

TO:

New York Office
Office for Civil Rights
U.S. Department of Education
32 Old Slip, 25th Floor
New York, NY 10005-2500
Telephone: (646) 428 3800
Email: OCR.NewYork@ed.gov

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

(b)(6); (b)(7)(A); 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) 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); (b)(7)(A) 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); [REDACTED] 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 heartbreaking 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)

04/09/2024

Signature

Date

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

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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); (b)(7)(C) 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 *falsely* 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) 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)

(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); (b)(7)(A); (b)(7)(C) 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 lobbed against members of QC MSA and QC SJP (such as calling the students (b)(6); (b)(7)(A); (b)(7)(C)) 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); (b)(7)(C) 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 protesters 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); (b)(7)(C) 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); (b)(7)(A); (b)(7)(C) expressed that the lack of response to her complaint made her feel "unheard and unseen." She stated, "As a (b)(6); (b)(7)(A); (b)(7)(C) student, especially a woman, no one should be (b)(6); (b)(7)(A); (b)(7)(C) It made me feel so uncomfortable and unheard and unseen. This campus makes every (b)(6); (b)(7)(A); (b)(7)(C) student feel unheard and unseen." (b)(6); (b)(7)(A); (b)(7)(C) also expressed that witnessing the lack of response to the complaint made by (b)(6); (b)(7)(A); (b)(7)(C) 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); (b)(7)(A); (b)(7)(C) 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); (b)(7)(A); 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); (b)(7)(A) 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); 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); 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 goes 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); (b)(7)(C) 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); (b)(7)(C) 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); (b)(7)(C) alumnus of Queens College named (b)(6); (b)(7)(A); (b)(7)(C) was also present and engaged in the same March 4th event. When the (b)(6); (b)(7)(A); (b)(7)(C) 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); (b)(7)(C) alumnus saw this, (b)(6); (b)(7)(A); (b)(7)(C) (b)(6); (b)(7)(A); (b)(7)(C) 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 March 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); (b)(7)(C) 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 [REDACTED] 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 [REDACTED].” Additionally, [REDACTED] 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=MXZjcDlvM2tldHU2NA%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)(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); (b)(7)(A); (b)(7)(C) 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)(7)(A); (b)(7)(C) was not there. One of the (b)(6); (b)(7)(A); (b)(7)(C) 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); (b)(7)(A); (b)(7)(C) a (b)(6); (b)(7)(A); (b)(7)(C) 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); (b)(7)(C) 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); (b)(7)(A); (b)(7)(C) 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)(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/C34OTp6OPPc/?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) 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)(7)(C)

(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*, MEMO Middle East Monitor, <https://www.middleeastmonitor.com/20240107-the-idfs-propaganda-no-longer-holds-any-weight/>, (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 Kiely Hall, Queens College



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

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

21w 17 likes Reply ...

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

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)

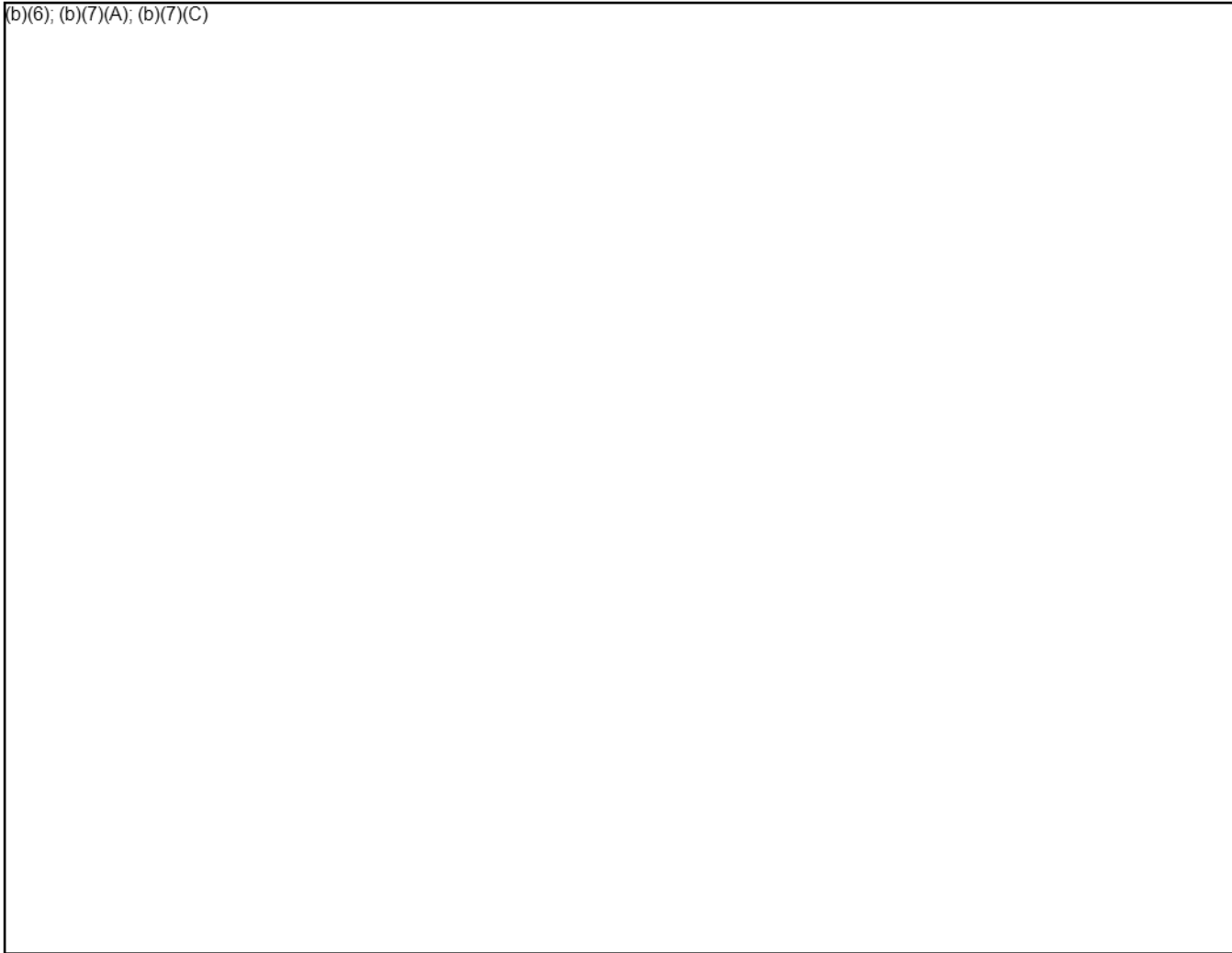


Exhibit C

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

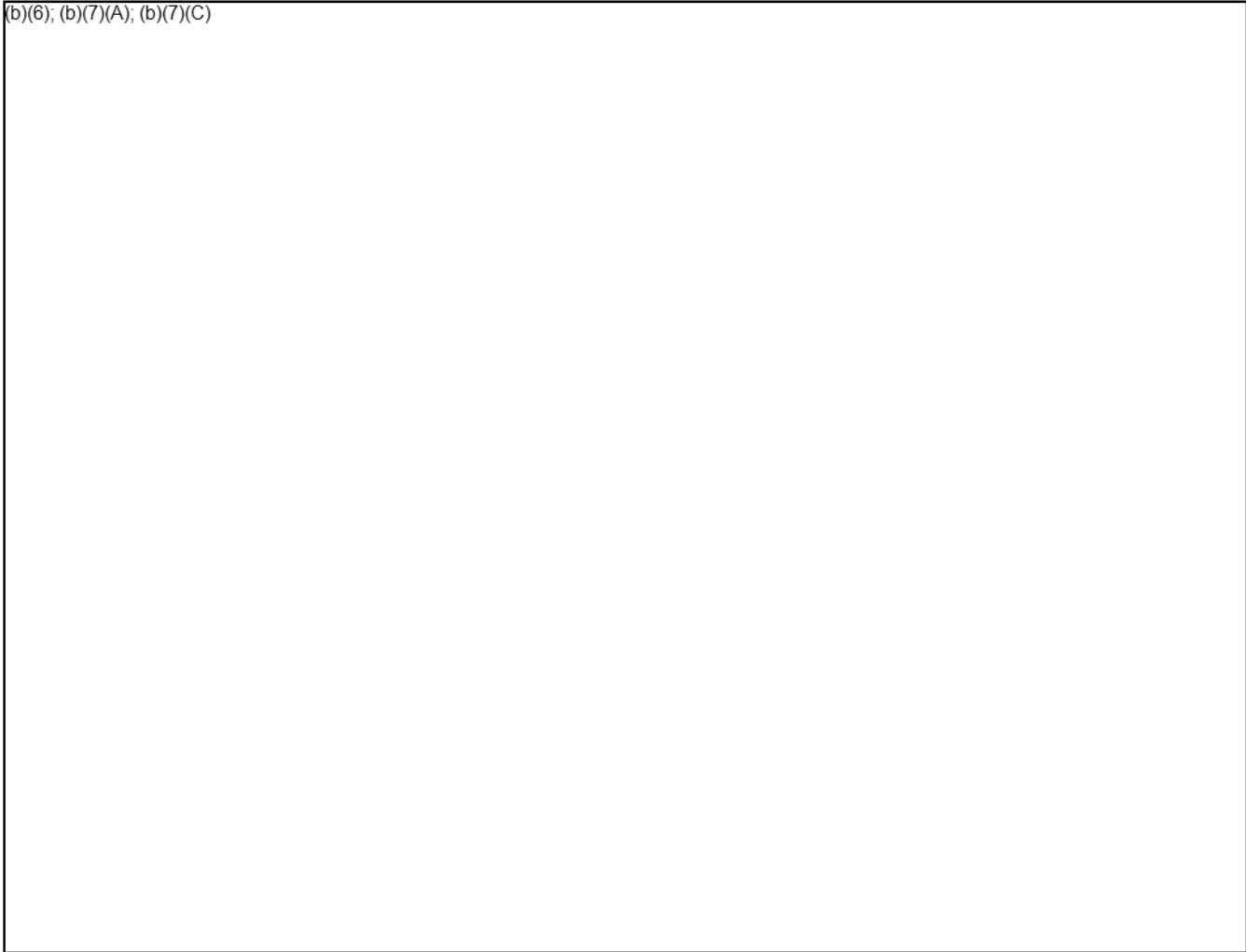


Exhibit D

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

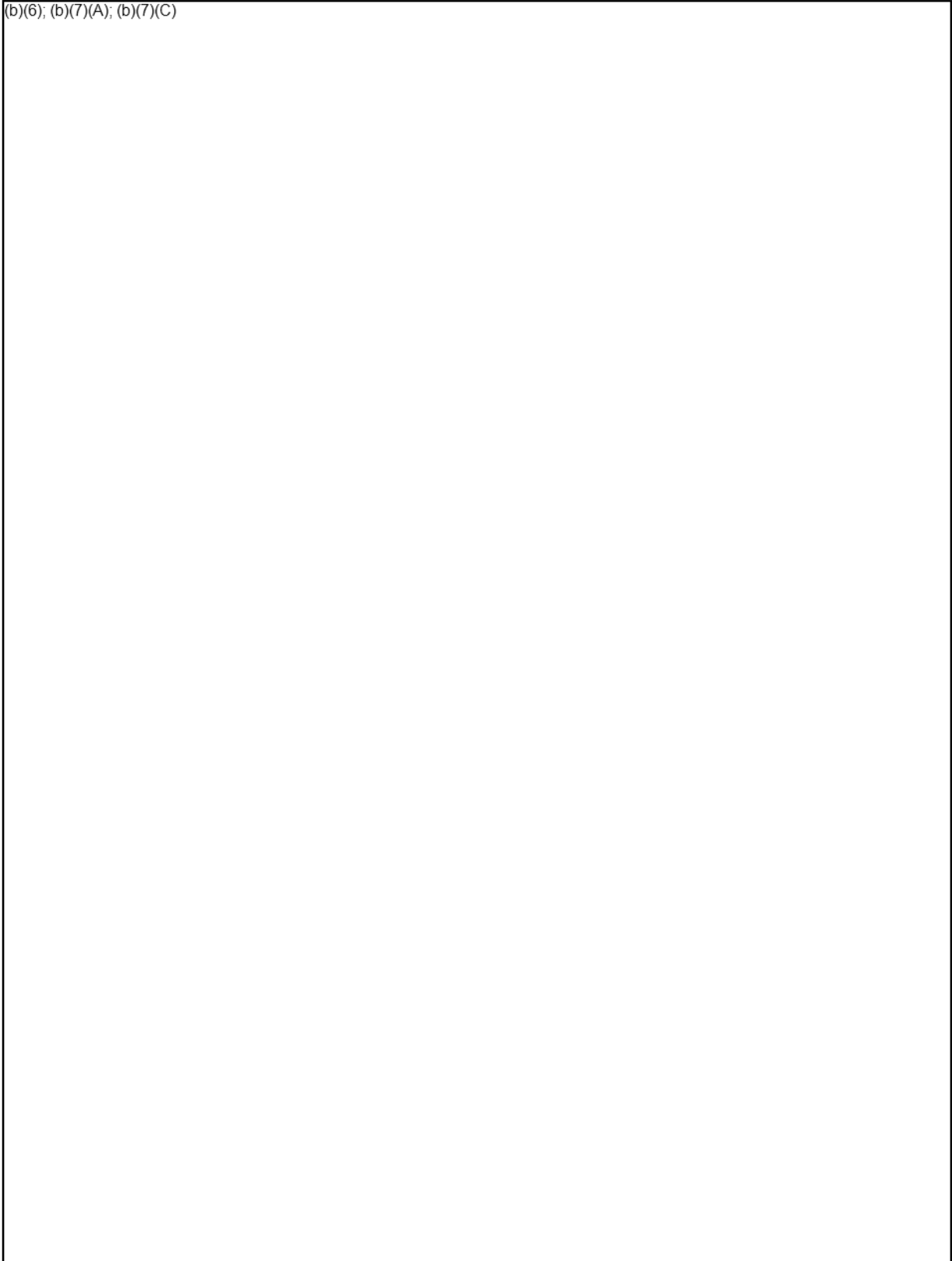


Exhibit E

