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**IN THE COURT OF COMMON PLEAS
HAMILTON COUNTY, OHIO**

<p>STATE OF OHIO, <i>ex rel.</i> DAVE YOST, OHIO ATTORNEY GENERAL Charitable Law Section 30 East Broad Street, 25th Floor Columbus, Ohio 43215,</p> <p align="center">Plaintiff,</p> <p align="center">v.</p> <p>HEBREW UNION COLLEGE–JEWISH INSTITUTE OF RELIGION 3101 Clifton Avenue Cincinnati, Ohio 45220</p> <p align="center">Defendant.</p>	<p>Case No.: A2402430</p> <p>Judge Leah Dinkelacker</p> <div align="center">  D146168661 </div> <p>AGREED FINAL ORDER AND JUDGMENT ENTRY</p>
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ENTERED
OCT - 3 2025

This matter came before the Court for non-oral hearing on a proposed Agreed Final Order and Judgment Entry. The case was initiated when Plaintiff the State of Ohio, *ex rel.* Dave Yost, Ohio Attorney General (the “State”) filed a Complaint on June 3, 2024, seeking a permanent injunction, equitable relief, and other available relief against Hebrew Union College-Jewish Institute of Religion (the “College” or “Defendant”). Defendant filed an Answer to the Complaint. The College denies both liability and the validity of the State’s claims.

The parties have agreed to settle and resolve the State’s claims against the College in this case. The College enters into this agreement in order to avoid the cost and distraction of protracted litigation. By signing this Agreed Final Order and Judgment Entry (“Judgment”), Defendant knowingly and voluntarily consents and agrees to the terms and entry of this Judgment.

FINDINGS OF FACT

1. Defendant is an Ohio nonprofit corporation with IRS 501(c)(3) tax-exempt status.

2. Defendant is the religious seminary for the Reform Jewish Movement in North America and an institution of Jewish higher education.

3. Defendant, as part of its religious mission and program, owns, operates, and controls the collections contained in its libraries and housed primarily at 3101 Clifton Avenue in Cincinnati, Ohio (the "Cincinnati Klau Library"). The Cincinnati Klau Library is part of the Hebrew Union College Library system which also includes the Klau Library in New York, the Frances-Henry Library in Los Angeles, and the Abramov Library in Jerusalem (collectively, the "Libraries").

4. The Cincinnati Klau Library provides access to the College's collections in support of the teaching functions of the College's various religious and educational programs as well as meets the research needs of the College's faculty, students, and staff, the residents of the Cincinnati metropolitan area, and also the Judaic academic and general community both in the United States and abroad.

5. The Libraries, and in particular the Cincinnati Klau Library, hold Special Collections that comprise a renowned Judaica research collection which is made available to researchers and historians worldwide.

6. The Special Collections of the Libraries include the Rare Book and Manuscript Collection, which includes rare incunabula, manuscripts, Biblical codices, communal records, legal documents, and scientific tracts.

CONCLUSIONS OF LAW

7. This Court has jurisdiction over the subject matter of this action.

8. The Court has personal jurisdiction over Defendant.

9. The Court is a proper venue for this action.

10. Defendant is a “charitable trust” within the meaning of Ohio Revised Code Section 109.23 et seq. (“Ohio Charitable Trust Act”), and is a “charitable organization” within the meaning of Ohio Revised Code Chapter 1716 (“Ohio Charitable Organizations Act”).

11. The Cincinnati Klau Library is part of the College and the assets and collections contained in the Cincinnati Klau Library have been acquired and preserved for the charitable, academic and religious purpose of providing access to the collections in support of the teaching functions of the College’s various religious and educational programs as well as meeting the research needs of the College’s faculty, students, and staff, the residents of the Cincinnati metropolitan area, and also the Judaic academic and general community both in the United States and abroad.

FINAL ORDER AND JUDGMENT

THEREFORE, IT IS ORDERED as follows:

A. Defendant has adopted a Collection Management Policy consistent with the American Library Association (“ALA”) recommendations for Collection Management and Weeding that governs the weeding and/or deaccession of items from the Libraries, including the Cincinnati Klau Library (hereafter, the “Policy”). Defendant will maintain a collection management policy consistent with the ALA recommendations for Collection Management and Weeding.

B. As an academic religious institution whose mission requires access to scholarship well beyond its own holdings, in compliance with the terms of the Policy, Defendant and its directors, officers, agents, servants, employees, attorneys and those persons in active concert or participation with them may engage in routine transfers of its collections between each of its four Libraries to serve its academic and religious mission as well as engage in routine interlibrary

loans to any participating library outside of the HUC system. In addition, Defendant may loan any Library item, including from the Special Collections and the Rare Book and Manuscript Collection, to any of its four Libraries as well as to other institutions in support of their exhibits and scholarly research, taking appropriate care for the protection, insurance, and return of such items.

C. Nothing in this Judgment shall be construed to modify or remove donor restrictions on specific items within the collections, including (without limitation) as to use or location of an item.

D. The College agrees to provide to the Attorney General a list of all items in the Special Collections and the Rare Book and Manuscript Collection (the "List") and will identify any items on the List that contain a condition or restriction from the donor as to the sale, transfer, removal from Ohio, disposal of or deaccession of the item (the "Donor Restricted List").

E. Except as to those loans identified in Paragraph B above, in compliance with the terms of the Policy and any applicable state rule or statute, Defendant and its directors, officers, agents, servants, employees, attorneys and those persons in active concert or participation with them may only sell, transfer, remove from Ohio, dispose of, or otherwise deaccession any item on the List or the Donor Restricted List after providing at least forty-five (45) days advance written notice to the Attorney General of its intent to sell, transfer, remove from Ohio, dispose of, or otherwise deaccession one or more items.

F. In addition to all other terms of this Judgment, all funds received from the deaccession of items from Library collections, net of selling costs, shall only be used for obtaining other items for Library collections. Funds received from the deaccessioned items shall not be used for operations or capital expenses, absent a declaration of acute financial need as

determined by a two-thirds majority vote of the Board of Governors and thirty (30) days advance written notice to the Attorney General.

G. Defendant and its directors, officers, agents, servants, employees, attorneys and those persons in active concert or participation with them shall preserve all records related to the acquisition, maintenance, relocation, preservation, deaccession, sale, or transfer of any items in the Special Collections and Rare Book and Manuscript Collection in the Cincinnati Klau Library for a period of at least seven (7) years.

H. When required under this Judgment, notice to the Attorney General shall be sent by certified mail, return receipt requested, to attention of the Section Chief at the then available address of the Charitable Law Section of the Ohio Attorney General's Office or, if there is no such address, to the general address of the Ohio Attorney General to the attention of the Charitable Law Section Chief.

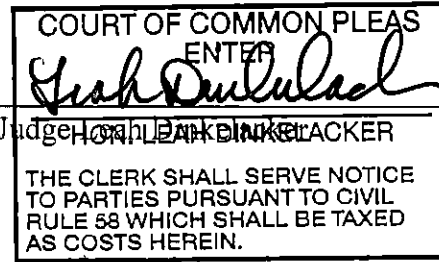
I. It is agreed by the parties and ordered by the Court that this Judgment shall resolve only the Complaint in this action and shall not bar, preclude, estop, or otherwise prevent either party from asserting any other allegation, claim, or defense regarding the College or the Attorney General's authority with respect to the College.

J. The terms of this Agreed Final Order and Judgment Entry shall expire seven (7) years after the date of the filing of the Judgment Entry.

K. Each party shall bear its own costs, expenses, and fees, including legal fees. Defendant shall pay court costs, if any.

IT IS FURTHER ORDERED that this Court shall retain jurisdiction of this matter for all purposes.

Date: October 3, 2025



Agreed,
DAVE YOST
ATTORNEY GENERAL OF OHIO

Agreed,
HEBREW UNION COLLEGE-JEWISH
INSTITUTE OF RELIGION
Per email September 29, 2025

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