

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

ABEER ABOUYABIS

Plaintiff,

v.

EMORY UNIVERSITY,

EMORY HEALTHCARE, INC.,

STOPANTISEMITISM.ORG,

LIORA REZ,

JASON D. WEIDEN,

JOSHUA H. WINER,

TUVIA MILSZTEIN, AKA ADAM MILSTEIN,

ADAM AND GILA MILSTEIN FAMILY FOUNDATION

JOHN DOES 1–10

Defendants.

Case No. 1:25-mi-99999

JURY TRIAL DEMAND

COMPLAINT FOR DAMAGES AND JURY DEMAND

Plaintiff Abeer AbouYabis (“Dr. AbouYabis”) files this Complaint against Defendants Emory University (“Emory” or “University”), Emory Healthcare, Inc. (“Emory Health”), StopAntiSemitism.org, Liora Rez, Jason D. Weiden, Joshua H. Winer, Tuvia Milsztein, aka Adam Milstein, Adam and Gila Milstein Family Foundation, and John Does 1–10, and alleges as follows:

I. INTRODUCTION

1. This case exposes a brazen campaign of institutionalized discrimination, retaliation, and censorship orchestrated by a major academic institution and its allies to punish a Palestinian Muslim physician for daring to advocate for her people. Dr. Abeer AbouYabis—a board-certified hematologist, esteemed educator, and lifelong champion of

equity—was terminated by Emory University in 2023 for privately condemning Israel’s genocide on Gaza, while non-Palestinian faculty who endorsed, celebrated, and advocated for the genocide faced no consequences.

2. Emory, colluding with the anti-Palestinian hate group StopAntisemitism, weaponized false accusations of “antisemitism” to silence Dr. AbouYabis’ protected speech. This termination occurred during federally protected medical leave for PTSD and depression exacerbated by Emory’s own retaliatory investigation and the traumatic loss of 37 family members in Israel’s genocidal campaign in Gaza in October 2023. Meanwhile, Emory shielded faculty like Dr. Joshua H. Winer—who not only publicly endorsed the Israeli military’s genocide in Gaza, but opted to participate in the Zionist genocide by volunteering in the Israeli Defense Forces (IDF)—and Dr. Jason Weiden, who celebrated the indiscriminate killing and annihilation of Gaza and its indigenous Palestinian inhabitants, led a social media smear campaign against Dr. AbouYabis.

3. This lawsuit challenges a systemic double standard: Emory enforces conduct policies with discriminatory fervor against Palestinians and Muslims while excusing identical or worse conduct by Zionist faculty. It reveals how well-funded networks like StopAntisemitism and its backers (including the Milstein Family Foundation) exploit antisemitism accusations as a political cudgel to erase Palestinian narratives, suppress dissent, and legitimize occupation, apartheid, and genocide.

4. Dr. AbouYabis’ termination is not an isolated incident. It reflects a national pattern of Israeli-aligned groups using defamation, doxing, and institutional capture to chill advocacy for Palestinian rights—a modern-day McCarthyism enabled by universities like Emory. The First Amendment, Title VII, and core civil rights statutes exist to prevent such

abuses. This Court must hold Emory accountable for surrendering academic freedom to political extortion and perpetuating anti-Palestinian racism.

II. JURISDICTION AND VENUE

5. This Court has federal question jurisdiction under 28 U.S.C. § 1331 because Plaintiff's claims arise under federal statutes, including: Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e et seq. (national origin and religious discrimination and retaliation); 42 U.S.C. § 1981 (racial discrimination); 42 U.S.C. § 1983 (First Amendment retaliation and Due Process violations); 42 U.S.C. § 1985(3) (conspiracy to violate civil rights); Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d (discrimination under federally funded programs); The Americans with Disabilities Act, 42 U.S.C. § 12112 et seq. (retaliation for disability accommodations); and The Family and Medical Leave Act, 29 U.S.C. § 2615 et seq. (interference with protected leave).

6. This Court has supplemental jurisdiction over Plaintiff's state law claims for defamation and breach of contract under 28 U.S.C. § 1367, as these claims form part of the same case or controversy as the federal claims.

7. Venue is proper in the Northern District of Georgia under 28 U.S.C. § 1391(b)(2) because a substantial part of the events giving rise to these claims occurred in this District, including Plaintiff's employment at Emory University, the discriminatory termination, and the Defendants' retaliatory conduct. Defendant Emory University resides in this District, and its principal place of business is located in Atlanta, Georgia.

8. This Court has personal jurisdiction over all Defendants. Emory University and Emory Healthcare, Inc. are Georgia entities conducting business in this District. Defendant StopAntisemitism.org and its Executive Director, Liora Rez, purposefully directed harmful

conduct into this District by doxxing Plaintiff and coordinating with Emory to secure her termination, causing foreseeable harm in Georgia. Individual Defendants Jason Weiden, MD, and Joshua Winer, MD, reside and work in this District.

9. The amount in controversy exceeds \$75,000, exclusive of interest and costs, satisfying diversity jurisdiction under 28 U.S.C. § 1332(a) as to non-federal claims involving diverse parties.

III. EXHAUSTION OF ADMINISTRATIVE REMEDIES

10. Dr. Abeer AbouYabis timely filed a Charge of Discrimination with the Equal Employment Opportunity Commission (EEOC) on **May 8, 2024** (Charge No. 410-2024-08267), alleging violations of Title VII (national origin, religious discrimination, and retaliation) and the Americans with Disabilities Act (retaliation for PTSD-related accommodations).

11. The EEOC issued a Right-to-Sue Letter on January 31, 2025, explicitly authorizing Dr. AbouYabis to pursue her claims in federal court. This action is filed within 90 days of receiving the Notice, as required under 42 U.S.C. § 2000e-5(f)(1).

IV. PARTIES

12. **Plaintiff Abeer AbouYabis** is a Palestinian American Muslim board-certified hematologist and oncologist, formerly employed as an Assistant Professor at Emory University School of Medicine and a physician at Emory Winship Cancer Institute. She served as Co-Vice Chair of Diversity, Equity, and Inclusion (DEI) for the Department of Hematology and Medical Oncology until her wrongful termination on November 8, 2023.

13. **Defendant Emory University** A private research university in Atlanta, Georgia, and Plaintiff's former employer. Emory receives federal funding and operates under policies governing faculty conduct, academic freedom, and anti-discrimination.

14. **Defendant Emory Healthcare, Inc.** is Emory University's affiliated healthcare system, which oversees clinical privileges and patient care at Emory facilities. Emory Healthcare jointly enforced the discriminatory termination and public defamation of Dr. AbouYabis.

15. **Defendant StopAntisemitism.org** is a non-profit foundation that orchestrated a doxing campaign against Dr. AbouYabis by disseminating doctored screenshots of her private social media posts, falsely labeling her critiques of Israeli policy as "antisemitic."

16. **Defendant Liora Rez** is the Executive Director of StopAntisemitism.org, who personally directed the targeted harassment of Dr. AbouYabis, amplifying the posts to over 2.3 million viewers and coordinating with Emory to secure her termination.

17. **Defendant Jason D. Weiden** is an Emory radiologist who publicly denounced Dr. AbouYabis as a " Hamas supporter " on social media but faced no disciplinary action, exemplifying Emory's selective enforcement of conduct policies against Palestinian employees.

18. **Defendant Joshua H. Winer** is an Emory surgical oncologist who endorsed, served, and supports the Israeli war crimes in Gaza—a campaign the International Court of Justice found genocidal—yet retained his position despite student complaints.

19. **Defendant Tuvia Milsztein, aka Adam Milstein** is a California-based real estate investor, influential Zionist lobbyist, and founder of the Adam and Gila Milstein Family Foundation (MFF). Defendant Milsztein directed MFF funds to organizations like

StopAntisemitism.org and Canary Mission, which systematically dox, harass, and cyberstalk conscientious advocates on Palestinian human rights. Defendant Milsztein publicly endorses strategic campaigns conflating anti-Zionism with “antisemitism.” MFF’s financial support enabled StopAntisemitism.org’s doxing of Dr. AbouYabis, directly contributing to her termination and reputational harm.

20. **Defendant Adam and Gila Milstein Family Foundation** (MFF) is a private foundation headquartered in Encino, California, that is the principal funder of anti-Palestinian advocacy networks in the United States. MFF funds StopAntisemitism.org’s 2023 “ Hamas Watchlist ” campaign, which targeted Dr. AbouYabis. MFF also supports Canary Mission’s blacklist database, used to pressure institutions like Emory to punish Palestinian-affiliated students, faculty, and staff. MFF finances campus initiatives (e.g., UCLA’s “Israel Fellowship”) promoting policies that strategically equate Palestinian solidarity with “antisemitism.”

21. **Defendant John Does 1-10** are unidentified individuals and entities, including administrators, funders, or collaborators within StopAntisemitism.org and Emory, who participated in or facilitated the conspiracy to suppress Palestinian advocacy.

22. **Other Unnamed Co-Conspirators** who contributed to the discriminatory campaign against Dr. AbouYabis but whose identities will be uncovered through discovery.

V. FACTUAL ALLEGATIONS

23. Dr. Abeer AbouYabis is a Palestinian Muslim American board-certified hematologist and oncologist with over 20 years of experience. She joined Emory University in 2018 as an Assistant Professor and served as Co-Vice Chair of Diversity, Equity, and Inclusion (DEI) for the Department of Hematology and Medical Oncology. She received

accolades including *Atlanta's Best Doctors in Hematology* (2023) and led initiatives to improve care for sickle cell patients and underrepresented communities.

24. On October 7, 2023, Dr. AbouYabis posted on her **private** social media accounts criticizing Israel's occupation of Gaza and comparing Israeli officials' dehumanizing rhetoric to historical atrocities (e.g., Nazi Germany, apartheid South Africa). Her posts condemned violence against civilians and urged solidarity with Palestinians.

25. On October 8, she attended a peaceful protest advocating for Palestinian rights and an end to U.S. funding of military actions in Gaza.

26. On October 16, 2023, StopAntisemitism.org (funded by the Milstein Family Foundation) screenshotted, doctored, and disseminated Dr. AbouYabis' posts, falsely labeling them "antisemitic." The posts went viral, garnering 2.3 million views and 3,600 reposts.

27. Liora Rez, StopAntisemitism's Executive Director, targeted Dr. AbouYabis in a coordinated campaign, tagging Emory University and demanding her termination.

28. On October 17, 2023, Emory placed Dr. AbouYabis on administrative leave without prior notice, publicly announcing her suspension via email and social media before informing her. This triggered death threats and harassment.

29. Emory initiated an investigation citing "professionalism" concerns, despite her posts complying with Emory's Social Media Policy (no affiliation with Emory disclosed, private account).

30. Non-Palestinian faculty engaged in comparable or worse conduct without discipline.

31. Dr. Joshua Winer (Emory surgical oncologist) publicly endorsed the IDF's 2023 Gaza war crimes, which the International Court of Justice found plausibly genocidal.

32. Dr. Rebecca Seidel (Emory radiologist) "liked" social media posts calling Palestinians "pro-jihad foreigners" and advocating for the dissolution of UNRWA.

33. Dr. Jason Weiden (Emory radiologist) led a public smear campaign against Dr. AbouYabis, labeling her a " Hamas supporter."

34. Emory took no action against these faculty members, violating its own Policy 4.62 (prohibiting "discourteous or disrespectful treatment").

35. On October 19, 2023, Dr. AbouYabis was diagnosed with PTSD due to trauma from losing 37 family members in Israeli airstrikes and harassment from Emory's investigation. Her psychiatrist mandated FMLA leave until November 15, 2023.

36. Emory ignored accommodations, continued its intrusive investigation, and terminated her on November 8, 2023, while she was on approved leave.

37. Emory's public termination announcement exposed Dr. AbouYabis to death threats and reputational harm. The university failed to address the threats or protect her safety.

38. Emory removed her profile from its website and revoked clinical privileges, despite no patient complaints in her 20-year career.

39. The U.S. Department of Education's 2025 Title VI resolution found Emory fostered systemic anti-Muslim/Palestinian hostility.

40. Emory falsely accused Dr. AbouYabis of "antisemitism" in public statements, damaging her professional reputation.

41. Emory violated its Faculty Handbook by terminating her without due process or a pre-termination hearing.

42. Emory, StopAntisemitism.org, and the Milstein Family Foundation colluded to suppress Palestinian advocacy by weaponizing antisemitism accusations. Emory acted on StopAntisemitism's demands within 48 hours, demonstrating a "meeting of the minds" to violate Dr. AbouYabis' constitutional rights.

43. Dr. AbouYabis lost her annual salary, suffered PTSD exacerbation, and cannot secure comparable employment due to defamatory statements.

44. Her termination chilled academic freedom and Palestinian advocacy at Emory, as documented by the Emory Senate Committee for Open Expression (CFOE).

VI. CAUSES OF ACTION

COUNT I

42 U.S.C. § 2000e et seq.

(Discrimination Based on Race, Religion, and National Origin)

Against Defendant Georgetown University

45. Dr. AbouYabis realleges and incorporates by reference the allegations contained in Paragraphs 1 through 44 above.

46. Dr. AbouYabis, a Palestinian Muslim, was subjected to disparate treatment by Emory, which selectively enforced conduct policies against her for private political speech while shielding non-Palestinian/non-Muslim faculty (e.g., Dr. Jason Weiden, Dr. Joshua Winer) who engaged in comparable or worse misconduct.

COUNT II

D.C. Code § 2-1402.11

(Discrimination Based on Race, Religion, and National Origin)

47. Dr. AbouYabis realleges and incorporates by reference the allegations contained in Paragraphs 1 through 44 above.

VII. PRAYER FOR RELIEF

WHEREFORE, Plaintiff Abeer AbouYabis respectfully requests that this Court enter judgment in her favor and against all Defendants, and:

- (a) Grant such other relief as this Court deems just and proper.

JURY DEMAND

Plaintiff demands a trial by jury on all triable claims.

Respectfully submitted,

/s/ Ravi Rayasam
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** Pro Hac Application for Abdel-Rahman Hamed is Pending*