

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

In the Matter of

COLUMBIA STUDENTS FOR JUSTICE IN PALESTINE,  
COLUMBIA-BARNARD JEWISH VOICE FOR PEACE,  
MARYAM ALWAN, and CAMERON JONES,

Petitioners,

-against-

TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY  
OF NEW YORK, COLUMBIA UNIVERSITY IN THE  
CITY OF NEW YORK, MINOUCHE SHAFIK, in her  
official capacity as President of Columbia University in the  
City of New York, and GERALD ROSBERG, in his official  
capacity as Senior Executive Vice President of Columbia  
University in the City of New York,

Respondents,

For a Judgment Pursuant to Article 78 of the Civil Practice  
Law and Rules.

Index No.: \_\_\_\_\_

**AFFIRMATION OF CAMERON JONES**

I, Cameron Jones, affirm on this 9th day of March 2024, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.

1. I am a second-year student at Columbia University pursuing a degree in urban studies. I am 19 years old.
2. I am a member and organizer of the Columbia-Barnard Jewish Voice for Peace (“JVP”).
3. JVP was first recognized by the university in 2014 and it has maintained a presence on Columbia’s campus, with varying degrees of activity, over the past ten years.
4. Nationally, Jewish Voice for Peace is the largest Jewish anti-Zionist organization in the world. According to its vision statement, Jewish Voice for Peace “envisions a world where all people — from the U.S. to Palestine — live in freedom, justice, equality, and dignity.”

5. JVP has two main missions: (1) to create a safe community, and cultural space for anti-Zionist Jews; (2) to be an activist group that is inspired by Jewish tradition, that fights for Palestinian liberation while centering Palestinian voices.
6. I joined JVP in September 2022. As an anti-Zionist Jew, I have always looked for a community space to express and celebrate my Judaism, as well as to advocate for my political beliefs—and I found that in JVP. I also have personally traveled to Israel, and I have family members that have served in the Israeli military. In many ways, this reality of my directness to the subjugation of Palestinians pushes me even more to participate in the movement for collective liberation.
7. As a political student group, JVP is recognized by and falls under the direct supervision of the Student Governing Board (“SGB”). JVP also directly interacts with its Undergraduate Student Life (“USL”) advisor. As a recognized student organization, JVP is entitled to a certain amount of funding every semester and is entitled to reserve space on Columbia’s campus for student group activities. JVP is also entitled to certain processes through the SGB and the Student Group Adjudication Board (“SGAB”) for adjudicating complaints about our student group, including complaints that our group has violated university rules and policies.
8. At the beginning of every semester, JVP, just like other student organizations has to participate in what is called the “club refuel process” (<https://www.cc-seas.columbia.edu/ClubReFuel>) First, four members from each student group have to take (and pass) a quiz called the “Student Organization Knowledge Assessment.” This quiz tests your knowledge of university policies for booking rooms and using funds. Second, one member must fill out a separate student organization survey. And finally, those same four members who pass the quiz must meet with the student group’s advisor and attend sexual violence prevention training.
9. JVP maintains a horizontal structure among its members. Over the years, JVP has often coordinated with Students for Justice in Palestine (“SJP”), another student organization, because of our shared goals—for example by organizing joint demonstrations and vigils, and in advocating for the Boycott Divest Sanction (“BDS”) movement. In the fall of 2023, SJP and JVP had the same faculty advisor, Marnie Whalen-Turini. SJP and JVP are—and have long been—the largest and most prominent student groups on campus that advocate for Palestinian rights and liberation. In my experience, this prominence has resulted in our student groups receiving the most attention (and the most scrutiny), both internally and externally.
10. SJP and JVP are both a part of Columbia University Apartheid Divest (“CUAD”), which is “a coalition of student organizations that see Palestine as the vanguard for our collective liberation” (attached as **Exhibit A** is a jointly authored op-ed by member organizations of CUAD that explains who we are).<sup>1</sup> The coalition was initially formed in 2016 and successfully passed a college-wide referendum in favor of divestment (that was subsequently overturned by then-president), in mid-October 2023 we worked with other

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<sup>1</sup> *Columbia University Apartheid Divest: Who we are*, *Columbia Spectator* (Nov. 14, 2023), <https://www.columbiaspectator.com/opinion/2023/11/14/columbia-university-apartheid-divest-who-we-are/>

student groups with similar values to reactivate it as a response to the overwhelming support for Palestinian freedom from students on Columbia's campus. As of this date, CUAD coalition includes over 100 student organizations.

11. As of October 2023, JVP was an officially recognized and active student organization. On November 10, 2023, JVP was suspended and as a result, lost access to its funding, as well as other privileges. As of this date, while JVP maintains recognition under SGB, Columbia University has not yet lifted the suspension of JVP nor returned any of its privileges.
12. Since I joined JVP, I have participated in the coordination of actions and events, as well as in speaking with university administrators, and our student club advisor. I maintain access to JVP's official email inbox, which is listed on the university's website for student organizations, as well as our Instagram account.
13. Some of our events in the school year 2022 to 2023 included Shabbat dinners, film screenings, study sessions. Many of these events required the use of our student group's allocated funds and some of them have required us to book space on campus through the online Events Management System ("EMS"). I remember that for Passover, we had a seder and read from the Haggadah in a dorm lounge. JVP is a special space for those of us who do not feel particularly comfortable participating in the mainstream Jewish communities on campus, many of which are explicitly Zionist spaces (i.e. spaces where the belief in the political ideology of Zionism, or the idea that Israel should be an ethno-national state, rather than a place where all people are treated equally, is promoted).

#### Experience on Campus—October 2023

14. By mid-October 2023, JVP members including myself became increasingly concerned that Columbia still had not acknowledged the deaths of Palestinians in Gaza or the over 75-year occupation of Palestine by the Israeli government. Alongside SJP, we began to attend and organize protests—both on and off campus—in support of Palestinian rights. We also began to meet regularly with other student groups that shared our values to discuss actions we should take on campus, including the revival of CUAD.
15. On October 25, 2023, I, along with other members of JVP, wrote an open letter in the Columbia Spectator entitled, "Dear Fellow Jews of Columbia" (attached as **Exhibit B**, <https://www.columbiaspectator.com/opinion/2023/10/25/dear-fellow-jews-of-columbia/>). In it, we reminded the Jewish community at Columbia that our collective trauma was and continues to be weaponized to justify horrific war crimes. We urged others to finally recognize that the stories the Israeli government tells us are blinding us and preventing us from looking past our own belief systems and considering the emotional and physical distress of non-Jewish students. We asked:

*As Jews, our faith and culture teaches us that critical thought and intellectual rigor are central pillars to our identity. We ask, where is that desire for justice now? Why are we not all fighting for peace and an end to suffering? Why is it that we accept certain narratives as unconditionally true, while disregarding others as categorically untrue?*

16. The next day, on October 26, Barnard President Rosenbury published a “community message” conflating anti-Semitism with anti-Zionism (<https://barnard.edu/news/time-action>).
17. I am aware that between October 7 and November 9, 2023, the student organization Students Supporting Israel (“SSI”) held at least six vigils, demonstrations, and counterprotests on Columbia University’s Morningside Campus—all of which were held either without prior advertising—which presumes that it was not officially confirmed with the university—or within two days of advertising it.<sup>2</sup> For example, on October 7, SSI advertised and held a vigil at the Sundial in the evening to remember the lives of those killed by Hamas earlier that day. On Monday, October 9, SSI held a vigil at Low Plaza.<sup>3</sup> That same day, SSI advertised a “community gathering at Sundial,” to be held at 4p.m. the next day. On October 10, SSI held their gathering at the Sundial. On October 12, SSI held a counterprotest on the west field of the South Lawn across from SJP and JVP’s scheduled protest on the east field of the South Lawn. In the evening of October 18—as Dar, the Palestinian Students Union, held a vigil on the Low Steps to honor the lives of the 500 Palestinians that had been killed by Israel’s military at Al-Ahli Hospital in Gaza the day before—SSI held a counter-vigil outside of the Butler Library. On November 1, SSI held another event, wherein members stood at the Sundial and handed out flowers to remember those who had been killed on October 7.

18. By November 6, 2023, over twenty student organizations had joined the revived CUAD coalition. SJP, JVP, Barnard-Columbia Student Abolition Collective (“BCAC”), and two other student groups, all advertised on Instagram on behalf of CUAD about a “Week of Visibility for Palestine,” which invited students to participate in different types of actions in solidarity. The photo to the right is a true and correct copy of one of the slides of the shared advertisement on that day. The first action was a call for students to wear their Keffiyeh (Palestinian scarf) during the week; the second was an announcement that Lerner Ramp Lounge was reserved for two hours daily as a space for shared grief and community (this was organized by Dar, a student group that is also a member of CUAD); the third was an announcement that CUAD would be



<sup>2</sup> Student organizations at Columbia University largely advertise their upcoming events by posting on their social media accounts or by sharing information through channels such as WhatsApp. The following link on the university’s website provides a fair and accurate map detailing the layout of Columbia University Morningside Heights campus, where many of these events take place:

[https://cufo.columbia.edu/sites/default/files/content/morningsidemap\\_2015aug-7.pdf](https://cufo.columbia.edu/sites/default/files/content/morningsidemap_2015aug-7.pdf)

<sup>3</sup>“Low Library” is the large building identified on the campus map. “Low Steps” is colloquially known to be the large set of steps in front of Low Library, where the alma mater statue sits. Similarly, “Low Plaza” is colloquially known to be the open area in front of the Low Steps.

participating in the National shut it down for Palestine day on November 9 by holding a peaceful protest and art installation; and the fourth was an advertisement for a teach-in organized by BCAC regarding ongoing State repression of liberation movements. BCAC is also a Columbia University recognized student organization.

19. On November 7<sup>th</sup>, JVP and SJP advertised the upcoming CUAD demonstration, inviting students to “Join Columbia University Apartheid Divest in a Walkout.” The Instagram post called for students to leave class at 2p.m. and head to the Low Steps for a peaceful protest art installation. The photo below is a true and correct copy of the flyer as it appeared on the JVP Instagram account.<sup>4</sup>



20. To my understanding, none of the recognized student group within CUAD reserved the Low Steps for this demonstration. This was not the only time that month that university-recognized student groups within CUAD (other than SJP and JVP) posted about an upcoming Palestine-related action that had not been confirmed with the university. On November 8, Columbia Law Coalition for a Palestine posted this same flier for CUAD on their Instagram writing, “join the call from activists across the nation to shut it down for Palestine on November 9.” And on the day of the November 9 CUAD demonstration, Dar also posted the same flier on their Instagram account and wrote, “join us today!”

#### November 9, 2023, Peaceful Demonstration and Temporary Art Installation for Palestinian Lives

21. On the evening of November 8, in preparation for the upcoming demonstration, CUAD held an “art build workshop.” The basement of my dorm was packed with students from

<sup>4</sup>[https://www.instagram.com/p/CzXNHZCOj60/?utm\\_source=ig\\_web\\_copy\\_link&igsh=MzRIODBiNWFIZA==](https://www.instagram.com/p/CzXNHZCOj60/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA==)



the student groups that had joined CUAD, working on the art pieces for us to display at the protest.

22. In the evening and morning leading up to CUAD's demonstration, Ms. Whalen-Turini and Undergraduate Student Life Executive Director of Student Engagement Aaron Gomes had emailed JVP members to postpone the upcoming demonstration to comply with a strict 10-days advance notice requirement for events.
23. In response, at 12p.m. on November 9<sup>th</sup>, JVP emailed a letter on behalf of CUAD to Ms. Whalen-Turini, Mr. Gomes, as well as Vice Dean of Barnard College Nikki Youngblood Giles, VP/Dean of Barnard College Leslie Grinage; and the executive board of the SGB (Attached as **Exhibit C**, CU Apartheid Divest Letter dated Nov 9, 2023).
24. We explained that this letter was written "on behalf of SJP, JVP, the larger Columbia University Apartheid Divest Coalition representing 20+ organizations across all four undergraduate and sixteen graduate schools, and other concerned student organizations." We clarified that the upcoming protest "is not a demonstration organized by a single student group. Rather, we are a coalition of Columbia students and organizations who are collectively joining this international call to action."
25. In this letter, CUAD also took issue with the university's newly announced strict 10-day notice period for events policies, including demonstrations and vigils. The letter requested an explanation as to the rationale behind the updated policy and acknowledged the concerning shift in the university's position, stating:

*We also highlight that in prior conversations with the administration, communications were shared to both SJP/JVP and Students Supporting Israel (SSI) that the 10/12 protest could be planned with short notice because the policy makes exceptions for "special circumstances for emergencies in the world." We ask then: what has changed? **Palestinians continue to be killed at a merciless rate. How is it not just as pressing in the current moment when two million Palestinians are facing collective punishment in the form of mass starvation, dehydration, and medical deprivation?** Although the university might not consider attacks on Gaza an "urgent global crisis" as they do attacks on Israel, the members of SJP, JVP, and the larger coalition still think this is an important and urgent call to action. We can only conclude that this is a continuation of the administration's inhumane message that Palestinian lives simply do not matter, as evidenced in their persistent refusal to even mention Palestinians in university-wide communications. We reject this genocidal premise and reaffirm our coalition's central belief in the radical equality of lives.*

26. Finally, the letter concluded by agreeing to meet with USL, the SGB, and the Barnard Deans and requested their availability. Because of the ongoing fear of doxing, we asked that they provide us with a list of all attendees prior to the meeting and we agreed to do the same. We stated that it is important to CUAD that all meetings with the university be open to all coalition members.

27. We did not receive a response to this email.
28. About two hours later, I and over 200 other students arrived at the Low Steps.
29. During the November 9 demonstration, we crafted a powerful piece of art by writing the names of over 10,000 Palestinians who had been murdered in Gaza by Israel in the ongoing genocide. We listened as our Palestinian friends shared their personal stories. Engaging in a symbolic die-in,<sup>5</sup> we also chanted about the imperative for Palestinian lives to be valued and liberated just as ours are. This experience reminded me of my initial decision to join JVP—to cultivate such impactful moments. I remember that we concluded this protest by singing in unison, “we shall overcome.”

#### November 10 Suspension Decision and Public Announcement

30. At 1:18p.m. on November 10<sup>th</sup>, only four members of JVP apparently received an email from USL Dean Cristen Scully Kromm to their individual inboxes,<sup>6</sup> forwarding a message from Vice President Gerald Rosberg as “Chairman of the Special Committee on Campus Safety,” informing us that JVP and SJP had been suspended. It stated that “[t]his decision was made after the two groups repeatedly violated University policies related to holding campus events, culminating in an unauthorized event Thursday afternoon that proceeded despite warnings and included threatening rhetoric and intimidation.” One of my friends who received the email shared it with the rest of JVP members (Attached as **Exhibit D** is a screenshot of the email that my friend received and shared with me at the time).
31. Before the November 10 suspension notice, I had never heard of a “Special Committee on Campus Safety.”
32. A little over one hour later—by 2:32p.m.—we saw that Columbia University had publicly announced our suspension on the website. The contents of the website announcement, which is still a live link (Attached as **Exhibit E**),<sup>7</sup> mirrored the contents of the email my friends had received.
33. This notice surprised me and others for many reasons. First, by that point, the university knew we were not the only student groups involved in the planning and participation of the CUAD November 9<sup>th</sup> demonstration. Perhaps we were the most visible and the easiest targets, but we just were not the only ones. Second, I could not wrap my head around what could possibly be so abhorrent about hundreds of university students mobilizing in this way to draw attention to the continued mass killings and intentional starvation of thousands of innocent human beings in Gaza, that it required an immediate suspension. Finally, it was my understanding that even if our student groups *had violated* university policies, we were entitled to some sort of investigation and adjudication process through the SGB or

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<sup>5</sup> For those who do not know, a “die-in” is a form of protest where individuals lie on the ground to symbolize the lives that have been lost.

<sup>6</sup> The email was not sent to JVP’s email inbox.

<sup>7</sup> The link to the November 10 suspension announcement is also available here:

<https://news.columbia.edu/news/statement-gerald-rosberg-chair-special-committee-campus-safety>

the SGAB—not this unheard-of Special Committee on Campus Safety. In fact, CUAD had just offered to meet with USL, SGB and Barnard Deans to talk through things!

34. Beyond the alleged procedural violation, I was disheartened to see the accusation that SJP and JVP had engaged in “intimidating and threatening rhetoric.” If members of SJP and JVP had violated the Rules of University Conduct, which this notice seemed to allege, then we were entitled to a process through the University Judicial Board. And if the *groups* were being accused of violating any rules—Rules of University Conduct, university policies—we were entitled to address that complaint through the SGB or SGAB’s processes. Beyond the process issues, I was frustrated that this description of our advocacy perpetuated the harmful assumption that Palestinians and Pro-Palestine supporters are all threatening and dangerous individuals.

#### November 30<sup>th</sup> Meeting with Vice President Gerald Rosberg

35. On November 30<sup>th</sup>, 2023, I attended a meeting in Professor Katherine Franke’s office including VP Rosberg, Maryam Alwan from SJP, Professor Katherine Franke, Professor Joseph Slaughter, Joseph Defraime Greenwell, Dean Kromm, Jaxon Williams-Bellamy, Co-Chair of the Senate Rules Committee, and chair of the University Senate Executive Committee Dr. Jeanine D’Armiento. I recorded a portion of the meeting on my phone.
36. The purpose of the meeting was to discuss the November 10<sup>th</sup> suspension of our two student groups because we had several questions that Professor Franke had submitted on our behalf that had not yet been answered.
37. During the meeting, VP Rosberg specifically acknowledged that, up until the last few days, he had watched all the past protests and that he had not seen violations of the Rules of University Conduct. Since the Rules of University Conduct allow the university to restrict expression that constitutes a “genuine threat of harassment,” I understood VP Rosberg’s statement to be an acknowledgement that our statements, our chants, etc. at these protests did not constitute a “genuine threat of harassment.”
38. Professor Franke asked VP Rosberg to explain what about the rhetoric used at the November 9<sup>th</sup> event was “intimidating” or “threatening” to which VP Rosberg specifically responded that “no rules violation” had occurred on November 9<sup>th</sup> and that at no point had he intended to assert that a rules violation occurred. This did not answer the question about why, then, the university would choose to insert this language in its public announcement.
39. Still concerned that the notice of the suspension painted JVP and SJP as intimidating, I explained to VP Rosberg that as a Jewish student who represents an organization of Jewish people on campus, I felt as if he was only being responsive to Jewish students who wanted to support Israel. I explained that JVP members including myself have felt ostracized by the administration and the campus community because of the suspension.
40. Further, I said that this seemed to be an attempt to symbolically show that the University was responding to criticisms of, and requests to *shut down* Pro-Palestine protests.



41. Towards the end of the meeting VP Rosberg explained to us that while there was pain on both the Pro-Israel and Pro-Palestine supporters, the students who are supporting Israel have more of a fear associated with the protests. I could not understand why this would be a valid reason to suppress the voices of other Jewish students who were using their voices to assert that we do not support the ongoing genocide that is being committed in our name.
42. We later learned that along with VP Rosberg, Joseph Greenwell was also part of the “special committee” that had decided on both SJP and JVP’s suspension.

#### Student Governing Board Vote

43. On December 2, 2023, I received an email from the executive board of the SGB to its member groups,<sup>8</sup> wherein it issued a statement condemning the university’s decision to unilaterally suspend SJP and JVP as “untenable with the purpose and mission of” the SGB (Attached as **Exhibit F** is the SGB’s “Statement from the SGB on Recent Administrative Decisions” dated December 2, 2023). SGB wrote, in relevant part:

*Historically, disciplinary action and oversight of student groups relating to event policy has been the responsibility of the governing boards. In the most severe cases, the Student Group Adjudication Board presides over formal proceedings relating to student group violations of Undergraduate Student Life (USL) Policy and University Policy. The actions taken by the University to unilaterally suspend student groups and implement policy decisions without the consultation and input of student leadership is unprecedented and moreover communicated a fundamental distrust of the role students have in University decision making. As such, we find the University’s actions to be untenable with the purpose and mission of the Student Governing Board.*

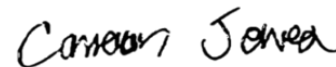
44. That same day, the executive board of the SGB sent another email alerting its member groups that it has voted to recommend “Non-Cooperation with a contested University Policy” at the December 5<sup>th</sup> Town hall, which is the general body meeting for SGB member groups. These policies were the events policies that the university had amended at the end of October—which, among other things, implemented a strict 10-day notice requirement for things such as vigils and demonstrations—and then subsequently suspended our student groups for allegedly violating its provisions.
45. On December 5, 2023, members of SJP and JVP attended the Town Hall, and we exercised the right to vote on this recommendation. This recommendation won by an overwhelming majority of the SGB-recognized student organizations (Attached as **Exhibit G** is a screenshot of the email that I received from SGB on December 7 explaining the results of the vote).

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<sup>8</sup> We also received this email in the JVP inbox, to which I have access.

January 8, 2024, Meeting with Dean Kromm

46. On January 8, 2024, I, along with other members of SJP and JVP had a meeting with Ms. Whalen-Turini, Dean Kromm, Mr. Gomes, and Yanni Kent (the chair of the SGB Executive Board and SGB delegate to the SGAB). One of the students recorded this meeting.
47. In a portion of this discussion, I explained my concern about the lack of transparency about this entire process, including our suspension and the process for reinstatement. For example, I explained to Dean Kromm that it seems that VP Rosberg and the rest of this largely unnamed special committee still has the ultimate say as to whether we get to be reinstated. I explained to Dean Kromm my concern that we might get reinstated just to be improperly suspended again. By improperly suspended, I meant not through the proper SGB/SGAB channels again.
48. In discussing the things that the administration did in the fall semester, including the announced change in events policies and the suspension of SJP and JVP, Dean Kromm stated, “fair or unfair, I think this had a lot to do with the change in university leadership. And I think that there might not have been this understanding of what processes were in place.” She also acknowledged that the university was “looking differently” now at event requirements. She further explained that student groups, as a typical matter, are held accountable through the Student Group Adjudication Board, and the SGB.



Cameron Jones