



April 23, 2024

SENT VIA EMAIL

New York Office
Office for Civil Rights
U.S. Department of Education
New York, NY
Email: OCR.NewYork@ed.gov

Assistant Secretary –
Catherine E. Lhamon
U.S. Department of
Education
Office for Civil Rights
Washington, DC
Email: OCR@ed.gov

Chief of Staff and Senior Counsel –
Alexander Rias
Title VI Section Chief – Christine
Stoneman
Education Section Chief – Shaheena
Simons
Civil Rights Division
U.S. Department of Justice
Washington, DC
Emails: alexanderI.A.ias@usdoj.gov,
Christine.Stoneman@usdoj.gov,
Shaheena.Simons@usdoj.gov

Re: Complaint Against Rutgers University Concerning Anti-Palestinian Discrimination

Assistant Secretary Lhamon, et al.:

The American-Arab Anti-Discrimination Committee (“ADC”) and the Council on American-Islamic Relations – New Jersey (“CAIR-NJ”) write to make a complaint against Rutgers University (“Rutgers” or “the university”) concerning anti-Palestinian discrimination that Rutgers students have been experiencing from and on its campuses over the course of this academic year. Through the Muslim Law Students Association (“MLSA”) and the student chapter of the National Lawyers Guild (“NLG”) of Rutgers University Law School - Newark (“Rutgers Law” or “the law school”), we have gained insight into systemic discrimination at Rutgers. The allegations in this complaint reflect an ongoing pattern and practice of direct and indirect discrimination by Rutgers, as well as Rutgers’ deliberate indifference to a hostile learning environment on its campuses for students who hold, are perceived to hold, or are affiliated or associated with Palestinian identity. Such students include members of the MLSA and NLG and many other students involved this academic year in activism supporting Palestinian lives and liberation. Based on the allegations in this complaint, we urge systemic investigation of Rutgers and remediation under Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d, *et seq.* (“Title VI”), its implementing regulations, and related policies and guidance of the Office for Civil Rights (“OCR”) within the U.S. Department of Education (“DOE”).

I. OCR's Jurisdiction

Rutgers is a public university that receives federal funding from DOE and is therefore subject to Title VI. 34 C.F.R. §§ 101.1–101.2. The allegations in this complaint reflect national-origin discrimination under Title VI against students who hold, are perceived to hold, or who are associated or affiliated with Palestinian identity, by virtue of their skin color, dress, the ancestry of their name(s), their religious practice(s), and/or their speech and activism in support of Palestinian lives. This complaint is timely because it alleges an ongoing pattern and practice of discrimination and a related hostile environment at Rutgers reflected in various incidents on and around the university, the most recent of which have occurred within 180 days. *Id.* § 100.7(b). ADC and CAIR-NJ have not raised the Title VI claims in this complaint against Rutgers to another agency or forum.

II. Factual Allegations

The allegations that follow come from Rutgers law and undergraduate students. The allegations include hyperlinks to public-source material and hyperlinks to sensitive, non-public materials in the possession of relevant students and undersigned counsel. Once OCR assigns this complaint a complaint number, undersigned counsel will provide relevant OCR personnel access to the non-public links via their OCR email addresses.

Introduction and background

1. We write as student members of the National Lawyers Guild Rutgers Law School Newark and the Muslim Law Students Association, on behalf of a diverse body of concerned students from various Rutgers campuses across the state. As aspiring legal advocates concerned with the prevention of harassment and discrimination, we are deeply troubled by the University's failure to protect students who hold, are perceived to hold, or who are associated or affiliated with Palestinian identity against discrimination and harassment by Rutgers personnel and third parties. In the months following the events of October 7, 2023, this class of students has been subject to increased harassment, discrimination, intimidation, and physical violence. The purpose of this complaint is to seek enforcement of the University's obligations under Title VI of the Civil Rights Act of 1964.
2. Students across Rutgers campuses in the State of New Jersey have stood in uncompromising solidarity with the Palestinian people in their national liberation struggle as they continue to resist US-backed Israeli colonization,

illegal military occupation, and apartheid before and after October 7th. No one and nowhere in Gaza is safe from Israeli military violence. Israel's genocide of the Gaza Strip has targeted Palestinians in their homes, colleges, churches, mosques, evacuation caravans, hospitals, refugee tents, UN shelters, food lines, and more in clear contravention of international law. Over 33,000 Palestinians have been killed and 77,000 injured in a campaign the world's highest court has recognized as plausibly genocidal.

3. While Palestinians in Gaza face genocide, Palestinians in the West Bank face ongoing military occupation and pogromist violence from settler mobs that act with impunity.
4. Rutgers is the flagship educational institution of the State of New Jersey, home to 67,200 students and over 10,000 educators across four campuses.
5. New Jersey is home to one of the largest communities of Arab Americans in the country, second only to Michigan. Paterson, New Jersey is home to one of the largest Palestinian populations in the country, second only to Chicago. New Jersey is also home to the highest concentration of Muslim residents in the United States.
6. Thousands of New Jerseyans who are Palestinian, perceived to be Palestinian, or are associated or affiliated with Palestinians—including many Arabs and Muslims—have cycled in and out of Rutgers to teach and learn.
7. For these members of the Rutgers community, it is our families, friends, and loved ones being killed. Palestinians in Gaza face a genocide while Palestinians in the West Bank face military occupation and pogromist violence from settler mobs. And due to the action and inaction of universities across the country, Palestinians in the United States face violence on their own campuses, simply for organizing against a genocide of their own people. The devaluation of Palestinian lives that lies at the root of Israel's genocide and international complicity extends to US college campuses.
8. As a result of the ongoing genocide in Gaza and mass murder of Palestinians, students across Rutgers campuses have exercised their right to engage in constitutionally protected speech to support Palestinians, as well as condemn the actions of Israel and the United States. Palestinian identifying or perceived students who choose to speak out against the genocide face an onslaught of

harassment, censorship, intimidation, and violence from fellow students and faculty, emboldened by the administration's failure to protect its students.

9. Rutgers has had ample notice of the ongoing pattern and practice of direct and indirect anti-Palestinian discrimination from the university and hostile on-campus environment. Nonetheless, Rutgers has failed to respond or take any meaningful steps to address it.
10. Rutgers' actions and inactions have been emboldening and exacerbating on-campus Anti-Palestinian discrimination in alarming ways. In this way, Palestinians have become defacto second-class students on their own campuses. Rutgers must engage in proactive protection, not reactive remedies.
11. The following factual allegations have been anonymized to protect the identities of all students referenced: both those experiencing discrimination and those inflicting it.
12. Given the fear that students feel for their physical safety because of doxxing and physical violence that has already occurred on campus, the anonymization of the identities of the people discriminating against them may help minimize the risk of retaliation and escalation from those people and/or third parties.

Allegations relevant to all Rutgers campuses

13. On October 9, 2023, President of Rutgers University, Jonathan Holloway, released a statement on circumstances in Israel and Gaza.
14. On October 11, 2023, President Holloway followed up with another statement, which was exclusively pro-Israel because it did not acknowledge Palestine (referring only briefly to Gaza) and did not acknowledge the nearly 1,000 Palestinians whom the Israeli military had killed within the past week. He wrote "What Hamas did in brutally murdering, torturing, and holding hostage innocent Israeli victims of all ages was unconscionable and an act of terrorism. That Hamas has reportedly threatened to murder the hostages one by one, and show them on film, only reinforces their brutality and terrorism. Our hearts go out to the people of Israel."
15. Immediately following this one-sided email, students, alum, and faculty alike emailed the President and his office, urging him to correct his statement and to address its impacts on many members of the university community. On October 13, 2023, Muslim alumni of Rutgers sent a letter to President

Holloway, writing “[President Holloway’s] pro-Israel remarks not only are skewed and insensitive to the plight of millions of innocent brothers and sisters struggling and dying in Palestine, but are dangerous in that they perpetuate the stereotype of Palestinians as terrorists and create an unsafe environment for Muslims and Arabs on campus, in our home communities, and at large.”

Allegations relevant to Rutgers Law School – Newark Campus

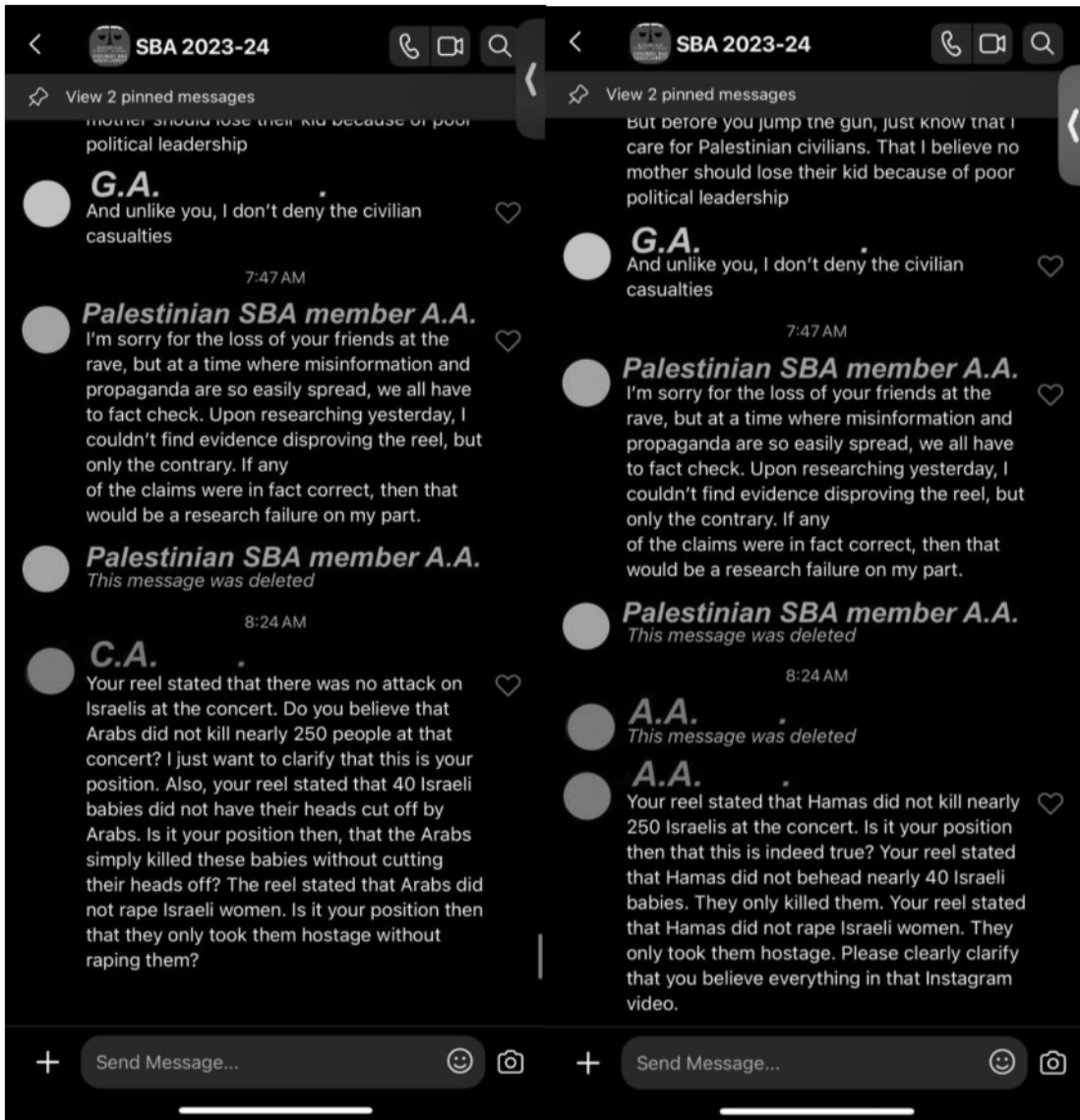
16. On October 11, 2023, the Dean of Rutgers Law School, Johanna Bond, followed up on President Holloway’s statements by sending an email to the law school student body that mentioned neither Palestinians, Israelis, Israel, Palestine, or Gaza, stating, “Like all of you, I have been deeply saddened by the tragic loss of life in recent days in the Middle East.” When offered the opportunity to correct President Holloway’s one-sided message to the student body and to address its impacts on Palestinian and other students on campus, Dean Bond failed to use it.
17. On October 12, 2023, Palestinian law student D.A. urged President Holloway and law school deans Johanna Bond, Sarah Regina, and Shani King to protect the rights and safety of all students on campus, predicting President Holloway’s email would lead to anti-Palestinian violence and discrimination against students:

“Please see my email to President Holloway regarding this racist, inciting email against Palestinians, Arabs, and Muslims below. What is it that the university will be doing to ensure the safety of supporters of Palestinians rights - and those closely associated with Palestinians - in light of this sickening email? I am a student here, and just like anyone else, I expect that my identity as a Palestinian, my beliefs as a Muslim, and my viewpoints as a supporter of Palestinian freedom will be respected. This is not only my request, but my right as a student at a public university.”

Deliberate Indifference to the Doxxing of a Palestinian, Muslim Student and of a South Asian, Muslim Student

19. On October 12, 2023, students A.A. and B.A. were doxxed by C.A., a peer in the law school student government known as the Student Bar Association (“SBA”).
20. A.A. is an olive-skinned, Muslim, and Palestinian student with a beard.
21. B.A. is a brown-skinned, South Asian, Muslim student.

22. In an email directed to a large group, C.A. shared screenshots of messages of B.A. and A.A. from the SBA group chat, falsely asserting that they “supported Hamas,” a designated Foreign Terrorist Organization (“FTO”). This email group included Dean Nikita Pandit and Professor T.A.
23. C.A.’s email had been prompted by an email from the Jewish Law Student Association (“JLSA”), encouraging its members to “take screenshots” and “make records” of pro-Palestinian activity.
24. In his email, C.A., an elected representative and member of the SBA, doxxed A.A. and B.A. by encouraging everyone in the email group to widely share with their networks these students' names and faces: “Please add me to the WhatsApp group. I am taking receipts of the law school students who are publicly supporting Hamas. See the attached screenshots of these individuals. Please share with your friends.”
25. A.A. and B.A. filed individual conduct and organizational conduct complaints against C.A. and the JLSA, respectively, on October 20, 2023, putting the Office of Student Conduct on notice as to the specifics of C.A.’s targeting of A.A. (Palestinian and Muslim) and B.A. (South Asian and Muslim).
26. As a result of being doxxed, A.A. and B.A. have been fearful of physical harm because of C.A.’s wrongly having labeled them to be supporters of an FTO. B.A. needed to consult with a mental health professional following a panic attack stemming from the doxxing. B.A. has reported being unable to sleep or focus on studying. The doxxing occurred during midterm exams, causing B.A.’s academic performance to suffer due to the anxiety surrounding this incident.
27. C.A. additionally sent a message in the SBA group chat directed to Palestinian student A.A. and conflating all Arabs with Hamas. C.A. had initially stated that “Arabs” had raped women, beheaded babies, and killed Jews and then deleted and re-sent the message, replacing “Arabs” with “Hamas.”



28. On October 16, 2023, four Palestinian and Muslim students, including the two doxxed students (A.A., who is Palestinian and Muslim, and B.A., who is South Asian and Muslim), met with a number of law school deans, as well as members of the Division of Student Affairs at Rutgers Newark, which encompasses the Chancellor's office, Office of Student Conduct, and the Bias Education Response Team. These students met to directly discuss doxxing, hostility, and protection of students on campus who are Palestinian, perceived to be Palestinian, or associated or affiliated with Palestinians. The students expressed their concerns that President Holloway's one-sided email would operate as a green light for anti-Palestinian hostility to proliferate on campus, as suggested by the doxxing that had already happened to B.A. and A.A.. Students asked these officials to take a number of corrective actions, including:

- a. Publishing a statement affirming the rights of student groups/students who have expressed support for Palestine to openly advocate for the rights of Palestinians;
 - b. Publishing a statement to condemn anti-Palestinian and other forms of racism and Islamophobia, which its students have been the target of since President Holloway's second university statement;
 - c. Apologizing for creating an environment that has encouraged further harassment and threats against students, particularly against students of color, Muslim students, and those connected to or supportive of the lives of Palestinians;
 - d. Providing resources for impacted students including channels for students to report incidents of discrimination or harassment and ensuring the reports are taken seriously and addressed promptly;
 - e. Conducting a thorough review of incidents of harassment and discrimination to ensure the rights of students are protected and the incidents are addressed appropriately;
 - f. Implementing educational initiatives and workshops aimed at fostering a culture of inclusivity, tolerance, and respect for students, including Palestinian students and their allies; and
 - g. Mandating trainings conducted by relevant advocacy organizations for university administration, staff, and faculty on the topics of anti-Palestinian racism and the Palestinian exception to free speech.
29. On October 18, 2023, Assistant Vice Chancellor and Dean of Students Erica Williams confirmed that the Office of Community Standards & Student Development was made aware of the incidents flagged to the deans on October 16, 2023, would address the individual cases, and would set up a meeting for the students with the Chancellor.
30. To date, the Palestinian and Muslim students who met with the deans on October 16, 2023, have still not received a resolution of their complaints or even an explanation about why the complaints have remained pending for over six months. Likewise, the law school has not held accountable or offered bias training to C.A. or any other members of the law school community who have harassed and doxxed Palestinian and allied students and has not scheduled

the requested follow-up meeting between the Chancellor and Muslim and Palestinian students.

Deliberate Indifference to Anti-Palestinian Discrimination Against an Anti-Zionist, Jewish Student

31. On October 12, 2023, F.A., a Jewish anti-Zionist student of the law school, stopped receiving emails on the JLSA email distribution after expressing solidarity with the Palestinian people. F.A. sent a text message to a member of the SBA, expressing concern that the removal was due to their solidarity with Palestine.
32. On October 13, 2023, a member of the SBA notified the administration on behalf of F.A. via email and was informed of the University's non-discrimination policy for student organizations on campus and that the administration was working on the reported issue, among others.
33. F.A. has not received any further emails from JLSA, while other JLSA members have continued to receive JLSA emails.
34. F.A. believes that JLSA is not welcoming of Jewish students like F.A. who reject the political ideology and ethno-centrism of Zionism, have a humanist perspective, and believe passionately in the lives and liberation of all people, including the Palestinian people.
35. JLSA's exclusion of F.A. from its emails and the law school's failure to remedy that exclusion sends the message to F.A. and other Jewish students like F.A. that supporting Palestinian freedom and rejecting Zionism come at the cost of losing access to meaningful aspects of campus life.

Deliberate Indifference to Anti-Palestinian Remarks Against a Student Group and Palestinian Student

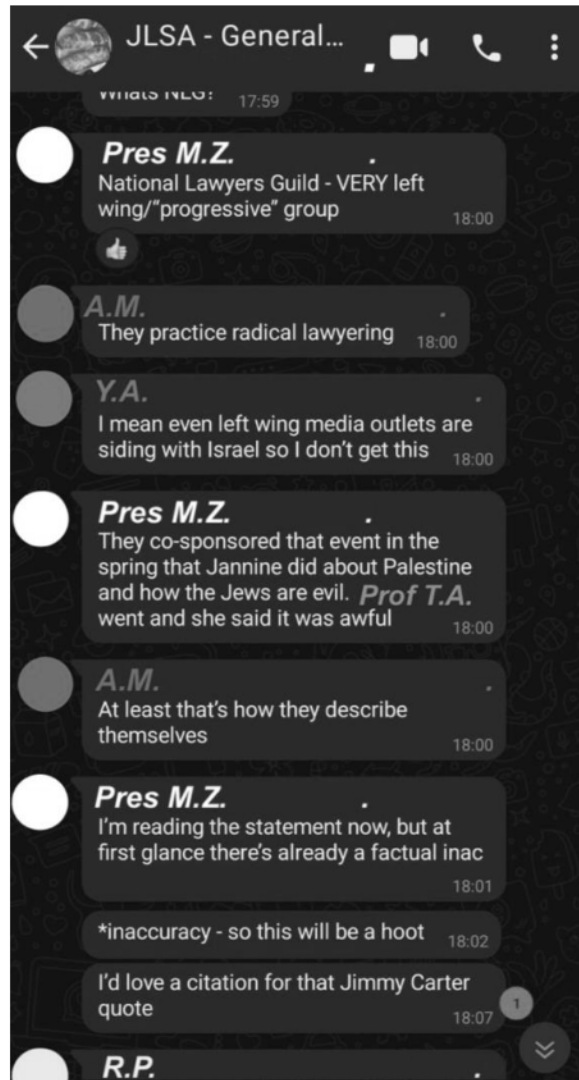
36. On October 17, 2023, the student NLG chapter of the law school released a statement expressing solidarity with the Palestinian people in their continued struggle for liberation. This statement was circulated to the Rutgers Law Newark student body via email and group chat. The statement was also posted to the Minority Student Program official group chat, which includes approximately 300 students and some deans of the law school.

37. Later that day, in the Minority Student Program group chat, a JLSA member and student, G.A., accused the NLG chapter of the law school and another student, D.A., who is olive-skinned, Muslim, and Palestinian, of supporting terrorism: “I can’t believe what I’m reading . . . It’s beyond me how you [the NLG] could endorse a terrorist organization It’s just how blatantly the statement you [D.A.] posted support [for] a terrorist organization that caught me by surprise.”
38. Although D.A. was alarmed and offended by G.A.’s comments to her in the chat group, D.A. responded by inviting G.A.. and all students in the chat group to a teach-in on Palestine.
39. Dean Clifford Dawkins, the creator and moderator of the chat group, did not condemn, rebut, or acknowledge the remarks of G.A. to D.A. in the chat group or otherwise contact D.A. to gauge and address their impacts on her — although, earlier in the day, he had sent numerous messages in the chat group to urge civility and humanity there between students in their dialogue about the NLG statement.
40. D.A. was very troubled by Dean Dawkins’ silence and non-engagement of G.A.’s remarks to her, given that the Minority Student Group is supposed to be a space committed to challenging racism and supporting students impacted by it. Instead of receiving support from Dean Dawkins, D.A. felt abandoned by him and left to conclude that racism against her did not matter to the dean.
41. On November 8, 2023, D.A. met with the Bias Education & Report Team (“BERT”) of the law school about the bias incident in the Minority Student Program group chat and Dean Dawkins’ failure to address G.A.’s comments to D.A. On November 12, 2023, December 11, 2023, and January 4, 2024, D.A. followed up with BERT staff to ask about any bias education interventions offered to or done with Dean Dawkins and G.A.. BERT did not respond to any of the emails from D.A.

JLSA Members’ Contemplation of Doxxing NLG Members, in Retaliation for Their Support of Palestinian Lives and Liberation

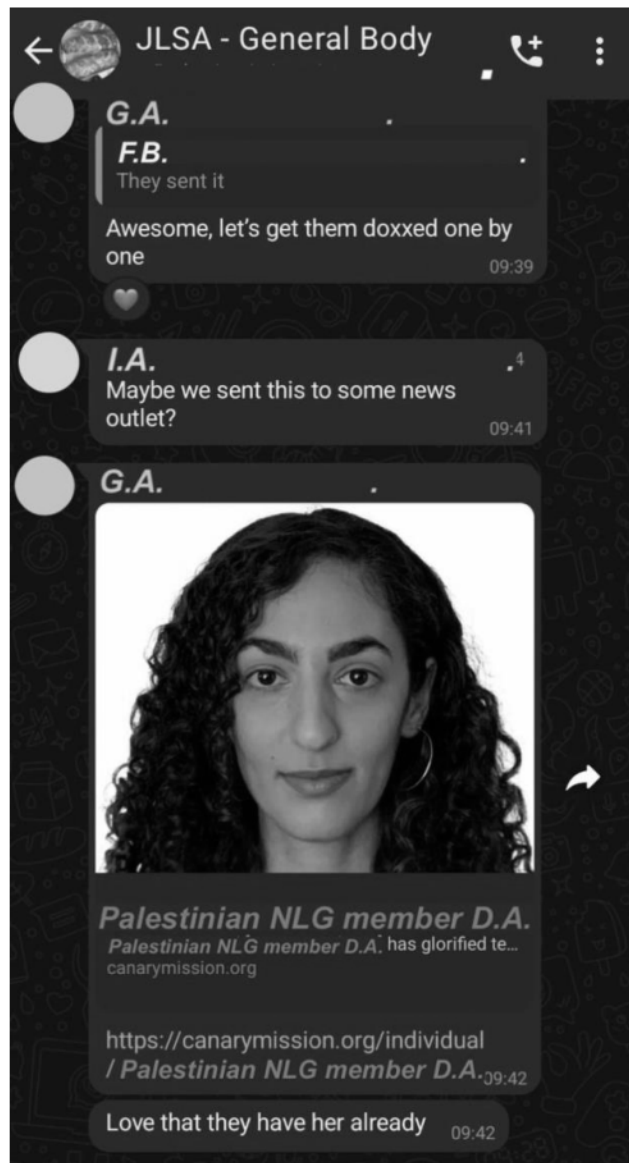
42. On October 17 and 18, 2023, members of JLSA in the JLSA WhatsApp chat contemplated doxxing members of the NLG in retaliation for the NLG’s pro-Palestinian statement.

43. Offering context to JLSA peers about the NLG, H.A., President of the JLSA, wrote in the chat: “[NLG] co-sponsored that event in the spring that [D.A.] did about Palestine and how the Jews are evil. Prof. [T.A.] went and she said it was awful” [sic].

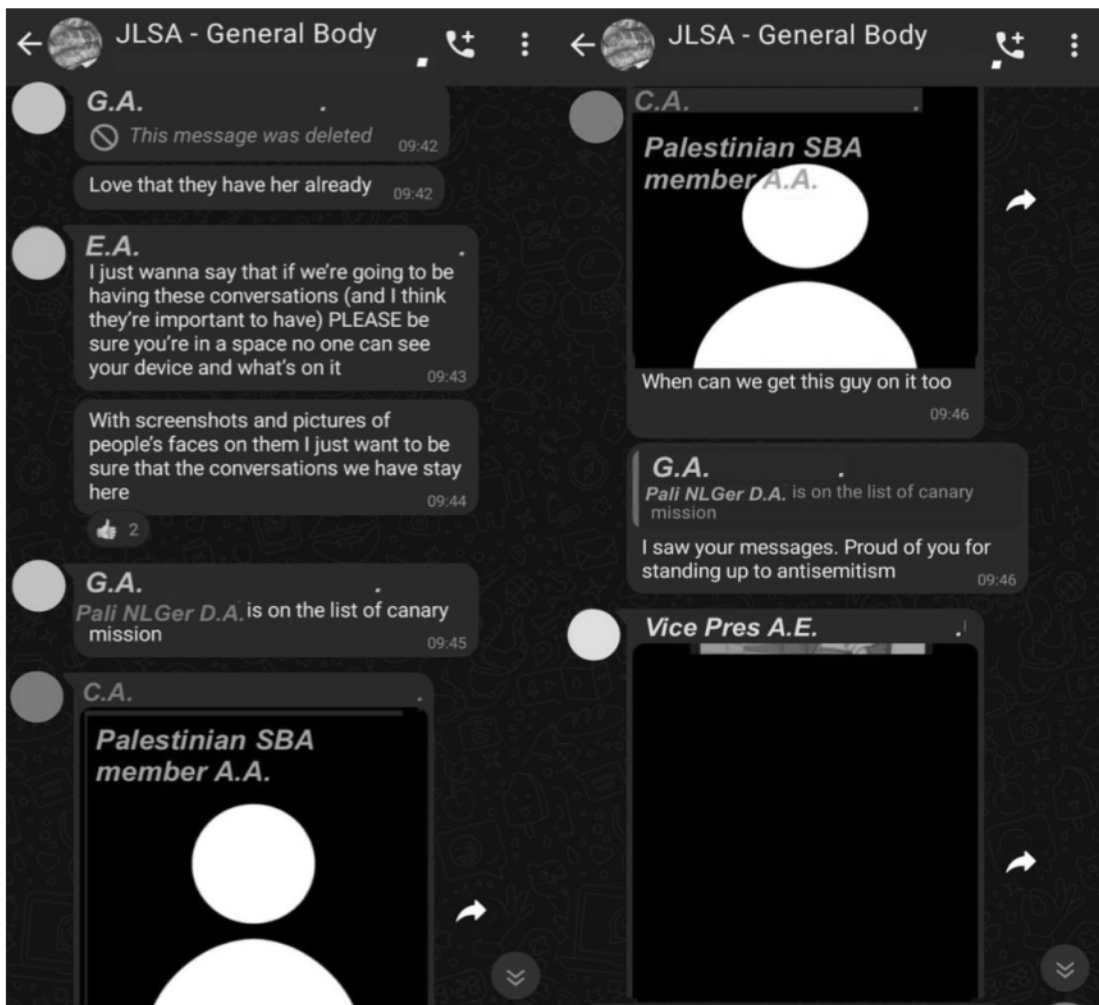


44. JLSA member I.A. proposed about the NLG’s statement, “Maybe we send this to some news outlet?”
45. G.A., the SBA representative who had discussed Palestinian classmate D.A. within the Minority Student Group chat space, asserting that D.A. supports terrorism, responded in the JLSA chat with a link to the [Canary Mission](#) page for D.A.

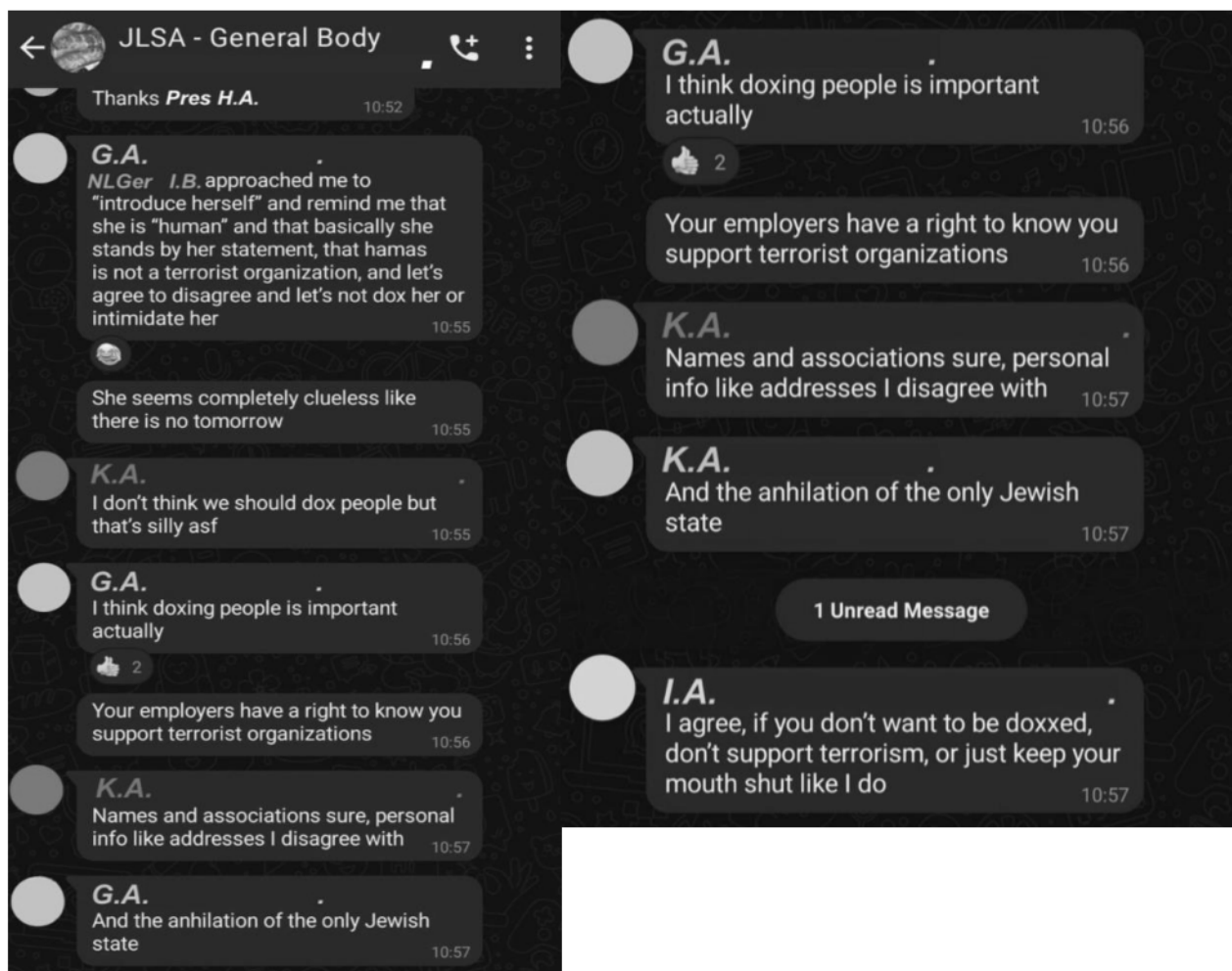
46. Canary Mission is a McCarthyite blacklist site that posts images and information of individuals who have been critical of Israeli governmental policies or practices. Canary Mission website listings are used by the Israeli government and border control to interrogate and deny entry of Palestinians and allies into Israel. Canary Mission maligns individuals by asserting them to be putative terrorists, putative Islamic extremists, and putative anti-Semites, and encouraging their large follower base to engage in targeted harassment.
47. G.A. celebrated Palestinian student D.A.'s Canary Mission listing, writing in the JLSA chat, "Love that they have [D.A.] already."



48. D.A.'s McCarthyite dossier on Canary Mission lists her alleged associations, affiliations, education, work, social contacts, social media accounts, and screenshots from her private social media.
49. A student named E.A. warned others in the JLSA chat to cover their tracks, stating "I just wanna say that if we're going to be having these conversations (and I think they're important to have) PLEASE be sure you're in a space no one can see your device and what's on it[.] With screenshots and pictures of people's faces on them I just want to be sure the conversations stay here[.]"
50. G.A. reiterated to the group that "[D.A.] is on the list of canary mission[.]"
51. JLSA member C.A. replied to G.A.'s message, stating "I saw your messages. Proud of you for standing up to antisemitism[.]" C.A. then posted the photo and name of Palestinian student A.A., stating "When can we get this guy on it too." These messages of C.A. were subsequently deleted from the chat.



52. G.A. wrote about NLG member I.B. in the JLSA chat, stating: “[I.B.] approached me to ‘introduce herself’ and remind me that she is ‘human’ and that basically she stands by her statement . . . and let’s agree to disagree and let’s not dox or intimidate her[.] She seems completely clueless like there is no tomorrow.”
53. Elsewhere in the chat, G.A. stated: “I think doxxing is important actually[.] Your employers have a right to know you support terrorist organizations[.]”
54. A student named K.A. in the chat agreed, but only in part, “Names and associations sure, personal info like addresses I disagree with[.]”
55. A student named I.A. in the chat stated, “I agree, if you don’t want to be doxxed, don’t support terrorism, or just keep your mouth shut like I do[.]”



56. G.A. got more concrete about how JLSA members could dox students who are Palestinian or perceived to be or associated or affiliated with Palestinians, writing: “What I had in mind was share the names of the E-Board of NLG to Canary Mission, StopAntisemitism.org, etc[.]”
57. Like Canary Mission, StopAntisemitism.org aims to silence Palestinians and allies with accusations of support for terrorism and anti-Semitism and encouraging their large follower base to engage in targeted harassment. The average tweet on @StopAntisemitism garners hundreds of thousands of views.
58. Both Canary Mission and StopAntiSemitism have targeted Palestinian, Arab, and Muslim professors and students at Rutgers, across its law school and undergraduate campuses.
59. A student named L.A. in the JLSA chat expressed interest in G.A.’s references to Canary Mission and StopAntiSemitism, asking, “Yeah, we can’t inform employers?”
60. G.A. explained to her JLSA peers, “[T]hey usually inform employers, current and potential.”
61. L.A. stated in the chat, “If I was an employer I would like to know if I was hiring a terrorist sympathizer[.]”
62. On the morning of October 18, 2023, NLG members, including Palestinian student D.A., received screenshots of the aforementioned JLSA chat and spoke in person with Deans Bond, King, and Regina to inform them of the related doxxing risks facing NLG students because of their support for Palestinian freedom.
63. During the meeting, D.A. emailed the deans a copy of the screenshots and reiterated to the deans that both President Holloway’s one-sided email decrying only the loss of Israeli life and the university’s inaction in response to the doxxing of A.A. (a Palestinian and Muslim student) and B.A. (a South Asian and Muslim student) had turned on a green-light for the proliferation of anti-Palestinian hostility on campus. D.A. again urged the deans to take concrete, swift action to stand against anti-Palestinian racism, again sharing the suggestions shared already with the Assistant Vice Chancellor and Division of Student Affairs.

64. Once NLG members knew of JLSA members' discussions about doxxing them, they grew very fearful, especially on campus. For example, a student named A.D. was unable to leave home in the days that followed and missed an exam and classes due to paralyzing fear, emailing the dean to express being gripped by distress. Other NLG members feared that abusers from whom they had fled would again find them because JLSA students would widely publicize their respective addresses.
65. In fear for their safety and their families' safety, NLG members taught one another how to remove their information from people search websites to prevent their classmates from accessing their private information.
66. All students of the law school have access to Lexis PeopleSearch, a robust search for public records operated by subscription. NLG students urgently emailed their Lexis representative to remove their information from this database from which they could not opt-out on their own.
67. Overall, NLG members felt anxious, distracted from their schoolwork, isolated, alienated, and on edge, for fear that JLSA members would go through with doxxing them in retaliation for their support of Palestinian lives and liberation.

NLG Students' Efforts to Seek Accountability through the SBA for Anti-Palestinian Racism and Related Targeting

68. On October 26, 2023, the SBA held an open meeting. In attendance were NLG members, who attended the meeting to request that C.A. and G.A. be impeached from their SBA positions, given their involvement in doxxing and/or their encouragement of doxxing, despite the prohibitions on doxxing reflected in the Rutgers Code of Student Conduct and the Anti-Discrimination Clause of the SBA Constitution.
69. Following the SBA meeting, C.A. filed a complaint against the SBA, the NLG, and members of the NLG who had spoken out against C.A. for doxxing students who are Palestinian, perceived to be Palestinian, or associated or affiliated with Palestinians by virtue of their activism.
70. Subsequently, the Office of Student Conduct imposed an immediate suspension on the SBA without any hearing and ceasing all SBA communications public or private (including group chats and emails to the school), meetings, and any SBA business (including delivery of a donation).

71. The SBA appealed its suspension, and a related hearing occurred on November 15, 2023. The SBA's suspension was lifted, but the SBA remains prohibited from holding the impeachment vote on SBA members C.A. and G.A. until the complaints are resolved.

Deliberate Indifference to JLSA Members' Contemplation of Doxxing NLG Members for Their Support of Palestinian Freedom

72. Doxxing is prohibited under Rutgers University Policy 10.2.11, Code of Student Conduct, Sections 6(VI)(A, E, H, and J). The prohibitions defined in the Code of Student Conduct apply both to individual students and to student groups. Section 6(III)(A) specifies the university's authority to enforce its policies both on its premises and in connection with off-campus conduct that affects a "University Interest." Under Section 6(II), the university's interests should be understood to extend to doxxing because of its implications for student safety and security.
73. Prior to October 19, 2023, students who are Palestinian, perceived to be Palestinian, or associated or affiliated with Palestinians asked university officials to affirm students' right to not face anti-Palestinian discrimination on campus, urging them to take measures to protect students from it. In response, Dean Bond sent an October 19 communication to the law school, in which the dean professed assorted commitments that students who are Palestinian, perceived to be Palestinian, or associated or affiliated with Palestinians have yet to see materialize meaningfully.
74. In response, such students again urged Dean Bond to make a specific and clear statement to the university community (1) defending their right to engage in advocacy in support of Palestinian lives and liberation and (2) condemning the doxxing of students specifically for being Palestinian, being perceived to be Palestinian, or associating or being affiliated with Palestinians.
75. Palestinian student D.A. emailed Dean Bond specifically to reiterate the dangers of law students' engaging in doxxing against her and her peers: "As law students, every single one of us has access to Lexis PeopleSearch which has private information, including my address. These students can now put me and my family in harm's way, regardless of whatever efforts I personally make."
76. Other students also emailed the dean to reiterate the need for a clear and specific statement from her to the law school community.

77. Dean Bond never replied to these requests from D.A. and other students.
78. On February 16, 2024, the Rutgers University Senate passed a resolution defending academic freedom, “urg[ing] the Rutgers administration to take more proactive and effective measures to prevent members of the Rutgers community from being doxxed and harassed for exercising their right to free speech, and to protect those who have already been targeted,” and “encourag[ing] the Rutgers administration to provide comprehensive support to students, staff, and faculty members who have been publicly maligned or defamed . . . includ[ing], but not be limited to, academic assistance, mental health services, and legal resources to ensure their well-being and the continuation of their academic and professional pursuits without fear of retribution or stigma.”
79. To date, university officials have not affirmatively reached out to offer support or assistance to the two doxxed students (A.A., who is Palestinian and Muslim, and B.A., who is South Asian and Muslim) or the students whom JLSA members contemplated doxxing (the members of NLG, who support Palestinian lives and liberation).
80. Since October 2023, assorted NLG members have filed complaints to the campus in connection with JLSA-related conduct, including the following five NLG members: N.A., I.B., O.A., D.A., and A.D..
81. The students understand from law school personnel that complaints made against individuals are treated as individual-conduct complaints and that complaints made against student organizations are treated as organizational-conduct complaints.
82. On October 16, 2023, Dean Katherine Perez interviewed N.A. concerning N.A.’s JLSA-related complaint. During that meeting, N.A. relayed to Dean Perez the understanding that Palestinian student A.A. had already been doxxed by JLSA member C.A., in a situation stemming from a JLSA email thread, and N.A. encouraged Dean Perez to investigate the situation further.
83. In response, Dean Perez conveyed to N.A. that the campus’s complaint process constituted an accountability mechanism and would provide complainants the opportunity to seek accountability.

84. In the remainder of October 2023, the Office of Student Conduct interviewed I.B., O.A., and D.A. in connection with their JLSA-related complaints.
85. On November 15, 2023, Dean Perez interviewed A.D. in connection with A.D.'s JLSA-related complaint. In the meeting, A.D. asked Dean Perez if she was the final NLG student being interviewed in connection with complaints against JLSA and/or JLSA members.
86. Dean Perez confirmed to A.D. that hers was the last such interview.
87. On November 9, 2023, N.A. followed up with Dean Perez for a status-update, and the dean conveyed to N.A. that the JLSA-related investigations were still ongoing.
88. On November 29, 2023, N.A. again followed up with Dean Perez on the status of the JLSA-related complaints. Dean Perez replied to N.A. on November 30, 2023, stating, "Good Morning [], Thank you for your email and for following up. I can let you know that we have wrapped up our meetings with all parties involved and will be moving forward with a decision shortly."
89. NLG students received no further communication from the law school on the status of their complaints against JLSA and/or its members until February 28, 2024—when Palestinian student D.A. received notification, without explanation, that her complaint had been transferred by the General Counsel of the university to Rutgers New Brunswick on February 6, 2024.
90. Since then, the law school has serially scheduled and canceled hearings on the NLG students' JLSA-related complaints.
91. To date, no hearings have occurred.
92. In contrast to the 60-day time-frame for the resolution of student conduct complaints that university personnel had stated to students was typical, approximately 182 days (6 months) have passed since the filing of the NLG students' JLSA-related complaints.
93. To date, C.A. has not faced accountability for doxxing a Palestinian, Muslim classmate (A.A.) and a South Asian, Muslim classmate (B.A.) or for putting NLG members, who are associated with Palestinian identity by virtue of their activism in support of Palestinian lives, at risk for doxxing by JLSA members.

94. To date, G.A. has not faced accountability for maligning Palestinian classmate D.A. in the Minority Student Group chat space or for putting NLG members, who are associated with Palestinian identity by virtue of their activism in support of Palestinian lives, at risk for doxxing by JLSA members.
95. Other JLSA members and JLSA as a student organization have not faced accountability for putting NLG members, who are associated with Palestinian identity by virtue of their activism in support of Palestinian lives, at risk for doxxing by JLSA members.
96. With no accountability yet for JLSA's conduct targeted to NLG members and other students supporting Palestinian lives and liberation, anti-Palestinian racists on campus have grown emboldened to further target, silence, censor, and harass Palestinians and those perceived to be or associated with Palestinians, in escalating ways, as this complaint details.

Anti-Palestinian Censorship by the Law School

97. On October 30, 2023, NLG displayed a memorial in the law school atrium listing the names of the over 6,000 people who had been killed so far in the genocide of the Israeli government against Palestinians in Gaza. The memorial consisted of a list of names, hanging down over three stories from the railings on the spiral staircase at the center of the atrium. Two security guards had been on duty while students were installing the memorial, one of whom checked the students' IDs to ensure they were permitted to be there.

