

NO. \_\_\_\_\_

ISLAMIC SOCIETY OF ARLINGTON,	*	IN THE DISTRICT COURT
TEXAS, ISLAMIC CENTER OF IRVING,	*	
DFW ISLAMIC EDUCATIONAL	*	
CENTER, INC., DAR ELSALAM	*	
ISLAMIC CENTER, AL HEDAYAH	*	
ISLAMIC CENTER, ISLAMIC	*	_____ JUDICIAL DISTRICT
ASSOCIATION OF TARRANT COUNTY	*	
	*	
VS.	*	
	*	
JOE KAUFMAN	*	TARRANT COUNTY, TEXAS

### PLAINTIFFS' ORIGINAL PETITION

#### Discovery Level

Discovery should proceed under Level 1.

#### Parties

This suit is brought by:	Names:	Islamic Society of Arlington, Texas Islamic Center of Irving DFW Islamic Educational Center, Inc. Dar Elsalam Islamic Center Al Hedaya Islamic Center Islamic Association of Tarrant County
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Defendant is:	Name:	Joe Kaufman
	Address:	1440 Coral Ridge Drive #404 Coral Springs, FL 33071

#### Service

Process should be served upon Defendant at the address set out above or at the entrance to Six Flags Over Texas amusement park, located at Arlington, Tarrant County, Texas.

#### Libel

Defendant operates a website on the internet called Americans Against Hate, with the web address of [www.americansagainsthate.org](http://www.americansagainsthate.org) . This website is in fact the antithesis of the title, in that it tries to foment hate and anger against law abiding United States citizens who practice

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their religion (Islam) freely as guaranteed by the United States Constitution.

Mr. Kaufman is as radical on the Israeli side of the international debate over Palestine as anyone is on the other side. He wishes to stir up anger, resentment, bias, and hatred of peaceful, law abiding citizens, solely because of their religion.

To this end, Defendant Kaufman organizes protests of all things Islamic, attempting to paint them in one broad swath as being allied with Hamas, Al Qaeda, and terrorists. However, he does not brand all Roman Catholics as IRA terrorists, all South Americans, as “shining path” terrorists, all Italian Americans as “Mafia”, only all Muslims.

To this end, Defendant has painted the Plaintiffs as terrorists.

Plaintiffs are the sponsors of an event at Six Flags Over Texas, an amusement park located in Arlington, Tarrant County, Texas being held this year on October 14, 2007. Defendant has used his web site to allege that Plaintiffs and all the members of their families are “radical Muslims” “Fanatic Muslim”s. He has scrawled JIHAD (in red that appears to be dripping blood) over a map of the state of Texas, centered of Arlington and Six Flags. He alleges in print that Plaintiffs are using the event to spread “anti-Western hatred.” He also alleges that Plaintiffs will have tables filled with “extremist propaganda”.

Plaintiffs are neither “radical” “extremists” “jihadist” (in the sense of that word as used in America to mean armed or violent people) “fanatics”.

In his delusional rantings, Defendant goes so far as to claim that a “Bugs Bunny and Friends” appearance is really an attempt to portray “Farfur” a character allegedly used by Hamas.

### **Intentional Infliction of Emotional Distress**

By his false statements and his attempts to cast Plaintiffs in a false light, Defendant has damaged Plaintiffs generally, and specially.

Defendant's statements are made against non-public figures, the families and members of Plaintiffs, and are made with gross and wanton disregard for the truth, and with malice, such as is likely to incite similarly ignorant persons to commit violence against Plaintiffs, their families and members.

Defendant should be held liable for exemplary damages for his egregious intentional infliction of emotional distress on Plaintiffs, their members, and their families.

### **Libel**

Plaintiffs allege all of the foregoing, and in addition, would show that Defendant is liable to Plaintiffs for general and special damages for the false malicious statements made about them in print on the internet.

### **Request for Temporary Restraining Order**

Plaintiff requests the Court to set a bond in a reasonable amount, and that upon the filing and approval of said bond, requests that Defendant be temporarily restrained immediately, without hearing, and upon notice and hearing be temporarily enjoined, pending the further order of this Court, from:

Intentionally communicating with Plaintiffs in person, by telephone, or in writing in vulgar, profane, obscene, or indecent language, or in a coarse or offensive manner, with intent to annoy or alarm Plaintiffs.

Threatening Plaintiffs in person, by telephone, or in writing to take unlawful action against any person, intending by this action to annoy or alarm Plaintiff.

Placing one or more telephone calls, anonymously, at any unreasonable hour, in an offensive and repetitious manner, or without a legitimate purpose of communication and with the intent to annoy or alarm Plaintiffs.

Intentionally, knowingly, or recklessly causing bodily injury to Plaintiffs or Plaintiff's associates or members.

Threatening Plaintiffs or Plaintiffs' associates or members with imminent bodily injury.

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## **Request for Temporary Injunction**

Plaintiff requests the Court, after notice and hearing, to issue a temporary injunction as deemed necessary and equitable.

### **Prayer**

Plaintiffs pray that citation and notice issue as required by law and that the Court grant judgment for damages, for injunctive relief and such other relief requested in this petition.

Plaintiffs pray that the Court immediately grant a temporary restraining order restraining Defendant, in conformity with the allegations of this petition, from the acts set forth herein, and Plaintiffs pray that, upon notice and hearing, this temporary restraining order be made a temporary injunction.

Plaintiffs pray for judgment for damages, such prejudgment and post judgment interest as may be allowed by law, and costs of court.

Plaintiffs pray for general relief.

Respectfully submitted,

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State Bar Number 07539400  
Attorney for Plaintiffs

STATEMENT ON ALTERNATIVE DISPUTE RESOLUTION

PLAINTIFF'S ORIGINAL PETITION

"I AM AWARE THAT IT IS THE POLICY OF THE STATE OF TEXAS TO PROMOTE THE AMICABLE AND NONJUDICIAL SETTLEMENT OF DISPUTES INVOLVING CHILDREN AND FAMILIES. I AM AWARE OF ALTERNATIVE DISPUTE RESOLUTION METHODS, INCLUDING MEDIATION. WHILE I RECOGNIZE THAT ALTERNATIVE DISPUTE RESOLUTION IS AN ALTERNATIVE TO AND NOT A SUBSTITUTE FOR A TRIAL AND THAT THIS CASE MAY BE TRIED IF IT IS NOT SETTLED, I REPRESENT TO THE COURT THAT I WILL ATTEMPT IN GOOD FAITH TO RESOLVE BEFORE FINAL TRIAL CONTESTED ISSUES IN THIS CASE BY ALTERNATIVE DISPUTE RESOLUTION WITHOUT THE NECESSITY OF COURT INTERVENTION."

SIGNED ON \_\_\_\_\_, 2000.

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