

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

**StandWithUs Center for Legal Justice,
Katerina Boukin, and Marilyn Meyers,**

Plaintiffs,

v.

Massachusetts Institute of Technology,

Defendant.

Case No.

**COMPLAINT AND DEMAND FOR
JURY TRIAL**

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PRELIMINARY STATEMENT

1. Antisemitism on college campuses, and specifically at the Massachusetts Institute of Technology (“MIT”), has been on the rise in recent years—even before October 7, 2023, when Hamas terrorists invaded Israel and carried out the deadliest attack against Jews since the Holocaust.

2. President Biden described the magnitude of the attacks against Israel in a speech on October 10, 2023:

You know, there are moments in this life — and I mean this literally — when the pure, unadulterated evil is unleashed on this world.

The people of Israel lived through one such moment this weekend. The bloody hands of the terrorist organization Hamas — a group whose stated purpose for being is to kill Jews.

This was an act of sheer evil.

More than 1,000 civilians slaughtered — not just killed, slaughtered — in Israel. Among them, at least 14 American citizens killed.

Parents butchered using their bodies to try to protect their children.

Stomach-turning reports of being — babies being killed.

Entire families slain.

Young people massacred while attending a musical festival to celebrate peace — to celebrate peace.

Women raped, assaulted, paraded as trophies.

Families hid their fear for hours and hours, desperately trying to keep their children quiet to avoid drawing attention.

And thousands of wounded, alive but carrying with them the bullet holes and the shrapnel wounds and the memory of what they endured.

You all know these traumas never go away.

There are still so many families desperately waiting to hear the fate of their loved

ones, not knowing if they're alive or dead or hostages.

Infants in their mothers' arms, grandparents in wheelchairs, Holocaust survivors abducted and held hostage — hostages whom Hamas has now threatened to execute in violation of every code of human morality.

It's abhorrent.

The brutality of Hamas — this bloodthirstiness — brings to mind the worst — the worst rampages of ISIS.

This is terrorism.¹

3. In the wake of the atrocities of October 7, 2023, the world changed, and so, too, did the experience of students, including and especially Jewish students, at MIT.

4. October 7, 2023, should have been a day of mourning and solidarity. Instead, students, including and especially Jewish students, were immediately bombarded by social media posts across MIT-affiliated platforms, applauding the so-called “resistance” against Israel (a gross attempt to cast the murder, rape and kidnapping of Israelis in the language of social justice, rather than the terrorism that it was). Similarly, on MIT's campus, students, including and especially Jewish students, were soon subjected to in-person demonstrations with participants who engaged in speech and conduct that targeted Jewish students and the very right of existence of the State of Israel, and in so doing violated both MIT's anti-discrimination and anti-harassment policies, including as reflected in MIT's codes of conduct, and went beyond the protections of free speech.

5. Despite the official and unwavering recognition by President Biden of the terroristic and intolerable acts of violence committed by Hamas on October 7, MIT refused to enforce its anti-discrimination policies when an antizionist and antisemitic response emanated from MIT-recognized student groups, choosing instead to cloak those groups' response in the guise of “free

¹<https://www.whitehouse.gov/briefing-room/speeches-remarks/2023/10/10/remarks-by-president-biden-on-the-terrorist-attacks-in-israel-2/>

speech.” MIT tolerated discriminatory, harassing speech that it had expressly not tolerated in other comparable situations.

6. MIT’s glaringly inadequate response took place even though the school’s policies make it clear that MIT will not tolerate impermissible speech and conduct (i.e. speech and conduct that violates MIT’s anti-discrimination and anti-harassment policies, including as reflected in MIT’s codes of conduct) and that MIT will act to prevent such speech and conduct.

7. In enabling this discriminatory conduct, MIT has directly and intentionally contributed to a pervasively hostile campus environment in violation of Title VI of the Civil Rights Act of 1964 and breached its duties to Plaintiffs, to its other Jewish students, to its Israeli students, and, indeed, to the entire MIT campus community.

8. Any alleged “action” taken by MIT in response to discriminatory and harassing speech and conduct was not designed to have any meaningful impact in stopping the spreading wildfire of antisemitism, including antisemitic conduct.

9. As a result of MIT’s blatant and intentional disregard for its legal obligations to its students, Plaintiffs and other students have suffered injury, including in their educational experience. Jewish and Israeli students at MIT have felt unsafe attending classes, have deferred graduation dates or exams, and even some Jewish and Israeli professors have left the university.² Jewish and Israeli students have also avoided going to certain locations on campus during protests because of the hostile environment created by those protests.

10. Refusing to watch idly as their safety and educational experience were threatened, Plaintiffs took significant actions to seek—and even beg—for administrative support from MIT.

² The loss of Jewish professors, itself, contributes to and perpetuates the hostile educational environment to which Plaintiffs and SCLJ members are subjected.

Worse than simply ignoring Plaintiffs and other complaining students, MIT instead made empty promises followed by inaction.

11. MIT must now, finally, be compelled through an order of this Court to implement comprehensive, meaningful remedial measures including but not limited to: (i) terminating administrators, professors, or other university employees or staff responsible for the antisemitic abuse permeating the school, whether because they engaged in it or permitted it; (ii) suspending or expelling students and/or student groups who engage in such conduct; (iii) communicating to the entire MIT community by broadcast email or a similar medium, that MIT will condemn, investigate, and punish any conduct that discriminates against or harasses members of the Jewish community, or others on the basis of their ethnic or ancestral background; (iv) providing education about antisemitism, including by conducting mandatory training for administrators and professors; (v) instituting strict review and approval policies to ensure that the administration does not conduct, or finance, programs that will result in the harassment of or discrimination against Jewish students of the MIT community, including those for whom Zionism is an integral part of their identity; and (vi) paying damages to Plaintiffs who have not only lost the value of their educational experience, but who continue to suffer harm through lost opportunities, all as a result of MIT's intentional refusal to act to ensure the safety of its Jewish students. MIT's selective enforcement of its anti-discrimination and anti-harassment policies in the face of antisemitic and antizionist speech and conduct, as well as other instances of MIT allowing misconduct aimed at Jewish and Israeli members of the MIT community, evinces further discriminatory intent towards such Jews and Israelis, as well as discriminatory impact upon them. Plaintiffs seek damages, injunctive relief, and additional remedies as set forth herein. An institution of higher learning such as MIT need not take a public or political stance on the war between Israel and Gaza to comply with its clearly

delineated (and federally required) policies requiring that MIT refuse to tolerate rampant antisemitism on its campus and through its media platforms. MIT's blatant civil rights violations, however, have resulted in a hostile educational environment where Plaintiffs and other students who are or are perceived to be Jewish or Israeli, have suffered horrendous acts of hate, discrimination and harassment—all with the sanction of MIT's administration.

12. MIT violated Title VI of the Civil Rights Act of 1964 and sanctioned such acts by refusing to enforce its own anti-discrimination and conduct policies—which it has historically not hesitated to enforce to protect other targets of discrimination. MIT's actions (and inactions) with regard to hateful antisemitic discrimination and harassment targeting its Jewish and Israeli students, demonstrate, at best, a deliberate indifference to protect MIT students from hateful antisemitic discrimination and harassment.

13. This action seeks redress for MIT's failure to meet its legal obligations, in particular by intentionally and effectively discriminating against Jewish and Israeli students (and employees).

15. Because of such selective enforcement and other instances of MIT allowing such discriminatory and harassing conduct, Plaintiffs are also entitled to injunctive relief and attorneys' fees.

PARTIES

14. Plaintiff StandWithUs Center for Legal Justice ("SCLJ") is a tax-exempt membership organization organized under the laws of California that partners with StandWithUs, a nonprofit education organization dedicated to combating antisemitism. Composed of students, professors, and community members; SCLJ enhances StandWithUs's mission through impact

litigation and other legal actions. SCLJ's members include current Jewish and/or Israeli MIT undergraduate and graduate students and alumni.

15. Plaintiff Marilyn Meyer is a Jewish undergraduate student currently enrolled at MIT. Plaintiff Meyer currently resides in the City of Boston in the State of Massachusetts. She is also a member of SCLJ.

16. Plaintiff Katerina Boukin is a Jewish Israeli graduate student currently enrolled at MIT. Plaintiff Boukin currently resides in the City of Somerville in the State of Massachusetts. She is also a member of SCLJ.

17. SCLJ Member # 1 is a Jewish undergraduate student currently enrolled at MIT. SCLJ 1 resides in the City of Boston in the State of Massachusetts.

18. Defendant Massachusetts Institute of Technology (MIT) is a private not-for-profit university with its principal place of business located at 77 Massachusetts Avenue, Cambridge, Massachusetts 02139. At all times relevant, MIT has and continues to receive federal funding.

JURISDICTION AND VENUE

19. This Court has subject matter jurisdiction under 28 U.S.C. § 1331 and § 1343 over the claims arising under Title VI of the Civil Rights Act of 1964 (Title VI") (42 U.S.C. § 2000d, *et seq.*

20. This Court has personal jurisdiction over Defendant because it is located and operates in Massachusetts.

21. Venue is proper pursuant to 28 U.S.C § 1391, because Defendant is registered to conduct business in the District of Massachusetts, has its principal place of business in this District, and a substantial portion of the acts at issue transpired in this District.

STATEMENT OF FACTS

I. Antisemitism and Antizionism are Discriminatory and Violate Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d, et seq.

22. Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d *et seq.*, prohibits discrimination on the basis of race, color, or national origin in any program or activity that receives federal funding or other federal financial assistance. Title VI protects all students, including Jewish students, from such discrimination in federally funded programs or activities.

23. In December 2019, President Trump issued Executive Order 13899 on Combating Anti-Semitism (the “Executive Order”), directing the executive branch to enforce Title VI against discrimination “rooted in anti-Semitism as vigorously as against all other forms of discrimination prohibited by Title VI,” and in doing so required agencies tasked with Title VI enforcement to utilize the International Holocaust Remembrance Alliance (“IHRA”) Working Definition of Antisemitism (“IHRA Definition”), which includes the following:

Antisemitism is a certain perception of Jews, which may be expressed as hatred toward Jews. Rhetorical and physical manifestations of antisemitism are directed toward Jewish or non-Jewish individuals and/or their property, toward Jewish community institutions and religious facilities.³

24. The Office for Civil Rights (“OCR”) of the U.S. Department of Education (“DOE”) expressed its commitment to applying the IHRA Definition on January 19, 2021, in a set of questions and answers⁴ that OCR issued regarding the executive order. And on January 4, 2023, DOE Assistant Secretary for Civil Rights, Catherine Lhamon, publicly reaffirmed OCR’s “commitment to complying with Executive Order 13899” in an email announcing the release of OCR’s new fact sheet on “Title VI Protection from Discrimination Based on Shared Ancestry or

³https://www.holocaustremembrance.com/sites/default/files/press_release_document_antisemitism.pdf.

⁴<https://www2.ed.gov/about/offices/list/ocr/docs/qa-titleix-anti-semitism-20210119.pdf>

Ethnic Characteristics.”⁵ The continued relevance of the fact sheet and question and answer documents was further reiterated in OCR’s “Dear Colleague” letters dated May 25, 2023⁶ and November 7, 2023⁷ (which referred to both of those documents in their lists of resources).

25. The U.S. Department of State, which also adopted the IHRA Definition, provides additional guidance on what constitutes antisemitism, including the following:

Contemporary examples of antisemitism in public life, the media, schools, the workplace, and in the religious sphere could, taking into account the overall context, include, but are not limited to:

- Calling for, aiding, or justifying the killing or harming of Jews in the name of a radical ideology or an extremist view of religion.
- Making mendacious, dehumanizing, demonizing, or stereotypical allegations about Jews as such or the power of Jews as collective — such as, especially but not exclusively, the myth about a world Jewish conspiracy or of Jews controlling the media, economy, government or other societal institutions.
- Accusing Jews as a people of being responsible for real or imagined wrongdoing committed by a single Jewish person or group, or even for acts committed by non-Jews.
- Denying the fact, scope, mechanisms (e.g. gas chambers) or intentionality of the genocide of the Jewish people at the hands of National Socialist Germany and its supporters and accomplices during World War II (the Holocaust)
- Accusing the Jews as a people, or Israel as a state, of inventing or exaggerating the Holocaust.
- Accusing Jewish citizens of being more loyal to Israel, or to the alleged priorities of Jews worldwide, than to the interests of their own nations.
- **Denying the Jewish people their right to self-determination, e.g., by claiming that the existence of a State of Israel is a racist endeavor.**
- **Applying double standards by requiring of it a behavior not expected or demanded of any other democratic nation.**

⁵ <https://www2.ed.gov/about/offices/list/ocr/docs/ocr-factsheet-shared-ancestry-202301.pdf>

⁶ <https://www2.ed.gov/about/offices/list/ocr/docs/antisemitism-dcl.pdf>

⁷ <https://www2.ed.gov/about/offices/list/ocr/letters/colleague-202311-discrimination-harassment-shared-ancestry.pdf>

- **Using the symbols and images associated with classic antisemitism (e.g., claims of Jews killing Jesus or blood libel) to characterize Israel or Israelis.**
- **Drawing comparisons of contemporary Israeli policy to that of the Nazis.**
- **Holding Jews collectively responsible for actions of the state of Israel.**

Antisemitic acts are criminal when they are so defined by law (for example, denial of the Holocaust or distribution of antisemitic materials in some countries).

Criminal acts are antisemitic when the targets of attacks, whether they are people or property – such as buildings, schools, places of worship and cemeteries – are selected because they are, or are perceived to be, Jewish or linked to Jews.

Antisemitic discrimination is the denial to Jews of opportunities or services available to others and is illegal in many countries.⁸

26. Since at least September 2004, it has been the policy of OCR, the agency responsible for enforcing Title VI at educational institutions, to investigate claims related to antisemitism. And in an October 26, 2010 letter to federally funded schools, OCR confirmed that such schools must address antisemitic harassment under Title VI. According to OCR’s letter, such harassment violates Title VI when it creates a “hostile environment” in which “the conduct is sufficiently severe, pervasive, or persistent so as to interfere with or limit a student’s ability to participate in or benefit from the services, activities, or opportunities offered by a school” or when the harassment is “encouraged, tolerated, not adequately addressed, or ignored by school employees.”⁹

27. OCR has required schools to take “immediate and appropriate action to investigate or otherwise determine what occurred” when responding to harassment claims, and, when such investigations reveal that discriminatory harassment occurred, schools “must take prompt and

⁸ <https://www.state.gov/defining-antisemitism/> (emphasis added).

⁹ <https://www2.ed.gov/about/offices/list/ocr/letters/colleague-201010.html>

effective steps reasonably calculated to end the harassment, eliminate any hostile environment and its effects, and prevent the harassment from recurring.”¹⁰

28. Both the Trump and Biden administrations have since confirmed the urgent necessity under Title VI to combat antisemitism.

29. On January 4, 2023, DOE, citing the “rise in anti-Semitic incidents,” released a fact sheet entitled “Protecting Students from Discrimination Based on Shared Ancestry or Ethnic Characteristics,” which notes that Title VI’s protections extend to “students who experience discrimination, including harassment, based on their shared ancestry or ethnic characteristics or citizenship or residency in a country with a dominant religion or distinct religious identity.”¹¹

30. On May 25, 2023, President Biden released The U.S. National Strategy to Counter Antisemitism, which his administration described as the “most ambitious and comprehensive U.S. government-led effort to fight antisemitism in American history,”¹² and DOE launched its Antisemitism Awareness Campaign.¹³ As part of that campaign, OCR released a letter reminding schools of their legal obligations under Title VI to provide all students, including Jewish students, a school environment free from discrimination and to take immediate and appropriate action to respond to harassment that creates a hostile environment. On September 28, 2023, as part of President Biden’s National Strategy to Counter Antisemitism, eight federal agencies confirmed

¹⁰ https://www2.ed.gov/about/offices/list/ocr/letters/colleague-201010_pg2.html

¹¹ <https://www2.ed.gov/about/offices/list/ocr/docs/ocr-factsheet-shared-ancestry-202301.pdf>

¹² <https://www.whitehouse.gov/wp-content/uploads/2023/05/U.S.-National-Strategy-to-Counter-Antisemitism.pdf>

¹³ <https://www.ed.gov/news/press-releases/us-department-education-launches-antisemitism-awareness-campaign>

again that Title VI prohibits antisemitic forms of discrimination in federally funded programs and activities.¹⁴

31. On November 7, 2023, OCR released a letter “remind[ing] colleges, universities, and schools that receive federal financial assistance of their legal responsibility under Title VI . . . to provide all students a school environment free from discrimination based on race, color, or national origin, including shared ancestry or ethnic characteristics.”¹⁵ The letter states: “It is your legal obligation under Title VI to address prohibited discrimination against students and others on your campus—including those who are perceived to be Jewish [or Israeli] . . . in the ways described in this letter.”¹⁶

II. MIT, as a Private Institution, Has the Authority to Control Hateful Speech and Discrimination against Jews on Its Campus.

32. MIT is a private university, and as shown in the MIT policies outlined below, has broad power and authority to address antisemitism that impacts its students, faculty, and staff.

a. MIT’s Code of Conduct

33. MIT makes available to each student, parent and prospective student a copy of the student handbook. This handbook, called the MIT Mind and Hand Book, is available online and outlines the university’s expectations for students.¹⁷

34. The handbook contains several provisions that govern student behavior.

¹⁴ <https://www.whitehouse.gov/briefing-room/statements-releases/2023/09/28/fact-sheet-biden-harris-administration-takes-landmark-step-to-counter-antisemitism/>

¹⁵ <https://www2.ed.gov/about/offices/list/ocr/sharedancestry.html>

¹⁶ *Id.*

¹⁷ <https://handbook.mit.edu/sites/default/files/images/2023-2024%20Mind%20And%20Hand%20Book%20PDF%20Copy.pdf>

35. Section II(4) governs Assault and Reckless Endangerment and states, “MIT prohibits physical abuse of oneself or others and reckless endangerment of oneself or others. Physical abuse is violence of any nature against any person; fighting; assault; battery; the use of a knife, gun, or other weapons; restraining or transporting someone against their will; or any action that threatens or endangers the physical health or safety of any person or causes reasonable apprehension of such harm. Reckless endangerment is conduct that could reasonably and foreseeably result in physical injury even if no injury actually occurs.”

36. Section II(5) governs Community Well-Being and states, in relevant part, “MIT expects that members of the MIT community will not engage in behavior that...has serious ramifications for their own physical and mental health, safety, welfare, academic well-being, professional obligations, or for that of others. In situations where an individual student’s physical illness or emotional difficulties affect not only the student, but also others in the community, it is the Institute’s responsibility to consider the well-being of the community as well as the individuals in care decisions.”

37. Section II(7) of the handbook governs discrimination and discriminatory harassment. The preamble states, in relevant part, “In order to create a respectful, welcoming, and productive community, the Institute is committed to providing a living, working, and learning environment that is free from discrimination and discriminatory harassment.”

38. The preamble further defines the scope and reach of the discrimination policy: “These policies apply to conduct that occurs on MIT property or off-campus, or when an MIT student is representing or acting on behalf of the Institute, conducting Institute business, or attending Institute-funded or Institute-sponsored activities such as a conference. In addition, these

policies may apply to conduct that occurs outside the MIT academic environment if that conduct affects the work or educational environment.”

39. MIT’s discrimination policy further states, “The standards for finding a violation of law are different from the standards used by MIT in determining whether there has been a violation of MIT’s policy.”

40. According to the discrimination policy, “The outcome of disciplinary action can include a warning, probation, suspension, expulsion, or degree revocation.”

41. Section II(5)(b) contains MIT’s nondiscrimination policy and specifically indicates that MIT “is committed to the principle of equal opportunity in education and employment. The Institute prohibits discrimination against individuals on the basis of race, color, sex, sexual orientation, gender identity, pregnancy, religion, disability, age, genetic information, veteran status, or national or ethnic origin in the administration of its educational policies, admissions policies, employment policies, scholarship and loan programs, and other Institute administered programs and activities[.]”

42. Section II(7)(D)(1) covers harassment based on protected class. In this section, MIT states, “the Institute is particularly committed to eliminating harassment based on those categories. Harassment that is based on an individual’s race, color, sex, sexual orientation, gender identity, pregnancy, religion, disability, age, genetic information, veteran status, or national or ethnic origin is not only a violation of MIT policy but may also violate federal and state law, including Title IX of the Education Amendments of 1972 and Mass. General Laws Chapter 151B.”

43. Section II(13) governs harassment. The policy outlines what does and does not constitute harassment according to MIT:

Harassment is defined as unwelcome conduct of a verbal, nonverbal or physical nature that is sufficiently severe or pervasive to create a work or academic

environment that a reasonable person would consider intimidating, hostile or abusive and that adversely affects an individual's educational, work, or living environment.

In determining whether unwelcome conduct is harassing, the Institute will examine the totality of the circumstances surrounding the conduct, including its frequency, nature and severity, the relationship between the parties and the context in which the conduct occurred. Below is a partial list of examples of conduct that would likely be considered harassing, followed by a partial list of examples that would likely not constitute harassment:

- Examples of possibly harassing conduct: Public and personal tirades; deliberate and repeated humiliation; deliberate interference with the life or work of another person; the use of certain racial epithets; deliberate desecration of religious articles or places; repeated insults about loss of personal and professional competence based on age.
- Examples of conduct that is likely not harassment: Administrative actions like performance reviews (including negative performance reviews) and making work assignments; other work-related decisions like moving work areas or changing work colleagues; and isolated incidents (unless, as noted above, they are very severe, such as the use of certain racial epithets).

44. MIT maintains broad authority to regulate harassing conduct, even when it does not necessarily violate the harassment policy:

Conduct that does not rise to the level of harassment may still violate Section 9.2. Even conduct that does not violate an MIT policy may be inappropriate and any inappropriate conduct should be addressed by the supervisor or department head.

45. While MIT's harassment policy is not limited to harassment based on the protected categories listed in Section 9.3, the Institute is particularly committed to eliminating harassment based on those categories. Harassment that is based on an individual's race, color, sex, sexual orientation, gender identity, pregnancy, religion, disability, age, genetic information, veteran status, or national or ethnic origin is not only a violation of MIT policy but may also violate federal and state law, including Title IX of the Education Amendments of 1972, Title VII of the Civil Rights Act of 1964, and Mass. General Laws Chapter 151B.

46. Section II(18) governs expectations of student behavior and integrity and states:

MIT expects that all students come to the Institute for a serious academic purpose and expects them to be responsible individuals who conduct themselves with high standards of honesty, fairness, respect, integrity, and accountability in both their academic and non-academic lives. Students are expected to uphold a high standard of civility and to demonstrate their respect for all members of this diverse community. These expectations are fundamental to the principle of independent learning and professional growth and to the maintenance of a healthy living and learning environment.

47. Section II(21) covers off-campus misconduct and states that MIT reserves the right to take disciplinary action “if the Institute considers that such alleged misconduct may have violated Institute policy and expectations of civility, integrity, and respect. The Institute will determine, on a case-by-case basis, if it is appropriate to address a complaint of this kind.”

48. Section II(22) prohibits “[m]alicious or unauthorized conduct that attempts to, actually does, or is reasonably likely to damage, deface, or destroy Institute property or property belonging to another.”

49. Section II(24) “prohibits threats, intimidation, coercion, and other conduct that can be reasonably, objectively construed to threaten or endanger the mental or physical health or safety of any person.”

50. Section II(10) governs freedom of expression. The policy states, in relevant part:

Freedom of expression is essential to the mission of a university. So is freedom from unreasonable and disruptive offense. Members of this educational community are encouraged to avoid putting these essential elements of our university to a balancing test.

...

With respect to materials posted on bulletin boards, it is not appropriate to remove or deface signed posters, even if some people find such material offensive. If you are offended by a poster signed by a person or group in the MIT community, it is appropriate to convey your sense of offense to those who created the poster. It is not appropriate to remove or deface the poster.

b. MIT’s Chalking Policy and Removal of Posters:

51. MIT has a policy that governs chalking, which states:

Chalking is permitted by Institute groups on sidewalks and pathways on campus to promote their events or activities ... Chalking is not allowed on buildings, steps, or interior locations. Chalkings must clearly identify the group that is responsible for them.

...

In general, large banners or flags may not be displayed at MIT by individuals or groups without MIT's permission. Individual residence halls may temporarily display banners in accordance with Housing & Residential Services ("HRS") policy.

Other temporary displays, such as sandwich boards and similarly sized displays, are permitted for limited time periods solely to promote Institute events or activities and/or provide directions to campus locations. These displays cannot block corridors or access to buildings, streets, paths, or sidewalks, and must comply with all of the above requirements, including clearly identifying the group that is responsible for them. Institute groups may also seek permission from the Division of Student Life or Institute Events for the temporary use of larger displays in locations such as the Stratton Student Center, Lobby 7, or Lobby 10.¹⁸

52. Similarly, MIT has a policy concerning the removal of posters:

Posters on Institute Display Spaces are usually removed several times a week by the Department of Facilities. Groups that control their own display spaces should establish a process for the regular removal of posters that are no longer relevant to their community or that do not comply with any rules the group has established for their spaces.

Individuals or groups may not remove posters on Institute Display Spaces on their own, nor may they alter or deface them. Institute groups may cover posters for events or activities that have already passed, if multiple identical posters are preventing other posters from being put up, or if posters are hung by non-MIT individuals or groups. In addition, an MIT group can remove their own posters.¹⁹

¹⁸ <https://policies.mit.edu/policies-procedures/120-relations-public-use-mit-name-and-facilities-use/125-use-facilities/1255#:~:text=Chalking%20is%20permitted%20by%20Institute,that%20is%20responsible%20for%20them.>

¹⁹ <https://policies.mit.edu/policies-procedures/120-relations-public-use-mit-name-and-facilities-use/125-use-facilities/1255#:~:text=Chalking%20is%20permitted%20by%20Institute,that%20is%20responsible%20for%20them.>

c. MIT's Policy on Events, Vigils, Protests, and Demonstrations

53. MIT has a policy that governs events, vigils, protests, and demonstrations (“Events Policy”) that is publicly available.²⁰

54. The Events Policy applies to MIT students, faculty, and staff, as well as visitors.

55. According to the Events Policy, “MIT recognizes that freedom of expression is essential to the Institute’s mission as long as it does not unreasonably interfere with or disrupt Institute events, programs, activities, academics, research, or operations (collectively, “Institute Activities”).”

56. The Events Policy further allows for freedom of expression **that does not violate MIT policies.**

57. The Events Policy dictates that exercising free expression on campus comes with the following general conditions:

- a. “Such expression must not be used for purposes of harassment, discrimination, retaliation, invasion of personal privacy, defamation, threats or violence, targeting of groups or individuals[.]”
- b. “Individuals and groups must comply with the law and all MIT policies, including policies for MIT student groups, Institute Events procedures, MIT’s use of facilities policy, and MIT’s postering policy.”
- c. “Institute Activities may not be unreasonably interfered with or disrupted, and access to an Institute event or facility, including any means of egress, may not be blocked or obstructed.”

²⁰ https://studentlife.mit.edu/system/files/2023-11/202031103-mit-guidelines-on-speakers-protests-and-demonstrations-final_1.pdf

- d. “Invited speakers are also generally free to express their views, even if controversial. Dissenting members of the community may protest and express disagreement, but they may not unreasonably interfere with or disrupt a speaker’s ability to speak or attendees’ ability to attend or hear the speaker.”
 - e. “Institute groups who wish to organize vigils, protests, or demonstrations (including counterprotests) are required to meet with Institute officials in advance and must honor reasonable time, place, and manner restrictions dictated by the Institute, including restrictions on sound amplification.”
 - f. Safety and security of the MIT community at such events is paramount. In the event that conduct interferes with or disrupts an Institute Activity, a representative of the Institute may request the conduct to stop or ask the person or group to leave the area or relocate to a more suitable area. If the conduct continues despite a request to stop, MIT reserves the right to take appropriate action, including but not limited to postponing the event, taking disciplinary action, or, where the safety of the community is threatened, taking steps to remove the person or group from campus.”
58. MIT’s Events Policy also provides guidance on the use and organization of events:
- MIT has preferred locations for vigils, protests, and demonstrations (including counterprotests) (collectively referred to as “demonstrations”). These locations include the Stratton Student Center, the steps of the Dertouzos (Stata) Amphitheater, Kresge Oval, McDermott Court, and Hockfield Court. Demonstrations on the MIT campus may only be organized by Institute groups such as academic departments, administrative offices, and recognized student, faculty, staff, and employee organizations. Those groups must reserve space at least three business days in advance of their demonstrations through Institute Events or Campus Activities Complex. Demonstrations are not permitted to be conducted in faculty or administrative offices, classrooms, libraries, study rooms, or similar locations that would disrupt Institute Activities. Demonstrations must not unreasonably interfere with or disrupt an Institute Activity. Groups organizing demonstrations are required to meet with Institute officials at

least three business days in advance of the demonstration, must follow instructions from Institute officials before and during the demonstration, and must honor reasonable time, place, and manner restrictions, including restrictions on sound amplification. Failure to comply with these guidelines may result in MIT requiring individuals or groups to relocate or alter or cease their conduct, and may also lead to disciplinary action.

III. The Evolution of Antisemitism

59. Antisemitism is not new. Antisemitism has evolved and has been repackaged over thousands of years. As recognized in the IHRA Working Definition, discussed above, Jews have been victimized for a variety of alleged evils, including killing Jesus Christ, refusing to accept Jesus Christ as the Messiah, being usurers, traitors, an inferior race, and most recently, because their Jewish identity is tied to the modern state of Israel (i.e., for being Zionists).

a. Antisemitism as Religious Discrimination

60. Modern antisemitism includes Jews being blamed for the crucifixion of Jesus and then for failing to accept Jesus as the Messiah.²¹ Indeed, it was not until the 1960s that the Catholic Church officially repudiated the charge that the Jews had murdered Jesus Christ.²²

61. From approximately 300-600 C.E.,²³ Jews were forbidden to marry Christians (399 C.E.), were prohibited from holding positions in government (439 C.E.), and were prevented from appearing as witnesses against Christians in court (531 C.E.).²⁴

²¹<https://www.ushmm.org/antisemitism/what-is-antisemitism/why-the-jews-history-of-antisemitism>

²²<https://www.ushmm.org/antisemitism/what-is-antisemitism/why-the-jews-history-of-antisemitism>

²³ “C.E.” or the “Common Era” is the equivalent of “A.D.,” which is Latin for “in the year of the Lord,” referring to Jesus.

²⁴ <https://www.adl.org/sites/default/files/documents/assets/pdf/education-outreach/Brief-History-on-Anti-Semitism-A.pdf>

62. As Jews were officially being ostracized, certain bizarre fantasies about Jews arose in Northern Europe that foreshadowed the antisemitism of the 20th century. It was around this time that false rumors that Jews had horns and tails and engaged in ritual murder of Christians began to circulate. The latter allegation, referred to as “blood libel,” was devised by Thomas of Monmouth in 1150 to explain the mysterious death of a Christian boy. This theme recurs in English and German myths.²⁵

63. In 1095, Pope Urban II called for the liberation of Jerusalem. Christian crusaders set off to free the Holy Land from the Muslims. The Crusader army swept through Jewish communities looting, raping and massacring Jews as they went. This represented the dawn of the pogrom—the organized massacre of a targeted group of people.²⁶

64. “Throughout the Middle Ages, Christians persecuted Jews. Portrayed as alien, Jews were regarded as usurers. Illustrations depicted Jews as the devil, with horns and cloven feet, and showed them using the blood of Christian children in ritual sacrifices. These lies came to be taken as truth.”²⁷

65. For centuries, based in large part on the belief that Jews were evil and unwilling to accept the word of God, Jews were prohibited from owning land and holding public office. Whole professions refused to admit Jews.²⁸

²⁵ <https://www.adl.org/sites/default/files/documents/assets/pdf/education-outreach/Brief-History-on-Anti-Semitism-A.pdf>

²⁶ <https://www.ushmm.org/antisemitism/what-is-antisemitism/why-the-jews-history-of-antisemitism>; <https://www.adl.org/sites/default/files/documents/assets/pdf/education-outreach/Brief-History-on-Anti-Semitism-A.pdf>

²⁷ <https://www.ushmm.org/antisemitism/what-is-antisemitism/why-the-jews-history-of-antisemitism>

²⁸ <https://www.ushmm.org/antisemitism/what-is-antisemitism/why-the-jews-history-of-antisemitism>

66. Since Jews were not allowed to own land and the Church did not allow Christians to loan money for profit, Jews had few alternatives but to become moneylenders. Once they became associated with the forbidden trade of usury—the practice of lending money and charging high interest—a new set of stereotypes evolved around the Jews as money-hungry and greedy. As moneylenders, Jews were frequently useful to rulers who used their capital to build cathedrals and outfit armies. So long as the Jews benefited the ruler, either through finance or by serving as convenient scapegoats, they were tolerated. However, this did not stop rulers of various countries from expelling their Jews: Jews were expelled from England in 1290, France in 1394, and Spain in 1492.²⁹

67. During the middle of the 14th century, the Bubonic Plague spread throughout Europe, killing an estimated one-third of the population. In the midst of fear, superstition, and ignorance, people looked for someone to blame, and the Jews were a convenient scapegoat because of the myths and stereotypes that were already believed about them. Though Jews were also dying from the plague, they were accused of poisoning wells and spreading the disease. In Germany and Austria, it is estimated that 100,000 Jews were burned alive for this and other false accusations, including using the blood of Christian boys to make Passover matzoh and for desecrating sacramental wafers. Stereotypes in Christian church art were used to inflame the masses.³⁰

68. “In several countries, secular and religious states forced Jews into segregated districts later called ghettos. England, France, Spain, Portugal, and many German states expelled

²⁹ <https://www.adl.org/sites/default/files/documents/assets/pdf/education-outreach/Brief-History-on-Anti-Semitism-A.pdf>

³⁰ <https://www.adl.org/sites/default/files/documents/assets/pdf/education-outreach/Brief-History-on-Anti-Semitism-A.pdf>

masses of Jews—most of whom migrated eastward taking with them their religious convictions and traditions.”³¹

b. Antisemitism Morphs into a Political, Economic, and Social Movement

69. “In 1517, Martin Luther attacked the Pope and corruption within his own Roman Catholic Church, beginning the Protestant Reformation. The young Luther hoped that tolerance would persuade Jews to convert. But when Jews adhered to their own religious beliefs and refused to join his new reformed church, Luther’s disappointment turned to hatred”:

*What then shall we Christians do with this rejected and condemned people, the Jews? . . . Their synagogues . . . should be set on fire, and what does not burn must be covered over with earth so that no man will ever see stone or cinder of them again. . . . Their houses also should be razed and destroyed. . . . All their prayer books. . . should be taken from them.*³²

70. Martin Luther also wrote a pamphlet in 1545, entitled “The Jews and Their Lies,” claiming that Jews thirsted for Christian blood. Luther urged his followers to kill Jews. Martin Luther’s pamphlet was later reprinted by the Nazis in 1935. Some scholars feel that these scurrilous attacks mark the transition from anti-Judaism (attacks motivated because of the Jews’ refusal to accept Christianity) to anti-Semitism (hatred of Jews as a so-called race that would contaminate the purity of another race).³³

71. In France in 1894, Captain Alfred Dreyfus, the only Jewish member of the French Army’s general staff, was falsely accused and convicted of passing military secrets to Germany.

³¹ <https://www.ushmm.org/antisemitism/what-is-antisemitism/why-the-jews-history-of-antisemitism>

³² <https://www.ushmm.org/antisemitism/what-is-antisemitism/why-the-jews-history-of-antisemitism>

³³ <https://www.adl.org/sites/default/files/documents/assets/pdf/education-outreach/Brief-History-on-Anti-Semitism-A.pdf>

When evidence was discovered that Dreyfus was innocent, it was quickly covered up by French Officers of the General Staff who wanted to blame the crime on a Jew. This event, now known as “the Dreyfus Affair,” is emblematic of the antisemitism that pervaded France at the time.³⁴

72. Once again, these events show antisemitism as not purely religious discrimination, but also as being a secular, social, and political movement.³⁵

73. Around 1900, Jews were falsely accused of conspiring to dominate the world using their money and intelligence to manipulate trusting Christians. Russian secret police forged a document to support the story of a take-over plot supposedly authored by a conference of Jewish leaders. A proven forgery, *The Protocols of the Elders of Zion* was nevertheless translated into every major language and distributed worldwide. It is circulated even today despite indisputable proof that it is a fake.³⁶

74. To divert popular discontent at appalling living conditions and autocratic control, Russian authorities encouraged antisemitic violence against Russian Jews who were mostly extremely poor; Jews were blamed for the assassination of Czar Alexander II in 1881, as well as any number of smaller problems that occurred in the country. Pogroms, murderous rampages against Jews, erupted in Russia many times during the next three decades.”³⁷

³⁴<https://www.ushmm.org/antisemitism/what-is-antisemitism/why-the-jews-history-of-antisemitism>

³⁵ See <https://www.ushmm.org/antisemitism/what-is-antisemitism/why-the-jews-history-of-antisemitism>

³⁶<https://www.ushmm.org/antisemitism/what-is-antisemitism/why-the-jews-history-of-antisemitism>

³⁷<https://www.ushmm.org/antisemitism/what-is-antisemitism/why-the-jews-history-of-antisemitism>

75. Between 1917 and 1921, more than 500 Jewish communities in Ukraine were wiped out during pogroms, and approximately 60,000 Jewish men, women, and children were murdered.³⁸

76. “The second half of the 19th century saw the emergence of yet another kind of antisemitism. At its core was the theory that Jews were not merely a religious group but a separate “race”—Semites—set apart because of genetically inherited characteristics.”³⁹

77. By making antisemitism an issue of race, rather than religion, Jews could not escape antisemitism by assimilating into society as some had previously done. Antisemites believed Jews were dangerous and threatening because of their “Jewish blood.” Antisemitic racism united pseudoscientific theories with centuries-old anti-Jewish stereotypes. These ideas gained wide acceptance.⁴⁰

78. “The devastation of World War I, the demeaning peace of Versailles, the hyperinflation of the 1920s, and the depression of 1929 fueled mass discontent. The presence of Jews in German cultural, economic, and political life made them convenient scapegoats for Germany’s misfortunes.”⁴¹

79. Adolf Hitler viewed world history as a racial struggle for survival of the fittest. He saw Jews as the source of all evil: disease, social injustice, cultural decline, both capitalism and all

³⁸ <https://www.adl.org/sites/default/files/documents/assets/pdf/education-outreach/Brief-History-on-Anti-Semitism-A.pdf>

³⁹ <https://www.ushmm.org/antisemitism/what-is-antisemitism/why-the-jews-history-of-antisemitism>

⁴⁰ See <https://www.ushmm.org/antisemitism/what-is-antisemitism/why-the-jews-history-of-antisemitism>

⁴¹ <https://www.ushmm.org/antisemitism/what-is-antisemitism/why-the-jews-history-of-antisemitism>

forms of Marxism, especially Communism. Antisemitism became the predominant ideology of the Third Reich.⁴²

80. While the Nazi regime victimized many minorities, the main group targeted by its discrimination and then extermination programs was the Jews. After the Nazis assumed power in Germany, anti-Jewish measures were put into effect one after another: Jewish businesses were boycotted, then seized. Jews were defined and then separated from non-Jews. Jews were excluded from professions and studies. Jewish children were barred from schools. Jews were subjected to public humiliation.⁴³

81. Despite the drastic increase in antisemitism at a societal and government level, most people, including Jews, could not have anticipated what was to come.

82. During World War II, based on the premise that Jews constituted an inferior “race,” the Nazis systematically murdered six million Jews.

83. After the Holocaust, millions of people around the world proclaimed, “Never Again!” If only that were so.

84. Antisemitism did not end with the Holocaust and persists around the world today. Efforts to minimize, deny, or even celebrate the Holocaust are among the many ways antisemitism endures.⁴⁴

⁴²<https://www.ushmm.org/antisemitism/what-is-antisemitism/why-the-jews-history-of-antisemitism>

⁴³<https://www.ushmm.org/antisemitism/what-is-antisemitism/why-the-jews-history-of-antisemitism>

⁴⁴<https://www.ushmm.org/antisemitism-today>

85. Hatred of Jews is fueled by myths, lies, and conspiracy theories. Some advocates of religious, political, and racial ideologies continue to exploit the hatred of Jews to achieve their own ends.⁴⁵

IV. Anti-Zionism is Antisemitism

a. What is Zionism?

86. Zionism, simply put, is the belief that Jews have the right to self-determination in their ancestral homeland of Israel.⁴⁶

87. The Anti-Defamation League (“ADL”) summarized the manner in which Zionism dates back thousands of years for Jews:

While there has been a continuous Jewish presence in the land of Israel over the millennia, the yearning to return to Zion, the biblical term for both the land of Israel and Jerusalem, has been a cornerstone of Jewish communal life since the Romans violently colonized the land, sending Jews into exile two thousand years ago. An earlier exile by the Babylonians produced perhaps the most well-known lamentation “By the rivers of Babylon, there we wept as we remembered Zion.” That connection between Jews and the land, and the hope for repatriation, is deeply embedded in Jewish prayer, ritual, literature and culture.⁴⁷

b. Zionism and Jewish Identity

88. Jewish identity is defined by more than common religious practice. Jews share an ancestral and ethnic heritage that is rooted in the Land of Israel. Most Jews around the world today take pride in this ancestral and ethnic heritage. For them, as for many Jewish students at MIT, Zionism and the historic connection of Jews to the Land of Israel form an integral part of their Jewish identity.

⁴⁵ <https://www.ushmm.org/antisemitism-today>

⁴⁶ <https://www.worldjewishcongress.org/en/anti-zionism>

⁴⁷ <https://www.adl.org/resources/backgrounders/zionism>

89. Israel is the birthplace of Jewish ethnic identity, language, culture, traditions, and religion, and Jews have maintained a constant presence there for over 3,000 years. Zionism represents the Jewish people's unbreakable bond with their ancestral home, and the Jews' continuous yearning for self-determination in their ancestral homeland.

90. For most Jews, therefore, "Zionism" is not a political viewpoint; rather, it is a key component of their Jewish ethnic and ancestral identity.

91. There are only 15 million Jews on earth today. Nearly half of them live in the State of Israel.

92. Jews have endured oppression and violence across Europe and the Middle East, including genocide. Anti-Jewish bigotry still threatens Jews worldwide. Israel's existence and well-being are, therefore, vital to the Jewish people's safety, survival, and human rights.

93. In this context, demanding that Jews who take pride in the Jews' ancestral connection to Israel and care about the survival of the Jewish people deny Israel's right to exist is tantamount to demanding that Jews shed the ethnic component of their Jewish identity. Denying that Jews are "a people" with this shared ancestral and ethnic heritage is "erasive antisemitism."

94. Similarly, harassing, marginalizing, ostracizing, or discriminating against a Jew because they identify as Zionist is equivalent to targeting a Jew on the basis of the Jews' shared ethnic and ancestral heritage.

95. While some opponents of the Israeli government or specific Israeli policies call themselves "antizionist," this label is fundamentally incorrect. To be antizionist is to oppose Jewish self-determination in the State of Israel and to support (whether explicitly or tacitly) the destruction of the State of Israel as a Jewish state.

96. Anti-Zionists frequently use phrases like "criticizing Israel isn't antisemitic" to deflect attention from their opposition to Israel's very existence. But Zionism does not require an endorsement of the Israeli government, nor does it preclude support for Palestinian self-determination or a Palestinian state.

97. There are many Zionists who have legitimate criticisms of the Israeli government, just as there are many Americans who may have criticisms of their own government.⁴⁸ However, when criticism is levied as a critique of the existence of Israel altogether, such criticism ceases to be a policy concern and instead becomes antizionist and antisemitic. In short, anti-Zionism is a **movement against an integral part of Jewish identity**, while criticism of the government of Israel speaks to one's political opinions.

V. Antisemitic Acts Have Risen More than 337% Since the October 7 Attacks

98. If more evidence is needed concerning the link between antizionism and antisemitism, the October 7 attacks and its aftermath is the perfect case study.

99. October 7 was the deadliest day for Jews since the Holocaust. Innocents, primarily Jews and Israelis, were kidnapped, raped, burned alive, and slaughtered in the most brutal of ways by members of an internationally recognized terrorist group.

100. If antizionism and antisemitism were not related, it would be reasonable to expect that the impact on American Jews would have been nonexistent.

⁴⁸ <https://www.adl.org/resources/backgrounder/zionism>

101. However, antisemitic incidents in the U.S. have risen a staggering 337% since the October 7 attacks (as of mid-December 2023).⁴⁹ Between October 7 and December 7, 2023 the ADL recorded a total of 2,031 antisemitic incidents, up from 465 incidents during the same period in 2022. This includes 40 incidents of physical assault, 337 incidents of vandalism, 749 incidents of verbal or written harassment and 905 rallies including antisemitic rhetoric, expressions of support for terrorism against the state of Israel and/or anti-zionism. On average, over the 61 days between October 7 and December 7, 2023, Jews in America experienced nearly 34 antisemitic incidents per day. This is no mere coincidence but is directly connected to the October 7 attacks.

VI. Antisemitism on College Campuses Was Problematic Even Before October 7, 2023.

102. Antisemitism on college campuses has been a growing epidemic in the years leading up to the October 7 attacks.⁵⁰

103. On May 25, 2023, OCR issued a “Dear Colleague” letter, which highlighted the rising antisemitism⁵¹ across the nation, including in schools.⁵² This letter placed institutions on notice that they needed to be on the lookout for antisemitism on their own campuses and that it should be addressed promptly.

⁴⁹ *ADL Reports Unprecedented Rise in Antisemitic Incidents Post-Oct. 7*, ADL Press Release, December 11, 2023 (<https://www.adl.org/resources/press-release/adl-reports-unprecedented-rise-antisemitic-incidents-post-oct-7>).

⁵⁰ See <https://www.adl.org/resources/report/anti-israel-activism-us-campuses-2021-2022>.

⁵¹ See generally Federal Bureau of Investigation, Supplemental Hate Crime Statistics, 2021, March 2023; see also, Anti-Defamation League, Audit of Antisemitic Incidents 2022, March 2023 (acknowledging rise in reported antisemitic incidents in K-12 schools and institutions of higher education).

⁵² <https://www2.ed.gov/about/offices/list/ocr/docs/antisemitism-dcl.pdf>

104. The purpose of this letter was to remind schools and universities that “Title VI protects all students, including students who are or are perceived to be Jewish, from discrimination based on race, color, or national origin.”

105. The letter further reminded schools and universities of the following: Schools must take immediate and appropriate action to respond to harassment that creates a hostile environment.⁵³ OCR generally finds that a hostile environment exists where there is harassing conduct that is sufficiently severe, pervasive, or persistent so as to interfere with or limit the ability of an individual to participate in or benefit from the services, activities, or privileges provided by a school.⁵⁴

If a hostile environment based on shared ancestry existed, and the school knew or should have known of the hostile environment, OCR will evaluate whether the school met its obligation under Title VI to take prompt and effective steps reasonably calculated to end the harassment, eliminate any hostile environment and

⁵³ See, e.g., *Zeno v. Pine Plains Cent. Sch. Dist.*, 702 F.3d 655, 670 n.14 (2d Cir. 2012) (citing school districts’ “longstanding legal duty to ‘take reasonable steps to eliminate’ racial harassment in its schools” (quoting OCR’s Racial Incidents and Harassment Against Students at Educational Institutions Investigative Guidance, 59 Fed. Reg. 11448, 11450 (Mar. 10, 1994))). For additional information, please see [Racial Incidents and Harassment Against Students at Educational Institutions Investigative Guidance](#) (March 1994); U.S. Department of Education Office for Civil Rights, [Harassment and Bullying Dear Colleague Letter](#) (October 2010).

⁵⁴ See, e.g., *Zeno*, 702 F.3d at 665-66 (2d Cir. 2012) (explaining that harassment is actionable if it is “‘severe, pervasive, and objectively offensive’ and discriminatory in effect” (quoting *Davis ex rel. LaShona D. v. Monroe Cnty. Bd. of Educ.*, 526 U.S. 629, 650–51 (1999)), and that discriminatory actions restrict “‘an individual in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit’ under the school system” (quoting 34 C.F.R. § 100.3(b)(1))); see also [Racial Incidents and Harassment Against Students at Educational Institutions Investigative Guidance](#) (March 1994); U.S. Department of Education Office for Civil Rights, [Harassment and Bullying Dear Colleague Letter](#) (October 2010).

its effects, and prevent harassment from recurring.⁵⁵ In other words, a school violates Title VI when it fails to take adequate steps to address discriminatory harassment, such as antisemitic harassment.⁵⁶

VII. The Process for Registering a Student Organization at MIT

106. Student groups at MIT are approved by the Association of Student Activities (“ASA”).

107. Student groups may be assigned different statuses: ASA Unfunded, ASA Funded, ASA Sponsored, Club Sport, Non-Res FILG, Res FSILG, or Dorm.

108. Even groups which are unfunded still receive official recognition by the university, can reserve space on campus, and can serve as the basis for a community on campus.⁵⁷

109. Funded groups are supposed to “promote student life for a significant portion of campus, which are significantly unique from existing groups and have a purpose that cannot be fulfilled by other existing student groups, and which have established a track record of excellence. Funded status is harder to obtain, but also gives full access to Student Activities resources.”⁵⁸

110. Both funded and unfunded groups are permitted to use MIT in their names and in event descriptions.⁵⁹ Groups are also permitted to create and host websites through the main MIT web server.⁶⁰

⁵⁵ See U.S. Department of Education Office for Civil Rights, [Harassment and Bullying Dear Colleague Letter](#) (October 2010).

⁵⁶ <https://www2.ed.gov/about/offices/list/ocr/docs/antisemitism-dcl.pdf>

⁵⁷ <https://asa.mit.edu/group-privileges/fundedunfunded-sponsored-groups>

⁵⁸ <https://asa.mit.edu/group-privileges/fundedunfunded-sponsored-groups>

⁵⁹ <https://asa.mit.edu/group-privileges/compare-privileges>

⁶⁰ <https://asa.mit.edu/group-resources/group-websites>

111. All recognized groups on campus must adhere to the MIT Non-Discrimination Clause,⁶¹ which among other things, prohibits discrimination on the basis of race, religion, ancestry, or national or ethnic origin.⁶²

112. The ASA is a joint committee of the Undergraduate Association and the Graduate Student Council. It is responsible for recognizing student groups and activities, allocating student office space, and organizing activities that take place during orientation in August and Campus Preview Weekend each April.

VIII. MIT Violates its own Anti-Discrimination Policies and Allows its Campus to Become a Hostile Environment for Jewish Students.

a. MIT Approves the Registration of Several Anti-Israel and Antisemitic Student Groups on Campus

i. MIT Coalition Against Apartheid

113. The MIT Coalition Against Apartheid (“MIT CAA”) is a registered student group at MIT.⁶³

114. MIT CAA has multiple faculty representatives who teach and/or advise MIT students, including Plaintiffs and SCLJ Members.

115. MIT CAA advertises its mission on its MIT website: “Coalition Against Apartheid is a student group at MIT focused on advancing anti-colonial and anti-apartheid organizing on campus. We support the liberation of all peoples, with a focus on the Israeli occupation of

⁶¹ <https://asa.mit.edu/group-privileges/fundedunfunded-sponsored-groups>

⁶² <https://handbook.mit.edu/nondiscrimination>

⁶³ As of the date of filing this Complaint, MIT has provisionally suspended MIT CAA. The permanent outcome of these proceedings is unknown at this time.

Palestine. In addition to working for administrative and institutional change, we hold events on campus that range from social to educational.”⁶⁴

116. Prior to October 7, 2023, and dating back for years, MIT CAA has a history of disrupting and opposing Jewish and pro-Israel events at MIT’s campus. By way of example, the group has held protests on Israeli Independence Day, has refused to participate in organized dialogue with Israeli and Jewish student leaders, has called for the opposition of “normalization with the Zionists,” and has hosted openly antisemitic speakers on campus. However, MIT CAA’s activities escalated significantly after October 7.

117. As evidenced by MIT CAA’s posts on X (formerly Twitter), MIT CAA does not recognize Israel’s right to exist. Tweets reposted by MIT CAA include the following:

 MIT Coalition Against Apartheid reposted



Jennine @jennineak · Oct 7

Progressive commentators saying Palestinians have entered ‘Israeli territory’... baby, check yourselves. You’re part of the problem.

 MIT Coalition Against Apartheid reposted



Stanley Cohen @StanleyCohenLaw · Oct 7

Palestinians cannot invade Palestine.

⁶⁴ <https://caa.mit.edu/>



118. Following the October 7 attacks, and as discussed in greater detail herein, MIT CAA has openly endorsed the violent attacks against Jews and Israelis and has continued to call for the genocide of Jews and the elimination of Israel⁶⁵ at official group functions on MIT’s campus, which it has the authority to host by virtue of being a registered student group at MIT. As an MIT-registered student group, MIT CAA was subject to MIT’s nondiscrimination policy, but its conduct constituted a violation of that policy.

ii. Palestine@MIT

119. Palestine@MIT’s Facebook page states that the group exists to “raise political and cultural awareness regarding the Palestinian people in the MIT community and greater Boston area.”⁶⁶

120. On its Linktree page, Palestine@MIT invites viewers to “Join the MIT Coalition Against Apartheid,” thereby endorsing MIT CAA’s activities.⁶⁷

⁶⁵ By way of example, such calls have come in the form of “from the river to the sea,” which is understood to be a call for the elimination of the State of Israel; references the October 7 attacks as “revolution;” or asserting that Jewish and Israeli members of the MIT community “can’t hide.” See, e.g., *infra* ¶¶ 140, 145, 190.

⁶⁶ <https://www.facebook.com/palestineatmit>

⁶⁷ <https://linktr.ee/palmit>

121. Unfortunately, Palestine@MIT has strayed far from its mandate by crossing the line from advocating for Palestinian rights to instead calling for the genocide of Jews, supporting the BDS Movement,⁶⁸ and blaming Israel for Hamas' attacks on Israeli civilians:



122. Both MIT CAA and Palestine@MIT used and continue to use their registered student group status and the MIT name to harass and discriminate against Jewish and Israeli students at MIT.⁷⁰

⁶⁸<https://www.facebook.com/BDSNationalCommittee/photos/a.129952410382961/3135299369848235/>

⁶⁹https://www.instagram.com/p/CyJ0qtFpwdY/?img_index=1

⁷⁰<https://asa.mit.edu/group-privileges/fundedunfunded-sponsored-groups;>

b. The Anti-Israel and Antisemitic Groups Approved by MIT Use Their Status to Intimidate and Harass Jewish Students on MIT's Campus

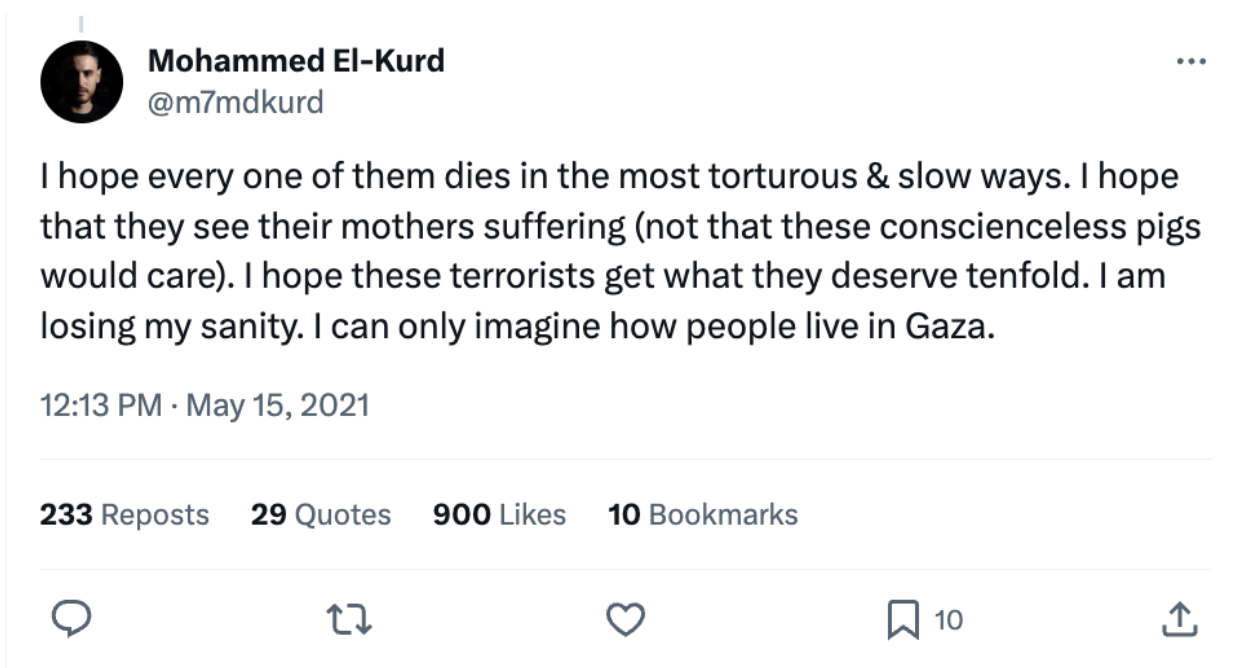
i. Anti-Israel and Antisemitic Groups Approved by MIT Call for Violence against Jews

123. On May 17, 2021, Palestine@MIT posted a picture on its Instagram page of students holding signs at an organized event in front of an MIT building on MIT's campus. One sign reads, "From the River to the Sea."⁷¹

124. As the ADL has explained, "From the River to the Sea" is "an antisemitic slogan commonly featured in anti-Israel campaigns and chanted at demonstrations. This rallying cry has long been used by anti-Israel voices, including supporters of terrorist organizations such as Hamas and the PFLP [Popular Front for the Liberation of Palestine], which seek Israel's destruction through violent means. It is fundamentally a call for a Palestinian state extending from the Jordan River to the Mediterranean Sea, territory that includes the State of Israel, which would mean the dismantling of the Jewish state. It is an antisemitic charge denying the Jewish right to self-determination, including through the removal of Jews from their ancestral homeland."⁷²

⁷¹ https://www.instagram.com/p/CO_5WzVlv9T/

⁷² <https://www.adl.org/resources/backgrounders/allegation-river-sea-palestine-will-be-free>



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128. Nonetheless, El-Kurd's hateful speech did not stop entire departments at MIT from endorsing or even co-sponsoring the Allyship, Art, and Apartheid event. The post announcing the event shows that the event was also co-sponsored by: MIT Department of Women's and Gender

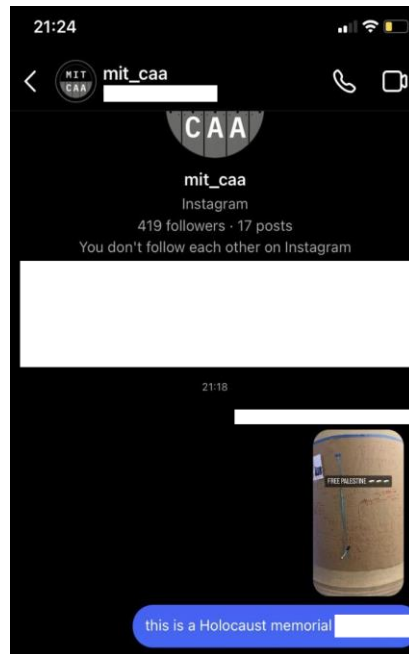
⁷⁵ <https://twitter.com/m7mdkurd/status/1393600442853167109>

⁷⁶ <https://twitter.com/m7mdkurd/status/1743975007947010232>

⁷⁷ <https://twitter.com/m7mdkurd/status/1742358664495640625>

Studies, MIT Libraries, MIT Center for International Studies, and MIT Department of Anthropology. The co-sponsorship of this event by multiple academic departments is indicative of the hostile educational environment to which Jewish and Israeli students and graduate students at MIT, including Plaintiffs and SLJC Members, have been subjected. Academic departments and individual faculty members repeatedly endorse antisemitic positions, using the MIT name to do so, which had (and still has) the effect of making Plaintiffs feel unwelcome at their own institution.

129. On April 18, 2023, MIT CAA’s Instagram featured a post about a Holocaust display on Yom HaShoah. The post showed that the Holocaust memorial had been defaced with “Free Palestine” slogans. The caption on MIT CAA’s picture was “Free Palestine.” This is a stark demonstration of the connection between antisemitism and antizionism, and the reality that antizionism is not a mere political movement but rather an attack against Jewish identity—a Holocaust memorial has nothing to do with the political status of Palestinians yet everything to do with Jewish history and identity.



ii. After October 7, 2023, Anti-Israel and Antisemitic Student Groups' Activities Intensified and Created a Hostile and Unsafe Environment for All MIT Students.

130. On October 8, 2023, only one day after the horrific attacks on Israel, and before the Israeli army had fully launched its defense mission, as noted above, MIT CAA and Palestine@MIT posted on its blog a “Joint Statement on the Current Situation in Palestine.” They also sent an email out to all undergraduate students via MIT’s Dormspam (i.e. MIT’s dormitory email platform) containing the same content.

131. According to the Instagram post from Palestine@MIT on October 8, 2023, the joint statement also was supported by MIT CAA, Palestine@MIT, MIT Black Graduate Student Association, MIT Reading for Revolution, among others.⁷⁸

132. The Joint Statement stated, in relevant part:

Palestine@MIT and the MIT Coalition Against Apartheid hold the Israeli regime responsible for all unfolding violence. We unequivocally denounce the Israeli occupation, its racist apartheid system, and its military rule. Colonization is inherently violent, aimed at erasing and replacing indigenous peoples. We affirm the right of all occupied peoples to resist oppression and colonization.

...

What is happening in occupied Palestine is a response to an ongoing 75 years of occupation. It comes as a response to the settler colonial regime and the systemic oppression against Palestinians.

We are committed to supporting decolonization efforts in Palestine, and we recognize our role to oppose Zionism from within the imperial core.⁷⁹

133. The letter was signed off, “Until liberation,” implying that more violence against Jews was necessary and welcome.⁸⁰

⁷⁸ https://www.instagram.com/p/CyJ0qtFpwdY/?img_index=1

⁷⁹ <https://caa.mit.edu/blog/2023/10/8/statement/>

⁸⁰ <https://caa.mit.edu/blog/2023/10/8/statement/>

134. An Instagram posted jointly by MIT CAA and Palestine@MIT also endorsed the October 7 violence, stating that “Colonization is inherently violent,” and the groups further endorsed “the right of all occupied peoples to resist oppression and colonization.”⁸¹ The “resistance” referred to in the post was the October 7 attacks, which included the brutal murder, rape, torture, and kidnapping of innocents—primarily Jews and Israelis.

135. On October 10, 2023, Jewish students on campus held a vigil in the wake of the October 7 attacks. Counter-protesting students used chalk to write “Free Palestine” and “Occupation on Gaza” directly outside of the vigil. Even though “Free Palestine” might be read as being limited to Gaza and the West Bank, rather than the entirety of the land, including Israel, “from the [Jordan] River to the [Mediterranean] Sea,” and while the phrase “Occupation on Gaza” is also limited in its scope and thus arguably only a political assertion, writing those phrases directly outside of a vigil organized by Jewish students only two days after more than 1,400 innocents, primarily Jews and Israelis were massacred, is clearly antisemitic. The chalking, in violation of MIT policy, was done in an effort to target, harass, and intimidate Jewish students.

136. On October 17, 2023, a student from MIT CAA sent an email to all student group members at MIT using MIT’s email system, falsely stating that “Israel dropped bombs on the al-Ahli Arab Hospital where thousands of Palestinians displaced by the current genocide were seeking shelter and care. Over 500 people and counting were massacred.” Claims that Israel bombed the al-Ahli Hospital have been widely discredited by a variety of governmental and independent sources. It became clear that the damage was actually caused by a rocket launched by

⁸¹ https://www.instagram.com/p/CyJ0qtFpwdY/?img_index=1

the Palestinian Islamic Jihad.⁸² MIT CAA had the ability to email all student group members using MIT's name because of its status as an MIT student group.⁸³ MIT knew or should have known that its email system and name was being used to communicate in this manner with the MIT community, including Plaintiffs and SCLJ Members, but chose to do nothing.

137. Jewish students who responded by sharing information which discredited this rumor were attacked online by their peers. One student encountered such a hostile environment in a study group, that they felt they could no longer participate.

138. The email from MIT CAA then invited all recipients to a rally that was scheduled for October 19, 2023 outside of the MIT Student Center.

139. The rally mentioned in the October 17 email (from MIT CAA) took place two days later on campus. At this rally, Jewish and Israeli students were harassed and assaulted.

140. Plaintiffs and SCLJ Members were personally impacted by on-campus protests and rallies held by student groups, including MIT CAA, which Plaintiffs and SCLJ Members personally witnessed and/or attempted to walk by and/or pass through. Rallies and protests, such as the October 19 rally, included antisemitic harassment and abuse directed toward and/or witnessed by Plaintiffs and SCLJ Members which caused them to feel unsafe and/or unwelcome on campus.

141. Plaintiff Meyer was assaulted by an attendee of the rally. Plaintiff Meyer was standing with another Jewish student when they were approached by the protestor who

⁸² Evidence that the damage was caused by a mid-flight failure of an Islamic Jihad rocket: ([NYT](#), [WSJ](#), [CNN](#), [NPR](#)). [The Senate Intelligence Committee](#), as well as President Joe Biden, have confirmed this investigation, with Biden [telling Israeli PM Netanyahu](#) that it “appears as though it was done by the other team, not you.”

⁸³ <https://asa.mit.edu/group-privileges/compare-privileges>

raised the front wheels of his bike at them and said, “Your ancestors [(referring to Holocaust victims)] didn’t die to kill more people.”

142. Attendees, in large numbers, chanted a variety of slogans, many of which directly call for violence against Jews. These included:

- i.* “Palestine will be free, from the river to the sea!”⁸⁴
- ii.* “There is only one solution! Intifada revolution!”⁸⁵

143. The antisemitic harassment and abuse experienced by Jewish and Israeli students at MIT, including Plaintiffs and SCLJ Members, at rallies and protests was objectively offensive and known to MIT and its administration, through reports, security monitoring of events, and other means. The antisemitic harassment and abuse at rallies and protests violated MIT’s campus policies, including but not limited to its nondiscrimination and harassment policies; however, there were no repercussions for these policy violations.

144. On October 23, 2023, MIT CAA staged a walkout and planned disruptions of classes throughout campus. Protestors left classes and interrupted other classes by shouting, unfurling Palestinian flags in classrooms, and using megaphones to broadcast their message. Protestors left classes and interrupted other classes. Protestors also gathered in the vicinity of Lobby 7, which is not an authorized protest area. Indeed, Lobby 7 is a major thoroughfare (the

⁸⁴ “From the River to the Sea” refers to the elimination of entire nation of Israel, which exists between the Jordan River and the Mediterranean Sea. *See* <https://www.adl.org/resources/backgrounders/slogan-river-sea-palestine-will-be-free>. This is a call not for a two-state solution, but instead a cry for a wholesale elimination of the state of Israel in favor of a Palestinian state in its place.

⁸⁵ “Intifada” literally translates to “uprising” or “shaking off.” The term is used to describe periods of intense Palestinian protest against Israel, mainly in the form of violent terrorism, ranging from single acts of violence to mass suicide bombings. The First Intifada took place from 1987-1990 and the Second Intifada occurred from 2000-2005. *See* <https://www.ajc.org/news/what-does-globalize-the-intifada-mean-and-how-can-it-lead-to-targeting-jews-with-violence>.

entry to MIT's famous Infinite Corridor) through which many students, including Plaintiffs and SCLJ Members, often must travel in order to attend class or other on-campus events.

145. On October 30, 2023, in direct contravention of MIT policy, MIT CAA organized a "Die In" in Lobby 7, which, again, is not a permitted protest space. Protesters also taped up posters (in violation of MIT's policies) of Gazans all over lecture halls and campus buildings. By contrast, MIT selectively enforced its policies against Jewish and Israeli students, requiring removal of their banners and posters calling attention to the terrorist attacks of October 7. As with the other MIT CAA protests before it, MIT took no action to stop this MIT CAA Die In, in spite of the fact that it violated MIT policy and disrupted campus activities.

146. On November 2, 2023, MIT CAA hosted, and its student members participated in, targeted protests outside the offices of Jewish professors and the office of MIT's Israel internship program (MISTI, MIT International Science & Technology Initiatives).

147. According to one professor, "They insistently rattled the door handles of offices that were closed with staff inside; and they congregated outside of and entered the office that facilitates MISTI's programming in the Middle East, and at least one other office. Their chants included: 'From the river to the sea...', 'MISTI, MISTI, you can't hide,' and others associating MISTI with genocide." After the incident, many staff reported feeling alarmed, intimidated and even afraid during the protest. Some staff members said they felt trapped in their offices, anxious about the prospect of verbal and/or physical assault. There were, however, no repercussions for this incident and MIT did not send police.

c. The U.S. Department of Education Addresses College Campuses' Failure to Curtail Antisemitism on Campuses

148. On November 7, 2023, The Biden-Harris administration announced in a press release that the DOE had issued a Dear Colleague letter, reminding schools of their obligations under Title VI of the Civil Rights Act of 1964.⁸⁶

149. The press release specifically stated that Jewish students are covered under the protections afforded by Title VI and called out the rise in reports of antisemitism on college campuses.

150. The press release further reminded colleges that “Schools that receive federal financial assistance have a responsibility to address discrimination when the discrimination involves racial, ethnic, or ancestral slurs or stereotypes; when the discrimination is based on a student’s skin color, physical features, or style of dress that reflects both ethnic and religious traditions, to name a few characteristics. Likewise, schools have a responsibility to address discrimination against students based on the region of the world they come from or are perceived to come from.”

151. MIT is a school that receives federal financial assistance and therefore has an obligation to comply with Title VI and all associated standards.

152. The Dear Colleague letter that was sent to universities, including MIT, stated in no uncertain terms that universities have a “legal obligation under Title VI to address prohibited discrimination against students and others on your campus—including those who are or are perceived to be Jewish, Israeli, Muslim, Arab, or Palestinian...”⁸⁷ In other words, schools may not

⁸⁶ <https://www.ed.gov/news/press-releases/us-department-education-reminds-schools-their-legal-obligation-address-discrimination-including-harassment>

⁸⁷ <https://www2.ed.gov/about/offices/list/ocr/letters/colleague-202311-discrimination-harassment-shared-ancestry.pdf>

simply wait for a wave of antisemitism to blow over. They have an affirmative obligation to address the problem.

153. Indeed, the letter states:

Harassing conduct can be verbal or physical and need not be directed at a particular individual. OCR interprets Title VI to mean that the following type of harassment creates a hostile environment: unwelcome conduct based on shared ancestry or ethnic characteristics that, based on the totality of circumstances, is subjectively and objectively offensive and is so severe or pervasive that it limits or denies a person's ability to participate in or benefit from the recipient's education program or activity. Schools must take immediate and effective action to respond to harassment that creates a hostile environment.

d. In Spite of Admonitions from the President and the Department of Education that Colleges and Universities Have a Responsibility to Address Discrimination against Jewish Students, MIT Allowed Antisemitism to Fester on Campus

154. Rather than heeding the requirements in the Dear Colleague letter sent by the DOE, MIT allowed a large protest to take place only two days later.

155. On November 9, 2023, MIT CAA and the MIT student group Coalition for Palestine, among others, again protested in Lobby 7 on MIT's campus, again in contravention of MIT's policies. MIT CAA also invited the general public to the protest, which, according to MIT CAA's Instagram post, was scheduled to last all day—another violation of MIT policy.⁸⁸

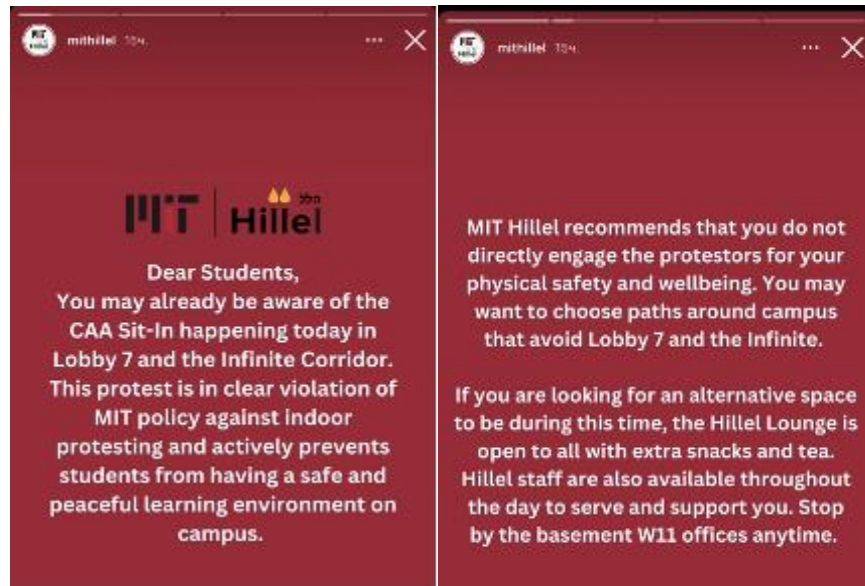
156. As a result of MIT CAA's invite, protestors from all over the city flooded MIT's campus.⁸⁹

157. MIT was aware that these protests were taking place, but rather than enforcing its own policy to appropriately control the manner of the protests, it instead opted to shift the burden

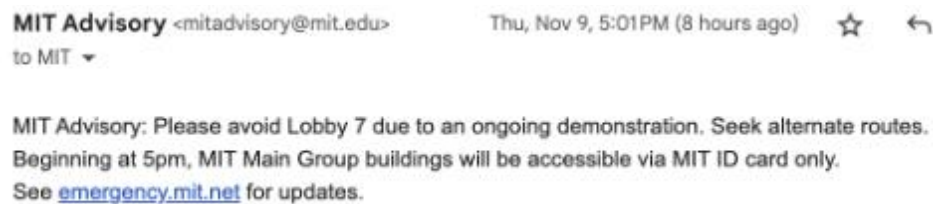
⁸⁸ <https://www.instagram.com/p/CzZLuQROELO/?hl=en>

⁸⁹ https://www.instagram.com/reel/Czb_tNSO1sq/?utm_source=ig_web_copy_link&igshid=MzRlODBiNWFiZA==

and warn Jewish students that, for their own safety, they should stay away from their own campus while outsiders took over those spaces in contravention on MIT policy. Consequently, MIT Hillel posted the following warning to Jewish students:



158. MIT Advisory, an official MIT email account, issued a similar warning to all students on campus, warning them to avoid the unauthorized protests and once again opting to protect the students harassing and discriminating against Jewish and Israeli students, rather than protecting those students and/or enforcing MIT policies:



159. During the Fall of 2023, MIT professors also warned Jewish and Israeli students, including Plaintiffs and SCLJ Members, to avoid the protests for fear of their safety. This is also difficult to do, because Lobby 7 is a central throughfare on campus. While it is possible to enter

campus through other routes, Lobby 7 presents one of the most convenient access points to MIT's campus for students attending classes and other activities. During the protests, calls for violence against Jews were made on several occasions, which were personally observed by and even directed toward Plaintiffs and SCLJ Members. The language used included calls for "intifada," "from the river to the sea," and "Resistance is justified." To be clear, the "resistance" that began these protests was the October 7 attacks—a Hamas orchestrated murder of innocents, primarily Jewish and Israeli civilians.

160. Moreover, MIT professors, faculty, and staff participated in the November 9 protest and also harassed Jewish students.

161. One Jewish student, who was recording the protest on her phone, was shoved by a protestor.

162. In the early afternoon of November 9, 2023, MIT officials warned the protestors that they needed to leave no later than 12:15 pm., or they could face disciplinary action. However, the protestors remained.

163. A publicly posted tweet on X from Professor Retsef Levi detailed the experience of Jewish students, including Plaintiffs and SCLJ Members, on campus that day.⁹⁰

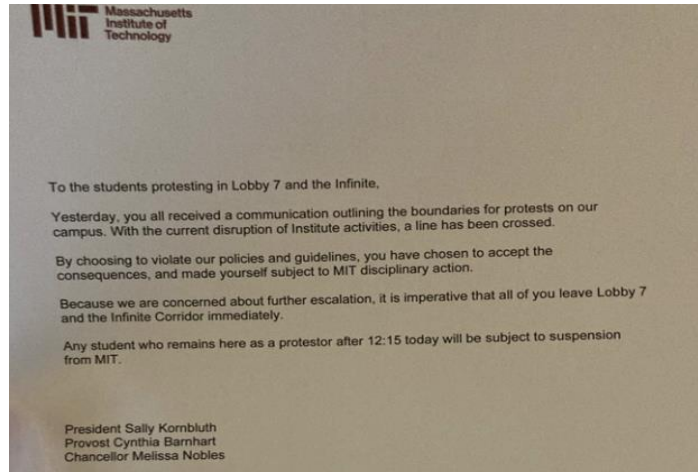
164. Specifically, Professor Levi wrote,

"Jewish and Israeli MIT students were physically prevented from attending a class by a hostile group of pro-Hamas and anti-Israel MIT students that call themselves the CAA. This is after students from the CAA harassed MIT staff members in their offices for being Jewish and interrupted classes in the past few weeks. All of this has occurred with no clear response from the administration. With each passing day, MIT admin's silence makes Jewish and Israeli students feel unsafe at MIT.

⁹⁰https://twitter.com/RetsefL/status/1722852140245254559?ref_src=twsrc%5Etfw%7Ctwcamp%5Etweetembed%7Ctwterm%5E1722852140245254559%7Ctwgr%5Ee9cb43c4af20bbae3b63778489707751471d37b2%7Ctwcon%5Es1_&ref_url=https%3A%2F%2Fwww.dailysignal.com%2F2023%2F12%2F14%2Frenowned-science-engineering-institute-loses-way-woke-leadership-imperiling-jewish-students%2F

Many Jewish students fear leaving their dorm rooms and have stated that they feel MIT is not safe for Jews. This message is compounded by the public and private warnings of Hillel and many faculty that Jewish students should not enter MIT's main lobby today, November 9th, 2023. Instead of dispersing the mob or de-escalating the situation by rerouting all students from Lobby 7, Jewish students specifically were warned not to enter MIT's front entrance due to a risk to their physical safety. The onus to protect Jewish students should not be on the students themselves. MIT administration recently announced guidelines to avoid illegal and unsafe protests on campus. The CAA, which planned the protest, knowingly and proudly violated these requirements, and even invited people from outside of MIT to join them. Their actions inhibit the possibility of safe and peaceful dialogue and endanger Jewish students on campus. The CAA hosted a blockade that not only disregards MIT guidelines, but also obstructs Jewish students from attending classes. Some Jewish students who saw the administration's failure to respond to the targeted harassment of Jews on campus by the CAA came together to support each other and peacefully together stand against this threat to their safety. Four hours after the blockade started, at 12 pm, the MIT administration passed a letter to all students, threatening their suspension if the crowds did not disperse from Lobby 7. Only the Jewish students left immediately. The CAA protesters did not cooperate. Indeed, the CAA proceeded to invite more students and non-MIT protestors to join them in calling for a violent uprising ("Intifada") and justifying the terror attacks of Hamas on Israeli civilians. At 5 pm, all students on campus were warned through MIT's emergency notification system to "avoid Lobby 7" — officially recognizing the danger present to students as a result of this violent protest. No Jewish or Israeli students were present at this point. As of 10:30 tonight MIT has officially decided not to academically suspend CAA students who repeatedly violated the administration's guidelines and threats. They have shown that actions against Jews at MIT do not have consequences. Additionally, in an email to DUSP [Department of Urban Studies and Planning] students, the Department Head indicated that he would protect any DUSP students involved in violating MIT's rules today by protesting with the CAA. Not only do Jewish students feel unsafe on campus, but now they also feel excluded from and unsafe in DUSP. Today, on the 9th of November, on the 85th anniversary of Kristallnacht, which marked the beginning of the Holocaust, Jews at MIT were told to enter campus from back entrances and not to stay in Hillel for fear of their physical safety. We are seeing history repeating itself and Jews on MIT's campus are afraid. Signed, The MIT Israel Alliance and its supporters.

165. Finally, later on November 9, 2023, in a letter signed by MIT President Sally Kornbluth, MIT made a statement *explicitly acknowledging* that the conduct of the protesters violated MIT's policies, as shown in the image below:



166. However, shortly after the announcement was made, other MIT faculty members, including MIT professors, wrote to students and let them know that if they were disciplined for failing to vacate the Lobby 7, students could approach them for support.

167. Subsequently on that same day, MIT President Kornbluth sent a letter to members of the MIT community, addressing the protests.⁹¹ The letter acknowledged that the protests were “disruptive, loud and sustained through the morning hours” and that it “was organized and conducted in defiance of those MIT guidelines and policies” to the point where the administration “had serious concerns that it could lead to violence.” President Kornbluth’s letter further specified that “the administration felt it was essential to take action.”

⁹¹ <https://president.mit.edu/writing-speeches/todays-protest-and-counterprotest>

168. Consequently, students were told they had to vacate Lobby 7 by a certain time, or they would be subject to suspension. While some students left, others remained, despite MIT providing formal notice that doing so was a violation of MIT policy.

169. However, the MIT administration quickly backtracked on this threat: “Because we later heard serious concerns about collateral consequences for the students, such as visa issues, we have decided, as an interim action, that the students who remained after the deadline will be suspended from non-academic campus activities. The students will remain enrolled at MIT and will be able to attend academic classes and labs. We will refer this interim action to the Ad Hoc Complaint Response Team, which includes the chair of the Committee on Discipline, for final adjudication.”⁹²

170. At this time, there is no indication that any actual disciplinary measures, let alone the measures set forth in applicable MIT policies, were taken against the students who violated MIT’s policies. In any event, the measures taken by MIT (and not taken by MIT) have been insufficient to deter the ongoing discrimination and harassment of Jewish and Israeli students on MIT’s campus.⁹³

171. Undeterred by MIT’s (empty) threats, MIT CAA co-sponsored another rally at MIT, which blocked entrances to campus buildings, including (again) Lobby 7, as well as streets

⁹² Plaintiffs do not base their claims on a challenge of the Institute’s disciplinary decisions. However, Plaintiffs *do* take issue with the Institute’s failure to address and control antisemitism. Through the Institute’s failure to follow through on threatened consequences, antisemitic protesters were emboldened.

⁹³

[https://twitter.com/RetsefL/status/1722852140245254559?ref_src=twsrc%5Etfw%7Ctwcamp%5Etweetembed%7Ctwterm%5E1722852140245254559%7Ctwgr%5Ee9cb43c4af20bbae3b63778489707751471d37b2%7Ctwcon%5Es1 &ref_url=https%3A%2F%2Fwww.dailysignal.com%2F2023%2F12%2F14%2Frenowned-science-engineering-institute-loses-way-woke-leadership-imperiling-jewish-students%2F](https://twitter.com/RetsefL/status/1722852140245254559?ref_src=twsrc%5Etfw%7Ctwcamp%5Etweetembed%7Ctwterm%5E1722852140245254559%7Ctwgr%5Ee9cb43c4af20bbae3b63778489707751471d37b2%7Ctwcon%5Es1&ref_url=https%3A%2F%2Fwww.dailysignal.com%2F2023%2F12%2F14%2Frenowned-science-engineering-institute-loses-way-woke-leadership-imperiling-jewish-students%2F)

around campus. Once again, protestors called for violence against Jews, chanting, “There is only one solution: Intifada revolution,” a single phrase invoking notions of both Hitler’s so-called “Final Solution” (i.e. mass extermination) for Jews as well as rebellion against the only Jewish state.

172. One of the speakers at the protest went even further and gave a speech, which, among other things, told fellow protesters, “It is our duty to fight... history requires trouble... resistance is resistance...it is not enough to exist passively...not enough for us to come out and march...we have to shake history with our own two hands...when we free Palestine the whole damn world is coming with us...resistance requires sacrifice.” “Resistance” in the post-October7 context has consistently been understood, including by Plaintiffs and other members of the campus community, to include the acts of terrorism and violence perpetrated against Israelis. The use of “resistance” in this context has caused Jewish and Israeli students at MIT, including Plaintiffs and SCLJ Members, to feel unwelcome and unsafe on campus and at MIT-connected events.

173. Other leaders of MIT CAA also spoke at the rally and specifically stated that the MIT leadership had not deterred them from taking action: “Sally Kornbluth is new to MIT; she doesn’t know how we operate yet. We won’t back down... We stood up to one of the most powerful institutes in the world and got THEM to back down!”

e. MIT’s Leadership and Faculty, Individually and through University Offices, Not Only Failed to Protect Jewish Students, but Furthered the Aims of the Anti-Israel and Antisemitic Actions Being Taken against Jewish Students.

174. One postdoc⁹⁴ associate at MIT tweeted numerous times about his hatred for Zionists, even going as far as to call Zionism a “mental illness” and equating Jews with Nazis. He

⁹⁴ Postdocs are both students and employees of MIT. They receive a salary from the university.

also falsely claimed in a tweet that “Zionists not only steal our lands, food, and culture, but our dead bodies as well for organ harvesting.”



Afif Aqrabawi  @AjAqrabawi · 22h

...

Zionists not only steal our lands, food, and culture, but our dead bodies as well for organ harvesting.

I feel like I've seen this movie before.. sounds like some crazy horror film, no?

175. After this tweet was posted, concerned students contacted the MIT Diversity, Equity, Inclusion (“DEI”) office. The DEI office told the student in an email, “...I would be very cautious before accusing any one of our colleagues, staff, or trainees of hate speech. Can I gently suggest, in the same spirit of working against polarization, that if we believe (as I genuinely do) that it is wrong to accuse Israeli soldiers of harvesting organs, it may also be a little misleading and inflammatory to compare recirculating, in effect, an old and decontextualized but confirmed report, to accusing Jews of murdering Christian children for ritual purposes (‘blood libel’)?”

176. No part of the organ-harvesting blood libel is “confirmed.” According to the ADL, “The ‘blood libel’ refers to a centuries-old false allegation that Jews murder Christians – especially Christian children – to use their blood for ritual purposes, such as an ingredient in the baking of Passover matzah (unleavened bread). It is also sometimes called the ‘ritual murder charge.’ The blood libel dates back to the Middle Ages and has persisted despite Jewish denials and official repudiations by the Catholic Church and many secular authorities. Blood libels have frequently led to mob violence and pogroms and have occasionally led to the decimation of entire Jewish communities.”⁹⁵

⁹⁵ <https://www.adl.org/resources/backgrounder/blood-libel-false-incendiary-claim-against-jews>

177. On January 16, 2024, at an interfaith event called “Planetary Health: indigenous Land, People and Bodies,” MIT’s Interfaith Chaplain and Spiritual Advisor to the Indigenous Community at MIT diverted the conversation from the topic of the event on multiple occasions to proclaim that Palestinians are being “wrongfully subjugated and oppressed by white European colonizers” and made many similar comments.⁹⁶

178. A non-Jewish student wrote to MIT to express his concern about how Jews seemed targeted and likely felt unsafe at the MIT event and further expressed their own discomfort at how the chaplain had conducted herself at the event.

f. MIT’s President is Called to Testify Before Congress

179. On November 28, 2023, the U.S. House Committee on Education and the Workforce announced that it would hold a hearing, titled “Holding Campus Leaders Accountable and Confronting Antisemitism.”⁹⁷

180. “Over the past several weeks, we’ve seen countless examples of antisemitic demonstrations on college campuses. Meanwhile, college administrators have largely stood by, allowing horrific rhetoric to fester and grow,” said Chairwoman Virginia Foxx. She continued, “College and university presidents have a responsibility to foster and uphold a safe learning environment for their students and staff. Now is not a time for indecision or milquetoast statements. By holding this hearing, we are shining the spotlight on these campus leaders and demanding they take the appropriate action to stand strong against antisemitism.”⁹⁸

⁹⁶ The notion that all Jews are white is patently false. “Approximately 30% of Israeli Jews are Ashkenazi, or the descendants of European Jews.” See <https://www.latimes.com/opinion/op-ed/la-oe-mazzig-mizrahi-jews-israel-20190520-story.html>. However, those desiring to frame Jews as colonial occupiers often attempt to frame all Jews as “white.”

⁹⁷ <https://edworkforce.house.gov/news/documentsingle.aspx?DocumentID=409778>

⁹⁸ <https://edworkforce.house.gov/news/documentsingle.aspx?DocumentID=409778>

181. President Kornbluth appeared before Congress along with the presidents of the University of Pennsylvania and Harvard on Tuesday, December 5, 2023.

182. At the beginning of the hearing, MIT President Kornbluth gave a brief statement, wherein she affirmed, despite the occurrence of the events described above, that “the right to free speech does not extend to harassment, discrimination or incitement to violence in our community. MIT policies are clear on this. To keep the campus functioning, we also have policies to regulate the time, manner and place of demonstrations.”⁹⁹

183. As the hearings progressed, however, Dr. Kornbluth backtracked on this statement. During the course of the congressional hearings, President Kornbluth was asked if the conduct that had taken place toward Jewish students at MIT had violated MIT’s Code of Conduct:

ELISE STEFANIK: Dr. Kornbluth, does — at MIT, does calling for the genocide of Jews violate MITs code of conduct or rules regarding bullying and harassment, yes or no?

SALLY KORNBLUTH: If targeted at individuals, not making public statements.

ELISE STEFANIK: Yes or no, calling for the genocide of Jews does not constitute bullying and harassment?

SALLY KORNBLUTH: I have not heard calling for the genocide for Jews on our campus.

ELISE STEFANIK: But you’ve heard chants for intifada?

SALLY KORNBLUTH: I’ve heard chants, which can be anti-Semitic depending on the context when calling for the elimination of the Jewish people.

⁹⁹ <https://rollcall.com/2023/12/13/transcript-what-harvard-mit-and-penn-presidents-said-at-antisemitism-hearing/>

ELISE STEFANIK: So, those would not be according to the — MITs code of conduct or rules?

SALLY KORNBLUTH: That would be investigated as — as harassment, if pervasive and severe.¹⁰⁰

184. According to the U.S. Department of Education’s website, a Title VI investigation was opened relating to MIT on December 13, 2023.¹⁰¹

IX. MIT’s Response to the Harassment and Assault of Jewish Students on Campus Has Been Inadequate and Ineffective and Continues to Embolden Antisemitic Acts on Campus

185. Even after MIT had received two letters from DOE concerning antisemitism on campus, even after MIT had its president invited to testify before Congress, and even after a Title VI investigation was opened against MIT, the MIT administration continues to fail to appropriately address antisemitism on campus, and antisemitism on campus continues unabated.

186. In the November/December MIT Faculty Newsletter, Michel DeGraff, a Professor of Linguistics published a piece ironically called, “Standing Together Against Hate: From the River to the Sea, From Gaza to MIT.” The letter thanked MIT CAA and the MIT Coalition for Palestine, falsely accused Israel (once again) of bombing a hospital, and insinuated that anyone who disagreed with her did so based purely on race and not the substance of their opinions. This MIT professor signed letter with the same slogan as its title, “from the river to the sea, from Gaza to MIT....”¹⁰²

¹⁰⁰ <https://rollcall.com/2023/12/13/transcript-what-harvard-mit-and-penn-presidents-said-at-antisemitism-hearing/>

¹⁰¹ <https://www2.ed.gov/about/offices/list/ocr/sharedancestry-list.html>

¹⁰² <https://fnl.mit.edu/november-december-2023/standing-together-against-hate-from-the-river-to-the-sea-from-gaza-to-mit/>

187. On or around December 6, 2023, MIT CAA and the MIT Coalition for Palestine hosted an event with Miko Peled.¹⁰³ During the event, Peled encouraged his audience to go to MIT Hillel and confront MIT’s Jewish students there about Gaza. Peled also openly denied many of the atrocities of the October 7 attacks. And during the speech, Peled made a joke about not being able to say, “From the River to the Sea;” students laughed and some began chanting the phrase.

188. When students contacted MIT’s Institute Discrimination & Harassment Response Office (“IDHR”) concerning antisemitic events that occurred on campus, they were informed that the reported contact did not “seem to violate the policies that IDHR has jurisdiction over” and suggested that the student might be confused about the definition of harassment under MIT’s policies. One student, Plaintiff Meyer reported concerning antisemitism she and peers had experienced only to be told that Jewish students were not members of a protected class. This is not true. To the contrary, the MIT’s policy on harassment based on protected class expressly covers religious minorities, including Jews, and Title VI protects Jews on the basis of their shared ancestry.¹⁰⁴

189. In December 2023, the MIT Women and Gender Studies Department co-hosted an event with the MIT Coalition for Palestine and invited students to join its book club, wherein the group would be reading a book by Ahed Tamimi, who posted on X, “Come on settlers, we will slaughter you. We are waiting for you in all cities of the West Bank. What Hitler did to you was a joke. We will drink your blood and eat your skulls. We are waiting for you.”¹⁰⁵

¹⁰³ <https://www.youtube.com/watch?v=ABcW7GE3jrw>

¹⁰⁴ <https://www2.ed.gov/about/offices/list/ocr/docs/qa-titleix-anti-semitism-20210119.pdf>

¹⁰⁵ https://twitter.com/HillelNeuer/status/1721495003468632266?ref_src=twsrc%5Etfw%7Ctwcamp%5Etweetembed%7Ctwterm%5E1721495003468632266%7Ctwgr%5E1d094c0927506764fe9382acf0975ddf3d53b547%7Ctwcon%5Es1_&ref_url=https%3A%2F%2Funwatch.org%2Famnesty-international-poster-girl-ahed-tamimi-is-hitler-loving-antisemite%2F

190. Instead of condemning Tamimi’s invitations for more violence against Jews, the Program Manager for the MIT Women and Gender Studies Department invited students to sympathize with her. Events like these were and are extremely isolating to Jewish and Israeli students and make it clear that Jews and Israelis are not welcome—and possibly not physically safe—at these events or in these departments.

191. On December 14, 2023, MIT CAA and Palestine@MIT jointly posted on Instagram that they were undeterred, writing, “We will continue to be loud and be heard and not be deterred away from our fight for Palestine and our fight against MIT’s complicity with the occupation. When we return next semester, we will be even stronger and even bigger to make sure that there will be no business as usual at MIT until Palestine is free! From the river to the sea PS🇵🇸🇵🇸”

192. On January 22, 2024, the MIT Israel Alliance, of which at least one Plaintiff is a member, sent an email to MIT’s administration, expressing their concern that MIT had failed to deter any of the discriminatory and harassing behavior toward Jewish and Israeli students.

193. The letter pointed out that the events at MIT had made life so difficult for Jewish students that some had even relocated to or chosen to stay in Israel, an active war zone, rather than staying at MIT.

194. The letter further asked MIT to outline what measures it planned to take to ensure that students could attend MIT in an environment free from discrimination and harassment.

X. MIT’s Policies Concerning Harassment Have Been Unequally and Selectively Enforced Relating to Jewish Students as Compared to Other Minorities on Campus

195. MIT’s enforcement of its policies described in Section II of this Complaint were applied in an arbitrary and capricious manner as to Plaintiffs.

196. In failing to consistently apply its policies to protect Jewish students against hate speech and harassment and intimidation, MIT's actions constituted a substantial departure from academic norms and acceptable professional judgment.

197. MIT's selective enforcement of its policies predates 2023. By way of example, in 2021 MIT canceled the speech of a prestigious geophysicist, Doran Abbott who had been a vocal critic of certain aspects of affirmative action and diversity programs.¹⁰⁶ Even though Abbott said that the lecture he planned to give at MIT would not have contained any discussions about his views on affirmative action or diversity programs, MIT canceled his speech.

198. In defending the MIT's decision to cancel Mr. Abbott's lecture, Robert van der Hilst, the head of the department at MIT who canceled the lecture, stated, "**Besides freedom of speech, we have the freedom to pick the speaker who best fits our needs... Words matter and have consequences.**"¹⁰⁷

199. Following this event, MIT modified its policy on Freedom of Expression, affirming its commitment to freedom of expression on campus.¹⁰⁸ But importantly, the statement also contained critical language which, for the protection of students and their ability to pursue their education at MIT, limits that freedom:

MIT does not protect direct threats, harassment, plagiarism, or other speech that falls outside the boundaries of the First Amendment. **Moreover, the time, place, and manner of protected expression, including organized protests, may be restrained so as not to disrupt the essential activities of the Institute.**

At the intersection of the ideal of free expression and MIT community values lies the expectation of an affirming, respectful learning and working environment. We cannot prohibit speech that some experience as offensive or injurious. At the same

¹⁰⁶ <https://www.nytimes.com/2021/10/20/us/dorian-abbot-mit.html>

¹⁰⁷ <https://www.nytimes.com/2021/10/20/us/dorian-abbot-mit.html>

¹⁰⁸ https://facultygovernance.mit.edu/sites/default/files/reports/2022-09_Proposed_MIT_Statement_on_Freedom_of_Expression_and_Academic_Freedom.pdf

time, MIT deeply values civility, mutual respect, and uninhibited, wide-open debate. Controversies over free expression are opportunities for learning rather than occasions for disciplinary action. This applies broadly. For example, when MIT leaders speak on matters of public interest, whether in their own voice or in the name of MIT, this should always be understood as being open to debate by the broader MIT community.

A commitment to free expression includes hearing and hosting speakers, including those whose views or opinions may not be shared by many members of the MIT community and may be harmful to some. **This commitment includes the freedom to criticize and peacefully protest speakers to whom one may object, but it does not extend to suppressing or restricting such speakers from expressing their views.** Debate and deliberation of controversial ideas are hallmarks of the Institute's educational and research missions and are essential to the pursuit of truth, knowledge, equity, and justice.¹⁰⁹

200. Although MIT modified its expression policy, MIT still retained the ability to impose restrictions on speech on its campus. Moreover, MIT maintained the provisions in its handbook which banned discriminatory and harassing behavior.

201. MIT has the tools both under the law and through its own policies to stop the harassment of and discrimination against Jewish and Israeli students, but MIT has failed to use its authority to do this.

202. In addition to its failures to take action as set forth above, MIT has, in contravention of its policies, selectively enforced its flag policies against Jewish and Israeli students, including Plaintiffs and SCLJ members. By way of example, a Belgian flag has been hanging from an office for approximately three years. However, MIT administrators required students flying Israeli flags to remove them and even threatened to send facilities staff over to remove flags if students would not do it themselves.

¹⁰⁹ https://facultygovernance.mit.edu/sites/default/files/reports/2022-09_Proposed_MIT_Statement_on_Freedom_of_Expression_and_Academic_Freedom.pdf (emphasis added).

203. Specifically, Plaintiff Boukin and another Jewish doctoral student displayed Israeli flags on MIT's campus. One Jewish student also displayed a banner stating "No excuse for terror." Following the October 7 terrorist attacks in Israel, these students were required to remove their flags and banners. At the same time such flag requirements were *not* applied to students or faculty flying Palestinian flags.

204. MIT administrators have allowed Palestinian flags to remain on campus, while Jewish and Israeli students have been asked and/or forced to remove their Israeli flags:



205. On November 8, 2023, MIT announced that large banners and flags were no longer permitted to be displayed. Further, the announcement stated that it is impermissible to disrupt living, working, and learning spaces at MIT.¹¹⁰ These new policies were wholly inadequate to address the hostile antisemitic campus environment because MIT refused to

¹¹⁰ <https://orgchart.mit.edu/letters/campus-safety-and-policies-around-protests-postering-and-free-expression>

actually enforce these new policies against students, including MIT CAA, who engaged in antisemitic harassment or protests. As a result, the announcement of these new policies did nothing to deter MIT CAA and protesters from continuing to disrupt the educational experience of Jewish and Israeli students on campus.

206. Near the end of the Fall term, President Kornbluth reached out to a group of faculty to serve as advisors on a committee aimed at structuring communication and conversations surrounding antisemitism on campus. Unfortunately, the Jewish and Israeli faculty members who were asked to serve on the committee did not feel that the communications were successful and subsequently resigned because they felt that the group was doing nothing to address antisemitism on campus.

207. On February 12, 2024, MIT CAA, assisted by MIT faculty and staff members, held yet another unauthorized protest in Lobby 7, where students once again, in contravention of MIT policies, unfurled large flags, took over the lobby of the building, and chanted “From the River to the Sea, Palestine will be free!” This protest violated MIT’s time place and manner restrictions, its rule that protests must be registered at least three days in advance, its policy that protests should not be disruptive, and MIT’s policy on flags.¹¹¹

208. Unfortunately, even this failed to serve as a deterrent, and in response to ongoing antisemitism on campus, on February 26, 2024, a group of faculty members published a 32-page report, detailing several antisemitic events on MIT’s campus, which is attached as Exhibit A to this Complaint.

¹¹¹ <https://twitter.com/StopAntisemites/status/1757404628591739027>

XI. MIT's Failure to Enforce its Anti-Discrimination Policies and Keep its Promises to Protect its Students Affects All Students

209. MIT's failure to enforce and/or selective enforcement of its own anti-discrimination and anti-harassment policies does not just impact Jewish and Israeli students.

210. Rather, by allowing antisemitism to flourish on campus, MIT has created a hostile environment where incidents of violence and harassment are prevalent. MIT has thus rendered the campus unsafe for all students and disrupted the ability of all students to learn and participate in campus activities and programs in the ways they were promised when they enrolled at MIT.

211. Moreover, non-Jewish students can and have been targeted for violence and harassment based on the assumption that they are Jewish. A survey conducted across several universities by the ADL concluded: "Slightly less than one in five (18.8%) non-Jewish students reported having personally experienced an antisemitic incident. Of the non-Jewish students erroneously assumed to be Jewish, nearly half (47%) stated that they had been targeted based on their assumed Jewishness."

212. And to repeat, the impact of antisemitism on campus is not limited to those directly targeted by antisemitic harassment or violence. As the ADL found: "The consequences of antisemitic victimization on campus were widespread for both Jewish and non-Jewish students. Jewish and non-Jewish students alike reported suffering serious negative effects as a result of experiencing/witnessing incidents, highlighting the damaging effects of campus antisemitism on overall health and the social, academic, and professional lives of student victims."

213. Accordingly, all of MIT's students, both Jewish and non-Jewish (Israeli and non-Israeli), are victims of MIT's failure to uphold its policies and curb hateful antisemitic (and antizionist) rhetoric.

XII. Plaintiffs' Damages

214. Plaintiffs and the SCLJ Members are, or were at all relevant times, enrolled as students at MIT, and are, or were, damaged, *inter alia*, by the loss of the college experience for which they were obligated to pay, as well as the harm they endured, and the damages incurred as the result of the necessary actions taken by them in order to avoid the harmful environment created by MIT, including its culpable inaction.

215. Plaintiffs and SCLJ Members all personally experienced pervasive and objectively offensive harassment by school peers, faculty members, staff members, and/or administration at MIT on the basis of their Jewish and/or Israeli identities consisting of antisemitic harassment, prejudice, and abuse which deprived Plaintiffs and SCLJ Members of educational opportunities or benefits, including but not limited to the use of school facilities and academic buildings, participation in student groups, full participation in academic offerings such as study groups or in-person classes. Plaintiffs also did not receive the benefit of equal application of MIT policies, in that MIT chose not to enforce nondiscrimination and harassment policies to protect Jewish students and selectively enforced other policies against Jewish and Israeli students but not against other students.

216. All Plaintiffs and SCLJ Members have MIT-issued email addresses and participated in various MIT student groups. Following the October 7 terrorist attacks, MIT student groups, including but not limited to MIT CAA and Palestine@MIT, used the MIT email system to send mass emails to all MIT students who were members of student groups.¹¹² These emails

¹¹²MIT provides all student groups, regardless of funding status, with the privilege of using MIT's name as well as the ability to use MIT's email system to communicate with the entire MIT community at their official MIT email addresses. See <https://asa.mit.edu/group-privileges/compare-privileges>

included antisemitic and anti-Israel rhetoric which, among other things, challenged core elements of Plaintiffs' and SCLJ Members' identities. MIT and its administration knew or should have known, not only that the emails existed and were widely distributed throughout the MIT student body, including to Plaintiffs and SCLJ Members, but also that such content violated MIT's nondiscrimination and harassment policies. MIT's decision to allow its email system to be used to facilitate these communications, which were sent to Plaintiffs and SCLJ Members, in addition to the wider MIT community, was clearly unreasonable.

217. MIT students and MIT student groups engaged in rallies and protests on MIT's campus in which antisemitic and anti-Israel rhetoric was used and calls for violence against Jewish people, Israelis, or the state of Israel were made. These events were held in common areas on MIT's campus in which Plaintiffs and SCLJ Members often had to pass through in order to attend class or student activities, and, in doing so, were subjected to antisemitic rhetoric and calls for violence or, alternatively, prevented from passing through spaces by protesters. MIT had actual knowledge of these protests and rallies, but did not take action to enforce time, place, and manner restrictions to ensure that students could comfortably and safely attend class without being subjected to hateful language, assaults, or calls for violence. Nor in most of these instances did MIT discipline students for MIT organizations for the MIT policy violations related to these protests. These deliberate decisions on the part of MIT and its administration are clearly unreasonable and evince deliberate indifference to the experiences of Jewish and Israeli students at MIT confronted with antisemitism. All Plaintiffs and SCLJ Members were subjected to antisemitic rhetoric at protests and rallies on MIT's campus.

218. Plaintiff Meyer met with IDHR regarding antisemitism she experienced at MIT before and after October 7, 2023. After the October 7, 2023, Plaintiff Meyer was the recipient of

antisemitic comments by other students on campus and contacted the IDHR again. She was falsely told that she was not a member of a protected class and, subsequently, that what she experienced is not within the scope of the IDHR. MIT and its administration knew or should have known that Jewish and Israeli students are members of a protected class under both MIT policies and Title VI of the Civil Rights Act.

219. Plaintiff Boukin was subjected to antisemitic chants and violent speech at the MIT Lobby 7 protest and was prohibited from freely moving through the space. Plaintiff Boukin was similarly subjected to hateful and antisemitic rhetoric during various other protests and rallies on MIT's campus since the October 7, 2023 terrorist attacks. At one point, Plaintiff Boukin and other students were surrounded by MIT CAA members and other students shouting "from the river to the sea.," which Plaintiff Boukin understood to be calling for the elimination of Israel. For Plaintiff Boukin, this was reminiscent of other periods in history, including Kristallnacht. Plaintiff Boukin was the recipient of emails on her official MIT-issued email address from student groups that contained antisemitic language.

220. SCLJ Member #1 received antisemitic emails on his MIT-issued email address from various student groups at MIT, including but not limited to MIT CAA and Palestine@MIT. SCLJ Member #1 was also subjected to antisemitic rhetoric in various common spaces on MIT's campus, which were the sites of rallies or protests, including unsanctioned ones, and which involved antisemitic and sometimes violent language to describe Jewish or Israeli people.

221. Other Jewish and Israeli students at MIT have had similar experiences. Another Jewish student personally witnessed calls for violence against Jewish people and Israelis on MIT's campus and in particular at an MIT CAA protest in Lobby 7, which this Jewish student had to pass through in order to attend class. Subsequently, this student stopped attending classes in-person and

delayed taking their qualifying examinations until a later date. This Jewish student is a participant in various student groups on MIT's campus, but the other participants in these student groups have endorsed antisemitic and anti-Israel views such that that Jewish student no longer feels welcome. Another Jewish student felt unwelcome to the point of needing to leave her qualifying exam study group after group members told her that the victims of the October 7, 2023 Nova music festival massacre in Israel deserved to die and was forced to remove an Israeli flag and a banner that stated "No excuse for terror" while non-Israeli flags and banners remained up around campus. Multiple Jewish and Israeli students reported the antisemitic harassment they experienced to MIT's administration.

CLAIMS FOR RELIEF

Count One **(Title VI of the Civil Rights Act of 1964)**

222. Plaintiffs and SCLJ Members repeat and reallege the allegations of the preceding paragraphs as though fully stated herein.

223. MIT receives financial assistance from DOE and is therefore subject to suit under Title VI of the Civil Rights Act of 1964.

224. Discrimination against Jews—including based on actual and/or perceived identity of being Jewish, including as having a shared ancestry, race, ethnic characteristics, and/or national origin—is prohibited under Title VI, including in the written policies of OCR.

225. The Plaintiffs in this Count One, or their members, identify as Jewish or Israeli, and their status and identification as being Jewish or Israeli brings them within the scope of Title VI's protections.

226. The acts and omissions of MIT and its administrators have subjected the Plaintiffs in this Count One, or their members, to discrimination on the basis of their actual and/or perceived identity as being Jewish and/or Israeli, including as having a shared ancestry, race, ethnic characteristics, and/or national origin.

227. MIT and its administrators had actual notice that discrimination and harassment, over which MIT had substantial control and the authority to remediate, was so severe, pervasive, and objectively offensive that it created a hostile environment based on actual and/or perceived identity of being Jewish and/or Israeli that deprived the Plaintiffs in this Count One, or their members, of full access to MIT's educational programs, activities, and opportunities.

228. MIT and its administrators have intentionally discriminated against the Plaintiffs in this Count One, or their members, because of their actual and/or perceived identity of being Jewish and/or Israeli, as exhibited by MIT's deliberate indifference to the antisemitic abuse, harassment, and intimidation of such Plaintiffs, or their members, in violation of Title VI. Specifically, MIT and its administrators' response to the antisemitic abuse, harassment, and intimidation of Plaintiffs, or their members, was clearly unreasonable in that they failed to cure or otherwise adequately, appropriately, and meaningfully address, ameliorate, or remedy the discrimination against such Plaintiffs, , or their members, and the hostile environment that Jewish and/or Israeli students, including such Plaintiffs, , or their members, are forced to endure at MIT because of their actual and/or perceived identity of being Jewish and/or Israeli. Further, MIT has failed to take effective steps reasonably calculated to end the harassment, eliminate any hostile environment, and prevent the harassment from recurring. Such unlawful deliberate indifference caused the Plaintiffs in this Count One, or their members, to be subjected to a hostile educational environment.

229. The environment at MIT, which has been rendered hostile for the Plaintiffs in this Count One, or their members, as a result of their actual and/or perceived identity as being Jewish and/or Israeli, is sufficiently severe, pervasive, persistent, and offensive such that it has deprived such Plaintiffs, or their members, of equal access to the educational opportunities and benefits that MIT provides to non-Jewish or non-Israeli students.

230. MIT and its administrators have actively and intentionally engaged in this pattern of severe and/or pervasive discrimination.

231. MIT and its administrators also directly and intentionally discriminated against the Plaintiffs in this Count One, or their members, with such Plaintiffs', or their members', actual and/or perceived identity being a substantial or motivating factor in MIT's actions, including inaction.

232. MIT has failed to act or has acted with leniency and/or delay in applying its policies when a known or reported incident involved antisemitism or where actual and/or perceived Jewish students, including the Plaintiffs in this Count One, or their members, were involved. As detailed above, MIT's actions and conduct were, and continue to be, intended to treat students such as the Plaintiffs in this Count One, or their members, differently as compared to dealing with incidents involving other, similarly situated students who are not actually or perceived to be Jewish and/or Israeli.

233. MIT's violations of Title VI were the actual, direct and proximate causes of the injuries of the Plaintiffs in this Count One, or their members.

234. As a result of the foregoing, the Plaintiffs in this Count One, or their members, have suffered, and continue to suffer, substantial damages in an amount to be determined at trial.

235. The Plaintiffs in this Count One, or their members, are also entitled to appropriate injunctive relief under Title VI, as MIT had knowledge of, and has been and continues to be deliberately indifferent to, a discriminatory and hostile environment that is severe, persistent, and pervasive.

236. The Plaintiffs in this Count One are entitled to attorneys' fees and costs pursuant to 42 U.S.C. § 1988.

JURY TRIAL DEMANDED

Plaintiffs hereby demand a trial by jury for all issues so triable.

PRAYER FOR RELIEF

WHEREFORE Plaintiffs pray and request that a judgment be entered in each of their favor and against Defendant, as follows:

1. Injunctive relief enjoining Defendant and its agents from establishing, implementing, instituting, maintaining, or executing policies, practices, or protocols that penalize or discriminate against Jewish students, including Plaintiffs, or their members, in any way and ordering Defendant to take all necessary and appropriate remedial and preventative measures including, but not limited to: (i) terminating administrators, professors, or other university employees or staff responsible for the antisemitic abuse permeating the school, whether because they engaged in it or permitted it, and (ii) suspending or expelling students and/or student groups who engage in such conduct;
2. An injunction preliminarily and permanently requiring Defendant to enforce its policies cited in Section II of this Complaint on an evenhanded basis, ensuring that Jewish members

of the MIT community are protected, with respect to their physical safety and otherwise, from discrimination and harassment on the basis of their Jewish identity, including those for whom Zionism is an integral part of that identity.

3. An injunction preliminarily and permanently enjoining Defendant from (i) permitting registered student organizations from discriminating against and/or harassing Jews; (ii) funding any student organization that discriminates against or harasses Jews; and (iii) granting official recognition or funding to any student organization that discriminates against and/or harasses Jews;
4. An injunction preliminarily and permanently mandating that Defendant take action to end the hostile environment on campus by (i) communicating to the entire MIT community by broadcast email or a similar medium, that MIT will condemn, investigate, and punish any conduct that harasses members of the Jewish community, or others on the basis of their ethnic or ancestral background; (ii) providing education about antisemitism, including by conducting mandatory training for administrators and professors; (iii) instituting strict review and approval policies to ensure that the administration does not conduct, or finance, programs that will result in the harassment of or discrimination against Jewish students of the MIT community, including those for whom Zionism is an integral part of their identity;
5. Compensatory and punitive damages in amounts to be determined at trial;
6. Reasonable attorneys' fees, the costs of suit, and expenses;
7. Pre-judgment interest and post-judgment interest and the maximum allowable rate permitted by law; and
8. Any such further relief as the Court deems just and proper.

Dated: March 7, 2024

Respectfully submitted,



/s/ David Abrams

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EXHIBIT

A

Detailed description of key events affecting the Jewish and Israeli Community at MIT

February 26, 2024

This report documents the rise of antisemitism at MIT in the year that lead up to the October 7 attack, and the eruption of hostilities towards Jews and Israelis that ensued. The data collection and recording was a collaborative effort among faculty, students, and staff, representing a broad cross-section of the affected community.

This is not a fully comprehensive report. Events have been anonymized where possible. However, several reports have been omitted to protect the identities of individuals within this small community. For this same reason, witness accounts have only been selectively included.

We hope that in reading this document you can obtain an inside view into the experience of Jewish and Israeli members of the MIT campus. We further acknowledge that other communities at MIT are also affected by the current situation on campus. The Jewish and Israeli community, as a whole, stands in solidarity with anyone experiencing personal pain and trauma. This report is not meant to diminish the experiences of others.

While we are living through a national crisis, affecting many academic institutions, MIT has a unique social fabric, and our experiences here have not mirrored those in other institutions. To preserve this fabric and refocus the institute to its core mission, MITs faculty and its leadership must work together. We hope that this report is a first step in helping the broad MIT community to understand the challenges persisting on our campus, in order for us all to be able to heal MIT together.

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Sources corresponding to information detailed below are available [here](#).

October 22nd, 2022: CAA, CIS, Anthropology and WGS Co-Host Mohammed El-Kurd

MIT's Center for International Studies (CIS), Department of Anthropology, Women's & Gender Studies (WGS) department, and the CAA, [co-hosted](#) Mohammed El-Kurd. According to the Anti-Defamation League (ADL) – the leading anti-hate organization in the world whose mission is “to stop the defamation of the Jewish people and to secure justice and fair treatment to all” – El-Kurd “has accused Israelis of eating the organs of Palestinians and of having a particular lust for Palestinian blood. He has compared Israelis to Nazis, negated the historic Jewish connection to the Land of Israel, and vilified Zionism and Zionists.”

Concerned students contacted both the CAA and MIT WGS about Mr. El-Kurd's history of spreading racist conspiracy theories about Jews, yet the event continued as planned. Consequently, Mr. El-Kurd proceeded to make numerous fallacious and defamatory allegations at the MIT event, asserting that students at MIT who served in the IDF had tied up and gassed Palestinian children. He even said, “I hope every one of them [IDF veterans] dies in the most torturous and slow ways,” although Israel holds a mandatory draft law (similar to many European countries). In so doing, El-Kurd used his platform as an invited guest to humiliate and incite hatred against specific students – Israeli students – without evidence, and express support for violence against them on our campus.

This explicitly violates MIT harassment policy. In her congressional testimony, President Konbluth testified that, according to MIT policy, if calling for the genocide of Jews is “targeted at individuals” it can be considered harassment. Mr. El-Kurd's incitement was unmistakably targeted at specific individuals. He didn't have to reveal their identities in public or provide proof for his slanderous statements; to Mohammed El-Kurd, violence against Israelis is noble.

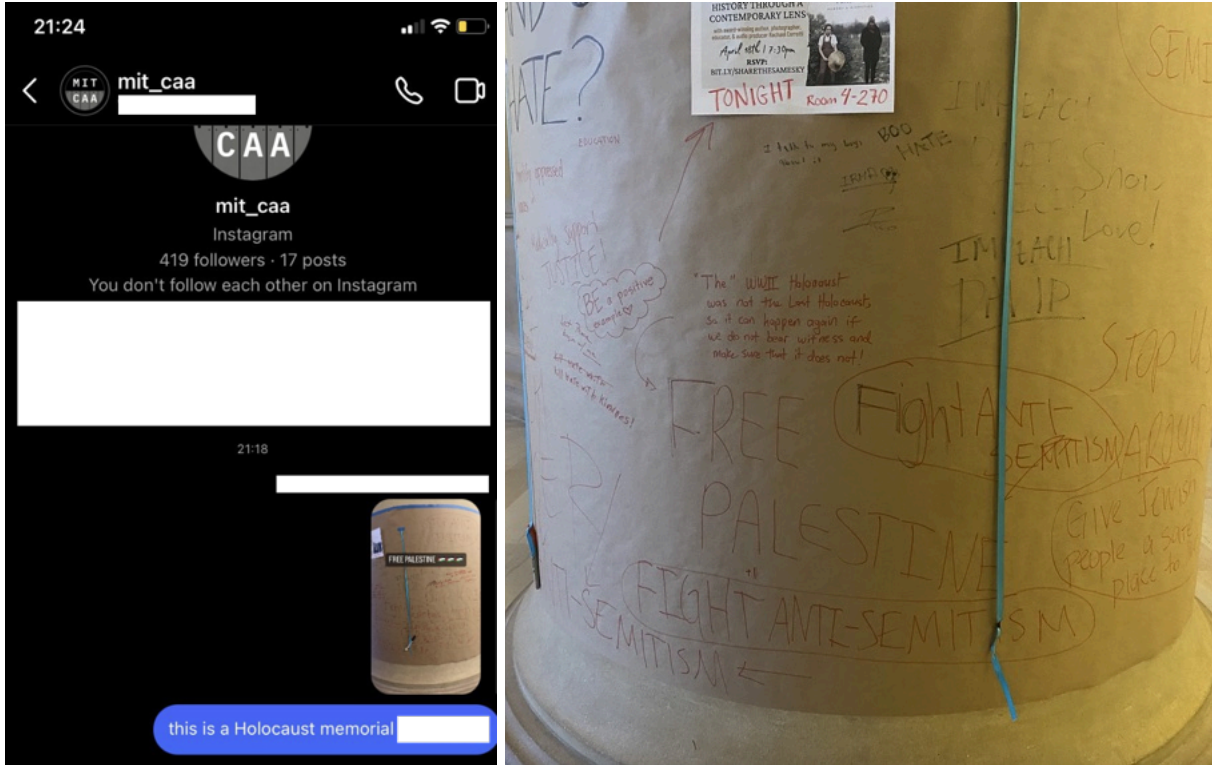
We emphasize that while we defend our commitment to free speech on campus, including those whose ideas we may find abhorrent, there must be a clear standard to disqualify the invitation of speakers who promote harassment and advocate for violence against members of our community, either personally or as an ethno-religious group.

An [article](#) published in The Tech raised a flag about this event and the future issues it will bring to campus.

April 18th, 2023: Defacing Jewish Holocaust Commemoration Display

A display commemorating the Jewish Holocaust in Lobby 7 was marked with “Free Palestine” slogans on Holocaust Remembrance Day. While the perpetrator of this act is unknown, the CAA proudly promoted this action through their Instagram account.

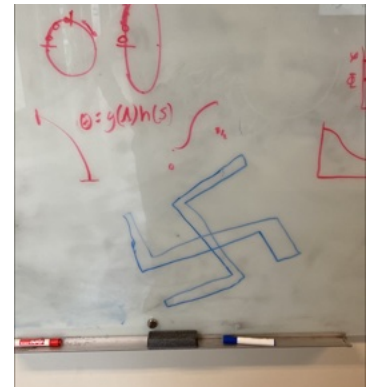
Note: All “Stop antisemitism” and “Fight antisemitism” markings in the picture below were added after the “Free Palestine” marking and possibly in response to it.



April 30th, 2023: Nazi Swastika Drawing on a Jewish Faculty Board

The notorious Nazi symbol was drawn on a board belonging to the research group of a Jewish faculty member, between two students’ offices. The PI’s name is listed on the doors and is identifiably Jewish.

While MIT police were contacted and a complaint was filed with them, the Jewish faculty member has not yet received an update nor indication of follow-up actions.



October 8th, 2023: CAA Justifies Hamas’s Oct 7th Massacre

Statements providing unequivocal support, justification, and glorification of the massacre of unarmed civilians committed by Hamas in Israel on October 7th were sent to the MIT student body and publicized on associated social media platforms. Specifically, the CAA sent out an email to all MIT undergrad dorms, put out a statement with the Palestine@MIT group, and posted it on their social media accounts (Instagram, and X/Twitter) starting on October 7th and the days immediately following. This was done when the gruesome extent of the massacre was

already clear, yet well before any Israeli military response occurred and any innocent Gazans had yet been caught in harm's way.

These statements included (see examples below) "Victory is ours," "...affirming the right of all occupied peoples to resist," "this resistance is 100% predictable and justified," "Palestinians cannot invade Palestine," etc. The fact that this letter was published on October 7 and explicitly references violence in the context of affirming a right to resistance makes it indisputably clear that the letter aimed to provide support and justification for the October 7 massacre and the taking of hostages. One of their posts on "the resistance rises" was signed by the "Samidoun" organization, a [known affiliate](#) for the recognized terror organization "Liberation of Palestine".

Additionally, the CAA called for supporters to attend the Cambridge rally that took place on Oct 9th that declared 'victory' in celebration of these heinous attacks. [This was their joint statement](#) sent via email to the MIT community.

Selected Examples:

To the MIT community,

In light of recent events in Palestine, the MIT Coalition Against Apartheid and Palestine@MIT denounces the settler colonial occupation by Israel, which is the root of the current situation. Colonization itself is inherently violent; we thus affirm the right of occupied peoples to resist their oppressors and stand in solidarity with the Palestinian people. For more information, [please view the full statement here](#).

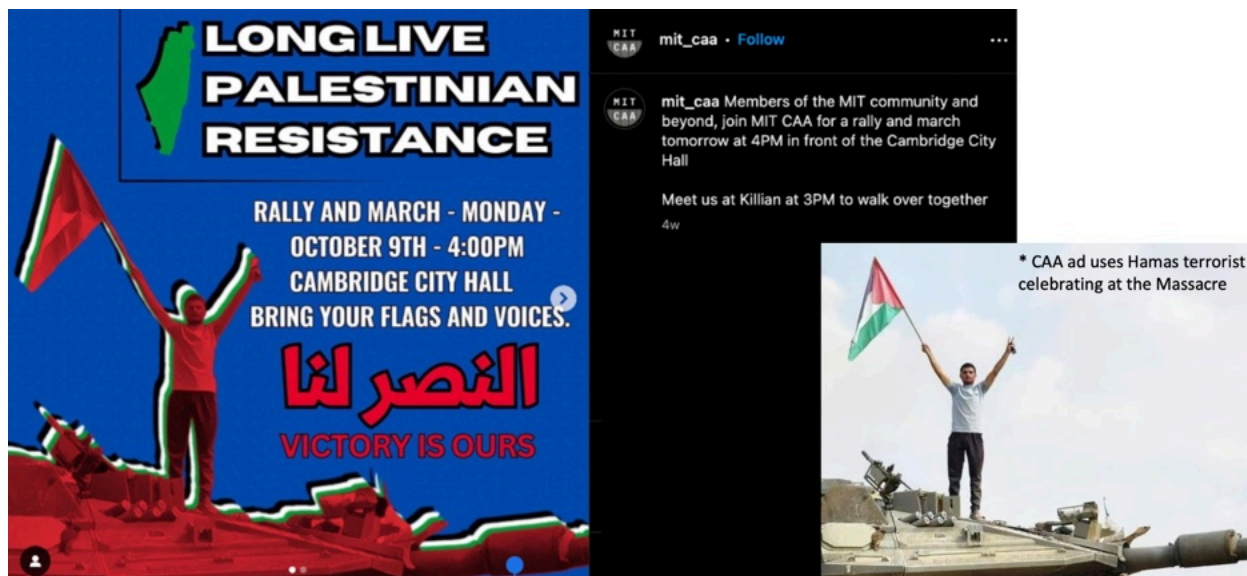
If your organization would like to sign on, fill out this form: <https://tinyurl.com/mit-pal-23>

Additionally, there will be a rally at Cambridge City Hall tomorrow (10/9) at 4PM. If you would like to join the MIT group, meet at Killian Court at 3PM to walk over together.

Until liberation,
MIT Coalition Against Apartheid
Palestine@MIT

CAA posts on, and soon after, Oct. 7:





October 10th, 2023: Chalking on MIT property

Students chalked "Free Palestine", "Resist the Oppression", and more anti-Israel slogans on the steps of Lobby 7 and elsewhere on campus. ("From Hamas" statements were added by other students in response). Again, these slogans on social media were posted right after the October 7th massacre, not before, thereby unambiguously sending a message that the massacre was in their minds a justified form of resistance.



October 17th, 2023: Misinformation Spread

Following a news story that Israel had deliberately attacked a large hospital in Gaza killing 500 people, which later was retracted as erroneous, an email was sent out by the CAA and affiliated organizations repeating the false claim that Israel was to blame. This was sent to the entire MIT undergraduate student body, despite rebuffing by the [U.S. Senate Intelligence Committee](#), the [Wall Street Journal](#), and others. The CAA has not, to this date, retracted their irresponsible statement, nor did they seek contrition for spreading such falsehoods on campus. Instead, one

Jewish student who responded in an attempt to set the record straight was subsequently accused of “denying an active genocide.”

Mistakes may be excused if the perpetrator expresses contrition. However, this claim was deliberately sent to the entire MIT undergraduate class (over 4,500 students) with no accountability for its impact.

Sent: Tuesday, October 17, 2023 11:35 PM
 To: ml-caa-exec <ml-caa-exec@mit.edu>
 Subject: Emergency Rally to Stop Genocide! Thursday @ 5PM outside Stud

TL;DR: Stop the Genocide: Emergency Rally for Palestine on Thursday 10/19 @ 5PM outside the stud

Earlier today, Israel dropped bombs on the al-Ahli Arab Hospital where thousands of Palestinians displaced by the current genocide were seeking shelter and care. Over 500 people and counting were massacred. At a hospital. Over 3000 Palestinians in Gaza have been killed by Israeli forces, with over 12,500 injured and over 1 million facing death as food, water, and fuel run out under the brutal Israeli blockade and the never-ending airstrikes.

There is an active genocide happening right now, and it is unconscionable not to act.

When the Israeli occupation controls the movement, the food, the water, the medicine, and the electricity of 2.2 million Palestinians in Gaza, when they drop over 6000 bombs in 6 days on a population with nowhere to go, when the only options given are to flee your homeland or to face death, and then when you choose to flee, they bomb you on your way out—choosing death for you—then it is not a war. **It is a genocide, and one that did not just start this past week.**

As students at MIT which proudly boasts Israeli President Benjamin Netanyahu as an alum, as residents of the US which is actively bankrolling billions for this genocide, and as humans, we cannot remain silent.

Join us and several other student organizations for a **rally to demand an end to this genocide** and for the liberation of Palestine from Israeli occupation and colonization. Share this as widely as you can.

We need the strength of millions around the world to fight for justice, and that includes all of you. Everyone should be there. The time is now.

When: Thursday, 10/19 @ 5PM
Where: Outside the Student Center

Free Palestine,
 MIT Coalition Against Apartheid
 Palestine @ MIT
 MIT Black Students Union
 MIT Black Graduate Students Association
 MIT Asian American Initiative
 MIT Divest
 MIT Reading for Revolution
 MIT Student Worker Alliance
 Party for Socialism and Liberation

*Evidence that the damage was caused by a mid-flight failure of an Islamic Jihad rocket: [NYT](#), [WSJ](#), [CNN](#), [NPR](#). Additionally, [The Senate Intelligence Committee](#), as well as [President Joe Biden](#), have confirmed this investigation.

October 19th, 2023: Incitement and harassment calls at a CAA Rally

A CAA rally, held outside the Student Center, included chants of “One Solution: Intifada Revolution” and “From the river to the sea, Palestine will be free.” Some protesters directly harassed Israeli students who were filming the protest quietly and unobtrusively from the side. One protester held their bicycle up as if to threaten an Israeli student, before getting very close to her and saying “Your ancestors [referring to Holocaust victims] didn’t die to kill more people.”

Slogans such as “Intifada revolution” and “From the river” are typically assigned explanations that place them in a non-harassing context, while for Israelis, and many Jews, they have far darker meanings. In the past, the Arabic word Intifada (“shaking off”) had non-violent connotations, and “Free Palestine” usually referred to Palestinian self-determination. Yet “Intifada” was the name Palestinians gave to two increasingly violent periods in recent history that provoked a campaign of suicide bombings that terrorized Israel in the early 2000s. Moreover, the slogan “from the river to the sea” originated in Arabic during the foundation of the State of Israel to denote that the partition of Israel into Jewish and Arab states was invalid and that “from the river to the sea, Palestine will be Arab (or Islamic)” (cf. [this Wikipedia article](#)). So, once again, context matters: with these phrases being used in the aftermath of a massacre of Jews, it is obvious for Jewish listeners to hear the threatening interpretations of these phrases.

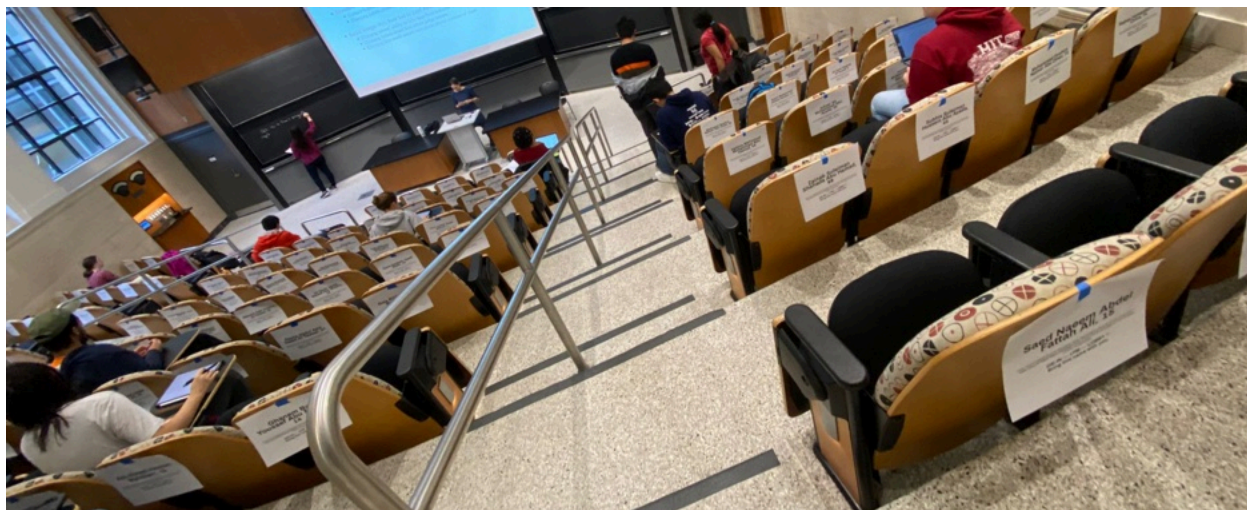
Members of our community, especially ones of Israeli descent, experienced the violence of the intifadas and rejected any notion that the term means anything other than violence against Israelis. For members of the MIT community to *fail* to take this into account despite our many attempts to decry the use of such language, when the same ideas regarding Palestinian self-determination and freedom can be communicated with different terminology, is to fail the MIT policy of “respect for the rights, differences, and dignity of others.” Ignorance of the connotations of these terms cannot be an excuse, especially when used repeatedly over the course of several months.

October 23, 2023: CAA Interrupts Classes to Spread its Propaganda

The MIT CAA staged a ‘classroom walkout’ at 11:30 AM, i.e. during class time. MIT instructed lecturers to: “exercise flexibility, where you can, for any students who wish to engage in limited protests about matters that are important to them. Students who wish to participate should do so in a way that respects the need of others to continue their instruction in the class.”

Despite the clear instruction to allow the general student body to continue their studies, some lecturers chose to end their class at 11:30 to support this action, which clearly failed to respect the need of others to continue their instruction in the class. The walkout also violated the MIT time and manner procedures for protests. More troublesome, some lecturers who wanted to continue their educational mission were disrupted by chants of “Free Palestine” from those who left. See [here](#) for 3.091, Introduction to Solid-State Chemistry, and [here](#) for 18.06, Linear Algebra, among others.

Additional violations of MIT policies, include placing posters on all lecture halls seats to advertise the walkout.



October 30, 2023: CAA “Die In” in Lobby 7 (Banned Protest Space)

The CAA publicly advertised and then ran a “die-in.” They posed inside Lobby 7 and disrupted foot traffic, despite rules prohibiting such indoor demonstrations.

This was the first of several deliberate protest acts to disrupt normal conduct and movement through the main entrance of MIT. We emphasize that this is certainly not an antisemitic event, and at the same time, it is a violation of MIT rules which we did not enforce and thereby ‘opened the door’ to the more severe and antisemitic violations reported below.



November 2nd, 2023: CAA Disorderly Behavior at MISTI and the President’s office, Harassing Staff and threatening Faculty

After launching a campaign against the MISTI-Israel Lockheed Martin Trust Fund, the CAA protested at the MISTI (MIT International Science and Technology Initiatives) offices, harassing MISTI staff. To quote a faculty member present at the event:

“They insistently rattled the door handles of offices that were closed with staff inside; and they congregated outside of and entered the office that facilitates MISTI’s programming in the Middle East, and at least one other office. Their chants included: ‘From the river to the sea...’, ‘MISTI, MISTI, you can’t hide,’ and cries associating MISTI with genocide”

After the incident, many staff reported feeling alarmed, intimidated, and afraid during the protest. Some staff members said they felt trapped in their offices, anxious about the prospect of verbal and physical assault. Rattling door handles is not necessary to convey speech; it is a precursor to physical violence.

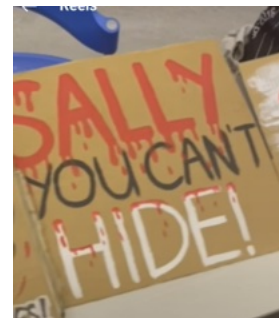
The students later protested outside the office of the faculty director of MIT-Israel MISTI program, linking his name specifically with their claimed ongoing genocide. The faculty member felt threatened and did not return to campus for several weeks, due to personal safety concerns.

Last, the students also forcefully stormed into MIT President Sally Kornbluth's office, who wasn't present at the time. A police officer was subsequently placed outside the President’s office, indicating a real concern for her safety and that of her staff following this event.

November 8th, 2023: Posted “Sally You Can’t Hide” on Social Media

A video was posted on the CAA's Instagram account showing a poster with President Sally Kornbluth’s name with painted blood. This poster, which some students report seeing as posting

an implicit threat of violence due to the use of ‘blood font’, was later publicly used at the CAA’s illegal blockade on Lobby 7. Explicit references to a specific Jewish Professor involved with the MISTI-Israel program were also listed on posters, requiring that they “end the fund” (terminate an educational program). In the context of the forthcoming blockade, many perceived this as an act of threat and intimidation.



November 8th, 2023: Faculty Letter, Rules Clarification and DSL Meeting

Following the MISTI protest and harassment of MIT employees, and in anticipation of the Lobby-7 blockade, over 100 faculty signed an urgent letter to the administration asking them to enforce the MIT rules moving forward. On the same day, the Division of Student Life (DSL) sent a [letter](#) to all students clarifying the rules for campus protests and announcing procedures for accelerated action on reports of harassment and discrimination, including use of [interim disciplinary action](#). Later that day, the CAA announced they would continue with the Lobby-7 blockade, despite the DSL email and its clear statement that rules violations can be subject to immediate disciplinary consequences.

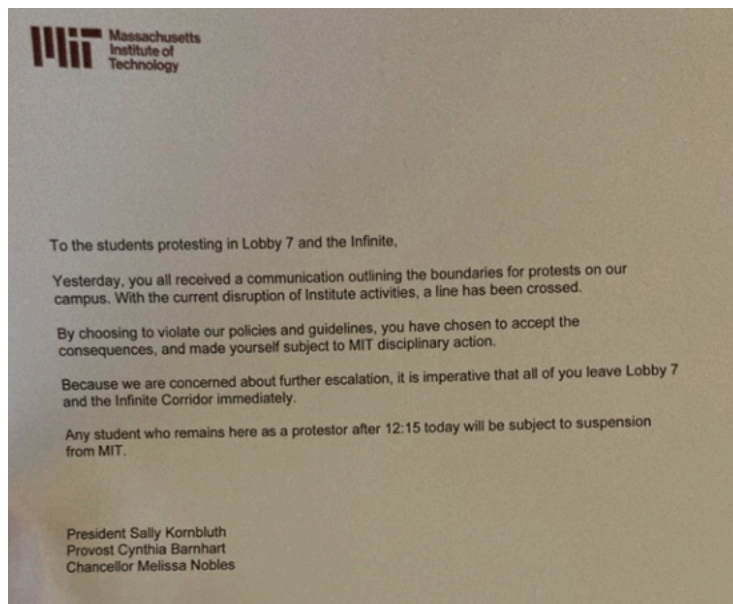
November 9th, 2023: Blockade Rally Out of Control

The CAA announced a full-day blockade of Lobby 7, in clear violation of MIT’s protesting policies. Following repeated requests by members of the faculty, MIT’s long-standing protest policy was sent to all members of the MIT community as a reminder of what actions are allowed on campus. The CAA chose to ignore MIT’s guidance and announced that they would proceed with the illegal blockade.

Following the CAA’s decision to disregard MIT’s policies, DSL called for a meeting with leaders of the Jewish community, asking them to avoid counter-protesting the CAA blockade. In light of the numerous events that took place the weeks before, and the rules clarification shared with the community, the meeting attendees asked what consequences there would be for this unlawful protest. Despite acknowledging their ability to enact interim disciplinary action to handle the blockade, DSL did not offer assurance that this event would be handled differently than past events or that it would lead to consequences this time. The meeting attendees expressed their concern about MIT’s lack of a concrete action plan for handling the planned blockade or past events. They explained that incitements to aggression against the Jewish community had become unbearable for them, that they were being dehumanized on campus, and that they felt that this time they must stand and show their humanity on campus.

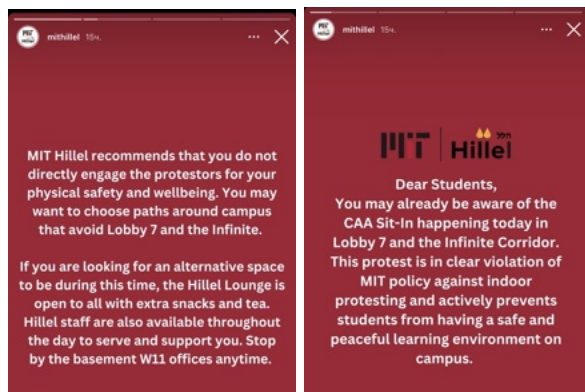
By not ensuring clear physical separation between the groups, MIT unintentionally facilitated a direct interface between the groups, which risked turning physical.

Seeing a real risk for a physical altercation, MIT leadership used its interim action policies and issued a warning at noon that all students remaining in Lobby 7 after 12:15 pm would be subject to suspension (including any personal ramifications such action can lead to). The letter was handed to the students by faculty and student support staff, who clarified that this instruction came directly from the president.



Although the Jewish counter-protesters left, without exception, CAA protesters chose to stay and defy the President’s orders.

Later in the day, following [social media calls](#) by the CAA, numerous unaffiliated non-student protesters arrived to join the protest and flood the Lobby 7 area. Warnings were subsequently issued by the MIT Police and by Hillel to avoid Lobby 7.



Dear students,

A number of you may have been present in Lobby 7 today, where we know a letter was distributed from the Institute leadership concerning possible disciplinary action. If any of you receive further communications from the Institute concerning this matter, please us know as soon as you can.

Very sincerely,

Chris and Sophia

[P. Christopher Zegras](#) (he/él)
 Professor, Mobility and Urban Planning
 Head, [Dept. of Urban Studies & Planning](#),
 Massachusetts Institute of Technology
[77 Massachusetts Avenue, Room 7-337 | Cambridge.](#)

MIT Advisory <mitadvisory@mit.edu> to MIT ▾ Thu, Nov 9, 5:01PM (8 hours ago) ☆ ↶

MIT Advisory: Please avoid Lobby 7 due to an ongoing demonstration. Seek alternate routes. Beginning at 5pm, MIT Main Group buildings will be accessible via MIT ID card only. See [emergency.mit.net](#) for updates.

Later, while students were still refusing to leave Lobby 7, the Department of Urban Studies (DUSP)t Head and DEI officer reached out through an official email. They did not condemn the students' breach of MIT rules, nor urge compliance with the MIT leadership's directive to vacate the area. Instead, they inquired whether the students had received further notices from the Institute regarding potential suspensions. The message was interpreted by many students as an indication that the Department supports the CAA students in their stance against the MIT administration and would defend them from the consequences of breaking MIT's policies. The DEI Officer for DUSP who cosigned this email, Sophia Hasenfus, had previously endorsed X/Twitter posts stating that "Israel doesn't have a right to exist" and denied the beheading of infants on October 7th, as [seen here](#) (the X account is no longer public).

November 12th, 2023: Boston Rally Blocks Mass Ave

The CAA co-sponsored a rally that came to protest at MIT, blocking Mass Ave and entrances to Lobby 7. Chants calling to “Globalize the Intifada” and “There is only one solution: Intifada revolution” rang through MIT’s campus. As mentioned above, it is widely known that in the context of Israel many uses of “Intifada” refer to violence against civilians. Calling for it to be globalized, in the context of the 10/7 massacres, was reported to have raised fear among Jewish students who worry this violence could target them here at MIT. Many Jewish students reported locking themselves in their dorms out of fear of being harmed by these non-MIT protesters, and many decided to travel home because it was too much to handle.



Speeches delivered that day were directly aimed at inciting violence, for example:

“It is our duty to fight... history requires trouble... resistance is resistance...it is not enough to exist passively...not enough for us to come out and march...we have to shake history with our own two hands...when we free Palestine the whole damn world is coming with us...resistance requires sacrifice.”

The leaders of the CAA also delivered speeches taunting MITs administration for backing down:

“Sally Kornbluth is new to MIT; she doesn't know how we operate yet. We won't back down (repeated manyfold)...We stood up to one of the most powerful institutes in the world and got THEM to back down!”

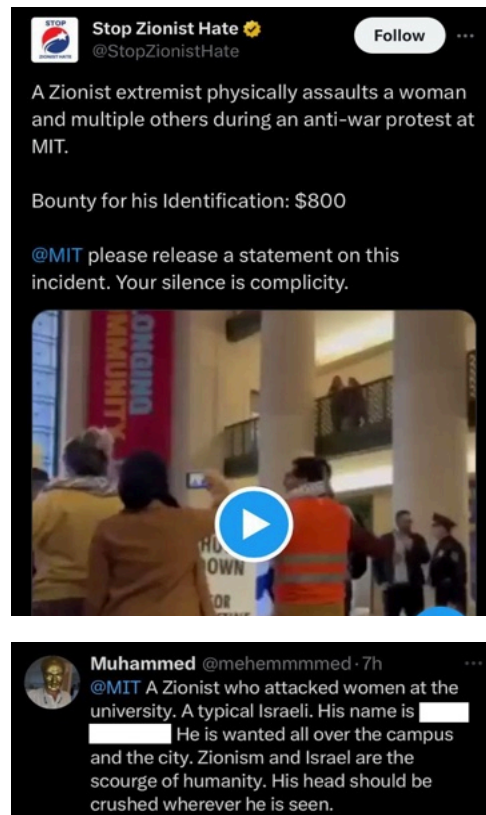
November 13th, 2023: Online bounty on Jewish student

Videos from the Lobby 7 blockade are being posted online. First by MIT students and then shared by others. One Jewish student in particular was identified trying to enter the Infinite directly, walking through students blocking their way.

A carefully edited video showing only a small part of the full incident (e.g. omitting parts where Jewish students were shoved) was shared online and went viral. The popular Twitter page “Stop Zionist Hate” shared the video, [offering a \\$800 bounty](#) to anyone who can identify the student. The student was named soon after and a different post appears stating that “he is wanted all over campus and the city. Zionism and Israel are the scourge of humanity. His head should be crushed wherever he is seen.”

This is the most egregious case of Doxxing we are aware of. The student stayed locked up in their dorms for weeks with their friends bringing food, check-ins from the police, and their family terrified for their safety. While less extreme, there are unfortunately many more cases of Doxxing, promoted explicitly by MIT students.

MIT has an [off-campus misconduct policy](#), which it can choose to apply to online behavior, just as it would to real-world altercations between students on the Boston Common. We are not aware of CoD reviews of student Doxxing incidents and are hoping they are indeed being done.



November 14th, 2023: Announcement STAH initiative

A new campus-wide initiative has been announced: Standing Together Against Hate (STAH). The [announcement](#) talks about the rise of antisemitism in the world and how we cannot let it poison our community. It says that “antisemitism will be our initial primary focus” and that a “group within it [STAH] will spearhead efforts to combat antisemitism at MIT, and we’ll announce the leaders soon”. The leaders were never announced.


November 14th, 2023: “Whatever means possible:” Safety Concerns Stoke Fear

Several instances in which non-Jewish students were exposed to hateful and troubling behaviors have been reported. Such incidents have been communicated as warnings to Israeli/Jewish friends to keep out of harm's way, or directed towards non-Jewish students who would not

disavow their Israeli friends. In some settings, students shared that they were required to express support for Palestine and/or condemn Israel in order to be included in parties. In other settings, if they are not willing to take a side, they are told that they are “genocide supporters”.

In the example below, a non-Jewish student shares a distressing account of the hostile environment on campus after witnessing fellow students condoning violence. Note the “by any means possible” rhetoric, which has been normalized on campus.

Subject: Regarding the Safety of Jewish Students

Dear 

I commend your brave message earlier today calling for the release of the innocent people held hostage by the terrorist organization Hamas, and your call for peaceful, reasonable dialogue between Jewish students and Hamas supporters.

However, and I say this with the best intentions possible, I believe that you are wasting your breath. A memo put out earlier today by the CAA, Palestine @ MIT, Black Students Union, Black Graduate Students Association, and Arab Students Organization praises the actions of Hamas, saying that it is the right of the "oppressed" to fight their oppressors using whatever means they wish.

I live in a majority pro-Palestine ILG, which is why I am not posting this to all of MIT, for fear of my well-being, but I would like to share what I have heard from several members of the CAA residing at the ILG, including several personal friends of Jonathan. They say that Israeli Jews, including children, "deserve" the violence perpetuated against them for residing in Israel while Palestine is occupied, and that Jews as a whole "deserve" the treatment given to them at MIT and other universities if they support Israel.

I fear that the pro-Hamas protests will eventually turn violent, as they are lead by people who believe that violence is an acceptable means of protest.

I implore you to not tell others that I said this, but to share this message to the MIT Jewish community: the CAA, BSU, and ASO view violence as an appropriate form of protest and will almost certainly resort to larger-scale violence eventually. If you fear for your safety, you should reach out directly to the police, not to the useless administration who tacitly supports the CAA.

Keep fighting the good fight,

November 15th, 2023: Recording the MIT Faculty Meeting

An Institute-wide faculty meeting was convened to discuss the situation on campus. Students from the CAA attended, which is highly uncommon but allowed by MIT rules. After the meeting, videos were circulated on social media, showing the president addressing selected faculty comments. Sound recordings of individual faculty were also disseminated, even making it to NPR. The recordings and videos were reported to have been edited to include only selected statements, allowing them to be presented out of context. This led to the Faculty receiving harsh responses, accusing them of promoting extreme stands (e.g. against DEI), which they never did. To the best of our knowledge, information from a faculty meeting was never disseminated publicly and in such a falsifying manner.

The students also attended the next institute-wide faculty meeting on February 20th. This time as a larger group, with one even carrying a drum. At the beginning of the discussion session, a faculty member called an executive session. The motion was supported by the faculty and the students were instructed to leave. The meeting continued without interruptions.

November 16th, 2023: Chaplain event incites hatred against jews

A student attending an event titled “Planetary Health: Indigenous Land, Peoples, and Bodies” hosted by an MIT Interfaith Chaplain, reports that the chaplain repeatedly diverted the discussion to proclaim Israelis as white European colonizers and Palestinians as oppressed people of color. e.g., “[Palestinians are] wrongfully subjugated and oppressed by racist white European colonizers”. Towards the end of the event the Chaplain was reported to have asked the Jewish students to self-identify when serving dessert. Students attending the event reported feeling fear and dismay at this behavior by an MIT staff member, who still holds a student-facing role today.

Students report that the Interfaith Chaplain in question participated in the “victory is ours” November 9th protest, was a *speaker* at the November 12th protest that blocked Massachusetts Ave, and was a participant at the CAA’s “artmaking” event on February 8th which was organized to create materials for the group’s unsanctioned protest on February 12th. The Chaplain is reported to frequently underscore the singularity of Palestinian Indigeneity at CAA events, without any mention or reference to the written history of Indigeneity of Jews. While everyone is entitled to their own personally held beliefs, one can question the appropriateness of such active participation in CAA events by an MIT employee serving in a student-facing role, and who should be a resource to all members of our community.

The behavior of this Chaplain was reported to IDHR by a student whistleblower, who hoped to stay anonymous for fear of retaliation. However, despite the damning claims put forth, and the fact that the event described in the complaint was public with several witnesses that can be contacted to corroborate the complaint, IDHR decided not to investigate it. This interfaith Chaplain, who preaches antisemitism, is still employed by MIT in this role. The ordeal of the anonymous student who reported this to IDHR, and was later forced to identify, is detailed in this document ([link](#)). The initial report, which was sent also to members of MITs’ senior leadership at the time, is pasted below:

Dear MIT faculty,

At last night's "Planetary Health: Indigenous Land, Peoples and Bodies" event, [Interfaith Chaplain](#) explicitly diverted the group discussion, **4 times**, to proclaim that Palestinians are being "wrongfully subjugated and oppressed by racist white European colonizers" (among other similar statements).

The most disturbing portion of the evening was when Nina instructed attendees to remain seated while she prepared dessert. She mentioned that there were three desserts, one of which is Kosher (the macaroons), and she **asked people to raise their hands if they are Kosher**. She proceeded to walk around handing out the desserts to each of us in attendance. As she did this, Nina examined our reactions to the desserts in a way that made me, a non-Jewish American student, actually feel that she was trying to figure out if I was.

As an attendee of this event, and a lifelong member and ally of the Indigenous community in my hometown, I am deeply disturbed by Nina's criticism and exhortation of groups that, needless to say, have nothing to do with Native American sovereignty, rights, or environmental justice on MIT's campus. In fact, two of the evening's invited guests – an Elder of the Ramapough Lenape Munsee, Deer Clan, and a Professor who founded the Quechua Initiative of Global Indigeneity at Harvard University – expressed visible uneasiness in their comportment when Nina brought up the "genocide in the Middle East perpetrated by Israeli colonizers." Nina's omission of the reasons for the diaspora of Jewish people that led to the founding of Israel (i.e., the holocaust) is also indicative of her bias. One-on-one, I reminded her at the event that the history of the Jews in Israel is ironically quite similar to the diaspora of Nations in the American West who were displaced from the East and had to find new homes. She paused, looked at me like I was crazy, and then proceeded to dismiss my comment by clarifying to a larger group that Israelis are colonizers.

At 24 years old, I have studied at four different academic institutions between high school, college, and now MIT. In all that time, I have **never felt as uncomfortable as Nina made me feel yesterday**, let alone in a space devoted to Indigenous heritage and honoring the voices of those who perished simply because of their heritage. To that end, as a student who feels no particular connection to the Israel-Palestine conflict, I am **outraged** by Nina's behavior. After doing some reading, it is clear to me that Nina's words and actions are in direct violation of MIT's Discrimination and Harassment Policy, P&P Section 9.3, 9.4, and 9.5.

I believe that **Nina's role as an MIT staff member is destructive and divisive**. She inappropriately mentioned a highly sensitive situation in a safe space, a **space where she made us students feel unsafe** because of who we are or who she thinks we might be. Moreover, the Indigenous leaders who Nina hosted displayed discomfort at Nina's words, which **reflect very badly on MIT and our struggling Native American community**.

I do not demand any action be taken against Nina, but do kindly request that her actions be brought to the attention of our Institute's senior leadership.

Please keep my message anonymous.

Regards,

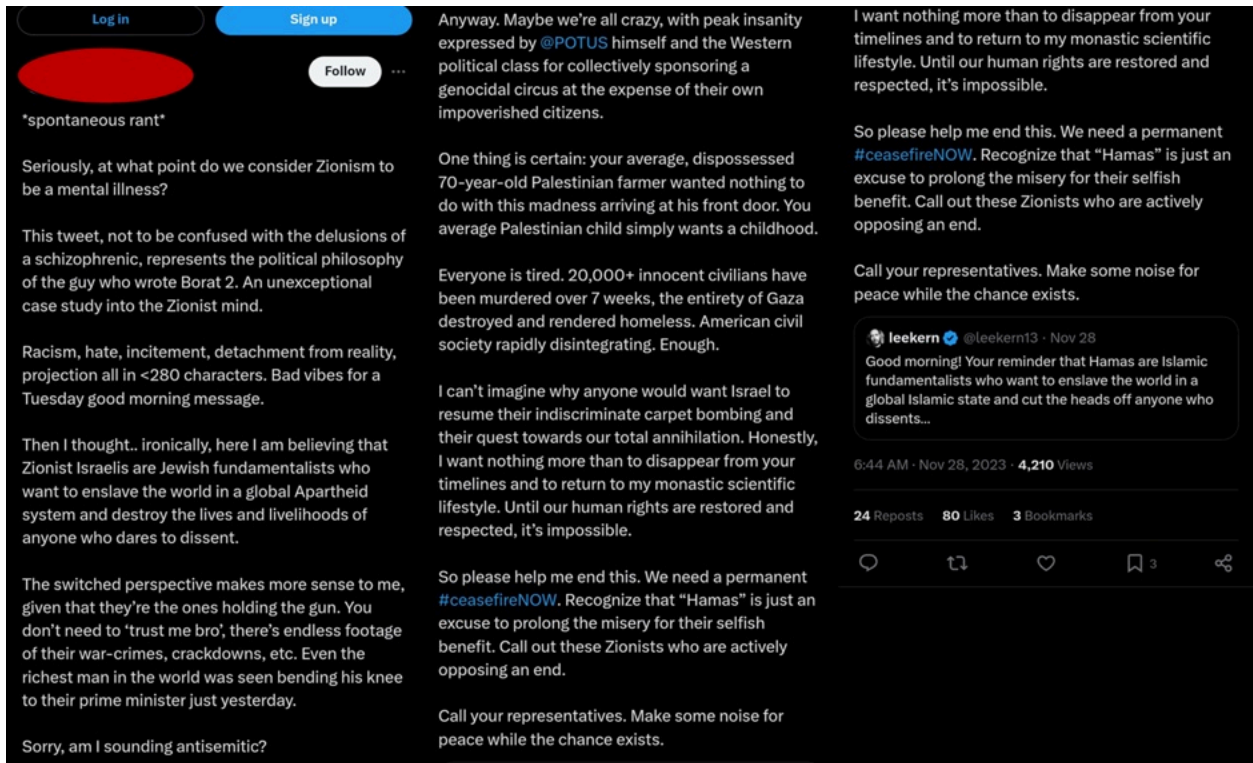
November 27th, 2023: DEI Issues Left Unaddressed

A departmental DEI officer [endorsed posts](#) online claiming, among other things, that *"Israel doesn't have a right to exist, it's an illegitimate settler-colony like the US."* and denying the Oct. 7th massacre: *"The actual president said he saw photos of beheaded babies that he didn't actually see (because they don't exist because it didn't happen), and I just think we need to unplug the propaganda machine"*. Students reported that this officer was also actively working with the CAA to arrange their rallies.

In a different case, an MIT postdoc was reported to spread blood libel propaganda and hate speech, e.g.:

"Seriously, at what point do we consider Zionism to be a mental illness? ... Then I thought.. ironically, here I am believing that Zionist Israelis are Jewish fundamentalists who want to enslave the world in a global Apartheid system and destroy the lives and livelihoods of anyone who dares to dissent."

Later the postdoc admitted: *"Sorry, am I sounding antisemitic?"* In other posts, they accused "Zionists" (which many in the MIT community are) of organ harvesting, and compared Israelis to Nazis.



Zionists not only steal our lands, food, and culture, but our dead bodies as well for organ harvesting.
I feel like I've seen this movie before.. sounds like some crazy horror film, no?

This Nazi doesn't even try to hide her hatred and racism. Average Israeli.
Lowkey @Lowkey0nline · Nov 1

In response, a concern was raised to the postdocs departmental DEI (Diversity, Equity, Inclusion, and Justice) representatives. The DEI officer acknowledged the pain that this person is causing to students, but questioned if their posts are in-fact antisemitic. They went on to claim that the conspiracy theory that “Zionists” harvest organs of Palestinians is based on “confirmed reports,” and exposing ignorance with regards to modern antisemitism that substitutes “Judaism” with “Zionism” to avoid being called antisemitic. Rather than unquestioningly acknowledging the issue and offering concrete support to the students (as commonly accepted to be the practice of DEI), this DEI officer discouraged the victims from even reporting it: “I would be very cautious before accusing any one of our colleagues, staff, or trainees of hate speech.”

Dear [REDACTED]

Thank you for sharing this with us and I'm so sorry for the delay getting back to you. I was immersed in qualifying exams these past couple of days and just emerged.

I appreciate how disturbing the posts are and I share your pain and upset at them. The tweets in question are inflammatory and polarizing and their tone is at odds with the values we try to instill in our community. We work hard within the building to set standards for mutual respect and compassion -- and we try to model and foster the kind of communication that leads away from divisiveness and towards mutual understanding. Recently, we have written to our community about the need to build greater empathy during these challenging times. And we are currently in the process of sending out additional communications to our community to reinforce our values around respectful dialogue at our upcoming bimonthly community of practice meeting (attended by faculty, staff, postdoc and student representatives from every lab and staff unit in the building) as well as with a building-wide email about resources at IDHR and elsewhere at MIT for discussions about Israel/Gaza.

At the same time, I would be very cautious before accusing any one of our colleagues, staff, or trainees of hate speech. Can I gently suggest, in the same spirit of working against polarization, that if we believe (as I genuinely do) that it is wrong to accuse Israeli soldiers of harvesting organs, it may also be a little misleading and inflammatory to compare recirculating, in effect, an old and decontextualized but confirmed report, to accusing Jews of murdering Christian children for ritual purposes ("blood libel")? Similarly, I think we would be wise to distinguish support for Palestinian rights or reposting a widely circulated letter (whose status as propaganda may have been more obvious to some than others) from antisemitism or support for terrorism.

The painful truth is that many around us are grieving and many people's lives and families are at stake. I share your desire to assert our community values as strongly as possible. And now more than ever (as a faculty member, as Associate Department Head for [DEU](#), and also as a Jew whose father was born and raised in Tel Aviv) I am committed to ensuring that those values include all possible compassion for each other's intensity -- and all gentleness for each other's fragility.

Yours with warmth and respect,

The two reports above showcase extreme incidents where Jewish community members felt the MIT system failed them. Joined with the Chaplain incident (see Nov 16 above), members of the Jewish community report that they feel alienated by the very structures on campus that are intended to foster a sense of inclusion and belonging.

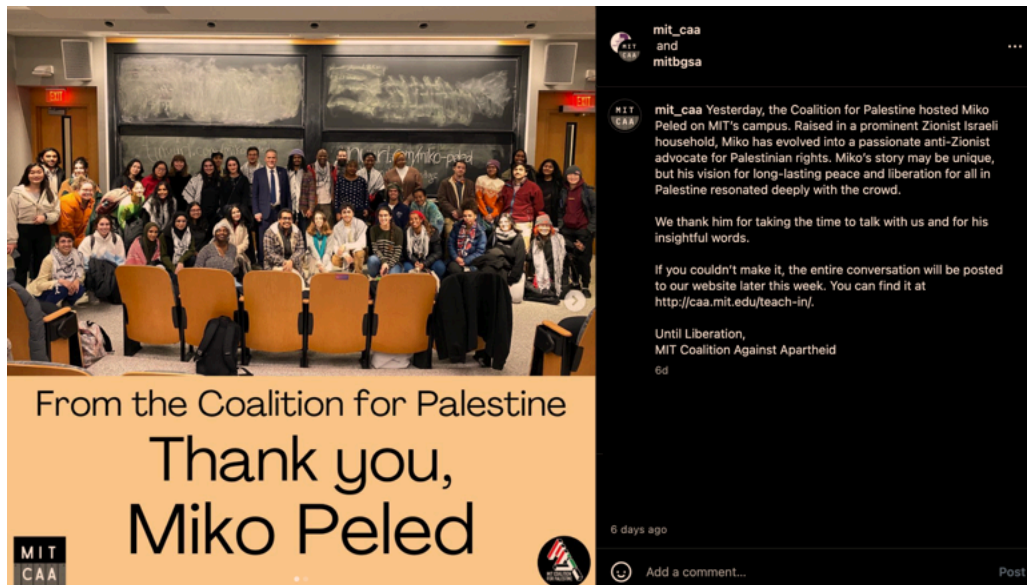
December 4th, 2023: Antisemitism is not the priority

Despite the President's [clear message](#) on Nov. 14th, an [update by the Chancellor](#) stated: "... we said that antisemitism would be our initial focus. ... we have come to appreciate that antisemitism and Islamophobia – also on the rise, and often underreported – are best addressed at the same time." That message did not announce how the Institute will go about addressing these issues. We are unaware of any committee formed to address antisemitism or Islamophobia at MIT as was done, for example, at Harvard.

December 6th, 2023: CAA Hosts Speaker Encouraging Targeting of Hillel

CAA hosted Miko Peled at MIT. Despite formally being under suspension from non-academic activities, many of the students leading the Lobby 7 blockade participated in this event. Students in attendance reported that Miko explicitly encouraged students to combatively approach individuals at the Hillel Center for Jewish Life at MIT:

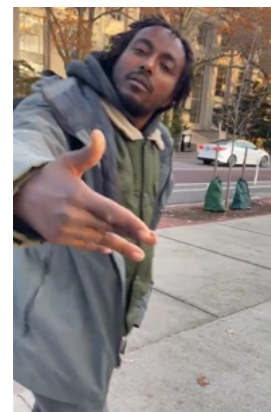
"You go to Hillel and whatever the mascot is here and tell them they need to answer how they don't condemn the genocide in Gaza."



December 6th, 2023: Harassment of students at Hillel

A man with paranoid beliefs harasses people at the Hillel building. He does not seem affiliated with MIT but does approach Jewish students and accuses them of being Mossad agents. Later he looks through the Hillel lounge window and starts peeing on it, in front of the students studying there.

While the person seems to have nothing to do with MIT, it shows conspiracy theories about Jews seem to be spreading. Combined with the events of the past weeks at MIT, many students report becoming extremely nervous. They are afraid and can't find shelter even at Hillel.



December 7th, 2023: Holocaust desecration posters

Posters desecrating the memory of the Holocaust appear on bulletin boards around campus. Over a red background, the text of the poster reads “The right and wrong way to understand Never Again.” The QR code on the poster leads to an [Instagram video](#) of a Bob Avakian, that many view as antisemitic and inciting.

December 13th, 2023: Karchmer Resignation

Algorithms lecturer Mauricio Karchmer resigns. His class is one of the most popular classes at MIT, teaching ~60% of the undergraduate student body. Explaining his resignation Karchmer [writes publicly](#) about campus events and their impact on himself and other members of the Jewish community:

“Students chanted “Free Palestine” and “From the river to the sea” with fury and at times glee, like they were reciting catchy songs instead of slogans demanding the erasure of the Jewish people. Even worse, faculty members started endorsing this behavior. One DEI officer at MIT [liked](#) an October 17 post on Twitter stating that “Israel doesn’t have a right to exist, it’s an illegitimate settler-colony like the US.” On October 18, a renowned faculty member in the neuroscience department [accused](#) Israel of committing “genocide” on Twitter. Then, the next day, she [tweeted](#) that her department was seeking a “diverse pool of candidates” for a tenure-track position in her department’s “inclusive community.” I remember thinking, with bitter irony, that Jewish academics need not apply.”

He describes his disappointment with the one-sidedness of the [faculty newsletter articles](#) and lack of support from his non-Jewish peers, *“The only voices in the newsletter standing up for Jews were Jewish. But we are too few to fight this battle.”* And his pain for the young Jewish students on campus:

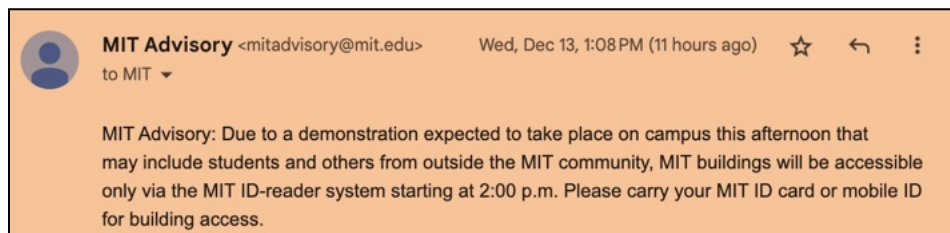
“Though I cringed as I read these faculty letters, and shuddered as I walked by protests on campus, nothing has hurt more than watching the Israeli and Jewish students—who comprise fewer than 6 percent of the MIT student body—suffer.”

Dr. Karchmer is now teaching at Yeshiva University, where he feels safe and appreciated. We strongly recommend reading his [free-press article](#).

December 14th, 2023: Hockfield Rally Inciting Violence

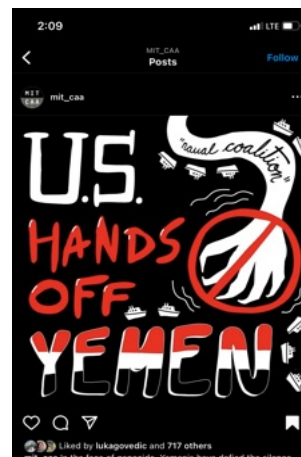
At this protest, which was organized following MIT rules, crowds cheered for “armed resistance” and to “hold a knife to their throats.” A speaker advocated pushing back against MIT, saying “that means staying at their throats.” Once again, there were calls for “no peace.” Perhaps these phrases were meant poetically, but again in the context of the Oct. 7th massacre, it is natural for Jews to feel a credible fear of being physically attacked by those making such statements.

MIT Advisory for this event acknowledged the issue, and helped restore some safety to the students:



December 21st, 2023: Support of Houthi Terror Attacks

Two days after the US announced the creation of a naval coalition to defend the Red Sea shipping route from attacks by the Houthi Terrorists, the CAA [posted on Instagram](#) in defense of the terror attacks of the Houthis, calling for the US to take their hands off of Yemen. The accompanying post hailed the aggression of the Iranian-backed militia as “a moral ban on Israeli commercial ships ... to exact economic pressure until a ceasefire and humanitarian aid is achieved for the Palestinian people.” The post continued to conflate the acts of the Houthi Terrorists with the Yemeni people. They failed to acknowledge the role that the Houthi terrorists played and continue to play in that war. To that end, CAA failed to acknowledge the Houthi terrorists’ attitudes towards the US, Israel, and Jews as expressed on their flag; the Houthi slogan reads, “God Is the Greatest, Death to America, Death to Israel, A Curse Upon the Jews, Victory to Islam.”



January 11th, 2024: Words are Violence?

Using someone's 'deadname' is considered a “*violent act*”, but calling for the genocide of jews “*depends on the context.*”

In her congressional testimony (Dec. 4) President Kornbluth insisted that calls for the genocide of Jews are not necessarily bullying or harassment; they must be pervasive and depend on the context. This appears to be at odds with the harassment training required of the entire MIT community, where ‘deadnaming’ someone (i.e. using their ‘former’ name) is itself a violent act, regardless of context. See screenshot below, from the section on LGBTQ+ 101 education.

LGBTQ+ 101: Education, Allyship and Self-Advocacy
44% COMPLETE

- Welcome
- INTRODUCTION
- Terminology
- COURSE CONTENT
- Joaquin and Undergraduate Student
- Knowledge Check 1: Joaquin and Undergraduate Student
- Rachel and Carol
- Knowledge Check 2: Rachel and Carol

You received a message from Tim.

Hey, let's talk about deadnaming

While technically you can deadname any person who now uses a different name, the term is used in relation to trans, gender nonconforming and non-binary people, and it is considered a violent act.

Deadnaming someone, even when done accidentally, brings all of their negative life experiences with that name to the surface. It forces the person to deal emotionally with all of that trauma at a random moment when they may not be prepared to do so.

January 24th, 2024: Standing Together Against Hate Program Publication

The STAH spring lectures program is [published](#). It includes 4 talks: one on free speech, a couple on antisemitism and Islamophobia, and a talk about anti-Palestinian racism. No talk on anti-Israeli bigotry or demonization of Zionism, despite the Jewish community being clear about it being a major issue for them on campus.

The Islamophobia panelist, Dalia Mogahed, is an activist who was [reported](#) to post in a way that endorsed Hamas terrorism as an act of lawful “resistance.” She suggested that Israelis are "savages" who "kill babies" and "bomb hospitals" and even went as far as to insinuate that Israel doesn't care when its women report sexual assault complaints and usually does not believe them, to raise doubts on reports of [large-scale sexual assault on Oct. 7](#).

Free speech panelist Erwin Chemerinsky is a scholar, serving as the dean of the University of California, Berkeley, School of Law. He was [sued](#) in November over "unchecked" campus antisemitism. After the publication of the program, the title of Chemerinsky's talk was modified to include antisemitism: An act which many in the Jewish community described as adding insult to injury.

We present a collection of student responses from the night the program was published:

- “This really sucks. I feel that MIT simply hates Israelis. I regret coming here.”
- “MIT admin is like actually like communally concussed or something. What's wrong with them?”
- “MIT's way of combating hate is nuts”
- “I honestly don't know what's worse, that MIT can't do simple fact checking before inviting a person, or that they did and think it's ok inviting them despite retweeting statements that Hamas has a right to massacre Jews”
- “I couldn't care less about the speaker. It's about the Institution's decision making.”
- “What I understand from this is that hate against Israel is ok at MIT and will not be addressed by STAH”
- “There is an Israeli saying that goes something like: "it's ok to pee in the pool, it's not ok to pee from the diving board”
- "I am trying not to react emotionally but this [denial of sexual assault] strikes a nerve for me.”

February 12th, 2024: Lobby 7 Takeover

In parallel to the first STAH talk about antisemitism, the CAA announced an ‘emergency rally’ protest outside the student center. The protest was not approved by MIT and was in direct violation of the protesting rules published just days earlier. The protest included statements against MIT's attempt to promote dialogue: “We're tired of dialogue across difference when there can be no f-ing dialogue across difference”. They further incited hatred of Jews and Zionists: “Our safety is threatened by white supremacy and the dangerous equations of Judaism

and Zionism” and claimed that the Jewish tradition is used to justify Israel’s “colonialist capitalist white-supremacist agenda.” Three non-Jewish students, who were walking by on their way out of the gym, reported concern that protest participants were making statements that called for “Jihad” against Israel.

They then moved the protest into Lobby-7, occupying it *again*, after repeated warnings from the MIT administration. Protestors hung flags and banners shouting “Hear us loud, hear us clear, IOF not welcome here”. IOF, short for ‘Israel Offensive Forces’ / ‘Israel Occupation Forces,’ is a pernicious reference to the IDF (Israeli Defence Forces). To many, their words are clear: Israelis who served in the army and/or are currently serving in reserve duty are not welcome at MIT, knowing full well that essentially all Israeli students on campus are veterans of its compulsory military service program.



The next day, President Kornbluth issued a statement. She shared that MIT is “suspending the CAA’s privileges as a recognized student organization” but makes it clear that “suspending the CAA is not related to the content of their speech.”

In talking about campus climate she acknowledges the ongoing shunning of Israeli and Jewish members of our community (“as members of one community, we shouldn’t feel it’s OK to vilify and shun Israeli and Jewish members of our community”) but then immediately build an appearance of symmetry by stating that “Equally, we shouldn’t feel it’s OK to vilify everyone who advocates for the Palestinian people as supporting Hamas.” We are aware of, and strongly condemn, isolated incidents of MIT community members generalizing members of the Middle-East-North-Africa community as terror supporters. This is reportedly happening primarily around protests which we understand relates to the CAA’s public support of the Oct. 7th massacre. However, this is not a

MIT's Harassment Policy

Harassment is defined as unwelcome conduct of a verbal, nonverbal or physical nature that is sufficiently severe or pervasive to create a work or academic environment that a reasonable person would consider intimidating, hostile or abusive and that adversely affects an individual's educational, work, or living environment (P & P).

Harassment that is based on an individual's race, color, sex, sexual orientation, gender identity, pregnancy, religion, disability, age, genetic information, veteran status, or national or ethnic origin is not only a violation of MIT policy but may also violate federal and state law, including Title IX of the Education Amendments of 1972, Title VII of the Civil Rights Act of 1964, and Mass. General Laws Chapter 151B. You can learn more by visiting [MIT's Policies and Procedures](#).

wide-spread notion within the MIT Jewish community. The Jewish students groups do not hold protests targeting their peers and are not leading an effort to socially shun other members of the MIT community. Therefore, the administration's insistence on building a symmetric narrative of two groups that are holding an altercation on campus is viewed by many in the Jewish community as a heartless action that is meant to disguise what they feel is the real situation at MIT: one group of students is inciting hatred of another.

We do realize that many students feel that they are protesting for peace. Our goal here is to present how this is impacting a different group of students on campus, unpeacefully. We only intend to condemn words and acts that incite hate, even if that is not the intention of some of the students making them.

Graduate Student Union involvement and support of the BDS

According to ADL: *"The Boycott, Divestment and Sanctions movement (BDS) is an international campaign aimed at delegitimizing and pressuring Israel, through the diplomatic, financial, professional, academic and cultural isolation of Israel, Israeli individuals, Israeli institutions, and, increasingly, Jews who support Israel's right to exist... In practice, the global BDS movement doesn't seek to create a Palestinian state but rather aims to dismantle the Jewish state and end the right to Jewish national self-determination on any portion of this contested land."*

01/22/2018 meeting minutes: Decision to organize with UE over UAW includes considerations of promoting and preserving BDS support, as shown from the discussions that lead to this decision:

UAW 1/22 Meeting Agenda
Introductions
- What is your role as regional director?
- How will you interface with our local?
Unanswered questions from previous meeting
- Where is the line between local, regional, and national issues for you? This was brought up as a concern for how the UC students BDS bylaw was struck down. BDS thing was struck down because the election didn't follow procedure

08/31/2020: Decision about which website builder to use (Squarespace over Wix) involve BDS considerations:

Union Website Discussion

KF: Wix or SquareSpace? Wix is an Israeli-owned company, which conflicts with BDS. Let's continue the discussion.

Jo: I've never been clear on impetus behind this decision. For the long term, why not just host our own website. Our site will be mostly static, right? At most, an embedded Google Form. If done correctly, this would save money and look more professional.

KF: [REDACTED] have agreed to work on this. They both prefer to work with one of these platforms. Kaylee wants to work on Wix, but both are fine with SS.

Jo: Is this still being done exclusively within going public.

KF: Yes.

JR: If someone wants to design a website for the union, that's great. Right now, our options are to go with one of these. In the long run, SS will avoid potential divisiveness. [REDACTED] doesn't mind SS. We've already used Wix for RISE, and we're not taking that down or transferring. After the RISE campaign is concluded, we can just transfer the relevant material to SS.

PK: Re: national policies, the UE national has endorsed BDS. One of the only national unions to do so. No blowback from membership, but big blowback from Israeli agencies. I can also put folks in touch with person who does webdev for UE national. Drupal is good and user friendly.

KJC: Agreeing with [REDACTED] our local BDS question is important, but we need more discussion than now will allow. Let's decouple the questions and go with SS for now. We can figure out the BDS question down the line. Let's not put the cart before the horse. No need to discuss

BDS *right now*. Should later, but let's do so later.

AT: I agree in that I want to avoid having this discussion. It's also unimportant because it's a losing issue regardless of where we come down. This is never going to be an issue for which we fight. A position would be purely symbolic and would cost political capital. Choosing SS would kind of duck the question, but not really. It feels more like taking a position. It is not sufficient for an org to be Israeli to merit condemnation. That bothers me. Also, managing multiple websites is much easier if we do so in one platform. The smartest thing would be to defer completely to the people making it happen.

JB: I would strongly endorse that. Saying "we're picking Squarespace instead of Wix because of BDS" means we're supporting BDS, not deferring on taking a stance.

PK: The issue needs to be practical. We should look into the future with user friendliness. Whatever we do use should be user friendly. We do this for in-person workshops, too. If there's a charge for the committee, it should be to be as user-friendly as possible. It needs to be accessible for people to pick up and carry years down the line.

KF: Any of these platforms are very user-friendly. Hopefully, that won't be a problem. How do we feel about deferring this to #c_going_public?

No disagreement.

KF: Then I'll bring a proposal for fund approval at the next OC.

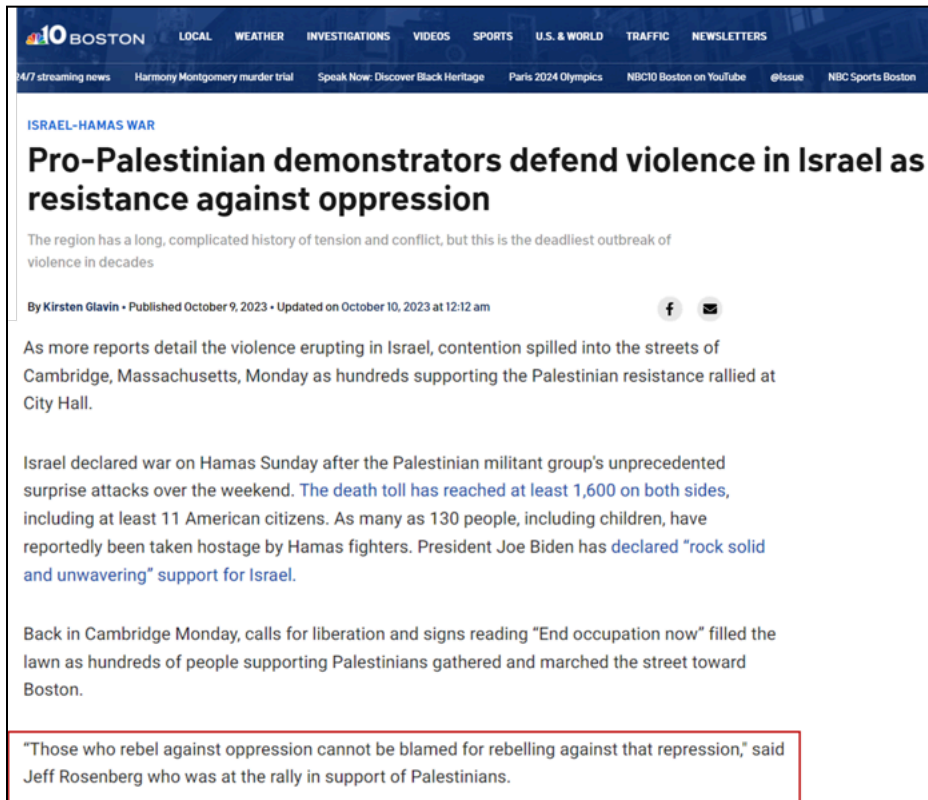
Fall 2021: MIT Hillel has a conversation with GSU leadership to ask for a guarantee that BDS won't be on their agenda. GSU refuses to promise anything concretely, but they do make handwavy comments about caring about employment conditions rather than political statements.

04/08/2022: BDS Boston congratulates GSU for winning the NLRB vote to unionize.



02/27/2023: GSU sends an email explicitly condemning anti-LGBTQ hate speech on campus. At the same time, they made no comment about anti-Israeli and anti-Jewish hate speech on campus since October 7th.

10/09/2023: A GSU employee who is no longer a student at MIT is interviewed on Boston 10 as a participant of the Pro-Hamas rally at the Cambridge City Council. He justifies the Oct. 7th massacre in his interview.



11/05/2023: GSU employee leads protest through the MISTI offices

11/09/2023: Grad Union Reps and leadership spotted participating in the protest in Lobby 7

11/10/2023: GSU email expressing support for the Lobby 7 protest and calling on MIT to protect students rights to protest

We, as labor unions on MIT campus, stand united in condemning MIT's recent infringement on our community members' freedom of speech and right to peaceful protest. We recognize MIT's recent actions, including threatening suspension on peaceful student protestors and sending police to shut down an educational event, as attempts by the MIT administration to silence student voices and intimidate and punish students for protesting.

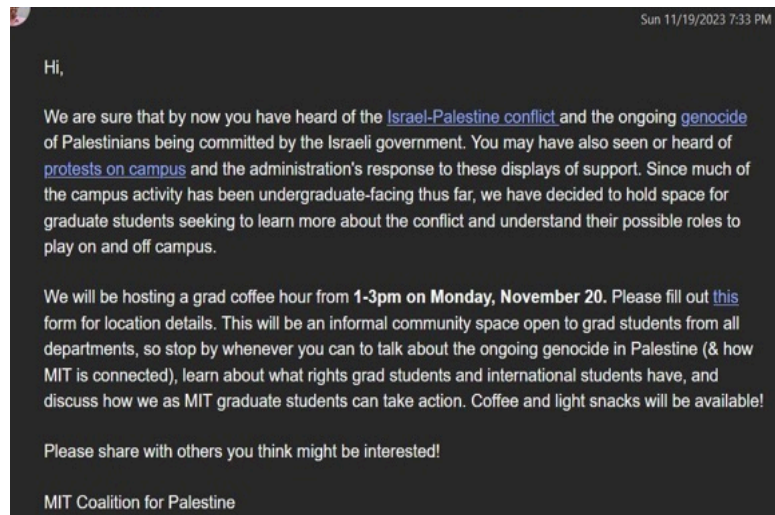
As unionized workers, we understand how important it is to protect our democratic rights to free speech and protest, as these are foundational rights to the labor movement and workers organizing together for a better life. MIT's threats against students exercising their basic First Amendment rights create a culture of fear and censorship on campus. We strongly condemn MIT's actions and stand united behind students who choose to exercise their democratic rights to free speech and protest.

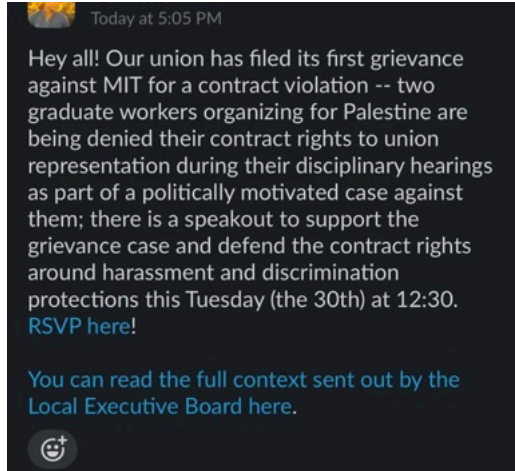
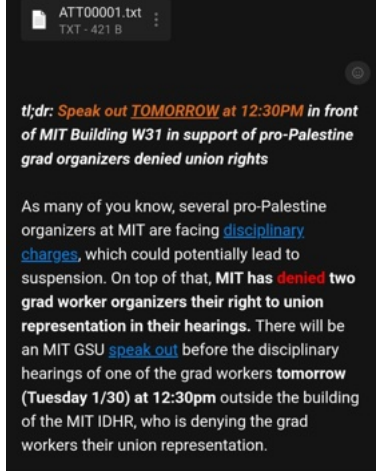
We call on the MIT administration to uphold the rights of students and workers to peacefully protest on campus, and on the entire MIT community to stand together against political censorship.

MIT GSU-UE Local 256 Interim Grievance Committee
UNITE HERE Local 26
MIT Libraries Union - AFSCME Local 2353

11/20/2023: Graduate student coffee hour for Palestine hosted by GSU employee and others.

01/25/2024: GSU sends an email announcing that two union members are being investigated by IDHR for their participation in pro-Palestinian demonstrations and are being denied third party representation at the investigation. GSU falsely claims that the denial for third party representation violates the terms of their contract and calls for a protest in front of the IDHR offices. CAA emails out a call for people to join the protest.



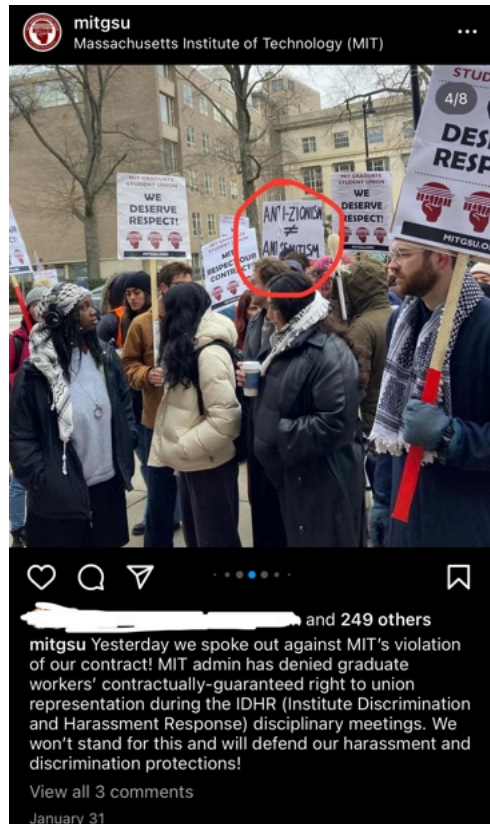
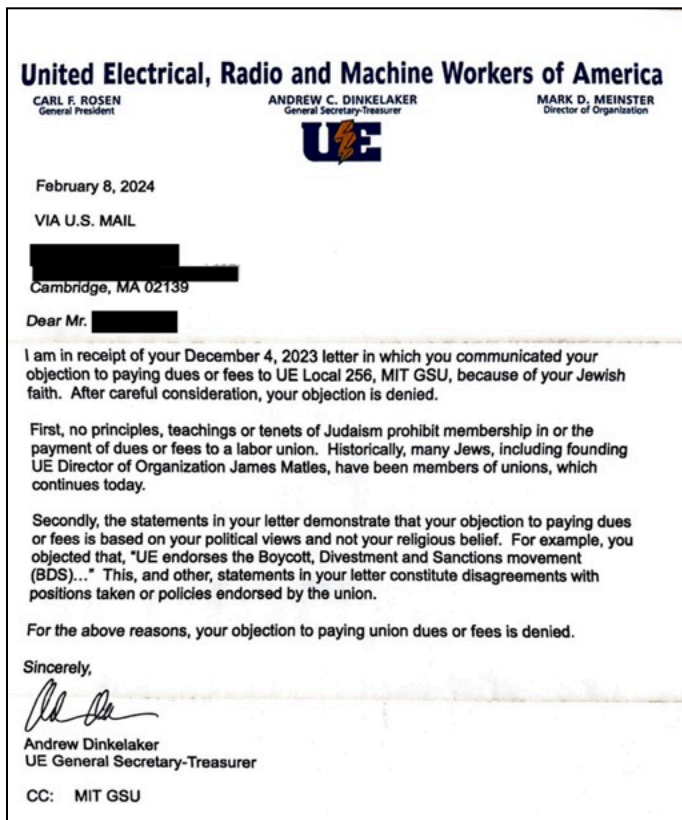


01/30/2024: GSU holds a rally outside of IDHR offices in support of the union members being investigated for violation of campus rules. The rally quickly evolves into a “bash Israel fest”.

01/31/2024: Rally and post by GSU.

02/08/2024: Despite persistent attempts, Jewish students have been unable to exercise their "religious objection" to avoid paying dues to a BDS supporting union.

* Additional information can be found in this [link](#).



What is Dormspam? - A major source of distress for Jewish students

Dormspam is a campus-wide **unmoderated** emailing platform. It is an essential resource for students living on campus to keep up with campus activities and events, and to obtain updates on day-to-day dorm-related issues. Since Oct. 7, starting on the very day of the attack on Israel, dorm-wide emails (~4,500 students) that contain rhetoric that is hostile to Jews and Israelis have been circulated 2-4 times a week. In several instances these emails turned into heated discussions on a campus wide platform and even into personal attacks on Jewish and Israeli students. A number of instances have been recorded in which students not involved in the email thread discussion were named and personally attacked.

This form of public shaming of individuals on our campus has been unheard of before Oct. 7 and has been targeted only at Jewish and Israeli students. It has been one of the most significant sources of distress in this community.

Several examples of messages sent via Dormspam are provided above as they relate to specific events. Below are some additional examples. Note that since most faculty are not on Dormspam, hence these were often shared as low quality screenshots.

Interestingly, the MIT Ad Hoc Working Group on Free Expression [Report](#) seems to have ‘predicted’ issues like the one presently on Dormspam. An analysis of a fictitious scenario that is centered around a ‘Conflict over Student Speech’ in a residence-hall community is described in their report (page 25-26). Therein an electronic hall-wide communications channel (similar to Dormspam) is used to promote pro-Russian views in the context of the Russia-Ukraine war prompting a student of Ukrainian origin to approach their Head of House (HoH) demanding that the student responsible for these posts be banned from the house communication media “on the grounds that his posts constitute hate speech and advocacy of genocide”. In a meeting with the HoH, the Russian student defends his posts on the grounds of free expression. This scenario is analyzed in light of the Mind and Hand book statement on freedom of expression:

“Freedom of expression is essential to the mission of a university. So is freedom from unreasonable and disruptive offense. Members of this educational community are encouraged to avoid putting these essential elements of our university to a balancing test.”

Hence, the students’ conflict requires MIT to “undertake just such a balancing test”.

One perspective asserts that

“Banning the student would deprive the living community of the opportunity to counter the posted propaganda with reasoned arguments demonstrating the extent to which his comments are misinformed.”

and instead recommends a discussion with the complainants engaged on the same communication channel to present their stance, allowing the members of their living community the opportunity to appreciate their point of view as a Ukrainian citizen.

The second perspective states that:

“Unmoderated mailing lists ... run a risk of turning into soap boxes for people with strong opinions in ways that detract from the original purpose of such digital venues. It is highly advisable that such fora have clear and explicit purposes that allow moderators to shut down discussions that deviate from those purposes in a viewpoint-neutral way.”

It goes on to explain that in this scenario, while there is value in students learning the pro-Russian arguments for the Ukraine invasion—and in practicing how to refute them—, a hall-wide communications channel that is not generally used for political discussions *“may not be the most productive place to have such a discussion. **Time, place, and manner restrictions have a long tradition in First Amendment case law, and this scenario illustrates an application of that tradition.**”* (emphasis added by us)

We note that, in both of the above perspectives, prompt action by the HoH and the dorm community is encouraged, if by education and dialogue, or by clearly defining the appropriate type of messaging allowed on a particular channel. In both cases a single communication on the channel was sufficient to justify a response. Yet, on our campus, since Oct. 7, we have seen 2-4 such communications per week; distributed not to a specific dorm group, but to the entire community of ~4,500 undergraduate students; neither of these two perspectives for action have been implemented. In fact, the Jewish and Israeli students have been discouraged from responding to the inflammatory emails through Dormspam - since this has been shown to prompt personal attacks on them. Hence, the remaining option would be the second perspective. Moderation of dorm emails is effectively done for the graduate dorm emailing lists; surely a similar mechanism could have been applied for the undergraduate Dormspam.

MIT Black Students' Union Statement in Support of the Coalition Against Apartheid at MIT

Kaelyn C Dunnell
 To: bsu-exec
 Cc: Sally Kornbluth; Melissa Nobles; Suzy Nelson
 Tue 11/14/2023 7:00 PM

Overview

- This past Thursday, students were threatened with suspension by MIT administrators for peacefully protesting the genocide of the Palestinian people.
- MIT PD was deployed to barricade the protest (of mostly Black, Brown, Arab, and Muslim students) inside Lobby 7.
- The BSU unequivocally condemns the MIT Administration's attempts at intimidation and silence.
- The liberation of the Palestinian people is intricately tied to the global liberation of Black people – none of us are free until we all are.
- The BSU reaffirms our support for the [Coalition Against Apartheid's Principles of Unity](#).

This past Thursday, November 9th, the MIT Coalition Against Apartheid (CAA) hosted a peaceful demonstration in Lobby 7 to denounce the Israeli occupation and genocide of the Palestinian people. After facing harassment, threats, and violence from counter-protestors, students received physical letters from MIT Administration stating that "any student who remains here [in Lobby 7] as a protestor after 12:15 today will be subject to suspension from MIT." Upon request, MIT Administration refused to promptly clarify the details of this suspension (including its duration or severity), demonstrating their intent to intimidate a peaceful protest composed of mostly Black, Brown, Arab, and Muslim students.

At 5 PM that same day, MIT police officers were stationed at every point of egress in Lobby 7 for the remainder of the demonstration, regulating who could enter and exit the building. Students were physically blocked from accessing the building and re-entering Lobby 7, preventing protestors from using the restroom and getting food; notably, faculty members were allowed to enter the space at will to record the protest. On the morning of Friday, November 10th, the MIT Police Department was similarly deployed to block all student access to a teach-in hosted by the CAA in 10-250, effectively censoring an event centered on education. **The MIT Black Students' Union completely condemns the acts of intimidation, censorship, and restriction of CAA's peaceful protest by MIT Administration, as well as MIT Administration's threat of suspension to silence protest participants.**

Black students at MIT are no strangers to increased police presence in the midst of fighting for liberation, and it is shameful that the MIT Administration weaponized the MIT Police Department to disproportionately suppress and intimidate students who advocate for the liberation of Palestine. On Friday, several students of color were verbally and physically harassed by counter-protestors under MIT PD supervision. As we stand for the safety and rights of Black MIT students, we also stand for the safety and rights of all students who are oppressed on the basis of their identity. In the face of this attempted suppression, **the MIT BSU unilaterally supports the CAA and the Free Palestine movement, at MIT and beyond our campus.**

Black liberation is interwoven with the struggle for Palestinian liberation – none of us are free until we all are. The violent consequences of imperialism and colonialism are evident in the current age of mass incarceration and militarized police states. We must not forget that the racialized violence which Black people have been subjected to is the same racialized violence which Palestinians are experiencing under occupation. The white supremacist system of oppression that marginalizes Black people is the same system that has stripped Palestinians of their humanity for the past 75+ years and perpetuated antisemitism against Jewish people globally. However, the creation of an apartheid nation state that abuses this very same white supremacist system of oppression is not the solution to marginalization. Our fight for equity and global liberation is one and the same as the fight to Free Palestine, and the MIT Black Students' Union will continue to fight until we have succeeded.

The BSU is not deterred by the intimidation of the MIT Administration. We are committed to the **liberation of Palestine**. We support the **right of oppressed and occupied people to resist their oppression**. We fight for Palestinian liberation within the broader movement for the **liberation of all oppressed peoples**. We defend the right of every human to **lead a life of dignity**.

In solidarity,
 MIT Black Students' Union
 11/14/2023

bcc'ed to dorms, red for bc-talk

8:44

[Macgregor] Statement on Shooting in Vermont and Anti-Palestinian Racism

MacGregor
 On behalf of Safiyyah O Ogunidipe
 To mit-caa-exec
 5:54 AM

ATT00001
 TXT - <1 KB

tl;dr: WEAR YOUR KUFFIYEHs or PALESTINIAN COLORS on CAMPUS ALL WEEK!

On November 25, three Palestinian students in Burlington, VT were shot in a racially motivated hate crime. At the time of writing, their shooter is still at large. A statement released yesterday by the Arab American Anti-Discrimination Committee reads:

The students, each of them 20 years of age, are Mr. Hisham Awartani of Brown University; Mr. Kinnan Abdalhamid of Haverford; and Mr. Tahseen Ahmed of Trinity University. The students gathered together to enjoy Thanksgiving break. According to the information provided the three victims were wearing a Kuffiyeh and speaking Arabic. A man shouted and harassed the victims, then proceeded to shoot them.

We cannot describe the pain and anguish that we feel at this time, not only for the victims and their families but for the Palestinian people resisting their ongoing genocide and defending their humanity. **As Palestinians, Arabs, Muslims, and allies, we are more than familiar with violence targeted at us for our identities and our solidarity with the Palestinian people—including from our own professors and our fellow students at MIT.**

The constant demonization and dehumanization of Palestinians, Arabs, Muslims, and their allies has been constructed by the Biden administration, the mainstream media, our universities, and countless other US institutions. These institutions shamelessly construct and spread false narratives to appease Zionist pressure and justify genocide. **These acts of distorting the truth of the genocide have brought the war on Palestinian lives to our campuses.**

There can be no dialogue when bullets are fired into the bodies of Hisham, Kinnan, and Tahseen. **There can be no dialogue** when a car rams into an Arab student on Stanford's campus. **There can be no dialogue** when a six-year-old Palestinian boy is stabbed to death in Illinois. **There can be no dialogue** with the uncountable cases of assault and harassment targeted at Palestinians on our own campus.

There can be no dialogue when over 15,000 Palestinians have been killed by Israeli occupation forces in the past 50 days of genocide, with thousands more to be uncovered from the rubble.

To have your existence and struggle constantly framed as a topic of mere dialogue only **further the dehumanization and depersonalization of Palestinian suffering**. It washes away the reality of the genocide to the world.

Palestinian students are murdered in the Gaza Strip, the West Bank, and all of Palestine on a daily basis. Many lay under the rubble in Gaza, and now others sit with gunshot wounds in hospital beds in Vermont. **We must challenge this national narrative that**

rubble in Gaza, and now others sit with gunshot wounds in hospital beds in Vermont. **We must challenge this national narrative that normalizes violence on Palestinians. The violence in Palestine is tied to the violence here, and there can be no discussion of campus well-being that doesn't acknowledge this violence.**

No more empty talks of "both sides"—the bullet that left the barrel of hate is clear. This bullet should ring across all of our community who sympathize with the struggle but find it hard to stand up due to the pressures we feel. Our voices and solidarity are the only things that will continue to protect us.

The students shot were just walking down a street, and **their only crimes were wearing a kuffiyeh and speaking Arabic loud enough for someone to hear.** This story could have been any of the Arabic-speaking students at MIT. **We continue to wear our kuffiyehs proudly and speak our mother tongue.**

We must continue to show that in the face of injustice, more people join in solidarity because the cause of the Palestinian people is a global and just cause. **We remain grounded in the fact that nearly over 15,000 Palestinians have been killed by Israeli occupation forces in the past 50 days of genocide, with thousands more to be uncovered from the rubble.** With the mounting global pressure created by movements, a temporary pause has been accomplished, but we recognize that this is not enough. **We remain resolute for the cause of the liberation of Palestine and a permanent end to the occupation.**

We stand in solidarity with the survivors, their families, and all who are victims of anti-Palestinian, anti-Arab, and Islamophobic violence, and we echo their calls for a full investigation of these shootings as a hate crime. **We will continue to fight until there is a complete end to this violence and until Palestine is free.**

Until liberation,
 MIT Coalition Against Apartheid

Reply to All

Date: Sun, Nov 5, 2023 at 8:48 PM
Subject: My Dissapointment in East Campus
To: ec-discuss <ec-discuss@mit.edu>

Hello,

Coming into East Campus, I had a feeling that this place was different. I felt that EC was a place where people stand up for their beliefs.

I don't know what it was honestly. Maybe it was seeing "FUCK ADMIN" plastered on the walls when I first walked in, or maybe it was the three-hour long emergency house meeting we had to make sure we could all have a say in what this dorm looks like after renovations. Whatever it was, I've unfortunately come to realize that my initial perception of East Campus is not the reality. Time and time again, I've seen defenders of racists, apologists for sexual abusers, and overall, people who think saving their friends' feelings are more important than standing up for what is right.

But many of you have already heard me talk about my experiences with racism and sexual assault in EC, so that's not what I'm talking about right now. Instead, I'm here to talk about East Campus' apathy towards the ongoing massacre of Palestinians.

Over the past several weeks, there have been rallies, walk-outs, and marches, ALL of which have had a very disappointingly small turnout of people who lived in a dorm* where we would be willing to sit in a room for hours deciding on the proper wording for a

To anyone who has remained silent, I ask you this:

What does the Israeli government have to do to Palestinians to make you finally speak out?

Here is a small subset of the atrocities Israel has committed since October 7th alone:

- Murdering almost 10,000 Palestinians. (<https://www.tbsnews.net/hamas-israel-war/gaza-health-ministry-says-war-death-toll-hits-9488-7330667amp>)
- Murdering almost 4,000 Palestinian children. (<https://www.tbsnews.net/hamas-israel-war/gaza-health-ministry-says-war-death-toll-hits-9488-7330667amp>)
- Using 25,000 tons of explosives to indiscriminately bomb Palestinians. (<https://euromedmonitor.org/>)

<https://www.foxnews.com/middle-east/israel-hits-gaza-strip-with-the-entirety-of-two-nuclear-arsenals>
#~:text=This%20means%20the%20destructive,exceed%20360%20square%20meters)

It is important to remember that each of these deaths is not just a number. These are people with stories, loved ones, and aspirations like me and you, but their lives have been cut short by colonialist Israel with funding from the United States. As MIT students, we have an extra responsibility to hold our institution accountable, as our institution has many ties to the military industrial complex. Defense company, Lockheed Martin, has a Seed Fund with MISTI-Israel and MIT shows its complicity with genocide by maintaining this tie. The CAA's demand is to remove this, and we as students can make this happen. Additionally, it is important to acknowledge that this did not start October 7th. There is a 75-year long history of oppression, occupation, and murder that Palestinians have had to endure to lead up to today. How much longer do Palestinians have to endure for you to finally open up?

I wrote this because I know East Campus has the energy to fight against the oppression—I have seen it. If we all brought the energy we spend at house meetings and renovations community meetings, we can help make change. Speak out on social media. Show up to rallies. Call your representatives. Write a letter to Sally. Demand what the people want.

We demand an end to the violence and impunity for genocide. We demand an end to the impunity for Israel's crimes.

We demand a ceasefire. We demand a free Palestine from the river to the sea.

Frequently Asked Questions:

Do you condemn Hamas?

Do you condemn Israel?

Also portraying this as an Israel-Hamas war is ignorant at best and more accurately, malicious. If Hamas was holding hostages in Israel, would the government be cutting off their own essentials, flattening their own houses, and bombing their own civilians? The Israeli government is using Hamas as a scapegoat to kill as many Palestinians as they can and take their land. This is not about Hamas. This is not about retaliation. This is not a war. This is genocide.

What about the hostages?

I want the hostages to have a safe return, but Israel does not. The Israeli government has admitted it "is concerned that further hostage releases by Hamas could lead the political leadership to delay a ground incursion or even halt it midway."

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(<https://www.timesofisrael.com/us-said-concerned-israel-lacks-achievable-goals-for-gaza-op-and-that-idf-not-ready/amp/>)

Israel cares more about massacring Palestinians than they do saving their hostages. Israel has refused to take in hostages Hamas offered to return (<https://www.aljazeera.com/amp/news/2023/10/21/hamas-says-israel-refused-to-receive-2-hostages-israel-calls-it-propaganda>)

Israel has even killed 60 hostages as a direct result of their indiscriminate bombing.

(<https://www.reuters.com/world/middle-east/hamas-armed-wing-more-than-60-hostages-are-missing-due-israeli-airstrikes-2023-11-04/>)

cal to stand with Israel while slyly wishing for the hostages to be freed.

"Injustice anywhere is a threat to justice anywhere." - MLK

There is a reason rallies in support of Palestine have the most diverse group of people you will see, and that is because we all understand what injustice is.

The tactics used to silence, suppress, and kill Palestinians mirror those we see and have seen across history, and we cannot let history repeat itself.

None of us are free until all of us are free.

What if I get doxxed?

The largest rally for Palestine at MIT had 800 people. The November 4th March on Washington had around 300,000 people. They can't doxx us all. Even if they did, you shouldn't want to work for a place that won't accept you if you're against genocide.

What can I do?

The next large demonstration will be on Thursday, Nov 9th there will be a national call to Shut It Down for Palestine. Keep your eye out for more information.

Information about Palestine on social media, repost it and spread the word.

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If you see information about Palestine on social media, repost it and spread the word.

Look for posters across campus with announcements for events (rallies, walkouts, sit-ins).

Call your representatives and tell them you demand a ceasefire and an end to US shoving taxpayer dollars into Israel.

Listen to Palestinian voices and educate yourself.