of them. The  
 3 statute narrows its vision to a single category of vulnerability and leaves Palestinian, Arab, and  
 4 Muslim students outside its protective reach at precisely the moment when the data shows they  
 5 are most at risk.

6 AB 715 contains several structural features that, taken together, create a statutory  
 7 framework that protects some students while rendering others invisible. Although the bill  
 8 presents itself as a broad antidiscrimination measure, its language and enforcement mechanisms  
 9 overwhelmingly center antisemitism while omitting any recognition of anti-Palestinian, anti-  
 10 Arab, or anti-Muslim harm. In community psychology, such selective naming, and the  
 11 institutional silences it authorizes is a defining marker of structural discrimination.<sup>7</sup> Across  
 12 multiple provisions, AB 715 constructs an unequal system of protection in which one group's  
 13 identity and safety are expressly prioritized, and others are excluded altogether.

14 The bill's preamble illustrates this imbalance most clearly. AB 715 Section 1(a) through  
 15 1(l) repeatedly and exclusively references Jewish and Israeli American students, describing in  
 16 detail the harms of antisemitic discrimination. Nowhere does the statute acknowledge the  
 17 existence of Palestinians, Arabs, Muslims, or the forms of discrimination they face in schools.  
 18 By identifying only one community as facing "widespread" discrimination, the statute creates a  
 19 hierarchy of vulnerability that conditions how districts interpret their obligations. It references an  
 20 "antisemitic school environment" yet offers no parallel language for what an anti-Palestinian or  
 21 anti-Arab school environment might entail. This omission is not benign; it frames harm through  
 22 a single lens and signals that Palestinian identity is not contemplated within the statute's  
 23 protective scope.

24 AB 715 deepens the structural inequality through the creation of an antisemitism-only  
 25 infrastructure. Section 280(b) requires the Superintendent to maintain a statewide web page  
 26

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27 <sup>7</sup> Isaac Prilleltensky, *The Role of Power in Wellness, Oppression, and Liberation: The Promise*  
 28 *of Psychopolitical Validity*, 31 J. Community Psychol. 116 (2003); Rachel A. Burgess et al.,  
*Intersectional Discrimination, Exclusion and the Socio-Political Economy of Global Mental*  
*Health: A Systematic Scoping Review of the Literature*, 7 SSM-Mental Health 100382 (2025).

1 dedicated exclusively to antisemitism. No equivalent mandate exists for Islamophobia, anti-Arab  
2 racism, or anti-Palestinian discrimination. Similarly, Sections 33801 through 33803.1, establish  
3 an Office of Civil Rights with a dedicated Antisemitism Prevention Coordinator, endowed with  
4 the authority to develop antisemitism education, advise on enforcement actions, engage with  
5 districts, and track and report complaints related only to antisemitism. Again, there is no parallel  
6 coordinator responsible for anti-Palestinian or anti-Arab harm. AB 715’s entire data collection,  
7 training infrastructure, and enforcement apparatus are built around antisemitism alone,  
8 employing a vague definition that leaves schools to believe any mention of Palestinian  
9 perspectives is a form of antisemitism. AB 715 thus equips schools to identify and respond to  
10 one form of identity-based harm while leaving schools structurally unprepared, discouraged, or  
11 possibly prohibited from recognizing another form of identity-based harm. As a result,  
12 Palestinian students’ experiences of discrimination remain diffuse, untracked, and unremedied,  
13 while harms against other groups receive specialized oversight and institutional priority.

14 This imbalance becomes even more pronounced in the statute’s corrective action  
15 provisions. Under Section 60151(a)(2)(C)(ii), any district found to have violated the statute in a  
16 manner involving antisemitism must develop an improvement plan in consultation with the  
17 Antisemitism Prevention Coordinator. No such specialized oversight or mandatory partnership  
18 exists for violations involving anti-Palestinian, anti-Arab, or anti-Muslim discrimination. Thus,  
19 when antisemitism is at issue, the law mandates expert-guided remediation, but when Palestinian  
20 students suffer discrimination, the statute provides no equivalent structural response. This  
21 asymmetry creates a hierarchy not simply of recognition, but of enforceable rights.

22 The statute’s instructional restrictions further magnify these disparities. Sections 51500  
23 and 51501 prohibit instruction that may “promote discriminatory bias,” do not require that any  
24 students from a protected group be present for bias to be claimed, and require all instruction to  
25 conform to what the statute calls “factual accuracy” and “professional responsibility.” In  
26 practice, these provisions have already been used by districts such as Oakland Unified since the  
27 passage of AB 715 to flag Palestinian narratives, criticism of Israeli state actions, references to  
28 Gaza, or even basic instruction in Palestinian history as possibly prohibited “discriminatory

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1 bias”<sup>8</sup> while materials centered on Jewish and Israeli perspectives are treated as neutrally factual.  
2 Because the statute’s preamble and infrastructure frame antisemitism as the predominant  
3 concern, these instructional provisions operate as a legal mechanism for suppressing Palestinian  
4 expression. Students who wear cultural symbols, mention their heritage, or reference current  
5 events experience disciplinary consequences, while teachers who acknowledge Palestinian  
6 perspectives are reprimanded or silenced. These provisions thus create a chilling effect that falls  
7 disproportionately on Palestinian identity and speech.

8 Even the statute’s reporting requirements reflect this pattern of selective recognition.  
9 Sections 33802(b) and 33803.1(5) require statewide tracking, categorization, and legislative  
10 reporting of all complaints related to antisemitism. No such tracking exists for anti-Palestinian or  
11 anti-Arab discrimination. As a result, the data that informs legislative attention, resource  
12 allocation, and statewide training systematically excludes Palestinian harm. What the state  
13 chooses to track determines what it is prepared to see; what it does not track becomes easier to  
14 dismiss as isolated, political, or irrelevant. This selective data infrastructure ensures that  
15 antisemitism is elevated as a matter of statewide concern while the experiences of Palestinian  
16 students remain institutionally invisible, or censored.

17 Taken individually, several of these provisions might appear neutral or even protective.  
18 Taken together, they form a coherent system that centers one group’s experiences while  
19 structurally erasing another’s. The bill names Jewish and Israeli students as uniquely vulnerable,  
20 builds antisemitism-specific infrastructure through statewide training, data collection, and  
21 specialized personnel, restricts instructional content in ways that disproportionately suppress  
22 Palestinian perspectives, and creates an enforcement mechanism that mandates corrective action  
23 only for one type of discrimination. This comprehensive asymmetry reflects exactly the pattern  
24 documented in empirical data published by IUAPR and in interviews with Palestinian students,  
25 parents, and educators. Palestinian students were silenced, disciplined, or erased, parents and  
26 community members were treated as political threats, and educators were discouraged or

27 \_\_\_\_\_  
28 <sup>8</sup> See, e.g., ECF No. 40-1, ECF No. 40-3 at 2-3 (raising specter that various actions—exclusively those related to Palestinian identity, Zionism, or Israel’s actions towards Palestinians—require remedial action under AB 715).

1 punished for acknowledging Palestinian grief. AB 715 does not merely fail to protect Palestinian  
2 students; its plain text formalizes the very mechanisms that have contributed to their exclusion.

3 Moreover, erasure is a distinct form of discriminatory harm for Palestinians, who often  
4 face the bigoted accusation that Palestine does not exist, and that their national identity is  
5 fabricated.<sup>9</sup> This is plainly false as a matter of US antidiscrimination law<sup>10</sup> and international  
6 law.<sup>11</sup>

7 **B. LIVED EXPERIENCES CONFIRM THAT ANTI-PALESTINIAN RACISM**  
8 **PRODUCES REAL, ONGOING HARM**

9 The stories shared by parents, students, and educators make the impact of AB 715  
10 unmistakable. California law must not endorse a pre-existing pattern of anti-Palestinian  
11 discrimination where Palestinian students described being routinely disciplined for wearing  
12 cultural symbols, questioned for naming Palestine, and told to stay silent in classrooms when  
13 they share their experience or perspectives as Palestinians. Parents described being treated as  
14 politically suspect when they advocated for their children’s safety. Educators explained that even  
15 simple references to geography or current events involving Palestine triggered complaints, and  
16 that administrators responded not by offering guidance but by reprimanding the teachers, in some  
17 cases without proper investigation of the complaint. Across districts, educators repeated the same  
18 thing: they were given no direction on how to teach or even acknowledge Palestine or Israel.  
19 Instead, they were told to avoid the topic altogether.

20 When parents who opposed the inclusion of Palestinian perspectives complained,  
21 teachers were warned or punished. When Palestinian families raised concerns, nothing happened.  
22 No investigation. No corrective action. No acknowledgment at all. This is not interpersonal  
23 conflict; it is structural bias. One group’s discomfort receives institutional protection. Another

24 \_\_\_\_\_  
25 <sup>9</sup> Laurie Kellman, *'No Such Thing' as Palestinian People, Top Israeli Minister Says*, PBS News  
26 (Mar. 20, 2023), <https://www.pbs.org/newshour/world/no-such-thing-as-palestinian-people-top-israeli-minister-says>.

27 <sup>10</sup> Lhamon Letter, *supra* note 6 (“Jewish students, Israeli students, Muslim students, Arab  
28 students, Palestinian students, and all other students who reside within our school communities  
have the right to learn in our nation’s schools free from discrimination.”).

<sup>11</sup> Legal Consequences Arising from the Policies and Practices of Israel in the Occupied  
Palestinian Territory, Including East Jerusalem, Advisory Opinion, 2024 I.C.J. (July 19).

1 group’s humanity is treated as controversial content.

2 **1. INSTITUTIONAL BETRAYAL**

3 Parents and students described the same pattern over and over: concerns minimized,  
4 reframed as political, or ignored entirely. Families explained that they stopped reporting  
5 incidents because nothing changed, or because their complaints made things worse. Some  
6 described increased scrutiny after speaking up. In community psychology, this is called  
7 institutional betrayal. When the system tasked with protecting children becomes a source of  
8 harm, families withdraw because the process itself exposes them to further risk. For example:

- 9 ● A parent reported that her daughter’s history teacher played recent speeches by  
10 the Israeli Prime Minister without context, including one in which he spoke of  
11 “finishing the job” in Gaza. This prompted the student to call her mother stating  
12 that she “felt sick,” after watching it. When her mother reported it, no corrective  
13 action was taken. When it occurred again, the student asked her mother not to  
14 report it fearing she would be targeted by the teacher.
- 15 ● A student reported that her teacher was removed for wearing a “Free Palestine”  
16 pin. The student was tearful, explaining that she had always felt this teacher was a  
17 safe space, and that after the incident she peeled the Palestine sticker off her water  
18 bottle because she no longer felt safe being visible. The student stated that she felt  
19 concerned that expressing anything Palestinian carried consequences.
- 20 ● A parent stated that she had requested support for her children who had lost  
21 family members in Gaza, but she was told that no such support system existed in  
22 the school and suggested instead that she limit their social media exposure.
- 23 ● A parent stated that while at a cultural fair, the poster that her children created for  
24 Palestine with family pictures and artifacts was publicly destroyed by another  
25 parent while a member of the administration watched. When she confronted the  
26 administrator and stated, “you saw what just happened,” he remained silent.

27 **2. IDENTITY ERASURE AND SUPPRESSION OF EXPRESSION**

28 The suppression of Palestinian identity in schools is a violation of identity safety and a

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1 clear example of symbolic exclusion. Children need to see their cultural and religious identities  
 2 reflected and affirmed in order to learn, to regulate emotion, and to feel a sense of belonging.  
 3 When students are discouraged from naming Palestine, wearing a keffiyeh, or referencing their  
 4 heritage in assignments, they receive a message that who they are is unacceptable. Educators  
 5 have also described being unable to teach even basic Palestinian history without fear of  
 6 complaint. The removal of Palestinian history, geography, and narrative from classrooms creates  
 7 a landscape in which Palestinian existence is absent. In community psychology, this kind of  
 8 erasure is understood as structural communication. It teaches children that their identity is  
 9 controversial, unwelcome, or incompatible with school. These incidents are not interpersonal  
 10 issues, isolated, or neutral. Rather, they are structural, consistent, and targeted. For example:

- 11 ● A parent of a child in middle school stated that her daughter declined to  
 12 participate in a cultural event out of fear that her “friends might find out she was  
 13 Palestinian and treat her differently.”
- 14 ● A high school student stated that he no longer wears Palestinian themed sweaters  
 15 because “when I do, teachers treat me differently.” The student also stated that he  
 16 felt “speaking about Palestine is not only discouraged, it's avoided.”
- 17 ● A parent of Palestinian children noticed a school poster naming all the languages  
 18 that students in the district speak, including languages she had never heard of, but  
 19 Arabic was missing, even though it’s the third most common language spoken in  
 20 the district (after English and Spanish). When reported, the parent was told this  
 21 was an oversight, but it was never corrected.
- 22 ● A textbook chapter on the Middle East from the widely used curriculum source  
 23 Facing History excluded any mention of Palestine. A Palestinian parent  
 24 complained and requested the district provide supplemental material, but none  
 25 was provided.

### 26 3. DIFFERENTIAL TREATMENT, SURVEILLANCE, AND 27 RACIALIZED DISCIPLINE

28 The next pattern that emerged is one Palestinian families described across schools: their  
 children’s emotions, symbols, and presence were treated as suspect, while the emotions and

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1 symbols of others were met with empathy and protection. In community psychology, this is  
2 understood as structural stigma and racialized monitoring. These terms describe what Palestinian  
3 students already know from experience: they are watched more closely, punished more quickly,  
4 and granted less room to belong.

5 When Israeli grief is publicly acknowledged by educators and administrators, while  
6 Palestinian grief is treated as political or disruptive, the school sends a clear message about  
7 whose pain is legitimate. When Palestinian students are disciplined for wearing a cultural symbol  
8 or mentioning their heritage, while comparable expressions by other groups pass without  
9 comment, the institution is policing identity, not behavior.

10 These practices create fear. They create self-censorship. They teach Palestinian students  
11 that visibility is dangerous. They reveal that the institution responds differently depending on  
12 which community’s symbols, emotions, or narratives are being expressed. This is not a  
13 misunderstanding. It is a pattern. For example:

- 14 ● A mother of an elementary school child reported that she suggested that her
- 15 daughter wear her Palestinian Thobe for Halloween. The student stated that she
- 16 was scared that she would be targeted by other students.
- 17 ● A high school student reported that after he heard a teacher was fired for wearing
- 18 a “Palestine Libre” shirt, he stopped wearing his watermelon hoodie to school.
- 19 ● A middle school student stated that she was fearful that her teacher would be fired
- 20 for having a “Ceasefire” poster on her wall.

21 **4. PSYCHOLOGICAL HARM, SOCIAL ISOLATION, AND**  
22 **EROSION OF TRUST**

23 The final theme is the psychological and physical harm of these conditions. When every  
24 part of a student’s world — peers, teachers, administrators, and curriculum — signals that their  
25 identity is unwelcome or unsafe, the outcome is predictable. Children begin to pull back. They  
26 become watchful. They develop stomachaches, headaches, emotional withdrawal, and a decline  
27 in engagement. They avoid school because school has become a place where their culture is  
28 treated as a problem.

Parents described losing trust in schools that dismissed their concerns or treated their

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1 advocacy as a threat. Students told us they withdrew socially, stayed quiet in class, and avoided  
2 any mention of their identity. Peer culture shifts too. Bullying increases. Isolation grows.

3 Palestinian students learn that disappearing is safer than being seen. For example:

- 4 ● A high school student stated that because of what was going on in school, he  
5 would get physically ill at the thought of going to school which forced him to stay  
6 home from school.
- 7 ● Another high school student stated that she loses focus and “zones out” often. She  
8 went on to say that she feels like she is “being erased” and like she “no longer  
9 belongs there.”
- 10 ● A mother of a high school and middle school student was tearful during the  
11 interview and stated that she is “not the same parent,” that she once was. She  
12 explained being in a state of constant hypervigilance surrounding her children  
13 going to school.
- 14 ● A father of a high school student stated that he felt the school environment was  
15 “so hostile,” he opted to remove his younger children from the school and now  
16 home schools them.

17 State action can create a subordinate class of children even without explicit  
18 discriminatory language. These accounts of emotional withdrawal and academic decline indicate  
19 that Palestinian students lack equal access to the educational environment. Community  
20 psychology makes clear that these outcomes are not failures of children or families. They are  
21 signs of a system that silences, stigmatizes, and neglects a distinct minority community. This is  
22 the predictable result of environments that refuse to see them. The Court must not allow the state  
23 of California to endorse this.

24 **C. EMPIRICAL RESEARCH DOCUMENTS ANTI-PALESTINIAN RACISM**  
25 **AGAINST STUDENTS AND EDUCATORS**

26 The Institute for the Understanding of Anti-Palestinian Racism (IUAPR) published  
27 results from a national survey investigating anti-Palestinian racism conducted in the United  
28 States from March 1st through April 3rd, 2024.<sup>12</sup> The underlying survey included responses from

<sup>12</sup> Anti-Palestinian Racism Research Grp., *supra* note 2.

1 more than 1,200 individuals across a racially, ethnically, religiously, gender, and age-diverse  
2 sample. Although most respondents were not Palestinian (72.5%), large proportions identified as  
3 Arab or Arab American (35.8%), White (32.0%), Asian (22.7%), Hispanic or Latinx (7.3%),  
4 Black (3.6%), and Indigenous (3.7%). Respondents were predominantly women (61.0%), largely  
5 non-Muslim (57.9%), and included a substantial LGBTQ+ population (31.7%).

6 Across this broad demographic spectrum, respondents reported high levels of exposure to  
7 anti-Palestinian racism. Nearly two-thirds (64.6%) experienced anti-Palestinian racism directly  
8 or online, a finding corroborated by 63.4% who reported silencing, exclusion, harassment,  
9 physical threat or harm, or defamation related to advocacy for Gaza or Palestinian human rights.  
10 Large majorities also reported feeling isolated in their concern (73.5%) and witnessing others  
11 experiencing anti-Palestinian racism (87.9%). Over half (55.3%) expressed fear about speaking  
12 publicly regarding conditions in Gaza or Palestinian human rights more broadly.

13 Respondents indicated that such incidents occur across key social institutions. In  
14 workplace settings, 47.5% experienced or witnessed anti-Palestinian racism from colleagues and  
15 31.6% from supervisors with hiring or firing authority. In educational settings, 37.2% reported  
16 such incidents involving teachers, faculty, or administrators, and 30.5% involving students.  
17 These findings suggest that anti-Palestinian racism is not confined to any single environment but  
18 arises in multiple professional and academic contexts.

19 Recent survey data demonstrate that anti-Palestinian racism is both pervasive and  
20 harmful within schools and academic institutions.<sup>13</sup> Large majorities of students (74%) and  
21 educators (75%) reported experiencing silencing, exclusion, harassment, physical threat or harm,  
22 or defamation when advocating for Gaza or Palestinian human rights.

23 The discriminatory conduct originates from multiple sources within educational  
24 environments. Sixty-six percent of students experienced or witnessed anti-Palestinian racism  
25 from teachers, faculty, or administrators, and an equal percentage from fellow students; nearly  
26 one-third (31%) reported such conduct from supervisors with the power to terminate their  
27 employment. Among educators, 69% experienced or witnessed anti-Palestinian racism from

28 \_\_\_\_\_  
<sup>13</sup> Inst. for the Understanding of Anti-Palestinian Racism, *supra* note 2.

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1 teachers, faculty, or administrators, 62% from workplace colleagues, 48% from students, and  
2 39% from supervisors with hiring and firing authority.

3 The data further reveal significant emotional and psychological burdens. Sixty-eight  
4 percent of students and 81% of educators felt isolated in their concern for Palestinian human  
5 rights, and majorities of both groups (60% of students and 61% of educators) reported fear of  
6 speaking openly about conditions in Gaza or Palestinian rights more broadly.

7 The health consequences are substantial. Seventy-five percent of students and 80% of  
8 educators experienced negative mental or physical health effects—ranging from anxiety,  
9 depression, and hypervigilance to insomnia, headaches, and fatigue—some, most, or all of the  
10 time.

11 Taken together, these findings indicate that anti-Palestinian racism is widespread across  
12 academic settings, originates from individuals in positions of authority as well as peers, and  
13 produces serious harms to the wellbeing, safety, and expressive freedom of both students and  
14 educators. The prevalence and severity of these impacts underscore the need for legal and  
15 institutional recognition of anti-Palestinian racism as a systemic problem requiring targeted  
16 protections and remedial measures.

17 **V. CONCLUSION**

18 AB 715 does more than overlook Palestinian students. It erases them. By building an  
19 entire legislative structure around the protection of one community while rendering invisible  
20 another community that faces well documented discrimination, the statute turns omission into  
21 exclusion. In practice, AB 715 has already authorized a system in which Palestinian identity is  
22 treated as suspicious, political, or unsafe to acknowledge.

23 For these reasons, amici respectfully urge the Court to enjoin AB 715.

24 Respectfully submitted,  
25 Dated: December 10, 2025 LEONARD CARDER, LLP

26 By: /s/ Eleanor Morton  
Eleanor Morton

27  
28 *Attorneys for* Institute for the  
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