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**Young Americans for Liberty at
University of California, Berkeley** an
unincorporated association on behalf of itself
and its members; and Khader Kakish,

Plaintiffs,

v.

Janet Napolitano, in her official capacity as
President of the University of California and
in her individual capacity;
Carol Christ, in her official capacity as
Chancellor of the University of California,
Berkeley, and in her individual capacity;
Stephen Sutton, in his official capacity as
Interim Vice Chancellor of Student Affairs of
the University of California, Berkeley, and in
his individual capacity; and
Anthony Garrison, in his official capacity
as LEAD Center Director at University of
California, Berkeley,

Defendants.

CASE NO. 3:17-cv-06899-JD

**FIRST AMENDED VERIFIED
COMPLAINT FOR DECLARATORY
AND INJUNCTIVE RELIEF AND
DAMAGES**

DEMAND FOR JURY TRIAL

* Appearing *pro hac vice*.

1 Plaintiffs, Young Americans for Liberty at University of California, Berkeley, an
2 unincorporated association, on behalf of itself and its members, and Khader Kakish, by and
3 through counsel, and for their Complaint against Defendants aver the following:

4 **I.**

5 **INTRODUCTION**

6 1. Public universities are supposed to be a “marketplace of ideas,” where the young
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IV.

IDENTIFICATION OF PLAINTIFF

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1 31. Defendant Napolitano has responsibility and authority over the Berkeley budget
2 and allocation of monies within Berkeley, including the assessment of mandatory student fees
3 and the allocation of Berkeley Campus Fee revenues to student organizations.

4 32. Defendant Napolitano possesses the authority to change and is responsible for
5 enforcement of the RSO Recognition Policy and the RSO Funding Policy.

6 33. Defendant Napolitano enforces the RSO Recognition Policy in an
7 unconstitutional manner because she permits University officials to exercise unbridled discretion
8 in implementing the RSO Recognition Policy, has permitted YAL to be denied recognition under

9 Napolitano Na8ano

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1 59. This form requires a “Statement of Uniqueness.”

2 60. The “Statement of Uniqueness” is separate from the mission statement, and is
3 used by Defendants in their decision to approve or deny an application in order to “clarify how
4 your proposed organization is different from other existing student organizations at UC Berkeley
5 and how your group will have a positive impact on the university community.”

6 61. Defendants and/or state actors under Defendants’ authority and control, determine
7 whether a proposed RSO is “too similar” to an already recognized RSO.

8 62. On information and belief, Defendants do not maintain a list of objective, content
9 and/or viewpoint neutral criteria by which to determine when an organization is “too similar” to
10 an already registered RSO.

11 63. If Defendants, and/or state actors under Defendants’ authority and control,
12 determine that an applicant is “too similar” to another RSO the RSO policy requires that they
13 deny the application.

14 64. Defendants and/or state actors under Defendants’ authority and control, determine
15 whether a proposed RSO “will have a positive impact on the university community.”

16 65. On information and belief, Defendants do not maintain a list of objective, content
17 and/or viewpoint neutral criteria by which to determine when an organization is “will have a
18 positive impact on the university community.”

19 66. Many of the approved RSOs have overlapping missions and goals; some appear
20 almost identical such as the “Cal Berkeley Democrats” and “Students for Hillary at Berkeley,” or
21 “Progressive Student Association” and “Socialist Alternative at Berkeley”, or “Queer Alliance &
22 Resource Center,” the “Queer Student Union,” and the “UNITY Resource Center.”

23 67. On information and belief, Defendants’ RSO Policy does not provide that any
24 recording be made or provided of the deliberations on whether to grant or deny RSO status.

25 68. The RSO Policy states that “[i]n the event that you are not approved to create a
26 new organization you may be redirected to a similar student organization or be given alternative
27 steps in order to achieving your desired outcome.” (Exhibit 1).

28 69. The RSO Policy requires re-registration each year for every RSO.

1 70. On information and belief, Defendants do not maintain a list of objective, content
2 and/or viewpoint neutral criteria by which to determine whether to approve or deny an RSOs re-
3 registration application.

4 71. The RSO Policy permits Defendants, without limit, to deny an RSO recognition
5 or re-recognition based on the RSO’s viewpoint, including whether it is deemed to be “too
6 similar” to another organization, or whether it is determined to have a “positive impact” on the
7 Berkeley community.

8 **Defendants’ Registered Student Organization Funding Policy**

9 72. Defendants create a forum for students’ expression by collecting student fees
10 designated for re-distribution to RSOs.

11 73. Every student member of Plaintiff YAL pays mandatory student fees at Berkeley.

12 74. Plaintiff Kakish, a member of YAL, pays mandatory student fees at Berkeley.

13 75. A2(it5)-2(2Tj /TT0 1 Tf 0.)telA2.02 Td [(D)(.)]b2 /TT1 1 Tf [(A2 0.004 Twv0u)6r(1e)-1

1 receiving RSO funding by denying them RSO status initially or through the re-recognition
2 process.

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1 92. Because Defendants denied YAL's application, YAL was unable to reserve
2 facilities for events to further its mission on the same basis as RSOs.

3 93. Because Defendants denied YAL's application, YAL members were unable to
4 freely associate together on the same basis as other students whose organizations have been
5 granted RSO status and advocate for their ideas on campus.

6 94. Because Defendants denied YAL's application, YAL was limited in its ability to
7 speak on campus and further its mission and goals and to recruit members.

8 95. Defendants' denial of YAL's application burdens YAL's speech.

9 96. Defendants' denial of YAL's application burdened YAL expressive association.

10 97. Defendants' denial of YAL's application burdened YAL's association.

11 98. As a result of its denial of RSO status, YAL was forced to replace any student fee
12 funding it would have received through other sources, including its members' own personal
13 resources. However, YAL members were compelled to continue to pay student fees that may be
14 accessed by and used to promote the ideas of those whose RSO status has been granted –
15 including groups advocating for views contrary to those of YAL and its members.

16 99. YAL has suffered actual damages by being denied access to RSO funding and
17 thus expending funds in excess of \$50 that would have been covered by RSO funds.

18 100. YAL's members, including Plaintiff Kakish, have suffered actual damages by
19 being forced to pay into a system of unconstitutionally administered student fees, including the
20 fees payed by each member every semester the viewpoint-discriminatory RSO recognition policy
21 remains in place.

22 101. YAL members have also expended personal funds out of pocket on behalf of
23 YAL to further YAL's mission and assist in membership recruitment. These expenses would
24 have been covered by RSO funds.

25 102. Due to out of pocket expenses paid by YAL members on behalf of YAL, and due
26 to the payment of unconstitutionally administered fees by each member of YAL, Defendants'
27 actions have caused actual damages to Plaintiffs and Plaintiff YAL's members in excess of \$100,
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1 and Defendants’ actions continue to cause actual damage to Plaintiffs and Plaintiff YAL’s
2 members.

3 103. Were it afforded RSO status for the Fall 2017 semester, YAL would have availed
4 itself of the benefits, privileges, and channels of communication available to RSOs, including
5 applying for funding from the fees reserved for RSOs but was denied access to these speech
6 forums.

7 104. In response to the original verified complaint filed in this case on December 4,
8 2017 (Doc. 1), Defendants agreed to recognize YAL for the Spring 2018 semester despite their
9 initial determination that YAL “does not meet the qualifications for creating a new organization”
10 because it “is too similar to Cal Libertarians.”

11 105. Defendants’ viewpoint-discriminatory policies remain in place.

12 106. Plaintiffs continue to be compelled to pay mandatory fees that are distributed
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1 112. Defendants knew or should have known that by requiring the members of YAL to
2 pay student activity fees for the support of groups whose views they do not wish to support while
3 funding groups with those funds through a content and/or viewpoint discriminatory system that
4 affords unbridled discretion to allocate student activity fees, Defendants violated, and continue to
5 violate, Plaintiffs' constitutional rights.

6 **VIII.**

7 **FIRST CAUSE OF ACTION –**
8 **VIOLATION OF PLAINTIFFS' FIRST AMENDMENT RIGHT OF ASSOCIATION**

9 113. The allegations contained in paragraphs 1 to 112 are incorporated herein by
10 reference.

11 114. The First Amendment of the United States Constitution, incorporated and made
12 applicable to Defendants through the Fourteenth Amendment, guarantees Plaintiffs the right of
13 association.

14 115. A University's denial of registration of a student organization without sufficient
15 lawful justification burdens and abridges the right of association.

16 116. A University's denial of a student group's access to meeting space and other
17 benefits and privileges of registration, including the channels of communication available to
18 other student groups on its campus, burdens and abridges the right of association.

19 117. Once a student group files a completed application for registered status with a
20 University, the burden is upon the University to justify rejection of the application.

21 118. The denial of registered student organization status to a student organization is a
22 form of prior restraint, placing a heavy burden on the University to justify its denial of
23 registration.

24 119. The content and/or viewpoint of a student group's expression or purpose for
25 association is an invalid basis for denying a student group registration.

26 120. Defendants denied YAL's timely and complete application (the "New
27 Organization Interest Form") for RSO status.

121. Defendants' stated justification for the denial was based on YAL's viewpoints

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1 138. A public university may not apply content and/or viewpoint-based standards in
2 registering student organizations.

3 139. The RSO Policy creates a public forum for student speech.

4 140. The RSO Policy affords Defendants and other University officials unbridled
5 discretion to grant or deny registration to a student group, permitting discrimination against a
6 student group because of the content and/or viewpoint of its speech.

7 141. The lack of objective criteria, factors, or standards for determining whether a
8 group may be an RSO and participate in that forum for student speech gives government officials
9 unbridled discretion to exclude or prohibit speech based on its content and/or viewpoint in
10 violation of the First Amendment.

11 142. Defendants' RSO Policy confers unbridled discretion on Defendants or other
12 officials charged with determining whether a student group will be granted RSO status to
13 suppress and/or discriminate against disfavored speech because of its content and/or viewpoints.

14 143. Defendants' RSO Policy does not provide that any recording be made or provided
15 of the deliberations on whether to grant or deny RSO status thus conferring unbridled discretion
16 on officials to discriminate based on content and/or viewpoint.

17 144. Denying YAL's application because it is "too similar" to another organization,
18 required Defendants to discriminate based on content and/or viewpoint in its determination.

19 145. Defendants' denial of YAL's application for registered student organization status
20 was viewpoint discriminatory.

21 146. Defendants' denial of registered student organization status to YAL and its
22 exclusion from receiving student activity funding served no sufficient and lawful purpose.

23 147. Accordingly, Defendants' RSO Policy, and their enforcement of this policy
24 against Plaintiffs violated Plaintiffs' rights to freedom of speech guaranteed by the First
25 Amendment.

26 148. Defendants' denial of YAL's application for RSO status fails to satisfy strict
27 scrutiny because it is not narrowly tailored to promote a compelling government interest.

1 149. Defendants' RSO Policy is not content and viewpoint neutral and does not leave
2 open ample alternative channels of communication.

3 150. Defendants' denial of YAL's application for registered student organization status
4 was unreasonable.

5 **Student Fee Allocation Policy**

6 151. The First Amendment's Free Speech Clause, incorporated and made applicable to
7 the states by the Fourteenth Amendment to the United States Constitution, prohibits a public
8 university from permitting viewpoint discriminatory allocation of student fee funding to RSOs.

9 152. When a public university collects mandatory student fees and allows registered
10 student organizations to apply for funding from those student fees, it creates a public forum for
11 student speech and expression.

12 153. Mandating students pay fees for the purpose of distribution to RSOs that speak
13 messages the students disagree with is unconstitutional compelled speech unless the funds are

14 151.

1 159. Defendants' Student Fee Policy and the exclusion of YAL from the opportunity to
2 apply for Student Fee funding fail to satisfy strict scrutiny because it is not narrowly tailored to
3 promote a compelling government interest.

4 160. Defendants' Student Fee Policy and the exclusion of YAL from the opportunity to
5 apply for Student Activity Fee funding is content and/or viewpoint discriminatory and
6 unreasonable.

7 161. The lack of objective criteria, factors, or standards for determining whether a
8 group may receive Student Fee funding and at what level gives government officials unbridled
9 discretion to exclude, prohibit, or disadvantage speech based on its content and/or viewpoint in
10 violation of the First Amendment.

11 162. Because Defendants discriminate based on content and/or viewpoint in
12 recognizing RSOs, and the RSO Policy serves as a gateway to access the mandatory student fees
13 paid by YAL members for distribution to RSOs, Defendants compel Plaintiff's members,
14 including Plaintiff Kakish, to speak a message by financially supporting RSOs whose message
15 they disagree with, since those funds are not distributed in a content and/or viewpoint neutral
16 manner.

17 163. Because of Defendants' actions, Plaintiffs and YAL members have suffered, and
18 continue to suffer, economic injury and irreparable harm. Plaintiffs are entitled to an award of
19 monetary damages and equitable relief.

20 164. Pursuant to 42 U.S.C. §§ 1983 and 1988, Plaintiffs are entitled to a declaration
21 that Defendants violated their First Amendment right to freedom of speech and an injunction
22 against Defendants' policy and actions. Additionally, Plaintiffs are entitled to damages in an
23 amount to be determined by the evidence and this Court and the reasonable costs of this lawsuit,
24 including its reasonable attorneys' fees.

X.

**THIRD CAUSE OF ACTION –
VIOLATION OF PLAINTIFFS’
FOURTEENTH AMENDMENT RIGHT TO EQUAL PROTECTION**

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4 165. The allegations contained in paragraphs 1 to 164 are incorporated herein by
5 reference.

6 166. The Fourteenth Amendment to the United States Constitution guarantees
7 Plaintiffs the equal protection of the laws, which prohibits Defendants from treating Plaintiffs
8 differently than similarly situated speakers or associations.

9 167. The government may not treat a person or association of persons disparately as
10 compared to similarly situated persons or associations when such disparate treatment burdens a
11 fundamental right, targets a suspect class, or has no rational basis.

12 168. Plaintiffs were similarly situated to other RSO-applicants at the University.

13 169. Plaintiffs were situated to other associations of students who are similar but not
14 identical to already recognized RSOs yet have been granted RSO status.

15 170. Defendants treated Plaintiff YAL and its members differently than other similarly
16 situated speakers on campus by denying Plaintiff YAL and its members access to speech forums
17 that similarly situated associations and students may access.

18 171. Defendants’ policies and actions disadvantaged Plaintiff YAL and its members by
19 limiting their ability to associate on an equal basis as other similarly situated associations and
20 students.

21 172. Defendants’ policies and actions disadvantaged Plaintiff YAL and its members by
22 limiting their ability to speak on an equal basis as other similarly situated associations and
23 students.

24 173. Defendants’ policies and actions disadvantaged Plaintiff YAL and its members by
25 limiting their ability to access speech forums on an equal basis as other similarly situated
26 associations and students.

27 174. Defendants’ policies and actions have caused Plaintiff YAL and its members
28 actual damages.

1 175. Defendants’ policies and actions violate Plaintiff YAL and its members’
2 fundamental right to association and free speech.

3 176. When government regulations, like Defendants’ policies and actions, infringe on
4 fundamental rights, discriminatory intent is presumed.

5 177. Defendants’ RSO Policies are underinclusive, prohibiting some speech and
6 association while permitting similarly situated speech and association by others students and
7 RSOs.

8 178. Defendants lack a rational or compelling state interest for such disparate treatment
9 of Plaintiff and its members.

10 179. Because of Defendants’ actions, Plaintiff YAL and its members have suffered,
11 and continue to suffer, economic injury and irreparable harm. Plaintiffs are entitled to an award
12 of monetary damages and equitable relief.

13 180. Pursuant to 42 U.S.C. §§ 1983 and 1988, Plaintiffs are entitled to a declaration
14 that Defendants violated their Fourteenth Amendment right to equal protection and an injunction
15 against Defendants’ policy and actions. Additionally, Plaintiffs are entitled to damages in an
16 amount to be determined by the evidence and this Court and the reasonable costs of this lawsuit,
17 including its reasonable attorneys’ fees.

18 **PRAYER FOR RELIEF**

19 WHEREFORE, Plaintiffs request the following relief:

- 20 A. A declaratory judgment that the Defendants’ RSO Policy, facially and as-applied,
21 violates Plaintiffs’ rights under the First and Fourteenth Amendment;
- 22 B. A declaratory judgment that the Defendants’ Student Fee Policy, facially and as-applied,
23 violates Plaintiffs’ rights under the First and Fourteenth Amendment;
- 24 C. An order enjoining the enforcement of Defendants’ prohibition on recognizing
25 organizations that Defendants consider “too similar” to other RSOs;
- 26 D. A preliminary and permanent injunction prohibiting Defendants from denying any
27 applicant RSO status without implementing a list of exhaustive viewpoint neutral criteria
28 for RSO recognition that adequately limits Defendants’ discretion;

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- E. A preliminary and permanent injunction prohibiting Defendants from collecting mandatory student fees for the purpose of funding RSOs without implementing a list of exhaustive viewpoint neutral criteria for funding distribution that adequately limits Defendants' discretion;
- F. Actual compe

Respectfully submitted on this, the 8th day of March, 2018,

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By: /s/ J. Caleb Dalton

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