

February 12, 2024

VIA E-MAIL

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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.

██████████ 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, ██████████ 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,¹ for violations of Title VI and the statute’s implementing regulations.²

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.”³ Chapters at a number of schools, including Fordham, Rutgers, Brandeis, and George Washington Universities, have been banned or suspended.⁴

¹ 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/>.

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

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

⁴ 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.”⁵

CSJP expresses open hostility towards Jews on campus. For example, CSJP posted a story on Instagram showing a photograph of Dean of Students [REDACTED] [REDACTED] 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.⁶ Between the two photos is a caption reading “this is what [REDACTED] 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.⁷ 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.⁸ CSJP also expresses this sentiment in its constitution, describing Zionism as “a settler-colonial ideology.”⁹

[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). (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).

⁵ See https://www.instagram.com/p/CySIMrprJiT/?img_index=1.

⁶ See Exhibit 1.

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

⁸ See Exhibit 2.

⁹ 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),¹⁰ 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.¹¹

On October 14, 2022, Mr. Schechter told ██████████ 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 ██████████ 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 ██████████ 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 ██████████ was present but did not intervene.

¹⁰ 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').")

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

On October 30, 2023, Mr. Schechter reported to Dean [REDACTED] that he was not the only student barred from the CSJP teach-in. A number of other students who are Jewish or have Jewish-sounding names also RSVPed but did not receive the confirmation needed for admission: [REDACTED], [REDACTED], and [REDACTED] (who is not Jewish but whose name “sounds Jewish”).¹² Dean [REDACTED] responded by stating that SJP was permitted to deny affiliation to students on ideological grounds. He also asserted that because three Jewish students were permitted to affiliate with SJP, its exclusion of other Jewish students was not discriminatory.

The Dean failed to understand the situation. CSJP utilizes a litmus test whereby those believed to be Jewish, often on the basis of nothing other than a Jewish-sounding surname, are denied access to CSJP unless and until CSJP confirms that they do not support Israel. Non-Jewish students, however, are not subjected to this test. For example, [REDACTED] a non-Jewish student with a non-Jewish surname, was admitted to the event, no questions asked, despite SJP’s lack of knowledge of her positions on the Israeli-Palestinian conflict. When it comes to Jewish students, however, CSJP operates under the assumption that they must be Zionists, and until and unless they prove otherwise, they are not allowed into CSJP.

Indications of SJP’s discriminatory animus against Jews extend beyond the inferences to be drawn from the exclusion of Jewish students with Jewish surnames (and a non-Jewish student with a Jewish surname) and include anti-Semitic rhetoric and tropes as demonstrated by the attack on Dean [REDACTED].¹³

CSJP has demonstrated a general animus towards Jews and their real or perceived shared ancestral identity connected to Israel, and this animus has informed its discriminatory policies in refusing to grant Jewish students equal access to their club and programs, unless they are willing to disavow the Jews’ shared ancestral connection to Israel.

D. The University Failed to Ensure [REDACTED] Safety After She Received Death Threats from a CSJP Member.

[REDACTED] one of the students excluded from CSJP as described above, was also subjected to death threats by a CSJP member.

[REDACTED]

¹³ See Exhibit 1.

On November 12, 2023, the CSJP member sent a death threat to [REDACTED] after she responded to a social media post in which he called for “death to all Israelis who follow Zionism.” [REDACTED] asked the CSJP member if he wanted her dead. He responded “f*** yeah I want you and all Zionist trash bags dead the f*** kinda question is that?” The student then sent her a barrage of harassing messages accusing her of not being a real Jew and alleging that “Zionism is terrorism.”

[REDACTED] promptly reported this incident to Dean [REDACTED], President [REDACTED], and Chapman’s Department of Public Safety. President [REDACTED] replied to Ms. [REDACTED], indicating that he believed the CSJP member who made the threat had crossed the line and gone beyond protected speech. After the Department of Public Safety conducted a threat assessment and determined that the CSJP member was not a threat, however, the school permitted him to move back into on-campus housing pending an investigation independently initiated by Chapman’s Office of Student Conduct. At no point since issuing the death threat has the student been prohibited from campus. While Student Conduct spoke with [REDACTED] when she reported the death threat, there has been no follow up to date.

[REDACTED] continues to live in fear at Chapman due to the death threat issued on the basis of her Jewish identity by an individual who is routinely at the Chapman campus. While the University has offered [REDACTED] the options of exploring a no-contact order or having members of public safety escort her to and from class on an as-needed basis, these measures do not address the fact that a student who wished her dead, who also has regularly posted photographs of himself handling firearms, continues to freely roam the campus.

What is more, the same CSJP member continues to post content on social media glorifying terrorism against Jews. After Hamas’ October 7 massacre in Israel, he filmed himself on TikTok vandalizing an on-campus memorial to the Israeli victims of the massacre. He also falsely accused another Jewish student of stealing his Palestinian flag and threatened him, going so far as to demand the Jewish student’s address.

III. Legal Analysis

A. CSJP’s Exclusion of Jewish Students

For at least a year, CSJP has denied Jewish students access to club membership and its events solely on the basis of indicia of Jewish ethnicity, such as Jewish surnames, and imposes an unlawful ultimatum on Jewish students who wish to participate in club activities: Disavow an integral component of your Jewish identity— Zionism—or be denied the same rights and opportunities enjoyed by other members of the campus community.

Although Dean ██████ acknowledged to Mr. Schechter that CSJP may not exclude him because he is Jewish, the University has taken no action to prevent the group from excluding Jewish students.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in educational institutions that receive federal funding. Guidance issued by OCR and DOJ since 2004 has extended protections under Title VI to cover discrimination against Jews on the basis of their “actual or perceived shared ancestry or ethnic characteristics.”¹⁴ As clarified in Executive Order 13899 (“Executive Order”), Title VI must be enforced “against prohibited forms of discrimination rooted in anti-Semitism as vigorously as against all other forms of discrimination prohibited by Title VI.”¹⁵ Further, the Executive Order directs the Department of Education to refer to the International Holocaust Remembrance Alliance working definition of antisemitism (“IHRA Definition”) and its contemporary examples when investigating allegations of antisemitism under Title VI.¹⁶

¹⁴ See Russlynn Ali, “Dear Colleague Letter at 2–3, U.S. DEP’T EDUC.—OFFICE FOR C.R. (Oct. 26, 2010) (“2010 Dear Colleague Letter”), <https://www2.ed.gov/about/offices/list/ocr/letters/colleague-201010.pdf> (explaining a university must take “prompt and effective steps reasonably calculated to end the harassment, eliminate any hostile environment and its effects, and prevent the harassment from recurring”), see also Letter from Thomas E. Perez, Assistant Att’y Gen., U.S. Dep’t of Just.—C.R. Div., to Russlyn H. Ali, Assistant Sec’y for C.R., U.S. Dep’t of Educ.—Office for C.R., Re: Title VI and Coverage of Religiously Identifiable Groups (Sep. 8, 2010), https://www.justice.gov/sites/default/files/crt/legacy/2011/05/04/090810_AAG_Perez_Letter_to_Ed_OCR_Title%20VI_and_Religiously_Identifiable_Groups.pdf; Kenneth L. Marcus, Title VI and Title IX Religious Discrimination in Schools and Colleges: Dear Colleague Letter, U.S. DEP’T OF EDUC.—OFFICE FOR C. R. (Sep. 13, 2004), <https://www2.ed.gov/about/offices/list/ocr/religiousrights2004.html>.

¹⁵ Exec. Order No. 13899 §1, 3 C.F.R. 68779-68780 (2019); see also Questions and Answers on Executive Order 13899 (Combatting Anti-Semitism and OCR’s Enforcement of Title VI of the Civil Rights Act of 1964, U.S. DEP’T EDUC.—OFFICE FOR C.R. (Jan. 19, 2021), <https://www2.ed.gov/about/offices/list/ocr/docs/qa-titleix-anti-semitism-20210119.pdf>.

¹⁶ *Id.* For the contemporary examples, see INT’L HOLOCAUST REMEMBRANCE ALLIANCE, *Working Definition of Antisemitism*, <https://holocaustremembrance.com/resources/working-definition-antisemitism> (last visited Jan. 24, 2024).

The Executive Order is relevant here, where the unlawful discrimination is motivated by anti-Semitic bias and targets Chapman students on the basis of their actual or perceived Jewish shared ancestry and ethnic identity. The IHRA Definition and the contemporary examples it cites provide helpful guidance for understanding why the anti-Semitic discrimination at Chapman is motivated by CSJP's perception of the students' Jewish identity. The IHRA Definition states that "the denial to Jews of opportunities or services available to others" is "antisemitic discrimination."¹⁷ Further, under the IHRA Definition, denying the Jewish people's right to self-determination (and by extension, denying Jewish students' right to support the Jewish homeland) is an indicator of anti-Semitism.¹⁸

CSJP's discrimination against Jews is particularly insidious because it discriminates against Jews —on the basis of the fact they are Jews — but then attempts to cloak its discrimination by saying it opposes Zionism, not Judaism. Chapman's administration has erroneously accepted this ploy. While criticism of the State of Israel or opposition to the policies of the Israeli government does not constitute anti-Semitism, anti-Zionism crosses the line into anti-Semitism when it discriminates against Jews who recognize the Jews' historic connection to the land of Israel and the right of the Jewish people to self-determination in their ancestral homeland as key components of their Jewish identity.

The United States, along with at least forty-two other nations, has recognized that demonizing, delegitimizing and applying a double standard to Israel—all forms of anti-Zionism that are distinct from criticism of the State of Israel or opposition to the policies of the Israeli government—are indicative of anti-Semitism.¹⁹

By erasing or denying the Jewish people's ancestral connection to one another and to the land of Israel and by rejecting the very right of the State of Israel to exist, anti-Zionism denies to the Jewish people a fundamental human right to self-determination.²⁰

For many Jewish students at Chapman, including Mr. Schechter and [REDACTED], Zionism is an integral component of Jewish ethnic and ancestral identity. For many Jews, including many Jewish students at Chapman, identifying with and expressing support for the Jewish homeland is also a sincere and deeply felt expression of their Jewish ethnic and ancestral identity.

¹⁷ *Id.*

¹⁸ *Id.*

¹⁹ What is antisemitism?, INT'L HOLOCAUST REMEMBRANCE ALL., <https://holocaustremembrance.com/resources/working-definition-antisemitism>.

²⁰ See, e.g., U.N. Charter art. 1, ¶2.

When Jewish students at Chapman University are shunned and marginalized for demonstrating pride in their Jewish ancestral heritage, they are being unlawfully targeted on the basis of their “actual or perceived shared ancestry or ethnic characteristics” in violation of Title VI.

Under Title VI, a university must respond to discrimination when it “negatively affect[s] the ability and willingness of Jewish students to participate fully in the school’s education programs and activities.”²¹ In this case, Chapman has not taken steps to ameliorate the discrimination against Jews and has, in fact, endorsed it by approving SJP’s practice of banning Jewish students, justifying this unlawful practice as ideological rather than ethnic discrimination. SJP, with the full support of Chapman, has prevented Jewish students from fully participating in student organizations and clubs.

Chapman is legally obligated to protect these students from the anti-Semitic marginalization and exclusion they are being subjected to on the basis of their Jewish identity. This discrimination has denied the students an equal opportunity to enjoy the benefits of Chapman’s educational and extracurricular offerings.

B. The Death Threat Against ██████████

Peer harassment that targets Jewish students on the basis of their actual or perceived shared ancestry is prohibited under Title VI.²² This Office has noted that:

Harassing conduct may take many forms, including verbal acts and name-calling; graphic and written statements, which may include use of cell phones or the Internet; or other conduct that may be physically threatening, harmful, or humiliating. Harassment does not have to include intent to harm, be directed at a specific target, or involve repeated incidents.²³

Here, the harassment took the form of cyberbullying and was threatening and humiliating. It dehumanized ██████████ on the basis of her Jewish identity, even questioning her right to live. The student’s harassment of Jews on campus has also taken a generalized form through his vandalization of the October 7 memorial. This Office has further recognized that:

Bullying fosters a climate of fear and disrespect that can seriously impair the physical and psychological health of its victims and create

²¹ Ali, *Dear Colleague*, supra note 14, at 5-6.

²² Ali, *Dear Colleague*, supra note 14, at 1.

²³ *Id.* at 1.

conditions that negatively affect learning, thereby undermining the ability of students to achieve their full potential.²⁴

██████████'s experience fits this Office's concerns about bullying like a glove. Every day she goes to school in fear that the student, who is permitted on campus, will act on his death threat. She has experienced great anxiety and feels that her ability to learn has been diminished as a result.

The student's death threat against ██████████ goes beyond the bullying and harassing conduct for which this Office has indicated is unlawful. For example, this Office has identified as creating a hostile education environment anti-Semitic graffiti, bullying based on stereotypes about Jews and money, and making derogatory references to Jewish students.²⁵ By allowing ██████████'s harasser to continue coming to campus and even move into student housing, Chapman has abdicated its duty to take appropriate remedial action. This Office has advised that prompt and comprehensive approaches are required to address Title VI violations.²⁶

Removing a harasser from campus—at least while he remains under investigation—would seem like an appropriate first step in ending the unlawful harassment of Jewish students at Chapman.

IV. Suggested Remedies

In light of Chapman's failure to (1) address the anti-Semitic discrimination and harassment against Jewish students on the basis of their shared ancestry and ethnic identity, (2) take steps to eliminate the atmosphere of exclusion and harassment and its effects for Jewish students at Chapman, and (3) ensure equal access to all Chapman organizations, clubs and activities for all Jewish students, OCR should require Chapman to take the following steps to come into compliance with Title VI.

A. Chapman Should Ensure a Swift and Comprehensive Investigation into the Death Threat Against ██████████ Including Adequate Disciplinary Measures upon Finding a Policy Violation.

Chapman should prioritize its investigation into the CSJP member responsible for issuing the death threat against ██████████ ensuring that her allegation is treated with the swiftness and seriousness that it deserves. Chapman

²⁴ *Id.* at 1.

²⁵ *Id.* at 5.

²⁶ *Id.* at 1, 8-9.

should take all appropriate measures, including disciplinary action, that are recommended as a result of the investigation and in accordance with university policies. Chapman should ensure that any disciplinary measures are on par with those enacted when threats of violence have been issued to other members of the Chapman student community on the basis of a protected characteristic.

B. Chapman Should Revise its Anti-discrimination Policies to Better Address the Rights of Jewish Students and Provide Training to Faculty, Staff, and Students on the Revised Guidelines.

Chapman's Harassment and Discrimination policy recognizes that students are protected on the basis of their ethnicity and ancestry and that it is unlawful to exclude students from "social activities on the basis of a protected characteristic," but there is no specific indication that this applies to Jewish students.²⁷ Chapman should revise this policy to ensure compliance with federal law including Title VI of the Civil Rights Act, Executive Order 13899, and the IHRA working definition of antisemitism, including its guiding examples. The revised policies should expressly prohibit discrimination against Jewish students, whether on the basis of religious or ethnic identity, including ancestral origin. Chapman should then implement a training program to ensure that everyone on campus understands and can recognize harassment and discrimination on the basis of shared ancestry and ethnic identity, including anti-Zionist forms of anti-Semitism.

C. Chapman Should Ensure that Student Clubs, and CSJP in Particular, are Equally Accessible to all Jewish Students Regardless of Their Real or Perceived Shared Ancestral or Ethnic Identity Connected to Israel.

Chapman's Student Organization Policies and Procedures contain a broad statement on diversity and inclusion and a reference to its Harassment and Discrimination policy,²⁸ but there is no guidance in either policy document that would directly address the type of exclusion Mr. Schechter, ██████████ and their Jewish peers experienced.

In addition to updating its anti-discrimination policies as described above, Chapman should update its student organization policies and procedures to ensure

²⁷ Harassment, Discrimination, and Sexual Harassment Policy, pp. 2-3, <https://www.chapman.edu/faculty-staff/human-resources/files/harassment-discrimination-and-sexual-harassment-policy.pdf>.

²⁸ See <https://www.chapman.edu/students/life/files/clubs-organizations/documents/student-org-policies-fall19.pdf>, pp. 4-5.

that no Chapman students, including Jewish students, are denied access to any student organizations, or excluded from full access to the benefits of any such organization, on the basis of national origin, including shared ancestral and ethnic identity.

In enacting these suggested changes, Chapman's policies should clearly note, in accordance with OCR's guidance, that discrimination on the basis of Jewish shared ancestry and ethnicity connected to Israel will not be tolerated in determining club membership or access to club events as it constitutes unlawful discrimination on the basis of Jewish identity rather than ideology. Chapman should provide notice to all students and staff to this update in its policies. At present, Chapman's anti-discrimination policy is entirely silent on anti-Semitism in any form, let alone anti-Semitism disguised as anti-Zionism.²⁹

D. Chapman Should Investigate Discriminatory Practices by Student Groups, Ensure That All Barriers to Nondiscriminatory Access are Eliminated, and Discipline Those Groups that Engage in Discrimination.

Chapman should investigate the practices of CSJP, and upon a finding of unlawful discrimination, it should withdraw the organization's recognition as an official Chapman club, eligible for funding from the school. At the very least, Chapman should suspend the organization until Chapman can verify that all students are provided equal access to CSJP's services, benefits, and resources, regardless of their shared ancestral and ethnic identity. To ensure that unlawful discriminatory practices are halted, CSJP must announce, to university officials and the public, that they will no longer discriminate on the basis of a student's ancestral origin, reflected in his or her affinity to a national homeland, or any other basis deemed unlawfully discriminatory in light of the Executive Order and the IHRA Definition. Within six months, Chapman should provide OCR with a report on actions taken to address its findings and CSJP's compliance with these remedial measures.

E. Chapman Should Issue a Statement Denouncing Anti-Semitism in All Its Forms and Recognizing that Zionism is a Key Component of Jewish Identity for Many of Its Students.

The University should issue a public statement condemning anti-Semitic threats and discrimination that target members of Chapman's Jewish community on the basis of their shared ancestral and ethnic identity. In particular, the

²⁹ See Harassment, Discrimination, and Sexual Harassment Policy *supra* note 27.

University should make clear that CSJP's behavior excluding, ostracizing, or otherwise treating Zionist students (and students it perceives to be Zionists) in a discriminatory fashion is unacceptable conduct. Further, the University should state that it is never acceptable to threaten the physical safety of someone on the basis of their Jewish shared ancestral and ethnic identity connected to Israel.

The University statement should recognize that for many Jewish students at Chapman, including Mr. Schechter and ██████████ Zionism is a key component of their religious, shared ancestral and ethnic identity, and that excluding or harassing anyone on the basis of such identity is unacceptable. Further, the University should publicly announce that it will apply the IHRA Definition and its contemporary examples in determining whether discrimination is motivated by anti-Semitic animus. This requires a clear repudiation of Dean ██████'s misguided belief that discrimination on the basis of an individual student's identity can be dismissed as mere viewpoint discrimination. We strongly urge the University to use or model its statement on the following language:

We condemn anti-Semitism in all its forms. We recognize that Zionism is a key component of the religious and ethnic identity of many Jewish students on our campus. Efforts to demonize Zionism and make these Chapman students feel unsafe or unwelcome expressing this part of their religious, ancestral and ethnic identity is contrary to our university's basic values of mutual respect and inclusion. Our university must be a place for the free and open exchange of ideas. It is never acceptable to harass, intimidate, marginalize, exclude, or demonize any part of our university community on the basis of its identity.

The University is committed to taking all necessary actions, including discipline where appropriate, to address and ameliorate discrimination based on shared ancestry or ethnicity, including anti-Semitism that manifests as anti-Zionism.

F. The University Should Conduct Mandatory Training for the University Community Regarding its Revised Anti-Discrimination Policy that Includes a Specific Focus on the Different Manifestations of Anti-Semitism, Including Anti-Zionism and National Origin-Based Discrimination.

The University should conduct training for the University community, including students, faculty, staff, administrators, and campus security, concerning the revised anti-discrimination policy and its implementation. Such training should include programming and educational materials about national origin

discrimination and harassment, which specifically address the many manifestations of anti-Semitism and incorporate the IHRA Working Definition and its contemporary examples as well as the real-world example that transpired at Chapman where Jews were threatened and excluded from participating in CSJP membership and events based on their Jewish shared ancestral and ethnic identity.

V. Request for Section 201(a) Mediation

The Complainants request mediation at the time of filing pursuant to Section 201(a) of OCR's Case Processing Manual.

VI. Conclusion

For the foregoing reasons, the Brandeis Center requests an investigation into Chapman's compliance with Title VI.

Respectfully Submitted,



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M. Louis Mainen, Esq.,
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EXHIBIT 1

CSJP Post About Dean 

9:30



sjpchapman



this is what

supports



Send message



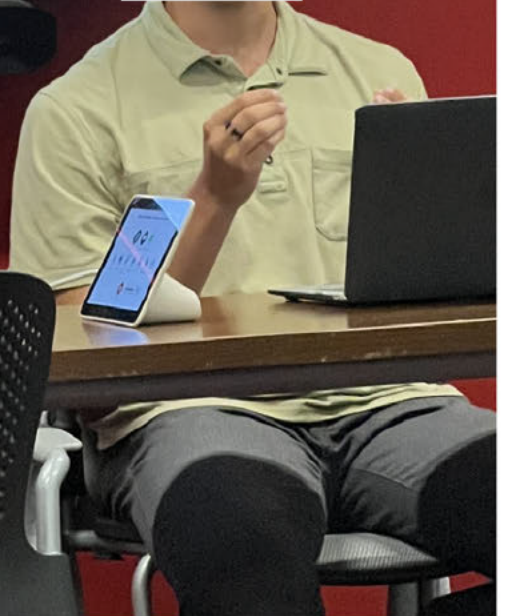
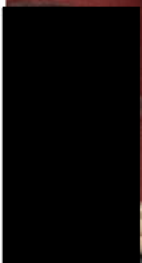
EXHIBIT 2

CSJP Event

المرونة

Zionism:
The Inhibitor to Climate Justice

- Zionism necessitates constant expansion and theft of Palestinian land which destroys Palestinian ecosystems.
- The constant and illegal dispossession of Palestinian land in the name of a Jewish ethnostate inhibits Palestinian climate resilience and self-determination.



Re

10:58

LTE



Meme

What is Zionism?

A settler colonial movement whose goal was the establishment of a Jewish state through ethnic cleansing of the Palestinian people. It is a political ideology developed in the late 1800s.

Zionism as the ideology that justifies the existence of the state of Israel at the direct expense of the Palestinian people, as well as belief in the necessity for this state to be maintained in direct opposition to Palestinian sovereignty, freedom and independence.

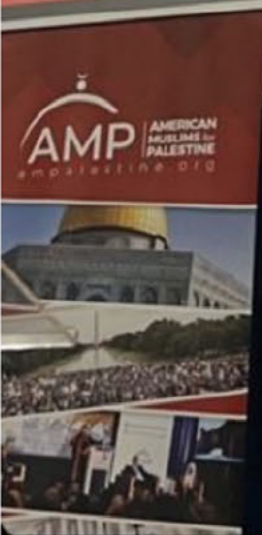
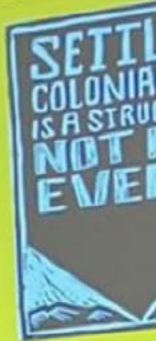
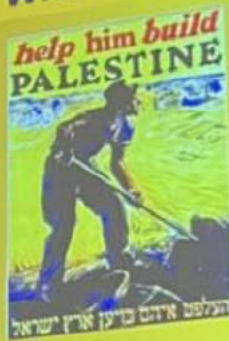


EXHIBIT 3

██████████ Death Threat

12:55



[Redacted] 51m



JERUSALEM (Reuters) - Israel's military has nominated a new chief rabbi who seemed to imply in a past religious commentary that its soldiers are allowed to rape non-Jewish women in wartime.



[Redacted]
***May allah bring death
to all Israelis who
follow Zionism***

Send message



11:16

5G



Inquire

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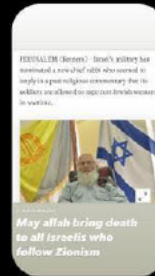


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YESTERDAY 1:37 PM

You replied to their story



So you want me dead?

11:15 AM

Bitch you support rape of innocent non-jewish women? Fuck yeah I want you and all you Zionist trash bags dead the fuck kinda question is that 😂

Absolutely wild you would defend that u have no shame as a human you disgusting creature



Message...



4:25

5Gw



Inquire

View profile

3:51 PM

I don't support the rape or murder of anyone. Seems like you are okay with it when Hamas did it to the Jews though.

Also Zionist definition: a supporter of Zionism; a person who believes in the development and protection of a Jewish nation in what is now Israel.

Do you not support there being a Jewish state?

Let me ask you a simple question, does the Torah support there being a Jewish state?

Replied to you

I don't support the rape or murder of anyone. Seems like you are okay with it when Hamas did it to the Jews... more

Please show me actual evidence of Hamas because all you little low life's have yet to show any proof but I can show you many things about your scum Zionists

<https://www.instagram.com/reel/CzhE4OnlrZY?igshid=YjVjNjZkNmFjNg==>



Message...



10:47



cravingpalestine
Instagram

Like that is ur people right there, should I continue to send you more evidence? I'll tell u what we can take turns how about you show me Hamas raping because i'm pretty sure you saw that grandma say how well she was treated

Also stop being a little girl trying to set me up and run over to Mr. Price

Zionism is terrorism, you are the Terrorist polluting this world with your fucking lies. Go to hell

Replied to themselves

Let me ask you a simple question, does the Torah support there being a Jewish state?

Why didn't you answer this huh, because you aren't even a real Jew. What does your Torah say. State it



Message...

