

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

YUSUF HAFEZ,

Plaintiff,

v.

ACCURACY IN MEDIA, INC., and ADAM  
GUILLETTE,

Defendants.

INDEX NO.

**SUMMONS**

Plaintiff designates the County of New York  
as the County of Venue based on the location  
where the claim arose.

TO THE ABOVE-NAMED DEFENDANTS:

YOU ARE HEREBY SUMMONED and required to serve upon plaintiff's attorney,  
at his address stated below, an answer to the attached complaint.

If this summons was personally served upon you in the State of New York, the answer  
must be served within 20 days after such service of the summons, excluding the date of  
service.

If the summons was not personally delivered to you within the State of New York, the  
answer must be served within 30 days after service of the summons is complete as provided  
by law.

If you do not serve an answer to the attached complaint within the applicable time  
limitation, a judgment may be entered against you, by plaintiff, for the relief demanded in  
the complaint, without further notice to you.

The action will be heard in the Supreme Court of the State of New York, in and for  
the County of New York. This action is brought in the County of New York because it is the  
place in which the claim arose.

Dated: November 9, 2023  
New York, New York

Respectfully submitted,

BELDOCK LEVINE & HOFFMAN LLP  
99 Park Avenue, PH/26th Floor  
New York, New York 10016  
(212) 490-0400

By:



Jonathan C. Moore  
Luna Droubi  
Deema Azizi

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK**

YUSUF HAFEZ,

Plaintiff,

- against -

ACCURACY IN MEDIA, INC., and ADAM  
GUILLETTE,

Defendants.

**VERIFIED COMPLAINT**

INDEX NO.

Plaintiff YUSUF HAFEZ, by his attorneys BELDOCK LEVINE & HOFFMAN LLP, as and for his verified complaint against Defendants Accuracy in Media, Inc., and Adam Guillette, alleges as follows:

**PRELIMINARY STATEMENT**

1. This is an action for declaratory and injunctive relief and damages against Defendants Accuracy in Media, Inc. (“AIM”), and its president Adam Guillette who, by their actions, have unlawfully used Plaintiff’s name and likeness for commercial purposes without his consent, defamed Plaintiff, and intentionally caused him severe emotional distress by publishing and disseminating his photograph and name under the caption “Columbia’s Leading Antisemites.”
2. On October 23, 2023, Defendants Accuracy in Media, a purported “not for profit,” and Guillette, bought a domain name in Plaintiff’s name, created a website in Plaintiff’s name, and used his name and photograph to engage in a campaign falsely stating that Plaintiff was the leader of a student organization that signed on to a Letter regarding the current conflict in Israel/Palestine.
3. Plaintiff was not the leader of a student organization at the time the letter was

signed. In fact, he had no association with the letter.

4. The website, [www.yusufhafez.com](http://www.yusufhafez.com), remains up as of the filing of this Complaint.

5. The website not only falsely associates Plaintiff with the letter relating to the current conflict in Israel/Palestine but, in addition, includes a banner with the words “Columbia’s Leading Antisemites.”

6. In addition to the website, Defendants created, funded, and authorized a “mobile billboard” truck, displaying Plaintiff’s photograph and name (together with the logo for Accuracy in Media, Inc.) which has driven around the campus of Columbia University where students, including Plaintiff, are currently enrolled.

7. These actions have led to a massive amount of publicity for the Defendants which, upon information and belief, Defendants have used to promote and advertise AIM and solicit funds to support AIM and its president.

8. This conduct is a direct violation of New York law including, but not limited to, Civil Rights Law §§ 50 and 51.

9. This conduct, authorized by AIM’s president Defendant Guillette, has been engaged in intentionally with the goal of profiting AIM and its president by defaming and stigmatizing Plaintiff.

10. As recently as November 3, 2023, Accuracy in Media’s homepage, [www.aim.org](http://www.aim.org), has prominently featured a “donate” button, adjacent to a photograph of its advertising truck with its digital unauthorized displays of names and photographs, which it continues to send in and around Columbia University.

11. As described below, Plaintiff is concerned that his academic career and future employment prospects are now at risk, as well as his safety, due to Defendants’ unlawful,

outrageous and defamatory conduct.

### **PARTIES**

12. Plaintiff Yusuf Hafez is a Senior at Columbia University studying civil engineering who is scheduled to graduate in May of 2024.

13. Plaintiff is a citizen of the United States and a citizen and resident of the State of New York.

14. Defendant Accuracy in Media, Inc. is a Washington, D.C. based not-for-profit organization which, upon information and belief, is not authorized to do business in New York. It is registered with the Internal Revenue Service as a 501(c)(3) organization.

15. Defendant Adam Guillette is the president of Accuracy in Media, Inc. who has proactively authorized AIM's campaign to profit off the names and likenesses of university students and has directly solicited donations to continue the circulation of the mobile billboard truck baring Plaintiff's name and photograph in and around New York City.

### **FACTUAL ALLEGATIONS**

16. Plaintiff Yusuf Hafez had always aspired to attend Columbia University and become a civil engineer.

17. Plaintiff transferred to Columbia University as a sophomore, becoming a student in the Department of Civil Engineering and Engineering Mechanics in September of 2021.

18. Plaintiff joined Columbia's soccer team and became a member of a number of student groups.

19. As an Egyptian-American Muslim who was new to the university, one of the groups Plaintiff joined was an Arab cultural group called Turath.

20. During his junior year of college, from September 2022 until May 2023, Plaintiff

became president of Turath.

21. In May of 2023, Turath elected a new president. After May 2023, Plaintiff was no longer president of the organization and held no leadership or decision-making role on behalf of Turath.

22. In September 2023, Plaintiff returned to classes as a senior scheduled to graduate in May 2024 with a Bachelor's Degree in civil engineering.

**Creation of the Website [www.yusufhafez.com](http://www.yusufhafez.com)**

23. Defendant Accuracy in Media, Inc. was formed in 1969 and purports to use "citizen activism" and "investigative journalism" to expose media bias.

24. On or about October 11, 2023, a letter was disseminated to the Columbia University community relating to the recent and currently ongoing conflict in Israel/Palestine.

25. On October 23, 2023, Defendant Guillette announced on X (formerly known as Twitter) that AIM had "purchased domain names corresponding to the names of several affiliates featured on its lists" of purported "Anti-Semites."

26. On October 23, 2023, Defendants purchased the domain name [www.yusufhafez.com](http://www.yusufhafez.com).

27. The website features Plaintiff's name and photograph, as well as Columbia University's logo, with the header "Columbia's Leading Antisemites."

28. The yusefhafez.com website falsely claims that Plaintiff "Yusuf Hafez is a leader of an organization that signed this hateful, antisemitic letter."

29. The website falsely claims that Plaintiff was a "student signator[y]" of the letter.

30. Defendants did not obtain Plaintiff's consent prior to using his name or photograph on the website.

31. Also featured on the website is the Defendant organization's name "Accuracy in Media, Inc."

### **Digital Billboards**

32. On October 25, 2023 at approximately 10:00 am, Plaintiff was in class when he was alerted by a friend that his photograph was being displayed on a mobile billboard truck outside of Columbia University's main entrance in Morningside Heights in Manhattan.

33. The digital billboard displayed the words "Columbia's Leading Antisemites" and featured streaming photographs of a number of students including Plaintiff.

34. In addition to his photograph, the trucks displayed the website containing Plaintiff's name: [www.yusufhafez.com](http://www.yusufhafez.com).

35. Defendants did not obtain Plaintiff's consent prior to using his name, photograph or website on the truck.



36. Also featured on the truck was the organization's name "Accuracy in Media, Inc."

37. The truck was driven around Columbia University's campus from approximately 10:00am until 5:00pm.

38. On November 1, 2023, Defendants AIM and Guillette again authorized and directed the mobile billboard truck to return and drive around Columbia University's entrance.

39. The November 1 billboard truck again displayed Plaintiff's name, photograph, the website [www.yusufhafez.com](http://www.yusufhafez.com) and the "Accuracy in Media" logo.

40. On November 1, 2023, Defendant Guillette personally physically appeared at Columbia's campus to continue his defamatory advertising campaign and, upon information and belief, to solicit donations.

### **Accuracy in Media's Website**

41. At or about the same time, on October 28, 2023, Defendant AIM posted on its own website: "These are the names that Accuracy in Media was able to independently confirm as holding leadership roles within groups who signed" the letter relating to the current conflict in Israel/Palestine.

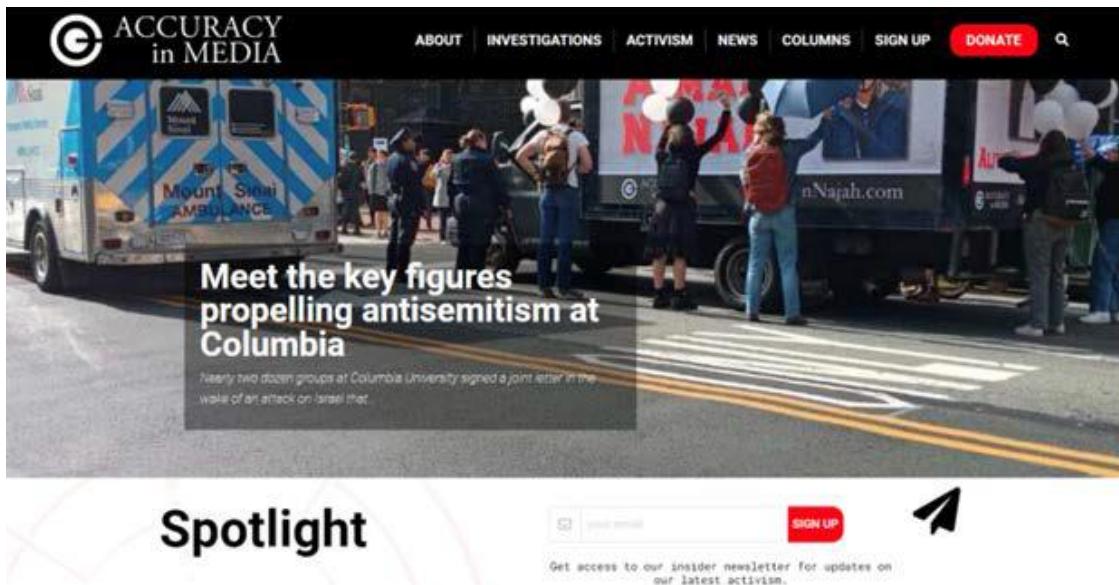
42. The AIM website names Plaintiff, among other students, falsely implying that he is the current President of Turath.

43. On the same page, the website states: "With one click, tell the Columbia Board of Trustees to take action against these despicable, hateful students."<sup>1</sup>

44. As of November 3, 2023, prominently featured on Defendant's website and homepage stated: "Meet the key figures propelling antisemitism at Columbia." Also on the website prominently featured is a button allowing individuals to "Donate."

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<sup>1</sup> <https://aim.org/2023/10/28/meet-the-key-figures-propelling-antisemitism-at-columbia/>



45. As noted above, throughout this time, and throughout the 2023-2024 school year, Plaintiff was not in a “leadership role” within Turath and had no involvement in any decision to sign or sign onto any letter.

### Adam Guillette

46. Defendant Adam Guillette, president of Defendant AIM, appears to be an avid user of X (formerly known as Twitter).

47. In furtherance of Defendants’ attempts to engage in commercial activity to Plaintiff’s detriment, as noted above, Defendants request “donations” in order to continue to fund “mobile billboards.”

48. As recently as November 7, 2023, Mr. Guillette was actively soliciting money on the basis of his false identification of Plaintiff via X (formerly known as Twitter). He wrote: “Want to enable @AccuracyInMedia to continue exposing antisemites? Any donations to this link will go directly towards our mobile billboards, research, domains, and geotargeted ads. Your gifts will enable us to put frowns on the faces of antisemites.”

49. Defendants AIM and Guillette continue to threaten the use of mobile billboard trucks “each week.”

50. Significantly, just days ago on November 8, 2023, Defendants indicated that New Yorkers will “now getting geotargeted ads” featuring Columbia students, including Plaintiff, “with the same message as the billboard.”

#### **Defendants’ Intentional and/or Reckless Disregard for the Truth**

51. Upon information and belief, Defendants identified Plaintiff as the president of Turath despite knowing that a new president had been elected effective May 2023.

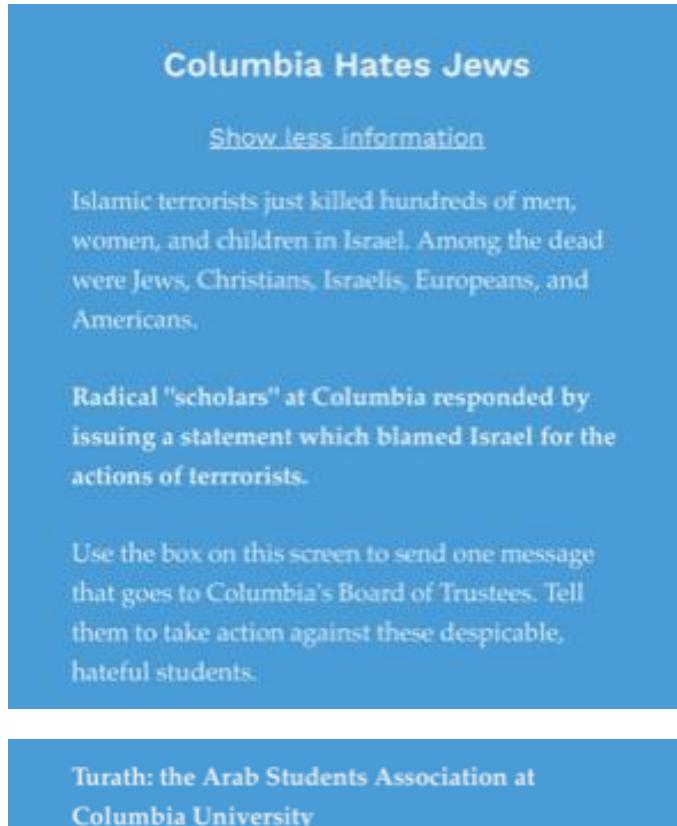
52. On October 31, 2023, in an interview with Fox News, Defendant Guillette stated of the students identified on AIM’s website and featured on the mobile billboard trucks, “we only go after the leaders of these organizations, not the casual members. We don’t share any of their private information. We just take their names and photos.”

53. Defendant Guillette knew or should have known that his statement was false.

54. On X (formerly known as Twitter), Defendant AIM retweeted the interview and added the caption, “We simply amplified the public statement that these students proudly signed.”

55. Defendant AIM’s statement was knowingly false.

56. The falsity of Defendants’ statements is demonstrated by the fact that from October 25, 2023 through November 1, 2023, Defendant AIM’s website had identified a different Columbia student, Yara Saabneh, as Turath leadership. Yara Saabneh is, in fact, as of May 2023, the current president of Turath.



57. Then, on November 1, 2023, Defendants removed the name of Yara Saabneh, the current Turath president, from AIM's website, leaving only the name of Plaintiff.

58. Defendants knew or should have known that Plaintiff was not the current president of Turath because the names of Turath's 2023-2024 leadership were publicly available at the time the Defendants first published the list and purchased the Domain names.

59. For example, in September of 2023, Turath's publicly available Instagram account listed the new Turath leadership, including Yara Saabneh as President.

60. Thus, on November 1, 2023, Defendants including, upon information and belief, Defendant Guillette, intentionally, knowingly, and deliberately modified AIM's website to falsely

identify Plaintiff as the current “President” of Turath, a “leading antisemite” and a “hateful” and “despicable student” despite knowing that his only leadership position with Turath had ended in the prior academic year.

61. Thus, AIM failed to conduct a reasonable investigation and intentionally failed to verify the current president of Turath.

62. Defendants’ statements were motivated by bias in seeking to accuse each and every student loosely associated with each student organization that signed the letter as antisemitic and hateful regardless of accuracy or truth.

63. As of today’s date the website, <https://aim.org/2023/10/28/meet-the-key-figures-propelling-antisemitism-at-columbia/>, continues to falsely list Plaintiff as “President” of Turath:

**Turath: The Arab Students Association at Columbia University**  
Yusuf Hafez, President

### **Irreparable Harm and Damages**

64. Since on or about October 25, 2023, the day the mobile truck first arrived at the Columbia campus displaying his photograph and name, Plaintiff has been suffering from shock, emotional and physical distress, and outright fear for his physical safety.

65. Plaintiff is in constant fear that Defendants’ trucks will appear and/or that someone will physically harm him or his family.

66. Because of his fears and emotional and physical distress, Plaintiff has been unable to go back to the Columbia campus, has been forced to attend classes remotely, and is unable to engage in his community groups, or social interactions.

67. Plaintiff’s academic career has already been adversely impacted by Defendants’

conduct. Specifically, he has been unable to take at least one exam, and his grades have suffered and will continue to suffer from his displacement from the university community.

68. Moreover, the continued existence of a public website and ongoing publicity identifying Plaintiff as an “antisemite” and falsely claiming Plaintiff signed a letter he did not sign will cause irreparable harm to his future career as the public record is readily accessible to potential employers.

69. Though he should be seeking employment after graduation, Plaintiff is unable to do so while the defamatory and false statements about him continue, including the continued existence of the unauthorized website using his name and likeness as well as the mobile billboard trucks.

70. If Defendants’ actions are not restrained, Plaintiff will continue to suffer damage, including fear of physical harm and loss of potential employment.

71. Defendant AIM is liable for the acts taken by its employees acting within the apparent scope of the authority entrusted to them, including but not limited to Defendant Guillette, its President.

72. As a result of Defendants’ acts, Plaintiff has suffered and will suffer damage, including threatened loss of his employment, economic loss, including back pay and future lost earnings and benefits, as well as damage to his personal and professional name, profession, career and reputation, mental and physical pain and suffering, emotional distress and mental anguish, embarrassment, indignity, inconvenience, and substantial dislocation in his personal and professional life.

73. Defendants and their agents have acted intentionally, in bad faith, with malice and with the specific intention to harm Plaintiff.

74. Plaintiff has no adequate remedy at law.

**JURISDICTION AND VENUE**

75. This suit is brought and jurisdiction lies in this Court in that Plaintiff's complaint arises from violations of New York State common law.

76. Venue is proper in that the unlawful acts of which plaintiff complains occurred in New York County.

**FIRST CAUSE OF ACTION**  
**Violation of N.Y. Civil Rights Law §§ 50 and 51**

77. Plaintiff realleges and incorporates by reference each and every allegation contained above as if fully set forth herein.

78. On or about October 23, 2023, Defendant Accuracy in Media, Inc., knowingly, and without Plaintiff's prior consent, violated Plaintiff's statutory right to privacy by purchasing a domain name in Plaintiff's name and creating a website using his name and photograph in an effort to solicit donations.

79. On October 24 through October 27, Defendants AIM and Adam Guillette, as president of Defendant AIM, knowingly and intentionally used Plaintiff's name and photograph without his consent for advertising and commercial purposes by sending mobile billboard truck(s) displaying Plaintiff's name and photograph, together with AIM's logo, to the Morningside Heights neighborhood of Manhattan within the State of New York where Plaintiff is a student.

80. On November 1, 2023, Defendants AIM and Adam Guillette, as president of Defendant AIM, knowingly and intentionally used Plaintiff's name and photograph, together with its logo, without Plaintiff's consent for advertising and commercial purposes by sending mobile billboards displaying Plaintiff's name and photograph to the Morningside Heights neighborhood of Manhattan within the State of New York where Plaintiff is a student.

81. Defendants have threatened to continue sending mobile advertising trucks displaying Plaintiff's name and likeness to the Morningside Heights neighborhood of Manhattan within the State of New York.

82. Defendants have used and are continuing to use Plaintiff's name and likeness for its own fund-raising, specifically to solicit donations for Defendants' own purposes.

83. Defendants' use of Plaintiff's name and likeness on an eponymous website as well as on mobile billboard trucks constitutes unlawful commercial use of Plaintiff's name and likeness in violation of New York Civil Rights Law.

84. Defendants' acts, both in concert and severally, have caused and are causing irreparable harm and damage to Plaintiff.

85. Unless preliminarily and permanently restrained by this Court, Defendants' conduct will continue to cause irreparable injury to Plaintiff.

86. As a result of the Defendants' knowing violation of the Civil Rights Law, punitive damages should be assessed against Defendants.

87. Plaintiff also seeks recovery of damages sustained as a result of Defendants' unlawful acts, together with an accounting of Defendants' profits arising from such activities.

88. By reason of the foregoing, Plaintiff has been damaged and seeks damages for a violation of Civil Rights Law §§ 50 and 51.

89. As a result of the Defendants' knowing violation of the Civil Rights Law, punitive damages should be assessed against Defendants.

### **SECOND CAUSE OF ACTION** **Defamation**

90. Plaintiff realleges and incorporates by reference each and every allegation contained above as if fully set forth herein.

91. As described in the foregoing paragraphs, on the morning of October 25, 2023, Defendants published a false statement on AIM's website, identifying Plaintiff (among others) and stating: "These are the names that Accuracy in Media was able to independently confirm as holding leadership roles within groups who signed the letter."

92. This statement was and is false. As of October 2023, Plaintiff did not hold a leadership role with a group who was identified as a signatory to the subject letter.

93. On October 25, 2023, Defendants created a website domain, [www.yusufhafez.com](http://www.yusufhafez.com), that includes a headline "Columbia's Leading Antisemites" and falsely states that Plaintiff is the "leader of an organization that signed this hateful, antisemitic letter."

94. This statement was and is false. Plaintiff is not the "leader" of Turath, a group which was identified as a signatory to the subject letter.

95. Defendants' statement that Plaintiff is the "leader" of Turath was knowingly and/or recklessly false.

96. Defendants' statement that Plaintiff is one of "Columbia's Leading Antisemites" was knowingly and/or recklessly false.

97. From October 25, 2023 to date, Defendants' [www.yusufhafez.com](http://www.yusufhafez.com) website states that "student signatories including Yusuf Hafez have not been disciplined by the university."

98. Plaintiff was not a "student signatory" of the letter.

99. Defendants' statement that Plaintiff Yusuf Hafez was a "student signatory" of the letter was knowingly and/or recklessly false.

100. On October 25, 2023 at approximately 10:00 am, Defendant AIM's mobile billboard truck appeared outside of Columbia University's main entrance in Morningside Heights in Manhattan, displaying the words "Columbia's Leading Antisemites" and featuring streaming

photographs of a number of students including Plaintiff.

101. In addition to Plaintiff's photograph under the words "Columbia's Leading Antisemites", the trucks displayed the website containing Plaintiff's name: [www.yusufhafez.com](http://www.yusufhafez.com).

102. Defendants' statement that Plaintiff is one of "Columbia's Leading Antisemites" was knowingly and/or recklessly false.

103. Plaintiff is not one of "Columbia's Leading Antisemites".

104. Defendants repeated this false and defamatory statement on mobile billboard trucks on October 25, 2023 through October 27, 2023 and on November 1, 2023.

105. Defendants have repeated this false and defamatory statement on their own website from October 25, 2023 through the present.

106. Defendants have repeated these false and defamatory statements on the website they created in Plaintiff's name from October 25, 2023 through the present.

107. Upon information and belief, Defendants knowingly, intentionally and/or recklessly labeled Plaintiff as an Antisemite based on the false assertion that he was a purported "leader" of "an organization" that signed a letter relating to the current conflict in Israel.

108. Defendants and their agents have defamed Plaintiff in that they have made and published false and defamatory statements about him, which have damaged and will continue to damage him in his trade, business, and profession.

109. Labeling a student as an antisemite will injure him in his trade, business or profession and therefore constitutes defamation per se.

110. Defendant AIM's claim that Plaintiff is an antisemite knowing it is false was and is defamatory and defamation per se.

111. Defendant Guillette's claim that Plaintiff is an antisemite knowing it is false was

and is defamatory and slander per se.

112. Defendant AIM made and published these false and defamatory statements concerning Plaintiff knowing that they were false or with reckless disregard for their truth or falsity.

113. Defendant Guillette's false statements directed at Plaintiff were made with malice and motivated by spite and ill will, and with wanton, reckless, or willful disregard for their injurious effects on Plaintiff.

114. Defendants and their agents have published false, misleading, and defamatory statements to third parties.

115. Defendants had no privilege or authorization to publish these false and defamatory statements.

116. In publishing false, misleading, and defamatory statements, Defendants acted with actual and common law malice.

117. Defendants knew or should have known that their defamatory statements were false and/or recklessly disregarded the truth, including by intentionally avoiding the truth.

118. Defendants' false, misleading, and defamatory statements were intended to, have, and will continue to injure Plaintiff in his trade, business or profession.

119. As a consequence of Defendants' publication of false, misleading, and defamatory statements, Plaintiff has sustained and will continue to sustain injuries and special damages, including fear for his physical safety, damage to his name, reputation, and career, damage to his ability to obtain future employment, and damage to his trade, business, and profession, as well as pain and suffering and emotional distress.

**THIRD CAUSE OF ACTION**  
**Intentional Infliction of Emotional Distress**

120. Plaintiff realleges and incorporates by reference each and every allegation contained above as if fully set forth herein.

121. As described in the foregoing paragraphs, on October 25, 2023, Defendants AIM, through its agents, including in particular Defendant Guillette, falsely accused Plaintiff, a private citizen, of signing a letter on the current conflict in Israel/Palestine conflict that he did not sign.

122. They did so by exposing him, a private citizen, in a public forum by calling him an "Antisemite" and by purchasing a Domain in his name.

123. A knowingly false accusation of antisemitism constitutes extreme and outrageous conduct.

124. Defendants knew or should have known that their conduct would cause serious damage to Plaintiff's name and reputation.

125. In fact, Defendants' conduct was calculated to damage Plaintiff's name and reputation and cause him to fear for his life.

126. Defendants, through the foregoing acts, did commit extreme and outrageous conduct and thereby intentionally and/or recklessly cause Plaintiff to suffer severe mental and emotional distress, pain and suffering, and damage to name, career and reputation.

127. Defendants committed the foregoing acts intentionally, willfully, and with malicious disregard for Plaintiff's rights and are therefore liable for punitive damages.

128. As a direct and proximate result of Defendants' actions, Plaintiff has sustained damages including damage to his name, reputation, and academic career, and damage to his ability to obtain future employment, as well as mental and physical pain and suffering and emotional distress.

**DEMAND FOR RELIEF**

WHEREFORE, Plaintiff respectfully requests the Court to award the following relief:

- a) An Order enjoining and restraining Defendants from continuing to use Plaintiff's image/photograph, name, and likeness;
- b) Judgment declaring that Defendants' acts complained of herein violate Plaintiff's rights;
- c) Compensatory damages to compensate Plaintiff for damage to name, career and reputation, pain and suffering, emotional distress and mental anguish, embarrassment, and indignity, in an amount to be determined at trial;
- d) Punitive damages in an amount to be determined at trial;
- e) Attorneys' fees, costs and interest;
- f) Such additional relief as may be just and proper.

Dated: November 9, 2023  
New York, New York

Respectfully submitted,

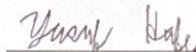
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(212) 490-0400

By:   
\_\_\_\_\_  
Jonathan C. Moore  
Luna Droubi  
Deema Azizi

VERIFICATION

STATE OF NEW YORK )  
: ss.:  
COUNTY OF NEW YORK )

YUSUF HAFEZ, being duly sworn, deposes and says: I am the Plaintiff in the within action; I have read the foregoing Verified Complaint and Petition and know the contents thereof; the same is true to my own knowledge, except as to the matters therein stated to be alleged on information and belief, and as to those matters I believe it to be true.

  
\_\_\_\_\_  
YUSUF HAFEZ

Sworn to before me this  
9 day of November, 2023

  
\_\_\_\_\_  
Notary Public

SIHANG NING  
NOTARY PUBLIC-STATE OF NEW YORK  
No. 01NI6405325  
Qualified in Kings County  
My Commission Expires 03-02-2024