



April 8, 2016

Nasser Paydar
Chancellor, Indiana University-Purdue University Indianapolis
University Hall, Suite 5010
301 University Boulevard
Indianapolis, IN 46202

Re: Discrimination and Harassment Targeting Haneen [REDACTED] and Students for Justice in Palestine at IUPUI

Dear Chancellor Paydar:

I'm writing on behalf of Haneen [REDACTED], a student at Indiana University-Purdue University Indianapolis (IUPUI) and a member of Students for Justice in Palestine (SJP) at IUPUI. As you are aware, Ms. [REDACTED] has been the target of several recent incidents of harassment and discrimination, including threats and intimidation that occurred on campus, targeting Ms. [REDACTED] due to her religion (Islam), national origin (Palestine), and political speech and advocacy supportive of Palestinian freedom.

I write to put these recent incidents in the context of a documented pattern of suppression to silence Palestinian human rights advocacy in Indiana and elsewhere; to remind you of your responsibilities under the First Amendment of the U.S. Constitution and Title VI of the Civil Rights Act of 1964; and to urge you to take immediate steps necessary to ensure Ms. [REDACTED] safety, reputation, and educational opportunities – including her right to speak out in favor of Palestinian freedom and human rights without fear of repression or intimidation – are not further violated.

SJP at IUPUI is a student organization dedicated to “raising awareness on the struggles that the Palestinian people face daily; such as living in apartheid, being denied the basic right of traveling, having to face Israeli military occupation, and having their human rights violated on a daily basis.”¹ SJP “prides itself on peace, tolerance, equality, and justice for all the members of the community and unites everyone for a cause regardless of their religion, ethnicity, and social class.”² Membership in and involvement with SJP undoubtedly serves an important educational purpose. Ms. [REDACTED] is a member of SJP.

¹ Students for Justice in Palestine at IUPUI, <https://theden.iupui.edu/organization/SJPIUPUI/about>.

² Id.

I. Summary of Harassment Directed at Ms. [REDACTED] and SJP

On the weekend of April 1, 2016, SJP at IUPUI hosted a regional meeting of SJPs from universities across the Midwest. In the days leading up to the meeting, during the meeting, and in the days since the meeting, Ms. [REDACTED] has received a number of harassing phone calls and e-mails, and she has been the target of blog posts, an online video, and on-campus flyers, aimed at maligning her and intimidating her from speaking out for Palestinian freedom. These attacks make false accusations insinuating her connection to violence and terrorism based solely on her apparent religion, national origin, and speech critical of Israel and supportive of Palestinian freedom.

The following is a non-exhaustive list of the incidents Ms. [REDACTED] has faced:

- **March 29, 2016:** An unknown person named “Ahmed,” calling from an international number, dialed the personal number of an SJP board member and asked to speak to Ms. [REDACTED]. “Ahmad” told the board member he already had Ms. [REDACTED]’s number. He then called Ms. [REDACTED] multiple times. When Ms. [REDACTED] finally answered, “Ahmed” knew her full name, and claimed that an individual who had contributed \$100 to SJP Midwest’s online fundraiser has ties to Hamas. The caller also asked Ms. [REDACTED] personal questions about her family.
- **March 30-31:** A Facebook user named “Emily Smith” sent messages and emails to SJP members at several schools attending the SJP-Midwest meeting. The messages included the same accusation that a contributor had ties to Hamas, as well as a link to a blogpost claiming that SJP is an “extremist organization.” The blogpost included the time and location of SJP Midwest’s regional meeting.³
- **April 2:** During the SJP Midwest regional meeting, “Ahmed” called an SJP board member again. “Ahmed” said he knew the group was planning to go bowling that night and asked for the name and location of the bowling alley. The SJP board member gave a fake address.
- **April 3:** Flyers claiming that SJP is funded by terrorists were posted at the location of SJP Midwest’s regional meeting on IUPUI’s campus. The flyer stated in part, “The agenda of the SJP Midwest Conference, organized by IUPUI student Haneen [REDACTED], is to coordinate further violent acts on US campuses.” SJP organizers notified IUPUI police, who arrived and took a statement from the group. While IUPUI police were still present, “Ahmed” again called an SJP board member, and said he waited for them at the bowling alley the night before. The board member attempted to give the phone to the police officer who was present, but “Ahmed” hung up. “Ahmed” then called Ms. [REDACTED] again.
- **April 4:** Ms. [REDACTED] became aware of three online blogs written about her, claiming Ms. [REDACTED] is a “dangerous Palestinian Hamas supporter,”⁴ a “major potential threat to the national security,”⁵ a “would-be attacker”⁶ and raising alarm over her “open support of terrorism.”⁷ One of the bloggers claimed to be an IUPUI student. Another claimed to have seen the inside of Ms. [REDACTED]’s home.

³ The blogpost can be found here: [REDACTED].

⁴ [REDACTED]

⁵ Id.

⁶ [REDACTED]

⁷ [REDACTED]

- **April 5:** Chancellor Nasser Paydar indicated support for Ms. [REDACTED], but declined Ms. [REDACTED] request to issue a public statement condemning the incidents.
- **April 6:** Ms. [REDACTED] discovered a video posted on Vimeo of an individual claiming to be a Hamas member holding a weapon, speaking in a non-Palestinian Arabic accent, thanking ‘Sister Haneen [REDACTED] and “SJP Indianapolis” for their support. The video appears inauthentic and is intended to malign Ms. [REDACTED] and SJP by insinuating a link between them and armed Palestinian groups where none exists, as is the intention of the above described attacks.
- **April 7:** Chancellor Paydar issued a statement to students and faculty stating that the university “abhors all forms of racism, bigotry, and discrimination, including discrimination based on religious beliefs or political views,” and reiterating the university’s commitment to free expression and the exchange of ideas. The statement, however, made no mention of the specific incidents targeting Ms. [REDACTED] and Students for Justice in Palestine.

II. Pattern of Suppression of Palestine Advocacy

As university administrators, it is important that you understand the broader political context in which these incidents have occurred. In recent weeks in Indiana, it appears that Israel advocacy groups have increased their efforts to intimidate and silence Palestine advocacy. Individuals affiliated with a mysterious, pro-Israel group called Sawtona have harassed professors who are outspoken advocates of Palestinian rights, monitored at least one Palestine-related event at IUPUI, and posted flyers on campus, possibly in violation of University policy. In March, a professor at Purdue University was falsely linked by a local Israel advocacy group to anti-Semitic graffiti found at his school due to his outspoken views critical of Israeli policies.⁸

These recent incidents in Indiana are part of a national trend to suppress Palestine advocacy. Last year, Palestine Legal responded to 240 incidents of censorship, punishment or other burdening of advocacy for Palestinian rights. The overwhelming majority of these incidents—80 percent—targeted students and scholars on 75 campuses across the country.⁹

Last September, Palestine Legal and the Center for Constitutional Rights released a report, *The Palestine Exception to Free Speech in the U.S.*,¹⁰ which documents how Israel advocacy organizations routinely level false accusations of antisemitism and support for terrorism against campus members. These accusations are increasingly manifesting themselves through personal attacks, often made online, aimed at threatening and intimidating those who advocate for Palestinian rights.

III. IUPUI’s legal obligation

IUPUI has an obligation, under the First Amendment and Title VI of the Civil Rights Act of 1964, to ensure that Palestinian students and Palestine solidarity activists enjoy the right to speak out in favor of Palestinian freedom without discrimination based on the viewpoint they express, and that students are protected from harassment, intimidation, and discrimination based on their

⁸ See Paul Miller, *Swastikas on Campus: Anti-Semitism Blamed on Anti-Israel Academics*, *The Observer*, March 10, 2016, <http://observer.com/2016/03/swastikas-on-campus-anti-semitism-blamed-on-anti-israel-academics>.

⁹ See Palestine Legal, *2015 Year in Review: Suppression of Palestine Advocacy Continues*, Jan. 26, 2016, <http://palestinelegal.org/news/2016/1/26/suppression-of-palestine-advocacy-in-2015>.

¹⁰ The report is available online at <http://palestinelegal.org/the-palestine-exception>.

race, color, or national origin. As you know, Title VI prohibits discrimination on the basis of religion when, as with the Islamophobic attacks Ms. [REDACTED] has faced, the actions are based on a group's actual or perceived shared ancestry or ethnic characteristics.

Given the clear pattern of online and on-campus harassment and discrimination specifically targeting Ms. [REDACTED] as documented above, the University must take action to ensure that Ms. [REDACTED] educational opportunities are not obstructed. At a minimum, the University should:

- Commit its resources to investigating the harassment and discrimination Ms. [REDACTED] has faced. For example, eye witness accounts and/or security camera footage may provide clues about who posted the flyers referenced above;
- Issue a public statement affirming the rights of students to speak out in favor of Palestinian freedom, and condemning Islamophobic rhetoric and harassment generally and as directed toward Ms. [REDACTED] and SJP; and
- Work with Ms. [REDACTED] to ensure that the attacks and accusations made against her do not negatively impact her educational and/or employment prospects.

I look forward to hearing from you regarding the University's response to these incidents. I can be reached at rsaksena@palestinelegal.org or 312-399-6624.

Sincerely,

Rahul Saksena
Staff Attorney, Palestine Legal

cc Joseph Scrodo, Deputy General Counsel