

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 CHIGURUPATI SONALI**

I, Chigurupati Sonali, affirm on this 11<sup>th</sup> 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 former employee of the Columbia College Fund (“CC Fund”), which is one of the main funds responsible for the College’s fundraising efforts. CC Fund works alongside the Columbia College Alumni Association and Columbia School of Arts and Sciences fundraising.
2. I began my full-time employment as a development associate at Columbia College Fund (“CC Fund”) in December 2021 and voluntarily resigned October 31<sup>st</sup>, 2023.
3. At the point at which I quit, there were 4 development associates total and I was the most senior development associate on staff.
4. As a development associate, I was responsible for processing checks and donations, planning events for alumni donor and societies, writing newsletters, and providing support to individual donors by coordinating special access to Columbia events.

5. I was also responsible for reviewing emails sent to the “CCFund@columbia.edu” email address (“CCF Email”). All the other associates were also responsible for checking this email. This email was the general inbox for people who wanted to communicate with CC Fund. Development associates are given access to this general inbox to ensure that people who reach out to us were either immediately receiving answers to their questions or were escalated to other staff members in the CC Fund.
6. Prior to October 2023, we received, on average, 5 emails in the CCF Email a week. These emails typically consisted of clerical or administrative issues including requests for the CC Fund tax information, check related issues and other simple donation related questions.
7. Prior to October 2023, I did not regularly see complaints, threats, or other negative types of emails sent to the CCF Email.
8. While I was never provided with an explicit policy as to how we should deal with complaints sent to the CCF Email, in past instances where we received complaints, the general practice for me was that if it was from a managed donor, the complaint should be sent to, and handled by, their donor manager. If the message was vague, too dramatic, or not sent by a managed donor, I typically did not respond to those emails and was never asked to escalate any of these types of complaints by my bosses.
9. A managed donor is a person identified as a significant donor or volunteer by CC Fund and whose donation portfolio is managed by a staff member at CC Fund. I did not manage any donors directly in my time at CC Fund.
10. Starting around Monday, October 9<sup>th</sup> 2023, I observed an immediate increase in the number of emails we received to the CCF Email. Where we had previously seen 5 emails a week, we were seeing 10 per week.
11. In addition to the increase in emails to the CCF Email, my manager was also forwarding me an additional 5 to 7 emails that came in their direct inbox.
12. The emails we received also changed from the usual content—almost all of the emails we received criticized Columbia for their lack of support of Israel, Columbia’s failure to condemn Hamas publicly, and its failure to respond more harshly to pro-Palestine advocacy. Many of these emails included anti-Arab and Islamophobic comments including reference to students as terrorists and assertions that Arab and Muslim students were not telling the truth about their negative experiences on campus.
13. In most instances I was directed by my managers to connect donors with Robyn Guzman, who is the Director of Marketing for the Office of Alumni Development. Before October 9<sup>th</sup>, I had never interacted with Ms. Guzman, even when we received complaints in the past.
14. When I emailed a complaint to Ms. Guzman, she would reply to some directly to on an email chain that I did not have access to. In other instances, I would be allowed to reply to the donor and make sure the donor knew that their concerns were being escalated and taken

seriously. I sent approximately 15 emails to Ms. Guzman. This was a new process for me as the senior most development officer.

15. In other instances, I was a part of email discussions via the CC Fund email, that included the Dean of Columbia College, Joseph Sorett, directly communicating with donors who had brought complaints of antisemitism and anti-Zionism. I had never experienced involvement from the Dean of Columbia College in emails with donors prior to this period.
16. Soon after October 9<sup>th</sup>, I received an email from one of my managers to all development associates that asked us to log any complaints from donors related to Israel or Palestine in a Google form. We were asked to log any complaints from donors, including the text of the email they sent, the donor's information and manager, who they had been escalated to, and what follow up was necessary. We kept this information in a master Google Doc spreadsheet, which was shared amongst the CC Fund, Columbia College Alumni Relations and Development, and Arts and Sciences Fundraising.
17. By October 31<sup>st</sup>, this Google Doc spreadsheet had logged over 80 specific complaints related to antisemitism, anti-Israel, anti-protest activity.
18. Between October 9<sup>th</sup> and October 31<sup>st</sup>, I saw, catalogued, and escalated to Ms. Guzman at least 3 specific emails that demanded Columbia University shut down Students for Justice in Palestine. The emails asked for the groups to be "disbanded," "suspended" and "not active on campus." The emails criticized the student groups for holding vigils early on and for their perceived support of Hamas.
19. Throughout the month of October, I was increasingly concerned that we were being asked to respond to complaints from donors and members of the general public that were openly racist, anti-Arab and Islamophobic. As a South Asian person who actively supports Palestine and Palestinian rights, it was extremely distressing to work in an office where these kinds of comments were being treated as valid concerns to be dealt with.
20. Several days prior, I saw a series of emails from a donor and volunteer who stated that Columbia cared more about Black people than Jewish people and that claimed that all of the accounts of Islamophobia on campus were exaggerated. In the past, this might have been the kind of email that we would ignore, but because of our new practices for complaints related to Israel and Palestine this email was logged and escalated as well.
21. I had expressed my concern by email with CC Fund's response to these racist emails to my other development associates. On October 31<sup>st</sup>, I was called into a meeting with Human Resources and my union representative where I was informed that I was under investigation for my statements the days prior calling the donor a racist, which had hurt one of my colleagues. Immediately following the meeting, I decided that CC Fund was no longer aligned with my values and that the constant responsiveness to racist donors was causing a negative impact on my mental health, so I decided to quit. I quit my position at CC Fund on October 31<sup>st</sup>.

22. On November 10, 2023, when I saw the public announcement that Students for Justice in Palestine had been suspended from Columbia campus, I immediately associated it with the string of emails that we had received in my time at CC Fund.



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Chigurupati Sonali