

February 12, 2024

**VIA E-MAIL**

Hon. Catherine Lhamon  
Assistant Secretary for Civil Rights U.S. Department of Education  
Office for Civil Rights  
400 Maryland Avenue, S.W., 4th Floor  
Washington, D.C. 20202  
Catherine.Lhamon@ed.gov

Zachary Pelchat  
California Office for Civil Rights  
San Francisco Office  
U.S. Department of Education  
50 United Nations Plaza  
San Francisco, CA 94102  
OCR.SanFrancisco@ed.gov

**Re: Civil Rights Violations at Chapman University**

**I. Introduction**

Eli Schechter is a Jewish student at Chapman University (“Chapman”), who, along with many other Jewish students, has been unlawfully excluded from the recognized student organization, Chapman Students for Justice in Palestine (“CSJP”), on the basis of his Jewish ancestral and ethnic identity. CSJP also subjects Jewish students and those it believes may be Jewish to a litmus test: it denies access to club membership and events if the student does not deny his or her support for the Jewish State of Israel, which is an integral component of Jewish identity for many Jewish students. CSJP does not apply the same litmus test to students it does not perceive to be Jewish, e.g., persons who have surnames that do not “sound Jewish.” In one instance, Mr. Schechter, who wished to join CSJP to learn more about it, was blocked from entering a CSJP event. A university administrator, who was present and aware of the discriminatory exclusion, affirmed CSJP’s decision to deny his admission.

(b)(6); (b)(7)(A);  
(b)(7)(C) another Jewish student denied membership by CSJP, was subjected to a death threat as well as other unlawful harassment on the basis of her Jewish identity, by a CSJP member who threatened her because she is a Zionist—i.e., a supporter of the Jewish State’s right to exist and defend itself from attack. She reported the death threat, but the University has failed to take effective steps to ensure her safety on campus, allowing the perpetrator to live on and move freely about the campus.

These incidents demonstrate that Chapman is failing to protect Jewish students and is denying them equal access to educational opportunities on the basis of their actual or perceived shared ancestry and ethnicity in violation of Title VI of the Civil Rights Act of 1964 (“Title VI”).

For the following reasons, and as detailed more fully in this Complaint, Mr. Schechter, (b)(6); (b)(7)(A);  
(b)(7)(C) and the Louis D. Brandeis Center for Human Rights Under Law (the “Brandeis Center” or “LDB”) request that the Office for Civil Rights (“OCR”) initiate an investigation of Chapman University, a recipient of federal financial assistance,<sup>1</sup> for violations of Title VI and the statute’s implementing regulations.<sup>2</sup>

## II. Statement of Facts

### A. CSJP is Chapman’s Branch of a National Anti-Jewish Hate Group.

Students for Justice in Palestine is a national student organization with chapters on many campuses, including Chapman. The group is known for “explicitly endors[ing] the actions of Hamas and their armed attacks on Israeli civilians” and calling for students to join them in “confronting and ‘dismantling’ Zionism on U.S. college campuses.”<sup>3</sup> Chapters at a number of schools, including Fordham, Rutgers, Brandeis, and George Washington Universities, have been banned or suspended.<sup>4</sup>

---

<sup>1</sup> See Kaitlyn Schallhorn, *Chapman University granted \$2.2 million in federal funds for climate change research*, ORANGE COUNTY REGISTER, (Apr. 14, 2023), <https://www.oregister.com/2023/04/14/chapman-university-granted-2-2-million-in-federal-funds-for-climate-change-research/>.

<sup>2</sup> See 42 U.S.C. § 2000d *et seq.*; see also 34 CFR §§ 100.3(b)(1)(i), (iv), (vi).

<sup>3</sup> See <https://www.adl.org/resources/backgrounders/students-justice-palestine-sjp>.

<sup>4</sup> See <https://www.jpost.com/diaspora/antisemitism/new-york-court-affirms-fordham-university-ban-of-pro-bds-group-669955> (Fordham); <https://wpde.com/news/nation-world/rutgers-suspends-students-for-justice-in-palestine-chapter-over-vandalism-disruption-new-brunswick-new-jersey-university-israel-hamas-middle-east-conflict-sjp> (Rutgers); <https://jewishinsider.com/2023/11/brandeis-becomes-first-private->

Immediately following the October 7 massacre, before Israel had entered Gaza, CSJP released a statement expressing solidarity with the Palestinian “resistance.”<sup>5</sup>

CSJP expresses open hostility towards Jews on campus. For example, CSJP posted a story on Instagram showing a photograph of Dean of Students (b)(6); (b)(7)(A); (b)(7)(C) (b)(6); (b)(7)(C) joining a student in the Jewish ritual of wrapping tefillin juxtaposed with a photograph of Palestinian civilian casualties in Israel’s current defensive war against the terrorist organization Hamas.<sup>6</sup> Between the two photos is a caption reading “this is what (b)(6); (b)(7)(A); (b)(7)(C) supports.” CSJP thus invoked the well-known anti-Semitic trope of blaming an uninvolved Jewish individual for Israel’s alleged wrongdoing in causing the tragic deaths of Palestinian civilians.

CSJP similarly directs hatred towards Jews for whom Zionism forms a core component of their shared ancestral and ethnic identity by erasing the Jewish people’s ancestral connection to the Land of Israel and vilifying Jews who support Israel.<sup>7</sup> It has hosted events describing Zionism as predicated on land theft from the Palestinians and denying an indigenous Jewish connection to the land of Israel, instead holding Israel as a colonialist project.<sup>8</sup> CSJP also expresses this sentiment in its constitution, describing Zionism as “a settler-colonial ideology.”<sup>9</sup>

---

[university-to-ban-students-for-justice-in-palestine-on-campus/](https://www.timesofisrael.com/george-washington-university-suspends-students-for-justice-in-palestine-on-campus/) (Brandeis);  
<https://www.timesofisrael.com/george-washington-university-suspends-students-for-justice-in-palestine-group/> (George Washington). (Rutgers);  
<https://jewishinsider.com/2023/11/brandeis-becomes-first-private-university-to-ban-students-for-justice-in-palestine-on-campus/> (Brandeis);  
<https://www.timesofisrael.com/george-washington-university-suspends-students-for-justice-in-palestine-group/> (George Washington). (George Washington). (Rutgers);  
<https://jewishinsider.com/2023/11/brandeis-becomes-first-private-university-to-ban-students-for-justice-in-palestine-on-campus/> (Brandeis);  
<https://www.timesofisrael.com/george-washington-university-suspends-students-for-justice-in-palestine-group/> (George Washington).

<sup>5</sup> See [https://www.instagram.com/p/CySIMrprJiT/?img\\_index=1](https://www.instagram.com/p/CySIMrprJiT/?img_index=1).

<sup>6</sup> See Exhibit 1.

<sup>7</sup> See <https://www.instagram.com/sjpchapman/>.

<sup>8</sup> See Exhibit 2.

<sup>9</sup> CSJP Const. Art. 2(c).

<https://chapman.campuslabs.com/engage/organization/students-for-justice-in-palestine/documents/view/960852> (“Zionism [i]s a settler-colonial ideology”).

## **B. Chapman SJP Excludes Jewish Students Who Do Not Renounce an Integral Part of Their Jewish Identity, Namely, Their Support for Israel.**

Mr. Schechter is a Jewish student with a Jewish sounding surname (Schechter),<sup>10</sup> who participates in organizations and activities on campus that celebrate the Jewish people's shared ancestral connection to the Land of Israel. In September of 2022, then-junior Mr. Schechter attempted to join CSJP because he wanted to learn their perspective.<sup>11</sup>

On October 14, 2022, Mr. Schechter told (b)(6); (b)(7)(A); (b)(7)(C) Dean of Students that he had been removed from the CSJP listserv and effectively denied admission to the group. Mr. Schechter explained his desire to better understand the Palestinian perspective and that he felt excluded solely on grounds of his Jewish identity. Dean (b)(6); (b)(7)(A) advised him that CSJP was not allowed to exclude him based on his Jewish ethnicity or religion.

Soon after this exchange, on October 18, 2022, Mr. Schechter attended a CSJP meeting. When CSJP members asked him why he was there, he said "I am here to learn." He once again provided his contact information to CSJP but received no further communication from the organization.

## **C. Chapman SJP Has Continued to Exclude Jews on the Basis of Ethnic Identity and Shared Ancestry Within the Last 180 Days.**

Mr. Schechter recently renewed his attempts to affiliate with CSJP for the purposes of learning their perspective and finding common ground by RSVPing for a teach-in event. On October 28, 2023, Mr. Schechter wrote to Dean (b)(6); (b)(7)(A) expressing his plans and his optimism about finding common ground. Mr. Schechter did not receive a confirmation to his RSVP. He nonetheless went to the venue where the event was being held but was denied entry. Dean (b)(6); (b)(7)(A) was present but did not intervene.

---

<sup>10</sup> See <https://www.ancestry.com/name-origin?surname=schechter> ("Jewish (Ashkenazic): occupational name from Yiddish *shekhter* 'ritual slaughterer' (an agent derivative of *shekhtn* of which the stem is from Hebrew *shachat* 'to slaughter').")

<sup>11</sup> Events from 2022 are provided solely for background purposes and Complainants are not requesting an investigation into these matters.

