

Office for Civil Rights  
New York Office  
U.S. Department of Education  
32 Old Slip, 26th Floor  
New York, NY 10005-2500

To Whom It May Concern:

The Lawfare Project is filing this complaint against Columbia University ("Columbia") on behalf of Jonathan Karten ("Jonathan"), a Jewish-Israeli-American undergraduate student, and other members of the Jewish and Israeli communities at Columbia who have been the victims of discrimination on the basis of their national origin, race and religious affiliation. It is important to note at the outset that Jewish and Israeli students at Columbia are being viciously targeted under the guise of political advocacy. That is, the Israeli-Palestinian conflict is used by faculty and students groups to legitimize discrimination against Jewish and Israeli students because of the latter group's race, religion and national identity. The equivalent would be using the conflict with Iran to discriminate against Muslim and/or Iranian students or singling out Chinese students and blaming them for Chinese government policy. Yet, when it comes to Jewish and Israeli students, the Columbia administration has allowed a severely pervasive and hostile environment to persist where said students (and faculty) are harassed, singled out and discriminated against under the guise of "pro-Palestinian" advocacy.

### **JURISDICTION**

This complaint is being brought under *Title VI of the 1964 Civil Rights Act*, 42 U.S.C. § 2000d *et seq.* ("Title VI"). The Office for Civil Rights ("OCR") has jurisdiction over Columbia University, a private university, due to the fact that it receives federal financial assistance from the United States Department of Education ("ED"). Title VI prohibits discrimination based on race and national origin. In recent years, OCR has extended Title VI protections to students of any religion from discrimination, including harassment, based on a student's actual or perceived shared ancestry or ethnic characteristics, or citizenship or residency in a country with a dominant religion or distinct religious identity.<sup>1</sup> Additionally, on December 11, 2019, President Trump issued an Executive Order on Combating Anti-Semitism. This order states in part:

While Title VI does not cover discrimination based on religion, individuals who faced discrimination on the basis of race, color, or national origin do not lose protection under Title VI for also being a member of a group that shares common religious practices. Discrimination against Jews may give rise to a Title VI violation when the discrimination is based on an individual's race, color, or national origin.<sup>2</sup>

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<sup>1</sup> <https://www2.ed.gov/about/offices/list/ocr/religion.html>

<sup>2</sup> <https://www.whitehouse.gov/presidential-actions/executive-order-combating-anti-semitism/>

The Executive Order further states, "It shall be the policy of the executive branch to enforce Title VI against prohibited forms of discrimination rooted in anti-Semitism as vigorously as against all other forms of discrimination prohibited by Title VI."<sup>3</sup> (Emphasis Added)

## FACTS OF COMPLAINT

### **DISCRIMINATION AGAINST JONATHAN KARTEN:**

Jonathan Karten matriculated as an undergraduate student in Columbia's School of General Studies in the (b)(6); (b)(7)(C) however (b)(6); (b)(7)(C) he needed to (b)(6); (b)(7)(C)

(b)(6); (b)(7)(C) It was during this semester that Jonathan first experienced the hatred and vitriol emanating from anti-Semitic, anti-Israeli students and faculty at the university. For the last several years during the month of April, Columbia students and faculty have engaged in Israel Apartheid Week, which is a week-long series of events that target Israelis and Jews and which promote the Boycott, Divestment and Sanctions (BDS) campaign.<sup>4</sup> During this week in 2018, several incidents involving Jonathan and members of the student group Students for Justice for Palestine ("SJP") occurred:

1. Members of SJP shouted "racist" at him as he was engaging with others on the topic of Israel and Judaism;
2. When he approached a table where SJP members were sitting to engage in discussion about possible collaboration, (b)(6); (b)(7)(C)

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

3. He was called a "Zionist pig", "Zio-Nazi", and "genocidire"; and
4. When he spoke Arabic to a friend of his near the SJP table set up near the on-campus library, SJP members demanded that he stop speaking Arabic and stated, "Why don't you come up with your own culture and stop stealing Arabic culture?"

When recounting these events, Jonathan stated that his identity as both a Moroccan and an Israeli Jew was de-legitimized. He said the group's actions made him feel uncomfortable (b)(6); (b)(7)(C) (b)(6); (b)(7)(C) due to the fact that there were SJP members

<sup>3</sup> *Ibid.*

<sup>4</sup> BDS calls for the unlawful commercial boycott of Israelis, and has been declared antisemitic BY AND HAS ITS ORIGINS IN X Y Z ADD HERE

<sup>5</sup> <https://www.adl.org/news/article/a-strategy-of-rejection-the-anti-normalization-campaign>

(b)(6); (b)(7)(C) who gave him nasty glares, pointed at him and singled him out because of his race, religion and national origin.

Several weeks later on (b)(6); (b)(7)(C) Jonathan was again subjected to anti-Semitic and anti-Israeli slurs when he attended the (b)(6); (b)(7)(C) (b)(6); (b)(7)(C) Also in attendance was a (b)(6); (b)(7)(C) (b)(6); (b)(7)(C) who, (b)(6); (b)(7)(C) stated that Jonathan and his Israeli friends were (b)(6); (b)(7)(C) because they were Israeli, and (b)(6); (b)(7)(C) (b)(6); (b)(7)(C)

(b)(6); (b)(7)(C) continued her verbal attacks directed at Jonathan's nationality and religion, at a different location on the Columbia campus shortly after the (b)(6); (b)(7)(C) ended. When she and other (b)(6); (b)(7)(C) saw Jonathan and his Israeli friends, they began shouting that Jonathan and his friends were "genocidal killers" and "white supremacists." Subsequent to this activity, acquaintances of Jonathan's approached him and questioned him as to whether he was racist. They relayed to him that members from SJP had been spreading lies about him to people on campus and were urging students not to associate with him. SJP members were also questioning friends of Jonathan's, asking them, "Why are you friends with that racist?" Feeling targeted, Jonathan (b)(6); (b)(7)(C) during the week of (b)(6); (b)(7)(C) (b)(6); (b)(7)(C) To his knowledge, there was no follow-up by either campus security or the university's administrators. This pattern of indifference and failure to act by the administration will be discussed in further detail below.

In late (b)(6); (b)(7)(C) members of the Columbia SJP were once again advocating for unlawful commercial discrimination against Israelis and Jews under the guise of the BDS campaign. Jonathan noticed a group of SJP students sitting at a table on campus with signs stating that they wanted Columbia to allow a referendum on the issue. One of the students handed Jonathan a flyer and began a conversation with him. Jonathan was hopeful that this conversation would be the beginning of a fruitful dialogue about his faith and identity. However, while Jonathan was speaking, (b)(6); (b)(7)(C) (b)(6); (b)(7)(C) he whispered something to his cohorts, and they all stopped speaking to Jonathan and turned their backs to him.<sup>7</sup>

In (b)(6); (b)(7)(C) Jonathan was involved in an event for (b)(6); (b)(7)(C) (b)(6); (b)(7)(C) While having a discussion at a table during the event with other students, a Columbia professor of Arabic literature, whose name Jonathan was unable to ascertain, approached the table, interrupted the conversation, pointed at Jonathan and yelled, "Don't believe a word he is saying. He is Mossad."<sup>8</sup> Once again, Jonathan felt ridiculed and embarrassed due to someone in authority publicly targeting him, accusing him of being a spy for

<sup>6</sup> <https://en.wikipedia.org/wiki/Abeed>

<sup>7</sup> <https://www.learnreligions.com/chai-in-judaism-2076800>

<sup>8</sup> The Mossad is the national intelligence agency of Israel and is responsible for intelligence collection, covert operations, and counterterrorism.

a foreign government because of his religion and national identity. The racist nature of this accusation cannot be overstated. It should be noted that while Jonathan has felt extremely supported by some administrators in the School of General Studies in regards to the discrimination he has experienced due to his religion and Israeli nationality, the same cannot be said of the Columbia administration in general and its' attitude towards the Columbia Jewish and Israeli communities.

The greatest and most personal indignation suffered by Jonathan is also the most recent and was delivered by a tenured member of the Columbia University faculty, Professor Joseph Massad, a professor of Modern Arab Politics and Intellectual History. On November 8, 2019, while giving a speech at the Annual Conference of the Jerusalem Fund and Palestine Center, Professor Massad stated in part:

"The Oslo Accords inaugurated this process of liquidating the Palestinian national struggle while the 'Deal of the Century' plans and hopes to conclude it...The only thing standing in its way is the ongoing Palestinian resistance to Israeli settler colonialism and racism that continues inside Israel and Jerusalem, the West Bank, and Gaza; the ongoing Marches of Return in Gaza; and the armed resistance of the Izz al-Din al-Qassam Brigades to Israeli invasions in Gaza."<sup>9</sup>

The Izz al-Din al-Qassam Brigades is the military wing of Hamas, which is a U.S.-designated foreign terrorist organization. Izz al-Din al-Qassam has killed more than 650 civilians.<sup>10</sup> It is also directly responsible for the kidnapping and brutal murder of Jonathan's uncle, Sharone Edri Z"L. However, according to Professor Massad, this group's killing of innocent Israeli citizens, like Jonathan's uncle and countless others, is justified due to Israel's "settler colonialism." He also implied that these acts of terror help prevent "the liquidation of the Palestinian national struggle." It should be noted that Ranimad, the orchestrator of the murder of Jonathan's uncle, was released, and he then went on to organize the kidnapping and murder of three young Israeli-Jewish students. Jonathan lamented in a post on his personal Facebook page that this "smut" from Professor Massad was "being passed as an education..."<sup>11</sup> The outrage in the Jewish community following these racist remarks by Professor Massad was swift. Numerous Jewish media outlets printed articles on the incident, and the Columbia Chapter of SSI immediately sent a letter to the President of Columbia, Lee Bollinger, asking that the university "distance and disassociate" itself from Massad's remarks.<sup>12</sup> Neither Bollinger nor any other representative from the university responded to the SSI letter. Nor were any steps taken by the

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<https://www.algemeiner.com/2019/11/18/tenured-columbia-professor-proudly-supports-terrorism-against-israel/>

<sup>10</sup> *Ibid.*

<sup>11</sup> <https://www.facebook.com/jkarten/posts/10215072181464713>

<sup>12</sup>

<https://www.facebook.com/SSIColumbia/photos/a.476258195887312/1294534540726336/?type=3&theater>

administration to condemn Massad's remarks or reach out to the Jewish and Israeli communities or to Jonathan himself.

It should be noted that Professor Massad's remarks in November of 2019 are not an aberration. Rather, they are part of a larger pattern of anti-Jewish/anti-Israeli rhetoric that Massad has engaged in for many years, despite the fact that he is part of a large community that includes Jewish and Israeli students and faculty. Canary Mission, a group that documents people and groups that promote hatred of the United States, Israel, and Jews on North American college campuses has reported the following on Professor Massad:

1. In 2002, Massad reportedly stated, "The Jews are not a nation...The Jewish state is a racist state that does not have a right to exist."
2. Massad has denied the Jews historical connection to Israel. For example, in a May 2013 editorial titled "The Last of the Semites," Massad claimed that the basis of Jews' belief in the land of Israel as their homeland originated in "the Protestant Reformation with its revival of the Hebrew Bible." Massad also claimed that European anti-Semitism was the foundation of the Zionist movement and Jews' desire to immigrate to the Land of Israel.
3. In an earlier editorial, Massad described Zionism as an "anti-Semitic project" focused on "destroying Jewish cultures and languages in the diaspora in the interest of an invented Hebrew that none of them [Jews] spoke, and in the interest of evicting them [Jews] from Europe and transporting them to an Asian land to which they had never been."
4. In his May 2013 editorial, Massad also accused Jewish Zionists of complicity in the creation of anti-Semitism and the Holocaust, and likened Israeli Jews to Nazis.
5. Massad, while portraying Israel as inherently anti-Semitic and racist, has written that the Nazis "not only killed 90 percent of European Jews, but in the process also killed the majority of Jewish enemies of Zionism who died precisely because they refused to heed the Zionist call of abandoning their countries and homes."
6. In a 2003 essay, Massad wrote that "the ultimate achievement of Israel" is "the transformation of the Jew into the anti-Semite, and the Palestinian into the Jew."
7. In a 2004 essay, he argued that "the real victims of Western anti-Semitism are Arabs and Muslims... and no longer Jews," thereby denying that the Jewish people as a minority group are subjected to discrimination.
8. One person claimed that Massad ordered a Jewish student to leave his classroom after she told Massad that Israel provides civilians with advanced warnings before attacks.
9. In 2011, a Jewish student claimed that she was discouraged by a Barnard College professor from taking one of Massad's courses and that the professor informed her that partaking in the class would be "uncomfortable" for her.<sup>13</sup>

Many, if not all, of Professor's Massad's statements fall squarely within the International Holocaust Remembrance Alliance ("IHRA") *Working Definition of Anti-Semitism*, which has been utilized by OCR in recent cases, such as the decision to re-open an OCR complaint filed against Rutgers University wherein religious discrimination against Jewish students was alleged.<sup>14</sup> Additionally, President Trump's Executive Order on Combating Anti-Semitism states that "all

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<sup>13</sup> [https://canarymission.org/professor/Joseph\\_Massad](https://canarymission.org/professor/Joseph_Massad)

<sup>14</sup> <https://www.nytimes.com/2018/09/11/us/politics/rutgers-jewish-education-civil-rights.html>

executive departments and agencies (agencies) charged with enforcing Title VI **shall consider...** the non-legally binding working definition of anti-Semitism adopted on May 26, 2016, by the International Holocaust Remembrance Alliance (IHRA)..."<sup>15</sup> (Emphasis added)

### ***DISCRIMINATION AGAINST OTHER JEWISH AND ISRAELI MEMBERS OF THE COLUMBIA COMMUNITY:***

Sadly, Jonathan is not the only Jewish and Israeli student at Columbia who has been the victim of discrimination based on his national origin and religion. Many Jewish and Israeli members of the Columbia community have had similar experiences. Below are multiple examples of victimized community members who have spoken publicly about the discrimination and harassment they have experienced at Columbia University. The experiences of these individuals indicate that the discrimination against the Jewish and Israeli communities at Columbia is hostile, pervasive, and ongoing. The administration has direct knowledge of this hostile environment, and it has done nothing to remediate it.

1. Students Supporting Israel ("SSI") is an official student group at the university whose mission is to be a pro-Israel voice at Columbia and to support students in grassroots pro-Israel advocacy. This group consists of Jewish and Israeli students. Unfortunately, over the last several years, the members of SSI have been the victims of a targeted harassment and discrimination campaign by the on-campus anti-Semitic and anti-Israel groups Columbia University Apartheid Divest ("CUAD"), Students for Justice for Palestine ("SJP"), and Jewish Voice for Peace ("JVP"). Examples of the discriminatory, hostile conduct towards SSI, much of which was captured on video, include:
  - members of SJP and JVP defacing and covering up SSI flyers advertising Jewish events;
  - SJP students staging a loud disruption by calling for "Intifada"<sup>16</sup> right next to SSI's commemoration of Holocaust Remembrance Day;
  - Jewish student members of SSI being ejected from an event co-hosted by SJP, JVP, and CUAD with no explanation given;
  - the disruption of a speech by Israel's envoy to the United Nations by members of SJP CUAD; and
  - when four Jewish SSI students were leaving an on-campus event for an Israeli beauty queen, nearly fifty SJP members surrounded them screaming anti-Semitic and anti-Israel chants.

SSI submitted multiple complaints to the administration detailing the treatment of their group and their treatment as individuals by the aforementioned anti-Israel. In April of 2018, SSI submitted a comprehensive incident report to the university's Student Governing Board ("SGB") noting that the conduct of SJP, CUAD, and JVP was against

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<sup>15</sup> <https://www.whitehouse.gov/presidential-actions/executive-order-combating-anti-semitism/>

<sup>16</sup> Intifada is a call for armed terroristic resistance against Israel and Jews

the university's Rules of Conduct and was creating a hostile environment for them.<sup>17</sup> A copy of SSI's complaint to the administration has been attached hereto as *Exhibit 1*. We respectfully request that OCR read the SSI complaint in its entirety as it contains numerous examples of the discrimination and harassment Jewish and Israeli members of SSI have experienced due to their religion, race and national origin. This complaint was supported by letters from two major Jewish, non-profit organizations, the Zionist Organization of America and The Lawfare Project.<sup>18</sup> When no response was forthcoming, sixty-five education and civil rights organizations sent a joint letter to President Bollinger urging him to take action and remediate the hostile environment which presently existed on campus for this SSI chapter.<sup>19</sup> All of these efforts fell upon deaf ears. Instead of remediation, SSI received the "run-around." They were shuffled from one administrator to another being told that the complaint was in front of the wrong body, and then, ultimately, the complaint was dismissed. At one point, they were told by Professor Suzanne Goldberg, the Executive Vice President for University Life at Columbia, that there was nothing that could be done.<sup>20</sup> Emboldened by the fact the university continually refused to take action against it, SJP published a statement in April of 2109 advocating for the boycott of Jewish organizations on campus, and a rejection of Zionism-the civil rights movement of the Jewish people. SJP issued this statement after SSI invited SJP and JVP to discuss the Palestinian-Israeli conflict.<sup>21</sup> SJP's effort to isolate SSI, a group consisting of Jewish and Israeli students, was yet another act of blatant discrimination and clearly against university rules. Columbia's toleration of this type of discrimination is a clear violation of federal law. Given the public nature of what was occurring and the publicity surrounding it, it is inconceivable that the administration was unaware of SJP's efforts and its flagrant violations of campus policy. However, the university once again failed to take any steps to protect the members of the Jewish and Israeli communities at Columbia from discrimination and harassment and, in doing so, allowed a hostile environment to persist and flourish.

2. A current Columbia student, who out of fear of retaliation would prefer to remain anonymous at this time, wrote the following account to The Lawfare Project about discrimination she has experienced due to her religion and (b)(6); (b)(7)(C)

I am (b)(6); (b)(7)(C) On the day of the (b)(6); (b)(7)(C) at Columbia College (b)(6); (b)(7)(C) I went to stand with my friend [Jonathan Karten] in line and the students

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<sup>17</sup> [https://drive.google.com/file/d/1lfi\\_MNCBtDvrTNF4s-PyAXm386Zz0EYR/view](https://drive.google.com/file/d/1lfi_MNCBtDvrTNF4s-PyAXm386Zz0EYR/view)

<sup>18</sup> <https://www.cu-monitor.com/post/ssi-harassment-complaint>

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<https://amchainitiative.org/wp-content/uploads/2018/05/Letter-to-Columbia-President-Bollinger-5.15.18.pdf>

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<https://nypost.com/2018/09/29/israeli-student-at-columbia-says-shes-being-bullied-by-palestinian-group/>

<sup>21</sup>

<https://jewishjournal.com/news/nation/297796/columbia-sjp-calls-for-boycotting-pro-israel-groups-on-campus/>

started (b)(6); (b)(7)(C) I said "Don't worry darling. I am not cutting the line." He [one of the students] said, "He's not your fucking darling" followed by (b)(6); (b)(7)(C) which I do not specifically remember. Because it [this behavior] has been so normalized, I felt it was not an option for me to even complain to anyone about this. Regardless, I can still recognize the student's face.

The next day, I was walking on campus on my way to enter (b)(6); (b)(7)(C) As I passed, there was a group of about three or four students who were present at (b)(6); (b)(7)(C) (b)(6); (b)(7)(C) No previous interactions between us had happened. And yet, one of the girls that stood there looked at me and said, (b)(6); (b)(7)(C) (b)(6); (b)(7)(C) I walked away shocked, not looking at her or saying anything.

3. In April of 2019, a senior at Barnard College stated, "I don't think the Barnard or Columbia administration is focusing on the well-being of Jewish students—at all. The question on campus is always 'how does this make Muslim or Palestinian students feel marginalized?' When Jewish students and faculty explain that they feel marginalized, they aren't taken seriously."<sup>22</sup>
4. In April of 2019, a faculty member at Columbia stated, "Even as a 35-year-old professional, my heart beats fast and I'm scared to see the shouting and anger that comes with IAW [Israel Apartheid Week...I avoid the main campus as much as I can during IAW for my own mental health. I am scared as a Jew—not as a Zionist."<sup>23</sup>
5. In April of 2019, a student at Columbia stated, "I know there is a lot of anti-Semitism on this campus—and unfortunately I've witnessed it...Some of the things I've heard are just outrageous and the thing is there is a double standard when it comes to what [Students for Justice in Palestine members] see as racist."<sup>24</sup> When describing a lecture on Palestine she attended during Israel Apartheid Week, this same student stated, "The professor said that Hebrew was a made-up language—and if someone said that about the Spanish language, I would be furious, the whole university would be furious.... But the students there were not furious."<sup>25</sup>
6. In September of 2019, a Columbia undergraduate student who is an Israeli national and a former officer in the Israel Defense Forces ("IDF") gave an interview to the *New York Post* in which she stated that SJP threatened and harassed her due to her religion and national origin and that the school [Columbia] was failing to protect her.<sup>26</sup> The student

<sup>22</sup> <https://www.tabletmag.com/jewish-news-and-politics/283535/enough-is-enough-2>

<sup>23</sup> <https://www.tabletmag.com/jewish-news-and-politics/283535/enough-is-enough-2>

<sup>24</sup> <https://www.haaretz.com/us-news/.premium-israeli-apartheid-week-or-hebrew-liberation-week-it-depend-s-where-you-stand-1.7090908>

<sup>25</sup> <https://www.haaretz.com/us-news/.premium-israeli-apartheid-week-or-hebrew-liberation-week-it-depend-s-where-you-stand-1.7090908>

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<https://nypost.com/2018/09/29/israeli-student-at-columbia-says-shes-being-bullied-by-palestinian-group/>

stated, "SJP is violent...I'm worried about my safety."<sup>27</sup> The student recounted that, in the fall of 2017, she was having a conversation in Hebrew and "[a] girl heard me and started screaming, 'Stop killing Muslim babies! ...You're a murderer!' ... Then, she screamed, 'Zionist, get out!' A nearby public-safety administrator did nothing."<sup>28</sup> The student further stated that, in March of 2019, SJP members screamed "terrorist" at her and others who were handing out literature during Hebrew Liberation Week at Columbia.<sup>29</sup> The student relayed that her efforts to file formal complaints with the university were unsuccessful. At one point, she met with Professor Suzanne Goldberg, the Executive Vice President for University Life, and requested protection from SJP and asked that disciplinary action be taken against them. According to the student, Professor Goldberg refused and recommended that the student "put the school's public-safety number on speed dial."<sup>30</sup>

7. On November 28, 2018, the office of Elizabeth Midlarsky, a Jewish professor at Columbia's Teachers College who teaches and researches the Holocaust, was vandalized with swastikas and anti-Semitic slurs.<sup>31</sup> The graffiti was drawn in the entryway to Midlarsky's office, which is not shared with other staff.<sup>32</sup> Professor Midlarsky told the *Columbia Daily Spectator* that she was "in shock" and "stopped for a moment because I couldn't believe what I was seeing."<sup>33</sup> Brian Cohen, the Executive Director of the Columbia/Barnard Hillel, stated to *The Algemeiner* that "Jewish students and professionals on campus are outraged...The students with whom my colleagues and I spoke to today are on edge and angry..."<sup>34</sup> The Vice President of SSI told the same publication that "people are distressed" and stated that the incident was a product of "the environment here on campus," which is "a breeding ground for these kinds of events."<sup>35</sup>
8. In May of 2018, a recent graduate of Columbia stated, "There have been many antisemitic occurrences on campus and talks against Jewish students, and the university has done nothing to protect us."<sup>36</sup>

All of the events recounted above and the statements of the students/faculty were publicized in the media at some point. As such, Columbia is presumed to have had notice of the sentiments of these students and the discrimination they experienced as members of the Jewish and Israeli communities at the university. Despite this knowledge, the Columbia administration has taken

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<sup>27</sup> *Ibid.*

<sup>28</sup> *Ibid.*

<sup>29</sup> *Ibid.*

<sup>30</sup> *Ibid.*

<sup>31</sup><https://www.columbiaspectator.com/news/2018/11/29/teachers-college-professors-office-vandalized-with-anti-semitic-graffiti/>

<sup>32</sup> *Ibid.*

<sup>33</sup> *Ibid.*

<sup>34</sup><https://www.algemeiner.com/2018/11/30/jewish-students-at-columbia-university-outraged-distressed-by-antisemitic-graffiti-on-campus/>

<sup>35</sup><https://www.algemeiner.com/2018/11/30/jewish-students-at-columbia-university-outraged-distressed-by-antisemitic-graffiti-on-campus/>

<sup>36</sup> <https://www.algemeiner.com/2018/05/18/columbia-university-fosters-hate-and-anti-israel-incitement/>

no steps to remediate the hostile environment or to address the discrimination experienced by the Jewish and Israeli communities.

***COLUMBIA'S DELIBERATE INDIFFERENCE AND FAILURE TO ACT AGAINST THE DISCRIMINATION DIRECTED AT JEWISH AND ISRAELI MEMBERS OF ITS COMMUNITY HAS CREATED A HOSTILE ENVIRONMENT AND IS A VIOLATION OF TITLE VI:***

In 2016<sup>37</sup> and in 2017,<sup>38</sup> Columbia had the dubious distinction of being ranked near the top of *The Algemeiner's* "List of 40 Worst Colleges for Jewish Students." The rationale for including Columbia on this list included dozens of reports of anti-Semitic activity, employing over two dozen faculty members who actively support unlawful commercial boycotts against Jewish and Israeli persons, and anti-Semitic student groups, which "have monopolized the conversation on campus relating to the Israeli-Arab conflict and have systematically maligned, harassed and silenced ... pro-Israel voices."<sup>39</sup> However, Columbia's inclusion on this list for two consecutive years and the ensuing negative publicity, which was clearly known to the administration, did nothing to compel the university to take the necessary steps to make its campus less hostile for Jewish and Israeli students and faculty. In fact, quite the opposite occurred. The administrators at Columbia, despite having knowledge of the hostile environment which exists for the Jewish and Israeli communities at the university and having had numerous opportunities to remedy it, have failed to do so.

Below are several examples of the administration's failure to act:

1. On October 27, 2018, the worst mass killing of Jews in American history occurred when an armed gunman opened fire in a synagogue in Pittsburgh and murdered eleven congregants as they prayed. Jews all over the nation and at Columbia were horrified at the senseless slaughter, which was clearly anti-Semitic in nature. If there was ever a time the Jewish community at Columbia needed words of comfort and inspiration from the administration, this was it. Sadly, the school did not deliver. Although Executive Vice President for University Life Professor Suzanne Goldberg released a statement condemning the attacks, she failed to directly acknowledge the Pittsburgh shooter's anti-Semitic motives.<sup>40</sup> She also took the opportunity to note "the growing number of attacks on people of marginalized identities and faiths."<sup>41</sup> Unsurprisingly, Professor Goldberg's statement left the Columbia Jewish community disheartened and frustrated.<sup>42</sup> According to the school newspaper, the *Columbia Daily Spectator*, "many Jewish students and alumni expressed their frustration with the University's statement for failing

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<sup>37</sup> <https://www.algemeiner.com/the-40-worst-colleges-for-jewish-students-2016/>

<sup>38</sup> <https://www.algemeiner.com/the-40-worst-colleges-for-jewish-students-2017/>

<sup>39</sup> <https://www.algemeiner.com/the-40-worst-colleges-for-jewish-students-2017/>

<sup>40</sup> <https://www.columbiaspectator.com/news/2018/10/31/university-revises-statement-on-pittsburgh-shooting-in-response-to-criticism-from-students-alumni/>

<sup>41</sup> *Ibid.*

<sup>42</sup> *Ibid.*

to directly acknowledge the Pittsburgh shooter's anti-Semitic motives and to address the national rise of anti-Semitism. The statement referenced victims of other recent attacks, including hate crimes against LGBTQ and black Americans; yet, it made no explicit mention of Jews or anti-Semitism."<sup>43</sup> One student commented, "By using vague, non-specific language, they seemed to be dancing around the fact of the Jewishness and anti-Semitism of the event...They universalized the tragedy by never once using Jewish language, which is problematic in addressing a community's tragedy."<sup>44</sup> It was only after immense public backlash from multiple media outlets and enraged alumni that the administration issued a revised statement that actually acknowledged the anti-Semitic nature of the attack.<sup>45</sup>

2. For the last several years, students and faculty at Columbia have participated in Israel Apartheid Week in the beginning of April. In April of 2019, Columbia University Apartheid Divest ("CUAD"), a student group that promotes the boycott campaign against Israeli and Jewish persons, decided to advertise its events with a horrifying anti-Semitic flyer. A Columbia student wrote the following description about the flyer:

In the bottom right corner of the cartoon, an Israeli soldier is depicted with a red protrusion sticking out of his helmet, which horrifyingly resembles a horn. The portrayal of a Jew as a horned devil's worker is centuries old hate propaganda. I am shocked and terrified to see a student group promoting an image that evokes the Nazi hate propaganda that vilified Jewish people under Adolf Hitler's tyranny. The symbol of a Jew with horns is completely irrelevant to CUAD's pro-BDS agenda, which seeks "to support Palestinian human rights." Yet during their annual Israeli Apartheid Week (April 1-4), everywhere I looked on campus, from stairwells to news feeds to lobbies, a cartoon of a Jewish person with a bright red horn sticking out of his head glared back at me.<sup>46</sup>

When this student expressed to members of CUAD his fear of the cartoon being displayed prominently throughout campus, his concerns were dismissed.<sup>47</sup> Given the prominent, public display of this poster in multiple areas of the campus, the administration knew or should have known of its existence. However, no one in the administration took any steps to have the posters removed from public display on the campus or to address the Columbia community at large as to the discriminatory nature of the posters. The administration, under its own policies and under the mandates of federal law, has a duty to stop discrimination as soon as it becomes of its existence, regardless of whether it receives a formal complaint. Columbia, in this instance and many others, failed to live up to its legal obligations.

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<sup>43</sup> *Ibid.*

<sup>44</sup> *Ibid.*

<sup>45</sup> *Ibid.*

<sup>46</sup> <https://blogs.timesofisrael.com/zero-tolerance-for-anti-semitic-hatred/>

<sup>47</sup> *Ibid.*

3. Professor Hamid Dabashi is a Columbia Professor of Iranian Studies and Comparative Literature. Similar to his colleague Joseph Massad, he has a history of making anti-Semitic remarks, equating Israel with Nazi Germany and ISIS, and accusing Jewish citizens of having dual loyalties. All of this behavior falls well within the IHRA *Working Definition of Anti-Semitism*. Columbia is well aware of Dabashi's anti-Semitic and anti-Israeli rhetoric, yet allows him to continue with this rhetoric unimpeded, despite the fact that his behavior blatantly violates Title VI and Columbia's internal policies on discrimination. Professor Dabashi's Facebook posts and writings are replete with anti-Semitic and anti-Israel tropes. Below are several examples:

- In 2016, he alluded to the anti-Semitic trope of Jewish dual loyalty in a Facebook post saying that Hillary Clinton choose Israeli Prime Minister Netanyahu as her running mate, stating, "...it...will...put an end to this charade that the US/Israel are two countries AIPAC -- and their stooges in the US congress will no longer need to act as the Fifth Column of a foreign country..."<sup>48</sup>
- "The majority of Israelis... are delusional fanatics who have worked themselves into a frenzied stupour [sic] to murder more Palestinians, steal more of Palestine...and do whatever other murderous mischief is necessary to convince them from within...that they are right and the whole world is wrong."<sup>49</sup>
- In May of 2018, he posted on Facebook, "Every dirty treacherous ugly and pernicious happening in the world just wait for a few days and the ugly name 'Israel' will pop up in the atrocities,"<sup>50</sup> making the anti-Semitic charge that everything bad in the world can be blamed on the Jews and their state.
- In May of 2018, he posted on Facebook, "These laughing hyaenas-the Zionists the Saudis and the US neocons are f\*\*\* with the wrong country-in their stupidity and ignorance they...will be badly defeated..."<sup>51</sup>

With these last two posts, the Jewish community erupted. Jewish student groups at Columbia denounced the statements as "despicable" and "anti-Semitic."<sup>52</sup> Rabbi Blum, the co-director of the Columbia Chabad, stated, "My wife Keren and I, in recent years, have seen a dramatic uptick in the amount of students who are seeking shelter from the intimidation they are feeling on campus due to increasing anti-Israel and anti-Jewish comments and incidents in the classrooms and on campus."<sup>53</sup> A coalition of over 250 Columbia alumni, students, faculty, and community members sent a letter to the Columbia administration urging it to publicly condemn Dabashi's postings, and affirm that

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<sup>48</sup> <https://www.facebook.com/dabashi/photos/a.268551769831776/1149228988430712/?type=3&theater>

<sup>49</sup> <https://www.alaraby.co.uk/english/comment/2015/3/23/why-do-we-write>

<sup>50</sup> <https://www.facebook.com/dabashi/posts/1787752684578336>

<sup>51</sup> *Ibid.*

<sup>52</sup> <https://www.algemeiner.com/2018/05/09/columbia-university-professor-blames-israel-for-every-dirty-treacherous-act-happening-in-the-world-claims-iran-nuke-deal-opposed-by-fifth-column-zionists/>

<sup>53</sup> *Ibid.*

Jewish, Israeli, and pro-Israel students—for whom Zionism and the right of Jewish self-determination are core values—are as welcome as the rest of their peers at Columbia.<sup>54</sup> These pleas fell upon deaf ears. Executive Vice President of Student Life Professor Suzanne Goldberg cited Dabashi's right "freedom of expression" in a reply letter.<sup>55</sup> Although Dabashi has a right to free speech, the university has an obligation to either sanction or condemn this speech when it conflicts with university policies and federal law. Professor Goldberg also bizarrely referenced the presence of a Hillel at Columbia and Columbia's association with Israeli universities and the Jewish Theological Seminary.<sup>56</sup> Professor Goldberg seems to be under the erroneous impression that the First Amendment and Columbia's relationship with Jewish entities somehow negates its obligations under Title VI as well as its obligations to enforce its own policies relating to discrimination.

4. In September of 2019, the Columbia World Leaders Forum invited Malaysian Prime Minister Mahathir Mohamad to speak at the university. Mahathir Mohamad has a well-established record of anti-Semitic rhetoric. In 1970, he wrote in his book *The Malay Dilemma* that "the Jews are not merely hook-nosed, but understand money instinctively."<sup>57</sup> He has also questioned the number of Jews actually killed in the Holocaust.<sup>58</sup> In June of 2019, during a speech he gave at Cambridge University, he stated, "I have some Jewish friends, very good friends. They are not like the other Jews, that's why they are my friends."<sup>59</sup> To the disgust of many, Mohamad's comments were met with laughter by the audience.<sup>60</sup> In spite of all of this, the Columbia World Leaders Forum somehow felt that Mohamad was worthy of a platform at the university. Once again, the Jewish community at Columbia appealed to the administration to protect them against a speaker who would surely inflame the undercurrent of anti-Semitism that already existed at Columbia. They asked that the administration not allow a known anti-Semite to have the distinction of speaking at the university. In a show of unity, three Jewish groups—SSI of Columbia, Aryeh, and J Street U of Columbia—sent a joint letter to President Bollinger detailing Mohamad's anti-Semitic history and imploring Bollinger to show that the university cares about the safety and well-being of its Jewish community.<sup>61</sup> SSI also organized a petition on Change.org calling for President Bollinger to "undertake immediate measures to ensure the safety and well being [sic] of Columbia's Jewish

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<sup>54</sup><http://www.algemeiner.com/2018/05/30/coalition-of-columbia-professors-alumni-students-urge-university-to-discipline-antisemitic-professor-who-blasted-fifth-column-zionists/>

<sup>55</sup><https://www.algemeiner.com/2018/07/10/alumni-group-knocks-columbia-university-for-disappointing-response-to-professor-who-blamed-israel-for-every-dirty-act-in-the-world/>

<sup>56</sup> <https://drive.google.com/file/d/1jv1dMsKE3MVMpf2yelo7eGpZUteINqTF/view>

<sup>57</sup>

<https://forward.com/fast-forward/426130/malaysia-s-prime-minister-mocks-jews-at-british-university-to-audience/>

<sup>58</sup> *Ibid.*

<sup>59</sup> *Ibid.*

<sup>60</sup> *Ibid.*

<sup>61</sup><https://www.algemeiner.com/2019/09/20/columbia-jewish-students-call-for-protection-ahead-of-upcoming-speech-on-campus-by-antisemitic-malaysian-pm/>

students."<sup>62</sup> The SSI correctly noted in its petition that, while Mohamad certainly had the right of free speech, he did not have the "right" to exercise that speech at Columbia.<sup>63</sup> SSI also pointed out that, by allowing Mohamad to give an address on campus, Columbia was not protecting Mohamad's right to free speech. Rather, it was granting the credibility of one of America's most prestigious universities to a vile anti-Semite and was shaking even further the already fragile sense of safety and belonging of Columbia's Jewish students.<sup>64</sup> Despite the eloquence of the students' arguments and the fact that the petition garnered several thousand signatures, the university once again turned a deaf ear to the pleas of its Jewish community. On September 25, 2019, the Prime Minister delivered his scheduled speech and, when asked about his anti-Semitic views, he replied, "I am exercising my right to free speech. Why is it that I can't say something against the Jews, when a lot of people say nasty things about me, about Malaysia, and I didn't protest, I didn't demonstrate?"<sup>65</sup> Similarly to the Columbia administration, the Malaysian Prime Minister showed no remorse in regards to how his behavior has impacted the Jewish community.

## **CONCLUSION**

The discrimination that Jonathan Karten and other members of the Columbia community have experienced due to being Jewish and/or Israeli nationals has been severe, pervasive, and is ongoing. There is presently a hostile environment for Jonathan and others similarly situated at the school. Columbia has had multiple opportunities to address and remediate the discrimination suffered by Jonathan and other unnamed members of the Jewish and Israeli community; yet, it has consistently refused to do so. As such, Columbia is in violation of Title VI, and we respectfully request that the Office for Civil Rights open a formal investigation. Jonathan is prepared to speak with your office and provide a full chronology of the discrimination he has suffered and the school's inadequate response to it.

We appreciate your consideration of this matter.

Respectfully submitted,

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

Brooke Goldstein  
Attorney at Law  
Executive Director of The Lawfare Project

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<sup>62</sup><https://www.change.org/p/students-no-to-antisemitism-at-columbia-no-to-dr-mahathir-mohamad>

<sup>63</sup> *Ibid.*

<sup>64</sup> *Ibid.*

<sup>65</sup> <https://www.jns.org/pro-israel-columbia-student-questions-malaysian-premier-about-holocaust-denial/>

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

Lori B. Tucker  
Attorney at Law  
The Lawfare Project

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

Jonathan D. Karten  
Columbia University, Class of 2020



**UNITED STATES DEPARTMENT OF EDUCATION  
OFFICE FOR CIVIL RIGHTS**

32 OLD SLIP, 25<sup>TH</sup> FLOOR  
NEW YORK, NEW YORK 10005

**RACHEL POMERANTZ**  
DIRECTOR  
NEW YORK OFFICE

November 20, 2023

Sent by email only to [officeofthepresident@columbia.edu](mailto:officeofthepresident@columbia.edu)

Minouche Shafik  
President  
Columbia University  
202 Low Library  
535 West 116th Street, Mail Code 4309  
New York, New York 10027

Re: Case No. 02-20-2063 – Columbia University

Dear President Shafik:

On December 18, 2019, the U.S. Department of Education (the Department), Office for Civil Rights (OCR), received a complaint filed against Columbia University (the University). The Complainant alleged in the complaint and in subsequent follow up that the University discriminated against his client (the Student) and other students on the basis of their national origin (shared Jewish ancestry and/or Israeli) by failing to respond to alleged incidents of harassment of these students by other students and University employees from March 2018 through October 2023.

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

OCR will investigate the following issue: whether the University responded to alleged harassment of students by other students and employees based on national origin (including shared Jewish ancestry and/or Israeli) in a manner consistent with the requirements of Title VI.

Please understand that opening this allegation for investigation does not mean that OCR has made a decision about the allegation. During the investigation, OCR is neutral; OCR will collect and analyze the evidence it needs to make a decision about the allegation. OCR will ensure that

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

[www.ed.gov](http://www.ed.gov)

its investigation is legally sufficient and addresses the allegation as required by OCR's Case Processing Manual (CPM) (July 18, 2022).

Please open this link for additional information about OCR's Complaint Processing Procedures. Individuals who file complaints with OCR may have the right to file a private suit in federal court whether or not OCR finds a violation.

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

Complaint allegations may be resolved in a variety of ways, including through mediation pursuant to Section 201(b) of OCR's CPM. Under 201(b) mediation, if both parties are interested and if OCR determines that the individual allegations are appropriate for mediation, the parties may voluntarily resolve these complaint allegations through mediation that OCR will facilitate. Note that in such a case OCR does not monitor or enforce the agreement reached between the parties. Please inform OCR if you are interested in resolving this complaint through mediation.

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

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

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

If you have any questions, please contact Joy M. Purcell, Senior Compliance Team Attorney, at (646) 428-3766 or [joy.purcell@ed.gov](mailto:joy.purcell@ed.gov); Erin M. Greene, Compliance Team Attorney, at (646) 428-3870 or [erin.greene@ed.gov](mailto:erin.greene@ed.gov); Jessica Daye, Compliance Team Investigator, at (646) 428-3812 or [jessica.daye@ed.gov](mailto:jessica.daye@ed.gov); or me, at (646) 428-3806 or [felice.bowen@ed.gov](mailto:felice.bowen@ed.gov).

Sincerely,

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

Félice A. Bowen  
Compliance Team Leader

Attachment

**Data Request**  
OCR Case No. 02-20-2063  
Columbia University (the University)

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

- SharePoint:** OCR may create an external sharing site through a browser-based portal in which the requested documents and information may be uploaded. Please contact Joy Purcell, Jessica Daye, and Erin Greene to receive online portal information to upload data.
- Email:** [joy.purcell@ed.gov](mailto:joy.purcell@ed.gov); [jessica.daye@ed.gov](mailto:jessica.daye@ed.gov); and [erin.greene@ed.gov](mailto:erin.greene@ed.gov)
- Fax:** (646) 428-3843
- Mail:** U.S. Department of Education  
Office for Civil Rights  
New York Office  
32 Old Slip, 25<sup>th</sup> Floor  
New York, New York 10005

Please do **not** provide the information via an electronic cloud format such as Google Docs.

Because email is not reliably secure, please do not email any document that contains personally identifiable or private information without first encrypting this information. You may upload this information using the SharePoint option described above.

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

**Response Due: December 10, 2023**

Please provide the following information for academic years 2018-2019, 2019-2020, 2020-2021, 2021-2022, 2022-2023, and 2023-2024, unless otherwise indicated, or indicate in writing if any of the requested items do not exist:

1. Copies of the University's policies and procedures, and/or a description of the University's practices, governing the investigation of complaints or incidents of which the University becomes aware pertaining to harassment of and other discrimination against students on the basis of national origin, including shared ancestry. Provide a detailed description of the complaint process, including each level of the process, the length of the process, and the types of records maintained. Also provide the name(s) and job title(s) of University staff responsible for handling complaints of discrimination, including harassment, on the basis of national origin, including shared ancestry, at each level of the process.
2. Explain how the University informs students and employees of the policies and procedures referred to in Item 1 above. Submit copies of all materials disseminated and websites that contain this information.
3. Copies of the University's policies and procedures, and/or a description of the University's practices, governing: (a) disciplinary or corrective actions that may be taken to address harassment of and other discrimination against students on the basis of national origin, including shared ancestry; and (b) the provision of supports and remedies to students, employees, and other individuals found to have been discriminated against/harassed on the basis of national origin, including shared ancestry.
4. Copies and/or descriptions of all formal and informal reports and complaints, including records of oral reports and complaints of alleged discrimination, including harassment, based on shared Jewish ancestry, antisemitism, and/or being Israeli received during academic years 2018-2019, 2019-2020, 2020-2021, 2021-2022, 2022-2023, and 2023-2024, including but not limited to any reports and complaints made by the Student. For each report/complaint/incident, please provide:
  - a. the name(s) and job title(s) of the person(s) to whom the report/complaint was made, and the date the report/complaint was made;
  - b. the name and relation to the University of the person making the report/complaint (e.g., student, faculty members, parent/guardian, counsel, member of the public);
  - c. a detailed description of the report/complaint, including the name(s) of the alleged target(s) of discrimination/harassment and the alleged discriminators/harassers if not evident from the copy of the report/complaint;
  - d. a detailed description of the grievance procedures or other complaint processing procedures employed to resolve the report/complaint;
  - e. the length of the investigation and complaint resolution process;
  - f. the name, national origin, ancestry, and/or ethnicity of each student involved in the alleged incident(s) of discrimination/harassment;

- g. the name(s) and relation to the University of any individual(s) who witnessed the alleged incident(s), including any University students, employees, or others;
  - h. the name(s) and relationship to the University of any witnesses interviewed by the University;
  - i. the name(s) and job title(s) of the individual(s) involved in the response to, investigation of, and resolution of the report/complaint;
  - j. all actions the University has taken in response to the report/complaint/concerns raised, including any corrective action taken, disciplinary sanctions imposed, supportive services and remedies offered and/or provided to individuals (e.g., counseling, safety measures), and/or University-wide remedies;
  - k. the final outcome of any investigation of the report/complaint, including copies of any incident/investigative reports, final determination, and any appeals;
  - l. if the University did not investigate any particular report/complaint, the reason(s) for not investigating, and the name(s) and job title(s) of the person(s) who made the decision;
  - m. any notice of the investigative findings provided to the complainant and/or other notice regarding the report/complaint, including notice of any outcomes on appeal; and
  - n. the complete case file for the report/complaint identified, including internal emails or other correspondence, internal and external memoranda, incident/investigative reports, video and audio recordings, witness statements, logs, forms, interview notes, notes regarding remedies provided, hearing transcripts, meeting minutes, and notes generated.
5. State whether the University conducts focus groups, other meetings, or trainings and/or holds informational sessions with students and/or staff regarding students' rights under Title VI, how to report possible violations of Title VI, and/or the University's obligation to respond to Title VI complaints. If so, provide the dates of such events, a description of the attendees, and any materials presented and/or distributed.
6. A detailed description of any training regarding discrimination, including harassment, based on national origin, including shared ancestry, that the University provided to University staff responsible for responding to such complaints. For each such training provide the dates of such training, a description of the training, a list of the names and job titles of the individuals who attended the training, and copies of any materials distributed during the training.
7. The name, job title, address, telephone number, fax number and email address of the University's contact person for this complaint.
8. Any other information the University believes will assist OCR in this investigation.