



April 5, 2024

**Emory University  
COMPL #04242178  
4/5/2024**

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*Via Email Only*

RE: Title VI Complaint Against Emory University (National Origin – Palestinian, Race – Arab, Shared Ancestry or Ethnic Characteristics – Muslim)

Dear Assistant Secretary Lhamon:

We write on behalf of Emory Students for Justice in Palestine (“ESJP”), a diverse group of students who advocate for Palestinian rights on campus and is comprised of majority Arab and Muslim members, including Palestinian members. In the months following October 7, students with ESJP have been targeted by racist, anti-Palestinian, xenophobic, and Islamophobic harassment and doxing attacks, by fellow students and faculty, among others. Despite repeated notice, including formal complaints and a January 24 letter detailing nearly all of the below-

mentioned incidents, Emory University (“Emory”) has been extremely slow to take action, instead stonewalling and exacerbating the hostile environment by engaging in its own anti-Palestinian actions, subjecting its Palestinian, Arab, and Muslim students to different treatment, censorship, and false accusations of antisemitism.

Based on the facts described here, we urge you to investigate Emory for violating its obligations under Title VI of the Civil Rights Act of 1964.

## **I. STATEMENT OF FACTS/BACKGROUND**

ESJP, Palestinian students, students perceived to be Palestinian, students associated with Palestinians, and Arab and Muslim students on Emory’s campus have been severely and persistently harassed by faculty, other students, alumni, and even parents in the wake of October 7, 2023.

### **A. Emory Students, Parents, Faculty, and Outsiders Have Repeatedly Harassed Emory’s Palestinian, Arab, and Muslim Students.**

- Since October 9, 2023, ESJP has received several hateful comments, tags, and direct messages from non-Emory affiliates on their social media platforms. They have been called Hamas supporters, fake Muslims, and have been sent graphic photos, such as photos that were purported to be of an Israeli woman who had been sexually assaulted and a burned Israeli child – both of which have been proven to be fake.<sup>1</sup> Students felt that these messages attempted to paint all Palestinians as terrorists and/or violent and responsible for October 7. This was reported to Emory via the University’s bias reporting process. Emory failed to respond about how they would or would not address this incident.
- On October 16, 2023, a Muslim student was walking to the shuttles at Emory when she overheard a girl behind her loudly telling her other friend that her cousins kept making crazy jokes and said, “They keep saying we need to kill all the Palestinians.” Both friends then started laughing, though the girl later clarified that is not what she personally was going for. This was reported to Emory via the University’s bias reporting process. Emory failed to respond about how they would or would not address this incident. Hearing this kind of racist, anti-Palestinian rhetoric on campus made the student feel unwelcome and unsafe on campus. It made her scared to disclose her ethnicity to people she did not know and scared to voice her opinions. Her parents became paranoid, seeing this incident amidst the rise of Islamophobic and anti-Palestinian hate crimes, and advised the student not to attend Muslim or Arab-related events, fearing there could be an attack and that their daughter could be harmed.

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<sup>1</sup> See Exhibit 1.

- On October 25, 2023, multiple student groups organized a Stop Cop City protest<sup>2</sup> at Emory. At the protest, some students chanted “From the River to the Sea, Palestine Will be Free,” a statement calling for freedom and equality for everyone living in historic Palestine. (b)(6); (b)(7)(A); (b)(7)(C) a current student at Emory and the (b)(6); (b)(7)(A); (b)(7)(C) (b)(6); (b)(7)(A); (b)(7)(C) posted on X (formerly Twitter) accusing students affiliated with ESJP as “militant students calling for genocide of Jews from the river to the sea.”<sup>3</sup> In fact, (b)(6); (b)(7)(A); (b)(7)(C) called every student who attended the protest a “militant.”<sup>4</sup> These allegations of violence against ESJP, a group made up of majority Arab and Muslim students, who are advocating for the rights of Palestinians, are based on racist stereotypes of Palestinians, Arabs, and Muslims as inherently violent and dangerous. She also called on Emory University to disband ESJP. Her activity on X has relied on Islamophobic tropes. This was reported to Emory via the University’s bias reporting process. Emory failed to respond about how they would or would not address this incident. Emory has taken no known action against the offending student.
- At the same protest, (b)(6); (b)(7)(A); (b)(7)(C) and several other students recorded the protesters. Video footage of the protesters was then posted on the Israel War Room Instagram account, an online group that has been known to dox and harass those who speak out for Palestine and that has collaborated with Emory Eagles for Israel on at least one social media post. The video sent to Israel War Room showed protesters and included the heading: “Pro-Hamas students want to wipe Israel off the map” and a caption that suggested the students were advocating for Jews to be “slaughtered until there are none left.”<sup>5</sup> This is bigoted anti-Palestinian rhetoric that suggests that equality for Palestinians means slaughtering of Jews. (b)(6); (b)(7)(A); (b)(7)(C) who is Muslim and Arab and who spoke at the protest calling attention to the number of Palestinian children killed in Gaza as of October 7, 2023, was shown in the video that labeled protesters as Hamas supporters. This was reported to Emory via the University’s bias reporting process. Emory failed to respond about how it would or would not address this incident. (b)(6); (b)(7)(A); (b)(7)(C) was offered no support, nor did Emory condemn the racist anti-Palestinian hate speech and stereotyping of students perceived to be Palestinian by anti-Palestinian students. After the Stop Cop City protest, many students who supported Palestinian rights, were affiliated with Palestinians and/or perceived to be Palestinian felt terrified and uncomfortable going to protests advocating for Palestinian rights because they were concerned they too would be the target of a bigoted anti-Palestinian social media campaign which stereotypes supporters of Palestinian rights as supporting Hamas.
- After the October 25 Stop Cop City Walk Out, ESJP students have received extreme hate online for the event, though ESJP did not sponsor it. These hateful posts came from

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<sup>2</sup> Stop Cop City is a protest movement aiming to stop the construction of a new police training center, which would be the largest in the US, in a forest outside of Atlanta. ESJP did not organize this protest.

<sup>3</sup> See Exhibit 2.

<sup>4</sup> Id.

<sup>5</sup> See Exhibit 3.

(b)(6); (b)(7)(A); [REDACTED] an Emory alumnus, Stop Antisemitism (Instagram Page), and Israel War Room (Instagram Page), in addition to (b)(6); (b)(7)(A); (b)(7)(C)

(b)(6); (b)(7)(A); (b)(7)(C) [REDACTED] who labeled students calling for Palestinian equality and chanting “from the river to the sea” – “pro-murder, pro-rape, pro-torture, pro-abduction.”<sup>6</sup> This has been reported to Emory via the University’s bias reporting process. Emory failed to respond about how they would or would not address this incident.

- In October 2023 (exact date unknown), (b)(6); (b)(7)(A); [REDACTED] mother of anti-Palestinian Emory student (b)(6); (b)(7)(A); [REDACTED] commented on (b)(6); (b)(7)(A); [REDACTED] LinkedIn post and said they must call on the mayor of Atlanta to arrest Emory students who showed their support for Palestinian rights.<sup>7</sup> She also falsely accused supporters of Palestinian rights of antisemitism and stated that all such students’ names must be publicly exposed. This has been reported to Emory via the University’s bias reporting process. Emory failed to respond about how they would or would not address this incident.
- On October 23, 2023, an Arab student who is a member of ESJP and Emory’s Arab Cultural Association stepped into the elevator of (b)(6); (b)(7)(A); (b)(7)(C) a building where they work as a (b)(6); (b)(7)(A); (b)(7)(C) [REDACTED] The (b)(6) student was with their roommate when another person in the elevator looked at the (b)(6) [REDACTED] student’s headband and hoodie that read “Arab Cultural Association.” The person glanced at his friend, nudging him to stare at the (b)(6) student. The person then stated, “There is a lot of hate in America,” took a deep breath, and then stated again, “There is a lot of hate in America...towards Jewish people.” The person then clenched his fist and whispered, “oh my god,” as the (b)(6); (b)(7)(C) student left the elevator. Because the (b)(6); student (b)(6); [REDACTED] worked in the building, they knew that the person who made the racist statement did not (b)(6); [REDACTED] in the building. The (b)(6) student’s face, name, and contact information are all over (b)(6); (b)(7)(A); [REDACTED] as they are a student employee in the building. This was reported to Emory via the University’s bias reporting process. Emory failed to respond about how they would or would not address this incident. After this incident, the (b)(6) student wore less clothing and accessories that showed their Arab heritage. They stopped wearing headbands and keffiyehs (traditional Palestinian scarf) as part of their casual dress, which is something they had done in their first two years of college. They now feel as though they have to take measures to make themselves seem less “scary” to others. (b)(6); (b)(7)(A); [REDACTED] also made a comment about the (b)(6) student’s attire with Arabic writing, saying that they look as though they are supporting a specific Arab dictator. The (b)(6) student is now cautious of making others feel scared by donning attire with their native language. They also find it difficult to practice wearing their religious garb. During the current month of Ramadan, the holiest month in the Islamic calendar, this difficulty weighs on them.

<sup>6</sup> See Exhibit 4.

<sup>7</sup> See Exhibit 5.

- On October 26, 2023, an Emory student posted a question on an anonymous social media platform used by Emory students, known as Fizz, that suggested he would physically harm supporters of Palestinian rights on campus. The post said, “Will I get in trouble if I fist fight anyone with a pro Palestine sign on campus.”<sup>8</sup> This has been reported to Emory via the University’s bias reporting process. This comment appeared on Fizz the day after the Stop Cop City protest, where students supporting Palestinian rights were being taunted and filmed by anti-Palestinian students. Seeing these comments on Fizz, students felt like they were in danger, and they feared that they could be physically attacked for vocally supporting Palestinian equality. Emory failed to respond about how they would or would not address this incident. Emory has taken no known action against the offending student.
- On October 26, 2023, anti-Palestinian Emory alumnus [redacted] (b)(6); (b)(7)(A); [redacted], who as noted above, posted hateful comments on social media about Emory students advocating for Palestine, called the University’s career center and asked for a list of students who attended the Stop Cop City protest on October 25. The student worker replied that they did not have the information he was requesting and directed him to call the dean’s office instead. Given [redacted] (b)(6); (b)(7)(A); past conduct and the fact that students supporting Palestinian rights were being doxed across the country, students felt that [redacted] (b)(6); (b)(7)(A); [redacted] was attempting to further dox students supporting Palestinian rights and to encroach on students’ privacy and safety. This was reported to Emory via the University’s bias reporting process. Emory failed to respond about how they would or would not address this incident. Students felt there was no one at Emory that they could reach out to in order to ensure their names were not given over to [redacted] (b)(6); (b)(7)(A); [redacted] To date, Emory has failed to publicly condemn or disseminate any statements critical of racist anti-Palestinian targeting and doxing. Parents of these students have asked their children to quiet their support for Palestinian rights due to those like [redacted] (b)(6); (b)(7)(A); [redacted] who have been targeting and harassing students, and Palestinian students, students perceived to be Palestinian, and students affiliated with Palestinians fear they will be doxed without support from Emory.
- On October 31, 2023, an Arab student of [redacted] (b)(6); (b)(7)(A); descent, went to the farmer’s market to get lunch. She ran into an old acquaintance from freshman year, who said hello and then asked, “Are you a terrorist?” She felt uncomfortable and asked him to repeat what he said. He said, “Are you a terrorist? I think all brown people are terrorists.” He then said, “Everything I say is not sarcastic. I’m not joking.” He apologized and said it was a joke, but by then the Arab student had already been made extremely uncomfortable and felt attacked by a fellow student. This has been reported to Emory via the University’s bias reporting process. Emory failed to respond about how they would or would not address this incident.

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<sup>8</sup> See Exhibit 6.

- On November 5 and November 12, 2023, Palestinian, Arab, and Muslim students, including (b)(6); (b)(7)(A); (b)(6); (b)(7)(A); and (b)(6); (b)(7)(A); put up flyers and did chalkings at different locations on Emory's campus, in accordance with Emory's open expression policy. The flyers noted the number of Palestinians killed by Israeli forces since October 7. Over the next week, the flyers were ripped out or put in the trash. The chalkings likewise listed the number of Palestinians killed since October 7 and called the ongoing Israeli onslaught against Gaza a genocide. The first time the students engaged in these chalkings, anti-Palestinian students surrounded them and tried to interfere with the chalkings in violation of Emory's open expression policy. One of the anti-Palestinian students, (b)(6); (b)(7)(A); (b)(7)(C) pretended to (or perhaps in fact did) call campus police on the Palestinian, Arab, and Muslim students, falsely accusing them of mobbing her, when she, in fact, had approached them first. The second time the students engaged in these chalkings, other students followed them around campus, and filmed them, simply for engaging in protected expression in support of Palestinian rights. Following these incidents, students felt fear, anxiety, and insecurity. They felt unsafe in their educational environment, hesitant to attend classes, participate in school activities, or even contribute to class discussion. CAIR-Georgia and Palestine Legal notified Emory of both these incidents in a January 24, 2024 letter.<sup>9</sup> Emory has taken no known action against the perpetrators.
- On March 1, (b)(6); (b)(7)(A); (b)(6); (b)(7)(A); (b)(6); (b)(7)(C) a Palestinian student and member of (b)(6); (b)(7)(A); (b)(6); (b)(7)(A); (b)(7)(C) was walking back to her dorm after attending an (b)(6); (b)(7)(A); (b)(7)(C) meeting at the Chapel. She was walking alone between the bridge in front of Calloway and the bridge near Dooley statue, wearing her hijab and bookbag with a mini keffiyeh (Palestinian scarf) on it. As she was walking, she noticed that there were four men, apparently students, who were behind her, who suddenly quieted their conversation and started whispering. (b)(6); (b)(7)(A) had a gut feeling they were talking about her. The four men, laughing and approaching near her from behind, started raising their voices as they got close to (b)(6); (b)(7)(A). They made comments about how much they love the Israeli army and the "work" that they have done and are doing, apparently referring to the tens of thousands of Palestinians that the army had killed at that point. The four men passed (b)(6); (b)(7)(A) and returned to their normal tone of conversation. (b)(6); (b)(7)(A) was left in tears. This incident occurred the day after the "flour massacre" in Gaza where Israeli forces killed over 100 Palestinians as they tried to get aid from trucks. (b)(6); (b)(7)(A) explained in her bias report to Emory, "As a Palestinian student, I can't feel safe on this campus with people openly supporting this genocide and actively harassing students like me. I have had to watch my people die every day and yet these people are proud to rub in that my people are being eliminated... It hurts and I'm so, so tired. Emory needs to do something to not give students the confidence to do such a thing to people on campus. Emory needs to call out these incidents that have kept on happening since October. Emory needs to

<sup>9</sup> Letter to President Gregory L. Fenves, Re: Anti-Palestinian and Islamophobic Environment at Emory University, CAIR-GA and Palestine Legal (Jan. 24, 2024), <https://www.cair.com/wp-content/uploads/2024/01/Emory.pdf>.

start caring about their students the way they say they care.” This incident was reported to Emory via the university’s bias reporting process, including a photo of what the four men look like from behind. Ruth Vaughan, Assistant Director of Equity Investigations at Emory, contacted (b)(6);  
(b)(7)(A) on April 1, 2024, a month after the report was filed, to discuss the incident.

- B. Emory’s Discriminatory Treatment of Emory Students for Justice in Palestine and Other Students Who Wished to Associate with Palestinians.
  - The Emory College Instagram account (@emorycollege), the official Instagram page run by Emory College of Arts & Sciences, has a clear policy to share all student-organized or student club information on its page, and they shared this policy with ESJP. The Emory College Instagram account even wrote, “If you are connected with SJP, please let us know if there is a planned event for Palestinians who were killed, or if there is a joint event.”<sup>10</sup> On October 10, 2023, when ESJP first released a statement<sup>11</sup> lamenting Palestinian lives lost on their Instagram, the Emory College Instagram account reposted ESJP’s statement on their Instagram story. However, within a few hours of reposting the ESJP statement, the Emory College Instagram account deleted that post from their Instagram page. In contrast, the Emory College Instagram account reposted other groups’ statements and kept them up for a full 24 hours. Furthermore, when ESJP member (b)(6); (b)(7)(A); requested the Emory College Instagram account to repost a Vigil for Palestine flyer, they failed to do so. They did not respond.<sup>12</sup> However, when Israeli clubs hosted a vigil on campus, the Emory College Instagram account did share that information on its page. This demonstrates a clear bias against Palestinian students and students associated with Palestinians, in violation of Title VI and Emory College of Arts & Sciences’ own policy to publish information about all student club events and activities on its Instagram page. This was reported to Emory via the University’s bias reporting process. Emory failed to respond about how they would or would not address this incident.
  - On November 11, 2023, at a bake sale organized by Arab and Muslim students to fundraise for the Palestinian Children’s Relief Fund, a humanitarian organization that provides medical assistance to Palestinian children, an Emory parent verbally accosted a visibly Black Muslim student, accusing them of supporting Hamas. When the student asked on-site Emory staff from the open expression office and the director for student involvement to intervene on the student’s behalf and stop the parent from engaging with the student, Emory staff informed the student they could not stop the verbal harassment because of Emory’s open expression policy. Emory has taken no known action to condemn this racist anti-Palestinian and Islamophobic stereotyping.

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<sup>10</sup> See Exhibit 7.

<sup>11</sup> See Exhibit 8.

<sup>12</sup> See Exhibit 9.

- On November 14, 2023, Emory's Graduate Student Government Association ("GSGA") and the undergraduate Student Government Association ("SGA") held a joint general body meeting, open to all Emory undergraduate and graduate students. On the agenda was a discussion of student government's response to student concerns in relation to Palestine/Israel. Two hours prior to this meeting, this topic was unilaterally removed at the direction of Lisa Loveall, then Director of Student Involvement, Leadership, and Transitions ("SILT") and advisor to the SGA. This was despite the SGA being notified of this agenda item first on November 6, 2023, and again on November 13, 2023. In a text message thread between GSGA (b)(6); (b)(7)(A); (b)(7)(C) SGA (b)(6); (b)(7)(A); (b)(7)(C) and Lisa Loveall, Loveall told (b)(6); that the discussion about student concerns in relation to the violence in Palestine and Israel "will not be happening tonight."<sup>13</sup> Because of Loveall's position as director of SILT, which oversees all student organizations on campus, the GSGA felt they had no choice but to withdraw the agenda item in question. As of April 5, 2024, Loveall is the Director of Open Expression at Emory. An open expression complaint was filed with the Committee for Open Expression under Emory Respect for Open Expression Policy 8.14.<sup>14</sup> Emory responded that they would look into this, but that they are "very backlogged at this time."<sup>15</sup> The complaint and this response were dated January 28, 2024. Emory sent an additional response on January 29, 2024, acknowledging receipt of (b)(6); (b)(7)(A); formal complaint.<sup>16</sup> It has been more than two months and there has been no further response from Emory.
- On February 2, 2024, ESJP organized a "A Memorial for Palestine" event, where they intended to stake flags into the ground at Emory's quad. They notified Emory of their plans at least a month prior to the event taking place. Emory waited until the week of the event to inform ESJP that staking flags in the ground was prohibited due to a "no-staking" policy, applicable from a facilities perspective, rather than an event management perspective. However, Emory's Respect for Open Expression Policy 8.14, which permits students to engage in protests or demonstrations, states that Policy 8.14 supersedes all other university policies, with exceptions outlined in Section 8.14.5.5. None of these exceptions are applicable to the act of staking flags in the ground. One of the exceptions outlined in the policy limits open expression if it may "interfere unreasonably with the general operations of the University." However, ESJP planned to remove the flags post-event. Moreover, similar signs from the Emory Admissions Office are currently displayed on the quad, in the ground, suggesting an apparent inconsistency in policy enforcement. Additionally, according to section 8.14.7.2 of the Open Expression policy, "The Committee and the DCL shall work with Protestors or Dissenters to identify ways to continue the Expression, Protest, or Dissent with modifications to avoid future violations." Despite being informed a month in advance about the event, Emory only cited the "no-staking" policy shortly before the event date and did not identify

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<sup>13</sup> See Exhibit 10.

<sup>14</sup> See Exhibit 11.

<sup>15</sup> *Id.*

<sup>16</sup> *Id.*

modifications. ESJP students had to find alternatives to staking flags in the ground themselves. On the day of the event, Lisa Loveall, Director of Open Expression, was present and refused to answer inquiries about the “no-staking” policy from (b)(6); (b)(7)(A); (b)(7)(C) (b)(6); (b)(7)(A); (b)(7)(C) despite her role as an (b)(6); (b)(7)(A); (b)(7)(C) at Emory tasked with improving the lives and education of Emory graduate students. By treating ESJP’s Memorial for Palestine differently from other similar speech activity, the university contributed to the hostile anti-Palestinian environment on campus.

C. Emory Failed to Protect Palestinian, Arab, and Muslim Students from Harassment by Alumnus (b)(6); (b)(7)(A); (b)(7)(C) and Goizueta School of Business Dean Andrea Hershatter.

- On October 9, 2023, an Emory University alumnus from Goizueta Business School, (b)(6); (b)(7)(A); (b)(7)(C) made a public post on his LinkedIn platform, calling ESJP a terror-affiliated organization, and asking Emory to expel students affiliated with ESJP. (b)(6); accusation that ESJP, an organization that advocates for Palestinian human rights and that is made up of majority Arab and Muslim members, is associated with terrorism perpetuates dangerous, racist tropes of Palestinians, Arab, and Muslims as violent. In the same post, he doxed one Emory faculty member and at least four students affiliated with ESJP, (b)(6); (b)(7)(A); (b)(7)(C) and (b)(6); (b)(7)(A); (b)(7)(C) listing their full names and tagging them in his post.<sup>17</sup> Others reposted and commented favorably on (b)(6); (b)(7)(A); (b)(7)(C) post. It was also liked by several Emory students, alumni, and faculty, none of whom have faced any consequences for supporting clearly anti-Palestinian and Islamophobic expression, in violation of Emory’s values and policies surrounding open expression. Since October 7, 2023, (b)(6); (b)(7)(A); (b)(7)(C) has openly called on the University to disband ESJP and for foreign students participating in pro-Palestine protests to be deported from the United States. Undergraduate students from Emory and their parents commented on (b)(6); (b)(7)(A); (b)(7)(C) LinkedIn posts and voiced support for his calling for ESJP students’ expulsion and the disbandment of ESJP. They also supported his claims that ESJP is a militant group made up of militant students. One doxed student explained that her LinkedIn account received hundreds of views a day due to (b)(6); (b)(7)(A); (b)(7)(C) actions. (b)(6); (b)(7)(A); (b)(7)(C) actions have been reported to Emory via the University’s bias reporting process. Please see the following two incidents for more details on Emory’s response to complaints about (b)(6); (b)(7)(A); (b)(7)(C). Students were informed that the university would work on guidance around anti-doxing, but students relayed that nothing was ever communicated to them after that. Emory had also informed students about a paid service they can use to remove themselves from the internet but explained that Emory would not pay for such a service.
- On October 12, 2023, ESJP students (b)(6); (b)(7)(A); (b)(7)(C) and (b)(6); (b)(7)(A); (b)(7)(C) met with Dean Andrea Hershatter (“Dean Hershatter”), one of the deans of Emory’s business school, to enlist her help in the issue ESJP students were facing with (b)(6); (b)(7)(A); (b)(7)(C) social media posts.

<sup>17</sup> See Exhibit 12.

Dean Hershatter started the meeting by saying that when students say “Free Palestine,” they are associating themselves with terrorism, implying that advocating for Palestinian freedom and equality is a “terrorist” act for which students may be criminally liable.

Dean Hershatter told (b)(6); and (b)(6);, who themselves had been the targets of Islamophobic and/or xenophobic harassment, that they should be more understanding of (b)(6);, a man falsely and dangerously maligning them with racist, anti-Palestinian tropes. This has been reported to Emory via the University’s bias reporting process. See the following bullet point for Emory’s response.

- Despite the fervent attacks by (b)(6); against current Emory students, (b)(6); has been on the Emory campus at least twice, once on October 23, 2023, at the invitation of Dean Hershatter<sup>18</sup> (after the impacted students informed her of (b)(6); threats), and once to attend a student rally in support of Israel (again, after the impacted students informed Dean Hershatter of (b)(6); threats). ESJP students had reported (b)(6); threats to campus police and had asked campus police to inform them if (b)(6); was ever on campus. Campus police failed to do so. Given (b)(6); open hostility toward Palestinian, Arab, and Muslim students, and their allies, (b)(6); presence on campus puts the impacted students’ physical and mental safety on campus in jeopardy. This has been reported to Emory via the University’s bias reporting process. ESJP was informed that on January 25, 2024, Emory University’s Office of Institutional Equity and Compliance opened an investigation against Dean Hershatter for equating anyone saying “Free Palestine” with automatically supporting terrorism and for inviting (b)(6); to campus after having been informed by ESJP students of him doxing them. Emory met with ESJP on February 5, 2024 and on March 26, 2024, and are in the process of completing their report. However, in a meeting with ESJP students, Ruth Vaughan, Assistant Director of Equity Investigations informed them that after her office concludes an investigation, they can only make recommendations on next steps based on any violations their office finds. The recommendations are not binding on the university, and it is up to Emory’s administration to follow the recommendations, if at all. (b)(6); (b)(7)(A); and (b)(6); (b)(6); also met with Emory administrators on November 2, 2023. Dean Gareth James of Emory’s Goizueta Business School told students that there were no future plans to invite (b)(6); to campus for any classes. Emory also removed (b)(6); from the business school webpage he was on. However, Emory also informed students that they cannot prevent (b)(6); from coming to campus. Provost Ravi Bellamkonda stated that the university tries not to intervene with who a faculty member invites and that he was not sure if there was a basis for (b)(6); to be banned since he did not threaten students’ physical safety. (b)(6); (b)(6); responded that even though (b)(6); did not physically hurt students, his actions encourage violence against students and the lack of the university’s response means there is a higher chance that students will be physically hurt.

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<sup>18</sup> See Exhibit 13.

D. Emory Administrators and Faculty Issued Biased, One-Sided Public Statements Since October 7, 2023, Risking the Safety of Emory's Palestinian, Arab, and Muslim Students.

In the face of this widespread racist and hostile environment, Emory has failed to support its Palestinian, Arab, and Muslim students not only via its investigation processes but also in its public statements. Since October 7, 2023, several administrators and faculty have issued public and/or University/department-wide statements solely in support of the students, faculty, and staff impacted by attacks in Israel, without mentioning the deadly violence and displacement suffered by Palestinians in Gaza and the West Bank as a result of the actions of the Israeli government and the impact of this violence on Palestinian students, faculty and staff and their allies on campus. When asked by students to address these concerns in their public statements, Emory University administrators either ignored them or informed them that the issue is too complicated for the University to address.

We are aware of at least four such problematic and biased statements by Emory administrators or faculty.

- On October 10, 2023, Barbara Krauthamer, Dean of the Emory College of Arts and Sciences, released a statement to the Emory College community.<sup>19</sup> In her statement, Dean Krauthamer mentioned the “deadly attacks in Israel” and their impact on Emory community members that have family and friends in the region, without mentioning Gaza, the mounting violence against Palestinians by the Israeli government, and its impact on the Palestinian, Arab, and Muslim communities at Emory. This has been reported to Emory via the University’s bias reporting process.
- On October 11, 2023, President Gregory L. Fenves (“President Fenves”) released an email statement to the University, its affiliates, students, and parents of students.<sup>20</sup> In his statement, President Fenves shared his “profound pain” at the attacks on Israel. However, he failed to acknowledge the violence the Israeli government, military, and illegal settlers have carried out against Palestinians in Gaza and the West Bank for decades, and the immense loss of life in Palestine since October 7. His lack of acknowledgment of Israeli violence on Palestinian lives and its impact on the University’s Palestinian community not only left these students feeling isolated and ostracized – and as though Emory valued their lives less than Israeli students – but it has also fostered an environment of increased anti-Palestinian rhetoric and Islamophobia on the University campus. This has been reported to Emory via the University’s bias reporting process.
- On October 11, 2023, Doctor Steven W. L’Hernault (“Dr. L’Hernault”), Chair of the Emory Department of Biology, released a statement to students and faculty within his department.<sup>21</sup>

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<sup>19</sup> See Exhibit 14.

<sup>20</sup> See Exhibit 15.

<sup>21</sup> See Exhibit 16.

Dr. L’Hernault’s statement, like other statements released by Emory administrators, was one-sided, only acknowledging the attacks in Israel on October 7, and failing to mention or acknowledge the violence endured by Palestinians in Gaza and the West Bank for decades and since October 7. This has been reported to Emory via the University’s bias reporting process.

- On October 25, 2023, President Fenves sent another email to the University, its affiliates, students, parents of students, and Emory alumni, about the Emory Stop Cop City protest, which had taken place earlier that day.<sup>22</sup> He claimed that “antisemitic phrases and slogans were repeatedly used by speakers and chanted by the crowd.” He also said that the “antisemitism targeting Jewish members of our community” was “divisive and reprehensible.” President Fenves to date has failed to publicly specify which phrases or slogans he believed to be antisemitic, which left a lot to the imagination of those who were reading the email and opened up groups who sponsored the event and anyone who attended or spoke at the event to harassment and attacks.<sup>23</sup> His statement again failed to condemn the rising anti-Palestinian environment and Islamophobia on Emory’s campus, in effect giving a green light to anti-Palestinian individuals and groups and Islamophobes to continue harassing the University’s Palestinian, Arab, and Muslim communities. To ESJP, Fenves’s October 25 email felt like an intimidation tactic because it caused students to feel that any sort of pro-Palestinian activity would be met with retaliation by the president himself and characterized falsely as hateful towards Jewish people. Without further context, Fenves’s email stoked fear in the community, including parents and alumni, that there had been actual antisemitic, hateful statements chanted at the protest.

On November 21, 2023, six weeks after October 7, President Fenves finally released an email statement to the Emory community that acknowledged the suffering of Palestinians.<sup>24</sup> His email expressed sympathy for the “emotional toll of the tragic war in Israel and Gaza,” mourned “the lives lost, both Palestinian and Israeli,” and condemned the “instances on our campuses where individuals have been targeted for their identities and backgrounds.” This email was sent just as students were preparing to leave for Thanksgiving break – limiting its impact and reach. Moreover, whereas his initial email condemning the October 7 attacks in Israel identified Hamas

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<sup>22</sup> See Exhibit 17.

<sup>23</sup> In a meeting with ESJP students on February 12, 2024, President Fenves did specify the phrase he thought was antisemitic: From the River to the Sea, Palestine Will be Free. When students tried to explain to him how that is an incorrect portrayal of the phrase, and discriminatory against Palestinian students, President Fenves again repeated that he views the phrase as antisemitic. Understanding this Palestinian call for freedom as a call for Jewish death is based on racist and anti-Muslim stereotypes of Palestinians as intrinsically violent and hateful towards Jews. See Noah Zatz, *Palestinian Freedom, Antisemitism Accusations and Civil Rights Law*, THE LAW AND POLITICAL ECONOMY PROJECT (Nov. 20, 2023), <https://lpeproject.org/blog/palestinian-freedom-antisemitism-accusations-and-civil-rights-law/>; see also Maha Nasser, “*From the river to the sea*” - a Palestinian historian explores the meaning and intent of scrutinized slogan, THE CONVERSATION (Nov. 16, 2023), <https://theconversation.com/from-the-river-to-the-sea-a-palestinian-historian-explores-the-meaning-and-intent-of-scrutinized-slogan-217491>; Yousef Munayyer, *What Does “From the River to the Sea” Really Mean?*, JEWISH CURRENTS (Jun 11, 2021), <https://jewishcurrents.org/what-does-from-the-river-to-the-sea-really-mean>.

<sup>24</sup> See Exhibit 18.

as the perpetrator, Fenves's November 21 email failed to identify Israel as the perpetrator of the violence in Gaza, leaving Palestinian students feeling that they are subjected to different treatment by the university.

As a cumulative effect of such statements, Palestinian, Arab, Black, Muslim students, and other students who are perceived to be Palestinian have felt alienated and alone on a campus where they have no support from the administration when they are the victims of anti-Palestinian, anti-Arab, anti-Black, or Islamophobic acts.

Students have submitted official reports to Emory through the school's bias incident reporting system about most of these incidents. Nonetheless, to date, Emory has failed to act<sup>25</sup> on the majority of reports of anti-Palestinian, Islamophobic, or otherwise racist harassment and discrimination. Emory has instead cultivated an environment in which these acts can thrive. Indeed, it appears Emory is using an inappropriately high investigatory standard, whereby Emory will not take action on a complaint unless the perpetrator is clearly identified and the harassment is both severe and pervasive, according to a conversation between SGA<sup>(b)(6); (b)(7)(A); (b)(7)(C)</sup> (b)(6); (b)(7)(A) with Dean of Campus Life, Enku Gelaye on March 25, 2024. Emory has never communicated this information directly to ESJP, rather, (b)(6); (b)(7)(A) reported this conversation to ESJP the following day.

#### E. Emory Has Failed to Address Student Concerns About Their Safety and Security on Emory's Campus

On January 24, 2024, CAIR-Georgia, Palestine Legal, and several other civil rights and community organizations notified Emory of most of the above-mentioned incidents<sup>26</sup> and informed the university of its obligations under Title VI of the Civil Rights Act of 1964.

President Fenves responded on January 31, 2024, denying that Emory was in violation of Title VI, because the school offered "jummah prayer services" and "created space" for a some events by ESJP and other groups on campus – many of which were in fact events where racist anti-Palestinian conduct or different treatment occurred, either by fellow Emory students or administrators.<sup>27</sup> The letter also stated that after students filed bias reports, representatives of

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<sup>25</sup> Emory University's Office of Institutional Equity and Compliance has opened an investigation against Dean Andrea Hershatter, her inviting alumnus (b)(6); (b)(7)(A); to campus after having been informed by ESJP students of him doxing them, and of Hershatter equating anyone saying "Free Palestine" with automatically supporting terrorism. However, in a meeting with Ruth Vaughan, Assistant Director of Equity Investigations, Ms. Vaughan informed ESJP students, that after her office concludes an investigation, they can only make recommendations on next steps based on any violations their office finds. The recommendations are not binding on the university, and it is up to Emory's administration to follow the recommendations, if at all.

<sup>26</sup> See, n.9. (Three new incidents are included in this complaint that were not in the January 24 letter – the November 14 general body meeting incident, the university's treatment of the February 2, 2024, memorial, and the March 1 incident involving (b)(6); (b)(7)(A); ).

<sup>27</sup> See Exhibit 19.

Bias Support Services tried meeting with the impacted students several times, but the students did not respond to their invitations. However, ESJP students never received such invitations.<sup>28</sup>

For example, the first event President Fenves included in his letter was the Vigil for Palestine that was hosted by ESJP. This is the same event that the official @emorycollege Instagram page ignored ESJP's request to promote in the same way that it promoted other events. President Fenves also named a MSA fundraiser for the Palestinian Children's Relief Fund. This is the same event at which an Emory parent verbally accosted a Black Muslim student, calling them a supporter of Hamas, and on-site Emory staff from the university's open expression office refused to intervene despite being called on for help. In his letter response, President Fenves also said that there were two protests on campus "in support of the Palestinian people." However, after one of these protests, President Fenves himself sent an email to the Emory community that same evening condemning the event over students' use of phrases in support of equality and justice for Palestinians that he alleges are "antisemitic." President Fenves also referenced a Memorial for Palestine on campus as a community event that was available for students on campus. However, President Fenves failed to mention that the university tried to prevent students from hosting the event in the format it was planned and violated its own policy by failing to help students identify alternative ways to express their dissent. President Fenves and Emory University cannot claim these events as spaces that Emory has created on campus for students to grieve, when in reality, Emory has condemned the actions of its own Palestinian, Arab, and Muslim students, failed to support and protect its students, and has made these students vulnerable to the kinds of harassment that have been documented in this complaint.

Following President Fenves's letter response sent on January 31, 2024, ESJP students and President Fenves had a meeting on February 12, 2024. During the meeting, students again described the hostile anti-Palestinian environment at Emory and its impact on them. Students urged Emory to support students who have been doxed, to protect its vulnerable students, and to provide safe spaces on campus for Arab-identifying students. They implored President Fenves to release a statement to the community apologizing for Emory's response thus far, condemning hate and racism, affirming the safety of its Palestinian students, and explicitly saying the word "Palestine." President Fenves refused to commit to a timeline to address student concerns. To date, no such statement has been released to the Emory community.

Upon information and belief, students from Emory MSA also met with President Fenves on or around this time along with other members of the administration, where students discussed several Islamophobic incidents that have taken place at Emory.

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<sup>28</sup> All students receive a generic response from the university whenever an incident is reported through the bias reporting process – acknowledging receipt of their report and outlining support resources. Since after October 7, ESJP students have reported numerous incidents to Emory. On November 2, [§ 87(2)(b)(6); (b)(7)(A); (b)(7)(E)] ESJP member, received an email from a member of the administration, Kyle Williams, seeking to meet with impacted students. On November 8, ESJP students had a meeting with Mr. Williams, where he simply explained the bias reporting process. Since October 7, ESJP students received only three responses for the many bias reports they submitted. Other than these attempts at Emory reaching out to impacted students, there have no other invitations from Bias Support Services for any meeting.

Students have been imploring Emory to see the consequences of its actions and to protect students since last semester (Fall 2023). Three graduate student government leaders, including GSGA (b)(6); (b)(7)(A); (b)(7)(C) met with President Fenves on October 27, 2023, to discuss President Fenves's email to the student body two days earlier which had accused students attending a protest of using antisemitic language. During the meeting, President Fenves explained that he also had the right to open expression and justified his approach. Student government leaders, including GSGA (b)(6); (b)(7)(A); (b)(7)(C) met for a second time with President Fenves on November 30, 2023, at the request of (b)(6);

## II. EMORY'S ACTIONS VIOLATE TITLE VI OF THE CIVIL ACT OF 1964.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin by institutions that receive federal financial assistance.<sup>29</sup> A university recipient of federal funding may be found to have violated Title VI in one of two ways: if it commits a discriminatory act of its own, or if it permits a hostile environment, i.e. when harassment by a third party or student is "so severe, pervasive, and objectively offensive that it effectively bars the victim's access to an educational opportunity or benefit."<sup>30</sup>

A university-recipient that has actual or constructive knowledge of a hostile environment must take prompt and effective steps that are reasonably calculated to end the harassment, eliminate the hostile environment, prevent its recurrence, and remedy its effects, by ensuring that students are not restricted from participation in or benefiting from their educational opportunities as a result of a hostile environment.<sup>31</sup> A university that responds with deliberate indifference, or fails to take appropriate responsive action to a known hostile environment, violates Title VI and risks losing federal financial assistance.<sup>32</sup>

Targeted and pervasive harassment of Palestinians, Arabs and Muslims on campus on the basis of race, national origin, and shared ancestry or perceived race, national origin, or shared ancestry is actionable under Title VI where such harassment impedes the educational opportunities of the targeted students. As a university obligated to provide an educational environment welcoming to all regardless of race, color, or national origin, Emory cannot justify its failure to address the hostile anti-Palestinian and Islamophobic environment students have been subjected to on campus and by its own administration.

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<sup>29</sup> 42 U.S.C. §2000d (1964).

<sup>30</sup> See *Davis ex rel. LaShonda v. Monroe Cty. Bd. Of Educ.*, 526 U.S. 629, 633 (1999). Although *Davis* is a Title IX case, the same legal standards are applied to Title VI enforcement. See, e.g., *Fitzgerald v. Barnstable Sch. Comm.*, 555 U.S. 246, 258 (2009) ("Congress modeled Title IX after Title VI of the Civil Rights Act of 1964, and passed Title IX with the explicit understanding that it would be interpreted as Title VI was.").

<sup>31</sup> See, e.g., Letter from Melanie Velez, Reg'l Dir., Dep't of Educ. Office for Civil Rights Region IV to Kathryn LeRoy, Superintendent of Polk County Pub. Schs. at 3 (Mar. 23, 2016) (RE: Case No. 04-14-1664),

<https://www2.ed.gov/about/offices/list/ocr/docs/investigations/more/04141664-a.pdf>.

<sup>32</sup> 42 U.S.C. § 2000d-1 (1964).

The discrimination, harassment, stereotyping, disparate treatment, and racial profiling described above are not isolated instances, but rather they are the product of deep-rooted, dehumanizing bigotry against Palestinians and their allies and they attempt to suppress speech supporting Palestinian rights on college campuses, which Emory not only failed to address, but further contributed to by committing discriminatory acts of its own.

Because of the anti-Palestinian and Islamophobic hostile environment on campus, students who are Palestinian, Arab, Muslim, perceived to be Palestinian, or associated with Palestinians have been denied educational opportunities. They report being afraid to leave their rooms, go to class, focus on their coursework, and fully participate in campus life. Palestinian students have especially suffered as a result of this open hostility and fear. Many are experiencing trauma and are afraid of seeking help from Emory because of the fear that their names and information will be released to external parties, or that identifying as Palestinians who believe in their own equality and right to life could lead to criminal consequences.

Rather than protecting its students, Emory's actions have encouraged and legitimized harassment and intimidation of its students who are Palestinian, Arab, Muslim, or those who are perceived to be Palestinian, associated with Palestinians and/or advocate for Palestinian rights. Students are speaking out in support of Palestinian rights in a political climate where Israel has declared its genocidal intentions against Palestinians, over 32,000 of whom have been killed in Gaza since October 7, including over 13,000 children. It is Emory's responsibility to ensure that Palestinian, Arab, and Muslim students are able to freely pursue their education in a campus environment that is free of anti-Palestinian, anti-Arab, and Islamophobic harassment and bigotry.

### **III. OCR SHOULD REQUIRE EMORY TO COMPLY WITH TITLE VI BY ENSURING THAT PALESTINIAN, ARAB, AND MUSLIM STUDENTS (AND THOSE PERCEIVED TO BE SUCH) HAVE EQUAL ACCESS TO EDUCATIONAL OPPORTUNITIES AT EMORY.**

In light of Emory's top-down, hostile environment and discriminatory actions against Palestinian, Arab, and Muslim students, and their allies, OCR should require the university to take the following steps:

1. Publish a public statement reaffirming its students' right to openly advocate for Palestinian rights, and condemning online doxing on Emory's website, social media, and to the campus community,
2. Publicly condemn the anti-Palestinian, anti-Arab, anti-Black, and other forms of racism and Islamophobia that its students are facing,
3. Publicly apologize to ESJP,
4. Ensure that those who harass or dox Emory students are prevented from being on campus,

5. Ensure that Palestinian, Arab, and Muslim students and their allies, are able to access campus services and resources on an equal basis as other students,
6. Provide resources for impacted students, including the 2024 through 2026 classes after they graduate, that are accessible to them and responsive to their needs, including but not limited to, ensuring that career services have the knowledge and tools to help students navigate the unique hurdles they face entering the workforce as targets of smear campaigns, providing digital security resources to assist students in organizing safely; and, ensuring access to culturally competent mental health support,
7. Give students the opportunity to rectify grades that have been impacted by Emory's refusal to provide academic accommodations to Palestinian, Arab and Muslim students and their allies and ensure that these students are provided with needed academic support, including assignment extensions,
8. Implement educational initiatives and workshops aimed at fostering a culture of inclusivity, tolerance, and respect for Palestinian students and their allies,
9. Recognize that opposition to the political ideology of Zionism is a stance for Palestinian equality, justice and freedom, revise its discrimination policies to recognize this, and conduct mandatory trainings for university staff regarding these policies and anti-Palestinian discrimination,
10. Not adopt, enforce or rely on the International Holocaust Remembrance Alliance Working Definition (IHRA) or its contemporary examples to identify or combat antisemitism,<sup>33</sup>
11. Conduct a thorough review of the incidents of harassment documented in this letter and other related reports Emory has received to ensure that the rights of students are protected, and that incidents of discrimination and harassment are addressed appropriately, and
12. Ensure that reports of student discrimination and harassment are taken seriously and addressed promptly.

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<sup>33</sup> Endorsing IHRA would further facilitate anti-Palestinian discrimination and harassment of the sort this complaint describes, and would lead to the infringement of bedrock First Amendment protections. *See Letter from Palestine Legal, Arab-American Anti-Discrimination Committee, and Center for Constitutional Rights to Hon. Catherine E. Lhamon - Assistant Secretary for Civil Rights, U.S. Department of Education, Re: OCR must act to address rise of anti-Palestinian and Islamophobic racism (Oct. 31, 2023),* <https://static1.squarespace.com/static/548748b1e4b083fc03ebf70e/t/65416bd823a85315b4d85402/1698786265201/2023.10.31+OCR+Letter.pdf>.

#### **IV. CONCLUSION**

For the above-mentioned reasons, we urge OCR to investigate Emory University's compliance with Title VI of the Civil Rights Act of 1964.

Sincerely,



Sabiya Ahamed  
Staff Attorney  
Palestine Legal



Javeria Jamil  
Legal Director  
CAIR-Georgia



UNITED STATES DEPARTMENT OF EDUCATION  
OFFICE FOR CIVIL RIGHTS, REGION IV

61 FORSYTH ST., SOUTHWEST, SUITE 19T10  
ATLANTA, GA 30303-8927

REGION IV

ALABAMA  
FLORIDA  
GEORGIA  
TENNESSEE

April 30, 2024

**By email only to:** [president@emory.edu](mailto:president@emory.edu)

Gregory L. Fenves  
President  
Emory University  
[president@emory.edu](mailto:president@emory.edu)

Re: Emory University – OCR Complaint Number 04-24-2178

Dear President Fenves:

On April 5, 2024, the U.S. Department of Education (the Department), Office for Civil Rights (OCR) received a complaint against Emory University (University). The complaint alleges that the University discriminated against students on the basis of national origin (shared Palestinian, Muslim, and/or Arab ancestry) and/or race (b)(6); (b)(7)(A) by failing to respond appropriately to incidents of harassment beginning on October 7, 2023. The complaint also alleges that the University treated the Students differently on the basis of national origin (shared Palestinian, Muslim, and/or Arab ancestry) and/or race (b)(6); (b)(7)(A) on October 10, 2023, when it removed a statement from the Emory Instagram account within a few hours and failed to repost a vigil for Palestine flyer, but reposted a vigil for Israeli clubs on campus; and, on February 2, 2024, when it did not allow staking of flags in the quad for a “Memorial for Palestine”, but allowed the staking of other signs in the area.

OCR enforces Title VI of the Civil Rights Act of 1964 (Title VI), 42 U.S.C. §§ 2000d, *et seq.*, and its implementing regulation, at 34 C.F.R. Part 100, which prohibit discrimination on the basis of race, color, or national origin in any program or activity receiving federal financial assistance from the Department. As a recipient of Federal financial assistance from the Department of Education, the University is subject to Title VI and to OCR’s jurisdiction.

OCR will investigate:

1. Whether the University responded to alleged harassment of students based on national origin (shared Palestinian, Muslim, and/or Arab ancestry) and/or race in a manner consistent with the requirements of Title VI.
2. Whether the University subjected students to different treatment based on national origin (shared Palestinian, Muslim, and/or Arab ancestry) and/or race in violation of Title VI.

Please note that opening an investigation in no way implies that OCR has made a determination with regard to the merits. During the investigation, OCR is a neutral factfinder, collecting and analyzing 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). Please open this link for additional information about OCR's Complaint Processing Procedures.

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 resolution of this case, OCR is providing an opportunity to present the University's response to the allegations and to submit supporting documentation. Please provide the information described in the attached data request **within fifteen (15) calendar days** of the date of this letter. 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 reaching a compliance determination. Pursuant to 34 C.F.R. § 100.6(c) and 34 C.F.R. § 99.31(a)(3)(iii), of the regulations 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.

Please be advised that the University 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 with OCR.

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

If you have any questions, you may contact Senior Attorney Lorraine Irier at (202) 987-1876 or me at (202) 987-1865.

Sincerely,

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

Ebony Calloway, Esq.  
Compliance Team Leader  
OCR Atlanta Office

Data Request  
Emory University

OCR is requesting that you forward the following information to us **within fifteen (15) calendar days of this letter** to Lorraine Irler ([lorraine.irler@ed.gov](mailto:lorraine.irler@ed.gov)). Please do not provide any Social Security numbers in your data response. If any responsive documents contain Social Security numbers, please redact the Social Security numbers before producing the responsive documents to OCR. Please submit all data in this matter to OCR electronically, if feasible. If the University submits the data electronically, no additional hard copy is needed. If you are sending a large electronic file, please contact OCR for directions on how to upload the file to OCR's secure file-sharing platform. Additionally, if any of the information is available online, you may provide the URL in lieu of hard copy documents. If any item in our request is unclear, or if you experience any difficulty complying with this request, please contact us prior to the expiration of the 15-day period. Please be aware that OCR may need to make additional requests for information in the future. If OCR needs to conduct an on-site investigation, we will notify you in advance.

**Preservation of requested and relevant data and documents:** OCR may request supplemental data and documents that are relevant to the allegation(s) under investigation. To ensure that OCR can assess the recipient's compliance with the statutory and regulatory obligations at issue in this investigation, please ensure that University 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 University employees preserve other data and documents that are relevant to the allegation(s) under investigation until OCR closes this case.

For purposes of these requests, "correspondence" includes letters, memoranda, emails, text messages, other electronic communications and records or notes of telephone conversations, and records or notes of meetings.

Please provide the following:

1. The name, title, and contact information of the University's:
  - a. Contact person for this complaint;
  - b. Person authorized to resolve this complaint; and
  - c. Person responsible for responding to Title VI complaints.
2. A copy of the University's policies and procedures, and/or a description of the University's practices, governing the investigation of complaints of discrimination, including harassment on the basis of national origin, including shared ancestry, or race. Include a detailed description of the complaint process, including each level of the process, articulated timeframes for resolution, and the types of records maintained. Also identify the names and titles of University staff responsible for handling complaints of discrimination, including harassment on the basis of shared or perceived shared ancestry, at each level of the process.
3. For the 2022-23 and 2023-24 academic years, copies of all formal and informal reports/complaints, including records of oral reports/complaints, concerning alleged

discrimination, including harassment based on national origin, including shared ancestry, or race and the University's response to those complaints, including (but not limited to) correspondence, internal and external memoranda, investigative reports, witness statements, logs, forms, meeting minutes and notes generated for each complaint. 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 University took in response to the complaint/report;
- e. the University'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.

4. A detailed description of any training regarding discrimination, including harassment, based on national origin/shared ancestry or race provided to University staff and students. For each such training provide the dates of such training, a description of the training, a list of the names (and titles where appropriate) of the individuals who attended the training, and copies of any materials distributed during the training.
5. Documentation of any efforts by the University during the 2023-2024 academic year to prevent or address race, color or national origin discrimination, including shared ancestry, at the University.
6. A copy of all University policies or procedures related to “doxxing” or the act of publicly providing personally identifiable information about an individual or organization in the University community.
7. For the 2022-23 and 2023-24 academic years, 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 University 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 University took in response to the complaint/report;
  - e. the University'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.

8. A copy of all University policies or procedures related to allowing or removing statements from University social media accounts, including (but not limited to) Instagram.
9. A copy of all University policies or procedures related to allowing or prohibiting staking of flags or signs on University controlled property, including (but not limited to) “the quad”.
10. The names and titles of all persons who assisted in the preparation of these data responses.
11. The University is invited, but not required, to provide a narrative response to the issue opened for investigation.
12. Any other information that the University believes will be helpful to OCR or relevant in this investigation, if the University wishes to provide such information.