



ZIONIST ORGANIZATION OF AMERICA

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SUSAN B. TUCHMAN, ESQ.  
Director of the Center for Law and Justice

December 23, 2011

BY E-MAIL

Office of the Deputy Assistant Secretary for Enforcement  
U.S. Department of Education  
Office for Civil Rights  
400 Maryland Avenue, S.W.  
Washington, D.C. 20202

Re: Case No. 02-11-2157 (Rutgers University)

Dear Sir or Madam:

The Zionist Organization of America (ZOA) hereby appeals the Office for Civil Rights' determination not to investigate three allegations in the ZOA's complaint against Rutgers University. Filed with the Office for Civil Rights (OCR) on July 20, 2011, the ZOA's complaint alleges that Jewish students at Rutgers have been subjected to a pattern of anti-Semitic harassment, intimidation and discrimination, which university officials have failed to address, in violation of Title VI of the Civil Rights Act of 1964. In a letter dated October 26, 2011, OCR notified the ZOA that while several allegations of the complaint merited investigation, three allegations were "not appropriate for investigation" because the ZOA had not provided OCR with the names of students who could support those allegations; with respect to one of the three allegations, OCR stated that the ZOA had not provided the dates on which the harassing conduct occurred.

OCR's determination not to investigate the three allegations should be reversed, because it is based on an incomplete and inaccurate analysis of the facts. The facts show that OCR never asked for students' names or the dates of harassment relating to the three allegations at issue in this appeal; if OCR was seeking that information, it did not clearly convey the request to the ZOA. Had the names of students been requested, the ZOA would have provided them, in the same way that the ZOA responded with respect to all the other information that OCR sought.<sup>1</sup> As to the dates on which the harassing conduct occurred, OCR likewise never requested the information. In any event, the time frame is evident from the ZOA's complaint itself; all of the events that created a hostile environment for Jewish students were described in detail in the complaint, including the dates when they occurred. The complaint also specifically states that the hostile environment arose during the 2010-2011 academic year.

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<sup>1</sup> After the ZOA received OCR's determination letter, it immediately offered students' names to OCR, but OCR representatives indicated that an appeal (or a new complaint) needed to be filed.

In this letter, the ZOA will provide the names of students who can speak to the three allegations at issue in the appeal.<sup>2</sup> We respectfully urge OCR to reverse its determination and proceed with an investigation of all of the allegations of the ZOA's Title VI complaint. The rights of Jewish students should not be unfairly prejudiced and impaired based on circumstances that are so easily remedied.

The Allegations that OCR Decided Not to Investigate and the Reasons Given for its Decision

In its letter to the ZOA dated October 26, 2011, OCR decided that the following three allegations were not appropriate for investigation, and gave its reasons for each:

- (1) The ZOA's allegation that a student group called BAKA had created a hostile environment for Jewish students on the basis of their national origin, by holding anti-Israel events and forums.

OCR's determination letter states that the ZOA "provided no names of students who complained to the University that BAKA subjected them to a hostile environment on the basis of their national origin and by holding these events and forums."

- (2) The ZOA's allegation that Jewish students are subjected to a hostile environment in Middle East studies courses at the University.

OCR's determination letter states that the ZOA "only provided OCR with one example of a student who was allegedly subjected to this harassment (Student 2); however, you did not provide OCR with the name of Student 2 or the dates on which the alleged harassing conduct occurred."

- (3) The ZOA's allegation that Jewish students are generally subjected to a hostile anti-Semitic environment on campus.

OCR's determination letter states that the ZOA "did not provide the names of any students you described or the dates of any alleged incidents."

OCR's Decision is Incorrect and Should Be Reversed

The ZOA did not provide the names of the students relating to the above three allegations for one reason: OCR did not request the information, and if it did seek the information, the request was not clearly conveyed. This conclusion is supported by the facts.

All of the ZOA's exchanges with OCR confirm the ZOA's understanding and belief that OCR was seeking information relating to only one of the allegations of the complaint – that Jewish students had filed bias reports with Rutgers, which the University did not adequately

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<sup>2</sup> Not all these students themselves complained to the university about the hostile environment. But Rutgers was on notice of the problem, from students and from the ZOA. (The ZOA's letter exchange with the president of Rutgers, which occurred before the ZOA filed its Title VI complaint, has already been furnished to OCR.)

address. In a telephone conversation on August 30, 2011, between Emma Kim of OCR and Susan Tuchman of the ZOA, Ms. Kim requested that students who filed bias reports sign consent forms, which would authorize OCR to obtain information about their bias reports from Rutgers. Ms. Kim explained that the information was needed so that OCR could decide whether the bias-report allegations should be considered individually or as being asserted on behalf of a class of Jewish students. On the same date, Ms. Kim e-mailed a link to OCR's consent forms.

On September 7, 2011, Ms. Kim e-mailed Ms. Tuchman to inform her that "assuming that consent forms aren't ready today, I will be emailing you a 20-day request shortly . . . This will be a notification that we are requesting the consent forms as soon as possible, but no later than 20 days from the date of my request . . . ." (See Exhibit 1, attached hereto.)

Ms. Kim's formal request for the consent forms followed. Her e-mail stated, in relevant part:

As discussed in our telephone conversation on August 30, 2011, in order for OCR to continue processing your complaint, OCR is requesting names and consent forms for students referenced in your complaint. Accordingly, we are requesting that you provide this information as soon as possible, but no later than twenty (20) days from the date of this email or by September 27, 2011, or your allegations may be closed.

See Exhibit 2, attached hereto (emphasis added).

Ms. Kim's e-mail specifically invited Ms. Tuchman to contact her (or Diane Castro, her colleague at OCR) with any questions. Ms. Tuchman followed up right away, to clarify that the consent forms were being sought only from those Jewish students who had filed bias reports with Rutgers.

In her e-mail to Ms. Kim, Ms. Tuchman wrote, in relevant part:

It was my understanding from our phone conversation on August 30<sup>th</sup> that failure to provide consent forms would mean that only the allegations relating to the university's failure to respond adequately to bias reports that Jewish students had filed might be dismissed. The remaining allegations would still be intact, and OCR would decide whether it would be exercising jurisdiction over those remaining allegations. If I misunderstood, I would appreciate your letting me know.

See Exhibit 3, attached hereto (emphasis added).

Ms. Kim responded by confirming Ms. Tuchman's understanding, stating, "That is correct. If students' consent forms are not provided, OCR will still continue to evaluate the remaining allegations, and determine whether we can proceed to investigation on those" (emphasis added). (See Exhibit 4, attached hereto.)

Accordingly, the ZOA began providing consents to OCR from those students whose bias reports were not adequately addressed by Rutgers.<sup>3</sup>

On September 15, 2011, Ms. Kim e-mailed Ms. Tuchman to ask for more information about one student's bias report, after the ZOA had submitted the student's consent. Ms. Kim also asked, "Do you anticipate that you will provide any other students' consent forms to OCR?" (See Exhibit 5, attached hereto.)

In response, Susan Tuchman provided the additional information about the student's bias report. Ms. Tuchman again confirmed her understanding that OCR was seeking consent forms only from students who had filed bias reports that the University had not adequately addressed. Her e-mail to Ms. Kim stated, in relevant part:

I do anticipate providing additional consent forms. But I understood that the need for the consent forms was so that OCR could decide whether there was a basis to exercise jurisdiction over that part of the ZOA's complaint alleging the university's failure to respond adequately to students' bias reports. Now that OCR has two consent forms from students whose complaints were not adequately responded to by Rutgers, wouldn't that be sufficient for OCR to make a jurisdiction determination?

See Exhibit 6, attached hereto.

Ms. Kim's response did not correct Ms. Tuchman's understanding. It in fact corroborated Ms. Tuchman's understanding, because it focused only on the request for information necessary to evaluate the ZOA's bias-report allegations, and not the other allegations of the ZOA's complaint. Ms. Kim wrote, in relevant part:

We are currently in the process of determining whether we can accept the ZOA's allegation that the University failed to respond to students' bias reports as a class (i.e., that the University did not respond to any bias complaints from Jewish students). Alternatively, we need to determine whether we need to investigate the allegation individually only regarding those specific students whose information you provided. The determination as to whether a class-wide allegation is sufficiently supported is made by the office on a case-by-case basis, so it is not possible for me to say at this point whether the two students you provided would be sufficient to open the allegation for investigation; however, in general, if a complainant can provide more specific examples, it could potentially provide greater support for the class-wide allegation.

Exhibit 7, attached hereto.

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<sup>3</sup> To make it easier for students to give their consent, OCR permitted students to e-mail their consent using the language in the consent form, rather than actually sign and return the consent forms themselves.

Following that e-mail, the ZOA provided additional consents from Jewish students at Rutgers who had filed bias reports. Each of Susan Tuchman's subsequent e-mails referencing the consent forms also included a reference specifically to students who had filed bias reports – again reflecting the ZOA's understanding that this was the information that OCR was seeking. In an e-mail to Emma Kim on September 27, 2011, Ms. Tuchman stated:

I understand that OCR wanted all the consent forms by today. There's one student whose consent form I haven't been able to obtain yet. In addition, there may be other students coming forward who may have filed bias reports that weren't appropriately responded to. I hope that OCR will permit me to submit additional consent forms, particularly if OCR decides that it has jurisdiction over the bias report allegations (based on the consents that have already been submitted) and proceeds with an investigation.

See Exhibit 8, attached hereto.

The communications between the ZOA and OCR are consistent: They reflect the ZOA's understanding and belief that OCR was seeking information about the bias-report allegations only, in order to determine whether there was sufficient evidence to proceed with an investigation into those allegations on behalf of a class of Jewish students at Rutgers. OCR never corrected that understanding and belief and, in fact, validated it.

Had OCR clearly conveyed that it was also seeking student names relating to other allegations of the complaint, the ZOA surely would have provided them. The record shows that whatever information OCR requested, the ZOA provided:

- When OCR requested a completed consent form from the student identified in the ZOA's complaint as "John Doe," the ZOA provided it. (See Exhibit 9, attached hereto.)
- When OCR requested the ZOA's letter exchange with Rutgers President Richard McCormick, which preceded the filing of the Title VI complaint, the ZOA provided it. (See Exhibit 10, attached hereto.)
- When OCR requested the anti-Semitic Facebook message that a university official posted about "John Doe," the ZOA provided it and also furnished additional information relating to the incident. (See Exhibit 11, attached hereto.)
- When OCR requested information about the physical threats were made against "John Doe" on Facebook, including an image of the threats, the ZOA provided it. (See Exhibit 11, attached hereto.)
- When OCR asked for more information about the bias report filed by one particular Jewish student, the ZOA provided it. (See Exhibits 6 and 12, attached hereto.)

The ZOA is equally ready to provide the names of students with information supporting the three allegations at issue in this appeal.<sup>4</sup> (Some of these students have already been identified to OCR in connection with OCR's request for the names of students who filed bias reports.):

Allegation #1, above (that the student group BAKA created a hostile environment):

[REDACTED]  
[REDACTED] (consent form already submitted)  
[REDACTED]  
[REDACTED]  
[REDACTED] (consent form already provided)  
[REDACTED]  
[REDACTED]

Allegation #2, above (hostile environment in the classroom):

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Allegation #3, above (general hostile environment):

[REDACTED]  
[REDACTED] (consent form already submitted)  
[REDACTED]  
[REDACTED]  
[REDACTED] (consent form already provided)  
[REDACTED]  
[REDACTED]  
[REDACTED]

In addition to the above students [REDACTED]  
[REDACTED] can provide information to OCR in support of the above three allegations. The ZOA's Title VI complaint references Hillel's report in the Rutgers student paper on February 7, 2011, 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."

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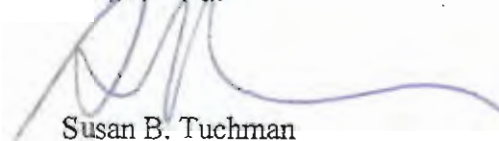
<sup>4</sup> Disclosure of these names to OCR is not authorizing OCR to reveal students' identities to other persons.

Principles of Fairness and Justice Require that OCR Reverse its Determination

For the foregoing reasons, the ZOA respectfully urges OCR to reverse its determination and proceed with an investigation of the allegations of the complaint that (1) the Rutgers' student group BAKA created a hostile environment for Jewish students; (2) Jewish students are being subjected to a hostile environment in Middle East studies courses at Rutgers; and (3) Jewish students are generally subjected to a hostile, anti-Semitic environment on campus. The record shows that OCR did not request information about these allegations. If OCR was seeking the information, the request for it was not clearly conveyed. There is no question from the record that the ZOA was responsive and forthcoming with respect to all the other information that OCR asked for.

Principles of fairness and justice require that OCR's determination be reversed. Jewish students have already been harmed by the hostile anti-Semitic environment they have faced at Rutgers. Their rights should not be further impaired as a result of circumstances that can be – and have been – easily fixed.

Respectfully,



Susan B. Tuchman

From: Kim, Emma [mailto:Emma.Kim@ed.gov]  
Sent: Wednesday, September 07, 2011 4:17 PM  
To: Susan Tuchman  
Cc: Castro, Diane  
Subject: FW: Rutgers University, Case No. 02-11-2157

Hi Susan--assuming the consent forms aren't ready today, I will be emailing you a 20-day request shortly, as according to our procedures. This will be a notification that we are requesting the consent forms as soon as possible, but no later than 20 days from the date of my request (which will be today).

If they do come in during the next week, if you could forward them to both Diane Castro (diane.castro@ed.gov) and myself, I would greatly appreciate it.

Thank you very much.

Sincerely,

Emma Kim  
Senior Compliance Team Attorney  
Office for Civil Rights - Region II  
U.S. Department of Education  
32 Old Slip, 26th Floor  
New York, New York 10005  
tel: 646-428-3824  
fax: 646-428-3843  
Emma.Kim@ed.gov



From: Kim, Emma [mailto:Emma.Kim@ed.gov]  
Sent: Wednesday, September 07, 2011 4:21 PM  
To: Susan Tuchman  
Subject: Rutgers University, Case No. 02-11-2157

Dear Ms. Tuchman:

As discussed in our telephone conversation on August 30, 2011, in order for OCR to continue processing your complaint, OCR is requesting names and consent forms for students referenced in your complaint. Accordingly, we are requesting that you provide this information as soon as possible, but no later than twenty (20) days from the date of this email or by September 27, 2011, or your allegations may be closed.

You may send us this information via email, fax or mail. Please feel free to contact myself or Diane Castro, Equal Opportunity Specialist (tel: 646-428-3808, email: [diane.castro@ed.gov](mailto:diane.castro@ed.gov)) with any questions.

Thank you for your assistance in this matter.

Sincerely,

Emma Kim  
Senior Compliance Team Attorney  
Office for Civil Rights - Region II  
U.S. Department of Education  
32 Old Slip, 26th Floor  
New York, New York 10005  
tel: 646-428-3824  
fax: 646-428-3843  
[Emma.Kim@ed.gov](mailto:Emma.Kim@ed.gov)

From: Susan Tuchman [mailto:STuchman@zoa.org]  
Sent: Wednesday, September 07, 2011 5:06 PM  
To: Kim, Emma  
Subject: RE: Rutgers University, Case No. 02-11-2157

Dear Ms. Kim,

Thank you for your e-mail.

It was my understanding from our phone conversation on August 30th that failure to provide consent forms would mean that only the allegations relating to the university's failure to respond adequately to bias reports that Jewish students had filed might be dismissed. The remaining allegations would still be intact, and OCR would decide whether it would be exercising jurisdiction over those remaining allegations. If I misunderstood, I would appreciate your letting me know.

Many thanks.  
Susan Tuchman

Susan B. Tuchman, Esq.  
Director, Center for Law and Justice  
Zionist Organization of America  
4 East 34th Street  
New York, NY 10016  
(212) 481-1500

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EXHIBIT 3

From: Kim, Emma [mailto:Emma.Kim@ed.gov]  
Sent: Wednesday, September 07, 2011 5:17 PM  
To: Susan Tuchman  
Cc: Castro, Diane  
Subject: RE: Rutgers University, Case No. 02-11-2157

Dear Ms. Tuchman:

That is correct. If students' consent forms are not provided, OCR will still continue to evaluate the remaining allegations, and determine whether we can proceed to investigation on those.

Please feel free to contact us with any other questions.

Sincerely,

Emma Kim  
Senior Compliance Team Attorney  
Office for Civil Rights - Region II  
U.S. Department of Education  
32 Old Slip, 26th Floor  
New York, New York 10005  
tel: 646-428-3824  
fax: 646-428-3843  
Emma.Kim@ed.gov

EXHIBIT 4

From: Kim, Emma [mailto:Emma.Kim@ed.gov]  
Sent: Thursday, September 15, 2011 10:45 AM  
To: Susan Tuchman; Castro, Diane  
Subject: RE: Rutgers University, Case No. 02-11-2157

Dear Susan:

Thank you for the information. We have additional questions, as follows:

- What was the subject of [REDACTED]'s bias report filed with the university? Was it about the BAKA event on January 29, 2011, or did it raise other allegations?
- Do you anticipate that you will provide any other students' consent forms to OCR?

We look forward to hearing from you.

Sincerely,

Emma Kim  
Senior Compliance Team Attorney  
Office for Civil Rights - Region II  
U.S. Department of Education  
32 Old Slip, 26th Floor  
New York, New York 10005  
tel: 646-428-3824  
fax: 646-428-3843  
Emma.Kim@ed.gov

From: Susan Tuchman [mailto:STuchman@zoa.org]  
Sent: Thursday, September 15, 2011 12:17 PM  
To: Kim, Emma  
Cc: Castro, Diane  
Subject: RE: Rutgers University, Case No. 02-11-2157

Dear Emma,

I believe that [REDACTED]'s bias report focused on what happened to [REDACTED] at the BAKA event on January 29, 2011, but I will confirm that with [REDACTED] and get back to you. [REDACTED] also was one of the students at the meeting with university administrators on February 4, 2011 (described in the complaint,) at which the students tried (unsuccessfully) to resolve their complaints of anti-Semitic bias on the campus that went beyond what occurred at that BAKA event.

I do anticipate providing additional consent forms. But I understood that the need for the consent forms was so that OCR could decide whether there was a basis to exercise jurisdiction over that part of the ZOA's complaint alleging the university's failure to respond adequately to students' bias reports. Now that OCR has two consent forms from students whose complaints were not adequately responded to by Rutgers, wouldn't that be sufficient for OCR to make a jurisdiction determination?

Thank you for your help.  
Susan

Susan B. Tuchman, Esq.  
Director, Center for Law and Justice  
Zionist Organization of America  
4 East 34th Street  
New York, NY 10016  
(212) 481-1500

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From: Kim, Emma [mailto:Emma.Kim@ed.gov]  
Sent: Thursday, September 15, 2011 1:57 PM  
To: Susan Tuchman  
Cc: Castro, Diane  
Subject: RE: Rutgers University, Case No. 02-11-2157

Dear Ms. Tuchman:

Thank you for your response. We are currently in the process of determining whether we can accept the ZOA's allegation that the University failed to respond to students' bias reports as a class (i.e., that the University did not respond to any bias complaints from Jewish students). Alternatively, we need to determine whether we need to investigate the allegation individually only regarding those specific students whose information you provided.

The determination as to whether a class-wide allegation is sufficiently supported is made by the office on a case-by-case basis, so it is not possible for me to say at this point whether the two students you provided would be sufficient to open the allegation for investigation; however, in general, if a complainant can provide more specific examples, it could potentially provide greater support for the class-wide allegation.

We look forward to hearing from you regarding [REDACTED]'s additional information, and any other consent forms.

Sincerely,

Emma Kim  
Senior Compliance Team Attorney  
Office for Civil Rights - Region II  
U.S. Department of Education  
32 Old Slip, 26th Floor  
New York, New York 10005  
tel: 646-428-3824  
fax: 646-428-3843  
Emma.Kim@ed.gov

From: Susan Tuchman  
Sent: Tuesday, September 27, 2011 5:50 PM  
To: Kim, Emma (Emma.Kim@ed.gov)  
Cc: diane.castro@ed.gov  
Subject: Rutgers University, Case No. 02-11-2157

Hi, Emma,

I understand that OCR wanted all the consent forms by today. There's one student whose consent form I haven't been able to obtain yet. In addition, there may be other students coming forward who may have filed bias reports that weren't appropriately responded to. I hope that OCR will permit me to submit additional consent forms, particularly if OCR decides that it has jurisdiction over the bias report allegations (based on the consents that have already been submitted) and proceeds with an investigation.

I am leaving the office for the remainder of the week for the Rosh Hashanah holiday. I will be in the office next Monday.

Many thanks.  
Susan

Susan B. Tuchman, Esq.  
Director, Center for Law and Justice  
Zionist Organization of America  
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(212) 481-1500

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From: Susan Tuchman  
Sent: Tuesday, August 09, 2011 4:44 PM  
To: diane.castro@ed.gov  
Subject: Rutgers University, Case No. 02-11-2157  
Hi, Diane,

It was a pleasure to speak with you this afternoon. As we discussed, I've attached the completed Consent Form – For Use of Personal Information, and have signed it on behalf of one of the students (with his authorization) who has faced a hostile anti-Semitic environment at Rutgers. He is the student identified as "John Doe" in the complaint that the Zionist Organization of America (ZOA) filed. He is not the only student involved in the complaint. Several other students have reported problems to us and support this complaint.

I've also attached the letter that I sent on July 29, 2011, to Rafael Hernandez of OCR regarding the Consent Form. If you need any other info to move forward, please let me know.

I look forward to talking with you on Thursday at 2:30.

Thanks.  
Susan Tuchman

Susan B. Tuchman, Esq.  
Director, Center for Law and Justice  
Zionist Organization of America  
4 East 34th Street  
New York, NY 10016  
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From: Susan Tuchman [mailto:STuchman@zoa.org]  
Sent: Tuesday, August 30, 2011 3:31 PM  
To: Kim, Emma  
Subject: RE: Rutgers University, Case No. 02-11-2157

Hi, Ms. Kim,

Thanks very much for sending the link to the consent form.

Per our conversation this afternoon, I've attached the letter exchange that the ZOA had with Rutgers President Richard McCormick, in an effort to resolve the problems that Jewish students have been facing. When these efforts proved fruitless, students supported our filing the Title VI complaint with OCR.

I'll be back in touch with you soon about the rest of the information you requested. Many thanks for answering my questions.

Sincerely,  
Susan Tuchman

Susan B. Tuchman, Esq.  
Director, Center for Law and Justice  
Zionist Organization of America  
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New York, NY 10016  
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From: Susan Tuchman [mailto:STuchman@zoa.org]  
Sent: Wednesday, September 07, 2011 5:00 PM  
To: Kim, Emma  
Cc: Castro, Diane  
Subject: RE: Rutgers University, Case No. 02-11-2157

Thank you for the information, Emma (I received the formal request you referred to). I'm hoping to provide OCR with consent forms shortly.

You'd asked for more information about the Facebook messages sent to "John Doe" as described in the ZOA's Title VI complaint.

I've attached an image of the Facebook message that John Doe received from the UCI administrator, Shehnaz Sheik Abdeljaber, on December 9, 2010. John Doe didn't file a bias report about it because he didn't know that Abdeljaber was a university official until later, when he discovered that Abdeljaber was behind a petition apparently directed at getting him removed from his position on the school paper. He learned that the e-mail address cited on the petition was the same as the e-mail address listed for events advertised at the Middle East Studies Center, where Abdeljaber is the Outreach Coordinator.

Also attached is an image of the physical threats that were against John Doe on Facebook, which were posted by students in or about February 2011. As the complaint alleges, Rutgers didn't respond to the bias report that John Doe filed about the posting (threatening to shut him up with a crowbar) for more than one month. Not one university official contacted John Doe to ask for more information about what occurred, or even to see how he was faring and if he was okay. After almost one month of silence, John Doe reached out to the university again, asking about the status of his complaint. A few days later, Rutgers notified him after the fact that the student who physically threatened him couldn't be charged and had been given a warning.

In following up with students about whether they filed bias reports, one student said that he didn't file one because he felt that the effort would be futile, given the university's failure to respond to the problems that Jewish students were facing. I suspect that this is true for other Jewish students, too.

I appreciate your patience. If you have questions or need any additional information, please let me know.  
Susan

Susan B. Tuchman, Esq.  
Director, Center for Law and Justice  
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From: Susan Tuchman  
Sent: Friday, September 16, 2011 2:58 PM  
To: 'Kim, Emma'  
Cc: diane.castro@ed.gov  
Subject: RE: Rutgers University, Case No. 02-11-2157

Hi, Emma,

I've confirmed with [REDACTED] that [REDACTED] bias report concerned only the event on January 29, 2011. I appreciate your looking into how OCR will be handling the ZOA's allegation about the university's response to bias reports by Jewish students. I did want to draw your attention to the fact that the complaint makes clear that to the ZOA's knowledge, bias reports weren't adequately responded to; there may have been some that we are unaware of that Rutgers may have handled to a student's satisfaction.

I am still in the process of obtaining more consent forms and will keep you posted.

Have a good weekend and thank you for your help.  
Susan

Susan B. Tuchman, Esq.  
Director, Center for Law and Justice  
Zionist Organization of America  
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New York, NY 10016  
(212) 481-1500

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