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By: C. Grijalva, Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

DYLAN KUPSH *Plaintiff and Petitioner*, v. **REGENTS OF THE UNIVERSITY OF CALIFORNIA; BENITO NIEVES,** Interim Director of Student Conduct, in his individual capacity; **BRYAN MUROTAKE** in his individual capacity; **JEFF CHOBANIAN,** Captain of the University of California Police Department, in his individual capacity; **and DOES 1-10,** sued in their individual capacity. *Defendants and Respondents*.	**Case No.** 26STCP03255 **VERIFIED PETITION FOR WRIT OF MANDATE AND COMPLAINT** [Code Civ. Proc. §§ 1094.5, 1085; Cal. Civ. Code 52.1 Tom Bane Act; California Constitution Art. I, § 13, Article 7 § 1; First and Fourteenth Amendments to the United States Constitution] **DEMAND FOR JURY TRIAL**

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INTRODUCTION

1. Plaintiff-Petitioner Dylan Kupsh ("Petitioner") brings this action to challenge Respondents' unconstitutional, arbitrary, and retaliatory use of the student disciplinary process to punish constitutionally protected political activity.

2. Petitioner is a Ph.D. student in Computer Science at the University of California, Los Angeles, seven years into a doctoral program he was on track to complete within two academic quarters. He brings this action to set aside a two-quarter suspension that Respondents imposed and affirmed on appeal for constitutionally protected political speech, and that now threatens to end his doctorate before it can be completed.

3. Over the past two years, Respondents brought fourteen separate disciplinary charges against Petitioner arising from five incidents connected to his pro-Palestinian campus advocacy.

4. Before a hearing on any of these charges, Respondents imposed an interim suspension on Petitioner without prior notice or opportunity to be heard, resulting in a total campus ban. The interim suspension was imposed without any individualized showing that would justify a departure from bedrock due process protections. Although the terms of the suspension were modified, the interim suspension lasted from June 6, 2025, until March 24, 2026, and remains on Petitioner's transcript at the time of filing.

5. Prior to the Bruin Walk disciplinary proceeding described below, nearly all of those charges were dismissed for lack of sufficient evidence; the only prior finding of responsibility concerned Petitioner's failure to present a physical BruinCard upon request, a violation that finds no basis in University policy.

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6. The abovementioned interim suspension alone was more than sufficient punishment for Petitioner.

7. The suspension challenged in this Petition rests on the fourteenth charge, a finding that Petitioner violated an obligation similarly appearing nowhere in the text of any University policy: an affirmative duty to reposition himself or his sign whenever an approaching pedestrian wished to pass.

8. On June 15, 2026, Dean Rush approved a two-quarter suspension recommended by Associate Dean Nieves. Petitioner timely appealed. On July 31, 2026, that appeal was denied. The suspension term (June 22–December 11, 2026) predates the appeal denial and is now effective.

9. The suspension terminates Petitioner's guaranteed Teaching Assistant appointment for Summer and Fall Quarter 2026, along with the salary, health insurance, and tuition remission that accompany it.

10. Petitioner's Teaching Assistant compensation is approximately $4,828.67 per month. Summer Quarter employment alone is valued at approximately $10,536. Petitioner will additionally lose healthcare benefits valued at approximately $2,294 per quarter and tuition benefits valued at approximately $4,968.02 per quarter.

11. The suspension also disrupts the two remaining quarters of research Petitioner needs to complete his dissertation, jeopardizes continued funding from his faculty advisor, and places his readmission, which is not guaranteed, in grave doubt. Respondents also continue to withhold the master's degree Petitioner completed and submitted for conferral in December 2024, now more than 550 days ago. Absent judicial intervention, Petitioner faces the imminent and irreparable loss of employment, healthcare, degree conferral, and the doctoral program itself.

12. The suspension rests on a single sustained finding from a disciplinary process that otherwise vindicated Petitioner, though it nevertheless caused him cognizable harm, including prolonged interim suspension, exclusion from campus, delay of his master's degree conferral, reputational injury, emotional distress, and the burden of repeatedly defending himself against meritless disciplinary charges.

13. The single protest-related exception is the finding underlying the suspension challenged here. At a hearing concerning a November 19, 2024 demonstration on Bruin Walk, the Student Conduct Committee panel rejected several of the University's allegations: it found insufficient evidence that Petitioner organized the demonstration or failed to comply with any directive from University officials or police. The panel nevertheless found Petitioner responsible for interfering with the free flow of campus traffic and impeding foot traffic based on its interpretation of video footage depicting Petitioner's individual movements.

14. Having rejected those charges, the panel nonetheless found Petitioner responsible on a theory that he had an affirmative duty to reposition himself or the sign he was holding whenever an individual approached the demonstration line. This theory of liability was not disclosed to Petitioner in advance of the hearing, depriving him of the opportunity to prepare for his defense; nor does this theory appear elsewhere in the text of any University policy.

15. The individual for whom Petitioner was found to have an affirmative duty to reposition himself can be seen shoving and body-checking demonstrators, prompting UCPD officers to intervene and order him to leave.

16. On a theory of liability that exists nowhere in UCLA's code of student conduct and in response to the demands of a student who had contemporaneously assaulted students, Respondents imposed a two-quarter suspension on Petitioner.

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17. Upon information and belief, UCLA imposed no discipline on the student wrapped in the US flag assaulting Petitioner's friends and fellow students, or the other students engaging in similar conduct.

18. Respondents' pursuit of Petitioner did not occur in isolation. It followed the University's crackdown and arrest of pro-Palestine protesters in April and May 2024, the suspension of student protest leaders and organizations, disciplinary process initiated against faculty supporting pro-Palestine protest, an internal UCLA Task Force finding that the administration's response to pro-Palestinian protest activity reflected "militarization of our campus" and "punitive measures" against protected expression, and a pattern in which nearly every charge Respondents brought against Petitioner specifically was ultimately unsupported by the evidence.

19. Respondent's actions mark an unprecedented shift from how both interim suspensions and protest activity have been handled in the past. Respondent's actions constitute a clear violation of its own rules and the minimum standards of due process applicable to public institutions.

20. Petitioner brings five causes of action. He seeks (1) a writ of administrative mandamus under Code of Civil Procedure § 1094.5 setting aside the November 19, 2024 disciplinary finding as unsupported by substantial evidence and based on an interpretation of University policy unmoored from its text; (2) a writ of traditional mandate and/or prohibition under Code of Civil Procedure §§ 1085 and compelling Respondents to follow their own disciplinary procedures and cease disclosing his protected records in violation of FERPA; (3) a claim under Article I, Section 2 of the California Constitution and the First Amendment to the United States Constitution that Respondents targeted Petitioner's pro-Palestinian viewpoint for disciplinary

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treatment they did not apply to other speech; (4) a claim under Article I, Section 7 of the California Constitution and the Fourteenth Amendment to the United States Constitutions that Respondents denied Petitioner fair process, before depriving him of his enrollment, employment, and degree; and (5) a claim under the Bane Civil Rights Act, Civil Code § 52.1.

21. Petitioner has exhausted his administrative remedies and has no plain, speedy, or adequate remedy at law. He seeks a writ setting aside the suspension, declaratory and injunctive relief, and damages.

JURISDICTION AND VENUE

22. This Court has jurisdiction over this action pursuant to Code of Civil Procedure sections 1085 and 1094.5, which authorize this Court to issue writs of mandate and administrative mandamus to review and correct unlawful actions by public entities.

23. Respondent, the Regents of the University of California, is a public entity organized under the laws of the State of California and is subject to judicial review in this Court.

24. The acts and omissions complained of herein constitute final administrative actions, including disciplinary determinations and related proceedings, which are subject to review under Code of Civil Procedure § 1094.5.

25. This Court also has jurisdiction over Petitioner's claims arising under the California Constitution, including Article I, sections 2 and 7, and under Civil Code section 52.1 (the Bane Act), which provide independent bases for declaratory, injunctive, and monetary relief.

26. This Court also has jurisdiction over claims arising under the United States Constitution as a court of concurrent jurisdiction.

27. Venue is proper in this Court pursuant to Code of Civil Procedure § 393 and related provisions because the acts and omissions giving rise to this action occurred in Los Angeles County, including at the University of California, Los Angeles campus.

28. Venue is further proper because Respondents maintain offices and conduct substantial business in Los Angeles County.

PARTIES

29. Petitioner is a 27-year-old graduate student in the Department of Computer Science at the University of California, Los Angeles ("UCLA"). As a Ph.D. student, Petitioner has been engaged in academic research, teaching, and campus life, while also participating in student organizing and advocacy on matters of public concern. Prior to the disciplinary actions and sanctions challenged herein, Petitioner had no previous disciplinary actions filed against him and was actively pursuing his graduate studies and teaching responsibilities.

30. Defendant-Respondent the Regents of the University of California ("Regents") is a public entity organized under Article IX, section 9 of the California Constitution. The Regents is responsible for the governance, operation, and administration of the University of California system, including UCLA.

31. Defendant-Respondent Benito Nieves ("Nieves") is, and at all relevant times was, the Interim Director of the UCLA Office of Student Conduct. In addition to overseeing the Office of Student Conduct, Nieves served as the adjudicating Dean in one disciplinary matter involving Petitioner and participated in communications and decisions concerning the disciplinary proceedings described herein. Nieves is sued in his individual capacity.

32. Defendant-Respondent Bryan Murotake ("Murotake") was at all relevant times employed by the Regents, often as Assistant Dean of Students. Murotake served as the adjudicating

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Dean in one disciplinary matter involving Petitioner and participated in communications and decisions concerning the disciplinary proceedings described herein. Murotake is sued in his individual capacity.

33. Defendant-Respondent Jeff Chobanian ("Chobanian") is, and at all relevant times was, Captain of the University of California Police Department at UCLA. Chobanian participated in the investigation and reporting of incidents involving Petitioner and, on information and belief, advocated for disciplinary action against Petitioner. Chobanian described Petitioner as a "central figure" and communicated with University officials regarding disciplinary measures. Chobanian is sued in his individual capacity.

34. Petitioner is unaware of the true names and capacities of Defendants sued herein as DOES 1 through 10, inclusive, and therefore sues these Defendants by such fictitious names. Petitioner will amend this pleading to allege their true names and capacities when ascertained. Petitioner is informed and believes, and based thereon alleges, that each of the fictitiously named Defendants/Respondents is in some manner legally responsible for the occurrences herein alleged and for Petitioner's damages.

35. Plaintiff is unaware of the true names of Defendants DOES 1 through 10. Plaintiff sues said defendants by said fictitious names, and will amend this complaint when the true names and capacities are ascertained or when such facts pertaining to liability are ascertained, or as permitted by law or by the Court. Plaintiff is informed and believes that each of the fictitiously named Defendants is in some manner responsible for the events and allegations set forth in this complaint.

36. Plaintiff is informed and believes, and based thereon alleges, that each Defendant, including but not limited to Doe Defendants, were the employee, agent, servant, partner,

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beneficiary, trustee, executor, fictitious business name, administrator, member, subsidiary, parent company, holding company, and/or joint venturer of each of the remaining Defendants and were acting within the scope of said employment, agency, trust relationship, beneficiary status, service, partnership, membership, fictitious business name, and/or joint venture. Plaintiff is further informed and believes that each act on the part of each Defendant was substantially ratified by each of the remaining Defendants.

FACTUAL ALLEGATIONS

I. STANDARDS GOVERNING STUDENT SUSPENSIONS AND DISCIPLINARY PROCEEDINGS

37. In *Goss v. Lopez* (1975) 419 U.S. 565, the U.S. Supreme Court held that students facing suspension from a public educational institution are entitled to basic procedural protections before being deprived of their educational interests. Specifically, the Court held that due process requires "oral or written notice of the charges," "an explanation of the evidence the authorities have," and "an opportunity to present [the student's] side of the story." *Id.* at 581.The Court further explained that "as a general rule notice and hearing should precede removal of the student from school." *Id.* at 582.

38. Although the Court recognized a limited exception for emergency circumstances, it confined that exception to situations where a student's presence poses "a continuing danger to persons or property or an ongoing threat of disrupting the academic process." *Id.* In such circumstances, the required notice and hearing must follow "as soon as practicable." *Id.*

39. Both the California Constitution and United States Constitution afford robust protection to political speech, expressive activity, and protest at public universities. The U.S. Supreme Court has recognized that "[t]he college classroom with its surrounding environs is

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peculiarly the 'marketplace of ideas,'" and that state colleges and universities are not "enclaves immune from the sweep of the First Amendment." *Healy v. James* (1972) 408 U.S. 169, 180. The Court has further held that "the mere dissemination of ideas—no matter how offensive to good taste—on a state university campus may not be shut off in the name alone of 'conventions of decency.'" *Papish v. Board of Curators* (1973) 410 U.S. 667, 670. *See also Prigmore v. City of Redding* (2012) 211 Cal. App. 4th 1322, 1336 (California's liberty of speech clause "is broader and more protective than the free speech clause of the First Amendment") (quoting *Los Angeles Alliance for Survival v. City of Los Angeles* (2000) 22 Cal. 4th 352, 366-367).

40. Student protest activity, political advocacy, and association concerning matters of public concern therefore occupy the core of constitutional free-speech protections. *Tinker v. Des Moines Independent Community School Dist.* (1969) 393 U.S. 503, 508–509 ("Undifferentiated fear or apprehension of disturbance is not enough to overcome the right to freedom of expression."). Any word spoken, in class, in the lunchroom, or on the campus, that deviates from the views of another person may start an argument or cause a disturbance. But our Constitution says we must take this risk."); *Braxton v. Municipal Court* (1973) 10 Cal.3d 138, 151 ("[T]he statute does not restrict speech upon the ground that such expression might disturb the tranquility of the campus or offend the tastes of school administrators or the public.").

41. Moreover, both federal and state due process protections govern Petitioner's claims. In fact, the safeguards afforded by the California Constitution extend beyond federal requirements and include consideration of the individual's "dignitary interest" in being informed of the "nature, grounds and consequences of the action" and afforded an opportunity to present their side of the story before a responsible governmental official. *People v. Ramirez* (1979) 25 Cal. 3d 260, 269; *Gray v. Superior Court* (2005) 125 Cal. App. 4th 629, 638.

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42. California courts have applied these due process principles in the higher-education context. *Doe v. Regents of Univ. of Cal.* (2021) 70 Cal. App. 5th 521, 533. Further, "a university is bound by its own policies and procedures." *Id.*

43. The 2021 UCLA Individual Student Conduct Code, which governed Petitioner's disciplinary proceedings, provides that upon imposition of an Interim Suspension, the University must notify the student of "the charges," "the length and conditions of the Interim Suspension," and "the opportunity for a Hearing … to challenge the Interim Suspension."[1]

44. UC Policies Applying to Campus Activities, Organizations, and Students ("PACAOS") §107.00 provides that an interim suspension may be imposed, excluding a student from "classes, or other specified areas of campus," before final determination of a student conduct violation, where "there is reasonable cause to believe that the student's participation in University activities or presence at specified areas of the campus" will result in "physical abuse, threats of violence, or conduct that threatens the health or safety of any person on University property or at official University functions, or other disruptive activity *incompatible* with the orderly operation of the campus."[2] Proceedings concerning an Interim Suspension are separate from the underlying disciplinary proceedings arising from the conduct that gave rise to the Interim Suspension.[3]

45. The 2021 Individual Student Conduct Code provides that, in the case of an interim suspension, students must be provided with notice of the charges, the duration of the suspension,

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[1] 2021 UCLA Individual Student Conduct Code, § IV.A.2 (Interim Suspension), https://studentconduct.ucla.edu/2021-individual-student-code#iv_interim_suspension.

[2] PACAOS § 107.00 (emphasis added), https://policy.ucop.edu/doc/2710530/PACAOS-100

[3] 2021 UCLA Individual Student Conduct Code, §§ IV.A.1, IV.A.3 (Interim Suspension), https://studentconduct.ucla.edu/2021-individual-student-code#iv_interim_suspension.

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and an opportunity for a prompt hearing.[4] In these hearings, students are permitted to have an "advisor" with them, who may be an attorney, but is not permitted to speak on the student's behalf.[5]

46. Moreover, when an interim suspension is found to have been "unjustifiably" imposed, UC policy states that the University is committed to making "reasonable efforts...to assist an individual who has been disadvantaged with respect to employment or academic status."[6]

47. UCLA's 2021 Individual Student Conduct Code defines "Suspension" as a disciplinary sanction that terminates a student's status for a specified academic term or terms. The Code further provides that suspension is among the sanctions that may be imposed following a Student Conduct Hearing held in accordance with the procedures set forth in the Code, and that students may seek review of adverse disciplinary determinations by submitting a written appeal to the Vice Chancellor for Student Affairs.[7]

48. The 2021 Individual Student Conduct Code recognizes that suspension carries significant consequences. During a suspension, a student is not considered to be in good standing, may be prohibited from entering specified areas of the campus, may be prevented from registering or enrolling in courses, and, in the case of graduate students, must apply for readmission before resuming studies.[8]

49. The 2021 Individual Student Conduct Code further provides a process for internal appeal of disciplinary determinations. The Code permits appeals based on procedural error, newly discovered information, or the disproportionality of the sanction imposed. Where a student appeals

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[4] *Id.* §§ IV.A.2–3.
[5] 2021 UCLA Student Conduct Code, § I(A) (Advisor), https://studentconduct.ucla.edu/2021-individual-student-code#a_advisor
[6] PACAOS §107.00, *supra* n. 2.
[7] 2021 UCLA Student Conduct Code, §§ III.G.5, III.K.14, III.L, https://studentconduct.ucla.edu/2021-individual-student-code.
[8] *Id.* § III.G.5.

a sanction of suspension or dismissal as authorized by the Code, implementation of that sanction is deferred pending resolution of the appeal. [9]

II. BACKGROUND AND PROTEST AT UCLA

50. Students, faculty, and members of the UCLA community have long engaged in organizing and advocacy for Palestinian rights and liberation and in opposition to United States and University of California involvement in and support for Israel's decades-long occupation of Palestinian territory. As Israel's military campaign in Gaza intensified after October 7, 2023, killing at least tens of thousands of Palestinians, injuring many more, and destroying large portions of Gaza, organizing and advocacy at UCLA expanded in scope and took on new urgency.[10]

51. Many students (along with international law experts) viewed Israel's military campaign, including large-scale airstrikes, destruction of civilian infrastructure, and severe restrictions on access to water, food, and electricity, as grave violations of international law constituting genocide and other types of war crimes, particularly given that Gaza had been under siege since 2005 and occupation prior to that. Leading international experts have asserted that Israel's activities in the Gaza Strip amount to genocide against the Palestinian people. *See, e.g.*, U.N. Human Rights Council, *Anatomy of a Genocide*, U.N. Doc. A/HRC/55/73 (Mar. 25, 2024); *see also Application of the Convention on the Prevention and Punishment of the Crime of*

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[9] *Id.* §§ III.J, III.K.14.

[10] According to some estimates, hundreds of thousands of Palestinians were likely killed either as a direct or indirect result of Israel's military action. *See* Francesca Albanese on Gaza, *The Shame of Our Time*, UNITED NATIONS: THE QUESTION OF PALESTINE (Sept. 15, 2025), https://www.un.org/unispal/document/press-briefing-francesca-albanese-16sep25/ (last visited Aug. 4, 2026).

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Genocide in the Gaza Strip (South Africa v. Israel), Provisional Measures, Order of Jan. 26, 2024, I.C.J., ¶¶ 54, 74, 86.

52. These events galvanized significant political expression on campus, including demonstrations, teach-ins, and calls for divestment from companies connected to Israeli military operations.

53. On April 25, 2024, students established an encampment at UCLA akin to those formed at universities around the country for political expression, educational programming, and discussions concerning Gaza and the University's investment practices.[11]

54. Among other objectives, participants called upon the University of California to divest from companies complicit in Israel's military campaign in Gaza. At the time, the University of California's Chief Investment Officer publicly acknowledged that approximately $32 billion of the University's approximately $175 billion investment portfolio fell within categories identified by student protesters as the subject of their divestment demands, including investments in weapons manufacturers, Blackstone, BlackRock-managed funds, U.S. Treasury securities, and other companies.[12]

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[11] Dylan Winward & Catherine Hamilton, *UCLA Community Organizes Encampment in Response to National Call for Escalation*, Daily Bruin (Apr. 25, 2024), https://www-old.dailybruin.com/2024/04/25/ucla-community-organizes-encampment-in-response-to-national-call-for-escalation/.

[12] Dylan Winward & Sam Mulick, *UC Regents disclose investments in weapons manufacturers amid calls to divest*, Daily Bruin (May 14, 2024), https://dailybruin.com/2024/05/14/uc-regents-disclose-investments-in-weapons-manufacturers-amid-calls-to-divest; Sophie Austin, *University of California official says system has $32 billion in holdings targeted by protesters*, Associated Press (May 15, 2024), https://apnews.com/article/california-regents-university-divestment-israel-a10e121cfa68badab77efc65d8ea1925.

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55. The encampment brought together a diverse cross-section of the UCLA community, including Jewish, Muslim, and other students, and hosted activities such as a Passover Seder, prayers, teach-ins, and other educational programming.

56. Students coordinated with university officials within the encampment, emphasizing de-escalation and nonviolence, while much of the broader UCLA community supported them through participation and donations of food and supplies. Chancellor Gene Block acknowledged that "many of the protesters at the encampment remained peaceful," even as the campus demonstrations continued.[13]

57. Students participating in the encampment were subjected to escalating harassment by counter-protesters. Some counter-protesters displayed the flag of the Jewish Defense League ("JDL"), an organization associated with a history of violence against Palestinians and Palestinian Americans. Counter-protesters also erected a large jumbotron adjacent to the encampment that remained in place for days, broadcasting graphic and provocative audiovisual content through powerful speakers, including sounds of gunshots and screaming babies, descriptions of sexual violence, and loud music.[14]

58. Tensions continued to escalate over the next several days. On the evening of April 30, 2024, and continuing into the early morning hours of May 1, 2024, a large group of counter-protesters launched a coordinated attack on the encampment using physical force and a variety of

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[13] Chancellor Gene D. Block, *Our Community is in Deep Pain* (May 2, 2024), https://chancellor.ucla.edu/messages/our-community-is-in-deep-pain

[14] UCLA Task Force on Anti-Palestinian, Anti-Muslim and Anti-Arab Racism, *Second Report of the UCLA Task Force on Anti-Palestinian, Anti-Muslim and Anti-Arab Racism: The Militarization of Campus* 14 (June 28, 2024), https://uclaracismtaskforce.com/the-militarization-of-campus/; Editorial Board, *Editorial: UCLA Is Complicit in Violence Inflicted Upon Protesters, Failed to Protect Students*, Daily Bruin (May 1, 2024), https://dailybruin.com/2024/05/01/editorial-ucla-is-complicit-in-violence-inflicted-upon-protesters-failed-to-protect-students.

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objects, including fireworks, chemical irritants, poles, and other projectiles, against students and others inside the encampment.[15] They repeatedly attempted to breach the encampment's barricades, assaulted participants, and damaged property while many encampment participants attempted to defend themselves and others for several hours.[16]

59. Numerous students, faculty members, journalists, and bystanders documented the attack, and videos of the violence were widely disseminated.[17] Despite repeated requests for assistance, UCLA and law enforcement did not promptly intervene to stop the violence.[18] Many participants sustained physical injuries, and the attack generated widespread concern regarding the University's response to the safety of students participating in the encampment.[19] In the aftermath, members of the UCLA community publicly criticized the University's failure to protect students from the prolonged assault.[20]

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[15] UCLA Task Force on Anti-Palestinian, Anti-Muslim and Anti-Arab Racism, *Report of Task Force on Anti-Palestinian, Anti-Muslim and Anti-Arab Racism* 10–11 (May 13, 2024), https://uclaracismtaskforce.com/report-1/.

[16] *Id.*

[17] *Id*; Maya Vibhakar, *UCLA academic departments release statements condemning handling of encampment*, Daily Bruin (May 4, 2024), https://dailybruin.com/2024/05/04/ucla-academic-departments-release-statements-condemning-handling-of-encampment/.

[18] UCLA Task Force on Anti-Palestinian, Anti-Muslim and Anti-Arab Racism, *Report of Task Force on Anti-Palestinian, Anti-Muslim and Anti-Arab Racism* 11 (May 13, 2024), https://uclaracismtaskforce.com/report-1/; Sharla Steinman, *Local and State Officials Condemn Late Response from Law Enforcement at Encampment*, Daily Bruin (May 1, 2024), https://dailybruin.com/2024/05/01/local-and-state-officials-condemn-late-response-from-law-enforcement-at-encampment (reporting that violence began around 10:50 p.m. and law enforcement did not intervene until shortly after 2:40 a.m.).

[19] UCLA Task Force on Anti-Palestinian, Anti-Muslim and Anti-Arab Racism, *Report of Task Force on Anti-Palestinian, Anti-Muslim and Anti-Arab Racism* 10–11 (May 13, 2024), https://uclaracismtaskforce.com/report-1/; Maya Vibhakar, *UCLA Academic Departments Release Statements Condemning Handling of Encampment*, Daily Bruin (May 4, 2024), https://dailybruin.com/2024/05/04/ucla-academic-departments-release-statements-condemning-handling-of-encampment/.

[20] Maya Vibhakar, *UCLA Academic Departments Release Statements Condemning Handling of Encampment*, Daily Bruin (May 4, 2024), https://dailybruin.com/2024/05/04/ucla-academic-departments-release-statements-condemning-handling-of-encampment/.

60. On or about May 2, 2024, law enforcement raided the UCLA encampment and arrested more than 200 anti-genocide protesters. None of the mob attackers from April 30, 2024 were arrested.

61. Students continued to organize protests, including on May 6, May 23, and June 10, 2024.[21] These efforts were consistently met with law enforcement.[22]

62. Despite their role in attempting to mitigate harm, faculty members who were merely present during these incidents were later subjected to disciplinary action by the University for expressing a point of view contrary to that apparently held by much of the Administration.

63. Independent findings later corroborated widespread concerns regarding the University's response to these events. In December 2023, Executive Vice Chancellor and Provost Darnell Hunt created the UCLA Task Force on Anti-Palestinian, Anti-Muslim and Anti-Arab Racism, comprising the nation's leading scholars on this subject.

64. On June 28, 2024, the Task Force issued its Second Report, which described the University's response as involving the "militarization of our campus," "persistent attacks on students, faculty, and staff for supporting ceasefire, divestment and disclosure," and "punitive measures" against individuals expressing pro-Palestinian views, which the Task Force concluded

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[21] *See, e.g.*, Dylan Winward, *43 Individuals Arrested in Parking Structure 2 Before Pro-Palestine Sit-In, Rally*, Daily Bruin (May 6, 2024), https://dailybruin.com/2024/05/06/pro-palestine-protesters-detained-by-police-after-calls-for-moore-hall-sit-in; Dylan Winward & Sharla Steinman, *Pro-Palestine Protesters Set Up Encampment on Kerckhoff Patio*, Daily Bruin (May 23, 2024), https://dailybruin.com/2024/05/23/pro-palestine-protesters-set-up-encampment-on-kerckhoff-patio; Dylan Winward, *Pro-Palestine Protesters Set Up 3rd Solidarity Encampment in Dickson Plaza*, Daily Bruin (June 10, 2024), https://dailybruin.com/2024/06/10/pro-palestine-protesters-set-up-3rd-solidarity-encampment-in-dickson-plaza/.

[22] *Id.*

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had "made UCLA less safe than ever for Palestinian, Arab, Muslim students and faculty, and for those in solidarity with Palestinians.[23]

65. On June 10, 2024, during a peaceful campus demonstration that culminated in the unlawful arrest of Petitioner and other demonstrators near Dodd Hall, demonstrators were confronted by multiple law enforcement agencies, including UCPD and the California Highway Patrol.[24] According to the Task Force report, officers "corralled the students and faculty allies" into a confined area, issued a dispersal order that was "impossible to comply with," and then advanced on the crowd. The report further describes officers "kettl[ing] the students," using batons against individuals attempting to leave, and deploying rubber bullets, resulting in injuries to multiple students. The report additionally notes that law enforcement "blocked all entrances to Dodd Hall," preventing access to classrooms and offices, and detained more than twenty students and at least one faculty member inside the building for several hours. Faculty and staff present at the scene were unable to identify a commanding officer during the operation.[25]

66. The Task Force additionally raised due process concerns regarding the University's disciplinary processes, reporting that the University relied heavily on law-enforcement accounts when pursuing disciplinary and criminal charges and that students were often required to defend themselves without access to complete evidentiary records or other information necessary to prepare an adequate defense.[26]

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[23] UCLA Task Force on Anti-Palestinian, Anti-Muslim, and Anti-Arab Racism, *Second Report of the UCLA Task Force on Anti-Palestinian, Anti-Muslim and Anti-Arab Racism: The Militarization of Campus* 1 (June 28, 2024), https://uclaracismtaskforce.com/the-militarization-of-campus/.

[24] *Id.* at 11.

[25] *Id.* at 11-12.

[26] *Id.* at 13. (questioning "the legitimacy and accuracy of the police reports, which we learned are the sole basis for criminal and disciplinary proceedings" and noting that "students are asked to

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III. BRUIN WALK DISCIPLINARY MATTER: 20 MONTHS, THREE CHARGING ATTEMPTS, AND CURRENT SUSPENSION

A. The Protest

67. On November 19, 2024, Petitioner participated in a peaceful demonstration on Bruin Walk on the UCLA campus to call for universities to divest from companies connected to the Israeli military and the war in Gaza.

68. Bruin Walk is a central pedestrian corridor on the UCLA campus that is frequently used by students and organizations for expressive activity. Participants engaged in peaceful protest activity, including holding signs, speaking with other students, and gathering along the walkway.

69. Petitioner was present as a police liaison. He relayed messages from police to peaceful protesters and from protesters to police and administrators. He neither controlled nor directed the actions of any peaceful demonstrator.

70. Petitioner was not an organizer of the demonstration and did not interfere with pedestrian traffic, block any buildings, or otherwise disrupt the flow of traffic.

B. The Video Footage

71. Video from November 19, 2024 shows Petitioner approximately fifteen feet away from the demonstration. Even though Petitioner was not close to the protest, officers falsely asserted that he was personally blocking Bruin Walk. Petitioner possesses a true and correct copy of the video recording and will lodge or otherwise submit it to the Court and Respondents in accordance with the applicable procedures for digital evidence. It will be marked **Exhibit A**.

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respond only to these charges without having access to eyewitness accounts and other reports that could provide more context").

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72. Petitioner immediately challenged that assertion, explaining that he was not obstructing the walkway and repeatedly requesting clarification regarding the specific law or policy he was allegedly violating.

73. During the exchange, one officer stated that the group, not Petitioner, was "violating policy" and later referenced "California Code of Regulations 1503," but did not provide a complete citation or otherwise explain the legal basis for the directive.[27] (See Ex. A.)

74. Throughout the interaction, Petitioner remained cooperative and reiterated that he could relay information to demonstrators but did not control or direct their conduct. (See Ex. A.)

C. The University's Investigation and Charging Decisions

75. UCPD submitted its account of what they allege occurred that day. Sergeant Anderson states that UCPD representatives spoke with Petitioner during the peaceful protest. Sergeant Anderson reports that Petitioner said he did not organize the protest. Anderson's report makes no allegations of Petitioner misconduct. The UCPD's submission transmitting the Incident Summary to UCLA identified Petitioner as a "known individual with whom we made contact but not necessarily involved in the incident." A true and correct copy of the Incident Summary is attached as **Exhibit C.**

76. Thirteen months later in a December 19, 2025 supplemental report, a UCPD contractor falsely alleged Petitioner organized the protest. The contractor, William Hodgman,

[27] The regulation referenced by the officer does not appear to govern campus demonstrations or pedestrian access. Rather, California Code of Regulations, title 18, section 1503 concerns the sales and use tax treatment of hospitals and medical facilities. *See* Cal. Code Regs. tit. 18, § 1503 (governing sales and use taxes applicable to hospitals and other institutions); Cal. Dep't of Tax & Fee Admin., Regulation 1503: Hospitals and Other Institutions, https://cdtfa.ca.gov/lawguides/vol1/sutr/1503.html (last visited Aug. 8, 2025).

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based that characterization on observations that Petitioner spoke with other demonstrators, including individuals wearing safety vests, and communicated with UCPD officers. The supplement did not identify conduct by Petitioner directing or controlling other demonstrators. The video the contractor reviewed was not made available to Petitioner. A true and correct copy of the December 19, 2025 Supplement to Incident Summary is attached hereto as **Exhibit B**.

77. Although approximately 150 people participated in the November 19, 2024 demonstration, UCLA pursued disciplinary charges against Petitioner arising from the demonstration.

78. In addition, UCLA relied on a November 20, 2024 complaint submitted by a non-affiliated individual later identified during the disciplinary hearing as "Nicole Lakey." This complaint echoed publicly available media and social media content, including a *Daily Bruin* article and Instagram video, and alleged that demonstrators had formed a "picket-line" or "human blockade." A true and correct copy of the Complaint is attached hereto as **Exhibit D**.

79. During the disciplinary hearing, Assistant Dean Benito Nieves identified the non-affiliated complainant as Nicole Lakey. Nieves further admitted that he did not know whether Ms. Lakey was, in fact, a real person. A true and correct copy of the Student Conduct Committee Hearing Report is attached hereto as **Exhibit E**.

80. On February 6, 2025, Assistant Dean Bryan Murotake issued a Notice of Alleged Violation charging Petitioner based in part on the November 19, 2024 demonstration. The same Notice also included allegations made by another UCLA student, Nina Gilshteyn, concerning a separate incident involving different alleged conduct on a different day.

81. By combining allegations arising from distinct incidents and complainants in a single notice, the Notice failed to clearly identify which factual allegations supported each charge

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against Petitioner. Petitioner repeatedly sought clarification regarding the allegations and their respective bases, and the University subsequently reissued the Notice. Because the Notice combined allegations concerning both complainants, Petitioner repeatedly sought clarification regarding the charges against him. A true and correct copy of the February 6, 2025 Notice of Alleged Violation is attached hereto as **Exhibit F**.

82. During the student conduct process, Petitioner informed Murotake that one of the University's principal charges relied on a policy that did not exist at the time of the alleged June 10, 2024 conduct. Murotake acknowledged the issue during the meeting and later confirmed by email that the policy cited was not in effect at the time of the incident. Instead of dismissing the charges, the University committed to issuing an updated Notice Letter citing a different policy. A true and correct copy of the meeting notes and follow-up email are attached hereto as **Exhibit G**.

83. On April 28, 2025, Murotake issued an Amended Notice of Alleged Violation revising the charges against Petitioner to reflect a different University policy. The Amended Notice alleged that Petitioner violated Section 102.07 of the UCLA Student Conduct Code. A true and correct copy of the Amended Notice of Alleged Violation is attached hereto as **Exhibit H**.

84. Following the issuance of the amended Notice of Alleged Violation, Petitioner continued to meet and correspond with Murotake regarding the allegations. Throughout May and June 2025, Petitioner repeatedly sought to ensure that the investigative record accurately reflected their meetings, requested corrections to meeting notes that contained material additions and omissions, and objected to the University's reliance on inaccurate or incomplete documentation. Despite agreeing that Petitioner could review and revise the meeting notes for accuracy, Murotake repeatedly delayed finalizing the notes while continuing to advance the disciplinary process.

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85. During this period, Murotake also cancelled a scheduled meeting with Petitioner on short notice and later informed Petitioner that he intended to continue reviewing the matter and could refer it to the Student Conduct Committee without first rescheduling the cancelled meeting. Petitioner questioned the University's authority to refer the case before affording him the opportunity to complete the meeting and fully respond to the allegations, and repeatedly requested that the meeting be rescheduled.

86. On June 20, 2025, the Office of Student Conduct notified Petitioner that his case had been referred to the Student Conduct Committee for a hearing pursuant to Section III.E.3 of the 2021 UCLA Student Conduct Code. A true and correct copy of the June 20, 2025 Notice referring Petitioner's case to the Student Conduct Committee is attached hereto as **Exhibit I**.

87. The referral process was accompanied by administrative errors. In one email transmitting the referral information, Murotake mistakenly addressed Petitioner as another student ("Hello Hannah") before acknowledging that the error resulted from drafting Petitioner's email over another student's draft correspondence. Petitioner thereafter expressed concern regarding the confidentiality of the student conduct process and objected that the hearing packet Murotake prepared contained altered emails and meeting notes that did not accurately reflect the parties' discussions. A true and correct copy of the June 20, 2025 correspondence is attached hereto as **Exhibit J**.

88. Throughout the disciplinary proceedings, Petitioner repeatedly objected that the allegations against him relied on generalized descriptions of group activity rather than individualized evidence of his own misconduct. Specifically, the UCPD report and the complaint submitted by the non-affiliate relied on Petitioner's presence at the demonstration and his

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perceived association with other participants without identifying specific conduct by Petitioner that constituted a policy violation.

89. On or about March 26, 2026, Murotake left UCLA. Associate Dean Benito Nieves assumed responsibility for Petitioner's student conduct matter and undertook preparation of the University's case for hearing. On April 6, 2026, Nieves amended the Notice of Charges to add new allegations and additional prohibited-behavior provisions based on the same November 19, 2024 incident and underlying conduct previously charged. A true and correct copy of the Amended Notice Letter, together with Nieves' March 26, 2026 email reflecting that he had assumed responsibility for Petitioner's case after Murotake's departure, is attached hereto as **Exhibit K**.

90. On April 6, 2026, Hodgman prepared a Second Supplement to Incident Summary concerning the November 19, 2024 demonstration. The supplemental report asserted, among other things, that Petitioner pointed toward nearby bushes after speaking with two individuals seeking passage and later moved a sign "in front of two female individuals" who had approached the protest line. These later interpretations further expanded Hodgman's characterization of Petitioner's conduct and stood in marked contrast to the original UCPD submission, which identified Petitioner only as a "known individual with whom we made contact but not necessarily involved in the incident." A true and correct copy of the Second Supplement to Incident Summary is attached hereto as **Exhibit L**.

91. On April 20, 2026, the Office of Student Conduct required Petitioner to attend a meeting to review a five-minute video excerpt after informing him that it could not be provided electronically. During that meeting, Associate Dean Nieves disclosed that the video had been provided by UCPD Captain Scott Scheffler, marking the first time Petitioner learned that the

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University intended to rely on previously undisclosed UCPD video evidence at the hearing. (See Ex. E.)

92. Although UCLA intended to rely on the recording at the hearing, Petitioner was not provided a copy so that he could adequately prepare his defense. He was permitted to view it only in Nieves' presence. When Petitioner requested the recording or the university policy prohibiting its disclosure, Nieves refused, citing only vague concerns about FERPA.

The Hearing

93. On April 23, May 5, and May 20, 2026, UCLA convened a three-member Student Conduct Committee Hearing Panel regarding the allegations arising from the November 19, 2024 demonstration on Bruin Walk. Nieves presented the University's case, and the panel heard testimony from Hodgman, multiple UCLA faculty members, undergraduate and graduate student witnesses, UCLA alumna, and Petitioner. (See Ex. E.)

94. UCLA alleged without evidence that Petitioner participated in a "human blockade," blocked pedestrian traffic, physically obstructed individuals attempting to pass through the area, failed to comply with directions from University officials, and acted as an organizer of the demonstration. (See Ex. E.)

95. The University presented the untested statements of Miller that Petitioner was "blocking others from getting by" and that Petitioner "mirrored" or repositioned himself in response to an individual's attempt to move through a line of demonstrators. (See Ex. E.)

96. During his presentation, Nieves showed edited video footage submitted by a non-affiliate purporting to show Petitioner violating Interim Policy 850 and 852.

97. Petitioner was provided only an edited version of the video before the hearing, and the creator of said video was not presented for questioning during the hearing itself. (See Ex. E.)

98. The panel additionally reviewed video footage provided by UCPD depicting Petitioner holding or standing near a sign structure during the demonstration. (See Ex. E.)

99. During the hearing, Dean Nieves himself repeatedly acknowledged that the University's allegation was based on his own interpretation of ambiguous footage, from which he concluded Petitioner was "mirroring" another individual's movements, rather than the text of the code of conduct. (See Ex. E.)

100. At no point prior to the May 20, 2026 hearing session did Respondents' charging documents, including the April 28, 2025 Amended Notice of Alleged Violation (Ex. H) and the April 6, 2026 Amended Notice of Charges (Ex. K), reference any theory that Petitioner had an affirmative duty to reposition himself or his sign in response to an approaching individual.

101. Petitioner first learned of this theory when Nieves presented and characterized the video evidence during his case-in-chief at the hearing. Had this theory been disclosed to Petitioner in the charging documents, Petitioner would have specifically prepared and presented evidence and argument addressed to it, including: (a) evidence and testimony establishing that the individual whose movements the panel relied upon was not a pedestrian seeking passage but an individual who can be seen on Petitioner's own video shoving and body-checking demonstrators, prompting UCPD intervention; (b) argument, made directly to the panel in the first instance, that no provision of Policy 850 or Policy 852 imposes a duty to reposition oneself or one's expressive materials; and (c) evidence and argument directly challenging Nieves' characterization of the footage as depicting Petitioner "mirroring" another individual's movements, rather than merely holding a stationary, lawful position on a public walkway.

102. The evidence Petitioner presented sharply contradicted the University's characterization of Petitioner's conduct. Multiple witnesses attested that Petitioner was not an

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organizer of the November 19, 2024, demonstration, did not exercise authority over demonstrators, did not direct participants where to stand or move, did not control the actions of protesters, and was not responsible for compliance decisions made by others attending the event. (See Ex. E.)

103. At the hearing, current and former faculty, UCLA undergraduate students, graduate students, and other witnesses testified that the November 19 demonstration consisted of reading the names of Palestinians killed in Gaza and a picket line on Bruin Walk. (See Ex. E.)

104. A Professor testified that Petitioner served solely as a liaison between demonstrators and University officials and police, conveying information between the parties. That Professor testified that she remained near Petitioner throughout the demonstration and never observed him block anyone's path, impede any University official, link arms, represent himself as an organizer, or violate the Student Conduct Code. She further testified that demonstrators left space for pedestrians to walk around the picket line, including through Ackerman Union or around the line on Bruin Walk, and that many pedestrians successfully used those alternative routes. (See Ex. E.)

105. Another faculty member testified that he observed Petitioner for nearly the entire demonstration and never saw him obstruct anyone, direct others to obstruct pedestrian traffic, participate in the picket line, or serve as a protest organizer. Instead, Petitioner acted as a liaison between student demonstrators and University officials, relaying messages between the parties. The professor further testified that pedestrians retained access through Ackerman Union and around Bruin Walk, that Student Affairs personnel themselves directed pedestrians around the picket line, and that Petitioner neither blocked nor directed pedestrians attempting to use those alternative routes. He also testified that UCPD issued no dispersal order and that Petitioner

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complied with University officials while carrying messages between administrators and demonstrators. (See Ex. E.)

106. A former UCLA Assistant Adjunct Professor testified that he observed Petitioner throughout the demonstration acting as a liaison with police, communicating messages to demonstrators. The Professor testified that he never observed Petitioner block access to any individual, direct demonstrators, participate in linking arms, create a human blockade, disobey University officials, or act as an organizer. (See Ex. E.)

107. UCLA undergraduate student witnesses testified that Petitioner spent the demonstration relaying messages between University officials and demonstrators rather than participating in the picket line. They testified that Petitioner did not link arms, block pedestrian access, create a human blockade, or direct demonstrators. Instead, they observed Petitioner explaining alternative routes around the demonstration, helping pedestrians reach their destinations, communicating University messages to demonstrators, and attempting to de-escalate interactions with counter-protesters. (See Ex. E.)

108. In all, the witnesses consistently testified that Petitioner was not part of the line of demonstrators and instead remained off to the side serving as a liaison between protesters, University officials, and law enforcement. They further testified that alternative routes remained available for pedestrians, that individuals approaching the line were informed of the purpose of the demonstration and could proceed around it, and that demonstrators linked arms only after counter-protesters repeatedly pushed into and harassed participants. The witnesses likewise testified that Petitioner consistently sought to de-escalate tensions, was repeatedly subjected to harassment and threats from counter-protesters, and did not obstruct pedestrian traffic or direct the picket line. (See Ex. E.)

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109. Actual event organizers testified regarding their own roles and disputed assertions that Petitioner exercised organizational authority over the demonstration. (See Ex. E.)

110. Petitioner also presented the testimony of witnesses who testified that Student Affairs personnel and UCPD officers routinely communicated through Petitioner and requested that he relay messages to demonstrators throughout the course of the event. UCLA nevertheless continued to characterize Petitioner as an organizer based principally on statements by Director Hodgman describing Petitioner as an "apparent organizer" or "organizer." (See Ex. E.)

111. In the hearing, Petitioner was unable to cross-examine University witnesses, including the non-affiliate and Student Affairs Mitigator Chett Miller, who did not appear at the hearing. (See Ex. E.)

112. As a result, Petitioner was denied any meaningful opportunity to confront or cross-examine those witnesses despite the University's reliance on their allegations in finding him responsible. (See Ex. E.)

113. The panel heard testimony concerning allegations that Petitioner had failed to comply with directives from University officials. (See Ex. E.)

D. The Findings

114. After considering the testimony and documentary evidence, the panel concluded that there was insufficient evidence to establish a violation of UCLA Student Conduct Code Section 102.16 (Failure to Comply) and rejected the University's contention that Petitioner was an organizer of the November 19, 2024 demonstration. (See Ex. E.)

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115. The panel further found insufficient evidence that Petitioner violated provisions of UCLA Interim Policy 860 applicable to event organizers—since he was not an organizer. (See Ex. E.)

116. The panel additionally found insufficient evidence to support allegations that Petitioner lingered on University property for the purpose of committing a crime, noting that UCPD neither arrested Petitioner nor issued a citation based upon the conduct underlying the allegation which seemed unlikely if they genuinely believed he was committing a criminal offense. (See Ex. E.)

117. The panel did not find that Petitioner physically blocked all available paths of travel, prevented any individual from walking around the demonstration, or failed to comply with instructions from University officials or law enforcement. (See Ex. E.)

118. The panel found no evidentiary support for the allegation Petitioner was responsible for the conduct of the peaceful demonstrators. (See Ex. E.)

119. Although the panel rejected significant portions of the University's case, it ultimately concluded that Petitioner violated § 102.07 of the 2021 UCLA Student Conduct Code by violating UCLA Interim Policy 850, which prohibits individuals from "block[ing] entrances to or otherwise interfer[ing] with the free flow of campus traffic (pedestrian or vehicular) into and out of campus facilities, or along walkways or roadways," and UCLA Interim Policy 852, which prohibits individuals from "imped[ing] or disrupt[ing] foot and vehicular traffic," respectively.[28] (See Ex. E.)

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[28] *See* 2021 UCLA Student Conduct Code § 102.07 (Violations of University Policy), https://studentconduct.ucla.edu/2021-individual-student-code; UCLA Interim Policy 850: General Use of UCLA Property § IV.A.1 (Sept. 4, 2024), https://www.adminpolicies.ucla.edu/APP/Number/850.0; UCLA Interim Policy 852:

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120. This conclusion was based in significant part on Nieves's extratextual interpretation of Policies 850 and 852 claiming Petitioner failed to meet his affirmative obligation to reposition himself or the sign he was holding to accommodate an approaching pedestrian. Rooted in Nieves' "mirroring" theory, the panel found Petitioner in violation of a nonexistent UCLA policy requiring students engaged in expressive activity to alter their position whenever an approaching individual wished to move through a particular location. (See Ex. E.)

121. The panel did not identify, nor could it identify, any written University policy imposing such an affirmative obligation because such a policy does not exist. (See Ex. E.)

122. Rather, both clauses of Section 850 are framed in terms of effects on traffic flow generally, not an individual's failure to accommodate a specific approaching person. The seeming catchall "otherwise interfere with the free flow" must be read as consistent with "block entrances" i.e., conduct that actually impedes movement, not a static position that inconveniences one pedestrian. Policy 850 nowhere imposes an affirmative duty to reposition oneself or one's expressive materials.

123. Similarly, Policy 852 prohibits "imped[ing] or disrupt[ing] foot and vehicular traffic," and separately prohibits "obstructing, disrupting, or otherwise interfering with the instructional, research, or administrative operations of the University, or any other person having lawful business with the University." Policy 852 also provides that "unrestricted access to and exit from classrooms, laboratories, parking structures, offices, and buildings must be provided at all times."

Public Expression Activities § IV.A.3.a (Sept. 4, 2024), https://www.adminpolicies.ucla.edu/APP/Number/852.0.

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124. The panel made no finding that Petitioner obstructed access to or exit from any building, classroom, or other enumerated facility; its finding concerned only Petitioner's positioning relative to an individual walking along an outdoor path. Policy 852's sole affirmative-duty clause is therefore inapplicable on the panel's own findings, and the remaining prohibitions in both Policy 850 and Policy 852 are framed exclusively in terms of prohibited effects on traffic flow and University operations, not an individual's failure to yield to an approaching person.

125. Nieves recommended that Petitioner be suspended for two academic quarters, from June 22, 2026, through December 11, 2026, encompassing both Summer Quarter 2026 and Fall Quarter 2026. (See Ex. E.)

126. On June 15, 2026, Dean of Students Jasmine Rush issued a final disciplinary decision adopting the Student Conduct Committee Hearing Panel's findings and recommended sanction and imposing a two-quarter suspension, from June 22, 2026, through December 11, 2026. A true and correct copy of Dean Rush's June 15, 2026, Final Decision is attached hereto as **Exhibit M**.

127. At the time the recommended suspension was approved, Petitioner had already been excluded from campus for approximately 291 days pursuant to the interim suspension.

128. Similarly, 550 days had passed during which Petitioner was unable to obtain conferral of his master's degree because of the pending disciplinary proceedings.

129. On July 10, 2026, Petitioner timely appealed the disciplinary findings and recommended suspension to Gorden pursuant to the UCLA Individual Student Conduct Code. In his appeal, Petitioner identified numerous procedural, evidentiary, and constitutional errors in the disciplinary proceedings and requested that the disciplinary findings and recommended suspension

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be reversed. A true and correct copy of Petitioner's Administrative Appeal is attached hereto as **Exhibit N**.

130. Petitioner's appeal was denied on July 31, 2026, resulting in a two-quarter suspension that deprives him of employment, funding, healthcare benefits, academic progress, degree conferral, and continued enrollment at UCLA. A true and correct copy of Gorden's July 31, 2026, appeal decision is attached hereto as **Exhibit O.**

131. The 2021 UCLA Student Conduct Code provides that, in determining an appropriate sanction, the Dean should consider the "context and seriousness of the violation." The Code, however, does not prescribe standards for determining the length of a suspension beyond those general considerations. Upon information and belief, however, UCLA maintained no additional guidelines governing how those factors should be applied in determining the length of a suspension.[29]

132. Following implementation of the suspension, Respondents began terminating Petitioner's University employment and access notwithstanding his existing Teaching Assistant appointment for Summer Quarter 2026. On or about August 15, 2026, Petitioner contacted UCPath, the University of California system that administers employee payroll and employment records, and was informed that his employment status reflected that he had been "separated" from the University effective August 15, 2026. Shortly thereafter, Petitioner lost access to UCLA's Slack system.

[29] *See* 2021 UCLA Student Conduct Code § III.G (Sanctions and Additional University Actions), https://studentconduct.ucla.edu/2021-individual-student-code#g_sanctions_and_additional_university_actions (providing that the Dean "will consider the context and seriousness of the violation" in determining the appropriate sanction, but not prescribing specific standards for determining the length of a suspension).

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133. At the time University records reflected his separation, however, Petitioner's Summer Quarter Teaching Assistant appointment had not yet expired, and Petitioner continued to have assigned employment duties through approximately August 21, 2026. No one in Petitioner's department had informed him that his appointment had been terminated, instructed him to cease performing his duties, or otherwise explained his employment status.

134. Petitioner received a lump-sum payment on or about August 5, 2026 associated with his Summer Quarter Teaching Assistant appointment. As of the filing of this Petition, Respondents have not informed Petitioner whether his separation will affect that payment or any remaining compensation and benefits associated with his Summer Quarter appointment.

135. Petitioner also has a guaranteed Teaching Assistant appointment for Fall Quarter 2026. Under the 2021 UCLA Student Conduct Code, implementation of the recommended suspension automatically terminates Petitioner's Teaching Assistant appointment.[30]

136. The loss of employment deprives Petitioner of substantial compensation and benefits, including salary, healthcare coverage, tuition remission, and other benefits associated with graduate student employment.

137. Petitioner's Teaching Assistant compensation is approximately $4,828.67 per month. Summer Quarter employment alone is valued at approximately $10,536. Petitioner has lost healthcare benefits valued at approximately $2,294 per quarter and tuition benefits valued at approximately $4,968.02 per quarter.

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[30] 2021 UCLA Student Conduct Code § III.G.5 (2021), https://studentconduct.ucla.edu/2021-individual-student-code#g_sanctions_and_additional_university_actions; UCLA Division of Graduate Education, *Working at UCLA*, https://grad.ucla.edu/funding/working-at-ucla/ (providing that Academic Apprentice Personnel, including Teaching Assistants, must be registered and enrolled in at least 12 units continuously during the term of appointment).

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138. The suspension also threatens Petitioner's ability to complete his doctoral degree. Petitioner anticipated requiring approximately two additional academic quarters to complete the research and writing necessary to obtain his Ph.D. and had planned to graduate during Fall 2026, or Winter 2027 at the latest.

139. Petitioner's doctoral studies depend heavily upon continued funding. For the previous two academic years, Petitioner relied primarily on departmental Teaching Assistant appointments to finance his graduate studies. Recent departmental funding changes have made continued financial support increasingly dependent upon faculty advisor funding decisions.

140. Petitioner has submitted and successfully passed his oral qualifying examinations and developed a timeline for completion of the dissertation work necessary to complete his doctoral program. The recommended suspension has already substantially disrupted that timeline and continues to jeopardize Petitioner's ability to graduate as planned.

141. Following imposition of the suspension, UCLA placed additional holds on Petitioner's student account that prevent him from enrolling, receiving grades or a diploma, obtaining transcripts, and accessing campus services. The holds also restrict fee assessment and financial aid. As a result, Petitioner is presently unable to obtain an official transcript reflecting coursework and grades he completed before the suspension.

142. Because of the loss of employment and funding, Petitioner reasonably believes that he may be forced to withdraw from the University entirely, forfeiting years of doctoral study after successfully completing his oral qualifying examinations, advancing to the dissertation stage, and investing substantial time, money, and effort toward completing a Ph.D. that he expected to finish within approximately two academic quarters.

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143. The suspension will also further delay conferral of Petitioner's master's degree, the requirements of which he fulfilled in December of 2024. Nevertheless, because of the pending Student Conduct matters, Petitioner has been unable to obtain conferral of the degree, harming his professional and employment prospects.

144. Petitioner is further informed and believes that any degree ultimately conferred may reflect the existence of the disciplinary suspension on associated academic records, which will jeopardize his future prospects.

145. Under UCLA graduate education policies, following the lifting of a suspension, a graduate student who wishes to resume graduate study at UCLA must apply for readmission through the Division of Graduate Education's online application.[31]

146. Readmission following suspension is not guaranteed. UCLA requires returning graduate students to file an Application for Graduate Admission, and UCLA's graduate admission policies provide that meeting minimum requirements does not ensure admission, which is limited by the number of available places and student support and is based on applicants' scholastic qualifications and preparation for their graduate field of study.[32]

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[31] UCLA Division of Graduate Education, *Standards and Procedures for Graduate Study at UCLA* (2025), "Readmission," p. 43 ("Following the lifting of suspension, if students wish to resume their graduate study at UCLA, students must apply for readmission through the Graduate Division's online application.")

[32] UCLA General Catalog, *Graduate Admission—Admission Policies*, https://catalog.registrar.ucla.edu/Graduate-Study/Graduate-Admission/Admission-Policies (providing that graduate students returning after an absence, except a formal leave of absence, must file an Application for Graduate Admission); UCLA General Catalog, *Graduate Admission*, https://catalog.registrar.ucla.edu/Graduate-Study/Graduate-Admission (providing that meeting minimum requirements does not ensure graduate admission, which is limited by the number of places and amount of student support available, and that applicants are evaluated on scholastic qualifications and preparation for the graduate field of study).

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147. Petitioner has been informed by department personnel that the off-cycle admissions are generally not feasible and that any readmission application may require waiting until a subsequent admissions cycle. In addition, Petitioner has been informed that his faculty advisor cannot financially support his doctoral research beyond the current academic year. Because readmission is contingent upon available funding and is not guaranteed, Petitioner faces a substantial risk that the recommended suspension will effectively terminate, rather than merely interrupt, his doctoral studies at UCLA.

148. Petitioner faces immediate and irreparable harm absent judicial intervention as a result of Respondent's actions.

IV. UCLA'S HISTORY OF ATTACKS ON PETITIONER

A. Respondents Suspend Petitioner With No Notice, No Opportunity to be Heard, and Impose Sweeping Campus Ban

149. On June 6, 2025, the Office of Student Conduct imposed an interim suspension and exclusion order barring Petitioner from campus pending resolution of the disciplinary matters described below.

150. The sweeping suspension prohibited Petitioner from attending classes, entering University property, and participating in University activities. A true and correct copy of the June 6, 2025, Notice of Student Conduct Matter & Interim Suspension and Exclusion is attached hereto as **Exhibit U**.

151. Respondent imposed the June 6, 2025 interim suspension and total campus ban without providing Petitioner advance notice of the specific evidence relied upon or any opportunity

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to respond before the suspension took effect. Petitioner received no communication indicating that an interim suspension was under consideration prior to receiving the June 6, 2025 Notice itself.

152. The Notice took effect immediately upon issuance, barring Petitioner from campus, University facilities, and University activities before he had any opportunity to review the evidence against him or to be heard.

153. The June 6, 2025 Notice did not identify any specific act of violence, threat, or safety risk attributable to Petitioner.

154. As detailed below, none of these hearings, at any point before or after the interim suspension issued, resulted in a finding that Petitioner engaged in violence, physical altercation, or conduct threatening the health or safety of any person, as required to support an interim suspension under PACAOS § 107.00. No such allegation was even made.

155. Instead, Respondents singled out Petitioner, targeting him for suspension. Internal communications obtained through record requests reveal that Murotake discussed imposing an interim suspension on Petitioner in connection with the February 18, 2025, demonstration, but senior administrators ultimately decided not to pursue such measures at that time.

156. On May 16, 2025, Chobanian, Lurie, and Murotake all requested that Petitioner be suspended within hours of one another. A true and correct copy of internal University email communications dated May 16 through May 23, 2025, reflecting discussions among University administrators regarding disciplinary proceedings and Petitioner's interim suspension, is attached hereto as **Exhibit T**.

157. Lurie emailed Rush and Gorden suggesting that a narrative from UCPD could help imposing an interim suspension on Petitioner. In response, University officials acknowledged that

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they were already discussing Petitioner with the Office of Student Conduct and began considering interim suspension measures. (See Ex. T.)

158. UCPD officer Chobanian subsequently urged the Office of Student Conduct to initiate disciplinary proceedings against Petitioner, falsely characterizing him as "a known organizer and public face of" Students for Justice in Palestine (SJP), claiming without evidence that he "regularly organizes unauthorized events and demonstrations" and attributing to Petitioner the impact Chobanian alleges peaceful protest had on the campus as a whole. (Ex. T)

159. Chobanian further characterized Petitioner as having engaged in "repeated violations of university policy" that "disrupt the campus community and create environments of disruption, intimidation, and disorder." At the time Chobanian made these statements, none of the disciplinary matters then pending against Petitioner had yet been adjudicated, and each was later resolved with a finding of no responsibility besides the failure to present ID and the Bruin Walk novel theory.

160. No disciplinary finding, before or after Chobanian's statement, ever established that Petitioner engaged in intimidating conduct or created disorder. Chobanian's statement identified no specific incident of violence, threat, or safety risk attributable to Petitioner, as required to support an interim suspension under PACAOS § 107.00.

161. But Chobanian's primary concern was Petitioner's "disregard for university authority," "long standing pattern of defiance," and challenges to university rules that "undermines institutional authority." Chobanian urged "firm and immediate action" and recommended disciplinary intervention. (See Ex. T.)

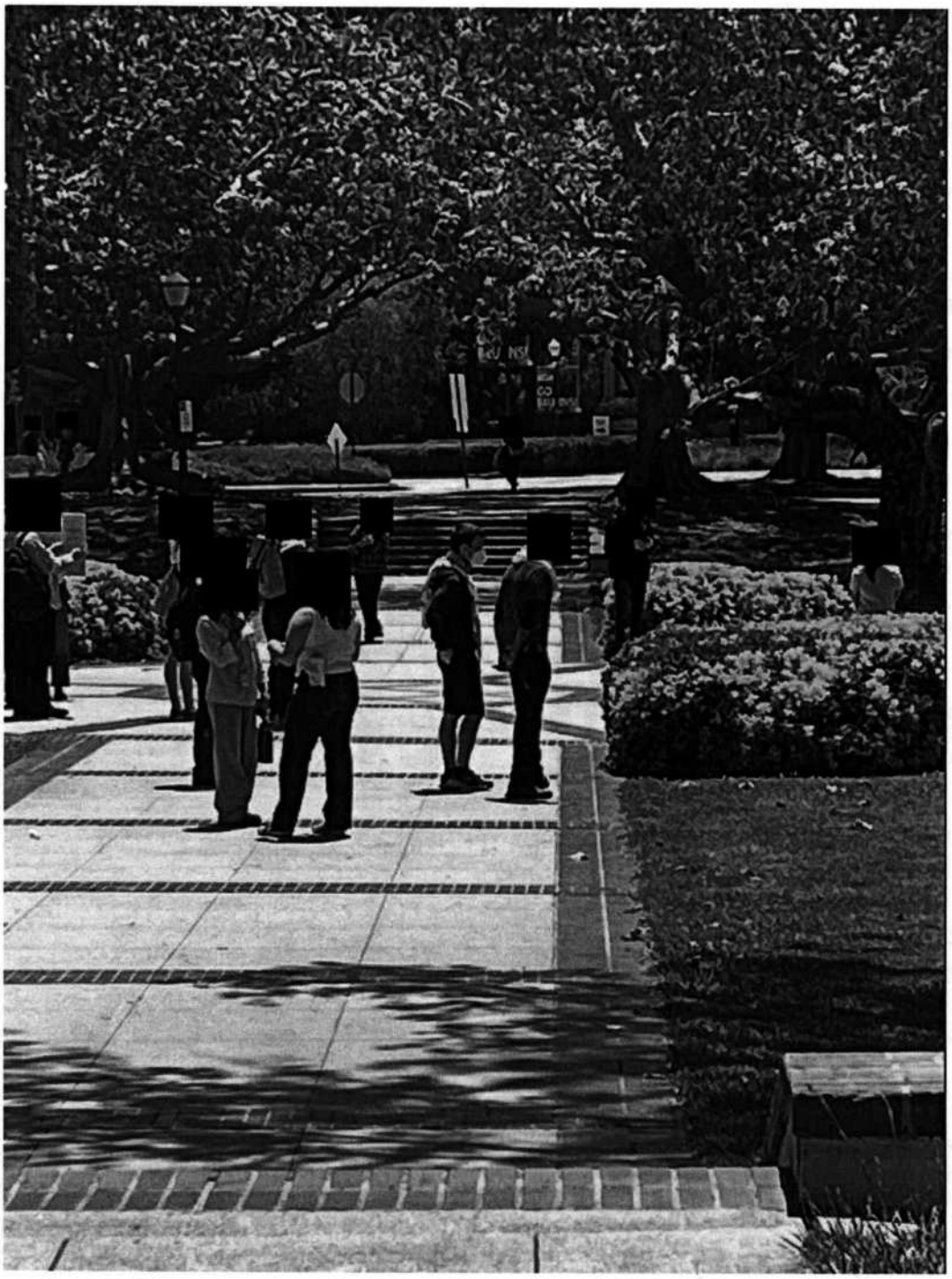
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162. Murotake informed University administrators that he was considering interim disciplinary action against Petitioner and would consult with UCPD and University counsel. (See Ex. T.)

163. Murotake reported that UCPD and University counsel had approved interim suspension measures and that he would prepare the necessary memorandum for approval. On May 23, 2025, University officials circulated draft suspension materials supported primarily by a Student Affairs report and three photographs reproduced below.

164. The photographs depict Petitioner, identifiable as the individual wearing a black jacket, black shorts, and a black-and-white keffiyeh, standing at the edge of the demonstration and apart from the main crowd. He is not shown using amplified sound, carrying banners, erecting structures, directing participants, obstructing movement, or otherwise engaging in the conduct later attributed to him. (See Ex. T.).

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165. On May 30, 2025, UC Regent Jay Sures lost his lawsuit against Petitioner and was statutorily required to pay Petitioner's attorney fees.

166. On or about June 5th, 2025 while observing a protest on campus, Petitioner was called over by name by a campus security employee of the Respondents. This employee showed Petitioner their phone lockscreen, which the employee had changed to a childhood picture of Petitioner. Petitioner recognized the photo as a zoomed in picture of him with his family. The employee's actions were part of a broader pattern of targeted harassment by UCPD, campus security, and the University, including regularly heckling Petitioner in an effort to intimidate him.

167. On June 6, 2025, just one day after police threatened and intimidated and just one week after one of the UC Regents lost a lawsuit against him, Respondents imposed an interim suspension and accompanying total campus ban on Petitioner without notice, without presenting evidence, and without hearing from Petitioner.

168. Petitioner promptly appealed. The June 10, 2025 appeal meeting with Dean Rush confirmed that Petitioner had not been afforded a meaningful opportunity to respond to the suspension before it was imposed. University officials proceeded with the meeting despite Petitioner not having received the case file or evidentiary materials underlying the suspension. Only after Petitioner raised this deficiency, and Rush acknowledged she had been unaware of it, did the University pause the meeting to allow Petitioner to obtain the materials necessary to understand and respond to the allegations against him.

169. On June 13, 2025, Petitioner filed a grievance through UAW 4811 challenging the suspension as lacking just cause and interfering with his duties as a Teaching Assistant because it prevented him from performing employment-related responsibilities and caused substantial academic and professional harm.

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170. On June 16, 2025, Rush informed Petitioner that she was "unable to issue a partial decision" on his appeal due to limited time and ongoing review. This response came after Petitioner had specifically requested an interim or partial determination so that he could attend a required ASUCLA Board of Directors retreat scheduled for June 16–17, 2025.

171. On June 18, 2025, Rush upheld the interim suspension on appeal, permitting only limited access to campus for restricted research activities while otherwise maintaining the exclusion order. In doing so, Rush did not address the merits of the underlying allegations or explain whether the available evidence supported the charges against Petitioner. Rush never addressed whether the suspension, in its scope or duration, was narrowly tailored to any specific risk Petitioner was alleged to pose.

172. A true and correct copy of Rush's June 18, 2025, decision partially modifying but otherwise upholding the interim suspension and exclusion is attached hereto as **Exhibit V**.

173. Over the following months, Petitioner repeatedly sought reconsideration of the suspension, explaining that the continued suspension was causing severe academic, professional, and financial harm, including interference with his research, teaching responsibilities, funding, and degree progress. By that point, multiple Student Conduct Committee proceedings had resulted in findings that there was insufficient evidence to support allegations of disruption, obstruction, and disorderly conduct.

174. Despite Petitioner's requests, the University declined to lift the suspension, also denying his reconsideration request in which he argued that the exclusion order imposed severe burdens on his ability to engage in protected expressive, academic, and advocacy activities on campus.

175. On March 24, 2026, after several Student Conduct Committee determinations found insufficient evidence supporting the University's allegations, Nieves lifted Petitioner's interim suspension and exclusion measures and removed the associated restrictions that had been in place since June 6, 2025. The Interim Suspension is still reflected on Petitioner's transcript, as of the date of filing.

176. The interim suspension and campus exclusion order remained in effect for approximately 291 days, from June 6, 2025 through March 24, 2026, without any fixed end date, periodic review requirement, or mechanism by which Petitioner could obtain reconsideration of its continued necessity. Respondents informed Petitioner only that the suspension would remain in place pending resolution of the underlying disciplinary matters, without specifying when that resolution would occur or providing any standard by which the suspension's continuation would be evaluated in the interim.

177. At no point between June 6, 2025 and March 24, 2026 did Respondents provide Petitioner a hearing at which the necessity of continuing the interim suspension was determined based on evidence specific to Petitioner, tested through cross-examination, or subject to a defined evidentiary standard.

178. During this period, Respondents resolved three of the five underlying disciplinary matters in Petitioner's favor (the Young Hall matter on March 23, 2026, the June 10, 2024 encampment matter on August 15, 2025, and the February 18, 2025 GSJP matter on February 5, 2026) without lifting or narrowing the interim suspension in response to any of those determinations.

179. On information and belief, Respondents' decision to impose the June 6, 2025 interim suspension was not based on an individualized assessment of any emergency or safety risk

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specific to Petitioner. Rather, it reflected a cumulative response to Petitioner's protected speech when he participated in pro-Palestinian protest activity, including the protest over which UC Regent Jay Sures sued Petitioner and lost.

180. These retaliatory steps against Petitioner were pervasive, including his mischaracterization by Chobanian, Lurie, and Murotake as a "known organizer," "central figure," and "special, stand out type of conduct violation" whose political protest challenged "institutional authority."

181. Respondents produced no evidence that Petitioner posed a risk of any specific act of violence, threat, or safety concern attributable to Petitioner that would have supported an interim suspension under PACAOS § 107.00's "reasonable cause" standard.

B. First Disciplinary Matter: June 10, 2024, Young Hall Gathering

1. The Young Hall Gathering

182. On June 10, 2024, Petitioner attended a gathering near Young Hall. During the gathering, student Nina Gilshteyn recorded Petitioner and other participants over their objections. Petitioner did not block access to Young Hall and did not prevent Gilshteyn from accessing the building or leaving the area. Video evidence showed approximately fifteen feet of open space between the gathering and Young Hall.

2. The Disciplinary Charges

183. On or about August 19, 2024, Gilshteyn submitted a sprawling and unclear incident report alleging that Petitioner and other students had restricted her access to Young Plaza, participated in a union meeting, and passes "antisemitic resolutions" in the Graduate Student Association. Gilshteyn further asserted that Petitioner "should be expelled from UCLA." UCLA

later initiated disciplinary proceedings against Petitioner, transforming a rant by a student about which the university made no efforts to determine credibility, into the grounds for student discipline. A true and correct copy of the Student Conduct Committee Hearing Report concerning the Young Hall matter is attached hereto as **Exhibit P**.

3. The Disciplinary Proceedings

184. On February 6, 2025, UCLA initiated disciplinary proceedings against Petitioner arising from the June 10, 2024, Young Hall gathering and charged him with violating Section 102.07 of the Student Conduct Code based on allegations that he interfered with pedestrian traffic by blocking a student's access to a space on or around Young Hall. UCLA initially identified Interim UCLA Policy 850 as the basis for the charge. But that policy did not take effect until September 4, 2024, nearly three months after the alleged conduct. After Petitioner raised that issue, UCLA acknowledged that Policy 850 was not in effect on June 10, 2024.

185. Instead of dismissing the baseless charges filed under a policy that did not exist at the time of the alleged incident, Respondents found a different policy under which they charged Petitioner while still relying on the language of the first policy to issue charges.

186. The evidentiary basis for the charge was similarly deficient. During a June 10, 2025, meeting, Murotake repeatedly acknowledged that the video evidence did not depict Petitioner blocking access to Young Hall or any nearby building. UCLA nevertheless continued to pursue disciplinary proceedings against Petitioner.

187. During a March 5, 2025 meeting, Petitioner informed Murotake that he had been subjected to doxxing, harassment, and threats arising from his pro-Palestinian advocacy on campus. Petitioner described incidents in which individuals followed him on campus, referenced his home address, and stated that he "would not be safe at home."

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188. Petitioner also described a voicemail received by his parents stating, among other things, "We know where you live" and "You're going down."

189. Petitioner further informed Murotake that he believed the University had failed to adequately address the harassment and threats directed toward him. Petitioner explained that Ms. Gilshteyn had previously followed him and other pro-Palestinian organizers during meetings, demonstrations, and campus activities and had repeatedly submitted complaints against students involved in Palestine solidarity organizing.

190. Respondents took no proactive steps to ensure Petitioner's safety.

191. Instead, Respondents continued to pursue discipline against Petitioner based on a video that showed no violation of university policy and a complaint made by a stalker.

4. The Hearing

192. A hearing was held on February 27, 2026, and continued on March 9, 2026. During the hearing, Murotake acknowledged that the original notice cited the wrong policy and was unable to identify any entrance Petitioner allegedly blocked or any portion of the videos showing Petitioner preventing access to a campus building. (See Ex. P.)

193. Respondents presented no other evidence supporting their claims.

194. Petitioner presented multiple witnesses who disputed the allegations against him. They testified that the gathering did not block access to any campus building or impede pedestrian traffic, that Gilshteyn repeatedly circled the gathering to record participants rather than attempting to enter Young Hall, and that Petitioner never prevented her from accessing the building.

195. During the hearing, Petitioner again raised concerns regarding his safety in light of the ongoing doxxing, harassment, and threats arising from his political advocacy. Petitioner

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requested protective measures, including anonymity for participants in the hearing process. The request was denied, and the hearing proceeded despite Petitioner's safety concerns.

5. The Committee's Findings

196. Following the hearing, the Student Conduct Committee found insufficient evidence to conclude that Petitioner violated University policy. The Committee determined that the evidence did not establish that Petitioner blocked access to Young Hall, interfered with access to any campus building, or otherwise impeded pedestrian traffic. (See Ex. P.)

197. The Committee further found that Gilshteyn's account and Respondent's charges were inconsistent with the video evidence and credited testimony establishing that the entrances remained unobstructed and individuals were able to move freely through the area. (See Ex. P.)

198. On March 25, 2026, Petitioner wrote to Dean of Students Rush requesting supervisory review of the Office of Student Conduct's compliance with University procedures in its handling of the Young Hall disciplinary matter. Petitioner specifically raised Murotake's acknowledgements concerning the absence of evidence that Petitioner blocked access to Young Hall, questioned why the matter had nevertheless proceeded to a hearing under the Student Conduct Code, and requested identification of the policy violation and evidence upon which the referral had been based. Petitioner further informed Rush that Associate Dean Benito Nieves had declined his prior request to review Murotake's handling of the matter. Rush subsequently advised Petitioner that her role in the matter had concluded.

C. Second Disciplinary Matter: June 10, 2024, Encampment Demonstration

1. The Encampment Demonstration

199. On June 10, 2024, Petitioner participated in a peaceful demonstration on UCLA's campus. UCPD issued dispersal orders at Royce Quad and Kerckhoff Patio, both of which

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Petitioner complied with by leaving the area. At Royce Quad, a UCPD officer thanked Petitioner for his "co-operation" as he departed.

200. Later, near Dodd Hall, Petitioner again attempted to leave but encountered conflicting instructions and exit routes blocked by law enforcement. Video footage depicts Petitioner stating, "I'm trying to get out," shortly before officers arrested him. No criminal charges were filed against Petitioner arising from the arrest. **Exhibit Q**.

2. The Disciplinary Charges

201. UCLA nonetheless initiated disciplinary proceedings against Petitioner, alleging that he participated in an unauthorized encampment, disrupted final examinations, obstructed pedestrian movement, and failed to comply with dispersal directives. On August 29, 2024, UCLA charged Petitioner with obstruction or disruption, disorderly behavior, disturbing the peace, and failure to comply. A true and correct copy of the Student Conduct Committee Hearing Report concerning this disciplinary matter is attached hereto as **Exhibit Q**.

202. The University's allegations relied substantially on reports describing the conduct of demonstrators collectively, including allegations that the group erected encampments, disrupted examinations, and obstructed access. Although University officials also attributed certain conduct individually to Petitioner, the evidence presented at the hearing repeatedly contradicted those allegations. Multiple witnesses testified that Petitioner did not direct demonstrators, obstruct pathways, disrupt examinations, or engage in prohibited conduct. (See Ex. Q.)

3. The Hearing

203. The Student Conduct Committee held a hearing on June 13, 2025, which continued on July 2, 2025. During the hearing, multiple witnesses testified that Petitioner did not direct

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demonstrators, obstruct pathways, disrupt examinations, or engage in prohibited conduct. (See Ex. Q.)

204. Petitioner asked the University to identify any evidence that he personally violated the Student Conduct Code. Assistant Dean Passer acknowledged that the University's evidence consisted principally of police reports describing the demonstration generally and did not identify any specific conduct attributable to Petitioner.

205. Even after the Office of Student Conduct sought additional information from UCPD, the supplemental materials likewise relied on generalized descriptions of demonstrators as a group and, at most, identified Petitioner only as being present in photographs or body-worn camera footage rather than engaging in any prohibited conduct. When Petitioner requested that the charges be addressed on an individualized basis, Passer declined to do so. (See Ex. Q.)

4. The Committee's Findings

206. Following the hearing, the Student Conduct Committee rejected each of the four charges. The Committee found insufficient evidence that Petitioner obstructed or disrupted University activities, engaged in disorderly behavior, disturbed the peace, or failed to comply with University directives. (See Ex. Q.) The Committee further determined, more likely than not, that Petitioner complied with the dispersal orders issued at Royce Quad and Kerckhoff Patio and that no dispersal order was given at Dodd Hall. (See Ex. Q.)

207. The Committee also rejected the characterization of Petitioner as controlling the demonstrators. Instead, the evidence established that Petitioner served as a liaison between demonstrators and University officials, attempted to deescalate tensions, and facilitated communication. The Committee found that Petitioner served as a police liaison rather than a group

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leader and credited evidence that he did not control or direct the actions of other demonstrators. (See Ex. Q.)

D. Third Disciplinary Matter: February 18, 2025, Demonstration and Respondents' Improper Attribution of GSJP Activity

1. The February 18 Demonstration

208. On February 18, 2025, approximately 100 to 150 students, faculty, and community members participated in a peaceful campus demonstration protesting UCLA's suspension of pro-Palestinian student organizations. The demonstration was publicized through social media and included speeches, signs, chants, and other expressive activity. UCLA later alleged that Graduate Students for Justice in Palestine ("GSJP") had promoted and participated in the demonstration despite having been placed on interim suspension. (See Ex. R.)

2. The Disciplinary Charges

209. On June 12, 2025, UCLA subsequently initiated disciplinary proceedings against Petitioner based on his status as a GSJP signatory, alleging that GSJP had promoted and participated in the February 18 demonstration. UCLA asserted that, as a signatory, Petitioner could bear individual responsibility for the organization's activities and charged him with Failure to Comply under Section 102.16 of the Student Conduct Code. A true and correct copy of the Student Conduct Committee Hearing Report concerning this disciplinary matter is attached hereto as **Exhibit R**.

210. The charge was not supported by individualized evidence connecting Petitioner to the demonstration. Petitioner maintained that he neither organized nor participated in the protest and that GSJP did not sponsor it. Multiple witnesses likewise testified that Petitioner was not

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present and that neither GSJP nor its signatories organized, promoted, or controlled the event. (See Ex. R.)

3. The Hearing

211. At the January 20, 2026, hearing, Murotake acknowledged that he had no information establishing that Petitioner was present at the demonstration, no information connecting the @grad_sjpatucla social media account to the Registered Student Organization GSJP, and no information connecting Petitioner to that social media account. Murotake further acknowledged that the *Daily Bruin* article relied upon by UCLA identified neither Petitioner nor GSJP as an organizer of the demonstration. (See Ex. R.)

4. The Committee's Findings

212. Following the hearing, the Student Conduct Committee found insufficient evidence to establish that Petitioner violated University policy. The Committee specifically found no evidence that Petitioner was present at the February 18 demonstration, no evidence that he participated in the event, and no evidence that GSJP organized or planned the protest. It further found insufficient evidence connecting Petitioner to the GSJP Instagram account. Accordingly, the Committee determined that UCLA had failed to establish a violation of Section 102.16.

E. Fourth Disciplinary Matter: May 15, 2025, Nakba Day Protest

1. The Nakba Day Protest

213. On May 15, 2025, pro-Palestinian student organizations and other campus-affiliated groups held a demonstration at UCLA commemorating Nakba Day. Participants peacefully gathered at several locations on campus, delivered speeches, displayed signs and banners, chanted, and marched between locations.

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2. The Disciplinary Charges

214. On June 6, 2025, UCLA initiated disciplinary proceedings against Petitioner arising from the demonstration. UCLA ultimately charged Petitioner with violations of Sections 102.07, 102.13, 102.14, and 102.16 of the Student Conduct Code based on allegations concerning obstruction or disruption, disorderly conduct, disturbing the peace, and failure to comply. A true and correct copy of the Student Conduct Committee Hearing Report concerning this disciplinary matter is attached hereto as **Exhibit S**.

3. The Hearing

215. The Student Conduct Committee held a hearing on October 22, 2025, which continued on November 5, 2025.

216. The evidence presented against Petitioner, however, did not establish his participation in much of the conduct attributed to demonstrators generally. During the hearing, Murotake acknowledged that Petitioner did not appear in the photographic evidence submitted, that he had no information indicating Petitioner used amplified sound or erected any structure, and that only one Student Affairs Mitigator identified Petitioner. (See Ex. S.)

217. Multiple witnesses, including a UCLA professor, likewise testified that Petitioner stood at the edge of the demonstration and acted as an observer and liaison between demonstrators and University personnel. Witnesses testified that Petitioner did not use amplified sound, direct demonstrators, erect structures, block movement, obstruct University officials, or otherwise engage in disruptive conduct. (See Ex. S.)

4. The Committee's Findings

218. On November 20, 2025, the Student Conduct Committee found insufficient evidence to establish that Petitioner violated Sections 102.07, 102.13, or 102.14. The Committee

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nevertheless found Petitioner responsible under Section 102.16 based solely on his failure to present a physical BruinCard upon request. (See Ex. S.)

219. That finding rested on conduct that Murotake acknowledged was not expressly required by the Student Conduct Code: Murotake testified that the Student Conduct Code contains no policy requiring students to carry identification and that Section 102.16 does not specifically state that an individual must furnish an ID. On November 24, 2025, Rush upheld the finding and imposed a formal warning. (See Ex. S.)

220. Viewed collectively, these disciplinary matters reveal a recurring pattern. In each proceeding, Respondents initiated formal disciplinary charges despite significant evidentiary deficiencies, including the absence of individualized evidence that Petitioner personally violated University policy, reliance upon generalized allegations associated with demonstrations, or legal theories that were ultimately rejected by the Student Conduct Committee. Rather than terminating unsupported investigations when those deficiencies became apparent, Respondents repeatedly initiated new disciplinary proceedings arising from Petitioner's participation in pro-Palestinian demonstrations, progressively seeking more severe sanctions despite repeatedly failing to establish substantive protest-related misconduct.

FIRST CAUSE OF ACTION

PETITION FOR WRIT OF ADMINISTRATIVE MANDAMUS
(Code Civ. Proc. § 1094.5)
(Petitioner Against Regents)

221. Petitioner realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as though fully set forth herein.

222. California Code of Civil Procedure §1094.5 authorizes judicial review of "any final administrative order or decision made as the result of a proceeding in which by law a hearing is

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required to be given, evidence is required to be taken, and discretion in the determination of facts is vested in the inferior tribunal, corporation, board, or officer." Cal. Civ. Proc. Code § 1094.5(a).

223. Respondents' final administrative decision suspending Petitioner, imposing disciplinary sanctions, and withholding Petitioner's degree constitutes a final administrative decision subject to judicial review under §1094.5.

224. Judicial review is available to assess "whether the respondent has proceeded without, or in excess of, jurisdiction; whether there was a fair trial; and whether there was any prejudicial abuse of discretion." *Id.*

225. Through a series of disciplinary investigations, hearings, and administrative determinations, Respondents imposed disciplinary findings and sanctions that affected Petitioner's fundamental vested rights, including his continued enrollment, receipt of his graduate degree, access to University facilities, academic standing, and ability to complete his doctoral program.

226. Regents' policies and procedures carry the force and effect of statute. *See Balakrishnan v. Regents of Univ. of Cal.* (2024) 99 Cal.App. 5th 513, 525. Those policies require Respondents to prove alleged violations of the Student Conduct Code by a preponderance of the evidence before imposing disciplinary sanctions.

227. In violation of applicable policies and regulations, Respondents imposed sanctions without proving each of the charges by a preponderance of the evidence for the hearing concerning Petitioner's alleged participation in the November 19, 2024, Bruin Walk demonstration, including allegations that he obstructed pedestrian movement and failed to comply with University directives.

228. Although the panel rejected significant portions of the University's case, it nevertheless found Petitioner responsible under § 102.07 based principally on video footage

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depicting Petitioner's interactions with pedestrians and the panel's conclusion that Petitioner "mirrored" the movements of approaching individuals rather than moving himself or the sign he was holding.

229. The panel did not find that Petitioner physically blocked pedestrian traffic, prevented any individual from passing, disobeyed any instruction from University officials or law enforcement, or otherwise engaged in conduct prohibited by UCLA Interim Policies 850 or 852.

230. Instead, the panel interpreted those policies to require Petitioner affirmatively to reposition himself or his sign whenever another individual approached. Nothing in the text of either policy imposes such a duty. Because courts "give the regulatory language its plain, commonsense meaning," *Akella v. Regents of Univ. of Cal.* (2021) 61 Cal.App.5th 801, 816, Respondents could not expand the scope of the written policies through a disciplinary interpretation unsupported by their text.

231. The gap between the panel's theory and the governing text is apparent on the face of the policies themselves:

a. Policy Text (Interim Policy 850): "[block] entrances to or otherwise interfere with the free flow of campus traffic (pedestrian or vehicular) into and out of campus facilities, or along walkways or roadways."

b. Policy Text (Interim Policy 852): "imped[e] or disrupt[ing] foot and vehicular traffic."

c. Respondents' Theory: that Petitioner was obligated to affirmatively reposition himself or the sign he was holding whenever an approaching individual wished to pass, notwithstanding that other routes remained available and that Petitioner did not himself block, obstruct, or impede anyone's path.

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232. No language in either policy imposes an affirmative duty to reposition oneself or one's expressive materials in response to an approaching pedestrian. The panel's theory is therefore not an application of the text but an extension of it.

233. Nor did the evidence establish that Petitioner actually "interfered with" or "impeded" pedestrian traffic within the meaning of those policies. California courts require restrictions on expressive conduct framed in terms of disruption or interference to be tied to the actual effect of the charged conduct. In *In re Kay* (1970) 1 Cal.3d 930, the California Supreme Court held that whether conduct substantially impairs a protected activity "depends upon the actual impact of that misconduct," and cannot be determined merely from whether others perceived themselves as "disturbed." (*Id.* at pp. 944–945.) Here, the panel did not find that Petitioner prevented any individual from passing, physically blocked available paths of travel, or otherwise actually impeded pedestrian movement. Instead, it imposed liability because Petitioner failed affirmatively to reposition himself or his sign when another individual approached—conduct the written policies do not prohibit.

234. Moreover, the evidence presented did not establish, by a preponderance of the evidence, that Petitioner committed the charged policy violations. *Braxton, supra,* 10 Cal.3d at p. 154 fn.16; *Wong v. Hayakawa* (9th Cir. 1972) 464 F.2d 1282, 1283-1284.

235. By imposing discipline without satisfying their burden of proof and by interpreting the applicable policies beyond their plain language, Respondents proceeded in excess of their jurisdiction and committed a prejudicial abuse of discretion.

236. Respondents also abused their discretion by finding Petitioner responsible under §102.16 based solely on his failure to produce a physical BruinCard.

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237. The evidence established that University officials already knew Petitioner's identity. Nothing in the text of § 102.16 expressly requires a student to produce a physical BruinCard and Respondents failed to establish, by a preponderance of the evidence, that Petitioner violated that provision under the circumstances presented.

238. By imposing disciplinary sanctions notwithstanding the absence of evidence establishing a violation of the applicable policy, Respondents' findings were unsupported by the evidence and constituted a prejudicial abuse of discretion.

239. Among other errors, Respondents failed to provide Petitioner a fair hearing, relied upon unsupported factual findings, selectively credited evidence unfavorable to Petitioner while disregarding exculpatory evidence, presented second-hand testimony rather than producing witnesses for cross-examination, applied University policies in an arbitrary manner, and imposed discipline based upon interpretations of University policies unsupported by their text.

240. On July 10, 2026, Petitioner timely appealed the June 15, 2026, disciplinary decision to the Vice Chancellor of Student Affairs pursuant to the University's Student Conduct Code.

241. The appeal was denied on July 31, 2026. Petitioner files this Petition to preserve his right to judicial review and to challenge the ongoing deprivation of his rights, including the continued suspension, withholding of his degree, and related restrictions.

242. As a direct and proximate result of Respondents' unlawful actions, Petitioner continues to suffer immediate and ongoing irreparable harm.

243. Respondents have:

a. suspended Petitioner for the Summer and Fall 2026 academic quarters

b. withheld Petitioner's earned master's degree;

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c. maintained disciplinary findings and sanctions in his academic record, and;

d. continued to impose restrictions affecting his academic status and educational opportunities.

244. As a consequence of the suspension, Petitioner has already experienced disruption to his graduate student employment, including a University employment record reflecting his separation effective August 15, 2026, and faces the threatened loss of his Fall Quarter Teaching Assistant appointment and the salary, tuition remission, health insurance, and other educational benefits associated with that employment.

245. At the time Respondents imposed the suspension, Petitioner was approximately two academic quarters away from completing his Ph.D. The suspension threatens to prevent him from completing his doctoral degree by disrupting the funding necessary to finish the requisite research, delaying his anticipated graduation, requiring him to seek readmission following the suspension, and placing his continued enrollment in the Ph.D. program at substantial risk because readmission is not guaranteed.

246. Respondents' continued withholding of Petitioner's master's degree further prevents Petitioner from representing earned credentials in employment applications, professional opportunities, and other academic pursuits.

247. Unless the Court grants relief, Petitioner will continue to suffer substantial educational, professional, financial, and reputational harm, for which there is no plain, speedy, or adequate remedy in the ordinary course of law.

248. Accordingly, Petitioner asks for a writ of administrative mandamus ordering Respondents to set aside their disciplinary findings and sanctions and expunge their disciplinary records, consistent with *Wong v. Hayakawa, supra,* 464 F.2d at pp. 1283-1284.

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SECOND CAUSE OF ACTION

PETITION FOR WRIT OF TRADITIONAL MANDATE AND/OR PROHIBITION
(Code Civ. Proc. §§ 1085)
(Petitioner Against Regents)

249. Petitioner realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as though fully set forth herein.

250. As a UCLA graduate student subject to the disciplinary process, Petitioner is directly affected by Respondents' administration of student discipline, and he has a clear, present, and beneficial right to disciplinary proceedings that comport with due process requirements.

251. Respondents have a clear and present ministerial duty to follow UCLA's governing policies and procedures. *(Doe v. Regents of University of California* (2016) 5 Cal.App.5th 1055, 1078.)

252. These policies and procedures permit disciplinary sanctions only on proof of individual responsibility by a preponderance of the evidence. Respondents also have a clear and present ministerial duty to administer disciplinary procedures in accordance with due process of law. (*Doe v. Regents*, *supra*, 5 Cal.App.5th at p. 1078; *Goss*, *supra*, 419 U.S. at pp. 573–574.)

253. As a matter of law, disciplinary findings must be supported by substantial evidence demonstrating that the charged student personally engaged in conduct prohibited by the applicable University policies.

254. Here, the hearing panel did not find that Petitioner physically blocked pedestrian traffic, prevented any individual from passing, disobeyed any directive from University officials or law enforcement, or otherwise engaged in conduct prohibited by UCLA Interim Policies 850 or 852. Instead, it found a policy violation based on Petitioner's failure to reposition himself or his sign as pedestrians approached.

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255. Such findings do not establish, by a preponderance of the evidence, that Petitioner committed the charged policy violations. *Braxton, supra,* 10 Cal.3d at p. 154, fn. 16; *Wong*, *supra*, 464 F.2d at pp. 1283-1284.

256. Respondents likewise failed to establish a violation of §102.16 by substantial evidence. The Student Conduct Committee expressly rejected the allegations that Petitioner violated Sections 102.07, 102.13, and 102.14, yet found Petitioner responsible solely for failing to produce a physical BruinCard.

257. The evidence established that University officials already knew Petitioner's identity, acknowledged that the Student Conduct Code does not require students to carry a physical BruinCard, and further acknowledged that § 102.16 does not expressly require production of a physical identification card.

258. Nevertheless, Respondents imposed disciplinary findings and sanctions by expanding the governing policies beyond their plain language, drawing unsupported conclusions from ambiguous evidence, and failing to satisfy the University's burden of proving the charged violations by a preponderance of the evidence. Viewed together with Respondents' repeated pursuit of unsupported disciplinary allegations arising from Petitioner's pro-Palestinian advocacy, these actions reflect an apparent effort to punish Petitioner for his protected political speech and association.

259. Respondents' repeated initiation and continuation of disciplinary proceedings against Petitioner, despite the recurring absence of individualized evidence and the ultimate dismissal of nearly every protest-related charge, demonstrate a pattern of selective, result-oriented enforcement. Rather than neutrally applying the Student Conduct Code to identified misconduct, Respondents repeatedly sought new theories, expanded allegations, and pursued successive

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proceedings based on substantially the same underlying conduct, reflecting an effort to impose discipline on Petitioner because of his association with pro-Palestinian advocacy.

260. Although several of the disciplinary matters did not ultimately result in sustained findings of protest-related misconduct, those proceedings nevertheless imposed substantial deprivations and burdens on Petitioner. They required him to defend against repeated investigations and hearings, caused prolonged uncertainty concerning his academic and employment status, contributed to his interim suspension and exclusion from campus, delayed conferral of his earned master's degree, interfered with his research, teaching, and degree progress, and chilled his participation in protected political expression and association. The dismissal of the underlying charges did not remedy those harms.

261. At all times, Respondents had, and continue to have, the legal authority and duty to administer student disciplinary proceedings in accordance with the California Constitution, applicable law, and the University's own governing policies and procedures.

262. Throughout the disciplinary proceedings, Petitioner consistently and reasonably objected to the evidentiary and procedural deficiencies in Respondents' case. Among other things, Petitioner challenged the composition of the Hearing Committee, objected to the University's reliance on disputed and inaccurate materials, argued that the evidence failed to establish the charged violations by a preponderance of the evidence, and disputed Respondents' interpretation of the governing University policies.

263. Despite having notice of these evidentiary and procedural deficiencies and the continuing authority to correct them, Respondents continue to enforce disciplinary findings and sanctions unsupported by substantial evidence, maintain Petitioner's suspension, withhold his earned master's degree, and impose continuing restrictions on his academic status and educational

opportunities. Respondents have further refused to remedy the continuing consequences of the unsupported disciplinary proceedings described above, including the academic, professional, financial, and constitutional injuries they caused.

264. Petitioner has no plain, speedy, or adequate remedy in the ordinary course of law except by way of a writ of mandate pursuant to Code of Civil Procedure § 1085.

265. Unless relief is granted, Respondents will continue to enforce the challenged disciplinary determinations, maintain Petitioner's suspension, withhold Petitioner's earned master's degree, jeopardize Petitioner's ability to complete his doctoral degree, and continue to inflict substantial educational, professional, financial, and constitutional harm.

266. Accordingly, Petitioner seeks a writ of mandate and/or prohibition compelling Respondents to comply with the California Constitution, applicable law, and the University's own governing policies and procedures governing student discipline.

267. Specifically, Petitioner seeks an order directing Respondents to vacate the disciplinary findings and sanctions challenged herein because they were imposed without proof sufficient to establish Petitioner's responsibility by a preponderance of the evidence, based upon interpretations of University policies unsupported by their plain language, and in violation of Petitioner's rights to due process.

268. Petitioner further seeks a writ of mandate compelling Respondents to comply with student privacy rights under state and federal law, including article I, section 1 of the California Constitution and the Family Educational Rights and Privacy Act ("FERPA"), 20 U.S.C. section 1232g. During Petitioner's disciplinary hearing, the panel chair disclosed the specific disciplinary allegation pending against Petitioner to a third-party witness without Petitioner's authorization. That same day, Petitioner's advisor submitted a written grievance to Vice Chancellor Gorden, Dean

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Rush, and Dean Oh asserting that the disclosure constituted an unauthorized disclosure of confidential student-conduct information in violation of Petitioner's privacy rights under FERPA and requesting remedial action. Petitioner therefore seeks an order prohibiting Respondents from further disclosing or maintaining Petitioner's protected disciplinary information in violation of applicable privacy requirements and requiring Respondents to remedy the consequences of the unlawful disclosure.

THIRD CAUSE OF ACTION

ARTICLE I, § 2 OF THE CALIFORNIA CONSTITUTION (LIBERTY OF SPEECH) AND AMENDMENT I OF THE UNITED STATES CONSTITUTION (Petitioner Against All Regents)

269. Petitioner realleges and incorporates by reference the allegations contained in the preceding paragraphs as though fully set forth herein.

270. Article I, Section 2 of the California Constitution provides that "every person may freely speak, write and publish his or her sentiments on all subjects, being responsible for the abuse of this right." Cal. Const. art. I, § 2.

271. Amendment I of the United States Constitution, incorporated against the States through the Fourteenth Amendment, prohibits government from abridging the freedom of speech.

272. The First Amendment forbids the government from singling out one side of a debate for disfavored treatment. Viewpoint discrimination is "an egregious form of content discrimination" and is therefore "presumptively unconstitutional." *Rosenberger v. Rector & Visitors of Univ. of Va.* (1995) 515 U.S. 819, 829–30. As the Supreme Court recently reiterated, "[a]t the heart of the First Amendment's Free Speech Clause is the recognition that viewpoint discrimination is uniquely harmful to a free and democratic society." *Nat'l Rifle Ass'n of Am.v. Vullo* (2024) 602 U.S. 175, 187. The California Supreme Court has likewise recognized that content discrimination raises the danger that the government may "effectively drive certain ideas

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or viewpoints from the marketplace" and reaffirmed that, even within otherwise regulable categories of speech, the government generally may not discriminate on the basis of content. *Los Angeles Police Protective League v. City of Los Angeles* (2024) 18 Cal.5th 970, 991–94 (quoting *R.A.V. v. City of St. Paul* (1992) 505 U.S. 377).

273. The First Amendment likewise prohibits state actors from taking adverse action against an individual in retaliation for protected speech or expressive association. As the Supreme Court has explained, "[a]s a general matter the First Amendment prohibits government officials from subjecting an individual to retaliatory actions" for engaging in protected speech. *Hartman v. Moore* (2006) 547 U.S. 250, 256. When a state actor takes adverse action against an individual because of protected speech, the injured individual may seek relief for First Amendment retaliation. *Nieves v. Bartlett* (2019) 587 U.S. 391, 398.

274. Article I, Section 2 of the California Constitution provides broader protection for expressive activity than the First Amendment. As the California Court of Appeal has recognized, the California liberty of speech clause "is broader and more protective than the free-speech clause of the First Amendment." (*Prigmore*, *supra*, 211 Cal.App.4th at p. 1336, quoting *Los Angeles Alliance*, *supra*, 22 Cal.4th at pp. 366–367.) Accordingly, Respondents' actions violated not only Petitioner's rights under the First Amendment but also the independent and broader protections guaranteed by article I, section 2 of the California Constitution.

A. Viewpoint Discrimination

275. Under California law, "[t]he principal inquiry in determining content neutrality . . . is whether the government has adopted a regulation of speech because of disagreement with the message it conveys." *Fashion Valley Mall, LLC v. National Labor Relations Bd.* (2007) 42 Cal.4th 850, 866. As alleged herein, Respondents' selective enforcement and application of facially neutral

University policies against Petitioner's pro-Palestinian speech and expressive association were motivated by disagreement with the content and viewpoint of that protected expression.

276. Petitioner engaged in protected expressive activity when he participated in demonstrations concerning Palestine, including the November 19, 2024, Bruin Walk Protest and others, advocated for Palestinian rights, communicated with University officials concerning those demonstrations, associated with students, faculty, staff, and community members sharing those views, and otherwise engaged in speech on matters of public concern.

277. Respondents repeatedly subjected Petitioner to investigation and disciplinary proceedings arising from his participation in and association with pro-Palestinian expressive activity. As alleged above, several of those proceedings ultimately resulted in findings of insufficient evidence, yet Respondents continued to investigate and charge Petitioner in connection with subsequent pro-Palestinian demonstrations. Respondents ultimately imposed an interim suspension and campus exclusion and, following the November 19, 2024 Bruin Walk matter, a two-quarter suspension.

278. Respondents' selective enforcement is illustrated by their substantially harsher treatment of Petitioner than other UCLA students and student organizations disciplined for more serious conduct unrelated to pro-Palestinian advocacy. As reflected in **Exhibit N**, UCLA imposed probation and educational measures, not suspension, on student organizations found responsible for conduct involving hazing, threats of harm, physical punishment, and dangerous alcohol consumption. By contrast, Respondents imposed a two-quarter suspension on Petitioner arising from the Bruin Walk protest, even though the Hearing Committee found that Petitioner complied with instructions from UCPD and University personnel, did not interfere with an educational program, was not an organizer, and engaged in no physical violence or contact. (See Ex. N.) This

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disparity supports an inference that Respondents' substantially harsher treatment of Petitioner was attributable to the content and viewpoint of his protected expression rather than a legitimate, content-neutral distinction.

279. The record further supports the inference of viewpoint discrimination. Respondents' internal communications characterized Petitioner as a "known organizer," a "central figure," and a "special, stand out type of conduct violation," urged "firm and immediate action," and coordinated efforts to pursue an interim suspension notwithstanding repeated findings that prior protest-related charges were unsupported by sufficient evidence. Consistent with those communications, Respondents selectively enforced and expansively interpreted University policies against Petitioner and repeatedly pursued disciplinary proceedings unsupported by substantial evidence.

280. Respondents also violated Petitioner's rights under Article I, section 2 of the California Constitution and the First Amendment by interpreting and applying facially neutral University policies governing demonstrations and pedestrian movement to punish Petitioner's peaceful political expression, expressive association, and participation in campus demonstrations, notwithstanding the disciplinary record's failure to establish that Petitioner personally obstructed pedestrian movement, disobeyed lawful directives, or otherwise engaged in conduct sufficient to justify restricting protected expression. Such an application of University policies impermissibly burdened protected speech in violation of the California and United States Constitutions. *Braxton, supra*, 10 Cal.3d at pp. 146, 151; *Healy, supra,* 408 U.S. at pp. 180–181; *Tinker, supra,* 393 U.S. at p. 509.

281. Taken together, Respondents' disparate treatment of Petitioner, repeated pursuit of unsupported charges, and internal communications support an inference that Respondents engaged

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in viewpoint discrimination based on Petitioner's protected speech, expressive association, and perceived role in pro-Palestinian advocacy.

B. Retaliation for Protected Speech and Association

282. The First Amendment prohibits state actors from taking adverse action against an individual in retaliation for protected speech or expressive association. As the Supreme Court has explained, "[a]s a general matter the First Amendment prohibits government officials from subjecting an individual to retaliatory actions" for engaging in protected speech. *Hartman v. Moore* (2006) 547 U.S. 250, 256. When a state actor takes adverse action against an individual because of protected speech, the injured individual may seek relief for First Amendment retaliation. *Nieves v. Bartlett* (2019) 587 U.S. 391, 398.

283. Petitioner engaged in protected speech and expressive association through his advocacy concerning Palestine, participation in campus demonstrations, association with pro-Palestinian students and organizations, and communications with University officials concerning those activities.

284. Respondents subjected Petitioner to repeated investigations and disciplinary proceedings, interim suspension, campus exclusion, and ultimately a two-quarter suspension. These actions would chill a person of ordinary firmness from engaging in protected speech and expressive association.

285. Respondents' adverse actions were motivated by Petitioner's protected expression and association. As alleged above, Respondents repeatedly pursued Petitioner in connection with pro-Palestinian demonstrations despite findings of insufficient evidence in prior proceedings; internally identified him based on his perceived role as a pro-Palestinian organizer; urged "firm and immediate action" against him; and ultimately escalated their response to interim suspension,

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campus exclusion, and a two-quarter suspension. The pattern of enforcement, disparate treatment, and Respondents' internal communications support an inference that Petitioner's protected speech and association were substantial or motivating factors in Respondents' adverse actions.

286. As a direct and proximate result of Respondents' actions, Petitioner has suffered and continues to suffer irreparable injury, including the deprivation of his constitutional rights, suspension from the University, the continued withholding of his earned master's degree, interference with his ability to complete the remaining academic requirements for his doctoral degree, reputational harm, emotional distress, and other damages according to proof. Respondents' actions have also chilled and deterred, and continue to chill and deter, Petitioner from the full exercise of his constitutionally protected rights at UCLA for fear of further disciplinary action and other adverse consequences.

FOURTH CAUSE OF ACTION

ARTICLE I, § 7 OF THE CALIFORNIA CONSTITUTION AND FOURTEENTH AMENDMENT OF THE UNITED STATES CONSTITUTION (DUE PROCESS)
(Petitioner Against Regents)

287. Petitioner realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as though fully set forth herein.

288. The Fourteenth Amendment to the United States Constitution provides that no State shall "deprive any person of life, liberty, or property, without due process of law." U.S. Const. amend. XIV, § 1. Due process "is flexible and calls for such procedural protections as the particular situation demands." *Mathews v. Eldridge* (1976) 424 U.S. 319, 334. In the public-school disciplinary context, the Supreme Court has held that a student facing suspension must be afforded "notice and an opportunity for hearing appropriate to the nature of the case." *Goss v. Lopez* (1975) 419 U.S. 565, 579.

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289. The State corollary of the Fourteenth Amendment, Article I, Section 7 of the California Constitution provides that "[a] person may not be deprived of life, liberty, or property without due process of law." Cal. Const. art. I, § 7.

290. Petitioner possessed protected liberty and property interests in his continued enrollment at UCLA, his academic standing, his earned master's degree, his ability to complete the remaining requirements for his doctoral degree, his reputation, and his educational and professional opportunities.

291. Respondents violated Petitioner's due process rights by imposing and maintaining an interim suspension that excluded Petitioner from campus, deprived him of access to classes, research, University facilities, and academic opportunities, and remained in effect for hundreds of days before the completion of constitutionally adequate disciplinary proceedings.

292. Respondents further violated Petitioner's due process rights by imposing the June 6, 2025 interim suspension and campus exclusion without providing Petitioner prior notice of the specific evidence supporting it or a meaningful opportunity to be heard before its imposition, in the absence of any individualized emergency justifying that departure from ordinary process.

293. When Petitioner did receive a post-imposition appeal meeting on June 10, 2025, University officials proceeded without having provided him the underlying case file or evidentiary materials supporting the suspension, requiring the meeting to be paused so that Petitioner could obtain the materials necessary to respond to the allegations against him, confirming that no adequate opportunity to be heard had been afforded before the suspension took effect.

294. The suspension excluded Petitioner entirely from campus, University housing-adjacent facilities, classes, research, and University activities, notwithstanding that no finding in any of the five underlying disciplinary matters ever established that Petitioner engaged in violence,

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threats, or conduct posing a safety risk, which is the specific predicate PACAOS §107.00 requires for an interim suspension. The suspension was neither individualized to an actual emergency nor narrowly tailored to the minimum restriction necessary to address any risk Respondents identified.

295. Respondents further violated Petitioner's due process rights by:

a. initiating disciplinary proceedings under policies that were not in effect at the time of the alleged conduct;

b. withholding exculpatory evidence, investigative materials, and other relevant information material do his defense;

c. failing to provide Petitioner with a complete and accurate hearing record;

d. omitting relevant evidence from the hearing packet;

e. relying on disputed, inaccurate, and incomplete materials;

f. denying Petitioner's procedural objections, including his objections to the composition of the Hearing Committee and the contents of the hearing materials;

g. limiting Petitioner's ability to present witnesses and other evidence in his defense;

h. denying Petitioner's request for protective measures despite documented threats arising from his political advocacy;

i. disclosing Petitioner's confidential disciplinary information to a third-party witness during the hearing without Petitioner's authorization, which Petitioner challenged as violating his policy rights, including under the Family Educational Rights and Privacy Act, 20 U.S.C. § 1232g;

j. interpreting University policies beyond their plain language;

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k. selectively applying vague and undefined policy language in a manner that failed to provide fair notice and permitted arbitrary enforcement;

l. and imposing disciplinary findings and sanctions without proving the charged violations by a preponderance of the evidence.

296. Respondents further denied Petitioner due process and fair notice by interpreting the terms "interfere" and "impede" in UCLA Interim Policies 850 and 852 to impose an affirmative obligation nowhere stated in either policy. Nothing in those policies provided reasonable notice that a student who did not physically block or prevent pedestrian passage was nevertheless required to reposition himself or his expressive materials whenever another individual approached. Respondents' expansive interpretation therefore failed to provide Petitioner fair notice of the conduct subject to discipline and permitted arbitrary and discriminatory enforcement. *See People v. Heitzman* (1994) 9 Cal.4th 189, 199–200.

297. On information and belief, Respondents continued to violate Petitioner's due process rights by maintaining the challenged disciplinary findings and sanctions, continuing Petitioner's suspension, withholding Petitioner's earned master's degree, and refusing to correct the foregoing constitutional and procedural deficiencies despite Petitioner's repeated objections throughout the disciplinary proceedings and his timely administrative appeal.

298. Respondents violated Petitioner's due process rights by imposing an interim suspension of indefinite duration, informing Petitioner only that the suspension would remain in effect pending the completion of the University's disciplinary proceedings, without providing any meaningful opportunity to obtain review of the continuing necessity of that suspension.

299. As a result, Petitioner remained suspended for approximately 291 days, was excluded from campus and University facilities, was unable to obtain conferral of his earned

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master's degree, and was prevented from completing the remaining academic requirements for his doctoral program, all before Respondents established the disciplinary charges against him through constitutionally adequate procedures. Following imposition of the challenged suspension, Respondents placed additional holds on Petitioner's student account that prevent him from enrolling, receiving grades or a diploma, obtaining transcripts, and accessing University services, further impairing his academic and professional opportunities.

300. Petitioner intends to complete his doctoral studies at UCLA and to continue exercising his constitutional rights to speak, assemble, and engage in expressive activity on matters of public concern. Unless enjoined by this Court, Respondents' continuing enforcement of the challenged disciplinary findings and sanctions, withholding of Petitioner's earned master's degree, and maintenance of his suspension will continue to impair Petitioner's education, chill his protected expression, and cause irreparable harm.

301. Petitioner has no plain, speedy, or adequate remedy at law to redress the continuing deprivation of his constitutional rights, the ongoing withholding of his earned master's degree, the continuing impairment of his ability to complete his doctoral studies, and the continuing enforcement of the challenged disciplinary findings and sanctions.

302. Petitioner therefore seeks a declaration, injunction, and other equitable relief from this Court.

FIFTH CAUSE OF ACTION

CAL. CIV. CODE § 52.1, TOM BANE CIVIL RIGHTS ACT
(Petitioner Against All Respondents)

303. Petitioner realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as though fully set forth herein.

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304. California Civil Code section 52.1 ("Tom Bane Civil Rights Act") prohibits any "person or persons, whether or not acting under color of law," from interfering "by threat, intimidation, or coercion" with the "exercise or enjoyment by any individual or individuals of rights secured by the Constitution or laws of the United States, or of the rights secured by the Constitution or laws of this state." Cal. Civ. Code § 52.1.

305. An interim suspension and campus exclusion order imposed without legal justification can itself constitute "threat, intimidation, or coercion" within the meaning of Civil Code section 52.1, because such an order restricts a student's physical presence on campus and threatens his academic standing, housing, and future prospects, creating coercive pressure to abandon constitutionally protected activity. Conduct of this kind is coercive if it "would chill a person of ordinary firmness from further engagement in protected speech." *Leos v. City of El Monte*, No. CV 23-2427-KK-JPRx, 2024 U.S. Dist. LEXIS 195659, at *12 (C.D. Cal. Oct. 28, 2024). No showing of violence or physical force is required. *Id.*

306. Nor does Petitioner's Bane Act claim require proof that any Respondent was subjectively aware his conduct violated Petitioner's constitutional rights; specific intent under section 52.1 requires only that the act was undertaken deliberately, not accidentally. *People v. Lashley* (1991) 1 Cal.App.4th 938; *Cornell v. City & County of San Francisco* (2017) 17 Cal.App.5th 766, 803.

307. In addition to the disciplinary process itself, Respondents engaged in conduct independently intended to threaten, intimidate, or coerce Petitioner into abandoning his protected advocacy. Specifically, Respondents: (a) internally designated Petitioner a "known organizer" and "central figure" and used that designation to justify accelerated and heightened disciplinary measures not applied to similarly situated students; (b) Nieves personally advanced, and the

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panel adopted, a theory of liability appearing nowhere in the text of any University policy, without prior disclosure to Petitioner; (c) Nieves personally withheld from Petitioner a copy of video evidence Respondents intended to, and did, rely upon at the hearing, permitting Petitioner to view it only in Nieves' presence; (d) Murotake personally issued charges premised on a policy Murotake later acknowledged was not in effect at the time of the alleged conduct, and personally delayed finalizing meeting notes Petitioner was entitled to review and correct, while continuing to advance the disciplinary process against him; and (e) private security guard employees used pictures of Petitioner as their home screen on their phones, called Petitioner over to tell him that they knew who he and his family were, and laughed when Petitioner asked about it.

308. UC Regent Jay Sures sued Petitioner individually repeating the same language above calling him a "ring leader" of an antisemitic mob. Mr. Sures lost his lawsuit and was required to pay Petitioner's attorney fees on May 30, 2025. One week later, Respondents placed Petitioner on interim suspension.

309. These acts were independent of, and went beyond, the disciplinary proceedings challenged in the First, Second, and Fourth Causes of Action, and were undertaken for the purpose of deterring Petitioner from continuing his pro-Palestinian advocacy.

310. Respondents interfered by threat, intimidation, and coercion with Petitioner's exercise and enjoyment of his rights to speech, expression, assembly, association, and petition guaranteed by the Constitution of the State of California by repeatedly initiating unsupported disciplinary proceedings against him due to his anti-genocide, pro-Palestine protest; imposing and maintaining an interim suspension and campus exclusion in violation of its own policies that barred him from attending classes, entering University property, teaching, conducting research, and participating in University life; withholding Petitioner's earned master's degree; threatening his

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continued enrollment, employment, funding, and academic progress; and using these punitive measures to deter and punish Petitioner's participation in other protected pro-Palestinian advocacy.

311. These actions were undertaken after University officials internally identified Petitioner as a "known organizer," a "central figure," and a "special, stand out type of conduct violation," advocated "firm and immediate action," and discussed imposing an interim suspension despite repeatedly failing to establish misconduct through prior disciplinary proceedings.

312. Respondent Chobanian, UCPD Captain, personally and independently engaged in threatening, intimidating, and coercive conduct in violation of Civil Code section 52.1. Chobanian stated that Petitioner should be banned from campus based on Petitioner's "disregard for university authority," "longstanding pattern of defiance," and conduct that "undermine[s] institutional authority," and further characterized Petitioner as having engaged in "repeated violations of university policy" that "disrupt the campus community and create environments of disruption, intimidation, and disorder." Chobanian made these statements in his capacity as the head of the University's police force, and his recommendation was a direct and substantial contributing cause of the June 6, 2025 interim suspension and total campus exclusion order imposed on Petitioner.

313. Chobanian's statement identified no specific incident of violence, threat, or safety risk attributable to Petitioner, as required to support an interim suspension under PACAOS § 107.00. At the time Chobanian made these statements, none of the disciplinary matters then pending against Petitioner had yet been adjudicated, and each was later resolved with a finding of no responsibility except for the failure to present ID and the Bruin Walk novel affirmative duty theory case.

314. No disciplinary finding, before or after Chobanian's statement, ever established that Petitioner engaged in intimidating conduct or created disorder. Chobanian's invocation of his law

enforcement authority to recommend a total campus ban based on Petitioner's ideological non-compliance and defiance of institutional authority, rather than any safety-based justification, constituted a threat, intimidation, and coercion within the meaning of Civil Code section 52.1, undertaken with the intent to interfere with Petitioner's rights of free expression and association under Article I, Sections 2 and 3 of the California Constitution.

315. Nieves, Murotake, and Chobanian are directly and personally liable under Civil Code section 52.1 for the acts alleged in this Fifth Cause of Action, independent of any liability of the Regents. Nieves, Murotake, and Chobanian acted within the course and scope of their employment by the Regents at all times relevant to this Fifth Cause of Action; the Regents are therefore also vicariously liable under Government Code section 815.2 for the compensatory damages caused by those acts. Petitioner seeks compensatory and statutory damages against Nieves, Murotake, Chobanian, and the Regents on these respective direct and vicarious theories. Petitioner further seeks punitive damages against Nieves, Murotake, and Chobanian in their individual capacities only; Petitioner does not seek, and acknowledges the Regents' immunity from, punitive damages against the Regents under Government Code section 818.

316. Respondents Nieves and Murotake are not entitled to discretionary act immunity under Government Code section 820.2 for the acts alleged herein. Section 820.2 immunizes only "basic policy decisions which have been expressly committed to coordinate branches of government, and as to which judicial interference would thus be unseemly." *Caldwell v. Montoya* (1995) 10 Cal.4th 972, 981.

317. It does not immunize "lower-level, or 'ministerial,' decisions that merely implement a basic policy already formulated." *Id.* Nieves' and Murotake's specific acts alleged above, disclosing confidential disciplinary material outside authorized channels, charging

Petitioner under a policy not yet in effect, withholding evidence Petitioner was procedurally entitled to review, and advancing an undisclosed theory of liability with no basis in any written policy, were failures to follow the University's own mandatory, non-discretionary procedures, not the exercise of discretion vested in them. *See Regents of Univ. of Cal. v. Superior Court* (2018) 29 Cal.App.5th 890, 915–16 (distinguishing an institution's discretionary decision to create disciplinary programs and protocols from the ministerial execution of those programs against an individual student). Nieves and Murotake are therefore not immune from liability under section 820.2, and the Regents are vicariously liable for their acts under Government Code section 815.2.

318. Chobanian is not entitled to discretionary act immunity under Government Code section 820.2 for the conduct alleged above. PACAOS § 105.08 vests authority to impose an interim suspension in the Vice Chancellor for Student Affairs or designee, not in UCPD. Section 820.2 immunizes the exercise of discretion actually vested in a public employee by law; it does not immunize a law enforcement officer's unilateral recommendation, based on a student's ideological non-compliance, made outside the scope of any decision-making authority conferred on him by University policy. Chobanian's conduct therefore falls outside the discretion section 820.2 protects, and the Regents are vicariously liable for his acts under Government Code section 815.2.

319. As a direct and proximate result of Respondents' actions, Petitioner has suffered harm in the form of general and special damages in an amount according to proof, including but not limited to the deprivation of constitutional rights, suspension from the University, continued withholding of his earned master's degree, interference with his ability to complete his doctoral studies, emotional distress, reputational harm, and other damages according to proof.

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320. Absent declaratory and injunctive relief, Respondents' actions will continue to harm Petitioner by maintaining the challenged disciplinary findings and sanctions, withholding Petitioner's earned master's degree, preventing Petitioner from completing his doctoral studies, and burdening Petitioner's exercise of his constitutional rights.

REQUEST FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court enter judgment in his favor and against Respondents on all causes of action, and:

a. Issue a writ of administrative mandamus pursuant to California Code of Civil Procedure section 1094.5 directing Respondents to vacate the challenged disciplinary findings and sanctions, set aside the disciplinary decisions, and rescind Petitioner's suspension;

b. Issue a writ of traditional mandate, pursuant to Code of Civil Procedure section 1085, requiring Respondents to administer student disciplinary proceedings in accordance with the California Constitution, applicable law, and UCLA's own policies and procedures; to refrain from imposing disciplinary sanctions absent proof of individual responsibility by a preponderance of the evidence; to interpret and apply University policies according to their plain language rather than through unsupported or expansive interpretations; to cease imposing discipline based upon protected speech, viewpoint, or association; to cease attributing the conduct of student organizations or other individuals to Petitioner absent individualized proof; to restore Petitioner's academic standing and eligibility for graduate student employment and enrollment; and to confer Petitioner's earned master's degree;

c. Issue a declaration that Respondents' policies and practices of imposing disciplinary sanctions without proof of individual responsibility by a preponderance of the evidence; expanding the scope of University policies beyond their plain language; attributing the

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conduct of student organizations or other individuals to Petitioner without individualized proof; and imposing discipline based upon a student's protected speech, viewpoint, or association are unlawful.

d. Issue an injunction ordering Respondents to vacate and expunge the challenged disciplinary findings and sanctions from Petitioner's disciplinary and academic records; prohibiting Respondents from continuing to enforce the challenged suspension or withhold Petitioner's earned master's degree based upon those findings; requiring Respondents to restore Petitioner's academic standing, eligibility for enrollment, graduate student employment, and eligibility to complete the remaining requirements for his doctoral degree without requiring Petitioner to reapply for admission or otherwise suffer adverse academic consequences resulting from the challenged disciplinary proceedings; prohibiting Respondents from imposing disciplinary sanctions absent proof, by a preponderance of the evidence, of individual responsibility for the charged conduct, from expanding the scope of University policies beyond their plain language, and from imposing discipline based upon a student's protected speech, viewpoint, message, or association; and requiring Respondents to conform their conduct to the law.

e. Require Respondents to make reasonable efforts to assist Petitioner, who has been disadvantaged with respect to employment and academic status as a result of the unjustified disciplinary proceedings and suspension, in accordance with the University's commitment under PACAOS 105.08, including restoring Petitioner's academic standing, graduate student employment opportunities, eligibility to complete his doctoral degree, and conferring Petitioner's earned master's degree.

f. Award Petitioner all damages authorized by law, including compensatory damages, nominal damages where appropriate, statutory damages and civil penalties where

authorized, and punitive damages against any individual Respondents to the extent permitted by law;

g. Petitioner seeks compensatory and statutory damages against Nieves, Murotake, Chobanian and the Regents on direct and vicarious liability theories under the Bane Act.

h. Petitioner further seeks punitive damages against Nieves, Murotake, and Chobanian in their individual capacities only under the Bane Act; Petitioner does not seek, and acknowledges the Regents' immunity from, punitive damages against the Regents under Government Code section 818.

i. Award Petitioner reasonable attorneys' fees and costs pursuant to California Civil Code § 52.1, Code of Civil Procedure § 1021.5, and any other applicable provision of law; and

j. Retain jurisdiction to this Court to oversee Defendants/Respondents' compliance with the Court's orders; and

k. Grant such other and further relief the Court deems just and proper.

Dated: August 25, 2026

Respectfully submitted,

AMERICAN-ARAB
ANTI-DISCRIMINATION COMMITTEE (ADC)

By: /s/Malak Afaneh
Malak Afaneh *(pro hac vice forthcoming)*

By: /s/Jenin Younes
Jenin Younes *(pro hac vice forthcoming)*

LAW OFFICES OF THOMAS B. HARVEY

By: /s/Thomas B. Harvey
Thomas B. Harvey

LAW OFFICES OF BEN GHARAGOZLI

By: /s/Ben Gharagozli
Ben Gharagozli

Attorneys for Plaintiff/Petitioner

VERIFICATION OF DYLAN KUPSH

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I have read the foregoing VERIFIED PETITION FOR WRIT OF MANDATE AND COMPLAINT.

I am the petitioner/plaintiff in this action, Dylan Kupsh. I am informed and believe, and on that basis, allege that the matters stated in the foregoing document are true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed at Los Angeles, California, this 25th day of August, 2026.

Dylan Kupsh

Dylan Kupsh

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EXHIBIT A

NOTICE REGARDING VIDEO RECORDING

Exhibit A consists of a video recording from November 19, 2024, referenced in the Petition.

Because Exhibit A is a digital video file and cannot be included within the PDF exhibits submitted with the Petition, Petitioner will lodge or otherwise provide a true and correct copy of the video recording to the Court and Respondents in accordance with the Court's applicable procedures for submission of digital evidence, or in such form and manner as the Court may direct.

The video recording is designated as **Exhibit A**.

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EXHIBIT B



yellow/green safety vests. At approximately 1:30pm, the protestors began interlinking arms and forming a line across Bruin Walk.

At approximately 1:32pm, Mr. Kupsh is observed on CSS and BWC video footage standing several feet behind the line of protestors blocking Bruin Walk carrying a green sign bearing Arabic writing and the words "BY SOUL, BY BLOOD." At approximately 1:33pm, Student Affairs Mediator (SAM) Chett Miller advised Mr. Kupsh that the human blockade that had been formed violated UCLA policy and was unlawful. On BWC video footage Mr. Miller is heard advising Mr. Kupsh that "students can't get to their car" and "students can't get by you." At that time another SAM is heard stating "No more conversations." As Mr. Miller and the other SAM attempted to leave, they were physically blocked by protestors and had to climb through adjacent bushes to leave the area. At approximately 1:34pm, Mr. Kupsh, still holding the green sign while facing east and standing behind the line of protestors blocking the walkway, is observed on BWC video footage being approached by two individuals wearing backpacks who appear to be talking with him. The two individuals then turn and walk away from the blocking line. A few minutes later Mr. Kupsh is observed to move the green sign in front of three to four other individuals who were trying to get through the blockade. These individuals turned and walked away.

Per UCPD reports, at approximately 1:48pm Mr. Kupsh and two other apparent organizers were advised by two UCPD officers that the blockade was unlawful, that the blockade needed to disperse, and that the group could continue their peaceful protest in Bruin Plaza. Mr. Kupsh claimed that he was not an event organizer and that he could relay messages to the individuals in the blockade.

Between approximately 1:48pm and 2:18pm, Mr. Kupsh is observed on CSS and BWC video footage walking back and forth in front of and behind the line of protestors blocking access to Bruin Walk, frequently stopping and apparently conversing with other individuals who were wearing the yellow/green safety vests. At approximately 2:21pm, the line of protestors blocking Bruin Walk began to move to Bruin Plaza where they marched in a circular formation around the plaza.

At approximately 2:22pm, Mr. Kupsh is observed on BWC video footage walking up Bruin Walk toward a UCPD squad which had formed at the crest of Bruin Walk. Mr. Kupsh is observed repeatedly asking officers: "Are you the commanding officer?"
At approximately 2:23pm, the UCPD squad began moving westbound down the hill toward the base of Bruin Walk. Mr. Kupsh is observed on BWC video footage walking down hill ahead of the UCPD squad. Mr. Kupsh is observed walking with a male individual who appears to be using a cell phone to video record the movement of the UCPD officers.

At approximately 2:24pm, a male individual wearing a yellow/green safety vest is observed on BWC video footage leading the marching protestors on Bruin Plaza in yelling the following chants: "Free! Free! Free Palestine!" "Cops off campus!" and "UCPD. KKK. IOF. You're all the same!" Mr. Kupsh is observed walking back and forth in front of the police line which had formed at the base of Bruin Walk. At approximately 2:24pm, a UCPD lieutenant is observed greeting Mr. Kupsh and advising him to wait a minute before walking back up Bruin Walk so the police line can be opened. At approximately 2:29pm, the police line across the base of Bruin Walk was opened up and Mr. Kupsh is observed walking up Bruin Walk. At approximately 2:30pm, the UCPD lieutenant is observed telling Mr. Kupsh: "I said keep it open so people can walk. That's what I'm telling you. Keep it open. Do not block it so people can walk. Right?" Mr. Kupsh is observed stating: "I was never blocking it." At approximately 2:31pm, a small group of protestors appear to be standing in front of and momentarily impeding the police lieutenant at the base of Bruin Walk. The police lieutenant is observed addressing Mr. Kupsh by stating: "Dylan, this has to stop. I got to be able to walk through." Mr. Kupsh replied: "You were able to walk through." The lieutenant responded: "Because I have to stop because they moved."

At approximately 2:35pm, on BWC video footage a female protestor in pink clothing is observed standing in front of a UCPD sergeant holding a cell phone in front of the sergeant's face and the sergeant in turn holds his cell phone up in front of the protestor. Mr. Kupsh is observed confronting the sergeant and repeatedly asking about whether there is a policy about holding a cell phone in someone's face. At approximately 2:38pm and after appearing to confer with a male individual wearing a light green National Lawyers Guild hat and several individuals wearing the yellow/green safety vests, Mr. Kupsh is observed on BWC video footage approaching a UCPD lieutenant and asking: "I wanted to ask about university policy. If you put a phone in somebody's face as an officer, is that like a policy?" Mr. Kupsh is observed to repeatedly ask the officer about university policy.

From approximately 2:38pm to 2:58pm, Mr. Kupsh is observed on BWC video footage walking back and forth in the area at the base of Bruin Walk near Bruin Plaza. During this time Mr. Kupsh is observed to repeatedly be conferring with various individuals wearing yellow/green safety vests as well as individuals wearing light green National Lawyers Guild hats. At approximately 3:01pm, the protestors marching around Bruin Plaza began to disperse. At approximately 3:29pm, Mr. Kupsh is observed on BWC video footage walking across Bruin Plaza toward a small group of protestors gathered near the base of Bruin Walk.

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EXHIBIT C

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To: Office of Student Conduct

Fr: Sergeant Adrian Anderson

Re: Incident Summary (Report No. 24-2234)

Date of Incident:	11/19/2024
Time of Incident:	Approximately 1:00 PM to 2:00 PM
Location:	Bruin Walk

Synopsis

On 11/19/2024 at about 1:00 PM, UCLA Students for Justice in Palestine (SJP) began a protest in Bruin Plaza for the "Nationwide Student Strike March Against Genocide". The protest marched through the campus, utilizing amplified sound, then returned to Bruin Plaza at about 1:30PM. At this time, some protestors marched in a circle in the center of the plaza, while others formed a human blockade across the pathway of Bruin walk between Ackerman Union and the Student Activities Center. This blocked all east and westbound pedestrian traffic on Bruin Walk. Pedestrians were detoured around the above buildings, and some had to climb through bushes to pass the blockade. Security footage estimated hundreds of pedestrians affected by the blockade in under an hour.

Utilizing the tiered response model, UCLA Student Affairs Mitigators arrived on scene to speak with members of the group. The SAMs themselves were blocked from passage at times. SAMs Jason Zeck and Chett Miller spoke with 3 subjects, including [redacted], who they recognized from prior contacts. They advised the subjects the blockage was in violation of policy and needed to allow free movement of pedestrians. SAMs had observed students being physically pushed by members of the blockade, and observed at least one female student in tears. The group did not move after the SAMs request and maintained their blockade.

Next, UCPD representatives met with members of the group, including Dylan Kupsh and [redacted]. Kupsh claimed not to be an event organizer, but stated he could relay messages. UCPD advised the group the blockade was unlawful and needed to stop, but that the group could continue their demonstration in the center of the plaza. The group did not change behavior after the verbal warning and maintained the blockade.

As UCPD officers staged to address the blockade, video surveillance was reviewed, and a number of suspects along the blockade line were identified as suspects who were in violation of PC 647c – Obstructing a Public Way. This included two UCLA students who were later arrested for the violation. Ultimately, the human blockade refused to disperse until UCPD officers arrived in a mobile field force formation and marched toward the line at approximately 2:15PM. At that time, the blockade finally dispersed.

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From: dean@saonet.ucla.edu
To: Rush, Jasmine
Subject: New public report has been submitted
Date: Monday, December 2, 2024 11:08:46 AM

A new public report has been submitted.

Please use the link to view the report: https://ucla-advocate.symplicity.com/incident/06482-2024
Student(s) Involved: Dylan Kupsh (known individual with whom we made contact but not necessarily involved in the incident)

10/17/2025

EXHIBIT D

Complaint—November 20, 2024

On November 19, 2024, Students for Justice in Palestine organized a major protest that lasted several hours on campus.

The protest ended with a "picket-line" in Bruin Plaza in which protesters linked arms and blocked access to Bruin Walk.

The general sequence of events was reported in the Daily Bruin here:
https://dailybruin.com/2024/11/19/pro-palestine-protesters-walk-out-in-response-to-national-call-ucpd-arrests-3

This is a video showing [redacted], a Jewish undergraduate student being denied access to Bruin Walk:
https://www.instagram.com/reel/DCkwYiWviEq/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==

One of the individuals organizing the blockade and physically blocking [redacted] is Dylan Kupsh, one of the leaders of SJP. An identifying photo from the video is here:

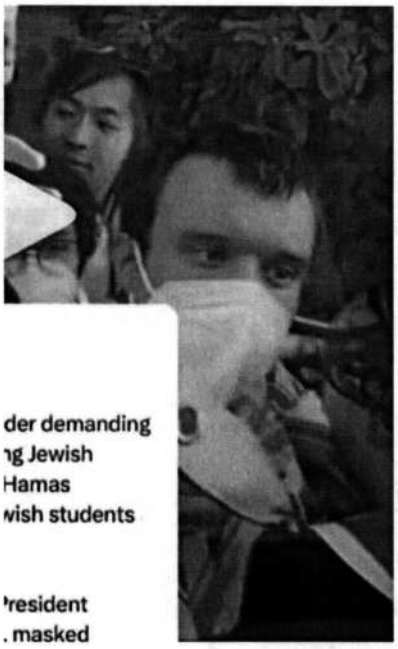


EXHIBIT E

10/12/2026

University of California, Los Angeles
Student Conduct Committee Hearing Report
In re: Dylan Kupsh

I. Allegations

In a letter dated April 6, 2026, Assistant Dean of Students, Benito Nieves (Dean Nieves), notified student Dylan Kupsh (Kupsh) that Kupsh was being charged with allegedly violating the *UCLA Student Conduct Code,* Section 102.16 (Failure to Comply) and 102.07 (Violations of University Policy) specifically, Section IV.A. of the *UCLA Interim Policy 850: General Use of UCLA Property*, Section IV. of the *UCLA Interim Policy 852: Public Expression Activities*, and Section III. of *UCLA Interim Policy 860: Organized Events*:

> "Specifically, it has been reported that on or around November 19, 2024, near Bruin Walk and during an unauthorized event, you participated in public expression activity in a manner that was not in compliance with University policy; specifically, it is alleged you participated in creating a human blockade that blocked all east and westbound pedestrian traffic on Bruin Walk. It is additionally reported that you blocked an individual from moving through bushes by physically positioning yourself in front of the individual and mirroring their movements for the purpose of preventing the individual to get by. It is additionally reported that when instructed by a University official to either relocate or allow others to get by you, you did not comply with the instruction. It is additionally reported that you may have organized the unauthorized event."

II. The Hearing

A Hearing was held on April 23, 2026, and continued on May 5, 2026, and May 20, 2026, to consider the allegations and determine whether, by a preponderance of the information presented, it was more likely than not that there was a violation by Kupsh.

The Student Conduct Committee Hearing Panel (Panel) was chaired by [redacted] and included [redacted] and [redacted]. All participants participated over Zoom.

Alex Dring served as the Hearing Administrator.

Associate Dean of Students, Benito Nieves (Dean Nieves), provided an overview of the case and was available to answer questions.

Director of Specialized Investigations (Director Hodgman), participated in the Hearing as a Witness.

UCLA Undergraduate Student, [redacted] (Student Witness 1), participated in the Hearing as a Witness.

UCLA Undergraduate Student, [redacted] (Student Witness 2), participated in the Hearing as a Witness.

Assistant Adjunct Professor, [redacted] (Professor [redacted]), participated in the Hearing as a Witness.

UCLA Undergraduate Student, [redacted] (Student Witness 3), participated in the Hearing as a Witness.

Professor of Asian American Studies and Gender Studies, [redacted] (Professor [redacted]), participated in the Hearing as a Witness.

UCLA Graduate student, [redacted] (Student Witness 4), participated in the Hearing as a Witness.

UCLA Graduate Student, [redacted] (Student Witness 5), participated in the Hearing as a Witness.

UCLA Alumna, [redacted] ([redacted]), participated in the Hearing as a Witness.

UCLA Undergraduate Student, [redacted] (Student Witness 6), participated in the Hearing as a Witness.

UCLA Undergraduate Student, [redacted] (Student Witness 7), participated in the Hearing as a Witness.

UCLA Graduate Student, [redacted] (Student Witness 8), participated in the Hearing as a Witness.

Professor of Political Science, [redacted] (Professor [redacted]), participated in the Hearing as a Witness.

Assistant Professor of Asian American Studies, [redacted] (Professor [redacted]), participated in the Hearing as a Witness.

Design Media Arts Lecturer, [redacted] (Lecturer [redacted]), participated in the Hearing as a Witness.

The accused student, Dylan Kupsh (Kupsh), participated in the Hearing.

Amruta Trivedi participated in the Hearing as Kupsh's Advisor.

[redacted] participated in the Hearing as Kupsh's Support Person.

This report summarizes the findings of the Panel in regards to this case, and the information presented which the Panel found significant to their findings. This report does not represent a transcript of the Hearing proceedings.

Per Section III.K.9 of the *Code*, access to the full audio recording of the Hearing will be provided to any student considering submitting a response to the Hearing report.

III. Findings

The Panel found that there was Insufficient Information to demonstrate by a preponderance standard that Kupsh violated Section 102.16 (Failure to Comply) and 102.07 (Violations of University Policy) specifically, Section III. of *UCLA Interim Policy 860: Organized Events*: [with respect to an Event Organizer complying with the specific requirements and scheduling procedures of the Campus Venue Scheduler] of the *UCLA Student Conduct Code.*

The Panel found that there was Sufficient Information to demonstrate by a preponderance standard that Kupsh violated 102.07 (Violations of University Policy) specifically, Section IV.A. of the *UCLA Interim Policy 850: General Use of UCLA Property* [with respect to interfering with the free flow of campus traffic], Section IV. of the *UCLA Interim Policy 852: Public Expression Activities* [with respect to impeding foot traffic] of the *UCLA Student Conduct Code.*

IV. Information Presented

Benito Nieves (Associate Dean of Students and Dean Assigned to Case)

Dean Nieves provided an overview of the case. Dean Nieves explained that the Office of Student Conduct received a referral from a non-affiliate of UCLA.

Dean Nieves shared that Dean Nieves was assigned to Kupsh's case because Dean Murotake (the former assigned Dean) was no longer employed at UCLA.

Dean Nieves shared that it was reported that there was a blockage of pedestrian traffic on November 19, 2024.

Dean Nieves shared that it was reported that individuals organized a "blockade" and had engaged in the physical blocking of others. Dean Nieves noted that Kupsh was one of the individuals named in the report.

Dean Nieves shared that it was reported that Kupsh was listed as one of the "leaders" of Students for Justice in Palestine (SJP).

Dean Nieves shared that the report included an Instagram post linked to a video.

Dean Nieves shared that it was reported that the video was reported to have featured Kupsh allegedly blocking a UCLA student.

Dean Nieves shared that a still image of Kupsh at the alleged incident was included in the report.

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Dean Nieves shared UCPD provided an incident summary to the Office of Student Conduct on December 2, 2024, regarding the alleged incident that took place on November 19, 2024.

Dean Nieves shared that it was reported that members of SJP began to protest in Bruin Plaza for the "Nationwide Student Strike March Against Genocide" at approximately 1:00 P.M. on November 19, 2024.

Dean Nieves shared that it was reported that there was a "protest march" around campus, utilizing amplified sound, and returned to Bruin Plaza at approximately 1:30 P.M.

Dean Nieves shared that it was reported that the individuals marching proceeded to block east and westbound pedestrian traffic on Bruin Walk.

Dean Nieves shared that it was reported that UCPD representatives met with members of the group of individuals, including Kupsh.

Dean Nieves shared that a notice was sent to Kupsh from the Office of Student Conduct on April 28, 2025.

Dean Nieves noted that the notice that was sent from former Assistant Dean of Students, Dean Murotake on April 28, 2025, stated, "Specifically, it has been reported that on or around November 19th, 2024, near Bruin Walk, Ackerman Union, and the Student Activity Center, you participated in a human blockade that blocked all east and westbound pedestrian traffic on Bruin Walk."

Dean Nieves shared that former Assistant Dean of Students, Dean Murotake's notice letter included the section of the *UCLA Student Code of Conduct* that may have been violated was Section 102.07 (Violation of University Policy) [in reference to Time, Place, and Manner, with respect to blocking pedestrian access].

Dean Nieves shared that former Assistant Dean of Students, Dean Murotake, met with Kupsh on March 5, 2025, to discuss the allegations. Dean Nieves shared that Kupsh shared the following with Dean Murotake:

> Kupsh shared grievances against individuals on campus.
>
> Kupsh shared that the Office of Student Conduct was violating employment rights.

Dean Nieves shared that the meeting notes from Kupsh's meeting with former Assistant Dean of Students, Dean Murotake, do not contain comments from Kupsh regarding the specific allegations.

Dean Nieves shared that former Assistant Dean of Students, Dean Murotake stated in the March 5, 2025, meeting, "We should shift to talking about the November allegations."

Dean Nieves shared that former Assistant Dean of Students, Dean Murotake stated that in an email, that Kupsh did not accept or deny responsibility for the allegations.

Dean Nieves shared that Dean Nieves informed Kupsh that Dean Nieves would be the new assigned Dean for Kupsh's case on March 24, 2026.

Dean Nieves shared that Dean Nieves reached out to Director of Specialized Investigations, William Hodgman (Director Hodgman), who serves as a liaison between the Office of Student Conduct and UCPD. Dean Nieves shared that Dean Nieves contacted Director Hodgman because there of the absence of an incident summary from Director Hodgman in Dean Murotake's draft of Kupsh's Hearing packet.

Dean Nieves shared that Director Hodgman's incident summary was shared with Kupsh on March 26, 2026.

Dean Nieves shared that it was reported that Student Affairs Mitigator, Chett Miller (Miller), interacted with Kupsh during the alleged incident.

Dean Nieves shared that it was reported that Kupsh "unfurls" a banner during the alleged incident.

Dean Nieves shared that it was reported that Kupsh was wearing a black and white "keffiyeh" during the alleged incident.

Dean Nieves shared that it was reported that Kupsh asked UCPD officers if it is a "policy" to "stick a phone in someone's face."

Dean Nieves shared that Dean Nieves shared Director Hodgman's incident summary with Kupsh. Dean Nieves shared that Dean Nieves informed Kupsh that Dean Nieves was desirous to meet with Kupsh regarding Director Hodgman's incident summary. Dean Nieves shared that Kupsh did not respond to Dean Nieves outreach.

Dean Nieves shared that Dean Nieves met with Miller on March 31, 2026, to discuss the allegations. Miller shared the following with Dean Nieves:

> Miller referred to Kupsh as an "organizer" of the event.
>
> Miller shared that Kupsh was "idling" during Miller's interaction with Kupsh during the alleged incident.
>
> Miller shared that Miller informed Kupsh that Kupsh was "blocking others from getting by."
>
> Miller stated, "There appeared to be no apparent reason [Kupsh] was idling in the same spot on Bruin Walk other than [Kupsh] appeared to be gathered with the group."

Miller shared that Miller informed Kupsh that the individuals gathered at Bruin Walk would need to relocate. Miller shared that Kupsh did not relocate.

Miller shared that Miller observed Kupsh "block at least one person."

Miller shared that an individual "attempted to get through bushes to get by the formed lines of individuals interlocked in arms." Miller shared that Kupsh "moved in such a way to obstruct" the individual. Miller shared that Miller observed that Kupsh "mirrored" the individual's movements when the individual attempted to get past Kupsh.

Miller recalled that Kupsh "held out a sign" in front of the individual's face while "maneuvering side to side" in front of the individual, "preventing [the individual] from getting through."

Dean Nieves shared that Dean Nieves shared the meeting notes between Dean Nieves and Miller with Kupsh. Dean Nieves shared that Dean Nieves informed Kupsh that Dean Nieves wanted to meet with Kupsh regarding the information that Miller provided. Dean Nieves shared that Kupsh did not respond to Dean Nieves' outreach to meet.

Dean Nieves shared that Director Hodgman shared additional information regarding the alleged incident, on April 6, 2026. Director Hodgman's information contained the following:

Director Hodgman shared that Kupsh was observed through various camera footage near the "protests, blockade, the march, and the other grouped individuals" between 12:30 P.M. and 2:58 P.M. on the date of the incident.

Dean Nieves shared that Dean Nieves shared Director Hodgman's additional information with Kupsh.

Dean Nieves shared that Dean Nieves sent an updated notice letter with new allegations to Kupsh, based on the information provided from Director Hodgman and Miller. Dean Nieves shared that Dean Nieves reviewed why the specific policies that were named in the notice letter to Kupsh were relevant to Kupsh's case.

Dean Nieves shared that Dean Nieves received a video pertaining to November 19, 2024, from UCPD Captain, Scott Scheffler, on April 17, 2026. Dean Nieves shared that Dean Nieves informed Kupsh about Dean Nieves' receipt of the video. Dean Nieves informed Kupsh that Dean Nieves was unable to share the video electronically. Dean Nieves met with Kupsh on April 20, 2026, to review the video. Kupsh shared that Kupsh was not desirous to discuss the video or receive questions from Dean Nieves.

Dean Nieves shared a video from a non-affiliate pertaining to the alleged incident. Dean Nieves shared the following regarding the non-affiliate video:

Dean Nieves shared that there were a collection of individuals that appeared to be grouped in a line along Bruin Walk.

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Dean Nieves noted an individual wearing a mask, black and white cloth, yellow vest, with a dark, long-sleeve shirt. Dean Nieves shared that Dean Nieves would be referring to said individual as "[Kupsh]" because the individual in the non-affiliate video is the individual that was in a still image that was provided in the complaint that states that this individual is "[Kupsh]."

Dean Nieves shared that Kupsh was identified wearing the same attire in the summary provided by Director Hodgman.

Dean Nieves shared that an individual in the video was attempting to get through a line of individuals, one of which included Kupsh. Dean Nieves shared that Kupsh's back was initially oriented towards the individual attempting to get through the line of individuals. Dean Nieves shared that Kupsh turned around and verbally engaged with the individual. Dean Nieves shared that the individual states that the individual wished to get through a particular passage of the line of individuals. Dean Nieves shared that Kupsh did not move when the individual stated the individual's wish to pass through the line.

Dean Nieves shared a video from UCPD Captain, Scott Scheffler pertaining to the alleged incident. Dean Nieves shared the following regarding video:

Dean Nieves shared that Dean Nieves observed individuals with interlocked arms along Bruin Walk.

Dean Nieves shared that Dean Nieves did not observe Kupsh interlocking arms. Dean Nieves noted that Kupsh was "mostly behind" the individuals with interlocked arms.

Dean Nieves shared that Kupsh walked away from a sign that was "mostly in [Kupsh's] possession throughout the video."

Dean Nieves shared that Dean Nieves observed Kupsh appear on screen at one minute and twenty seconds of the video.

Dean Nieves stated:

> "I see the corner of what I will later describe as a sign affixed to a metal structure or barricade. I give it that description because it is a freestanding sign that appears to have a platform at times, when let go of does not fall to the ground. So, it has a metal rectangular structure. It is about 3 feet tall and about 6 feet in length, from my observation."

Dean Nieves shared that Kupsh appeared to be in a verbal conversation with a woman at two minutes and twenty-three seconds of the video. Dean Nieves shared that Kupsh pointed "in a specific direction." Dean Nieves shared that the woman that was speaking with Kupsh walked away after ten seconds of interaction with Kupsh. Dean Nieves

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shared that the woman stated, "Fucking ridiculous" when the woman walked away from Kupsh.

Dean Nieves shared that Kupsh had both of Kupsh's hands on the metal rod portion of the frame of the sign at four minutes and ten seconds of the video. Dean Nieves shared that Dean Nieves observed an individual with a camera walk to the right-hand side of the screen. Dean Nieves stated, "At this time. [Kupsh] appears to notice the individual walking to the right side, and then positions the sign further to the right."

Dean Nieves stated, "[Kupsh] then pauses and appears to be looking at [the individual with the camera] there, watching his movements."

Dean Nieves stated, "I point this out because as the reviewer, it is my position that [Kupsh's] moving of the sign is in response to this individual appearing to try to walk down this pathway, and stops the movement of the sign when this individual stops."

Dean Nieves shared that Dean Nieves observed Kupsh position the sign in a manner that blocked two women's access to a walkway at four minutes and thirty-five seconds of the video.

In response to questions from the Panel, Dean Nieves shared the following:

Dean Nieves shared that the page numbers in the Hearing packet were created by former Assistant Dean of Students, Dean Murotake. Dean Nieves shared that Dean Nieves did not receive information from Kupsh regarding an "error" regarding page thirteen of the Hearing packet. Dean Nieves screen shared page thirteen of the PDF in the Hearing packet.

Dean Nieves shared that Dean Nieves was unaware of Kupsh's "purpose for idling" or "for not moving when someone was asking to be able to get by." Dean Nieves commented that Kupsh's alleged "blockage" was deemed unlawful.

In response to questions from Kupsh, Dean Nieves shared the following:

Dean Nieves shared that Dean Nieves did not review information that Kupsh submitted to the Panel for the Panel's consideration. Dean Nieves noted that the *UCLA Student Conduct Code* does not contain a procedure detailing that information submitted by a student for the Panel's consideration would be submitted to the assigned Dean.

Dean Nieves shared that Dean Nieves cited the specific policy language in the *Code* sections to the Panel, regarding the policies that Dean Nieves reviewed for Kupsh's case. Dean Nieves screen shared an email that Dean Nieves sent to Kupsh that contained the specific policy language in the *Code* sections that Dean Nieves reviewed for Kupsh's case.

Dean Nieves shared that Dean Nieves was not the assigned Dean to Kupsh's case in January of 2026.

Dean Nieves shared that Kupsh's case is an Individual Student Conduct case.

Dean Nieves shared that Dean Nieves observed that Kupsh appeared to have engaged in conversation with the non-affiliate complainant during the video submitted by the non-affiliate complainant. Dean Nieves shared that Dean Nieves observed that Kupsh did not move when the non-affiliate complainant stated a desire to pass Kupsh and other individuals.

Dean Nieves shared that Dean Nieves observed Kupsh "appear to maneuver himself in front of [individuals] using the sign to block their pathway and their walkway" in the video submitted by UCPD Captain, Scott Scheffler.

Dean Nieves shared that Dean Nieves updated Kupsh's notice letter once.

Dean Nieves shared that Kupsh's updated notice letter that was sent to Kupsh on April 6, 2026, can be found on page 31 of the Hearing packet. Dean Nieves shared that the original notice letter that was sent to Kupsh on April 28, 2025, can be found on page 28 of the Hearing packet.

Dean Nieves shared that Dean Murotake's updated notice letter that former Assistant Dean of Students, Dean Murotake, sent to Kupsh was sent after Dean Murotake's initial meeting with Kupsh in March of 2025.

Dean Nieves shared that Dean Nieves' updated notice letter that Dean Nieves sent to Kupsh on April 6, 2026, contained additional student conduct charges based on the information that Miller and Director Hodgman provided to Dean Nieves.

Dean Nieves shared that Dean Nieves did not seek permission to add new student conduct charges from the Vice Chancellor of Student Affairs. Dean Nieves clarified that Dean Nieves is not required to seek permission from the Vice Chancellor of Student Affairs to add new student conduct charges to an updated notice letter.

Dean Nieves shared that all interview notes between Kupsh and Dean Nieves can be found in the Hearing packet or included separately via email correspondence to Kupsh. Dean Nieves shared that any such interview notes would be provided to the Panel prior to the Hearing.

Dean Nieves shared that Dean Nieves would not have been present with Kupsh and former Assistant Dean of Students, Dean Murotake, during a meeting that took place in June of 2025.

Dean Nieves shared that there is an allegation regarding Kupsh interfering with access to classrooms, laboratories, parking structures, offices, or buildings.

Dean Nieves shared that "instructional, research, administrative, or other event activities" are not detailed in the relevant language contained in *UCLA Interim Policy 850* that Kupsh was being charged with allegedly violating.

Dean Nieves shared that Director Hodgman's summary of the allegations noted that a UCPD officer stated to Kupsh that the UCPD officer could not "get by [Kupsh]."

Dean Nieves shared that Nicole Lakey (Lakey), the reporting party, is a non-affiliate with UCLA. Dean Nieves stated, "[Lakey] does not need to have been directly impacted in order for the Office for Student Conduct to be able to review the matter."

Dean Nieves shared that Director Hodgman's summary of the allegations stated, "Kupsh claimed not to be an event organizer, but stated [Kupsh] could relay messages." Dean Nieves recalled Director Hodgman describing Kupsh as "an apparent organizer."

Dean Nieves shared that Dean Nieves has not measured the distance between the Student Activity Center and Ackerman Union.

Dean Nieves shared that Dean Nieves did not recall Director Hodgman's report detailing that Kupsh walked through the "line of protestors." Dean Nieves stated, "The only time I see that [Kupsh] is in line specifically with the protesters is on [Lakey's] video."

Dean Nieves shared that Kupsh stated in the UCPD incident report and Director Hodgman's summaries that Kupsh was not an organizer of the event that took place during the alleged incident.

Dean Nieves shared that there was no information that Dean Nieves reviewed where Kupsh self-identified as the organizer of the event that took place during the alleged incident.

Dean Nieves shared that Miller stated that the event that took place on or around Bruin Walk was not an approved campus event.

Dean Nieves shared that Director Hodgman's report stated that Miller informed Kupsh that the "human blockade" was "unlawful."

Dean Nieves shared that Director Hodgman's report stated that a Student Affairs Mitigator was "physically blocked by protestors and had to climb through adjacent bushes to leave the area."

Dean Nieves shared that Dean Nieves did not observe a student "bump" into Kupsh in the non-affiliate's video.

William Hodgman (Director of Specialized Investigations and Witness)

Director Hodgman shared that Director Hodgman submitted two supplemental reports regarding the alleged incident to the Office of Student Conduct. Director Hodgman shared that the first supplemental report was submitted on December 19, 2025. Director Hodgman shared that the second supplemental report was submitted on April 6, 2026.

Director Hodgman shared that Director Hodgman's supplemental reports contained the following information about the alleged incident that took place on November 19, 2024:

> Director Hodgman shared that at 1:18 P.M. Kupsh was observed "at the foot of the walkway at Bruin Walk." Director Hodgman shared that Kupsh "unfurled a sign" that "appeared to be made out of fabric, and [Kupsh] took one end of it and stretched it across Bruin Walk."
>
> Director Hodgman shared that Kupsh "held onto the end of [the sign]."
>
> Director Hodgman shared that the sign was approximately nine to ten feet long.
>
> Director Hodgman stated, "[Kupsh] held onto the sign for probably less than a minute before he handed it off to another individual wearing a sweatshirt."
>
> Director Hodgman shared that twelve to fourteen individuals "interlocked arms" which "obstructed the passage of individuals who were trying to go from west to east of Bruin Walk, or from east to west down Bruin Walk" at 1:30 P.M.
>
> Director Hodgman shared that a female individual spoke to a Public Safety Aid (PSA) at 1:31 P.M. stating that the female individual could not get to her car due to the activity during the alleged incident.
>
> Director Hodgman stated, "At this point in time, [Kupsh] moves to directly behind the barricade of people with interlocked arms. [Kupsh] is carrying a green sign."
>
> Director Hodgman shared that the sign "appeared" to be made of "PVC or some sort of lightweight aluminum-type thing." Director Hodgman noted that the dimensions of the sign "appeared to be about six feet wide by maybe two and a half feet tall."
>
> Director Hodgman shared that the same female individual that spoke with the PSA engaged with Kupsh. Director Hodgman stated, "[Kupsh] is seen gesturing with his right hand and pointing across his body towards the north, that is, to the area where bushes were immediately adjacent to Bruin Walk." Director Hodgman further stated, "The woman appeared to engage in a little bit more conversation, then in an apparent frustration, she turned and walked away uphill."
>
> Director Hodgman shared that SAMs spoke with the PSA during the alleged incident. Director Hodgman shared that the PSA told the SAMs that there are students "who can't get to their car."

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Director Hodgman shared that Miller was heard telling Kupsh, "Our students can't get by you."

Director Hodgman shared that the SAMs "had to leave by climbing through the bushes to the north."

Director Hodgman shared that two individuals approached Kupsh after the SAMs left the alleged incident.

Director Hodgman stated, "As these two individuals approached, [Kupsh] moved, kind of sidestepped, to [Kupsh's] left, as if moving the green sign in front of them. The two individuals appeared to speak with [Kupsh], and then they too turned away."

Director Hodgman shared that Kupsh was observed engaging with UCPD officers during the alleged incident.

Director Hodgman shared that Kupsh communicated to UCPD officers that Kupsh was not an organizer of the event. Director Hodgman shared that Kupsh communicated to UCPD officers that Kupsh could deliver messages to the individuals that were participating in the event.

Director Hodgman stated, "There was no sign that [Kupsh] spoke with anyone, or that there was any change in the behavior of the people who were blocking the line."

In response to questions from the Panel, Director Hodgman shared the following:

Director Hodgman shared that Kupsh did not leave the alleged incident after UCPD officers informed Kupsh that the event was unlawful.

In response to questions from Kupsh, Director Hodgman shared the following:

Director Hodgman shared that Kupsh was not arrested during the alleged incident.

Director Hodgman shared Kupsh was not charged with any crime related to unlawful activity on November 19, 2024.

Director Hodgman shared that Director Hodgman was not physically present during the alleged incident.

Director Hodgman shared that Director Hodgman "was prompted by a representative from the Office of Student Conduct" to submit Director Hodgman's supplemental report in December of 2025. Director Hodgman shared that Director Hodgman submitted the second supplemental report after receiving notice of Kupsh's Hearing.

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Director Hodgman shared that Director Hodgman reviewed body-worn camera footage from UCPD officers, and campus security footage when generating Director Hodgman's supplemental reports.

Director Hodgman shared that Director Hodgman's reports do not state that Kupsh "interlinked arms" during the alleged incident.

Director Hodgman shared that Director Hodgman's report states that Kupsh communicated to UCPD officers that Kupsh was not an organizer of the event.

Director Hodgman shared that Director Hodgman's report did not state that Kupsh claimed the ability to "stop the blockade."

Director Hodgman shared that Director Hodgman observed Kupsh holding a sign in front of the female individual that approached Kupsh. Director Hodgman stated, "And it appeared as though [Kupsh] was blocking her. She had some interaction with [Kupsh], and then turned away, and started to go back uphill. She appeared to be very frustrated and was heard on audio…saying the F word."

Director Hodgman shared that Director Hodgman was unable to specify if the SAMs exited the alleged incident due to Kupsh "blocking" or whether it was because of other individuals "blocking."

Director Hodgman shared that Kupsh "appeared to be an event organizer." Director Hodgman noted that Kupsh was wearing a green vest, and was present for the duration of the event. Director Hodgman shared that Kupsh spoke with other individuals wearing green vests.

Director Hodgman shared that Kupsh was observed "frequently stopping and apparently conversing with other individuals who were wearing the yellow and green safety vests" after Kupsh stated to UCPD officers that Kupsh could relay messages to other individuals.

Director Hodgman shared that the "group event" was unlawful.

Student Witness 1 (UCLA Undergraduate Student and Presentation from Witness)

Student Witness 1 shared that Student Witness 1 was present at Bruin Walk during the "protest" on November 19, 2024.

Student Witness 1 shared that Student Witness 1 "had involvement in the prep" for the "protest" that took place on November 19, 2024. Student Witness 1 shared that Kupsh was not an organizer of the "protest."

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Student Witness 1 shared that Kupsh was "liaisoning with UCPD and Student Affairs" during the alleged incident.

Student Witness 1 stated, "As I walked down Bruin Walk, I saw two lines formed with people linking their elbows together, while another group was walking in a circle in… Bruin Plaza."

Student Witness 1 shared that Student Witness 1 was not allowed to pass through by individuals with interlocked arms.

Student Witness 1 shared that Student Witness 1 saw Kupsh near the stairs to Ackerman Union during the alleged incident.

Student Witness 1 shared that Student Witness 1 observed Kupsh speaking with SAMs during the alleged incident.

Student Witness 1 stated, "[Kupsh] never joined the line of protesters, nor did he block any students." Student Witness 1 noted that Kupsh never linked arms with any individuals during the alleged incident.

Student Witness 1 shared that Kupsh spoke to individuals that were participating in the "protest" after SAMs and UCPD directed Kupsh to do so.

Student Witness 1 shared that Kupsh did not make decisions for the group of individuals that were protesting.

Student Witness 1 stated, "[Kupsh] would go and talk to students who were confused on whether they would be able to pass through the students standing in the two lines at the entrance of Bruin Walk."

Student Witness 1 stated:

> "[Kupsh] would commonly explain to both the counter-protesters and the confused students that they could walk past the students, and there were paths made for them to be able to walk up Bruin Walk. These paths were either… faster ways to their destination, so [Kupsh] would ask where they were trying to go, so he could help show the path."

Student Witness 1 shared that "a lot of people" used the path "on the side of Bruin Walk" to get past the individuals that were gathered on Bruin Walk.

Student Witness 1 stated, "Some people also started naturally just walking through the bushes at some point, so they wouldn't have to stop and talk to anyone."

Student Witness 1 shared that Student Witness 1 did not hear Kupsh direct individuals to walk through bushes near Bruin Walk.

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Student Witness 1 shared that Student Witness 1 did not observe Kupsh preventing the free movement of any individual during the alleged incident.

Student Witness 1 shared that Student Witness 1 did not observe Kupsh holding a sign that made it "difficult" to walk past.

Student Witness 1 shared that Student Witness 1 observed Kupsh attempt to "de-escalate" with counter-protestors.

Student Witness 1 stated, "A lot of people would turn around when they saw the lines [of individuals protesting]."

Student Witness 1 shared that Kupsh explained to individuals "how they could get to their destination."

In response to questions from the Panel, Student Witness 1 shared the following:

> Student Witness 1 shared that Student Witness 1 was not observing Kupsh for the entire duration that Student Witness 1 was present during the alleged incident.

In response to questions from Kupsh, Student Witness 1 shared the following:

> Student Witness 1 shared that Student Witness 1 did not observe Kupsh "blocking" individuals by "mirroring" their movements.
>
> Student Witness 1 shared that Student Witness 1 would not have followed directions from Kupsh if Kupsh ordered Student Witness 1 to do an action.
>
> Student Witness 1 stated, "Yes, I did witness [Kupsh] communicating messages to other protesters."
>
> Student Witness 1 shared that Student Witness 1 did not observe Kupsh refusing to comply with the direction of a University official.

Student Witness 2 (UCLA Undergraduate Student and Presentation from Witness)

Student Witness 2 shared that Student Witness 2 was present at Bruin Walk during the alleged incident on November 19, 2024.

Student Witness 2 shared that Student Witness 2 spoke with Kupsh near Powell Library on November 19, 2024.

Student Witness 2 stated, "I saw [Kupsh] running back and forth between those protesting and police and admin." Student Witness 2 further stated, "I saw [Kupsh] talking with police and administration and acting as a go-between, relaying information between police and admin and those protesting."

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Student Witness 2 stated, "At no point did I see [Kupsh] block access to Bruin Walk, link arms with other protesters, form a human blockade, or any other form of blocking access to campus for students or any other people."

Student Witness 2 shared that Student Witness 2 understood that holding a sign or wearing a vest did not indicate "a position of leadership."

Student Witness 2 stated, "I would not have listened to [Kupsh's] directions, should he have directed me to do anything."

Student Witness 2 stated, "I did witness [Kupsh] interacting with the police and admin as they relayed directions to him."

In response to questions from Kupsh, Student Witness 2 shared the following:

> Student Witness 2 shared that Student Witness 2 did not observe Kupsh "blocking" individuals by "mirroring" their movements.
>
> Student Witness 2 shared that Student Witness 2 did not consider Kupsh to be an event organizer.
>
> Student Witness 2 stated, "I would not have followed [Kupsh's] directions."
>
> Student Witness 2 stated, "[Kupsh] complied with all of the directions that he was able to comply with."

[redacted] (Assistant Adjunct Professor and Presentation from Witness)

Professor [redacted] shared that Professor [redacted] was present at Bruin Walk for the duration of the "protest" on November 19, 2024.

Professor [redacted] stated:

> "I observed [Kupsh] at the protest acting in a role of liaison with the police, speaking with police officers, and communicating their messages to other protesters. I did not observe [Kupsh] blocking access to any individual or telling anyone what to do. To the best of my knowledge, [Kupsh] was not a lead organizer of the protest."

In response to questions from Kupsh, Professor [redacted] shared the following:

> Professor [redacted] shared that Professor [redacted] did not observe Kupsh "interlinking arms" with individuals during the alleged incident.
>
> Professor [redacted] shared that Professor [redacted] did not consider Kupsh to be an organizer during the alleged incident.

Professor [redacted] shared that Professor [redacted] would not have followed Kupsh's directions if Kupsh ordered [redacted] to do an action.

Professor [redacted] shared that Kupsh did not "disobey" directions from University officials.

Professor [redacted] shared that Professor [redacted] did not observe Kupsh "participate in creating a human blockade."

Student Witness 3 (UCLA Undergraduate Student and Presentation from Witness)

Student Witness 3 shared that Student Witness 3 was present at Bruin Walk during the alleged incident on November 19, 2024.

Student Witness 3 shared that Student Witness 3 observed Kupsh standing near "private security officers" during the "protest."

Student Witness 3 stated, "At no point during the demonstration did I observe [Kupsh] blocking access, preventing students from walking, or taking any part of leadership in the planning of the event."

Student Witness 3 shared that Student Witness 3 was standing near Kupsh for "most of the protest."

Student Witness 3 stated, "[Kupsh] was never one of the individuals who linked elbows."

Student Witness 3 stated, "[Kupsh] would convey messages regarding safety. If there was a note from Student Affairs to the students, [Kupsh] would share on behalf of both parties."

Student Witness 3 shared that Kupsh did not tell individuals that they "could not pass."

In response to questions from Kupsh, Student Witness 3 shared the following:

Student Witness 3 shared that Student Witness 3 did not observe Kupsh "interlinking arms" with individuals during the alleged incident. Student Witness 3 stated, "There were people that could go at least a wide distance around him."

Student Witness 3 stated, "I've never heard him represent himself as a leader or an organizer of these protests."

Student Witness 3 shared that Kupsh did not control Student Witness 3's actions during the alleged incident.

Student Witness 3 shared that Kupsh did not refuse to comply with directions from University officials during the alleged incident.

[redacted] (Professor of Asian American Studies and Gender Studies and Presentation from Witness)

Professor [redacted] shared that Professor [redacted] was present at Bruin Plaza on November 19, 2024, from "around" 1:00 P.M. to 3:30 P.M.

Professor [redacted] stated, "I saw [Kupsh] there, acting as a liaison between the demonstrators and the police and Student Affairs officers. [Kupsh's] role as liaison is simply to convey information back and forth between students and police or Student Affairs staff."

Professor [redacted] stated, "I was near [Kupsh] at all times."

Professor [redacted] stated, "At no point did [Kupsh] block anyone's way, obstruct or impede any University official from doing their jobs, use amplified sound, or do anything that was a violation of the Student Conduct Code."

Professor [redacted] shared that Professor [redacted] observed Kupsh speaking with UCPD officers and Student Affairs staff near Ackerman Union.

Professor [redacted] stated, "I heard Sergeant Stanberry tell [Kupsh] and the other student that holding the demonstration in Bruin Plaza was fine and did not violate policies, but that they had to let foot traffic come through."

Professor [redacted] shared that the "demonstrators" "left space so pedestrians could walk past."

Professor [redacted] stated, "Pedestrians wanting to cruise across Bruin Walk could have walked around this group of students to the left, and many did. They could also have turned right and entered Ackerman Union and walked through the building."

Professor [redacted] stated, "Many pedestrians approached, saw the line, decided for themselves that they wanted to support the demonstrators, by not crossing the line and went in a different direction."

Professor [redacted] shared that Kupsh did not "link" arms with other individuals during the alleged incident.

Professor [redacted] shared that Professor [redacted] did not hear a dispersal order from UCPD officers.

In response to questions from Kupsh, Professor [redacted] shared the following:

> Professor [redacted] shared that Professor [redacted] did not observe Kupsh "mirror" individuals' movements to prevent them from walking through Bruin Walk.
>
> Professor [redacted] shared that Professor [redacted] did not observe Kupsh represent himself as an event organizer.

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Professor [redacted] shared that Kupsh did not "control" Professor [redacted]'s actions during the alleged incident. Professor [redacted] noted that Kupsh did not order individuals "to do anything."

Professor [redacted] shared that Professor [redacted] did not observe Kupsh communicate with "counter-protestors." Professor [redacted] shared that Professor [redacted] did not observe Kupsh refuse "any orders."

Professor [redacted] shared that Professor [redacted] did not observe Kupsh participate in creating a "human blockade." Professor [redacted] shared that Professor [redacted] did not observe Kupsh "block" an individual from moving through bushes.

Student Witness 4 (UCLA Law Student and Presentation from Witness)

Student Witness 4 shared that Student Witness 4 was present at "The March Against Genocide" on November 19, 2024.

Student Witness 4 stated, "Throughout the day, I never saw [Kupsh] fail to comply with University policy. The only action I witnessed [Kupsh] be a part of was acting as a liaison between student protesters and University officials and police."

Student Witness 4 shared that Kupsh was not a "leader, nor organizer, nor protestor."

Student Witness 4 shared that Student Witness 4 did not observe Kupsh "block" individuals throughout the duration of the alleged incident.

Student Witness 4 shared that Student Witness 4 did not observe Kupsh "link arms with anyone."

Student Witness 4 stated, "[Kupsh] was actively speaking to officers, administrators, going back and forth, relaying messages, or attempting to relay messages."

Student Witness 4 stated, "[Kupsh] never instructed me to do anything. I never heard [Kupsh] instruct anyone else to do something."

Student Witness 4 shared that Kupsh would not have been able to "remove the blockade" because Kupsh "was not a leader or an organizer of the event."

In response to questions from Kupsh, Student Witness 4 shared the following:

Student Witness 4 shared that Student Witness 4 did not observe Kupsh "block" or "mirror" anyone on Bruin Walk.

Student Witness 4 shared that Kupsh did not control Student Witness 4's actions during the alleged incident.

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Student Witness 4 shared that Student Witness 4 did not observe Kupsh fail to comply with orders from a University official.

Student Witness 4 shared that Student Witness 4 did not observe Kupsh "participate in creating a human blockade, interfere with the free flow of campus traffic, or block an individual from moving through bushes."

Student Witness 5 (UCLA Graduate Student and Presentation from Witness)

Student Witness 5 shared that Student Witness 5 was present at Bruin Walk on November 19, 2024.

Student Witness 5 shared that Student Witness 5 observed Kupsh at Bruin Walk from the "start" of the event.

Student Witness 5 stated, "[Kupsh's] role was primarily as a liaison between student protesters and school administrators and police."

Student Witness 5 stated, "I never saw [Kupsh] obstruct or impede any university officials from doing their jobs, utilize amplifying sound, or do anything that violated the university Student Code of Conduct."

Student Witness 5 shared that Student Witness 5 did not observe Kupsh "join the protestors."

Student Witness 5 stated, "I can still see [Kupsh] making room for non-protesters and students to enter through Bruin Walk from the sides of the bike path."

Student Witness 5 stated that the "blocking" was due to "counter-protestors" and UCPD officers.

In response to questions from Kupsh, Student Witness 5 shared the following:

Student Witness 5 shared that Kupsh did not "interlink arms" with individuals during the alleged incident.

Student Witness 5 shared that Kupsh did not "mirror" any individuals' movements during the alleged incident.

Student Witness 5 shared that Student Witness 5 did not consider Kupsh to be an event organizer. Student Witness 5 shared that Kupsh did not represent himself as an event organizer during the alleged incident.

Student Witness 5 shared that Kupsh was not in control of Student Witness 5's actions during the alleged incident.

Student Witness 5 shared that Kupsh did not refuse to comply with the orders of any University official during the alleged incident.

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Student Witness 5 shared that Student Witness 5 did not observe Kupsh participating in a "human blockade, interfere with the free flow of campus traffic, [or] block an individual from moving through bushes."

[redacted] (UCLA Alumna and Presentation from Witness)

[redacted] shared that [redacted] was an organizer for the "March Against Genocide" on November 19, 2024.

[redacted] stated, "[Kupsh] was standing by me… as… the police liaison."

[redacted] stated, "I never once witnessed [Kupsh] participating in the human blockade. I never once witnessed [Kupsh] refusing to abide by the University policies. [Kupsh] was solely there to act as a police liaison."

[redacted] shared that [redacted] asked Kupsh to be a "police liaison" on November 19, 2024.

[redacted] stated, "I do want to make clear that, those who were wearing vests were not all organizers."

[redacted] shared that [redacted] did not observe Kupsh fail to comply with University officials.

[redacted] shared that Kupsh approached individuals participating in the "blockade" and mentioned that the individuals "probably shouldn't [participate in the 'blockade']." [redacted] shared that [redacted] "didn't care."

[redacted] shared that [redacted] observed Kupsh relay messages to the event organizers during the alleged incident.

[redacted] stated, "There were still ways for students to get around through Ackerman."

[redacted] stated, "[Kupsh] tried his best with what [Kupsh] could do, given that we weren't willing to work with him outside of him conveying messages in between, to help students get across."

[redacted] shared that Kupsh did not "direct orders" to individuals on Bruin Walk.

In response to questions from Kupsh, [redacted] shared the following:

[redacted] shared that [redacted] did not observe Kupsh "interlinking arms" with individuals on Bruin Walk during the alleged incident.

[redacted] shared that [redacted] did not observe Kupsh "mirror" individuals' movements on Bruin Walk during the alleged incident.

[redacted] shared that Kupsh did not control [redacted]'s actions during the alleged incident.

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[redacted] shared that [redacted] did not observe Kupsh interfere with the free flow of campus traffic during the alleged incident.

Student Witness 6 (UCLA Undergraduate Student and Presentation from Witness)

Student Witness 6 shared that Student Witness 6 observed Kupsh near Bruin Walk on November 19, 2024.

Student Witness 6 shared that Student Witness 6 observed Kupsh speaking to UCPD officers during the alleged incident. Student Witness 6 stated, "After their conversation ended, I watched [Kupsh] go one by one down the line of protesters, informing them individually of the police's message."

Student Witness 6 shared that Student Witness 6 did not observe Kupsh violating the *UCLA Student Conduct Code* during the alleged incident.

Student Witness 6 shared that Student Witness 6 did not observe Kupsh participating in the "human blockade."

In response to questions from Kupsh, Student Witness 6 shared the following:

> Student Witness 6 shared that Student Witness 6 did not observe Kupsh "interlinking arms" with individuals during the alleged incident.
>
> Student Witness 6 shared that Student Witness 6 did not observe Kupsh "mirror" individuals' movements on Bruin Walk during the alleged incident.
>
> Student Witness 6 shared that Kupsh did not represent himself as an organizer during the alleged incident.
>
> Student Witness 6 shared that Kupsh did not control Student Witness 6's actions during the alleged incident.
>
> Student Witness 6 shared that Student Witness 6 did not observe Kupsh refusing to comply with the orders of a University official during the alleged incident.
>
> Student Witness 6 shared that Student Witness 6 did not observe Kupsh interfere with the free flow of campus traffic during the alleged incident.

Student Witness 7 (UCLA Undergraduate Student and Presentation from Witness)

Student Witness 7 shared that Student Witness 7 was present on Bruin Walk on November 19, 2024.

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Student Witness 7 shared that Student Witness 7 did not observe Kupsh giving directions to individuals on Bruin Walk during the alleged incident. Student Witness 7 stated, "At no point during this march was [Kupsh] leading the group, or giving instructions to the group."

Student Witness 7 stated, "The only time I saw [Kupsh] take an active role in this process was… helping explain why people in the line needed to let through someone that… had a mobility or access need."

Student Witness 7 stated, "I don't believe that [Kupsh] was a primary disruption to University operations or the wellness of students."

In response to questions from Kupsh, Student Witness 7 shared the following:

> Student Witness 7 shared that Student Witness 7 did not observe Kupsh "interlinking arms" with individuals during the alleged incident.
>
> Student Witness 7 shared that Student Witness 7 did not observe Kupsh "mirror" individuals' movements during the alleged incident.
>
> Student Witness 7 shared that Student Witness 7 did not consider Kupsh to be an organizer.
>
> Student Witness 7 shared that Kupsh did not control Student Witness 7's actions during the alleged incident.
>
> Student Witness 7 shared that Student Witness 7 did not observe Kupsh refuse to comply with the orders of University officials during the alleged incident.
>
> Student Witness 7 shared that Student Witness 7 did not observe Kupsh "participate in a human blockade, interfere with the free flow of campus traffic, [or] block an individual from moving through bushes."

Student Witness 8 (UCLA Graduate Student and Presentation from Witness)

Student Witness 8 shared that Student Witness 8 was present at the alleged incident for "about 30 minutes" at Bruin Walk.

Student Witness 8 shared that Student Witness 8 spoke with Kupsh near Bruin Walk during the alleged incident.

Student Witness 8 stated, "It was clear to me at that time that [Kupsh] was not running the protest."

Student Witness 8 stated, "[Kupsh] had a sign, I believe, but he wasn't blocking anybody."

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Student Witness 8 shared that Kupsh did not direct individuals to "interlink" arms during the alleged incident.

Student Witness 8 shared that Student Witness 8 observed Kupsh being "called over by the Student Affairs people."

Student Witness 8 shared that Student Witness 8 observed Kupsh "trying to de-escalate the situation."

In response to questions from Kupsh, Student Witness 8 shared the following:

> Student Witness 8 shared that Student Witness 8 did not observe Kupsh "interlinking arms" with individuals during the alleged incident.
>
> Student Witness 8 shared that Student Witness 8 did not observe Kupsh "mirror" individuals' movements during the alleged incident.
>
> Student Witness 8 shared that Student Witness 8 did not observe Kupsh represent himself as an organizer during the alleged incident.
>
> Student Witness 8 shared that Student Witness 8's actions were not controlled by Kupsh during the alleged incident.
>
> Student Witness 8 shared that Student Witness 8 observed Kupsh speaking with individuals protesting. Student Witness 8 shared that Student Witness 8 did not observe Kupsh refuse to comply with orders from University officials.
>
> Student Witness 8 shared that Student Witness 8 did not observe Kupsh "participate in a human blockade, interfere with the free flow of campus traffic, [or] block an individual from moving through bushes."

[redacted] (Professor of Political Science and Presentation from Witness)

Professor [redacted] shared that Professor [redacted] did not observe Kupsh "link arms" with individuals or "block" Bruin Walk during the alleged incident.

Professor [redacted] shared that Professor [redacted] observed Kupsh follow instructions given by "administrators and the police."

Professor [redacted] shared that Professor [redacted] was with Kupsh "the entire day."

Professor [redacted] shared that Kupsh was not a "leader of the protestors."

Professor [redacted] shared that Kupsh was a "liaison between protestors and the University."

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Professor [redacted] stated, "Before reaching Bruin Plaza, students stopped toward the bottom of Bruin Walk and linked arms. Students not participating in the protest simply walked around the protest, either on the south… or north edge, and continued up Bruin Walk."

Professor [redacted] stated, "I did not see any protester physically prevent anyone from walking on Bruin Walk."

Professor [redacted] stated, "The officials told [Kupsh] that protesters needed to stop linking arms."

Professor [redacted] shared that Kupsh "complied with University instructions."

Professor [redacted] shared that Kupsh spoke to protestors to "unlink arms."

Professor [redacted] stated, "[Kupsh] was not linking arms himself, was not blocking anyone, and was not engaging in the protest. [Kupsh] followed Student Affairs and police instructions."

Professor [redacted] stated, "[Kupsh] did not block the walkway. [Kupsh] stood between protesters and counter-protesters at times, because the counter-protesters were threatening and perpetrating violence."

Professor [redacted] shared that Kupsh did not fail to comply with directions from University officials during the alleged incident. Professor [redacted] stated, "[Kupsh] was asked first to tell students they needed to move. [Kupsh] did so."

In response to questions from Kupsh, Professor [redacted] shared the following:

> Professor [redacted] shared that Professor [redacted] did not observe Kupsh "mirror" individuals' movements during the alleged incident.
>
> Professor [redacted] shared that Kupsh did not represent himself as an organizer during the alleged incident.
>
> Professor [redacted] shared that Kupsh did not control Professor Blair's actions during the alleged incident.

[redacted] (Assistant Professor of Asian American Studies and Presentation from Witness)

Professor [redacted] shared a statement written by Associate Professor of American Studies, [redacted] (Professor [redacted]). Professor [redacted] shared the following from Professor [redacted]' statement:

> Professor [redacted] shared that Professor [redacted] was standing next to Kupsh for "nearly two hours" during the alleged incident.

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Professor [redacted] stated, "I did not see [Kupsh] obstruct or block any persons using their body or any object."

Professor [redacted] stated, "I did not see [Kupsh] holding the sign, nor did [Kupsh] use any freestanding sign to block passageways."

Professor [redacted] stated, "I saw [Kupsh] briefly speak with some passers-by. It appeared they were asking [Kupsh] for directions. [Kupsh] pointed in several directions, and the passers-by nodded and walked on."

Professor [redacted] stated, "[Kupsh] was not involved in any prohibitive behavior and did not commit misconduct."

[redacted] (Design Media Arts Lecturer and Presentation from Witness)

Lecturer [redacted] shared that Lecturer [redacted] was present during the alleged incident.

Lecturer [redacted] shared that Lecturer [redacted] could see Kupsh "nearly the entire time" of the alleged incident.

Lecturer [redacted] stated, "I never witnessed [Kupsh] fail to comply with any University policy. I never saw him fail to identify himself to any University official. I never saw him engage in any obstruction or a disruption."

Lecturer [redacted] shared that Lecturer [redacted] did not observe Kupsh "block anything."

Lecturer [redacted] shared that Lecturer [redacted] did not observe Kupsh direct individuals to "block anything."

Lecturer [redacted] shared that Kupsh was not a "protestor" or "protest organizer."

Lecturer [redacted] stated, "[Kupsh] was acting as a liaison in between the group of student protesters and University officials and police."

Lecturer [redacted] shared that Kupsh's green vest did not "signify" that Kupsh was an organizer.

Lecturer [redacted] shared that Kupsh did not "link" arms with individuals during the alleged incident.

Lecturer [redacted] stated:

> "At no single point did I witness the entrance or egress to a building or area of campus being blocked, except for the literal space occupied by the feet and bodies of student protesters. Pedestrians could enter the stairs and front entrance of Ackerman."

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Lecturer [redacted] further stated, "Pedestrians could also walk just off the path to the north of Bruin Walk and reach Bruin Plaza. Later, I saw [SAMs] directing pedestrians to go this way."

Lecturer [redacted] stated, "[SAMs] came in past the bike security and told [Kupsh] that students were not able to get to their cars." Lecturer [redacted] shared that Kupsh spoke with the SAMs to communicate that Kupsh "was not there to block anyone, and that [Kupsh] was not a leader or organizer."

Lecturer [redacted] shared that Lecturer [redacted] did not observe Kupsh "block" individuals with a sign.

Lecturer [redacted] stated:

> "Four students passed through where the bike security were, near to where [Kupsh] and [Miller] were speaking. Once they passed through and could see the picketers with their arms linked, two turned around and went back the way they came, and two decided to go around the picketers, near the bushes on the north side. [Kupsh] did not block or direct any of these people.

Lecturer [redacted] shared that Lecturer [redacted] observed SAMs direct individuals to walk through bushes near Bruin Walk to get around the "picket."

Lecturer [redacted] shared that Lecturer [redacted] observed Kupsh speak with a UCPD officer to ask if there was a message that Kupsh could relay to individuals. Lecturer [redacted] shared that the UCPD officer "refused" to communicate with Kupsh.

Lecturer [redacted] shared that UCPD officers did not issue a dispersal order during the alleged incident.

Lecturer [redacted] shared that UCPD officers did not communicate orders to Kupsh.

In response to questions from Kupsh, Lecturer [redacted] shared the following:

> Lecturer [redacted] stated, "No, I never witnessed [Kupsh] mirror anyone's movements or block anyone walking through Bruin Walk."
>
> Lecturer [redacted] shared that Lecturer [redacted]'s actions were not controlled by Kupsh during the alleged incident.
>
> Lecturer [redacted] shared that Lecturer [redacted] did not observe Kupsh failing to comply with orders from University officials.
>
> Lecturer [redacted] shared that Lecturer [redacted] observed Kupsh "carrying messages between admin and the group of protestors."

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Lecturer [redacted] shared that Lecturer [redacted] did not observe Kupsh "participate in creating a human blockade, interfere with the free flow of campus traffic, block an individual from moving through bushes, [or] refuse to comply with a University official's instructions."

Dylan Kupsh (Presentation from the Accused Student)

Kupsh stated that "student organizers" asked Kupsh to be a police liaison for the "demonstration" on November 19, 2024.

Kupsh stated, "When serving as the police liaison, I'm not the organizer for the demonstration, nor can I make decisions on behalf of the protests." Kupsh further stated, "I'm only there to serve as the intermediary between the police and demonstrators."

Kupsh shared that "students" gave Kupsh a "high-vis" vest to wear on November 19, 2024.

Kupsh stated, "After around twenty minutes of them marching in circles and thinking that the protests would be over soon, I grabbed a sign that I really like."

Kupsh shared that Kupsh went to the "Ackerman staircase" to "sit down and rest."

Kupsh shared that Kupsh's "vision of the protest was a little bit obscured because of the staircase in Ackerman."

Kupsh shared that individuals "linked arms across Bruin Walk" without Kupsh's knowledge.

Kupsh shared that Kupsh did not observe individuals while they were "linking arms." Kupsh stated, "I remember seeing… the final result of it."

Kupsh shared that one of the SAMs alleged that Kupsh was a "group leader and responsible for the actions of everyone in the protests." Kupsh shared that Kupsh recalled telling the SAM that Kupsh was not "responsible for their actions."

Kupsh stated, "Whenever someone brought up that I was the leader, I would tell them, 'I don't control the actions of others, I only control my own actions, and I'm happy to communicate messages, but I am not able to… clear this blockade.'"

Kupsh shared that Kupsh told the SAMs that Kupsh was not "blocking" individuals from moving.

Kupsh shared that Kupsh was standing 50 feet away from the "human blockade."

Kupsh shared that Kupsh offered to "communicate messages" during the alleged incident. Kupsh noted that Kupsh was not given messages to communicate during the alleged incident.

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Kupsh shared that an individual asked Kupsh how the individual could get around the "demonstration." Kupsh shared that Kupsh told the individual that Kupsh "didn't control the actions of other individuals" and that Kupsh could "ask" individuals participating in the "demonstration" on the behalf of the individual that wanted to get around the "demonstration." Kupsh stated:

> "I went and asked, and I was told that they couldn't get through, and I relayed this back to the student. I remember strategizing them with options to bypass the blockade. You know, I saw a lot of people going through the bushes and to the side of the demonstrations, and I pointed that out."

Kupsh shared that Kupsh told the individual that wanted to get around the "demonstration" that there were elevators in Ackerman Union to "bypass the blockade."

Kupsh stated, "I remember there was a few other individuals and trying to strategize with them about trying to bypass the protests. I was telling them that their best shot was to go around through the bushes, advice that was later replicated by University officials."

Kupsh shared that Kupsh moved closer to the line of individuals participating in the "blockade."

Kupsh shared that Kupsh recalled telling Miller that Kupsh "wasn't responsible for the actions of others."

Kupsh stated:

> "I remember there was a girl who went and asked me if they could get through, and as I knew the answer, because I've asked before if they could get through, I knew the answer was no. And so, I communicated that, and I was also trying to give them alternative directions, and they frustratedly turn around and walk away. You know, I understand their actions and their frustration, but I also did not block them."

Kupsh shared that Bruin Walk is 100 feet in width. Kupsh shared that "the sign" was "at most, six feet."

Kupsh shared that Kupsh recalled informing two individuals about "ways to get around the blockade." Kupsh recalled that the two individuals thanked Kupsh for the information that Kupsh provided them. Kupsh shared that Kupsh did not "move a sign to block them."

Kupsh stated, "I was primarily focused on my main role, which is to help with conversations between UCPD, and others."

Kupsh shared that Kupsh recalled "having to climb through the bushes" to get around the "protests."

Kupsh shared a video of the alleged incident taken by Professor [redacted]. Kupsh shared the following regarding the video:

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Kupsh shared that the video showed "the actions of SAMs" during the alleged incident.

Kupsh shared that the video showed "the length of the line" of "protestors."

Kupsh shared that the video showed that Kupsh did not "interlink arms" with other individuals.

Kupsh shared that Miller stated that Miller did not want to walk around the protestors. Kupsh shared that Miller "explicitly refuses to go around the protestors."

Kupsh shared that SAMs approached Kupsh approximately one minute into the video. Kupsh stated:

> "I want to kind of hide from [SAMs], because… if they're gonna make contact to me… they're gonna have to call my name. I don't want to just have… incidental contact with them. And so, I go back toward the sign and the other protesters."

Kupsh shared that the video showed that the SAMs were able to "go through the bushes to the other side of the demonstration." Kupsh shared that the SAMs were "unobstructed."

Kupsh shared a video taken by Kupsh during the alleged incident. Kupsh shared the following regarding the video:

Kupsh shared that the video showed "the main conversation" that Kupsh had with UCPD.

Kupsh shared that a UCPD officer used a cell phone to record video of Kupsh. Kupsh noted that the UCPD officers in the video wore "body cameras."

Kupsh shared that Kupsh told the UCPD officers that Kupsh was not a "leader of the group."

Kupsh shared that a UCPD officer "agrees" with Kupsh regarding that Kupsh "cannot control the actions of others." Kupsh shared that the UCPD officer wanted Kupsh to "deliver a message."

Kupsh shared that a UCPD officer told Kupsh that "there is a violation of the law." Kupsh stated, "I don't think there's a violation of the law, so, I'm asking them to verify this." Kupsh shared that Kupsh asked the UCPD officer to provide "the correct law" in question to be able to "communicate a message" to individuals on Bruin Walk.

Kupsh shared that a UCPD officer told Kupsh that *California Code of Regulations: 1503* was in question during the alleged incident. Kupsh shared that *California Code of Regulations: 1503* was regarding "sales tax at universities of at hospitals and medical care facilities." Kupsh shared that *California Code of Regulations: 1503* was "the only

actual law that [Kupsh] got when [Kupsh] asked the police about what people were violating."

Kupsh stated, "My actions are distinct from the actions of other protesters, and I think in this situation, it's quite clear that I'm not violating the law."

Kupsh shared that "counter-protestors" arrived to Bruin Walk "off-camera."

Kupsh shared that a SAM states that the SAM "will not be engaging in conversation." Kupsh shared that the SAM Kupsh was speaking with alleged that Kupsh was violating University policy. Kupsh shared that Kupsh told the SAM that "people are able to get by [Kupsh]."

Kupsh stated, "[UCPD officers] are trying to make up laws, but none of what he actually says was an actual legal provision." Kupsh further stated, "And then at several other points, they mention university policy, but that's not actually a law."

Kupsh shared that Kupsh told UCPD officers that Kupsh was not an organizer and could only control Kupsh's actions. Kupsh shared that Kupsh told the UCPD officers that Kupsh was not "blocking anyone from accessing Bruin Walk."

Kupsh shared that Kupsh communicated a "message" to "protestors" after being directed by a University official. Kupsh shared that Kupsh spoke with each "protestor" individually.

Kupsh shared that Kupsh was "interrupted" by a "counter-protestor" when Kupsh was speaking with "protestors."

Kupsh stated, "At no point did I ever try to block anyone from passing through Bruin Walk, or did I interlink arms with any other protesters."

Kupsh stated:

> "I served as the messenger and liaison between protesters and UCPD. I was not an organizer. I did not have the power to control the other protesters' actions. I did not have the ability to get them to, either interlink arms or not interlink arms. I personally did not block Bruin Walk, nor did I participate in the human blockade."

Kupsh shared that Kupsh asked the "protestors" if "people can get through." Kupsh shared that Kupsh's requests were "ignored."

Kupsh shared that Kupsh told Miller that Kupsh was not "blocking" individuals on Bruin Walk.

Kupsh shared that Kupsh complied with the order that UCPD provided to Kupsh regarding delivering messages to "protestors."

Kupsh shared that Kupsh was not an organizer during the alleged incident.

Kupsh stated, "There's no footage of me blocking someone from, from going through the bushes." Kupsh further stated, "I was telling people how to get around, and I was actually saying the bush might be your best option for a lot of people, because they weren't able to pass through the people behind me."

In response to questions from the Panel, Kupsh shared the following:

> Kupsh shared that Kupsh was "continually focused on University administration and public affairs people" during the alleged incident.
>
> Kupsh shared that Kupsh was "interrupted" by SAMs and individuals that were asking Kupsh how to get around the individuals on Bruin Walk.
>
> Kupsh shared that Kupsh told SAMs that Kupsh could communicate the SAMs "desires" to the individuals on Bruin Walk.
>
> Kupsh stated, "I saw pedestrians being restricted and delayed, and I was trying to help them as much as possible. I did not cause the delay."
>
> Kupsh stated, "I never used the sign as a tool to block anyone's pedestrian access, I remember… I didn't move the sign in front of someone as they were trying to get by."
>
> Kupsh shared that Kupsh would have used "the sign" to protect himself from a specific individual that was present during the alleged incident.
>
> Kupsh shared that "demonstrators" denied Kupsh's request for the "demonstrators" to let individuals pass through the "blockade."

V. Analysis

The Panel reviewed the information from the Hearing packet and the statements presented by Dean Nieves, Director Hodgman, Witnesses, and Kupsh during the Hearing, in making their findings regarding the allegations.

Applicable *Code* Version: January 1, 2021

102.07: Violations of University Policy

Students may be subject to discipline for violation of any University policy.

UCLA Interim Policy 850: General Use of UCLA Property

Individuals on UCLA Property may not:

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1. block entrances to or otherwise interfere with the free flow of campus traffic (pedestrian or vehicular) into and out of campus facilities, or along walkways or roadways;

2. knowingly and willfully interfere with the peaceful conduct of activities or another individual's ability to participate in their educational program on UCLA Property;

3. delay or linger without lawful purpose for being on UCLA Property and for the purpose of committing a crime or violation of these policies or laws;

16. fail to comply with the directions of a Designated University Official acting in the performance of their duties;

UCLA Interim Policy 852: Public Expression Activities

a. Individuals and groups may not impede or disrupt foot and vehicular traffic. Obstructing, disrupting, or otherwise interfering with the instructional, research, or administrative operations of the University, or any other person having lawful business with the University is not permissible. Reasonable access to and exit from classrooms, laboratories, parking structures, offices and buildings must be provided at all times.

UCLA Interim Policy 860: Organized Events

In addition to this Policy and related Use Policies, as outlined UCLA Policy 850: General Use of UCLA Property, an Event Organizer must comply with the specific requirements and scheduling procedures of the Campus Venue Scheduler that may host the Organized Event. The policies and scheduling procedures for each specific Campus Venue Scheduler may vary.

Reservations are finalized only after arrangements have been approved in accordance with this Policy. Permission to use UCLA Property is not to be construed as endorsement by the University.

102.16: Failure to Comply

Failure to identify oneself to, or comply with directions of, a University official or other public official acting in the performance of one's duties while on University property or at official University functions, or resisting or obstructing such University or other public officials in the performance of or the attempt to perform their duties.

The Panel referred to these definitions of the prohibited behavior in determining whether they believe Kupsh's behavior constituted a violation.

In particular, the Panel focused on the following:

The Panel reviewed Professor [redacted]'s presentation; specifically, Professor [redacted] shared that Professor [redacted] did not hear a dispersal order from UCPD officers. The Panel reviewed Lecturer [redacted]'s presentation; specifically, Lecturer [redacted] shared that UCPD officers did not issue a

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dispersal order during the alleged incident. The Panel reviewed [redacted]'s presentation; specifically, [redacted] shared that [redacted] observed Kupsh relay messages to the event organizers during the alleged incident. The Panel reviewed Professor [redacted]'s presentation; specifically, Professor [redacted] shared that Kupsh did not fail to comply with directions from University officials during the alleged incident. Professor [redacted] stated, "[Kupsh] was asked first to tell students they needed to move. [Kupsh] did so." The Panel reviewed Kupsh's presentation; specifically, Kupsh shared that a UCPD officer wanted Kupsh to "deliver a message." The Panel reviewed Dean Nieves' presentation; specifically, in a meeting between Miller and Dean Nieves, Miller shared that Miller informed Kupsh that the individuals gathered at Bruin Walk would need to relocate. Miller shared that Kupsh did not relocate. The Panel reviewed Kupsh's presentation; specifically, Kupsh shared that Kupsh complied with the order that UCPD provided to Kupsh regarding delivering messages to "protestors." The Panel reviewed Lecturer [redacted]'s presentation; specifically, Lecturer [redacted] shared that Lecturer [redacted] observed Kupsh "carrying messages between admin and the group of protestors."

The Panel concluded that there was Insufficient Information to determine that Kupsh failed to comply with instructions from University officials, because the Panel found it probable that Kupsh complied with the instructions from Miller and UCPD regarding Kupsh being directed to inform individuals on Bruin Walk not to "block" the walkway. The Panel found [redacted], Lecturer [redacted], Professor [redacted], and Professor [redacted]'s statements to be consistent, in regards to Kupsh relaying messages from University officials to individuals of the "blockade," therefore, the Panel determined that the statements were credible, which would not constitute Kupsh allegedly failing to comply with University officials' instructions. Additionally, the Panel considered Lecturer [redacted] and Professor [redacted]'s statements regarding UCPD not issuing a dispersal order, and found it reasonable that Kupsh did not relocate from Bruin Plaza during the alleged incident. The Panel found it probable that Kupsh did not relocate from Bruin Plaza during the alleged incident, because UCPD and SAMs asked Kupsh to "deliver" messages to the individuals participating in the "blockade."

Therefore, for the reasons listed above, the Panel found that there was Insufficient Information to find by a preponderance standard that Kupsh violated Section 102.16 (Failure to Comply) of the *UCLA Student Conduct Code.*

The Panel considered the following information when determining if Kupsh violated Section 102.07 (Violations of University Policy) specifically, Section IV.A. of the *UCLA Interim Policy 850: General Use of UCLA Property* [with respect to interfering with the free flow of campus traffic]:

The Panel reviewed Dean Nieves' presentation; specifically, in a meeting between Dean Nieves and Miller, Miller shared that Miller informed Kupsh that Kupsh was "blocking others from getting by." The Panel reviewed Dean Nieves' presentation; specifically, in a meeting between Dean Nieves and Miller, Miller shared that an individual "attempted to get through bushes to get by the formed lines of individuals interlocked in arms." Miller shared that Kupsh "moved in such a way to obstruct" the individual. Miller shared that Miller observed that Kupsh "mirrored" the individual's movements when the individual attempted to get past Kupsh. The Panel reviewed Dean Nieves' presentation; specifically, in a non-affiliate video that Dean Nieves shared, Dean

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Nieves shared that an individual in the video was attempting to get through a line of individuals, one of which included Kupsh. Dean Nieves shared that Kupsh's back was initially oriented towards the individual attempting to get through the line of individuals. Dean Nieves shared that Kupsh turned around and verbally engaged with the individual. Dean Nieves shared that the individual states that the individual wished to get through a particular passage of the line of individuals. Dean Nieves shared that Kupsh did not move when the individual stated the individual's wish to pass through the line. The Panel reviewed Dean Nieves' presentation; specifically, in a video submitted by UCPD Captain, Scott Scheffler, Dean Nieves shared that Kupsh had both of Kupsh's hands on the metal rod portion of the frame of the sign at four minutes and ten seconds of the video. Dean Nieves shared that Dean Nieves observed an individual with a camera walk to the right-hand side of the screen. Dean Nieves stated, "At this time. [Kupsh] appears to notice the individual walking to the right side, and then positions the sign further to the right." The Panel reviewed Dean Nieves' presentation; specifically, in a video submitted by UCPD Captain, Scott Scheffler, Dean Nieves stated, "I point this out because as the reviewer, it is my position that [Kupsh's] moving of the sign is in response to this individual appearing to try to walk down this pathway, and stops the movement of the sign when this individual stops." The Panel reviewed Dean Nieves' presentation; specifically, in a video submitted by UCPD Captain, Scott Scheffler, Dean Nieves shared that Dean Nieves observed Kupsh position the sign in a manner that blocked two women's access to a walkway at four minutes and thirty-five seconds of the video.

The Panel concluded that there was Sufficient Information to determine that Kupsh interfered with the free flow of campus traffic along walkways, because the Panel found it probable that Kupsh's movements in the videos that Dean Nieves presented showed Kupsh "mirroring" individuals' movements in attempts to walk around Kupsh. After the Panel reviewed videos presented by Dean Nieves, the Panel determined that Kupsh did not move himself or move the sign that Kupsh possessed to allow individuals walk around Kupsh when individuals approached Kupsh.

The Panel considered the following information when determining if Kupsh violated Section 102.07 (Violations of University Policy) specifically, Section IV.A. of the *UCLA Interim Policy 850: General Use of UCLA Property* [with respect to willfully interfering with another individual's ability participate in their education program on UCLA Property]:

The Panel reviewed Director Hodgman's presentation; specifically, Director Hodgman shared that a female individual spoke to a Public Safety Aid (PSA) at 1:31 P.M. stating that the female individual could not get to her car due to the activity during the alleged incident. The Panel reviewed Dean Nieves' presentation; specifically, in a non-affiliate video that Dean Nieves shared, Dean Nieves shared that an individual in the video was attempting to get through a line of individuals, one of which included Kupsh. Dean Nieves shared that Kupsh's back was initially oriented towards the individual attempting to get through the line of individuals. Dean Nieves shared that Kupsh turned around and verbally engaged with the individual. Dean Nieves shared that the individual states that the individual wished to get through a particular passage of the line of individuals. Dean Nieves shared that Kupsh did not move when the individual stated the individual's wish to pass through the line. The Panel reviewed Dean Nieves' presentation; specifically, in a video submitted by UCPD Captain, Scott Scheffler, Dean Nieves shared that

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Kupsh had both of Kupsh's hands on the metal rod portion of the frame of the sign at four minutes and ten seconds of the video. Dean Nieves shared that Dean Nieves observed an individual with a camera walk to the right-hand side of the screen. Dean Nieves stated, "At this time. [Kupsh] appears to notice the individual walking to the right side, and then positions the sign further to the right." The Panel reviewed Dean Nieves' presentation; specifically, in a video submitted by UCPD Captain, Scott Scheffler, Dean Nieves stated, "I point this out because as the reviewer, it is my position that [Kupsh's] moving of the sign is in response to this individual appearing to try to walk down this pathway, and stops the movement of the sign when this individual stops."

The Panel concluded that there was Insufficient Information to determine that Kupsh willfully interfered with another individual's ability to participate in their educational program on UCLA Property, because the Panel determined that there was not specific information regarding an educational program being interfered with from any of the statements from the Hearing participants or information presented in the Hearing packet. The Panel noted that Director Hodgman's presentation contained information regarding an individual reporting that they were not able to access their car, therefore, the Panel determined that an individual being unable to access their car did not constitute the interference of an individual being able to participate in an educational program. The Panel noted that the "demonstration" itself may have interfered with an individual's ability to participate in their educational program, and further noted that Kupsh's individual behavior did not constitute the interference of an individual being able to participate in an educational program. Additionally, the Panel concluded that there was not enough information to determine that Kupsh's alleged "blocking" of individuals in the videos presented by Dean Nieves constituted Kupsh interfering with individual being able to participate in an educational program, rather than generally interfering with the free flow of campus traffic.

The Panel considered the following information when determining if Kupsh violated Section 102.07 (Violations of University Policy) specifically, Section IV.A. of the *UCLA Interim Policy 850: General Use of UCLA Property* [with respect to delaying or lingering without lawful purpose for being on UCLA Property]:

The Panel reviewed Kupsh's presentation; specifically, Kupsh shared that in a video that Kupsh recorded of the alleged incident, Kupsh shared that a UCPD officer "agrees" with Kupsh regarding that Kupsh "cannot control the actions of others." Kupsh shared that the UCPD officer wanted Kupsh to "deliver a message." The Panel reviewed Kupsh's presentation; specifically, Kupsh shared that in a video that Kupsh recorded of the alleged incident, Kupsh shared that a UCPD officer told Kupsh that *California Code of Regulations: 1503* was in question during the alleged incident. Kupsh shared that *California Code of Regulations: 1503* was regarding "sales tax at universities of at hospitals and medical care facilities." Kupsh shared that *California Code of Regulations: 1503* was "the only actual law that [Kupsh] got when [Kupsh] asked the police about what people were violating."

The Panel concluded that there was Insufficient Information to determine that Kupsh delayed or lingered without lawful purpose for being on UCLA Property and for the purpose of committing a crime, because the Panel considered that the UCPD officers that were speaking with Kupsh did not provide a citation that was related to the allegations in question. The Panel further noted that

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if UCPD determined that Kupsh was participating in lingering without a lawful purpose for being on UCLA Property and for the purpose of committing a crime, that UCPD would have apprehended Kupsh, rather than request Kupsh to "deliver a message" to individuals participating in the "demonstration" on Bruin Walk.

The Panel considered the following information when determining if Kupsh violated Section 102.07 (Violations of University Policy) specifically, Section IV.A. of the *UCLA Interim Policy 850: General Use of UCLA Property* [with respect to failing to comply with the directions of a Designated University Official acting in the performance of their duties]:

The Panel reviewed Professor Hong's presentation; specifically, Professor [redacted] shared that Professor [redacted] did not hear a dispersal order from UCPD officers. Additionally, the Panel reviewed Lecturer [redacted]'s presentation; specifically, Lecturer [redacted] shared that UCPD officers did not issue a dispersal order during the alleged incident. The Panel reviewed Esquee's presentation; specifically, [redacted] shared that [redacted] observed Kupsh relay messages to the event organizers during the alleged incident. The Panel reviewed Professor Blair's presentation; specifically, Professor [redacted] shared that Kupsh did not fail to comply with directions from University officials during the alleged incident. Professor [redacted] stated, "[Kupsh] was asked first to tell students they needed to move. [Kupsh] did so." The Panel reviewed Kupsh's presentation; specifically, Kupsh shared that a UCPD officer wanted Kupsh to "deliver a message." The Panel reviewed Dean Nieves' presentation; specifically, in a meeting between Miller and Dean Nieves, Miller shared that Miller informed Kupsh that the individuals gathered at Bruin Walk would need to relocate. Miller shared that Kupsh did not relocate. The Panel reviewed Kupsh's presentation; specifically, Kupsh shared that Kupsh complied with the order that UCPD provided to Kupsh regarding delivering messages to "protestors." The Panel reviewed Lecturer [redacted]'s presentation; specifically, Lecturer [redacted] shared that Lecturer [redacted] observed Kupsh "carrying messages between admin and the group of protestors."

The Panel concluded that there was Insufficient Information to determine that Kupsh failed to comply with instructions from University officials, because the Panel found it probable that Kupsh complied with the instructions from Miller and UCPD regarding Kupsh being directed to inform individuals on Bruin Walk not to "block" the walkway. The Panel found Esquee, Lecturer [redacted], Professor [redacted], and Professor [redacted]'s statements to be consistent, in regards to Kupsh relaying messages from University officials to individuals of the "blockade," therefore, the Panel determined that the statements were credible, which would not constitute Kupsh allegedly failing to comply with University officials' instructions. Additionally, the Panel considered Lecturer [redacted] and Professor [redacted]'s statements regarding UCPD not issuing a dispersal order, and found it reasonable that Kupsh did not relocate from Bruin Plaza during the alleged incident. The Panel found it probable that Kupsh did not relocate from Bruin Plaza during the alleged incident, because UCPD and SAMs asked Kupsh to "deliver" messages to the individuals participating in the "blockade."

Therefore, for the reasons listed above, the Panel found that there was Sufficient Information to find by a preponderance standard that Kupsh violated Section 102.07 (Violations of University Policy) specifically, Section IV.A. of the *UCLA Interim Policy 850: General Use of UCLA*

Property [with respect to interfering with the free flow of campus traffic], of the *UCLA Student Conduct Code.*

The Panel considered the following information when determining if Kupsh violated Section 102.07 (Violations of University Policy) specifically, Section IV. of the *UCLA Interim Policy 852: Public Expression Activities* [with respect to impeding foot traffic]:

The Panel reviewed Dean Nieves' presentation; specifically, in a meeting between Dean Nieves and Miller, Miller shared that Miller informed Kupsh that Kupsh was "blocking others from getting by." The Panel reviewed Dean Nieves' presentation; specifically, in a meeting between Dean Nieves and Miller, Miller shared that an individual "attempted to get through bushes to get by the formed lines of individuals interlocked in arms." Miller shared that Kupsh "moved in such a way to obstruct" the individual. Miller shared that Miller observed that Kupsh "mirrored" the individual's movements when the individual attempted to get past Kupsh. The Panel reviewed Dean Nieves' presentation; specifically, in a non-affiliate video that Dean Nieves shared, Dean Nieves shared that an individual in the video was attempting to get through a line of individuals, one of which included Kupsh. Dean Nieves shared that Kupsh's back was initially oriented towards the individual attempting to get through the line of individuals. Dean Nieves shared that Kupsh turned around and verbally engaged with the individual. Dean Nieves shared that the individual states that the individual wished to get through a particular passage of the line of individuals. Dean Nieves shared that Kupsh did not move when the individual stated the individual's wish to pass through the line. The Panel reviewed Dean Nieves' presentation; specifically, in a video submitted by UCPD Captain, Scott Scheffler, Dean Nieves shared that Kupsh had both of Kupsh's hands on the metal rod portion of the frame of the sign at four minutes and ten seconds of the video. Dean Nieves shared that Dean Nieves observed an individual with a camera walk to the right-hand side of the screen. Dean Nieves stated, "At this time. [Kupsh] appears to notice the individual walking to the right side, and then positions the sign further to the right." The Panel reviewed Dean Nieves' presentation; specifically, in a video submitted by UCPD Captain, Scott Scheffler, Dean Nieves stated, "I point this out because as the reviewer, it is my position that [Kupsh's] moving of the sign is in response to this individual appearing to try to walk down this pathway, and stops the movement of the sign when this individual stops." The Panel reviewed Dean Nieves' presentation; specifically, in a video submitted by UCPD Captain, Scott Scheffler, Dean Nieves shared that Dean Nieves observed Kupsh position the sign in a manner that blocked two women's access to a walkway at four minutes and thirty-five seconds of the video.

The Panel concluded that there was Sufficient Information to determine that Kupsh impeded foot traffic, because the Panel found it probable that Kupsh's movements in the videos that Dean Nieves presented showed Kupsh "mirroring" individuals' movements in attempts to walk around Kupsh. After the Panel reviewed videos presented by Dean Nieves, the Panel determined that Kupsh did not move himself or move the sign that Kupsh possessed to allow individuals walk around Kupsh when individuals approached Kupsh.

Therefore, for the reasons listed above, the Panel found that there was Sufficient Information to find by a preponderance standard that Kupsh violated Section 102.07 (Violations of University

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Policy) specifically, Section IV. of the *UCLA Interim Policy 852: Public Expression Activities* [with respect to impeding foot traffic] of the *UCLA Student Conduct Code.*

The Panel considered the following information when determining if Kupsh violated Section 102.07 (Violations of University Policy) specifically, Section 102.07 (Violations of University Policy) specifically, Section III. of *UCLA Interim Policy 860: Organized Events* [with respect to an Event Organizer complying with the specific requirements and scheduling procedures of the Campus Venue Scheduler]:

The Panel reviewed Dean Nieves' presentation; specifically, Dean Nieves shared that Director Hodgman's summary of the allegations stated, "Kupsh claimed not to be an event organizer, but stated [Kupsh] could relay messages." Dean Nieves recalled Director Hodgman describing Kupsh as "an apparent organizer." The Panel reviewed Dean Nieves' presentation; specifically, in a meeting between Miller and Dean Nieves, Miller referred to Kupsh as an "organizer" of the event. The Panel reviewed Dean Nieves' presentation; specifically, Dean Nieves shared that there was no information that Dean Nieves reviewed where Kupsh self-identified as the organizer of the event that took place during the alleged incident. The Panel reviewed Student Witness 1's presentation; specifically, Student Witness 1 shared that Student Witness 1 "had involvement in the prep" for the "protest" that took place on November 19, 2024. Student Witness 1 shared that Kupsh was not an organizer of the "protest." The Panel reviewed [redacted]'s presentation; specifically, [redacted] shared that [redacted] was an organizer for the "March Against Genocide" on November 19, 2024. The Panel reviewed [redacted]'s presentation; specifically, [redacted] shared that [redacted] observed Kupsh relay messages to the event organizers during the alleged incident. The Panel reviewed Lecturer [redacted]'s presentation; specifically, Lecturer [redacted] shared that Kupsh was not a "protestor" or "protest organizer." The Panel reviewed Professor [redacted]'s presentation; specifically, Professor [redacted] shared that Kupsh was not a "leader of the protestors." The Panel reviewed Kupsh's presentation; specifically, Kupsh shared that Kupsh was not an organizer during the alleged incident.

The Panel concluded that there was Insufficient Information to determine that Kupsh was an Event Organizer, because the Panel considered statements from Student Witness 1 and [redacted] who stated that they were involved with the preparation for the event or an organizer of the event that took place on November 19, 2024. The Panel considered that Student Witness 1 and Esquee stated that Kupsh was not an organizer of the "protest," therefore, the Panel determined that Kupsh was not expected to comply with the specific requirements and scheduling procedures of the Campus Venue Scheduler. The Panel found that Director Hodgman and Miller's description of Kupsh being an organizer conflicted with statements from Student Witness 1, [redacted], Professor [redacted], and Lecturer [redacted], therefore, the Panel determined that there was Insufficient Information to confirm that Kupsh was an organizer of the "protest" that took place on November 19, 2024.

Therefore, for the reasons listed above, the Panel found that there was Insufficient Information to find by a preponderance standard that Kupsh violated Section 102.07 (Violations of University Policy) specifically, Section III. of *UCLA Interim Policy 860: Organized Events* [with respect to an Event Organizer complying with the specific requirements and scheduling procedures of the Campus Venue Scheduler] of the *UCLA Student Conduct Code.*

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Therefore, for the reasons listed above, the Panel found that there was Insufficient Information to find by a preponderance standard that Kupsh violated Section 102.16 (Failure to Comply) and 102.07 (Violations of University Policy) specifically, Section III. of *UCLA Interim Policy 860: Organized Events* [with respect to an Event Organizer complying with the specific requirements and scheduling procedures of the Campus Venue Scheduler] of the *UCLA Student Conduct Code.*

Therefore, for the reasons listed above, the Panel found that there was Sufficient Information to find by a preponderance standard that Kupsh violated Section 102.07 (Violations of University Policy) specifically, Section IV.A. of the *UCLA Interim Policy 850: General Use of UCLA Property* [with respect to interfering with the free flow of campus traffic], Section IV. of the *UCLA Interim Policy 852: Public Expression Activities* [with respect to impeding foot traffic] of the *UCLA Student Conduct Code.*

VI. Recommended Sanction

Upon a finding of responsibility for a violation of Section 102.07 (Violations of University Policy), specifically, Section IV. of the *UCLA Interim Policy 850: General Use of UCLA Property* [with respect to interfering with the free flow of campus traffic], and Section IV. of the *UCLA Interim Policy 852: Public Expression Activities* [with respect to impeding foot traffic], Interim Director and Associate Dean of Students Benito Nieves recommended a sanction of **Suspension for two Quarters (Summer Quarter 2026 and Fall Quarter 2026: June 22, 2026 – December 11, 2026).**

Suspension is the termination of UCLA student status for a specified academic term or terms. You are ineligible to enroll in UCLA Extension concurrent courses during the period of Suspension. You may not transfer or register for courses at another campus or location of the University of California during the period of Suspension. You are considered not in good conduct standing for the duration of the Suspension period. Further violations of the *UCLA Student Conduct Code* or failure to complete any assigned conditions may result in additional disciplinary action including, but not limited to, an additional Suspension period, or Dismissal. The conditions of the Suspension include the following:

The condition of the Suspension includes the following:

Meeting with the Office of Student Conduct: You must schedule and attend a follow-up meeting with Interim Director and Associate Dean of Students Benito Nieves, by **October 9, 2026**. The purpose of this meeting is to assess your re-admission process to return to the University. Please call 310-825-3871, or email bnieves@saonet.ucla.edu to schedule a meeting.

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EXHIBIT F

UNIVERSITY OF CALIFORNIA, LOS ANGELES

BERKELEY • DAVIS • IRVINE • LOS ANGELES • MERCED • RIVERSIDE • SAN DIEGO • SAN FRANCISCO

U

SANTA BARBARA • SANT

OFFICE OF STUDENT CO
1104 MURPH
BOX
LOS ANGELES, CA 900

February 06, 2025

CONFIDENTIAL

Dylan Kupsh
dkupsh@ucla.edu
Log No.: 06283-001-2024

Dear Dylan,

The Office of Student Conduct has received information indicating that you may have been involved in an incident wh University regulations regarding student conduct.

Specifically, it has been reported that on or around June 10, 2024, in a campus public space near Young Hall, you bloc ee flow of campus pedestrian traffic by blocking a student's access to a space on or around Young Hall.

If this allegation is true, your behavior is in violation of **Sections 102.07 (Violations of University Policy) [in ref Time, Place and Manner, with respect to blocking pedestrian access)** of the *UCLA Student Conduct Code*, and may affect your s tus.

It is important to familiarize yourself with the *Code*. Specifically, you may wish to refer to Section III of the *Code*, enti nt Conduct Procedures. The *UCLA Student Conduct Code* may be accessed on the Internet at www.deanofstudents.ucla.edu. To learn more ab ces and support that is available to you, please click here.

9202/21/01

UNIVERSITY OF CALIFORNIA, LOS ANGELES **UCLA**

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OFFICE OF STUDENT CONDUCT
1104 MURPHY HALL
BOX 951415
LOS ANGELES, CA 90095-1405

February 06, 2025

CONFIDENTIAL

Dylan Kupsh
dkupsh@ucla.edu
Log No.: 06283-001-2024

Dear Dylan,

The Office of Student Conduct has received information indicating that you may have been involved in an incident which violates University regulations regarding student conduct.

Specifically, it has been reported that on or around June 10, 2024, in a campus public space near Young Hall, you blocked the free flow of campus pedestrian traffic by blocking a student's access to a space on or around Young Hall.

It has further been reported that on or around November 19, 2024, near Bruin Walk, Ackerman Union, and the Student Activities Center, you participated in a human blockade that blocked all east and westbound pedestrian traffic on Bruin Walk.

If this allegation is true, your behavior is in violation of **Sections 102.07 (Violations of University Policy) [in reference to Time, Place and Manner, with respect to blocking pedestrian access)** of the *UCLA Student Conduct Code*, and may affect your student status.

It is important to familiarize yourself with the *Code*. Specifically, you may wish to refer to Section III of the *Code*, entitled Student Conduct Procedures. The *UCLA Student Conduct Code* may be accessed on the Internet at www.deanofstudents.ucla.edu. To learn more about resources and support that is available to you, please click here.

EXHIBIT G

10/12/2026

Interview Notes — Dylan Kupsh (DK) – Case # 06283-001-2024

March 5, 2025: Assistant Dean of Students, Bryan Murotake (Dean Murotake), met with DK to discuss potential violations of the UCLA Student Conduct Code

- Dean Murotake reviewed the process for the meeting and invited the DK to introduce themselves.
    - DK was supported by Thomas Harvey and Professor Saree Makdisi
    - Program Coordinator, Brianna Lambey, served as administrative support.
    - Introductions, FERPA Rights, Document Review, Incident Overview, Code Overview, Next Steps
- Dean Murotake discussed privacy.
    - DK confirmed that he was in a safe and comfortable location to continue the conversation.
    - DK confirmed that he was not recording the conversation.
    - Dean Murotake discussed DK's FERPA and privacy rights.
- Dean Murotake reviewed FERPA rights with exceptions (Health and Safety/Dean case management) with DK.

  DK made the following statement: I would like to note that prior to even having this meeting my FERPA rights were violated by the Office of Student Conduct. As this office well-knows, I am a victim of doxing and serious threats based upon my expression and speech on-campus. I have received copious amounts of hateful and threatening messages, alongside my family and my academic advisor. I have had members of the campus community follow me around campus, bragging about how they know my address and "I won't be safe at home." In the past few weeks, my parents received the following voicemail: "You don't fucking hang up on me you little bitch, you fucking white shit. You fucking raised a Nazi there you fucking cunt. Don't worry, we know all about you. We got you, we know where you live. We know where you fucking get your fucking welfare from you piece of shit... This is not fucking Huntington Beach [my parents house] motherfucker, this is not Huntington Beach. You're not going to do this around us motherfucker. We got you. You're going down". Indeed, there have been several more threatening calls issued to both me and my parents, as a result of UCLA's administration's direct discrimination against me for association with pro-Palestine, Arab shared ancestry. The release of my confidential records to other students and the United States Congress by this university is deeply violating, displaying that the office of student conduct and UCLA administration does not care about my personal safety and physical wellbeing. Although the UCLA student conduct code describes student and faculty sanctions in detail for possible, there is no possible sanctions for university administrators or assistant deans who endanger students by violating their privacy rights. I am participating in this process knowing that those who endanger my physical and mental well-being will not be held accountable by any university-mandated process. The principles of community describe the UCLA community as "ensuring" respectful free expression, not tolerating harassment and profiling and harm based upon political preference and compassionate. Yet, I feel like I'm being punished through these hearings for attempting to live up to these values, for non-violently and respectfully expressing myself upon campus. Indeed, I believe that the student conduct process is precisely

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violating these established principles of community, in what feels like a punitive and unfair process punishing free expression solely based upon political preference or based upon anti-Palestinian racism. Those who have doxed me, physically attacked me, pepper sprayed me, and harassed me have and most likely won't face discipline by this office. This student conduct case specifically enjoins [redacted], who has participated in harassing me and my friends on multiple occasions on campus. From stalking me around campus, following me and my friends into the bathroom and multiple other locations on campus. Violently attacking, physically escalating and disrupting non-violent campus demonstrations, vigils, meetings, Teach-Ins, and other activities. [redacted] has also been known to file false reports with the university, including false Title IX and VI reports, especially to those in which [redacted] politically disagrees with. Just a few weeks ago, several university officials described that this false reporting behavior is extremely well-known, with police officers describing her actions as "false and instigating" and student affairs staff "knowing the character and false reporting circumstances." Indeed, [redacted] behavior was so reprehensible that she was recalled from the Graduate Student Association by a unanimous democratic vote within her own department, in a process that I had no involvement or activity within. Yet, despite this fabricated and deliberately false reporting history, to which has been well-known by university officials, I am still being subjected to a defamatory student conduct investigation.

- Dean Murotake shared with DK to report any student he feels violated the Student Conduct Code.
- DK shared that he believes the Office of Student Conduct and the University do not care about his safety.
- Dean Murotake said that he was unaware of the [redacted] person that DK talked about and encouraged DK to send a report to the Office of Civil Rights.
- In regards to FERPA, DK shared that his FERPA rights were previously violated by the Office of Student Conduct. DK shared that Dean Emily Passer and Theodore Tsau directly violated his FERPA rights. DK also shared that UCLA shared his records surrounding discipline were shared with US Congress
- Dean Murotake instructed DK to report FERPA violations to the Office of Student Conduct. Dean Murotake confirmed that the case details would only be shared amongst employees in the Office of Student Conduct, and would not be shared in any other office.
- DK inquired whether any records surrounding this information would be shared with US Congress or UCLA administration at-large.
- Dean Murotake stated that he would seek DKs explicit permission before any information surrounding his student conduct case was shared with UCLA Administration or US Congress.
- Dean Murotake shared that he was taking notes to best capture the conversation in DK's words.
- DK shared he had concerns with potential accuracy of the meeting notes. DK stated that he feels it is important to only have one record of the notes that best reflects the conversation that takes place. DK made the point that in previous encounters with the deans notes have been unrepresentative and post facto insertions added and DK's corrections not added to the record.

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- Dean Murotake shared that he will take notes that best capture the conversation in DK's words and if needed, will work with DK to address any inconsistencies in the notes. If those notes don't align with DK's recollection DK has the right to address the discrepancy through corrections. Dean Murotake agreed with the importance of having accurate notes.
- Dean Murotake reviewed the ways OSC resolves cases and discussed possible sanctions with the DK.
    - Dean Murotake asks if DK has received the materials from the disciplinary file but DK notes that some of the materials he requested were not received, notably emails between admin and office of student conduct. BM says he can find if there is any additional material. DK made requests through PRA as well and was told that he cannot be provided the emails intra administration or between admin and office of student conduct.
    - DK also said he was denied access to information held by the university. DK notes that the materials and evidence is not complete. The university is in possession of a broader range of evidence and video than what has been made available to DK.
- Dean Murotake moves the meeting to describe the alleged incidents that resulted in this student conduct meeting.
    - DK asks if the charge is the same for the [redacted] listed in documents received.
        - Dean Murotake confirms hat for [redacted], DK is accused of violating the same TPM Policy. Dean Murotake screen-shares UCLA's Time, Place, and Manner Policies from the webpage announcing the Chancellor's email.
    - DK asks for the specific policy that was alleged to be violated in the student conduct letter.
        - Dean Murotake shows the line in the policy around "blocking walkways" from the TPM Policy from the webpage.
    - DK asks on what date the policy that Dean Murotake is referencing was implemented.
        - Dean Murotake responds that this policy was implemented on September 4th in the Chancellor's email, pointing to the UCLA website page.
    - DK asks for what date the [redacted] violation as alleged to have occurred.
        - Dean Murotake states that the [redacted] violation of this policy happened on June 10.
    - DK states that this charge for an alleged action on June 10th for a policy that did not exist until September 4th, a few months later.
        - Dean Murotake states that he will find out the prior policy.
    - DK asks why he is here if we know that the policy that he is accused of did not exist at the time of the alleged violation?
        - [redacted]
    - DK says if he is being charged on a non-existent policy how can he determine whether or not he violated it?
        - [redacted].
    - [redacted]
    - [redacted]

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- [redacted]
- [redacted]
- [redacted]
- [redacted]

- DK shared the following:
  - DK inquired on whether the code charges for the [redacted] incidents that are mentioned in the student's notice letter apply to [redacted] incidents.
  - Dean Murotake shared the UCLA Policy: UCLA Administrative Policies and Procedures as well as UCLA's Time, Place and Manner Policies
  - DK inquired on why he has a student conduct meeting when the specific policy was not in existence at the time of one of the incidents
  - DK shared that the UCLA Policy, in question, did not exist on June 10, 2024, the time of one of the incidents referred to in the student's notice letter.
  - Dean Murotake asked DK whether the student would be able to share the written statements he shared in the meeting with Dean to reflect the record.
  - DK stated that attending the Student Conduct meetings are a hindrance to his purpose at UCLA.
- Dean Murotake ended the meeting due to Mr. Harvey's hard stop at 2:00pm with plans to reschedule to continue the conduct meeting.
  - Professor Makdisi shared that people who support Palestinian and Pro Arab rights are persistently harassed, and that the University is "lopsided" in its treatment of the issue.
- Dean Murotake asked DK if they had any additional question regarding anything shared during the meeting:
  - DK stated the following: I am a member of UAW 4811 and enjoy all the rights and protections of the UAW Collective Bargaining Agreement. The following student conduct actions directly pertain to actions taken within the scope of the collective bargaining agreement and participation within union activity, as evidenced by the inclusion of descriptions surrounding my employment, university strike guidance, and union communications directly within my so-called "disciplinary file." As a represented employee, I have the reasonable belief that this student conduct process could lead to discipline affecting my employment. I hereby invoke my Weingarten rights and request that a union representative be present for this meeting.
  - DK notes that university harassment policy prohibits the disruption and harassment. DK stated his view that the actions taken by the Office of Student Conduct are perpetuating and furthering harassment against him.
    - **Section 102.07: (Violations of University Policy) [in reference to UCLA Regulations on Activities, Registered Campus Organizations, and Use of Properties with respect**

10/12/2026

to interfering with free flow of pedestrian traffic]: DK did not accept responsibility for a violation of the UCLA Student Conduct Code.

- Dean Murotake reviewed next steps in the Student Conduct process and possible outcomes with DK.
- Dean Murotake reviewed the appeals process with the student (DS cases and above can appeal)
- Dean Murotake informed DK about the OSC's record retention policy.
- Dean Murotake reviewed grade determination with the student (For Academic cases)
- Dean Murotake asked DK if they had any additional questions regarding anything shared during the meeting.

10/12/2026





From: Murotake, Bryan
To: Dylan Kupsh
Subject: RE: Following Up
Date: Monday, March 31, 2025 9:57:00 AM
Attachments: Meeting Notes with Dylan Kupsh on 3.5.25.docx

Hello Dylan,

I apologize for the delay response.

Attached, please find your notes from our meeting on March 5, 2025. [redacted]

Regarding the notes, if you wish to provide any edits or revisions, please edit the attached Word document and forward it back to me with your edits and revisions so we are keeping the notes consistent.

To address some of your concerns that you raised during our meeting, I was able to consult with my team on next steps.

During our meeting, you raised the fact that UCLA Policy 850 was not in place during the time of the June 10, 2024 incident. [redacted]. Thus, you will receive an updated Notice Letter for the June 10, 2024 incident, which will reflect the correct policy, which is covered under UCLA Regulations on Use of Properties dated September 25, 2017.

[redacted]

Additionally, you addressed your concerns regarding the documents in your student conduct file. Regarding your conduct file, to this specific matter, the documents you have been provided are all the documents I have in my possession. If you believe there are additional documents that are not being made available to you, I would encourage you to continue submitting your public records request.

Please let me know if I missed any points you raised that I did not answer in this email.

I appreciate your patience in this matter.

Best,

Bryan Murotake
Assistant Dean of Students
Office of Student Conduct | Office of the Dean of Students
University of California, Los Angeles
1104 Murphy Hall | Los Angeles, CA 90095-1415
main: 310-825-3871 | fax: 310.825.8616
email: bmurotake@saonet.ucla.edu
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-----Original Message-----
From: Dylan Kupsh <dkupsh@ucla.edu>
Sent: Thursday, March 27, 2025 12:22 PM

EXHIBIT H

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OFFICE OF THE DEAN OF STUDENTS
1104 MURPHY HALL
BOX 951415
LOS ANGELES, CA 90095-1405

April 28, 2025

CONFIDENTIAL

Dylan Kupsh
dkupsh@ucla.edu
Log Number: 01917-001-2025 [Amended to Reflect Correct Policy and Incident]

Dear Dylan:

The Office of Student Conduct has received information indicating that you may have been involved in an incident which violates University regulations regarding student conduct.

Specifically, it has been reported that on or around November 19, 2024, near Bruin Walk, Ackerman Union, and the Student Activities Center, you participated in a human blockade that blocked all east and westbound pedestrian traffic on Bruin Walk.

If this allegation is true, your behavior is in violation of Section 102.07 (Violations of University Policy) [in reference to Time, Place and Manner, with respect to blocking pedestrian access) of the *UCLA Student Conduct Code*, and may affect your student status.

It is important to familiarize yourself with the *Code*. Specifically, you may wish to refer to Section III of the *Code*, entitled Student Conduct Procedures. The *UCLA Student Conduct Code* may be accessed on the Internet at www.deanofstudents.ucla.edu. To learn more about resources and support that is available to you, please click here.

Your Right to an Advisor
You have the right to select an Advisor of your choice or request the campus to provide an Advisor to you. You may also elect to proceed without an Advisor. Please review the attached "Advisor Authorization Form" about the role of an Advisor.

Option 1: No Selection of an Advisor
If you elect to not have an Advisor join you at your meeting, please visit the Appointment Scheduler on or before February 13, 2025, and schedule an appointment with me. During our meeting, you will be given the opportunity to explain this situation from your perspective. Please contact the Office of Student Conduct at (310) 825-3871 should you experience an issue with scheduling an appointment.

Option 2: Selecting an Advisor of your choice
If you choose to select your own Advisor, please complete the "Student Conduct Advisor Authorization Form" and submit the completed form to me at bmurotake@saonet.ucla.edu at least two business days prior to your scheduled meeting.

Visit the Appointment Scheduler to set up a meeting with me. Your selected Advisor will receive written training materials by email prior to your scheduled meeting. Please note that if you do not timely submit a completed "Student Conduct Advisor Authorization Form" prior to the scheduled meeting, the Advisor will not be permitted to join the meeting, and this may result in postponement of the meeting.

Option 3: Request an Advisor to be Provided

If you choose to have the campus provide you with an Advisor, please contact the Office of the Dean of Students at (310) 825-3871 to schedule an appointment with me, specifying that you are requesting a campus-provided Advisor to join you for this meeting. Please note that a meeting scheduled in this way may reflect a 5 - 10 business day window after the date of scheduling. The Office of the Dean of Students will inform you of the Advisor who has been appointed to assist you; and you will need to complete the "Student Conduct Advisor Authorization Form" for the appointed Advisor and submit the completed form to me at bmurotake@saonet.ucla.edu prior to your scheduled meeting. Please note that if you do not timely submit a completed "Student Conduct Advisor Authorization Form" prior to the scheduled meeting, the Advisor will not be permitted to join the meeting, and this may result in postponement of the meeting.

Please be advised that no degree may be conferred until any pending allegations and any assigned sanctions and conditions have been completed. Additionally, if you fail to schedule an appointment by **February 13, 2025**, or miss your scheduled appointment, a hold will be placed on your student records and registration. This hold will prevent you from registering in subsequent academic terms, graduating, or from obtaining transcripts, records or grades from the Office of the Registrar. It will also prohibit access to the Wooden Center and limit your use of library services.

Sincerely,

Bryan Murotake

Bryan Murotake
Assistant Dean of Students

CC: Estrella Arciba, Assistant Dean of Academic & Postdoctoral Services

10/12/2024

EXHIBIT I

10/12/2026

UNIVERSITY OF CALIFORNIA, LOS ANGELES **UCLA**

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OFFICE OF STUDENT CONDUCT
1104 MURPHY HALL
BOX 951415
LOS ANGELES, CA 90095-1405

June 20, 2025

CONFIDENTIAL
Dylan Kupsh
dkupsh@ucla.edu
Log# 01917-001-2025

Dear Dylan,

Pursuant to section III. E. 3. of the UCLA Student Conduct Code, this is notice that your case has been referred to the Student Conduct Committee for a hearing. This case is concerning the allegation that you have been involved in behavior which violates Student Conduct Code Section(s): 102.07 (Violations of University Policy) [in reference to Time, Place, and Manner, with respect to blocking pedestrian access]. Specifically, it has been reported that on or around November 19, 2024, near Bruin Walk, Ackerman Union, and the Student Activities Center, you participated in a human blockade that blocked all east and westbound pedestrian traffic on Bruin Walk.

You will be contacted by the Hearing Coordinator for further information concerning the hearing process. The Hearing Coordinator can be reached by telephone at (310) 825-3871 or via email at hearings@saonet.ucla.edu. A complete packet including a copy of all documents forwarded to the Student Conduct Committee will be made available for you.

Please note that section III. K. 10. of the Code provides for continuing resolution of this matter. If you wish to make an appointment to discuss this matter at any time before the Committee Chair (or the Hearing Officer) submits a report to the Vice Chancellor of Student Affairs, you may do so by contacting me at (310) 825-3871.

Sincerely,

Bryan Murotake

Bryan Murotake
Assistant Dean of Students

cc: Hearing Coordinator, Office of the Dean of Students
Estrella Arciba, Assistant Dean of Academic & Postdoctoral Services

10/12/2026

EXHIBIT J

10/12/2026

I would also like to state that the hearing packet provided contains incorrect information. Firstly, the notes seem to violate the protocol and agreement that we established regarding notes. It adds additional information, that wasn't mutually approved and I don't remember taking place in the meeting. Additionally, it contains redactions that are superfluous and not consistent.

I would also like to note that the hearing packet doesn't contain original violation email, and instead contains an email altered at a later date.

Dylan

> On Jun 20, 2025, at 3:19 PM, Murotake, Bryan <bmurotake@saonet.ucla.edu> wrote:
>
> Hi Dylan,
>
> If you believe this to be a FERPA violation, I would encourage you to submit a FERPA grievance by emailinggrievance@saonet.ucla.edu.
>
> I am reaffirming that I have not shared any of your confidential information with any other third party.
>
> Bryan Murotake
> Assistant Dean of Students
> Office of Student Conduct | Office of the Dean of Students
> University of California, Los Angeles
> 1104 Murphy Hall | Los Angeles, CA 90095-1415
> main: 310-825-3871 | fax: 310.825.8616
> email: bmurotake@saonet.ucla.edu
>
> **Confidentiality Notice:** The information (including any attachments) contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. If the reader of this message is not the intended recipient or an agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error and that any review, disclosure, dissemination, distribution, or copying of this message is strictly prohibited. **If you have received this communication in error, please notify me immediately by e-mail, and delete the original message.**
>
> ---
>
> **From:** Dylan Kupsh <dkupsh@ucla.edu>
> **Sent:** Friday, June 20, 2025 3:04 PM
> **To:** Murotake, Bryan <bmurotake@saonet.ucla.edu>
> **Cc:** Nieves, Benito <bnieves@saonet.ucla.edu>
> **Subject:** Re: Following Up
>
> Dear Bryan,
>
> Your errored email violated FERPA, revealing identifying information about another individual, presumably a student, that is undergoing a student conduct hearing. I believe this to be a serious violation of confidentiality that you stated is present in the student conduct process.
>
> With this breach of FERPA for another student, I'm placed in serious concern surrounding the promises that you made during our first meeting to "seek explicit permission before any information surrounding his [Dylan's] student conduct case was shared with UCLA Administration[, University Official], or US Congress." I would like for a reaffirmation, that this is still the case and that you have not shared my confidential information, as you did for Hannah.
>
> Dylan
>
> > On Jun 20, 2025, at 2:43 PM, Murotake, Bryan <bmurotake@saonet.ucla.edu> wrote:
> >
> > Hi Dylan,
> >
> > This was an error on my end.
> >
> > I had begun to draft your email on a draft email that was opened. As you can see from the email, your information was not forwarded or shared with any other third party.
> >
> > I apologize for the mistake.
> >
> > I am providing the correct version of the email here:
> >
> > Hello Dylan,
> >
> > Per the UCLA Student Conduct Code: Part III, Section E: a case may be referred to the UCLA Student Conduct Committee when a student does not acknowledge responsibility for a violation of the UCLA Student Conduct Code, but the Dean concludes from Dean concludes from the available information that the Student Conduct Committee may find that it is more likely than not that a violation of the UCLA Student Conduct Code occurred.
> >
> > Given that you have not accepted responsibility for the June 2024 incident, your case will be referred to

10/17/2025

the Student Conduct Committee for a hearing.

Further, given that you neither accepted or denied responsibility for the November 2024 incident, your case will be referred to the Student Conduct Committee for a hearing.

Please do note, that per the UCLA Student Conduct Code: Part III, Section K Number 11: Until the Student Conduct Committee makes its report to the Dean of Students, the accused Student may make an admission of responsibility to the Dean assigned to the case. This disposition of the matter will bind all parties and terminate all proceedings.

You will receive an official notification letter of this referral to the Student Conduct Committee, and then you will be contacted by the Hearing Coordinator. I am providing you with information about the hearing process in writing. If you would like to discuss this process and any questions you have via Zoom, please let me know and we can definitely schedule time to meet.

Hearing Procedure Information:

You will be contacted by the Hearing Coordinator to facilitate scheduling of the hearing. The Hearing Coordinator typically will schedule around any classes that you are enrolled in, but may also consider other requests for scheduling accommodation. Your hearing will be administered remotely via Zoom. You will receive a hearing packet, which includes the information gathered as part of my review. This packet will also be provided to the Student Conduct Committee. Any additional information that you want to submit can be provided to me directly for inclusion in the hearing packet, or provided to the Hearing Coordinator if this information becomes available after the hearing packet has been created.

The Student Conduct Committee is a body composed of University students, staff, and faculty who have been appointed and trained to review information and make a finding whether it is more likely than not that there was a violation of the UCLA Student Conduct Code.

During the hearing, I will provide an overview of the information gathered in the case. The Committee may ask me questions, and if you have any questions you wish to be presented, those would be submitted to the Committee in writing to review before asking. Once all questions of me have been asked, I would be excused.

Any witnesses that I spoke with or contacted during the course of my review would be invited to participate in the hearing. Each participating witness would be called in one at a time to share the information they have about the incident under review, and then asked questions by the process described above.

Once all witnesses have been interviewed, you would proceed with your presentation. Once you have presented information, then the Committee may ask you questions. If you choose not to speak during the hearing, no inferences can be drawn as a direct result of that silence. The hearing will end when your presentation is complete and the Committee has asked their questions. The Committee would then deliberate in a closed session in making their finding whether there is sufficient information to indicate that you engaged in a violation of the Code. You will receive a hearing report with a summary of their findings within 10 business days of the hearing. If the Committee makes a finding of responsibility regarding violation of the Code, I would issue a recommended sanction based on those findings. You would then have an opportunity to submit a response to the hearing report within five business days on the basis that 1) you believe there was a procedural error that significantly impacted the findings, 2) new information that could not have been known at the time of the hearing that significantly impacted the findings, or 3) the recommended sanction is disproportionate to the severity of the violation. The Vice Chancellor of Student Affairs would then have 15 business days to issue a final decision.

You may be assisted by an Advocate, who is a University student, staff, or faculty member that can assist with organizing your presentation and brainstorming questions for witnesses. You may designate an Advocate of your choosing or request a Volunteer Advocate from the pool overseen by the Hearing Coordinator. The use of an Advocate is optional. You may also have up to two support persons present at the hearing. Those support persons would not have a role in the hearing and may not address the hearing participants—however, they could communicate directly with you.

Please let me know if you have any questions regarding this matter.

Again, my apologies for the mistake.

Bryan Murotake
Assistant Dean of Students
Office of Student Conduct | Office of the Dean of Students
University of California, Los Angeles
1104 Murphy Hall | Los Angeles, CA 90095-1415
main: 310-825-3871 | fax: 310.825.8616
email: bmurotake@saonet.ucla.edu

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10/12/2025

From: Dylan Kupsh <dkupsh@ucla.edu>
Sent: Friday, June 20, 2025 12:00 PM
To: Murotake, Bryan <bmurotake@saonet.ucla.edu>
Cc: Nieves, Benito <bnieves@saonet.ucla.edu>
Subject: Re: Following Up

Dear Bryan,

Are you able to inform me of who "Hannah" is and why are you sending them information corresponding to my student conduct case?

Dylan

On Jun 20, 2025, at 10:21 AM, Murotake, Bryan <bmurotake@saonet.ucla.edu> wrote:

Hello Dylan,

Hello Hannah,

Per the UCLA Student Conduct Code: Part III, Section E: a case may be referred to the UCLA Student Conduct Committee when a student does not acknowledge responsibility for a violation of the UCLA Student Conduct Code, but the Dean concludes from Dean concludes from the available information that the Student Conduct Committee may find that it is more likely than not that a violation of the UCLA Student Conduct Code occurred.

[redacted]

Further, given that you neither accepted or denied responsibility for the November 2024 incident, your case will be referred to the Student Conduct Committee for a hearing.

Please do note, that per the UCLA Student Conduct Code: Part III, Section K Number 11: Until the Student Conduct Committee makes its report to the Dean of Students, the accused Student may make an admission of responsibility to the Dean assigned to the case. This disposition of the matter will bind all parties and terminate all proceedings.

You will receive an official notification letter of this referral to the Student Conduct Committee, and then you will be contacted by the Hearing Coordinator. I am providing you with information about the hearing process in writing. If you would like to discuss this process and any questions you have via Zoom, please let me know and we can definitely schedule time to meet.

Hearing Procedure Information:

You will be contacted by the Hearing Coordinator to facilitate scheduling of the hearing. The Hearing Coordinator typically will schedule around any classes that you are enrolled in, but may also consider other requests for scheduling accommodation. Your hearing will be administered remotely via Zoom.
You will receive a hearing packet, which includes the information gathered as part of my review. This packet will also be provided to the Student Conduct Committee. Any additional information that you want to submit can be provided to me directly for inclusion in the hearing packet, or provided to the Hearing Coordinator if this information becomes available after the hearing packet has been created.

The Student Conduct Committee is a body composed of University students, staff, and faculty who have been appointed and trained to review information and make a finding whether it is more likely than not that there was a violation of the UCLA Student Conduct Code.

During the hearing, I will provide an overview of the information gathered in the case. The Committee may ask me questions, and if you have any questions you wish to be presented, those would be submitted to the Committee in writing to review before asking. Once all questions of me have been asked, I would be excused.

Any witnesses that I spoke with or contacted during the course of my review would be invited to participate in the hearing. Each participating witness would be called in one at a time to share the information they have about the incident under review, and then asked questions by the process described above.

Once all witnesses have been interviewed, you would proceed with your presentation. Once you have presented information, then the Committee may ask you questions. If you choose not to speak during the hearing, no inferences can be drawn as a direct result of that silence. The hearing will end when your presentation is complete and the Committee has asked their questions. The Committee would then deliberate in a closed session in making their finding whether there is sufficient information to indicate that you engaged in a violation of the Code. You will receive a hearing report with a summary of their findings

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within 10 business days of the hearing. If the Committee makes a finding of responsibility regarding violation of the Code, I would issue a recommended sanction based on those findings. You would then have an opportunity to submit a response to the hearing report within five business days on the basis that 1) you believe there was a procedural error that significantly impacted the findings, 2) new information that could not have been known at the time of the hearing that significantly impacted the findings, or 3) the recommended sanction is disproportionate to the severity of the violation. The Vice Chancellor of Student Affairs would then have 15 business days to issue a final decision.

You may be assisted by an Advocate, who is a University student, staff, or faculty member that can assist with organizing your presentation and brainstorming questions for witnesses. You may designate an Advocate of your choosing or request a Volunteer Advocate from the pool overseen by the Hearing Coordinator. The use of an Advocate is optional. You may also have up to two support persons present at the hearing. Those support persons would not have a role in the hearing and may not address the hearing participants—however, they could communicate directly with you.

Please let me know if you have any questions regarding this matter.

Bryan Murotake
Assistant Dean of Students
Office of Student Conduct | Office of the Dean of Students
University of California, Los Angeles
1104 Murphy Hall | Los Angeles, CA 90095-1415
main: 310-825-3871 | fax: 310.825.8616
email: bmurotake@saonet.ucla.edu

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From: Murotake, Bryan
Sent: Wednesday, June 11, 2025 6:27 PM
To: Dylan Kupsh <dkupsh@ucla.edu>
Subject: RE: Following Up

Hi Dylan,

Friday June 13, 2025, at 2:00pm works for me. Providing a zoom link here: https://ucla.zoom.us/j/93179092317?pwd=0N1z0ewKDYDLt2EXkFCpPs8gn5l7Zh.1.

Please note, during this meeting we will be reviewing the videos from the June 2024 incident and discussing the November 2024 incident. If you would like to discuss your most recent matter, you will need to schedule a subsequent meeting.

Best,

Bryan Murotake
Assistant Dean of Students
Office of Student Conduct | Office of the Dean of Students
University of California, Los Angeles
1104 Murphy Hall | Los Angeles, CA 90095-1415
main: 310-825-3871 | fax: 310.825.8616
email: bmurotake@saonet.ucla.edu

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From: Dylan Kupsh <dkupsh@ucla.edu>
Sent: Monday, June 9, 2025 7:01 PM
To: Murotake, Bryan <bmurotake@saonet.ucla.edu>
Subject: Re: Following Up

Hello,

Let's do Friday, June 13 at 2:00pm.

Dylan

9/15/25, 2:31 PM

EXHIBIT K

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UNIVERSITY OF CALIFORNIA, LOS ANGELES

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OFFICE OF THE DEAN OF STUDENTS
1104 MURPHY HALL
BOX 951415
LOS ANGELES, CA 90095-1405

[Updated Date] April 6, 2026

April 28, 2025

CONFIDENTIAL

Dylan Kupsh
dkupsh@ucla.edu
Log Number: 01917-001-2025

[Amended Notice Letter sent on April 6, 2026, by Interim Director and Associate Dean of Students, Benito Nieves, to include new allegation information and Prohibited Behavior Sections.]

Dear Dylan:

The Office of Student Conduct has received information indicating that you may have been involved in an incident which violates University regulations regarding student conduct.

Specifically, it has been reported that on or around November 19, 2024, near Bruin Walk and during an unauthorized event, you participated in public expression activity in a manner that was not in compliance with University policy; specifically, it is alleged you participated in creating a human blockade that blocked all east and westbound pedestrian traffic on Bruin Walk. It is additionally reported that you blocked an individual from moving through bushes by physically positioning yourself in front of the individual and mirroring their movements for the purpose of preventing the individual to get by. It is additionally reported that when instructed by a University official to either relocate or allow others to get by you, you did not comply with the instruction. It is additionally reported that you may have organized the unauthorized event.

If this allegation is true, your behavior is in violation of Section 102.16 (Failure to Comply) and Section 102.07 (Violation of University Policy), of the *UCLA Student Conduct Code;* specifically, *UCLA Interim Policy 850: General Use of UCLA Property*, *UCLA Interim Policy 852: Public Expression Activities*, *UCLA Interim Policy 860: Organized Events*, and may affect your student status.

It is important to familiarize yourself with the *Code*. Specifically, you may wish to refer to Section III of the *Code*, entitled Student Conduct Procedures. The *UCLA Student Conduct Code* may be accessed on the Internet at www.deanofstudents.ucla.edu. To learn more about resources and support that is available to you, please click here.

Your Right to an Advisor
You have the right to select an Advisor of your choice or request the campus to provide an Advisor to you. You may also

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elect to proceed without an Advisor. Please review the attached "Advisor Authorization Form" about the role of an Advisor.

Option 1: No Selection of an Advisor

If you elect to not have an Advisor join you at your meeting, please visit the Appointment Scheduler on or before February 13, 2025, and schedule an appointment with me. During our meeting, you will be given the opportunity to explain this situation from your perspective. Please contact the Office of Student Conduct at (310) 825-3871 should you experience an issue with scheduling an appointment.

Option 2: Selecting an Advisor of your choice

If you choose to select your own Advisor, please complete the "Student Conduct Advisor Authorization Form" and submit the completed form to me at bmurotake@saonet.ucla.edu at least two business days prior to your scheduled meeting. Visit the Appointment Scheduler to set up a meeting with me. Your selected Advisor will receive written training materials by email prior to your scheduled meeting. Please note that if you do not timely submit a completed "Student Conduct Advisor Authorization Form" prior to the scheduled meeting, the Advisor will not be permitted to join the meeting, and this may result in postponement of the meeting.

Option 3: Request an Advisor to be Provided

If you choose to have the campus provide you with an Advisor, please contact the Office of the Dean of Students at (310) 825-3871 to schedule an appointment with me, specifying that you are requesting a campus-provided Advisor to join you for this meeting. Please note that a meeting scheduled in this way may reflect a 5 - 10 business day window after the date of scheduling. The Office of the Dean of Students will inform you of the Advisor who has been appointed to assist you; and you will need to complete the "Student Conduct Advisor Authorization Form" for the appointed Advisor and submit the completed form to me at bmurotake@saonet.ucla.edu prior to your scheduled meeting. Please note that if you do not timely submit a completed "Student Conduct Advisor Authorization Form" prior to the scheduled meeting, the Advisor will not be permitted to join the meeting, and this may result in postponement of the meeting.

Please be advised that no degree may be conferred until any pending allegations and any assigned sanctions and conditions have been completed. Additionally, if you fail to schedule an appointment by **February 13, 2025**, or miss your scheduled appointment, a hold will be placed on your student records and registration. This hold will prevent you from registering in subsequent academic terms, graduating, or from obtaining transcripts, records or grades from the Office of the Registrar. It will also prohibit access to the Wooden Center and limit your use of library services.

Sincerely,

*Interim Director and Associate Dean of Students, Benito Nieves, sent the updated Notice on April 6, 2026. The original Notice was sent by:

Bryan Murotake

Bryan Murotake
(former) Assistant Dean of Students

CC: Estrella Arciba, Assistant Dean of Academic & Postdoctoral Services

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EXHIBIT L

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individual (who had a scooter) turned away from the line of protestors and walked back eastbound up Bruin Walk.

At approximately 1:36pm, Mr. Kupsh, still standing directly behind the line of protestors and facing east, shifted the green sign about two feet to his left in front of two female individuals who had walked up to the rear of the line of protestors. The two individuals appeared to speak with Mr. Kupsh and were observed to remain behind the line of protestors. At approximately 1:37pm, Mr. Kupsh is observed to move toward the south end of the line of protestors blocking Bruin Walk.

Per UCPD reports, at approximately 1:48pm, a UCPD lieutenant and another officer spoke with Mr. Kupsh, UCLA professor Graeme Blair, and another unidentified individual. The lieutenant advised Mr. Kupsh that the blockade was unlawful, that the blockade needed to disperse, and that the group could continue their peaceful protest with other protestors who were in Bruin Plaza. Mr. Kupsh stated that he was not an event organizer, but he could relay the lieutenant's message to members of the blockade. Mr. Kupsh was observed to walk over to the blockade, but no change in behavior was observed.

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EXHIBIT M

10/12/2026

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OFFICE OF THE DEAN OF STUDENTS
1104 MURPHY HALL
BOX 951415
LOS ANGELES, CA 90095-1405

June 15, 2026

CONFIDENTIAL
Dylan Kupsh
dkupsh@ucla.edu
Log No. 01917-001-2025

Dear Dylan,

As prescribed in Section III.K.13 of the UCLA Student Conduct Code (*Code*), I have carefully reviewed the report from the Student Conduct Committee Hearing Panel (Panel) involving allegations that you violated the *Code* with respect to Section 102.16 (Failure to Comply) and 102.07 (Violations of University Policy) specifically, Section IV.A of the *UCLA Interim Policy 850: General Use of UCLA Property*, Section IV. of the *UCLA Interim Policy 852: Public Expression Activities*, and Section III. of the *UCLA Interim Policy 860: Organized Events*, during the Fall 2024 Quarter.

After careful consideration, I am upholding the Panel's findings that there is Insufficient Information to find you responsible for a violation of the UCLA Student Conduct Code with regard to Section 102.16 (Failure to Comply), and Section 102.07 (Violations of University Policy), specifically, Section III. of the *UCLA Interim Policy 860: Organized Events* (with respect to an Event Organizer complying with the specific requirements and scheduling procedures of the Campus Venue Scheduler).

I am also upholding the findings of the Panel related to the allegations that you violated Section 102.07 (Violations of University Policy) of the UCLA Student Conduct Code, specifically, Section IV.A of the *UCLA Interim Policy 850: General Use of UCLA Property* (with respect to interfering with the free flow of campus traffic), and Section IV. of the *UCLA Interim Policy 852: Public Expression Activities* (with respect to impeding foot traffic). Specifically, the Panel determined that you engaged in the interference of the free flow of campus traffic, and that you impeded foot traffic. I have approved the recommended sanction, and you will be placed on a Suspension for two Quarters: Summer 2026 Quarter and Fall 2026 Quarter (June 22, 2026 – December 11, 2026).

Suspension is the termination of UCLA student status for a specified academic term or terms. You are ineligible to enroll in UCLA Extension concurrent courses during the period of Suspension. You may not transfer or register for courses at another campus or location of the University of California during the period of Suspension. You are considered not in good conduct standing for the duration of the Suspension period. Further violations of the UCLA Student Conduct Code or failure to complete any assigned conditions may result in additional disciplinary action including, but not limited to, an additional Suspension period, or Dismissal.

Graduate students who are suspended are required to apply for readmission and are held to any changes in degree program requirements.

Following the lifting of this suspension, if you wish to resume graduate study at UCLA you must apply for readmission through the Division of Graduate Education's online application. It is your responsibility to meet the published deadline for submitting all of the required components of the application process to the Division and to the department. You should understand that readmission is not guaranteed and that the decision on the application will be made by departmental

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faculty based on their judgment of your academic record, the number of graduate student slots available, and your competitiveness with current applicants.

The condition of your Suspension for the Summer 2026 and the Fall 2026 Quarters (June 22, 2026 – December 11, 2026) from the Office of Student Conduct, with the deadlines, is as follows:

Meeting with the Office of Student Conduct: You must schedule and attend a follow-up meeting with Interim Director of the Office of Student Conduct, and Associate Dean of Students Benito Nieves, by **October 9, 2026**. The purpose of this meeting is to determine if you have questions or need referral information for University personnel or departments, and to discuss related inquiries that you may have once your suspension period has concluded (ex: holds, transcript notations, recordkeeping etc.). Please call 310-825-3871 or email bnieves@saonet.ucla.edu to schedule a meeting.

If you have any questions, please contact Interim Director of the Office of Student Conduct, and Associate Dean of Students Benito Nieves (bnieves@saonet.ucla.edu).

Further violations of the Code, or failure to complete the above condition may result in additional disciplinary action, including but not limited to, suspension or dismissal. You may also receive holds on your student account. A hold may prevent you from registering in subsequent academic terms; from obtaining transcripts, records or grades from the Office of the Registrar; or from receiving a degree or diploma from the University. A Hold also will limit your use of library services and prohibit access to the Wooden Center. Additionally, your status as a student in our community may be jeopardized.

Should you decide to appeal this decision, you have five days from the date of this letter to do so. You must submit your appeal in writing to the Vice Chancellor for Student Affairs. You may email your appeal to hearings@saonet.ucla.edu or deliver it by hand to 1104 Murphy Hall. Please refer to Section III.K.14 of the Student Conduct Code for more information regarding the appeal process.

The disciplinary action will remain in your file in accordance with Section V. of the *Code.* At the close of the retention period, and provided you have no further disciplinary action, the file will then be destroyed.

Students are expected to adhere to the *Code* at all times. However, the Panel determined that a violation occurred in this case. I trust that you have learned from this situation, and that you will make every effort to uphold University policy for the remainder of your UCLA experience.

Sincerely,

Jasmine JS Rush
Dean of Students

cc: Benito Nieves, Associate Dean of Students
Emma Tracewell, Program Coordinator
Estrella Arciba, Assistant Dean, Office of Academic and Postdoctoral Services

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EXHIBIT N

10/12/2026

July 13, 2026

Michael Gorden
Vice Chancellor of Student Affairs
mgorden@saonet.ucla.edu

Alex Dring
Hearing Administrator
hearings@sao.ucla.edu

Sent via electronic mail

Re: Appeal of Findings of Violation and Multi-Term Suspension of Student Dylan Kupsh (Case No. 01917-001-2025)

Dear Vice Chancellor Gorden,

I am writing to respectfully appeal the finding of responsibility and sanction in Student Conduct Case No. 01917-001-2025 issued on June 15, 2026. The Dean of Students proposed a two quarter suspension, for the Summer and Fall 2026 quarters, following the hearing panel found me responsible for violating the 2021 UCLA Student Conduct Code Section 102.07 (Violations of University Policy) specifically, Section IV.A. of the UCLA Interim Policy 850: General Use of UCLA Property [with respect to interfering with the free flow of campus traffic], Section IV. of the UCLA Interim Policy 852: Public Expression Activities [with respect to impeding foot traffic].

I request that you overturn the findings of responsibility and imposed sanctions on the following grounds: 1) the hearing was not conducted in accordance with the UCLA Student Conduct Code or UC Policy, and resulted in procedural errors that impacted the findings and sanctions, and 2) the two-quarter suspension sanction assigned is substantially disproportionate to the severity of the violation.

1. Procedural Violations Substantially Impacted the Findings and Sanctions

Due to the procedural deficiencies detailed below, you must overturn the Dean of Students' decision affirming the panel's finding of a violation, and find that there is insufficient evidence to support this conclusion. In the alternative, you must remand my case for a new hearing where such violations are corrected.

a) The Unequal Enforcement of UCLA Policy Violates My Right to Free Expression and Due Notice

The student conduct panel held me responsible for "interfering with the free flow of campus traffic" and "impeding foot traffic." Yet, longstanding campus traditions on East Bruinwalk have historically allowed this behavior, and it continues today.

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East Bruinwalk, specifically, has a decades-long historical practice of leafleting or flyering. Within a 2026 Daily Bruin opinion column, East Bruinwalk was described as "a swarm of bodies is blocking your way, begging for attention" and filled with "aggressive" student clubs and organizations "badgering" passerbys. Within a Reddit thread, individuals describe strategies of avoiding East Bruinwalk due to the aggressive flyering ["just take the bike path to avoid them"]. East Bruinwalk is described as especially hectic within election season. All this described behavior directly "impedes" or "interferes" with pedestrian traffic on East Bruinwalk.

According to the column, the university has taken no action against these individuals or engaged within extensive outreach to prohibit this behavior, thereby implicitly condoning even "aggressive" "badgering" on East Bruinwalk. Yet, I was found responsible for allegedly "interfering with the free flow of campus traffic" for standing or pacing along East Bruinwalk, even though this is well-within the norms of acceptable behavior on East Bruinwalk.

Furthermore, because the campus has not engaged in efforts to curtail or prohibit the badgering and other obstructive behavior that regularly occurs on East Bruinwalk, there was no reason for me to know that my behavior – simply standing in one place – was a potential violation of campus policy. Thus, by choosing to enforce the Student Conduct Code against me while failing to enforce behavior regularly occurring on East Bruinwalk, the Panel violated my right to notice and fair process.

b) **Prosecution based upon Vague and Overbroad Language Violated my Right to Due Process**

The panel's decision held me responsible for "interfering with the free flow of campus traffic" and "impeding foot traffic." The terms of these policies, however, are undefined, and the student conduct office never provided definitions during the hearing. These policies are too vague and overbroad to be enforceable.

By definition, standing in a walkway is "interfering" or "impeding" pedestrian foot-traffic, as it is occupying space that individuals would have to navigate around in order to continue walking through a campus walkway. Yet, standing within East Bruinwalk is a constitutional right and not in violation of campus or student conduct policy.

East Bruinwalk is approximately 100 feet across. This fact was not disputed by Dean Nieves during the hearing. The student conduct's evidence presented during the hearing showed that I took, at most, 1 to 6 feet of horizontal space. Both the Office of Student Conduct and the Panel found that I never interlinked arms with other individuals. I'm alleged to be positioned "standing several feet behind" the line of interlinked protesters. Thus, East Bruinwalk would have had 94 feet of free space.

The policy language alleged to have been violated was newly added to the Time, Place, and Manner Policy. Previous TPM policy language was limited to regulating ingress and egress to campus buildings and interference with street traffic. To avoid constitutional vagueness issues,

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other similarly situated policies define additional required terms for enforcement, including "willful", "malicious", and "substantial". California Penal Code 647c uses "willfully" and "maliciously." San Francisco Police Municipal Code Section 22 requires "willfully" and "substantially." To explicitly avoid constitutionality problems, these statutes also frequently contain explicit exemptions for free-expression activities [see SFPMC Sec 22 or Maryland Regulation 14.25.02.03].

To assist within the enforcement of the policies listed above and avoid vagueness, key-terms within these policies are defined. For instance, the San Francisco Police Department General Order 6.11 provides key definitions to assist in the enforcement of these terms, as to not infringe upon constitutionality. Importantly, this definition includes the following caveat "Causing a slight deviation in a pedestrian's path does not necessarily constitute an illegal obstruction, nor does the mere presence of a person on a sidewalk."

By contrast, the Office of Student Conduct, or UCLA Policy, doesn't provide definitions surrounding "interfering" nor "impeding." By not providing these definitions, the policy is unclear, as reasonable individuals can interpret these words differently. For example, is it "interference" if people on the walkway have slight path deviations because someone is standing in it? Does an individual stepping in front of another individual for a fraction of a second, adjusting another individual's walking patterns, cause "obstruction"? UCLA does not provide enough definition around what constitutes interfering or impeding for a reasonable student to understand what compliance requires.

Because the University provided no definitions or limiting principles of what constitutes "interfering" and "impeding" under the Interim University Policies I was found in violation of, this policy is too vague to be enforced. *See e.g*, *Soglin v. Kauffman*, 418 F.2d 163, 168 (7th Cir. 1969) (Finding that a university campus' administrative prosecution of a student for a violation of "misconduct" was too vague to be enforced because the campus' use of "misconduct" as a standard for discipline contained "no clues which could assist a student, an administrator or a reviewing judge in determining whether conduct not transgressing statutes is susceptible to punishment by the University as 'misconduct.'"; *Marin v. Univ. of P.R.*, 377 F. Supp. 613, 626 (D.P.R. 1974) (Holding as "grossly overbroad" a public university's requirement that all demonstrations, meetings, and marches on campus require prior notification and consultation and approval of University administrators because they "sweep[ed] within their net both the perfectly harmless -- a single, silent protester holding a sign in the middle of the campus in mid-day -- and the extremely dangerous. Such broadside attacks on the rights of free expression are repugnant to our constitutional scheme.")

It also leaves open the possibility for student conduct panel members to construe constitutionally protected actions as prohibited behavior. In defining principles of free speech at public schools, the Supreme Court allows only "reasonable regulation of speech-connected activities in carefully restricted circumstances. But we do not confine the permissible exercise of First Amendment rights to a telephone booth or the four corners of a pamphlet, or to supervised and ordained discussion in a school classroom." (*Tinker v. Des Moines Indep. Cmty. Sch. Dist.*,

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393 U.S. 503, 513 (1969)). Under the principle, regulations on students' expression can only be imposed if it is shown or forecasted that students' activities would "materially and substantially disrupt the work and discipline of the school." (*Tinker,* 393 U.S. at 513).

Here, while I was present on East Bruinwalk and asked to liaise between those demonstrating, and campus administrators and police, the University and Dean Nieves did not allege – nor did the Panel find – that I disrupted any university activities or any complainants' work. The panel specifically observed that my "individual behavior did not constitute the interference of an individual being able to participate in an educational program." (Hearing report at 36). Rather, the only basis for the alleged interference or impeding to support the Panel's finding a violation was my "mirroring" of individuals' actions. Therefore, the panel's finding a violation implicates my First Amendment rights.

c) The Panel's Finding of a Violation for my Alleged Non-Response to Confrontation by Private Individuals Violates My Due Process Right to Notice

Individuals generally have a right to stand on university pathways or walkways. Flyering, or standing within the pathway and distributing literature to passersby, is a common practice within East Bruinwalk, specifically. By definition, individuals standing within the pathway are "impeding" or "obstructing" foot traffic. East Bruinwalk is approximately 100 feet across. This fact was not disputed by Dean Nieves during the hearing.

Within the hearing, I was shown to, at most, take from 1 to 6 feet of horizontal space. I never interlinked arms with other individuals [confirmed by Dean Nieves during hearing]. I'm alleged to be positioned "standing several feet behind" the line of interlinked protesters. Thus, East Bruinwalk had 94 feet of free space available for passerbys.

In general, private citizens have no legal duty to affirmatively react to or accommodate the perceived, unstated intentions of other individuals. See e.g. *Lugtu v. Cal. Highway Patrol*, 26 Cal. 4th 703, 716 (2001) (interpreting Cal. Civil Code Sec. 1714) ("[A] person ordinarily is obligated to exercise due care in his or her own actions so as not to create an unreasonable risk of injury to others, and this legal duty generally is owed to the class of persons who it is reasonably foreseeable may be injured as the result of the actor's conduct.) Here, there was no allegation or risk of injury. In addition, the student code of conduct and university policy create no separate institutional duty to accommodate the intentions of individuals confronting another person. In general, the student code of conduct only prosecutes individuals for their affirmative actions.

Yet, the panel's decision finds me responsible for simply not moving when confronted by another person. The basis for the panel's decision states only that, "Kupsh did not move himself or move the sign that Kupsh possessed to allow individuals walk around Kupsh when individuals approached Kupsh."

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The "individuals" and those requiring movements were not any university or institutional officials giving me directions, as the panel separately concluded that there "was Insufficient Information to determine that Kupsh failed to comply with instructions from University officials." Rather, they were private individuals, acting in their own capacity, who physically approached me while the surrounding space on East Bruinwalk remained accessible for those individuals.

Thus, this decision enshrines non-existent requirements within the Student Code of Conduct or university policy: that a student must take affirmative action in response to strangers' confrontation or cues.

Goss v. Lopez requires students to be given notice of their alleged conduct prior to the hearing (*Goss v. Lopez*, 419 U.S. 565 (1975)). By using unwritten and unstated policy requirements to infer responsibility, I was deprived of notice surrounding the university policy.

d) Fair Process Requires that a Good Faith Effort to Comply with Instructions and Norms of Conduct be Honored

The Student Conduct Code requires individuals to comply with the directions of a "Designated University Officials acting in the performance of one's duties." UCPD Officers are designated university officials and their orders during a public demonstration should be presumed to be in the "performance of their duties."

Within the conduct panel decision, it was recognized that "Kupsh complied with the instructions from Miller and UCPD regarding Kupsh being directed to inform individuals on Bruin Walk not to "block" the walkway." Thus, the conduct panel found it "credible" that UCPD gave an order to Kupsh to provide specific information to other individuals, and that this action was taken.

During the presentation, Student Witness 6 talked about their presence during the protest and stated that I complied with UCPD's directions. In the non-affiliate video (at timestamp 00:34), it shows me allegedly facing toward the demonstration, following direct orders from UCPD to communicate information. I'm then alleged to have been interrupted, when informing students of the order, by an individual. Dean Nieves states "Dylan initially has his back to this individual, turns around and appears to engage with him verbally." All these allegations show me making a good-faith effort to comply with UCPD's orders to relay messages from the police to demonstrators.

Yet, the Office of Student Conduct's prosecution was primarily based on my attempted compliance with UCPD's orders. Dean Nieves uses my continued presence near the demonstrators to communicate messages as evidence of "blocking" or "interfering" with pedestrian traffic. When asked on this UCPD order, Dean Nieves stated that the order to "go and ask students" was invalid, as he personally would not initiate a student conduct case over this order. Thus, Dean Nieves claims that I should have not followed this order from the police. However, to apply this understanding, I would have been required to understand Dean Nieves' personal reaction when determining whether to comply with university officials.

12/12/2025 16:41

There's a simultaneous prosecution, such that if I didn't comply with the order then it would be "failure to comply" (as seen within the Panel decision), while if I did follow instructions – as was the case here – the order results in "interfering with pedestrian movement" as I have to engage with individuals. This suggests at best a catch-22, and at worst, entrapment, within a process that is purported to provide me with "educational opportunities [to] encourage [me] to evaluate [my] own actions, consider [my] own decision making, and acquire new skills to improve [my] choices in the future." (2021 Student Conduct Code).

e) Lack of Cross-Examination of the Factual Inaccuracies within Mr. Miller's Statement

Under California law, a university fundamentally violates fair process when it isolates an accusing witness from meaningful cross-examination while simultaneously relying on that witness's statements to render a finding of guilt. *Teacher v. Cal. Western Sch. of Law*, 77 Cal. App. 5th 111, 136 (2022). University of California PACAOS-100 policy requires that a "student shall have the opportunity to… confront and cross-examine witnesses presented by the University."

However, here, the University relied on statements by Student Affairs Monitor Chett Miller to find me responsible for this violation, without giving me the opportunity to cross-examine and question Mr. Miller. In particular, Dean Nieves relied on notes from his interview with Mr. Miller prior to my hearing to allege that my actions violated the Student Conduct Code. Dean Nieves quotes the interview notes in his statement:

"Miller observed Dylan 'block at least one person.' Mr. Miller stated that Mr. Miller saw a male-identified 'student' attempt to get through bushes to get by the formed lines. Mr. Miller stated that Dylan 'move in such a way to obstruct' the individual."

Yet, Mr. Miller never attended my student conduct hearing. I was unable to exercise my right to cross-examine university witnesses that were relied upon when reaching a decision.

In addition, even assuming Dean Nieves, as a university official, had the authority to speak about the information known to another official, Dean Nieves declined to do so. When I asked a question about the factual scenario of Mr. Miller's statement, Dean Nieves refused to answer the question, claiming that it was "not part of the allegations." Yet, because the panel's decision is based on my alleged "mirroring" of another individuals' actions, as described by Mr. Miller in his interview, the lack of cross-examination substantially impacted the hearing decision.

Furthermore, the Panel declined to consider other statements – including one by the University's own witness, Director Hodgman – that refute Mr. Miller's statement. For example, in his presentation, Director Hodgman did not present any information that described the "male-identified student" that was trying to go through the bushes that was allegedly blocked by me. No video shows me blocking an individual attempting to traverse through the bushes.

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This statement contradicts the Hodgman report. Within the report, Mr. Miller is described as being on the east-side (Powell side) of the demonstration from the start at ~1:30 to crossing to the west-side (Hill side) of the demonstration at 1:34. I'm described as being on the east-side (Powell side) of the demonstration from the start at ~1:30 to 1:48. The UCPD report describes me as "walking back and forth in front of and behind" from 1:48 to 2:23. From 2:23 onward, UCPD is described as controlling access within East Bruinwalk.

The only realistic time period affiliated with Chett's statement, if true, would be between 1:30 to 1:48. From the 1:48 to 2:23pm interval, I am described as speaking to officers and acting upon their orders to relay messages. UCPD's report also shows him as "walking."

From 1:34 to 1:48, Mr. Miller would have been on the opposite side of the protest (Mr. Miller would be on the West side, I'm described to be on the East side), therefore, would have an obstructed view of my actions, making the statement unreliable, at-best. Thus, the best time placement for this statement is within the 1:30 to 1:34 interval. However, as mentioned, Hodgman's statement, and the video provided, don't support the allegation that a male-identifying individual traversing through bushes were blocked within this 1:30 to 1:34 interval. Thus, if Hodgman provides a full accounting of my movements and actions, then Mr. Miller's statement must have been falsely provided, unable to be placed either temporally or spatially within the described scene.

Dean Nieves stated that Mr. Miller's statement and Hodgman's testimony were "cooperating." However, when questioned, Nieves was unable to spatially or temporally place Chett's allegations within the Hodgman statement. Dean Nieves also stated that crossing the bushes "would have positioned Miller away from Dylan", therefore having the 1:34 to 1:48pm time frame out of the "accusations within the letter." When asked if Mr. Miller himself was blocked by myself, Dean Nieves states that the allegation was false ["I don't see him make a statement that he himself was blocked by Dylan in the bushes"]. When asked about Mr. Miller's positioning, Dean Nieves stated that he doesn't know where they were "proximity-wise." Questioning the temporal or spatial position of Mr. Miller's claim was then ruled irrelevant, as Nieves claimed it was "not part of the allegations." Mr. Miller's accusation was never able to be cross-examined, as they never attended the hearing.

f) Violations of Right to Fair Process by Reliance upon the Anonymous Instagram Video

The Student Conduct Office's prosecution relied upon an anonymous video, submitted by a non-affiliate possibly operating under a pseudonym (according to Dean Nieves). Dean Nieves verified during my hearing that he did not know the identity of the individual who submitted the video that initiated the investigation into this case, and stated that the individual may be operating under a pseudonym. Thus, this video has several evidentiary issues, making it both biased and unreliable to submit.

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Firstly, the video is clearly edited, with deliberate political purpose. At 34 seconds into the video (when I allegedly appear within the video) there is a cut within the video, for an unknown duration. The starting and stopping time were chosen, removing wider context surrounding the situation. The video also displays a political tweet prominently within frame for the entire duration, claiming that protesters were "Pro-Hamas" and "restricting Jewish students from campus yet again." The video was also only provided within the Instagram viewer during the hearing, thus the video description, account-holder, and comments were visible to the Panel. The person who submitted did not attend the hearing, nor was any communication between them and the Office of Student Conduct submitted within the hearing packet.

My due process rights, and right of cross-examination, were violated by relying upon this video. The Office of Student Conduct never performed any verification procedures, or took steps to minimize prejudicial aspects within the video. With the pseudonymous non-affiliate witness not appearing at the hearing, I was deprived of my ability to "confront" and "cross-examine" the video provided against myself.

g) Violations of Right to Fair Process through Non-Provision of Reviewed Video and other Evidence

According to Hodgman, the demonstration spanned from 12:30 to 3:30pm, nearly 3 hours in length. Hodgman states that his reports were based upon "CSS and BWC video footage." Hodgman reports on various incidents across the three-hour time period.

Before the conduct charge even existed, I requested the full security camera incident footage through the Public Records Act. This request was summarily denied by the university. On December 19, 2025, and April 6, 2026, Director Hodgman wrote incident report supplementals, based entirely upon video records which were previously denied.

Three days prior to the hearing, I was told that a six minute hand-selected body-camera video snippet would be included within the hearing. I was told that I could only view the video, and that the recordings wouldn't be provided to me, due to FERPA regulations, despite other student conduct cases producing full video content (such as within the university's prosecution of Students for Justice in Palestine and Graduate Students for Justice in Palestine). Dean Nieves, without informing me and in violation of prior commitments, transcribed my requests to review specific timestamps for the panel and the video's audio quality was significantly impaired during this review session and eventual hearing.

During the hearing, Director Hodgman and Dean Nieves testimony spanned allegations within the full 3-hour time span. Director Hodgman stated that his testimony was informed solely through video recordings, as he wasn't present during the incident. The video recordings that he viewed, which are in the universities' possession, were not provided to me.

By withholding access to the complete recordings, the University deprived me of my right to review the evidence against me. As the court recently explained, "The accused must be

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permitted to see the evidence against him. Need we say more?" (*Doe v. Regents of the Univ. of Cal.* (Mar. 6, 2026, A170234)). By not providing access to full recordings, I was deprived of the ability to effectively cross-examine Director Hodgman's allegations.

h) Violations of Right to Fair Process by Charge Stacking and Introduction of New Charges after Designated Charging Period

According to the "Time Limitations" section of the Student Conduct Code, all charges must be "made within one year following discovery of the alleged misconduct, unless an exception is granted by the Vice Chancellor, Student Affairs (VCSA) or designee." The additional charges fall outside this year period, thus must be rejected.

The incident under investigation occurred on November 19, 2024. The initial student conduct charges were made on February 6, 2025. The charges were amended on April 28, 2025. The case was referred to the student conduct meeting on June 20, 2025. Yet, the charges were amended, for the third time, on April 6, 2026, over one year after the case was initially referred to the Student Conduct office and the office conducted an investigation into the alleged misconduct. During the hearing, Dean Nieves confirmed that no permission was sought from the Vice Chancellor of Student Affairs to add these additional charges, over a year following their discovery. So, the additional charges of 102.16 (Failure to Comply) and Section 102.07 (Violation of University Policy), of the UCLA Student Conduct Code; specifically, UCLA Interim Policy 850: General Use of UCLA Property, UCLA Interim Policy 852: Public Expression Activities, UCLA Interim Policy 860: Organized Events, must be withdrawn and voided.

The additional charges are also duplicative of prior charges, severely prejudicing the decision of the Student Conduct panel. The U.S. Constitution protects individuals from Double Jeopardy, or individuals being prosecuted twice for the same offense. *Blockburger v. United States* (1932) deployed the "same elements test", requiring each charge to include a distinct legal element. While the Double Jeopardy principle only formally governs criminal behavior, the legal analysis and formalized principle should be persuasive within the student conduct disciplinary process.

Under the "same elements" standard, there's no difference in analysis between the language of University Policy 850 [with respect to interfering with the free flow of campus traffic] and University Policy 852 [violating university policy with respect to impeding foot traffic]. The panel's identical reasoning and analysis for both charges aligns with this understanding. By including both charges, the Office of Student Conduct prejudiced the Student Conduct Panel.

i) These Procedural Violations Substantially Impacted the Panel's Decision

Taken together, the above procedural violations substantially impacted the Panel's findings because they demonstrate that the process violated my 1) due process rights, and 2) rights to free association and free expression. Had the University applied the constitutional principles I am entitled to, the Student Conduct Office would not be able to bring this to a hearing, let alone

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meet their evidentiary burden. The findings of a violation of Student Conduct Code 102.07 cannot be sustained and must be overturned.

2. The Proposed Sanctions are Grossly Disproportionate to the Severity of the Violation

> "If I'm a student and... I take a pen from the bookstore, and I'm let's say apprehended and that report is sent to the office for student conduct for an allegation of theft.... I would consider [that] a **fairly low-level violation**.... Suspension or dismissal or revocation of degree, and what I would say is a very serious allegation." - Benito Nieves to GSA Forum (4/16/26)

> "Displaying a poster where you're not supposed to. That's a time, place, and manner policy. That's a warning. **That is something that's warning-level.** If you are a student and you go disrupt a final exam... That has a much greater impact. That's probably not a warning-level violation." - Benito Nieves to USAC (7/7/26) (emphasis added)

Even if you find the procedural violations insufficient to overturn the Panel's finding of a violation, the sanctions imposed are grossly disproportionate to the severity of the violation. University policy requires sanctions to "be appropriate to the violation, taking into consideration the context and seriousness of the violation." Suspensions are severe, consequential sanctions, reserved for serious allegations of misconduct. A two-quarter suspension results in financial losses exceeding $20,000, the loss of health insurance coverage, and likely effective termination of my doctoral studies.

According to official university records responses, UCLA doesn't maintain any sanctioning guidelines or other documents prescribing the issuance of sanctions. It's unclear how Dean Nieves' made their sanctioning guidelines (the report states it was made in "consideration" of the committee's findings). However, the two-quarter suspension is a severe, grossly disproportionate sanction.

Although PACAOS Appendix H Sanctioning Guidelines were adopted following this case, they provide informative principles to consider when adopting sanctions. Within the PACAOS Sanctioning guidelines, suspensions are reserved for "severe or repeated violations" warranting separation from the institution. Suspensions are reserved for Tier 3 violations or severe Tier 2 violations including physical or verbal harassment.

PACAOS 100.00 prescribes several factors when considering sanctions. The following subsections roughly follow the described factors on sanctioning decisions.

a) The Hearing Report Findings should be Narrowly Construed (Severity of Violation)

Despite the Student Conduct Office's review spanning nearly three-hours of political protest, the Student Conduct Panel only found responsibility based upon a limited set of actions within the

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wider protest. As affirmed by Dean Nieves during the hearing, I'm only responsible for my own actions, and therefore sanctions should be limited to consideration of my own actions.

In their decision, the panel specifically notes that I complied with directions from UCPD and Mr. Miller, was reasonable in staying within Bruin Plaza to deliver messages, did not interfere with educational programs, was not an organizer of the demonstration, and did not delay or linger to commit a crime.

The Panel's decision alleged no physical violence or harassment, or any behavior that caused violence upon others. Within the hearing, Dean Nieves explicitly affirmed that he didn't see me as making physical contact with any other individual. There's no allegation that I caused personal injury or property damage.

When finding responsibility, the panel only focused on six minutes, in comparison to the entire three hour demonstration. Within these six minutes, the student conduct panel largely focused on the lack of my physical movement to determine responsibility.

b) Alleged Harm is Insignificant compared to Sanction Severity (Impact on or harm to other members of the University community or the community as a whole)

The alleged harm, as seen within the conduct report, is insignificant compared to the sanction severity. The student conduct panel held me responsible for "not moving" upon being approached by three individuals, and allegedly causing them additional time to get to their final destination.

Consideration of this additional walking time shows minimal harm. If these three individuals side-stepped me, it would have added, at most, an additional twenty seconds to their walking path, similar to those deviating due to large crowd gatherings within Bruin Plaza. If these individuals decided to circumnavigate the demonstrations, they would have faced, at most, a two-and-a-half minute detour from walking around the Student Activities Center. This is proportional to waiting at a slow traffic light to cross the street.

Additionally, there's no allegation that my actions directly resulted in this alleged harm. In the hearing, Dean Nieves agreed that I could only be held responsible under the Student Code of Conduct for my actions. As I was never "interlinking" arms with other individuals and the Office of Student Conduct continually confirmed that I was a few feet in front of, or behind, the main demonstration, this minor harm can't be attributed solely to me. If the space that I occupied was transformed into air, these individuals likely would have faced the same minor deviations to their walking routes.

At a Graduate Students Association Meeting at a Graduate Student Forum on April 16, 2026, Dean Nieves claimed minor theft (a violation of the law and university policy) from the university store to be a low-level violation, therefore not warranting a suspension-level sanction. In an Undergraduate Student Association Meeting, Dean Nieves claimed minor violations of the Time,

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Place, and Manner policies are warning-level violations. Dean Nieves claimed disrupting final examinations as a suspension-level sanction.

Compared to Dean Nieves' public statements on sanctioning decisions (and consideration of community factors), the two-quarter sanction is grossly disproportionate. Outside of minor walking deviations for a few isolated individuals, there is no alleged harm as significant as disrupting a final exam.

c) No Disruption or Obstruction of University Activity (Degree to which the student's behavior disrupted or obstructed University activities)

Within their decision, the student conduct panel denied that I disrupted or obstructed university or educational activity. The panel specifically found there was insufficient evidence to determine that I "interfered with another individual's ability to participate in their educational program on UCLA Property." There's no allegation that any university activity was disrupted or obstructed as a result of my actions.

d) Multiple Responsible Findings Should Not Increase Sanctions (Number of violations associated with the incident)

On April 6, 2026 (over a year since the original conduct case referral), Dean Nieves added additional charges based upon the same underlying behavior. Importantly, Dean Nieves added charges for violating university policy "with respect to interfering with the free flow of campus traffic" and violating university policy "with respect to impeding foot traffic" for the same underlying facts and requiring nearly identical analysis. Under any reasonable analysis, if you "impeded" foot traffic then you must have "interfered" with campus traffic. Within the hearing packet, the conduct panel's analysis is exactly repeated for both charges.

Increasing sanctions based upon multiple responsible findings would constitute "double punishment" for the same underlying behavior. The U.S. Constitution protects individuals from Double Jeopardy, or individuals being prosecuted twice for the same offense. *Blockburger v. United States*, 284 U.S. 299 (1932) deployed the "same elements test", requiring each charge to include a distinct legal element. While the Double Jeopardy principle only formally governs criminal behavior, the legal analysis and formalized principle should be persuasive within the student conduct disciplinary process.

If this "same elements tests" is applied within this student conduct case, both charges would have been combined. This is acknowledged by the hearing packet having identical analysis (outside the charging notation) for both charges. Increasing sanction duration based upon the identical charging information would be unfairly punitive.

e) Progressive Sanctioning Doesn't Apply to this Conduct Charge (Student's previous Conduct Record)

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The sanctioning recommendation is based upon "previous student conduct sanction of Warning, issued November 24, 2025." For progressive sanctions to apply, prior sanctions should have been known at time of alleged violation. UCSD, a peer institution which, too, is governed by UC-PACAOS, directly states within sanctioning guidelines, that warnings must be known at time of violation to be considered in sanctioning decisions ("A report of an integrity violation only counts as 'history' if student is responsible for previous behavior(s) before the subsequent behavior occurred," UCSD Academic Sanctioning Guidelines).

The charge, at issue, is based on alleged conduct on November 19, 2024, or 370 days preceding the issuance of a warning for a finding of a violation in another, unrelated matter. The case for which I was issued a warning was for alleged conduct on May 15, 2025, or 177 days **after** the incident that led to this case. Thus, I could have no conceivable knowledge of the "warning" sanction at the time of alleged violation, nor could I have known about the other case.

The Office of Student Conduct is responsible for the delay in prosecution, controlling the scheduling of student conduct cases. Despite the other case being for actions following this case, the Office of Student Conduct delayed prosecution of this case to prioritize prosecution of the May 15 case.

f) PACAOS 100.00 Sanctioning Guidelines Suggest Non-Separation Sanction (Type of Violation)

Under PACAOS 100.00 Appendix H Sanctioning Guidelines, suspension-level violations are either considered a "Tier 3 Violation" or for Tier 2 Violations that include significant Physical or Verbal harassment. While table in Appendix H does not specifically state under what tier 102.07 (Violation of University Policy) falls, violations of other similar code sections are Tier 1 violations or Tier 2 violations that do not include physical or verbal harassment. For example, the table lists warnings and other university actions as appropriate sanctions for a violation of 102.07 (Violation of University Housing Policy) as a Tier 1 violation. Even as a Tier 2 or Tier 3 violation, appropriate sanctions are stated as "Housing Probation or Probation with option to add University Actions," and "Housing Exclusion with option to add University Actions," respectively. There is no suggestion that suspension or dismissal is an appropriate sanction for even a tier 2 or tier 3 violation. Thus, taking the guidelines for a 102.07 (Violation of Housing Policy) violation as an example, the sanction of suspension for a 102.07 (Violation of University Policy) violation is punitive and grossly disproportionate.

g) Severe Sanctions Have Already Been Applied

As a result of the interim actions of the Office of Student Conduct, severe sanctions have already been applied. I was already placed on Interim Suspension and Exclusion from Campus for 200 Days, or over three academic quarters. My master's degree has been withheld for 550+ days, or over seven academic quarters. Despite the Office of Student Conduct notifying me that my interim suspension had been repealed on March 24, 2026, the Office has not taken any

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practical steps to repeal this suspension. Notably, my academic transcript continues to denote an interim suspension.

These are already significant sanctions, already grossly disproportionate to the alleged conduct within this, or other cases. The proposed two-quarter sanction takes no consideration to the time served on the prior sanctions applied to the case.

h) Procedural Case History Supports Reduced Sanctions

Upon initiation of student conduct proceedings and unlike other student conduct cases, the conduct allegations were combined with other allegations from a different date (June 10, 2024). If this case represented a major violation of university policy, then it likely wouldn't have been deliberately "combined" with allegations from a separate incident five months preceding this case. This supports the inference that the Office of Student Conduct likely considered this a "minor" case when initiating the student conduct charges.

After raising substantive issues surrounding charging decisions (i.e. I was being charged with policies non-existent at time of violation), the Office of Student Conduct "split" (a procedure not recognized within the conduct code) the allegations into two separate cases. I was found not responsible for any violation of June 10, 2024.

i) Sanctions Punish Good-Faith Effort to Comply with University Officials

Within the conduct panel decision, it was recognized that "Kupsh complied with the instructions from Miller and UCPD regarding Kupsh being directed to inform individuals on Bruin Walk not to "block" the walkway." Thus, the conduct panel found it "credible" that UCPD gave an order to Kupsh to provide specific information to other individuals, and that this action was taken. As mentioned in preceding sections, this good-faith effort to comply with university official instructions was directly prosecuted by the Office of Student Conduct. By assigning major sanctions, despite the conduct panel's compliance determination, the Office of Student Conduct is discouraging good-faith efforts to comply with a university official's directions.

j) Prior History of Student Conduct Sanctions Doesn't Support a Suspension

Individual student conduct sanctioning records are confidential, due to FERPA privacy laws. Thus, gathering sanctioning insights due to prior records is difficult, due to lack of university data. Group Student Conduct Records, and associated sanctions, are public records. While the Group Student Conduct process follows different procedures, the sanctions roughly follow the associated individual student conduct process.

Table 1 contains a complete list of all student conduct charges, and associated sanctions, from 2019-2025. Notably, these cases all involve physical/verbal violence, law violations (underage drinking), and other associated conduct that's demonstrably and substantively worse than the alleged harm described within my student conduct case. Yet, within these group student conduct

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cases, UCLA only assigned probation and educational meetings, despite findings of responsibility. In none of these cases did UCLA conclude that the conduct warranted suspension.

k) Impact of Suspension is Severe

As a graduate student, any suspension requires me to reapply for admission to my department at the conclusion of the suspension period under UCLA policy. Before these proceedings, I was on track to graduate in the upcoming Fall or Winter quarter, depending on the completion of my dissertation. However, because of departmental funding limitations, my advisor has already informed me that they cannot financially support my scholarship beyond this academic year.

If this suspension is imposed, despite achieving candidacy, my ability to complete my doctorate will likely collapse. Readmission is contingent upon available departmental funding, yet my department has already indicated that no sustainable funding exists for me next year. After dedicating six years to my doctoral research, this suspension would likely render completion of my degree impossible. Thus, instead of functioning as intended as a temporary suspension from UCLA, these sanctions function effectively as a permanent dismissal from the University rather than a temporary suspension.

In conclusion, I respectfully request that you overturn the findings of responsibility and the imposed sanctions. In the alternative, if you decide to keep the findings of responsibility, I request that you modify the sanction to a non-reportable sanction.

Sincerely,

Dylan Kupsh

Attachments and Exhibits to this Appeal

Table 1: Group Student Conduct Alleged Conduct And Sanctions

Attachment A: Letter from Student Government Officials On Sanctioning Decision

Attachment B: Public Records Request Response for Group Student Conduct Records

Attachment C: Public Records Request Response on University Sanctioning Procedure

Attachment D: Public Records Request for Video Footage of Incident

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Table 1: Group Student Conduct Alleged Conduct and Sanctions		
Organization	Alleged Conduct	Sanction Assigned
Lambda Chi Alpha Fraternity	"Lambda Chi Alpha engaged in hazing and conduct that threatened the health or safety of others by requiring new members to stand in a shower, blindfolded, for an hour resulting in psychological harm. It is further alleged that Lambda Chi Alpha required new members to participate in a "challenge", which included consuming an entire bottle of vodka, whiskey, or tequila before being released to go home."	Probation, Educational Meetings
Sigma Chi Fraternity	Misconduct during pledging process where pledged members were: • Lined up every week and "berated, threatened with harm, demeaned" by active members • Forced to do physical activities, such as "wall-sitting on a slippery floor" and "planking." • Blindfolded and taken to a restroom where active members smoke cigarettes and blew smoke in their faces • Have "another initiation where they get hot sauce poured on them and have to sleep on the floor" • "deranged form of drill training, with active members drinking beforehand and utilizing the time to mentally abuse other individuals with any grievances." • Forced to drink "dangerous amounts of alcohol, as there was a case of one pledge being the beer taster and drinking enough alcohol until he was puking on an active's balcony outside."	One-Year Probation, Educational Meetings
Sigma Lambda Gamma Sorority	"Sigma Lambda Gamma engaged in hazing and conduct that threatened the health or safety of others by requiring new members to stand in line one or more times a week for several hours each time, while holding onto the hand/arm of other new members, not moving, and keeping their eyes closed. It is further reported that while standing in line new members were required to recite information and songs on command; and if this information was recited incorrectly, other individuals screamed at them and insulted them."	Probation, Educational Meetings

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UCLA Softball Team	Engaged in hazing and fostering a harmful environment by requiring new members to: • Join a group-chat named "Ur Personal Hell" where these members were individually called names and insulted. • Required to complete tasks, and subjected to physically-demanding punishments (like jumping into a pool and attending practice while wearing the wet clothes) if not completed. • Participate in "Initiation Night" where new (underage) members were required to consume alcohol, blindfold themselves, and instructed to dance for an audience while blindfolded.	Hazing Prevention Educational Classes, Conflict-Resolution Services

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EXHIBIT O

10/12/2026

UNIVERSITY OF CALIFORNIA, LOS ANGELES

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OFFICE OF THE VICE CHANCELLOR
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2131 MURPHY HALL
BOX 951405
LOS ANGELES, CA 90095-1405

July 31, 2026

CONFIDENTIAL

Dylan Kupsh
dkupsh@ucla.edu
Log# IR 01917-001-2025

Dear Dylan,

I have received your request for reconsideration of the final decision that was sent to you on June 15, 2026.

After considering the individual circumstances of this matter, including the additional information that you shared in your email dated July 13, 2026. **I am upholding the sanction and you will be placed on a Suspension for two Quarters: Summer 2026 Quarter and Fall 2026 Quarter (June 22, 2026 – December 11, 2026)**. Following the lifting of this suspension, if you wish to resume graduate study at UCLA you must apply for readmission through the Graduate Division's online application. It is your responsibility to meet the published deadline for submitting all of the required components of the application process to the Division and to the department. You should understand that readmission is not guaranteed and that the decision on the application will be made by departmental faculty based on their judgment of your academic record, the number of graduate student slots available, and your competitiveness with current applicants. If you have any questions, you may contact the Office of Student Conduct by phone (310-825-3871).

After the five-year retention period, provided you have no further disciplinary action, the file will then be destroyed. Further violations of the *Student Conduct Code* will result in additional disciplinary action, including but not limited to additional suspension or dismissal.

I wish you all the best in your future endeavors and beyond.

Sincerely,

Monroe Gorden

Monroe Gorden, Jr., J.D.
Vice Chancellor – UCLA Student Affairs

10/12/2026

cc: Benito Nieves, Associate Dean of Students
Emma Tracewell, Program Coordinator
Estrella Arciba, Assistant Dean, Office of Academic and Postdoctoral Services

10/12/2026

EXHIBIT P

10/12/2026

University of California, Los Angeles
Student Conduct Committee Hearing Report
In re: Dylan Kupsh

I. Allegations

In a letter dated April 28, 2025, amended from a letter dated February 6, 2025, Assistant Dean of Students, Bryan Murotake (Dean Murotake), notified student Dylan Kupsh (Kupsh) that Kupsh was being charged with allegedly violating the *UCLA Student Conduct Code,* Section 102.07 (Violation of University Policy) [in reference to *UCLA Regulations on Activities, Registered Campus Organizations, and Use of Properties* with respect to interfering with free flow of pedestrian traffic]:

> "Specifically, it has been reported that on or around June 10, 2024, in a campus public space near Young Hall, you blocked the free flow of campus pedestrian traffic by blocking a student's access to a space on or around Young Hall."

II. The Hearing

A Hearing was held on February 27, 2026, and continued on March 9, 2026, to consider the allegations and determine whether, by a preponderance of the information presented, it was more likely than not that there was a violation by Kupsh.

The Student Conduct Committee Hearing Panel (Panel) was chaired by [redacted] and included [redacted] and [redacted]. All participants participated over Zoom.

Alex Dring served as the Hearing Administrator.

Assistant Dean of Students, Bryan Murotake (Dean Murotake), provided an overview of the case and was available to answer questions.

[redacted] (Witness 1), participated in the Hearing as a Witness.

UCLA Alumnus, [redacted] (Student's Witness 1), participated in the Hearing as Kupsh's Witness 1.

UCLA Alumnus, [redacted] (Student's Witness 2), participated in the Hearing as Kupsh's Witness 2.

Student, [redacted] (Student's Witness 3) participated in the Hearing as Kupsh's Witness 3.

The accused student, Dylan Kupsh (Kupsh), participated in the Hearing.

[redacted] participated in the Hearing as Kupsh's Support Person.

Jaweed Kaleem participated in the Hearing as Kupsh's Support Person.

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Amruta Trivedi participated in the Hearing as Kupsh's Advisor.

This report summarizes the findings of the Panel in regards to this case, and the information presented which the Panel found significant to their findings. This report does not represent a transcript of the Hearing proceedings.

Per Section III.K.9 of the *Code*, access to the full audio recording of the Hearing will be provided to any student considering submitting a response to the Hearing report.

III. Findings

The Panel found that there was Insufficient Information to demonstrate by a preponderance standard that Kupsh violated Section 102.07 (Violation of University Policy) of the *UCLA Student Conduct Code.*

IV. Information Presented

Bryan Murotake (Assistant Dean of Students and Dean Assigned to Case)

Dean Murotake provided an overview of the case. Dean Murotake explained that the Office of Student Conduct received a report on August 19, 2024, regarding a group of individuals "gathered" outside of Young Hall.

Dean Murotake shared that it was reported that the individuals began "surrounding" the reporting party and "blocked" the reporting party's access to the space outside of Young Hall.

Dean Murotake shared that it was reported that the reporting party recognized Kupsh as one of the individuals that was "blocking" the reporting party's access to the space outside of Young Hall.

Dean Murotake met with Kupsh on March 5, 2025, to discuss the allegations. Kupsh shared the following with Dean Murotake:

> Kupsh asked Dean Murotake if the student conduct *Code* charge was "the same code charge" that was listed in the documents that Dean Murotake shared with Kupsh. Dean Murotake shared with Kupsh that Kupsh was accused of violating Time, Place, and Manner policy, (TPM Policy) specifically interim UCLA Policy 850: *General Use of UCLA Property*. Dean Murotake shared with Kupsh that the section in the TPM policy that was relevant to the allegations was regarding "blocking walkways."
>
> Kupsh asked Dean Murotake to confirm when interim UCLA Policy 850 was implemented. Dean Murotake shared that the interim UCLA Policy 850 policy was implemented on September 4, 2024.

Kupsh asked Dean Murotake when the alleged violation occurred. Dean Murotake shared with Kupsh that the alleged violation was reported to have taken place on June 10, 2024.

Kupsh shared that interim UCLA Policy 850 could not be applied to the alleged June 10, 2024 incident, based on the interim policy's implementation date.

Dean Murotake shared with Kupsh the correct policy that was in place on June 4, 2024, which was the *UCLA Regulations on Activities, Registered Campus Organizations, and Use of University Properties*.

Dean Murotake shared that Kupsh did not accept responsibility for the alleged violation of Section 102.07 (Violation of University Policy) [in reference to *UCLA Regulations on Activities, Registered Campus Organizations, and Use of Properties* with respect to interfering with free flow of pedestrian traffic] of the *Code*.

Dean Murotake shared that Dean Murotake referred Kupsh's case to the Student Conduct Committee on June 20, 2025.

Dean Murotake shared that Dean Murotake met with Kupsh on February 23, 2026, to review videos of the alleged incident that were submitted to Dean Murotake. Dean Murotake shared that Kupsh did not comment on the videos.

In response to questions from the Panel, Dean Murotake shared the following:

Dean Murotake shared that Dean Murotake did not meet with the reporting party during Dean Murotake's administrative review of Kupsh's case.

Dean Murotake shared that the TPM policy that is relevant to Kupsh's case was the Section titled "Use of University Properties" from the *UCLA Regulations on Activities, Registered Campus Organizations, and Use of University Properties*, which stated, "No person on University property or official University functions may block entrances, or otherwise interfere with the free flow of traffic into and out of campus buildings."

Dean Murotake shared that "the gathering" of individuals at the alleged incident was not a part of Dean Murotake's administrative review.

In response to questions from Kupsh, Dean Murotake shared the following:

Dean Murotake shared that there were other components of the UCLA Student Conduct Code that are not listed in a University of California Policies Applying to Campus Activities, Organizations, and Students (PACAOS) document that Kupsh shared with Dean Murotake.

Dean Murotake shared that the Interim Director of the Office of Student Conduct provided accurate information to Kupsh in an email regarding policies.

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Dean Murotake shared that all statements or documents that were a used in Dean Murotake's administrative review were shared with the Student Conduct Committee, which included "all emails, videos, and notes from meetings."

Dean Murotake shared that Kupsh was being charged with allegedly violating *UCLA Regulations on Activities, Registered Campus Organizations, and Use of University Properties.*

Dean Murotake shared that Dean Murotake read the entirety of *UCLA Regulations on Activities, Registered Campus Organizations, and Use of University Properties.*

Dean Murotake shared that the word "pedestrian" is not mentioned in Section 4 of *UCLA Regulations on Activities, Registered Campus Organizations, and Use of University Properties.*

Dean Murotake shared that the use of the phrase "free flow of pedestrian traffic" was used in Kupsh's original notification letter from the Office of Student Conduct because Dean Murotake "was under the impression" that the interim UCLA Policy 850: *General Use of UCLA Property* were in effect during the date of the alleged incident. Dean Murotake shared that Dean Murotake informed Kupsh that the *UCLA Regulations on Activities, Registered Campus Organizations, and Use of University Properties* was the correct policy that was in place during the time of the alleged incident. Dean Murotake shared that the phrase "free flow of pedestrian traffic" was used in Kupsh's original notification letter from the Office of Student Conduct because "free flow of pedestrian traffic" was language that was present in interim UCLA Policy 850: *General Use of UCLA Property.*

Dean Murotake shared that the phrase "free flow of pedestrian traffic" was not present in *UCLA Regulations on Activities, Registered Campus Organizations, and Use of University Properties.*

Dean Murotake shared that Kupsh emailed Dean Murotake on March 5, 2025, to inform Dean Murotake that Kupsh was being accused of violating a policy that was not in place during the time of the alleged incident.

Dean Murotake shared that Dean Murotake informed Kupsh that the policy charge was updated to reflect the content in *UCLA Regulations on Activities, Registered Campus Organizations, and Use of University Properties.*

Dean Murotake shared that the Office of Student Conduct could "update and amend" notice letters that are sent to students to reflect "correct" information.

Dean Murotake shared that Dean Murotake provided a notification letter to Kupsh on April 28, 2025, that was dated February 6, 2025. Dean Murotake shared that the notification letter that was sent to Kupsh on April 28, 2025, was included in the Hearing

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packet. Dean Murotake shared that the notification letter sent to Kupsh on April 28, 2025, contained "different information" than the notification letter that was sent in February of 2025.

Dean Murotake shared that the notification letter that was sent to Kupsh on February 6, 2025, was not included in the Hearing packet because it did not contain the correct policy that Kupsh was being accused of violating.

Dean Murotake shared that the notification letter that was sent to Kupsh on April 28, 2025, "was not intentionally backdated."

Dean Murotake shared that Dean Murotake "did not recall" Kupsh notifying Dean Murotake of the "incorrect notification email" and "lack of inclusion of the original notification email."

Dean Murotake shared that it was "standard practice" for all interview notes and notes from meetings with the accused student to be included within the Hearing packet.

Dean Murotake shared that a meeting between Dean Murotake and Kupsh took place on June 13, 2025. Dean Murotake shared that the notes from the meeting between Dean Murotake and Kupsh on June 13, 2025, were not included in the Hearing packet.

Dean Murotake shared that the interview notes from a meeting on March 5, 2025, between Dean Murotake and Kupsh "should reflect" the conversation that took place on March 5, 2025. Dean Murotake shared that Dean Murotake's interview notes stated that Dean Murotake would "work with [Kupsh] to address any inconsistencies" in the meeting notes.

Dean Murotake shared that the interview notes from March 5, 2025, regarding Kupsh's "denial of responsibility" took place in June of 2025, rather than March 5, 2025. Dean Murotake shared that Kupsh objected to Dean Murotake's interview notes from March 5, 2025, because of redactions made by Dean Murotake. Dean Murotake shared that Kupsh objected to Dean Murotake's interview notes from March 5, 2025, because of the inclusion of the "denial of responsibility" which took place in June of 2025. Dean Murotake shared that the interview notes from March 5, 2025, were included in the Hearing packet with the edits that Kupsh made.

Dean Murotake shared the Hearing packet does not include Kupsh's objections to the redactions and "additions" to the interview notes from March 5, 2025.

Dean Murotake shared that Dean Murotake reviewed *UCLA Regulations on Activities, Registered Campus Organizations, and Use of University Properties* with Kupsh during a meeting on June 13, 2025. Dean Murotake shared that Dean Murotake did not read the entire policy to Kupsh; Dean Murotake specified that Dean Murotake read the specific section regarding the allegations of Kupsh's case to Kupsh.

Dean Murotake shared that Dean Murotake shared with Kupsh that "it did not seem as if [Kupsh] was blocking access to Young Hall" when reviewing videos of the alleged incident with Kupsh.

Dean Murotake shared that Dean Murotake did not include meeting notes from June 13, 2025, in the Hearing packet. Dean Murotake stated, "I probably overlooked it."

Dean Murotake shared that an email sent to Benito Nieves, Interim Director of the Office of Student Conduct, on August 19, 2024, was correspondence related to Kupsh's case. Dean Murotake shared that this email was not included in Kupsh's Hearing packet. Dean Murotake shared that not including the email in the Hearing packet was not "misleading" because the email was not a document that was part of Dean Murotake's administrative review for Kupsh's case.

Dean Murotake shared that the videos of the alleged incident took place near the courtyard of Young Hall.

Dean Murotake shared that the alleged incident was reported as a UAW (United Auto Workers) meeting.

Dean Murotake shared that there was not an allegation for the reported incident on June 10, 2024, regarding fundraising, commercial activity, sale of non-commercial material, distribution of literature, use of amplified sound, or setup of tables or other infrastructure.

Dean Murotake shared that a meeting outdoors on University property could be lawful activity.

Dean Murotake shared that the alleged incident on June 10, 2024, was not reported as a meeting that disrupted any classroom or other University activities.

Dean Murotake shared that a video of the alleged incident showed Witness 1 saying, "Oh hi, Dylan. Are you afraid of Canary Mission?"

Dean Murotake shared that Dean Murotake was unaware of the "Canary Mission" website.

Dean Murotake shared that Witness 1 reported Kupsh's "Canary Mission" profile to the Office of Student Conduct.

Dean Murotake shared that Dean Murotake did not have any information regarding if the Office of Student Conduct reviewed Kupsh's "Canary Mission" profile.

Dean Murotake shared that Dean Murotake did not have any information regarding why Kupsh's "Canary Mission" profile was not included in the Hearing packet for Kupsh's case.

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Dean Murotake shared that Dean Murotake did not "consult" with the "Canary Mission" website regarding Kupsh's case.

Dean Murotake shared that Dean Murotake stated on February 23, 2026, in a meeting between Kupsh and Dean Murotake, that the alleged incident was regarding "blocking the pedestrian entrance to Young Hall."

Dean Murotake shared that Dean Murotake was unaware of which entrance of Young Hall was "blocked" because Dean Murotake did not meet with Witness 1 in Dean Murotake's administrative review.

Dean Murotake shared that there was "a lot of space for [Witness 1] to move around" based on the videos of the alleged incident.

Dean Murotake shared that Dean Murotake did not recall if Witness 1 stated that Witness 1 wanted to "leave the Life Sciences building" in the videos of the alleged incident.

Dean Murotake shared that Kupsh denied responsibility for violating *UCLA Student Conduct Code,* Section 102.07 (Violation of University Policy) [in reference to *UCLA Regulations on Activities, Registered Campus Organizations, and Use of Properties* with respect to interfering with free flow of pedestrian traffic].

Dean Murotake shared that Dean Murotake did not have information regarding if the Office of Student Conduct received "special instructions" from the Federal Government, UC Regents, or any other office regarding the "processing" of Kupsh's case.

Witness 1 (Presentation from Witness 1)

Witness 1 shared that a group of UAW members were "gathered" near Young Hall on June 10, 2024, "to organize how to best disrupt campus operations and demand that UCLA adopt Boycott, Divestment, and Sanctions."

Witness 1 shared that Witness 1 approached the group of UAW members on June 10, 2024, to "listen to the discussion and recorded statements."

Witness 1 stated, "A group of students and faculty members began surrounding me and blocking my access to the space."

Witness 1 shared that Witness 1 recognized "some, but not all" of the individuals who "restricted" Witness 1's access to the campus space.

Witness 1 shared that there was "obstruction" regarding Witness 1's access to Young Plaza.

In response to questions from the Panel, Witness 1 shared the following:

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Witness 1 shared that Witness 1 was trying to access Young Hall at the time of the alleged incident.

Witness 1 shared that Witness 1 "wanted to walk around Young Hall." Witness 1 stated, "My lab is right next to Young Hall, so I was trying to get to my lab."

Witness 1 stated, "I was not able to freely move around Young Hall… because the group was trying to control which direction I was going by physically pushing me."

Witness 1 shared that the group of individuals near Young Hall made "small exits" to direct Witness 1 "off the Young Hall platform."

Witness 1 stated that the group of individuals were "literally pushing [Witness 1] off the stairs."

Witness 1 shared that Witness 1's lab was in "the building next to Young Hall."

Witness 1 shared that Witness 1 was aware of approximately four-to-six entrances and exits of Young Hall.

Witness 1 shared that Kupsh prevented Witness 1 from accessing every entrance to Young Hall.

In response to questions from Kupsh, Witness 1 shared the following:

Witness 1 shared that Witness 1 did not recall if Witness 1 submitted reports to the Office of Student Conduct on August 19, 2024.

Witness 1 shared that Witness 1 emailed Benito Nieves, Interim Director of the Office of Student Conduct, to submit videos of the alleged incident and regarding Kupsh's "Canary Mission" profile.

Witness 1 shared that the communication between Witness 1 and the Office of Student Conduct that took place after Witness 1 submitted videos of the alleged incident was regarding making the videos of the alleged incident "private."

Witness 1 shared that Witness 1 was walking towards Boelter Hall at the time of the alleged incident.

Witness 1 shared that Witness 1 did not recall telling the group of individuals near Young Hall at the time of the alleged incident that Witness 1 was attempting to access the Life Sciences building. Witness 1 shared that Witness 1 did not want the group of individuals near Young Hall to be aware of where Witness 1's lab was.

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Witness 1 shared that the timestamps in the videos of the alleged incident that show Kupsh "blocking" Witness 1 from entering Young Hall were at seventeen seconds in "Video 16" and 2 minutes and 12 seconds of "Video 7."

Witness 1 shared that Kupsh did not allow Witness 1 to access Young Hall in "Video 5."

Witness 1 shared that "there were many instances" where Witness 1 "was completely encircled" during the alleged incident.

Witness 1 shared that Witness 1 was "pushed off the steps" near Young Hall in "Video 7" at approximately 2 minutes and 54 seconds.

Witness 1 shared that Kupsh "physically pushed" Witness 1 at approximately 10 minutes and 24 seconds in "Video 17."

Witness 1 shared that Witness 1 was able to "run into the center of the group" during the alleged incident.

Witness 1 shared that the group of individuals near Young Hall encircled Witness 1 in "Video 16."

Witness 1 shared that the duration of the video recording of the alleged incident was approximately 30 minutes.

Witness 1 shared that Witness 1 never entered Young Hall during the alleged incident.

Student's Witness 1 (Presentation from Kupsh's Witness 1)

Student's Witness 1 shared that Student's Witness 1 was present during the alleged incident on June 10, 2024.

Student's Witness 1 shared that Student's Witness 1 was a part of UAW. Student's Witness 1 shared that a group of UAW members had a meeting at the steps of Young Hall during the time of the alleged incident.

Student's Witness 1 shared that the meeting during the time of the alleged incident was "a meeting of a union caucus." Student's Witness 1 stated, "It wasn't an official union meeting."

Student's Witness 1 shared that the group of UAW members were sitting on the steps of Young Hall, and further noted that the group of UAW members did not block access to any building. Student's Witness 1 shared that the group of UAW members did not impede traffic to and from Young Hall.

Student's Witness 1 shared that a University official did not approach the group of UAW members to inform the UAW members that the meeting was in violation of University policy.

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Student's Witness 1 shared that Student's Witness 1 recognized Witness 1 during the alleged incident. Student's Witness 1 shared that Witness 1 approached the group of UAW members and "attempted to record images and video."

Student's Witness 1 shared that members of the UAW meeting raised keffiyehs "to obscure the view of the meeting."

Student's Witness 1 shared that members of the UAW meeting asked Witness 1 "to put [Witness 1's] camera away."

Student's Witness 1 shared that Witness 1 was told that Witness 1 could participate in the meeting of UAW members if Witness 1 "put [Witness 1's] camera away."

Student's Witness 1 stated, "[Witness 1] was not trying to enter any of the buildings in the Court of Sciences."

Student's Witness 1 stated, "And when [Witness 1] was not able to get a clear shot, [Witness 1] circled the group of seated people, going around to the opposite side, which prompted those with keffiyehs to also move to prevent [Witness 1] from recording participants."

Student's Witness 1 stated, "The claim that [Witness 1] was unable to enter a building is clearly disproved by the fact that [Witness 1] was able to continually walk in a circle around the meeting."

Student's Witness 1 stated, "[Witness 1] attempted to push [Witness 1's] way into the center of the meeting in order to disrupt it."

Student's Witness 1 shared that Witness 1 approached the UAW members. Student's Witness 1 shared that the UAW members did not make physical contact with Witness 1. Additionally, Student's Witness 1 shared that Witness 1 "was not pushed."

Student's Witness 1 shared that the UAW members "never surrounded [Witness 1]."

Student's Witness 1 shared that the videos of the alleged incident showed students walking around the UAW meeting.

In response to questions from the Panel, Student's Witness 1 shared the following:

> Student's Witness 1 shared that Student's Witness 1 did not observe Kupsh preventing Witness 1 from accessing Young Hall at any point during the alleged incident.
>
> Student's Witness 1 shared that Student's Witness 1 was present for the entirety of the alleged incident.

Student's Witness 2 (Presentation from Kupsh's Witness 2)

Student's Witness 2 stated, "I'm here in support of [Kupsh] and to call into question the accuracy of the University's Witness."

Student's Witness 2 shared information about Witness 1.

In response to questions from the Panel, Student's Witness 2 shared the following:

> Student's Witness 2 shared that Student's Witness 2 was not present at the alleged incident.

Student's Witness 3 (Presentation from Kupsh's Witness 3)

Student's Witness 3 shared information about Witness 1.

In response to questions from the Panel, Student's Witness 3 shared the following:

> Student's Witness 3 shared that Student's Witness 3 was not present at the alleged incident.

Dylan Kupsh (Presentation from the Accused Student)

Kupsh shared that Dean Murotake acknowledged that there was no specific policy that was in effect on June 10, 2024, that prohibited the obstruction of "the free flow of pedestrian traffic."

Kupsh shared that Dean Murotake could not identify Kupsh "blocking an entrance or exit" in the videos of the alleged incident.

Kupsh shared a video of the alleged incident from an alternate camera angle.

Kupsh shared that the video that Kupsh shared showed Kupsh telling Witness 1 that Witness 1 was "free to leave" and the statements, "You're able to go out this way, you're able to go out that way."

Kupsh shared a screenshot of a map of the surrounding area of the alleged incident. Kupsh shared that "there's no connection between Young Hall and Boelter Hall." Kupsh shared Boelter Hall and Young Hall are not buildings that are connected to each other.

Kupsh shared that the phrase "free flow of pedestrian traffic" was not a part of the *UCLA Regulations on Activities, Registered Campus Organizations, and Use of University Properties*.

Kupsh shared that Dean Murotake shared with Kupsh that did not block pedestrian access to Young Hall, in a meeting between Kupsh and Dean Murotake.

Kupsh stated that "the first time" Dean Murotake read the University policy that Kupsh was being charged with allegedly violating was during the first day of Kupsh's Hearing, on February 27, 2026.

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Kupsh shared that Dean Murotake could not identify a timestamp in the videos of the alleged incident that showed Kupsh in violation of University policy.

Kupsh shared that the UAW members meeting near Young Hall on June 10, 2024, did not violate University policy.

Kupsh shared that the videos of the alleged incident showed that there was approximately fifteen feet of space of the entrances and exits to Young Hall.

In response to questions from the Panel, Kupsh shared the following:

> Kupsh stated, "To me, it was more about protecting the safety of the individuals who were present" regarding the content of "Video 17."

V. Analysis

The Panel reviewed the information from the Hearing packet and the statements presented by Dean Murotake, Witness 1, Student's Witness 1, Student's Witness 2, Student's Witness 3, and Kupsh during the Hearing, in making their findings regarding the allegations.

Applicable *Code* Version: January 1, 2021

102.07: Violations of University Policy [in reference to UCLA Regulations on Activities, Registered Campus Organizations, and Use of Properties with respect to interfering with free flow of pedestrian traffic]:

Students may be subject to discipline for violation of any University policy.

No person on University property or at official University functions may:

- block entrances to or otherwise interfere with the free flow of traffic into and out of campus buildings.

The Panel referred to these definitions of the prohibited behavior in determining whether they believe Kupsh's behavior constituted a violation.

In particular, the Panel focused on the following:

The Panel reviewed the Hearing packet and the videos of the alleged incident.

The Panel considered Student's Witness 1's presentation; specifically, Student's Witness 1 shared that the group of UAW members were sitting on the steps of Young Hall and noted that the group of UAW members did not block access to any building. Student's Witness 1 shared that the group of UAW members did not "impede traffic" to and from Young Hall.

The Panel considered Witness 1's presentation; specifically, Witness 1 shared that Witness 1 was trying to access Young Hall at the time of the alleged incident. Additionally, Witness 1 shared that Witness 1 never entered Young Hall during the alleged incident. Witness 1 shared that Witness 1 "wanted to walk around Young Hall." Witness 1 stated, "My lab is right next to Young Hall, so I was trying to get to my lab." Witness 1 shared that Witness 1's lab is in "the building next to Young Hall." Witness 1 shared that Witness 1 was walking towards Boelter Hall at the time of the alleged incident. The Panel considered that Witness 1 shared that Kupsh prevented Witness 1 from accessing every entrance to Young Hall.

The Panel considered Kupsh's presentation; specifically, Kupsh contested that Kupsh was "blocking an entrance or exit" in the videos of the alleged incident.

The Panel concluded that there was Insufficient Information to determine that Kupsh engaged in behavior that prevented Witness 1's access into campus buildings, because the Panel determined that the videos of the alleged incident did not show Kupsh interfering with the free flow of traffic "into and out of campus buildings." The Panel determined that there was no evidence that Kupsh blocked Witness 1 from accessing the entrances or exits of Young Hall. Additionally, the Panel noted that Witness 1 was oriented in the opposite direction of Young Hall in the videos of the alleged incident, based on the Panel's observation of the videos. Additionally, the Panel concluded that Witness 1's statements were not credible due to Witness 1's inconsistencies within Witness 1's presentation; specifically, the Panel noted that Witness 1 stated that Witness 1 was attempting to access Young Hall at the time of the alleged incident, and later noted that Witness 1 was walking towards Boelter Hall at the time of the alleged incident. Additionally, the Panel noted that the none of the visible entrances of Young Hall were blocked in the videos of the alleged incident. The Panel noted that Student's Witness 1 statements were credible and consistent with the videos of the alleged incident, regarding the entrances of Young Hall and the campus buildings near the alleged incident not being blocked.

Therefore, for the reasons listed above, the Panel found that there was Insufficient Information to find by a preponderance standard that Kupsh violated Section 102.07 (Violations of University Policy) [in reference to UCLA Regulations on Activities, Registered Campus Organizations, and Use of Properties with respect to interfering with free flow of pedestrian traffic] of the *UCLA Student Conduct Code.*

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EXHIBIT Q

University of California, Los Angeles
Student Conduct Committee Hearing Report
In re: Dylan Kupsh

I. Allegations

In a letter dated August 29, 2024, Assistant Dean of Students, Emmy Passer (Dean Passer), notified student Dylan Kupsh (Kupsh) that he was being charged with allegedly violating the UCLA *Student Conduct Code,* Sections 102.13 (Obstruction or Disruption), 102.14 (Disorderly Behavior), 102.15 (Disturbing the Peace), and 102.16 (Failure to Comply):

> "Specifically, it has been reported that on June 10, 2024, you participated in setting up an unauthorized encampment in the courtyard between Dodd Hall and the UCLA School of Law building, and did so after having been warned and ordered by University officials to disperse and leave the campus. Additionally, it is reported that the encampment you were a part of disrupted an academic exam and restricted the movements of staff and students in and/or around Dodd Hall."

II. The Hearing

A Hearing was held on June 13, 2025, to consider the allegations and determine whether, by a preponderance of the information presented, it was more likely than not that there was a violation by Kupsh.

The Student Conduct Committee Hearing Panel (Panel) was chaired by [redacted] and included [redacted] and [redacted]. All participants participated over Zoom.

The Hearing was continued on July 2, 2025, to consider the allegations and determine whether, by a preponderance of the information presented, it was more likely than not that there was a violation by Kupsh.

The Student Conduct Committee Hearing Panel (Panel) was chaired by [redacted] and included [redacted] and [redacted] All participants participated over Zoom.

Dessiree Cuevas served as the Hearing Administrator.

Assistant Dean of Students, Emmy Passer (Dean Passer), provided an overview of the case and was available to answer questions.

Director of Special Investigations for Office of Campus Safety, William Hodgman (Director Hodgman), participated in the Hearing as a witness.

The accused student, Dylan Kupsh (Kupsh), participated in the Hearing.

Thomas Harvey participated in the Hearing as Kupsh's Advisor.

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Will Alden participated in the Hearing as Kupsh's Support Person.

Professor [redacted] participated in the Hearing as Kupsh's Support Person.

Civil Rights Lawyer, Ben Gharagozli (Gharagozli), participated in the Hearing as Kupsh's Witness 1.

UCLA Graduate Student, [redacted] ([redacted]), participated in the Hearing as Kupsh's Witness 2.

UCLA Undergraduate Student, [redacted] ([redacted]), participated in the Hearing as Kupsh's Witness 3.

UCLA Alumnus, [redacted] ([redacted]), participated in the Hearing as Kupsh's Witness 4.

UCLA Lecturer, [redacted] ([redacted]), participated in the Hearing as Kupsh's Witness 5.

UCLA Alumnus, [redacted] ([redacted]), participated in the Hearing as Kupsh's Witness 6.

UCLA Graduate Student, [redacted] ([redacted]), participated in the Hearing as Kupsh's Witness 7.

UCLA Undergraduate Student, [redacted] ([redacted]), participated in the Hearing as Kupsh's Witness 8.

UCLA Graduate Student, [redacted] ([redacted]), participated in the Hearing as Kupsh's Witness 9.

UCLA Graduate Student, [redacted] ([redacted]), participated in the Hearing as Kupsh's Witness 10.

Professor of Asian American and Gender Studies, [redacted] (Professor [redacted]), participated in the Hearing as Kupsh's Witness 11.

Professor of Political Science, [redacted] (Professor [redacted]), participated in the Hearing as Kupsh's Witness 12.

This report summarizes the findings of the Panel in regards to this case, and the information presented which the Panel found significant to their findings. This report does not represent a transcript of the Hearing proceedings.

Per Section III.K.9 of the *Code*, access to the full audio recording of the Hearing will be provided to any student considering submitting a response to the Hearing report.

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III. Findings

The Panel found that there was Insufficient Information to demonstrate by a preponderance standard that Kupsh violated Sections 102.13 (Obstruction or Disruption), 102.14 (Disorderly Behavior), 102.15 (Disturbing the Peace), and 102.16 (Failure to Comply) of the *UCLA Student Conduct Code.*

IV. Information Presented

Emmy Passer (Assistant Dean of Students and Dean Assigned to Case)

Dean Passer provided an overview of the case. She explained that the Office of Student Conduct received a referral from Sergeant Adrian Anderson (Sergeant Anderson) on June 10, 2024. Dean Passer explained that Sergeant Anderson reported that Kupsh allegedly "participated in setting up an unauthorized encampment in the courtyard between Dodd Hall and UCLA Law Building, and did so after being warned and ordered by university officials to disperse and leave the campus." Dean Passer shared that it was also reported that the encampments disrupted an academic exam and "restricted the movement of staff and students in or around Dodd Hall."

On September 25, 2024, Dean Passer met with Kupsh. Dean Passer shared the following statements provided by Kupsh:

> Kupsh stated that there were "pending criminal charges against him…based on civil unrest." Kupsh explained that he "faces prosecution and the Office of Student Conduct has scheduled this while the criminal case is ongoing, and that what he can share is limited due to the criminal case." Kupsh stated that "the timing with the Office of Student Conduct and the criminal process undermines the principles to be able to fully participate in the process."
>
> Kupsh said, "UCLA should be ensuring free expression, and this is described in the True Bruin Values for peaceful protesting." Kupsh stated that his student conduct case was "solely based on his beliefs." Kupsh explained that he was "misrepresented in the report as the group leader."

Dean Passer explained that she reviewed the incident summary submitted by Sergeant Anderson and the information shared by Director Hodgman. Dean Passer shared it was reported that on June 10, 2024, around 3:15 p.m., "approximately a hundred people were on the Royce Quad area and assembled an encampment located at the top of Janss Steps." Dean Passer shared that Sergeant Anderson explained that the group blocked access at the top of Janss Steps and students had to be redirected to other areas to access their classes. Dean Passer explained that Director Hodgman shared that access was blocked by "using water-filled, heavy k-rail barricades, chicken wire, zip ties, and makeshift plywood and plastic shields."

Dean Passer shared that Director Hodgman stated that the group was using amplified sound which disturbed the final in Royce Hall. Dean Passer stated that Director Hodgman explained that on June 10, 2024, around 3:46 p.m., a staff member from Royce Hall called UCPD to shared

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that the "noise from the protesters were disrupting final exams." The report explained that around 5:35 p.m., Administrative Vice Chancellor Michael Beck (AVC Beck) "hand-delivered a formal letter to [Kupsh] that the University had revoked consent for the group to be on the campus and they were ordered to leave." Dean Passer mentioned that Sergeant Anderson shared that the group drained red-dye water-filled barriers down Janss Steps. Dean Passer explained that Sergeant Anderson explained that graffiti was found in the Royce Hall area.

Dean Passer stated that Sergeant Anderson shared that the group moved from Royce Hall to Kerckhoff Patio, where a second encampment was set up that "[blocked] access and [used] amplified sound." Dean Passer shared that Director Hodgman explained that the group had "k-rail barricades, chicken wires, zip ties, and makeshift shields, and were supplemented with appropriated steel University patio chairs and tables." Dean Passer stated that Sergeant Anderson mentioned that a final exam in Moore Hall "had to be moved due to this group." Dean Passer explained that Director Hodgman stated that dispersal orders were given at Kerckhoff Patio around 6:44 p.m. Dean Passer shared that Director Hodgman stated that the dispersal orders could be heard on all sides of the encampment. The report stated that the group moved from Kerckhoff Patio to the courtyard between Dodd Hall and the UCLA Law School to set up a third encampment.

Dean Passer stated that Director Hodgman explained that "k-rail barricades, chicken wires, zip ties, and makeshift shields were supplemented with appropriated steel University patio chairs and tables at location number 3." Dean Passer explained that Director Hodgman stated that around 7:13 p.m., the UCLA Communication Center received a call that a facility staff member was "stuck" at the Law Building's courtyard. Dean Passer shared that Director Hodgman mentioned that "some of the protesters were removing electrical wires from all over the courtyard." Dean Passer explained that Sergeant Anderson shared that a final exam was interrupted, and the students were "forced to leave the building."

Dean Passer stated that Director Hodgman shared that UCPD Officers verbally gave a dispersal order to the protesters around 8:05 p.m. Dean Passer explained that Sergeant Anderson stated that 25 people were arrested at Dodd Hall.

Dean Passer stated that Director Hodgman reviewed UCPD reports and officers' body camera footage. Dean Passer explained that Director Hodgman stated that Kupsh was identified as one of the individuals who were present at the Royce Quad encampment. Dean Passer shared that Director Hodgman stated that around 3:39 p.m., "university officials met with [Kupsh]." Director Hodgman shared that Kupsh was "wearing a green safety vest and was recognized as the protest organizer." Dean Passer mentioned that Director Hodgman explained that Kupsh "was advised that the encampment was in violation of university policy." Director Hodgman observed on the body-worn camera footage that Kupsh said, "That the protesters would not leave until the names of all 46,000 individuals killed in Palestine were read aloud."

The report explained that around 3:46 p.m., a "Royce Hall staff member reported to UCPD Dispatch Center that noise from the protesters was disrupting final exams." Dean Passer stated that Director Hodgman shared that AVC Beck "advised [Kupsh] that if the encampment was not disbanded, the protestors would be in violation of California Penal Code Section 626.4." Director

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Hodgman explained that Kupsh stated that "once [Kupsh] got the notification, [Kupsh] would communicate the contents of the notification to everyone in there." The report shared that around 4:40 p.m., AVC Beck delivered the 626.4 notification to Kupsh. Dean Passer mentioned that Director Hodgman stated that there was "an error in the 626.4 notification" letter.

Director Hodgman explained that a second 626.4 notification letter was given to Kupsh by AVC Beck around 5:08 p.m. Dean Passer shared that Director Hodgman stated that there was "an error discovered in the second notification." Director Hodgman's report shared that Kupsh received the third 626.4 notification letter around 5:35 p.m. Dean Passer explained that AVC Beck "gave [Kupsh] 15 copies of the 626.4 notification." The report stated that around 5:44 p.m., UCPD used a "long-range acoustic device" that "repeatedly played a dispersal order." Dean Passer shared that Director Hodgman explained that around 6:37 p.m., the group established an encampment near Kerckhoff Patio. The report shared that Kupsh was present at the second encampment "and [was] depicted on a social media video post, apparently assisting with the fortification of the second encampment."

Dean Passer shared that Director Hodgman stated that around 6:44 p.m., UCPD "repeatedly [played] a dispersal notice." Director Hodgman shared that around 6:49 p.m., Kupsh dispersed from Kerckhoff Patio and "turned to one of the few people behind him and [said], 'Everyone out.'" Dean Passer mentioned that Director Hodgman stated that around 6:52 p.m., the group established the third encampment between the courtyard of Dodd Hall and the Law School. The report shared that Kupsh was at the third encampment. Director Hodgman listed the tools the group "utilized in the fortification of the courtyard area." The report explained that a final exam in Dodd Hall was disrupted. Director Hodgman stated that Kupsh was arrested around 8:08 p.m. Director Hodgman said, "As [Kupsh] was being detained, [Kupsh's] voice was recorded on an officers body camera stating, 'I'm just trying to get out."

In response to questions from Kupsh, Dean Passer shared the following:

> Dean Passer stated that she did not speak with AVC Beck during her review.
>
> Dean Passer explained that other than Kupsh, she did not speak with anyone that was present on June 10, 2024, during her review. Dean Passer shared that her review entailed working with Director Hodgman.
>
> Dean Passer shared that she did not review the police body-worn camera footage.
>
> Regarding Dean Passer and Kupsh's first initial meeting, Dean Passer stated that she used the current information that she had at the time when she met with Kupsh. Dean Passer explained that the information she had at the time when she met with Kupsh is on page 2 of Kupsh's Hearing Packet.

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William Hodgman (Director of Special Investigations for Office of Campus Safety and Witness)

Director Hodgman stated he serves as the Director of Specialized Investigations for the Office of Campus Safety. Director Hodgman shared that he serves as the liaison between UCPD and the Office of Student Conduct.

Director Hodgman stated that on June 10, 2024, AVC Beck "served [Kupsh] with a 626 notice to depart from the campus." Director Hodgman shared that the first 626.4 letter "had errors." Director Hodgman explained that around 5:35 p.m., AVC Beck delivered the correct 626.4 notice to Kupsh. Director Hodgman mentioned that Kupsh dispersed from the first encampment, but "[Kupsh] did not depart from campus." Director Hodgman said, "[Kupsh] went with other participants to a second encampment" at Kerckhoff Patio. Director Hodgman stated that Kupsh was "observed apparently assisting in fortifying that location by directing patio furniture to be used as part of the fortification."

Director Hodgman shared that dispersal orders were given at the second location and before 6:00 p.m. Director Hodgman explained that Kupsh dispersed from Kerckhoff Patio. Director Hodgman stated that Kupsh went to the third encampment at the courtyard between Dodd Hall and the Law School. Director Hodgman explained that Kupsh was detained at the third location.

In response to questions from the Panel, Director Hodgman shared the following:

> Director Hodgman stated that when he reviewed the body-worn camera footage, he did not hear a dispersal order at location 3.
>
> Director Hodgman shared that he observed that UCPD and AVC Beck interacted with Kupsh at the first location. Director Hodgman explained that Kupsh was "spoken to several times and seemed to acknowledge that [Kupsh] was a representative." Director Hodgman stated that Kupsh was given the 626 notification letter. Director Hodgman noted that Kupsh said, "Once I get the letter, I can communicate this to people inside the encampment." Director Hodgman shared that the third, corrected notification letter was given to Kupsh, along with 15 copies.
>
> Director Hodgman clarified that the first and second 626 notification letters had inaccurate information regarding the description of where things were occurring.
>
> Director Hodgman stated that the correct notification letter indicated that the Kupsh and the protesters had to withdraw from the campus. Director Hodgman read a section of the 626.4 notification letter. The 626.4 notification letter stated, "Your consent to remain on campus is hereby withdrawn, and you should depart the campus immediately or face disciplinary action, and or arrest."

In response to questions from Kupsh, Director Hodgman shared the following:

> Director Hodgman shared that he was not present on June 10, 2024.

Director Hodgman explained that UCPD has "customarily, and as a matter of practice, not disclosed their investigation materials for administrative purposes."

Director Hodgman stated that a Civil Rights and Criminal Defense attorney would have the same interpretations of the body-worn camera footage.

Director Hodgman shared that he did not have information that AVC Beck wore a body camera. Director Hodgman explained that the private security did not wear body cameras.

Director Hodgman stated that the 626.4 letter did not state Kupsh's name on the letter.

Director Hodgman reiterated that Kupsh received the correct letter around 5:35 p.m. Director Hodgman explained that the letter instructed Kupsh to "depart the campus immediately."

Director Hodgman reiterated that Kupsh was "one who met with representatives from the police department, and then on at least three occasions with [AVC Beck]." Director Hodgman explained that at least two times, Kupsh stated that he would share the information with the individuals inside the encampment. Director Hodgman shared that Kupsh "appeared to be a leader [and] a representative of the people in the encampment." Director Hodgman explained that other individuals did not come forward to receive the 626 letters.

Director Hodgman shared that there were dispersal orders "declaring it was an unlawful assembly." Director Hodgman stated that the first two locations had dispersal orders.

Ben Gharagozli (Presentation from Kupsh's Witness 1)

Gharagozli stated that he represents Kupsh in a legal matter. Gharagozli explained "the legal aspect of [Kupsh's] case." Gharagozli read a section of a California Penal Code. Gharagozli explained that the 626.4 notification letter "[did] not have the required facts that 626.4 subdivision B items 1 and 2 require." Gharagozli said, "Specifically, subdivision B.1 requires that the report contain the description of the person from whom consent was withdrawn." Gharagozli shared that Kupsh's name, address, and phone number "were absent from the report."

Gharagozli explained that the 626.4 notification letter had "no facts in support of disruption, of orderly operation of campus, [and] no facts that campus could not operate." Gharagozli stated that there was a "violation" of Kupsh's First Amendment right. Gharagozli explained the preponderance of evidence.

[redacted] **(Presentation from Kupsh's Witness 2)**

[redacted] stated that he arrived on campus on June 10, 2024, "as students were walking toward the Law School's courtyard." [redacted] shared that he brought food to the third location. [redacted] explained

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that he did not hear a dispersal order at location 3. [redacted] shared that "it was an entirely peaceful gathering."

[redacted] stated that there were only two exits from the courtyard. [redacted] shared that he saw "a large contingent of police moving in." [redacted] explained that he was informed that the "police officers suddenly blocked off both exits without giving an audible dispersal order." [redacted] shared his friend's experience and noted that his friend "was trapped and could not leave." [redacted] said, "Police officers [blocked] the entrances…[and] block off passageways."

[redacted] shared that he "went to say hi to [Kupsh]." [redacted] explained that Kupsh did not "engage in any sort of violence or disorderly behavior, nor any of the activities that they are accused of." [redacted] stated that he saw Kupsh "actively work with security and administration to make sure that dialogue and understanding [remained] open and transparent." [redacted] explained that he saw Kupsh "non-physically deescalate a violent situation caused by private security and counter protesters." [redacted] shared that Kupsh was "one of the many students peacefully gathered in the space." [redacted] stated that Kupsh was "simply one of the many victims of this police ambush on UCLA students holding a peaceful protest on the space where they live."

[redacted] (Presentation from Kupsh's Witness 3)

[redacted] stated that she was present on June 10, 2024. [redacted] shared that she joined the "protest located at Royce Quad a little before 3:23 p.m."

> [redacted] said, "From that moment, until I left campus after 11:00 p.m., I never once saw [Kupsh] use any sort of amplified sound. [Kupsh] did not direct me or anyone I was with at the protests to do anything."

[redacted] explained that she left the first location around 3:50 p.m. Tavassoli stated that the group was "blocked off from returning by security and police on bikes by approximately 4:20 p.m."

[redacted] stated that she did hear "a clear and audible dispersal order from where [she] was standing by at Royce Hall." [redacted] explained that she did not see Kupsh "[give] any sort of directions." [redacted] shared that she heard the dispersal order at the second location. [redacted] stated she "witnessed a clear lack of dispersal orders or notice of unlawful assembly" at the third location. [redacted] explained that she left the third encampment before 8:00 p.m. [redacted] stated that as she was leaving, she "noticed police forces marching towards the site without notice."

[redacted] said, "It was clear that no one who was at the third protest site was informed." [redacted] explained that if the group was informed of the dispersal order, then the group and Kupsh "would have cooperated." [redacted] stated she was at the protest to "engage in a peaceful, non-disruptive expression in support of the demand of the student movement towards the university including divestment from genocide and disclosure and transparency in investments." [redacted] shared that the "police began to kettle in students" and she "did not hear a dispersal order."

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[redacted] stated that "due to a lack of dispersal order and a clear exit due to the police's actions, it [was] clear that students like [Kupsh] were unable to leave the site." [redacted] said, "There was no clear exit, no audible dispersal order, or any other sort of order from the police, just chaos and police violence throughout the entire afternoon and evening." [redacted] shared that she "only ever saw [Kupsh] speak to administrators as a liaison." [redacted] noted that Kupsh and 30 other students wore the vests. [redacted] stated that Kupsh was "[singled] out" by the administrators.

In response to questions from Kupsh, [redacted] shared the following:

> [redacted] stated that the dispersal she heard at location 1 and location 2 instructed the group to leave a specific area. [redacted] explained that the dispersal order did not instruct the group to leave the campus.

[redacted] (Presentation from Kupsh's Witness 4)

[redacted] stated she was present on June 10, 2024. [redacted] explained that she and the protestors "face extreme violence that escalated very quickly." [redacted] explained that Kupsh "has been continuously deescalating situations." [redacted] stated that she and Kupsh spoke to UCLA student affairs staff members at the Law School.

[redacted] explained that she and Kupsh informed the Student Affairs staff members that "Kerckhoff was out of control [and] that APEX was out of control." [redacted] stated that she and Kupsh were there to "deescalate." [redacted] said, "Unfortunately, there was actually no opportunity to deescalate the situation at the Dodd Hall [and] the Law School courtyard because there was no dispersal order called."

In response to questions from Kupsh, [redacted] shared the following:

> [redacted] stated that the group collaborated as a group at the protests. [redacted] shared that Kupsh was not a protest leader.
>
> [redacted] explained that she did not remember the language regarding the dispersal orders at location 1 and location 2.

[redacted] (Presentation from Kupsh's Witness 5)

[redacted] stated that he was present "at the protest funeral procession on June 10, 2024, where students intended to read the names of the then 40,000 Palestinians killed." [redacted] shared that he felt that it was "important to be present as faculty because students exercising their right to free expression had been violently attacked by counter protesters." [redacted] explained that he spoke to Kupsh throughout the day.

[redacted] shared that Kupsh complied with the first dispersal order near Shapiro Fountain. [redacted] explained that he did not see Kupsh "engaged in disorderly behavior, disturb the peace,

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or failure to comply with any order from the police or university officials." [redacted] stated that he did not see Kupsh engaged "in any behavior that could even possibly be constructed as obstruction or a disruption." [redacted] shared that Kupsh did not use amplified sound. [redacted] mentioned that he did not see Kupsh "obstruct any pathways, entrances, or exits."

[redacted] said, "The police blocked entrances and disrupted the campus at every protest site." [redacted] shared that Kupsh wore a green vest and that "these vests did not signify organizers or leaders." [redacted] explained that the individuals who wore green vests were "participants who could be relied on to answer questions, locate things like water, or help in deescalating." [redacted] stated that he wore a green vest. [redacted] said, "I understood these 626 orders were meant to make students and community members aware that if they were found to violate law or policy, they could be banned from campus for a period of time."

[redacted] stated that Kupsh complied with the first and second dispersal orders that were given. [redacted] shared that at Kerckhoff Patio, "the private security did not issue any orders or directives." [redacted] mentioned that the police "blocked off both methods of exits." [redacted] stated that he "witnessed [Kupsh] trying to serve as a line of communication between the administration, the police, and the group." [redacted] stated that a dispersal order was not given at Dodd Hall and the Law School. [redacted] explained the actions that the police officers took.

[redacted] (Presentation from Kupsh's Witness 6)

[redacted] stated that on June 10, 2024, he went to Dixon Plaza in the afternoon to participate in the protest. [redacted] shared that when he was at Royce Quad, he heard the dispersal order and "everyone left in prompt compliance." [redacted] explained that the group moved to Kerckhoff Patio. [redacted] shared that the private security "created an unsafe situation" at Kerckhoff Patio. [redacted] explained that the group complied with the second dispersal order at Kerckhoff Patio.

[redacted] said, "[Kupsh] and some of 30 others in green and yellow vests encouraged people to comply with UCPD's orders." [redacted] stated that Kupsh and the others wearing the vests did not "act in a capacity leading the memorial." [redacted] shared that "no one person present was designated a leader." [redacted] explained that the group moved to the Law School courtyard. [redacted] stated that he saw "[Kupsh] comply with stated instructions and remain calm and [deescalated] tensions between protesters and administrators, security, and law enforcement."

[redacted] stated that UCPD were in "riot gear outside the northwest entrance to the courtyard, and in a matter of minutes chaos erupted as a line of riot." [redacted] explained that he did not hear a dispersal order at location 3. [redacted] shared that the police blocked the south exit of the courtyard. [redacted] explained the actions of the police.

In response to questions from Kupsh, [redacted] shared the following:

- [redacted] stated that he did not see Kupsh violate the Student Conduct Code.

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[redacted] shared that he was not able to hear the dispersal orders clearly. [redacted] explained that the dispersal orders instructed the group to leave a specific area and not the campus. [redacted] reiterated that there was not a dispersal order given at location 3.

[redacted] explained that Kupsh did not control his actions on June 10, 2024. [redacted] shared that Kupsh communicated between the administrators, the protesters, and the law enforcement.

[redacted] (Presentation from Kupsh's Witness 7)

[redacted] read a statement from a colleague in the math department who is a Teaching Assistant for Math 32B. [redacted] shared the following statements from the TA:

> TA explained that the TA "served as a proctor for a final exam scheduled from 5:00 p.m. to 8:00 p.m. on June 10, 2024, in Moore Hall." TA said, "I was blocked from entering Moore Hall by private security guards." TA shared that the TA "did not see or hear any protesters either inside Moore Hall or the entrance to Moore Hall." TA explained that the students in the class were "prevented from leaving the classroom by UCPD police officers and private security officers."
>
> TA shared that the professor for the class moved the final to a different building, "where the final was completed without interruption. TA stated that the students shared that the students did not see "any protesters in the building [or] hear any protesters within the room."

[redacted] (Presentation from Kupsh's Witness 8)

[redacted] stated that she was present on June 10, 2024. [redacted] said, "I do not believe that [Kupsh] was ever given any proper warning to leave campus or engage in any disorderly behavior at any moment." [redacted] shared that she heard the dispersal orders at Royce Quad and Kerckhoff Patio. [redacted] explained that after the second dispersal order, the group moved the Dodd Hall. [redacted] shared that she did not hear a dispersal order at Dodd Hall.

[redacted] stated that the police blocked off the pathways. [redacted] shared that she "exited through a bush while being pushed from behind." [redacted] said, "With no clear or audible dispersal given, [Kupsh] like the rest of us was not made aware that we were supposed to disperse." [redacted] explained that Kupsh did not enter Dodd Hall until he was arrested. [redacted] shared that she did not see Kupsh "being disruptive in any manner." [redacted] explained that throughout the day, Kupsh "[tried] to deescalate when he needed to." [redacted] shared that Kupsh served as a "police liaison for administrators and student groups."

[redacted] stated that Kupsh was not the leader. [redacted] shared that Kupsh and 30 other students wore the vest. [redacted] said, "I saw [Kupsh] try to maintain peace and try to deescalate situations and constantly comply with orders given by the police and admin, and private security in all three locations."

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In response to questions from Kupsh, [redacted] shared the following:

- [redacted] stated that she did not see Kupsh violate the Student Conduct Code.
- [redacted] shared that the dispersal order instructed the group to leave a specific place.
- [redacted] explained the difference between a police liaison and a protest leader.

[redacted] (Presentation from Kupsh's Witness 9)

[redacted] stated that he did not see Kupsh violate the Student Conduct Code. [redacted] shared that Kupsh was not the "ringleader." [redacted] explained that he did not see Kupsh "direct [redacted] or anyone else to do anything." [redacted] stated that "a police liaison is not a protest leader."

[redacted] shared that he heard the dispersal orders at Royce Quad and Kerckhoff Patio. [redacted] shared that the dispersal orders did not instruct the group "to leave the entire campus." [redacted] explained that there was not a dispersal order given at Dodd Hall or the Law School.

[redacted] (Presentation from Kupsh's Witness 10)

[redacted] stated that [redacted] was present on June 10, 2024. [redacted] explained that the "police surrounded and stormed the courtyard without declaring an unlawful assembly or issuing a dispersal order, leaving no room for peaceful exit or complying with orders." [redacted] shared that "people [were] really trying to leave peacefully and they were not able to." [redacted] stated that Kupsh "[worked] to bridge gaps in communication, and during the day he acted as a reputable source of clarity and information as a volunteer."

[redacted] said, "I remember [that] throughout the day on June 10, we were being presented with unclear, contradictory, and conflicting information from administrators and police." [redacted] shared that Kupsh "fulfilled his liaison role and just made sure that there was clarity between all parties on that day."

In response to questions from Kupsh, [redacted] shared the following:

- [redacted] stated that [redacted] did not see Kupsh violate the Student Conduct Code.
- [redacted] shared that the first two dispersal orders asked the group to leave a specific part of the campus and not from the entire campus. [redacted] stated that there was not a dispersal order given at the third location.
- [redacted] explained the difference between a police liaison and an administration liaison. [redacted] shared that Kupsh was not a protest leader. [redacted] stated that Kupsh was a volunteer and was acting as a mediator.

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[redacted] (Presentation from Kupsh's Witness 11)

Professor [redacted] stated that she saw Kupsh "in his capacity as a student liaison" on June 10, 2024. Professor [redacted] explained that she saw Kupsh throughout the day and she "never saw [Kupsh] engage in any of the activities that he's accused of." Professor [redacted] shared that she saw "[Kupsh] deescalate tensions, serve as a liaison between students and student affairs staff, and police and exercise his right to free speech."

Professor [redacted] stated that she heard the first dispersal order at Royce Hall. Professor [redacted] explained that the group moved to Kerckhoff Patio. Professor [redacted] shared that she heard the second dispersal order at Kerckhoff Patio. Professor [redacted] stated that the group moved to the Law School courtyard. Professor [redacted] said, "Once I walked outside of the courtyard, I could no longer hear the names being called out, nor could I hear much in the way of crowd noise from inside the courtyard." Professor [redacted] explained that when she exited the courtyard, she saw the police wearing riot gear.

Professor [redacted] stated that the police "blocked both exits." Professor [redacted] shared that "no one was allowed to go in or out." Professor [redacted] explained that there was not a dispersal order given at location 3. Professor [redacted] shared that "those who were attempting to leave were prevented from doing so." Professor [redacted] said, "I was present in or very near the courtyard the entire time prior to the arrests, and at no point did I hear a dispersal warning." Professor [redacted] explained that "once [Kupsh] was released, he immediately started supporting other students." Professor [redacted] stated that "the group [operated] on a consensus model and that no one student or even a handful of students [made] a decision for the group or tell others what they should do."

In response to questions from the Panel, Professor [redacted] shared the following:

> Professo [redacted] stated she did not know if faculty were serving as liaisons.

In response to questions from Kupsh, Professor [redacted] shared the following:

> Professor [redacted] stated that she did not see Kupsh violate the Student Conduct Code.
>
> Professor [redacted] explained that the first two dispersal orders instructed the group to leave a specific location.
>
> Professor [redacted] shared that she heard AVC Beck informed Kupsh that the 626 notification order only applies after people are arrested.
>
> Professor [redacted] stated that from her understanding, the 626 letter was not into effect until a person was arrested.
>
> Professor [redacted] explained the difference between a police liaison and a protest leader. Professor [redacted] shared that Kupsh did not control her actions on June 10, 2024.

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[redacted] (Presentation from Kupsh's Witness 12)

Professor [redacted] stated that he was present on June 10, 2024. Professor [redacted] explained that he saw Kupsh throughout the day and spoke with Kupsh on June 10, 2024. Professor [redacted] shared that he followed the students to "[ensured] their safety." Professor [redacted] noted that he was there until the late afternoon and "returned again as soon as [he] heard about the arrest that took place." Professor [redacted] explained that he was present "for the remainder of the evening until they were released."

Professor [redacted] shared that the "rally began with a march to honor Palestinians who died in Gaza since October 2023." Professor [redacted] explained that "students put up barricades and read the names of people who died" at location 1. Professor [redacted] shared that he left around that time. Professor [redacted] said, "I don't think that [Kupsh] committed any violation of UCLA policy and I think that [Kupsh] shouldn't be found responsible for these violations." Professor [redacted] explained that he did not see Kupsh "block a pathway on Bruin Walk, Portola Plaza, or anywhere else." Professor [redacted] stated that Kupsh served as a police liaison. Professor [redacted] shared that he "served in a similar role for faculty alongside [Kupsh]."

Professor [redacted] stated that Kupsh was not "warned clearly to leave campus at any time." Professor [redacted] explained that Kupsh was not "warned and ordered to disperse from the courtyard between Dodd Hall and the Law School building with an opportunity to leave." Professor [redacted] shared that from his understanding that 626.4 notification letter from AVC Beck was similar to the 626.4 notification letter that AVC Beck issued on May 22, 2024. Professor [redacted] explained that he learned that there was not a dispersal order given at Dodd Hall.

Professor [redacted] explained that AVC Beck "repeatedly sought out [Kupsh]." Professor [redacted] said, "I don't believe that [Kupsh] violated any of the student codes that [Kupsh] is accused of."

In response to questions from the Panel, Professor [redacted] shared the following:

Professor [redacted] stated that he returned to campus when the arrests were made.

Professor [redacted] explained the role of a police liaison. Professor [redacted] clarified that Kupsh shared the information from the university staff and police to the protesters.

Professor [redacted] shared that he was not present when 626.4 notification letter was given.

In response to questions from Kupsh, Professor [redacted] shared the following:

Professor [redacted] reiterated that difference of a protest leader and a police liaison.

Professor [redacted] shared that he did not see Kupsh use amplified sound.

Professor [redacted] stated that he did not see Kupsh enter any buildings or disrupt finals.

Professor [redacted] explained that he was not on campus when the dispersal orders were given.

Professor [redacted] shared that based on previous protest, his understand was that a dispersal order directed protestors to leave a specific part of campus.

Professor [redacted] stated that based on his understanding, the 626.4 notification only applied if someone was arrested.

Professor [redacted] shared that he would have left campus if he was ordered to. Professor [redacted] noted that Kupsh would have left campus if "it was more clear for [Kupsh] to leave campus."

Professor [redacted] reiterated that he did not see Kupsh violate the Student Conduct Code.

Dylan Kupsh (Presentation from the Accused Student)

Kupsh stated that "the only thing being used against [him] is a video that is being refused to be release." Kupsh explained that UCPD does not want to release the body-worn footage. Kupsh shared that he "did not violate the Student Code of Conduct and [he] followed all directions of the university." Kupsh noted that Director Hodgman and Sergeant Anderson were not present on June 10, 2024.

Kupsh stated that he and his witnesses were present on June 10, 2024. Kupsh explained that 11 of his witnesses shared that "they did not hear a dispersal order at Dodd Hall." Kupsh shared that 10 of his witnesses explained that "they heard a dispersal order at Royce Quad and Moore Hall." Kupsh reiterated that his witnesses stated that Kupsh followed the dispersal orders that were heard and that he did not use amplified sound. Kupsh noted that 11 of his witnesses shared that Kupsh did not enter any buildings. Kupsh said, "I was continually trying to deescalate situations in that I didn't do anything that instigated violence."

Kupsh noted that he and his witnesses explained that Kupsh served as a police liaison. Kupsh explained that he was "facilitating communication between administration, police, and protesters." Kupsh said, "I was not the group leader. I did not control the single action of another individual, nor did I have the ability to do that." Kupsh stated that he was sought out by "administration to play this role of communicator." Kupsh explained that AVC Beck would ask for him. Kupsh shared that "an instructor" in Moore Hall explained that "their class was not disrupted by protesters."

Kupsh stated that AVC Beck shared that a 626.4 notification letter "only applied if people were arrested." Kupsh explained that he complied with orders when he was arrested. Kupsh shared that "there is no sufficient evidence to find a violation of student conduct."

Kupsh read the legal definition of unlawful assembly. Kupsh stated that there were two dispersal give on June 10, 2024, one at Royce Quad and the second one at Kerckhoff Patio. Kupsh shared that he followed the dispersal orders. Kupsh explained that the first dispersal order at Royce

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Quad "said to leave the quad area" and the second dispersal order at Kerckhoff Patio said "to leave Kerckhoff Patio." Kupsh stated that when he was at Dodd Hall, he asked UCPD, LAPD, and APEX officers, "Can I leave this area?" Kupsh explained that an APEX officer gave him directions to leave and then he was arrested.

Kupsh read the legal definition of disturbance of the peace. Kupsh shared that his witnesses explained that Kupsh was "calm." Kupsh explained that he and his witnesses stated that he did not use amplified sound. Kupsh said, "I was mostly to the side and serving as the communicator between police and protesters, and relaying messages between different people." Kupsh stated that he did not enter any buildings.

Kupsh read the legal definition of lewd behavior. Kupsh stated that he was "consistently trying to deescalate." Kupsh shared that he did not block any pathways. Kupsh explained that he did communicate with the group when he received the 626.4 notification from AVC Beck. Kupsh stated that AVC Beck said, "If someone was to get arrested that day, they would be banned from campus for an extended duration of time." Kupsh shared that the 626.4 notification did not have his name listed. Kupsh explained that "there was no understanding that [he] had to immediately leave the entire campus."

Kupsh stated that Los Angeles City Attorney Office did not file charges. Kupsh reiterated that he did not violate the Student Conduct Code. Kupsh explained that the process of the 626.4 notification letter has changed since June 10, 2024.

In response to questions from the Panel, Kupsh shared the following:

> Kupsh stated that he has served as a police liaison in the past. Kupsh shared that he was not appointed to serve in this capacity.
>
> Kupsh shared that he first saw a 626.4 notification letter in May 22, 2024. Kupsh explained that he asked multiple questions to AVC Beck regarding the 626.4 notification letter on June 10, 2024. Kupsh reiterated that he was told that if someone was arrested, that person would be banned from campus.
>
> Kupsh explained that when he was arrested, there were other arrestees who were not present when the 626.4 notification was given.
>
> Kupsh stated that the LA City Attorney Office did not file charges.
>
> Kupsh shared that he has not spoken with AVC Beck since the incident.
>
> Kupsh stated that AVC Beck never told Kupsh which individuals were blocking the pedestrian access around Shapiro Fountain.
>
> Kupsh explained that finals were able to be completed. Kupsh shared that he did not obstruct the pathways or the buildings.

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V. Analysis

The Panel reviewed the information from the hearing packet and the statements presented by Dean Passer, Director Hodgman, Gharagozli, [redacted], Professor [redacted], Professor [redacted], and Kupsh during the Hearing, in making their findings regarding the allegations.

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102.13: Obstruction or Disruption

Obstruction or disruption of teaching, research, administration, disciplinary procedures, or other University activities.

102.14: Disorderly Behavior

Engaging in disorderly or lewd conduct.

102.15: Disturbing the Peace

Participation in a disturbance of the peace or unlawful assembly.

102.16: Failure to Comply

Failure to identify oneself to, or comply with directions of, a University official or other public official acting in the performance of one's duties while on University property or at official University functions, or resisting or obstructing such University or other public officials in the performance of or the attempt to perform their duties.

The Panel referred to these definitions of the prohibited behavior in determining whether they believe Kupsh's behavior constituted a violation.

In particular, the Panel focused on the following:

The Panel noted that Director Hodgman stated that Kupsh was "observed apparently assisting in fortifying [a] location by directing patio furniture to be used as part of the fortification." The Panel commented that Director Hodgman reported that Kupsh was present at the second encampment "and [was] depicted on a social media video post, apparently assisting with the fortification of the second encampment."

The Panel commented that [redacted] was present on June 10, 2024, and mentioned that he did not see Kupsh "obstruct any pathways, entrances, or exits." The Panel discussed how [redacted] stated that he did not see Kupsh engaged "in any behavior that could even possibly be constructed as obstruction or a disruption." The Panel noted that [redacted] shared that Kupsh did not use amplified sound. The Panel commented that [redacted] mentioned that he did not see Kupsh "obstruct any pathways, entrances, or exits." The Panel discussed how [redacted] said, "The police

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blocked entrances and disrupted the campus at every protest site." The Panel noted that [redacted] mentioned that the police "blocked off both methods of exits."

The Panel discussed how [redacted] explained that he did not see Kupsh "direct [redacted] or anyone else to do anything."

The Panel commented that [redacted] stated that from location 1, "until [she] left campus after 11:00 p.m., [she] never once saw [Kupsh] use any sort of amplified sound." The Panel noted that [redacted] said, "[Kupsh] did not direct me or anyone I was with at the protests to do anything."

The Panel noted that [redacted] explained that Kupsh did not control [redacted]'s actions on June 10, 2024.

The Panel noted Professor [redacted] shared that he did not see Kupsh use amplified sound. The Panel commented that Professor [redacted] stated that he did not see Kupsh enter any buildings or disrupt finals. The Panel noted that Kupsh shared that he did not block any pathways or disrupt any finals. The Panel commented that Professor [redacted] and Professor [redacted] stated during their presentations that they did not see Kupsh block any pathways, entered any buildings, or disrupt finals.

The Panel noted how Dean Passer stated that Sergeant Anderson mentioned that a final exam in Moore Hall "had to be moved due to this group."

The Panel reviewed the statement that [redacted] provided on behalf of a TA. The Panel noted that [redacted] explained that the TA "served as a proctor for a final exam scheduled from 5:00 p.m. to 8:00 p.m. on June 10, 2024, in Moore Hall." The Panel commented that the TA said, "I was blocked from entering Moore Hall by private security guards." The Panel discussed how the TA shared that the TA "did not see or hear any protesters either inside Moore Hall or the entrance to Moore Hall."

The Panel determined that there was insufficient information that Kupsh obstructed or disrupted universities activities. The Panel found, more likely than not, Kupsh did not obstruct or disrupt universities activities because there was inconsistent information. The Panel determined that, more likely than not, Kupsh did not assist the group in fortifying the encampment because [redacted], [redacted], and [redacted] stated that Kupsh did not "control" their actions. The Panel found that, more likely than not, Kupsh did not disrupt finals because a TA shared that the TA "did not see or hear any protesters either inside Moore Hall or the entrance to Moore Hall." Because of these reasons, the Panel determined it was more likely than not that Kupsh did not engage in a violation of Section 102.13 (Obstruction or Disruption).

The Panel noted that Director Hodgman's report shared that Kupsh received the third 626.4 notification letter around 5:35 p.m. The Panel commented that Dean Passer explained that AVC Beck "gave [Kupsh] 15 copies of the 626.4 notification." The Panel discussed how Director Hodgman explained that Kupsh was "spoken to several times and seemed to acknowledge that [Kupsh] was a representative." The Panel noted that Director Hodgman noted that Kupsh said, "Once I get the letter, I can communicate this to people inside the encampment."

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The Panel commented that [redacted] explained that he did not see Kupsh "engaged in disorderly behavior, disturb the peace, or [fail] to comply with any order from the police or university officials." The Panel noted that [redacted] explained that the individuals who wore green vests were "participants who could be relied on to answer questions, locate things like water, or help in deescalating." The Panel discussed how [redacted] shared that Kupsh "fulfilled his liaison role and just made sure that there was clarity between all parties on that day." The Panel noted that [redacted] stated that Kupsh "[worked] to bridge gaps in communication, and during the day he acted as a reputable source of clarity and information as a volunteer."

The Panel discussed how [redacted] shared that Kupsh was not a "protest leader." The Panel noted that [redacted] explained that Kupsh "has been continuously deescalating situations." The Panel considered how [redacted] said, "[Kupsh] and some of 30 others in green and yellow vests encouraged people to comply with UCPD's orders." The Panel commented that [redacted] stated that he saw "[Kupsh] comply with stated instructions and remain calm and [deescalated] tensions between protesters and administrators, security, and law enforcement."

The Panel noted that [redacted] explained that throughout the day, Kupsh "[tried] to deescalate when he needed to." The Panel commented that [redacted] shared that Kupsh served as a "police liaison for administrators and student groups." The Panel noted that [redacted] shared that Kupsh and 30 other students wore the vest. The Panel discussed how [redacted] said, "I saw [Kupsh] try to maintain peace and try to deescalate situations and constantly comply with orders given by the police and admin, and private security in all three locations." The Panel noted that [redacted] stated that Kupsh was a volunteer and was acting as a mediator.

The Panel noted that Kupsh and his witnesses shared that Kupsh served as a police liaison and not as the group leader. The Panel commented that Kupsh explained that he communicated the information he received from the police and staff to the protesters. The Panel discussed how Kupsh stated that, as a police liaison, he "deescalated situations" on June 10, 2024. The Panel noted that Kupsh shared that AVC Beck had conversations with Kupsh at location 1. The Panel noted that Kupsh's witnesses' statements were consistent that Kupsh served as the police liaison, was not the "group leader," and was trying to deescalate situations.

The Panel noted how Dean Passer stated that Sergeant Anderson mentioned that a final exam in Moore Hall "had to be moved due to this group."

The Panel noted that [redacted] shared that Kupsh did not use amplified sound. The Panel commented that [redacted] mentioned that he did not see Kupsh "obstruct any pathways, entrances, or exits." The Panel noted Professor [redacted] shared that he did not see Kupsh use amplified sound. The Panel commented that Professor [redacted] stated that he did not see Kupsh enter any buildings or disrupt finals. The Panel noted that Kupsh shared that he did not block any pathways or disrupt any finals. The Panel reviewed the statement that [redacted] provided on behalf of a TA. The Panel noted that [redacted] explained that the TA "served as a proctor for a final exam scheduled from 5:00 p.m. to 8:00 p.m. on June 10, 2024, in Moore Hall." The Panel commented that the TA said, "I was blocked from entering Moore Hall by private security guards." The

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Panel discussed how the TA shared that the TA "did not see or hear any protesters either inside Moore Hall or the entrance to Moore Hall."

The Panel found that there was not enough information that Kupsh engaged in disorderly behavior. The Panel determined that, more likely than not, a "protest liaison" was an individual that deescalates situations and communicates information with a protest group. The Panel determine that, more likely than not, Kupsh's behavior was not disorderly because [redacted], [redacted], [redacted], and [redacted] shared that Kupsh was serving within his capacity as a "protest liaison." The Panel found, more likely than not, Kupsh did not disrupt finals because there was inconsistent information. The Panel found that, more likely than not, Kupsh did not disrupt finals because TA shared that the TA "did not see or hear any protesters either inside Moore Hall or the entrance to Moore Hall." Because of these reasons, the Panel determined it was more likely than not that Kupsh did not engage in a violation of Section 102.14 (Disorderly Behavior).

The Panel noted that Director Hodgman shared that around 6:49 p.m., Kupsh dispersed from Kerckhoff Patio and "turned to one of the few people behind him and [said], 'Everyone out.'" The Panel commented that Director Hodgman stated that the correct notification letter indicated that the Kupsh and the protesters had to withdraw from the campus.

The Panel noted that [redacted] explained that the dispersal order did not instruct the group to leave the campus. The Panel noted that [redacted] stated that Kupsh complied with the first and second dispersal orders that were given. The Panel commented that [redacted] shared that the dispersal orders did not instruct the group "to leave the entire campus." The Panel noted that [redacted] explained that there was not a dispersal order given at Dodd Hall or the Law School

The Panel noted that [redacted] said, "I remember [that] throughout the day on June 10, we were being presented with unclear, contradictory, and conflicting information from administrators and police." The Panel commented that [redacted] shared that Kupsh did not use amplified sound. The Panel discussed how [redacted] mentioned that he did not see Kupsh "obstruct any pathways, entrances, or exits."

The Panel noted that Kupsh and his witnesses stated that the dispersal orders were for specific locations and not the entire campus. The Panel reviewed the 626.4 notification letter and noted that notification was not addressed to Kupsh. The Panel noted that Kupsh shared that a 626.4 notification letter from AVC Beck did not have his name listed. The Panel discussed how Kupsh and Professor [redacted] explained that AVC Beck shared that the 626.4 notification letter was only applicable if someone was arrested.

The Panel noted that [redacted] explained that the individuals who wore green vests were "participants who could be relied on to answer questions, locate things like water, or help in deescalating." The Panel discussed how [redacted] shared that Kupsh "fulfilled his liaison role and just made sure that there was clarity between all parties on that day." The Panel noted that [redacted] stated that Kupsh "[worked] to bridge gaps in communication, and during the day, he acted as a reputable source of clarity and information as a volunteer."

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The Panel noted that Kupsh and his witnesses shared that Kupsh served as a police liaison and not the "group leader." The Panel commented that Kupsh explained that he communicated the information he received from the police and staff to the protesters. The Panel discussed how Kupsh stated that, as a police liaison, he deescalated situations on June 10, 2024. The Panel noted that Kupsh shared that AVC Beck had conversations with Kupsh at location 1.

The Panel noted that Kupsh shared that he did not block any pathways or disrupt any finals. The Panel commented that Professor Hong and Professor [redacted] stated that they did not see Kupsh block any pathways, entered any buildings or disrupt finals. The Panel noted that Professor Hong and Professor [redacted] shared they saw and spoke with Kupsh throughout the protest.

The Panel found that, more likely than not, Kupsh did not participate in an unlawful assembly because Director Hodgman shared that there was not a dispersal order given at Dodd Hall. The Panel determined that, more likely than not, Kupsh complied with the dispersal orders at Royce Quad and Kerckhoff Patio because he and 11 of his witnesses stated that they heard the first two dispersal orders and left the specific locations. The Panel found that, more likely than not, Kupsh was not a part of an unlawful assembly because [redacted], [redacted], and [redacted] stated that the dispersal order did not instruct the group to leave the campus. The Panel determined that, more likely than not, a "protest liaison" is an individual that deescalates situations and communicates information with a protest group. The Panel determine that, more likely than not, Kupsh served as a police liaison because [redacted], [redacted], [redacted], and [redacted] shared that Kupsh was serving within his capacity as a protest liaison on June 10, 2024. Because of these reasons, the Panel determined it was more likely than not that Kupsh did not engage in a violation of Section 102.15 (Disturbing the Peace).

The Panel noted that Kupsh and his witnesses stated that the dispersal orders were for specific locations and not the entire campus. The Panel reviewed the 626.4 notification letter and noted that notification was not addressed to Kupsh. The Panel noted that Kupsh shared the 626.4 notification letter from AVC Beck did not have Kupsh's name listed. The Panel discussed how Kupsh and Professor [redacted] explained that AVC Beck shared that the 626.4 notification letter was only applicable if someone was arrested.

The Panel discussed how Director Hodgman stated that when he reviewed the body-worn camera footage, he did not hear a dispersal order at Dodd Hall. The Panel noted that Kupsh stated that he complied with the two dispersal orders that were announced at Royce Quad and Kerckhoff Patio. The Panel commented that Kupsh and 11 of his witnesses shared that "they did not hear a dispersal order at Dodd Hall."

The Panel commented that [redacted] stated that the dispersal she heard at location 1 and location 2 instructed the group to leave a specific area. The Panel noted that [redacted] explained that the dispersal orders did not instruct the group to leave the campus. The Panel noted that [redacted] stated that Kupsh complied with the first and second dispersal orders that were given. The panel discussed how [redacted] stated that he saw "[Kupsh] comply with stated instructions and remain calm and [deescalated] tensions between protesters and administrators, security, and law enforcement." The Panel noted that [redacted] explained that he did not hear a dispersal order at location 3.

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The Panel considered how [redacted] shared that she did not hear a dispersal order at Dodd Hall. The Panel noted that [redacted] said, "With no clear or audible dispersal given, [Kupsh] like the rest of us was not made aware that we were supposed to disperse." The Panel commented that [redacted] shared that the dispersal orders did not instruct the group "to leave the entire campus." The Panel noted that [redacted] explained that there was not a dispersal order given at Dodd Hall or the Law School

The Panel noted that [redacted] said, "I remember [that] throughout the day on June 10, we were being presented with unclear, contradictory, and conflicting information from administrators and police."

The Panel found that, more likely than not, Kupsh did not fail to comply because Director Hodgman shared that there was not a dispersal order given at Dodd Hall. The Panel determined that, more likely than not, Kupsh complied with the dispersal orders at Royce Quad and Kerckhoff Patio because he and 11 of his witnesses stated that they heard the two dispersal orders issued at locations 1 and 2, and then they left the specified locations. The Panel found that, more likely than not, Kupsh followed the dispersal orders because [redacted], [redacted], and [redacted] stated that the dispersal orders at locations 1 and 2 did not instruct the group to leave the campus. Because of these reasons, the Panel determined it was more likely than not that Kupsh did not engage in a violation of Section 102.16 (Failure to Comply).

Therefore, for the reasons listed above, the Panel found that there was Insufficient Information to find by a preponderance standard that Kupsh violated Sections 102.13 (Obstruction or Disruption), 102.14 (Disorderly Behavior), 102.15 (Disturbing the Peace), and 102.16 (Failure to Comply) of the *UCLA Student Conduct Code.*

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EXHIBIT R

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University of California, Los Angeles
Student Conduct Committee Hearing Report
In re: Dylan Kupsh

I. Allegations

In a letter dated June 12, 2025, Assistant Dean of Students, Bryan Murotake (Dean Murotake), notified student Dylan Kupsh (Kupsh) that Kupsh was being charged with allegedly violating the *UCLA Student Conduct Code,* Section 102.16 (Failure to Comply):

> "Specifically, it has been reported that on February 12, 2025, the student group Graduate Students for Justice in Palestine (GSJP), for which you serve as a signatory for, received notice that the student group was placed on Interim Suspension, resulting in the student group ceasing in all activities. It is reported that on February 18, 2025, GSJP promoted and participated in an unauthorized event that took place on campus on or around Royce Quad. Specifically, it was reported the GSJP promoted the event on Instagram with the language 'We will meet at Royce Quad at 2:00 PM on Tuesday, Feb. 18 to make our voices heard. We hope to see you there.'"

II. The Hearing

A Hearing was held on January 20, 2026, to consider the allegations and determine whether, by a preponderance of the information presented, it was more likely than not that there was a violation by Kupsh.

The Student Conduct Committee Hearing Panel (Panel) was chaired by [redacted] and included [redacted] and [redacted]. All participants participated over Zoom.

Alex Dring served as the Hearing Administrator.

Assistant Dean of Students, Bryan Murotake (Dean Murotake), provided an overview of the case and was available to answer questions.

The accused student, Dylan Kupsh (Kupsh), participated in the Hearing.

Attorney, Amruta Trivedi, participated in the Hearing as Kupsh's Advisor.

[redacted], participated in the Hearing as Kupsh's Support Person.

UCLA Lecturer, [redacted] ([redacted]), participated in the Hearing as Kupsh's Witness 1.

Professor of Asian American Studies and Digital Humanities, [redacted] (Professor [redacted]), participated in the Hearing as Kupsh's Witness 2.

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This report summarizes the findings of the Panel in regards to this case, and the information presented which the Panel found significant to their findings. This report does not represent a transcript of the Hearing proceedings.

Per Section III.K.9 of the *Code*, access to the full audio recording of the Hearing will be provided to any student considering submitting a response to the Hearing report.

III. Findings

The Panel found that there was Insufficient Information to demonstrate by a preponderance standard that Kupsh violated Section 102.16 (Failure to Comply) of the *UCLA Student Conduct Code.*

IV. Information Presented

Bryan Murotake (Assistant Dean of Students and Dean Assigned to Case)

Dean Murotake provided an overview of the case. Dean Murotake explained that the Office of Student Conduct received a report on February 18, 2025, regarding a student group named Graduate Students for Justice in Palestine (GSJP), for which Kupsh served as a signatory. Dean Murotake shared that the report indicated that "GSJP promoted and participated in an unauthorized event that took place on campus on or around Royce Quad." Dean Murotake shared that it was reported that GSJP "promoted the event on Instagram with the language, 'We will meet at Royce Quad at 2 p.m. on Tuesday, February 18th, to make our voices heard. We hope to see you there.'"

Dean Murotake shared that GSJP received a notice from the Office of Student Conduct on February 12, 2025, which notified the student group that GSJP was placed on Interim Suspension, resulting in the student group ceasing in all activities. Dean Murotake stated:

> "As a signatory for the student group, and in accordance under the UCLA regulations on activities, registered campus organizations, and use of university properties, the regulations provide that authorized representatives of the student group 'assume full responsibility for the actions and activities of the organization' and 'assume individual responsibility along with the organization for the planning and conduct of organization's activities.'"

Dean Murotake shared that Student Affairs Mitigator, Chett Miller (SAM Miller), shared that SAM Miller was made aware of a "planned campus activity" that was to take place on February 18, 2025, at 2:00 P.M., at Royce Quad. Dean Murotake shared that SAM Miller indicated that a post on Instagram from the GSJP account and Students Justice for Palestine (SJP), was made regarding an event on February 18, 2025.

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Dean Murotake met with Kupsh on March 12, 2025, to discuss the allegations. Kupsh shared the following with Dean Murotake:

> Kupsh shared that it was "unfair" if the Office of Student Conduct "withheld" or excluded any documentation regarding the posting of TPM policy.
>
> Kupsh shared that it was "unfair" for the Office of Student Conduct to create a case without sufficient evidence about Kupsh's personal involvement with the alleged incident.
>
> Kupsh noted that the Daily Bruin article that was written about the alleged incident notes that the event was organized by other groups – not SJP of GSJP.
>
> Kupsh shared that the Office of Student Conduct's use of the Daily Bruin article to assign blame to Kupsh is an "act of anti-Palestinian racism" based on "affiliation or affirmation" of Palestinian identity and rights.
>
> Kupsh shared that Kupsh was "being held to a policy" that was no longer in effect. Dean Murotake noted that the policy alleged to have been violated was an interim policy, specifically, *UCLA Regulations on Activities, Registered Campus Organizations, and Use of Properties*, was in effect during the period of the reported incident.
>
> Dean Murotake clarified that the Interim UCLA Policy 852: *Public Expression Activities* was active and in effect during the alleged incident.
>
> Kupsh shared that the "current" TPM policies (UCLA Policy 852: *Public Expression Activities*) did not address the issues for which Kupsh was being charged.

Dean Murotake met with Kupsh on April 10, 2025, to discuss the allegations. Dean Murotake shared with Kupsh that the UCLA regulations that were described in Dean Murotake's previous meeting with Kupsh were still in place; specifically, the regulations stated that the TPM regulations that were included on the Student Organizations Leadership & Engagement (SOLE) website were partly superseded by interim UCLA TPM policies. Dean Murotake shared that the portions of these regulations related to the registration and operation of registered campus organizations were under review, however, and remained in effect, according to the language of the policy.

Dean Murotake met with SOLE Associate Director Kris Kaupalolo (Kaupalolo) on May 29, 2025, to discuss the allegations. Kaupalolo shared the following with Dean Murotake:

> Kaupalolo shared that Kaupalolo was the SOLE Advisor for SJP and GSJP.
>
> Kaupalolo defined a signatory as an authorized representative of a UCLA Registered Student Organization (RSO). Kaupalolo shared that signatories could be students, faculty, or staff.

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Kaupalolo shared that signatories' duties include "speaking for" the organization, reserving rooms and spaces for events, and "taking on responsibility" for the student organization.

Kaupalolo shared that training was required for new signatories in RSOs which consisted of attending a workshop hosted by the SOLE office. Kaupalolo shared that TPM policies were materials that are reviewed in RSO training.

Kaupalolo provided an example from the individual signatory agreement, which stated:

> "As a signatory, I agree to act as the authorized representative for the organization regarding the activities of the registered organization, and I understand that notice to any one of the signatories serves as notice to the registered organization. I also agree to abide by the UCLA regulations on activities, registered campus organizations, and use of university properties."

Kaupalolo provided Kupsh's signed signatory agreement with an approval date of October 29, 2024.

In response to questions from the Panel, Dean Murotake shared the following:

Dean Murotake shared that Dean Murotake was notified by SAM Miller regarding the event on February 18, 2025.

Dean Murotake shared that SAM Miller shared a screenshot of an Instagram post regarding the event on February 18, 2025, and noted that the post was from the SJP Instagram account. Dean Murotake noted that GSJP was not the Instagram account in the screenshot.

Dean Murotake shared that the Interim Suspension letter for GSJP did not specifically state "use of social media" as a specific prohibited action or activity.

In response to questions from Kupsh, Dean Murotake shared the following:

Dean Murotake shared that Dean Murotake was aware that SJP and GSJP were separate organizations with different signatories.

Dean Murotake shared that Dean Murotake did not have any information to confirm that Kupsh was present at the event on February 18, 2025.

Dean Murotake shared that Dean Murotake had no information regarding the connection between the GSJP Instagram account and the GSJP RSO.

Dean Murotake shared that Dean Murotake had no information regarding the connection between the SJP Instagram account and the GSJP RSO.

Dean Murotake shared that the Daily Bruin article that was included in the Hearing packet does not mention Kupsh, and noted that the article does not state that SJP or GSJP were organizers of the event on February 18, 2025.

Dean Murotake shared it was reported that UC Divest Coalition at UCLA, Faculty for Justice in Palestine at UCLA, National Students for Justice in Palestine, People's City Council, and the Southern California Regional Formation of the International League of People's Struggle "announced the protest in a joint Instagram post."

Dean Murotake shared that Dean Murotake did not have information regarding Kupsh having "control or access to" the GSJP Instagram account.

UCLA Lecturer, [redacted] (Presentation from Kupsh's Witness 1)

[redacted] shared that [redacted] could recognize Kupsh from shared time in "union work" at UCLA.

[redacted] shared that [redacted] was aware that GSJP was no longer a RSO at UCLA.

[redacted] shared that [redacted] was aware of the Notice of the Interim Suspension for GSJP.

[redacted] shared that the "rally" on February 18, 2025, was not organized by GSJP or SJP.

[redacted] shared that [redacted] learned about the rally from the People's City Council and the UC People's Tribunal Instagram accounts.

[redacted] shared that [redacted] attended the rally on February 18, 2025. [redacted] shared that [redacted] did not observe the distribution of "GSJP literature" at the rally. [redacted] shared that none of the speakers at the rally introduced themselves as being affiliated with membership in GSJP. [redacted] shared that [redacted] was present during the entirety of the rally.

[redacted] shared that [redacted] did not observe Kupsh at the rally on February 18, 2025.

In response to questions from Kupsh, [redacted] shared the following:

- [redacted] shared that [redacted] was present at the rally on February 18, 2025.
- [redacted] shared that the rally on February 18, 2025, was not organized by GSJP or SJP.
- [redacted] shared that [redacted] did not observe Kupsh at the rally on February 18, 2025.

Professor of Asian American Studies, [redacted] (Presentation from Kupsh's Witness 2)

Professor [redacted] stated that Professor [redacted] was present at the rally on February 18, 2025.

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Professor [redacted] shared that GSJP did not organize the rally on February 18, 2025. Professor [redacted] shared that the rally was "held and promoted by 154 other organizations to raise awareness about an ongoing genocide and to express solidarity with two student organizations."

Professor [redacted] shared that Kupsh resigned as a signatory from GSJP.

Professor [redacted] shared that Professor [redacted] learned about the rally on February 18, 2025, from "dozens of Instagram posts and story shares" from Instagram accounts that were not SJP or GSJP Instagram accounts.

Professor [redacted] shared that Professor [redacted] was not invited to the rally on February 18, 2025, by anyone in SJP or GSJP.

Professor [redacted] shared that Professor [redacted] did not observe the distribution of GSJP literature at the rally. Professor [redacted] shared that no speakers at the rally introduced themselves as being from SJP or GSJP.

Professor [redacted] shared that Professor [redacted] did not observe Kupsh at the rally on February 18, 2025.

In response to questions from the Panel, Professor [redacted] shared the following:

> Professor [redacted] shared that Professor [redacted] was not aware of the exact date of Kupsh's resignation from being a signatory for GSJP.

In response to questions from Kupsh, Professor [redacted] shared the following:

> Professor [redacted] stated that Professor [redacted] was present at the rally on February 18, 2025.
>
> Professor [redacted] shared that Professor [redacted] did not observe Kupsh at the rally on February 18, 2025.

Dylan Kupsh (Presentation from the Accused Student)

Kupsh stated, "I believe I did not fail to comply with any directives of the University officials, especially in relations to the protests that took place on February 18."

Kupsh shared that the TPM policy that Dean Murotake cited when meeting with Kupsh was "replaced and superseded by the new TPM policy."

Kupsh shared that the public-online documentation regarding the new TPM policy was not accessible during the time of the alleged incident and was not was not accessible during the initial meeting with Dean Murotake and Kupsh.

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Kupsh shared that the rally on February 18, 2025, was not organized by GSJP. Kupsh shared that the rally was organized by other groups seeking to support GSJP.

Kupsh shared that the Daily Bruin article in the Hearing packet indicates that student organizations other than GSJP and SJP organized the rally on February 18, 2025.

Kupsh shared that Kupsh was teaching during the entire duration of the event on February 18, 2025. Kupsh shared that Kupsh was attending Kupsh's scheduled office hours during the duration of the event.

Kupsh shared that Kupsh did not have control to the GSJP Instagram account. Kupsh shared that Kupsh did not know who operated the GSJP Instagram account.

In response to questions from the Panel, Kupsh shared the following:

> Kupsh shared that Kupsh did not know who operated the GSJP Instagram account.
>
> Kupsh shared that Kupsh was not able to locate the Instagram post from GSJP regarding the event on February 18, 2025.
>
> Kupsh shared that the members of GSJP were made aware of the Interim Suspension, because Kupsh shared the notice of the Interim Suspension in a group chat with the members of GSJP.
>
> Kupsh shared that the last time Kupsh posted on Instagram was "approximately in 2022."
>
> Kupsh shared that Kupsh never posted on the GSJP Instagram account.
>
> Kupsh shared that the communication amongst members of GSJP is facilitated in a group chat. Kupsh shared that communication within the group chat ceased after the Interim Suspension was issued.
>
> Kupsh shared that Kupsh was aware of the GSJP Instagram account while Kupsh was a signatory for GSJP.
>
> Kupsh shared that Kupsh did not consider the GSJP Instagram account as a method of communicating "with the general public."

V. Analysis

The Panel reviewed the information from the Hearing packet and the statements presented by Dean Murotake, Malabre, Assistant Professor Joudah, and Kupsh during the Hearing, in making their findings regarding the allegations.

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102.16: Failure to Comply

Failure to identify oneself to, or comply with directions of, a University official or other public official acting in the performance of one's duties while on University property or at official University functions, or resisting or obstructing such University or other public officials in the performance of or the attempt to perform their duties.

The Panel referred to these definitions of the prohibited behavior in determining whether they believe Kupsh's behavior constituted a violation.

In particular, the Panel focused on the following:

The Panel reviewed Dean Murotake's presentation; specifically, Dean Murotake shared that Dean Murotake did not have any information to confirm that Kupsh was present at the event on February 18, 2025. Additionally, the Panel reviewed [redacted]'s presentation; specifically, [redacted] shared that [redacted] did not observe Kupsh at the rally on February 18, 2025. The Panel reviewed Professor [redacted]'s presentation; specifically, Professor [redacted] shared that Professor [redacted] did not observe Kupsh at the rally on February 18, 2025. Additionally, the Panel reviewed Kupsh's presentation; specifically, Kupsh shared that Kupsh was teaching during the entire duration of the event on February 18, 2025. Kupsh shared that Kupsh was attending Kupsh's scheduled office hours during the duration of the event.

The Panel reviewed the Daily Bruin article included in the Hearing packet; specifically, the Panel noted that the article did not list GSJP or SJP as organizers of the event on February 18, 2025. Additionally, the Panel reviewed Dean Murotake's presentation; specifically, Dean Murotake shared that the Daily Bruin article that was included in the Hearing packet does not mention Kupsh, and Dean Murotake noted that the article does not state that SJP or GSJP were organizers of the event on February 18, 2025. The Panel reviewed [redacted]'s presentation; specifically, [redacted] shared that [redacted] learned about the rally from the People's City Council and the UC People's Tribunal Instagram accounts. Additionally, the Panel reviewed Professor [redacted]'s presentation; specifically, Professor [redacted] shared that Professor [redacted] learned about the rally on February 18, 2025, from "dozens of Instagram posts and story shares" from Instagram accounts that were not SJP or GSJP Instagram accounts.

The Panel reviewed [redacted]'s presentation; specifically, [redacted] shared that [redacted] attended the rally on February 18, 2025. [redacted] shared that [redacted] did not observe the distribution of GSJP literature at the rally. [redacted] shared that none of the speakers at the rally introduced themselves as having membership in GSJP. [redacted] shared that [redacted] was present during the entirety of the rally. Additionally, the Panel reviewed Professor [redacted]'s presentation; specifically, Professor [redacted] shared that Professor [redacted] did not observe the distribution of GSJP literature at the rally. Professor [redacted] shared that no speakers at the rally introduced themselves as having membership in GSJP.

The Panel reviewed Dean Murotake's presentation; specifically, Dean Murotake shared that Dean Murotake had no information regarding the connection between the GSJP Instagram account and the GSJP RSO.

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The Panel considered that, according to information Dean Murotake shared from Kaupalolo, Kupsh may "[take] on responsibility" for violations of the Interim Suspension of GSJP, according to the signatory agreement signed by Kupsh; however, the Panel concluded that there was insufficient information to determine that Kupsh failed to comply with the directions of a University official by GSJP not complying with the interim measures, because the Panel did not find enough information was presented during the Hearing or included in the Hearing packet that showed Kupsh or GSJP were organizers or planners of the event on February 18, 2025.

The Panel noted that [redacted] and Professor [redacted] stated that they did not observe Kupsh at the event on February, 18, 2025, and Kupsh stated Kupsh was not present during the event. The Panel also determined that there was Insufficient information to determine that Kupsh was a participant at the event on February 18, 2025.

The Panel also concluded that there was insufficient information to determine that the GSJP Instagram account was managed by, monitored by, or otherwise used by Kupsh or the GSJP RSO; specifically, the Panel shared that Dean Murotake stated during Dean Murotake's presentation that there was no information regarding the connection between the GSJP RSO and the GSJP Instagram account. Additionally, Kupsh stated during Kupsh's presentation that while Kupsh was "aware" of the GSJP Instagram account, Kupsh did not manage the account nor post on the account.

Therefore, for the reasons listed above, the Panel found that there was Insufficient Information to find by a preponderance standard that Kupsh violated Section 102.16 (Failure to Comply) of the *UCLA Student Conduct Code.*

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EXHIBIT S

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University of California, Los Angeles
Student Conduct Committee Hearing Report
In re: Dylan Kupsh

I. Allegations

In a letter dated June 6, 2025, Assistant Dean of Students, Bryan Murotake (Dean Murotake), notified student Dylan Kupsh (Kupsh) that he was being charged with allegedly violating the UCLA *Student Conduct Code,* Sections 102.07 (Violations of University Policy) [in reference to UCLA's Policy 850: General Use of UCLA Property and Policy 852: UCLA Interim Policy 852: Public Expression Activities], 102.13 (Obstruction or Disruption), 102.14 (Disorderly Behavior) and 102.16 (Failure to Comply):

> "Specifically…it is alleged that on or around May 15, 2025, near or around Dickson Court North, at approximately 11:57 a.m., you were part of a group that was using a small speaker and microphone system and several bullhorns. It is further reported that around 12:25 p.m., the group continued to use amplified sound and UCLA Student Affairs Mitigators (SAMs) requested that the group cease using amplified sound or relocate to a designated area for public expression.
>
> Additionally, it is reported the group moved near Royce Quad and resumed using amplified sound, hanging banners from trees and erecting a structure described as a 'Yaffa.' It is also reported that the group moved from Janss Steps and gathered in front of the Luskin Conference Center, where the group continued to hang banners. It is also reported, that you were observed by SAMs engaging in delay tactics, such as placing yourself in front of SAMs, walking slowly to impede progress and repeatedly asking questions in an apparent attempt to distract or delay. Lastly, it is reported that you failed to present student identification upon request."

II. The Hearing

A Hearing was held on October 22, 2025, to consider the allegations and determine whether, by a preponderance of the information presented, it was more likely than not that there was a violation by Kupsh.

A Hearing was held on November 5, 2025, to consider the allegations and determine whether, by a preponderance of the information presented, it was more likely than not that there was a violation by Kupsh.

The Student Conduct Committee Hearing Panel (Panel) was chaired by [redacted] and included [redacted] and [redacted]. All participants participated over Zoom.

Dessiree Cuevas served as the Hearing Administrator.

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Assistant Dean of Students, Bryan Murotake (Dean Murotake), provided an overview of the case and was available to answer questions.

The accused student, Dylan Kupsh (Kupsh), participated in the Hearing.

Zoha Khalili participated in the Hearing as Kupsh's Advisor.

[redacted] participated in the Hearing as Kupsh's Support Person.

Will Alden participated in the Hearing as Kupsh's Support Person.

UCLA Undergraduate Student, Nare Aghadjanian (Aghadjanian), participated in the Hearing as Kupsh's Witness 1.

Ben Gharagozli (Gharagozli), participated in the Hearing as Kupsh's Witness 2.

Professor and Chair, [redacted], participated in the Hearing as Kupsh's Witness 3.

UCLA Lecturer, [redacted], participated in the Hearing as Kupsh's Witness 4.

UCLA Alumnus, [redacted], participated in the Hearing as Kupsh's as Witness 5.

UCLA Alumnus, [redacted], participated in the Hearing as Kupsh's Witness 6.

Professor [redacted] (Professor [redacted]) participated in the Hearing as Kupsh's Witness 7.

UCLA Undergraduate Student, [redacted], participated in the Hearing as Kupsh's Witness 8.

This report summarizes the findings of the Panel in regards to this case, and the information presented which the Panel found significant to their findings. This report does not represent a transcript of the Hearing proceedings.

Per Section III.K.9 of the *Code*, access to the full audio recording of the Hearing will be provided to any student considering submitting a response to the Hearing report.

III. Findings

The Panel found that there was Insufficient Information to demonstrate by a preponderance standard that Kupsh violated Sections 102.07 (Violations of University Policy) [in reference to UCLA's Policy 850: General Use of UCLA Property and Policy 852: UCLA Interim Policy 852: Public Expression Activities], 102.13 (Obstruction or Disruption), and 102.14 (Disorderly Behavior) of the *UCLA Student Conduct Code.*

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The Panel found that there was Sufficient Information to demonstrate by a preponderance standard that Kupsh violated Section 102.16 (Failure to Comply) of the *UCLA Student Conduct Code.*

IV. Information Presented

Bryan Murotake (Assistant Dean of Students and Dean Assigned to Case)

Dean Murotake provided an overview of the case. He explained that the Office of Student Conduct received a referral from Student Affairs Mitigator Chet Miller (Miller) on May 15, 2025. Dean Murotake stated that Miller reported that Miller and Student Affairs Mitigator Chloe Gamboa (Gamboa) "approached a group of individuals gathered on the north side of Dixon Court to talk about potential violations of UCLA's Interim Policy 850, General Use of UCLA property and Interim Policy 852, Public Expression Activities." The report explained that the "group was using a small speaker and a microphone system and several bullhorns."

Miller shared that he explained the Time, Place and Manner policy to about 8-10 individuals. Dean Murotake stated that TPM policy "outlines designated areas on campus where amplified sound is permitted for expressive activities." Dean Murotake stated that Miller explained that amplified sound is allowed from "12 p.m. to 1 p.m. in Dixon Court South of Janss Steps and throughout the day at Meyerhoff Park and Bruin Plaza expect from 12 a.m. to 6 a.m." Miller said, "These areas are generally available unless reserved for scheduled events."

The report stated that the "the group was advised not to use Bruin Plaza due to a concurrent event occurring there." Miller explained that he and Gamboa addressed questions about the TPM policies, "including inquiries regarding disruptions, the resetting of TPM requirements when moving locations, and other aspects related to expressive activity matters." Dean Murotake shared that Miller shared that he spoke to Professor [redacted] and noted that Professor Hong "offered to help communicate with the students and on-site administrators."

Miller stated that the SAMs "reiterated which areas permitted amplified sound use for expressive purposes." The report explained that the group was playing music through a sound system. Dean Murotake shared that Miller stated that the group "grew in size" and "there were about 40 to 50 individuals present." Miller noted that public safety advisors and UCPD officers "where there to address the continued use of amplified sound." Miller reported that the group was "using the sound system to speak to the crowd." Dean Murotake stated that Miller explained that he requested the group to "either cease using amplified sound or relocate to a designated area for public expressions." Miller noted that "when the group did not comply, SAMs began requesting identification from individuals using amplified sound."

Dean Murotake explained that Miller stated that he obtained identification from UCLA students who were using the sound equipment. Miller shared that the group complied and relocated to Dixon Court North. The report explained that the SAMs "withdrew" when the group cooperated and noted that the group size grew to about 75 to 100 individuals. Miller shared that group moved near Royce Quad. The report explained that the "the group resumed using amplified sound, hung banners from trees, and erected a structure described as a 'Yaffa.'"

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Dean Murotake shared that Miller reported that "6 to 8 individuals deliberately attempted to obstruct their efforts by placing themselves in front of SAMs [by] walking slowly to impede progress." The report stated that the 6 to 8 individuals were "repeatedly asking questions in an apparent attempt to distract or delay." Miller shared that the 6 to 8 individuals "claimed" to be UCLA students but "refused" to provide identification when requested. Miller said, "[Kupsh] used delayed tactics and failed to present student identification upon request." The report mentioned that after 10 minutes, the SAMs withdrew after "attempting to make contact and gain compliance" with the group. Dean Murotake explained that the report shared that the SAMs consulted with UCLA Student Affairs leadership and "the incident would be escalated to a Tier 2."

Dean Murotake stated that Miller explained that the group moved to Janss Steps and gathered in front of the Luskin Conference Center. The report shared that the group "hung additional banners" on plants at the Luskin Conference Center. Miller explained that around 1:30 p.m., the group began to disperse.

On June 24, 2025, Dean Murotake met with Gamboa. Dean Murotake shared the following statements provided by Gamboa:

> Gamboa stated that she was made aware of the "demonstration near or around Dixon Court North." Gamboa explained that she was accompanied by Miller and Dimitri Gean (Gean). Gamboa shared that she saw individuals moving items in a cart to Dixon Court North. Gamboa explained that she and Miller "watched from a distance."
>
> Gamboa stated that she and Miller connected with Vice Chancellor, Student Affairs, Monroe Gorden (VCSA Gorden), and noted that VCSA Gorden "instructed Gamboa and Miller to obtain identification of the students involved." Gamboa mentioned that she and Miller spoke with Professor Hong. Gamboa stated that Professor [redacted] had questions about the TPM policies. Gamboa explained that she and Miller "attempted to ID people, but were delayed getting to individuals using amplified sound." Gamboa shared that the amplified sound was coming from a megaphone. Gamboa stated that the "matter was elevated to a Tier 2."
>
> Gamboa shared that the group moved to Royce Quad. Gamboa explained that the police "engaged" with the group. Gamboa stated that "she [did] not recall any names of UCLA students involved in the incident." Gamboa explained that "when attempting to engage with individuals using amplified sound, she and [Miller] would be delayed by individuals in the group by being asked relevant questions." Gamboa shared that the group used bullhorns, megaphones and drums to make amplified sounds.
>
> Gamboa shared that the group was reciting chants. Gamboa stated that she saw banners hanging near the Royce Fountain. Gamboa explained that she and Miller spoke to the individuals that were using amplified sound near Dixon Court North. Gamboa noted that "she was unable to recall the name of the person" that created the amplified sound.

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On June 27, 2025, Dean Murotake met with Gean. Dean Murotake shared the following statements provided by Gean:

> Gean stated that the event took place at Dixon Court North and moved to Royce Quad. Gean shared that he saw Miller approach the group of individuals using amplified sound. Gean explained that "he did not engage with the group." Gean mentioned that it "was difficult to reach the individuals using amplified sound because SAMs [were] stonewalled by individuals asking question after question." Gean stated that Miller "was not able to get to the individuals using amplified sound."
>
> Gean noted that the Royce Fountain was dyed and banners were hung on the trees. Gean stated that "he was not able to identify any UCLA students as part of the crowd." Gean explained that Miller spoke to the individuals who were near Dixon Court North.

On July 2, 2025, Dean Murotake met with Miller. Dean Murotake shared the following statements provided by Miller:

> Miller stated that Dixon Court is a "common place for groups to congregate." Miller explained that about 8 to 10 individuals were using amplified sounds via a bullhorn and a drum. Miller shared that he and Gamboa "split into teams to monitor the situation." Miller stated that UCPD was also monitoring the area. Miller shared that "when he approached the initial group of individuals, he informed them that they could move to Dixon Court South, where amplified sound is allowed from 12:00 p.m. to 1:00 p.m."
>
> Miller explained that he was "instructed" by VSCA Gorden to ask for identification and to inform the group to "move to a designated area." Miller stated that the group did not provide their identification to him. Miller mentioned that the group moved to Royce Quad. Miller shared that he saw the fountain being dyed. Miller explained that he spoke with Professor Hong. Miller stated that Professor [redacted] asked questions about the TPM policy. Miller "described his interaction with Professor [redacted] as obstructing SAMs from obtaining identification."
>
> Miller reported that Kupsh "obstructed SAMs from getting to individuals using amplified sound by placing himself in front of SAMs and asking questions." Miller shared that he asked Kupsh for his ID, "but [Kupsh] did not provide his ID." Miller explained that he "recognized [Kupsh] from previous interactions." Miller noted that he did not know the "the identity of any UCLA students who dyed the fountain, planted the tree, or erected a small brick structure." Miller shared that the incident was elevated to a Tier 2.

On July 10, 2025, Dean Murotake met with Kupsh. Dean Murotake explained that Kupsh did not share any information. Dean Murotake shared that he submitted questions to Kupsh and noted that Kupsh did not answer the questions. Dean Murotake stated that he informed Kupsh that his conduct case was an individual case and not a group case. Dean Murotake shared the following statements provided by Kupsh:

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Kupsh asked Dean Murotake if "it was a violation of the *UCLA Student Conduct Code* to ask questions, walk slowly, or being in the general direction of a university official." Dean Murotake responded to Kupsh's questions and said, "No." Kupsh asked Dean Murotake "whether the student conduct charges have to be a specific action on the student as an individual." Dean Murotake responded to Kupsh's questions and said, "The charges have to be for a specific action on the student as an individual."

Kupsh stated that he did not violate Sections 102.07 (Violations of University Policy) [in reference to UCLA's Policy 850: General Use of UCLA Property and Policy 852: UCLA Interim Policy 852: Public Expression Activities], 102.13 (Obstruction or Disruption), 102.14 (Disorderly Behavior) and 102.16 (Failure to Comply)."

On September 3, 2025, Dean Murotake met with Professor [redacted]. Dean Murotake shared the following statements provided by Professor Hong:

Professor [redacted] stated that she was not present when Miller "spoke to the students about moving to a different location or direction." Professor [redacted] shared that she remembered that Miller asked the students for their identification. Professor [redacted] explained that "some" students provided their IDs and some did not.

Professor [redacted] stated that the group moved to Royce Quad. Professor [redacted] explained that the group "was not blocking anyone's path and not putting anyone in harm's way." Professor [redacted] shared that the group was "not impeding any classes." Professor [redacted] stated that "some individuals were using megaphones, but she did not know the identity of the users." Professor [redacted] said, "The megaphone did not amplify loudly." Professor [redacted] noted that the megaphones were not facing the classrooms.

Professor [redacted] shared that the group was "not loud enough to disrupt the Royce Hall classes." Professor [redacted] stated that there was no dispersal order. Professor Hong explained that the group moved to Janss Steps. Professor [redacted] noted that Kupsh served as a "student liaison between the demonstrators, the Student Affairs staff, campus security, and police, as needed." Professor [redacted] explained that she did not "see any of the students using amplified sound, hanging banners, or erecting structures, or otherwise impeding university activities." Professor [redacted] mentioned that the group did "not obstruct the work of Student Affairs staff."

Professor [redacted] reiterated that Kupsh was serving as a "student liaison." Professor [redacted] stated that she saw Miller "give [Kupsh] and other students information which they conveyed to other members of the group." Professor [redacted] explained that she saw Kupsh and other students ask Miller "questions to clarify confusing information or directives to ensure that the information being conveyed was accurate."

In response to questions from the Panel, Dean Murotake shared the following:

Dean Murotake stated that Miller shared that the group was asking him relevant questions about the TPM policy.

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In response to questions from Kupsh, Dean Murotake shared the following:

Dean Murotake confirmed that this was an individual student conduct case.

Dean Murotake shared that Professor [redacted] explained that she attended the event to help the students "facilitate conversations between Student Affairs Mitigators."

Dean Murotake reiterated that Gean shared that he was "not able to identify any UCLA students as a part of the crowd, and that SAM Miller was the one who spoke with individuals near Dixon Court." Dean Murotake noted that Gamboa explained that she was "was not able to identify any UCLA students, including [Kupsh]." Dean Murotake shared that Miller was the only one that identified Kupsh.

Dean Murotake stated that Kupsh is not seen in the pictures that Miller submitted. Dean Murotake shared that during his review, he did not learn that Kupsh "was a part of this crowd" and did not learn that Kupsh was "using amplified sound." Dean Murotake stated that during his review, he learned that Kupsh was present on May 15, 2025, and Kupsh did not provide his ID to Miller.

Dean Murotake explained that during his review, he "did not learn from any of the witnesses that [Kupsh] was using any amplified sound, or erecting any structure, or hanging any banners."

Dean Murotake stated that there was no information in Kupsh's Hearing Packet that Kupsh assembled an unauthorized structure.

Dean Murotake read Section 102.16 (Failure to Comply).

Dean Murotake stated that the Student Conduct Code does not have a policy regarding if students are required to carry identification on them.

Dean Murotake shared that Section 102.16 (Failure to Comply) "doesn't specifically state" that an individual "needs to furnish an ID."

Dean Murotake noted that he did not receive any information during his review that Kupsh was "wearing a disguise." Dean Murotake shared that Miller stated that Miller was able to identify Kupsh.

Dean Murotake stated that Miller explained that Miller was able to identify Kupsh from "previous interactions."

[redacted] (Presentation from Kupsh's Witness 1)

[redacted] stated that she was present on May 15, 2025. [redacted] explained that she saw Kupsh "at the demonstration." [redacted] shared that she and Kupsh were standing "at the

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edge of the crowd." [redacted] said, "Miller came and began taking pictures of students' Bruin Cards while at Dixon Court." [redacted] noted that the group moved to a different location. Aghadjanian stated that she saw Kupsh speaking with Miller. [redacted] shared that Miller "kept doing their job of relaying information to the students" and Kupsh. [redacted] mentioned that Kupsh was asking "clarifying questions" to Miller.

[redacted] said, "[Kupsh] never seemed to be fully integrated with the crowd." [redacted] stated that Kupsh "was never near the people participating in [the] activity." [redacted] explained that "no one's access to anything was ever blocked." [redacted] shared that individuals were able to walk around at Royce Quad.

Ben Gharagozli (Presentation from Kupsh's Witness 2)

Gharagozli provided legal definition of California state laws.

[redacted] (Presentation from Kupsh's Witness 3)

Professor [redacted] stated he was present on May 15, 2025. Professor [redacted] explained that on his way "to the demonstration," he was not able to "hear anything." Professor [redacted] shared that he saw Kupsh and noted that "Kupsh was an observer rather than a participant in the protest." Professor [redacted] explained that Kupsh "did not use any kind of sound amplifier, nor did [Kupsh] participate in the protest chants." Professor [redacted] said, "[Kupsh] held no banners, erected no flags, built no structures."

Professor [redacted] stated that Kupsh "is widely known to the administrations and [SAMs]." Professor [redacted] shared that Kupsh was "was not trying to hide or to disguise himself." Professor [redacted] explained that Kupsh was asking SAMs questions and relaying the information to the group. Professor [redacted] reiterated that Kupsh did not "engage in using amplified sound or disrupting campus activities."

In response to questions from Kupsh, Professor [redacted] shared the following:

> Professor [redacted] stated that there was room for individuals to walk around in Royce Quad. Professor [redacted] shared that Kupsh did not control Professor [redacted]'s actions.
>
> Professor [redacted] explained that Kupsh was not wearing a disguise. Professor [redacted] noted that the SAMs were able to identify Kupsh.
>
> Professor [redacted] shared that Kupsh was not blocking or stopping university officials from doing their job.
>
> Professor [redacted] stated that Kupsh did not violate the Time, Place, and Manner policies or the Student Conduct Code.
>
> Professor [redacted] shared that he only carries his Bruin Card when going to the library.

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[redacted] (Presentation from Kupsh's Witness 4)

[redacted] stated that he was present on May 15, 2025. [redacted] shared that when he was walking towards the demonstration, he "could not hear the protest until [he] was within the grasp of Dixon Court North." [redacted] explained that the group had a "small megaphone." [redacted] stated that he "did not see [Kupsh] use amplified sound." [redacted] said, "I did not see [Kupsh] erect any structure, or place any banner, or otherwise violate any university policy." [redacted] shared that he "did not see [Kupsh] do anything that could be taken as obstruction or a disruption."

[redacted] stated that he "did not see [Kupsh] fail to comply with any orders." [redacted] explained that he did not see university officials "give any orders to [Kupsh] or the group as a whole." [redacted] shared that Kupsh did not engage in disorderly behavior. [redacted] noted that Kupsh was "observing from the outside or the crowd." [redacted] said, "I did not see him participate in the protest. I never saw him join in chanting or raise his voice."

[redacted] explained that he heard Sergeant Harry Standberry and Miller share that "they had received no complain of any disruption." [redacted] shared that he saw Miller ask one student for her ID. [redacted] shared that he did not see Miller "ask others for their IDs." [redacted] explained that the group moved to Royce Quad. [redacted] explained that he spoke with Associate Vice Chancellor for Campus and Community Safety, Steve Lurie, and noted that AVC Lurie explained that "his office had received no complaint."

[redacted] stated that AVC Lurie shared that "amplified sound could cause a disruption." [redacted] explained that he asked AVC Lurie if the police had a "decibel meter," and AVC Lurie said, "No." [redacted] shared that he saw Kupsh and Professor [redacted] ask Miller questions. [redacted] said, "They were walking alongside [Miller] and not obstructing him in any way, shape, or form." [redacted] stated that Kupsh, Professor [redacted], and Miller's conversation was about five minutes. [redacted] noted that Miller was not obstructed. [redacted] said, "I did not witness [Kupsh] violating any of the policies he is accused of violating."

In response to questions from Kupsh, [redacted] shared the following:

> [redacted] stated that Kupsh did not control [redacted]'s actions. [redacted] explained that there was space for people to "walk around the group." [redacted] shared that there was space for people to "walk around" in Royce Quad.
>
> [redacted] explained that Kupsh was not wearing a disguise and was "easily identifiable." [redacted] noted that university officials were addressing Kupsh by Kupsh's first name.
>
> [redacted] shared that Kupsh was not blocking or stopping university officials from doing their job.
>
> [redacted] stated that Kupsh did not violate the Time, Place, and Manner policies or the Student Conduct Code.
>
> [redacted] shared that he was not currently carrying his Bruin ID.

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[redacted] (Presentation from Kupsh's Witness 5)

[redacted] stated that he was present on May 15, 2025. [redacted] said, "I've never seen [Kupsh] engage in disturbing the peace, disorderly behavior, obstruction or disruption, failure to comply, or any of the other various things he's accused of." [redacted] shared that Kupsh was "standing quietly at the edge of the rally." [redacted] explained that Kupsh was serving as "the police and administrative liaison." [redacted] said, "[Kupsh] never directed me or anyone else to do anything."

[redacted] stated that Kupsh was "easily recognizable," and was not "wearing any disguise or anything to hide his identity." [redacted] shared that "administration officials were able to clearly identify him." [redacted] explained that the group was not "blocking any walkways." Racioppo shared that the group was not loud. [redacted] stated that Kupsh did not "prevent the [SAMs] from doing their jobs." [redacted] noted that he saw Miller and Kupsh speak. [redacted] shared that "there was plenty of space that [Miller] could have walked around."

In response to questions from the Panel, [redacted] shared the following:

> [redacted] stated that he saw the interaction between Miller and Kupsh. [redacted] noted that Miller knew who Kupsh was. [redacted] said, "I think that when you call somebody by their first name, you know [Kupsh] was identified."

In response to questions from Kupsh, [redacted] shared the following:

> [redacted] stated that Kupsh was "not obstructing anyone."
>
> [redacted] shared that Kupsh was not wearing a disguise and university officials were able to identity Kupsh.
>
> [redacted] explained that university officials were able to walk around Kupsh.
>
> [redacted] stated that Kupsh did not violate the Time, Place, and Manner policies or the Student Conduct Code.
>
> [redacted] explained that when he was a student, he did not carry his Bruin ID.

[redacted] (Presentation from Kupsh's Witness 6)

[redacted] stated he was present on May 15, 2025. [redacted] shared that he spoke with the SAMs and VCSA Gorden. [redacted] explained that he "witnessed the conversations that [Kupsh] had with the [SAMs]." [redacted] stated that Kupsh was on "the sidelines." [redacted] explained that Kupsh did not "hold a microphone or megaphone." [redacted] shared that the group did not block the movement in Royce Quad or Dixon Court North. [redacted] explained that he saw "administration and members of UCPD freely move in and out of the space where students were exercising their freedom to assemble."

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[redacted] stated that the SAMs' response was "very unclear" and "led [to] too much confusion." [redacted] noted that he saw Kupsh and Miller speak "to clarify the administration's response." [redacted] explained that he heard Kupsh ask questions "about next steps and identification concerns." [redacted] said, "I was also in a conversation with [Miller] and SAMs representatives, and they could not clarify what would happen if people did not have their identification." [redacted] stated that Miller referred to Kupsh by his name during their conversation. [redacted] noted "it was not difficult" for Miller to identity Kupsh. [redacted] stated that Kupsh did not "impede [the] movements" of the SAMs.

In response to questions from Kupsh, [redacted] shared the following:

> [redacted] stated that there was "ample room" at Royce Quad. [redacted] shared that Kupsh did not control [redacted]'s actions. [redacted] explained that SAMs and UCPD "were perfectly able to act independently of [Kupsh]."
>
> [redacted] reiterated that university officials were able to identify Kupsh.
>
> [redacted] explained that Kupsh did not once impede the SAMs' movement. [redacted] stated that Kupsh was asking questions to the SAMs.
>
> [redacted] stated that Kupsh did not violate the Time, Place, and Manner policies or the Student Conduct Code.
>
> [redacted] shared that he was not carrying his Bruin ID.

Professor [redacted] (Presentation from Kupsh's Witness 7)

Professor [redacted] stated that she was present on May 15, 2025. Professor [redacted] shared that she saw the interaction between Kupsh and the SAMs. Professor [redacted] explained that she did not see Kupsh "use amplified sound or play music, block anyone's way, erect structures, hang banners, damage university property, or obstruct or impede university officials or activities." Professor [redacted] said, "I never saw [Kupsh] refuse to comply with student affairs staff or prevent them from delivering advisements." Professor [redacted] stated that Kupsh "acted as a liaison between student demonstrators and student affairs staff."

Professor [redacted] explained that Kupsh was "on the sidelines" of the demonstration. Professor [redacted] stated that "all of the questions that [Kupsh] asked were intended to facilitate communications between Student Affairs Officers and students to ensure safety." Professor [redacted] explained that Miller was "in constant communication with [Kupsh]." Professor [redacted] shared that the SAMs gave "conflicting and confusing directives and information." Professor [redacted] said, "When the protest started, the amplified sound was not very loud, since those who were speaking were only using handheld megaphones." Professor [redacted] explained that the group was facing away from Perloff Hall.

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Professor [redacted] stated that she saw Miller asking students from their IDs. Professor [redacted] shared that Miller stated that he was asking the students for their IDs "to prove that they were UCLA students." Professor [redacted] explained that she asked Miller "what would happen if they didn't show their IDs or didn't have their IDs with them." Professor [redacted] shared that Miller stated that individuals without their IDs would be under the jurisdiction of the police. Professor [redacted] explained that the group moved to Royce Quad. Professor [redacted] noted that there was not a dispersal order.

In response to questions from Kupsh, Professor [redacted] shared the following:

> Professor [redacted] stated that Kupsh did not control Professor [redacted]'s actions. Professor Hong shared that there was space in Royce Quad for people to walk around.
>
> Professor [redacted] explained that Kupsh was not wearing a disguise and noted that Kupsh was recognized by AVC Lurie and Sergeant Standberry.
>
> Professor [redacted] stated that Kupsh was not stopping the SAMs from doing their job.
>
> Professor [redacted] shared that Kupsh did not violate the Time, Place, and Manner policies or the Student Conduct Code.
>
> Professor [redacted] stated that she was not carrying her Bruin ID.

[redacted] [redacted] (Presentation from Kupsh's Witness 8)

[redacted] stated that she was present on May 15, 2025. [redacted] explained that Kupsh did not violate the Student Conduct Code or university policy. [redacted] shared that Kupsh "never used a megaphone, [held] any banners, assembled any structure, or used disorderly behavior." [redacted] said, "[Kupsh] was easy to spot, was not engaged in any sort of blockage, or prevention of access." [redacted] stated that Kupsh was not wearing a disguise. [redacted] explained that Kupsh was not using amplified sound. [redacted] shared that Kupsh "would ask questions about university policy and their actions." [redacted] explained that Kupsh did not "[disrupt]" campus activities.

In response to questions from Kupsh, [redacted] shared the following:

> [redacted] stated that the group was not "[blocking] or [preventing] any access."
>
> [redacted] explained that Kupsh was not wearing a disguise. [redacted] shared that Kupsh was "recognizable."
>
> [redacted] stated that Kupsh was asking questions to the SAMs and not preventing them for doing their job.
>
> [redacted] shared that Kupsh did not violate the Time, Place, and Manner policies or the Student Conduct Code.

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[redacted] explained that she does not carry her Bruin ID.

Dylan Kupsh (Presentation from the Accused Student)

Kupsh stated that Dean Murotake explained that "there's no evidence that [Kupsh] used amplified sound" or "assembled any unauthorized structures." Kupsh said, "The Dean's Office has made it extremely clear that there's no policy requiring you to carry your physical Bruin Card while you're on campus." Kupsh explained that Dean Murotake shared that asking questions is not a violation of the *Code*. Kupsh shared that seven of his witnesses stated that "[he] did not violate" the Student Conduct Code. Kupsh said, "All seven witnesses testified that I never used amplified sound, never assembled any unauthorized structure, or never violated the Time, Place, and Manner policy."

Kupsh explained that he was "communicating messages between university administration and students." Kupsh stated that his identity "was well know by the university." Kupsh explained that Professor [redacted], [redacted], and [redacted] stated that they heard the conversation between Miller and Kupsh. Kupsh stated that Professor [redacted], [redacted], and [redacted] shared that Kupsh was "asking relevant questions surrounding their actions at the demonstration." Kupsh said, "All three of them stated that [Miller] was able to completely fulfill his job duties." Kupsh shared that he was recognized by Sergeant Standberry, VSCA Gorden, and AVC Lurie. Kupsh explained that "there was mixed responses from all of the witnesses about carrying their physical Bruin Card on them."

Kupsh stated that he was present on May 15, 2025, "as an observer." Kupsh said, "At no point during this demonstration do I believe that I violated the Student Code of Conduct or any university policy." Kupsh explained that the group started at Dixon Court North and moved to Royce Quad. Kupsh stated that the group dispersed after being at Royce Quad for "about 30 minutes." Kupsh shared that he did not use amplified sound and was not wearing a disguise. Kupsh mentioned that he asked SAMs questions about university policy. Kupsh stated that his conversation with the SAMs was about five minutes long.

Kupsh explained that he did not "force" the SAMs to interact with him. Kupsh stated that he was asking questions to "better understand [the] TPM polices." Kupsh shared that Miller said, "[Kupsh], if you continue to ask questions, I'm gonna be forced to take down your ID, so that you can basically tell if you're a student or not; and if you're not a student, you'll be in the hands of UCPD." Kupsh explained that he was not the only person asking questions to the SAMs. Kupsh shared that there is no "university policy that says that you have to carry your physical Bruin Card everywhere that you go on campus."

Kupsh said, "I do not believe I violated the Time, Place, and Manner policy. I did not use amplified sound. I did not erect any unauthorized structures."

In response to questions from the Panel, Kupsh shared the following:

Kupsh explained that he did not "directly" interact with police officers.

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Kupsh shared that he left on his own on May 15, 2025.

Kupsh stated that Miller did not ask him "directly" to show his Bruin ID. Kupsh reiterated that Miller explained that if Kupsh continued to ask questions, then Kupsh would need to show Kupsh's Bruin ID to confirm his student status.

V. Analysis

The Panel reviewed the information from the hearing packet and the statements presented by Dean Murotake, [redacted], Gharagozli, [redacted], [redacted], [redacted], [redacted], Professor [redacted], [redacted], and Kupsh during the Hearing, in making their findings regarding the allegations.

Applicable *Code* Version: January 1, 2021

102.07: Violations of University Policy

Students may be subject to discipline for violation of any University policy.

102.13: Obstruction or Disruption

Obstruction or disruption of teaching, research, administration, disciplinary procedures, or other University activities.

102.14: Disorderly Behavior

Engaging in disorderly or lewd conduct.

102.16: Failure to Comply

Failure to identify oneself to, or comply with directions of, a University official or other public official acting in the performance of one's duties while on University property or at official University functions, or resisting or obstructing such University or other public officials in the performance of or the attempt to perform their duties.

The Panel referred to these definitions of the prohibited behavior in determining whether they believe Kupsh's behavior constituted a violation.

In particular, the Panel focused on the following:

The Panel noted that Dean Murotake explained that Miller stated that he obtained identification from UCLA students who were using the sound equipment. The Panel commented that Gamboa shared that the amplified sound was coming from a megaphone. The Panel discussed how Gamboa noted that "she was unable to recall the name of the person" that created the amplified sound. The Panel considered that Gean stated that Miller "was not able to get to the individuals using amplified sound." The Panel discussed that Dean Murotake stated that Kupsh is not seen in the pictures that Miller submitted. The Panel noted that Dean Murotake shared that, during his

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review, Dean Murotake did not learn that Kupsh was "a part of [the] crowd" or used "amplified sound."

The Panel noted that Professor [redacted] stated that "some individuals were using megaphones, but she did not know the identity of the users." The Panel commented that Professor [redacted] explained that on his way to the demonstration, he was not able to "hear anything." The Panel noted that [redacted] said, "I never saw [Kupsh] join in chanting or raise his voice." The Panel considered that Professor [redacted] explained that she did not see Kupsh "use amplified sound or play music." The Panel noted that [redacted] explained that Kupsh was not using amplified sound. The Panel commented that [redacted] explained that Kupsh did not "hold a microphone or megaphone." The Panel considered that Kupsh said, "All seven witnesses testified that I never used amplified sound, never assembled any unauthorized structure, or never violated the Time, Place, and Manner policy."

The Panel considered that Dean Murotake explained that during his review, he "did not learn from any of the witnesses that [Kupsh] was using any amplified sound." The Panel reviewed the amplified sound section in the UCLA Policy 852: Public Expression Activities and UCLA Policy 850: General Use of UCLA Property, and noted that Kupsh's actions, more likely than not, did not meet the criteria for the use of amplified sound.

The Panel determined that Kupsh, more likely than not, did not use amplified sound because Dean Murotake stated that during his review, he "did not learn from any of the witnesses that [Kupsh] was using any amplified sound." The Panel found that Kupsh, more likely than not, did not use amplified sound because Professor [redacted], [redacted], Professor [redacted], [redacted], and [redacted] stated that Kupsh did not use amplified sound. Because of these reasons, the Panel determined it was more likely than not that Kupsh did not engage in a violation of Section 102.07 (Violations of University Policy) [in reference to UCLA Policy 850: General Use of UCLA Property and Policy 852: UCLA Interim Policy 852: Public Expression Activities].

The Panel noted that Dean Murotake shared that Miller reported that Kupsh "obstructed SAMs from getting to individuals using amplified sound by placing himself in front of SAMs and asking questions." The Panel noted that Dean Murotake stated that Miller shared that the group was asking him relevant questions about the TPM policy.

The Panel noted that Professor [redacted] explained that she saw Kupsh and other students ask Miller "questions to clarify confusing information or directives to ensure that the information being conveyed was accurate." The Panel commented that [redacted] stated that Kupsh did not "prevent the [SAMs] from doing their jobs." The Panel considered that [redacted] said, "[Professor [redacted] and Kupsh] were walking alongside [Miller] and not obstructing him in any way, shape, or form." The Panel noted that [redacted] stated that Kupsh did not "impede [the] movements" of the SAMs. The Panel discussed how [redacted] explained that he heard Kupsh ask questions about "next steps and identification concerns." The Panel noted that [redacted] explained that Kupsh did not "[disrupt] campus activities." The Panel commented that Professor [redacted] shared that Kupsh was not blocking or stopping university officials from doing their job.

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The Panel commented that [redacted] shared that he "did not see [Kupsh] do anything that could be taken as obstruction or a disruption." The Panel noted that Kupsh stated that Professor [redacted], [redacted], and [redacted] shared that Kupsh was "asking relevant questions surrounding their actions at the demonstration." The Panel considered that Dean Murotake explained that asking questions to a university official was not a violation of the *Code.*

The Panel determined that Kupsh asking questions about the TPM policy to the SAMs was not an obstruction or disruption to the SAMs' job duties. The Panel found that Kupsh did not obstruct the SAMs for doing their job because Miller, Gamboa, Professor [redacted], and Kupsh explained that Kupsh was asking "relevant questions" about the TPM policy. Because of these reasons, the Panel determined it was more likely than not that Kupsh did not engage in a violation of Section 102.13 (Obstruction or Disruption).

The Panel noted that Dean Murotake explained that during his review, he did not learn that Kupsh "was a part of [the] crowd" and did not learn that Kupsh was "using amplified sound." The Panel commented that Dean Murotake stated that there was no information in Kupsh's Hearing Packet that Kupsh assembled an unauthorized structure. The Panel noted that Dean Murotake stated that Kupsh is not seen in the pictures that Miller submitted.

The Panel considered Professor [redacted]'s presentation and noted that Professor [redacted] shared that Kupsh "was an observer rather than a participant in the protest," and that Kupsh did not hold "any banners, erected no flags, built no structures." The Panel considered that [redacted] shared that Kupsh "never used a megaphone, [held] any banners, assembled any structure, or used disorderly behavior." The Panel noted that [redacted] said, "I did not see [Kupsh] erect any structure, or place any banner, or otherwise violate any university policy."

The Panel noted that [redacted] shared that Kupsh did not engaged in disorderly behavior. The Panel commented that [redacted] noted that Kupsh was "observing from the outside of the crowd." The Panel considered that [redacted] shared that Kupsh was "standing quietly at the edge of the rally." The Panel discussed that [redacted] stated that Kupsh was on "the sidelines." The Panel noted that Professor [redacted] explained that Kupsh was "on the sidelines" of the demonstration. The Panel considered that Kupsh stated that he was present on May 15, 2025, "as an observer." The Panel discussed that Kupsh said, "All seven witnesses testified that I never used amplified sound, never assembled any unauthorized structure, or never violated the Time, Place, and Manner policy."

The Panel found that Kupsh did not engage in disorderly behavior because Dean Murotake stated that there was no information in Kupsh's Hearing Packet that Kupsh assembled an unauthorized structure or engaged in use of amplified sound. The Panel determined that Kupsh did not violate Section 102.14 (Disorderly Behavior) because Kupsh and his witnesses confirmed that Kupsh did not assemble "any unauthorized structure" and that he was on the sidelines observing the demonstration. Because of these reasons, the Panel determined it was more likely than not that Kupsh did not engage in a violation of Section 102.14 (Disorderly Behavior).

For the reasons listed above, the Panel found that there was Insufficient Information to find by a preponderance standard that Kupsh violated Sections 102.07 (Violations of University Policy)

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[in reference to UCLA Policy 850: General Use of UCLA Property and Policy 852: UCLA Interim Policy 852: Public Expression Activities], 102.13 (Obstruction or Disruption), and 102.14 (Disorderly Behavior) of the *UCLA Student Conduct Code.*

The Panel noted that Dean Murotake shared that Miller said, "[Kupsh] used delayed tactics and failed to present student identification upon request." The Panel commented that Miller shared that Miller asked Kupsh for his ID, "but [Kupsh] did not provide his ID."

The Panel noted that Professor [redacted] said, "I never saw [Kupsh] refuse to comply with student affairs staff or prevent them from delivering advisements." The Panel commented that [redacted] shared that "administration officials were able to clearly identify [Kupsh]." The Panel noted that [redacted] stated that he "did not see [Kupsh] fail to comply with any orders." The Panel discussed how [redacted] noted "it was not difficult" for Miller to identity Kupsh.

The Panel determined that Miller was in his capacity as a university official to ask Kupsh for his Bruin ID. The Panel determined that Kupsh failed to comply because he did not provide his Bruin ID when requested by Miller. Therefore, for the reasons listed above, the Panel found that there was Sufficient Information to find by a preponderance standard that Kupsh violated Section 102.16 (Failure to Comply) of the *UCLA Student Conduct Code.*

VI. Recommended Sanction

Upon a finding of responsibility for a violation of Section 102.16 (Failure to Comply) of the *Code,* Dean Murotake recommended a sanction of a Warning.

10/12/2026

EXHIBIT T

10/12/2026

From: Lurie, Steven
To: Rush, Jasmine; Gorden, Monroe
Subject: Fw: Dylan Kupsh
Date: Friday, May 16, 2025 11:38:09 AM
Attachments: image001.png

Jasmine,

Good morning. See below from Jeff over at UCPD. As I stated in my prior email, I believe Dylan represents a special, stand out type of conduct violation. Perhaps Jeff's narrative can help us make a determination on an interim suspension.

Best regards,

Steve

Steve Lurie
Associate Vice Chancellor and Chief Safety Officer
Office of Campus and Community Safety

From: Lurie, Steven <slurie@conet.ucla.edu>
Sent: Friday, May 16, 2025 11:36:43 AM
To: Chobanian, Jeff <Chobanian@ucpd.ucla.edu>
Subject: Re: Dylan Kupsh

Jeff,

Thank you for the thorough write up. I am in active discussions with the dean of students office regarding this individual.

Steve

Steve Lurie
Associate Vice Chancellor and Chief Safety Officer
Office of Campus and Community Safety

From: Chobanian, Jeff <Chobanian@ucpd.ucla.edu>
Sent: Friday, May 16, 2025 11:13:01 AM
To: Lurie, Steven <slurie@conet.ucla.edu>
Subject: Dylan Kupsh

AVC Lurie,

I am writing to formally request that the Office of Student Conduct initiate a disciplinary review of UCLA student Dylan Kupsh due to ongoing and repeated violations of university policy, his continued disregard for university authority, and the disruptive impact of his actions on the campus community.

Over the past 18 months, Dylan Kupsh has been consistently involved in incidents requiring

10/12/2026

administrative and police intervention. He is a known organizer and public face of the suspended student group SJP, and despite the group's suspension, he continues to act in its name.

Mr. Kupsh regularly organizes unauthorized events and demonstrations. These activities have violated campus policy and created environments of disruption, intimidation, and disorder.

University administrators have observed Mr. Kupsh at multiple events over the past year where policy violations occurred. On several occasions, he has physically blocked access to campus facilities or pathways, interfered with staff performing their duties, and refused direct instructions from university officials. These actions have hindered the ability of university personnel to safely manage events and maintain order.

At the most recent event, held on May 15, 2025, Mr. Kupsh was again present and actively involved in organizing and leading the activities. Despite the presence of administrators who issued clear directives to comply with university policy, he chose to disregard their instructions. As a co-signer of SJP, he is directly and personally responsible for most of the TPM violations that occurred.

The event resulted in numerous violations of conduct and safety standards, and his role in escalating tensions was clearly visible.

What is especially concerning is that despite this long-standing pattern of defiance and disruption, Dylan Kupsh continues to be granted access to university property. His presence at these events is not incidental, he is a central figure who uses his access and visibility to mobilize others, challenge university rules, and undermine institutional authority.

Over the past year, his conduct's cumulative effect has created a hostile and unstable environment for other students, faculty, and staff.

The university must take firm and immediate action to address this ongoing behavior. Allowing it to persist not only sets a dangerous precedent but also erodes the standards of respect, accountability, and safety that UCLA is committed to upholding.

I strongly urge the Office of Student Conduct to review this matter in light of these violations' serious and repeated nature.

Thank you,

Jeff Chobanian

10/12/2025

Captain Chobanian (Acting) #307
Administrative Bureau
UCLA Police Department
601 Westwood Plaza
Los Angeles, CA 90095-1364
United States Secret Service Cyber Fraud Task Force
Internet Crimes Against Children Task Force
Main: 310-825-1491
Desk: 310-206-2480
Email: chobanian@ucpd.ucla.edu

UCLA PD Web | Facebook | X | Instagram

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16/12/2024

From: Murotake, Bryan
To: Nieves, Benito
Subject: FW: Chancellor Memo (DK)
Date: Friday, June 6, 2025 11:42:32 AM
Attachments: IR Letter Sent At 2025 05 23 10 34 AM (1).pdf
IMG 0810.jpg
IMG 0809.jpg
IMG 0807.jpg
Campus Activity 5 15 25 SAM Miller Report Redacted for Dylan.pdf
Chancellor Memo re DK.docx

Hi Benito,

Chancellor Memo for student DK.

Bryan Murotake
Assistant Dean of Students
Office of Student Conduct | Office of the Dean of Students
University of California, Los Angeles
1104 Murphy Hall | Los Angeles, CA 90095-1415
main: 310-825-3871 | fax: 310.825.8616
email: bmurotake@saonet.ucla.edu

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From: Murotake, Bryan
Sent: Friday, May 23, 2025 10:47 AM
To: Rush, Jasmine <jrush@saonet.ucla.edu>
Subject: Chancellor Memo (DK)

Hello Jasmine,

Accordingly, I am attaching the Chancellor memo for Vice Chancellor Gorden's signature and the Interim Suspension and Exclusion letter for student Dylan Kupsh ([redacted]).

I have also attached the supporting documents: SAMs report and three images from the incident.

Please let me know if the Vice Chancellor approves.

Thank you,

Bryan Murotake
Assistant Dean of Students
Office of Student Conduct | Office of the Dean of Students
University of California, Los Angeles

10/17/2025

1104 Murphy Hall | Los Angeles, CA 90095-1415
main: 310-825-3871 | fax: 310.825.8616
email: bmurotake@saonet.ucla.edu

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10/12/2026

From:	Rush, Jasmine
To:	Gorden, Monroe
Cc:	Nieves, Benito
Subject:	Interim Action Consideration for: Dylan Michael Kupsh
Date:	Friday, May 23, 2025 12:58:45 PM
Attachments:	image001.png IMG_0810.jpg IMG_0809.jpg IMG_0807.jpg Campus_Activity_5_15_25__SAM_Miller_Report_Redacted_for_Dylan.pdf Chancellor Memo re DK.docx IR_Letter_Sent_At_2025_05_23_11_50_AM (1).pdf

---

Dear Monroe,

Assistant Dean of Students, Bryan Murotake, is requesting your review and decision regarding an Interim Suspension and Exclusion for Dylan Michael Kupsh.
The accompanying documents are attached.

Sincerely,
Jasmine

Jasmine JS Rush
Dean of Students
Office of Student Conduct | Office of the Dean of Students
Student Affairs
1104 Murphy Hall, Box 951415
Los Angeles, CA 90095-1415

UCLA

Main: 310-825-3871
Direct: 310-825-3895
Fax: 310-825-8616
Email: jrush@saonet.ucla.edu

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10/12/2026

From:	Dylan Kupsh
To:	Dean Of Students Office; Murotake, Bryan; Gorden, Monroe; Nieves, Benito; Arciba, Estrella; Rush, Jasmine
Subject:	Re: Appeal of Interim Suspension and Exclusion from Campus
Date:	Monday, June 9, 2025 12:49:19 PM

Hello,

I would like to request that all scheduling for this appeal to happen via email.

Regards,

Dylan

> On Jun 6, 2025, at 8:37 PM, Dylan Kupsh <dkupsh@ucla.edu> wrote:
>
> Hello,
>
> I'm emailing to appeal the interim suspension and exclusion from campus, and schedule the subsequent hearing.
>
> Please note that I called the office number listed, and there was no response.
>
> Regards,
>
> Dylan

10/12/2026

From: Chobanian, Jeff
To: Lurie, Steven
Subject: Dylan Kupsh
Date: Friday, May 16, 2025 11:13:16 AM
Attachments: IMG_0194.jpg
image001.png
IMG_0195.jpg
IMG_0196.jpg

AVC Lurie,

I am writing to formally request that the Office of Student Conduct initiate a disciplinary review of UCLA student Dylan Kupsh due to ongoing and repeated violations of university policy, his continued disregard for university authority, and the disruptive impact of his actions on the campus community.

Over the past 18 months, Dylan Kupsh has been consistently involved in incidents requiring administrative and police intervention. He is a known organizer and public face of the suspended student group SJP, and despite the group's suspension, he continues to act in its name.

Mr. Kupsh regularly organizes unauthorized events and demonstrations. These activities have violated campus policy and created environments of disruption, intimidation, and disorder.

University administrators have observed Mr. Kupsh at multiple events over the past year where policy violations occurred. On several occasions, he has physically blocked access to campus facilities or pathways, interfered with staff performing their duties, and refused direct instructions from university officials. These actions have hindered the ability of university personnel to safely manage events and maintain order.

At the most recent event, held on May 15, 2025, Mr. Kupsh was again present and actively involved in organizing and leading the activities. Despite the presence of administrators who issued clear directives to comply with university policy, he chose to disregard their instructions. As a co-signer of SJP, he is directly and personally responsible for most of the TPM violations that occurred.

The event resulted in numerous violations of conduct and safety standards, and his role in escalating tensions was clearly visible.

What is especially concerning is that despite this long-standing pattern of defiance and disruption, Dylan Kupsh continues to be granted access to university property. His presence at these events is not incidental, he is a central figure who uses his access and visibility to mobilize others, challenge university rules, and undermine institutional authority.

Over the past year, his conduct's cumulative effect has created a hostile and unstable environment for other students, faculty, and staff.

The university must take firm and immediate action to address this ongoing behavior. Allowing it to persist not only sets a dangerous precedent but also erodes the standards of respect, accountability, and safety that UCLA is committed to upholding.

I strongly urge the Office of Student Conduct to review this matter in light of these violations'

10/12/2026

serious and repeated nature.

Thank you,

Jeff Chobanian

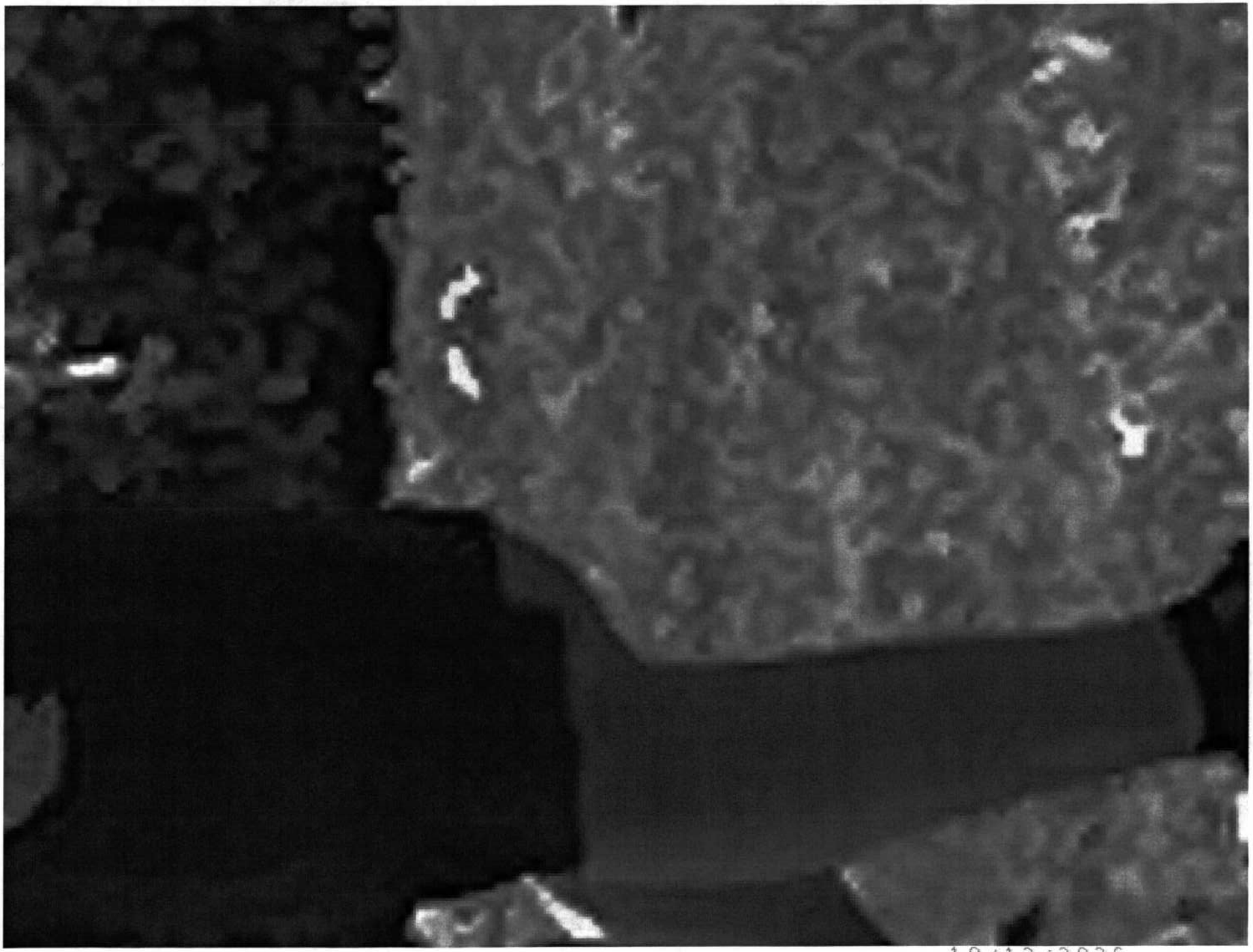
Captain Chobanian (Acting) #307
Administrative Bureau
UCLA Police Department
601 Westwood Plaza
Los Angeles, CA 90095-1364
United States Secret Service Cyber Fraud Task Force
Internet Crimes Against Children Task Force
Main: 310-825-1491
Desk: 310-206-2480
Email: chobanian@ucpd.ucla.edu
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10/12/2026


10/12/2026

10/12/2025



10/12/2026

From: Lurie, Steven
To: Rush, Jasmine; Gorden, Monroe
Subject: Fw: Dylan Kupsh
Date: Friday, May 16, 2025 11:38:08 AM
Attachments: image001.png

Jasmine,

Good morning. See below from Jeff over at UCPD. As I stated in my prior email, I believe Dylan represents a special, stand out type of conduct violation. Perhaps Jeff's narrative can help us make a determination on an interim suspension.

Best regards,

Steve

Steve Lurie
Associate Vice Chancellor and Chief Safety Officer
Office of Campus and Community Safety

From: Lurie, Steven <slurie@conet.ucla.edu>
Sent: Friday, May 16, 2025 11:36:43 AM
To: Chobanian, Jeff <Chobanian@ucpd.ucla.edu>
Subject: Re: Dylan Kupsh

Jeff,

Thank you for the thorough write up. I am in active discussions with the dean of students office regarding this individual.

Steve

Steve Lurie
Associate Vice Chancellor and Chief Safety Officer
Office of Campus and Community Safety

From: Chobanian, Jeff <Chobanian@ucpd.ucla.edu>
Sent: Friday, May 16, 2025 11:13:01 AM
To: Lurie, Steven <slurie@conet.ucla.edu>
Subject: Dylan Kupsh

AVC Lurie,

I am writing to formally request that the Office of Student Conduct initiate a disciplinary review of UCLA student Dylan Kupsh due to ongoing and repeated violations of university policy, his continued disregard for university authority, and the disruptive impact of his actions on the campus community.

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10/12/2026

administrative and police intervention. He is a known organizer and public face of the suspended student group SJP, and despite the group's suspension, he continues to act in its name.

Mr. Kupsh regularly organizes unauthorized events and demonstrations. These activities have violated campus policy and created environments of disruption, intimidation, and disorder.

University administrators have observed Mr. Kupsh at multiple events over the past year where policy violations occurred. On several occasions, he has physically blocked access to campus facilities or pathways, interfered with staff performing their duties, and refused direct instructions from university officials. These actions have hindered the ability of university personnel to safely manage events and maintain order.

At the most recent event, held on May 15, 2025, Mr. Kupsh was again present and actively involved in organizing and leading the activities. Despite the presence of administrators who issued clear directives to comply with university policy, he chose to disregard their instructions. As a co-signer of SJP, he is directly and personally responsible for most of the TPM violations that occurred.

The event resulted in numerous violations of conduct and safety standards, and his role in escalating tensions was clearly visible.

What is especially concerning is that despite this long-standing pattern of defiance and disruption, Dylan Kupsh continues to be granted access to university property. His presence at these events is not incidental, he is a central figure who uses his access and visibility to mobilize others, challenge university rules, and undermine institutional authority.

Over the past year, his conduct's cumulative effect has created a hostile and unstable environment for other students, faculty, and staff.

The university must take firm and immediate action to address this ongoing behavior. Allowing it to persist not only sets a dangerous precedent but also erodes the standards of respect, accountability, and safety that UCLA is committed to upholding.

I strongly urge the Office of Student Conduct to review this matter in light of these violations' serious and repeated nature.

Thank you,

Jeff Chobanian

10/12/2025

Captain Chobanian (Acting) #307
Administrative Bureau
UCLA Police Department
601 Westwood Plaza
Los Angeles, CA 90095-1364
United States Secret Service Cyber Fraud Task Force
Internet Crimes Against Children Task Force
Main: 310-825-1491
Desk: 310-206-2480
Email: chobanian@ucpd.ucla.edu

UCLA PD Web | Facebook | X | Instagram

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10/12/2023

INCIDENT REPORT INFORMATION

IR#	03529-2024

REFERRER'S INFORMATION

I am reporting	Hate Crime
Referrer's Name	[redacted]
Referrer's email	[redacted]
Reporter's Phone	[redacted]
May we contact you?	Yes

TIME AND LOCATION OF INCIDENT

Date/Time of Incident	June 23, 2024 12:00 pm
Location of Incident	9040 W. Pico Blvd and all pico robertson area which is a Jewish neighborhood. Like also the community shul and so on.

PARTIES INVOLVED

Student(s) Involved	not known possibly Dylan Kupsh
Student Groups Involved, if applicable	Student for Justice in Palestine and Graduate students for Justice in palestine
Non-Students Involved, if applicable	[redacted]

DESCRIPTIVE INFORMATION

Incident Description

The Palestinian Youth Movement, which was founded by UCLA faculty [redacted], organized a 'rally' (intifada) on 6/23/24. This was promoted by students for justice in Palestine. These UCLA affiliated organizations protested against Israel in front of a synagogue at 9040 W Pico Blvd Los Angeles, CA 90035.

Police eventually declared it unlawful and removed people from the area only after protestors beat up and used pepper spray against innocent Jewish people who had to defend themselves.

The jewish community felt like this was an antisemitic hate crime because they organized to protest Israel specifically in front of a synagogue in a jewish neighborhood.

Many jewish community synagogues were freaking out and felt terrorized.

Even after police left, some Jewish community members reported being attacked in different regions of the Jewish neighborhood like near the community shul. Here is the google drive with all evidence but I will upload some of it to the form: https://drive.google.com/drive/folders[redacted]

Status	Public

EXHIBIT 1
6/23/2024

INCIDENT REPORT INFORMATION

IR#	04232-2024
Incident Type	Consultation - Bias

REFERRER'S INFORMATION

I am reporting	Non-Academic Misconduct
Referrer's Name	[redacted]
Referrer's Dept	Other
Referrer's email	[redacted]
Reporter's Phone	[redacted]
Date Referred	September 08, 2024
Incident Term (quarter)	Spring

TIME AND LOCATION OF INCIDENT

Date/Time of Incident	April 26, 2024 3:00 pm
Location of Incident	I am reporting multiple incidents at multiple locations on multiple dates. Please see PDF attachment for details.
Location of Incident	Other On-campus/Other

PARTIES INVOLVED

Student(s) Involved	Dylan Kupsh
Student(s) Involved	Kupsh, Dylan (-) [redacted]
Student Groups Involved, If applicable	Students for Justice in Palestine Rank and File for a Democratic Union

DESCRIPTIVE INFORMATION

Incident Description	Please see PDF attachment for details.
Status	Completed

ADDITIONAL INFORMATION

Police Called	Yes

Cancel

10/12/2024

INCIDENT

IR#	04983-2024
Status	Processing
Incident Type	Consultation - Bias
Reporter's Phone	[redacted]
Archived On	October 7, 2024 4:50 PM
Archived By Staff	[redacted]

TIME AND LOCATION OF INCIDENT

Date/Time of Incident	October 3, 2024 5:51 pm
Location of Incident	Off campus non University
Additional Location Information	Daily Bruin website (online)

DESCRIPTION OF INCIDENT

Incident Description	See attached
Police Called	No
Alcohol Involved	No

10/17/2024

INCIDENT REPORT INFORMATION

IR#	05458-2024
Incident Type	Consultation - Bias

REFERRER'S INFORMATION

I am reporting	Student Group Conduct
Referrer's Name	[redacted]
Referrer's Dept	Other
Referrer's email	[redacted]
Reporter's Phone	[redacted]
May we contact you?	Yes
Date Referred	October 20, 2024
Incident Term (quarter)	Fall

TIME AND LOCATION OF INCIDENT

Date/Time of Incident	October 20, 2024 5:26 pm
Location of Incident	Cumulative events from October 7, 2024 to present
Location of Incident	Other On-campus/Other

PARTIES INVOLVED

Student(s) Involved	[redacted]; Dylan Kupsh; etc.
Student Groups Involved, if applicable	Cultural Affairs Committee; Students for Justice in Palestine; Jewish Voices for Peace; UC Divest Coalition

DESCRIPTIVE INFORMATION

Incident Description	See PDF

10/12/2024

For over a year, UCLA students, faculty, and staff have filed disciplinary complaints related to the activities of:

- Cultural Affairs Committee
- Students for Justice in Palestine
- Jewish Voices for Peace
- UC Divest Coalition

These groups are individually and jointly responsible for pervasive and persistent anti-Israel protests and events, including the notorious spring Encampment, the "die-in", the beating of the Netanyahu pinata, the repeated deployment of UCPD to campus, and other dramatic events. They are also individually and jointly responsible for pervasive and persistent social media posts that disparage Israel, Zionism, prominent Jewish individuals, and related trope.

Under the Group Conduct Code:

> **202.11b: Harassment**
>
> Harassment means conduct that is sufficiently severe, pervasive or persistent so as to ... creates a work environment that is intimidating, hostile or abusive.

A new report, which is attached, entitled, "Antisemitism and Anti-Israeli Bias at UCLA" documents: (1) the perceptions of Jewish UCLA faculty and staff on antisemitism, and (2) the impact of antisemitism on the health and well-being of faculty and staff. This report should constitute sufficient evidence of "a work environment that is intimidating, hostile or abusive" for the Office of the Dean of Students to take disciplinary action.

***

I trust that the Office of the Dean of Students can use this new report to take action based on prior incidents that have been reported in other complaints.

If I must re-document the activities of CAC/SJP/JVP/UCDC in order for charges of harassment to be considered, I ask that I be notified so that I can resubmit a complaint for consideration.

12/12/2024 10:11

Dylan Kupsh Complaint

Memberships

Dylan Kupsh is a prominent member of the following UCLA student organizations:

- Dylan Kupsh has a long history of supporting Students for Justice in Palestine at multiple UC campuses, as documented by Canary Mission.[1]

- Kupsh is also a member of Rank and File for a Democratic Union, which is a faction of UAW 4811, the union that represents UCLA graduate students and related workers. Kupsh has run for elected office under the banner of this organization.[2]

Throughout the 2023—2024 academic year, these two organizations organized and sponsored numerous anti-Israel events on the UCLA campus. Some of these events complied with UCLA's "time, place, and manner" rules on campus protests. However, these organizations began routinely breaking UCLA rules in spring 2024 in a series of escalating incidents.

Events during the Gaza Encampment:

Dylan Kupsh was one of the leaders of the Gaza Encampment and appears committing UCLA Student Conduct Code violations in multiple publicly-available videos.

(1) On April 26, 2024, [redacted], UCLA undergraduate student, was trying to walk along the path by the quad area with [redacted]. He was blocked by a college-aged white male with a mask and a yellow vest (worn by organizers in the camp). One was identified as Dylan Kupsh. [redacted] asked why they are not allowing him to enter a public space, and highlighted that these white men blocked a black student's access to a public area. Another camp organizer joined to engage with [redacted], calling him an "instigator/agitator". As [redacted] tried to continue walking on the path, the first organizer walked backwards in front of him to obstruct his path. He is able to advance a little, but more organizers in orange/yellow vests join, surround him, cover his camera, obstructing his path.

- https://www.instagram.com/p/C7DAB0IPBGx/
- https://www.tiktok.com/@michaelrapaport/video/7364408851011013934?lang=en

Alleged violations:

- 102.11a: Discrimination

[1] https://canarymission.org/individual/Dylan_Kupsh
[2] https://www.rnfdu.org/dylan

10/12/2024

- 102.14: Disorderly Behavior
- 102.27: Unwanted Personal Contact
- 102.15: Disturbing the Peace
- 102.24: Misuse of University Property

Identification image:



(2) On April 27, 2024, [redacted], member of the media, was checking into the media area of the UCLA encampment. His access was blocked by protesters, including Dylan Kupsh, who commanded each other to "link arms, link arms" as they proceeded to forcibly remove him from the area.

- https://www.breitbart.com/politics/2024/04/26/watch-activists-assault-breitbart-news-journalist-at-ucla-palestine-solidarity-encampment/

Alleged violations:

- 102.14: Disorderly Behavior
- 102.27: Unwanted Personal Contact
- 102.15: Disturbing the Peace
- 102.24: Misuse of University Property

Identification images:

10/12/2026



Publication on May 21, 2024:

On May 21, 2024, Dylan Kupsh published on op-ed in the *Daily Bruin* student newspaper entitled, *"Op-ed: Attacks on the Palestine solidarity encampment draw parallels to genocide in Gaza."*[3] The Daily Bruin is an official publication supported by the University whose purpose is to disseminate information to UCLA students, faculty, staff, and administrators.

Kupsh has freedom of speech and academic freedom. Yet he must nonetheless follow the UCLA Student Code of Conduct when engaged in activities that are relevant to the University. This includes publishing an op-ed in the University newspaper.

In his op-ed, Kupsh wrote: "I watched several Zionists make false police reports, insidiously claiming harassment for having someone stand near them or being forced to walk an extra five minutes – mainly because of UCLA decision-making." Kupsh is presumably referring to the widespread harassment and discrimination of Jews who were denied access to the library, classrooms, and public spaces unless they renounced Zionism. This was a violation of federal law, as recently recognized by a federal judge who wrote in a court order that "Jewish students were excluded from portions of the UCLA campus because they refused to denounce their faith."[4] UCLA has chosen not to appeal this court order.

Kupsh's op-ed is deeply hateful and insulting. It is also arguably a violation of the following provisions of the Student Code of Conduct:

10/12/2024

---

[3] https://dailybruin.com/2024/05/09/op-ed-attacks-on-the-palestine-solidarity-encampment-draw-parallels-to-genocide-in-gaza

[4] Quoted in Amy Dipierro, "Federal judge orders UCLA to ensure equal access to Jewish students following pro-Palestinian protests" *EdSource*. August 14, 2024. Available at: https://edsource.org/2024/federal-judge-orders-ucla-to-ensure-equal-access-to-jewish-students-following-pro-palestinian-protests/717544

- 202.01b: Fabrication ("...falsification ... of any information ... in an academic exercise")[5]
- 202.02: Forms of Dishonesty ("including, but not limited to, fabricating information or knowingly furnishing false information ... to the University")[6]

Events on June 10, 2024:

On June 10, 2024, over 100 SJP protestors organized multiple events across the UCLA campus throughout the day.[7] Dylan Kupsh appears committing Student Conduct Code violations in multiple publicly-available photographs and videos.

(1) A Jewish student and union employee at UCLA was denied access outside Young Hall by undergraduate and graduate student employees and faculty employed at UCLA. These employees had gathered there as part of the strike activities in violation of a Superior Court Judge order (included at end of reel) by their union UAW Local 4811.

- https://www.instagram.com/p/C8HliJgRp57/

As ASE Chair, Dylan promoted the UAW Strike aimed at "UC Divestment of Israel Occupation and Apartheid."

- https://ugc.production.linktr.ee/50c9eadd-6319-4579-bb0a-97dce376c417_Reform-UC-UAW---Palestinian-Liberation.png

Alleged violations:

- 102.11a: Discrimination
- 102.14: Disorderly Behavior
- 102.15: Disturbing the Peace
- 102.24: Misuse of University Property
- 102.27: Unwanted Personal Contact

Identification image:

10/12/2026

[5] The term "academic exercise" is not defined in the Student Code of Conduct.
[6] Kupsh wrote his op-ed in order to furnish "information ... to the University."
[7] City News Service "UCLA security heightened after latest pro-Palestine protest and arrests" *Los Angeles Daily News*. June 11, 2024. Available at: https://www.dailynews.com/2024/06/11/ucla-security-heightened-after-latest-pro-palestine-protest-and-arrests/



(2) Dylan Kupsh is participating in the encampment at top of Tongva Steps, Kerkhoff, and in Life Sciences Quad blocking access to campus community.

- https://x.com/RonaldRichards/status/1800386811250028875

Alleged violations:

- 102.13: Obstruction or Disruption
- 102.14: Disorderly Behavior
- 102.15: Disturbing the Peace
- 102.16: Failure to Comply
- 102.24: Misuse of University Property

(3) Dylan Kupsh is participating in the encampment at Kerkhoff, adjusting water-filled barriers and an accomplice in the encampment members blocked access, harassment and assault to an identified reporter, and blocked access to campus community.

- https://x.com/camhigby/status/1800351336975974565

Alleged violations:

- 102.13: Obstruction or Disruption
- 102.14: Disorderly Behavior
- 102.15: Disturbing the Peace
- 102.16: Failure to Comply
- 102.24: Misuse of University Property

Identification image:

10/12/2026



***

I request that the Dean of Students impose severe sanctions on Kupsh. I additionally request that the Dean take into account Kupsh's overall pattern of behavior over the 2023—2024 academic year. Kupsh did not make a one-time mistake. He did not accidentally violate the Student Code of Conduct. He has willfully and repeatedly violated UCLA rules. Failure to hold Kupsh accountable has led his to escalate this behavior.

I believe that Kupsh should be expelled from UCLA.

10/12/2024

On October 3, 2024, Kupsh published on op-ed in the Daily Bruin student newspaper entitled, "Op-ed: Admin's actions toward pro-Palestine protesters proves UCLA wants us dead."[1]

The *Daily Bruin* is an official publication supported by the University whose purpose is to disseminate information to UCLA students, faculty, staff, and administrators.

Kupsh has freedom of speech and academic freedom. Yet he must nonetheless follow the UCLA Student Code of Conduct when engaged in activities that are relevant to the University. This includes publishing an op-ed in the University newspaper.

During the Encampment, pro-Palestine protestors blocked access to public buildings and spaces based on other students' perceived identity as "Zionists." These activities have been well-documented on public social media and broadcast on international news media. These activities were violations of federal law, as recently recognized by a federal judge who wrote in a court order that "Jewish students were excluded from portions of the UCLA campus because they refused to denounce their faith."[2]

Despite this well-known court order—which Kupsh himself references in his op-ed—Kupsh falsely refers to the discrimination against Jews during the Encampment as "minor pathing inconveniences."

Kupsh also falsely claims the following:

1. Kupsh claims that a federal judge "mandated further repression" of protesters. This is false. A federal judge required that UCLA preserve access to public spaces for Jews.

2. Kupsh claims that UCLA's new TPM rules allow that administration "to essentially declare martial law." This is false. UCLA does not have authority to declare martial law or anything even remotely approximating it.

3. Kupsh claims that UCLA's new TPM rules have increased "Zionist violence against marginalized students on UC campuses." This is false. There have been no reported incidents of "Zionist violence."

---

[1] https://dailybruin.com/2024/10/03/op-ed-admin-complacency-in-attacks-on-pro-palestine-protesters-proves-ucla-wants-us-dead

[2] Quoted in Amy Dipierro, "Federal judge orders UCLA to ensure equal access to Jewish students following pro-Palestinian protests" *EdSource*. August 14, 2024. Available at: https://edsource.org/2024/federal-judge-orders-ucla-to-ensure-equal-access-to-jewish-students-following-pro-palestinian-protests/717544

10/12/2024

4. Kupsh claims that UCLA's new TPM rules will be "exclusively applied to pro-Palestine organizations and individuals." This is false. UCLA's TPM rules apply to all groups and individuals. Indeed, UCLA's Cultural Affairs Commission has already announced events involving Sudan. It presumably is using the new TPM rules to secure necessary permits for these events.

Kupsh's false claims are not mere statements of his opinions. They are claims that are blatantly and objectively false. They are also dangerous because they fuel the fear and paranoia that drives like-minded individuals on the UCLA campus to take violent and threatening acts against other students, faculty, and staff.

Kupsh should be punished under Section 102.02 of the Student Conduct Code.

9/26/2025 10:12:01

From: dean@saonet.ucla.edu
To: Rush, Jasmine
Subject: New public report has been submitted
Date: Wednesday, November 20, 2024 4:48:46 PM

A new public report has been submitted.

Please use the link to view the report: https://ucla-advocate.symplicity.com/incident/06283-2024
Student(s) Involved: Dylan Kupsh

10/11/2024

From:	dean@saonet.ucla.edu
To:	Rush, Jasmine
Subject:	New public report has been submitted
Date:	Monday, December 2, 2024 11:08:46 AM

A new public report has been submitted.

Please use the link to view the report: https://ucla-advocate.symplicity.com/incident/06482-2024
Student(s) Involved: Dylan Kupsh (known individual with whom we made contact but not necessarily involved in the incident)

10/11/2026

From: Murotake, Bryan
To: Rush, Jasmine
Cc: Nieves, Benito
Subject: RE: Consultation for Interim Suspension and Exclusion for Students
Date: Tuesday, February 25, 2025 10:21:16 AM

Hello Jasmine,

After campus consultation, it has been determined that I will not be proceeding with an Interim Suspension and Exclusion.

Best,

Bryan Murotake
Assistant Dean of Students
Office of Student Conduct | Office of the Dean of Students
University of California, Los Angeles
1104 Murphy Hall | Los Angeles, CA 90095-1415
main: 310-825-3871 | fax: 310.825.8616
email: bmurotake@saonet.ucla.edu

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From: Murotake, Bryan
Sent: Friday, February 21, 2025 10:38 AM
To: Rush, Jasmine <jrush@saonet.ucla.edu>
Cc: Benito Nieves <bnieves@saonet.ucla.edu>
Subject: Consultation for Interim Suspension and Exclusion for Students

Hello Jasmine,

Regarding the above captioned matter, our office has received a reports that student groups Student Justice for Palestine and Graduate Student Justice for Palestine engaged in activity that failed to comply with their interim suspension. Therefore, I am considering interim action for students: [redacted] Dylan Kupsh ([redacted]) and [redacted]

As a next step, I will be consulting with UCPD and Legal.

I will continue to keep you informed on any developing details.

Thank you,

EXHIBIT 26

Bryan Murotake
Assistant Dean of Students
Office of Student Conduct | Office of the Dean of Students
University of California, Los Angeles
1104 Murphy Hall | Los Angeles, CA 90095-1415
main: 310-825-3871 | fax: 310.825.8616
email: bmurotake@saonet.ucla.edu

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10/12/2025

From: Rush, Jasmine
To: Nieves, Benito
Cc: Lambey, Brianna
Subject: RE: New public report has been submitted
Date: Friday, November 15, 2024 8:46:00 AM
Attachments: image001.png
image002.png

Dear Benito,

Please download the report and send to CRO.

Sincerely,
Jasmine

Jasmine JS Rush
Dean of Students
Office of Student Conduct | Office of the Dean of Students
1104 Murphy Hall, Box 951415
Los Angeles, CA 90095-1415

UCLA

Main: 310-825-3871
Direct: 310-825-3895
Fax: 310-825-8616
Email: jrush@saonet.ucla.edu

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From: Nieves, Benito <bnieves@saonet.ucla.edu>
Sent: Tuesday, November 5, 2024 11:57 AM
To: Rush, Jasmine <jrush@saonet.ucla.edu>
Cc: Lambey, Brianna <blambey@saonet.ucla.edu>
Subject: Fw: New public report has been submitted

Dear Jasmine,

On October 20, 2024, DOSC received a public report from a non-affiliate, [redacted], naming individual students and student groups in allegations of possible bias (specifically, Antisemitism). The report contains two documents: one is alleging harassment (bias) by student groups, and mentions reports [redacted] has reported in the past (shared with yourself and Chandra); and the other is a 93-page report (written as though it has already been shared with Interim Chancellor Hunt), titled "Antisemitism and Anti-Israeli Bias at UCLA).

Best,

Benito Nieves

Associate Dean of Students

Office of Student Conduct | Office of the Dean of Students

1104 Murphy Hall

Los Angeles, CA 90095

UCLA

Main: 310-825-3871

Direct: 310-825-1589

Email: bnieves@saonet.ucla.edu

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From: dean@saonet.ucla.edu <dean@saonet.ucla.edu>
Sent: Sunday, October 20, 2024 5:44 PM
To: Nieves, Benito <bnieves@saonet.ucla.edu>
Subject: New public report has been submitted

A new public report has been submitted.

Please use the link to view the report: https://ucla-advocate.symplicity.com/incident/05458-2024
Student(s) Involved: [redacted]; Dylan Kupsh; etc.

10/12/2026

From: Murotake, Bryan
To: Rush, Jasmine
Subject: Chancellor Memo (DK)
Date: Friday, May 23, 2025 10:47:39 AM
Attachments: IR Letter Sent At 2025 05 23 10 34 AM (1).pdf
IMG 0810.jpg
IMG 0809.jpg
IMG 0807.jpg
Campus Activity 5 15 25 SAM Miller Report Redacted for Dylan.pdf
Chancellor Memo re DK.docx

Hello Jasmine,

Accordingly, I am attaching the Chancellor memo for Vice Chancellor Gorden's signature and the Interim Suspension and Exclusion letter for student Dylan Kupsh ([redacted]).

I have also attached the supporting documents: SAMs report and three images from the incident.

Please let me know if the Vice Chancellor approves.

Thank you,

Bryan Murotake
Assistant Dean of Students
Office of Student Conduct | Office of the Dean of Students
University of California, Los Angeles
1104 Murphy Hall | Los Angeles, CA 90095-1415
main: 310-825-3871 | fax: 310.825.8616
email: bmurotake@saonet.ucla.edu

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5/23/25 10:47 AM

cc: Benito Nieves, Associate Dean of Students
Estrella Arciba, Assistant Dean of Academic & Postdoctoral Services

10/12/2026

From: Lurie, Steven
To: Rush, Jasmine; Gorden, Monroe
Subject: Fw: Dylan Kupsh
Date: Friday, May 16, 2025 11:38:09 AM
Attachments: image001.png

Jasmine,

Good morning. See below from Jeff over at UCPD. As I stated in my prior email, I believe Dylan represents a special, stand out type of conduct violation. Perhaps Jeff's narrative can help us make a determination on an interim suspension.

Best regards,

Steve

Steve Lurie
Associate Vice Chancellor and Chief Safety Officer
Office of Campus and Community Safety

From: Lurie, Steven <slurie@conet.ucla.edu>
Sent: Friday, May 16, 2025 11:36:43 AM
To: Chobanian, Jeff <Chobanian@ucpd.ucla.edu>
Subject: Re: Dylan Kupsh

Jeff,

Thank you for the thorough write up. I am in active discussions with the dean of students office regarding this individual.

Steve

Steve Lurie
Associate Vice Chancellor and Chief Safety Officer
Office of Campus and Community Safety

From: Chobanian, Jeff <Chobanian@ucpd.ucla.edu>
Sent: Friday, May 16, 2025 11:13:01 AM
To: Lurie, Steven <slurie@conet.ucla.edu>
Subject: Dylan Kupsh

AVC Lurie,

I am writing to formally request that the Office of Student Conduct initiate a disciplinary review of UCLA student Dylan Kupsh due to ongoing and repeated violations of university policy, his continued disregard for university authority, and the disruptive impact of his actions on the campus community.

Over the past 18 months, Dylan Kupsh has been consistently involved in incidents requiring

10/12/2025

administrative and police intervention. He is a known organizer and public face of the suspended student group SJP, and despite the group's suspension, he continues to act in its name.

Mr. Kupsh regularly organizes unauthorized events and demonstrations. These activities have violated campus policy and created environments of disruption, intimidation, and disorder.

University administrators have observed Mr. Kupsh at multiple events over the past year where policy violations occurred. On several occasions, he has physically blocked access to campus facilities or pathways, interfered with staff performing their duties, and refused direct instructions from university officials. These actions have hindered the ability of university personnel to safely manage events and maintain order.

At the most recent event, held on May 15, 2025, Mr. Kupsh was again present and actively involved in organizing and leading the activities. Despite the presence of administrators who issued clear directives to comply with university policy, he chose to disregard their instructions. As a co-signer of SJP, he is directly and personally responsible for most of the TPM violations that occurred.

The event resulted in numerous violations of conduct and safety standards, and his role in escalating tensions was clearly visible.

What is especially concerning is that despite this long-standing pattern of defiance and disruption, Dylan Kupsh continues to be granted access to university property. His presence at these events is not incidental, he is a central figure who uses his access and visibility to mobilize others, challenge university rules, and undermine institutional authority.

Over the past year, his conduct's cumulative effect has created a hostile and unstable environment for other students, faculty, and staff.

The university must take firm and immediate action to address this ongoing behavior. Allowing it to persist not only sets a dangerous precedent but also erodes the standards of respect, accountability, and safety that UCLA is committed to upholding.

I strongly urge the Office of Student Conduct to review this matter in light of these violations' serious and repeated nature.

Thank you,

Jeff Chobanian

10/12/2025

Captain Chobanian (Acting) #307
Administrative Bureau
UCLA Police Department
601 Westwood Plaza
Los Angeles, CA 90095-1364
United States Secret Service Cyber Fraud Task Force
Internet Crimes Against Children Task Force
Main: 310-825-1491
Desk: 310-206-2480
Email: chobanian@ucpd.ucla.edu

UCLA PD Web | Facebook | X | Instagram

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10/12/2023

From: Guerrero, Flor
To: Rush, Jasmine
Subject: FW: Meeting with Dean of Students
Date: Tuesday, June 10, 2025 8:37:50 AM

Hello Jasmine,

I will move forward with confirming this meeting for you and Dylan. I will share with him your zoom information.

Thank you,
Flor Guerrero
Special Assistant
Dean of Students Organization
UCLA
1104 Murphy Hall
fguerrero@saonet.ucla.edu
310-825-3894

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From: Dylan Kupsh <dkupsh@ucla.edu>
Sent: Monday, June 9, 2025 6:14 PM
To: Guerrero, Flor <fguerrero@saonet.ucla.edu>
Subject: Re: Meeting with Dean of Students

Hello,

Tomorrow at 11am works for me.

Dylan

> On Jun 9, 2025, at 1:36 PM, Guerrero, Flor <fguerrero@saonet.ucla.edu> wrote:
>
> Dear Dylan,
>
> I am outreaching to you in regards to your email to Dean Rush about scheduling time to meet to appeal the interim suspension and exclusion. I am sharing a dates and times that Dean Rush is available to meet this week. Please feel free to confirm which date you prefer from the list below for a zoom meeting with Dean Rush.

EXHIBIT 16 / 12 / 2025

- Tuesday, June 10 at 9am, 11am or 4pm
- Thursday, June 12 at 4pm

Thank you,

Flor Guerrero
Special Assistant
Dean of Students Organization
UCLA
1104 Murphy Hall
fguerrero@saonet.ucla.edu
310-825-3894

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19/12/2023

From: Majekodunmi, Moji
To: Nieves, Benito; Rush, Jasmine
Cc: Saffarian, Mina
Subject: Grievance from TA Dylan Kupsh
Date: Wednesday, June 18, 2025 12:37:22 PM
Attachments: GR BX 25-33 (Dylan Kupsh - Suspension) 06-17 Grievance Form.pdf

Hello Jasmine and Benito,

I hope you're doing well. Labor Relations received the attached grievance from Teaching Assistant, Dylan Kupsh. In the grievance he states that on June 6th he was suspended and was:

> "prohibited from coming to campus, attending classes," "prohibited from attending any off-campus UCLA functions, activities or events and from entering any University-owned, -operated, or -leased housing or other facilities, without prior written permission from the Office of Student Conduct," and "will not be permitted to be present on the UCLA campus for any purpose."

He alleged that this suspension prevented him from carrying out his duties as TA. Would you be able to provide us with the suspension notification that was provided to Dylan?

We have a few questions regarding Dylan's suspension and would like to schedule a time to meet and discuss this further and to inquire, in general, about the student conduct process. Some of the questions are: What were the underlying allegations that led to Dylan's suspension? What is the duration of the suspension? Does he still have an active student status while on suspension, meaning can he still attend classes, etc.?

We are available on Tuesday, June 24 from 9-10 am, Wednesday, June 25 from 10-12 pm, and Thursday, June 26 from 10-11 am and 1-2 pm.

Thank you,
Moji

Moji Majekodunmi
Employee & Labor Relations Advocate
Employee & Labor Relations
UCLA Campus Human Resources

10/12/2026

UC/UAW STEP 2 GRIEVANCE FORM

Allegations of a violation of the UC/UAW Agreement must be filed on this form. See the relevant UC/UAW Agreement for details regarding the filing of a grievance. Forms must be submitted to the applicable Labor Relations Office, as applicable. Pursuant to section 3567 of HEERA, UC shall not agree to resolution of the grievance until the UAW has received a copy of the grievance and the proposed resolution and has been given the opportunity to file a response. **YOU MUST PROVIDE THE INFORMATION MARKED WITH AN ASTERISK (*) IN ACCORDANCE WITH THE GRIEVANCE AND ARBITRATION PROCEDURE OF THE UC/UAW AGREEMENT, OR IT MAY BE INELIGIBLE FOR FURTHER PROCESSING.**

GRIEVANT'S NAME * LAST FIRST MI

Kupsh, Dylan

GRIEVANCE NUMBER (TO BE COMPLETED BY THE UNIVERSITY)

BARGAINING UNIT CLASSIFICATION TITLE* (e.g. TA, GSR, Reader, Postdoc, etc.)

TA

GRIEVANT'S HIRING UNIT/DEPARTMENT *

Computer Science

GRIEVANT'S EMAIL ADDRESS

dkupsh@ucla.edu

NAME, TITLE, AND TELEPHONE NUMBER OF GRIEVANT'S IMMEDIATE SUPERVISOR

NON-UNIVERSITY ADDRESS TO WHICH CORRESPONDENCE MAY BE SENT TO GRIEVANT [REPRESENTATIVE'S ADDRESS MAY BE USED] *

2730 Telegraph Ave, Floor 1
Berkeley, CA 94705

REPRESENTATIVE'S NAME (IF *)

[redacted]

REPRESENTATIVE'S ORGANIZATION (IF APPLICABLE) *

UAW 4811

REPRESENTATIVE'S NON-UNIVERSITY TELEPHONE NUMBER

[redacted]

REPRESENTATIVE'S MAILING ADDRESS, CITY, STATE, ZIP

2730 Telegraph Ave, Floor 1
Berkeley, CA 94705

REPRESENTATIVE'S EMAIL ADDRESS

[redacted]

TYPE OF GRIEVANCE

Individual

SPECIFIC ARTICLE(S) & SECTION(S) OF THE UC/UAW AGREEMENT ALLEGED TO BE VIOLATED*

Non-Discrimination in Employment Article, Section A
Respectful Work Environment Article, all sections
Workspace and Instructional Support Article, all sections
Discipline and Dismissal Article, all sections
And all others that may apply

DATE OF ALLEGED VIOLATION(S)*

On or around 6/6/2025 and ongoing

DATE OF INFORMAL STEP 1 DISCUSSION WITH SUPERVISOR, IF ANY

DATE OF INFORMAL STEP 1 RESPONSE,IF ANY

ARE YOU REQUESTING A STEP 2 MEETING?

Yes

DESCRIPTION OF ALLEGED VIOLATION OF THE AGREEMENT.*

See attached

REMEDY REQUESTED*

See attached

GRIEVANT'S SIGNATURE

Dylan Kupsh

DATE

6/13/2025

REPRESENTATIVE'S SIGNATURE (IF REPRESENTED)

[redacted]

DATE

6/13/2025

10/12/2026

Description of alleged violation of the agreement:

During the Spring 2025 quarter, Dylan Kupsh is a Teaching Assistant in the Computer Science department for Professor [redacted]. Dylan has been offered and accepted a Summer 2025 position as a Teaching Assistant for Professor Bruce Huang.

On or about June 6th, 2025, the University notified Dylan Kupsh that he was "prohibited from coming to campus, attending classes," "prohibited from attending any off-campus UCLA functions, activities or events and from entering any University-owned, -operated, or -leased housing or other facilities, without prior written permission from the Office of Student Conduct," and "will not be permitted to be present on the UCLA campus for any purpose." During the week of June 9th, Dylan was not permitted to attend campus to fulfill his duties as a Teaching Assistant, including but not limited to, proctoring an exam. The University violated the Discipline and Dismissal article by improperly disciplining Dylan without establishing just cause. The University violated the Workspace and Instructional Support article by failing to provide access to required facilities for Dylan's position as a Teaching Assistant.

This suspension is the latest in a broader pattern of retaliatory and discriminatory abuse on the part of the University toward Dylan. On or about June 5th, 2025 while observing a protest on campus, Dylan Kupsh was called over by name by a campus security employee of the University. The University employee showed Dylan their phone lockscreen, which they had changed to a childhood picture of Dylan. This is part of a broader pattern of targeted harassment by UCPD, campus security, and the University, including regularly heckling Dylan by name in an effort to intimidate him. The University violated the Non-Discrimination in Employment article by harassing Dylan Kupsh on the basis of political affiliation and union activity. The University violated the Respectful Work Environment article by using "conduct in the workplace that denies, adversely limits, or interferes with an employee's participation in or benefit from University employment" and "creates an environment, whether intended or not, that is objectively intimidating or offensive."

Prohibiting Dylan from accessing campus, in addition to the pattern of harassment, constitutes improper disciplinary action by the University against Dylan Kupsh, which is a violation of the Discipline and Dismissal, Respectful Work Environment, and Non-Discrimination in Employment articles.

Remedy requested:
Rescind the interim suspension that prohibits Dylan from accessing campus and fulfilling his duties as a Teaching Assistant. Stop the pattern of harassment, including stopping abusive conduct by University employees. Make whole all losses.

10/12/2026

From: Rush, Jasmine
To: Gorden, Monroe
Cc: Nieves, Benito
Subject: Interim Action Consideration for: Dylan Michael Kupsh
Date: Friday, May 23, 2025 12:58:00 PM
Attachments: image001.png
IMG_0810.jpg
IMG_0809.jpg
IMG_0807.jpg
Campus Activity 5 15 25 SAM Miller Report Redacted for Dylan.pdf
Chancellor Memo re DK.docx
IR Letter Sent At 2025 05 23 11 50 AM (1).pdf

Dear Monroe,

Assistant Dean of Students, Bryan Murotake, is requesting your review and decision regarding an Interim Suspension and Exclusion for Dylan Michael Kupsh.
The accompanying documents are attached.

Sincerely,
Jasmine

Jasmine JS Rush
Dean of Students
Office of Student Conduct | Office of the Dean of Students
Student Affairs
1104 Murphy Hall, Box 951415
Los Angeles, CA 90095-1415

UCLA

Main: 310-825-3871
Direct: 310-825-3895
Fax: 310-825-8616
Email: jrush@saonet.ucla.edu

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10/11/2025

From: Guerrero, Flor
To: Rush, Jasmine
Subject: meeting notes
Date: Thursday, June 12, 2025 11:45:19 AM
Attachments: Interim Suspension Appeal meeting- D.Kupsh.docx

Hello Jasmine,

Attached are my notes from the meeting I served as administrative support.

Thank you,
Flor Guerrero
Special Assistant
Dean of Students Organization
UCLA
1104 Murphy Hall
fguerrero@saonet.ucla.edu
310-825-3894

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10/12/2026

Interim Suspension Appeal meeting- Dylan Kupsh (June 10 at 11am via zoom)

- Attendees
  - Dylan Kupsh- student
  - Jasmine Rush- Dean of Students
  - Flor Guerrero- Administrative Support
  - [redacted]- support person Dylan
  - Thomas Harvey- support person for Dylan
- Dean Rush explained the interim suspension appeal process and her role as the interim suspension appeal process
- Dean Rush explained that interim suspension appeal will result in one of three outcomes
  - Modified
  - Upheld
  - Removed
- The final decision in regards to the interim will be shared within Dylan three days and if more time is needed then Jasmine will notify Dylan of the new deadline for the Decision
- Dylan asked where in the Student Conduct Code it details the interim suspension appeal process
  - Dean Rush shared it is in the very back of the code and read the part of the code out loud where Dylan could refer to
- Dean Rush reviewed the students right to have a support person and advisor in the meeting and through the student conduct process
- Dean Rush shared that information in this meeting shared regarding a student's conduct matter will be shared with the students assigned dean
- Dean Rush shared information about CAE and accommodations
- Dean Rush shared that she has reviewed the case information. Dylan shared that he had not received the case file materials from his assigned dean.
  - Dean Rush shared she was not aware that Dylan had not received his case file materials
  - Dean Rush described the materials for Dylan's she has reviewed.
- Dean Rush shared that rescheduling is an option for Dylan as Dylan had not received the documents related to his conduct matter
  - Dylan shared that he will reschedule for another available time
- Dylan noted that this has been a common issue that he has experienced in regards to getting access to case files involving him and asked how it can be remedied.
  - Dean Rush shared that Dylan can connect with the Director of Student Conduct regarding his concerns about obtaining records regarding conduct matters
  - Dylan shared that he has obtained information through records requests and has noticed that redactions to documents were done to names of non-affiliates and employees of the Office of Student Conduct
- Thomas Harvey asked if there would be a possibility to modify the interim suspension in the time being to allow Dylan to attend any mandatory events Dylan has on campus
  - Dean Rush shared that Dylan can request an exception from the Assigned Dean to allow Dylan to be on campus to attend any mandatory events.
- Meeting was paused until Dylan received documents related to his case

10/12/2023

From: dean@saonet.ucla.edu
To: Rush, Jasmine
Subject: New public report has been submitted
Date: Sunday, April 27, 2025 2:06:59 PM

A new public report has been submitted.

Please use the link to view the report: https://ucla-advocate.symplicity.com/incident/[redacted]
Student(s) Involved: [redacted]

Dylan Kupsh
[ASUCLA Board of Directors; GSJP]

10/12/2025

messages.

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Visit zoom.us
55 Almaden Blvd
San Jose, CA 95113

10/12/2025

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-----Original Message-----
From: Dylan Kupsh <dkupsh@ucla.edu>
Sent: Monday, June 9, 2025 12:49 PM
To: Dean Of Students Office <dean@saonet.ucla.edu>; Murotake, Bryan <bmurotake@saonet.ucla.edu>; Gorden, Monroe <mgorden@saonet.ucla.edu>; Nieves, Benito <bnieves@saonet.ucla.edu>; Arciba, Estrella <earciba@grad.ucla.edu>; Rush, Jasmine <jrush@saonet.ucla.edu>
Subject: Re: Appeal of Interim Suspension and Exclusion from Campus

Hello,

I would like to request that all scheduling for this appeal to happen via email.

Regards,

Dylan

> On Jun 6, 2025, at 8:37 PM, Dylan Kupsh <dkupsh@ucla.edu> wrote:
>
> Hello,
>
> I'm emailing to appeal the interim suspension and exclusion from campus, and schedule the subsequent hearing.
>
> Please note that I called the office number listed, and there was no response.
>
> Regards,
>
> Dylan

10/12/2025

From: Rush, Jasmine
To: Guerrero, Flor
Cc: Murotake, Bryan; Lambey, Brianna; Nieves, Benito
Subject: RE: Appeal of Interim Suspension and Exclusion from Campus
Date: Tuesday, June 10, 2025 10:16:00 AM

Thank you, Flor.

Sincerely,
Jasmine

Jasmine JS Rush
Dean of Students
Office of the Dean of Students
Student Affairs
1104 Murphy Hall, Box 951415
Los Angeles, CA 90095-1415

Main: 310-825-3871
Direct: 310-825-3895
Fax: 310-825-8616
Email: jrush@saonet.ucla.edu

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-----Original Message-----
From: Guerrero, Flor <fguerrero@saonet.ucla.edu>
Sent: Tuesday, June 10, 2025 10:02 AM
To: Rush, Jasmine <jrush@saonet.ucla.edu>
Cc: Murotake, Bryan <bmurotake@saonet.ucla.edu>; Lambey, Brianna <blambey@saonet.ucla.edu>; Nieves, Benito <bnieves@saonet.ucla.edu>
Subject: RE: Appeal of Interim Suspension and Exclusion from Campus

Hello Jasmine,

I have confirmed you to meet with Dylan today at 11am via zoom.

Thank you,

Flor Guerrero
Special Assistant
Dean of Students Organization
UCLA
1104 Murphy Hall
fguerrero@saonet.ucla.edu
310-825-3894

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10/12/2025

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-----Original Message-----
From: Rush, Jasmine <jrush@saonet.ucla.edu>
Sent: Saturday, June 7, 2025 6:32 PM
To: Guerrero, Flor <fguerrero@saonet.ucla.edu>
Cc: Murotake, Bryan <bmurotake@saonet.ucla.edu>; Lambey, Brianna <blambey@saonet.ucla.edu>; Nieves, Benito <bnieves@saonet.ucla.edu>
Subject: FW: Appeal of Interim Suspension and Exclusion from Campus

Dear Flor,

Please connect with Dylan upon your return to the office, to schedule a meeting.

Sincerely,
Jasmine

Jasmine JS Rush
Dean of Students
Office of the Dean of Students
Student Affairs
1104 Murphy Hall, Box 951415
Los Angeles, CA 90095-1415

Main: 310-825-3871
Direct: 310-825-3895
Fax: 310-825-8616
Email: jrush@saonet.ucla.edu

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-----Original Message-----
From: Dylan Kupsh <dkupsh@ucla.edu>
Sent: Friday, June 6, 2025 8:37 PM
To: Dean Of Students Office <dean@saonet.ucla.edu>; Murotake, Bryan <bmurotake@saonet.ucla.edu>; Gorden, Monroe <mgorden@saonet.ucla.edu>; Nieves, Benito <bnieves@saonet.ucla.edu>; Arciba, Estrella <earciba@grad.ucla.edu>; Rush, Jasmine <jrush@saonet.ucla.edu>
Subject: Appeal of Interim Suspension and Exclusion from Campus

Hello,

I'm emailing to appeal the interim suspension and exclusion from campus, and schedule the subsequent hearing.

Please note that I called the office number listed, and there was no response.

10/12/2025

Regards,

Dylan



10/12/2023

From: Murotake, Bryan
To: Rush, Jasmine
Cc: Nieves, Benito
Subject: RE: Consultation for Interim Suspension and Exclusion for Students
Date: Monday, May 19, 2025 5:28:32 PM

Hello Jasmine,

I am writing to follow-up that UCPD and Legal have approved interim action for students [redacted] and Dylan.

Accordingly, I will draft the interim memo for the Chancellor's (or designee's) signature.

Best,

Bryan Murotake
Assistant Dean of Students
Office of Student Conduct | Office of the Dean of Students
University of California, Los Angeles
1104 Murphy Hall | Los Angeles, CA 90095-1415
main: 310-825-3871 | fax: 310.825.8616
email: bmurotake@saonet.ucla.edu

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From: Murotake, Bryan
Sent: Friday, May 16, 2025 10:28 AM
To: Rush, Jasmine <jrush@saonet.ucla.edu>
Cc: Nieves, Benito <bnieves@saonet.ucla.edu>
Subject: Consultation for Interim Suspension and Exclusion for Students

Hello Jasmine,

I am writing to inform you that I am considering interim action against students [redacted] and Dylan Kupsh ([redacted]).

The Office of Student Conduct has received a report that students [redacted] and Dylan Kupsh engaged in activity that violated UCLA TPMs policy and failed to comply with UCLA Staff.

Therefore, I am considering interim action for students: [redacted] and Dylan Kupsh for other disruptive activity incompatible with the orderly operation of the campus.

As a next step, I will be consulting with UCPD and Legal.

12/12/2025

I will continue to keep you informed on any developing details.

Thank you,

Bryan Murotake
Assistant Dean of Students
Office of Student Conduct | Office of the Dean of Students
University of California, Los Angeles
1104 Murphy Hall | Los Angeles, CA 90095-1415
main: 310-825-3871 | fax: 310.825.8616
email: bmurotake@saonet.ucla.edu

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10/12/2026

From: Rush, Jasmine
To: Dylan Kupsh
Subject: RE: Deadline Extension for Interim Suspension and Exclusion Decision
Date: Monday, June 16, 2025 11:38:00 AM
Attachments: image001.png

Dear Dylan,

Thank you for the update.

Unfortunately, with the limited time available between Friday afternoon and this morning, and because I am still reviewing everything, I will be unable to issue a partial decision at this time.

Please know that I am working diligently to provide you with an appeal decision this week.

Sincerely,
Jasmine

Jasmine JS Rush
Dean of Students
Office of the Dean of Students
Student Affairs
1104 Murphy Hall, Box 951415
Los Angeles, CA 90095-1415

UCLA

Main: 310-825-3871
Direct: 310-825-3895
Fax: 310-825-8616
Email: jrush@saonet.ucla.edu

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From: Dylan Kupsh <dkupsh@ucla.edu>
Sent: Friday, June 13, 2025 1:37 PM
To: Rush, Jasmine <jrush@saonet.ucla.edu>
Subject: Re: Deadline Extension for Interim Suspension and Exclusion Decision

Hi Jasmine,

Thank you for the update.

As I shared during our meeting, I'm supposed to attend the ASUCLA Board of Directors retreat. I have learned that it is on June 16-17 in Kerkhoff Hall. I was wondering if you could make a decision surrounding that in the mean-time, before a full decision on the appeal.

Dylan

10/12/2026

On Jun 13, 2025, at 9:45 AM, Rush, Jasmine <jrush@saonet.ucla.edu> wrote:

Dear Dylan,

I am writing to inform you of the extension to the deadline for your Interim Suspension and Exclusion appeal decision.
I will need more time to review the information that you shared in our meeting, and with me via email. I have also outreached to Dr. [redacted]. He is traveling, but he will return on Monday. I plan to meet with him then. Further, this may also provide some time for you to submit the documents that you referenced in your last email, should you choose to, in advance of a decision.

The new deadline for a decision is June 18, 2025.

Sincerely,
Jasmine

Jasmine JS Rush
Dean of Students
Office of the Dean of Students
Student Affairs
1104 Murphy Hall, Box 951415
Los Angeles, CA 90095-1415

<image001.png>

Main: 310-825-3871
Direct: 310-825-3895
Fax: 310-825-8616
Email: jrush@saonet.ucla.edu

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10/12/2026

From: Majekodunmi, Moji
To: Murotake, Bryan; Nieves, Benito; Rush, Jasmine
Cc: Saffarian, Mina
Subject: RE: Grievance from TA Dylan Kupsh
Date: Wednesday, June 18, 2025 1:51:11 PM
Attachments: image002.png
image003.png

Thanks, all! I'll send an invite.

Moji Majekodunmi
Employee & Labor Relations Advocate
Employee & Labor Relations
UCLA Campus Human Resources

From: Murotake, Bryan <bmurotake@saonet.ucla.edu>
Sent: Wednesday, June 18, 2025 1:47 PM
To: Nieves, Benito <bnieves@saonet.ucla.edu>; Rush, Jasmine <jrush@saonet.ucla.edu>; Majekodunmi, Moji <kmajekodunmi@chr.ucla.edu>
Cc: Saffarian, Mina <msaffarian@chr.ucla.edu>
Subject: Re: Grievance from TA Dylan Kupsh

Hello Moji,

I am available June 24, 2025, at 9:00am, as well.

Thank you,

Bryan Murotake, J.D. (he/him/his)
Assistant Dean of Students
Office of Student Conduct |Office of the Dean of Students
University of California, Los Angeles
1104 Murphy Hall | Los Angeles, CA 90095-1415
main: 310-825-3871 | fax: 310.825.8616
email: bmurotake@saonet.ucla.edu

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From: Nieves, Benito <bnieves@saonet.ucla.edu>
Date: Wednesday, June 18, 2025 at 1:45 PM
To: Rush, Jasmine <jrush@saonet.ucla.edu>, Majekodunmi, Moji <kmajekodunmi@chr.ucla.edu>
Cc: Saffarian, Mina <msaffarian@chr.ucla.edu>, Murotake, Bryan <bmurotake@saonet.ucla.edu>
Subject: Re: Grievance from TA Dylan Kupsh

10/12/2026

Dear Moji,

I am able to attend on 06/24 at 9:00 a.m., as well.

Best,

Benito Nieves
Interim Director, Office of Student Conduct
Associate Dean of Students, Office of the Dean of Students
1104 Murphy Hall
Los Angeles, CA 90095

UCLA

Main: 310-825-3871
Direct: 310-825-1589
Email: bnieves@saonet.ucla.edu

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From: Rush, Jasmine <jrush@saonet.ucla.edu>
Sent: Wednesday, June 18, 2025 1:40 PM
To: Majekodunmi, Moji <kmajekodunmi@chr.ucla.edu>; Nieves, Benito <bnieves@saonet.ucla.edu>
Cc: Saffarian, Mina <msaffarian@chr.ucla.edu>; Murotake, Bryan <bmurotake@saonet.ucla.edu>
Subject: RE: Grievance from TA Dylan Kupsh

Dear Moji,

6/24 at 9am works for me.
I am also adding Bryan Murotake, as he is currently working with the student.

I recommend that Bryan, Benito, and I attend the meeting with you, schedule permitting.

Sincerely,
Jasmine

Jasmine JS Rush
Dean of Students
Office of the Dean of Students
Student Affairs
1104 Murphy Hall, Box 951415
Los Angeles, CA 90095-1415

UCLA

Main: 310-825-3871
Direct: 310-825-3895
Fax: 310-825-8616
Email: jrush@saonet.ucla.edu

10/12/2026

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From: Majekodunmi, Moji <kmajekodunmi@chr.ucla.edu>
Sent: Wednesday, June 18, 2025 12:37 PM
To: Nieves, Benito <bnieves@saonet.ucla.edu>; Rush, Jasmine <jrush@saonet.ucla.edu>
Cc: Saffarian, Mina <msaffarian@chr.ucla.edu>
Subject: Grievance from TA Dylan Kupsh

Hello Jasmine and Benito,

I hope you're doing well. Labor Relations received the attached grievance from Teaching Assistant, Dylan Kupsh. In the grievance he states that on June 6th he was suspended and was:

> "prohibited from coming to campus, attending classes," "prohibited from attending any off-campus UCLA functions, activities or events and from entering any University-owned, -operated, or -leased housing or other facilities, without prior written permission from the Office of Student Conduct," and "will not be permitted to be present on the UCLA campus for any purpose."

He alleged that this suspension prevented him from carrying out his duties as TA. Would you be able to provide us with the suspension notification that was provided to Dylan?

We have a few questions regarding Dylan's suspension and would like to schedule a time to meet and discuss this further and to inquire, in general, about the student conduct process. Some of the questions are: What were the underlying allegations that led to Dylan's suspension? What is the duration of the suspension? Does he still have an active student status while on suspension, meaning can he still attend classes, etc.?

We are available on Tuesday, June 24 from 9-10 am, Wednesday, June 25 from 10-12 pm, and Thursday, June 26 from 10-11 am and 1-2 pm.

Thank you,
Moji

Moji Majekodunmi
Employee & Labor Relations Advocate
Employee & Labor Relations
UCLA Campus Human Resources

10/17/2025

From: Majekodunmi, Moji
To: Rush, Jasmine; Nieves, Benito; Murotake, Bryan; Saffarian, Mina
Subject: Re: Grievance from TA Dylan Kupsh

Moji Majekodunmi - UCLA ELR Advocate is inviting you to a scheduled Zoom meeting.
Join Zoom Meeting
https://ucla.zoom.us/j [redacted]

Meeting ID: [redacted]
Passcode [redacted]

—

One tap mobile
[redacted]

—

Dial by your location
[redacted]

Meeting ID: [redacted]
Passcode: [redacted]

Find your local number: https://ucla.zoom.us/u/adBGe62uio

—

Join by SIP
[redacted]

—

Join by H.323
[redacted]

Meeting ID: [redacted]
Passcode: [redacted]

10/12/2026

-----Original Message-----
From: Lambey, Brianna <blambey@saonet.ucla.edu>
Sent: Thursday, May 22, 2025 5:23 PM
To: Bhatnagar, Chandra <cbhatnagar@equity.ucla.edu>; Toscano, Carmen <ctoscano@equity.ucla.edu>
Cc: Rush, Jasmine <jrush@saonet.ucla.edu>; Nieves, Benito <bnieves@saonet.ucla.edu>; Ovalle-Stevenson, Adriana <aovalle@equity.ucla.edu>
Subject: FW: New public report has been submitted

Dear Chandra and Carmen,

Our office received a public report that was submitted by student Dylan Kupsh regarding [redacted]. The reporting party shares the following about an event that occurred on June 10 and [redacted] involvement: [redacted] discriminated against students based on their association with Palestinian identity, and doxxing students for attending a lawfully conducted meeting. [redacted] actions caused significant distress and resulted in online harassment of attendees, significantly impairing their ability to participate in or benefit from the services, activities, or opportunities offered by the University."

10/12/2026

Sincerely,
Brianna Lambey
Program Coordinator
UCLA Office of Student Conduct
Office of the Dean Of Students
1104 Murphy Hall
(310)-825-3871
blambey@saonet.ucla.edu

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-----Original Message-----
From: dean@saonet.ucla.edu <dean@saonet.ucla.edu>
Sent: Thursday, May 22, 2025 5:08 PM
To: Lambey, Brianna <blambey@saonet.ucla.edu>
Subject: New public report has been submitted

A new public report has been submitted.

Please use the link to view the report: https://ucla-advocate.symplicity.com/incident/[redacted]
Student(s) Involved: [redacted]

10/12/2026

From: Anderson, Adrian
To: Rush, Jasmine; Leon, Fabiola
Cc: Davis, Richard L.
Subject: RE: Student Complaint
Date: Wednesday, June 11, 2025 6:40:41 AM
Attachments: Complaint 6.5.25.pdf
image001.png

Good Morning Jasmine,

I'm cc'ing/connecting you with Administrative Lieutenant Davis who is responsible for intaking complaints for the department.

Thank you,
Adrian

From: Rush, Jasmine <jrush@saonet.ucla.edu>
Sent: Tuesday, June 10, 2025 6:05 PM
To: Leon, Fabiola <fleon@ucpd.ucla.edu>; Anderson, Adrian <anderson@ucpd.ucla.edu>
Subject: Student Complaint

Dear Sgts. Leon and Anderson,

Today, student Dylan Kupsh shared several concerns regarding his experiences with UCPD and Security staff. I informed him that he could file a complaint with UCPD. I am not sure if he will outreach, but given the information shared, I have attached the UCPD complaint form with his information. I did not see the ability to share his concerns via a different form on the UCPD website, but if this is not correct, please let me know, and I can resubmit appropriately. If there is a different staff member that it is preferred I provide this information to, please let me know.

Sincerely,
Jasmine

Jasmine JS Rush
Dean of Students
Office of the Dean of Students
Student Affairs
1104 Murphy Hall, Box 951415
Los Angeles, CA 90095-1415

UCLA

Main: 310-825-3871
Direct: 310-825-3895
Fax: 310-825-8616
Email: jrush@saonet.ucla.edu

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10/17/2025

message.





10/12/2026

UNIVERSITY OF CALIFORNIA, LOS ANGELES POLICE DEPARTMENT

COMPLAINT FROM MEMBER OF THE PUBLIC

WHAT IF I HAVE A COMPLAINT?

A relationship of trust and confidence between members of the UCLA Police Department and the community we serve is essential to effective law enforcement. Police officers must be free to exercise their best judgment and to initiate law enforcement action in a reasonable, lawful and impartial manner, without fear of reprisal. Likewise, police officers have a special obligation to respect the rights of all persons.

The UCLA Police Department acknowledges its responsibility to establish a system of complaint and disciplinary procedures which not only subject the officer to corrective action when he/she conducts himself/herself improperly, but also will protect him/her from unwarranted criticism when he/she discharges his/her duties properly. It is the purpose of these procedures to provide a prompt, equitable, open and expeditious disposition of complaints regarding the conduct of any members of the Department.

To this end, the UCLA Police Department welcomes from members of the community constructive criticism of the Department and valid complaints against its members or procedures.

HOW DO I MAKE A COMPLAINT?

A complaint may be made in person, initially by telephone, or by mail to any police supervisor of the UCLA Police Department. The form can be obtained in person at the UCLA Police Department or the form can be faxed or mailed to you.

The UCLA Police Department is located at: **601 Westwood Plaza, Los Angeles 90095-1364**.

MUST A COMPLAINT BE MADE IN PERSON?

An initial complaint may be made by telephone or by mail, however, you will be asked to complete and sign a written form, as well as be interviewed by an investigator.

ARE THERE ANY RESTRICTIONS ON MAKING A COMPLAINT?

A complaint should be made as soon after the incident as practical.

WILL MY COMPLAINT BE INVESTIGATED?

Each complaint is read and assigned by the Chief of Police or his/her designee to be completely and thoroughly investigated by a UCLA Police Department police supervisor.

WILL ACTION BE TAKEN AGAINST THE OFFICER?

If an officer's actions have violated departmental rules or regulations, or other policies or laws, appropriate action will be taken.

PERSONS UNDER THE AGE OF 18

A person under the age of 18 may file a complaint with the knowledge of a parent or legal guardian.

"Working together to keep our community safe"

(Revised 1/3/23)

UNIVERSITY OF CALIFORNIA, LOS ANGELES POLICE DEPARTMENT

COMPLAINT FROM MEMBER OF THE PUBLIC

NAME Rush, Jasmine_____
Last First Middle

ADDRESS 1104 Murphy Hall_____
Number/Street City/State Zip

PHONE NUMBER(S) (310) 825-3894_____

DATE/TIME OF INCIDENT Multiple Instances shared_____ARRESTED ☐ CITED ☐

LOCATION OF INCIDENT Locations on UCLA Campus_____
Street Address or Description of Location

COMPLAINT IS AGAINST OFFICER(S):

NAME UCLA: Names not provided (may be unknown by student)_____ID# _____

NAME Security Staff: Names not provided (may be unknown by student)_____ID# _____

NATURE OF COMPLAINT (Use additional sheets if necessary)

on 6/10/25, student Dylan Kupsh, shared that the student has been the subject of multiple instances of harassment at UCLA by various members of UCPD and Security staff. The student mentioned several incidents which include 1) being "yelled at" by UCPD while walking, and 2) a Security staff member holding up the staff member's phone, and then changing the picture to be a picture of the student when the student was 11 years old. The student indicated feeling that UCPD and Security staff were watching the student. The student did not provide the names of particular staff. This could be because the student does not know the names of the above individuals, or because the student was not asked for the names of the staff by the DOS. The student was informed that the student could file a report with UCPD, and was also informed that information would be shared with UCPD by the DOS. The student did not request that the DOS contact UCPD. However, given the concerns raised, the DOS is informing UCPD.

NOTE:
Penal Code 148.6 PC states, "Every person who files any allegation of misconduct against any peace officer, as defined in Chapter 4.5 (commencing with Section 830) of Title 3 of Part 2, knowing the allegation to be false, is guilty of a misdemeanor."

YOU HAVE THE RIGHT TO MAKE A COMPLAINT AGAINST A POLICE OFFICER FOR ANY IMPROPER POLICE CONDUCT. CALIFORNIA LAW REQUIRES THIS AGENCY TO HAVE A PROCEDURE TO INVESTIGATE CIVILIANS' COMPLAINTS. YOU HAVE A RIGHT TO A WRITTEN DESCRIPTION OF THIS PROCEDURE. THIS AGENCY MAY FIND AFTER INVESTIGATION THAT THERE IS NOT ENOUGH EVIDENCE TO WARRANT ACTION ON YOUR COMPLAINT; EVEN IF THAT IS THE CASE, YOU HAVE THE RIGHT TO MAKE THE COMPLAINT AND HAVE IT INVESTIGATED IF YOU BELIEVE AN OFFICER BEHAVED IMPROPERLY. CIVILIAN COMPLAINTS AND ANY REPORTS OR FINDINGS RELATING TO COMPLAINTS MUST BE RETAINED BY THIS AGENCY FOR AT LEAST FIVE YEARS.

IT IS AGAINST THE LAW TO MAKE A COMPLAINT THAT YOU KNOW TO BE FALSE. IF YOU MAKE A COMPLAINT

10/12/2025

UNIVERSITY OF CALIFORNIA, LOS ANGELES POLICE DEPARTMENT

COMPLAINT FROM MEMBER OF THE PUBLIC

AGAINST AN OFFICER KNOWING THAT IT IS FALSE, YOU CAN BE PROSECUTED ON A MISDEMEANOR CHARGE.

I CERTIFY THAT THE INFORMATION PROVIDED BY ME IS TRUE AND CORRECT AND THAT I HAVE READ AND UNDERSTOOD THE ABOVE STATEMENT.

Complainant's Signature | Date

☐ FORWARD FOR INVESTIGATION ☐ RESOLVED BY SUPERVISOR

(Revised 1/3/23)

10/12/2026

From: Hakopiannik, Anashe
To: Nieves, Benito; Ovalle-Stevenson, Adriana; Rush, Jasmine
Cc: Toscano, Carmen; Lambey, Brianna; Saucedo, Vanessa; Srinivas, Sanjeev
Subject: RE: Student Concerns about Discrimination
Date: Wednesday, June 11, 2025 1:20:04 PM
Attachments: image002.png
image003.png

Thank you, we will send outreach.

Best,
Anashe

Anashe Hakopiannik
Intake Specialist
UCLA Civil Rights Office
Staff Diversity & EEO Compliance
ahakopiannik@equity.ucla.edu
T: (310) 794-0691 F: (310) 794-2800

-

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From: Nieves, Benito <bnieves@saonet.ucla.edu>
Sent: Wednesday, June 11, 2025 11:36 AM
To: Hakopiannik, Anashe <ahakopiannik@equity.ucla.edu>; Ovalle-Stevenson, Adriana <aovalle@equity.ucla.edu>; Rush, Jasmine <jrush@saonet.ucla.edu>
Cc: Toscano, Carmen <ctoscano@equity.ucla.edu>; Lambey, Brianna <blambey@saonet.ucla.edu>; Saucedo, Vanessa <vsaucedo@equity.ucla.edu>; Srinivas, Sanjeev <ssrinivas@equity.ucla.edu>
Subject: Re: Student Concerns about Discrimination

Dear Anashe,

Here is the student's email: dkupsh@ucla.edu

Thank you for the support of the student.

Best,

Benito Nieves
Interim Director, Office of Student Conduct
Associate Dean of Students, Office of the Dean of Students
1104 Murphy Hall
Los Angeles, CA 90095

10/17/2025

UCLA

Main: 310-825-3871
Direct: 310-825-1589
Email: bnieves@saonet.ucla.edu

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From: Hakopiannik, Anashe <ahakopiannik@equity.ucla.edu>
Sent: Wednesday, June 11, 2025 10:56 AM
To: Ovalle-Stevenson, Adriana <aovalle@equity.ucla.edu>; Rush, Jasmine <jrush@saonet.ucla.edu>
Cc: Toscano, Carmen <ctoscano@equity.ucla.edu>; Nieves, Benito <bnieves@saonet.ucla.edu>; Lambey, Brianna <blambey@saonet.ucla.edu>; Saucedo, Vanessa <vsaucedo@equity.ucla.edu>; Srinivas, Sanjeev <ssrinivas@equity.ucla.edu>
Subject: RE: Student Concerns about Discrimination

Thank you, Adriana.

SD&C does not have access to the student's email. If we can please get the student's contact information, I am happy to reach out.

Thanks,
Anashe

Anashe Hakopiannik
Intake Specialist
UCLA Civil Rights Office
Staff Diversity & EEO Compliance
ahakopiannik@equity.ucla.edu
T: (310) 794-0691 F: (310) 794-2800

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10/12/2025

From: Ovalle-Stevenson, Adriana <aovalle@equity.ucla.edu>
Sent: Tuesday, June 10, 2025 9:20 PM
To: Rush, Jasmine <jrush@saonet.ucla.edu>
Cc: Toscano, Carmen <ctoscano@equity.ucla.edu>; Nieves, Benito <bnieves@saonet.ucla.edu>; Lambey, Brianna <blambey@saonet.ucla.edu>; Saucedo, Vanessa <vsaucedo@equity.ucla.edu>; Hakopiannik, Anashe <ahakopiannik@equity.ucla.edu>; Srinivas, Sanjeev

<ssrinivas@equity.ucla.edu>
Subject: Re: Student Concerns about Discrimination

Hi Jasmine,

Thank you for sharing this information. It appears likely that the attached email might be related to the concerns you sent over, though it seems that there may be more potential respondents.

Given some of the references to UCLA staff, I'm going to ask SD&C to send Dylan outreach to try to learn more.

Thank you,
Adriana

From: Rush, Jasmine <jrush@saonet.ucla.edu>
Sent: Tuesday, June 10, 2025 6:28 PM
To: Ovalle-Stevenson, Adriana <aovalle@equity.ucla.edu>
Cc: Toscano, Carmen <ctoscano@equity.ucla.edu>; Nieves, Benito <bnieves@saonet.ucla.edu>; Lambey, Brianna <blambey@saonet.ucla.edu>
Subject: Student Concerns about Discrimination

Dear Adriana,

Today, during a meeting with student Dylan Kupsh, he shared that he has encountered harassment, violence, doxing, and assault by persons within and outside of the UCLA community. Dylan shared that he believes these actions are occurring in part due to his support of Palestine. Dylan included the following:

- that persons are contacting his family, and they too are the recipients of negative behaviors by those intending to harm Dylan
- that his advisor has received communications similar to the above
- that if he reports harassment, it has and could result in Dylan being accused of misconduct
- that UCPD and Security have watched and yelled at him on campus, and on one occasion, a Security staff member held up the staff member's phone and changed the photo to a photo of Dylan at 11 years old
    - I shared this with UCPD today
- that unnamed people have taken video of him and watched him
- that reports are being filed with OSC by non-affiliates for situations such has Dylan writing an op-ed (an example of an attempt to disrupt his experience and harass him)
- that the conduct process has been utilized as a mechanism to delay or prevent his ability to progress as a student at UCLA

Dylan did not provide the names of specific persons, which may be because he 1) does not know the names of some, 2) was not asked at the meeting, or 3) did not feel comfortable sharing this information (these are my assumptions). Please note that the above points are summaries of what I believe I heard, and not direct quotes from the student.

Although he is aware of resources, he is concerned about the above, as he said it has been

occurring for over a year.

Sincerely,
Jasmine

Jasmine JS Rush
Dean of Students
Office of the Dean of Students
Student Affairs
1104 Murphy Hall, Box 951415
Los Angeles, CA 90095-1415

UCLA

Main: 310-825-3871
Direct: 310-825-3895
Fax: 310-825-8616
Email: jrush@saonet.ucla.edu

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10/12/2016

EXHIBIT U

UNIVERSITY OF CALIFORNIA, LOS ANGELES **UCLA**

BERKELEY • DAVIS • IRVINE • LOS ANGELES • MERCED • RIVERSIDE • SAN DIEGO • SAN FRANCISCO SANTA BARBARA • SANTA CRUZ

OFFICE OF STUDENT CONDUCT
1104 MURPHY HALL
BOX 951415
LOS ANGELES, CA 90095-1405

June 06, 2025

Notice of Student Conduct Matter & Interim Suspension and Exclusion

CONFIDENTIAL

Dylan Kupsh
dkupsh@ucla.edu
Log Number: 03296-001-2025

Dear Dylan,

The Office of Student Conduct has received information indicating that you may have been involved in incidents which violate University regulations regarding student conduct. Specifically, it has been reported that on multiple occasions during the 2024/2025 Academic year, you engaged in behavior that is disruptive activity incompatible with the orderly operation of the campus. Specifically, in incident one, it is alleged that on or around May 15, 2025, near or around Dickson Court North, at approximately 11:57 a.m., you were part of a group that was using a small speaker and microphone system and several bullhorns. It is further reported that around 12:25 p.m., the group continued to use amplified sound and UCLA Student Affairs Mitigators (SAMs) requested that the group cease using amplified sound or relocate to a designated area for public expression. Additionally, it is reported the group moved near Royce Quad and resumed using amplified sound, hanging banners from trees and erecting a structure described as a "Yaffa." It is also reported that the group moved from Janss Steps and gathered in front of the Luskin Conference Center, where the group continued to hand banners. It is also reported, that you were observed by SAMs engaging in delay tactics, such as placing yourself in front of SAMs, walking slowly to impede progress and repeatedly asking questions in an apparent attempt to distract or delay. Lastly, it is reported that you failed to present student identification upon request.

If these allegations are true, your behavior may be in violation of Sections 102.07 (Violations of University Policy) [in reference to UCLA's Policy 850: General Use of UCLA Property and Policy 852: UCLA Interim Policy 852: Public Expression Activities], 102.13 (Obstruction or Disruption), 102.14 (Disorderly Behavior), 102.16 (Failure to Comply) of the UCLA Student Conduct Code. Please contact me at **bmurotake@saonet.ucla.edu** on or before **June 13, 2025**, to schedule a phone or Zoom appointment with me with regard to these matters.

Including this matter, there are five student conduct matters involving you under review. The other matters include the following:

• On June 10, 2024, you participated in setting up an unauthorized encampment in the courtyard between Dodd Hall and the UCLA School of Law building, and did so after having been warned and ordered by University officials to disperse and leave the campus. Additionally, it is reported that the encampment you were a part of disrupted an academic exam and restricted the movements of staff and students in and/or around Dodd Hall. Accordingly, on August 29, 2024, the Office of Student Conduct notified you that a student conduct matter was being initiated in connect with the report. In that proceeding, the following violations are being examined: 102.13 (Obstruction or Disruption), 102.14 (Disorderly Behavior), 102.15 (Disturbing the Peace), and 102.16 (Failure to Comply).

• On or around June 10, 2024, in a campus public space near Young Hall, you blocked the free flow of campus pedestrian traffic by blocking a student's access to a space on or around Young Hall. On February 6, 2025, the Office of Student Conduct notified you that a student conduct matter was being initiated in connection with the report. In that proceeding, the following violations are being examined: 102.07 (Violations of University Policy).

• On or around November 19, 2024, near Bruin Walk, Ackerman Union, and the Student Activities Center, you participated in a human blockade that blocked all east and westbound pedestrian traffic on Bruin Walk. On February 6, 2025, the Office of Student Conduct notified you that a student conduct matter was being imitated in connection with

the report. In that proceeding, the following violations are being examined: 102.07 (Violations of University Policy).

• On February 12, 2025, the student group Graudate Students for Justice in Palestine (GSJP), for which you serve as a signatory, received notice that the student group was placed on Interim Suspension and was directed to cease all activities. In contravention of the Interim Suspension, it was reported that on February 18, 2025, SJP promoted and participated in an unauthorized event that took place on campus on or around Royce Quad. Specifically, it was reported the SJP promoted the event on Instagram with the language "We will meet at Royce Quad at 2:00 PM on Tuesday, Feb. 18 to make our voices heard. We hope to see you there." As a signatory for the student group, and in accordance under UCLA Regulations on Activities, Registered Campus Organizations and Use of University Properties, the Regulations provide that Authorized Representatives of a student group "assume full responsibility for the actions and activities of the Organization" (Section III.A.1.b) and "assume...individual responsibility along with the organization for the planning and conduct of the Organization's activities" (Section II.A.4) (collectively, the "UCLA Regulations on RSO Signatories"). Accordingly, on February 28, 2025, the Office of Student Conduct notified you that a student conduct matter was being initiated in connection with the report. In that proceeding, the following violations are being examined: 102.16 (Failure to Comply).

Additionally, based on the above information, it has been determined that there is reasonable cause to believe that your participation in University activities or presence on campus will lead to other disruptive activity incompatible with the orderly operation of the campus.

Accordingly, pursuant to Section IV.A. and Section IV.B. of the Student Conduct Code, you are hereby placed on Interim Suspension and Exclusion from UCLA effective immediately, pending resolution of the allegations stemming from the incidents described above. Until the charges are resolved by University procedures described in the UCLA Student Conduct Code, you are prohibited from coming to campus, attending classes, and you are prohibited from attending any off- campus UCLA functions, activities or events and from entering any University-owned, -operated, or -leased housing or other facilities, without prior written permission from the Office of Student Conduct. You will not be permitted to be present on the UCLA campus for any purpose, with the exception of utilizing medical facilities at UCLA Medical Plaza 100-300 and Ronald Reagan Hospital, and accessing the UC Police Department station.

If it is necessary for you to gain entry to any of the above areas for official business purposes, please contact the Office of Student Conduct prior to attempting to gain entry. Any request for entry must be such that your physical presence is required in order to complete the task. The Office of Student Conduct will consider your request in conjunction with the appropriate University Officials, and determine under which circumstances, if any, it is appropriate for you to enter. Please submit your request in writing to Assistant Dean of Students, Bryan Murotake, at **bmurotake@saonet.ucla.edu**. This request should include the date and time that you wish to enter the restricted area, as well as your reason(s) for requesting access. All access requests must be submitted seven business days prior to the date that you plan to enter the area, unless an exception is granted.

You may appeal this Interim Suspension and Exclusion by requesting a special hearing with the Dean of Students, Jasmine Rush (or designee), 1104 Murphy Hall (310-825-3894) to review the necessity of the Interim Suspension. This hearing shall be given scheduling priority. You may be assisted at the hearing by a representative of your own choosing and at your own expense. You may present information in support of the contention that the Interim Suspension is unnecessary or that its conditions should be modified. The result of this hearing will have no bearing on the University student conduct proceedings related to the conduct which gave rise to the Interim Suspension and Exclusion.

It is important to familiarize yourself with the UCLA Student Conduct Code. Specifically, you may wish to refer to Section III of the Code, entitled Student Conduct Procedures. The UCLA Student Conduct Code may be accessed on the internet at www.deanofstudents.ucla.edu. To learn more about resources and support that is available to you, please click here.

If you would like support from a counselor, please contact Counseling and Psychological Services (CAPS) at (310) 825-0768 or http://www.counseling.ucla.edu/ to schedule an appointment. Please be assured that the conversations you have with a CAPS counselor are confidential and cannot be shared with the University unless you provide written release to do so.

Your Right to an Advisor

You have the right to select an Advisor of your choice or request the campus to provide an Advisor to you. You may also elect to proceed without an Advisor. Please review the attached "Advisor Authorization Form" about the role of an Advisor.

Option 1: No Selection of an Advisor

6/12/2025

If you elect to not have an Advisor join you at your meeting, please visit the Appointment Scheduler on or before **June 2, 2025**, and schedule an appointment with me. During our meeting, you will be given the opportunity to explain this situation from your perspective. Please contact the Office of Student Conduct at (310) 825-3871 should you experience an issue with scheduling an appointment.

Option 2: Selecting an Advisor of your choice

If you choose to select your own Advisor, please complete the "Student Conduct Advisor Authorization Form" and submit the completed form to me at **bmurotake@saonet.ucla.edu** at least two business days prior to your scheduled meeting. Visit the Appointment Scheduler to set up a meeting with me. Your selected Advisor will receive written training materials by email prior to your scheduled meeting. Please note that if you do not timely submit a completed "Student Conduct Advisor Authorization Form" prior to the scheduled meeting, the Advisor will not be permitted to join the meeting, and this may result in postponement of the meeting.

Option 3: Request an Advisor to be Provided

If you choose to have the campus provide you with an Advisor, please contact the Office of the Dean of Students at (310) 825-3871 to schedule an appointment with me, specifying that you are requesting a campus-provided Advisor to join you for this meeting. Please note that a meeting scheduled in this way may reflect a 5 - 10 business day window after the date of scheduling. The Office of the Dean of Students will inform you of the Advisor who has been appointed to assist you; and you will need to complete the "Student Conduct Advisor Authorization Form" for the appointed Advisor and submit the completed form to me at **bmurotake@saonet.ucla.edu** prior to your scheduled meeting. Please note that if you do not timely submit a completed "Student Conduct Advisor Authorization Form" prior to the scheduled meeting, the Advisor will not be permitted to join the meeting, and this may result in postponement of the meeting.

Please be advised that no degree may be conferred until any pending allegations and any assigned sanctions and conditions have been completed. Additionally, if you fail to schedule an appointment by **June 13, 2025**, or miss your scheduled appointment, a hold will be placed on your student records and registration. This hold will prevent you from registering in subsequent academic terms, graduating, or from obtaining transcripts, records or grades from the Office of the Registrar. It will also prohibit access to the Wooden Center and limit your use of library services.
Sincerely,

Bryan Murotake

Bryan Murotake
Assistant Dean of Students

cc: Jasmine Rush, Dean of Students
Benito Nieves, Associate Dean of Students
Estrella Arciba, Assistant Dean of Academic & Postdoctoral Services

10/12/2025

EXHIBIT V

10/12/2026

UNIVERSITY OF CALIFORNIA, LOS ANGELES

UCLA

BERKELEY • DAVIS • IRVINE • LOS ANGELES • MERCED • RIVERSIDE • SAN DIEGO • SAN FRANCISCO

SANTA BARBARA • SANTA CRUZ

OFFICE OF THE DEAN OF STUDENTS
1104 MURPHY HALL
BOX 951415
LOS ANGELES, CA 90095-1405

June 18, 2025

CONFIDENTIAL

Dylan Kupsh
dkupsh@ucla.edu
Log Number: 03296-2025

Dear Dylan:

I have considered the information you shared in support of your appeal of the Interim Suspension and Exclusion, which was imposed by the University on June 6, 2025.

During our June 10, 2025, meeting, you shared concerns about the student conduct allegations; you indicated that you did not violate University policy; and you expressed concern that the Interim Suspension and Exclusion would impact your ability to maintain satisfactory progress as a researcher, should it remain in place. You later provided several documents including statements from University faculty and staff, and information regarding your Summer 2025 TAship.

After reviewing the information that you provided, and upon further consultation related to your academic requirements, I am granting a modification to the Interim Suspension and Exclusion so that you may participate in research during the Summer 2025 Quarter with your advisor, Computer Science professor, Dr. [redacted], as follows:

- You are permitted to be on-campus on Mondays only, from 12:00pm-6:00pm, between June 23, 2025-September 22, 2025, to work directly with Dr. [redacted] and your lab mates in Engineering VI, [redacted], for research purposes.
- You are not permitted to be in any other campus location.
- You may not be on-campus more than 30 minutes prior to the start of your meeting with [redacted] and your lab mates.
- You must exit campus within 30 minutes of the completion of your last meeting with Dr. [redacted] and your lab mates.

If your Summer 2025 Monday meeting schedule is amended, and the change includes a campus access requirement, you must inform Assistant Dean Murotake via email within 48 hours of the amendment. Upon receipt, an assessment will be completed to determine if the Interim Suspension and Exclusion should be modified in response to this change.

With respect to your Summer 2025 TA duties and responsibilities, your Department Chair has confirmed that the position is fully online, including lectures, TA discussion sections, and office hours.

With the exception of the Monday meetings with Dr. [redacted] and your lab mates between June 23, 2025-September 22, 2025, **all other interim measures referred to in your letter from Assistant Dean of Students, Bryan Murotake remain in place.**

This includes that you are prohibited, without prior written permission from the Office of Student Conduct, from (a) coming to campus; (b) attending any off-campus UCLA functions, activities or events; and (c) entering any University- owned, -operated, or -leased housing or other facilities. You will not be permitted to be present on the UCLA campus for any purpose, with the exception of utilizing medical facilities at UCLA Medical Plaza 100-300 and Ronald Reagan Hospital, and accessing the UC Police Department station.

As a reminder, if it is necessary for you to gain entry to any of the above areas for official business purposes, please contact the Office of Student Conduct prior to attempting to gain entry. Any request for entry must be such that your physical presence is required in order to complete the task. The Office of Student Conduct will consider your request in conjunction with the appropriate University Officials, and determine under which circumstances, if any, it is appropriate for you to enter. Please submit your request in writing to **Assistant Dean of Students, Bryan Murotake, at** bmurotake@saonet.ucla.edu

This request should include the date and time that you wish to enter the restricted area, as well as your reason(s) for requesting access. All access requests must be submitted seven business days prior to the date that you plan to enter the area, unless an exception is granted.

If it is determined that you have failed to comply with the Interim Suspension and Exclusion, including the above modifications, you may be

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subject to disciplinary action.

Although this is the final decision in the Interim Suspension and Exclusion appeal process at this time, should more information become available in relation to the factors that gave rise to the imposition of the Interim Suspension and Exclusion, Assistant Dean of Students, Bryan Murotake, will continue to evaluate the appropriateness of maintaining the Interim Suspension and Exclusion. In particular, the appropriateness of maintaining this modified Interim Suspension and Exclusion will be re-evaluated each quarter based on your academic program requirements, including your schedule, as well as following final resolutions for each of your pending conduct matters.

Please refer to the UCLA Student Conduct Code for details on our Student Conduct policies and procedures.

If you have any questions about the Student Conduct policies and procedures, please direct them to Assistant Dean Murotake.

Sincerely,

Jasmine JS Rush
Dean of Students

cc: Bryan Murotake, Assistant Dean of Students