



ZIONIST ORGANIZATION OF AMERICA

JACOB AND LIBBY GOODMAN ZOA HOUSE

4 EAST 34TH STREET, NEW YORK, N.Y. 10016

(212) 481-1500 | FAX: (212) 481-1515 | EMAIL@ZOA.ORG | WWW.ZOA.ORG

July 20, 2011

BY FAX ([646] 428-3843) AND E-MAIL

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

Dear Mr. Blanchard:

We write on behalf of the Zionist Organization of America (ZOA)¹ to complain about the harassment, intimidation and discrimination that Jewish students are being subjected to at Rutgers, The State University of New Jersey, in violation of Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d. The ZOA has received troubling reports from Jewish students at Rutgers that the campus environment has become increasingly hostile and anti-Semitic, with serious and intolerable results: Jewish students have been threatened and intimidated, their emotional well-being has suffered, and their ability to participate in and benefit from Rutgers' programs and activities has been impaired. The problems that Jewish students have been facing are described in detail below.

Before filing this complaint, the ZOA sent two letters to Rutgers President Richard L. McCormick – the first dated April 6, 2011, and the second dated June 21, 2011 – describing the problems reported to us and urging Rutgers to take the necessary steps to eliminate the hostile environment for Jewish students and ensure that it does not recur, as required by Title VI. President McCormick responded to both letters, in essence conveying that no such steps were needed or required. The ZOA strongly disagrees, as do the Jewish students with whom we are working. We write now to ensure that Rutgers starts living up to its obligations under Title VI and provides a campus environment that is physically and emotionally safe for Jewish students and conducive to learning.

¹ Founded in 1897, the ZOA is the oldest and one of the largest pro-Israel organizations in the United States. Under the leadership of such illustrious presidents as U.S. Supreme Court Justice Louis Brandeis and Rabbi Dr. Abba Hillel Silver, the ZOA has been on the front lines of Jewish activism. With a national membership of over 30,000, chapters throughout the United States, and an office in Israel, the ZOA works to strengthen U.S.-Israel relations; educate the public, elected officials and the media about the truth of the Arab war against Israel; and combat anti-Israel and anti-Jewish bias in the media, textbooks and on campus.

**A Jewish Student Has Been Physically Threatened And Intimidated
By Other Students And Even By A Rutgers Official**

A Jewish student – who will be referred to here as “John Doe” – is one of several Jewish students who have been subjected to a hostile anti-Semitic environment at Rutgers. John Doe, who just completed his junior year, is a columnist for the student paper called the *Targum*, for which he writes on a variety of topics, including Israel when it is relevant to happenings at Rutgers. Simply for exercising his right to free expression in the paper, John Doe has been subjected to ugly anti-Semitic name-calling and other hateful comments, and to physical threats by other students and even by a university official.

On January 31, 2011, the *Targum* published John Doe’s opinion piece entitled “BAKA Must End Hateful Tactics.” In the piece, John Doe criticized BAKA, an anti-Israel student group on campus, for hosting an event called “Never Again for Anyone,” in which Israelis were absurdly and offensively compared to Nazis. After the piece was published, another student at Rutgers posted a message on Facebook in which he directly threatened the Jewish student John Doe with violence: **“As I was reading the [John Doe] column this morning, I realized how Im [sic] a pretty angry person. Id [sic] be happy to see him beat with a crowbar. Violence doesnt [sic] solve problems but it shuts up people who shouldnt [sic] speak”** [emphasis added].

At least seven of the writer’s Facebook friends clicked “like” on this message, indicating their approval of the murderous threat against John Doe. One responded with a chilling threat of his own: **“Or makes them martyrs, furthering the strength behind their beliefs. And skinning them alive so they see the afterlife”** [emphasis added].

Understandably feeling afraid for his physical safety, John Doe sought police protection and removed his contact information from the Rutgers directory, which is normally accessible to the public. John Doe also filed a bias incident report with the Dean of Students. Rutgers represents that victims of bias will be contacted within 24 hours of filing a bias report. But not a single administrator reached out to John Doe for more than a month. John Doe eventually received a cursory e-mail from the Dean of Students of the College Avenue Campus, informing him that there were insufficient grounds to formally charge the student who threatened him. According to the dean, the student who made the murderous threat was simply given “a warning.”

Threats of violence are actionable under the law. Rutgers’ Code of Conduct also specifically prohibits threatening to use force against a person. It is considered to be such a severe infraction that the violator can be suspended or even expelled. It is impossible to understand what more Rutgers could possibly have needed to determine that a student had in fact threatened to use force against John Doe. And it is shocking that the student who threatened to use a crowbar to silence the Jewish student John Doe was simply given a slap on the wrist and issued a warning. Equally shocking is that the university failed to discipline the student who threatened to skin the Jewish student John Doe alive. These were clear and unequivocal threats

against a Jewish Rutgers student, violating the university's Code of Conduct, yet Rutgers did virtually nothing in response.

Rutgers has also failed to respond appropriately to the threats, bullying and intimidation that John Doe has been subjected to by a university official. After John Doe wrote an opinion piece in the *Targum* criticizing the student government's decision to financially support the Palestine Children's Relief Fund – which he had every right to do – Shehnaz Sheik Abdeljaber, the Outreach Coordinator for Rutgers' Center for Middle East Studies, posted offensive anti-Semitic comments about John Doe on Facebook. She referred to the Jewish student John Doe as “**that racist Zionist pig!!!!!!**” (emphasis added). And she tried to incite other Facebook users against John Doe, encouraging them to “Put his name in fb [Facebook] search . . . he has a fb [Facebook] hate page” -- as if celebrating that people were posting hateful messages about John Doe and urging others to find that Facebook page so that they could read the comment and post their own hateful messages.

Ms. Abdeljaber also physically threatened and tried to provoke a physical fight with John Doe. In November 2009, there was a student body meeting about whether the student government should financially support the Palestine Children's Relief Fund. After the meeting, John Doe and a group of his friends were talking to a reporter from the *Targum*. All of a sudden, Ms. Abdeljaber rushed toward them. Directing her comments to the Jewish student John Doe, she yelled such words as, “I'm Palestinian. Do you want to take me on? Do you want to fight? I have thick blood. Try me.” Students reported to us that Ms. Abdeljaber was all riled up; she kept pounding on her chest and pointing to her necklace, which was a silhouette of Israel covered by the Palestinian flag.

John Doe and his friends were stunned. They did not know then the attacker was a university official. They urged Ms. Abdeljaber to calm down, to no avail. Eventually, a university official called the police to diffuse the situation.

Ironically, Ms. Abdeljaber was quoted in the *Targum* last February, condemning bullying, including when it is carried out through the misuse of language. While purporting to take bullying seriously, Rutgers has ignored Ms. Abdeljaber's threatening and anti-Semitic conduct toward John Doe. Ms. Abdeljaber is still identified on Rutgers' Web site as the Outreach Coordinator for the Middle East Studies Center. On information and belief, the university has never investigated her conduct. If it has, the investigation was not a thorough one, since John Doe was the victim of her bullying and intimidation, and yet he was never contacted by the university regarding what he was subjected to.

After the ZOA wrote to President McCormick about Ms. Abdeljaber's misconduct, he responded: “As you are well aware, inappropriate language does not automatically constitute a breach of law or of university policy, nor does an individual's private conduct necessarily constitute a breach of professional responsibility.” The ZOA finds President McCormick's response shocking and unacceptable. If a student wrote an opinion piece in the student paper in favor of gay marriage, the Rutgers administration would never tolerate for one second a university official posting a Facebook message targeting that student and referring to him as

“that faggot pig!!!!!!” or engaging in some other hateful and bigoted name-calling. Likewise, Rutgers would never tolerate a university official referring to an African American student as “that black pig” or a Hispanic student as “that Hispanic pig.” Nor should it.

It is unacceptable that Rutgers would excuse, justify and ignore the conduct of a university official who engaged in anti-Semitic name-calling and who actually physically threatened a Jewish student – as the “Outreach” Coordinator of the Middle East Studies Center, no less! What Jewish or pro-Israel student could ever feel safe and comfortable taking a course in Middle East studies, or working with Shehnaz Sheik Abdeljaber, when she has shown such reprehensible hatred toward Israel and Jews?

**An Admissions Policy To A Campus Event Was Unfairly Imposed And
Selectively Enforced Against Jewish And Pro-Israel Students**

Over the past academic year, the anti-Israel student group called BAKA has been sponsoring and promoting campus programs and events on a regular basis that promote anti-Semitic bigotry and demonize Jews and Israel, creating a hostile environment for Jewish students at Rutgers. Here are just a few examples:

- On November 4, 2010, BAKA sponsored a fundraiser called “U.S. to Gaza,” to support breaking Israel’s legal naval blockade of Gaza. Adam Shapiro, co-founder of a vicious anti-Israel group called the International Solidarity Movement, spoke at the fundraiser, inflaming the audience against Israel by exhorting them to “transform this conflict from one between Israel and the Palestinians . . . to one between the rest of the world and Israel.” Another speaker, Nada Khader, encouraged the audience to support a boycott against Israel, reportedly comparing Zionism – the expression of the Jewish people’s right to live in their historic and religious homeland – to white supremacy. The hostility in the room was unmistakable; every attack against Israel – including the mention of suicide bombings, which have resulted in the murder and maiming of innocent Jewish civilians, and other forms of violence against Israel – was frighteningly greeted with cheering and loud applause.
- On November 16, 2010, BAKA sponsored a speech by Norman Finkelstein, a well-known Holocaust minimizer and Israel-basher.
- On November 19, 2010, BAKA sponsored a showing of the film “Occupation 101,” which inflames hatred of Jews and Israel by promoting the incendiary falsehood that the Palestinian Arabs are innocent victims and Israelis their brutal occupiers and oppressors.
- On December 5, 2010, BAKA co-sponsored a “Palestine Culture Festival” that celebrated the Palestinian “legacy of resistance,” – which is code for the endorsement of suicide bombings, terrorist attacks, and the murder of Israeli Jews.
- On January 20, 2011, BAKA sponsored a “Gaza vigil” to commemorate the so-called “massacres” of Palestinian Arabs in Gaza, another inflammatory falsehood that incites

hatred of Jews and Israel. The notion that there were any “massacres” is false; many if not most of the people killed were not innocent civilians but rather operatives for the terrorist group Hamas, whose charter calls for killing Jews and destroying Israel.

- On March 1, 2011, BAKA sponsored a panel discussion entitled “Israel, the Apartheid Analogy and the Boycott, Divestment, and Sanctions (BDS) Movement.” The event incited hatred of Israel by falsely and offensively comparing Israel’s treatment of its Arab citizens to how South Africa treated blacks under the apartheid system, and it promoted harming Israel by boycotting Israeli products and cultural exchanges.
- On March 2, 2011, BAKA erected a so-called “apartheid wall” – falsely representing the security fence that Israel has been forced to construct to protect innocent Israeli civilians from terrorists entering Israel. BAKA’s wall was set up outside one of the main dining halls on campus, so that it was virtually impossible for students to avoid. Students residing adjacent to the dining hall were literally forced to walk around the wall in order to exit their dormitory toward College Avenue. These students in particular were unable to escape the wall and its hateful and false propaganda messages about Jews and Israel.

On January 29, 2011, BAKA organized another program entitled “Never Again for Anyone,” which falsely and outrageously analogized the Nazis’ treatment of the Jews to Israel’s policies and practices toward the Palestinian Arabs. When Jewish students heard about this program, they were understandably upset and outraged, and planned a peaceful response. They would attend the event, sit respectfully, and then at some point, stand up, reveal the tee shirts underneath their jackets – bearing the message, “Don’t Politicize the Holocaust” – and then quietly walk out. But most Jewish students were prevented from attending because they were subjected to a selective admissions policy that was discriminatory and anti-Semitic.

BAKA had advertised the event on Facebook and Craigslist, representing that it would be “free and open to the public.” The Craigslist ad said, “\$5 - \$20 suggested donation on entry.” At the event itself, a sign was prominently displayed, suggesting a voluntary contribution of \$5.00 to \$20.00, but no required admission fee.

But as people began to fill the lobby and so many of them – based on their signs and attire – were Jewish and/or supporters of Israel, the admissions policy was abruptly changed and a mandatory admission fee of \$5.00 was announced. Students and community members objected, pointing to BAKA’s own representations that the event would be free. BAKA members were handling the logistics of the event, including manning the doors and sign-in lists. Not one BAKA representative ensured that the admissions policy was implemented as represented and that students could gain admittance without paying a mandatory fee.

Making matters worse, the new and sudden admissions policy was not enforced fairly and equally. BAKA members and others who were deemed friendly to BAKA’s cause – by their attire and signs, for example – were observed getting in for free. An unusually large number of students were given green wristbands and permitted to enter without charge, allegedly because they were “volunteering” at the event. To several witnesses, there appeared to be an awful lot of

volunteers; handing out the wristbands seemed a ruse to enable some students, but not others, to attend the event without charge.

In contrast, those who were perceived as Jewish and pro-Israel had to pay to be admitted. Many refused to support the event or its organizers and thus were effectively kept out of the event – which was plainly the organizers' goal. When some Jewish students saw that members of BAKA were getting into the event for free, they tried to join BAKA. Rutgers' policies are clear that student organizations cannot deny membership on the basis of religion, ancestry, or other category protected by law. But BAKA refused to admit the Jewish students to their group, thereby keeping them out of the event unless they were willing to pay to get in.

The reason for the change in the admissions policy was crystal clear. Sara Kershner – founder of an outside group, the International Jewish Anti-Zionist Network, which co-sponsored the event – reportedly instructed BAKA students to destroy the signs at the event that indicated that there would be no admission fee. Reportedly, she said, "We need to start charging because 150 Zionists (code for Jews) just showed up!" Ms. Kershner also told the student volunteers to allow anyone who appeared to be a supporter of the program's agenda into the event for free. Inside the event, Ms. Kershner reportedly told the audience, "When we saw that there were . . . Zionists (again, code for Jews) outside, we decided to charge." In short, Jews and supporters of Israel were deliberately excluded from an event that was supposed to be free and open to everyone. BAKA endorsed and implemented this discriminatory and anti-Semitic policy.

The day after "Never Again for Anyone," Rutgers issued a statement "to correct a number of assertions that have appeared in some published reports of the event." Given the timing of the statement, it was obvious that Rutgers had done little if any investigation into what had occurred on January 29th. The university stated that it was not the sponsor of the event. It identified American Muslims for Palestine (another outside group) as having leased a hall from the university and paid the cost of the event. It stated that the organizers hired two officers to assist with security and crowd control. The university also noted that "[t]he organizers had originally advertised a suggested donation of five to twenty dollars upon entry. At the event, the organizers chose to impose a five dollar entrance fee on attendees."

Rutgers' statement ignored the fact that BAKA had engaged in false advertising in violation of university policies, when it advertised the event as free and open to the public, and then later endorsed and implemented an admission fee. The university's statement ignored the fact that the admissions policy was selectively enforced against Jews and Israel supporters and thus was discriminatory and anti-Semitic. And the statement ignored and did not condemn any of the inflammatory and anti-Semitic falsehoods that were promoted at the event to incite hatred of Jews and Israel. Since January 30th, Rutgers has not issued any other statements about what occurred at the event or how it was handled, or even whether the matter is under investigation. To all appearances, Rutgers has simply pushed the matter under the rug, at the expense of Jewish students who were already viewing the campus as increasingly hostile to them and to Israel. The university's conspicuous indifference to their concerns only served to intensify the climate of hostility.

After “Never Again for Anyone,” several Jewish student leaders tried to work with university officials to address the many problems they were facing. On February 4, 2011, they met with Gregory Blimling, Vice President for Student Affairs, and Kerri Willson, Director of Student Involvement, to discuss what happened at the “Never Again for Anyone” event, as well as their general concerns about the hostile campus environment affecting them and other Jewish students.

The meeting was not productive. Dr. Blimling set the tone for the meeting when he informed the students that he and other university officials had already heard about what had happened on January 29th; he refused to address the issues surrounding the January 29th event. To the students, this was a shockingly uncaring response; they had come to discuss their concerns about how the event had been conducted, and now their concerns were being completely ignored. When one of the students tried to explain why the campus environment felt so hostile to many Jewish students, Dr. Blimling ignored that, too, and changed the subject. Instead, he brought up the problem of Islamophobia. He described how Muslims are portrayed on Fox News, and he talked about the objections that were made to building a mosque near Ground Zero in Manhattan— none of which had any relevance to the reason for the meeting or to the Jewish students’ own legitimate grievances about the campus climate. Dr. Blimling also repeatedly brought up the grievances of the BAKA students. To the Jewish students at the meeting, Dr. Blimling’s comments were insensitive, misguided and irrelevant. They made the students feel as if they were the aggressors against the BAKA students, and that they had engaged in hostile conduct toward Muslims, when nothing could be further from the truth.

At the meeting, Kerri Willson did not respond any more constructively to Jewish students’ concerns. One of the students present had previously filed a bias complaint and had been led to believe by Dean Cheryl Clarke of the Bias Prevention and Education Committee that her complaint would be addressed at the February 4th meeting with Ms. Willson. But when the student tried several times to bring up the circumstances that led her to file a bias complaint, Ms. Willson stopped her each time. Again, the subject was changed; Ms. Willson repeatedly brought up BAKA’s complaints, suggesting in her tone and manner that the Jewish students were the aggressors and the BAKA students were the victims. Ms. Willson also referred to a speaker whom Hillel was purportedly bringing to the campus and whom the BAKA students found offensive. Ms. Willson said that she had assured the BAKA students that this speaker would not be coming to campus. In fact, neither Hillel nor any other Jewish/pro-Israel campus group ever had any plan to bring this speaker to Rutgers. But that is beside the point. Because to Jewish students, who had been forced to endure one hateful anti-Semitic speaker after the next – all sponsored by BAKA – without one word of condemnation from Ms. Willson or any other Rutgers administrator, it was difficult to believe that Ms. Willson now appeared to be making a judgment about the acceptability of a speaker that Hillel might be considering bringing to the campus.

There was supposed to be follow-up after the meeting on February 4th, but that never happened. None of the students heard from Dr. Blimling, Ms. Willson, or any other university officials regarding how their concerns would be addressed. To the ZOA’s knowledge, the university has not resolved any of the bias complaints that Jewish students have filed. At the end

of the meeting, Dr. Blimling and Ms. Willson committed to organizing a meeting among the Jewish student leadership and the BAKA leadership. To date, they have not done so. Last March, Dr. Blimling wrote to the professional leadership of Chabad and Rutgers Hillel about the campus tensions. He emphasized Rutgers' commitment to the right to free speech, and also emphasized the need for members of the university community to exercise that right responsibly, without "contempt, open hostility, or personal attacks." But that is exactly the kind of conduct that BAKA engages in, contributing to the hostile environment for Jewish students. Indeed, BAKA is so contemptuous that it reportedly refuses even to meet with the Jewish student groups.

One of the students who had filed a bias report notified Dean Clarke of the Bias Prevention and Education Committee that her report had not been addressed at the February 4th meeting, and she reached out to the Dean for help. None was forthcoming. When the student suggested that she meet jointly with Dean Clarke and Kerri Willson, Dean Clarke responded with indifference, essentially ignoring the complaint by saying, "if kerri [sic] has time. But if we are not going to cover any new ground, what will be the use. We will not say anything you will agree with." There was no apparent interest or concern in ensuring that a Jewish student's report of bias was constructively addressed and resolved.

When the ZOA raised these concerns with President McCormick, he claimed that the university is aware of each complaint filed by students and "and has conducted appropriate investigations." That is news to those students who never met with an administrator to discuss and resolve their particular complaints and concerns. President McCormick also responded by explaining that Rutgers' ability to "discipline its students for intolerant statements" is limited by the First Amendment. But the ZOA had not asked that students be disciplined for "intolerant statements." Rutgers' policies prohibit false advertising and engaging in discriminatory conduct. The ZOA urged Rutgers to complete a thorough investigation of what occurred at BAKA's "Never Again for Anyone" event, and to enforce its own policies by disciplining violators of university policies.

Jewish Students Are Being Subjected To Hostility In The Classroom

Jewish students are also facing harassment and intimidation in the classroom. They have reported that Middle East studies courses are so unfairly biased against Israel that they are too uncomfortable or intimidated to enroll in these courses. When they do enroll, they go in expecting that the professor will be biased against Israel – it is simply a question of just how ugly the bias will be. The anti-Israel bias has made students reluctant and even intimidated to speak up and say that they support Israel, both in and out of the classroom.

One Jewish student reported that even when a Middle East studies professor tries to "stay neutral," the "mob mentality" of the class to viciously attack Israel eventually takes over. This student thus avoided many Middle East studies courses that he otherwise would have taken. In this student's view, the Middle East Studies Center is run more as "a platform for BAKA" than as an academic department. Indeed, the Center almost always sponsors BAKA's events, many of which are anti-Israel.

Reportedly, almost every event sponsored by the Middle East Studies Center starts with a speech demonizing Israel and deploring the suffering of Palestinian Arabs – even when the event itself has nothing to do with the Arab-Israeli conflict. For example, at a Middle East Studies Center event celebrating Arab music, introductory speeches were made by several students describing the oppression of the Palestinian Arabs and their brutal “occupation” by Israel. Each of these students cited Shehnaz Sheik Abdeljaber – coordinator of the Center – as their inspiration. While Jewish students are not required to attend such events, there is implicit pressure to do so, because students are typically given extra credit in their Middle East studies courses for attending them.

Rutgers Knows About The Anti-Semitic Hostile Environment And Its Harmful Impact On Jewish Students

Rutgers has been on notice for many months that there is an anti-Semitic hostile environment on campus, which is having unacceptably harmful effects on students’ physical and emotional well-being. In a piece published in the *Targum* on February 7, 2011, the Rutgers Hillel reported that “Jewish students have been threatened with violence, made to feel unsafe in their dorms and sought formal counseling because of physical threats as well as emotional and verbal attacks on them. This includes individuals who BAKA has publicly targeted.”

Hillel’s report is consistent with the information that the ZOA has received from Jewish students. One student reported that he is afraid to wear anything with the Israel Defense Forces logo on it. He is even uncomfortable discussing on campus his experience of studying abroad in Israel. Another student reported not feeling comfortable wearing anything with Hebrew on it, or anything “plainly Jewish.” Yet another student described a fear of the BAKA protesters, characterizing it as a “constant worry.” Another student described feeling physically unsafe going to events that BAKA sponsors, and with good reason. He has been pointed at and surrounded at BAKA events. When he tried to videotape events so that he could expose the hateful falsehoods that are being promoted on campus about Jews and Israel, BAKA members forced him to leave. Another Jewish student went to a BAKA meeting wearing a kippah (skullcap) and was told to leave. Students describe being afraid even to say on campus that they support Israel. One Jewish student said that based on BAKA’s conduct in specifically targeting her, she could not leave her house, and was so riddled with anxiety that she could not eat or sleep.

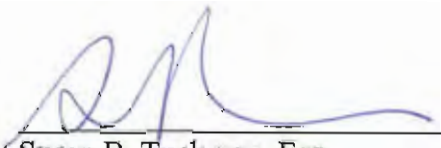
When the ZOA apprised Rutgers President McCormick of the many problems that Jewish students are facing, we urged him to implement a systemic response, consistent with the Office for Civil Rights’ Dear Colleague letter of October 26, 2010. Specifically, the ZOA recommended that President McCormick (1) meet with Jewish students and listen to their concerns; (2) speak out and publicly condemn anti-Semitism in all its forms whenever it occurs at Rutgers, including when anti-Israel and anti-Zionist sentiment crosses the line into anti-Semitism, and when lies about Israel are promoted on campus that are inciting hatred of Jews; (3) investigate Shehnaz Sheik Abdeljaber’s conduct thoroughly and, if the allegations against her are substantiated, fire her; (4) investigate thoroughly and resolve fairly each and every bias report that Jewish students have made; (5) investigate thoroughly what occurred at the “Never

Again for Anyone" event and determine whether BAKA should be disciplined for violating university policies; (6) undertake a comprehensive review of university course descriptions and course materials to correct the anti-Israel bias that permeates the classroom, which is creating a hostile learning environment for Jewish students; (7) provide faculty and administrators with training to recognize and address anti-Semitic incidents; and (8) create programs to educate students about anti-Semitism in all of its manifestations

Most of these steps were specifically recommended by the Office for Civil Rights in its Dear Colleague letter. All of the steps are reasonably calculated to eliminate the anti-Semitic hostility at Rutgers and ensure that it does not recur, without impinging on any protected rights. President McCormick has refused to take any of these steps.

We respectfully urge you to investigate the anti-Semitic hostility at Rutgers, which reportedly has been a longstanding problem, and hold the university accountable under Title VI of the Civil Rights Act of 1964. If you have questions or need additional information, please contact us at (212) 481-1500. The ZOA would be pleased to provide you with copies of our correspondence with Rutgers, and other evidence in support of our claims. In addition, several current and former Rutgers students are ready and willing to talk to you about their experiences on campus.

Very truly yours,


Morton A. Klein
National President
Susan B. Tuchman, Esq.
Director, Center for Law and Justice