



ATTORNEY GENERAL OF MISSOURI
CATHERINE L. HANAWAY

IN THE MATTER OF:

CID No. 26-190

NATIONAL STUDENTS FOR JUSTICE IN PALESTINE

September 23, 2026

CIVIL INVESTIGATIVE DEMAND

TO: NATIONAL STUDENTS FOR JUSTICE IN PALESTINE

Serve:



The Attorney General of the State of Missouri believes it to be in the public interest that an investigation be made to ascertain whether the National Students for Justice in Palestine (“Subject”) or its affiliated chapters, agents, or employees have engaged in or are engaging in any practices declared to be unlawful by § 407.020, RSMo. This investigation will inquire into, among other things, the activities and representations of the Subject in connection with the solicitation of funds in Missouri. The Attorney General has reason to believe that the Subject may have used deception, fraud, false promises, misrepresentation, unfair practices, and/or the concealment, suppression, or omission of material facts within the scope of the Missouri Merchandising Practices Act. The Attorney General’s investigation is based in part on, but is not limited to, public statements and solicitations by the Subject.

The Attorney General believes that You have information, documentary material, and/or physical evidence relevant to the investigation described above. Prompt compliance with this Civil Investigative Demand is mandatory. *See* § 407.080, RSMo. (“A person upon whom a civil investigative demand is served pursuant to the provisions of section 407.040 shall comply with the terms thereof unless otherwise provided by an order of a court.”).

INSTRUCTIONS

1. Unless specifically stated otherwise, please restrict Your search for all information and documents requested below to only the period between January 1, 2021 to the present.
2. For all of Your responses, You must identify—by Bates range, or by file names and locations—the Documents responsive to each particular request.
3. For each Document produced or answer provided, identify by number which request or requests the Document or answer responds to.
4. For requests seeking written answers, provide the answer in **boldface** in a paragraph or paragraphs directly beneath the numerical request.
5. If You have knowledge of a responsive Document or responsive information, but do not have the responsive Document or information in Your possession, custody, or control, Identify the Person that You believe has that Document or information in their possession, custody, or control.
6. If You do not know the answer to a request, Identify the Person that You believe does have that responsive information.
7. Your answers to requests for information must be signed under oath by the Person providing the responsive information. This might entail separate Persons verifying responses to different requests.
8. Provide all material as quickly as possible, which may mean providing responsive material in batches.
9. If You believe that You have responsive materials that are privileged, You must produce a privilege log that identifies each Document or communication, the basis for withholding it, and sufficient information to permit the Attorney General's Office to assess whether it is privileged.
10. The Missouri Attorney General may serve additional or follow-up civil investigative demands on You.
11. Please note that under § 407.080, RSMo, certain acts done with the intent to avoid, evade, or prevent compliance in whole or in part with any civil investigative demand constitute a Class A misdemeanor, which is punishable by fines or imprisonment or both.

12. No extension of the deadline for compliance with this Civil Investigative Demand is effective unless it is reflected in writing by an authorized representative of the Missouri Attorney General.
13. As authorized by § 407.040, RSMo, the Attorney General demands that—no later than 10:00 a.m. CDT on October 26, 2026—You produce responsive documents and information to the Missouri Attorney General’s Office. Submit the Certification of Compliance, all documents, and all responsive information, to:

Louis J. Capozzi III
Solicitor General
Missouri Attorney General’s Office
815 Olive Street, Ste. 200
St. Louis, MO 63101
Louis.Capozzi@ago.mo.gov
(573) 645-9662

DEFINITIONS

As used in this Civil Investigative Demand, the following definitions apply:

1. “You” and “Your” means the NATIONAL STUDENTS FOR JUSTICE IN PALESTINE, and all affiliated chapters, agents, fiscal sponsors, representatives, employees, independent contractors, attorneys, and any other persons acting or purporting to act on behalf of NATIONAL STUDENTS FOR JUSTICE IN PALESTINE.
2. “And” and “or” are to be construed broadly to include both the disjunctive and conjunctive, to be equivalent to “and/or,” to render these Requests as broad as possible.
3. “Communication” means any expression, statement, conveyance, or dissemination of any words, thoughts, statements, ideas, or information, regardless of form, format, or kind. “Communication” includes but is not limited to oral or written communications of any kind, such as telephone conversations, discussions, meetings, notes, letters, agreements, emails or other electronic communications, text messages, facsimiles, and other forms of written or oral exchange that are recorded in any way, including video recordings, audio recordings, written notes, or otherwise. Any Communication that also falls within the definition of “Document” constitutes both a Document and a Communication for purposes of this civil investigative demand.

4. “Document” includes every “writing,” “recording,” and “photograph” as Federal Rule of Evidence 1001 defines those terms, as well as any “duplicate” of any writing, recording, or photograph. “Document” includes, but is not limited to, electronic documents, files, databases and records, including but not limited to emails, voicemails, text messages, calendar appointments, instant messages, MMS messages, SMS messages, iMessages, computer files, spreadsheets, and metadata. The term Document includes every draft of any other material that falls within the definition of Document.
5. “Identify,” when used with respect to a person or entity, means information sufficient to allow the Attorney General to ascertain the current contact information (name, home or business address, telephone number, and email), and, if not a natural person, the current contact information for Your point of contact with the entity or facility Identified, as well as the relationship of that person or entity to You.
6. “Identify,” when used with respect to a fact or event, means information sufficient to allow employees of the Attorney General to ascertain the fact or event with reasonable particularity, and to identify each person believed to have knowledge with respect to the fact or event and each document that refers or relates to the fact or event.
7. “Identify,” when used with respect to a transaction, means to provide information sufficient to allow ascertainment of the banking and financial information of the sending and receiving parties, the method of payment or funds transfer, and the natural persons involved with the transfer or payment.
8. “Identify,” when used with respect to a Communication, means to state with specificity the date of the Communication; the medium of communication; the location of the Communication; the names and aliases of the persons who made the Communication; and the names and aliases of all persons who were present when the statement was made, who received the Communication, who heard the Communication, or who came to know of the content of the Communication at a later time.
9. “Person” means any natural person, corporation, proprietorship, partnership, association, firm, or entity of any kind.
10. “Relating to,” “related to,” and “relate to” mean to be relevant in any way to the subject matter, including, without limitation, all information that directly or indirectly contains, records, reflects, summarizes, evaluates, refers to, is pertinent to, indicates, comments upon, or discusses the subject matter; or that states the background of, or was the basis for, or that records, evaluates, comments, was referred to, relied upon, utilized, generated, transmitted, or

received in arriving at any conclusion, opinion, estimate, position, decision, belief, policy, practice, course of business, course of conduct, procedure, or assertion concerning the subject matter.

11. “Solicitation” means any request or appeal, either oral or written, or any endeavor to obtain, seek or plead for funds, property, financial assistance or other thing of value, including the promise or grant of any money or property of any kind or value for a charitable purpose.
12. “Charitable Purpose” means any purpose which promotes, or purports to promote, directly or indirectly, the well-being of the public at large or any number of persons, whether such well-being is in general or limited to certain activities, endeavors or projects.

REQUESTS FOR INFORMATION AND DOCUMENTS

1. Identify all Persons responsible for providing Documents and information responsive to this Civil Investigative Demand. For each Person identified, Identify the specific requests to which each Person contributed Documents or information.
2. Produce all Documents that You identified, referred to, used to prepare, or that concern any of Your responses to any of these specific requests, to the extent that such Documents are not otherwise produced by any request contained herein directed to You.
3. If Documents or information responsive to a particular request have been lost or destroyed, state the circumstances under which the Documents or information were lost or destroyed, describe the lost or destroyed Documents or information to the fullest extent possible, state the specific demand to which they are responsive, and identify all Persons having knowledge of their content.
4. Identify all instances of Solicitation of any funds for any Charitable Purpose by You or any of Your affiliated chapters in Missouri.
5. For each instance of Solicitation that You identified in Your response to Request 4, Identify the date(s) of the Solicitation.
6. For each instance of Solicitation that You identified in Your response to Request 4, Identify the Persons involved in the Solicitation.
7. For each instance of Solicitation that You identified in Your response to Request 4, Identify the location of the Solicitation.

8. For each instance of Solicitation that You identified in Your response to Request 4, Identify how the funds, property, financial assistance or other thing of value were solicited.
9. For each instance of Solicitation that You identified in Your response to Request 4, Identify how the funds, property, financial assistance or other thing of value were collected.
10. For each instance of Solicitation that You identified in Your response to Request 4, Identify the nature and amount of funds, property, financial assistance or other thing of value collected.
11. For each instance of Solicitation that You identified in Your response to Request 4, Identify the recipients of any funds, property, financial assistance or other thing of value You collected from donors.
12. Produce any Documents and Communications containing, referencing, or including any statement, representation, or information on the recipients of solicited funds You collected in Missouri.
13. Produce any Documents and Communications relating to the nature and amount of funds, property, financial assistance or other thing of value each recipient of solicited funds You collected in Missouri received.
14. Produce any Documents or Communications necessary to allow ascertainment of the banking and financial information of the sending and receiving parties for funds collected through Your Solicitations in Missouri, the method of payment or funds transfer, and the Persons involved with the transfer or payment.
15. Produce all Documents or Communications relating to advertisements for any of Your Solicitations in Missouri.
16. To the extent not otherwise produced in response to any Request, produce any Documents or Communications (including, but not limited to, any internal emails, meeting minutes, notes, memoranda, or other internal communications) containing, referencing, or discussing any recipient of funds You collected through Solicitation in Missouri.
17. State whether You have a policy for vetting or investigating the recipients of funds collected through Solicitation. If You have such a policy, provide the policy, any Documents collected under that policy, and any Communications related to that policy or the implementation of that policy. This request

includes both any presently existing policy and any prior iterations of that policy or any other previously operative policy for investigating the recipients of funds collected through Solicitation, and any Communications relating to such earlier policy or the implementation of that policy.

CATHERINE L. HANAWAY

ATTORNEY GENERAL

/s/ Louis J. Capozzi III _____

Louis Capozzi, Mo. Bar. No. 77756

Solicitor General

Benjamin S. Gilberg, Mo. Bar. No. 78791

Deputy Solicitor General

Missouri Attorney General's Office

815 Olive Street, Suite 200

St. Louis, MO 63188

Louis.Capozzi@ago.mo.gov

Benjamin.Gilberg@ago.mo.gov

(573) 645-9662

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CID No. 26-190

NATIONAL STUDENTS FOR JUSTICE IN PALESTINE

September 23, 2026

CERTIFICATION OF COMPLIANCE

I certify that all documents and information required by Civil Investigative Demand No. 26-190, which is in the possession, custody, control, or knowledge of NATIONAL STUDENTS FOR JUSTICE IN PALESTINE, has been submitted to the Missouri Attorney General as directed.

Signature

Printed Name

Position

Date

State of Missouri)
)
County of _____)

On this day, _____ personally appeared before me, a notary public in Missouri. I know him to be the individual who signed this document, and he acknowledged to me that he signed it for the purposes stated in it.

Notary Public

Date