



CAIR Legal Defense Fund

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The Chambers of the Honorable Judge Submaranian
United States District Judge
Southern District of New York
500 Pearl Street, New York, NY 10007

via ECF

Re: *Khalil, et. al. v. Trustees of Columbia University, et. al.*, 25-cv-02079.

Hon. Judge Subramanian:

Plaintiffs submit this letter requesting that the Court enforce its Dkt. 54 Order and require Columbia Defendants to provide thirty days' notice in advance of a disclosure of information campus officials intend to make to Congress today—this time a Senate Committee requesting extensive records and information about students and their associations.

In a letter filed yesterday evening, Columbia Defendants informed Plaintiffs' counsel and the Court that they intend to provide further information and records to a Senate Committee's March 26th request. Exhibit A – March 26 Letter . The University Defendants intend to do so today, the deadline set out by the letter. Id. Plaintiffs believe, however, that the University Defendants' planned production is subject to the Court's thirty-day notice requirement. Dkt. 54 (requiring that campus officials "must advise the plaintiffs and Court of their intended production" and must do so "at least thirty days before furnishing to Congress any student records").

The letter demands "student records" repeatedly—information and records about specific events organized by students, about a specific student group that Plaintiffs have been associated with and with which they share a viewpoint, about student connections with community groups. These are student records that the Senate Committee is seeking.

Columbia Defendants submit that their response to the letter "will not include any student records, nor furnish any students' identities in records already produced" and thus does "not fall within the Court's Order." But Plaintiffs are concerned that the University Defendants are using an implausibly narrow definition of "student records" to skirt this Court's order. Because of this, Plaintiffs respectfully request that the Court require the University Defendants to "advise the plaintiffs and Court of their intended production" in line with this Court's April 4th order. See Dkt. 54. That is especially appropriate here for two reasons.

First, the Senate Committee has only sent a letter. The University Defendants are under no legal compulsion to immediately respond, and a short delay that gives the parties the opportunity to litigate the lawfulness of Columbia University's behavior will not create prejudice. Second, allowing the University Defendants to make a secret production to the Senate Committee now, without any notice to the Court or to opposing counsel, will establish an easy workaround to the Court's April 4th Order.



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The Court established this notice requirement “to give plaintiffs the opportunity to seek timely relief if necessary.” Dkt. 54. Plaintiffs intend to argue that the University Defendants’ response to the Senate Committee’s request is unlawful and need time to be able to present that argument to the Court.

Accordingly, Plaintiffs respectfully request that the Court enforce its April 4th order against Defendants and direct the University Defendants to provide notice to Plaintiffs and the Court of what campus officials intend to disclose. The University Defendants should at least share the correspondence, table of contents, or other accounts of the disclosure with the Court and Plaintiffs to the extent permitted and appropriate or, if this court so requires, hears us on the issue.

April 9, 2025

Respectfully submitted,

/s/ Gadeir Abbas

Gadeir Abbas

Deputy National Litigation Director

CAIR Legal Defense Fund

/s/ Amy Greer

Amy E. Greer (NY 5910179)

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/s/ Lamya Agarwala

Lamya Agarwala

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New York

/s/ Jonathan Wallace

Jonathan Wallace

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Exhibit A

BILL CASSIDY, OF LOUISIANA, CHAIRMAN

RAND PAUL, OF KENTUCKY	BERNARD SANDERS, OF VERMONT
SUSAN M. COLLINS, OF MAINE	PATTY MURRAY, OF WASHINGTON
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ASHLEY MOODY, OF FLORIDA	ANGELA D. ALSOBROOKS, OF MARYLAND

AMANDA LINCOLN, MAJORITY STAFF DIRECTOR
WARREN GUNNELS, MINORITY STAFF DIRECTOR

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United States Senate

COMMITTEE ON HEALTH, EDUCATION,
LABOR, AND PENSIONS

WASHINGTON, DC 20510-6300

March 26, 2025

VIA ELECTRONIC TRANSMISSION

Dr. Katrina Armstrong
Interim President
Columbia University
535 W. 116th St., MC 4309
New York, NY 10027

Dear Interim President Armstrong:

In February, dozens of Columbia students “took over a building at [Columbia-affiliated] Barnard College for several hours,” resulting in an assault on a school employee.¹ According to reports, the students were protesting the expulsion of students who “stormed a Columbia University class in January and threw around flyers loaded with hateful [anti-Israel] rhetoric.” Columbia’s chapter of Students for Justice in Palestine (SJP) posted on X about the incident, stating, in part, “WE WILL NOT STOP UNTIL OUR DEMANDS ARE MET.”²

These events are part of a broader pattern involving SJP that have posed threats to campus safety. On November 10, 2023, Columbia suspended SJP after the group “repeatedly violated University policies related to holding campus events.”³ According to a November 10, 2023, statement, one of those events included “threatening rhetoric and intimidation.”⁴ Since then, Columbia has been the site of demonstrations that have led to more than 200 arrests and detentions and prompted university officials to issue “expulsions, temporary degree revocations, and multi-year suspensions.”⁵

¹ Chris Nesi, Shane Galvin, and Valentina Jaramillo, *Pro-Hamas protesters seize control of historic Barnard academic building and assault college employee*, NEW YORK POST (Feb. 26, 2025), <https://nypost.com/2025/02/26/us-news/dozens-of-pro-hamas-students-seize-control-of-historic-barnard-college-academic-building/>.

² X Post, SJP at Columbia (Feb. 26, 2025), <https://x.com/ColumbiaSJP/status/1894857746056663155>.

³ Sarah Huddleston and Chris Mendell, *Columbia suspends SJP and JVP following ‘unauthorized’ Thursday walkout*, COLUMBIA SPECTATOR (Nov. 11, 2023), <https://www.columbiaspectator.com/news/2023/11/10/columbia-suspends-sjp-and-jvp-following-unauthorized-thursday-walkout/>

⁴ *Statement From Gerald Rosberg, Chair of the Special Committee on Campus Safety*, COLUMBIA NEWS (Nov. 10, 2023), <https://news.columbia.edu/news/statement-gerald-rosberg-chair-special-committee-campus-safety>.

⁵ *Where Protesters on U.S. Campuses Have Been Arrested or Detained*, THE NEW YORK TIMES (July 22, 2024), <https://www.nytimes.com/interactive/2024/us/pro-palestinian-college-protests-encampments.html>; Spencer Davis and Daksha Pillai, *UJB issues expulsions, degree revocations, and suspensions for Hamilton Hall occupation*, COLUMBIA SPECTATOR (Mar. 14, 2025), <https://www.columbiaspectator.com/news/2025/03/13/ujb-issues-expulsions-degree-revocations-and-suspensions-for-hamilton-hall-occupation/>.

According to reports, SJP was supported by another group, American Muslims for Palestine (AMP), which has personnel with reported ties to the Foreign Terrorist Organization Hamas.⁶ AMP leaders have engaged with college students during anti-Israel campus demonstrations, and AMP Executive Director Osama Abuirshaid has directly addressed students at Columbia University. Dr. Abuirshaid previously worked as editor of a newspaper for an organization that was founded with startup money from Hamas leader Mousa Abu Marzook.⁷ In addition, he “has . . . published interviews that highlight his communications with Hamas leader Abu Marzook and other Hamas leaders in Gaza . . . [and] in 2014 . . . was featured on the website of Hamas’s self-declared military wing, the al-Qassam Brigades.”⁸

Activity that threatens the safety of others is not constitutionally protected free speech, and conduct that violates campus rules should not be tolerated. Reports of individuals with ties to terrorist groups or their affiliates engaging with students on college campuses are also cause for the highest alarm.

Through its Task Force to Combat Anti-Semitism, the Trump Administration is taking critical steps to address “anti-Semitic harassment in schools and on college campuses.”⁹ In addition, the U.S. Department of Education has announced that sixty colleges and universities, including Columbia, “are presently under investigation for Title VI violations relating to antisemitic harassment and discrimination.”¹⁰ I understand that Columbia has been working with the Trump Administration to address its concerns. The U.S. Senate Committee on Health, Education, Labor and Pensions (HELP) is also investigating the activities of Hamas-linked groups on college campuses to determine what, if any, additional legislative action may be required to protect students.

In order for HELP to investigate these matters further to ensure campus safety, please respond to the following, on a question-by-question basis, no later than April 9, 2025.

1. Please provide a detailed account of incidents on Columbia’s campus involving SJP, including any that contributed to Columbia’s decision to suspend the group. Your

⁶ *The sources of the pro-Palestinian demonstrations*, FOX NEWS (May 11, 2024), <https://www.foxnews.com/video/6352755454112>; *Who’s really behind Students for Justice in Palestine*, FOX NEWS (Apr. 23, 2024), <https://www.foxnews.com/video/6351492889112>; *From Ivory Towers to Dark Corners: Investigating the Nexus Between Antisemitism, Tax-Exempt Universities, and Terror Financing*, Hearing before the House Ways and Means Committee, 118th Congress (2023) (statement of Dr. Jonathan Schanzer), <https://gop-waysandmeans.house.gov/wp-content/uploads/2023/11/Schanzer-Testimony.pdf>.

⁷ *From Ivory Towers to Dark Corners: Investigating the Nexus Between Antisemitism, Tax-Exempt Universities, and Terror Financing*, Hearing before the House Ways and Means Committee, 118th Congress (2023) (statement of Dr. Jonathan Schanzer), <https://gop-waysandmeans.house.gov/wp-content/uploads/2023/11/Schanzer-Testimony.pdf> at 9.

⁸ *Id.*

⁹ Press Release, Justice Department Announces Formation of Task Force to Combat Anti-Semitism (Feb. 3, 2025), <https://www.justice.gov/opa/pr/justice-department-announces-formation-task-force-combat-anti-semitism>

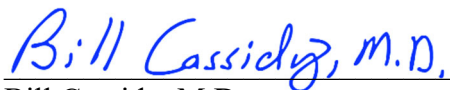
¹⁰ Press Release, “U.S. Department of Education’s Office for Civil Rights Sends Letters to 60 Universities Under Investigation for Antisemitic Discrimination and Harassment” (March 10, 2025), <https://www.ed.gov/about/news/press-release/us-department-of-educations-office-civil-rights-sends-letters-60-universities-under-investigation-antisemitic-discrimination-and-harassment>.

response should include all violations of campus policy, threats to campus safety, and antisemitic threats directed at Columbia students.

2. Please summarize the steps Columbia has taken to investigate the February 2025 incident at Barnard College and all related findings.
3. Please provide all records in the university's possession related to SJP and its on-campus activities.
4. Did SJP cease any of its activities on campus after being suspended, and did its suspension reduce the severity of campus protests? Please explain.
5. Is the university aware of any organizing activity by AMP or its affiliates on Columbia's campus? Please provide all related records.
6. Is the university aware of the connection between SJP, AMP, and the Foreign Terrorist Organization Hamas? Please explain and provide all related records.
7. Did SJP ever receive funding from the University? If so, how much, and what was the source of the funding?
8. Did campus policy require that SJP have a faculty representative? If so, was a faculty member assigned to this role or did one volunteer to serve as SJP's representative? Please provide all relevant information.

Thank you for your attention to this important matter.

Sincerely,



Bill Cassidy, M.D.

Chairman

U.S. Senate Committee on Health,
Education, Labor, and Pensions