

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.: _____

VERIFIED PETITION

PRELIMINARY STATEMENT

1. This Article 78 action challenges Columbia University’s summary suspension of its two most prominent student groups that advocate for Palestinian rights, the petitioners Columbia Students for Justice in Palestine and Columbia-Barnard Jewish Voice for Peace. In the midst of intense protests on campuses across the country against Israel’s military campaign in Gaza, these two Columbia groups advertised and participated in a peaceful campus protest on November 9, 2023 that was sponsored by a coalition comprised of over 20 groups. The next day, university officials singled out SJP and JVP and suspended them for alleged violations of university procedural rules governing campus events. The two groups were given no notice of the

planned suspensions and no opportunity to respond to the charges or to contest them. None of the other groups involved in the event faced disciplinary action.

2. In the aftermath of student protests that shook the Columbia University community in 1968, the university implemented policies and procedures for assuring that the right to protest would be respected and that student groups would have procedural protections when faced with efforts by university officials to discipline them, including the creation of a specific process for the handling of alleged violations of university rules by student groups. In suspending SJP and JVP on November 10, 2023, Columbia University disregarded these rules entirely and instead summarily and unilaterally punished the groups.

3. Not only did Columbia University violate its own policies and procedures in sanctioning SJP and JVP, its imposition of the serious penalty of suspension was plainly disproportionate to the minor violation of procedural rules the university invoked. Indeed, the fact that no other group involved in the November 10 demonstration faced consequences reveals that SJP and JVP were targeted for punishment not because of the claimed rules infractions but because of the content of their advocacy. Notably, at the time of the suspensions, Columbia was facing intense public pressure to crack down on pro-Palestinian advocacy on its campus, including specific demands that it punish SJP and JVP.

4. Columbia University's suspension of SJP and JVP violates long-established law requiring private universities to comply with their own disciplinary procedures and requiring punishment be proportionate to alleged offenses. The petitioners therefore seek nullification of the two suspensions and related relief.

VENUE

5. Pursuant to CPLR 7804 (b) and 506 (b), venue in this proceeding lies in New York County, in the judicial district in which the respondents took the actions challenged here and where the office of the respondents is located.

PARTIES

6. Petitioner COLUMBIA STUDENTS FOR JUSTICE IN PALESTINE (referred to in this petition as “SJP”) is a student group that is part of a nationwide student movement advocating for Palestinian liberation, human rights, and self-determination. It was established over a decade ago and is overseen and supervised by Columbia University’s Student Governing Board.

7. Petitioner COLUMBIA-BARNARD JEWISH VOICE FOR PEACE (referred to in this petition as “JVP”) is a diverse and democratic group of student activists inspired by Jewish tradition to work together for peace, social justice, and human rights. It is the Columbia University chapter of the largest Jewish anti-Zionist organization in the world and is overseen and supervised by Columbia University’s Student Governing Board.

8. Petitioner MARYAM ALWAN is an undergraduate student at Columbia University and resides in New York City. Alwan is a person of Palestinian descent and joined SJP in spring 2023 to advocate for the humanity and rights of Palestinian people worldwide. Ms. Alwan appears in this action as a representative of SJP and as an individual.

9. Petitioner CAMERON JONES is an undergraduate student at Columbia University and resides in New York City. Jones is Jewish-American and joined JVP in 2022. Advocating against oppression and for the basic rights of Palestinians is integral to his beliefs as an anti-Zionist Jewish person. Mr. Jones appears in this action as a representative of JVP and as an individual.

10. Respondent TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY OF NEW YORK is the legal name of Columbia University in the City of New York (“Columbia University”

or “Columbia”), a private educational institution with a campus in upper Manhattan and where the actions alleged in this Petition occurred.

11. Respondent COLUMBIA UNIVERSITY IN THE CITY OF NEW YORK is a private educational institution with a campus in upper Manhattan and where the actions alleged in this Petition occurred.

12. Respondent MINOUCHE SHAFIK is the President of Columbia University and is sued in her official capacity.

13. Respondent GERALD ROSBERG is the Executive Vice President of Columbia University and is sued in his official capacity.

FACTS

Columbia University’s Commitment to Free Expression and Open Debate on Campus and Shared-Governance Structures

14. Covering a host of important political issues from anti-Black racism, the Vietnam war, reproductive rights, climate change, and Israel-Palestine, Columbia University (“Columbia”) has a history of vibrant student activism that has taken many forms, including demonstrations, rallies, picketing, strikes, and sit-ins.

15. Columbia has touted its “long tradition of valuing dissent and controversy and in welcoming the clash of opinions onto campus,” and has expressed its commitment to “ensure members of [its] community may engage in [its] cherished traditions of free expression and open debate” thereby fostering a culture of student protest and activism on campus.

16. Codifying this commitment in its Rules of University Conduct, the university affirmatively promises that

the University cannot and will not rule any subject or form of expression out of order on the ground that it is objectionable, offensive, immoral, or untrue. Viewpoints will inevitably conflict, and members of the University community will disagree with and may even take offense at both the opinions expressed by others and the manner in which they are expressed.

But the role of the University is not to shield individuals from positions that they find unwelcome.

17. Student activism itself has played a key role in securing and strengthening Columbia's commitment to supporting student protest and free expression.

18. In 1968, Columbia's campus experienced intense student protest activity in opposition to the Vietnam War and the university's plan to build a gym in Morningside Park to which the surrounding and predominantly Black residents would have limited access. Hundreds of students protested, marched, and engaged in sit-ins.

19. Unable to effectively engage with the students regarding their demands, the university administration instead cracked down on student activists, at one point bringing in over 1,000 New York City Police Department officers to quell the protests, which led to over 700 arrests and over 100 students injured.

20. A fact-finding investigation commissioned by the university to identify the root causes of the 1968 "crisis" observed that the university administrators had "conveyed an attitude of authoritarian [sic] and invited distrust" and contemporary attitudes regarding university/student relations conveyed that students felt they had "no voice," and "the idea of due process . . . was foreign."

21. The events of 1968 and revelations from the fact-finding investigation ushered in unprecedented institutional reforms still in place today.

22. In 1969, the university established the University Senate and the Student Governing Board ("SGB") as part of a new shared-governance structures to safeguard against future authoritarian and unilateral actions by the administration towards students and student groups.

23. The University Senate is a policy-making body composed of representatives from the university administration, faculty and other university staff, members from affiliated

institutions, students, and alumni and was established “to concretize a body of self-governance that is able to check administrative power.”

24. The University Senate is responsible for, among other duties, setting university-wide policies and “promulgat[ing] a code of conduct for faculty, students, and staff and provide for its enforcement.” Any amendments to the Rules of University Conduct require the approval of the University Senate and the university’s trustees.

25. Similarly, the SGB was created “to meet student demands for a self-governing student caucus” (*See Columbia University, About SGB - Student Governing Board, <https://web.archive.org/web/20231203051955/https://www.columbia.edu/cu/sgb/about.html>* [accessed Mar. 11, 2024]).

26. The oldest of Columbia’s governing boards, the SGB is responsible for recognizing and directly supervising all student organizations that are “spiritual, ideological, political, humanitarian, cultural, or activist” in nature.¹ The “SGB general body” is comprised of representative delegates from all member groups and falls under the Undergraduate Student Life² (“USL”). Each SGB member group has an assigned USL advisor.

¹ Subsequently, four additional governing boards were established at Columbia University, each overseeing student groups with focus areas outside of the SGB’s. The additional governing boards are: the Activities Board at Columbia (ABC), the Columbia College Student Council (CCSC), the Engineering Student Council (ESC), and the General Studies Student Council (GSSC) (Columbia University, *Undergraduate Student Life*, <https://www.cc-seas.columbia.edu/adjudication> [accessed Mar. 8, 2024]). Each governing board is responsible for directly supervising their member student groups and have their own applicable disciplinary processes (*see e.g.*, Columbia University, ABC Code of Conduct, <https://abc.studentgroups.columbia.edu/content/code-conduct> [accessed Mar. 9, 2024]).

² This office has gone through various iterations, including the Office of Student Group Advising and the Office of Civic Action and Engagement (*see Undergraduate Student Life, Student Clubs and Organization, <https://www.cc-seas.columbia.edu/studentlife/resources>* [accessed Mar. 7, 2024] [describing the office’s transition to the USL]; Student Governing Board, About SGB, <http://www.columbia.edu/cu/sgb/about.html> [accessed Mar. 7, 2024] [describing the change from the OSGA to the OCAE]).

27. The SGB, through an elected “Executive Board” comprised of students, oversees the “discipline of its member groups in the event of constitutional violations and intragroup and intergroup conflict.”

28. The SGB also hears complaints relating to violations of university rules by its member groups, including violations of university rules governing events sponsored by student groups on campus.

29. The SGB is “authorized to handle discipline and enforce rules for SGB groups.” Accordingly, the SGB “may discipline misbehaving SGB groups through restrictions on their budgets and activities,” including through suspensions.

30. The SGB Executive Board maintains a robust adjudicatory process as part of its disciplinary adjudications and is advised by the University Student Life (“USL”).

31. Columbia has also established the Student Group Adjudication Board (“SGAB”) to adjudicate disciplinary actions against student organizations. The SGAB is a disciplinary hearing board and “peer-to-peer process that consists of trained students elected” from each of the five governing boards, “supported by” three university staff members.

32. Example of SGAB cases include “[f]inancial policy violations,” travel policy violations, “press policy” violations, and event-policy violations like “advertising events that are not confirmed.”

33. Governing boards like the SGB and the SGAB only adjudicate complaints of student group misbehavior and thus do not handle any individual-student disciplinary matter.³

³ Investigations and discipline of an individual student’s academic or behavioral misconduct, including violations of university rules or local, State, or Federal laws, are subject to other university processes, such as the Dean’s Discipline process (*see* Columbia University, *Dean’s Discipline*, <https://bulletin.columbia.edu/columbia-college/standards/> [accessed Mar. 9, 2024]; If an individual student is alleged to have violated the University Rules of Conduct, however, they are afforded a robust disciplinary process contained therein, which may include informal resolution, administrative resolution (akin to a plea), or a formal hearing by another adjudicative body, the University Judicial Board.

Students for Justice in Palestine and Jewish Voice for Peace

34. Columbia SJP is a part of a nationwide student movement advocating for Palestinian liberation, human rights, and self-determination. SJP became an officially recognized student group over a decade ago.

35. In that time, the group has worked to raise awareness about Palestinian history, cultures, and struggle for freedoms, as well as advocate in support of the Boycott, Divestment, and Sanctions (“BDS”) movement on campus. Over the years, SJP has organized book clubs, demonstrations, vigils, guest speakers, and film screenings.

36. Petitioner Maryam Alwan is a member and organizer within SJP and a person of Palestinian descent. She joined SJP in spring 2023 to advocate for the humanity and rights of Palestinian people worldwide.

37. Columbia-Barnard Jewish Voice for Peace is the Columbia chapter of Jewish Voice for Peace, which describes itself as the largest Jewish anti-Zionist organization in the world. JVP became an officially recognized group at Columbia in 2014.

38. JVP has two missions: to create a safe community and cultural space for anti-Zionist Jews and to be an activist group that is inspired by Jewish traditions to fight for Palestinian rights while centering Palestinian voices. In support of these missions, JVP has organized cultural events like seders and shabbat dinners, actions such as demonstrations and vigils, and has advocated in support of the BDS movement.

39. Petitioner Cameron Jones is a member and organizer for JVP. He was motivated to join JVP in September 2022 by his personal experiences as an anti-Zionist Jew, and he has valued having a space to celebrate his religion and advocate for Palestinian liberation.

40. As political student groups, SJP and JVP are recognized by and fall under the direct supervision of the SGB and the SGAB.

41. SJP and JVP are part of a broad coalition of over 20 student organizations across Columbia, each of its four affiliated undergraduate institutions, and sixteen graduate schools called Columbia University Apartheid Divest (“CUAD”).

COLUMBIA’S WELL-ESTABLISHED POLICIES AND PRACTICES REGARDING STUDENT GROUPS

University policies and practices governing student-group activity

42. Student groups recognized by Columbia are subject to their governing board’s constitutions and by-laws and university rules, including the Student Group Event Policy and Procedure and the University Event Policy (collectively, “event policies”).

43. The event policies outline various requirements for things like obtaining event approval, securing event space, and having guests. The event policies apply to protests and demonstrations and prohibit students from advertising or hosting events prior to approval.

44. Sometime in October 2023, university administrators unilaterally amended pre-existing event policies without consulting with or approval by the University Senate but did not purport to replace governing procedures under SGB and SGAB for investigating and sanctioning student groups alleged to have violated university policies.

45. The event policies were amended yet again sometime in 2024, in consultation with the University Senate, to ensure that they were consistent with governing procedures and university rules, including the Rules of University Conduct.

The SGB Judiciary Process

46. Complaints against a group governed by SGB may be initiated by an officer of the university or a student in another member group. First, a letter detailing the complaint and

providing supporting evidence must be submitted to the SGB Executive Board. The SGB Executive Board then reviews and votes on whether to hear the complaint or refer it to another disciplinary body, such as the SGAB.

47. If the SGB Executive Board decides to hear a case, it will inform the defendant student group of the complaint against them, provide a copy of the original complaint and the supporting evidence, and schedule a mediation. The defendant student group is assigned a representative to serve as an advisor during the mediation. If mediation is unsuccessful, a hearing is scheduled before members of the SGB executive board.

48. To find a student group “guilty,” a majority of the hearing committee members must sign on to a written opinion regarding the finding.

49. A guilty finding may lead to discipline. The sanction must be agreed upon by members of the hearing committee, and the defendant student group must be provided with a written justification for the specific sanction.

50. Possible sanctions include a warning, a fine, ineligibility to receive a budget for a period, loss of ability to reserve space for a period of time, suspension, and derecognition.

51. A student group is entitled to appeal any sanction to the SGB “Town Hall,” which are regular meetings of the SGB’s general body. Bases for appeal include: new substantial information unavailable at the time of the hearing; the SGB Executive Board did not follow proper procedures or violated the SGB Constitution in making its decision; or the sanction was disproportionate to the offense.

The SGAB’s Disciplinary Process

52. In some instances, the SGB may refer a complaint to the SGAB, which also can receive complaints from “[m]embers of the Columbia community” reported to it through a

“General Concern Report” form. The SGAB reviews the complaint and determines the appropriate response for resolution, including whether the matter should be resolved through the Rules of University Conduct or Dean’s Discipline process.

53. If the case remains with the SGAB, and depending on the allegations, the SGAB can proceed with an informal resolution with the student group’s adviser or seek a resolution through a formal SGAB hearing.

54. As with SGB hearings, SGAB hearings must conclude with a written explanation of the board’s findings of fact, the outcome of the hearing, and the rationale for the decision. Possible sanctions include warning, loss of space reservation abilities, group probation, suspension, or group de-recognition.

55. A student organization can appeal SGAB decisions based on one of the following reasons: new information that was unavailable at the time of the hearing has arisen; concerns with the process that materially affect the outcome; and the sanction is disproportionate to the nature of the offense. The SGAB will then provide the student group with a written decision within five business days of receiving the appeal.

The November 9 Peaceful Protest and November 10 Suspension of Students for Justice in Palestine and Jewish Voice for Peace at Columbia

56. On November 9, 2023, students across the United States responded to an internationally organized “call to action” to engage in peaceful protest activity calling for an end to Israel’s current military campaign in the Gaza Strip, which at that point had claimed over 10,000 Palestinian lives and which today has claimed over 30,000 Palestinian lives.

57. On the Columbia campus, CUAD, which is a coalition of student organizations like SJP, JVP, Palestinian Student Union – Dar – (“Dar”), Somali Student Association, Asian American Alliance, African Student Union, Student Organization of Latinxs, and Barnard-Columbia

Abolition Collective (“BCAC”)—planned and hosted a peaceful demonstration and temporary art installation.

58. As part of CUAD’s planning efforts, the coalition created a flyer inviting students to join their demonstration (*see* Figure 1 below). Numerous student-group members of CUAD, including SJP, JVP, Dar, and BCAC promoted the event via social media and other channels.



Figure 1 – CUAD Flyer for the November 9, 2023 Demonstration

59. Over 200 students, including the individual petitioners, attended the demonstration. For about two hours the students stood in unison at Low Steps listening to student speakers. The students chanted political slogans like “Ceasefire Now!” and “Stop Bombing Gaza!” and conducted a symbolic “die-in”—a form of street theater where people lie on the ground to symbolize lives tragically lost.

60. Students also engaged with the art installation, writing the names of the over 10,000 Palestinians killed in Gaza at that point.

61. The demonstration ended with the students singing “We Shall Overcome” in unison.

62. Columbia was aware that the event was organized, advertised, hosted, and attended by CUAD's broad coalition of student groups given CUAD had delivered a letter to the university explaining as much on November 9, 2023.

63. On November 10, 2023, members of SJP and JVP received an email from the Dean of Undergraduate Student Life, Cristen Scully Kromm, with the subject line "Decision and Notification." The email stated, in relevant part:

Columbia University is suspending Students for Justice in Palestine (SJP) and Jewish Voice for Peace (JVP) as official student groups through the end of the fall term. This 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.

Suspension means the two groups will not be eligible to hold events on campus or receive University funding. Lifting the suspension will be contingent on the two groups demonstrating a commitment to compliance with university policies and engaging in consultations at a group leadership level with university officials.

64. The email was a forwarded message on behalf of Columbia's Executive Vice President Gerald Rosberg, ("VP Rosberg") as the "Chairman of the Special Committee on Campus Safety" ("the Committee").

65. The university has since renewed SJP and JVP's suspension past the fall term.

66. No other student-group member of CUAD was sanctioned for organizing, advertising, or hosting the November 9 demonstration. Indeed, no action was taken against any of the other coalition member groups.

67. In a now-removed section of the university's "Event Policy and Campus Resources FAQ," the university described the Committee as a "temporary entity [and] mechanism to aid the

administration in coordinating on campus . . . to address the deluge of operational issues around security that have arisen since October 7, 2023.”⁴

68. The university has expressly stated that the Committee is not a policy-making entity and reportedly meets daily.

69. It was only as a result of the suspension notice that the petitioners, the University Senate, and broader Columbia University Community learned of the Committee’s existence.

70. However, the Petitioner students had previously been warned by their student advisor about a so-called “protest-shutting-down committee” that had been regularly meeting and purportedly waiting for SJP, especially, to make a wrong move.

71. After news broke about the Committee’s existence following its suspension of SJP and JVP, members of the Columbia University community raised concerns about the lack of transparency around the committee’s composition and function, the process in which the committee had been established, the committee’s suspension of SJP and JVP, and the committee’s authority to unilaterally impose discipline on student groups.

72. The university subsequently acknowledged these concerns and attempted to address them at a November 17, 2023 University Senate Plenary meeting. At the meeting, VP Rosberg confirmed that the committee met daily, had been established in the wake of the events of October 7 in Israel-Palestine, and included representatives from “University Life, Public Safety, . . . the Provost’s Office, and . . . faculty.” He also acknowledged the transparency concerns and said that “there would be discussion about how to make this committee as transparent as possible.”

73. In answering questions about the committee’s suspension of SJP and JVP, the university asserted that the decision to suspend SJP and JVP “came as a recommendation during

⁴ This description was the university’s response to the question “What is the Special Committee on Campus Safety?”; it is unclear why or when the university removed this section (*see id.*).

the process of dealing with student groups. . . . [And VP Rosberg] and others were involved in formulating a recommendation that went to the senior leadership of the University, which approved” the decision. However, the SGB and SGAB had no involvement in the university’s decision to suspend SJP and JVP.

74. Immediately after issuing the suspension decision to SJP and JVP on November 10, the university issued a press statement about the decision on the Columbia News website from Vice President Rosberg, as the Committee’s chair. The press statement mirrored the language in the November 10 email sent to the students, including accusations that the demonstration “included threatening rhetoric and intimidation.”

75. Upon information and belief, Columbia has rarely publicly announced a decision to suspend a student group. The public suspension decision garnered local, national, and international media attention.

76. The university’s public accusations that SJP and JVP had engaged in “threatening rhetoric and intimidation” deeply upset the Petitioners who grew concerned that the university’s characterizations would paint the organizations and individual students as violent and significantly increase their risk of being doxxed or otherwise harmed or targeted by members of the public.

77. This language also appeared to invoke violations of the Rules of University Conduct, which prohibit speech that “constitutes a genuine threat of harassment” and prompted the petitioners to inquire whether the university was accusing them of violating those rules.

78. When pressed to specify which of the student groups’ actions constituted “threatening rhetoric and intimidation,” VP Rosberg proffered that protestors’ accusations that Israel was “a racist state committing genocide” and “is an apartheid state” could upset some people and “seem . . . like an incitement of violence.”

79. However, VP Rosberg clarified that the student groups did not violate the Rules of University Conduct and were not suspended for any violation thereof.

80. Prior to the student groups' suspension, Columbia was facing both internal and external pressure to crack down on pro-Palestinian demonstrations and student groups, specifically SJP and JVP (*see e.g.*, Sharon Otterman, *Columbia University Postpones a Fund-Raiser as Divisions Over War Deepen*, NY Times, Oct. 24, 2023, <https://www.nytimes.com/2023/10/24/nyregion/columbia-giving-day-israel-hamas-war.html> [accessed Mar. 11, 2024] [describing the “anger among Jewish alumni and donors against elite American colleges” as captured by an impassioned speech in which an Columbia professor called the university president an “coward” for “refusing to stand up to” student protestors]).

81. One email campaign that was started by a Columbia professor and had been circulating within the Columbia community specifically called for the university to disband SJP, labeling it a “terrorist” and “antisemitic” organization.

82. And in October 2023, billionaire alum Leon Cooperman threatened to suspend all donations to the university over the student protests of Israel’s military campaign in Gaza.

83. Indeed, that month the university’s donor relations office had been inundated with emails from donors and others condemning the university for failing to crack down on pro-Palestinian advocacy and began to track them.

84. That same month, billionaire Henry Swieca resigned from the Columbia Business School board over his indignation that the university was allowing “blatantly anti-Jewish student groups and professors” to “operate with complete impunity.”

85. The suspensions have had a clear impact on both the student groups as a whole and the members individually, including petitioners Alwan and Jones. In addition to JVP and SJP's

organizing efforts, the student groups also serve as a cultural and intellectual home for likeminded Columbia students.

86. The suspension cuts off both SJP and JVP from the ability to access their university funding and prohibits them from booking rooms or event space. The experience of the suspension has ultimately alienated the students from the Columbia community.

CAUSES OF ACTION UNDER ARTICLE 78

87. The petitioners repeat and reallege paragraphs 1-86 hereof as if fully set forth herein.

88. Article 78 of the New York State Civil Practice Law and Rules is the appropriate method for review of private university disciplinary decisions.

89. In failing to substantially comply with its own policies, procedures, and customary practices for the discipline of student groups, Columbia University acted arbitrarily and capriciously in violation of Article 78.

90. In issuing a sanction that was disproportionate to the alleged offense in light of the circumstances, Columbia University acted arbitrarily and capriciously in violation of Article 78.

91. The petitioners have no other remedy at law.

92. The petition is timely under CPLR § 217.

REQUESTED RELIEF

WHEREFORE, the petitioners seek judgment pursuant to CLPR § 7806:

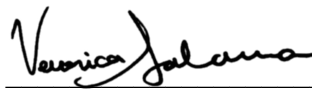
- (1) Assume jurisdiction over this matter;
- (2) Declare that the respondents' November 10, 2023 suspensions of SJP and JVP violated Article 78 of the New York State Civil Practice Law and Rules.

- (3) Order the respondents to reverse and annul the November 10, 2023 suspensions of SJP and JVP and to restore all benefits, including funds, denied as a result of the suspensions;
- (4) Award attorneys' fees and costs to petitioners; and
- (5) Grant such other relief as the Court deems just and proper.

Dated: March 11, 2024
New York, New York

Respectfully submitted,

NEW YORK CIVIL LIBERTIES UNION
FOUNDATION



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Of Counsel

VERIFICATION

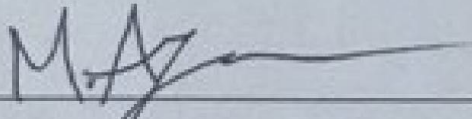
STATE OF NEW YORK)

) ss:

COUNTY OF NEW YORK)

I, Maryam Alwan, being duly sworn, deposes and says that:

1. I am one of the Petitioners in this proceeding. I make this Verification pursuant to CPL §3020(d).
2. I have read the attached Verified Petition and know its contents.
3. All of the material allegations of the Verified Petition are true to my personal knowledge or upon information and belief. As to those statements that are based upon information and belief, I believe those statements to be true.

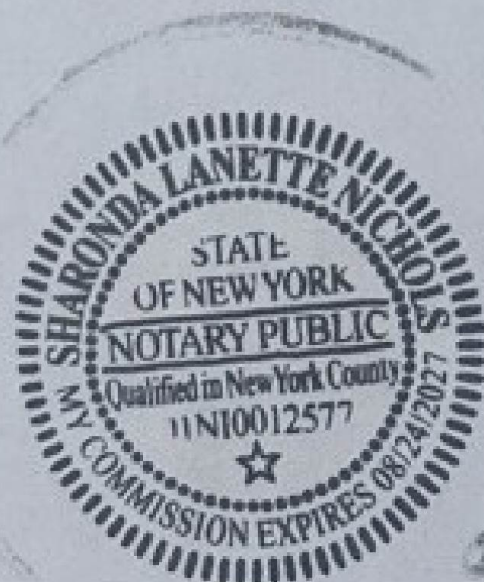


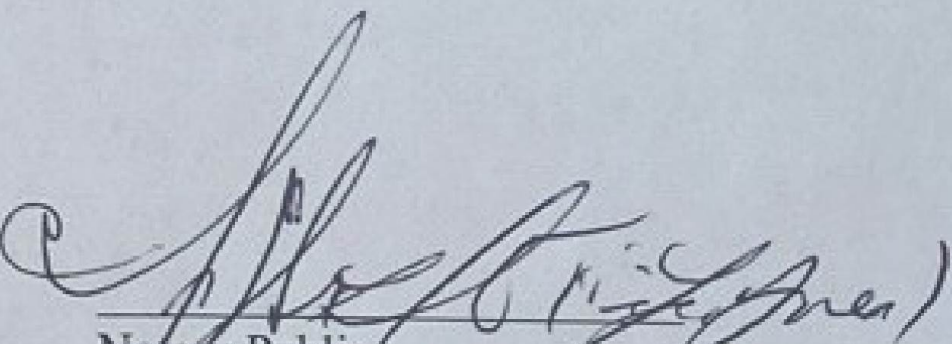
 Maryam Alwan

Dated: March 7, 2024

New York, New York

Sworn and subscribed to me
this 8 day of March, 2024





 Notary Public

VERIFICATION

STATE OF NEW YORK)

) ss:

COUNTY OF NEW YORK)

I, Cameron Jones, being duly sworn, deposes and says that:

- 1. I am one of the Petitioners in this proceeding. I make this Verification pursuant to CPL §3020(d).
- 2. I have read the attached Verified Petition and know its contents.
- 3. All of the material allegations of the Verified Petition are true to my personal knowledge or upon information and belief. As to those statements that are based upon information and belief, I believe those statements to be true.

Cameron Alex Jones

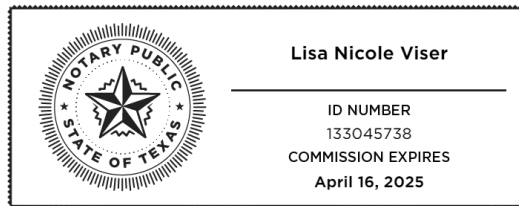
Cameron Jones

Dated: March 10, 2024

New York, New York

Texas Harris

Sworn and subscribed to me
this 10th day of March, 2024
by Cameron Alex Jones



Lisa Nicole Viser

Notary Public, State of Texas

Lisa Nicole Viser

Electronically signed and notarized online using the Proof platform.