

12-Person Jury

Hearing Date: 5/18/2026 9:30 AM

Location: Court Room 2402

Judge: Price Walker, Allen

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**IN THE CIRCUIT COURT OF COOK COUNTY
CHANCERY DIVISION**

YOUSUF AHMAD, SAM SHEIKALI,
MOHAMED SHEDOU, CHANDRA
HASSAN, LAILA ALI, and LAURA
GOLDSTEIN

Plaintiffs,

v.

MEGAMOT SHALOM D/B/A CANARY
MISSION, STOPANTISEMITISM,
CENTRAL FUND OF ISRAEL,
JONATHON BASH, JASON AGUILAR,
SARAH HANNAH SHENKAR, HAGAI
AMTON, LIOR FROBEK, and ELI
GOFF-GEFFEN

Defendants.

Case No.: 2026CH02500

CLASS ACTION COMPLAINT AND JURY DEMAND

NOW COME Plaintiffs YOUSUF AHMAD, DR. SAM SHEIKALI, MOHAMED SHEDOU, DR. CHANDRA HASSAN, LAILA ALI, and LAURA GOLDSTEIN, on behalf of classes of Plaintiffs residing in the State of Illinois who have been doxed by the Defendants, by and through undersigned counsel, bringing this class action against Defendants MEGAMOT SHALOM D/B/A CANARY MISSION (“CANARY MISSION”), STOPANTISEMITISM, CENTRAL FUND OF ISRAEL, JONATHON BASH, JASON AGUILAR, SARAH HANNAH SHENKAR, HAGAI AMTON, LIOR FROBEK, and ELI GOFF-GEFFEN under the Illinois Civil Liability for Doxing Act and

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individual claims for false light invasion of privacy. In support of their claims, Plaintiffs state as follows:

INTRODUCTION

1. This is an action brought by individuals who have been systematically targeted, surveilled, and publicly harassed by Defendants through a coordinated online doxing campaign designed to chill their free speech rights, endanger their safety, and inhibit their educational, professional, and social opportunities. Plaintiffs bring their class action doxing claims under the Illinois Civil Liability for Doxing Act (740 ILCS 195) (“the Act”), and bring individual claims under Illinois common law for false light invasion of privacy.

2. Plaintiffs bring their doxing claims on behalf of a class of hundreds of other residents of Illinois who, like Plaintiffs, have been doxed by Defendants.

3. Plaintiffs seek injunctive and declaratory relief, damages, and any other appropriate legal and equitable remedies.

JURISDICTION AND VENUE

4. This Court has subject matter jurisdiction pursuant to Section 735 ILCS 5/2-209 of the Illinois Code of Civil Procedure, because the commission of tortious acts by Defendants occurred within the State of Illinois.

5. Venue is proper in Cook County pursuant to 735 ILCS 5/2-101 because a substantial part of the transactions and occurrences giving rise to Plaintiffs’ claims took place in Cook County. Key elements of Plaintiffs’ claims—including the publication and dissemination of identifying information about Plaintiffs and the resulting economic,

reputational, and emotional injuries—occurred in Cook County, where certain Plaintiffs reside and experienced the harms caused by Defendants’ conduct.

6. Because the alleged doxxing caused significant economic injury, fear of bodily harm, and substantial disruption to the lives of Plaintiffs residing in Cook County, and because the information published by Defendants enabled the identification and targeting of those individuals within this County, the causes of action asserted herein arose, at least in part, in Cook County. Venue is therefore proper in this Court because at least some part of the transactions giving rise to Plaintiffs’ claims occurred in Cook County.

7. Canary Mission is a foreign organization that targets and publishes the personal information of Americans, including residents of Illinois, and therefore this Court has jurisdiction because Canary Mission has committed “a tortious act within this State”. 735 ILCS 5/2-209(a)(3).

8. Additionally, Canary Mission has, through its doxing of hundreds of Illinois residents, created sufficient contacts in Illinois to satisfy federal and Illinois due process. *See Russel v. SNFA*, 2013 IL 113909; 735 ILCS 5/2-209(c).

9. StopAntisemitism is a New York based organization that that targets and publishes the personal information of Americans, including residents of Illinois, and therefore this Court has jurisdiction because StopAntisemitism has committed “a tortious act within this State”. 735 ILCS 5/2-209(a)(3)

10. Central Fund of Israel and the individually named defendants Jonathon Bash, Jason Aguilar, Sarah Hannah Shenkar, Hagai Amton, Lior Frobek, and Eli Goff-Geffen - through their material support of and material benefit from the unlawful conduct of

Canary Mission - have created sufficient contacts in Illinois to satisfy federal and Illinois due process.

PARTIES

11. Plaintiff YOUSUF AHMAD is an Arab American resident of Kane County, Illinois who has been subject to coordinated acts of doxing by Defendant Canary Mission.

12. Plaintiff DR. SAM SHEIKALI is an Arab American resident of Will County, Illinois who has been subject to coordinated acts of doxing and harassment by Defendant StopAntisemitism.

13. Plaintiff MOHAMED SHEDOU is an Egyptian American resident of Cook County, Illinois who has been subject to coordinated doxing, harassment, and false light by Defendant StopAntisemitism.

14. Plaintiff DR. CHANDRA HASSAN is an Arab American resident of Cook County, Illinois who has been subject to coordinated acts of doxing and harassment by Defendant StopAntisemitism.

15. Plaintiff LAILA ALI is a Pakistani American Muslim and resident of Cook County, Illinois who has been subject to coordinated acts of doxing, harassment, and portrayal in a false light by Defendants StopAntisemitism and Canary Mission.

16. Plaintiff LAURA GOLDSTEIN is a Jewish American resident of Cook County, Illinois who has been subject to coordinated acts of doxing and harassment by Defendant Canary Mission.

17. Defendant MEGAMOT SHALOM d/b/a CANARY MISSION (“Canary Mission”) operates an anonymous website and social media presence used to dox individuals,

including residents of Illinois. Megamot Shalom is a Limited Company registered in Israel. The organization receives its financial support from individuals and organizations in the United States who have earmarked donations listing Megamot Shalom and Canary Mission as the same entity. Multiple investigative journalists have identified Megamot Shalom as the operator of Canary Mission. Upon information and belief, Canary Mission is not registered as a separate entity anywhere. Upon information and belief, Canary Mission is not a registered d/b/a of Megamot Shalom.

18. Defendant STOPANTISEMITISM (“StopAntisemitism”) is a nonprofit organization incorporated in New York that engages in public campaigns to expose individuals it deems antisemitic, frequently targeting individuals who express criticism of the State of Israel or the ideology of Zionism. StopAntisemitism operates a website and social media platforms where it publishes personally identifiable information, social media content, and professional affiliations of targeted individuals, often with calls for their termination or disciplinary action. Plaintiffs allege that StopAntisemitism’s activities constitute doxing and are intended to chill protected speech through harassment and reputational harm.

19. Defendant CENTRAL FUND OF ISRAEL (CFI) is the main US-based fundraiser of Defendant Canary Mission and is based in Cedarhurst, New York. It is a registered 501(c)(3) non-profit organization. CFI solicits donations from other organizations and individuals on behalf of Canary Mission and routes the funds it receives through its 501(c)(3) to Megamot Shalom to fund Canary Mission in Israel. This allows the donor to receive a tax break while maintaining Canary Mission’s desired anonymity.

20. Defendant JASON AGUILAR (Mr. Aguilar) is a board member of Megamot Shalom.

21. Defendant JONATHON “JACK” IAN BASH (Mr. Bash) is the director and founder of Megamot Shalom.

22. Defendant SARAH HANNAH SHENKAR (Ms. Shenkar) is a board member and authorized signatory of Megamot Shalom as of 2024.

23. Defendant ELI GOFF-GEFFEN is an additional officer of the board of Megamot Shalom as of 2024.

24. Defendant HAGAI AMTON is an additional officer of the board of Megamot Shalom as of 2024.

25. Defendant LIOR FROBEK is an additional officer of the board of Megamot Shalom as of 2024.

FACTUAL ALLEGATIONS

26. Israel is a foreign state.

27. In defining “antisemitism” Defendants conflate criticism of Israel and/or Zionism with anti-Semitism.

28. By perpetuating this false equivalency, Defendants portray Plaintiffs as something they are not, even going so far as to accuse Plaintiffs of supporting terrorism and incitement.

29. Defendants maintain websites and social media profiles that directly target individuals, especially students and academics, and including Jewish Americans, who publicly criticize the State of Israel or Zionism, or advocate for Palestinian rights.

30. Defendants' doxing campaigns include the unauthorized publication of personally identifiable information, including photos, full names, social media posts, employment history, and educational information. The personally identifiable information is then attached to false accusations of antisemitism, terrorism support, and other spurious charges.

31. The intent of these acts is to harm, intimidate, silence, and/or punish Plaintiffs and class members for their political beliefs and associations, and to negatively affect their education, employment or professional advancement.

32. Plaintiffs are not public figures and did not consent to the use of their information.

33. Many of the people doxed by Defendants are themselves Semitic.

34. The conduct of Defendants was willful, malicious, and reckless.

35. As a result of being doxed, Plaintiffs experienced significant economic injury, or emotional distress, or feared serious bodily injury or death for themselves or their family, or suffered substantial life disruptions.

36. As described below, Defendants Canary Mission and StopAntisemitism have directly committed the offense of doxing by publishing personally identifiable information about Plaintiffs with the intent to harm them. *See* 740 ILCS 195/15(a)(i).

37. As described below, Defendant CFI and the individually named Defendants Bash, Aguilar, Shenkar, Amton, Frobeck, and Goff-Geffen have materially supported and materially benefited from the unlawful conduct of Defendant Canary Mission.

38. In addition, as described in more detail below, Defendants Canary Mission and StopAntisemitism have knowingly benefited financially from their followers and readers

amplification of their posts, calls and emails to employers and licensing bodies that were made with the purpose of harming Plaintiffs.

39. The financial benefits come in the form of hundreds of thousands of dollars in funding to Defendants from a variety of sources highlighted below to continue to dox, intimidate, and silence criticism of Israel and/or pro-Palestinian voices in the United States.

CANARY MISSION & THE CENTRAL FUND OF ISRAEL

40. Canary Mission is a controversial website that compiles and publishes online dossiers on individuals and organizations it deems anti-Israel or antisemitic, primarily targeting pro-Palestinian activists, students, and academics in North America. The site, which was launched in 2015, collects social media posts, public statements, and affiliations of individuals, presenting them as evidence of alleged extremism or antisemitism.

41. Canary Mission is not registered to do business in the State of Illinois, or on information and belief, in any other state in the United States.

42. In addition, despite listing “Copyright © 2026 Canary Mission Inc. All rights reserved” on its website, searches for “Canary Mission” in the U.S and Israel Copyright database yield zero results.

43. There is no evidence that Canary Mission is incorporated anywhere.

44. Canary Mission’s stated “Mission” is to “document[] individuals and organizations that promote hatred of the USA, Israel and Jews on North American college campuses and beyond. Canary Mission investigates hatred across the entire political spectrum, including the far right, far left and anti-Israel activists.”

45. Its mission statement also states, “By shining a light on hate groups and their members, the public is better informed about bigotry on their campuses and in their communities. Canary Mission believes that we all have the right to know if an individual has been affiliated with movements that routinely engage in anti-Semitic rhetoric and actions, promote hatred of Jews and seek the destruction of Israel.”

46. Canary Mission works to “ensure that today’s radicals are not tomorrow’s employees.” This indicates that at least one of its objectives is to affect the employment prospects of individuals targeted on its website.

47. Canary Mission’s “Ethics Policy” explains:

All Individual and Organizational profile subjects have shown themselves to be either one or more of the following:

- Anti-Semitic according to the U.S. State Department’s Definition
- Supporters of terrorism, terrorists or terrorist organizations e.g. Hamas, PFLP, Hezbollah, Muslim Brotherhood, ISIS, Al Qaeda
- Violating the personal safety of Jews or supporters of Israel
- Disrupting Jewish or pro-Israel speakers or events
- Inciting violence or hatred towards Jews, Israel or supporters of Israel
- Using language or speech that demonizes Jews, Israel or supporters of Israel
- Promoting or enabling BDS in any of its forms, including:
 - BDS against the State of Israel, Israeli products or Israeli companies
 - BDS against individuals, companies or institutions that trade with or have a working relationship with Israeli companies or institutions
 - The academic or cultural boycott of Israel
 - Voting for or choosing to allow campus divestment resolutions to be carried out anonymously or via secret ballot

48. The irony of Canary Mission’s goal of “shining light on hate groups” is that it has gone to great extents to remain anonymous and avoid any legal accountability for its vindictive online presence.

49. In fact, in a recovered internal document, Canary Mission highlights “[a]nonymity as a tool to scare the enemy.”¹

50. Upon information and belief, Canary Mission identified its objective in a 2025 strategic planning document as “Fight[ing] those who hate the Jewish people”, and the group’s niche objective is to “dismantle the anti-Israel network by attacking the messenger, not the message.” *Id.*

51. Canary Mission’s broad mission statement includes targeting of individuals who criticize the state of Israel’s human rights abuses against Palestinians.

52. Canary Mission engages in doxing, blacklisting, and intimidation, aiming to discourage activism by threatening individuals' future employment and reputations.

53. The site gathers publicly available data, including social media posts, photos, university affiliations, and sometimes even employment history.

54. On information and belief, Canary Mission also receives reports from members of the public who wish to use its platform to target an individual for speech critical of the State of Israel or Zionism.

55. Canary Mission then creates detailed online profiles, often framing individuals as antisemitic or extremist based on selective or out-of-context statements.

56. Canary Mission links personal profiles to its ‘organizational’ profiles that are riddled with dead links and links to videos or articles that do not support the claims Canary Mission is making.

57. For example, in Canary Mission’s Boycott, Divestment, and Sanctions profile page, there are at least 16 links that do not support the claims being made by Canary Mission in the cited sentence. Many of those claims are Canary Mission's most

inflammatory – attempting to connect the BDS movement to terrorist organizations like Hamas.

58. The profile, like many of Canary Mission’s profiles, is written to equate peaceful, political protest and dissent with violence and antisemitism in an effort to paint all pro-Palestinian speech as antisemitic and illegitimate.

59. Canary Mission is designed to appear as a well-researched and trustworthy platform, but is in fact a deliberate attempt to mislead well-meaning members of the public, such as employers, patients, or clients who use search engines to research prospective employees, doctors, or business partners.

60. On information and belief, profiles are optimized for search engines, meaning that when members of the public search a person's name, their Canary Mission profile often appears among the top results.

61. Some students and professionals have reported losing job opportunities or experiencing threats and/or harassment due to being featured on the site.

62. Some activists have reported receiving anonymous threats or being contacted by employers or potential employers regarding their Canary Mission profile.

63. Canary Mission has been widely condemned by human rights organizations, academics, and free speech advocates who argue that it stifles debate and punishes individuals for expressing political opinions.¹

¹ See e.g. [This pro-Israel group keeps a blacklist. Now it’s taking credit for deportations](#), Zack Beauchamp, Vox.com, Updated April 25, 2025 at 8:19 am, [Canary Mission, the controversial organization targeting student activists, explained | Vox](#); [Exposing Canary Mission: A Resource for College and University Leaders](#), Committee on Academic Freedom, Middle East Studies Association of North America, [Exposing_Canary_Mission.pdf](#)

64. The effect is that employers, particularly in fields like government, law, and academia, are deterred from hiring individuals accused of extremism or antisemitism regardless of the validity of those allegations.

65. Despite criticism, Canary Mission continues to be active, regularly updating its database.

66. The website does not disclose its operators. However, investigative journalists have linked Canary Mission to Defendant Megamot Shalom.²

67. Upon information and belief, including through publicly available investigative reports, Megamot Shalom collects funds on behalf of Canary Mission and directly or indirectly implements part or all of Canary Mission's operations.

68. Upon information and belief, donations to Canary Mission through Megamot Shalom are collected in the United States by Defendant Central Fund of Israel (CFI), a New York nonprofit. The Central Fund has collected funds for Canary Mission from individual and institutional donors, such as the Diller family and San Francisco's Jewish Community Federation. Because the Central Fund of Israel is a registered charity, donors receive tax exemption for donations to Canary Mission made through the Central Fund of Israel.

69. Upon information and belief, CFI solicits and receives funds in the state of Illinois.

70. Upon information and belief, CFI knowingly funds Canary Mission's doxing activities and coordinates with Canary Mission's leadership to support its doxing activities.

² <https://www.thenation.com/article/world/canary-mission-israel-covert-operations/>, last checked June 5, 2025.

71. At all relevant times, Canary Mission, Megamot Shalom, and the Central Fund of Israel operated in concert as part of a coordinated enterprise designed to fund, operate, and disseminate the Canary Mission project. Upon information and belief, the Central Fund of Israel solicited and collected tax-deductible donations in the United States that were earmarked for or directed toward the activities of Canary Mission and then transferred those funds to Megamot Shalom and related entities responsible for operating the website. Defendants failed to maintain meaningful separations between the entities' activities and instead used the corporate structure as a conduit through which funds raised in the United States were used to finance the identification, research, and publication of profiles on the Canary Mission website. As a result, the entities functioned as alter egos of one another, sharing common purposes, financial interdependence, and coordinated decision-making regarding the operation of the Canary Mission project. Respecting the corporate separateness of these entities would therefore sanction injustice by allowing Defendants to shield themselves from liability while continuing to carry out the coordinated doxing campaign alleged in this Complaint.

72. The Individual Defendants Jonathon Bash, Jason Aguilar, Sarah Hannah Shenkar, Hagai Amton, Lior Frobek, and Eli Goff-Geffen's actions were undertaken not merely as passive corporate officers but as active participants in the tortious conduct alleged herein. Upon information and belief, each Individual Defendant exercised operational authority over aspects of the Canary Mission project, including approving funding decisions, directing research into targeted individuals, reviewing or authorizing the publication of profiles, and overseeing the continued maintenance and dissemination of those profiles on the website. These actions constitute personal participation in the unlawful conduct described in this

Complaint and were undertaken with knowledge that the resulting harms would be felt by individuals in the United States, including in Illinois.

73. Defendants' conduct was purposefully in-part directed at Illinois. Upon information and belief, Defendants knew that the Canary Mission website targeted students, academics, and activists residing in the United States, including individuals residing in Illinois, and that the publication of profiles containing personal identifying information would foreseeably cause reputational, professional, and safety-related harms in those jurisdictions. Defendants intentionally collected, curated, and published information about Plaintiffs and similarly situated individuals with the knowledge that the effects of those publications would be felt primarily where the targeted individuals lived, studied, and worked, including in Illinois. Defendants' conduct therefore constitutes intentional tortious activity expressly aimed at this forum, and the injuries caused by Defendants' actions were suffered in Illinois, making the exercise of personal jurisdiction consistent with the Due Process Clause and the Illinois long-arm statute.

STOPANTISEMITISM

74. StopAntisemitism is a U.S.-based group founded in 2018 by Liora Rez. Its stated aim is to combat antisemitism by publicly exposing individuals and organizations it deems antisemitic.

75. StopAntisemitism is a nonprofit organization registered in the state of New York with tax exempt status.

76. The StopAntisemitism mission statement describes itself as "a grassroots watchdog organization dedicated to exposing groups and individuals that espouse incitement towards the Jewish people and State and engage in antisemitic behaviors."

77. The organization has been criticized for its aggressive tactics, particularly its practice of highlighting individuals' statements and actions on social media platforms and calling for them to be held “accountable” for their criticisms of Israel.

78. StopAntisemitism actively monitors social media and other public platforms to identify individuals it deems antisemitic. The organization then shares these individuals' names, photos, social media profiles, and employer or school affiliations with its substantial online following.

79. The above strategy often includes direct appeals to employers or educational institutions to take disciplinary action against the individuals in question.

80. StopAntisemitism also encourages the public to contact the individual’s employer or school, alongside an email address to the employer or school, to have the person fired from their job or disciplined/expelled from school.

81. StopAntisemitism has over 334,000 followers on X.com and 233,000 followers on Instagram.

82. In its 2024 Annual Report, StopAntisemitism boasted that it had a “highly successful year with hundreds of wins including firings, suspensions, expulsions, arrests, and notable incidents.”

83. PStopAntisemitism is privately funded, with significant support from the Milstein Family Foundation and the Merona Leadership Foundation.³ The latter pays the salary of Executive Director Liora Rez and provides approximately \$270,000 for the organization's expenses.

³ <https://www.washingtonpost.com/technology/2024/04/16/stop-antisemitism-twitter-zionism-israel/>, last checked June 5, 2025.

84. StopAntisemitism's doxing of individuals critical of Israel or US foreign policy pertaining to Israel is not motivated by a desire to stop real antisemitism. This is exemplified by the organization's consistent targeting of semitic people who criticize the state of Israel or Zionism. This includes individuals who are Jewish, Palestinian (who are also semitic), and other semitic peoples from the Middle East.

85. StopAntisemitism is not concerned with combatting antisemitism, but rather, it is a tool to control, coerce and pressure people into not exercising their first amendment rights. Its purpose is to quell criticisms of Israel, a foreign state who relies on US funding and support to continue engaging in war crimes in the Middle East.

86. StopAntisemitism's goal in doxing individuals is not only to punish those who have criticized Israel or US support for Israel, but to deter others from expressing similar views over fear they will also be doxed by the organization.

NAMED PLAINTIFFS

Yousuf Ahmad

87. Mr. Ahmad is a recent graduate from the University of Illinois Urbana Champaign.

88. Mr. Ahmad was doxed by Canary Mission, who shared videos and pictures of him, took screenshots of and linked his social media pages, and revealed where he worked and where he went to school. Canary Mission's profile on Mr. Ahmad is still active on its website.

89. At the time he was doxed, Mr. Ahmad was a member of the University of Illinois student government.

90. Mr. Ahmad voted in support of a Boycott, Divestment, and Sanctions (“BDS”) resolution; that, in Canary Mission’s determination, was enough to dox Mr. Ahmad.

91. Canary Mission, as is its practice, misconstrued Mr. Ahmad’s vote as a student government representative as violent, antisemitic, and in support of terrorism.

92. Mr. Ahmad has experienced emotional distress, stress, and anxiety as a result of being doxed.

93. He fears the impact Canary Mission’s hyperbolic and inaccurate post will have on future employers searching for his name on the internet.

Dr. Sam Sheikali

94. As an emergency doctor and independent contractor, Dr. Sheikali works for a variety of hospitals in Chicago and the surrounding area.

95. His livelihood is dependent on his consistent professionalism and good reputation in the close-knit emergency medical field.

96. Dr. Sheikali has expressed political opinions on his Facebook and Instagram accounts about the conflicts in Gaza and Lebanon.

97. In response to his political opinions, Dr. Sheikali’s name and photo, his current employer, and the town in which he currently works were published against his will by Defendant StopAntisemitism.

98. His brother’s name and photo were also published by StopAntisemitism.

99. StopAnitsemitism publicized this identifying information with the stated intent of trying to destroy Dr. Sheikali’s career.

100. On or around March 31, 2025, StopAntisemitism doxed Dr. Sheikali, accusing him of antisemitism while at the same time implying all Palestinians who died in Gaza were terrorists.

101. On or around April 19, 2025, StopAntisemitism posted again on X a photo of Dr. Sheikali, accusing him of “glorif[ying] terrorists” and tagging the hospital where he currently works saying “What is his employer, @OSFHealthCare doing to protect their Jewish patients from this hate?”

102. On or around May 27, 2025, the American Board of Emergency Medicine (ABEM) sent a letter to Dr. Sheikali warning him that if he did not stop his political posting, he would be at risk of losing his Board certification.

103. The ABEM letter explicitly states that Dr. Sheikali’s political posting was the reason for the warning, and not the quality of care that Dr. Sheikali provides to his patients.

104. StopAntisemitism’s doxing of Dr. Sheikali has jeopardized his career as losing board certification can have serious consequences.

105. In addition, Dr. Sheikali’s doxing has caused severe emotional distress for he and his wife who fear for their safety and the safety of their three small children.

106. Dr. Sheikali and his family live in the area where a 6-year-old Palestinian boy was stabbed to death three years ago.

Mohammed Shedou

107. Mohammed Shedou works in IT management for healthcare companies.

108. Mr. Shedou used to regularly post pro-Palestine and anti-violence messages and comments on X.

109. In response to his posts, StopAntisemitism published Mr. Shedou's name, photo, and employer against his will.

110. On or around September 12, 2024, StopAntisemitism posted on X a photo of Mr. Shedou, accusing him of spreading "dangerous antisemitism" with his posts.

111. StopAntisemitism tagged his employers, asked if he is "an employee that reflect[s] your values", and included the HR email for one of the companies.

112. The Defendant's posts incited harassment and demands for the State Department to deport him despite the fact that Mr. Shedou is a U.S. Citizen.

113. The emails and tweets led his employer to open an investigation into Mr. Shedou and issue him a formal warning that appeared in his employee record.

114. Fortunately, his manager acknowledged that there were no performance issues and advocated on his behalf.

115. After further review, his employer removed the level 1 warning affirming that he was not antisemitic.

116. That did not stop StopAntisemitism from following up on its original post, reposting and again calling for Mr. Shedou's firing in December 2024 and June 2025.

117. Mr. Shedou has set up a Google services account to track his personal address and when pinged, he immediately contacts the website or organization and has his address removed. He does this for the sole purpose of minimizing the chance that his doxers will find his home address.

118. As a result of his doxing, Mr. Shedou has experienced emotional distress and fear of serious bodily injury for him and his wife, as well as the substantial life disruption of trying to eliminate the existence of his home address from online sources.

Dr. Chandra Hassan

119. Dr. Hassan works in a highly specialized medical field.

120. As a medical professional in a small, specialized field, his reputation as a person and as a professional has a significant impact on his practice.

121. Since October 7, 2023, Dr. Hassan has commented several times on the conflict in Gaza via social media.

122. As a result of this, he has had his name, photo, and workplace published against his will.

123. On or around August 1, 2024, Defendant StopAntisemitism posted on X a photo of Dr. Hassan along with his employment profile.

124. StopAntisemitism encouraged its followers to contact Dr. Hassan's employer to call for his firing.

125. In the days and weeks following the post, Dr. Hassan's employer received hundreds of calls and emails demanding he be fired.

126. Although his employer has remained supportive of Dr. Hassan's work and performance, he fears what continued harassment might cause.

127. Consequently, Dr. Hassan has had to change his online presence, including by remaining silent on issues - like the genocide in Gaza - that matter deeply to him.

Laila Ali

128. Ms. Ali is a Pakistani American Muslim who currently resides in Chicago.

129. On or around January 3, 2024, Ms. Ali was doxed by StopAntisemitism on X .

130. Ms. Ali was targeted after she was filmed removing a propaganda poster. StopAntisemitism shared a video of the incident seeking identifying information from the public.

131. In subsequent posts, StopAntiSemitistim shared the personally identifying information that it learned and tagged her employer, prompting widespread online harassment and calls for her termination.

132. Ms. Ali was subjected to continued doxing and harassment on both X and Instagram, including repeated sharing of the video and targeted abuse by users encouraged by these posts.

133. Comments included calling her a “monster”, demanding her deportation, and insisting she be fired.

134. On or around January 4, 2024, Mindful Care terminated Ms. Ali’s employment and publicly made a statement on X to confirm the decision in response to StopAntisemitism’s call for her termination.

135. Defendant StopAntisemitism celebrated and amplified the termination statement as a success and an example of its influence.

136. The comments included further derogatory and harassing comments directed at Ms. Ali.

137. Ms. Ali was later doxed by Defendant Canary Mission, which published her personal and professional details and added further misleading commentary on the original posts.

138. Defendant Canary Mission also posted information about her social media accounts which led to her deactivating her social media accounts temporarily.

139. As a result of these coordinated actions, Plaintiff lost her job and experienced serious emotional distress and anxiety.

Laura Goldstein

140. For over two decades, Professor Laura Goldstein has taught English at Loyola University Chicago.

141. During this time, Prof. Goldstein has been an active voice on injustice and social change, and they have become particularly well-known for advocating for Palestinian rights.

142. As a result of this leadership, Loyola students asked Prof. Goldstein to advise the campus chapter of Students for Justice in Palestine.

143. In April 2024, defendant Canary Mission published Prof. Goldstein's name, place of work, city of residence, and relationship to Loyola University of Chicago's chapter of Students for Justice in Palestine.

144. This doxing initiated repeated, targeted harassment.

145. This harassment included graphic violent emails to Prof. Goldstein threatening to "rape" them and to "cut off" their "tits."

146. Because of the threats, Prof. Goldstein had to make their social media profiles private.

147. Prof. Goldstein later received a physical typed letter in their school mailbox — the location of which is not made public.

148. The letter threatened that the authors will speak to the university's president and get Prof. Goldstein fired.

149. These directed, violent threats, coupled with the physical letter demonstrating knowledge of private, offline aspects of their life and work, have caused Prof. Goldstein large amounts of stress and fear for their personal safety.

CLASS ACTION ALLEGATIONS

150. Plaintiffs bring this action on behalf of a class pursuant to 735 ILCS 5/2-801. The proposed class is defined as:

All residents of Illinois about whom a social media post, website profile, or other online content published by Canary Mission, StopAntisemitism.org, or any of their affiliated platforms has disclosed a combination of: (i) their name, prior legal name, alias, mother's maiden name, or date or place of birth, and (ii) a photograph, home address, phone number, email address, social media account, biometric data, medical or mental health information, financial data, education or employment information, consumer data, gender identity, sexual orientation, sexually intimate visual depictions, or access credentials for teleconferencing or virtual meeting platforms.

151. The proposed class satisfies the requirements of 735 ILCS 5/2-801(1) because the class is so numerous that joinder is impracticable. On information and belief, the class includes over 300 residents of the State of Illinois.

152. The proposed class meets the commonality requirement under 735 ILCS 5/2-801(2) because there are common questions of law and fact, including whether Defendants violated the Act by doxing residents of the State of Illinois, and the common questions predominate over any questions affecting only individual members.

153. Plaintiffs' claims are typical of the class, as all members of the putative class have claims under the Act.

154. The proposed class meets the adequacy requirements under 735 ILCS 5/2-801(3). Plaintiffs Yousuf Ahmad, Dr. Sam Sheikali, Mohamed Shedou, Dr. Hassan, and Laura Goldstein are each adequate representatives of the proposed classes. Their claims are factually and legally similar, and they would be entitled to the same type of injunctive relief under the claims brought. Plaintiffs would defend the rights of the proposed class members fairly and adequately.

155. The proposed class satisfies 735 ILCS 5/2-801(4) because prosecuting the cases separately would create the risk of inconsistent or varying adjudications with respect to individual class members that would establish incompatible standards of conduct for the party opposing the class.

156. The proposed class also satisfies 735 ILCS 5/2-801(4) because the parties opposing the class have acted or refused to act on grounds that apply generally to the class, so that final injunctive relief or corresponding declaratory relief is appropriate respecting the class as a whole.

157. The proposed class also satisfies 735 ILCS 5/2-801(4) because questions of law or fact common to class members predominate over any questions affecting only individual members, and a class action is superior to other available methods for fairly and efficiently adjudicating the controversy.

158. Class treatment is appropriate for liability and injunctive relief.

CAUSES OF ACTION

COUNT I (PROPOSED CLASS) — VIOLATION OF ILLINOIS CIVIL LIABILITY FOR DOXING ACT (740 ILCS 195) BY DEFENDANTS CANARY MISSION AND STOP ANTISEMITISM

159. Plaintiffs incorporate all prior allegations and are fully set forth herein.

160. A party engages in the act of doxing when that party intentionally publishes another person's personally identifiable information without that person's consent, and "the information is published with the intent that it be used to harm or harass the person and with knowledge or reckless disregard that the person would be reasonably likely to suffer death, bodily injury, or stalking." *See* Illinois Civil Liability for Doxing Act, 740 ILCS 195/10.

161. Doxing occurs when the publishing of the person's information causes the person significant economic injury or emotional distress, or to fear serious bodily injury or death, or causes the person to suffer a substantial life disruption, provided the person is identifiable from the information published. 740 ILCS 195/10.

162. Defendants Canary Mission and Stop Antisemitism knowingly published personally identifiable information of Plaintiffs and other class members with the intent to harass or harm Plaintiffs. They did so with knowledge or reckless disregard that the people doxed would be reasonably likely to suffer death, bodily injury, or stalking.

163. Defendants' Canary Mission and StopAntisemitism's own posts call for firing the people they dox and celebrate when those people lose their jobs.

164. Stalking occurs when a person knowingly engages in a course of conduct that would cause a reasonable person to fear for their safety or suffer emotional distress. *See* 720 5/12-7.3(a).

165. As defined by the stalking statute, a course of conduct can include conduct by third parties and can include contact via electronic communications. 720 ILCS 5/12-7.3(c)(1).

166. Defendants Canary Mission and StopAntisemitism's profiles and posts usually include an individual's social media profile and a photograph of the individual. Often it will also include the individual's city and state of residence, and institutional affiliations.

167. Many of Defendants Canary Mission and StopAntisemitism's posts include comments with aggressive, racist, dehumanizing language.

168. Some posts call for additional information and encourage the followers of Defendants to find out more about the doxed person.

169. Defendants Canary Mission and StopAntisemitism knowingly or with reckless disregard shared personally identifiable information that would be reasonably likely to allow their followers to stalk Plaintiffs.

170. The publication of personally identifiable information placed Plaintiffs and putative class members in reasonable fear of physical harm and led to harassment, threats, emotional distress, the loss of jobs and/or job opportunities, and substantial life disruptions.

171. Plaintiffs have received threats and harassing messages, have had to install security cameras at home and work, have been investigated by their employers, threatened with and/or terminated from employment, and/or have had to hide or remove their home address from the internet for fear of what might happen if it is exposed.

172. Defendants' actions were not protected by the First Amendment because they were targeted, malicious, and intended to cause harm, in violation of Plaintiffs' privacy rights, and were done to *suppress* the First Amendment rights of Plaintiffs.

173. Plaintiffs and putative class members are entitled to a finding of liability against Defendants Canary Mission, the Central Fund of Israel and StopAntisemitism, injunctive relief under the statute, and damages.

WHEREFORE, Plaintiffs respectfully request that the Court:

- A. Certify the proposed Class;
- B. Appoint Plaintiffs as Class Representatives and their counsel as Class Counsel;
- C. Enter judgment in favor of Plaintiffs and the Class;
- D. Award compensatory, statutory, and punitive damages;
- E. Enter an injunction prohibiting further doxing of residents from Illinois;
- F. Enter an injunction requiring the removal and deletion of existing content on websites, social media platforms or other public platforms pertaining to residents from Illinois;
- G. Award attorneys' fees and costs as allowed by law;
- H. Grant such further relief as the Court deems just and proper.

**COUNT II: VIOLATION OF ILLINOIS CIVIL LIABILITY FOR DOXING ACT
(740 ILCS 195) BY DEFENDANT CENTRAL FUND OF ISRAEL**

174. Plaintiffs incorporate all prior allegations as if fully set forth herein.

175. The Act provides that a doxed person can seek redress from “any individual or entity that directs one or more persons to violate this Act and that knowingly benefits, financially, or by receiving anything of value, from

- participation in a venture that the individual or entity knew involved a violation of the Act.” 740 ILCS 195/15(a).
176. Defendant Central Fund of Israel collected funds in the United States under its nonprofit status in order to directly and materially support Defendant Canary Mission’s doxing campaigns. Defendant Central Fund of Israel does this with knowledge or reckless disregard that the people doxed would be reasonably likely to suffer death, bodily injury, or stalking.
177. Defendant CFI financially and reputationally benefits from participating in Canary Mission’s doxing activities in this way.
178. Defendant CFI is aware of Canary Mission’s mission and raises revenue on behalf of and in support of Canary Mission’s doxing operation.
179. On information and belief, donors chose CFI and Canary Mission because of its doxing work.
180. On information and belief, Canary Mission does not do other work, so CFI and its donors intend and encourage Canary Mission to continue doxing pro-Palestinian voices with each donation.
181. CFI’s business model relies on American donors wanting to donate to specific organizations in Israel.
182. On information and belief, Canary Mission’s doxing work helps attract donors to donate to more organizations that CFI fundraises for.
183. If all goes according to plan, CFI maintains the anonymity of both donor and recipient and allows for the continued secretive doxing that Canary Mission strives to maintain.

184. CFI is essential to Canary Mission’s work.

185. CFI was providing this support at the time Plaintiffs and putative class members were doxxed by Canary Mission, causing their injuries.

WHEREFORE, Plaintiffs respectfully request that the Court:

- A. Certify the proposed Class;
- B. Appoint Plaintiffs as Class Representatives and their counsel as Class Counsel;
- C. Enter judgment in favor of Plaintiffs and the Class;
- D. Award compensatory, statutory, and punitive damages;
- E. Enter an injunction prohibiting further doxing of residents from Illinois;
- F. Enter an injunction requiring the removal and deletion of existing content on websites, social media platforms or other public platforms pertaining to residents from Illinois;
- G. Award attorneys’ fees and costs as allowed by law;
- H. Grant such further relief as the Court deems just and proper.

COUNT III: VIOLATION OF ILLINOIS CIVIL LIABILITY FOR DOXING ACT (740 ILCS 195) BY DEFENDANTS, JASON AGUILAR, JONATHON BASH, SARAH SHENKAR, ELI GOFF-GEFFEN, HAGAI AMTON, and LIOR FROBEK

115. Plaintiffs incorporate all prior allegations as if fully set forth herein.

116. The Act provides that a doxed person can seek redress from “any individual or entity that directs one or more persons to violate this Act and that knowingly benefits,

financially, or by receiving anything of value, from participation in a venture that the individual or entity knew involved a violation of the Act.” 740 ILCS 195/15(a).

117. Megamot Shalom is a Limited Company registered in Israel.
118. On information and belief, Megamot Shalom operates, directs, administers, and finances Canary Mission.
119. Canary Mission holds itself out as an incorporated entity, but it is not registered or incorporated with any jurisdiction known to Plaintiff.
120. On information and belief, Canary Mission does not have ownership, officers, or corporate structure.
121. Megamot Shalom does not publicly disclose that it operates Canary Mission.
122. However, individuals and organizations in the United States have earmarked donations identifying Megamot Shalom and Canary Mission interchangeably, and funds directed toward Canary Mission are received and administered by Megamot Shalom.
123. Megamot Shalom and Canary Mission operate with such unity of interest and ownership that their separate personalities do not in fact exist.
124. Among other things, Canary Mision lacks an independent corporate existence; its operations, funding, and administration are controlled by Megamot Shalom; and Canary Mission functions as an operational arm or instrumentality of Megamot Shalom rather than as a separate entity. Canary Mission is the website that Megamot Shalom operates.
125. Upon information and belief, each corporate officer of Megamot Shalom, Mr. Bash, Mr. Aguilar, Mr. Goff-Geffen, Mr. Amton, Ms. Shenkar, and Mr. Frobek

(together the “Board Members”) exercised dominion and control over the corporation’s operations, including the administration and finance of Canary Mission and its doxing activities.

126. Upon information and belief, Defendants Mr. Bash, Mr. Aguilar, Mr. Goff-Geffen, Mr. Amton, Ms. Shenkar, and Mr. Frobek personally participated in and directed the doxing campaign carried out through Canary Mission and knowingly caused the publication of personal information with the intent and foreseeable effect of harming Plaintiffs’ safety, employment, educational opportunities, and reputation.
127. Upon information and belief, the Board Members maintain their anonymity by operating Canary Mission as a façade.
128. The Board Members included on Canary Mission’s website symbols of legitimacy (claims of copyright, incorporation, and registration) that appear nonexistent.
129. The Board Members individually financially benefit from their unlawful activities in the state of Illinois.
130. Neither Canary Mission nor Megamot Shalom are organizations registered in the United States let alone the state of Illinois, and yet the Board Members purposefully and regularly operate in the state via the doxing of Illinois residents.
131. The state has a public interest in enforcing its statutes and penalizing the orchestrators of tortious acts that occur in the state. Continuing to adhere to the fiction that Canary Mission is a real organization would lead to the unjust and inequitable outcome that could happen should the Court find a nonexistent entity liable for doxing Illinois residents.

132. That problem is rectified by holding the Board Members personally liable for their direction of the tortious acts alleged.
133. Upon information and belief, the Defendant Board Members direct Canary Mission employees to violate the Illinois Civil Liability for Doxing Act and knowingly receive benefits, including financial benefits and other value, from the doxing in violation of 740 ILCS 195/15(a).
134. This includes the doxing of Plaintiffs and other residents of Illinois, which has led to their injuries.
135. Defendants' conduct was purposefully directed at Illinois and other states within the United States. Defendants knew that the Canary Mission website targeted students, academics, and activists residing in the United States, including individuals residing in Illinois, and that the publication of profiles containing personal identifying information would foreseeably cause reputational, professional, and safety-related harms in those jurisdictions. Defendants intentionally coordinated the collection, curation, and publication of information about Plaintiffs and similarly situated individuals in Illinois with the knowledge that the effects of those publications would be felt primarily where the targeted individuals lived, studied, and worked, including in Illinois. Defendants' conduct therefore constitutes intentional tortious activity expressly aimed at this forum, and the injuries caused by Defendants' actions were suffered in Illinois, making the exercise of personal jurisdiction consistent with the Due Process Clause and the Illinois long-arm statute.

WHEREFORE, Plaintiffs respectfully request that the Court:

- A. Certify the proposed Class;

- B. Appoint Plaintiffs as Class Representatives and their counsel as Class Counsel;
- C. Enter judgment in favor of Plaintiffs and the Class;
- D. Award compensatory, statutory, and punitive damages;
- E. Enter an injunction prohibiting further doxing of residents from Illinois;
- F. Enter an injunction requiring the removal and deletion of existing content on websites, social media platforms or other public platforms pertaining to residents from Illinois;
- G. Award attorneys' fees and costs as allowed by law;
- H. Grant such further relief as the Court deems just and proper.

**COUNT IV (MOHAMED SHEDOU): FALSE LIGHT INVASION OF
PRIVACY BY STOPANTISEMITISM**

186. Plaintiff Mohamed Shedou restates and realleges paragraphs all previously pled paragraphs, and in particular paragraphs 12, 106-117, as if pleaded herein.

187. StopAntisemitism states in its original tweet, "Imagine Jewish colleagues and clients of Shedou!" The clear implication is that it is not safe for Jewish people to be around Mr. Shedou.

188. The statements falsely imputed Mr. Shedou's professionalism and actively sought to harm his professional reputation.

189. The statements imputing Mr. Shedou were false and StopAntisemitism posted it with actual malice or a reckless disregard for its truth.

190. As a result of StopAntisemitism’s regular doxing, Mr. Shedou has had to pay for specific internet security services that alert him when his address is publicized so that he can contact the publisher and have it removed.

191. Additionally, Mr. Shedou has lost hours of work because of the need to respond to his employer’s investigation based on StopAntisemitism’s placing him under false light.

WHEREFORE, Plaintiff respectfully prays that this Court

- A. Award Plaintiff Mohamed Shedou compensatory and punitive damages;
- B. Order Defendant StopAntisemitism to remove posts about Mr. Shedou from its online accounts;
- C. Award any and all other relief this Court deems just and equitable.

**COUNT V (LAILA ALI): FALSE LIGHT INVASION OF PRIVACY BY
STOPANTISEMITISM**

192. Plaintiff Laila Ali restates and realleges all previously pled paragraphs, and in particular paragraphs 14, 127-138 as if stated herein.

193. Defendant StopAntisemitism published a photograph of Ms. Ali with the caption “Imagine being a Jewish patient and dealing with her!”

194. The comment falsely implies that the Plaintiff is incapable of treating Jewish patients fairly, professionally, or ethically. The suggestion that plaintiff would mistreat Jewish patients is not only false, but deeply offensive to any reasonable person.

195. As a direct result of StopAntisemitism’s false statements, Ms. Ali was terminated from her job at Mindful Care and has faced significant economic harm.

WHEREFORE, Plaintiff Laila Ali respectfully prays that this Court

- A. Award Plaintiff Laila Ali compensatory and punitive damages;
- B. Order Defendants Canary Mission and StopAntisemitism to remove posts about Ms. Ali from its online accounts;
- C. Award any and all other relief this Court deems just and equitable.

DEMAND FOR JURY TRIAL

Plaintiffs Yousuf Ahmad, Dr. Sam Sheikali, Mohamed Shedou, Dr. Chandra Hassan, Laila Ali, and Laura Goldstein demand a trial by jury on all issues so triable.

March 16, 2026

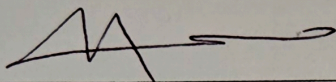
Respectfully Submitted,

BY: /s/Christina Abraham
Christina Abraham, Esq.
Attorney for Plaintiffs

Christina Abraham, Esq.
Attorney for Plaintiffs Yousuf Ahmad, Dr. Sam Sheikali, Mohamed
Shedou, Dr. Chandra Hassan, Laila Ali, and Laura Goldstein
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[Cook County Bar # 46497](#)

§1-109 VERIFICATION BY CERTIFICATION

Under penalties as provided by law pursuant to §1-109 of the Code of Civil Procedure (735 ILCS 5/1-109), the undersigned certified that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certified as aforesaid that they verily believe the same to be true.



Signature

3 / 16 / 2026

Date

§1-109 VERIFICATION BY CERTIFICATION

Under penalties as provided by law pursuant to §1-109 of the Code of Civil Procedure (735 ILCS 5/1-109), the undersigned certified that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certified as aforesaid that they verily believe the same to be true.

A handwritten signature in black ink, appearing to read "Jason A. [unclear]", written over a horizontal line.


Signature

3/16/2026 _____

Date

§1-109 VERIFICATION BY CERTIFICATION

Under penalties as provided by law pursuant to §1-109 of the Code of Civil Procedure (735 ILCS 5/1-109), the undersigned certified that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certified as aforesaid that they verily believe the same to be true.



Signature

3/12/2026

Date

§1-109 VERIFICATION BY CERTIFICATION

Under penalties as provided by law pursuant to §1-109 of the Code of Civil Procedure (735 ILCS 5/1-109), the undersigned certified that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certified as aforesaid that they verily believe the same to be true.



Signature

03/12/2026

Date

§1-109 VERIFICATION BY CERTIFICATION

Under penalties as provided by law pursuant to §1-109 of the Code of Civil Procedure (735 ILCS 5/1-109), the undersigned certified that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certified as aforesaid that they verily believe the same to be true.

Laila Ali

Signature

3/12/2026

Date

§1-109 VERIFICATION BY CERTIFICATION

Under penalties as provided by law pursuant to §1-109 of the Code of Civil Procedure (735 ILCS 5/1-109), the undersigned certified that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certified as aforesaid that they verily believe the same to be true.



Signature

03/11/2026

Date