

TO:

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VIA EMAIL

April 9, 2024

**Administrative Complaints Against Queens College, City University of New York
Under Title VI of the Civil Rights Act of 1964.**

I. Introduction

These Complaints are filed with the U.S. Department of Education Office of Civil Rights (“OCR”) against Queens College, City University of New York (“Queens College”) on behalf of the [redacted]

[redacted] (b)(6); (b)(7)(A); (b)(7)(C) due to the direct discrimination and hostile environment that the mentioned victims and all who are or are perceived to be Palestinian, Arab, South Asian and/or Muslim, have been subjected to on the basis of their actual or perceived race, color, religion, and national origin.

Although the Complaints list specific instances of discrimination, the problems that are the subject of the Complaint are systemic and require system-wide investigation and remedy.

The Complainant requests that OCR not share the identity of the individual students and organizations that appear in this complaint with the Queens College administration, as they fear repercussions from the administration based on the harm described in this complaint.

II. Statement of Jurisdiction

Queens College is a public college in the State of New York. As a public entity that receives federal funding from the U.S. Department of Education, Queens College is subject to all laws and regulations enforced by OCR. This complaint is timely because discriminatory acts, harassment, and hostile environment occurred within the last 180 days. Further, the adverse disparate impact of the policies and practices are ongoing.

III. Other Filings

Complainants have not sought relief for these claims from any other federal agency.

IV. Basis for the Complaints

The basis for these Complaints is discrimination based on actual and perceived race, ethnicity, religion, and national origin of the students as well as viewpoint discrimination. Queens College maintains an environment that is hostile to students who are Muslim, Palestinian, Arab, South Asian, associated with such, or perceived as such based on their skin tone, facial features, wearing a hijab, wearing a keffiyeh, or Arabic names.

Queens College also censors speech based on its expressed solidarity with the Palestinian people while permitting similar speech on the same topic with a different viewpoint.

V. Harm

The attached complaints detail incidents that have created a hostile, discriminatory environment for Palestinian, Arab, South Asian, and/or Muslim students, including members of (b)(6); (b)(7)(A) as well as students who were perceived to have these identities based on their donning of keffiyehs, skin tone, and facial features often associated with these identities. These students, who already suffer from the mental distress of witnessing a genocide of the Palestinian people, face additional anxiety about attending class and are unable to pay attention due to the hostile environment created by Queens College.

In a broader context of rising hostility and violence towards Palestinians and Muslims, these students feel targeted by the administration for their actual or perceived identities. (b)(6); (b)(7)(A); (b)(7)(C) at Queens College, states:

“As a student at [Queens College] I feel really separated from my peers. When I walk into class I immediately feel and even see the stares from multiple classmates just because (b)(6); (b)(7)(A); (b)(7)(C) It isn’t even just walking into classes but the overall experience of walking on to campus, walking on the quad, to the library - you can immediately see people staring at you. As a (b)(6); walking into a hostile environment isn’t the experience I expected. If anything, this dissuades me from wanting to be in a space with people who I feel aren’t my allies.”

A Queens College faculty member also stated the following:

“Students I have taught at Queens college in the past have been nothing but respectful, considerate, and generous. Rarely did I have students complain to me about their peers or

their safety on campus, and if they did, it was usually something with a quick resolution, like another student slacking off on a group project.

However, beginning last semester, things have shifted. I have had several students come to me during office hours to tell me that they feel unsafe on campus, and even if they do not feel unsafe in my classroom, they do more generally around QC. I do not think that it is a coincidence that all the students who have come to address this with me have been ^{(b)(6)} ~~1,2,3,4,5,6,7,8,9~~ students. At least one of them had a breakdown in my office, leading me to encourage them to contact counseling services as soon as possible. It was devastating and heartbreak to witness a student I cared so deeply about go through this. And I felt utterly helpless."

VI. Requested Remedies

Based on the following, the Complainant respectfully requests that OCR accept jurisdiction, conduct an investigation, and after making appropriate findings, require Queens College to eliminate its discriminatory policies and practices, and the hostile environment toward students who are Muslim, Palestinian, Arab, South Asian, associated with such, or perceived as such.

In order to avoid further harm, the Complainant also requests that CUNY divest from all companies that enable or profit from Israel's genocide, apartheid, colonization, and war crimes against the Palestinian people. Most immediately, this includes divestment from the weapons manufacturers creating profits for CUNY through their participation in Israel's genocide in Gaza: Boeing, General Electric, Lockheed Martin, Northrop Grumman, and Raytheon. Complainant requests that CUNY end all of its exchange programs with Israel, as Israeli universities are engaged in documented complicity in Israel's oppression of Palestinians, and adhere to all principles of academic boycott. Moreover, Complainant requests that CUNY take measures to better protect students of all national origin, which would require the university and Queens College to cease the conflation of political ideologies such as Zionism with national origin or religious identity. As such, the Complainant requests that CUNY commit to a Title VI analysis that does not conflate criticism of a foreign government or political ideology with national-origin discrimination

Complainants do not accept as a remedy for the hardship they have suffered the institution of any speech-censorship policies aimed at students, faculty, staff, or administrators at Queens College. Complainant also does not accept as a remedy any expansion of campus public safety or police presence in or around Queens College.

VII. Conclusion

All communications regarding this complaint should be directed to (b)(6) at (b)(6); (b)(7)(A); (b)(7)(C) Should you need the address, Queens College is located at 65-30 Kissena Blvd, Queens, NY 11367. Thank you for your attention to this matter.

Sincerely,

QC STAIR

Signature:

(b)(6); (b)(7)(A); (b)(7)(C)

Signature

(b)(6); (b)(7)(A); (b)(7)(C)

04/09/2024

Date

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Counter-Protests and Administration's Lack of Action

I. Facts

On October 18, 2023, the Queens College Muslim Students Association (“QC MSA”) held a rally in solidarity with Palestine. A group of roughly 35-40 students gathered outside the Rosenthal Library around 12pm, with microphones, signs, and Palestinian flags. Both the president of the Queens College Students for Justice in Palestine (“QC SJP”) and a Jewish member of CUNY4Palestine spoke at the rally. These speeches discussed the complicity of the CUNY system in the ongoing genocide in Gaza. After the speakers finished, the group participated in various pro-Palestine chants. During these chants, counter protestors began yelling things like “you guys are ISIS!” and “you guys are terrorists!” The membership of QC MSA and QC SJP includes students who are Muslim, Arab, Palestinian, South Asian, associated with such, or perceived as such based on their skin tone and for wearing keffiyehs.

The counter protestors included student members of Queens College Persia (“QC Persia”) and the Queens College Israel Student Association (“QC ISA”) and at least one Queens College faculty member. This faculty member was (b)(6); (b)(7)(A); (b)(7)(C) who (b)(6); (b)(7)(A); (b)(7)(C)

(b)(6); (b)(7)(A); (b)(7)(C) Approximately one week before QC MSA’s October 18 rally, QC Persia and QC ISA hosted a memorial event to honor Israelis who died on October 7, 2023. At this event, students displayed Israeli flags and donned gear representing the Israeli Defense Forces (IDF). This event was also held outside the Rosenthal Library, and was attended by Queens College President Frank Wu. In contrast, however, President Frank Wu did not attend the rally in solidarity with Palestine.

Since the October 18 rally, similar counter-protests have continued. These counter protestors engage in chants calling QC MSA and QC SJP students “terrorists.” Additionally, despite the fact that (b)(6); (b)(7)(A); (b)(7)(C) at Queens College, he shows up to many pro-Palestine events to harass the students. For example, QC SJP hosted a rally on November 1, 2023 where students and the club’s faculty advisor gave speeches about Palestinian liberation. The students were overwhelmingly Muslim, Arab, Palestinian, South Asian, or could easily be perceived as such based on their skin tone, facial features, and decision to wear the keffiyeh. (b)(6); (b)(7)(A) showed up to counter-protest this rally along with other Zionist students and faculty members.

QC SJP organized another rally on November 10, 2023 in order to protest Queens College President Frank Wu’s targeted investigation of QC MSA and the school’s refusal to recognize Palestinian suffering in the ongoing genocide in Gaza. As such, students demanded 1) the end of the criminalization of Muslim students, 2) Palestinian recognition, and 3) a public

apology to Queens College Muslim, Arab, Palestinian, and South Asian students.¹ Once again, the students at this rally were overwhelmingly Muslim, Arab, Palestinian, South Asian, associated with such, or perceived as such. Zionist faculty and students also showed up to this rally with Israeli flags, where they videotaped the students who expressed solidarity with Palestine.

On November 27, 2023 an autonomous group of students who are mostly Muslim, Arab, Palestinian, South Asian, or likely to be perceived as such protested an “Israel Solidarity Event” that was held by the Bukharian Cultural Club at Queens College (“BCC QC”), Queens College Emet Students Association (“QC ESA”), and QC ISA. At this event, students at the Israeli Solidarity Event made Islamophobic and racist comments towards the protesting students. One student yelled, (b)(6); (b)(7)(A); (b)(7)(C) Someone also created a fake copycat version of the QC SJP Instagram account, and made a post *false*ly accusing a Muslim student of saying (b)(6); (b)(7)(A); (b)(7)(C) Another student posted an Instagram story with the caption, (b)(6); (b)(7)(A); (b)(7)(C)

(b)(6); (b)(7)(A); (b)(7)(C)

(b)(6); (b)(7)(A); (b)(7)(C) Students who witnessed this assault complained to (b)(6); (b)(7)(A); (b)(7)(C) who was present when it happened, but the officer said (b)(6); (b)(7)(A); (b)(7)(C) (b)(6); (b)(7)(A); (b)(7)(C) Members of the complainant organization have reason to believe that the student who (b)(6); (b)(7)(A); (b)(7)(C)

(b)(6); (b)(7)(A); (b)(7)(C) filed a formal complaint about the incident and had a meeting with an administrator named (b)(6); (b)(7)(A); (b)(7)(C) but (b)(6); (b)(7)(A); (b)(7)(C) refused to discuss the substance of her complaint during the meeting. When (b)(6); (b)(7)(A); (b)(7)(C) tried to schedule a follow-up meeting, (b)(6); (b)(7)(A); (b)(7)(C) never responded to her. When (b)(6); (b)(7)(A); (b)(7)(C) saw (b)(6); (b)(7)(A); (b)(7)(C) at a later rally, he accused her of not responding to his office’s request to meet. (b)(6); (b)(7)(A); (b)(7)(C) clarified that she had requested a follow-up meeting and never received a response. However, in the next communication (b)(6); (b)(7)(A); (b)(7)(C) received from (b)(6); (b)(7)(A); (b)(7)(C) he accused her of (b)(6); (b)(7)(A); (b)(7)(C) and warned her that such “disrespect” would not be tolerated. He also stated that any further incident in which (b)(6); (b)(7)(A); (b)(7)(C)

¹ See Exhibit A.

² See footage in the first slide here:

(b)(6); (b)(7)(A); (b)(7)(C)

³ See Exhibit B.

⁴ See Exhibit C.

⁵ See footage in the third slide here:

(b)(6); (b)(7)(A); (b)(7)(C)

See Exhibit D for a photo of (b)(6); (b)(7)(A); (b)(7)(C)

from his office.⁶ Meanwhile, the investigation into her complaint of (b)(6); has not progressed and the student who (b)(6); (b)(7)(A); (b)(7)(C)

II. Harm

The Queens College administration's failure to protect students from racist harassment and counter-protesting at pro-Palestine events contributes to a hostile educational environment. The insults lobbied against members of QC MSA and QC SJP (such as calling the students (b)(6); (b)(7)(A); reflect classic Islamophobic stereotypes often directed at students who are Muslim, Arab, Palestinian, South Asian, associated with such, or perceived as such. As a result of this discrimination, students who are perceived to be or are actually Muslim, Arab, Palestinian, and South Asian at Queens College have suffered emotional distress within a hostile educational environment. The fact that students are (b)(6); (b)(7)(A); because they advocate for Palestinian liberation has caused them to feel unsafe to express their opinions and unable to focus on their schoolwork. Since the counter protestors are fellow students, many Muslim, Arab, and South Asian students, or those perceived as such, are also nervous to attend class out of fear that they will be harassed or targeted in class. When these students walk into class they are constantly wondering who in the room may have participated in a recent counter-protest, or who may have witnessed Islamophobic, anti-Palestinian harassment and simply walked away.

(b)(6); (b)(7)(A); who is (b)(6); (b)(7)(A); (b)(7)(C) student, even expressed that they (b)(6); (b)(7)(A); (b)(7)(C)
(b)(6); (b)(7)(A); (b)(7)(C) They used to (b)(6); (b)(7)(A); (b)(7)(C) but they could not handle more harassment and discrimination. Now, (b)(6); (b)(7)(A); (b)(7)(C) when they are participating in rallies or other events for Palestine. They expressed, "But even though I only (b)(6); (b)(7)(A); (b)(7)(C) I am actively organizing⁷, sometimes I still have to go to class afterwards. On those days, my heart drops out of anxiety about who might be looking at me differently because of (b)(6); (b)(7)(A); (b)(7)(C)

(b)(6); expressed that the lack of response to her complaint made her feel "unheard and unseen." She stated, "As a (b)(6); student, especially a woman, no one should be (b)(6); (b)(7)(A). It made me feel so uncomfortable and unheard and unseen. This campus makes every (b)(6); student feel unheard and unseen." (b)(6); also expressed that witnessing the lack of response to the complaint made by (b)(6); a (b)(6); (b)(7)(A); (b)(7)(C) student, made them lose faith in the administration. It made them think, "If they're not taking (b)(6); seriously, about an incident when she was (b)(6); (b)(7)(A); (b)(7)(C) then they won't take any of our complaints seriously."

⁶ See Exhibit E.

⁷ This use of the term "organizing" refers to political and community organizing for a common political goal.

The Queens College administration's silence regarding these hateful counter-protests has sent the message to students who are, or are perceived to be, Muslim, Arab, Palestinian, and/or South Asian that they are not worthy of protection, as evidenced by (b)(6); (b)(7)(A); and (b)(6); experience. This failure to act has created a hostile environment at Queens College because students are forced to deal with intense anxiety and fear based on the discrimination that they have faced due to their identities and pro-Palestinian advocacy. This added stress, on top of keeping up with their workload as undergraduate students, has impacted the students' ability to complete work and fully participate in the academic community at Queens College.

Queens College's discrimination silences students who are Muslim, Arab, Palestinian, South Asian, associated with such, or perceived as such and creates a hostile environment for them where they experience unequal treatment and viewpoint discrimination. This treatment denies the complainant and all Muslim, Arab, Palestinian, and South Asian students at Queens College access to an educational environment free from discrimination.

Doxxing and Administration's Lack of Action

I. Facts

On November 28, 2023, an autonomous group of students who are Muslim, Arab, Palestinian, South Asian, associated with such, or perceived as such gathered to protest an Israel Solidarity Event hosted by Bukharian Cultural Club at Queens College (“BCC QC”), the Queens College Israeli Students Association (“QC ISA”), and the Queens College Emet Students Association (“QC ESA”). Videos were filmed of this rally and shared with a larger account called Bukharian Community. Bukharian Community posted the videos, which included the faces of students who are Muslim, Arab, Palestinian, South Asian, associated with such, or perceived as such based on their skin tone, facial features, and decision to wear the keffiyeh.⁸ One Palestinian alumnus of Queens College, named Anas Shuaib, spoke at this rally and was featured prominently in the Instagram posts made by Bukharian Community.

The caption and comments on the Bukharian Community’s posts include racist, Islamophobic, and ableist vitriol, such as assumptions about (b)(6); (b)(7)(A); (b)(7)(C)

(b)(6); (b)(7)(A); (b)(7)(C)

Another Queens College student, who is likely to be perceived as and is associated with students who are Muslim, South Asian, Palestinian, and Arab also found out that his phone number was leaked in connection to this incident. This student and (b)(6); realized that their phone numbers had been leaked after they started receiving calls and texts from unknown numbers. Some of these messages were originally sent in Hebrew but, when translated, were revealed to contain explicit and demeaning statements.¹²

Despite student complaints about doxxing, the Queens College administration has not taken any action to protect students. Students have spoken directly to members of the administration about the dangers presented by doxxing, and have also spoken publicly about the issue on social media. The administration has not offered any resources to support students who were doxxed, made any public statements condemning the hateful comments that were made

⁸ The Instagram posts made by Bukharian Community can be found [here](#) and [here](#).

⁹ See Exhibit F.

¹⁰ See Exhibit G.

¹¹ See Exhibit H for some examples of such messages.

¹² See Exhibit I.

about Queens College students and alumni, or taken any measures to hold students who engage in doxxing accountable.

II. Harm

As a result of the administration's failure to take action regarding the doxxing of Queens College students, Muslim, Arab, Palestinian, and South Asian students now feel as though the administration does not view this issue as a dangerous problem. The students who were doxxed are Muslim, Arab, Palestinian, and/or South Asian, or perceived as such. As a result, other students who share these identities now fear that if they were to be doxxed, they too would be left without any support or protection from their college administration.

The Queens College student whose phone number was leaked along with (b)(6); (b)(7)(A); stated, "When I received these text messages it was clear to me that they were sent as harassment and intimidation because of my pro-Palestine activism. I felt concerned because I had no idea how the person got my number and what other acts these zionist harassers would take to try to intimidate me to stop my opposition to Israel's genocidal assault against the people of Palestine. At the time when I received these texts I felt as though if I made a complaint about the incident it would not be taken seriously, and that on the contrary the Queens College administration may start to target me because of my Palestine activism. I felt this way because of Queens College President Frank H. Wu's statements condemning Queens College students for speaking out in support of Palestine and his statements in support of Israel and in effect Israel's genocidal actions."

(b)(6); (b)(7)(A); (b)(7)(C) who is a (b)(6); (b)(7)(A); (b)(7)(C) student, feels immense fear and anxiety as a result of the administration's lack of action. (b)(6); (b)(7)(A); (b)(7)(C) is (b)(6); (b)(7)(A); (b)(7)(C) community at Queens College, so their phone number is easily accessible in various WhatsApp. They want to continue to participate in these chats because it is important for them to be accessible to fellow students in the community, but they now worry that they should take measures to hide their phone number. This is because they know that if their phone number was leaked, they would not be able to rely on any support from the college administration.

The administration's lack of action contributes to a hostile environment for students who are Muslim, Arab, Palestinian, South Asian, or perceived as such. As a result of this inaction, these students feel as though their safety is not a priority for Queens College and experience increased stress about being targeted online or having their personal information publicly leaked. While students should be free to express their opinions on campus, these students who face a disproportionate risk of being doxxed are now increasingly afraid to do so. This stress and fear prevents students who are or are perceived to be Muslim, Arab, Palestinian and/or South Asian from being able to focus on their schoolwork and fully participate in their classes.

Presence of New York Police Officers on Campus

I. Facts

In recent months, there has been a significant increase in the presence of NYPD and other law enforcement officers on the Queens College campus. The Queens College administration has disproportionately deployed police and law enforcement officers against students and student organizations that are Muslim, Arab, Palestinian, South Asian, associated with such, or perceived as such.

On Wednesday, October 18, 2023, the Queens College Muslim Students Association (“MSA”) held the first of several rallies in support of Palestinian liberation and to protest the ongoing genocide in Gaza. The event consisted of approximately 35-40 students with microphones, signs, and flags gathering outside the Rosenthal Library where they heard two speakers, one from Students for Justice in Palestine (“SJP”) and another from CUNY4Palestine. In response to the event, there were 50 law enforcement officers present, outnumbering the participants in the rally. Members of the complainant organization have reason to believe that Queens College requested NYPD and other law enforcement officers be present in response to organizing by students who are, are perceived to be, or are associated with Muslim, Arab, Palestinian, South Asian. The students who joined this rally, most of whom were Muslim, Arab, Palestinian, South Asian, associated with such, or perceived as such, felt threatened and silenced by the law enforcement presence at the event.

An event hosted a week before by the Israeli Students Association (ISA), which was a memorial but similarly had speakers, signs, and flags, was not policed to the same level. In fact, members of the complainant organizations have reason to believe that there was no police presence at all at the ISA event. Many students who joined the October 18 MSA rally witnessed the disparity in policing compared to the October 7 ISA event. The complainants were disturbed that the administration would treat the two events so differently and only request a significant police presence for the MSA rally. Students who noted this imbalanced policing while attending the October 18 MSA rally, most of whom were Muslim, Arab, Palestinian, South Asian, associated with such, or perceived as such, felt threatened and silenced by the biased reaction of the administration.

There has also continued to be a significant police and law enforcement presence at pro-Palestine rallies that have occurred since October 18, 2023. Student members of Queens College Students for Justice in Palestine (QC SJP) held another rally on November 1st, 2023 in order to continue to express their support for Palestinian liberation. At this rally, a member of the complainant organization described an “overwhelming police presence” where the NYPD and other law enforcement officers physically surrounded the demonstration. There were also several NYPD vans in close proximity and law enforcement scattered throughout the campus. The

member of the complainant organization described a similar police presence for another QC SJP rally held on November 10, 2023, including an overwhelming police presence that physically surrounded the rally, police vans, and law enforcement placed throughout the Queens College campus. Significant police presence around rally goers and throughout Queens College campus also occurred at the January 25th, 2024 Back to School Rally and February 8th, 2024 Student Walk Out, both of which were hosted by QC SJP.

Recently, the police presence has become more aggressive. On March 4, 2024, a group of students who are Muslim, Arab, Palestinian, South Asian, or perceived as such gathered in protest of an event featuring [b](6); (b)(7)(A); (b)(7)(C)

At this event, there was a confrontation between [b](6); (b)(7)(A); (b)(7)(C) a member of the complainant organization, and [b](6); (b)(7)(A); (b)(7)(C)

[b](6); (b)(7)(A); (b)(7)(C) demanded that [b](6); (b)(7)(A); and other attendees protest behind an unspecified line to keep the entryway of a building clear, despite the fact that people were utilizing the entryway without issue. This conflict began to escalate as [b](6); (b)(7)(A); (b)(7)(C) “herded” the rally attendees backwards as [b](6); (b)(7)(A); and surrounding attendees, argued with [b](6); (b)(7)(A); (b)(7)(C). Eventually, this was defused by a shift in the rally. [b](6); (b)(7)(A); (b)(7)(C) during this encounter.

A [b](6); (b)(7)(A); alumnus of Queens College named [b](6); (b)(7)(A); was also present and engaged in the same March 4th event. When the [b](6); (b)(7)(A); left the event and walked through part of campus with a police security detail, the [b](6); (b)(7)(A); (b)(7)(C) When the [b](6); (b)(7)(A); alumnus saw this, [b](6); (b)(7)(A); (b)(7)(C) [b](6); (b)(7)(A); The police security details proceeded to [b](6); (b)(7)(A); (b)(7)(C) [b](6); (b)(7)(A); (b)(7)(C) and witnessed by many students, many of whom are members of the complainant organizations. Those who witnessed this event, as well as the above Marth 4th interaction with police at the rally, most of whom were Muslim, Arab, Palestinian, South Asian, associated with such, or perceived as such, felt threatened and physically unsafe during these events and continue to feel so as a result of the police conduct whenever law enforcement is present.

II. Harm

Given the NYPD's history of surveilling Muslim students¹⁴ and disproportionately targeting people of color¹⁵, Muslim, Arab, Palestinian, and South Asian students have felt unsafe

¹³ See Exhibit J for a screen capture of the video.

¹⁴ See ACLU Factsheet on the NYPD Muslim Surveillance Program:

<https://www.aclu.org/documents/factsheet-nypd-muslim-surveillance-program>

¹⁵ See NYCLU article titled “Black, Latinx People Were 90 Percent of Those Arrested in NYPD Traffic Stops”

<https://www.nyclu.org/en/news/black-latinx-people-were-90-percent-those-arrested-nypd-traffic-stops>

due to the increased presence of law enforcement at Queens College. These students felt targeted since their events were more heavily policed than events hosted by students who are not Muslim, Arab, Palestinian, and/or South Asian. Whether the Queens College administration has explicitly requested this increase in law enforcement or simply allowed it to continue, the administration's actions have contributed to a hostile environment that creates an unequal learning environment for students who are Muslim, Arab, Palestinian, South Asian, associated with such, or perceived as such. These students felt discouraged from attending their classes, discouraged from using school resources, discouraged from participating in student organizations, experienced anxiety while on campus or about attending campus, and were distracted from their schoolwork.

The heavy law enforcement presence and the baseless fear and concern expressed by the administration in response to, at, and in relation to organizing efforts by students who are Muslim, Arab, Palestinian, South Asian, associated with such, or perceived as such threatened their organizing and speech, especially as compared to that of other students taking similar actions. Queens College's request for law enforcement presence in response to organizing by these students, the implied threat of the continued law enforcement presence on the organizing by these students, and the different treatment faced by these students compared to their peers sent a clear message to these students: that they do not have the same rights as their non-Palestinian, non-Arab, non-South Asian, or non-Muslim counterparts.

Targeting of Queens College MSA Political Speech on Instagram

I. Facts

On November 7, 2023, the Queens College Muslim Students Association (“QC MSA”) Instagram account posted an Instagram Story expressing skepticism about Israeli-originating reports about the events of October 7th while expressing support for Palestinian liberation and resistance to occupation (the “Post”).¹⁶ The Post began to circulate widely on social media before coming to the attention of Queens College President Frank Wu. On November 9, 2023, President Wu sent three identical emails (the “Email”) disavowing the Post and calling out MSA specifically, stating that the post would be reviewed for violating policy and violators would be disciplined, and that Queens College had “contacted and will continue to cooperate with the NYPD regarding these incidents.”¹⁷ As an Instagram Story, the Post expired after 24 hours. The complainant has reason to believe that the QC MSA was contacted after the Post expired and warned against future posts of that nature.

II. Harm

The conduct of President Wu and the Queens College administration has made the complainant, and its members, feel targeted while at Queens College. The involvement of the NYPD, a group with a long history of targeting students who are Muslim, Palestinian, Arab, and South Asian, perceived as such, or associated with such, in the CUNY system has made members of the complainant organization concerned about surveillance and their safety. The complainant believes that the Post was an expression of a legitimate political position questioning the veracity of Israeli-reported statistics and events. They also believe that this was no different from other posts made by student groups stating various points of view on either these events or past events. The complainant feels that the Post and Queens College MSA were targeted by President Wu and the Queens College administration for their support of Palestinian liberation. The complainant also believes this is a targeted attempt to limit the conduct of students who are Muslim, Arab, Palestinian, South Asian, associated with such, or perceived as such. Since the Email was sent, these students have felt threatened, silenced, and targeted by President Wu and the Queens College administration.

For Queens College to restrict such expression from students harms their educational and professional development, as they feel targeted, silenced, and threatened while on campus.

(b)(6); (b)(7)(A) who is a (b)(6); (b)(7)(A); (b)(7)(C) student, has expressed that they (b)(6); (b)(7)(A); (b)(7)(C) They

¹⁶ Amir Khafagy, *Queens College and NYPD Investigate Muslim Student Association’s Instagram Post*, <https://documentedny.com/2024/01/26/muslim-students-nypd-instagram-queens-college/>, Documented (January 26, 2024).

¹⁷ See Exhibit K.

expressed, “But even though I [b](6); (b)(7)(A); (b)(7)(C)] when I am actively organizing, sometimes I still have to go to class afterwards. On those days, my heart drops out of anxiety about who might be looking at me differently [b](6); (b)(7)(A); (b)(7)(C)].” Additionally, [b](6); [b](7)(A); [b](7)(C)] has knowledge of students who avoid discussing issues of Palestinian Liberation in class for fear of backlash.

President Wu and the Queens College administration’s actions against the Queens College MSA and the Post makes the complainant feel that students who are Muslim, Arab, Palestinian, South Asian, are perceived as such, or associated with such are being threatened and silenced. This creates a hostile environment for these students where they experience or fear unequal treatment, viewpoint discrimination, and other negative impacts on their education. This situation denies the complainant and all students at Queens College who are Muslim, Arab, Palestinian, South Asian, perceived as such, or associate with such, access to an educational environment free from discrimination.

Queens College Administration Response to “Bomb Threat”

I. Facts

On the morning of February 22, 2024, an anonymous email from a protonmail account was sent to the Queens College administration stating that something had been left on campus and would explode at 3:30 pm (the “Bomb Threat”). At the end of the email, it was signed “Inshallah, Allahu Akbar.” The email was not officially announced until 2:50 pm but news of it spread to students before this and a notification of the Bomb Threat went out on Citizen at 2:30 pm. Members of the complainant organization, as well as other Arabic speakers, noted quickly that “Inshallah, Allahu Akbar” are phrases that are not said together. It is a nonsensical combination of common Arabic phrases seemingly designed to imply a Muslim origin to the email but written by a non-Arabic speaker. This understanding was quickly spread by the complainant and their members, one of which stated that, to their knowledge, the Queens College student body largely were unconcerned by the Bomb Threat as word of the likely-fake nature of the email was spread.¹⁸

Despite this, the report of the email was quickly seized by an organization engaged in propaganda efforts against Palestinian liberation. One tweet posted about the Bomb Threat well after the alleged explosion time and claimed it was a “credible threat.”¹⁹ As mentioned above, Queens College sent out a message at 2:50 pm stating that they had received the email and were investigating. An hour later, Queens College sent another email stating there was no danger and that the investigation was concluded.

In the face of the continued Islamophobia, as described in other complaints, and the Islamophobic nature of the Bomb Threat, Queens College did nothing. Their email stating the investigation was over did not mention that weaponization of the Bomb Threat, which had gone public. It did not acknowledge the Islamophobic nature of the Bomb Threat and denounce it. The Queens College administration did not even state that there was no indication the Bomb Threat was written by an Arabic speaker. They simply stated that the investigation was over without further comment. Additionally, the complainant organization, in collaboration with CUNY4Palestine, posted a response to the events that included the concerned comments of many anonymous Queens College students, faculty, and alumni.²⁰ President Wu and the Queens College administration did not respond to or comment on this statement.

II. Harm

The Queens College administration’s failure to denounce the Islamophobia stemming from the Bomb Threat as well as failure to support student organizations like the complainant

¹⁸ See Exhibit J, also found here

https://www.instagram.com/p/C35rphAOpip/?igsh=MXZjcDlvM2t1dHU2NA%3D%3D&img_index=1.

¹⁹ See Exhibit L, also found <https://twitter.com/stopantisemites/status/1760767958626820240?s=46>.

²⁰ See Exhibit M - Q.

and students who are Muslim, Arab, Palestinian, South Asian, associated with such, or perceived as such has led to a hostile environment. Students who are Muslim, Arab, Palestinian, South Asian feel like they are not worthy of the school's protection because of the administration's failure to denounce the fake Bomb Threat and acknowledge Islamophobia. (b)(6); (b)(6); (b)(6); (b)(7)(A); (b)(7)(C) who is a (b)(6); (b)(7)(A); (b)(7)(C) student, stated that, "Even when Islamophobia is right in their face, they still don't do anything about it." This failure to act has contributed to the creation of a hostile environment at Queens College as students already concerned by events outlined in the other complaints further feel that Queens College will not protect or defend them. This added stress, on top of keeping up with their workload as undergraduate students, has impacted the students' ability to complete work and fully participate in the academic community at Queens College.

One Queens College student stated the following: "To be completely honest, it's mortifying to see such a horrific scare tactic used by racist pro-genocide oppressors to try to silence and repress the push for a free Palestine on-campus, and I especially feel an infinite sorrow and pain for my Palestinian, Arab, Brown, and Muslim peers within the pro-Palestine movement in Queens College who are likely to face more harassment and violence than ever all because of a staged, baseless 'threat' designed to repress anti-genocide voices just as they had in the 2000's."

Queens College's discrimination silences students who are Muslim, Arab, Palestinian, South Asian, associated with such, or perceived as such and creates a hostile environment for them where they experience unequal treatment and viewpoint discrimination. This treatment denies complainant and all students at Queens College who are Muslim, Arab, Palestinian, South Asian, associated with such, or perceived as such access to an educational environment free from discrimination.

Surveillance of the Queens College Muslim Students Association (“MSA”)

I. Facts

On or around October 18, 2023, a security guard was stationed at the Queens College Hillel (“QC Hillel”) entrance. The QC Hillel is across the MSA rooms, which houses prayer rooms for Muslim students and where many Muslim, Arab, South Asian, and/or Palestinian students congregate. The Hillel security guard is unlike the regular campus security, who often wear navy blue uniforms. The security guard stands facing the MSA rooms and wears a beige uniform with “security” written on the back of his jacket and carries a radio.²¹ Since the end of October 2023, the security guard has been present consistently, with a direct view of the MSA rooms, and remains to this day.

On Queens College Club Day, February 7, 2024, the Queens College Students Justice for Palestine (“SJP”) assembled in front of the MSA rooms. SJP wanted to bring awareness to a pro-Palestinian protest at Washington Square Park. The SJP and MSA members went to the MSA rooms to gather materials and the people around. As (b)(6); a (b)(6); (b)(7)(A); (b)(7)(C) student and member of SJP, was leaving the MSA room, he noticed that there were (b)(6); (b)(7)(A); (b)(7)(C) near the MSA rooms. The (b)(6); (b)(7)(A); (b)(7)(C) and the Hillel (b)(6); (b)(6); was not there. One of the (b)(6); (b)(7)(A); had a long notebook and appeared to be writing everything happening in the MSA rooms.

On March 4, 2024, in preparation for a pro-Palestinian counter-protest, (b)(6); a (b)(6); (b)(6); (b)(7)(A); student – along with other members of MSA – went to the MSA rooms to get a megaphone. He asked another MSA student – an (b)(6); (b)(7)(A); (b)(7)(C) man – in the room to help him figure out how to turn on the megaphone, as he had no experience with it. While standing at the doorway, but not entirely outside the MSA room, the student helped (b)(6); (b)(7)(A); turn on the megaphone. The (b)(6); (b)(7)(A); (b)(7)(C) student began to (b)(6); (b)(7)(A); (b)(7)(C) The (b)(6); (b)(7)(A); (b)(7)(C) at the QC Hillel approached (b)(6); and the other MSA members who were present and demanded that the students stop (b)(6); (b)(7)(A); (b)(7)(C) by ordering them to “stop doing that” twice. The MSA students explained that he was (b)(6); (b)(7)(A); (b)(7)(C) and that it was normal. (b)(6); (b)(7)(A); (b)(7)(C) told the MSA students “to take it inside,” the MSA rooms.

II. Harm

The Queens College administration's decision to place a security guard outside of the MSA rooms has created a discriminatory and hostile environment for Palestinian, Arab, South Asian, and/or Muslim students and those perceived to be such.

²¹ See Exhibit R.

The consistent presence of a security guard outside of the MSA rooms has created a discriminatory and hostile environment by exerting fear, anxiety, intimidation, and alienation to Palestinian, Arab, South Asian, and/or Muslim students. Being told to stop (b)(6); (b)(7)(A); (b)(7)(C) (b)(6); (b)(7)(A); (b)(7)(C) and then to “take it inside” has made MSA members feel as if they do not belong at Queens College. (b)(6); (b)(7)(A); (b)(7)(C) a (b)(6); (b)(7)(A); (b)(7)(C) student, avoids the MSA room as much as possible because it feels “dystopian” that (b)(6); (b)(7)(A); (b)(6); (b)(7)(A); (b)(7)(C) could make the (b)(6); (b)(7)(A); (b)(7)(C) treat him as if he did something wrong. Other MSA members fear MSA is being watched and are choosing to limit their engagement with the organization. These fears and anxiety are exacerbated by the long history of surveillance of MSA at CUNY campuses.²²

In addition, the surveillance of the MSA rooms perpetuates Islamophobic stereotypes that Arab, Palestinian, South Asian, and/or Muslim students need extra “security” because of their national origins or religion. These stereotypes are harmful to the students because they induce hurt, fear, and anxiety. This hostile environment has been detrimental to students' health and prevented them from actively participating in campus life. (b)(6); (b)(7)(A); (b)(7)(C) now fears the next time he (b)(6); (b)(7)(A); (b)(7)(C) in public and whether this will make him a target for further surveillance. This has led to an inability to actively participate in his classes or on campus.

²² Chris Hawley, *NYPD Monitored Muslim Students All Over Northeast*, <https://www.ap.org/media-center/ap-in-the-news/2012/nypd-monitored-muslim-students-all-over-northeast/>, The Associated Press (February 18, 2012).

Counter-protest to the Israeli Defense Forces Soldier Event

I. Facts

On February 28, 2024, the Queens College Emet Student association (“ESA”) together with the Bukharian Cultural Club (“BCC”), Queens College Persian Club (“QC Persian Club”), and Queens College Israeli Associate (“QC ISA”), invited a former Israeli Defense Force (“IDF”) soldier to speak at the Campbell Dome at the Queens College campus.²³ The event was named “Inspiration from an IDF Soldier” and the flier advertised the IDF soldier as, “a special guest speaker who **just got out of Gaza** to come share their story about their experience in the conflict...”²⁴

In response SJP and STAIR, with support of many other students, emailed the Queens College administration to express that the presence of an IDF soldier on campus was dangerous to Arab, Muslim, South Asian, and/or Palestinian students and those perceived to be such.²⁵ Over one hundred emails²⁶ were sent to the Queens College Administration and the administration did not respond to the students' demands, nor acknowledged their fear.²⁷ In addition to the students' demands, faculty members asked the Queens College administration whether proper procedure for the event had been followed and asked why an IDF soldier would be allowed on campus. The administration stated that the student organization had alerted the administration in advance and that they found “nothing incriminating” on the IDF soldier.

Due to the administration's unresponsiveness to the concerns of Muslim, Arab, Palestinian, and/or South Asian community, on March 3, 2024, SJP and STAIR announced a protest outside of the Campbell Dome to protest the IDF's soldiers appearing on campus.²⁸ On March 4, 2024, the day of the protest, approximately thirty students and some alumni were present. The Queens College administration provided the IDF soldier with a security detail that included NYPD officers. The security detail included the transporting of the soldier in a golf cart to and from the event.

Once the event began, the NYPD officers blocked students from going into the events and placed their hands on students.²⁹ Unlike any other police response on the Queens College

²³ See Exhibit S, Instagram Post from QC Emet, can also be found here:

<https://www.instagram.com/p/C34QTp6OPPc/?igsh=MXc4MDZzNnUweGZyNg%3D%3D>

²⁴ *Id.*

²⁵ See Exhibit T, Email Template SJP and STAIR shared with the Queens College Community.

²⁶ See Exhibit U, Email sent to Queens College Administration.

²⁷ See Exhibit V, Instagram Post from QC SJP.

²⁸ See Exhibit W, Can also be found at:

https://www.instagram.com/p/C4EMWylOISm/?igsh=MWk4N3dnN3EwN3YxYg%3D%3D&img_index=1

²⁹ See Exhibit X, Can also be found at:

https://www.instagram.com/p/C4LKKWxu-f5/?igsh=aXU1dGJndm0zaG93&img_index=6

Campus, the NYPD aggressively responded to the student protest. The NYPD began to make requests of protesters such as not crossing the line, although there was no specific line or barrier. A [b](6); [b](7)(A); [b](7)(C) student who was standing in front of the protest with a [b](6); [b](7)(A); [b](7)(C) [b](6); was told not to cross the NYPD's imaginary line and when asked "what line" by the student, the NYPD officer stepped towards the student and told him he could "not step past this line" and began to push protestors backwards. This restricted the SJP and STAIR students and allies movements throughout the protest.

In addition, NYPD officers [b](6); [b](7)(A); [b](7)(C) a [b](6); [b](7)(A); [b](7)(C) man, and [b](6); [b](7)(A); [b](7)(C) The Queens College administration had chosen to [b](6); [b](7)(A); [b](7)(C) [b](6); [b](7)(A); [b](7)(C) The administration had yet to issue any apology to students who are Arab, South Asian, Muslim, and/or Palestinian.

II. Harm

The Queens College administration's failure to address the concerns of Arab, Muslim, South Asian, and/or Palestinian students about an event in which an IDF soldier participated has created a hostile and dangerous environment for said communities. Students who are Arab, Muslim, South Asian, Palestinian, or perceived as such do not feel protected by the Queens College administration. The lack of protection and acknowledgment of their concerns and well-being by the Queens College administration has caused students who are Arab, Muslim, South Asian, and/or Palestinian extreme emotional distress, an inability to be a full participant in campus life, disruption of their learning and academic studies, and a grave impact on their well being and mental health.

IDF soldiers' crimes against Palestinians are numerous and not debatable as many government and non-governmental agencies have reported the egregious human rights violations committed by IDF soldiers in Gaza and the West Bank. For example, on February 5, 2024, Amnesty International reported the "shocking spike" in the lethal, unlawful, and extrajudicial killings of Palestinians in the West Bank by the IDF.³¹ On February 19, 2024, the United Nations Human Rights, Office of the High Commissioner ("UNHCR"), "expressed alarm over credible allegations of egregious human rights violation to which Palestinian women and girls continue to be subjected in the Gaza Strip and the West Bank."³² The UNHCR report details the extrajudicial

³⁰ See Exhibit J.

³¹ Amnesty International, *Shocking spike in use of unlawful lethal force by Israeli forces against Palestinians in the occupied West Bank*, <https://www.amnesty.org/en/latest/news/2024/02/shocking-spike-in-use-of-unlawful-lethal-force-by-israeli-forces-against-palestinians-in-the-occupied-west-bank/> (February 5, 2024).

³² United Nations Human Rights, Office of the High Commissioner ("UNHCR"), *Israel/oPt: UN experts appalled by reported human rights violations against Palestinian women and girls*, <https://www.ohchr.org/en/press-releases/2024/02/israeloPt-un-experts-appalled-reported-human-rights-violations-against> (February 19, 2024); Nick Robertson, *UN experts condemn 'credible' reports of executions, sexual assault by Israeli soldiers*, The Hill, (February 19, 2024).

killings of women and girls who many were holding “white flags” when their bodies were found. *Id.* The arbitrary and inhumane conditions of detention of women and girls many of whom have been subjected to various forms of sexual assault, such as being stripped naked in front of IDF soldiers. *Id.* Even lawyers within the Israeli regime have begun to conduct investigations on the criminal offenses and misconduct of IDF soldiers in Gaza.³³ Lastly, IDF soldiers have continuously recorded themselves committing war crimes without any repercussions due to the lack of impunity by the Israeli government and the world.³⁴

The Queens College administration has perpetuated this lack of impunity by allowing an IDF soldier who “just got out of Gaza” to speak on the Queens College campus. (b)(6); (b)(7)(A); (b)(6); (b)(7)(A); (b)(7)(C) at the Queen's Campus, (b)(6); (b)(7)(A); (b)(7)(C) (b)(6); (b)(7)(A); (b)(7)(C) The IDF soldier spoke about his most recent services in occupied Palestine during the event. He stated that his unit was sent into the West Bank for operations and (b)(6); (b)(7)(A); (b)(7)(C) *Id.* He spent numerous days in Gaza including a stretch of twenty-four days straight. *Id.* In his speech he describes acts such as (b)(6); (b)(7)(A); (b)(7)(C) (b)(6); (b)(7)(A); (b)(7)(C) *Id.* Throughout the event, (b)(6); (b)(7)(A); (b)(6); (b)(7)(A); (b)(7)(C)

The dehumanization of the Palestinian people is one of the many reasons the Queens College community, including faculty members, felt unsafe by the presence of the IDF soldier on campus. One faculty member stated:

“The day that Queens College welcomed an IDF soldier to campus, I lost faith in the administration of our institution. The IDF is responsible for the deaths of over 33,000 people, nearly half of them children. The fact that (b)(6); (b)(7)(A); (b)(7)(C) (b)(6); was hosted on campus signals to our students and university community at large that Queens College does not support human rights. I'm alarmed and frankly scared. Queens College needs to be held accountable.”

³³ David S. Cloud, *Israel Military Investigates Soldiers for Criminal Offenses in Gaza War*, The Wall Street Journal, <https://www.wsj.com/world/middle-east/israel-military-investigates-soldiers-for-criminal-offenses-in-gaza-war-8fe2d947>, (February 21, 2024).

³⁴ Yara Hawari, *Why are Israeli soldiers sharing snuff videos from their genocide in Gaza?*, AlJazeera, <https://www.aljazeera.com/opinions/2024/1/24/why-are-israeli-soldiers-sharing-snuff-videos-from-their-genocide-in-gaza> (January 24, 2024).

(b)(6); (b)(7)(A); (b)(7)(C)

³⁶ Ramona Wadi, *The IDF's propaganda no longer holds any weight* <https://www.middleeastmonitor.com/20240107-the-idfs-propaganda-no-longer-holds-any-weight/>, MEMO Middle East Monitor, (January 7, 2024).

Allowing such an event to take place on the Queens College campus while disregarding the concerns of SJP and STAIR members, most of whom are Arab, Muslim, South Asian, and/or Palestinian students and alums, shows a complete disregard to the humanity of said communities. Having to see and hear from an individual who actively chose to participate in an ongoing genocide wretchedly demonstrates that the Queens College administration values the care of certain communities over others. By allowing such an event, a hostile educational environment has been sustained by the Queens College administration impacting the well-being and disrupting the education environment of Arab, Muslim, South Asian, and/or Palestinian students and those perceived to be such. A (b)(6); (b)(7)(A); (b)(7)(C) SJP and STAIR member, stated that he felt “physically unsafe” by the interactions with the NYPD officers during the protest due to their aggressiveness.

The IDF soldier event also demonstrated the differential treatment towards Arab, Muslim, South Asian, and/or Palestinian students, as events put together by the Muslim Student Association were canceled by the Queens college administration for security concerns. While the security concerns of Muslim, Arab, South Asian, and/or Palestinian students are not addressed. The IDF soldier event instead received a special envoy of NYPD officers who escorted the soldier in and out of the event and provided him with a golf cart. Arab, Muslim, South Asian, and/or Palestinian and those perceived to be such by association, do not feel welcomed, listened to or cared for by the Queens College administration because they have maintained a hostile environment toward their communities. This has affected their educational well-being, progress and ability to be full participants in classes and campus life as they do not feel safe to do so.

EXHIBITS

Exhibit A

OUR THREE DEMANDS

1) WE DEMAND THE END OF CRIMINALISING MUSLIM STUDENTS

The President of Queens College, Frank Wu, has launched an investigation on the QCMSA's social media account. He has involved NYPD despite the NYPD's history of surveilling, bullying, intimidating, and infiltrating Muslim college student organizations. His exclusionary language and deliberate enforcement of policing has enabled campus and online Islamophobia, racism, and xenophobia within the QC community. Muslim students have been reporting harassment only to receive silence from Wu's administration.

2) WE DEMAND PALESTINIAN RECOGNITION

Frank Wu has repeatedly failed to acknowledge the existence of Palestinians. For the past couple weeks Wu has not uttered the word "Palestine" in any of his emails. Frank Wu has not condemned the IOF for killing more than 11,000 Palestinian civilians since Oct 7. His hypocritical actions have shown he does not care for his Muslim, Arab, and brown students as he claims to do.

3) WE DEMAND A PUBLIC APOLOGY TO QUEENS COLLEGE MUSLIM, BROWN & PALESTINIAN STUDENTS

We cannot allow a repeat of the aftermath of 9/11, wherein Muslims, immigrants, Sikhs, Arabs, and brown people were targeted by sanctioned racism. We know our rights were violated, and we will not tolerate the racial stigma and community fearmongering perpetuated throughout Wu's many communications with the student body. We will not be intimidated, and we will not stop fighting for Palestine's liberation.

Nov 13, 12:15 PM in front of Kiley Hall, Queens College

QUEENS COLLEGE
SUPPORTERS OF PALESTINE

(b)(6);
(b)(7)(A);
(b)(7)(C)

(b)(6);
(b)(7)(A);
(b)(7)(C)

21w 17 likes Reply ...

21w 13 likes Reply

Liked by (b)(6); and others
November 12, 2023

Add a comment... Post

Exhibit B

(b)(6); (b)(7)(A); (b)(7)(C)

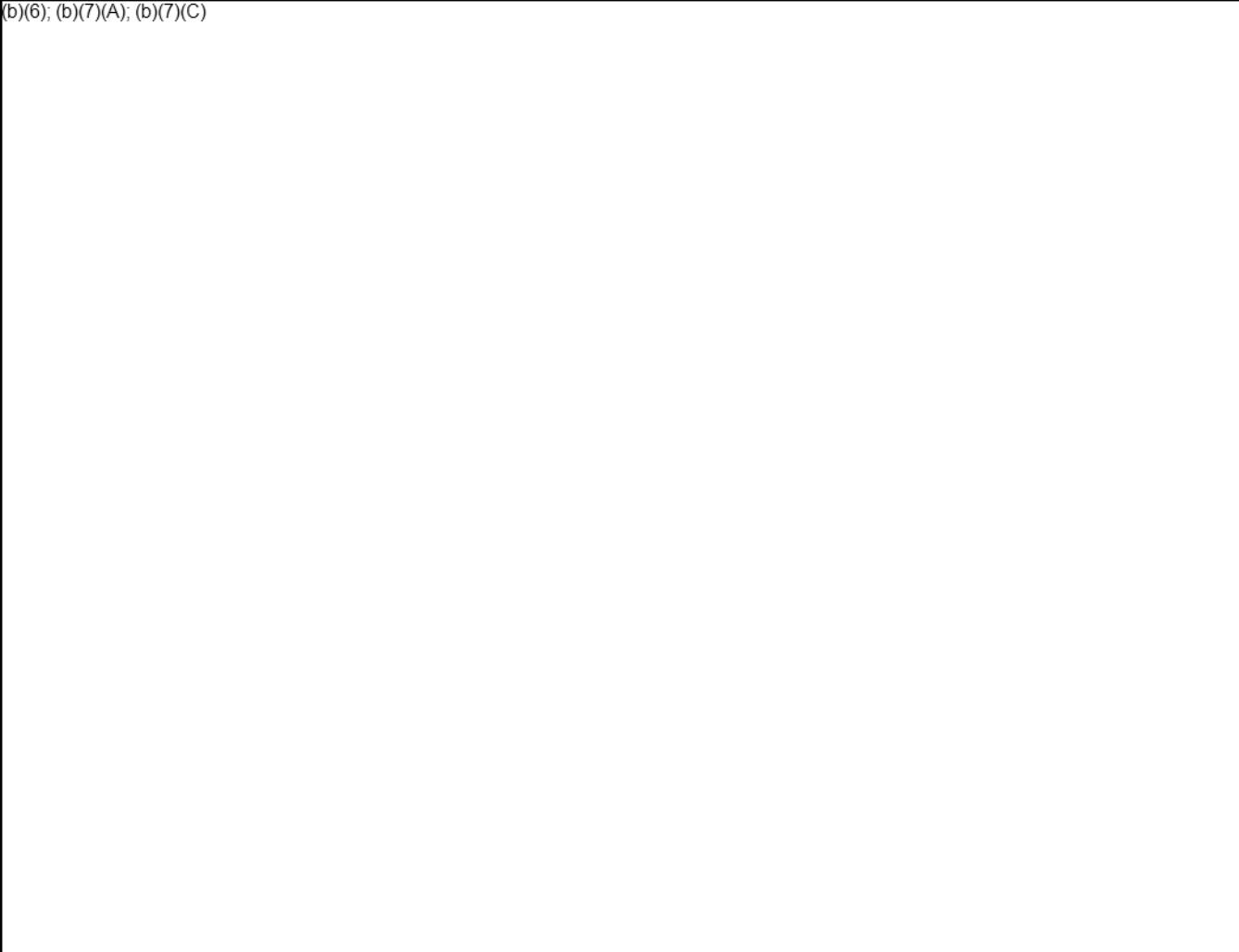


Exhibit C

(b)(6), (b)(7)(A), (b)(7)(C)



Exhibit D

(b)(6); (b)(7)(A); (b)(7)(C)

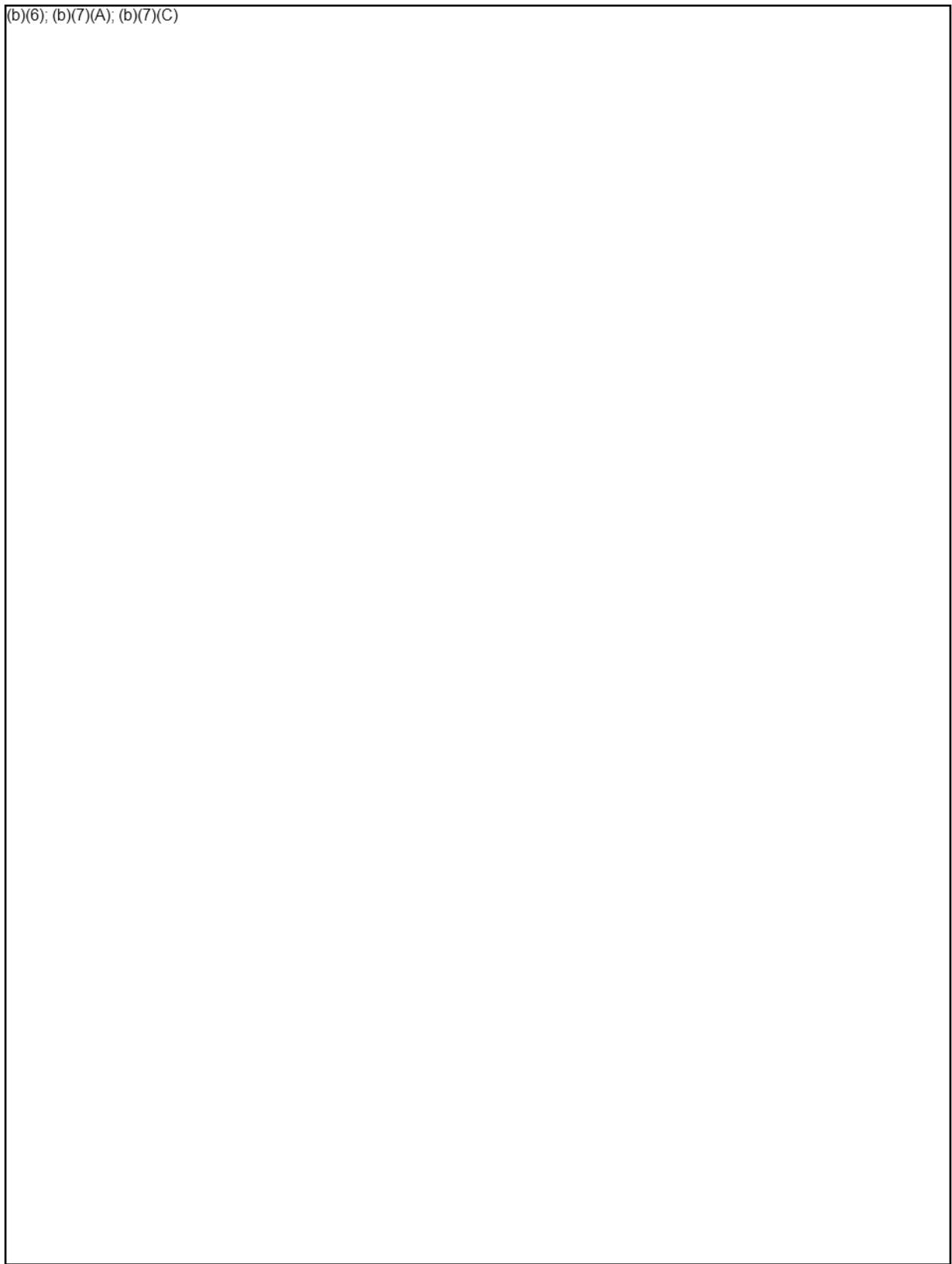


Exhibit E

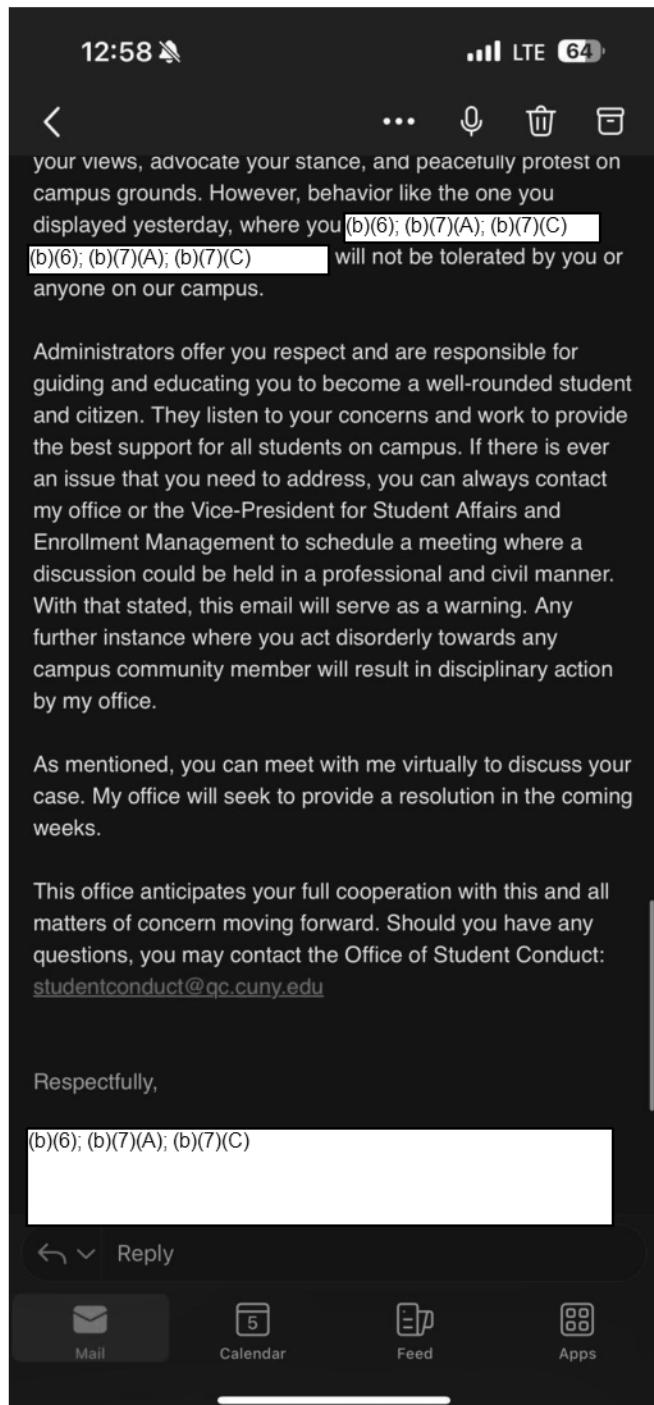
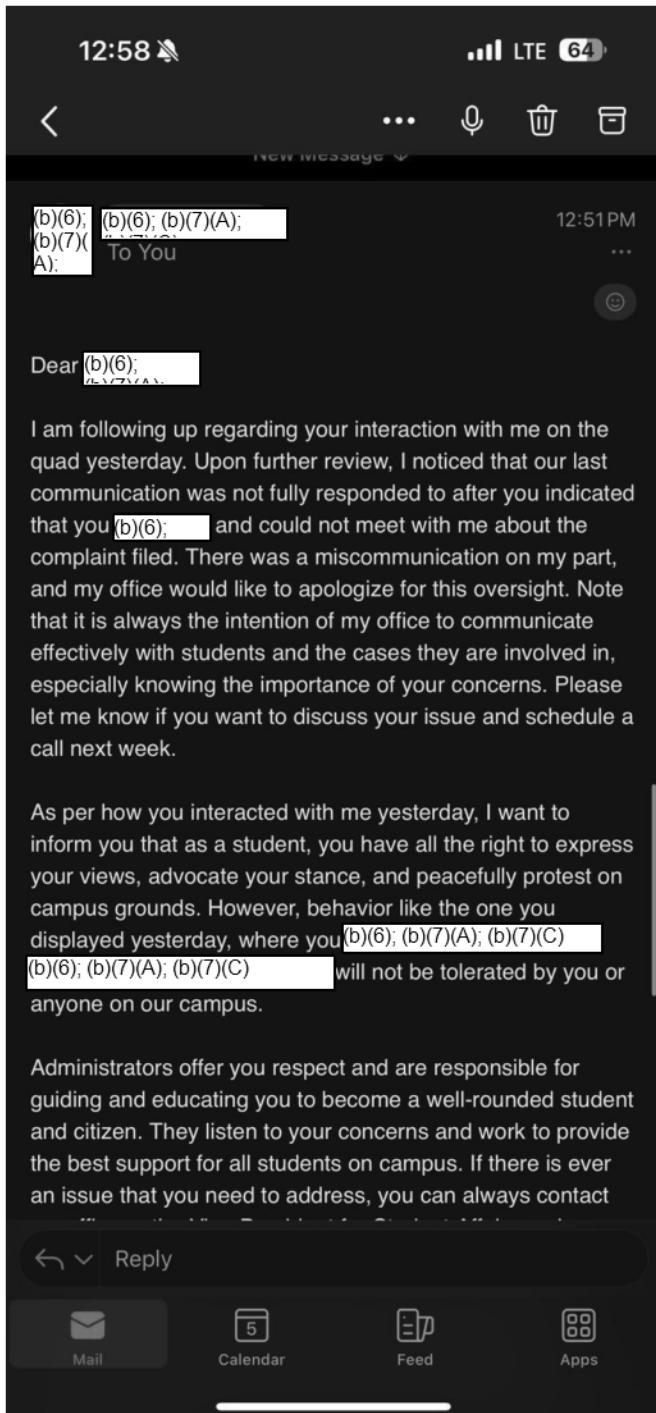


Exhibit F

(b)(6); (b)(7)(A); (b)(7)(C)

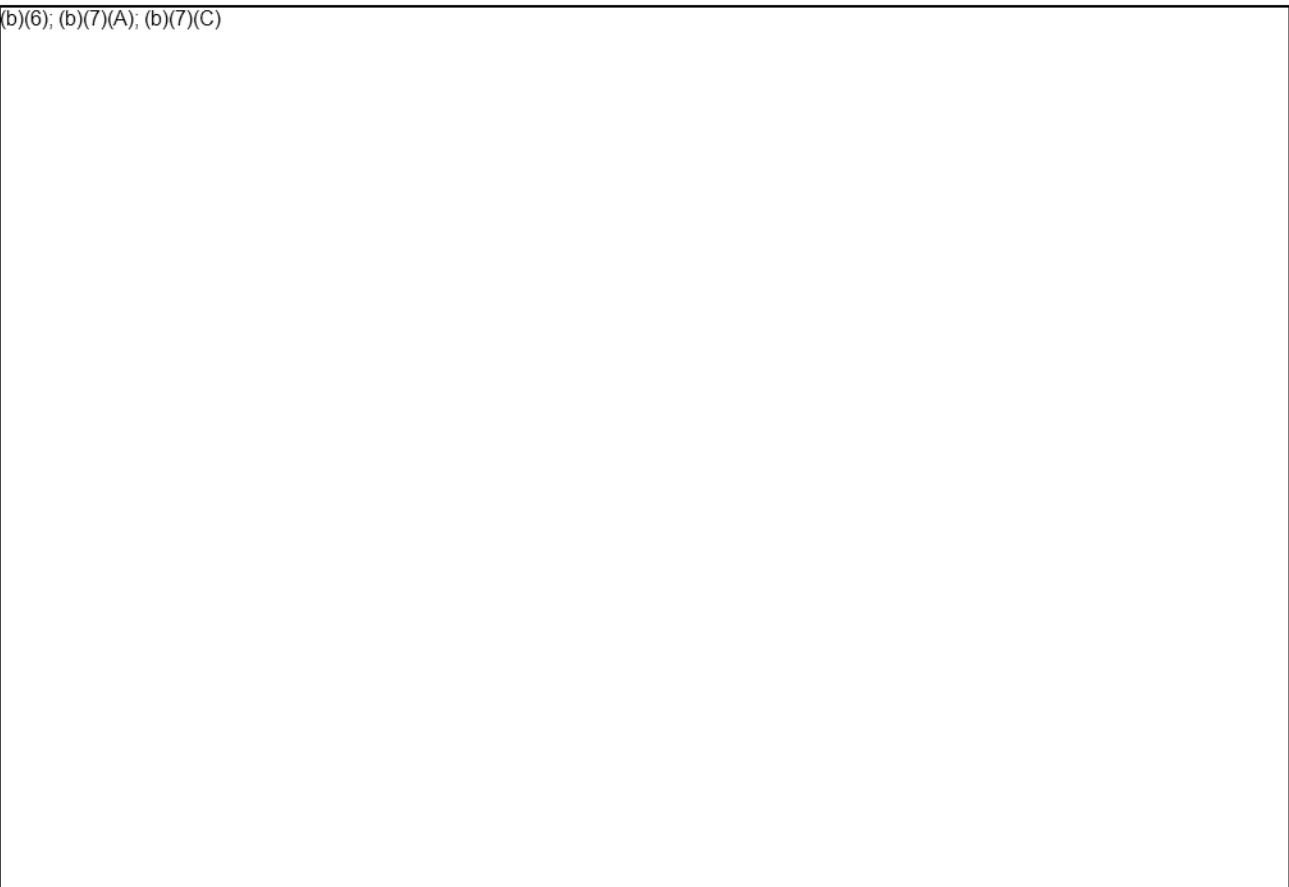


Exhibit G

The screenshots show messages from several Instagram accounts, with most content redacted. The messages are as follows:

- Top Left:** A message from 'The Adjmi Group' (@tagdevelopment) at 10:09 AM. The message reads: "Hey Jew hater just name a time and a place or I can come to you just lmk but you have already been doxxed 🖕 (b)(6); (b)(7)(A); (b)(7)(C)". Below it, a message from the same account at 2:16 AM says: "We're coming to get you."
- Top Middle:** A message from 'stopfakenewss' (@stopfakenewss) at 1:37 PM. The message reads: "(b)(6); (b)(7)(A); (b)(7)(C) Instagram (b)(6); (b)(6); (b)(7)(A); (b)(7)(C)". Below it, a message from the same account at 2:16 AM says: "We're coming to get you."
- Bottom Left:** A message from 'The Adjmi Group' (@tagdevelopment) at 1:13 PM. The message reads: "(b)(6); (b)(7)(A); (b)(7)(C) Instagram (b)(6); (b)(6); (b)(7)(A); (b)(7)(C)". Below it, a message from the same account at 2:14 AM says: "(b)(6); (b)(7)(A); (b)(7)(C)".
- Bottom Middle:** A message from 'stopfakenewss' (@stopfakenewss) at 9:50 PM. The message reads: "(b)(6); (b)(7)(A); (b)(7)(C) Instagram (b)(6); (b)(6); (b)(7)(A); (b)(7)(C)". Below it, a message from the same account at 10:09 PM says: "(b)(6); (b)(7)(A); (b)(7)(C)".

Each message includes a "View Profile" button and "Block", "Delete", and "Accept" buttons at the bottom.

Exhibit H

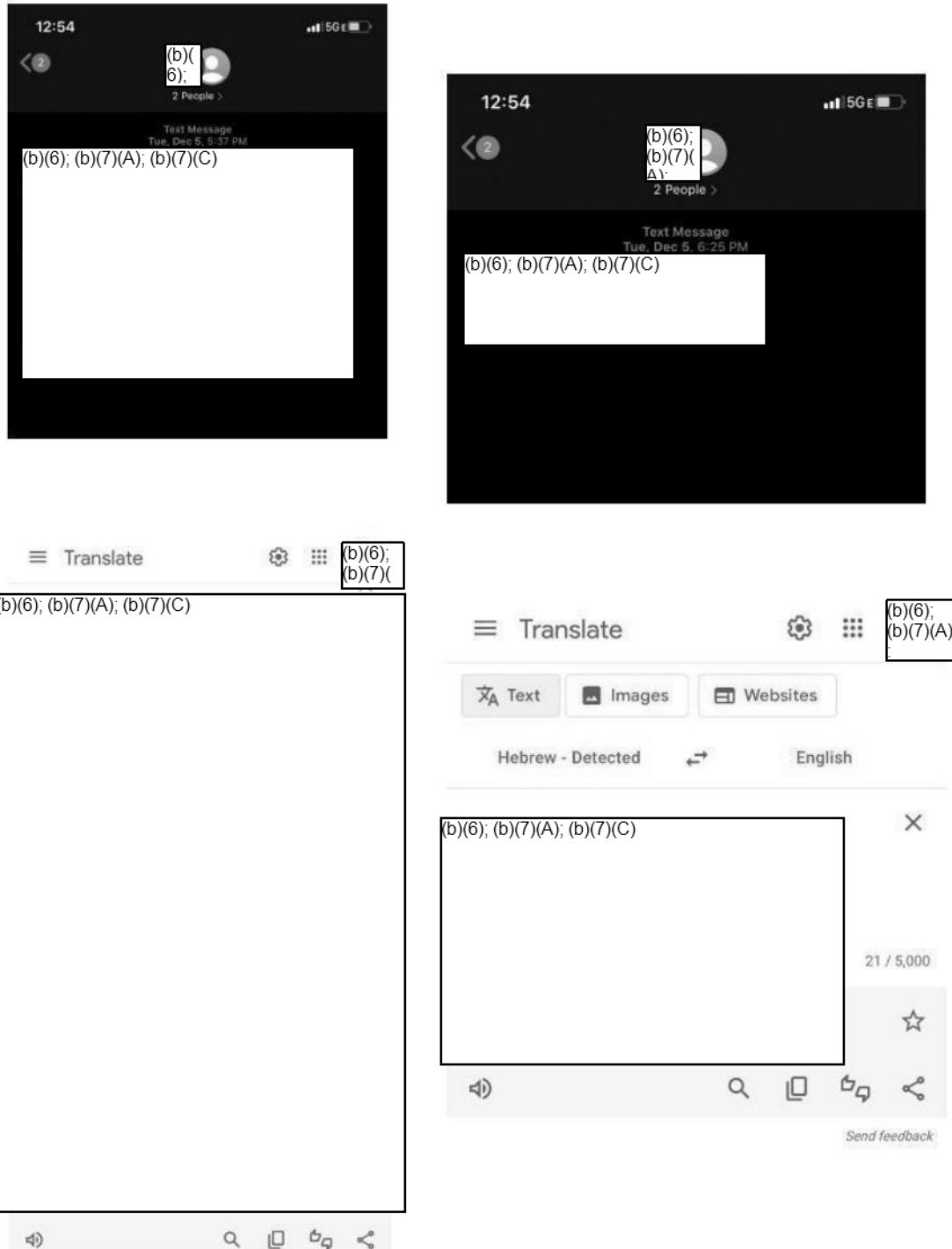


Exhibit I

A “CREDIBLE THREAT” UNRAVELED BY THE QUEENS COLLEGE COMMUNITY



studentstogetherair and cuny4palestine ...

studentstogetherair Part 1

After a bomb threat on February 22nd circulated Queens College, the administration has left the community in the dark about the results of its investigation. As the administration refuses to acknowledge the transparent Islamophobia of the original threat, leaving the QC Muslim community in a state of anxiousness, we take a look at how the past few months have led to this incident.

Part 2 is up on our profile if you want to read testimonials from the Queens College community about their thoughts on this incident. Full statement in the link in our bio.

5w

Heart icon, Comment icon, Share icon, Save icon

609 likes

February 28

Log in to like or comment.

Exhibit J

(b)(6); (b)(7)(A); (b)(7)(C)

Exhibit K

From President Frank H. Wu:

It has been brought to our attention that there were social media posts yesterday by a QC student organization, "QCMSA," that deny the brutal actions and atrocities committed by Hamas on October 7, 2023 and excuse the kidnapping of civilians, including children, the elderly, women, and men. Queens College strongly denounces such obviously false and misleading posts that in no way represent the views of Queens College. This behavior is contrary to our community values.

While we respect and uphold freedom of speech, this same right includes our condemnation of the denial included in these posts of the obvious atrocities that occurred on October 7. We will not hesitate to denounce what is so deeply hurtful, offensive, and damaging.

The Office of Compliance & Diversity is conducting a thorough review and investigation of these matters. Following findings, those who are found to be in violation of policy may be subject to sanction and/or disciplinary action. We have contacted and will continue to cooperate with the NYPD regarding these incidents.

We urge all the Queens College community to respectfully engage in civil dialogue and factual discourse, consistent with college and university policies as well as governmental laws. We will continue to provide opportunities through programs and forums, as an institution of higher education committed to the pursuit of inquiry.

My responsibility is to protect the members of our institution. We will continue to communicate candidly and promptly.

Exhibit L

StopAntisemitism 
@StopAntisemites

BREAKING: credible bomb threat at Queens College (CUNY) via email, signed "Inshallah, Allahu Akbar"

All classes have gone remote for the remainder of the day.

You forwarded this message on Thu 2024-02-22 12:29 PM

samsepon@proton.me
To: QNS Admissions: QNS QC-GADM

* This email originates from a sender outside of CUNY.
links and attach

Whoever is reading this: I lost item yesterday.
But it will explode today on campus, by 3:30.

Inshallah, Allahu Akbar

Sent from Proton Mail mobile

QNS Admissions
To: QNS Public-Safety

Timeline

- 2 mins ago
Updates from users stated there may be a planned evacuation at 3. It's unclear if this is a confirmed threat. Police have responded to the area.
- 3 mins ago
Are you nearby? Go live and help fill people nearby in on details.
- 13 mins ago
Authorities are responding to a bomb threat at Queens College. A planned evacuation at 2:30 is in place.

3:46 PM · Feb 22, 2024 · 95.9K Views

431 Reposts 37 Quotes 1,352 Likes 52 Bookmarks

Exhibit M

A ‘credible threat’ Unraveled by The Queens College Community

On Thursday, February 22nd, prior to 12:29 PM, an email was sent to QNS Admissions at Queens College that contained a bomb threat. The email stated, “Whoever is reading this: I lost item yesterday. But it will explode today on campus, by 3:30. Inshallah, Allahu Akbar”

QNS Admissions forwarded the email to Public Safety at 12:29 PM, but many students learned of the threat through the app ‘Citizen’ at around 2:30 PM. Queens College sent a CUNY alert to the students and faculty at 2:51 PM stating classes for the day will be remote “due to a credible threat.”

In the past few months, the Queens College Muslim Student Association has faced numerous attacks from the administration and the students. President Frank Wu called an NYPD investigation on his own students over instagram posts in Fall 2023, inviting a plethora of Islamophobic hate^{1,2}. Since Oct. 7, Muslim students have been called terrorists on campus, and Muslim sisters have been harassed and followed for wearing hijab. Outsiders have walked into campus during pro-Palestine demonstrations to spit Islamophobic vitriol at Muslims³. In the Student Union building where QCMSA and QC Hillel have rooms across from the hall from each other, a security guard has been stationed facing the MSA with their back to Hillel, intimidating Muslim students with police targeting and making them feel unsafe. It is proof to the community that Queens College does not support its Muslim students. The Queens College administration has created a campus that is unwelcome and dangerous to the Muslim student population. Even after a mass report of these incidents⁴, Queens College has failed to act accordingly, much less provide reparations.

Seeing Queens College has decided to leave Muslim students to fend for themselves, Islamophobes have become bolstered in their actions. Zionists have been harassing the QCMSA instagram account online with no repercussions, after MSA displayed its unwavering support for the liberation of Palestine. One Islamophobic tactic Zionists employ to distract from the Palestinian genocide is to associate anything Muslim with violence.

Antiterrorism laws in the United States have always been about targeting Palestinian livelihood and advocacy⁵. Palestine Legal and the Center for Constitutional rights recently published a briefing paper on how “foundational antiterrorism laws arose during or were adapted to pivotal moments in the Palestinian liberation struggle, often pushed by Israel-aligned groups to reflexively cast the veil of ‘terrorism’ almost uniquely on Palestinians.” Zionists have always fused Palestinian advocacy for self-determination and rights with terrorism, with the intention of using it to obscure or excuse Israel’s ethnic cleansing of Palestinians.

Exhibit N

In this case, the threat was associated with the words “Inshallah, Allahu Akbar,” which are extremely well known phrases in Muslim and Arab communities. The issue is that this statement is nonsensical. It translates to “God willing, God is great.” No Muslim says these two phrases together. The misuse of these terms alert Arabic speakers to the fact that the person who sent this email has no idea what they’re talking about. It’s clear that this person thought of words a Muslim would say daily and decided to lump them together in the hopes that people would assume the threat was truly coming from a Muslim.

Zionists want to invent an association between Muslims and violence so they can attempt to excuse Israel’s genocidal acts. Much of the Palestinian population practice Islam, a religion that has been demonized for the sake of western and imperial greed many times over. Zionists want people to believe that all Palestinians are terrorists, or will grow up to be terrorists, so that Palestinians, especially Muslims, are dehumanized so much that no one will care if they are killed, starved, and ethnically cleansed. They want to manufacture consent for genocide, just as they tried to do with the wars in Iraq and Afghanistan. But it won’t work.

Queens College has intimidated and threatened Muslim, Brown, Arab, and Black students by increasing NYPD presence on campus. Students of color cannot depend upon or lend trust to the administration. Instead, students must support each other, and faculty must show up for students now more than ever.

While Zionist groups like StopAntisemites (yet another conflation of Zionism and Judaism purposefully done to accuse all critique of Zionism as antisemitic) are using the threat to encourage Islamophobia⁶, Queens College students and faculty are rejecting this tale.

“It’s so obvious that the atmosphere that Frank Wu has created in this college is what led to someone to obviously pretend to be Muslim because how are you going to say ‘Inshallah, Allahu Akbar.’ That is so clearly the only words you know that you just taped on at the end and just were like ‘yeah this should work.’ It’s so obvious how Frank Wu and his constant enablement of Zionists on campus and anti-Muslim and Islamophobic rhetorics on campus has led to this. If he took actual initiative in protecting the Muslim students on campus, then you wouldn’t have people feeling so comfortable making dumb jokes like this. It’s just really stupid because as a Muslim, when I read the ‘Inshallah, Allahu Akbar’ I literally laughed. My body did a screenshot and I started laughing because what? I know a lot of other Muslims on campus are feeling the same. It really is reminding me of the post 9/11 Muslim hate that we all grew up with.”

—QC Student

“After seeing what the bomb scare message actually was, there’s no doubt in my mind that this was an attempt to incite paranoia against my Muslim classmates.”

Exhibit O

—QC Student

“To be completely honest, it’s mortifying to see such a horrific scare tactic used by racist pro-genocide oppressors to try to silence and repress the push for a free Palestine on-campus, and I especially feel an infinite sorrow and pain for my Palestinian, Arab, Brown, and Muslim peers within the pro-Palestine movement in Queens College who are likely to face more harassment and violence than ever all because of a staged, baseless ‘threat’ designed to repress anti-genocide voices just as they had in the 2000’s. It’s important to remember, despite this, that we have to stay hopeful, to keep going, and to use whatever voice and privilege we have, no matter how big or small, to keep pushing for a permanent ceasefire and the liberation of Palestine once and for all.”

—QC Student

“When I first heard about the incident on campus, I initially thought it was an active shooter situation. It felt almost surreal to realize that I felt less threatened when I heard it was a bomb threat. With a bomb threat, there’s a 50/50 chance it could be real, but with a school shooter, there’s no doubt they are there and dangerous.”

—QC Student

“It’s a blatant attempt at getting the community to think of Muslims as violent, to isolate the Muslim students on campus even further. It won’t work. We’ll stand with our Muslim community members—no bad attempt at fear mongering is going to shift our stance.”

—QC Student

“I have not much else to say, this is both the most blatant and the least convincing attempt on the reputation of not just the muslims of Queens College, but in general, I have ever seen. Whoever came up with this should be ashamed of themselves.”

—QC Student

“And coming at a time when the NYPD is attacking Palestine solidarity actions—which can be seen in the WOL report on NYPD and the new Pal Legal/CCR report. The key point here is that this fake threat is typical zionist distraction—trying to invent an association of violence with Muslims when we can all see Israel proudly committing the most horrific violence and cruelty imaginable against Palestinians every minute of every day while bragging about it and telling us they are doing it in the name of Judaism (over the vehement objections of many Jews!).”

Exhibit P

— QC Faculty Member

“Pathetic attempt by genocide supporters to paint Muslims as violent & divert attention from the horrific violence that Israel inflicts on Palestinians all day every day. By calling in NYPD to ‘investigate’ Muslim students over an Insta post, QC pres Wu set the stage for this hoax.”

—QC Adjuncts Unite

“Schools must take seriously any threat to its students’ lives. Queens College did not evacuate its campus until 2:30, but reports of a bomb threat spread instantly. There are clear discrepancies in which acts of violence warrant investigation and how they are managed. Surely it would be a consideration in their bungled emergency response that without any urgency to investigate and in the absence of any information but “bomb,” Muslim students would be scapegoated. It was a consideration for the students in MSA, already living under scrutiny, only the most recent targets in CUNY’s long and disgraceful history of welcoming NYPD surveillance and intimidation.

“At 4:08pm, a Twitter account with over 300,000 followers followed suit, sharing a screenshot from the QC MSA group chat reminding students of their legal rights, as well as a cellphone photo of what was allegedly the email that contained the threat, entirely vague and littered with nonsensical Arabic. It has not been officially confirmed as the email in question, but the attempt on Muslim students’ lives is there regardless. Is this violence not worthy of your response?”

—QC Alum

Exhibit Q

References

- ¹ [QCSJP's Response to President Frank Wu](#)
- ² Amir Khafagy, [Queens College and NYPD investigate Muslim Student Association's Instagram Post](#). Documented NY. 2024
- ³ [@QCSJP Instagram video](#)
- ⁴ [@QCSJP Instagram post](#)
- ⁵ Pal Legal, CCR. [Anti-Palestinian to the Core: The Origins and Growing Dangers of U.S. Antiterrorism Law](#). 2024.
- ⁶ [@StopAntisemites twitter post](#)

Exhibit R

(b)(6); (b)(7)(A); (b)(7)(C)

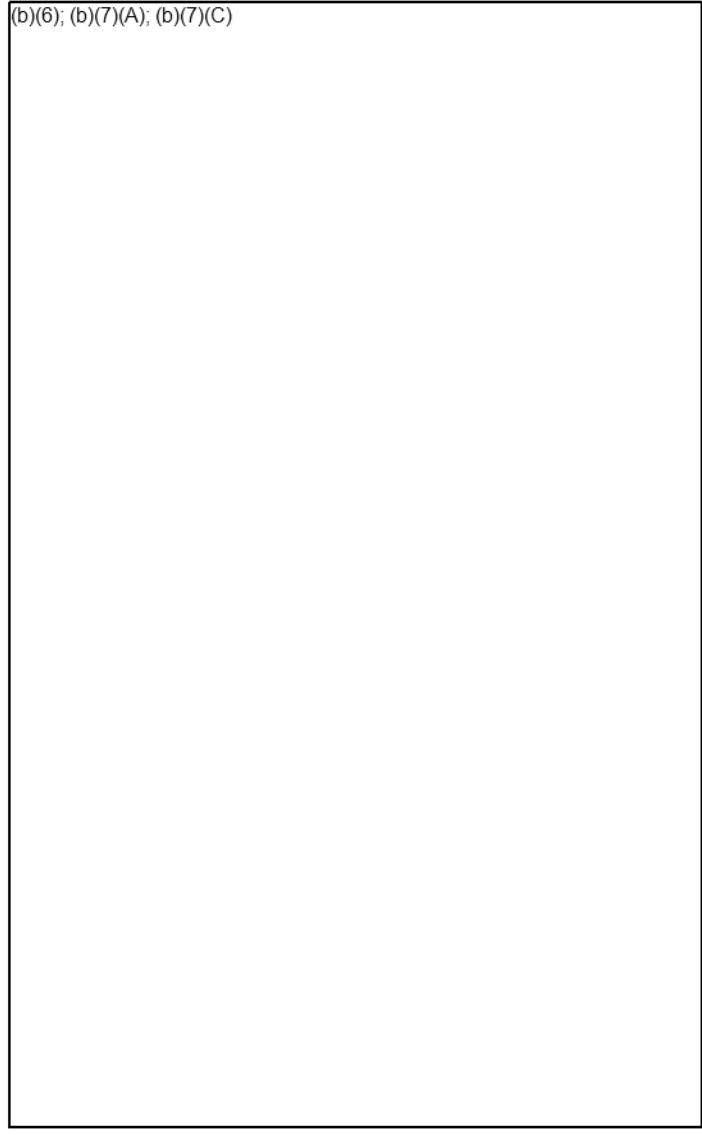


Exhibit S

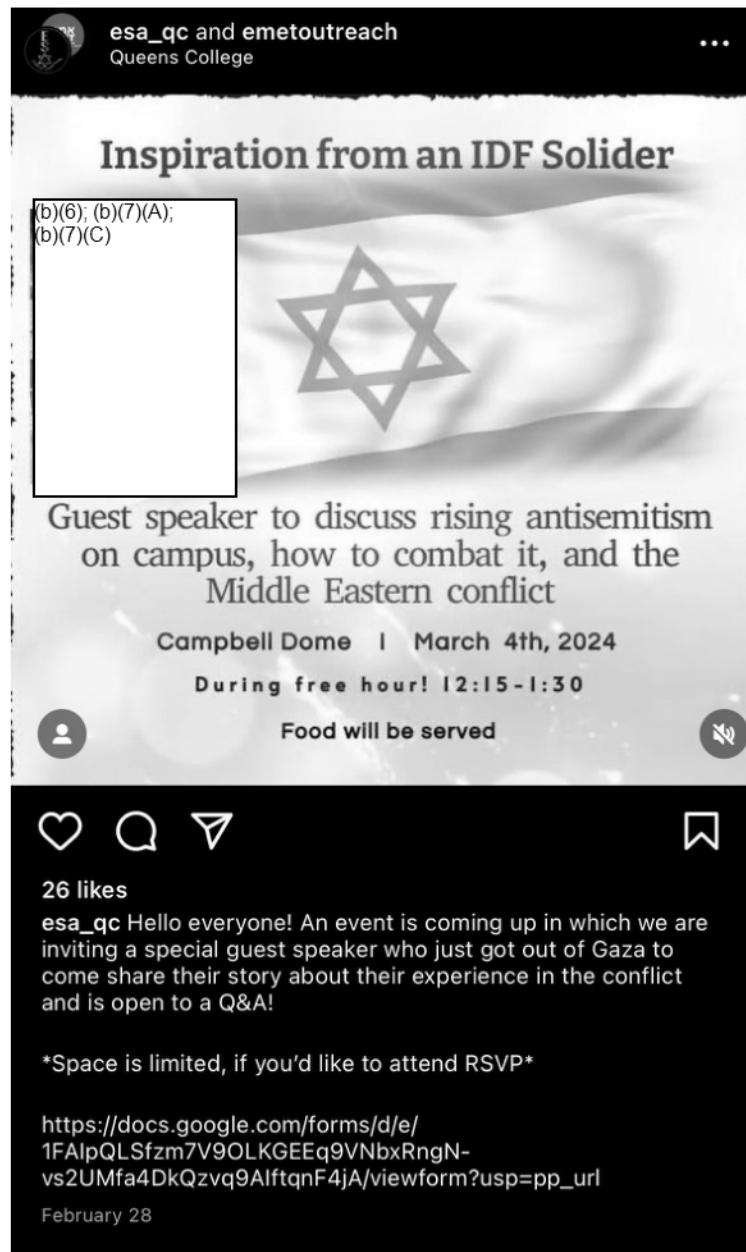


Exhibit T

Feel free to copy and paste this template to express your concern with the Queens College administration's enabling of genocide. You are welcome to make adjustments!

If you do use this template, please let us know [@studentstogetherair](#) on instagram. We would appreciate it as we want to have an idea of how many people are using this template. You can also CC or BCC us in your email, studentstogetherair@gmail.com. Thank you!

Subject: URGENT ACTION NEEDED - Revoke the Invitation of Militants from the IOF on campus to Ensure Safety of Students, Faculty, and Staff at QC.

Send to: president@qc.cuny.edu, jennifer.jarvis@qc.cuny.edu, jerima.dewese@qc.cuny.edu

Dear Administration,

I am writing to express concerns about the safety of QC students, faculty, and staff on campus.

It has come to my attention that militants from the IOF (Israel Occupation Forces) have previously been invited to speak on campus, and another has been invited to speak at the Campbell Dome on **Monday, March 4th**.

Allowing representatives of a military force that are responsible for the genocide of the Palestinian people to be present on campus not only jeopardizes the well-being of students and staff, but also enables the violence that has targeted Palestinian, Arab, Muslim, and other marginalized communities at Queens College as well as campuses across New York.

The IOF has a record of human rights abuses and [violations of international law](#), particularly in its treatment of Palestinian civilians. There are Palestinians on campus who are **YOUR** students who have had family members detained, violated, robbed, and killed by the IOF. With absolutely no consideration of these students, you are allowing in facilitators of genocide and apartheid that have perpetrated hate of the highest degree.

The IOF has also attacked college students in the past. I remind you of the [chemical attack](#) at Columbia University on January 19, 2024, that was conducted by previous members of the IOF. This attack **hospitalized at least 10 students**. This is the kind of violence you are welcoming at Queens College.

It is imperative that Queens College takes immediate action to revoke this invitation and implement measures that prevent similar occurrences in the future. The administration must apologize to the campus community with attentiveness to Palestinian, Arab, and Muslim students for allowing it to happen.

I look forward to your prompt and decisive action on this matter.

Sincerely,

[Your Name], [Student/Staff/Faculty/Alumni/CUNY or Queens Community Member]

Exhibit U



(b)(6); (b)(7)(A); (b)(7)(C)

URGENT ACTION NEEDED - Revoke the Invitation of Militants from the IOF on campus to Ensure Safety of Students, Faculty, and Staff at QC

To: <president@qc.cuny.edu> [REDACTED] <jerima.dewese@qc.cuny.edu>
Bcc: [REDACTED] [REDACTED] [REDACTED]

Mon, Mar 4 at 11:39 AM

Dear Administration,

I am a QC alum writing to express concerns about the safety of QC students, faculty, and staff on campus.

It has come to my attention that militants from the IOF (Israel Occupation Forces) have previously been invited to speak on campus, and another has been invited to speak at the Campbell Dome on **Monday, March 4th**.

Allowing representatives of a military force that are responsible for the genocide of the Palestinian people to be present on campus not only jeopardizes the well-being of students and staff, but also enables the violence that has targeted Palestinian, Arab, Muslim, and other marginalized communities at Queens College as well as campuses across New York.

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I look forward to your prompt and decisive action on this matter.

Sincerely,

[REDACTED]
[Quoted text hidden]

Exhibit V

many students were fearful.
we hoped the school would listen to
students' concerns for safety, especially
considering the chemical attack at CU,
so we asked students, staff, faculty, and
community to email the administration.

100+ sent emails

• • • •

•

Liked by cuny4palestine and 455 others

qcsjp On Monday, March 4th students gathered to protest an IOF militant's presence on campus.

Exhibit W

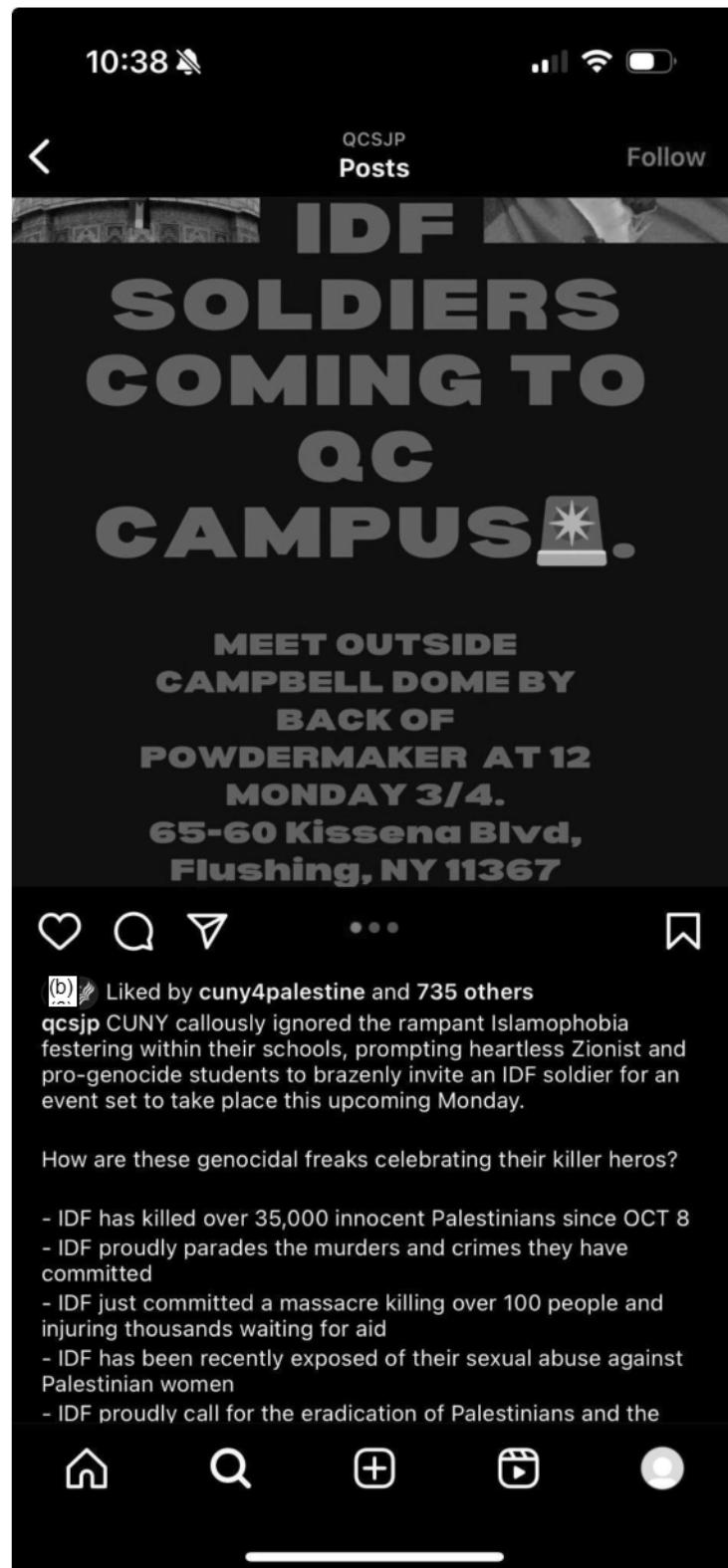
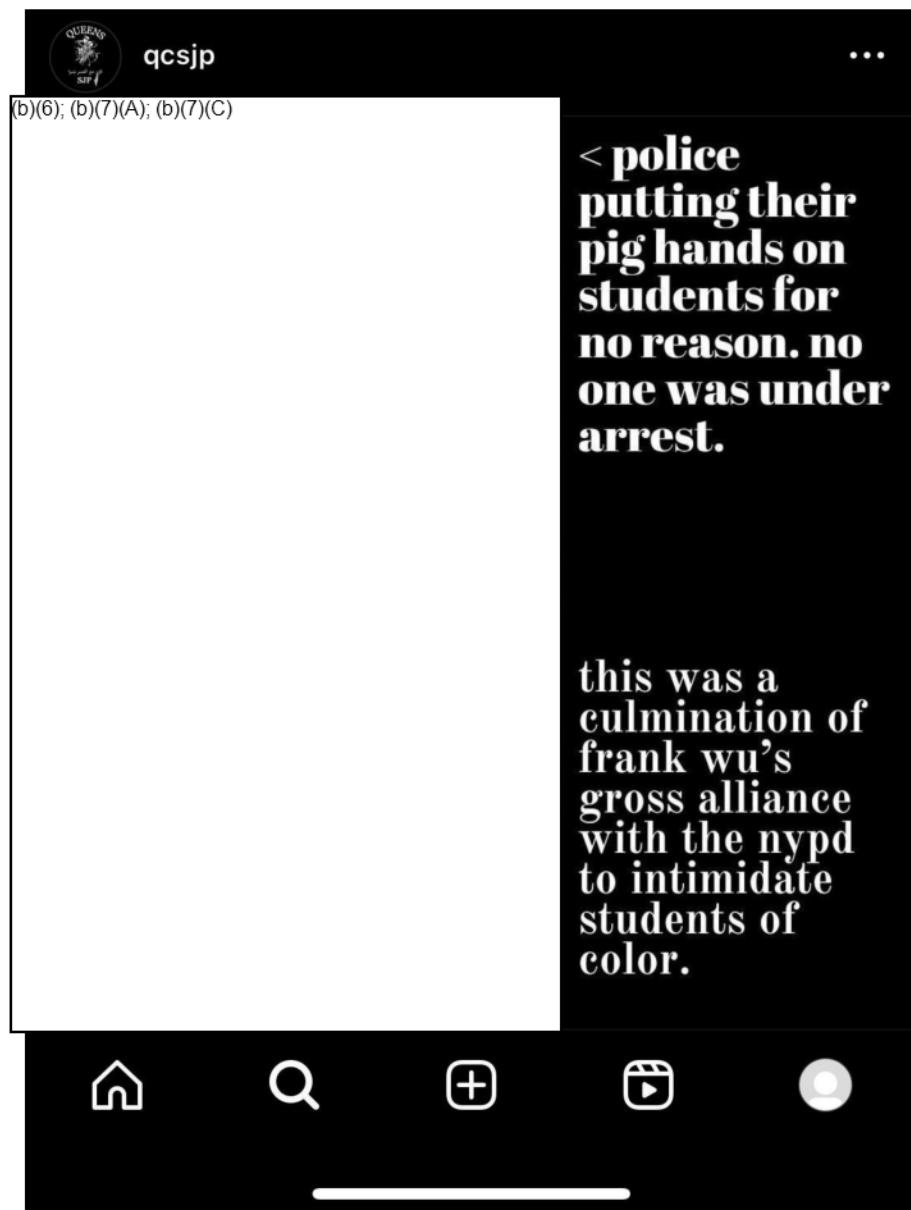


Exhibit X





UNITED STATES DEPARTMENT OF EDUCATION
OFFICE FOR CIVIL RIGHTS

26 FEDERAL PLAZA, SUITE 31 – 100
NEW YORK, NEW YORK 10278

REGION 2

NEW JERSEY
NEW YORK
PUERTO RICO
U.S. VIRGIN ISLANDS

April 24, 2024

Sent via email only to chancellor@cuny.edu; ogc@cuny.edu

Félix V. Matos Rodríguez
Chancellor
City University of New York
205 East 42nd Street
New York, New York 10017

Re: Case Number 02-24-2365 – City University of New York – Queens College

Dear Chancellor Matos Rodríguez:

On April 10, 2024, the U.S. Department of Education (the Department), Office for Civil Rights (OCR) received a complaint filed against the City University of New York – Queens College (the College) on behalf of the Queens College Students Together Against Institutionalized Racism (QC STAIR). The complaint alleged that the College has discriminated against students on the basis of their actual or perceived national origin/ethnicity (including shared Palestinian, Arab, Muslim, and/or South Asian ancestry) by failing to respond effectively to reported threats and incidents of harassment of these students by other students, faculty, and third parties at the College since October 2023; not protecting these students and not offering them supports during and following a rally hosted by these students in October 2023 or during and after related protests and counterprotests in and since October 2023, while offering other similarly situated students supports in and since October 2023; having significant police presence at and campus security surveillance of activities of students with shared Palestinian, Arab, Muslim, and/or South Asian ancestry, while not having similar presence at and surveillance of activities of other students since October 2023.

OCR enforces Title VI of the Civil Rights Act of 1964 (Title VI), as amended, 42 U.S.C. §§ 2000d-2000d-7, and its implementing regulations at 34 C.F.R. Part 100, which prohibit discrimination on the bases of race, color, and national origin (including shared ancestry) in programs and activities receiving federal financial assistance from the Department. As a recipient of federal financial assistance from the Department, the College is subject to Title VI and its implementing regulations.

OCR will investigate the following issue: (1) whether the College responded in a manner consistent with the requirements of Title VI to alleged harassment of students based on actual and/or perceived national origin/ethnicity (including shared Palestinian, Arab, Muslim and/or South Asian ancestry); and (2) whether the College violated Title VI by engaging in disparate treatment of students based on their actual or perceived national origin/ethnicity (including shared Palestinian, Arab, Muslim, and/or South Asian ancestry).

The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.

Please understand that opening these issues for investigation under Title VI does not mean that OCR has made a decision about the merits. During the investigation, OCR is neutral; OCR will collect and analyze the relevant evidence from the complainant, the recipient, and other sources, as appropriate. OCR will ensure that its investigation is legally sufficient as required by OCR's Case Processing Manual (CPM) (July 18, 2022). You may find additional information in OCR's Complaint Processing Procedures. Individuals who file complaints with OCR may have the right to file a private suit in federal court whether or not OCR finds a violation.

OCR may close this case prior to making formal findings of compliance or non-compliance, provided that the circumstances or information gathered establishes an administrative or other basis for resolution in accordance with the CPM. For example, under Section 201(b) of OCR's CPM, if both parties are interested and OCR determines that the individual allegations are appropriate for mediation, the parties may voluntarily resolve these complaint allegations through mediation that OCR will facilitate. Note that in such a case, OCR does not monitor or enforce the agreement reached between the parties.

When appropriate, a complaint may be resolved before the conclusion of an investigation after the recipient expresses an interest to OCR to resolve the complaint. In such cases, OCR obtains a resolution agreement signed by the recipient. This agreement must be aligned with the complaint allegations or the information obtained during the investigation, and it must be consistent with applicable regulations.

To reach an efficient and timely resolution of this matter, OCR is providing an opportunity for the College to present its response to the Complainant's allegation and to submit supporting documentation. **Within 20 days of the date of this letter**, please provide to OCR the information listed in the attached data request. The regulation implementing Title VI, at 34 C.F.R. §§ 100.6(b) and (c), requires that a recipient of federal financial assistance make available to OCR information that may be necessary for it to determine whether a recipient is in compliance with the regulations it enforces. Pursuant to 34 C.F.R. § 100.6(c) and 34 C.F.R. § 99.31(a)(3)(iii), of the regulation implementing the Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. § 1232g, OCR may review personally identifiable records without regard to considerations of privacy or confidentiality. OCR will take all proper precautions to protect the identity of any individuals named in the documents.

Please be advised that the College must not harass, coerce, intimidate, discriminate, or otherwise retaliate against an individual because that individual asserts a right or privilege under a law enforced by OCR or files a complaint, testifies, assists, or participates in a proceeding under a law enforced by OCR. If this happens, the individual may file a retaliation complaint against the District with OCR.

Under the Freedom of Information Act (FOIA), it may be necessary to release this document and related correspondence and records upon request. If OCR receives such a request, it will seek to protect, to the extent provided by law, personally identifiable information that, if released, could reasonably be expected to constitute an unwarranted invasion of personal privacy.

If you have any questions, please contact David Krieger, Senior Compliance Team Attorney, at (646) 428-3893 or david.krieger@ed.gov; or Sandy Araj, Compliance Team Attorney, at (646) 428-3879 or sandy.araj@ed.gov.

Sincerely,

(b)(6); (b)(7)(A); (b)(7)(C)

Eboné Luciano
Compliance Team Leader

Attachment

Data Request

Case Number 02-24-2365

City University of New York, Queens College (the College)

OCR requests that this information reach our office within **20 days from the date of the attached letter, which is May 14, 2024**. If any of the required items are available to the public on the Internet, you may provide the website address. While OCR prefers electronic submissions, you may send documents by any of the following means:

SharePoint: OCR may create an external sharing site through a browser-based portal in which the requested documents and information may be uploaded. Please contact David Krieger and Sandy Araj to receive online portal information to upload data.

Email: David.Krieger@ed.gov; Sandy.Araj@ed.gov

Fax: (646) 428-3843

Please do **not** provide the information via an electronic cloud format such as Google Docs. Because email is not reliably secure, please do not email any document that contains personally identifiable or private information without first encrypting this information. You may upload this information using the SharePoint option described above.

Please do not include Social Security numbers in your responses. If any responsive documents or data contain Social Security numbers, please redact them before sending OCR the information.

Preservation of requested and relevant data and documents: OCR may request supplemental data and documents that are relevant to the allegation under investigation. To ensure that OCR can assess the College's compliance with the statutory and regulatory obligations at issue in this investigation, please ensure that College employees preserve the data and documents requested below for the time frame specified in these requests and going forward until OCR closes this case. Please also ensure that College employees preserve other data and documents that are relevant to the allegation(s) under investigation until OCR closes this case. The regulation implementing Title VI, at 34 C.F.R. §§ 100.6(b) and (c), requires that a recipient of federal financial assistance make available to OCR information that may be pertinent to reach a compliance determination.

RESPONSE DUE: May 14, 2024

Please provide the following information for academic year 2023-2024, unless otherwise indicated, or indicate in writing if any of the requested items do not exist:

1. Provide a narrative response to the issue(s) OCR is investigating and a copy of any documents or data relied upon in the narrative or supporting the facts stated in the narrative.
2. Indicate whether the allegations raised in Case Number 02-24-2365 are pending elsewhere. If so, please provide a copy of the complaint filed and indicate the status of the complaint. If it is not possible to provide a copy of the complaint, please indicate the allegations raised in the other complaint and the forum in which the complaint was filed (e.g., another federal, state, or local civil rights enforcement agency, through the College's internal grievance procedures, or in state or federal court).
3. Copies of the College's policies and procedures, and/or a description of the College's practices, governing the investigation of complaints or incidents of harassment of and other discrimination against students on the basis of national origin/ethnicity, including shared ancestry. Provide a detailed description of the complaint process, including each level of the process, the length of the process, and the types of records maintained. Also provide the name(s) and job title(s) of College staff responsible for handling complaints of discrimination, including harassment, on the basis of national origin/ethnicity, including shared ancestry, at each level of the process.
4. Explain how the College informs students and employees of the policies and procedures set forth in Item 3 above. Submit copies of all materials disseminated, or links to the College's website. Also provide the name(s) and job title(s) of the individuals responsible for implementing the policies and procedures.
5. Copies of the College's policies and procedures, and/or a description of the College's practices, governing:
 - a. disciplinary or corrective actions that may be taken to address harassment of and other discrimination against students on the basis of national origin/ethnicity, including shared ancestry; and
 - b. the provision of supports and remedies to students, employees, and other individuals found to have been discriminated against/harassed on the basis of national origin, including shared ancestry.
6. Copies and/or descriptions of all formal and informal oral and written reports and complaints of harassment and other discrimination based on national origin/ethnicity, including shared ancestry. For each report/complaint/incident, please provide:
 - a. the name(s) and job title(s) of the person(s) to whom the report/complaint was made, and the date the report/complaint was made;
 - b. the name and relation to the College of the person making the report/complaint (e.g., student, faculty members, parent/guardian, counsel, member of the public);

- c. a detailed description of the report/complaint, including the name(s) of the alleged target(s) of discrimination/harassment and the alleged discriminators/harassers if not evident from the copy of the report/complaint;
- d. a detailed description of the grievance procedures or other complaint processing procedures employed to resolve the report/complaint;
- e. the length of the investigation and complaint resolution process;
- f. the name, national origin, ancestry, and/or ethnicity of each student, employee, or other individual involved in the alleged incident(s) of discrimination/harassment;
- g. the name(s) and relation to the College of any individual(s) who witnessed the alleged incident(s), including any College students, employees, or others;
- h. the name(s) and relationship to the College of any witnesses interviewed by the College;
- i. the name(s) and job title(s) of the individual(s) involved in the response to, investigation of, and resolution of the report/complaint;
- j. all actions the College has taken in response to the report/complaint/concerns raised, including corrective action taken, disciplinary sanctions imposed, supportive services and remedies offered and/or provided to individuals (e.g., counseling, safety measures); and/or individual and/or College-wide remedies;
- k. the final outcome of any investigation of the report/complaint, including copies of any incident/investigative reports, final determination, and any appeals;
- l. if the College did not investigate any particular report/complaint, the reason(s) for not investigating, and the name(s) and job title(s) of the person(s) who made the decision;
- m. any notice of the investigative findings provided to the complainant and/or other notice regarding the report/complaint, including notice of any outcomes on appeal; and
- n. the complete case file for the report/complaint identified, including internal emails or other correspondence, internal and external memoranda, incident/investigative reports, video and audio recordings, witness statements, logs, forms, interview notes, notes regarding remedies provided, hearing transcripts, meeting minutes, and notes generated.

7. State whether the College conducts focus groups, other meetings, or trainings, and/or holds informational sessions with students and/or staff regarding students' rights under Title VI, how to report possible violations of Title VI, and/or the College's obligation to respond to Title VI complaints. If so, provide the dates of such events, a description of the attendees, and any materials presented and/or distributed.

8. A detailed description of any training regarding discrimination, including harassment, based on national origin/ethnicity, including shared ancestry, that the College provided to College staff responsible for responding to such complaints. For each such training provide the date(s) it was delivered, a description of the training, a list of the names and job titles of the individuals who attended the training, and copies of any materials distributed during the training.

9. A copy of all College policies or procedures, and/or a description of the College's practices, related to police officer or other security personnel presence or surveillance on campus. Include the names and job titles of all College staff responsible for implementing the policies/procedures/practices by name(s) and position title(s).

10. State whether the College has increased its police officer or other security personnel presence on campus or during College-sponsored events since October 2023. If so, identify the staff involved in the decision by name(s) and position title(s), provide the date the decision was made, identify the activity, identify the entity that was present (e.g., local law enforcement, campus security), and explain why the decision was made.
11. State whether the College canceled any events of its Muslim Students Association (MSA) since October 2023. If yes, please provide:
 - a. the names of the individual(s) and their position titles who made the decision to cancel the MSA event and a description of the cancelled event;
 - b. a description for the rationale for the cancelation; and
 - c. copies of all related documentation, including, but not limited to, correspondence, minutes of any formal or informal meetings, notes, internal memoranda, emails, telephone logs.
12. State whether the College offered support, protection, accommodations, including counseling and wellness services, and/or other resources to students who felt uncomfortable or unsafe coming to campus since October 2023. If yes, please provide:
 - a. the name(s) of the students to whom the College offered such services;
 - b. the national origin, ancestry, and/or ethnicity of each student, employee, or other individual involved;
 - c. the names of the individual(s) and their position titles who made the decision to offer these services;
 - d. a description of the rationale for doing so; and
 - e. copies of all related documentation, including, but not limited to, correspondence, minutes of any formal or informal meetings, notes, internal memoranda, emails, telephone logs.
13. Copies of any public statements issued by the College and/or support at rallies, protests and/or events on or after October 7, 2023, stating support for Jewish students and/or Israeli communities.
14. Copies of all requests received by the College after October 7, 2023, requesting that the College issue a statement and/or attend rallies, protests and/or events supporting Palestinian, Arab, Muslim, and/or South Asian ancestry students and/or Palestinian, Arab, Muslim, and/or South Asian ancestry communities. For each request provide:
 - a. the date of the request (if not apparent from the request);
 - b. the name or the requestor and his/her/their relation to the College;
 - c. whether the College granted or denied the request, including the College's rationale;
 - d. a copy of the College's response to the request;
 - e. copies of any public statements issued by the College stating support for students of Palestinian, Arab, Muslim, and/or South Asian ancestry;
 - f. the names of the individual(s) and their position/titles who responded to the requests; and
 - g. copies of all related documentation, including but not limited to, correspondence, minutes of any formal or informal meetings, notes, internal memoranda, emails, telephone logs.

15. A copy of all College policies or procedures related to “*doxxing*” or the act of publicly providing personally identifiable information about an individual or organization in the College community.
16. Copies of all formal and informal reports/complaints, including records of oral reports/complaints, concerning alleged “*doxxing*” or the act of publicly providing personally identifiable information about an individual or organization in the College community. For each complaint/report, provide:
 - a. the name(s) and title(s) of the individual(s) to whom the complaint/report was made, and the date of the complaint/report;
 - b. a detailed description of the complaint processing procedures employed to resolve the complaint/report;
 - c. the name(s) and title(s) of the individual(s) involved in the handling of the complaint/report;
 - d. all actions the College took in response to the complaint/report;
 - e. the College’s final determination regarding the complaint/report;
 - f. any corrective action taken;
 - g. the length of the process; and
 - h. any notice of the findings provided to the complainant.
17. The name, job title, address, telephone number, fax number, and email address of the College’s designated contact person for this complaint.
18. Any other information the College believes will assist OCR in this investigation.