

STATE OF NEW YORK
SUPREME COURT : COUNTY OF ALBANY

ROWLAND A. RUPP
127 Kandahar Drive
East Aurora, NY 14052

Plaintiff,

vs.

Index No.:

ANTHONY P. FARLEY
206 North Pearl Street, Apt. 204
Albany, New York 12207

Defendant.

SUMMONS

TO DEFENDANT: ANTHONY P. FARLEY

YOU ARE SUMMONED to appear in this action by serving your answer to the complaint on the plaintiff's attorney within the time limits stated below.

Albany County is designated as the county where this action will be tried, because one or more of the parties to this action has a principal place of business in that county.

TIME LIMITS TO ANSWER:

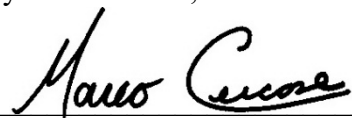
(1) If this summons is served by delivery to you personally within New York State, you must answer the complaint within TWENTY (20) days after such delivery.

(2) If this summons is not served by delivery to you personally within New York State, and not served pursuant to CPLR 312-a, you must answer the complaint within THIRTY (30) days after service is complete.

IF YOU FAIL TO ANSWER THE COMPLAINT within the time stated,
judgment will be entered against you for the relief demanded in the complaint.

Dated: December 15, 2025
Buffalo, New York

RUPP PFALZGRAF LLC
Attorneys for Plaintiff, Rowland A. Rupp

By: 

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STATE OF NEW YORK
SUPREME COURT : COUNTY OF ALBANY

ROWLAND A. RUPP,

Plaintiff,

vs.

Index No.:

ANTHONY P FARLEY,

Defendant.

VERIFIED COMPLAINT

Plaintiff Rowland A. Rupp by way of his complaint against Defendant Anthony P. Farley, alleges as follows:

PARTIES

1. Plaintiff Rowland A. Rupp is an adult individual residing in Erie County, New York.
2. At all relevant times, Plaintiff was and is a law student in good academic and disciplinary standing at Albany Law School with an anticipated graduation date of May, 2026.
3. Defendant Anthony Paul Farley is an adult individual residing in Albany County, New York.
4. At all relevant times, Defendant was employed as a tenured professor at Albany Law School.

JURISDICTION AND VENUE

5. This Court has jurisdiction pursuant to CPLR 301.

6. Venue is proper in Albany County under CPLR 503 because Defendant resides in Albany County and the causes of action arose in this County.

PRELIMINARY STATEMENT

7. This action arises from Defendant's publication of numerous false and defamatory statements accusing Plaintiff of violent, racist, dangerous, and mentally unstable conduct.

8. Defendant claimed, among other things, that Plaintiff committed a "racist assault," that Plaintiff had "assaulted" Defendant's person, that Plaintiff might be a "school shooter," and that Plaintiff was "mentally unwell" and suffering from "illnesses in his head."

9. Defendant made these false statements maliciously and knowingly, and he did so in direct retaliation for Plaintiff's complaint about Defendant's inappropriate, unprofessional, discriminatory, and inflammatory conduct in the classroom. Defendant's sudden escalation of benign events into accusations of racist violence and dangerousness occurred only after he learned that Plaintiff had reported his unprofessional and demeaning classroom behavior to school administration.

10. Defendant's retaliatory conduct was entirely consistent with his longstanding pattern at Albany Law School—well known to colleagues, deans, administrators, and members of the Board of Trustees—of responding to criticism or challenge with hostility, exaggeration, allegations of racism, and personal attack. For years, Defendant had reacted to complaints or disagreements by deflecting responsibility and fabricating narratives casting himself as the victim and others as racist, and his defamatory statements about Plaintiff were a continuation of this established and widely recognized pattern.

11. In furtherance of his retaliatory plan, Defendant made false and defamatory statements about Plaintiff to students, faculty, administrators, a student organization,

and thousands of third parties online, causing severe harm to Plaintiff's reputation, emotional well-being, and professional prospects.

**DEFENDANT'S HISTORY OF HOSTILITY, ESCALATION, AND
RETALIATORY RACIAL ACCUSATIONS**

12. For years prior to the events involving Plaintiff, Defendant had a reputation at Albany Law School for responding to disagreement or criticism with hostility, escalation, invective, and personal attacks rather than professional engagement.

13. Defendant's confrontations with colleagues, administrators, and others often escalated into loud, public tirades that quickly became personal and accusatory, going far beyond the subject matter at hand.

14. A recurring pattern in Defendant's outbursts was his habit of accusing anyone who disagreed with him or attempted to correct him of racism, even when the issue at hand was entirely unrelated to race.

15. Defendant frequently inverted his own racist behavior, claiming that he was the victim of racism whenever colleagues challenged his unprofessional antics or disagreed with his provocative and racially charged views.

16. Defendant's repeated use of racial accusations in ordinary faculty interactions created an atmosphere of intimidation, fear, and discomfort among faculty members and administrators that has pervaded Albany Law School for many years.

17. Defendant's frequent tirades, intemperate personal attacks, and false allegations of racism have caused fellow faculty members to take medical leaves of absence and even leave their positions at Albany Law School.

18. In late 2023, during a faculty meeting attended by professors and deans, Defendant engaged in an unhinged, racially charged attack on another professor after that professor, serving as faculty parliamentarian, attempted to stop Defendant from repeatedly departing from the meeting's agenda and usurping the conversation.

19. During and again at the end of that meeting, Defendant loudly and repeatedly accused the colleague of racism, berated her in front of the assembled faculty and deans, and refused to stop until she left the meeting. That professor then took medical leave and ultimately resigned her position due to the Defendant's conduct.

20. This incident shocked many faculty members but was only one example of how Defendant's use of racial rhetoric and personal attacks had destabilized faculty interactions.

21. The severity of this episode and related concerns led Albany Law School in early 2024 to convene a special Faculty Listening Committee to investigate ongoing hostility, breakdowns in professionalism, and abusive interactions among faculty.

22. The Faculty Listening Committee interviewed faculty and staff, documented recurring problems, and retained external consultants to help assess the faculty environment and professional climate.

23. Upon information and belief, the consultants eventually produced a written report detailing, among other issues, Defendant's unprofessional behavior, confrontational episodes, and repeated use of racially charged accusations to attack colleagues during disagreements.

24. Defendant knew that this written report circulated among senior administrators and that his unprofessional conduct had been formally documented.

25. Defendant also understood that further complaints about his conduct could revive or intensify administrative scrutiny or lead to disciplinary and professional consequences for him.

26. Defendant therefore had a powerful personal motive to distort any later incident involving him, to shift blame onto others, and to preemptively discredit anyone who challenged him, especially a student. Defendant's defamatory statements about Plaintiff must be understood against this longstanding pattern of retaliatory escalation and false accusations.

THE JANUARY 13, 2025 CLASSROOM INCIDENT

27. On January 13, 2025, Plaintiff attended the first session of Defendant's International Child Rights course in Classroom E117.

28. During the first thirty minutes of class, after deliberately and conspicuously deactivating the classroom's audio recording device, Defendant launched into an extended ideological tirade in which he denounced the United States, the Founding Fathers, conservatives, white people, hunters, and others whom he associated with Plaintiff.

29. Defendant declared to the class that the only "real" 9/11 was not the 2001 terrorist attacks on the World Trade Center and the Pentagon but the 1973 overthrow of Chile by the CIA, thereby dismissing the deaths of thousands of Americans as unworthy of attention.

30. Defendant further asserted that the Founding Fathers "were worse than Hitler," equating the leaders of the American Revolution with one of history's most reviled mass murderers.

31. Defendant continued by telling the class that conservatives "hate Blacks, women, and gays," a sweeping and racially charged claim that reduced millions of Americans to bigots based solely on their political identity and implicitly cast Plaintiff—a white male whom Defendant apparently associated with conservatives—as hateful and prejudiced.

32. Defendant also stated that conservatives—and by extension Plaintiff—"want to conserve slavery," accusing them of supporting one of the most abhorrent institutions in American history.

33. Defendant mocked the appearance and identity of conservatives as "Daniel Boone types," using dog-whistle imagery of frontier-era whiteness and ruggedness while glaring toward Plaintiff and apparently connecting Plaintiff's attire to this racial stereotype.

34. Defendant then singled out Plaintiff for specific derision, mocking him and remarking in front of the class, "Of course the guy with the hat hunts," and repeatedly connecting Plaintiff's appearance to Defendant's negative and racially charged stereotypes about conservatives.

35. Defendant's comments were unprofessional, discriminatory, ideological, and inappropriate for the classroom setting.

36. Plaintiff became uncomfortable, offended, and embarrassed by Defendant's comments, especially those that were directed at him personally and that mocked his attire and the color of his skin.

37. After approximately thirty minutes, Plaintiff packed his belongings with the intention of leaving the class and withdrawing from the course.

38. Plaintiff walked to the front of the classroom where Defendant was seated, placed his hand on Defendant's shoulder in a non-threatening manner, and stated in sum or substance, "Thank you for the last thirty minutes. I hope you have a good semester. You won't be seeing me again."

39. Plaintiff then calmly exited the classroom and immediately proceeded to the administrative offices to report Defendant's unprofessional and racially discriminatory classroom behavior to Albany Law School deans.

DEFENDANT'S INITIAL REPORTS OF THE INCIDENT

40. Immediately after class, and before having any knowledge that Plaintiff had lodged a complaint about his unprofessional conduct, Defendant emailed a school administrator stating only Plaintiff "was disruptive" and requesting that Plaintiff be removed from the class and email list.

41. In his initial report of the incident, Defendant did not claim that Plaintiff assaulted him, nor did Defendant state or suggest that Plaintiff's conduct was racist.

42. In his initial report of the incident, Defendant did not assert that Plaintiff was dangerous, unstable, a potential school shooter, mentally unwell, or threatening in any way.

43. Later that same day, January 13, 2025, Defendant described the event publicly on his Facebook page, as follows:

<  **Anthony Farley**
Jan 13 · 👤

Although I've been a professor for most of my life, today was my very first encounter with a disruptive student. The disrupter theatrically packed his things and stormed out mid-class. He had that incel / MAGA look about him, with his maybe one size too small Daniel Boone clothes and his "Remember the Alamo!" hat, so maybe, in addition to racism, there are other illnesses in his head, idk. There's a first time for everything! Here's a picture of me from a recent trip to the UN Peace University in San José, Costa Rica:



 Write a comment...  

44. In his Facebook description of events, before he learned of Plaintiff's complaint against him, Defendant, while continuing to use racial dog-whistle terminology to mock Plaintiff's attire and appearance, described Plaintiff's departure in non-violent terms, stating only that "[t]he disrupter theatrically packed his things and stormed out mid-class."

45. Although the Defendant's Facebook post now contained ad hominem allegations of racism and mental unwellness to go along with insulting rhetoric about Plaintiff's appearance, Defendant made no mention of an assault on his person and no suggestion of violence, danger, or threatening conduct by Plaintiff.

46. In another post later that same day, Defendant wrote: “When I called the registrar to drop him from my class, she told me he’d already dropped, so all is well that ends well.” Once again, Defendant made no mention of any assault, but at the time of his post, he did not know of the complaint Plaintiff had lodged against him for his unprofessional and racially discriminatory classroom conduct.

47. In yet another post on the same day, Defendant wrote: “No, he’s not in my class anymore. A few minutes after class ended, I emailed the registrar to drop him from the roster. Turns out he’d actually already dropped – so the whole thing may well have been a Trumpist performance of some sort, who knows?”

48. Yet again, Defendant made no mention of any assault, but once again, at the time of his post, he did not know of the complaint Plaintiff had lodged against him for his unprofessional and racially discriminatory classroom conduct.

DEFENDANT LEARNS OF PLAINTIFF’S COMPLAINT AND CHANGES HIS STORY

49. The following day, Defendant learned that Plaintiff had filed a complaint with administration concerning Defendant’s unprofessional, discriminatory, and demeaning classroom behavior.

50. Given his history of inflammatory rhetoric and inappropriate classroom behavior, as well as the work and findings of the Faculty Listening Committee, Defendant saw Plaintiff’s complaint as a threat to his standing and stature at Albany law School.

51. Thereafter, Defendant embarked on a deliberate, retaliatory, and malicious campaign to defame Plaintiff to undermine the merit of Plaintiff’s complaint against him.

52. Only after learning of Plaintiff’s complaint did Defendant radically alter his account of the incident and, for the first time, describe Plaintiff’s conduct as an “assault.”

53. These newly asserted allegations of an “assault” on his person were deliberately false, malicious, and directly contradicted Defendant’s own contemporaneous descriptions of the event.

54. Defendant fabricated these assault accusations with actual malice in retaliation for Plaintiff's complaint and to protect his own reputation at Albany Law School by portraying Plaintiff—not Defendant—as the wrongdoer.

**DEFENDANT'S RETALIATORY DISCIPLINARY COMPLAINT AND
WEAPONIZATION OF THE PROCESS**

55. Using his new fabricated and sensationalized account, Defendant proceeded to file his own disciplinary complaint against Plaintiff, doing so only after learning that Plaintiff had already reported Defendant's unprofessional classroom behavior to Albany Law School administration.

56. In his retaliatory complaint, Defendant repeated and embellished the false allegations he had newly invented—accusing Plaintiff of a “racist assault,” claiming Plaintiff had “assaulted” him personally, and depicting a benign classroom departure as an act of hostility, aggression, and danger, and representative of mental unwellness.

57. Defendant's aim in filing this retaliatory charge was to get ahead of Plaintiff's complaint by reframing himself as the victim and transforming a student grievance regarding Defendant's own unprofessional classroom behavior into a disciplinary matter targeting Plaintiff.

58. Defendant's retaliatory filing further demonstrates his malice, his intent to distort the record, and his longstanding pattern of escalating conflicts by fabricating narratives that deflect scrutiny from his own misconduct and cast blame on those who challenge him.

59. Immediately after filing his retaliatory complaint, Defendant set out to weaponize, control, and steer what was supposed to be a confidential disciplinary process by injecting himself into it and seeking to influence its outcome through improper channels.

60. Defendant began communicating about the matter and publicizing his defamatory account to individuals who had no role in the formal disciplinary process, including Albany Law School administrators and a student group—the Black Law Students Association—

whose involvement was neither authorized nor appropriate under Albany Law School's confidential disciplinary procedures.

61. Defendant publicized his false and embellished allegations to members of this student group, presenting his fabricated narrative in a manner designed to rally support for himself, generate hostility toward Plaintiff, and create external pressure on the administration regarding how the disciplinary matter should be handled.

62. By enlisting the aid of a student organization and broadcasting his false accusations outside official channels, Defendant deliberately further published his defamatory and malicious statements, thereby ensuring that his fabricated narrative of "assault," "racist assault," and dangerousness would spread beyond the disciplinary process.

63. Defendant's purpose in doing so was not to provide information, but to defame Plaintiff, poison the perceptions of students and administrators, and engineer an atmosphere of hostility toward Plaintiff that would influence and distort the outcome of the disciplinary proceeding.

SPECIFIC DEFAMATORY STATEMENTS

64. On or about January 13, 2025, Defendant posted publicly to approximately 6,500 Facebook followers a description of the incident clearly referring to Plaintiff.

65. Defendant wrote that Plaintiff had an "incel / MAGA look."

66. Defendant wrote that Plaintiff wore "Daniel Boone clothes."

67. Defendant wrote that "maybe in addition to racism there are other illnesses in his head."

68. Defendant also told students, "I wouldn't be surprised if he was a school shooter."

69. These statements falsely implied Plaintiff was violent and capable of mass murder and falsely portrayed Plaintiff as racist, extremist, and mentally unstable.

70. Defendant wrote that Plaintiff's conduct "may well have been a Trumpist performance of some sort."

71. This statement implied that Plaintiff had staged a politically motivated and dangerous act by departing Defendant's classroom.

72. These statements were made before any disciplinary complaint was commenced against Plaintiff and before Defendant knew that a formal complaint had been lodged against him.

73. Defendant later stated that Plaintiff had committed "an assault on my person."

74. Defendant further alleged that Plaintiff committed a "racist assault."

75. Defendant knew that these statements were false.

76. Defendant made these claims to denigrate the Plaintiff's character and influence the investigation and deceive the investigators.

77. Defendant wrote to another administrator asking whether Plaintiff was "mentally unwell."

78. Defendant asked whether Plaintiff was "dangerous."

79. Defendant asked whether there had been "other incidents," adding, "it seems entirely likely."

80. These statements and questions falsely implied Plaintiff was unstable, dangerous, and had committed other "assaults."

81. On December 7, 2025, Defendant made a "belated agenda item request" to discuss "student violence against faculty" at an Albany law School faculty meeting scheduled for December 9, 2025.

82. At the December 9, 2025 meeting before Albany Law School faculty and deans, Defendant once again berated his colleagues and administrators and gaslit them by falsely declaring that he had been “assaulted” by Plaintiff during the incident of January 13, 2025.

83. Defendant identified Plaintiff as the student who had allegedly “assaulted” him and used the word “assault” in one form or another at least six times.

84. Defendant made these allegations of assault to denigrate the Plaintiff and his character before professors and administrators at Albany Law School.

FALSITY AND MALICE

85. All of Defendant’s statements describing Plaintiff as violent, racist, dangerous, mentally unstable, and having committed an “assault,” a “racist assault,” or an assault on his person, or otherwise suggesting that Plaintiff was violent or posed a threat were false, and none of these accusations bore any relationship to what actually occurred during the January 13, 2025 class session.

86. Plaintiff did not assault Defendant in any manner; the brief tap on Defendant’s shoulder was non-threatening, polite in tone, and consistent with Plaintiff’s polite farewell, in the nature of a handshake, and no reasonable observer could interpret it as an act of assault or violence.

87. Plaintiff did not engage in any racist behavior whatsoever, and neither the words he spoke upon departing the classroom nor the departure itself involved race, racial language, or conduct that could reasonably be characterized as racially motivated despite the racial animosity that Defendant had directed at him.

88. Plaintiff is not mentally unstable, dangerous, or prone to violence, and Defendant’s attempts to portray him as such were unfounded, reckless, and intended to damage Plaintiff’s professional reputation and personal dignity.

89. Defendant acted with actual malice, which is demonstrated by his knowledge of the true events, the contrast between his contemporaneous account and his later

accusations, and his intentional exaggeration of benign conduct into claims of violent and racist assault.

90. Defendant knew precisely what had occurred because he personally witnessed the incident from a seated position near Plaintiff and immediately described the event merely as “disruptive” and declaring “all is well that ends well” before later fabricating new details.

91. Defendant changed his story only after learning that Plaintiff had filed a complaint against him with school administration, at which point Defendant transformed a mundane and nonviolent encounter into a narrative of assault, racism, and danger.

92. Defendant acted with retaliatory purpose, fabricating allegations to suppress Plaintiff’s complaint, deflect blame from his own unprofessional and discriminatory conduct, and protect himself from renewed administrative scrutiny at Albany Law School following the work of the Faculty Listening Committee.

93. Defendant’s conduct in this instance was entirely consistent with his longstanding pattern of retaliatory escalation, exaggeration, and self-protective fabrication when challenged, criticized, or confronted with the possibility of institutional consequences for his behavior.

DAMAGES

94. Defendant’s statements constitute defamation per se because they falsely imputed to Plaintiff serious criminal conduct, including assault and the propensity for extreme violence, and attributed to him racist motivations and mental instability—categories of accusation that, under New York law, inherently damage a person’s reputation without the need for proof of special damages.

95. As a direct and foreseeable result of Defendant’s publications, Plaintiff suffered severe reputational harm within the Albany Law School community, among faculty, administrators, and fellow students, many of whom believed or reacted to Defendant’s belated and fabricated accusations of assault, racism, and violence, mental instability, and potential dangerousness, thereby undermining Plaintiff’s standing in the institution.

96. Plaintiff suffered humiliation, emotional anguish, and distress after being portrayed publicly and repeatedly as violent, racist, mentally unstable, and potentially homicidal, and the widespread dissemination of these accusations—including to thousands of individuals on social media—caused Plaintiff to experience ongoing fear, anxiety, embarrassment, and social isolation.

97. Defendant’s defamatory statements harmed Plaintiff’s academic standing and professional prospects, as law students must maintain reputations for honesty, stability, and ethical conduct to secure internships, clerkships, employment opportunities, and admission to the bar, all of which were jeopardized by Defendant’s false allegations suggesting that Plaintiff was unfit for professional responsibility or safe participation in an academic environment.

FIRST CAUSE OF ACTION — DEFAMATION PER SE

98. Plaintiff repeats and realleges the allegations set forth above as though fully restated herein, as they provide the factual foundation for this cause of action and demonstrate the malicious and defamatory nature of Defendant’s conduct.

99. Defendant published statements, both orally and in writing, accusing Plaintiff of committing an assault and characterizing the incident as a “racist assault,” thereby falsely imputing to Plaintiff serious criminal conduct and racial animus—allegations that are inherently defamatory and damaging under New York law.

100. Defendant further published statements implying that Plaintiff might be a “school shooter,” a term that connotes extreme, homicidal violence and aligns the accused with individuals who commit mass murder, causing immediate and profound reputational harm.

101. Defendant additionally published statements portraying Plaintiff as mentally unstable, emotionally disturbed, or exhibiting behavior that suggested he was dangerous or unfit to be around others, all of which were unfounded and intended to stigmatize Plaintiff’s character and undermine his credibility.

102. These statements were false when made, and Defendant published them with actual malice, knowing the true circumstances of the incident and knowingly fabricating or

embellishing details to retaliate against Plaintiff and divert attention from Defendant's own misconduct.

103. As a direct and proximate result of Defendant's defamatory statements, Plaintiff suffered damages including reputational injury, emotional distress, social stigma, academic harm, and impairment of future professional and educational opportunities.

SECOND CAUSE OF ACTION — DEFAMATION BY IMPLICATION

104. Plaintiff repeats and realleges all preceding allegations as though fully set forth herein, as they demonstrate the factual and contextual basis for Defendant's liability for defamation by implication.

105. Defendant's questions, insinuations, rhetorical framing, and selective recitation of events were crafted to create and convey false impressions about Plaintiff's conduct and character, including the false notions that Plaintiff was mentally unstable, dangerous, violent, racist, or involved in prior incidents of misconduct.

106. Defendant intended that these defamatory implications be drawn by those who received his communications, as evidenced by the calculated timing of his statements, the escalation of accusations after learning of Plaintiff's complaint, and Defendant's longstanding pattern of using implication and insinuation to attack those who challenge him.

107. The defamatory implications conveyed through Defendant's statements were false, not rooted in any observed facts, and designed to mislead recipients into believing that Plaintiff posed a threat or had engaged in serious wrongdoing, thereby rendering the statements actionable under New York law.

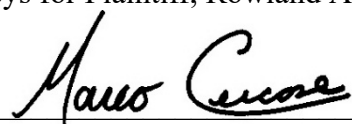
108. As a direct and proximate result of Defendant's defamatory implications, Plaintiff suffered damages including reputational harm, emotional distress, humiliation, damage to academic standing, and impairment of future professional prospects.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff demands compensatory damages presumed by law as a result of Defendant's defamation per se, punitive damages for Defendant's willful and malicious conduct, costs and disbursements of this action, and such other and further relief as the Court deems just and proper.

Dated: December 15, 2025
Buffalo, New York

RUPP PFALZGRAF LLC
Attorneys for Plaintiff, Rowland A. Rupp

By: 
Marco Cercone
1600 Liberty Building
424 Main Street
Buffalo, New York 14202
(716) 854-3400

VERIFICATION

STATE OF NEW YORK)
 : ss.:
COUNTY OF ERIE)

I am the plaintiff in the above action. I have read the foregoing summons and verified complaint and know its contents. The document is true to my own knowledge, except as to matters stated to be on information and belief, and as to those matters, I believe them to be true.

I affirm this 15th day of December, 2025, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.



Rowland A. Rupp