COUNTY CLERK

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> The Lawfare Project 633 Third Avenue, 21st Floor New York, NY 10017 Tel. 212-339-6995

Supreme Court of the State of New York County of New York

Bibliotechnical Athenaeum,))
Plaintiff,)
- against -) Index No. 653668/2016
C)
National Lawyers Guild, Inc., & The National Lawyers Guild) Amended Complaint)
Foundation, Inc.)
Defendants.)
)

Plaintiff, complaining of the Defendants by its attorney, Benjamin Ryberg, Attorney at Law, respectfully sets forth and alleges as follows:

I. Introduction

- 1. This is an action for unlawful discrimination under the New York City and State Human Rights Laws. As set forth in more detail below, the Defendants, a place or provider of public accommodation, have unlawfully denied such public accommodation to the Plaintiff on the grounds of its Israeli citizenship and national origin.
- More specifically, the Defendants refused to permit Plaintiff to participate in its 2. Annual Banquet to be held in New York in August of 2016 by refusing to sell Plaintiff advertising space in its Dinner Journal to be distributed at such banquet. This refusal was based solely on Plaintiff's Israeli citizenship and national origin.

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3. It should be emphasized that this action does not challenge the Defendants' right to criticize Israel; to hold anti-Israel or anti-Semitic views; or to advocate for policies based on such views.

4. Instead, this action challenges the Defendants' unlawful public accommodation discrimination regardless of the political position which underlies such discrimination.

II. Parties

- 5. Plaintiff Bibliotechnical Athenaeum ("Plaintiff" or "Bibliotechnical") is an Israeli organization with places of business in New York, New York and Elazar, Gush Etzion, Israel.
- 6. Defendants National Lawyers Guild, Inc. and The National Lawyers Guild Foundation, Inc. (collectively, the "Guild") are New York not-for-profit corporations with principle places of business in the State of New York, County of New York.

III. Venue and Jurisdiction

- 7. Venue in the County of New York is appropriate in that the Guild is located in the County of New York.
- 8. Subject matter jurisdiction over this action exists in that the Supreme Court of the State of New York has general jurisdiction. Further, Plaintiff is seeking injunctive relief against the Defendants.
- 9. Personal jurisdiction exists in that this matter arises out of the Defendants' activities in the State of New York, specifically the providing of public accommodation and unlawfully denying such accommodation to the Plaintiff.

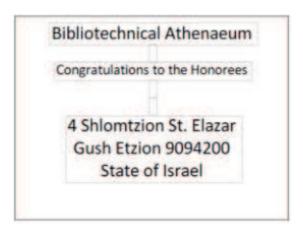
V. Background

10. The Guild regularly holds conferences and events, both inside and outside of New York. These events are open to the public and food, drink, and lodging are typically offered to participants.

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11. In August 2016, the Guild held a "Law for the People" convention in Manhattan (the "Convention").

- 12. In connection with the Convention, the Guild offered to the public the opportunity to purchase advertising in its "dinner journal" to be distributed at its annual banquet.
- 13. More specifically, the Guild posted the following message on its web site:
 - Show your support for the NLG with an ad in our annual Dinner Journal! Distributed at the Banquet of the #Law4thePeople Convention, placing an ad in the journal is a great way to congratulate our outstanding honorees, publicize your firm or organization, or just share a message of your own!
- 14. In response to this message, on or about June 26, 2016, Bibliotechnical submitted the following advertisement to be included in the dinner journal:



- 15. This advertisement is typical of advertisements which are accepted and included in the dinner journal by the Guild.
- 16. On June 27, 2016, Bibliotechnical duly paid the \$200 fee for publication of this advertisement.
- 17. On the same day, the Guild rejected the advertisement, advising Bibliotechnical that it would not accept monies from an Israeli organization. The next day, the \$200 was refunded.
- 18. Subsequently, the Guild published its annual dinner journal, a copy of which is attached hereto and incorporated herein by reference.

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19. The dinner journal contained no advertisement from the Plaintiff even though it contained many, similar ads from non-Israeli organizations.

VI. Causes of Action and Demand for Relief

First Cause of Action: Violation of

New York City Human Rights Law § 8-107(4)(1)

- 20. The preceding paragraphs are incorporated as if restated herein.
- 21. Bibliotechnical is a "person" within the meaning of the New York City Human Rights Law in that it is an organization and the New York City Human Rights Law defines a "person" as including "one or more, natural persons, proprietorships partnerships, associations, group associations, organizations, governmental bodies or agencies, corporations, legal representatives, trustees, trustees in bankruptcy, or receivers." New York City Human Rights Law § 8-102.
- 22. Further, Bibliotechnical is of Israeli citizenship and national origin. This is clear without even looking beyond the Hebrew in its founding documents, but the courts have held that corporations can even have a racial identity for purposes of anti-discrimination claims. *See, e.g., Hudson Valley Theater Inc. v. Heimbach*, 671 F.2d 702 (2d. Cir. 1982).
- 23. The Guild is and/or regularly operates a place or provider of public accommodation in that it provides "goods, services, facilities, accommodations, advantages or privileges of any kind" within the meaning of New York City Human Rights Law Section 8-102(9). More specifically, the Guild holds an annual banquet and offers advertising to the public in connection with such banquet.
- 24. The Guild violated the New York City Human Rights Law by denying Bibliotechnical, because of its citizenship and national origin, the full and equal enjoyment, on equal terms and conditions, of the accommodations, advantages, services,

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> facilities or privileges of the place or provider of public accommodation. New York City Human Rights Law § 8-107(4)(1)(a).

Second Cause of Action: Violation of

New York City Human Rights Law § 8-107(4)(2)

- 25. The preceding paragraphs are incorporated as if restated herein.
- 26. The Guild violated the New York City Human Rights Law by making a declaration to Bibliotechnical that full and equal enjoyment, on equal terms and conditions, of the accommodations, advantages, facilities and privileges of the place or provider of public accommodation would be denied to Bibliotechnical because of its citizenship and national origin. New York City Human Rights Law § 8-107(4)(2)(a).

Third Cause of Action: Violation of New York City Human Rights Law § 8-107(18)

- 27. The preceding paragraphs are incorporated as if restated herein.
- 28. The Guild violated the New York City Human Rights Law by discriminating against, boycotting, or refusing to sell to Bibliotechnical because of its citizenship and national origin. New York City Human Rights Law § 8-107(18).

Fourth Cause of Action: Violation of

New York State Human Rights Law § 296

- 29. The preceding paragraphs are incorporated as if restated herein.
- 30. Bibliotechnical is a "person" within the meaning of the New York State Human Rights Law in that the New York State Human Rights Law defines a "person" as including "one or more individuals, partnerships, associations, corporations, legal representatives, trustees, trustees in bankruptcy, or receivers." New York Executive Law § 292(1).
- 31. Further, Bibliotechnical is of Israeli national origin. This is clear without even looking beyond the Hebrew in its founding documents, but the Courts have held that

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corporations can have even a racial identity for purposes of anti-discrimination claims. *See, e.g., Hudson Valley Theater Inc. v. Heimbach*, 671 F.2d 702 (2d. Cir. 1982).

- 32. Further, the Guild regularly operates places of public accommodation, resort, or amusement in that it puts on conferences which take place in the public areas of structures and in which food and lodging is offered. Indeed, this action arises from a banquet to be held in New York in August of 2016.
- 33. The Guild violated the New York State Human Rights Law by denying Bibliotechnical, because of its national origin, the accommodations, advantages, facilities or privileges of the Guild's event. New York Executive Law § 296(2).

Fifth Cause of Action: Violation of

New York State Human Rights Law § 296(13)

- 34. The preceding paragraphs are incorporated as if restated herein.
- 35. The Guild violated the New York State Human Rights Law by boycotting, blacklisting, or refusing to sell to Bibliotechnical because of its national origin. New York Executive Law § 296(13).

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WHEREFORE, Plaintiff demands judgment against the Defendants for (1) an appropriate amount of compensatory and punitive damages not to exceed \$100,000; (2) an injunction ordering the Defendants to cease engaging in discriminatory conduct; (3) costs, interest, and reasonable attorney's fees; and (4) such other and further relief as the Court deems just.

Respectfully submitted,

The Lawfare Project

Benjamin Ryberg

633 Third Avenue, 21st Floor New York, NY 10017 Tel. 212-339-6995

Dated: September 24, 2017

Brooklyn, NY

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NLG #Law4thePeople Convention

August 2016
New York City
NYU School of Law



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Cover: Guild contingent at disarmament rally, New York City, 1982. From left: Teddi Smokler, Stanley Faulkner, Ned Smokler, Peter Weiss, Deborah Rand, Harry Rand, Victor Rabinowitz, Gordon Johnson, unidentified. Photo curated as part of the NLG's 50th anniversary photo spread by Tim Plenk, Joan Lifton, and Jonathan Moore in 1987.

Layout and Design by Tasha Moro

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Welcome to New York!

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Dear fellow Guild members, supporters, and allies:

On behalf of the New York City Chapter, welcome to the NLG's Annual Banquet. Each year convention participants pause for an evening of celebration, to savor reflection with like-minded legal activists and recommit to the work of justice.

We hope you have enjoyed convening on campus, which was once the traditional format for NLG conventions, and that you have found the facilities amenable to productive work. Please join us in heartfelt thanks to New York University School of Law's Public Interest Law Center (PILC) for co-hosting the Convention, including Dean Trevor Morrison, Assistant Dean for Public Service Lisa Hoyes, Prof. Helen Hershkoff, NYU Law's Events Coordinator Josie Haas, Alesha Gooden, Nikita Chardhry, Ashley Martin, and Jerry Roman of NYU's Office of Housing Services. A special salute goes to Lisa Borge, Programs Manager of the NYU Law Public Interest Law Center.

The New York City Chapter has been fortunate to have generations of members who have worked in support of movements for social justice. They have founded projects that have gone on to become national programs or nonprofit organizations, and started law collectives, movement offices, and public interest law firms. They've been voices for the recognition of legal workers and mentors to generations of students. Some have been impactful judges. But our work has always benefited from our connection to our national organization, making us stronger and more effective.

Which brings us to our gathering this evening. The Annual Banquet, in addition to being a pause to celebrate and socialize, is above all the national organization's annual fundraising event. The NLG has not followed the trend of having high-ticket galas or events exclusively for major donors, so our annual gathering remains inclusive and affordable. That means the success of the national organization's sole fundraiser depends on us all stepping up to do our part. This year, we meet days after two national political conventions where the NLG was instrumental in defending the right of people's movements NOT to remain silent. Last month, the NLG was everywhere that people raised their voices against racist police killings. The importance of a national organization like ours is vital in these times.

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Guild members demonstrating at the New York Federal Building in NYCagainst U.S. aid to the Nicaragua Contras, 1984. (Photo curated as part of the NLG's 50th anniversary photo spread by Tim Plenk, Joan Lifton, and Jonathan Moore in 1987.)

Last year our wonderful member, Allan Botshon, made a transformative bequest to the NYC Chapter (stewarded by his friend and Chapter Director, Susan Howard). Our chapter shared a substantial part of Mr. Botshon's gift with the national organization which helped resolve

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immediate financial challenges. The national organization now needs to build capacity to grow and meet the challenges of these perilous high-stakes times. If everyone tonight makes a pledge to the NLG Foundation, it will show immediate returns, helping the national organization progress and build capacity. Please consider making a pledge at tonight's banquet!

The New York City Chapter has been honored to host this year's Law for the People Convention, and we look forward to passing the baton to our sister chapter in Washington, D.C., host for the NLG's 80th Anniversary Convention next year. Thanks to the convention planning committee and volunteers for working to make this Convention a success. Two individual thanks are in order: Chapter Executive Director Susan Howard masterfully coordinated the many components of making the NLG's first on-campus national meeting in decades work, and former chapter president and National Office collective member Franklin Siegel secured the event venue and lodging facilities, as he did for the NLG's last summer convention 23 years ago. We thank the National Office staff—King Downing, Lisa Drapkin, Pooja Gehi, Daniel McGee, Tasha Moro, and Traci Yoder—for a truly enjoyable collaboration. We also thank NLG president Natasha Bannan for asking the NYC chapter to consider hosting the Convention.

Finally, please join in a rousing cheer for a comrade and NLG leader who inspired us all: **MICHAEL RATNER PRESENTE!**

In solidarity,

Carl Lipscombe, President and Susan Howard, Executive Director on behalf of the NYC-NLG Chapter

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Program

Friday, August 5, 2016

7 PM-10 PM

7:30 PM	Welcome by Pooja Gehi & Natasha Lycia Ora Bannan
7:45 PM	Presentation of C.B. King Award to Emily Bock
7:55 PM	Presentation of Legal Worker Award to Noelle Hanrahan
8:05 PM	Remarks by Barbara Dudley and Carl Lipscome
8:15 PM	Presentation of Ernie Goodman Award to Michael Deutsch
8:25 PM	Presentation of Law for the People Award to Soffiyah Elijah
8:40 PM	Invite Attendees to Microphone
9:30 PM	Program Concludes

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Law for the People Award Soffiyah Elijah

d offiyah Elijah is the Executive Director of the Correctional Association of New York and member of the NLG-NYC Chapter.

An accomplished advocate, attorney, scholar and educator, Ms. Elijah is the first woman and the first person of color to lead the nearly 170-year old organization in its mission to create a fairer, more effective, and humane criminal justice system. Prior to joining the staff of the Correctional Association in March 2011, Ms. Elijah served as Deputy Director and a clinical instructor at the Criminal Justice Institute at



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Harvard Law School. At the Institute, she trained hundreds of law students to become effective and ethical lawyers and to engage in local and national reform of criminal and juvenile justice policies.

A native New Yorker, Ms. Elijah practiced criminal and family law in New York City for more than 20 years. Before moving to Harvard, she was a member of the faculty and Director and supervising attorney of the Defender Clinic at the City University of New York School of Law. She was a supervising attorney at the Neighborhood Defender Service of Harlem, where she defended indigent members of the Harlem community, and has also worked as a staff attorney for the Juvenile Rights Division of the Legal Aid Society.

Honored by the Massachusetts Chapter of the NLG in 2010 and the NLG-NYC Chapter in 2015, Ms. Elijah has dedicated her life to human rights and social activism. She is a recognized national and international authority on human rights issues and has served as a justice on several people's tribunals focused on the U.S. government's response to Hurricane Katrina, the testing of bombs in Viegues, Puerto Rico, and conditions of confinement inside American prisons. She has authored several articles and publications on U.S. criminal and juvenile justice policy and prison conditions and is a frequent presenter at national and international forums.

Ms. Elijah earned her Bachelor of Arts from Cornell University and Juris Doctorate from Wayne State University Law School.

Each year the National Lawyers Guild gives the Law for the People Award to an individual whose work embodies the values that our membership holds dear. Previous recipients include Walter Riley, Standish Willis, Jan Susler, Judith Berkan, and Jim Lafferty.

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Ernie Goodman Award Michael Deutsch

with the People's Law Office and a Guild member since 1970. From 1991-1996, he was the Legal Director of the Center for Constitutional Rights. Mr. Deutsch's legal career has been devoted to the representation of political activists and political prisoners. He was one of the criminal defense lawyers for the rebelling Attica prisoners, a coordinator of the Attica Brothers Legal Defense, and one of the class counsel in the Attica civil suit which, after two decades of litigation, resulted in a 12 million dollar settlement.



He was attorney for the five Puerto Rican Nationalist prisoners imprisoned in the 1950s who won an unconditional sentence commutation from President Carter in 1979, and represented Puerto Rican independentistas in Chicago, New York, and Hartford who were charged with seditious conspiracy, the Wells Fargo expropriation, and subpoenaed before federal grand juries. He also helped to develop the "Prisoner of War" claim under international law for Puerto Rican prisoners.

He has defended Black Panthers, Black prisoners facing the death penalty, and was part of the legal team that challenged the first use of the high security "control units" for men at Marion Federal Prison and for women at Lexington Federal Prison.

More recently, Michael successfully defended Chicago Palestinian community activist Muhammad Salah charged with Terrorism and RICO as well as Palestinian community organizers targeted by the FBI and subpoenaed to a federal grand jury.

Presently, Mr. Deutsch represents Rasmea Odeh, the deputy director of the Arab-American Action Network (AANN), a former Palestinian political prisoner and torture survivor, who has been charged with providing false information on her naturalization application, nine years after she received her citizenship. After her conviction in federal court in Detroit, her case was remanded by the Sixth Circuit to reconsider the exclusion of her PTSD expert.

Mr. Deutsch has written and lectured extensively on prisons, international human rights, and political repression.

Ernest "Ernie" Goodman (1906-1997) of Detroit was a founding member of the National Lawyers Guild and an influential civil rights and First Amendment lawyer. Each year the Ernie Goodman Award is awarded to a Guild lawyer who, within the past several years or currently, is engaged in legal struggle against financial, political, or social odds to obtain justice on behalf of those who are poor, powerless, or persecuted. The Goodman Award is given by the National Lawyers Guild Foundation.

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C.B. King Award **Emily Bock**

mily Bock is a 3L Rubin-**◄** Presser Social Justice Fellow and Beasley Scholar at the Temple University James E. Beasley School of Law in Philadelphia, PA. She has also been awarded the Honorable Dolores Sloviter Public Interest Fellowship, the Henry Maxmin Scholarship, and a SPIN Public Interest Honors Grant. She graduated with her B.A. in English Literature and a concentration in Gender and Sexuality Studies from Haverford College in 2011.

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Prior to law school, Ms. Bock was

a Haverford House Fellow and worked at Community Legal Services of Philadelphia and at the National Clearinghouse for the Defense of Battered Women. She also volunteered with the Pardon Me Clinic of X-Offenders for Community Empowerment (XCE), the Criminal Records Expungement Project of the Philadelphia Lawyers for Social Equity (PLSE), and the Restorative Justice Project at SCI-Graterford.

As a law student, she has worked with Community Legal Services of Philadelphia, Women Against Abuse, the New Jersey Office of the Public Defender, the Temple Legal Aid Office, the Sheller Center for Social Justice, and the Defender Association of Philadelphia. She was the 2014-2015 co-chair of the Temple Law National Lawyers Guild Chapter, and is a co-founder of the Temple National Lawyers Guild Expungement Project. After law school, Ms. Bock will clerk for one year in the Superior Court of New Jersey – Criminal Division. She hopes to pursue a career as a public defender or to work more broadly with people who are formerly incarcerated/those with past criminal legal involvement.

C. B. King (Chevene Bowers King, 1923-1988) was one of the country's most prominent and courageous civil rights lawyers. For over 30 years, he practiced law in Albany, Georgia, where he was a major figure in the civil rights movement. He was well-known for his courage, courtroom eloquence, and legal skills in the face of tremendous adversity and sometimes even violent opposition during the civil rights movement in Georgia. C.B. King was also a great teacher. In his office, on the streets, and in the courtroom, he taught several generations of law students and young lawyers how to practice law with a commitment to the poor, the disenfranchised, and the oppressed. A great many students underwent life-changing experiences under his tutelage.

Legal Worker Award

Noelle Hanrahan

oelle Hanrahan, is a private investigator, investigative iournalist and Director of Prison Radio, as well as a member of the Guild's San Francisco Bay Area Chapter, and in years past, the Philadelphia Chapter. Since 1992, she has produced over 3,000 of Mumia Abu-Jamal's radio essays and brought his first book out of prison, Live From Death Row (Harper Perennial). She edited *All Things* Censored (Seven Stories Press, 2002), and with Stephen Vittoria, she produced the acclaimed theatrically distributed feature documentary



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Mumia: Long Distance Revolutionary (Street Legal Film 2013). Noelle is a graduate of Stanford University with a B.A. in Gender, Race, and Class Studies, as well as Boston University with a M.A. in Criminal Justice. She is board President of the Redwood Justice Fund and a board member and past board president of the Quixote Center. Global Audio Forensic Investigations is her investigation firm. She is currently working on Abu-Jamal v. Kerestes, which is on the front line of bringing lifesaving medical care to Pennsylvania inmates, and Hanrahan v. Mohr which is advocating for the First Amendment rights of the Lucasville 7+ on Ohio's death row.

Prison Radio challenges unjust, racist and sexist police and prosecutorial practices that result in mass incarceration and the literal disenfranchisement of huge segments of our population. Since 1990, *Prison Radio* has been at the forefront of the movement challenging mass incarceration. The prisoners we work with have complete editorial freedom. Prison Radio seeks to amplify their uncensored voices. Prison *Radio* contributes these voices to documentaries, features, and movies and makes them available on our website and via subscriber newsletters. We broadcast on over 1,200 radio stations and reach millions of listeners and viewers. *Prison Radio* is celebrating its 25th Anniversary in 2016 and is a project of the Redwood Justice Fund, founded by Judi Bari and Tanya Brannan, Esq.

The annual NLG Legal Worker Award is given to a Guild member whose legal support work has demonstrated leadership in the organization, marked by one or more notable accomplishments, and recognized by their peers.

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Debra Evenson Venceremos International Award **Audrey Bomse**

udrey Bomse has been a lawyer since 1980 and an activist basically all her life. She practiced criminal law in the U.S. for many years as a Public Defender and later civil rights law, representing the interests of the class of state and county inmates at the New Jersey Office of Inmate Advocacy.

In 2001, Audrey moved to Palestine to work as a Human Rights lawyer for seven years, largely focusing on the issue of Palestinian political prisoners. Her last position was legal director of the United Against Torture Coalition,



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comprised of twelve NGOs working to prevent and combat torture. In that capacity she presented the coalition's "Alternative Report on Israel" to the UN Committee Against Torture in Geneva.

Audrey was a passenger on the second voyage of the Free Gaza Movement (FGM) in November 2008 and was subsequently detained for 4 days upon her return to Israel and was eventually deported. She then moved to London where she worked on legal issues involving the Israeli naval assault on the subsequent Freedom Flotillas to Gaza and associated issues. She moved to Miami in 2011.

Audrey was a member of the NLG delegation to Tunisia almost immediately after the revolution and, because her daughter and family live in Tunis, she has been there many times since. A particular interest of hers has been the transitional justice process - or lack thereof. Audrey was also a member of the NLG delegation to Egypt and has been actively working to support the Egyptian human rights movements.

Audrey has been an active member of the National Lawyers Guild for 30 years, past co-chair of its Prisoners' Rights Committee and current (longstanding) co-chair of its Palestine Subcommittee.

Former Guild President Debra Evenson (1942-2011) was one of the visionary architects of Cuba's legal system, and a staunch defender of the country at home. The award is presented by the International Committee in recognition of brave work to extend justice beyond borders.

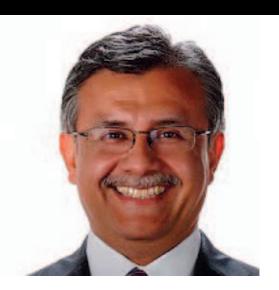
The 2016 Debra Evenson Venceremos International Award was presented at the joint International Committee and Labor and Employment Committee Reception. FILED: NEW YORK COUNTY CLERK 09/24/2017 03:34 PM

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Carol Weiss King Award Javier Maldonado

Javier N. Maldonado is a lawyer in private practice best known for his groundbreaking work at the intersection of immigration and criminal law. He is responsible for establishing a wide range of precedent in the Fifth Circuit limiting the reach of the aggravated felony provision of the INA including *Kern v. Holder* (Florida false imprisonment is not an aggravated felony), *Paez Sarmientos v. Holder* (Florida sale of a controlled substance is not a drug trafficking offense), *Davila v. Holder* (New York sale of a controlled substance is not



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an aggravated felony), and *Serna Guerra v. Mukasey* (Texas unauthorized driving of a vehicle is not an aggravated felony).

He regularly presents at state and national conferences on civil rights and immigration law and advises attorneys litigating cases in those areas. Maldonado is the previous Executive Director of the Texas Lawyers' Committee where he conducted impact litigation in the area of immigrants' rights. At the Lawyers Committee, Maldonado secured victories in *Martinez* Aguero v. Gonzalez, in which the Fifth Circuit affirmed that noncitizens stopped at the border are protected by the Fourth Amendment, and Ramirez Molina v. Ziglar, in which the Fifth Circuit held for the first time that noncitizens previously deported have the constitutional right to challenge their prior removal order. Prior to the Lawyers Committee, Maldonado served as a trial attorney at the Equal Employment Opportunity Commission where he litigated employment discrimination cases. Maldonado also served for three years as a staff attorney with the Mexican American Legal Defense and Educational Fund (MALDEF). He was born in Matamoros, Mexico and immigrated to the United States in 1974. Maldonado earned his B.A. and J.D. at Columbia University. Following law school, he clerked for U.S. District Court Judge George P. Kazen in Laredo, Texas. Today, Maldonado lives and works in San Antonio, Texas.

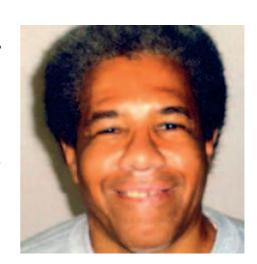
The National Immigration Project of the National Lawyers Guild awards the Carol Weiss King Award annually for excellence in the pursuit of social justice through organizing, litigating, and teaching. The award has honored dozens of individuals whose work has significantly advanced human and civil rights for all. Prominent U.S. lawyer Carol Weiss King (1895-1952) specialized in immigration law and the defense of the civil rights of immigrants, and was a founding member of the National Lawyers Guild.

The 2016 Carol Weiss King Award was presented at the Keynote Address.

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Arthur Kinoy Award Albert Woodfox

Ibert Woodfox grew up in New Orleans, Louisiana, one of six children raised by a single mother. By the time he was a young adult, he had succumbed to the lure of the streets and found himself behind bars in a state that now has the distinction of being the forerunner when it comes to mass incarceration. His encounters with the law landed him in the notoriously dangerous Louisiana State Penitentiary (known as "Angola").



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By 1977, two courts had concluded that state and federal constitutional violations

were rampant in the facility, one noting that conditions at Angola "shock the conscience of any right thinking person." In the 1960s and 1970s, Angola was segregated. By the early 1970s, Angola did not even have African American employees. In this volatile climate, Albert Woodfox and the late Herman Wallace courageously founded a prison chapter of the Black Panther Party. Robert King later joined them in their campaign for fair treatment and better conditions for inmates, racial solidarity between black and white inmates, and an end to the rape and sexual slavery that was then endemic in the prison. In an effort to quell their organizing, they were framed for murders and placed in solitary confinement, known as "Closed Innocence" and mounted their own defense for over twenty years until a local support group was formed and legal representation followed. Thereafter, their support expanded to a national and then an international coalition. What was initially a case soon became a campaign and then a movement.

The movement seeks to disrupt unjust and inhumane practices wherever they exist. After emerging from 43 horrific years in solitary confinement, Albert joined the effort that he inspired. When asked to explain how it is that he defied so many odds, Albert says: "If a cause is noble, you can carry the weight of the world on your shoulders." Albert spends his days making presentations, advocating for policy changes and legal reforms, and enjoying the company of his daughter, grandchildren, great-grandchildren, the Angola 3 support team, and his immense conglomerate of family, friends, and associates.

Albert is a victim of racism, abuses of power, prosecutorial misconduct, instances of judicial indifference, and official corruption, but he chooses his legacy to be that of an overcomer.

The Arthur Kinov Award was established in 2008 as an occasional award given in the spirit of beloved member Arthur Kinoy. The inaugural recipient was former Jailhouse Lawyer VP Paul Wright. While there are no formal guidelines for the award, on special occasions it may be given to those individuals whose work and passion would have especially appealed to Arthur.

The 2016 Arthur Kinoy Award was presented at the Keynote Address.

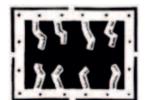
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Honoring Albert Woodfox Frederick Douglass was right:

"Find out just what any people will quietly submit to and you have found out the exact measure of injustice and wrong which will be imposed upon them."



You never stopped fighting; we are all stronger thanks to you.

—Deborah & Henry Willis

So proud of all the honorees!

You Always Stand for Justice No Matter What!

Bill Quigley New Orleans

VAN DER HOUT, BRIGAGLIANO & NIGHTINGALE, LLP

SPECIALIZING IN ALL ASPECTS OF IMMIGRATION
AND NATIONALITY LAW

Congratulations Michael, Javier, Audrey, and all the other honorees for your

dedicated work promoting and defending the civil rights of all!

MARC VAN DER HOUT | ZACHARY NIGHTINGALE | STACEY GARTLAND

CHRISTINE BRIGAGLIANO, OF COUNSEL | KATHERINE M. LEWIS | VALERIE ANNE ZURIN | JENNIE C. LIU

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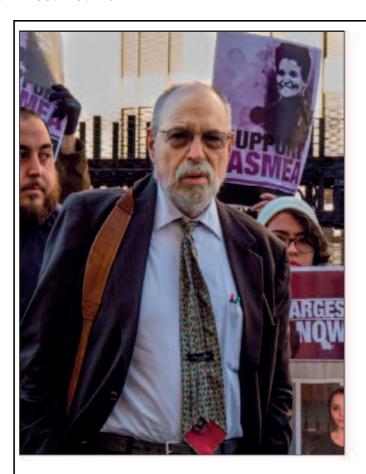
99 Hudson Street, 12 FL, New York, NY 10013

T: 212.966.5932 www.aaldef.org FB: bit.ly/aaldef Twitter: @aaldef

Congratulations to Michael
Deutsch on his hard earned
and well deserved award in
recognition of his tireless
efforts as a true lawyer for the
people.

Peter Schmiedel and Susan Mitchell

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NYSCEF DOC. NO. 25

Congratulations to the Remarkable

Michael Deutsch

Our comrade, friend, mentor, and most worthy recipient of this year's Ernie Goodman Award!

Fighting for the Attica brothers, the self-determination of the Puerto Rican and Palestinian Peoples and their political prisoners, the targets of Grand Jury abuse, and many other freedom fighters and targets of racist and political repression for 46 years. You are, and always have been, a wise leader, a lawyers' lawyer, an activist's activist, and a brilliant political and legal strategist.

Congratulations to Soffiyah Elijah and all 2016 NLG Award winners

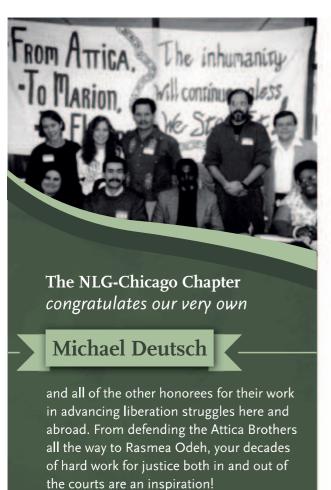
Freedom for Rasmea! Free Oscar López Rivera! **Black Lives Matter!** Reparations Won!

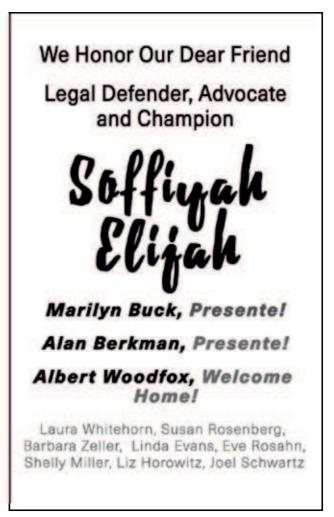
La Lucha Continua! The People's Law Office Family

Alexis, Ben, Brad, Flint, Kris, Jan, Jani, John, Joey, Lourdes, Sarah, Shubra, Dennis, Jeff & Pat



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I AM BOTH
HONORED &
HUMBLED TO BE
AMONG SUCH
DISTINGUISHED
RADICAL LEGAL
AND POLITICAL
ACTIVISTS!

- AUDREY





Congratulations, Audrey, for this well-deserved award. We are proud to know and work with you.

The Free Gaza Movement Board

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CONGRATULATIONS TO ALL THE HONOREES, Especially for my Good Friend Michael Deutsch.

叫

JIM FENNERTY

Javier

When you smile, the whole world smiles with you!

Congratulations on this muchdeserved recognition!

Trina and Mary



Congratulations to our friend and esteemed colleague Javier Maldonado on receiving the Carol Weiss King Award!



Your relentless pursuit of social justice through litigation and education has made a significant impact in our field and has inspired many.

Congratulations to all the NLG honorees!

- De Mott, McChesney, Curtright & Armendáriz, LLP



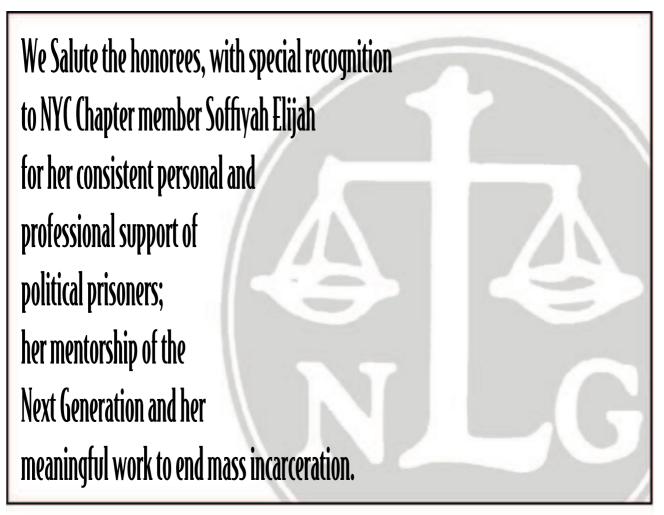
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THE PHILADELPHIA CHAPTER

OF THE NLG

CONGRATULATES

EMILY BOCK

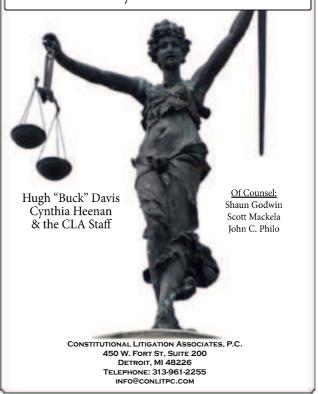
ONE OF PHILLY'S BEST AND BRIGHTEST

> ON THE C.B. KING AWARD



Congrats to all the honorees and best regards to all our NLG friends. We are missing seeing you all in NYC for this convention but looking forward to next year.

- Cynthia & Buck



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SEGAL & GREENBERG LLP

Salutes

Audrey Bomse, Soffiyah Elijah, Albert Woodfox, Javier Maldonado, Emily Bock, Michael Deutsch, and Noelle Hanrahan

> For Their Advocacy and Vision

Philip C. Segal Margery A. Greenberg

William R. Dalsimer Louise Gruner Gans Cindy S. Singh Stephen M. Latimer

179 Franklin Street New York, New York 10013 (212) 297-0503 www.segal-greenberg.com

Congratulations to all of tonight's outstanding Honorees



 ∞

WORKERS' COMPENSATION • SOCIAL SECURITY DISABILITY **EMPLOYMENT DISCRIMINATION • CIVIL RIGHTS**

 ∞

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Congratulations to all the NLG awardees. You are awesome.

Walter Riley, Law Office 1440 Broadway, Suite 612A Oakland, ČA 94612 (510) 451-1422 walterriley@rrrandw.com

CONGRATULATIONS TO THE 2016 NATIONAL LAWYERS **GUILD HONOREES**

-Joseph Lipofsky

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Felicitaciones Javier

Es un orgullo para nosotros conocerte y trabajar contigo.

Your patience, guidance and wisdom are unparalleled. Your remarkable work has advanced the rights of all immigrants. We admire that you never back down from a tough case and that you're always willing to push the envelope.

From Deep in the Heart of Texas

Carlos Garcia Garcia and Garcia, McAllen, Texas

Denise Gilman, Austin, Texas

Barbara Hines, Austin, Texas

Ranjana Natarajan, Austin, Texas

Erica Schommer, San Antonio, Texas

Stephanie Taylor, Hansen and Taylor, Austin, Texas

Lee Teran, San Antonio, Texas

Frances Valdez, FValdezLaw, Houston, Texas

Jennifer Walker Gates, Chito Vela and Susannah Volpe Walker Gates Vela, Austin, Texas

> Kate Lincoln-Goldfinch Lincoln Goldfinch Law, Austin, Texas

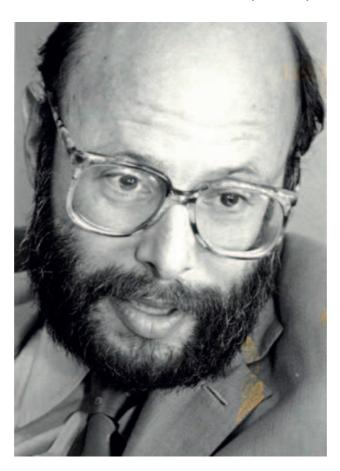
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HONORING MICHAEL RATNER

Michael Ratner was truly a revolutionary lawyer. He embodied the spirit of the National Lawyers Guild's founders who believed that the law could and must be used to protect those dissidents and revolutionaries who were most despised and persecuted by reactionary and anti-democratic governments around the world, especially our own.



Michael speaking at 1987 press conference about Ben Linder, who was tortured and murdered by the US-backed Contras while he was helping to build a hydroelectric plant in Nicaragua. Michael and CCR represented Ben's family, seeking redress against Contra leaders and the US government.

Because of Michael's leadership of the Guild and the Center for Constitutional Rights, US imperialism was exposed and undermined, and an anti-imperialist movement gained strength and legitimacy.

Michael's leadership, legal acumen and personal courage provided inspiration for generations of Guild lawyers and law students. He leavened his brilliant mind and creative legal skills with love and humor, and an abundant energy. His work, his laugh, his irony and his enduring belief in the revolutionary spirit of the oppressed will live on.

NYSCEF DOC. NO. 25 RECEIVED NYSCEF: 09/24/2017

The Presidents of the Guild are gratified to know that Michael's spirit and inspiration are embodied in this year's honorees.

MICHAEL RATNER, PRESENTE!

Michael Avery
Natasha Lycia Ora Bannan
John Brittain
Marjorie Cohn
Barbara Dudley
Peter Erlinder
David Gespass
Bill Goodman
Paul Harris
Karen Jo Koonan
Jim Larson
Bruce Nestor
Azadeh Shahshahani
Marc Van Der Hout

Doron Weinberg

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AAAN salutes NLG and the venerable Michael Deutsch for their incredible work defending the rights of Palestinians in Chicago!

If we see only the worst, it destroys our capacity to do something. If we remember those times and places—and there are so many—where people have behaved magnificently, this gives us the energy to act, and at least the possibility of sending this spinning top of a world in a different direction. And if we do act, in however small a way, we don't have to wait for some grand utopian future. The future is an infinite succession of presents, and to live now as we think human beings should live, in defiance of all that is bad around us, is itself a marvelous victory.

- Howard Zinn

To Michael Deutsch

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Justice is a constant struggle thanks for your constancy Congratulations on a well deserved award.

Susan Kaplan & Len Cavise

Conrad Johnson, Brenda Eberhart,
Brian Donnelly and Mary Zulack unite
in praising
Our hero, the one and only
Javier Maldonado
During student days at Columbia Law
School we saw your determination to
right all wrongs. We knew you would
change the world in important and
positive ways— To you, and equally to
your wife and children, we say:
CONGRATULATIONS

WILLIAM ROTHBERG

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BILL & ELLEN

;PRESENTE!

In the 1970's the Guild was getting its Military Law Project in Southeast Asia (now called the Military Law Task Force) started while the war in Vietnam was winding down. A couple, Bill Schaap and Ellen Ray, volunteered to go to Okinawa to start and steer the Project's operation there. They organized and administered superbly. Their legacy lives. Okinawa was probably our most active outpost. Like other founders of the Military Law Task Force, they stayed close to the peace, justice, and opposition to empire that inspired the founding. In the past year, Ellen died, then Bill did. We owe them much.

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Dare to Struggle

Dare to Win!

Lynne Stewart Ralph Poynter CONGRATULATIONS JAVIER, ON A WELL DESERVED AWARD!

Hines & Leigh

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We Salute **AUDREY BOMSE**

and her fellow honorees

Audrey is a global people's lawyer whose dedication, innovation and commitment inspires us all to struggle for a world of justice and liberation.

Suzanne Adely Marjorie Cohn Jeff Frank John Fussell Katie Gallagher Steven Goldberg Zaha Hassan **Arthur Heitzer**

Human Rights Defense Center Kerry McLean **Daniel Meyers** Jeanne Mirer **NLG Cuba Subcommittee** William Quigley **Andrew Reid Lucy Rodriguez**

Ann Schneider Susan Scott **Newland Smith Judy Somberg Uri Strauss** Jan Susler **Paul Wright Emily Yozell**

THANK YOU TO MICHAEL DEUTSCH FOR ALL YOUR WORK!

From Margaret P. Levy, West Hartford, CT

The Quixote Center Board and Staff congratulate you, Noelle, our friend and companion in seeking justice.

You are an inspiration.



For Michael Deutsch who richly deserves the Ernie Goodman Award

Marty Stolar & Elsie Chandler

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CONGRATULATIONS...

...to all 2016 Convention Honorees, including **NPAP members Michael Deutsch** and **Javier Maldonado**, for their outstanding contributions to ensuring justice for all.

National Police Accountability Project 499 7th Ave., New York, NY www.npapjustice.org

Three great reasons for our active, committed support of the National Lawyers Guild:
Audrey Bomse, Michael Deutsch, Soffiyah Elijah.

Lucky Us. Dan Meyers Joan Max Reinmuth For their dedication to justice and especially to the freedom for all U.S. political prisoners, I salute Mike, Soffiyah, Audrey and Noelle

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Free Palestine!

Bob Boyle

Sincere appreciation to the NLG National Office Staff

King Downing Daniel McGee
Lisa Drapkin Tasha Moro
Pooja Gehi Traci Yoder

from former NLG National Office Staffs and Collectives

Phyllis Bennis Holly Sullivan Hazleton Rick Best Ian Head Dana Biberman Alicia Kaplow Karen Jo Koonan Heidi Boghosian Jeffrey Kupers Kevi Brannelly Wini Leeds Sylvia Cedillo Kenneth Cloke Joseph Lipotsky Bernadine Dohrn Michel Martinez Daniel Mayfield Barbara Dudley Carol Grumbach

Carlin Meyer
Jamie Munro
Vernell Pratt
Corinne Rafferty
Franklin Siegel
Gunnar Sievert
Marina Sitrin
Elizabeth St. Clair
Deborah Weimer
Dale Wiehoff

Michael Ratner presente!

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Congratulations to All This Year's Honorees

From

The John Marshall Law School Restorative Justice Project

Bringing Peace and Justice to the Chicago Public Schools

315 South Plymouth Court Chicago, Illinois 60604 312-427-2737 www.jmls.edu The Rosenberg Fund for Children salutes our friends

Michael Deutsch Soffiyah Elijah Noelle Hanrahan & the other honorees

for their unyielding work for justice



Supporting the Children of Resistance Since 1990

www.rfc.org

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The Redwood Justice Fund

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(founded by Judi Bari & Tanya Brannan, Esq.)

Salutes NLG Legal Worker of the Year 2016 Noelle Hanrahan, P.I.

"Noelle has dedicated her life to helping prisoners speak to the other citizens of this society. She is one of the most effective prison right investigators in the country because she doesn't speak for the prisoners, she makes it possible for us to hear them speak for themselves. I think Noelle deserves this award because she gets work done. And she isn't afraid to win."

Board Vice President Karen Rudolph, Esq.

Bit.ly/PrisonRadio

In Memory of our Friend Michael Ratner

Rabinowitz, Boudin, Standard, Krinsky & Lieberman, P.C. New York, New York

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TERRY GILBERT & JACQUELINE GREENE

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Extend their congratulations to

Michael Deutsch

as recipient of the Ernie Goodman Award and for all the great work he has done on behalf of political prisoners and oppressed people.

FRIEDMAN & GILBERT

55 Public Square, Suite1055 Cleveland, Ohio 44113 FriedmanAndGilbert.com

The National Lawyers Guild thanks the following supporters

Sheila Dugan The Jericho Movement for Amnesty and w Freedom for All Political Prisoners Carlin Meyer William "Bill" Montross Maria Baldini-Potermin Deborah Rand Rebecca Shapless

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Congratulations

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Soffiyah Elijah

2016 Law for the People Award Honoree We salute you for your steadfast commitment to the human rights and dignity of all incarcerated people, and for having led the CA with honor, courage, and distinction for the past five years.

We love you.

The Correctional Association of New York



Thank you Honorees for your steadfast commitment to Justice.

> Thank you NLG for being there for people in struggle.

Holly Maguigan and Abdeen Jabara

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Matt Piers, Kalman Resnick and the law firm of HSPRD congratulate our friend and colleague

Michael Deutsch

for an outstanding career, fighting in the courts for justice and social progress.

70 West Madison Street, Suite 4000, Chicago, IL



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We join the NLG in celebrating Audrey Bomse's lifelong work as a fearless political and social justice activist, as well as a passionate "lawyer for the people". We continue to be inspired by your dedication and commitment to just causes across the globe. You are not only a tireless fighter but also a wonderful, attentive and loving mother, grandmother and friend. Thank you for being who you are.

Venceremos!

Love, Your family and friends

Dan, Corinna, Brahim, Margot, Sydney, Josh, Kacie, Julien, Margarita, Maggie, Susan, Val, Azadeh, Hal, Yonit, Anaheed, Malik, Ann, Ujju, Greta, Sultana, Amaranta, Hilary, Lubna, Mireille, Lillian and Larry

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Congratulations to the courageous Albert Woodfox, Noelle Hanrahan and all of this year's honorees. Many thanks to the National Lawyers Guild for your tireless work for human rights, civil liberties and social justice.

-People's Rights Fund

So proud of all the honorees!

You Always Stand for Justice No Matter What!

> Bill Quigley New Orleans

Ethel Rosenberg was not a spy and her execution was wrongful

#ExonerateEthel



Sign the petition at rfc.org/ethel calling on President Obama to exonerate Ethel

Stop by the Rosenberg Fund for Children table or visit rfc.org/ethel to learn more

Congratulations!

 ${\color{red} \textbf{Soffiyah Elijah}} \; \textbf{(Law For the People Award)}$ Noelle Hanrahan (Legal Worker of the Year).

"Greetings, my friends at the NLG. On a move. Congratulations to all the honorees at this year's convention. Shout out to Sister Soffiyah Elijah, a freedom fighter in the law. She laughs when I tell her I thought she was a Jewish woman years ago.

What does Noelle Hanrahan bring to the table, besides her relentless energy honed on the basketball courts of Stanford? She brings a vision, actualized in Prison Radio, which performs a unique function. It breaks down walls. It brings the voices of the damned, the imprisoned, the oppressed and the dispossessed to you, to millions in America. That, in a time when presidential candidates clamor to build yet more walls is a prodigious and noble feat in itself that deserves your plaudits and praise.

For as many of you have heard me say a hundred times before, America is the prison house of nations. Anything that pulls bricks out of that monstrosity should be applauded. She is, too, a dogged researcher who, as a licensed private investigator, digs into the detritus of the criminal justice system to uncover evidence of violations of the constitution and laws that judges swear to uphold. For this, too, she deserves your kudos.

Thank you for your time. To all your honorees, congratulations. And Noelle? Nicely done.

From imprisoned nation, this is Mumia Abu-Jamal. bit.ly/PrisonRadio

Comradely Greetings from the Seattle Chapter Congratulations to all of this year's Honorees

Congratulations to Soffiyah Elijah who is always for the people!

Elizabeth Sackler & the Sackler Center family 叫

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The International Committee's Palestine Subcommittee says,

THANK YOU, AUDREY!!

for being the Rock of Gibraltar that we depend upon being there for us, always, to save us from our own gaffs of analysis and judgment; hit the nail on its head every time; send us every newsworthy article, courtesy of the Audrey Bomse Palestine/Israel Clearinghouse; and serve us with such love, humor, and deftly light touch as Mother-Hen-in-Chief, without which there would not be a Palestine Subcommittee.

We love you, we need you, and will you still be there when we're 84?

Congratulations to our dear friend Michael

on this well deserved award! We appreciate and admire your years of selflessly supporting the Attica Brothers, the Black Liberation Movement, the Puerto Rican Independence movement, the struggle of the Palestinian people, and other antiracist and anti-imperialist struggles.



From your Knowledge Group friends in Chicago who rely on your thought provoking and insightful analysis. Erica, Ginger, John, Margaret, Melinda, Susan, and Steve

THE INDIANA CHAPTER OF
THE NATIONAL LAWYERS
GUILD CONGRATULATES
MICHAEL DEUTSCH ON
HIS RECEIPT OF THE ERNIE
GOODMAN AWARD AND
THANKS HIM FOR HIS WORK
ON BEHALF OF POLITICAL
PRISONERS EVERYWHERE.



COUNTY CLERK 09/24/2017

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Congratulations to Michael Deutsch

From Attica to Puerto Rican independistas to Muhammed Salah to Rasmea and beyond, you have always been there for our people!

Steven Saltzman 200 S. Michigan, Ste. 201 Chicago, Illinois 60604 (312) 427-4500 SSaltzlaw@gmail.com

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Michael, our friend and mentor

Ed & Lorry

The International Committee Celebrates and Congratulates Audrey Bomse, Co-Chair of the Free Palestine Subcommittee and Deserving Recipient of the Debra Evenson Veneceremos Award for International Human Rights Work.

Here she is with the 2011 Joint Guild Delegation on the Streets of Tunisia.



Le Dressay & Company

Le Dressay & Company is proud to support the important work of the National Lawyers Guild.

Le Dressay & Company represents clients in complex commercial, civil, and criminal litigation in Canada and the State of Arizona.

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The Los Angeles Chapter of the National Lawyers Guild salutes this year's #Law4ThePeople Honorees:

Soffiyah Elijah Albert Woodfox Michael Deutsch Audrey Bomse Javier Maldonado Noelle Hanrahan Emily Bock

"We need to do more than just what is right.
We need to join together and right what is wrong."

-Leonard Peltier



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Congratulations, Javier!

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Looking forward to seeing the work of your Latino litigator superpowers in the years to come.

Andrade Legal

Immigration Law

Congratulations to the Guild for its longtime struggle for peace and justice.

The Law Offices of Dorfman & Dorfman 72 Guy Lombardo Ave #2 | Freeport, NY 11520 (516) 379-0500

Congratulations, Audrey, for a well deserved award!
And congratulations to all the honorees for your important and amazing work.

- Cathy Dreyfuss

Congratulations Emily on the C.B. King Award!

We're so proud of you!

Your Temple Law family

The NLG National Office congratulates the National Immigration Project of the NLG on their 45th year of fighting for immigrants' rights.

Happy anniversary, NIPNLG!



I want to thank the National Lawyers Guild for all the help they have given to Veterans for Peace to effect the freedom to stand at the Vietnam Memorial in New York City 24/7.

-John K. Spitzberg

Past President, Local 099 Veterans for Peace, Industrial Workers of the World NYSCEF DOC. NO. 25

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The **DC NLG chapter** acknowledges honorees Albert Woodfox, practitioner Michael Deutsch and ALL of the honorees at the 2016 Law for the People Convention.

Please join us in **August 2017** for the **80th Anniversary** Law for the People Convention, in Washington, DC! We will mark this special anniversary with a great convention, including radical lawyers, activists, guests and freedom fighters from across the country.

Hope to see you there!



Congratulations to Chicago NLG member Max Suchan, the first NLG Leonard I. Weinglass Memorial Fellow!

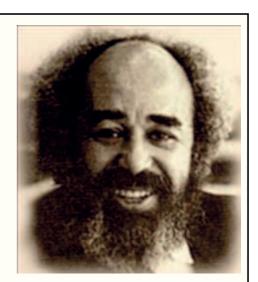
Max will be working with the Chicago Community Bond Fund to increase volunteer capacity and help develop organizational strategies to end money bond.

The Weinglass Fellowship will be offered annually a new Guild attorney to work on a specific civil rights or civil liberties project.

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Congratulations to the **2016 NLG Haywood Burns Memorial Fellows!**

The Haywood Burns Fellowships are designed to encourage projects in the NLG's tradition of "people's lawyering." The program exists to help students and legal workers apply their talents and skills to find creative ways to use the law to advance justice.



2016 Haywood Burns Fellows

Daniel Fryer, University of Michigan Law School **Equal Justice Initiative**

Martha Laura Garcia, Loyola University Chicago School of Law Illinois Migrant Legal Assistance Project

Joelle Eliza M. Lingat, CUNY Law Northeast New Jersey Legal Services Employment Opportunity Project

> **Anya Morgan,** University of Texas School of Law Sylvia Rivera Law Project

> > **Crystal Peters**, Brooklyn Law School Center for Popular Democracy

Mark Shervington, Legal Worker NYC-NLG Parole Preparation Project

Special thanks to all those NLG members and allies who donated to the 2016 Haywood Burns Fellowship Fund!

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YOU'RE NOT AS YOUNG AS YOU USED TO BE.

DON'T LET THE VISION DIE.

REMEMBER THE GUILD IN YOUR WILL.

National Lawyers Guild Foundation

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2015 Banquet Donors

The National Lawyers Guild Foundation thanks our generous donors. Your support helps build a stronger Guild!

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Arthur Heitzer Avra Wing

Azadeh Shahshahani Barbara Dudley

Barbara Newman Barbara Rhine Benjamin Stein

Carpenter & Mayfield

Cathy Dreyfuss

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National Immigration Project of the NLG

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Neil Fox

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Pasquale Lombardo
Priscilla Orta-Wenner
R. Michael Flynn
Rachel Gendell

Richard Soble & Barbara Kessler

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Urszula Masny-Latos

Val Carlson

William Monning

We make every effort to correctly list each donor's name and extend our heartfelt apologies for any mistakes. Please contact nlgfoundation@nlg.org for corrections.