

student groups advocating on the Middle Eastern conflict, including ones linked to threats, are not similarly flagged.

- (b) Beginning last Fall, Defendants invoked vague or non-existent University rules and guidelines to force peaceful demonstrations involving SJP-Pitt to move off campus.
- (c) In December, Defendants attempted to shut down an SJP-Pitt library study group because members wore pro-Palestinian symbols, like keffiyehs and draped Palestinian flags, and adorned their laptops and backpacks with small political signs, in a non-disruptive, silent display of political expression.
- (d) This past January, Defendants forced SJP-Pitt to rename an event to, allegedly, avoid offending people, and then relocated the event at the last minute to a less desirable venue.
- (e) Also this past January, Defendants initiated disciplinary action seeking to suspend SJP-Pitt's university registration over the passive library display, alleging vaguely that SJP-Pitt disregarded directives and violated unidentified rules and policies. Those proceedings remain unresolved.
- (f) On March 18, Defendants placed SJP-Pitt on temporary and indefinite suspension, significantly curtailing its ability to continue on-campus activism. The suspension, which is still in place, was not issued in response to SJP-Pitt's expression in the library, but to a February 4 open letter signed by SJP-Pitt and 72 other university and community groups criticizing Pitt's disciplinary actions, including the misconduct proceedings.

- (g) On March 19, Pitt threatened SJP-Pitt with additional discipline for promoting an off-campus demonstration against the resumption of the war in Gaza.
- (h) On April 8, Pitt reinstated the disciplinary charges over the library study-in, and added new charges over the February 4 open letter. Those proceedings are just beginning, but SJP remains on interim suspension.

3. Throughout its year of harassment, Pitt has failed to link SJP-Pitt's alleged misconduct with specific University rules, policies or guidelines. Defendants have repeatedly invoked the mantra that SJP-Pitt is engaged in an "event in a non-reservable space," but Pitt has no definition of "event," and the so-called non-reservable spaces they have identified are either reservable, open to all students, or First-Amendment-protected public forums where the University's power to suppress political expression is limited. The First Amendment protected the students who wore black armbands to school in a silent protest against the Vietnam War¹ and the Black civil rights demonstrators who were arrested for silently protesting discrimination in a segregated library.² As the U.S. Court of Appeals for the Third Circuit noted recently, these are "[p]aradigms of protected conduct-based speech."³ The First Amendment protects SJP-Pitt's expression, including peaceful outdoor demonstrations in public forums, non-disruptive and silent political expression in the library, open letters to campus administrators criticizing their treatment of SJP, and social media posts promoting both on- and off-campus demonstrations.

4. Pitt has transgressed clear First Amendment boundaries by 1) initiating meritless disciplinary proceedings against SJP-Pitt and threatening suspension over silent political expression in the library; 2) suspending SJP-Pitt for sharing an open, community letter criticizing

¹ See *Tinker v. Des Moines Indep. Cmty. Sch. Dist.*, 393 U.S. 503, 505-06 (1969).

² See *Brown v. Louisiana*, 383 U.S. 131, 141-42 (1966).

³ *Falcone v. Dickstein*, 92 F.4th 193, 206 n.9 (3d Cir. 2024); see also *B.H. ex rel. Hawk v. Easton Area Sch. Dist.*, 725 F.3d 293, 308 (3d Cir. 2013) (citing *Tinker*, *supra*, and its progeny).

the University's treatment of SJP-Pitt; 3) using intimidation to silence SJP-Pitt's off-campus speech; and 4) relocating away from campus three peaceful demonstrations involving SJP-Pitt. Pitt's actions have irreparably harmed, and continue to irreparably harm, SJP-Pitt's First Amendment rights to expression and assembly. "[T]he vigilant protection of constitutional freedoms is nowhere more vital than in the community of American schools,"⁴ and this Court's emergent injunctive relief is needed to safeguard SJP-Pitt's First Amendment rights.

I. JURISDICTION AND VENUE

5. This Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331, 1343(a)(3) and (4), and 1367. Declaratory relief is authorized by 28 U.S.C. § 2201 and Federal Rule of Civil Procedure 57. Injunctive relief is authorized by Federal Rule of Civil Procedure 65.

6. This Court has personal jurisdiction over Defendants, all of whom are located and/or work in the Western District of Pennsylvania.

7. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b) because Defendants are located in this District and the events or omissions giving rise to this suit occurred, and are occurring, in Pittsburgh.

II. PARTIES

8. Plaintiff, Students for Justice in Palestine at Pitt ("SJP-Pitt"), is an unincorporated association of likeminded students attending the University of Pittsburgh who are committed to raising demands for freedom, justice, and equality for the Palestinian people. It is one of about 350 chapters of the national Students for Justice in Palestine organization. On March 18, 2025, the University suspended SJP-Pitt's club registration and directed "a cessation of organizational operations." Ex. 26. On or about March 29, 2025, the group changed its name from "Students for

⁴ *Healy v. James*, 408 U.S. 169, 180 (1972) (citation omitted).

Justice in Palestine at Pitt” to “Students for Justice in Palestine—Pittsburgh” in order to operate as an unincorporated association that is not a University registered student organization.⁵

9. According to SJP-Pitt’s constitution, filed with the University, the group’s purpose is “to provide the Pitt community with a better understanding of the Palestinian-Israeli conflict through advocacy, awareness, and charity in the hopes of attaining peace in the region and freedom for Palestinians.” And the constitution identifies the following activities:

This group will organize events throughout the year such as hosting speakers, movie showings, cultural festivals, and fundraisers in order to educate and raise awareness regarding the issues in the Palestinian region. This group will also participate in events promoting peace and justice in coordination with other Palestinian solidarity organizations within the Pittsburgh area. This group may also organize petitions and pass out leaflets with the intent of educating the public.

10. Pitt is established by Pennsylvania law as an instrumentality of the Commonwealth to serve as a state-related university in the higher education system. *See* 24 Pa. Stat. Ann. § 2510-201, *et seq.* As a state-related university, it is subject to the Constitution of the United States, including but not limited to the First and Fourteenth Amendments. Pitt is responsible, as an organizational entity, for the actions and harms alleged in this lawsuit because all acts were committed, directed, or ratified by official policy makers with authority to bind the University.

11. Defendant Joan Gabel serves as the Chancellor for the University of Pittsburgh. She was at all times hereafter mentioned acting under color of state law. Chancellor Gabel is sued in her individual and official capacities.

⁵ The parties to this litigation agreed during pre-filing discussions that Plaintiff’s new name was acceptable during the suspension period because it does not imply University endorsement. Plaintiff changed its social-media handle accordingly, from “@sjp_pitt” to “@sjp_pgh.” This document henceforth will refer to the Pittsburgh-based chapter simply as “SJP-Pitt” since the University still refers to the group as such.

12. Defendant Marlin Nabors is the Associate Vice Provost and Dean of Students for the University of Pittsburgh. At all times hereinafter mentioned, he was operating under color of state law. He is sued in his individual and official capacities.

13. Defendant Karin Asher is the Assistant Dean of Student Engagement and Professional Development at the University of Pittsburgh. She was at all times hereafter mentioned acting under color of state law. Dr. Asher is sued in her individual and official capacities.

14. Defendant DaVaughn Vincent-Bryan is Pitt's Director of Involvement and Student Unions. At all times hereinafter mentioned, he was operating under color of state law. He is sued in his individual and official capacities.

15. Defendant Matthew Landy is the Director of Student Conduct at the University of Pittsburgh. At all times hereinafter mentioned, he was operating under color of state law. He is sued in his individual and official capacities.

16. Defendant Jamey Mentzer is the Associate Director of Student Conduct at the University of Pittsburgh. At all times hereinafter mentioned, he was operating under color of state law. He is sued in his individual and official capacities.

III. FACTUAL BACKGROUND

A. SJP-Pitt's Activity at Pitt Increased After October 7, 2023

17. SJP-Pitt has been a "registered student organization" at Pitt since at least 2009.

18. Organizations enjoy many benefits from registered status. *See* Ex. 1. University of Pittsburgh, Student Organization Resource Center (SORC), Privileges of Registration (available at <https://www.studentaffairs.pitt.edu/student-organization-resource-center/start-new-student-organization/registration-guidelines>). Privileges of club registration include access to university

facilities, equipment and services; funding and eligibility to collect dues and host fundraising events; eligibility to be listed in university publications, participate in university activities, use university spaces to host various programs, including guest speakers, panel discussions, and rallies; permission to distribute literature and organizational materials on campus, including through university mail; eligibility to post informational materials on university controlled bulletin boards; and other services and supports.

19. While SJP-Pitt has long been a registered university organization, it was largely dormant immediately prior to October 7, 2023, when Israel began to retaliate against and attack Palestinians living in Gaza over a Hamas attack that left more than one thousand Israelis dead. Shortly thereafter, more students joined SJP-Pitt, new board members were added, and it became a more visible presence on Pitt's campus, in the surrounding community, and on social media.

20. For the remainder of the 2023-24 school year and the fall semester of the 2024-25 year, SJP-Pitt sponsored, co-sponsored, or promoted peaceful demonstrations on or near the campus to raise awareness of the Palestinian peoples' suffering, sponsored six on-campus speaker events and many more educational events, and maintained a vibrant social-media presence that commented on topical news and promoted events in support of the Palestinian people.

21. Throughout this period, SJP-Pitt decried violence against Pitt students. For example, in response to an August 30, 2024 criminal assault by a 52-year-old man on two Jewish Pitt students near the campus in the Oakland neighborhood, the organization posted the following social-media statement on September 1:

Students for Justice in Palestine at the University of Pittsburgh unequivocally condemns the act of violence that took place on Friday, August 30 against two Jewish students. We wholly reject all forms of hate, including antisemitism, Islamophobia, anti-Palestinian racism, and white supremacy, and denounce the misappropriation of Palestinian symbols by individuals unaffiliated with the movement for a liberated Palestine. We reaffirm that the University of Pittsburgh

campus should be an inclusive and safe space for students of all backgrounds. Our thoughts are with the students harmed by this attack, and we wish them a safe and speedy recovery.

Ex. 2.

B. SJP-Pitt’s Increased Visibility Attracted Opposition and Hostile Threats from Opposing Pitt-Sponsored Student Groups and External Organizations.

22. During the summer of 2024, Congress and other political leaders began pressing universities to curtail students’ pro-Palestine activism on campus. Contentious hearings in the U.S. House of Representatives led to the resignation of two major universities’ presidents, who were accused of not taking sufficient measures to address anti-Semitism on campus, including for not punishing pro-Palestinian student demonstrators more harshly. *See* Katherine Knot, et al, *College Leaders Testify on Capitol Hill*, INSIDE HIGHER ED (May 23, 2024), <https://www.insidehighered.com/news/government/2024/05/23/live-congress-grills-ucla-rutgers-northwestern-leaders>.

23. SJP-Pitt’s activism attracted hostility and counter demonstrations, mostly from two other University-registered student organizations: Students Supporting Israel (“SSI”) and Student Coalition for Israel at Pitt (“SCIP”).

24. At the beginning of the 2024-25 school year, verbal attacks on SJP-Pitt increased on campus, on social media, and in the press.

25. In early October, for instance, SSI collaborated with a non-university organization, Betar USA, on an Instagram post and Change.org petition urging Pitt to ban SJP-Pitt from campus.

Ex. 3. The messages claimed SJP-Pitt supports terrorism, promotes violence, and intimated that SJP-Pitt instigated “3 assaults on Jewish [Pitt] students.” *Id.* Fliers posted on utility poles and on University-property claimed “SJP supports terrorism”. Ex. 4.

26. Around this time, Betar USA posted messages on its Instagram account specifically targeting SJP-Pitt.⁶ One message stated that Betar was “recruiting...in Pittsburgh” and invited sympathizers to join them “on campus.” Ex. 3. The message continued, “@sjp_pitt our director @the_urbanwarrior looks forward to giving you a beeper.” The “beeper” reference was viewed by many as a thinly veiled death threat because it alluded to a September 17 Israeli attack that killed at least 37 people and wounded nearly 3,000 in Lebanon by detonating beepers it had distributed to people, including civilians and children.⁷ Upon information and belief, Instagram temporarily banned Betar USA over the threats to SJP-Pitt.

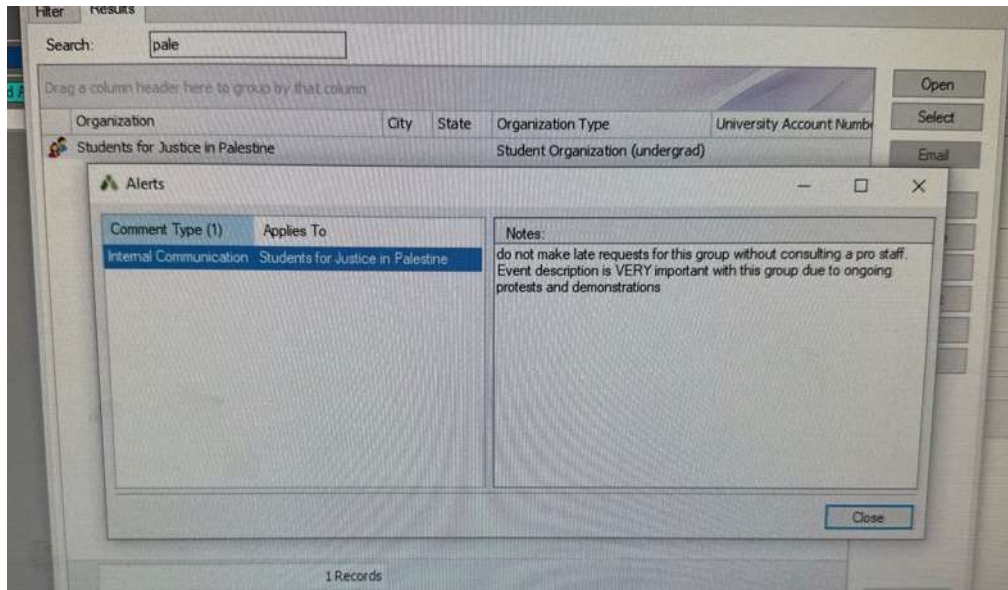
27. On October 24, a person subsequently identified as a member of SCIP’s executive board, placed a note on a former SJP-Pitt board leader’s car, saying, “Sinwar is dead you MF! Israel Will Always Be. Fuck you! Jew hating BITCH.” Ex. 5. Upon information and belief, Pitt investigated but declined to take disciplinary action against the individual or SCIP.

C. A Year Ago, Pitt Flagged All SJP-Pitt Event Applications for Elevated Scrutiny

28. A Pitt computer system tracking events sponsored by registered student organizations includes an internal “alert” for SJP-Pitt. Ex. 6. The alert, which is not viewable publicly, reads as follow: “Internal Communication Students for Justice in Palestine.” The note accompanying that entry reads, “do not make late requests for this group without consulting a pro staff. Event description is VERY important with this group due to ongoing protests and demonstrations.” A screenshot of the alert is below.

⁶ See Will Oremus, *A militant Zionist group threatens activists online with a ‘deport list’*, WASH. POST (Mar. 29, 2025), available at <https://www.washingtonpost.com/technology/2025/03/29/zionist-palestinians-deportations-x/>.

⁷ See Amnesty International, *Lebanon: Establish international investigation into deadly attacks using exploding portable devices* (Sept. 20, 2024), <https://www.amnesty.org/en/latest/news/2024/09/lebanon-establish-international-investigation-into-deadly-attacks-using-exploding-portable-devices/>.



29. This alert has been affixed to SJP-Pitt’s database entry since at least April 2024. It was in effect as late as April 8, 2025.

30. Upon information and belief, very few registered student organizations have such an alert affixed to their entry in the events database. SSI and SCIP do not.

D. Pitt Suppresses SJP-Pitt’s Campus Demonstrations

31. Meanwhile, as these attacks on SJP-Pitt by University-sponsored student organizations and outside entities were unfolding, Pitt began a series of actions that interfered with SJP-Pitt’s operations and stifled their political expression.

32. In September and October, 2024, Defendants disrupted and then relocated three peaceful demonstrations involving SJP-Pitt from outdoor on-campus spaces to off-campus locations. The forced relocations moved protesters further away from their intended audience, namely, members of the Pitt community. SJP-Pitt sponsored only one of the three demonstrations, and merely promoted and joined the other two rallies.

33. For instance, on September 24, 2024, the Assistant Dean of Student Engagement and Professional Development, Defendant Karin Asher, emailed SJP-Pitt leaders asserting that

even though SJP-Pitt was not the “event organizer[.]” of a demonstration advertised for the next day, entitled “Urgent Protest: Hands Off Gaza and Lebanon,” “as a registered student organization, it is [SJP-Pitt’s] obligation to uphold University policies and guidelines when [SJP-Pitt] engage[s] with events.” Ex. 7(Asher 9/24/24 17:56 email). Asher confusingly wrote that the space on the lawn in front of the Cathedral of Learning (“Cathedral”) was “non-reservable space,” but noted that SJP-Pitt had not made a reservation. *Id.*

34. The next day, September 25, Pitt Police forced about 100 students and non-students engaged in a peaceful demonstration outside the Cathedral to move off campus, across the street to Schenley Plaza, a City of Pittsburgh owned public forum. The relocation limited SJP-Pitt members’ and others’ ability to communicate their message to Pitt students and faculty. The Schenley Plaza area is further removed from where Pitt students and faculty typically congregate and pass.

35. On October 7, Asher sent another email threatening SJP-Pitt leaders with sanctions for unspecified failures to comply with university policies in announcing events for later in the week. *See* Ex. 8 (Asher 10/07/24 21:48).

36. On October 9, Pitt police ordered about 50 people at an SJP-Pitt co-sponsored rally outside the William Pitt Student Union (“WPU”) to relocate across the street to non-Pitt property, at the Soldiers and Sailors Memorial Hall & Museum. The rally on the plaza outside the WPU was peaceful and not disrupting class or interfering with ingress or egress at the building. Yet again, the off-campus space afforded SJP-Pitt less opportunities to interact with the intended audience, Pitt community members.

37. On October 10, Asher directed that a peaceful, educational “teach in,” organized by a community group but promoted and attended by SJP-Pitt members, must move off campus,

from the Cathedral lawn across the street to Schenley Plaza. Asher simply declared that they were holding an “event” in a “non-reservable” portion of the lawn, even though that area is regularly used for small demonstrations. Relocating the teach-in from campus interfered with SJP-Pitt students’ and other participants’ ability to communicate their message to Pitt community members, again.

E. Pitt Employs a Vague, Ill-Defined, Standardless System to Regulate Expression in the University’s Public Spaces

38. Defendant Asher, and other Pitt officials, have repeatedly invoked the phrase, an “event in a non-reservable space,” to decree political expression illegal. She used the phrase to justify relocating two of the three disrupted fall 2024 demonstrations, *supra*, and again in attempting to shut down the library study-in, *infra*.

39. But Pitt has failed to identify any rule or policy that defines an “event.” In an effort to justify its restriction, the University has directed SJP-Pitt to its “Demonstration and Protest Guidelines,” which vaguely define “demonstration” by stating “[a] demonstration includes any organized public gathering or activity expressing support for or opposition to an issue, person, group, idea or policy.” Ex. 9. In effect, that is a definition of a First-Amendment-protected activity. Thus, to the extent Pitt uses “event” as a proxy for demonstration, it is saying First Amendment protected expressive activities are prohibited in certain spaces.

40. But all expression cannot be banned from the spaces where Pitt and Asher have applied the “no-event” label. The protests discussed above occurred on sidewalks and sizeable grassy areas outside the Cathedral, or on the plaza outside the WPU, both of which are at least designated public forums if not traditional public forums protected by the First Amendment. Regardless of the type of public forum, government agencies’ ability to ban peaceful, non-disruptive expressive activities is sharply limited. In the case of the library, discussed *infra*, the

government cannot ban all expression, especially passive displays on clothing and belongings, even in non-public forums.

41. While government agencies can, and most do, establish permitting systems to regulate expression in public forums, Pitt has not identified any such system. The aforementioned demonstration guidelines simply state that the “University maintains the right to regulate and monitor the time, place and manner of any on-campus demonstrations as may be necessary to help ensure the safety and well-being of community members and the orderly conduct of classes and other functions of the University.” *Id.* These guidelines contain no standards to guide University regulators or members of the University community who must follow Pitt’s rules. They do not specify how many people, engaged in what activities, in what particular locations, and under which other important contextual factors constitute a “demonstration.” They do not identify which public spaces at the university are “non-reservable.” The University has a system for clubs to reserve spaces, but it is insufficiently precise or comprehensive to pass constitutional muster for a demonstration permitting system.⁸

42. In sum, Defendants cannot simply declare, *ipse dixit*, that various spaces on Pitt’s campus, including traditional and designated public forums, are speech-free zones. Moreover, regulating expressive activities under any system that confers standardless discretion violates the

⁸ University policy states that “[m]any campus spaces are available for student organizations and University departments to reserve for planned events, including demonstrations.” *Id.* at 2 ¶ 1. The policy asserts vaguely that these areas include “student union spaces, academic building rooms, outdoor plazas, and lawn spaces.” The policy then merely references “[r]eservation procedures [that] vary by building...,” and tells Pitt community members that “[i]f you cannot locate a space you are interested in, please reach out to the Student Union Operations team for assistance.” *Id.* The policy directs students seeking to make a reservation to the “EMS system,” *id.*, which stands for Event Management System. The EMS system webpage states that it “is to be used for reserving rooms in the William Pitt Union (WPU), O’Hara Student Center (OSC), Campus Recreation facilities, Schenley Quad, Towers Patio and tabling, and other designated academic buildings during evening hours. The room reservation system provides an online means for reserving and viewing student organizations’ and Student Affairs’ room reservations across campus.” See *Event Planning Resources, About Event Management System*, UNIVERSITY OF PITTSBURGH, <https://www.studentaffairs.pitt.edu/campus-programs/event-planning-resources> (last accessed Apr. 14, 2025).

First Amendment. *See, e.g., Forsyth Cnty. v. Nationalist Movement*, 505 U.S. 123, 130-31 (1992). Such systems are forbidden because they enable arbitrary and viewpoint discriminatory enforcement. Pitt has previously allowed demonstrations in the same locations as those denied to SJP-Pitt, raising the specter of viewpoint censorship.

43. In addition to the University's unreasonable, unnecessary and viewpoint-based suppression of the on-campus demonstrations involving SJP-Pitt, other University officials harassed and erected obstacles to a peaceful educational and cultural event sponsored by SJP-Pitt. Early in the fall of 2024, SJP-Pitt and another Pitt-registered student group, Jewish Students' Bund, applied to hold an "Anti-Zionist Kabbalat Shabbat" at the "Global Hub," which is affiliated with the University's Center for International Studies ("UCIS").

44. A Pitt official, UCIS's Interim Director, Dr. Allyson Delnore, asked SJP-Pitt to "reframe the title and description of the event to emphasize solidarity and community building around support for Palestine (or some other formulation that is more meaningful to you)." Ex. 10, at 16 (parenthetical in original) (Delnore 11/12/24 19:14 email).

45. SJP-Pitt leaders responded with an email offering to re-title and reframe the event as follows: "Title: Non-Zionist Shabbat Description: As we honor the enduring resilience of the Palestinian people, join SJP and Jewish Students' Bund for a potluck and an evening of reflection, prayer and conversation. This is a space to build community with other non-zionist and anti-zionist Jews, and we welcome all community members regardless of their religious affiliation." *Id.*, at 12 (SJP-Pitt 12/22/24 1:16 email).

46. On January 2, 2025, Delnore responded by thanking SJP-Pitt for "continuing to think with us through this planning process" and to alert SJP-Pitt that "*Promotion of the event will*

be largely done through your organizations' social media or other channels; you are free to frame the event as you wish." *Id.*, at 11 (Delnore 1/02/25 11:55 email) (emphasis added).

47. However, on January 13, Delnore abruptly changed her position, indicating that SJP-Pitt's framing of the event as "Anti-Zionist Shabbat" made it unsuitable for the Hub. *Id.*, at 9-10 (Delnore 1/13/25 12:53 email). SJP-Pitt's president responded to express surprise, quoting back Delnore's language from the January 2 email advising that SJP-Pitt was "free to frame the event as [they] wish." *Id.* at 8.

48. Two days later, SJP-Pitt received an email from Pitt advising that the Hub reservation was canceled for the following reason: "[g]iven that the venue for this event has changed, we are cancelling the reservation in the Global Hub." Ex. 11 (Global Hub 1/15/25 09:22 email). At this point, SJP-Pitt was re-booked to hold the event at the WPU.

49. When SJP-Pitt leaders finally met with Delnore, they were surprised that she did not mention concerns about promotional language, but instead cited lack of space to justify the move.

50. Pitt's last-minute relocation of the event, on pretextual grounds, interfered with and obstructed SJP-Pitt's event. The cancellation of the event at the Hub demonstrates Pitt officials' antipathy to SJP-Pitt's message, in this case an "Anti-Zionist Shabbat." Although the event did proceed at the WPU, that venue was less desirable and the last-minute location change caused difficulties for SJP-Pitt's organizing.

F. Pitt's Standardless Discretion Enables Viewpoint Censorship

51. Students in the past have conducted protests on the Cathedral lawn, and the building's main entrance stairs, approximately where the University directed SJP-Pitt and others to vacate and relocate off campus. Upon information and belief, participants in these demonstrations were not punished.

52. For instance, on October 7, 2022, approximately 100 students entered a “closed-off section” inside the Cathedral to protest the University’s failure to protect a sexual assault reported the preceding day. *See* Ex. 12-13. Alexandra Ross, ‘*We demand change*’: *Students protest sexual assault on campus*, THE PITT NEWS (Oct. 7, 2022) (available at <https://pittnews.com/article/175808/featured/we-demand-change-students-protest-sexual-assault-on-campus/>); Emma Folts, *Fed up with Red Zone sexual assaults, Pitt students demand safety measures*, PUBLIC SOURCE (Oct. 7, 2022) (available at <https://www.publicsource.org/red-zone-sexual-violence-university-pittsburgh-pitt-assault-cathedral-learning-protest/>). Pitt Police eventually removed the protesters to outside the building, but they remained on the Cathedral’s steps and in its vicinity. *Id.* Instead of being sanctioned or moved off campus for being an “event in a non-reservable space,” the demonstration elicited a commitment from a Pitt associate dean to meet with the group to hear their concerns. *Id.*

G. SJP-Pitt’s December 2024 Library “Study-In”

53. Early Monday morning, December 9, Pitt students, including SJP-Pitt members, took unoccupied seats at a half-dozen tables on the Hillman Library’s first floor to form a study group. The group maintained this space for approximately four days, studying for final-exams, except for a few hours when Asher evicted them.

54. Anywhere between 5 and 30 students used the study area at any given time during the four days. Many of the students were SJP-Pitt members, but they did not exclude others.

55. Throughout this period, there was plenty of room for other students to sit and study, either in this area, with the group, or elsewhere in the library, where the group of SJP-Pitt members would be out of sight.

56. During the four days, SJP-Pitt members did not chant, sing, picket, leaflet, solicit, proselytize other students or library staff, or in any way disrupt library operations. At no point during the four days did SJP-Pitt members block or otherwise interfere with any person's ability to enter or exit any University property or to study. The SJP-Pitt members studied and behaved like countless other students who visit the premises to study, because that is what they were doing.

57. The students did, however, use their study session to convey a political and cultural message in support of the Palestinian people. Many of the students wore keffiyehs, a traditional Arab scarf or headscarf, often black and white, that has become a symbol of Palestinian identity and resistance.⁹ Other students draped the red, white, green and black Palestinian flag over their shoulders.

58. Many of the students affixed little Palestinian flags or ordinary 8.5" x 11" sheets of paper bearing printed political messages on their laptop computers. Messages included "Arms Embargo Now," "Pitt Tuition \$\$\$ Funds Occupation," "No food has entered North Gaza for 66 days," "Free Palestine," "There are No Universities Left in Gaza," "Lift the Siege on Gaza Now," and "Hands off Palestine." Ex. 14. All of these messages are First Amendment protected speech.

59. The students merely engaged in silent, largely symbolic, expression, as is their right under the First Amendment to the U.S. Constitution and rulings of the U.S. Supreme Court. *See, e.g., Tinker v. Des Moines Indep. Cmty. Sch. Dist.*, 393 U.S. 503, 505-06 (1969) (extending First Amendment protections to students' wearing of black armbands in class to protest the Vietnam War). Just as Louisiana could not prosecute Black civil rights activists for a peaceful, non-disruptive demonstration against race discrimination in a public library, *see Brown v. Louisiana*,

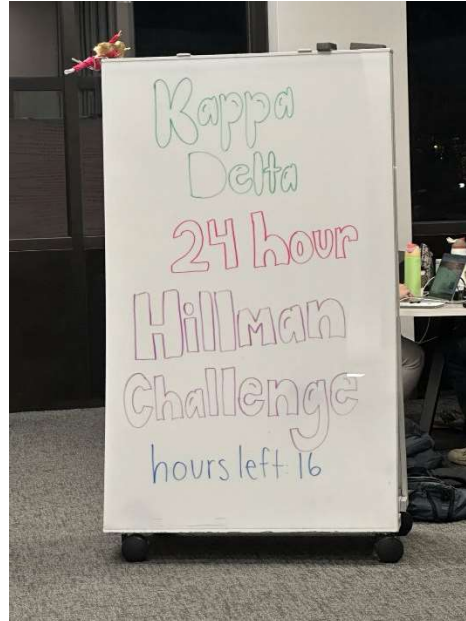
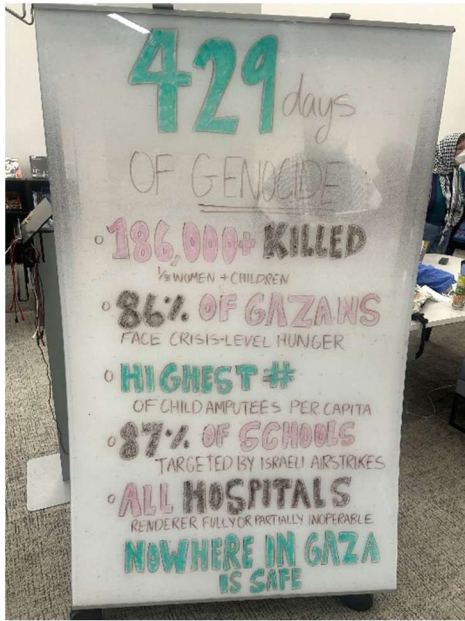
⁹ Sara, *What does the Palestinian keffiyeh symbolize?*, HIRBAWI KUFUYA (Aug. 9, 2023), <https://kufiya.org/what-does-the-palestinian-keffiyeh-symbolize/>.

383 U.S. 131 (1966), Pitt cannot sanction passive, non-disruptive pro-Palestine demonstrators for their silent political displays at Hillman Library.

60. On Monday, December 9, the group's first morning in the library, the students wrote messages on library-provided whiteboards. For example, one of the whiteboards had information taken directly from a student's class notes. It read, "429 days of GENOCIDE," "186,000+ KILLED 1/3 women + children," "86% of Gazans face crisis-level hunger," "Highest # of child amputees per capita," "87% of schools targeted by Israeli airstrikes," "All hospitals rendered fully or partially inoperable," and "Nowhere in Gaza is safe." Ex. 14. Other messages written by SJP-Pitt's members on the whiteboards had study notes unrelated to the Palestinian-Israeli conflict, including math equations and scientific jargon.

61. Other student study groups use identical whiteboards to display organizational messages, such as one by a Pitt sorority. Ex. 15. The sorority's display, which was photographed at Hillman Library on Wednesday, December 11 at 3:07 a.m., says "Kappa Delta, 24 hour Hillman Challenge, hours left: 16."

62. The two respective groups' whiteboards are identically sized and displayed; the one difference being what they say, an impermissible reason to censor one and not the other. The respective whiteboards are depicted below:



63. Despite the non-disruptive nature of SJP’s study event, by 9:00 a.m., on Monday morning at least two armed Pitt Police officers arrived to monitor students. They walked among the tables where the students sat, making their presence known.

64. Armed police, including Pitt Police, are a rarity inside the library, but throughout the four-day study-in, an armed officer regularly monitored the students, either sitting at a nearby desk or observing through glass on the floor above.

65. At about 10:00 a.m. on Monday, Defendant DaVaughn Vincent-Bryan, Pitt’s Director of Involvement and Student Unions, approached the students to advise them that they were having, to use the recurring phrase, an impermissible “event in a non-reservable space.” He pointed to their signage as an indication that they were having an “event.” The students disagreed.

66. Shortly thereafter, Defendant Asher arrived, joined by three armed Pitt police officers. Asher reiterated that the students were conducting an impermissible “event in a non-reservable space.”

67. Hillman Library does have spaces that students and others can reserve, to study or for events, but not on the first-floor common area where SJP-Pitt and other students assembled because it is open to all on a first come, first served basis. That space is therefore only non-reservable in the sense that there is no requirement that one needs to have a reservation in order to individually or collectively study in that area. Groups of students cannot “reserve” a table to the exclusion of others, but they can take whatever tables are available at the time. And that is precisely what these students did.

68. Defendant Asher raised several arguments about why the SJP-Pitt-affiliated study group’s conduct did not conform to the University or the Library rules. She said that the whiteboard was facing the “wrong direction,” objecting that it should face inward towards the table. The students complied by repositioning it. Asher claimed that the writing on the whiteboard was not related to the students’ studies, but a student pointed out that the content was copied directly from her class notes, and that other boards had mathematical and scientific equations written on them. Asher also claimed that Palestinian flags and political signs were lying on the tables impermissibly since University property cannot be used to prop up such signage. The students responded by draping the flags over their shoulders and affixing all loose signs to their laptop covers or personal belongings so that they were no longer resting on University property. Prof. Ruth Mostern, a Pitt faculty member who was in the area, argued with Asher, telling her that the students had complied with all of Asher’s directives.

69. Despite the students’ responsiveness to the alleged problems Asher identified, Asher nonetheless demanded that the students clear the area. When they did not leave promptly, she demanded that they hand over IDs to the Pitt Police. Pitt’s Student Code of Conduct makes

refusal to produce an ID a sanctionable violation. The Pitt Police officers told students they would probably go to jail if they did not produce IDs.

70. At this point, the students left the library. After they left, library staff cleaned the entire area and removed the whiteboards.

71. The students returned later in the afternoon on December 9. Minus the whiteboards, they remained in the area to study and silently express their political message, through Thursday, December 12, when the fall semester exam period ended.

72. Two email exchanges between SJP-Pitt and University officials, during the four-day study-in, highlight Defendants' inability to identify any University rule or policy allegedly violated by SJP-Pitt.

73. On Monday evening, December 9, Asher sent SJP-Pitt leaders an email chastising them for holding an "event" in a "non-reservable space," and advising them that "holding a similar event tomorrow or on additional days will result in immediate referral to the Student Conduct process for individuals involved as well as your student organization." Ex. 16 (Asher 12/09/24 22:51 email). She pointed to "several relevant guidelines and policies," none of which address the students' conduct.

74. The first of the three policies identified by Asher, the "Student Code of Conduct," has a provision that failure "without just cause" to comply with "lawful" requests by university officials is sanctionable,¹⁰ but as Prof. Mostern observed, the students complied with all of Asher's requests that morning, lawfulness notwithstanding, except that they did not leave until threatened

¹⁰ Ex. 17, at 19. *University of Pittsburgh Student Code of Conduct*, Division of Student Affairs, Ch 4, no. 36 (Aug. 19, 2023), https://www.studentaffairs.pitt.edu/sites/default/files/assets/Student%20Code%20of%20Conduct%20_Published.pdf ("Fails without just cause to comply with the lawful direction of a University official, or other lawful authority having just cause and acting in the performance of their duties and authority.")

with police action. Even though the students complied with the request to leave, it was an unlawful request because it violated the First Amendment.

75. The second Asher-identified policy was the “On Campus Demonstration and Protest Guidelines,” discussed at ¶¶ 39-41, *supra*. It states that “[m]any campus spaces are available for student organizations and University departments to reserve for planned events, including demonstrations,” but nowhere is “event” defined. Ex. 9, at 2. But the students did not “reserve” library space; they merely took unoccupied seats at empty tables, which is consistent with the library’s first-floor operations. Notably, even if the students were having a demonstration, they complied with all requirements. They did not block passage, interfere with other patrons, disrupt the educational process, use indoor sound amplification, talk loudly, cause harm to persons or property, threaten others, attach signs to university property or furniture (they corrected that the first day when told to do so), and erected no tents. *Id.*

76. The third Asher-identified policy, “Student Organization Event Planning Guidelines,” neither defines “event” nor applies to students gathering in a non-disruptive study group at the library while silently displaying political messages. *See* Ex. 18.

77. The next day, December 10, an SJP-Pitt co-president responded to Asher’s email and asked for clarification “to ensure that SJP continues to fully understand and comply with University policies.” Ex. 16, at 1. Specifically, he asked Asher to

kindly clarify what distinguishes students studying from ‘staging an event,’ and what constitutes an event more broadly? Does this distinction hinge on the scheduling of a specific time? I have reviewed the University’s Free Speech and event planning guidelines but remain unable to locate a precise definition; thus, I would appreciate it if you could share the document or policy that explicitly outlines these definitions and criteria. Understanding these nuances will help us ensure that our social media activities align with University policies moving forward.

Id.

78. Asher did not respond for nearly 48 hours, until Wednesday night, December 11. Once more, she failed to identify a policy or guideline that defines “event.” She just said events are “generally characterized” by several activities, including planning, organization with a specific purpose, and may include signage, tabling, or announcements of the purpose of the gathering. *Id.* Planning and organizing are inherent in convening any study group. The passive display of political messages, by itself, cannot render the activity illegal or make it an “event.”

79. In another email exchange, Hillman University Librarian and Director, Kornelia Tancheva, sent an email to SJP-Pitt officers near the end of the study period, on Thursday afternoon, December 12, regarding the ongoing “study-in.” Ex. 19 (Tancheva 12/12/24 12:21 email). Dr. Tancheva stated that there had been “multiple warnings and requests by Library staff and others to comply with University policy....” *Id.* At this point, she referenced a new rule or guideline that SJP-Pitt was allegedly violating, the Library Space Use Policy. *See* Ex. 20. That policy simply says the library is “reserved for academic-related purposes only. Activities not directly related to academics and library services, programs, and expertise are not allowed. These include, but are not limited to various tabling, signage, or posters [sic] requests that do not meet the above criteria.” *Id.*

80. Since Pitt is a state actor, all University policies, including the library policy, must be applied consistent with the U.S. Constitution, and specifically the First Amendment. Students have a right to express their political views in schools, so long as they do not cause a substantial and material disruption. As with *Tinker*’s black armband, worn in school to protest the Vietnam war, SJP-Pitt students’ silent expressions of support for Palestine were not disruptive and, thus, constitutionally protected.

81. Even if the University could bar all symbolic, silent, non-disruptive study groups with signage or posters from the public library areas, it must do so in a content and viewpoint neutral manner. The University cannot allow the sorority to maintain a group study session with signage and posters, but bar SJP-Pitt from doing likewise.

82. During the four days of study, the only disruption in the Hillman Library was caused by Pitt staff, especially Asher, and the unusual presence of armed Pitt Police officers.

H. Pitt Moves to Suspend SJP-Pitt's Organizational Privileges

83. On January 16, 2025, Pitt's Director of Student Conduct, Defendant Matthew Landy, notified SJP that Pitt had initiated "Level II" disciplinary proceedings against them. Ex. 21. Level II is the most serious infraction level, involving an "alleged Violation of the *Code* where a Respondent may receive a Sanction up to and including Disciplinary Dismissal." See Ex. 17, at 21. Defendant Vincent-Bryan initiated the disciplinary charges against SJP.

84. The notice vaguely described the offending conduct as, "[w]e have reason to believe that your Registered Student Organization may have been involved in an incident or series of incidents that occurred beginning December 9, 2024." Ex. 21. The notice did not cite any rule (in the Student Code of Conduct or otherwise), guideline, or policy that SJP-Pitt allegedly violated. Nor did the notice describe the allegedly offending conduct.

85. On January 22, Landy conducted a remote preliminary "Disciplinary Conference" with SJP-Pitt's co-presidents. During the meeting, Landy "shared" from his computer, i.e., displayed on the screen for the co-presidents to view, pages from a document that seemed to describe the incident spawning the charges, the rules SJP-Pitt allegedly violated, and the proposed discipline. Landy refused to send the students the document he was sharing on his screen, and also told them they could not take screen shots of what he posted.

86. Landy also told the co-presidents that they would need to submit all questions they planned to ask at the hearing in advance. The students, knowing this was not standard procedure used at previous hearings, questioned Landy, who could not identify any rule justifying that requirement and claimed that the Code only outlined procedures in “broad strokes.” Landy admitted this procedure departed from past practice.

87. On January 23, Landy sent the SJP-Pitt students an email that identified two rules SJP-Pitt allegedly violated:

19. Violates or assists in the Violation of any policy, procedure or guideline of the University including, but not limited to the following:

k. Any other policy, procedure, or guideline of the University whether or not listed in the Code; and

36. Fails without just cause to comply with the lawful direction of a University official, or other lawful authority having just cause and acting in the performance of their duties and authority.

Ex. 22 (Landy 01/23/25 16:27 email).

88. Landy never shared Pitt’s description of the allegedly offending SJP-Pitt conduct, which the students requested multiple times before the hearing. Pitt eventually relented, allowing Defendant Mentzer to display the write up on his screen, who told SJP-Pitt leaders they could not take a screen shot but could only write down what they were seeing.

89. The alleged rule violations are so vague and broad that they could encompass any conduct, including constitutionally protected activity. They also fail to give adequate notice of the alleged misconduct, making presentation of a defense difficult, if not impossible. Landy did not identify the “policy, procedure or guideline” in Rule 19.k. that SJP-Pitt allegedly violated, or the “lawful direction of a University authority” at issue in the alleged Rule 36 violation.

90. The students advised Landy that SJP-Pitt would not waive the hearing, admit the “general nature of the charge,” or accept the sanctions. Rather, SJP-Pitt denied the charges and requested a full hearing, which was scheduled for February 4.

91. On January 28, SJP-Pitt submitted their witness list, identifying three Pitt faculty.

92. Pitt did not share with SJP-Pitt a “hearing binder” containing the University’s evidence against SJP-Pitt until 55 minutes before the February 4 hearing. SJP’s co-presidents could neither download nor print the documents in the “hearing binder.”

93. Shortly before the hearing, Pitt notified SJP-Pitt that Pitt’s “confidentiality requirements” applied to the virtual hearing, so SJP-Pitt was forbidden to discuss, copy, or share any materials presented at the hearing; record the hearing; or share the Zoom invitation with anyone else. Ex. 23 (Player 01/31/25 13:28 email). The email also directed that any notes taken during the hearing must be destroyed at the conclusion. *Id.*

I. Pitt’s February 4 Disciplinary Hearing Against SJP-Pitt

94. SJP-Pitt’s disciplinary hearing occurred remotely on February 4, 2025, before a three-member hearing panel.

95. No allegation was raised during the hearing that SJP-Pitt caused a disruption in the library or in any way interfered with any students’ ability to study or staff members’ ability to work.

96. The hearing focused only on whether the students had engaged in an illegal “event” in a “non-reservable space.”

97. A Pitt faculty librarian whose office was in the library testified that during the times he was present, including the critical Monday morning hours of December 9 and again on Wednesday, December 11, the only disruption was caused by Defendant Asher and the unusual

armed-police presence. The students wore keffiyehs and flags, displayed signs, and had political information on the whiteboards, but they were not disrupting other students or staff.

98. He also testified to regularly observing similar study groups that displayed a whiteboard proclaiming the group's name and other messages, often by University Greek organizations. He did not observe the students with SJP-Pitt violate any Pitt rules or policies that he was aware of.

99. Also testifying for SJP-Pitt was Professor Ruth Mostern. She was familiar with SJP-Pitt because she was the faculty advisor for Jewish Students' Bund, a registered student organization aligned with SJP-Pitt's politics on Palestine.

100. Prof. Mostern testified that she was present during much of the confrontation with Asher on Monday morning, December 9. Mostern's testimony was similar to that of the first witness, namely, that the students were not causing any disruption and that the study group looked and behaved like many other study groups she had observed over the years, except that they displayed political messages and symbols. Mostern also testified that some messages on the whiteboards were similar to the information she teaches in class.

101. Prof. Mostern also testified that the students complied with every demand made by Defendants Asher and Vincent-Bryan, except initially to vacate the library. The students repositioned the whiteboards. They removed flags and papers with political messages from the tables and ensured that they were affixed only to their laptops, displayed on personal possessions such as book bags, or worn as clothing. She also testified that she did not observe the students engage in any sanctionable conduct that violated any University rule or policy known to her.

102. Prof. Mostern testified that when she checked in on the students the following three days, they were studious and non-disruptive. There were fewer students and no whiteboards, but

the students continued to wear keffiyehs and flags, and display political messages on small signs taped to laptops. They were studying for finals. The scene looked like many other library study groups she has observed over the years, except that more political messages were visible.

103. The University did not produce any witnesses to counter SJP-Pitt's presentation.

104. To date, the charges remain outstanding and unresolved: Pitt has never issued a decision. Upon information and belief, hearing panels usually issue decisions within a month.

105. No Pitt official advised the students that they should not have any contact with members of the hearing panel.

J. The "Open Letter" Condemning Pitt's Suppression of Pro-Palestinian Voices

106. On Tuesday night, February 4, 2025, following the disciplinary hearing, SJP-Pitt sent an email to about 20 Pitt administrators and University departments with the subject, "Open Letter Condemning the University of Pittsburgh's Suppression of Pro-Palestinian Voices." Ex. 24 (SJP-Pitt 02/04/25 21:52 email). The email's recipients were selected because they might impact Pitt's ongoing retaliation against SJP-Pitt. Recipients included the three administrators who served on that afternoon's hearing panel.

107. SJP-Pitt had solicited signatures from 27 other Pitt-related organizations and 46 community groups supportive of SJP-Pitt, all of whom signed onto the letter.¹¹

108. The Open Letter, on behalf of the organizations, "condem[ed] the selective repression of Students for Justice in Palestine (SJP) at the University of Pittsburgh. As the only Palestinian cultural and advocacy organization on campus—led by Palestinian, Arab, and Muslim students—SJP is being unfairly targeted with heightened scrutiny and politically driven

¹¹ SJP discovered that one group, University of Pittsburgh School of Law, had not actually authorized participation. A faculty member had submitted paperwork signing on to the letter, mistakenly appearing to be signing on behalf of the Law School when they intended to join individually. SJP subsequently removed the Law School as a signatory on the publicly facing copies of the letter posted on their social media.

disciplinary action.” *Id.* The letter contrasted Pitt’s “political suppression” of SJP-Pitt with that of “pro-Israel advocacy organizations,” including SSI’s collaboration with Betar USA, *see* ¶¶ 23 - 27, *supra*, which had issued the “beeper” threats against SJP-Pitt. The signatories’ demands were that Pitt dismiss the disciplinary charges against SJP-Pitt, apply university conduct policies more transparently and equitably, and end suppression of pro-Palestinian advocacy on campus.

109. The letter contained no threatening, coercive or intimidating language, but merely stated the signatories’ position opposing Pitt’s disciplinary, and other repressive, actions against SJP-Pitt. The letter was not sent to the hearing officers *ex parte* or covertly.

110. The letter did not provoke material and substantial disruption on campus.

111. Pitt did not respond to the letter. At least not for 43 days.

K. Pitt Suspends SJP-Pitt in Retaliation for the Open Letter

112. As of March 18, Pitt’s hearing panel still had not issued a decision, despite the passage of six weeks.

113. On March 18, however, Defendant Marlin Nabors, the Associate Vice Provost and Dean of Students, notified SJP-Pitt officers that the University was placing the organization on “interim suspension.” Ex. 25 (Nabors 03/18/25 09:16 email). The email alleged that SJP-Pitt had “improperly engaged in communications to members of the Conduct Hearing Board during their deliberations following the February 4, 2025 Level II Conduct Hearing.” *Id.* The letter did not identify the conduct at issue, but the only possible SJP advocacy was the open letter, and Pitt’s lawyers subsequently acknowledged that the February 4 letter was the focus.

114. Nabors’ letter noted that SJP’s alleged misconduct gave “rise to a number of significant consequences” for SJP-Pitt. *Id.* First, there was the potential for additional misconduct charges. Second, the group would be placed on interim suspension. And third, Nabors alleged

that their actions had “irreparably compromise[d] the integrity and credibility of the current conduct proceeding,” requiring the University to start the process anew. *Id.*

115. Later that day, Pitt Associate Director of Student Conduct, Defendant Jamey Mentzer, sent a letter formally notifying SJP-Pitt that the University had placed it on “Interim Suspension of Registration from the University of Pittsburgh, effective immediately.” Ex. 26. The letter stated that Pitt had “received information that individuals acting on behalf of Students for Justice in Palestine at Pitt [] engaged in conduct that may have violated the Student Code of Conduct.” *Id.* The letter continued: “Specifically, that among other things, you improperly engaged in communications to members of the Conduct Hearing Board during their deliberations following your February 4, 2025, Level II Conduct Hearing. As set forth in the Code, interference with the conduct process, which includes any action designed or with the potential to influence or intimidate any person who is participating in a student conduct proceeding, constitutes a serious violation.” *Id.*

116. Under Pitt’s broad reading of its Code of Conduct, any SJP-Pitt criticism of the proceeding could be construed as possibly influencing the proceedings. This would encompass not only the open letter, but other constitutionally protected acts such as SJP-Pitt criticizing the proceedings in a news interview, published op-ed, off-campus demonstration, or social media post.

117. Consequences of the interim suspension were harsh: “A cessation of organizational operations or use of university resources to advance the mission of the organization. This includes but is not limited to, requesting event space, requesting funds, facilitating any events or hosting anything that [sic] be construed as an event, including co-sponsorship.” *Id.*

118. Suspension of registration deprives SJP-Pitt of various benefits, including funding, access to University space, and other school supports. *See* Ex. 1. The interim suspension is also

indefinite, and can extend until the University determines whether to sanction the organization through its disciplinary process.

119. Suspension of SJP-Pitt's status as a registered student organization does not, and legally cannot, restrict all of SJP-Pitt's free-speech rights, most of which exist independent of the benefits conferred by University registration.

L. Pitt Threatens SJP-Pitt For Off-Campus Free-Speech Activities

120. On March 19, the day after Pitt suspended SJP-Pitt, Defendant Mentzer sent another letter, this time threatening SJP-Pitt with "additional charges" because SJP-Pitt had allegedly failed to heed the March 18 letter, which had "instructed [SJP-Pitt] to cease operations including co-sponsorships." Ex. 27. The March 19 letter described the offending conduct as follows: "We have been made aware that after the interim suspension of registration was already in place, SJP-Pitt actively posted, advertised and promoted specific gatherings or protests on their social media." *Id.*

121. In the only possible social media post at issue, SJP-Pitt had shared on Instagram a non-Pitt group's post about an "emergency protest," to be held on Saturday, March 22, in an off-campus space, Schenley Plaza. *See* Ex. 28. The activity of posting on social media generally, and specifically providing information about an off-campus protest organized by community groups, has nothing to do with University recognition of the club. The post constitutes off-campus political speech that enjoys maximal First Amendment protection. *See, e.g., Mahanoy Area Sch. Dist. v. B.L.*, 594 U.S. 180, 189-190 (2021) (schools "will have a heavy burden" to justify censoring students' "political or religious speech that occurs outside school . . ."); *McCauley v. Univ. of the Virgin Islands*, 618 F.3d 232, 247 (3d Cir. 2010) ("Public universities have significantly less leeway in regulating student speech than public elementary or high schools.").

122. Pitt may be able to deny SJP-Pitt registered organizational status, but it cannot forbid either the organization or its members to exercise their First Amendment right to free

expression. Non-registered organizations, the status SJP-Pitt found itself in after the suspension, have the same free-speech rights as any other group or individuals in the community.

M. SJP-Pitt’s Lawyers Send Letter to Pitt

123. On March 21, 2025, SJP-Pitt’s lawyers sent a letter to Pitt Chancellor, Defendant Joan Gabel, requesting that the University “immediately rescind both its March 18 decision to suspend SJP[-Pitt]’s student group registration and its March 19 threat of additional disciplinary sanctions for continuing to engage in constitutionally protected political speech unrelated to formal organizational recognition.” Ex. 29. Pitt, through its lawyers, responded timely, but the dispute remains unresolved. Gabel has the authority to terminate SJP-Pitt’s suspension and halt Pitt’s harassment of the group.

N. Pitt Resurrects Disciplinary Proceedings Against SJP-Pitt

124. On April 8, 2025, Defendant Mentzer sent SJP-Pitt’s co-presidents a fourth letter, this time to re-initiate Level II conduct proceedings. Ex. 30. In that communication, Mentzer provided a list of alleged violations of the Student Code of Conduct corresponding to Pitt’s three prior letters.

125. Allegations “relating to conduct and events at the Hillman Library in December 2024” involve the following provisions:

19. Violates or assists in the Violation of any policy, procedure or guideline of the University including, but not limited to the following: k. Any other policy, procedure, or guideline of the University whether or not listed in the Code

36. Fails without just cause to comply with the lawful direction of a University official, or other lawful authority having just cause and acting in the performance of their duties and authority.

Id.

126. Allegations “relating to actions taken during the board hearing process” involve the following provisions:

35. Falsifies information or records submitted to a University official or office.

42. Intimidates, coerces, influences, or attempts to do the same against a person who is participating or has participated in any University process or proceeding.

43. Disrupts or interferes with the conduct process.

Id.

127. Allegations “relating to actions taken in violation of the March 18, 2025 interim suspension” involve the following provision:

36. Fails without just cause to comply with the lawful direction of a University official, or other lawful authority having just cause and acting in the performance of their duties and authority.

Id.

128. Mentzer’s April 8 letter did not provide any further information about SJP-Pitt’s “conduct and events” or “actions taken” that allegedly supported Pitt’s charges. It just notified SJP-Pitt’s co-presidents that a “Disciplinary Conference” was scheduled for Friday, April 11, 2025.

129. The University did not present any evidence to support its new accusations or justify the continued use of the disciplinary process against SJP-Pitt.

130. On April 14, 2025, Defendant Mentzer sent SJP-Pitt’s co-presidents a notice of the options for resolution, which included a recommended sanction of, “Termination of Registration with the ability to reapply for reinstatement after two (2) years.” Ex. 31.

O. SJP-Pitt Has Suffered and Continues to Suffer Ongoing Irreparable Harms

131. SJP-Pitt has suffered, and continues to suffer, ongoing irreparable harm for which there is no adequate remedy at law.

132. Defendants disrupted three on-campus demonstrations involving SJP-Pitt in September and October, 2024, without just cause and based on the “event in a non-reservable space” pretext, ordering the events off campus. The off-campus sites were less visible and accessible to Pitt students and staff, the intended targets of SJP-Pitt’s messaging.

133. In December 2024, Asher had no cause to order students, some of whom were associated with SJP-Pitt, to leave the library for a silent, non-disruptive display of political messages. While the students returned a few hours later, they were prevented from communicating their message during that interruption.

134. The disciplinary charges, filed on January 16, have had, and continue to have, a chilling effect on SJP-Pitt's right to free expression. During the spring 2025 semester, SJP-Pitt has hosted only a few general body meetings and the Anti-Zionist Shabbat—which was impeded by Pitt's evasive and restrictive administrative response. *See* ¶¶ 43-50, *supra*. In contrast, SJP-Pitt organized or co-sponsored at least twenty-one on-campus events in the preceding year.

135. Event planning and preparation regularly take months. The initiation of disciplinary proceedings, near the start of the spring semester, and the panel's failure to render a timely decision, for nearly two months after the hearing, have effectively prevented and discouraged SJP-Pitt from planning any events for the past two-plus months; why do the work and go to the trouble if Pitt might suspend SJP-Pitt before the event occurs.

136. Mentzer's March 18, 2025, suspension of SJP-Pitt's registered organization status, in retaliation for its February 4 open letter on behalf of 73 groups, has deprived SJP-Pitt of financial support, access to indoor and outdoor University spaces for educational programming like lectures and teach-ins, ability to use campus mail and bulletin boards available to registered organizations, and opportunities to spread their message by co-sponsoring on-campus events, including jointly with other University organizations.

137. SJP-Pitt was scheduled to co-host with another student organization an art demonstration outside the William Pitt Union on April 3 and 4, but the loss of registration precluded them from conducting the program. The co-sponsor of that demonstration, an allied

student group, also withdrew for fear that the University might retaliate against it, resulting in the event's last-minute cancellation.

138. The SJP-Pitt registration suspension is ongoing and indefinite.

139. SJP-Pitt would normally be gearing up now to plan a full slate of events, teach-ins or demonstrations for the fall 2025 semester. It is precluded from doing so by the suspension. Unless, the suspension is lifted quickly, SJP-Pitt will not be able to engage in the planning and work necessary to put on educational and political events on campus early in the fall 2025 semester.

140. After receiving Mentzer's March 19 letter, SJP-Pitt did not post on what is typically an active social media account. SJP-Pitt resumed posting only after it secured counsel, who warned the University that the directive was unconstitutional. But SJP-Pitt has remained cautious, and posted less frequently, for fear of further retaliation from Pitt.

IV. CLAIMS

A. Count I – (Library Study-In) – Violation of the First Amendment to the U.S Constitution – Against All Defendants

141. Plaintiff incorporates by reference the allegations of the preceding paragraphs as though set forth at length herein, and in the following claims paragraphs.

142. The initiation and prosecution of disciplinary charges against SJP-Pitt for a non-disruptive, silent, symbolic group study session violates the First and Fourteenth Amendments in that a) it violates the holding and reasoning of *Tinker v. Des Moines School Board* and *Brown v. Louisiana, supra*, which established that such non-disruptive speech in school classrooms or public libraries is constitutionally protected; b) it bars expressive conduct based on undefined, unwritten and standardless prohibitions on speech that allow school administrators discretion to pick and choose which speech they will allow; and c) it constitutes content and viewpoint based

discrimination because Pitt allows Greek organizations and others to conduct collective studying with posters and signs, but not SJP-Pitt.

Count II – (Organization Suspension in Retaliation for Open Letter) - Violation of the First Amendment to the U.S Constitution – Against All Defendants

143. The temporary but indefinite suspension imposed on SJP-Pitt by Defendants violates the First and Fourteenth Amendments in that a) it punishes SJP-Pitt for constitutionally protected political speech criticizing Pitt’s treatment of the organization, including its initiation of meritless disciplinary charges, without sufficient cause; b) it retaliates against SJP-Pitt for its criticism of the university; and c) it is based on an overbroad and vague rule that could proscribe any criticism of the hearing process and disciplinary charges.

Count III – (Interference with Demonstrations and Events) - Violation of the First Amendment to the U.S Constitution – Against All Defendants

144. Defendants’ continuing pattern and practice of hindering, obstructing, harassing and suppressing SJP-Pitt sponsored or promoted demonstrations or educational programs on campus, such as the Anti-Zionist Shabbat, violates the First Amendment in that a) it proscribes speech in public forums in a manner that is not narrowly tailored and is without substantial government justification; b) it is viewpoint- and content-based because Pitt has allowed other groups to demonstrate in the area without adverse consequences; and c) it is based on vague and standardless rules.

Count IV – (Threatened Retaliation for Off-Campus Speech) - Violation of the First Amendment to the U.S Constitution – Against All Defendants

145. Defendants’ prohibition of SJP-Pitt’s promotion of off-campus events after it was suspended violates the First and Fourteenth Amendments because SJP-Pitt has a right to engage in political advocacy, on campus and even more so off-campus, regardless of its University-registration status.

V. PRAYER FOR RELIEF

WHEREFORE, in light of the foregoing, Plaintiff respectfully requests the following:

- (a) An order declaring that Defendants have violated SJP-Pitt's rights under the First Amendment to the United States Constitution to free expression, to wit,
 - i. By initiating the disciplinary process, and subsequently filing baseless disciplinary charges, against SJP-Pitt for engaging in non-disruptive silent political expression, namely, the December 2024 Hillman Library study-in;
 - ii. By suspending SJP-Pitt in retaliation for engaging in constitutionally protected criticism of the University, namely, sending the Open Letter to Pitt officials criticizing their treatment of pro-Palestinian activists and the initiation of meritless disciplinary charges;
 - iii. By interfering with SJP-Pitt's lawful on-campus demonstrations and educational/cultural events, including in outdoor public spaces; and
 - iv. By threatening SJP-Pitt with additional disciplinary charges for engaging in protected off-campus expressive activities that are unrelated to the group's status as a registered student organization.
- (b) An order preliminarily, and thereafter permanently, enjoining Defendants and their officers, agents, affiliates, subsidiaries, servants, employees, successors, and all other persons or entities in active concert or privity or participation with them, from
 - i. Continuing with the disciplinary proceedings against SJP-Pitt's that are based on its constitutionally protected expressive activities during the December 2024 Hillman Library study-in (charges resurrected by Pitt on April 8, 2025), for the February 4 open letter, and for promoting off-campus demonstrations, as

- identified in Mentzer's March 19 letter;
- ii. Maintaining SJP-Pitt's interim suspension;
 - iii. Continuing to apply a vague, standardless and content-based permitting system to disrupt and interfere with peaceful campus demonstrations in public outdoor spaces, and educational and cultural events; and
 - iv. Maintaining any threats of disciplinary action against SJP-Pitt for engaging in off-campus expressive activities.
- (c) Entry of judgment for Plaintiff against Defendants for compensatory and/or nominal damages for the violation of Plaintiff's rights under the U.S. Constitution in an amount to be determined by the Court;
 - (d) An award from Defendants to Plaintiff of reasonable attorneys' fees and costs incurred in connection with this action, pursuant to 42 U.S.C. § 1988; and
 - (e) Such further and different relief as is just and proper.

Dated: April 15, 2025

Respectfully Submitted,

By: /s/ Witold J. Walczak
Witold J. Walczak
PA Bar No. 62976
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Pittsburgh, PA 15217
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** Pro hac vice application forthcoming*

Counsel for Plaintiff

VERIFICATIONS

We declare under penalty of perjury under the laws of the United States of America that the foregoing paragraphs of the Verified Complaint are, to the best of our knowledge and belief, true and correct.¹²

/s/

President, SJP-Pitt

/s/

President, SJP-Pitt

¹² Because SJP has faced hostility from third-parties, including a thinly veiled death threat from Betar USA, based on its political statements in support of Palestine, see supra ¶¶ 22-27, Plaintiff redacted its co-presidents' names in the public filing of this Complaint. Plaintiff plans to file a motion to file under seal the unredacted copy of this document. Defendants take no position on the motion.

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS
Students for Justice in Palestine at Pitt
(b) County of Residence of First Listed Plaintiff Allegheny
(c) Attorneys (Firm Name, Address, and Telephone Number)
American Civil Liberties Union of Pennsylvania; P.O. Box 23058, Pittsburgh, PA 15222; 412-681-7854

DEFENDANTS University of Pittsburgh; Joan Gabel, Marlin Nabors, Karin Asher, DaVaughn Vincent-Bryan, Matthew Landy, and Jamey Mentzer
County of Residence of First Listed Defendant Allegheny
NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.
Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)
1 U.S. Government Plaintiff
2 U.S. Government Defendant
3 Federal Question (U.S. Government Not a Party)
4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)
PTF DEF
Citizen of This State 1 1
Citizen of Another State 2 2
Citizen or Subject of a Foreign Country 3 3
Incorporated or Principal Place of Business In This State 4 4
Incorporated and Principal Place of Business In Another State 5 5
Foreign Nation 6 6

IV. NATURE OF SUIT (Place an "X" in One Box Only) Click here for: Nature of Suit Code Descriptions.

Table with columns: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES. Includes various legal categories like Insurance, Personal Injury, Labor, etc.

V. ORIGIN (Place an "X" in One Box Only)
1 Original Proceeding
2 Removed from State Court
3 Remanded from Appellate Court
4 Reinstated or Reopened
5 Transferred from Another District (specify)
6 Multidistrict Litigation - Transfer
8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION
Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
42 U.S.C. § 1983
Brief description of cause:
Unconstitutional interference with and retaliation against a student's organization's expressive activities.

VII. REQUESTED IN COMPLAINT:
CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ Injunction
CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY (See instructions):
JUDGE /s/ Witold J. Walczak
DOCKET NUMBER
April 15, 2025
DATE SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY
RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority for Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. The JS 44, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I. (a) Plaintiffs/Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.) **ERIE CALENDAR** – If cause of action arose in the counties of *Crawford, Elk, Erie, Forest, McKean, Venango or Warren, OR any plaintiff or defendant resides in one of said counties.* **JOHNSTOWN CALENDAR** – If cause of action arose in the counties of *Bedford, Blair, Cambria, Clearfield or Somerset OR any plaintiff or defendant resides in one of said counties.*
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below. **(1) UNITED STATES GOVERNMENT PLAINTIFF** - Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here. **(2) UNITED STATES GOVERNMENT DEFENDANT** - When the plaintiff is suing the United States, its officers, or agencies, place an "X" in this box. **(3) FEDERAL QUESTION** - This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked. **(4) DIVERSITY (OF CITIZENSHIP)** - This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes. **(1) ORIGINAL PROCEEDING** - Cases which originate in the United States district courts. **(2) REMOVED FROM STATE COURT** - Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. **(3) REMANDED FROM APPELLATE COURT** - Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date. **(4) REINSTATED OR REOPENED** - Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date. **(5) TRANSFERRED FROM ANOTHER DISTRICT** - For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers. **(6) MULTIDISTRICT LITIGATION – TRANSFER** - Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407. **(8) MULTIDISTRICT LITIGATION – DIRECT FILE** - Check this box when a multidistrict case is filed in the same district as the Master MDL docket. **PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service. Upon commencing a civil action that is eligible to be placed on the Johnstown or Erie docket pursuant to Local Civil Rule 3 and which is a Designated Civil Action, **the following statement must be included in the "Brief description of the cause" in Section VI.** (Cause of Action) of the Civil Cover Sheet (Form JS-44): **"This case seeks to bar or mandate governmental policies or state or federal actions of statewide or nationwide impact, by declaratory judgment and/or any form of injunctive relief."** If the action seeks to **(1)** bar or mandate statewide enforcement of a state law, including a rule, regulation, policy or order of the executive branch or a state agency, whether by declaratory judgment and/or any form of injunctive relief; or **(2)** seeks to bar or mandate nationwide enforcement of a federal law, including a rule, regulation, policy, or order of the executive branch or a federal agency, whether by declaratory judgment and/or any form of injunctive relief this language should be included pursuant to **Administrative Order 2024-09.**
- VII. Requested in Complaint. CLASS ACTION** - Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P. Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction. **JURY DEMAND** - Check the appropriate box to indicate whether a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases. **CIVIL** - Civil cases are deemed related when a case filed relates to property included in another suit or involves the same issues of fact or it grows out of the same transactions as another suit or involves the validity or infringement of a patent involved in another suit **HABEAS CORPUS & CIVIL RIGHTS** - All habeas corpus petitions filed by the same individual shall be deemed related. All pro se Civil Rights actions by the same individual shall be deemed related.

Date and Attorney Signature. Date and sign the civil cover sheet.

Exhibit 1



Student Affairs

Student Organization Resource Center (SORC)

[HOME](#) / [STUDENT ORGANIZATION RESOURCE CENTER](#)

/ [START A NEW STUDENT ORGANIZATION](#)

Registration Guidelines

Purpose	+
Registration Status	+
Requirements for Registration	+
Privileges of Registration	—

1. Eligible to use University facilities, equipment and services according to policies and procedures.
2. Eligible to apply for funding from the respective student government under the policies and procedures set forth in the appropriate student government constitution and bylaws. Each student government has guidelines that define which student organizations are eligible for funding. The Student Government Board (SGB) requires the organization to be comprised of at least 75% non-CGS undergraduate students. The College of General Studies Student Government (CGSSG) requires the organization to be comprised of at least 60% College of General Studies students. The Graduate and Professional Student Government (GPSG) funds sponsored graduate school

student governments and registered graduate student organizations.

3. Eligible to receive consulting and other services from the SORC and the Office of Student Life.
4. Eligible to collect dues, host fundraising events and solicit funds according to University policy.
5. Eligible to apply for remuneration for officers by student governments.
6. Eligible to receive awards or honors presented to student organizations and members.
7. Eligible to be listed in University publications.
8. Eligible to participate in University activities.
9. Eligible to apply for student organization office space in the William Pitt Union and O'Hara Student Center.
10. Eligible to host program activities consistent with the purpose of the organization.
11. Eligible to distribute literature and organizational materials according to University policies and procedures.
12. Eligible to use the University mail services.
13. Eligible to apply for a University financial account and to use the services of the University business departments initiated through the SORC Business Office.
14. Eligible to request assistance from the Student Affairs Marketing Department to promote organizational activities.
15. Eligible to post material on controlled University bulletin boards.

Additional Requirements and Privileges for Sponsored Status	+
<hr/>	
Assumption of Risk Policy	+
<hr/>	
Hazing Policy	+
<hr/>	
Publications Code	+
<hr/>	

Student Organizations

Find an Organization

Start an Organization

– Registration Guidelines

– Constitution Requirements

Re-Register a Organization

Graduate Student Organizations

Resources for Advisors

Events

Support Services

Guidelines, Forms, and Policies

Contracts

Funds

Frequently Asked Questions

Staff



Student Affairs

Student Organization Resource Center (SORC)

[Find an Organization](#)

[Start an Organization](#)

[Re-Register a Organization](#)

[Graduate Student Organizations](#)

[Resources for Advisors](#)

[Events](#)

[Support Services](#)

[Guidelines, Forms, and Policies](#)

[Contracts](#)

[Funds](#)

[Frequently Asked Questions](#)

[Staff](#)

RESOURCES

[Subscribe to our Newsletter](#)

[University Calendar](#)

[Code of Conduct](#)

[Donate](#)

Student Organization Resource Center
833 William Pitt Union

3959 Fifth Avenue
Pittsburgh, PA 15260

412-624-7115
sorc@pitt.edu

[f](#) [X](#)



Exhibit 2

For Immediate Release

September 1, 2024



Students for Justice in Palestine at the University of Pittsburgh unequivocally condemns the act of violence that took place on Friday, August 30 against two Jewish students. We wholly reject all forms of hate, including antisemitism, Islamophobia, anti-Palestinian racism, and white supremacy, and denounce the misappropriation of Palestinian symbols by individuals unaffiliated with the movement for a liberated Palestine. We reaffirm that the University of Pittsburgh campus should be an inclusive and safe space for students of all backgrounds.

Our thoughts are with the students harmed by this attack, and we wish them a safe and speedy recovery.



sjp_pgh and 5 others



sjp_pgh SJP statement regarding the events of August 30, 2024.

32w



When you guys keep calling for an intifada and and no two state solutions you are calling for more violence and for people to enact in violence. Intifada is violence against Jewish people and that is what we are seeing

32w 1 like Reply

View replies (1)



1,271 likes

September 1, 2024

Log in to like or comment.

Exhibit 3




betar.us 2h
From Create Mode >



Betar is recruiting
tomorrow in Pittsburgh
pls join us on campus
tomorrow if you are a
student or not on campus
midday.



@sjp_pitt our
director
@the_urbanwarrior looks
forward to giving you a
beeper 

@pittapartheiddinvest

📍 University of Pittsburgh

@ssi_pitt



betar.us and 3 others

University of Pittsburgh



SIGN THE PETITION BELOW

BETAR

BAN SJP FROM PITT CAMPUS

Students for Justice in Palestine (SJP) is a U.S.-based organization that consistently glorifies and aligns itself with the ideologies of Hamas and Hezbollah, both designated as terrorist groups. Their activism often serves as a mask for extremism, spreading dangerous anti-Israel and antisemitic propaganda, targeting Jews, and undermining American values. It is deeply troubling that they are recognized as a student organization at @pittofficial.

SJP has a history of promoting violence through calls for intifada, a term explicitly tied to violent uprisings against Jews and the state of Israel. Their rhetoric has incited hostility on campuses nationwide, including at PITT, where Jewish students now face a climate of intimidation and threats, especially if they openly support Israel. This environment of hate and aggression is unacceptable. We demand that SJP be banned from the University of Pittsburgh campus to protect the safety and rights of Jewish students. There have been 3 assaults on Jewish students already this semester. Are we waiting for more or deaths before taking action?

WE DEMAND U PITT BAN SJP NOW.

P.S.: @joshshapiro, where are you?
Your silence is deafening.



285 likes

betar.us University of Pittsburgh has had three anti semetic attacks this month. Jews are being hunted and @sjp_pitt is a pro terrorist organization. They must be stopped. Sign and and share this petition today! https://

3:15

LTE 30%



BETAR.US
Posts

Follow



8 2



betar.us Bear Jews will be handing out 🇺🇸🇺🇸🇺🇸 on campus and off @upitt please join us Jews and non Jews those who stand against jihad stand with Betar. We are on an information tour @pitt gathering names for our recommendations on whom to deport. 🇺🇸🇺🇸🇺🇸 and since non Jews visit campus freely so will Jews. Do strong Jews concern you?!!! We aren't Jews with trembling knees

View all comments



Betar US @Betar_USA · Nov 7

We are on campus and off today hanging out 🇺🇸 and seeing if we need a local chapter! 🇺🇸🇮🇱🕍 !! bear Jews rise up. We will be gathering names for a possible list of people who need to be deported! @UPittPress



↻ 1



♥ 4

📊 150



Exhibit 4

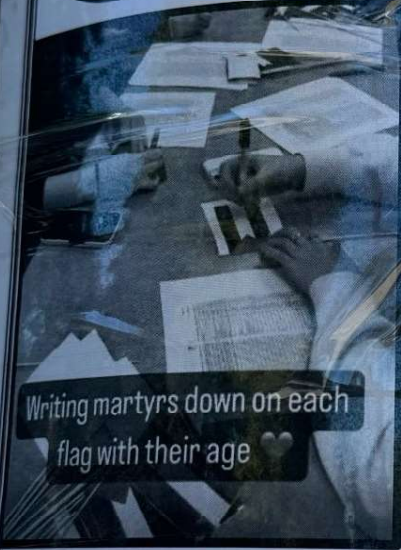
SJP

 **SUPPORTS**  **TERRORISM**

YOUR "MARTYRS" ARE HAMAS TERRORISTS.

132 HOSTAGES.
193 DAYS.
BRING THEM HOME NOW.
עם ישראל חי

PITT STANDS WITH ISRAEL


Writing martyrs down on each flag with their age

 **FAMILY BRAIN INJURY SUPPORT CENTER**

Role of Inflammation

Exhibit 5

SINWAR IS

DEAD YOU MF!

ISRAELI WILL

ALWAYS BE.

FUCK YOU!


Jew hating BITCH

Exhibit 6

Filter results

Search:

Drag a column header here to group by that column

Organization	City	State	Organization Type	University Account Number
 Students for Justice in Palestine			Student Organization (undergrad)	

Open
Select
Email

Alerts

Comment Type (1)	Applies To	Notes:
Internal Communication	Students for Justice in Palestine	do not make late requests for this group without consulting a pro staff. Event description is VERY important with this group due to ongoing protests and demonstrations

Close

1 Records

Close

Cancel Organization Info < Previous

Exhibit 7



Important information regarding tomorrow's event

From Karin Asher <karin.asher@pitt.edu>

Date Tue 9/24/2024 17:56

To [REDACTED]

Cc [REDACTED]

Dear [REDACTED],

I hope this message finds you well. As leaders of Students for Justice in Palestine at Pitt (SJP), I am reaching out regarding the upcoming event that was shared on Instagram by your organization, Urgent Protest: Hands Off Gaza and Lebanon, scheduled for tomorrow, September 25 at 5:30 pm, at the Cathedral of Learning. To my knowledge, there is not a reservation for any University space for this event. Also, for your awareness, the lawn space directly in front of the Cathedral of Learning is non-reservable space. Reservations for reservable sections of the Cathedral lawn may be made by student organizations contacting the William Pitt Union reservations office.

While you may not be the event organizers, as a registered student organization, it is your obligation to uphold University policies and guidelines when you engage with events. I want to draw your attention to several relevant guidelines and policies, listed below. In addition to the Universities policies relating to demonstrations and/or protests on campus, students engaged in such activities on campus must follow the [Student Code of Conduct](#). If individuals attend this event held in a non-reservable space, they may be asked to leave.

- [On Campus Demonstration and Protest Guidelines](#)
- [Event Planning Guidelines for Student Organizations](#)
- Please visit FreeSpeech.pitt.edu for more information

Part of my work in the Office of the Dean of Students is to ensure that registered student organizations have access to the necessary resources as you plan and execute your events and programs, as well as the guidance to do so within University policies. I encourage you to review these resources thoroughly. If you have any questions, please reach out to me directly, and I am happy to set up a time to meet or talk prior to the event. It's important to me that we support your and other student organizations' ability to host their events and meet their goals within University guidelines and policies.

Best,
Karin

Karin Asher, Ed.D. (she/her/hers)

Assistant Dean of Student Engagement and Professional Development

Division of Student Affairs

karin.asher@pitt.edu

Exhibit 8



Re: Important information re: Students for Justice in Palestine

From Karin Asher <karin.asher@pitt.edu>
Date Wed 10/9/2024 16:33
To [REDACTED]
Cc [REDACTED] Landy, Matthew E
<mal130@pitt.edu>

Dear [REDACTED],

Thank you for your response and for sharing your perspective. As stated in my email to the students, we in Student Affairs remain open to the opportunity to meet with the student leaders for an educational meeting. As with all student organizations on campus, we want to ensure that SJP understands their rights and responsibilities under the First Amendment and applicable campus policies when hosting and participating in events on campus. We also want to facilitate an open dialogue so that student leaders likewise understand their obligations when doing so in accordance with applicable time, place, and manner policies outlined on freespeech.pitt.edu.

I have CC'd [REDACTED], with an open invitation to reach out and set up a time to discuss.

Thank you,
Karin

Karin Asher, Ed.D. (she/her/hers)
Assistant Dean of Student Engagement and Professional Development
Division of Student Affairs
karin.asher@pitt.edu

From: [REDACTED]
Date: Tuesday, October 8, 2024 at 11:54 AM
To: Karin Asher <karin.asher@pitt.edu>
[REDACTED]
Subject: Re: Important information re: Students for Justice in Palestine

Dear Karin,

Thank you for sharing your letter, which I find troubling.

First, your letter insinuates that SJP officers refused to meet with you, when the relevant email exchange I was able to see clearly shows that you gave them a very short notice, with only one available meeting time, and they explained that they had classes and assignments then. They did not refuse to meet.

Second, your letter offers no substantiation at all regarding the accusations you are making. Notably: that SJP "shields its activities and promotion of violation(s) of university policy" under the banner of a different organization, "Pitt Divest from Apartheid." The students have already stated that that was a different organization, and further that the "week of rage," which you claim SJP is organizing, is not their action. Since you are making serious accusations accompanied by threats, the accusations do need to be

reliably substantiated; you must provide evidence. I do not see any such evidence in your letter. You should be aware, if you are not, that there are many forces that want to crush campus activism on this issue, and those forces--I suspect--are the sources of the misleading information you may have about SJP.

As you know, the horrors of the current wars have led to much tension across campuses in the US. The management of such tensions requires open dialogue, protecting free speech and the right to protest, and calm and educated posture on the part of the administration. Threats and intimidation are not what we need.

Finally, I am sure that it is not in Pitt's interest to escalate tensions or act in ways that may result in strong public response from many of us among the faculty who support the students' rights, are already organized on campus and, if needed, would be prepared to take any acts of intimidation on the part of the administration to the faculty senate, the union, and the press.

These are times that require openness to civilized conflict, and a lot of common sense. I am sure your office possesses such qualities.

Regards,

[REDACTED]

From: Karin Asher <karin.asher@pitt.edu>
Sent: Tuesday, October 8, 2024 11:22 AM
To: [REDACTED]
Subject: FW: Important information re: Students for Justice in Palestine

Dear [REDACTED],

I'm writing to share the email below that I sent to [REDACTED] yesterday, co-presidents of SJP at Pitt. If you have any questions, please don't hesitate to reach out.

Thank you,
Karin

Karin Asher, Ed.D. (she/her/hers)
Assistant Dean of Student Engagement and Professional Development
Division of Student Affairs
karin.asher@pitt.edu

From: Karin Asher <karin.asher@pitt.edu>
Date: Monday, October 7, 2024 at 9:48 PM
To: [REDACTED]
Cc: Landy, Matthew E <mail130@pitt.edu>
Subject: Important information re: Students for Justice in Palestine

Dear [REDACTED],

As you are aware, you were invited to meet with me today, Monday October 7, to discuss Students for Justice in Palestine (SJP) activities. It is unfortunate that you declined to meet. It is a missed opportunity to have an educational conversation about your student organization. Since we were not able to have a conversation, I have outlined important information for you to be aware of as Co-Presidents of SJP. You are welcome to contact me if you would like to meet to further dialogue about these issues.

We understand that Students for Justice in Palestine (SJP) and Pitt Divest from Apartheid are working in concert with one another. As such, it is important that you know that SJP cannot shield its activities and promotion of violation(s) of university policy by disclaiming involvement or standing behind other organizations unaffiliated with the University. The “Week of Rage” is one example of SJP continuing to promote and participate in activities not in compliance with Student Affairs policies and procedures. We want to be clear that failure to comply with university guidance and the student code of conduct will result in a conduct referral and potential sanctions up to and including loss of registration and individual student sanctions. SJP’s continued failure to comply with University guidance will not be permitted.

As you know, SJP is currently a registered student organization and has certain rights and obligations under Student Affairs and University policy and procedure. We believe you are familiar with our policies and procedures such as the facility use, temporary signage and other University policies related events on campus; however, I want to refer you to www.freespeech.pitt.edu for your reference, should you need additional information.

In pursuit of a positive campus environment, we are committed to promoting dialogue and engagement across the University, including on complex topics, consistent with the First Amendment. Meeting with Student Affairs will not only support these rights but also support safety for all members of the community. Student Affairs is available to assist SJP in planning events in compliance with University policy, including help reserving appropriate space, and other planning details. We hope you will reach out so we may work together to avoid conduct violations.

Sincerely,
Dr. Asher

Karin Asher, Ed.D. (she/her/hers)
Assistant Dean of Student Engagement and Professional Development
Division of Student Affairs
karin.asher@pitt.edu

Exhibit 9



Free Speech

POLICIES & GUIDELINES

Demonstration and Protest Guidelines

On-Campus Demonstration and Protest Guidelines for Students and Student Organizations

The University of Pittsburgh supports the right of students and student organizations to engage in peaceful, orderly, and nondestructive demonstrations while ensuring the safety and respect of all individuals on campus. A demonstration includes any organized public gathering or activity expressing support for or opposition to an issue, person, group, idea, or policy.

Students or student groups who engage in an on-campus demonstration must refrain from disrupting the educational process and from infringing upon the rights of other members of the University community. Additionally, on-campus demonstrations must be compliant with all applicable federal, state, or local laws and ordinances, as well as with these “On-Campus Demonstration and Protest Guidelines” and all other applicable University guidelines, policies and procedures including the [Student Code of Conduct](#).

The University maintains the right to regulate and monitor the time, place and manner of any on-campus demonstrations as may be necessary to help ensure the safety and well-being of community members and the orderly conduct of classes and other functions of the University.

The University neither permits nor forbids demonstrations in off-campus locations by members of the University community. Persons demonstrating off-campus are reminded that they are expected to

act in a manner that will comply with all federal, state and municipal laws and ordinances.

For any demonstrations on University property, reserved or otherwise, please note:

1. Many campus spaces are available for student organizations and University departments to reserve for planned events, including demonstrations. These include, but are not limited to, student union spaces, academic building rooms, outdoor plazas, and lawn spaces. Reservation procedures vary by building, but student organizations should utilize the [EMS system](#) to begin most reservation processes. If you cannot locate a space you are interested in, please reach out to the [Student Union Operations team](#) for assistance.
2. Demonstrations must not block pedestrian or vehicular traffic to ensure safety and accessibility for all.
3. Demonstrations must not block or otherwise interfere with any person's ability to enter or exit any University property (buildings/patios/plazas/gathering spaces, etc.)
4. No demonstration shall obstruct or disrupt activity related to the University's educational process, including, but not limited to, activity occurring in classrooms, offices, laboratories or other University facilities or grounds, except as may be permitted under the [Event Planning Guidelines](#), which outline appropriate means to demonstrate during a sponsored event.
5. Open flames are generally prohibited on campus, with exceptions made for approved religious or ceremonial events. For more details, please refer to the University's Fire Safety Guidelines on the [Environmental Health and Safety page](#).
6. Sound or voice amplifiers are not permitted inside University buildings. Outdoor use is permitted only if it does not disrupt University activities.
7. Demonstrators must not engage in behaviors that could harm others or threaten physical injury.

8. No demonstration shall cause damage to or the destruction of any property.
9. Demonstrators may distribute literature in designated areas and must follow the [Posting & Chalking Guidelines](#) for Students and Student Organizations.
10. Picketing is allowed on University property outside buildings or events, provided it does not obstruct entryways or access to facilities or events or disrupt University operations.
11. The use of any signs attached to rigid supports or frames is prohibited in any University owned or operated building. Additionally, signs cannot be attached to or propped by or on University furniture or structures, such as chairs, benches, tables, trash cans etc. Refer to [University of Pittsburgh Police CS 28: Posting Temporary Signage Policy](#) for details.
12. The use of tents or other temporary structures is not permitted without advance approval from the Office of Facilities Management. Refer to [University of Pittsburgh Policy AO 47: Management of University Facilities and Grounds](#) for details.
13. Peaceful protest during an event or meeting must not interfere with the audience's view or ability to hear a speaker or participate in an event. Any use of signs, prolonged standing, or other activity likely to block the view of an audience member is not permitted.

For demonstrations on City property, please note:

Contact the [City of Pittsburgh, Office of Film and Event Management](#), to apply for any necessary special event permits for demonstrations on City property.

Enforcement

Please be advised that any violation of these guidelines by a student or student organization may lead to a referral to the student conduct process. The content of all information posted or chalked on University property must comply with the [Student Code of Conduct](#)

and all other applicable University regulations and local, state and federal laws. Nothing in these guidelines should be construed to restrict activity protected under the First Amendment.

Resources

These guidelines provide a framework for on-campus demonstrations. For more information about student rights and responsibilities, please visit this section of [Free Speech at Pitt](#) for educational resources.

Policies & Guidelines

Policy Summaries

Demonstration & Protest Guidelines

Posting & Chalking Guidelines

Event Planning Guidelines

Suggested Opening for Invited Speaker Events

Employee-Specific Information

Handling Classroom Disruptions

Support for events within 21 days

Demonstration Guidelines

These Guidelines outline the University's parameters that must be followed by individuals involved in an on-campus demonstration.

For more information about your rights during a demonstration, please consider the following resource from the American Civil Liberties Union: [ACLU Know Your Rights: Protests & Demonstrations](#).

Student Code of Conduct

The [Student Code of Conduct](#) is a set of expectations by which all Pitt students are required to abide.

[Read the Code of Conduct](#) →



Free Speech

[Rights & Responsibilities](#)

[Policies & Guidelines](#)

[FAQ](#)

[Events](#)

[Support Resources](#)

[Reporting Issues & Asking Questions](#)

RESOURCES

[University Events Calendar](#)

[Pittwire](#)

[Centers & Institutes](#)

[Degree Finder](#)

[Office of the Provost](#)

Student Affairs

4200 Fifth Ave.
Pittsburgh, PA 15260

+1 412-624-4141



Exhibit 10



Re: Global Hub Space Request

From Elliott, Adrien <adrien.elliott@pitt.edu>
Date Thu 1/16/2025 15:55
To [REDACTED]
Cc Delnore, Allyson Jaye <adelnore@pitt.edu>

Hello [REDACTED]!

Allyson has been tied up a lot today, so thank you for your patience.

Allyson can meet you in the UCIS Director's office. We are located on the 4th floor of Posvar. Once exiting the elevators on the 4th floor, turn left and we are almost to the end of the hall on the left. You'll enter 4400 Posvar and when you enter, walk straight ahead (the reception desk will be to your right), and when it opens up to a common gathering space, look to your left. The Director's Office is in the left most corner of that space, 4408, and is marked "Office of the Director" on the door.

Thank you for your time, and be safe traveling home this evening!

--

Adrien Elliott (she/her/hers)
Executive Assistant, Director's Office
University Center for International Studies (UCIS)/PittGlobal
University of Pittsburgh
4400 Posvar Hall



Pitt Global | University Center for
International Studies

From: [REDACTED]
Date: Thursday, January 16, 2025 at 1:13 PM
To: Delnore, Allyson Jaye <adelnore@pitt.edu>, Elliott, Adrien <adrien.elliott@pitt.edu>, Pitt Global Hub <globalhub@pitt.edu>
Cc: [REDACTED]
McSweeney, Molly Christine <MCM206@pitt.edu>, Westley, William <WKW7@pitt.edu>
Subject: Re: Global Hub Space Request

Hi Allyson,
I'm available to meet at 5. Where is your office located?

Best,
[REDACTED]

From: Delnore, Allyson Jaye <adelnore@pitt.edu>

Sent: Thursday, January 16, 2025 10:45

To: [REDACTED] Elliott, Adrien <adrien.elliott@pitt.edu>; Pitt Global Hub <globalhub@pitt.edu>

Cc: [REDACTED] McSweeney, Molly Cristine <MCM206@pitt.edu>; Westley, William <WKW7@pitt.edu>

Subject: Re: Global Hub Space Request

Dear [REDACTED],

I appreciate your diligence and thoroughness. I had been working with a contact in Student Affairs and have reached out to confirm that the reservation is still possible.

But I also understand your time constraints. I can meet today (Thursday) at 5 or can move some things around tomorrow (Friday) to be available at 10 or 2. Are any of those times doable for you?

Allyson

Allyson J. Delnore, Ph.D. (She/her/hers)

Interim Executive Director of UCIS

University Center for International Studies (UCIS)

University of Pittsburgh

Phone/Teams: 412-624-5404

4406 Posvar Hall, Pittsburgh PA, 15260

Web: www.ucis.pitt.edu **Email:** adelnore@pitt.edu



From: [REDACTED]

Sent: Wednesday, January 15, 2025 4:43 PM

To: Delnore, Allyson Jaye <adelnore@pitt.edu>; Elliott, Adrien <adrien.elliott@pitt.edu>; Pitt Global Hub <globalhub@pitt.edu>

Cc: [REDACTED] McSweeney, Molly Cristine <MCM206@pitt.edu>; Westley, William <WKW7@pitt.edu>

Subject: Re: Global Hub Space Request

Good afternoon Allyson!

The Shabbat cannot occur in the William Pitt Union due to two policy violations it would incur; student unions do not allow home-cooked food or potlucks, and they do not permit food purchased from outside vendors without documentation submitted 21 days in advance.

I have cc'ed Will Westley, who I spoke to regarding the potential move. Please let me know of your availability to meet tomorrow and Friday so that the event can proceed as planned in the original space.

[REDACTED]

From: Delnore, Allyson Jaye <adelnore@pitt.edu>
Sent: Wednesday, January 15, 2025 08:50
To: [REDACTED] Elliott, Adrien <adrien.elliott@pitt.edu>; Pitt Global Hub <globalhub@pitt.edu>
Cc: [REDACTED] McSweeney, Molly Cristine <MCM206@pitt.edu>
Subject: Re: Global Hub Space Request

Dear [REDACTED],

Good morning. And good news.

We have been able to transfer the reservation for this event to the Assembly Room in the William Pitt Union. Given potential size of the event, that will be a more appropriate venue. Please let your collaborators know and take the necessary steps to get the word out to potential attendees.

I assume that this resolves the problem, so we likely don't need to meet anymore. But if you do want to touch base, let me and Adrien know.

Best wishes for your event,
Allyson

Allyson J. Delnore, Ph.D. (She/her/hers)

Interim Executive Director of UCIS

University Center for International Studies (UCIS)

University of Pittsburgh

Phone/Teams: 412-624-5404

4406 Posvar Hall, Pittsburgh PA, 15260

Web: www.ucis.pitt.edu Email: adelnore@pitt.edu



From: [REDACTED]
Sent: Tuesday, January 14, 2025 7:24 PM
To: Elliott, Adrien <adrien.elliott@pitt.edu>; Delnore, Allyson Jaye <adelnore@pitt.edu>; Pitt Global Hub <globalhub@pitt.edu>
Cc: [REDACTED] McSweeney, Molly Cristine <MCM206@pitt.edu>
Subject: Re: Global Hub Space Request

Hi Adrien,

Could you check Allyson's availability after 3 pm on Thursday, or any time this Friday outside of the window between 1 and 2 pm? We have already secured hundreds of dollars in funding for this event, and meeting next week would not be ideal given that it is scheduled for the 24th.

Best,

[REDACTED]

From: Elliott, Adrien <adrien.elliott@pitt.edu>
Sent: Tuesday, January 14, 2025 14:10
To: [REDACTED] Delnore, Allyson Jaye <adelnore@pitt.edu>; Pitt Global Hub <globalhub@pitt.edu>
Cc: [REDACTED] McSweeney, Molly Cristine <MCM206@pitt.edu>
Subject: Re: Global Hub Space Request

Hi there again [REDACTED]

Allyson's schedule fills up quickly so it can be difficult to accommodate last minute requests, so this week is pretty full, but she has a window next Tuesday 1/21 from 3-3:45 or Wednesday 1/22 she has flexibility late morning or an opening at 4:00 pm.

Would any of those openings also work for you?

Thanks again!

--

Adrien Elliott (she/her/hers)

Executive Assistant, Director's Office

University Center for International Studies (UCIS)/PittGlobal

University of Pittsburgh

4400 Posvar Hall



From: [REDACTED]
Date: Tuesday, January 14, 2025 at 2:06 PM
To: Elliott, Adrien <adrien.elliott@pitt.edu>, Delnore, Allyson Jaye <adelnore@pitt.edu>, Pitt Global Hub
Cc: [REDACTED] McSweeney, Molly Cristine <MCM206@pitt.edu>
Subject: Re: Global Hub Space Request

Hi Adrien,

Thanks for your message. Does Allyson have any availability today after 4 or Thursday after 3?

Best,

[REDACTED]

|_____

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: Elliott, Adrien <adrien.elliott@pitt.edu>
Sent: Monday, January 13, 2025 17:14
To: Delnore, Allyson Jaye <adelnore@pitt.edu>; [REDACTED]; Pitt Global Hub <globalhub@pitt.edu>
Cc: [REDACTED] McSweeney,

Molly Cristine <MCM206@pitt.edu>

Subject: Re: Global Hub Space Request

Greetings everyone,

I am happy to find a mutually convenient time for everyone to meet. I would like to please start with all days and times that are typically available for you and I'll check Allyson's schedule to see what might work best.

Thank you and I look forward to hearing from you soon.

All the best,

--

Adrien Elliott (she/her/hers)

Executive Assistant, Director's Office

University Center for International Studies (UCIS)/PittGlobal

University of Pittsburgh

4400 Posvar Hall



Pitt Global | University Center for
International Studies

From: Delnore, Allyson Jaye <adelnore@pitt.edu>

Date: :03 PM

To: [REDACTED]

Cc: [REDACTED] McSweeney,

Molly Cristine <MCM206@pitt.edu>, Elliott, Adrien <adrien.elliott@pitt.edu>

Subject: Re: Global Hub Space Request

Dear [REDACTED]

Yes, I think there was a misunderstanding and I take full responsibility for that. I see how what I wrote promoted you to think that I had reversed my initial position, but that was never my intention. I also fully remembered having written that anything cast as Non- or Anti- anything would likely not be in the spirit of the Hub, so if that is the essence of the event, you should find another space that can be controlled and closed off and is not so open to the public. But that is most definitely not in our correspondence. I was not as clear as I really thought I had been. I had assumed that the paragraph you quoted below would be understood within the context of my earlier email, which was part of the same thread, and of the guidelines for the use of the space, which are posted online and have to be read in order to request a reservation in the first place. But I should have been clearer.

As I wrote when this first came up in November, the ethos behind the hub is inclusive and welcoming. The title "Anti-Zionist Shabbat" was not in that spirit, so I asked you to rethink it.

I thought that was clear, though evidently not and that is my fault. When you proposed "non-Zionist" instead, I was urging you to move more to "Student-organized Shabbat" and to be welcoming more broadly. Again, anything that is non- or anti- is not in the spirit of the public nature of the hub. What I had meant was that your sponsorship of the event might lead to a natural self-selection of participants, so I imagined that your announcing the event would frame it. But I see how that was not clear in what I wrote. And having now seen the way that the event is promoted, I realize that this is not really possible and I was being naive.

As it says on the Global Hub website ([Reservations | Global Hub | University of Pittsburgh](#)), "all requested events and programs must be open to the public." The space is open to the full building - there is no way to close it off - thus people cannot choose whether or not to enter an event. So, the caveat on social media: "Is this event open to non-Jewish allies and staff/faculty/community members? All who are respectful of the space's intentions are welcome" is insufficient. One cannot restrict the space to people who share a viewpoint. People pass through from the front door to the elevator. Anyone may easily be unwillingly entering a space they are not respectful of, through no fault of their own. They did not actively choose to be there.

The Global Hub reserves the right to reject or require amendments to any reservation - at any time. Given the unsuitability of the Hub for the spirit of the event that you are clearly committed to, I encourage you to explore other options and announce a change in venue when you have one.

I would be happy to discuss this with you and your colleagues, but cannot do that at 6, as I need to leave by 5:30 due to a prior family commitment. I am copying my colleague, Adrien Elliott, on this message to help coordinate a meeting. She has access to my calendar and can help us find a time that will work.

Sincerely,

Allyson Delnore

Allyson J. Delnore, Ph.D. (She/her/hers)

Interim Executive Director of UCIS

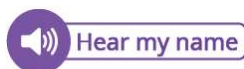
University Center for International Studies (UCIS)

University of Pittsburgh

Phone/Teams: 412-624-5404

4406 Posvar Hall, Pittsburgh PA, 15260

Web: www.ucis.pitt.edu Email: adelnore@pitt.edu



From: [REDACTED]
Sent: Monday, January 13, 2025 3:01 PM
To: Delnore, Allyson Jaye <adelnore@pitt.edu>; Pitt Global Hub <globalhub@pitt.edu>
Cc: [REDACTED] McSweeney,
Molly Cristine <MCM206@pitt.edu>
Subject: Re: Global Hub Space Request

Good afternoon Allyson.

I was surprised to receive your message, as my understanding was that SJP and Jewish Students' Bund were free to pick a framing for the event (based on the language of your email from 2 January):

*"But to keep the focus on your groups' message, any public-facing announcement of the event from UCIS (for instance the post on the Global Hub calendar online) will just give "Student-organized Shabbat" as the title. (The fact that the event organizers are SJP and Jewish Students' Bund will make clear the non-Zionist bent.) Promotion of the event will be largely done through your organizations' social media or other channels; **you are free to frame the event as you wish.**"*

I am not aware of an explicit ask that the event "be reframed and that the language of anti-zionism not be used," but I and representatives from JSB are happy to meet with you to discuss the particulars of the Shabbat's promotion.

I will be at the Global Hub at 6 pm today for [another event I have organised there](#). Should this time not work with your schedule, please let me know of some alternatives later this week.

Best,

[REDACTED]

—

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: Delnore, Allyson Jaye <adelnore@pitt.edu>

Sent: Monday, January 13, 2025 12:53

To: [REDACTED] Pitt Global Hub <qlobalhub@pitt.edu>

Cc: [REDACTED] McSweeney,

Molly Cristine <MCM206@pitt.edu>

Subject: Re: Global Hub Space Request

Dear [REDACTED],

Good morning.

I was just made aware of social media posts advertising the event that we discussed as an "Anti-Zionist Shabbat", which I had explicitly asked you to reframe and not use, as it is against the ethos of the Global Hub, which is an open and public space, and therefore has to be open to any and all members of our community. In the social media posts that I can see, it is open to people who agree with anti-zionism. (The welcoming of anyone who is respectful of the space's intentions is not distinguishing between the Global Hub as a space and the space you are creating as an event.) That is not what I thought we had discussed.

I realize that there may have been some confusion in our exchange. I asked that the event be reframed and that the language of anti-zionism not be used if you were to use the space for a student-organized Shabbat. I thought that was clear - that the openness of the space was the primary consideration - I did not mean for you to revert back to the Anti-Zionist title in your social media posts.

Can we meet and discuss how to move forward, as I am afraid that the Global Hub may not be a space that is appropriate for your event.

Allyson Delnore

Allyson J. Delnore, Ph.D. (She/her/hers)

Interim Executive Director of UCIS

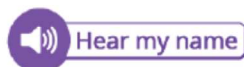
University Center for International Studies (UCIS)

University of Pittsburgh

Phone/Teams: 412-624-5404

4406 Posvar Hall, Pittsburgh PA, 15260

Web: www.ucis.pitt.edu Email: adelnore@pitt.edu



From: Delnore, Allyson Jaye <adelnore@pitt.edu>

Sent: Thursday, January 2, 2025 11:55 AM

To: [REDACTED] Pitt Global Hub <globalhub@pitt.edu>

Cc: [REDACTED] McSweeney,

Molly Cristine <MCM206@pitt.edu>

Subject: Re: Global Hub Space Request

Dear [REDACTED],

Thank you for writing and for continuing to think with us through this planning process.

As you may be aware, there has been increased scrutiny of UCIS-related units and the events that we are sponsoring/hosting in various on-line groups and campus watch-dog groups. My goal is to not distract from your event by making it about UCIS and what PittGlobal is doing, and keep it about your goals and interests.

That said, you are seeking approval for a space following university policy, so the space can be used by your group (as long as Molly confirms it is free) for the purposes you outline below.

But to keep the focus on your groups' message, any public-facing announcement of the event from UCIS (for instance the post on the Global Hub calendar online) will just give "Student-organized Shabbat" as the title. (The fact that the event organizers are SJP and Jewish Students' Bund will make clear the non-Zionist bent.) Promotion of the event will be largely done through your organizations' social media or other channels; you are free to frame the event as you wish. But I did want to give you that heads up, so you are not surprised if you see a more generic title on anything generated by the Hub.

Molly, can you please confirm that the day/time is still available for SJP and JSB's Shabbat event on the 31st?

Best,

Allyson

Allyson J. Delnore, Ph.D. (She/her/hers)

Interim Executive Director of UCIS

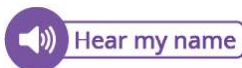
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University of Pittsburgh

Phone/Teams: 412-624-5404

4406 Posvar Hall, Pittsburgh PA, 15260

Web: www.ucis.pitt.edu Email: adelnore@pitt.edu



From: [REDACTED]
Sent: Sunday, December 22, 2024 1:16 AM
To: Pitt Global Hub <globalhub@pitt.edu>; Delnore, Allyson Jaye <adelnore@pitt.edu>
Cc: [REDACTED] McSweeney,
Molly Cristine <MCM206@pitt.edu>
Subject: Re: Global Hub Space Request

Kya Baat Hai has reserved the Conversation Table every Friday from 3:30-5:30 pm for the academic year, so that is also the case on January 24.

All the best,

Molly

Molly McSweeney

 [Image removed by sender. A button with "Hear my name" text for name playback in email signature](#)

Assistant Director for Student and Community Engagement

University Center for International Studies | Global Hub

University of Pittsburgh

4400 Wesley W. Posvar Hall
Pittsburgh, PA 15260

Email: mcm206@pitt.edu | globalhub@pitt.edu

<https://www.globalhub.pitt.edu/>

Phone/Microsoft Teams: (+1) 412-383-2733

Pronouns: she/her/hers ([What's this?](#))

If you are submitting a reservation request or hosting an event in the Pitt Global Hub, please be sure to [check out the FAQ page](#) on the Pitt Global Hub website. Thank you!

Are you an undergraduate student looking to demonstrate your cross-cultural exposure and awareness to potential employers? Learn more here:

<https://www.globalhub.pitt.edu/about/global-distinction>

Fall 2024 Global Distinction Drop-In Hours: Weekly on Tuesdays, 12-1 pm | Global Hub (1st floor, Posvar Hall)

Pitt GlobalHub

From: Delnore, Allyson Jaye <adelnore@pitt.edu>
Sent: Wednesday, November 13, 2024 8:43 AM
To: [REDACTED]
Cc: Pitt Global Hub <globalhub@pitt.edu>; [REDACTED]
[REDACTED] McSweeney, Molly Cristine <MCM206@pitt.edu>
Subject: RE: Global Hub Space Request

Dear [REDACTED],

Thanks for replying so quickly. I appreciate your being open to my request.

I will ask my colleague, Molly McSweeney, to weigh in about Hub availability times.

In the meantime, we'll look forward to what you come up with after consulting with your colleagues from the Bund.

Best,

Allyson

Allyson J. Delnore, Ph.D. (She/her/hers)

Interim Executive Director of UCIS

University Center for International Studies (UCIS)

University of Pittsburgh

Phone/Teams: 412-624-5404

4406 Posvar Hall, Pittsburgh PA, 15260

Web: www.ucis.pitt.edu **Email:** adelnore@pitt.edu



From: [REDACTED]
Sent: Tuesday, November 12, 2024 10:31 PM
To: Delnore, Allyson Jaye <adelnore@pitt.edu>
Cc: Pitt Global Hub <globalhub@pitt.edu>; [REDACTED]
[REDACTED] McSweeney, Molly Cristine <MCM206@pitt.edu>
Subject: Re: Global Hub Space Request

Hi Allyson,

Thank you so much for reaching out regarding our proposed event! We will gladly reframe the booking's title and description to be more explicit about the event's focus on building community and fostering solidarity with the Palestinian people. I will speak with members of the Bund and get back to you with further details later this week! From there, we can schedule a time to discuss in person as necessary.

The microphone won't be needed, so we are happy to remove that from the reservation. I also emailed Molly yesterday about rescheduling the event to January 24th owing to some conflicts with Bund members' schedules. Can you let me know if there will be another group utilising the space on that date as well?

Best,

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

From: Delnore, Allyson Jaye <adelnore@pitt.edu>

Sent: Tuesday, November 12, 2024 19:14

To: [Redacted]

Cc: Pitt Global Hub <globalhub@pitt.edu>; [Redacted]

Subject: Global Hub Space Request

Dear [Redacted]

Good evening. Thank you for submitting a request for use of the Global Hub space for your event on January 31st. My colleague passed along your request to me and I am writing in the hopes of entering into a dialogue with you about the event you are proposing.

The Global Hub is first and foremost a student-centered space, and so we welcome student initiatives and proposals for how best to use the space. In addition, the space is open to the building (in its design) and to the world (in its conception). The ethos behind the hub is inclusive and

welcoming. We encourage discussion and debate in the spirit of building community across difference. In that spirit, I am writing to ask if your groups would be willing to reframe the title and description of the event to emphasize solidarity and community building around support for Palestine (or some other formulation that is more meaningful for you).

I would be happy to meet with you and anyone else from SJP and/or Jewish Student's Bund to discuss your proposal and my reservations. Please let me know if you would like to set up a time to speak about this directly. Otherwise, happy to continue the conversation over email, as well.

Best,

Allyson Delnore

P.S. I should also make you aware of a small scheduling conflict that my colleague signaled to me: another student group has already reserved the Conversation table for an event that will end at 5:30, so will overlap with the time you requested and any time you need for set up. Would it be possible to adjust the timing of your event to start a bit later? Though, the one problem with later is that access to the handheld microphone may be limited unless we can identify a student worker who would be able to staff the event at that time. (Access to the kitchenette is not dependent upon staffing.) Should these small issues not discourage you from wanting to hold your event in the Global Hub, let's find a time to discuss options.

Allyson J. Delnore, Ph.D. (She/her/hers)

Interim Executive Director of UCIS

University Center for International Studies (UCIS)

University of Pittsburgh

Phone/Teams: 412-624-5404

4406 Posvar Hall, Pittsburgh PA, 15260

Web: www.ucis.pitt.edu Email: adelnore@pitt.edu

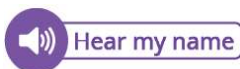


Exhibit 11



Canceled: Student-organized Shabbat

Organizer Pitt Global Hub <globalhub@pitt.edu>
Meeting time This event occurred 2 months ago (Fri 1/24/2025 16:30 - 21:00)
Location Global Hub - Conversation Table; Global Hub - Island; Global Hub - Living Room; Global Hub - Nook A; Global Hub - Nook B
My response Not yet responded
Required attendees Pitt Global Hub, Global Hub - Conversation Table, Global Hub - Island, Global Hub - Living Room, Global Hub - Nook A, Global Hub - Nook B, [REDACTED]
Optional attendees Delnore, Allyson Jaye, McSweeney, Molly Cristine, [REDACTED]
Importance High
Message sent Wed 1/15/2025 09:33

Greetings from the Global Hub,

Given that the venue for this event has changed, we are cancelling the reservation in the Global Hub.

Thank you for your collaboration, and best wishes for the event.

Exhibit 12



15 Years of College Nights at our Haus!
Every Thursday 8-10pm

- NEWS
- OPINIONS
- SPORTS
- CULTURE
- VISUALS
- LETTERS OF THE BLOGS
- SILHOUETTES
- ABOUT
- WRITING CONTEST
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- MORE

- Live Music
- \$7 Pretzels

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April 2 SGB introduces new governing code bill and addresses rumors of ICE on campus

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GRADUATION CENTRAL KICKOFF Regalia Pickup Starts April 8.

THE UNIVERSITY STORE

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I Agree

X

'We demand change': Students protest sexual assault on campus



Pamela Smith | Visual Editor

A Pitt student speaks at a protest against sexual violence outside of the Cathedral of Learning Friday afternoon.

By Alexandra Ross, Senior Staff Writer
October 7, 2022

More than 100 students at a Friday afternoon protest demanded Pitt take action following a series of reported sexual assaults, chanting "take back our safety, take back our campus" and carrying signs with phrases such as "We demand change, we will not be silenced." Some protestors stormed a blocked-off section of the Cathedral of Learning to show the University that they are serious about the issue.

Students organized the protest in response to a Thursday crime alert about an alleged sexual assault on campus, which is the third sexual assault crime alert Pitt Police have released this academic year. According to the crime alert, at approximately 4:20 p.m. Monday, a college-age man sexually assaulted a woman in a Cathedral stairwell then fled in an unknown direction. The crime alert described the suspect as a college-age thin Black male with short curly "buzz cut" hair, stubble facial hair and brown eyes. His estimated height is 5' 8"-5'9".

Carrie Benson, the senior manager for prevention and education at Pitt's Title IX office, said the University police department and Office of Civil Rights and Title IX are actively investigating and responding to the incident.



"The University does not and will not tolerate sexual assault and misconduct on our campuses, and we will continue to prioritize the important work of fostering a learning environment where every member of our university community feels safe, respected and supported," Benson said.

HEART DISEASE CAUSES 1 IN 5 DEATHS
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Forbes Management
Click link above to see our availability

ALL angles
A speaker and discussion series for students
Rethinking World Order: risk, opportunity, transformation?
THURSDAY APR 10
3:30 - 5:30 P.M.
O'Hara Student Center Ballroom

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SGB introduces new governing code bill and addresses rumors of ICE on campus

By Sydney Krasniewski, Staff Writer • 5:45 pm

Opinion | School should be in the summer

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Weathering the storm: Pittsburgh teams have tackled some of the toughest environments

By Camille de Jesus, Senior Staff Writer • April 1, 2025



NEWS OPINIONS SPORTS CULTURE VISUAL X

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BREAKING: About 100 students are gathering outside the Cathedral of Learning to demand Pitt take action following a reported sexual assault inside the Cathedral earlier this week.

Watch on X

2:10 PM · Oct 7, 2022

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A Pitt student who asked to remain anonymous said she started an online petition and planned the protest with other Pitt students on Yik Yak, an anonymous social media platform. The student said she wishes to stay anonymous because other protesters raised concerns about some of the demands — namely, increased police — and she did not wish to be associated with the demands personally.

The petition, which garnered about 6,000 signatures by Friday evening, also asked the University to add security cameras to stairwells, bring back swipe access and increase accountability of perpetrators.

The anonymous student said following the string of reported sexual assaults this year and a drunken individual entering Litchfield Towers, it's necessary that Pitts ups security measures on campus.

"I just feel like it's time that people like, do something about it, because it's not an isolated incident," she said. "There's so many safety concerns."

Photos: Students protest sexual violence on campus

Ted Fritz, vice chancellor for public safety and emergency management, said in

By Emma Hannan, Contributing Editor • April 1, 2025

Jaland Lowe enters transfer portal, becomes fifth Panther to jump ship

By Aidan Kasner and Matthew Scabillononi • April 1, 2025

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a campus-wide email alert. The protest, PTIS patrols and presence at the Cathedral and Community Programs Unit officers have been added to the site in response to the alert.

Not all protesters supported the concept of increased policing on campus, because they said police presence does not make students more safe and may even threaten the safety of Black and brown students. In addition, several speakers claimed Pitt Police did not adequately respond when they reported sexual assault.

There were no organized speakers for the event, but while gathered on the Cathedral lawn, students stepped up to speak spontaneously. Student speeches centered on negative experiences with Pitt Police and the Title IX office after being assaulted, the need to hold perpetrators accountable, the persistence of sexual assault in Greek life, struggles with PTSD after surviving assault and more.

Ryan Walter said a white male sexually assaulted her on campus in October 2021 and Pitt Police did not release a crime alert — but five days later, they issued an alert about a sexual assault allegedly committed by a Black man. Based on her experience, Walter said she believes Pitt Police is not informing students about the extent of sexual violence on campus.

“The fact that there have been three assaults reported by crime reports in the past [month] — there’s more than that that they’re not telling us about,” Walter said.

A Pitt spokesperson did not immediately respond to a request for comment on Walter’s criticisms of the Pitt Police crime alert system.

Fritz said Pitt’s approach to handling sexual assault cases is “victim-guided” and “trauma-informed.”

“More than 80% of our officers are currently trained in crisis intervention, which includes a trauma-informed response,” Fritz said. “And we have a victim-guided process, which empowers those who report a crime to make decisions about how we proceed.”


James Loftus, chief of Pitt Police, said safety is the top priority of the police department.

“The safety and well-being of our students, faculty and staff is of paramount importance to the University and is the number one priority of the Pitt Police Department,” Loftus said. “Our ongoing mission is to maintain a campus environment where everyone feels safe and welcome. The University is actively investigating this incident [on Monday].”

Protesters objected to the University putting on Homecoming 2022 festivities at the Cathedral this weekend, and using the building as a positive symbol in the wake of the alleged assault — for example, passing out T-shirts which riffed off the recent debate over the Cathedral’s nickname, Cathy.

“‘Cathy or the Cathedral?’ It’s a crime scene,” a protester said.

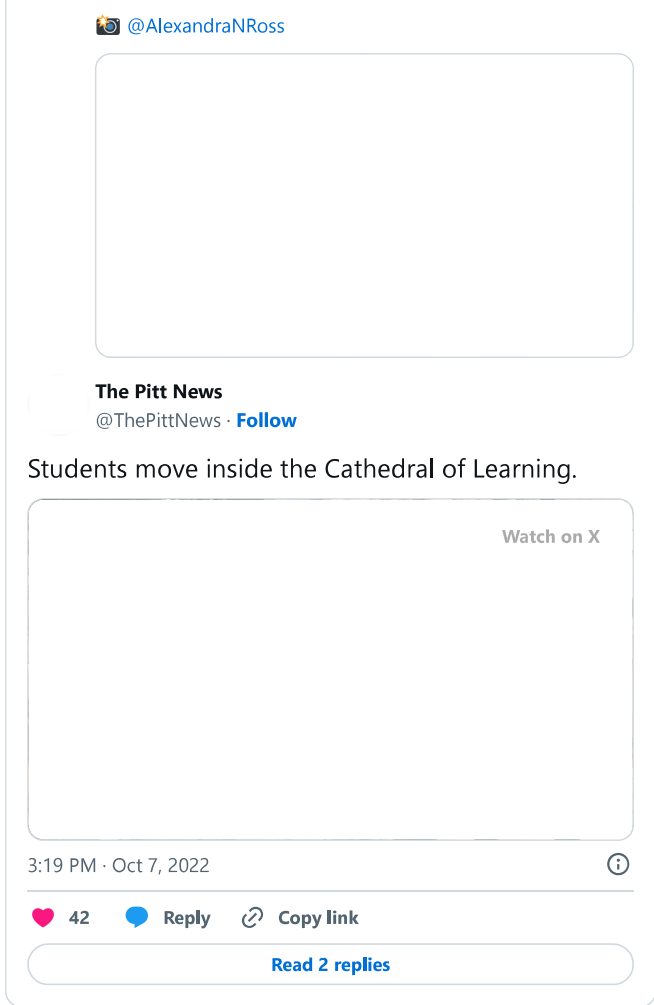
Protesters entered the Cathedral at about 3:15 p.m. Pitt Police officers and representatives of the offices of Student Affairs and Equity, Diversity and Inclusion told the students they needed to disperse from the middle of the Cathedral’s first floor. Pitt had closed off that section of the Cathedral earlier in the day — for the Blue & Gold Bash, one of Pitt’s homecoming events that night — but protesters entered anyway.

The Pitt News · Oct 7, 2022 

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Eventually, police informed protesters that if they did not leave the center of the first floor of the Cathedral by 3:45 p.m., they could face University sanctions. All protesters chose to leave the Cathedral, stand on the perimeters of the first and second floors or protest outside of the building.

Sharon Bennett, a junior undeclared major who mediated between their fellow protesters and Pitt while in the Cathedral, said entering the building helped get the protesters closer to their goal of Pitt taking action against sexual assault.

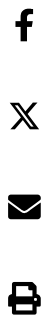
“Because of our protest tonight, we have been put in direct communication with Student Affairs, and we will most likely in the near future see action on this issue,” Bennett announced to the protesters, who cheered.

Bennett later clarified to The Pitt News that Steven Anderson, associate dean and director of residence life, shared his personal contact information with them and said he wants to schedule a meeting with students to talk about their concerns. Bennett said they are looking for other students to join them in the meeting.

After hearing that some of their concerns were heard by the administration, most protesters left the Cathedral. However, about 20 or 30 stayed around the perimeter of the first and second floors, and as the Pitt marching band began playing on the steps of the Cathedral around 3:45 p.m., they left to stand among the band, holding up signs and chanting. More protesters eventually joined in the crowd below.

“Yay, we have the marching band at a crime scene,” a protester yelled sarcastically.

The marching band eventually left the Cathedral steps and protesters took their place, holding up signs reading “Pitt is okay with SA.” “You are not alone” and



"We shouldn't be scared to go to class." Shortly after 4 p.m., the remaining protesters finally left the Cathedral, though some said they would return to continue their protest at the Homecoming Laser and Fireworks Show Friday night.

Hope Karnes, a sophomore nursing major who leads Take Back the Night Pitt as the club's president, said any survivors of sexual assault can come to Take Back the Night Pitt for help and resources.

"If you need support, please reach out for support, reach out to our organization, reach out to the resources on our Instagram," Karnes said. "Please do not do this alone."

Teaching Surveys will be open April 1 to April 23.

Students are encouraged to provide feedback about their classes by completing their OMETs.

University of Pittsburgh teaching.pitt.edu/omet Teaching Surveys

Click here for more information on resources for sexual assault survivors.

- [pitt police](#)
- [sexual assault](#)
- [title IX](#)

About the Writer

Alexandra Ross, Assistant News Editor

- [f](#)
- [@](#)
- [X](#)
- [d](#)
- [in](#)
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Exhibit 13

THE RED ZONE

Fed up with Red Zone sexual assaults, Pitt students demand safety measures

Reports of an afternoon assault in the Cathedral of Learning spurred fear, but also concrete demands for change.



Emma Folts

October 7, 2022



Mia Larkin, a University of Pittsburgh student and sexual assault survivor, at the University of Pittsburgh's Frick Fine Arts Building in a September 2022 portrait. (Photo by Stephanie Strasburg/PublicSource)

Days after a female student at the University of Pittsburgh was sexually assaulted in a stairwell in the Cathedral of Learning, about 100 students attended a protest outside the building to condemn the attack and call on Pitt to improve student safety.

Late Monday afternoon, an unknown college-age man pushed the student, held her against a wall and sexually assaulted her, according to a crime alert from the university. The attack was reported to campus police on Wednesday.

“That is completely unbelievable, terrifying, horrifying in every way. This is a very immediate threat to our safety,” said Hope Karnes, a sophomore and president of the university’s chapter of Take Back The Night, in an interview. “I feel scared. If someone can get assaulted in a stairway at 4 p.m., I don’t know.”

“I was just really upset because you know, it’s during class time when we should feel most safe,” said student Angie Escobar. “We’re just here for our education. And we shouldn’t have to worry about getting raped.”

An anonymous Pitt student created a [Change.org petition](#) on Thursday with details about the peaceful protest. The petition calls on the university to generally restrict public access to university buildings and require university I.D. for entrance; to leave stairwell doors open; to monitor security cameras regularly; and to expel students for all rape attempts. As of Friday afternoon, the petition had received nearly 6,000 signatures.



More than half of sexual assaults among college students occur in the fall. Resources, survivor stories and investigation into what’s being done to protect those at risk in the Pittsburgh area. [Explore the series.](#)

Pittsburgh college students: If you’ve experienced sexual violence, these local resources can help.

It can be a confusing and traumatic time. This guide can answer some questions about medical care, Title IX and counseling.



Several students on Friday said they’d like to see increased security on Pitt’s campus. Katherine Lowell, a pharmacy student who attended the protest, said she’d like the university to implement swipe I.D. access to university buildings and keep records of the people who enter.

During the protest, another student expressed concern over the security of on-campus buildings, according to a [video by The Pitt News](#).

“I see random adults in Cathy all day, and I can’t tell you a single one of their names. I don’t know what they’re doing here or why they’re here. I don’t care about the tours,” the student said, using the common student nickname for the Cathedral, a frequent stop for visitors to the city. “There is no reason why Pitt should not be protecting their students, and that is why we are here today, and that is what Pitt needs to listen to.”



About 100 students attended a protest Friday outside the Cathedral of Learning on Pitt's campus to condemn an attack on a female student in a stairwell of the building and call on Pitt to improve student safety. (Photos by Emma Folts/PublicSource)

Chuck Finder, a spokesperson for Pitt, said that the university has increased the presence and patrols of police and security at the Cathedral and has stationed officers with its Community Programs Unit on site. The unit will be able to speak with students, faculty and staff and answer questions, according to an email to the Pitt community from Ted Fritz, vice chancellor of public safety and emergency management.

Fritz said in the email that the university has security measures in place in all campus buildings, including 1,000 closed circuit cameras on the Pittsburgh campus.

There are no updates in the investigation at this time, Finder said.

In an email to Pitt students and their families, Dean of Students Carla Panzella pledged a town hall meeting, coordinated with the Student Government Board, to solicit concerns and get feedback on the university's response to such incidents.

Protesters gathered in the center of the Cathedral's first floor shortly after 3 p.m., but campus police later told them that they could face university sanctions if they did not leave the area by 3:45 p.m., according to [The Pitt News](#).

Later in the afternoon, the university marching band began to perform outside of the Cathedral for what appeared to be a Homecoming celebration. Student protesters remained, shouting "support survivors!" and chanting "keep campus safe!" over and in between the songs.

More Red Zone stories



Pittsburgh higher ed steps up sexual assault interventions ahead of annual spike in cases



Pitt's handling of Dior Johnson domestic violence case sends mixed messages about sport and survivor support



College men can play a crucial role in preventing sexual violence. Here's how some are stepping up.

Jun Kyoung Kim, a student who signed the petition, said that the university's lack of action in response to the sexual assault, along with its continuation of Homecoming celebrations, makes her upset and angry. Escobar said it shows that Pitt "is more into their festivities than into protecting the students."



The University of Pittsburgh's Cathedral of Learning is lit up with fireworks on Friday, Oct. 7, 2022, in Oakland. The celebration came hours after a protest was held outside on the lawn for higher safety measures for students, spurred by the sexual assault of a student in the building days earlier. (Photo by Lilly Kubit/PublicSource)

"There should not be a celebration where someone was raped!" sophomore Alea Gentile shouted as the performance continued.

Gentile, who is a survivor of sexual assault, also called on Pitt to improve the way it supports survivors, specifically referencing the Title IX process, disability resources and therapy services.

"Everyone needs to be aware. They should feel uncomfortable. They should feel called out. And they should make a change, because that's all we want," she said. "This can't keep happening."

She added: "I just want to say to the victim that you can see how much we all care. We're all angry, we're all upset. We all know exactly what you're going through and we are here for you no matter what."

This post has been updated with additional information from The Pitt News.

Emma Folts covers higher education at PublicSource, in partnership with Open Campus. She can be reached at emma@publicsource.org.

Community callout: Are you a Pittsburgh-area college student who has experienced sexual violence or misconduct?

We'd like to hear
your story

Explore this series



The Red Zone

More than half of sexual assaults among college students occur in the fall. Resources, survivor stories and investigation into what's being done to protect those at risk in the Pittsburgh area.

Exhibit 14

 **FREE** 
PALESTINE!

JOIN US IN
SOLIDARITY

THIS FINALS SEASON
REMEMBER
THERE ARE NO
UNIVERSITIES IN
GAZA

429 days
OF GENOCIDE

- **186,000+** KILLED
1/3 WOMEN + CHILDREN
- **86% OF GAZANS**
FACE CRISIS-LEVEL HUNGER
- **HIGHEST #**
OF CHILD AMPUTEES PER CAPITA
- **87% OF SCHOOLS**
TARGETED BY ISRAELI AIRSTRIKES
- **ALL HOSPITALS**
RENDERER FULLY OR PARTIALLY INOPERABLE
- NOWHERE IN GAZA
IS SAFE**

22:49

5G



December 9, 2024 8:48 AM



More support is needed at the sit in! Please come and bring your friends ASAP!

Add a comment...



Activity



Share



Highlight



More



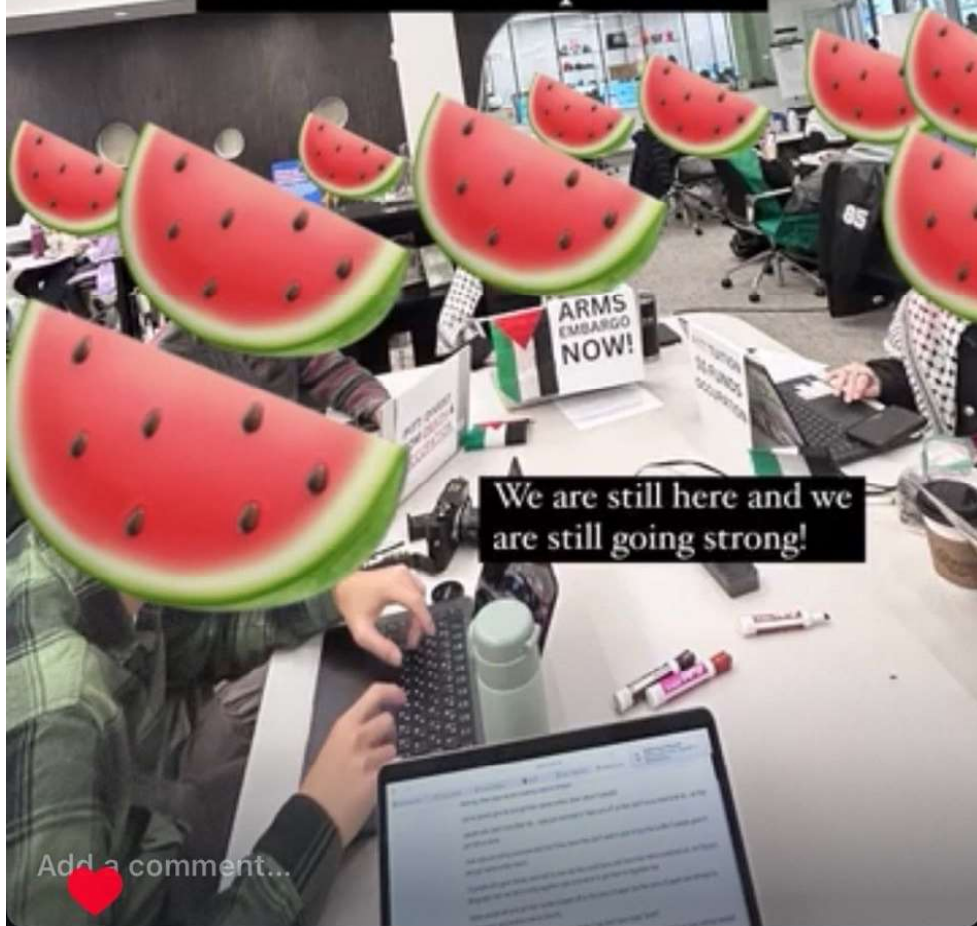
December 9, 2024 5:57 PM

Saint Levant, 47SOUL · DALOONA (feat. Sh... >



**!! Be here at 6AM
TOMORROW
December 10 !!**

**We need the people to
show up and show their
solidarity towards the
Palestinian People 🇵🇸 !!**



Add a comment...





December 11, 2024 12:26 AM



Night 3 🌙

Students continue to study in solidarity with Palestine at Shaban al-Dalou Library! 🇵🇸🇵🇸🇵🇸



Add a comment...



Activity



Share



Highlight



More

16:03



December 11, 2024 7:48 PM



📌 Update from Shaban Al- Dalou Library 📌:

Students have now been studying in solidarity with Gaza for over 60 consecutive hours. While this has been no easy feat, students have gained strength and inspiration from the steadfastness of the Palestinian people who have endured for the past 432 days the most unimaginable and inconceivable horrors of the Zionist entity.

All are welcomed and encouraged to display solidarity for our fellow huamns in Gaza who have for over a year now taught the world what true resilience and humanity looks like.

NO FOOD HAS ENTERED NORTH GAZA IN 66 DAYS

THERE ARE NO UNIVERSITIES LEFT IN GAZA

Until liberation. 🇵🇸👉

📍
Add comment...

Activity

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16:03



December 12, 2024 3:54 AM

Walla Wtalla'anahoum Bar... >



NIGHT 4: SHABAN AL-DALOU LIBRARY 🇸🇪 🇯🇴 🇵🇸



Walla Wtalla'anahoum Ba...
Ahmad Kaabour

Add Comment...

Activity

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Exhibit 15



Pittsburgh - Central Oakland

December 11, 2024 3:07 AM

Edit



LIVE

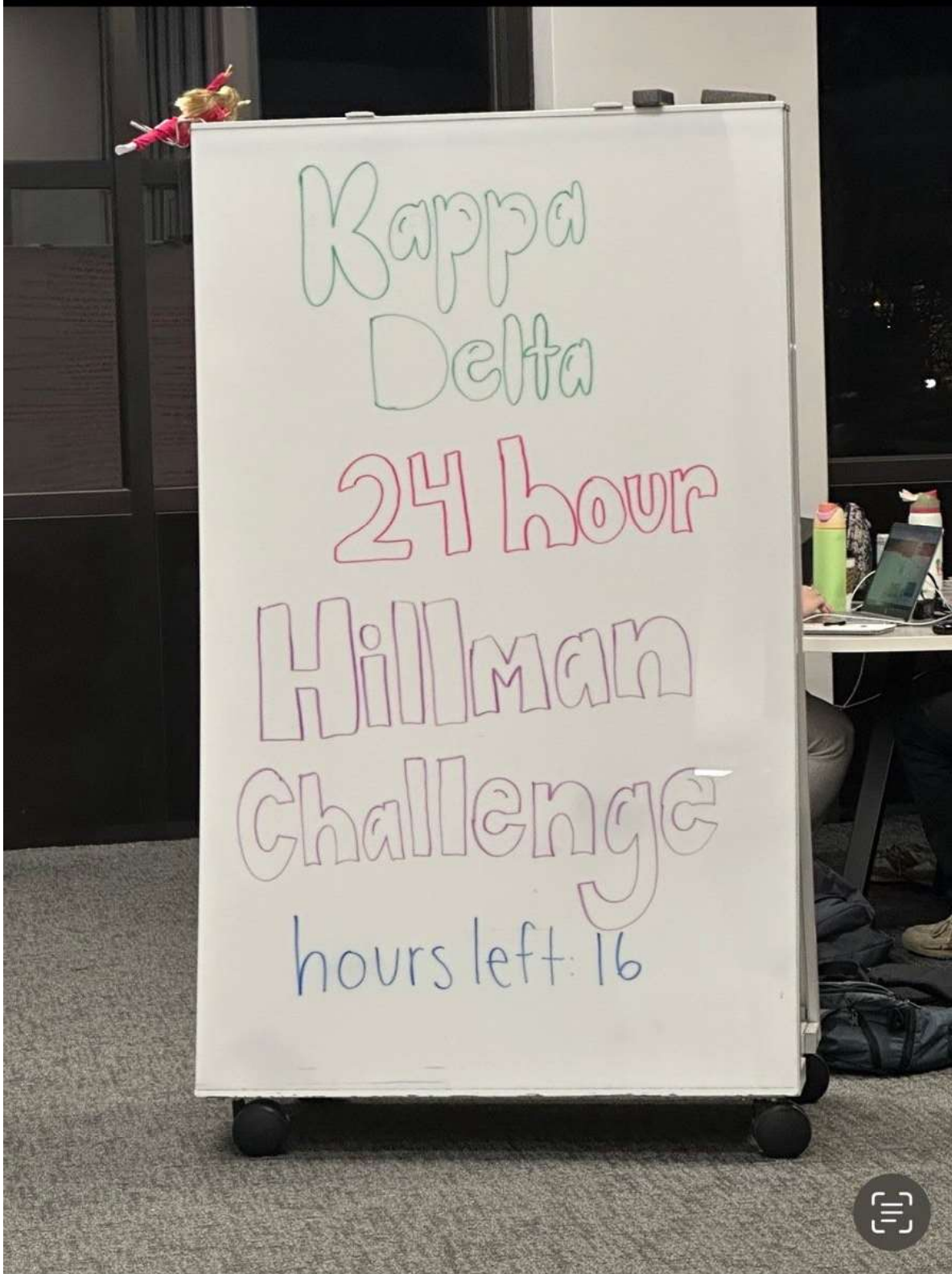


Exhibit 16



Re: Important information about Students for Justice in Palestine event tomorrow

From Karin Asher <karin.asher@pitt.edu>

Date Wed 12/11/2024 21:18

To [REDACTED]

Cc [REDACTED]

Dear [REDACTED]

Thanks for reaching out with your questions. Events are generally characterized by planning and organization across one or more student organizations or the student body with a specified purpose, activity, or speaker, and can also include invitations to join/gather or promotion for attendance in advance. They may include signage, tabling, or announcements of the purpose of the gathering that distinguish them from an unplanned gathering. The University's policies and procedures around events are content neutral.

In the case of Monday's event, that particular space in Hillman Library is not one of their reservable spaces. You can find the Library Space Use policies here: <https://library.pitt.edu/library-space-use-policy>.

Additionally, we recently streamlined some of the reservation and event planning guidelines which support prompt coordination of events with the intent to reduce and remove as many barriers to advance event planning as possible.

Thank you,
Dr. Asher

Karin Asher, Ed.D. (she/her/hers)
Assistant Dean of Student Engagement and Professional Development
Division of Student Affairs
karin.asher@pitt.edu

From: [REDACTED]
Date: Tuesday, December 10, 2024 at 12:19 AM
Karin Asher <karin.asher@pitt.edu>.

Cc: [REDACTED]
Subject: Re: Important information about Students for Justice in Palestine event tomorrow

Dear Karin,

I was not present for any discussions that you may have had with students today, nor am I aware of any representatives from our organisation who spoke with you. As such, I would appreciate clarification on a few points to ensure that SJP continues to fully understand and comply with University policies.

Specifically, I would like to better understand the distinction between the following two statements:

- "The space utilized today and promoted for tomorrow is not a reservable space and scheduled events may not be held there."

- "Students are welcome to study without otherwise staging an event."

Could you kindly clarify what distinguishes students studying from "staging an event," and what constitutes an event more broadly? Does this distinction hinge on the scheduling of a specific time? I have reviewed the University's Free Speech and event planning guidelines but remain unable to locate a precise definition; thus, I would appreciate it if you could share the document or policy that explicitly outlines these definitions and criteria.

Understanding these nuances will help us ensure that our social media activities align with University policies moving forward.

Best

From: Karin Asher <karin.asher@pitt.edu>

Sent: Monday, December 9, 2024 22:51

To:

Cc:

Subject: Important information about Students for Justice in Palestine event tomorrow

Dear Students for Justice in Palestine Officers,

As leaders of Students for Justice in Palestine at Pitt, I am reaching out regarding the upcoming event that has been promoted by your organization, advertised for tomorrow, December 10 at 6:00 am, in Hillman Library. The space utilized today and promoted for tomorrow is not a reservable space and scheduled events may not be held there. Students are welcome to study without otherwise staging an event. Reservations for other spaces on other dates may be made by student organizations by contacting the William Pitt Union reservations office.

I want to note that today, representatives of your organization were asked to comply with University policies and were provided the opportunity to ask questions and come into compliance with policies. Unfortunately, the group failed to fully comply with requests and only left the event after student IDs were requested for conduct referrals. Holding a similar event tomorrow or on additional days will result in immediate referral to the Student Conduct process for individuals involved as well as your student organization.

As a reminder, as a registered student organization, it is your obligation to uphold University policies and guidelines when you hold, promote, or engage with events. I want to draw your attention to several relevant guidelines and policies, listed below. In addition to the Universities policies relating to demonstrations and/or protests on campus, students engaged in such activities on campus must follow the [Student Code of Conduct](#). If individuals attend this event held in a non-reservable space, they will be asked to leave. Failure to comply with requests from a University official will result in immediate referral to the Student Conduct process.

- [On Campus Demonstration and Protest Guidelines](#)
- [Event Planning Guidelines for Student Organizations](#)
- Please visit [FreeSpeech.pitt.edu](https://www.pitt.edu/~free-speech/) for more information

As part of my role in the Office of the Dean of Students, I am responsible for ensuring that registered student organizations have the resources and support needed to plan and execute their programs in full compliance with University policies. It is imperative that you review these resources and policies carefully and follow them when planning future events. If you have any questions about these policies, contact me directly.

Best,
Dr. Asher

Karin Asher, Ed.D. (she/her/hers)
Assistant Dean of Student Engagement and Professional Development
Division of Student Affairs
karin.asher@pitt.edu

Exhibit 17

University of Pittsburgh



Student Code of Conduct **Effective August 1, 2024**

Division of Student Affairs

www.studentaffairs.pitt.edu/conduct

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Introduction

Being a member of the University of Pittsburgh community is a privilege. This privilege comes with the responsibility to act in accordance with all institutional rules and policies. This *Student Code of Conduct (Code)* provides information on behavioral expectations and outlines the processes used to address Violations of these expectations.

The Board of Trustees has the authority to establish regulations and standards for Students. Responsibility for these regulations and standards is delegated to the Chancellor and in turn to specified administrative officials. The Board of Trustees and University administrators acknowledge and affirm the rights and responsibilities of Students – as members of society, as guaranteed, and expressed by federal, state, and local laws.

The *Code* is subject to change at the discretion of the University. All Students are expected to familiarize themselves with and are required to abide by the provisions of the current *Code*. To ensure you have the most recent version, please visit www.studentaffairs.pitt.edu/conduct/. Copies of the *Code* are available at the Office of Student Conduct, 725 William Pitt Union.

This *Code* is not a contract.

Academic integrity issues fall within the authority of the University's individual academic departments and their Academic Integrity Policies.

Non-Discrimination Statement

The University of Pittsburgh values equality of opportunity and prohibits unlawful discrimination. Find the full Notice of Non-Discrimination within [University Policy CS 07 Nondiscrimination, Equal Opportunity, and Affirmative Action](#).

Application, Scope, and Jurisdiction of the *Code*

Students and/or Registered Student Organizations may be charged with *Code* Violations. Additionally, individual members of Registered Student Organizations may be held accountable for *Code* Violations when they participate in any Violation committed by the Registered Student Organization.

Students are expected to conduct themselves as responsible members of the University community. Students and Student Organizations who violate the *Code* will be subject to disciplinary action by the University when such conduct takes place on University Property or in the course of a University-sponsored or University-supervised activity.

Conduct off-campus also may be subject to disciplinary action by the University if that conduct: 1) threatens the health, welfare, safety, or educational environment of the University community or any individual member thereof, or otherwise disrupts the neighboring environments; and/or 2) is considered by the University to be a serious offense that would negatively reflect upon the Student's character and fitness as a member of the Student body; and/or 3) is an incident occurring within the University of Pittsburgh Police jurisdiction.

Regional campuses also may have campus-specific policies and procedures which should be consulted as applicable.

Student Conduct Record Retention Policy

The Office of Student Conduct maintains conduct records for a period of seven (7) years from the date of the incident. For all pending incidents and incidents resulting in University Housing Dismissal, Disciplinary Suspension or Disciplinary Dismissal, the conduct record will be maintained permanently.

Student Conduct Expungement

Giving current/former Students the opportunity to expunge a responsible finding for a conduct violation reflects the philosophy that Students learn from their interactions with the conduct process and that self-reflection and self-knowledge can produce change in individuals. Each case is unique, and the decision to approve an expungement will be based on individual circumstances.

Even though a student's conduct violation may be expunged, both the student and University may need to disclose the expunged record to third party requestors. For example, requestors performing background checks on students, such as study abroad programs, potential employers, Medical Boards or Bar examiners, etc.

The decision to disclose an expunged record will be based on the scope of the inquiry. All disclosures of student conduct records shall be made in accordance with the [Family Educational Rights and Privacy Act \(FERPA\)](#), and the [University's Access to and Release of Education Records Policy](#).

Expungement Process

Current/former Students may apply to have a responsible finding of a conduct violation(s) expunged if the following criteria have been met:

- Two calendar years have elapsed since the incident date.
- The sanctions did not include Suspension or Dismissal.
- The student completed all sanctions on time.

Discretion to expunge a responsible finding for a conduct violation rests with the Office of Student Conduct staff. Applications for expungement are reviewed by the Office of Student Conduct staff after the student has submitted a completed application for expungement along with any relevant supporting documentation, such as a reference letter, grade transcript, evidence of personal growth, a sustained commitment to abiding by the *Student Code of Conduct* and/or any other facts and circumstances the student would like the Office of Student Conduct to consider.

If a Student violates the Code after the responsible finding for a conduct violation(s) has been expunged, their expunged finding(s) will be reinstated.

CHAPTER 1: Student Rights and Responsibilities

Student Rights Within the University Community

With the approval of the Board of Trustees, the University affirms the following Student rights and privileges:

- ◆ To engage in discussion, to make inquiries, to exchange thought and opinion, to publish and exchange findings and recommendations, to speak, write, or print freely on any subject, and to sponsor speakers of their choice, in accordance with the guarantees of our Federal and State Constitutions, subject only to the right of the University to make reasonable rules and regulations related thereto.
- ◆ To associate with whomsoever, they please.
- ◆ To engage in the educational process.
- ◆ To engage in peaceful, orderly, and nondestructive picketing, protests, and demonstrations, to the extent they do not violate public law and do not interfere with the educational process or the rights of other members of the University.
- ◆ To be free from discrimination on the basis of race, color, religion, national origin, ancestry, sex, age, marital status, familial status, sexual orientation, gender identity and expression, genetic information, disability, or status as a veteran.
- ◆ To be secure in their persons, living quarters, papers, and effects from unreasonable, illegal, or unauthorized searches and seizures; and in the event of a legally authorized search, whenever possible to have present an official of the University and the Student against whom the legally authorized search is directed.
- ◆ To be free from violence, force, the threat of force, entrapment, and coercion.
- ◆ To organize one's own personal behavior as long as such behavior does not violate public law or the rights of others and does not interfere with the educational process.
- ◆ To be informed of the standards and the norms of conduct established by the University and the right to have advance notice of any Sanctions for violations thereof.
- ◆ To have the benefit of fair and equitable procedures for determining the validity of charges of alleged violations of the University standards of conduct. All procedures shall be structured to facilitate a reliable determination of the truth or falsity of charges while providing due process and fundamental fairness to all persons.
- ◆ To retain unaltered status as a member of the University community and to be present on campus and attend classes during the consideration of any disciplinary matter, except for reasons relating to the safety and well-being of members of the University community or University Property or a Student's physical or emotional safety and well-being.
- ◆ To petition for redress of a grievance arising from negligent, malicious, or irresponsible actions of a member of the University community.
- ◆ To have University records reflect only such information as is reasonably related to the educational process of the University.

- ◆ To be informed of the existence, custodianship, and general character of all personal records maintained by the University.
- ◆ To inspect all personal records, except records determined to be confidential in accordance with properly established criteria.
- ◆ To have protection from disclosure of personal records to unauthorized persons. Information will not be released outside of the University community without the expressed consent of or waiver by the Student involved, except under valid legal compulsion or where there is a clear and present danger to a member of the University community, in which case the Student will be informed of any such release.
- ◆ To establish and elect a representative democratic student government which is accountable to the University and the Student community.
- ◆ To be heard and have one's views considered at appropriate levels of the decision-making process within the University community.
- ◆ To use designated University facilities as individuals and members of Registered Student Organizations for extracurricular activities sponsored by Registered Student Organizations and Student groups, subject to the priority of academic needs and to reasonable University rules and regulations regarding use of facilities.

Student Rights under FERPA

The Annual Notification of Rights under the Family Educational Rights and Privacy Act (FERPA), as well as more information about the University's FERPA policy and procedures, is available through the following resources.

[Annual Notification of Rights](#)

[Policy AC 04 and Procedure](#)

[Compliance, Investigations, and Ethics](#)

[Office of the University Registrar](#)

Guardian Notifications for Drug and Alcohol Violations

FERPA permits the University to notify parent(s)/guardian(s) when a Student who is under the age of twenty-one (21) is found responsible for or admits to an alcohol or other drug Violation.

Notification to parent(s)/guardian(s) of such Violations is part of a strategy to connect parent(s)/guardian(s) with appropriate University representatives to reduce the risk of University Students developing patterns of behavior that may jeopardize their academic success, health, or well-being. Under special circumstances, professional staff at the University may use their discretion to determine whether this notification is in the best interest of the Student.

When and how parent(s)/guardian(s) may be notified:

Parent(s)/guardian(s) may be notified via a written letter when the appeals period has ended, and a Student is found responsible for an alcohol or other drug Violation. This does not include Students

who are sanctioned solely for being "knowingly present" during alcohol or other drug Violations.

Who should parents/guardians contact if they have any questions?

The Guardian Notification Letter will identify who to contact for additional information. Before calling for more information, the University encourages parent(s)/guardian(s) to speak to their Student to see if the Student requires any assistance and to encourage the Student to make responsible choices that will help the Student avoid future conduct Violations. If parent(s)/guardian(s) want to speak with staff, they should have their Student provide written permission to the staff member who signed the guardian notification letter.

Student Identification Requirements

Students are required to carry their valid University ID (Panther cards) at all times. Students are required to present their valid University ID when requested by an authorized University official. Additionally, all residence hall Students must carry, and present, their valid University ID to gain access into their assigned residence halls.

Communication Requirements

Hearing Officers will communicate with students primarily via University-sponsored email accounts. This *Code* also will be sent to University-sponsored email accounts in August. All other updates can be found on the website <https://www.studentaffairs.pitt.edu/conduct/>. Students are responsible for checking their University email accounts on a regular basis.

CHAPTER 4: Violations of the *Student Code of Conduct*¹

A Violation is committed when a Student or a Registered Student Organization:

1. Violates any federal, state, or local law(s), or while abroad, violates any international law(s).
2. Engages in conduct which is disorderly, lewd, or indecent or a breach of peace; or aids, abets, or procures another to do the same.
3. Possesses, consumes, or is under the influence of alcohol if under the age of 21, or dispenses alcohol to an individual who is under the age of 21.
4. Is knowingly present during the commission of the Violation(s) of "possesses or consumes alcohol if under the age of 21 or dispenses alcohol to an individual who is under the age of 21."
5. Consuming, carrying, or possessing an open container of alcohol in the public right-of-way, or on private property without the consent of the landowner or tenant, except as permitted by law.
6. Operates a motor vehicle while impaired by or under the influence of alcohol and other drugs.
7. Uses, misuses, possesses, distributes, manufactures, sells, or is under the influence of narcotics, hallucinogens, dangerous drugs, controlled or illicit substances except as permitted by law, or possesses paraphernalia which can be demonstrated to be linked to drug activity, such as pipes with drug residue. This includes the misuse of over-the-counter substances. The use or possession of marijuana (medical or otherwise) in the workplace and on campus is restricted by federal laws, such as the federal Safe and Drug Free Schools and Communities Act and the Drug-Free Workplace Act. Accordingly, the University of Pittsburgh prohibits the use or possession of marijuana on campus.
8. Is knowingly present during the commission of Violation(s) of "uses, misuses, possesses, distributes, manufactures, sells, or is under the influence of narcotics, hallucinogens, dangerous drugs, controlled or illicit substances except as permitted by law, or possesses paraphernalia which can be demonstrated to be linked to drug activity, such as pipes with drug residue."
9. Without authority or consent, limits, or restricts the freedom of a person to move about in a lawful manner.
10. Physically abuses, injures, or endangers a person's health, welfare, or safety.
11. Threatens, intimidates, coerces, or uses physical force in a manner which causes another person to be reasonably apprehensive or which endangers a person's health, welfare, or safety.

¹ Please note that just because the expression of an idea or point of view may be offensive or inflammatory, it is not necessarily a Violation of the *Code*. The University values freedom of expression and the open exchange of ideas, and the expression of controversial ideas and differing views is a vital part of the University's mission.

12. Engages in Harassment. Harassment includes unwelcome conduct, through verbal, physical, or electronic means, that based on the totality of the circumstances, is subjectively and objectively offensive and is so severe or pervasive that it limits or denies a person's ability to participate in or benefit from the recipient's education program or activity (i.e., creates a hostile environment). This provision is not intended to prohibit constitutionally protected activity. To the extent that such conduct is connected to allegations of harassment on the basis of a protected class, it will generally be adjudicated as a violation of the applicable policy and not this provision.
13. Violates the [Sexual Misconduct Policy](#) including, but not limited to:
 - a. Sexual Assault
 - b. Relationship Violence
 - c. Sexual Harassment
 - d. Stalking/Cyberstalking
14. Violates the [Title IX Policy](#) including, but not limited to:
 - a. Sexual Assault
 - b. Relationship Violence
 - c. Sexual Harassment
 - d. Stalking/Cyberstalking
15. Assists in the Violation of the [Title IX Policy](#).
16. Violates the University of Pittsburgh [Anti-Hazing Statement](#).
17. Assists in the Violation of the University of Pittsburgh [Anti-Hazing Statement](#).
18. Operates, provides assistance to, or in any way perpetuates activities that give the impression or appearance that a group is a Registered Student Organization, when that group has not registered as a student organization, has lost or been denied University registration or recognition, or has been dissolved as a consequence of responsibility for *Code* and/or other policy Violations, even if operating under a different name.
19. Violates or assists in the Violation of any policy, procedure or guideline of the University including, but not limited to the following:
 - a. [University of Pittsburgh Non-Discrimination, Equal Opportunity, and Affirmative Action Policy](#)
 - b. [University of Pittsburgh Registered Student Organization Registration Guidelines](#)
 - c. [University of Pittsburgh Student Union's Policies and Procedures Handbook](#)
 - d. [University of Pittsburgh Drug Free Workplace/Drug Free Schools Policy](#)
 - e. [University of Pittsburgh Smoking Policy](#)
 - f. University of Pittsburgh [Office of Fraternity and Sorority Life Policies and Procedures Manual](#)
 - g. [Housing and Dining Services Contract](#), [The Registered Student Organizations Handbook](#), the [Club Sports Handbook](#)
 - h. [Any Computing Services and Systems Development Policy](#)
 - i. Any provision of the [University of Pittsburgh Posting and Chalking Guidelines](#)
 - j. Any provision of the [University of Pittsburgh Demonstration Guidelines](#)
 - k. Any other policy, procedure, or guideline of the University whether or not listed in the *Code*

20. Engages in retaliation in connection with any reported violation of this *Code*.²
21. Violates any provision of the [Residential Handbook](#) including, but not limited to:
 - a. Quiet Hours
 - b. Visitation
 - c. Health and Safety
 - d. University-owned Housing Alcohol
 - e. Other
22. Obstructs, interferes with, or denies another Student's Rights and Responsibilities affirmed by the Board of Trustees (please see the Rights listed in [Chapter 1](#)).
23. Uses, possesses, or manufactures firearms, explosives, weapons, fireworks or other dangerous articles or substances injurious to person or property, or objects that mimic or look/function like these objects, while on University Property.
24. Activates emergency warning equipment, communicates false information regarding any emergency situation, or fails to exit any University property when emergency warnings are issued.
25. Abuses, removes, damages, or alters fire safety equipment, security equipment, and/or exit signs.
26. Ignites or burns materials, including but not limited to incense and candles, without proper authorization, while on University Property.
27. Throws anything from windows, balconies, patios, or any other area of any University building.
28. Affixes, implants, or otherwise fastens any object to any University Property floors, ceilings, windows, or walls which might stain, scar, vandalize, or otherwise cause damage to said property.
29. Without proper authorization, lends and/or misuses University identification or keys.
30. Without proper authorization, lends, possesses, abuses, damages, destroys, removes, (mis)uses, misappropriates, or sells the property of another, including, a business or the University.
31. Obtains the personal information of another person by misrepresentation or fraudulent means.
32. Without proper authorization enters or uses property of another, a business, or the University.
33. Forges, alters, takes possession of, duplicates, or uses documents, records, keys, identification, or computer accounts without proper authorization.
34. Fails to present University identification or gives false identification or identifying information upon the request of an authorized University official.
35. Falsifies information or records submitted to a University official or office.
36. Fails without just cause to comply with the lawful direction of a University official, or other lawful

² The process afforded to students accused of retaliation is tied to the underlying allegations. For example, retaliation in connection with hazing, sexual misconduct, sexual harassment, or nondiscrimination will follow the corresponding investigative process for those policies and *Code* provisions. All other forms of retaliation will follow the conduct process outlined in Chapter 5.

authority having just cause and acting in the performance of their duties and authority.

37. Engages in solicitation of any type (including non-University commercial activity) on University Property unless approved in advance by an appropriate University official.
38. Participates in the sale or misuse of class materials including but not limited to recordings, papers, examinations, or any other class materials.
39. Disrupts or prevents the peaceful and orderly conduct of classes, lectures, quiet study, speaker presentations, and/or meetings or deliberately interferes with the freedom of any person to express their views.
40. Engages in any act or preparation intended to result in a *Code Violation*, which, if not prevented, would have resulted in the completion of the act intended.
41. Obstructs or interferes with the apprehension or investigation of a Student who may be involved in the commission of a *Code Violation*.
42. Intimidates, coerces, influences, or attempts to do the same against a person who is participating or has participated in any University process or proceeding.
43. Disrupts or interferes with the conduct process.
44. Makes or distributes any photograph, audio, or video recording of any person in Violation of federal, state, or local law.
45. Engages in games of chance in Violation of federal, state, or local law.
46. Fails to comply with guidance set forth by the University, federal, state and/or local authorities, or host governments while abroad regarding public health and/or safety.

CHAPTER 5: Process and Procedures: From Referral to Resolution

Applicability

Except as otherwise specified herein, the processes and procedures in this Chapter do **not** apply to alleged Violations of the University's Sexual Misconduct policy (CS 20) or Title IX policy (CS 27). Alleged conduct under those policies are addressed in Chapter 6 and Chapter 7, respectively.

Student Rights Within the University Community

Student Rights Within the University Community are listed in [Chapter 1](#) of this *Code*.

Commonly Used Terms

Adjudication: Completion of any investigative, hearing and/or accompanying Appeal process.

Complainant: A University community member who files a referral that alleges a Violation of the *Code*.

Conduct Referral: A report alleging Violations of the *Code*.

Level I Hearing: A meeting to determine an alleged Violation of the *Code* where a Respondent may receive a Sanction up to and including Disciplinary Probation or Housing Suspension.

Level II Hearing: A meeting or series of meetings to determine an alleged Violation of the *Code* where a Respondent may receive a Sanction up to and including Disciplinary Dismissal.

Respondent: Student/Registered Student Organization alleged to have violated the *Code*.

Process and Procedures

A. Filing a Conduct Referral

The University's Conduct Process is initiated when a University member files a Conduct Referral against a Student/Registered Student Organization alleging that there has been a Violation of the *Code*.

Any University Member who has witnessed, has been subject to or has knowledge of a potential Violation of the *Code* may contact the Office of Student Conduct to complete a Conduct Referral.

Conduct Referrals which allege Violations of Hazing will proceed under Chapter 3 of this *Code*.

Conduct Referrals which allege Violations of the [Sexual Misconduct Policy \(CS 20\)](#) or [Title IX Policy \(CS 27\)](#) will proceed under [Chapter 6](#) and [Chapter 7](#) (respectively) of this *Code*.

B. Review of the Conduct Referral and Initiation of the Conduct Process

Once a Conduct Referral is submitted, the Director of Student Conduct or their designee will determine

whether the behavior alleged in the Conduct Referral, if substantiated, would constitute a *Code* Violation. In some instances, the Director of Student Conduct or their designee may need to meet with the alleged Complainant or Respondent prior to making this determination.

If it is determined that the Conduct Referral alleges a *Code* Violation, the Director of Student Conduct or their designee will decide if the Conduct Referral will proceed under the Level I or Level II Process. Once this determination is made, the Director of Student Conduct or their designee will notify the Respondent of the next steps in the conduct process by sending an email to the Respondent's University e-mail address.

Most Conduct Referrals proceed under the Level I Hearing Process and are heard by the Office of Student Conduct (or designee), the Student Conduct Peer Review Board or Residence Life staff. Generally, after filing the Conduct Referral, Complainants do not participate in the Level I Hearing Process.

The Level II Hearing Process is facilitated by the Office of Student Conduct. This process is followed when:

1. The alleged Violations may result in Sanctions including, Disciplinary Suspension, Disciplinary Dismissal, or Dismissal from University Housing; or
2. The Respondent is a Registered Student Organization except hazing reports as outlined in [Chapter 3](#); or
3. Deemed appropriate by the Office of Student Conduct.

C. Interim Action

Prior to initiation of the conduct process, the Vice Provost for Student Affairs or their designee may take limited or temporary action to restrict a student or student organization, only to the minimum extent necessary, when there is reasonable cause to believe that the student or student organization's participation in University activities or presence at specified areas of the campus may lead to conduct that threatens the health, safety or well-being of any person, property or University operations.

Examples of behavior that may lead to interim action by the University may include, but are not limited to, being charged with a serious criminal offense, physical violence, sexual harassment, significant disruption of the educational or living environments of the University, significant damage to property, and possession and/or distribution of controlled substances.

Interim actions remain in effect only as long as the Vice Provost for Student Affairs or their designee determines there is a need for such action or until the matter has been investigated, adjudicated, or otherwise resolved in accordance with the Code.

Within ten (10) business days of an interim action, the Student/Registered Student Organization may request, through the [Interim Action Appeal form](#), that the Vice Provost for Student Affairs or their designee reconsider the interim action. This request must include the reasons why the Student/Registered Student Organization believes the interim action should be lifted. The Vice Provost for Student Affairs or their designee will consider the request and advise the Student/Registered Student Organization of any modification to the interim action within five (5) business days of the submission of the request. The interim action remains in place during the Vice Provost for Student Affairs or their designees' review.

Interim action does not replace the conduct process, which shall proceed as outlined in this *Code*.

D. General Information for Respondents and Complainants in both Level I and Level II Hearing Processes and Appeals

In addition to the [Rights](#) affirmed by the Board of Trustees, while the Respondents have the right to

decline to testify against themselves, the Level II Conduct Hearing Board **may** draw an appropriate inference from lack of participation. The Hearing Officer or the Level II Conduct Hearing Board will use a preponderance of the evidence standard (meaning more likely than not) when deciding if a Respondent is responsible for a Violation of the *Code*.

Legal rules regarding the wording of questions, hearsay, and opinions, as well as legal rules regarding admissibility of evidence will not be formally applied. Legal motions will not be entertained, but reasonable rules of relevancy will apply. Reasonable limits may be imposed on the number of factual and/or character witnesses and the amount of cumulative evidence that may be introduced.

Respondents/Complainants have the right to call witnesses during the hearing process. If a Respondent chooses not to participate in any stage of the hearing process, Adjudication may proceed, and Sanctions may be imposed.

Throughout the conduct process, the Complainant and/or Respondent may request to review the Conduct Referral.

If you have a disability and would like to request an accommodation during the conduct process, you are encouraged to contact both the Hearing Officer and Disability Resources and Services (DRS), 140 William Pitt Union, (412) 648-7890, drsrecep@pitt.edu, (412) 228-5347 for P3 ASL users, as early as possible in the process. DRS will engage in the interactive discussion and determine reasonable accommodations for the conduct process.

E. Support People

While not necessary or required, Complainants and Respondents in both the Level I and Level II conduct process are permitted to be accompanied by no more than two support people of their choice. Support people may ask questions regarding the process prior to the hearing. Support people may accompany a party throughout the process but are not authorized to actively participate in the hearing. Any person who was involved in the conduct at issue or might be called as a witness in a case cannot be a support person in that case. Information regarding the processing of any referral will only be shared while the Complainant/Respondent is present.

F. Level I Hearing and Appeal Process

Level I Hearing Process:

- The Hearing Officer will read the alleged *Code* Violations and allow the Respondent to review the Conduct Referral.
- The Respondent will have the opportunity to ask questions and to present relevant information through personal and/or witness testimony and/or documents.
- The Hearing Officer(s) may ask questions regarding any information provided.
- Using a preponderance of the evidence standard, the Hearing Officer will determine if the Respondent is responsible for violating the *Code* and if so, will inform the Respondent of the imposed Sanctions, either at the conclusion of the Level I Hearing or within a reasonable time thereafter.
- If the *Respondent is found responsible for violating the Code*, the Respondent will have the option to:

- a. Accept the findings and imposed Sanctions.
 - b. Accept the findings but reject and appeal the imposed Sanctions.
 - c. Reject the findings and imposed Sanctions and appeal both.
- If the Respondent is *found not responsible* for violating the *Code*, no Sanctions will be imposed.
 - If the Respondent fails to attend the Level I Hearing, the Hearing may proceed in the Respondent's absence and Sanctions may be imposed.

Level I Appeal Process:

Respondents seeking to appeal a Level I Hearing must file an appeal form with the Office of Student Conduct within ten (10) business days of the date of the Hearing decision letter. A link to the appeal form can be found in the decision letter.

The reason for appeal must fall within the scope of review. The scope of review shall be limited to statements and facts supporting one or more of the following questions:

1. Whether [Rights](#) affirmed by the Board of Trustees have been denied.
2. Whether established Level I Hearing procedures were not followed in a manner that would have affected the decision.
3. Whether there was an absence of a rational connection between the facts found and the findings.
4. Whether the issued sanctions are substantially disproportionate to the severity of the Violation.
5. Whether new evidence is presented which was not available or discoverable during the Level I process that if available at the time would have significantly altered the findings or sanctions.

Once the Office of Student Conduct receives a request for an appeal, the Director of Student Conduct or their designee will review and notify the Respondent whether the appeal will be heard. If the appeal is to be heard, the Director of Student Conduct or their designee will notify the Respondent of the date, time, and place of the appeal meeting. Decisions following the appeal meeting are final.

G. Level II Hearing and Appeal Process

Level II Pre-Hearing Process:

When a Conduct Referral falls under the Level II Hearing Process, the Office of Student Conduct will schedule a Disciplinary Conference with the Respondent. The purpose of the Disciplinary Conference, which may occur over a period of several meetings, is to 1) allow the Hearing Officer to discuss the alleged Violation(s) with the Respondent; 2) make recommended Sanction(s), and 3) provide the Respondent the opportunity to choose their response to the Conduct Referral, as defined below:

- a. Accept responsibility for violating the *Code*, accept the recommended Sanction(s) and waive the Level II Hearing and Appeal Process.
- b. Accept the general nature of the Violation(s) and proceeds before the Level II Conduct Hearing Board for a Sanctions-Only Hearing.
- c. Does not accept responsibility for the Violation(s) and proceeds before the Level II Conduct Hearing Board for a Full Hearing.

If the Respondent elects to proceed with a Level II Hearing, the Office of Student Conduct will answer questions regarding the procedures and format of the student conduct process, will schedule the Level II Hearing, and will provide other assistance as appropriate.

Both the Complainant and Respondent will receive an e-mail notification of the date, time, and place of the Level II Hearing. If a party has been sent notice in accordance with the *Code*, and fails to appear at the scheduled date, time, and place, the Level II Hearing may be held in the party's absence.

Witnesses

The Complainant and Respondent may provide the Hearing Officer with a witness list, containing a brief description of each witness's proposed testimony. This description must be submitted to the Hearing Officer not less than five (5) business days prior to the Level II Hearing date. It is the responsibility of the Complainant and Respondent to coordinate any witness's participation in the Level II Hearing. The Hearing Officer may provide reasonable assistance in facilitating any witness participation.

Where necessitated by fairness, the Hearing Officer may make arrangements for the recorded, telephonic, or written testimony for use in a proceeding.

Both Complainants and Respondents may review, not less than three (3) business days prior to the Level II Hearing date, any approved witness list submitted by the opposing party. To schedule such a review, Complainants and/or Respondents must contact the Office of Student Conduct to make an appointment.

Evidence

The Complainant and Respondent will have the opportunity to submit evidence that they intend to introduce at the Level II Hearing. Such evidence must be submitted to the Hearing Officer not less than five (5) business days prior to the Level II Hearing date. Not less than three (3) business days prior to the Level II Hearing date, both the Complainant and Respondent shall have the opportunity to review all evidence that has been approved for use in the hearing. To schedule such a review, the Complainant and/or Respondent must contact the Office of Student Conduct to make an appointment.

Level II Hearing

The Director of Student Conduct or their designee will serve as the Hearing Moderator for all Level II Hearings.

The Hearing Moderator will convene the Level II Hearing and introduce the parties involved in the proceeding. The Complainant or Respondent may object to the participation of any member of the Level II Conduct Hearing Board or to the procedures, and the Hearing Moderator will make any necessary decisions regarding the validity of such concerns or objections. The Hearing Moderator shall read the alleged Violations.

The Complainant or Respondent will have the opportunity to state their case, offer evidence, and call, question, and cross-examine witnesses. During any presentation, the Hearing Moderator and Level II Conduct Hearing Board Members also will have the opportunity to ask questions to the Complainant, Respondent and any of their witnesses.

At the conclusion of all testimony, the Complainant and Respondent will be given the opportunity to offer a closing statement which may include information regarding the imposition of sanctions.

Deliberations for Sanctions-Only Hearing

1. The Level II Hearing will be concluded, and all participants except the Level II Conduct Hearing Board will be dismissed.
2. The Level II Conduct Hearing Board will deliberate in private.
3. The Level II Conduct Hearing Board will create a written record of Sanctions to recommend to the Vice Provost for Student Affairs or their designee.

Deliberations for Full Hearing

1. The Level II Hearing will be concluded, and all participants except the Level II Conduct Hearing Board will be dismissed.
2. Using the preponderance of the evidence standard, the members of the Level II Conduct Hearing Board will deliberate in private until a finding regarding responsibility is reached.
3. If the Respondent is found responsible, the Level II Conduct Hearing Board will deliberate and create a written record of findings and Sanctions to recommend to the Vice Provost for Student Affairs or their designee.

Hearing Outcome

The Level II Conduct Hearing Board's findings and/or recommendation(s) will be sent to the Vice Provost for Student Affairs. **The Vice Provost for Student Affairs may increase, decrease, or otherwise change the recommended Sanction(s)** if they believe that the totality of circumstances, including but not limited to University precedent, justifies such a change.

The decision of the Vice Provost for Student Affairs shall be sent to the Respondent and appropriate University officials through University email and will set forth any findings regarding responsibility and any sanctions.

Respondents have ten (10) business days from the date of the decision of the Vice Provost for Student Affairs to file a petition for appeal (see page 28). At any time, the Respondent may schedule an appointment with the Office of Student Conduct to review their conduct record.

Addressing Bias Incidents Through the Conduct Process

The University of Pittsburgh is committed to maintaining a campus environment free from unlawful discrimination and harassment. As such, all referrals filed with the Office of Student Conduct will be reviewed to determine if the reported information suggests or demonstrates that the alleged *Code* violation was motivated by bias. Any violation of the University of Pittsburgh *Student Code of Conduct* motivated by a University community member's race, color, religion, national origin, ancestry, sex, age, marital status, familial status, sexual orientation, gender identity and expression, genetic information, disability, status as a veteran or any other protected group status identified in the University's Non-Discrimination, Equal Opportunity and Affirmative Action Policy, will be deemed an aggravating circumstance, and will result in the issuance of an enhanced sanction up to, and including, disciplinary dismissal from the University, and/or the addition of educational sanctions designed to address the demonstrated bias.

Application of Sanction Enhancement

Process for Level I Referrals

If a referral contains information that the underlying conduct may have been motivated by bias, the referral will be forwarded to the Office of Student Conduct. At the respondent's hearing, a Hearing Officer will first determine whether the respondent is responsible for the alleged underlying *Code* violation. Upon a finding of responsibility, the Hearing Officer will identify appropriate sanctions for the underlying violation. To determine if the underlying *Code* violation was motivated by bias, the Hearing Officer will consider the referral and all information collected during the hearing. Upon a finding that bias was a motivating factor, the Hearing Officer will elevate the original sanction and/or add sanctions to the original sanction, in order to address the demonstrated bias.

Process for Level II Referrals

If a referral contains information that the underlying conduct may have been motivated by bias, the referral will first be discussed with the respondent at a disciplinary conference, as described under the "Level II Pre-Hearing Process" found on page 24 of this *Code*. During this disciplinary conference, the Hearing Officer will review all information contained in the referral and will discuss the alleged violations with the respondent. If the Hearing Officer, taking as true all facts contained in the Conduct Referral finds that the alleged underlying *Code* violation was motivated by bias, the Hearing Officer will elevate and/or add to the sanction recommendation. The Respondent will then have the opportunity to choose their response to the Hearing Officer's recommended sanction in accordance with the steps outlined under the "Level II Pre-Hearing Process".

If the Respondent accepts the Hearing Officer's recommended sanctions, the Respondent will waive the right to a Level II Hearing and the Appeal Process and agree to complete all sanctions as directed.

If the Respondent elects a full hearing, the referral will proceed under the full-hearing process (See Chapter 5 of this *Code*). The Conduct Board will determine whether the Respondent is responsible for the alleged underlying *Code* violation(s). To determine if the underlying *Code* Violation was motivated by bias the Conduct board will consider the referral and all information collected during the hearing. If the Conduct Board finds that bias was a motivating factor for the Respondent's violation, the Conduct Board will recommend the application of Sanction Enhancement.

The Conduct Board will forward their findings and recommendation to the Vice Provost for Student Affairs. Vice Provost for Student Affairs, considering the totality of circumstances and University precedent, will apply Sanction Enhancement.

If the Respondent accepts responsibility for the alleged underlying conduct violation, and elects a sanctions-only hearing, the referral will proceed under the sanctions-only hearing process (See Chapter 5 page 25 of this *Code*). The Conduct Board will consider the Respondent's acceptance of responsibility and will assign sanction(s) to the accepted violation(s). To determine if the underlying *Code* violation was motivated by bias the Conduct board will consider the referral and all information collected during the hearing. If the Conduct Board finds that bias was a motivating factor for the Respondent, the Conduct Board will recommend the application of Sanction Enhancement. The Conduct Board will forward their findings and recommendation to the Vice Provost for Student Affairs. The Vice Provost for Student Affairs, considering the totality of circumstances and University precedent as may be applicable, will apply Sanction Enhancement.

Addressing Bias Reports that fall outside of the Conduct Process

There may be situations where a report is focused on an expression of language, or points of view which an individual or a community found to be offensive or inflammatory, but where such expression does not rise to harassment and/or is not connected to any other underlying *Code* violation, or outside the protection of First Amendment rights. In these situations, where the reporting individual(s) or the community requests support, Student Affairs will work with the reporting individual(s) and/or the community to determine the appropriate intervention. To report incidents of bias visit [OEDI](https://www.diversity.pitt.edu/civil-rights-title-ix/make-report/report-form) at <https://www.diversity.pitt.edu/civil-rights-title-ix/make-report/report-form>.

Level II, Hazing, Sexual Misconduct and Nondiscrimination Appeal Process

Petition to Appeal and Request to Postpone Sanctions

Appeal petitions related to Level II Hearings may be filed by Respondents. Appeal petitions related to Sexual Misconduct Violations may be filed by either the Complainant or the Respondent. Persons filing an appeal will have ten (10) business days from the date of the Hearing decision letter to file their petition with the University Review Board (URB), at URBModerator@pitt.edu. The appeal petition must include a thorough statement and all facts or evidence which support one or more of the following (Scope of Review):

1. Whether [Rights](#) affirmed by the Board of Trustees have been denied.
2. Whether established procedures were not followed in a manner that would have affected the decision.
3. Whether there was an absence of a rational connection between the facts found and the findings.
4. Whether the issued sanctions are substantially disproportionate to the severity of the Violation.
5. Whether new evidence is presented which was not available or discoverable during the process that if available at the time would have significantly altered the findings or sanctions.

As discussed under University Review Board procedures, the URB Moderator and applicable URB members will make their determination of whether to proceed with an appeal based on submitted documentation only.

In addition, persons filing an appeal may also request postponement of sanctions pending appeal. Such requests must explain why the imposition of sanctions must be postponed. The question to be answered in determining whether to postpone Sanction(s) is, whether the immediate imposition or postponement of the Sanction(s) will unfairly prejudice either party (the complainant or respondent), pending a final determination of the appeal. Such a request should be filed as soon as practicable following the issuance of the decision.

All decisions regarding the postponement of Sanctions will be made within five (5) business days of the receipt of such a request and will be communicated to appropriate parties in writing through the URB Moderator.

URB Procedures for Reviewing Petition to Appeal

The URB Moderator, in consultation with one Student and one faculty member of the URB, will review petitions and determine whether the petition meets all requirements for filing an appeal; whether the petition raises a question within the Scope of Review; and, whether the appeal will proceed. In cases involving

Sexual Misconduct, the URB Moderator will consult with two faculty members of the URB. The URB Moderator and applicable URB members will make their determination of whether to proceed with an appeal based on submitted documentation only.

Where the URB has determined that an appeal's petition does not fall within the Scope of Review, the URB Moderator and two URB members will render and submit a written opinion and recommended dismissal of appeal, accompanied by the record, to the Provost for review and consideration. Upon completion of this review and consideration, notice of the outcome will be given to the Respondent. In cases involving Sexual Misconduct, both the Complainant and Respondent will receive notice of the outcome of the review of the petition to appeal.

URB Procedures for Proceeding with an Appeal

Where it has been determined that a petition falls within the Scope of Review, the URB Moderator will notify the applicable parties that an appeal has been initiated.

The URB Moderator will then schedule an appeal proceeding. Applicable parties to the appeal proceedings will receive a copy of the appeal petition and procedures and written notification of the time, date, and place of the proceeding.

The appeal will be conducted under the procedural guidance of the URB Moderator, who also shall determine the composition of the URB panel.

The URB panel, in its discretion, may elect to decide an appeal based solely on the submission of documents from the applicable parties, without oral argument. The URB appeal process does not include testimony from witnesses.

If the URB, in its discretion, decides to allow oral argument, applicable parties will be given reasonable time to present their position. A party may refer to any records, documents, or recordings from a prior proceeding and may present written argument. A party may question the other about their argument, except in cases involving Sexual Misconduct. Members of the URB panel and the URB Moderator may question the parties.

The URB panel may remand a matter to the Office of Student Conduct or The Office of Civil Rights and Title IX for further proceedings when the URB panel determines that there are insufficient written findings or prejudicial procedural error. In other cases, the URB panel, by a majority, shall forward a written opinion, recommend action, and complete record to the Provost, or their designee. There may be an accompanying minority opinion.

Once a decision is made by the Provost or their designee, applicable parties will be notified.

URB Structure

The URB shall be a standing body of University community members appointed for staggered terms of two years. Appointment shall be made in the following manner.

1. A sufficient number of faculty members elected by the University Senate.
2. Five (5) graduate and professional Students appointed by the Graduate and Professional Student Association.
3. Five (5) undergraduate Students.
 - a. Two (2) appointed by the General Studies Student Council.
 - b. Three (3) appointed by the Undergraduate Student Government.

In matters involving sexual misconduct, no Students shall be on the panels. Initiated appeals shall be heard by a review board of members. Except in cases involving sexual misconduct, the URB shall be composed of two faculty members and three Students.

URB Moderator

Administrator(s), who shall serve as the URB Moderator, is authorized to:

1. Conduct the administrative and procedural operation of the URB.
2. Determine the appropriateness and completeness of Petitions to the URB in consultation with one Student and one faculty member of the URB.
3. Provide advice and assistance to members of the University community regarding the processing of an appeal.
4. Select members from the URB membership to serve on review boards.
5. Moderate all proceedings before the URB.

Appendix A: Sanctions

The University may impose a wide range of Sanctions for Violations of this *Code*. Any of these Sanctions may be used outside of the conduct process as an interim action to help ensure the health, welfare, safety, or educational environment of the University community or any individual member thereof, or to otherwise limit disruptions to the neighboring environments. Sanctions may be imposed by the Vice Provost for Student Affairs or their designee. A record of imposed Sanctions will be maintained in the Office of Student Conduct and any other appropriate office(s) to which the Sanction(s) or interim action(s) apply.

If a Student fails to complete Sanctions, a hold may be placed on the Student's account and/or the Student may receive additional Violations. Registered Student Organizations that fail to complete Sanctions may receive additional Violations.

Some Sanctions may affect both University and non-University opportunities, including, but not limited to studying abroad, participation in a Registered Student Organization, and employment.

Individual Student Sanctions

Community Engagement — Students are required to complete community engagement that directly address the impact of their behavior. These projects involve meaningful collaboration with the affected parties or community organizations to restore trust and relationships. The Student is responsible for providing verifiable documentation that the community engagement has been completed.

Counseling Assessment (General) — An assessment by the University Counseling Center, which may include recommendations for additional resources.

Counseling Assessment (Substance Use) — An assessment by the University Counseling Center, which may include recommendations for additional resources.

Disciplinary Dismissal — This action results in the permanent separation of the Student from the University, its programs, and facilities. Upon Dismissal, the Student is placed on Persona Non Grata status from all University Property and is not permitted to enter or use University Property unless the Student receives permission from the Vice Provost for Student Affairs or their designee.

In accordance with University Policy, there may be no financial adjustment made to tuition or fee charges for Students who are Disciplinarily Suspended/Dismissed.

Conduct Hold — A restriction placed on a Student's account which may prevent activities, including, but not limited to, registering for classes and/or the issuance of a housing contract. A Conduct Hold permits the release of academic transcripts.

Disciplinary Probation — A designated period of time during which a Student's status is conditioned upon future behavior. The issuance of additional sanctions may occur if the Student is found to be in Violation of any University regulation during the probationary period. During the probationary period, a Student may be excluded from representing the University in intercollegiate athletics, holding a Student officer or similar position, or other extracurricular University activities. Such loss of privilege(s) will depend on each individual set of circumstances.

Educational Sanction — The Respondent is required to complete a project or activity designed to promote learning and prompt changes to behavior and prevent further misconduct. Educational outcomes may include but are not limited to, workshops, seminars, meetings, assignments, and substance use assessments.

Disciplinary Reprimand — A written and/or oral warning to students about their behavior.

Disciplinary Suspension — A termination or a restriction of a Student's ability to register for classes for a period of time. During the Disciplinary Suspension, a Student is excluded from classes and all other University privileges or activities. The Student will be Persona Non Grata from all University Property during the suspension and may not enter or use University Property unless the Student receives permission from the Vice Provost for Student Affairs or their designee. Prior to returning, the Student must contact the Office of Student Conduct to discuss the Student's return to campus. In accordance with University Policy AC 67 Termination of Registration, there may be no financial adjustment made to tuition or fee charges for Students who are Disciplinarily Suspended/Dismissed.

Fines — A monetary Sanction that may be applied to any violation of the *Code*. This fine may be in addition to any restitution owed.

Information Technology Resource Probation — A designated period of time during which a Student's access to University technology is conditioned upon a Student's future behavior. The issuance of additional sanctions may occur if the Student is found to be in Violation of any University technology regulations during the probationary period.

Information Technology Resource Suspension — A temporary loss of part or all of a Student's access to information technology resources for a specified period of time. No refund of any fees charged and applied to information technology resources will be made.

Information Technology Resource Termination — A permanent loss of part or all of a Student's access to information technology resources. No refund of any fees charged and applied to information technology resources will be made.

Involuntary Change of Housing Assignment — A written directive to relocate a resident to an alternative housing accommodation within a specified period of time which is imposed by the Vice Provost for Student Affairs or their designee. Involuntary Change of Housing Assignment is imposed to help ensure the safety and well-being of a member of the University community, to help ensure the Student's own physical or emotional safety or well-being, to protect the security and structure of University Property, or to help ensure that a building/floor has a community environment that is conducive to academic success.

Personal Assistance and Cannabis Education 1: PACE 1 consists of completing an individual meeting and modules. To schedule, please email shsohep@pitt.edu.

Personal Assistance and Cannabis Education 2: PACE 2 consists of completing individual meeting(s). To schedule, please email shsohep@pitt.edu.

No Contact Order — A directive to cease and desist from any intentional contact, direct or indirect, with one or more designated persons or group(s) through any means, including, but not limited to personal contact, e-mail, telephone, texting, social media or any electronic or other means, or through third parties. Should the Student fail to cease contact, the Student will be subject to additional action, up to and including suspension and/or dismissal from the University. Additionally, failure to follow the No Contact Order may result in criminal arrest or the initiation of criminal action. No Contact Orders may be issued outside of the conduct process. In these instances, the No Contact Order would not be considered a Sanction.

Persona Non Grata — An exclusion from a facility or area for a specified period of time or until otherwise notified. During this time, the Student will not be permitted to enter or use the specified University Property for visitation, meals, employment, or any other purpose. This status also includes exclusion from the specified property's lobbies and patios. Should the Student appear in any of the specified areas, the Student

will be subject to arrest. Persona Non Grata may be issued outside of the conduct process. In these instances, the Persona Non Grata would not be considered a Sanction.

Personal Education, Assistance, and Referral Program I (PEAR I) — PEAR I is an alcohol education course that consists of a class session and a one-on-one meeting. To register for PEAR I, please visit: www.studentaffairs.pitt.edu/shs/education/pearclasses/ (using the link under “How to Register for PEAR I”). You can also email shsohep@pitt.edu.

Personal Education, Assistance, and Referral Program II (PEAR II) — PEAR II is an alcohol education course that consists of several one-hour, one-on-one meetings. To schedule PEAR II, please email shsohep@pitt.edu .

Reflection- The Respondent is required to complete a project or activity designed to promote self-reflection on one’s actions and the impact of those actions on others.

Restitution — A written directive to make specific compensation for damaged, destroyed, or misused property of another and/or University.

Suspension of Privileges — A loss of specific privileges for a specified period of time.

Termination of Privileges — A permanent loss of specific privileges.

University Housing Dismissal — A termination from any University owned and/or University contracted housing. Upon the dismissal the Student will be Persona Non Grata from all such housing. This status means the Student will not be permitted to enter or use University owned and/or University contracted housing for visitation, employment, or any other purpose.

University Housing Probation — A designated period of time during which a Student’s residence in University owned housing and/or University contracted housing is conditioned upon future behavior. The issuance of additional sanctions may occur if the Student is found to be in Violation of any University regulation during the probationary period. During the probationary period, a resident may be excluded from participation in extracurricular University owned housing activities and may be excluded from holding any appointed or elected position within the on-campus housing community.

University Housing Suspension — A temporary loss of residence in University-owned housing and/or University contracted housing for a specified period of time. The Student will be Persona Non Grata from all such housing during the period of suspension. This status means the Student will not be permitted to enter or use University owned and/or University contracted housing for visitation, employment, or any other purpose.

Registered Student Organization Sanctions

Alternative Sanction — A mandated Sanction to be created and assigned.

Community Engagement — Registered Student Organizations are required to complete community engagement projects. These projects must involve meaningful collaboration with affected parties or relevant community organizations to restore trust and relationships.

Reprimand — A written and/or oral notice to a Registered Student Organization that its behavior violated the *Student Code of Conduct*.

Educational Programming — An educationally-driven Sanction to be created and assigned by the hearing officer. The Registered Student Organization may be responsible for costs associated with the programming. A program plan must be pre-approved by a designated Student Affairs office

Fines — A monetary Sanction that may be applied to any violation of the *Code*. This fine may be in addition to any restitution owed.

Group Alcohol Awareness Program (GAAP) — A program specifically designed for Registered Student Organizations to increase the awareness of issues with alcohol and other drugs through a presentation and discussions. The program also provides information on resources available for Students who may wish to get support for alcohol or other substance abuse or who may be in recovery. To schedule GAAP please email shsohep@pitt.edu.

Membership Review — The members shall be reviewed by national organization and/or alumni to determine which members may continue their participation. If there is no National organization or alumni associated with the Registered Student Organization, then either the Student Organization Resource Center Office of Fraternity and Sorority Life, or the Office of Student Conduct will determine what individual and/or entity will manage the review.

Mock Social Event — A program designed to assist Registered Student Organizations in hosting a social event that complies with established risk management and social event policies.

Restitution — A written directive to make specific compensation for damaged, destroyed, or misused property of another and/or University.

Restriction of Privileges — A loss of specific privileges for a specified period of time, including, but not limited to:

- a. Receive or retain University funds
- b. Participate in any intercollegiate activities
- c. Participate in any social event
- d. Any activities where alcohol is present
- e. Sponsor any speaker or guest on campus
- f. Educate new members
- g. Sponsor, co-sponsor, and/or participate in recruitment activities
- h. Rent University vehicles
- i. Use University facilities
- j. Solicit and/or sell on campus
- k. Other loss of specified privileges

Risk Management Programming — Functions sponsored by a Registered Student Organization, which educate members of the organization and/or other organizations on successful event planning and management in adherence to University and any relevant national risk management policies. A program plan must be pre-approved.

Social Probation — The loss of privileges to host, sponsor, co-sponsor, and/or participate in any social activities.

Suspension of Registration — A cessation of organizational operations for a specified period of time.

Termination of Registration — Revocation of registration of the Registered Student Organization's status or the chapter's charter as a recognized University fraternity or sorority, with no established date or conditions for reinstatement. The Registered Student Organization/chapter shall cease its operation at the University of Pittsburgh.

Appendix C: Glossary

Adjudication: Completion of any investigative or hearing process and/or any accompanying Appeal process.

Complainant: A University community member who files a referral that alleges a Violation of the *Code*.

Conduct Referral: A report alleging Violations of the *Code*.

Consent: An informed decision made freely and actively by all parties to engage in mutually acceptable sexual activity. Consent is given by clear words or actions. Consent may not be inferred from silence, passivity, or lack of resistance alone. Existence of a current or previous dating, marital, and/or sexual relationship is not sufficient to constitute consent to future or additional sexual activity. Consent to one type of sexual activity does not imply consent to other types of sexual activity. Consent can be withdrawn at any time by any one party.

Someone who is unconscious, asleep, or otherwise mentally or physically incapacitated, whether due to alcohol, drugs, or some other condition, and individuals under the age of sixteen (16), cannot give consent. Consent cannot be obtained by force, intimidation, threat, coercion, isolation, or confinement. Agreement obtained under such conditions does not constitute consent. A person's use of alcohol and/or other drugs does not eliminate responsibility to obtain consent.

Disciplinary Conference: A meeting with a Hearing Officer to discuss an alleged Violation of the *Code* and determine if sufficient information exists to move forward through the conduct process. When sufficient information exists, this conference, which may occur over several meetings, will be used to determine if the Respondent will accept general responsibility and the recommended Sanctions or will proceed to a Level II Hearing.

Full Hearing: A Level II Hearing before the Conduct Hearing Board, to determine whether the Respondent is responsible for violating the *Code* and whether Sanctions should be recommended to the Vice Provost for Student Affairs. For a full description, please refer to Level II Hearing in Chapter 5.

Hearing Officers: Individuals, including but not limited to, Office of Student Conduct staff, Hearing Board members, Student Conduct Peer Review Board members or Residence Life staff who have the authority to adjudicate cases.

Level I Hearing: A meeting with a Hearing Officer to determine responsibility for an alleged Violation of the *Code* where a responsible finding would include sanctions up to and including University Housing Suspension. For a full description of the Level I process, please refer to Chapter 5.

Level II Conduct Hearing Board: The Conduct Hearing Board that is authorized to adjudicate Level II cases. The Level II Conduct Hearing Board may include undergraduate and graduate/professional Students and/or University faculty and staff members. Three members will participate in each Level II hearing. In extraordinary circumstances where the complexity of factual issues and/or matters of law so dictate, the Chancellor may appoint an ad hoc hearing body to hear cases. Any proceeding before such an ad hoc body shall provide due process and ensure the rights of Students.

Level II Conduct Process: A meeting or series of meetings to determine an alleged Violation of the *Code* where a Respondent may receive Sanctions up to and including Disciplinary Dismissal. The process begins with a Disciplinary Conference, but may end in one of the resolutions below:

- A. **Disciplinary Conference**: A meeting with a Hearing Officer to discuss an alleged Violation of the *Code* and determine if sufficient information exists to move forward through the conduct process. When sufficient information exists, this conference, which may occur over several meetings, will be used to determine if the Respondent will accept general responsibility and the recommended Sanctions or will proceed to a Level II Hearing.
- B. **Sanctions-Only Hearing**: A Level II Hearing before the Conduct Hearing Board, in which the Respondent admits general responsibility for the Violations of the *Code* but does not agree to the hearing officer's recommended Sanctions. The Conduct Hearing Board, after considering Respondent's testimony and/or evidence, will recommend Sanctions to the Vice Provost for Student Affairs.
- C. **Full Hearing**: A Level II Hearing before the Conduct Hearing Board, to determine whether the Respondent is responsible for violating the *Code* and whether Sanctions should be recommended to the Vice Provost for Student Affairs.

Respondent: Student/Registered Student Organization alleged to have violated the *Code*.

Sanctions-Only Hearing: A Level II hearing before the Conduct Hearing Board, in which the Respondent admits general responsibility for the Violations of the *Code* but does not agree to the hearing officer's recommended Sanctions. Conduct Hearing Board, after considering Respondent's testimony and/or evidence, will recommend Sanctions to the Vice Provost for Student Affairs. For a full description, please refer to Level II Hearing in Chapter 5.

Student: All individuals taking courses at the University, pursuing undergraduate, graduate, or professional studies, both degree and non-degree seeking, as well as individuals enrolled in non-credit courses and programs. *Code* jurisdiction also includes individuals who have accepted an offer of admission to the University; former Students who withdrew or otherwise left the University whose alleged violations occurred during the time they were Students; and individuals who are on leave of absence from the University, or who are not officially registered and/or enrolled for a particular term but have a continuing relationship with the University.

Student Conduct Peer Review Board (SCPRB): The Student Conduct Peer Review Board (SCPRB) hears cases involving *Code* Violations which will not result in disciplinary suspension or dismissal. The SCPRB is staffed by undergraduate, graduate, and/or part-time Students in good academic standing. The SCPRB may determine responsibility and issue sanctions. The SCPRB will provide due process for Students while protecting the rights of all members of the University community. All SCPRB members will receive appropriate training. No SCPRB member will serve on a panel when they have any direct interest or prior involvement in or knowledge of the incident under consideration, or where the Respondent has identified the member as having a possible bias.

Registered Student Organization: Any student group registered through the University's Student Organization Resource Center (SORC).

University Member: Any individual affiliated with the University of Pittsburgh including but not limited to all full and part-time faculty, staff, students, fellows, and interns on all campuses.

University Property: All property (real, intellectual, and/or personal) owned, leased, controlled, or utilized by the University.

University Review Board (URB): The University Review Board (URB) is the duly authorized appellate body which serves as an advisor to the Provost, or their designee.

Violation: Behavior and/or attempts to engage in behavior inappropriate to the University community for which disciplinary actions may be instituted. This may include Violations of any federal, state, or local law, and/or of any rule, policy, or *Code* provision of the University of Pittsburgh.



The University of Pittsburgh, as an educational institution and as an employer, values equality of opportunity, human dignity, and racial/ethnic and cultural diversity. Accordingly, as fully explained in University Policy CS 07, the University prohibits and will not engage in discrimination or harassment on the basis of race, color, religion, national origin, ancestry, sex, age, marital status, familial status, sexual orientation, gender identity and expression, genetic information, disability, or status as a veteran. The University also prohibits and will not engage in retaliation against any person who makes a claim of discrimination or harassment or who provides information in such an investigation. Further, the University will continue to take affirmative steps to support and advance these values consistent with the University's mission. This policy applies to admissions, employment, access to and treatment in University programs and activities. This is a commitment made by the University and is in accordance with federal, state, and/or local laws and regulations.

For information on University equal opportunity and affirmative action programs, please contact: University of Pittsburgh, Office of Civil Rights and Title IX Compliance (and Title IX, 504 and ADA Coordinator), 31st Floor Cathedral of Learning 4200 Fifth Ave Pittsburgh, PA 15260 (412) 648-7860.

For complete details on the University's Nondiscrimination, Equal Opportunity, and Affirmative Action Policy, please visit www.policy.pitt.edu. For information on how to file a complaint under this policy, please refer to University Procedure CS 07.

Exhibit 18



Free Speech

POLICIES & GUIDELINES

Student Organization Event Planning Guidelines

These guidelines will help student organizations plan events on campus, including inviting speakers. The guidelines will help student organizations:

1. Complete all required Student Organization Resource Center (SORC) documentation prior to the event.
2. Understand University of Pittsburgh policies related to event planning, including security requirements, advertisement of events, and use of University space and facilities.
3. Be familiar with University resources and staff to assist with questions and concerns regarding event planning.

Before the Event

Step 1: Complete the Event Planning Checklist

- **Download the Checklist:** Access the [Event Planning Checklist](#) from the SORC website.
- **Complete the Checklist:** Complete all sections of the checklist, ensuring all required details are provided.
- **Submit the Checklist:** Submit the completed checklist to SORC via email at sorc@pitt.edu or in person at the SORC office (WPU 833).

Step 2: Manage necessary contracts for your event

The [Student Organization Resource Center \(SORC\)](#) offers guidelines and forms for managing event contracts. All contracts and required

documents must be submitted at least 21 days before the event.

- Required forms include W-9/W-8, invoices, liability insurance, and supplier verification.
- Contracts are only considered submitted when signed by all necessary parties.
- Special provisions are available for contract waivers and instructional services.

For more details, visit the [SORC Contracts Page](#).

Step 3: Determine your event funding and participant attendance

How your event is funded may impact requirements for your participant attendance. Undergraduate student organizations: All undergraduate students not solely enrolled in the College of General Studies (CGS) pay an undergraduate Student Activity Fee each semester. This money is allocated to student organizations by the undergraduate Student Government Board (SGB) in accordance with the [SGB Allocations Manual](#). Funding from the Student Activity Fee determines what category of event is being held from one of three categories:

- **Open Event:** An open event is funded in whole or in part by Student Activity Fee funds and must be open to all University of Pittsburgh students who pay the fee (all undergraduate students not solely enrolled in CGS). The host organization, at its discretion, may allow other Pitt community members and the public-at-large to attend an open event. The host organization can opt to offer priority access to students, followed by Pitt faculty and staff, and then the general public.
- **Private Event:** Private events are funded in whole or in part by the Student Activity Fee, but attendance is only open to University of Pittsburgh students.
- **Closed Event:** Closed events are not funded by the Student Activity Fee. The host organization may limit attendance to its own members or any other audience of its choosing, in accordance with the law and University policies and procedures.

Step 4: Evaluate event security needs

The University of Pittsburgh strives to provide a safe environment for its students, faculty, staff, and guests. When planning an event on campus, student organizations must anticipate and consider security needs in advance of the event.

Contact the Office of Involvement and Student Unions (ISU)

- a. Student organizations intending to host an event, including but not limited to inviting a speaker or performer to campus, (hereinafter, the “hosting organization”) must contact ISU@pitt.edu early in the planning process to discuss event security needs. ISU and the University of Pittsburgh Police shall objectively determine whether an event requires security, and, if required, the costs associated with providing such security. These determinations shall be made by evaluating factors, such as but not limited to:
 1. Anticipated audience size
 2. Location of the event
 3. Access level to the event (open to the University community, ticketed, invitation only)
 4. Date and time of the event
 5. Other events taking place on or near campus
 6. Security concerns expressed by the speaker or performer
 7. Security measures specifically requested by the speaker or performer
 8. Any similar viewpoint and content neutral considerations relevant to assessment or campus safety, security, and service
- b. Regardless of any other provision included herein (so long as the hosting organization works with ISU and the University of Pittsburgh Police in advance to permit adequate time for a complete security assessment), if an event meets all the following criteria, the hosting organization will not be assessed any security fees:
 1. The event is only open to the University community (i.e. it is not open to the public-at-large to include individuals not affiliated with the University); and
 2. The hosting organization and/or speaker/performer do not have any specific security requests

- c. The hosting organization(s) is responsible for the security costs assessed in accordance with these Guidelines. The security costs will be used for the payment of University of Pittsburgh Police or other security personnel and for any associated equipment costs or rentals, as required based on the above criteria.
- d. If the hosting organization has any questions regarding the fees assessed, they should contact the Office of the Dean of Students to discuss the rationale for the fee assessment.
- e. The content and viewpoint of the speaker's or performer's message and the community's reaction or expected reaction to the event will not be considered when determining the security fee to be paid by the hosting organization. If the University requires additional security that is beyond that which is assessed above, the University will bear all costs associated with that additional security.

Step 5: Event Promotion

Effectively publicize events using various channels such as social media, email lists, and posters. Clearly communicate the event details, including the purpose, speaker credentials, and any special features, such as networking opportunities or giveaways.

The University encourages hosting organizations to include the following disclaimer in all advertisements related to a speaker event:

"The University of Pittsburgh embraces its role to foster a diverse educational experience for all students through the free expression and exchange of ideas. The use of a University facility for this event does not necessarily constitute an endorsement by the University of any speaker, presentation, content or expressed viewpoint."

- **Post Your Advertisement**

- Posting and Chalking: Refer to the [Posting and Chalking Guidelines for Students and Student Organizations](#) for details and University policies.
- Digital Marketing: Student organizations may submit files for display on digital screens on campus. Refer to [submission](#)

Step 6: Review additional event considerations

- **Event Question & Answer Sessions**

- Invited speaker events should allocate sufficient time for audience members to ask questions. Q&A sessions provide a platform for attendees to engage with the speaker, allowing them to pose relevant, supportive, or challenging questions and debate different viewpoints. To facilitate a productive and respectful dialogue, it is recommended that host organizations carefully plan the Q&A session. Student organizations should choose a suitable format for these sessions, such as:
 - **Open Microphone Forum:** Attendees are invited to ask questions directly using a microphone, allowing for spontaneous interaction.
 - **Facilitator-Managed Questions:** A facilitator moves through the audience with a microphone, selecting individuals to ask questions, which can help manage the flow and tone of the discussion.
 - **Pre-Submitted Questions:** Attendees submit questions in writing before or during the event. These questions are then reviewed and selected by the speaker or moderator, ensuring a curated discussion.

- **Potential for Co-hosting Events with Other Student Organizations**

- Co-hosting events with other student organizations can enhance visibility and attendance, fostering collaboration and resource sharing. This approach not only broadens the event's reach but also enriches the diversity of perspectives and ideas presented.

- **Event Accessibility**

- Student organizations should ensure that their events are accessible to individuals with diverse needs. This includes considering physical accessibility, availability of sign language interpreters, or providing materials in different formats. When using RSVP or registration forms, it is essential to inquire about any required accommodations. For guidance on specific event accommodations, contact [Disability Resources and Services](#).

- **Understanding and Adhering to University policies**

- All registered student organizations must comply with university policies, including the Student Code of Conduct, and relevant federal, state, and local laws when planning and conducting events. Organizations are accountable for the behavior of their members and attendees. Non-compliance may lead to disciplinary action, including potential loss of student organization status and funding.

During the Event

Expression and Dissent: The speaker's right to express viewpoints and the audience's right to listen take precedence. While students are encouraged to maintain an open mind during a speaker's presentation, there may be instances where attendees will not agree with the spoken or displayed viewpoint of the speaker.

For more information on the rights and responsibilities of students and student organizations related to expression and dissent, refer to the [On-Campus Demonstration and Protest Guidelines for Students and Student Organizations](#) and freespeech.pitt.edu.

Assistance and Resources

Many resources are available to assist students and student organizations with planning to ensure a successful event:

Student Organization Resource Center (SORC)	+
Student Government Board (SGB)	+
SGB Allocations Committee	+
Graduate and Professional Student Government (GPSG)	+

Involvement and Student Unions: Student Union Operations +

Involvement and Student Unions: Event Production +

Disability Resources and Services (DRS) +

Pitt Police +

PittEats +

Policies & Guidelines

Policy Summaries

Demonstration & Protest Guidelines

Posting & Chalking Guidelines

Event Planning Guidelines

Suggested Opening for Invited Speaker Events

Employee-Specific Information

Handling Classroom Disruptions

Support for events within 21 days

Student Code of Conduct

The Student Code of Conduct is a set of expectations by which all Pitt students are required to abide.

[Read the Code of Conduct](#) —→



Free Speech

[Rights & Responsibilities](#)

[Policies & Guidelines](#)

[FAQ](#)

[Events](#)

[Support Resources](#)

[Reporting Issues & Asking Questions](#)

RESOURCES

[University Events Calendar](#)

[Pittwire](#)

[Centers & Institutes](#)

[Degree Finder](#)

[Office of the Provost](#)

[Student Affairs](#)

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Pittsburgh, PA 15260

+1 412-624-4141

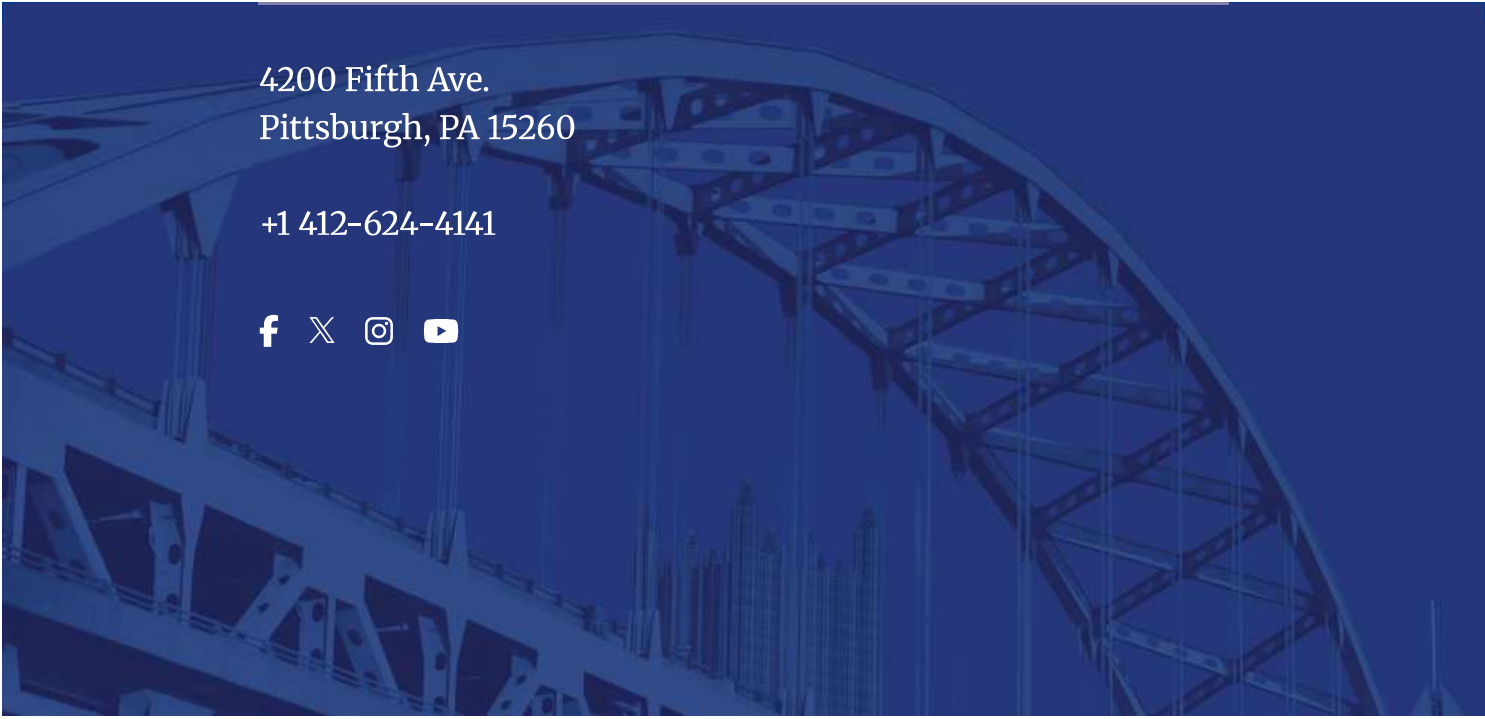


Exhibit 19



Hillman Library sit-in

From Tancheva, Kornelia <TANCHEVA@pitt.edu>

Date Thu 12/12/2024 12:21

To

[REDACTED]

Cc

[REDACTED]

Dear Students for Justice in Palestine Officers,

I am writing to you regarding the study-in going on in Hillman Library that has been promoted by your organization. There have been multiple warnings and requests by Library staff and others to comply with University policy, particularly the Library Space Use Policy.

[Library Space Use Policy | University of Pittsburgh Library System \(https://library.pitt.edu/library-space-use-policy\)](https://library.pitt.edu/library-space-use-policy)

Please note that as of receipt of this email, individuals who violate the library's space use policy, or other University policies, will be referred to Student Conduct. Additionally, I have alerted Student Affairs of these on-going policy violations.

Thank you.

Kornelia

Kornelia Tancheva, Ph.D.
Hillman University Librarian and Director, ULS
241 Hillman Library
3960 Forbes Ave.
Pittsburgh, PA 15260

Tel. 412-648-7705

www.library.pitt.edu

Exhibit 20

[□ MENU](#)

Library Space Use Policy

The Library (which refers to all physical locations in the University Library System) is a space for academic pursuits for the Pitt community and members of the local community, if applicable. The spaces are reserved for academic-related purposes only. Activities not directly related to academics and library services, programs, and expertise are not allowed. These include, but are not limited to various tabling, signage, or posters requests that do not meet the above criteria. In addition, there is absolutely no solicitation of any kind permitted. There are food restrictions clearly posted throughout the Library. Covered beverages and snacks are the only items permitted in the library. No loud noises are allowed. Patrons exhibiting inappropriate behavior will be asked to leave and students will be referred to Student Conduct.

All space use requests that are beyond the normal academic use (study space or the specific function of library spaces) must be approved by Library Administration prior to use. The Library reserves the right to deny any request if the reserving parties do not adhere to the policies and procedures of the library.



The library has publicly bookable spaces available (e.g. Group Study Rooms, the Open Lab, the Text & conText Lab, or the Inclusion & Belonging Place.) If you are interested in reserving those spaces, visit:

- Group Study Rooms: pitt.libcal.com
- Open Lab: library.pitt.edu/open-lab
- Text & conText Lab: creative.pitt.edu/about/group-reservations
- Inclusion & Belonging Place: pi.tt/reserveBP

For further information about booking specific events, see our Events Policy: library.pitt.edu/event-policy



[Give Now](#)

Today's Hours

Hillman Library

- Archives & Special Collections (Hillman)
- Media Services (Equipment & Stark Media)
- Donald S. Wood Service Desk
- Open Lab at Hillman
- Text & conText Lab

12am – 10pm

9am – 4:45pm

9am – 5pm

7am – 10pm

9am – 5pm

9:30am – 6pm

9am – 4:45pm

Archives & Special Collections (Thomas Blvd)

8am – 5pm

Barco Law Library

8:30am – 5pm

Bevier Science & Engineering Library

By Appointment

Center for American Music Library

8:30am – 5pm

Finney Music Library

9am – 5pm

Frick Fine Arts Library

7am – 10pm

Falk Library (HSLs)

8am – 5pm

Bradford Campus: Hanley Library

9am – 5pm

Greensburg Campus: Millstein Library

8am – 5pm

Johnstown Campus: Owen Library

8:30am – 5pm

Titusville Campus: Haskell Library



[More ULS Social Media](#)

[My Library Account](#)

Exhibit 21



January 16, 2025

Students for Justice in Palestine ([REDACTED])
Sent electronically to [REDACTED]

PERSONAL AND CONFIDENTIAL

Regarding Case Number: 2024178201

Dear Students for Justice in Palestine (Presidents: [REDACTED]),

We have reason to believe that your Registered Student Organization may have been involved in an incident or series of incidents that occurred beginning December 9, 2024.

To discuss this matter, please attend a Disciplinary Conference on Wednesday, January 22, 2025 at 12:00pm. Please contact me at 412-648-7910 or studentconduct@pitt.edu to state whether you would prefer an in-person or virtual Disciplinary Conference. If you do not contact me stating your preference within two business days from the date of this letter, you will be scheduled for a virtual Disciplinary Conference.

The purpose of the Disciplinary Conference is to 1) allow the Hearing Officer to discuss the conduct referral, including applicable materials received and the alleged violation(s); 2) make recommended sanction(s), and 3) provide the opportunity to choose how to move forward through the conduct process. Those options are to:

- a. Accept responsibility for violating the Code and accept the recommended sanction(s) and waive the Level II Hearing and Appeal Process.
- b. Accept the general nature of the violation(s) and proceed before the Level II Conduct Hearing Board for a Sanctions-Only Hearing.
- c. Not accept responsibility for the Violation(s) and proceed before the Level II Conduct Hearing Board for a Full Hearing.

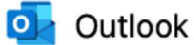
For a detailed description of the Level II process, please review Chapter 5 in the [Student Code of Conduct](#).

The conduct process will move forward regardless of your participation. If you have questions or concerns, please contact me at 412-648-7910 or studentconduct@pitt.edu.

Sincerely,

Matthew Landy
Director of Student Conduct

Exhibit 22



RE: Notice of Options for Resolution

From Landy, Matthew E <mal130@pitt.edu>

Date Sun 1/26/2025 13:16

To [REDACTED]

Cc Player, Shatea <SHP95@pitt.edu>

Good afternoon [REDACTED]

All parties may submit any evidence and witness lists (with a brief explanation of what the witness will testify to) to StudentConduct@pitt.edu due on Tuesday, January 28th, 2025. Once we have reviewed and finalized the evidence and witness lists, we will notify you that you are able to view all evidence from both parties.

Sincerely,

Matthew Landy

Director of Student Conduct

University of Pittsburgh

725 William Pitt Union

Office: 412.648.7910

mal130@pitt.edu

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From: [REDACTED]

Sent: Friday, January 24, 2025 4:51 PM

To: Landy, Matthew E <mal130@pitt.edu>; [REDACTED]

Cc: Player, Shatea <SHP95@pitt.edu>; [REDACTED]

Subject: Re: Notice of Options for Resolution

Dear Matthew Landy,

We find it deeply troubling that you are unable to provide a specific list of policies allegedly violated.

Additionally, our request for any supplementary documentation—beyond the Code of Conduct—detailing procedural information relevant to Level II hearings stems from concerning statements

you made during the disciplinary conference process. Specifically, you characterised the Code of Conduct as outlining only the "broad strokes" of Level II hearings and not the procedures themselves.

This was in response to our inquiry about written documentation supporting your claim that questions must be submitted in advance of the hearing.

We, [REDACTED], having been informed of my rights as Presidents of our organisation, do not admit to the nature of the charge filed against my organization and request a Full Hearing.

Sincerely,
[REDACTED]

From: Landy, Matthew E <mal130@pitt.edu>

Sent: Friday, January 24, 2025 15:56

To: [REDACTED]

Cc: Player, Shatea <SHP95@pitt.edu>

Subject: RE: Notice of Options for Resolution

[REDACTED]

Policy, procedure or guideline' is referring to, for example, the [Library Space Use Policy](#). In a hearing, however, if there is evidence presented that would also be a violation of any other 'policy, procedure or guideline', the Level II Hearing Board may take that into consideration as an infraction. As I explained yesterday, you may review the [Student Code of Conduct](#) regarding the Level II conduct process which outlines topics such as evidence, witnesses, timelines, etc.

Sincerely,

Matthew Landy

Director of Student Conduct

University of Pittsburgh

725 William Pitt Union

Office: 412.648.7910

mal130@pitt.edu

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From: [REDACTED]

Sent: Friday, January 24, 2025 1:58 PM

To: Landy, Matthew E <mal130@pitt.edu>; [REDACTED]

Cc: Player, Shatea <SHP95@pitt.edu>; [REDACTED]

[REDACTED]
Subject: Re: Notice of Options for Resolution

Dear Matthew Landy,

We are concerned by the lack of particulars in your email and the implication this omission may have on the conduct process's provision of "due process and fundamental fairness to all persons."

We request that you provide a **detailed list of the specific policies, procedures, and/or guidelines that are alleged to have been violated**. A general reference to broad categories of violations does not provide sufficient information for us to adequately respond or prepare for the next steps in this process.

Additionally, please furnish us with **any and all supplementary documents** (i.e., outside of the Code of Conduct) detailing procedural information relevant to Level II hearings as mentioned during our meeting on Wednesday.

Sincerely,

[REDACTED]

From: Landy, Matthew E <mal130@pitt.edu>

Sent: Thursday, January 23, 2025 16:27

To: [REDACTED]

Cc: Player, Shatea <SHP95@pitt.edu>

Subject: Notice of Options for Resolution

Dear Students for Justice in Palestine (SJP),

Following your disciplinary conference for the Registered Student Organization Students for Justice in Palestine held on January 22, 2025, please review the options for resolution below.

As a reminder, these are the alleged violations of the Student Code of Conduct and recommended sanctions.

List of Violation(s)

19. Violates or assists in the Violation of any policy, procedure or guideline of the University including, but not limited to the following:

k. Any other policy, procedure, or guideline of the University whether or not listed in the Code

36. Fails without just cause to comply with the lawful direction of a University official, or other lawful authority having just cause and acting in the performance of their duties and authority.

Recommended Sanction(s)

Probation through December 31, 2025 — A designated period of time during which a registered student organization's status is conditioned upon future behavior. The issuance of additional sanctions may occur if the registered student organization is found to be in violation of any University regulation during the probationary period.

Restriction of Privileges — SJP cannot host, co-host or otherwise participate in any events effective immediately. This restriction will be lifted on May 5, 2025, if SJP completes the educational conversations. If SJP does not complete the educational conversations by May 5, 2025, the restriction will remain in place until that sanction is completed.

Educational Conversations — SJP leadership is required to meet with the Associate Director of Student Organizations & Advising to discuss the following topics:

- Process(es) and procedure(s) for scheduling space for events.
- A check list for scheduling space for events.
- The roles and responsibilities of leadership in student organizations.
- Effective leadership strategies in student organizations.
- Community impact that student organizations have.
- Posting and Chalking Guidelines and Demonstration Guidelines.
- Setting and managing expectations as a leader of a registered student organization.

Please respond to this email by 4:00pm Friday January 24, 2025, with one of the below statements.

I, _____, having been informed of my rights as a President of my organization, do hereby waive the right to a hearing, admit to the general nature of the charge filed against my organization, and accept the above-recommended sanctions.

I, _____, having been informed of my rights as a President of my organization, do admit to the general nature of the charge filed against my organization and request a Sanctions Only Hearing to be held on Tuesday, February 4, 2025.

I, _____, having been informed of my rights as a President of my organization, do not admit to the nature of the charge filed against my organization and request a Full Hearing to be held on Tuesday, February 4, 2025.

As always, please reference the [Student Code of Conduct](#) regarding information about the process, violations, etc.

Sincerely,

Matthew Landy

Director of Student Conduct

University of Pittsburgh

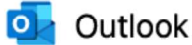
725 William Pitt Union

Office: 412.648.7910

mal130@pitt.edu

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Exhibit 23



Students for Justice In Palestine Level II Hearing

Organizer Player, Shatea <SHP95@pitt.edu>
Meeting time This event occurred 1 month ago (Tue 2/4/2025 13:00 - 17:00)
Location <https://pitt.zoom.us/j/99622010627?from=addon>
My response Not yet responded
Required attendees Player, Shatea, Landy, Matthew E, [REDACTED]
[REDACTED] DaVaughn Vincent-Bryan, Day, David Stephen, [REDACTED]
Optional attendees Mentzer, Jamey
Message sent Fri 1/31/2025 13:28

1 attachment (322 KB)

Level II Student Signature Flow Chart.pdf;

Dear [REDACTED]

Please be advised that your organizations' Level II Hearing will be conducted using ZOOM online remote technology. Be advised that all confidentiality requirements that apply to in-person hearings, apply to the Office of Student Conduct's ZOOM meetings/conferences/hearings. None of the discussion held or materials addressed during these virtual hearings/meetings, should be shared, or copied for any purpose. All notes taken during hearings, may not be shared, and must be shredded or destroyed upon conclusion of the hearing. No member of the Office of Student Conduct, or member of any other University department participating in these meetings/conferences/hearings, consents to being recorded. Additionally, be advised that you may not share an invite to an Office of Student Conduct Zoom session with any other individual – all invites must come directly from Office of Student Conduct staff members. Please discuss with your assigned Office of Student Conduct staff member, any concerns, or questions you may have about including a support person, advisor, witness, or other party in your hearing. **By participating in an Office of Student Conduct remote meeting/hearing, you acknowledge that you have read and agreed to, the above information.**



Hi there,

Player, Shatea is inviting you to a scheduled Zoom meeting.

[Join Zoom Meeting](#)

One tap mobile: US: [+12678310333](tel:+12678310333), [99622010627#](tel:+199622010627) or [8778535247](tel:+18778535247), [99622010627#](tel:+199622010627)
(Toll Free)

Meeting URL: <https://pitt.zoom.us/j/99622010627?from=addon>
Meeting ID: 996 2201 0627
Passcode: 566825

Join by Telephone

For higher quality, dial a number based on your current location.

Dial: +1 267 831 0333 US (Philadelphia)
877 853 5247 US Toll-free

Meeting ID: 996 2201 0627

[International numbers](#)

Cordially,



Shatea Player

Administrative Assistant of Student Conduct
University of Pittsburgh Division of Student Affairs
725 William Pitt Union | shp95@pitt.edu | 412-383-0591

This e-mail is confidential and may well be legally privileged. If you have received it in error, you are on notice of its status. Please notify us immediately by reply e-mail and then delete this message from your system. Please do not copy it or use it for any purposes or disclose its contents to any other person. To do so could violate state and Federal privacy laws. Thank you for your cooperation.

Exhibit 24



Attachments:

[Open Letter Condemning the University of Pittsburgh's Suppression of Pro-Palestinian Voices.pdf](#)

----- Forwarded message -----

From: **SJP at Pitt** <sjppgh@gmail.com>

Date: Tue, Feb 4, 2025 at 9:52 PM

Subject: Open Letter Condemning the University of Pittsburgh's Suppression of Pro-Palestinian Voices

To: <jtag@pitt.edu>, <deanofstudents@pitt.edu>, <carla.panzella@pitt.edu>, <karin.asher@pitt.edu>, <davaughn.vincentbryan@pitt.edu>, Day, David Stephen <dsd55@pitt.edu>, <zachdavis@pitt.edu>, <jtuscano@athletics.pitt.edu>, <cascott@pitt.edu>
Cc: <jtag@pitt.edu>, <diversity@pitt.edu>, <jay.darr@pitt.edu>, <cwp19@pitt.edu>, Day, David Stephen <dsd55@pitt.edu>, <lorraine.craven@pitt.edu>, <karen.sykes@pitt.edu>, <mall130@pitt.edu>, <jmentzer@pitt.edu>, <cjp184@pitt.edu>, <gcn16@pitt.edu>, <kathleen.lamansky@pitt.edu>

We, the undersigned organizations, condemn **the selective repression of Students for Justice in Palestine (SJP)** at the University of Pittsburgh. As the **only Palestinian cultural and advocacy organization on campus**—led by **Palestinian, Arab, and Muslim students**—SJP is being unfairly targeted with **heightened scrutiny and politically driven disciplinary actions**.

In a **blatant act of political suppression**, the University has targeted SJP with proposed sanctions that include **effective suspension** through May 2025, as well as probation through December 2025. Meanwhile, multiple registered pro-Israel advocacy organizations continue to operate without interference, **despite consistent harassment of SJP and its members**. One of these organizations, Students Supporting Israel, has repeatedly collaborated with **Betar USA**—an organization unaffiliated with the university that **issued bomb threats against SJP's general body** in November 2024. By **failing to take action in response to these threats**, the university has **effectively emboldened Betar**; the group has since provided the Trump administration with a list of international students, **targeting them for deportation due to their alleged pro-Palestine stance**.

From the time SJP leadership first met with Student Conduct staff on January 22, they were given **just six days to submit their evidence and witnesses**, despite the university having built its case against them **for over a month and a half**. Student Conduct staff also demanded that SJP leadership **submit in advance all questions they planned to ask during the hearing**, a directive that was later **retracted** upon questioning by SJP representatives—raising serious concerns about the fairness and transparency of the disciplinary process.

This latest act of repression is only the latest in a wave of disciplinary measures taken by University of Pittsburgh administration, including **surveilling, defunding, and relocating** SJP events—all justified by vague and inconsistently applied policies. These actions not only **disproportionately penalize students of color** for speaking out against apartheid and state violence but also set a dangerous precedent that will **erode the free speech and organizational rights of all Pitt affiliates**.

In light of the university administration's blatant attempt to silence pro-Palestine voices, we demand:

1.

The complete dismissal of all disciplinary proceedings against SJP.

2.

Transparency in university conduct policies and equitable application of these policies.

3.

An end to the University's suppression of Palestinian advocacy on campus.

We refuse to allow this university to **silence marginalized voices**. Advocacy for the rights of the Palestinian people is **not** a crime.

Signed,

University of Pittsburgh Affiliated Organizations:

1.

Students for Justice in Palestine

2.

Faculty and Staff for Justice in Palestine

3.

University of Pittsburgh School of Law

4.

Muslim Student Association (MSA)

5.

Jewish Students' Bund

6.

Middle Eastern and North African Student Association (MENASA) at Pitt

7.

Asian Student Alliance (ASA)

8.

Rainbow Alliance

9. Women of Color Collective (WOCC)
10. Latinx Student Association (LSA)
11. Kya Baat Hai
12. The Fann Club
13. Luso-Brazilian Student Association
14. Alliance of Queer Underrepresented Asians in Recognition of Intersectionality to Uphold Solidarity (AQUARIUS)
15. Japanese Student Association (JSA)
16. PRISM at Pitt
17. Trans Action Building
18. Progressive Students for Change at Pitt
19. Student Disability Coalition
20. Autistic Students Union at Pitt
21. Humanity First at Pitt
22. ACLU Club at Pitt
23. Direct Action Coalition (DAC)

24.
Pittsburgh Policy Initiative

25.
Behavioral Economics Club

26.
The Letter Project at Pitt

27.
COVID Safe Panthers

28.
Pitt Divest From Apartheid

Community Organizations:

1.

Council on American Islamic Relations - Philadelphia

2.

Pittsburgh Palestine Coalition

3.

Harrisburg Palestine Coalition

4.

Islamic Center of Pittsburgh

5.

Jewish Voice for Peace - Pittsburgh

6.

Ratzon: Center for Healing & Resistance

7.

BDS Pittsburgh

8.

Black Socialist Formation

9.

New Afrikan Independence Party (NAIP)

10.

Asian Pacific Islander Political Alliance

11. Alliance of South Asian Progressives in Pittsburgh (ASAPP)
12. Rangoli Pittsburgh
13. Pittsburgh Arab Music Ensemble
14. Karavansarai
15. Carnegie Mellon College Progressives
16. Middle Eastern and North African Student Association at **CMU**
17. Rojava Solidarity Committee
18. Veterans For Peace, Pittsburgh Chapter 047
19. UE Local 667
20. UE Local 690
21. Healthcare Workers for Palestine - Pittsburgh Chapter
22. Western PA Coalition for Single Payer Healthcare
23. Tri-state Abortion Action
24. Sunrise Movement Pittsburgh
25. Steel City Anti-Fascist League
- 26.

Our Streets Collective

27.

Against Carceral Tech

28.

Mask Up Pittsburgh

29.

Howmet Accountability Project

30.

Pittsburgh Palestine Solidarity Committee

31.

Friends of Sabeel North America (FOSNA) - Pittsburgh

32.

Southwestern PA Women's Coalition

33.

Take Action Mon Valley

34.

Stay Gold Books

35.

Valley View Church

36.

Green Party of Allegheny County

37.

Pittsburgh Green New Deal

38.

Project for Responsive Democracy

39.

Pittsburgh Branch of Communist Party USA

40.

Pittsburgh Branch of Democratic Socialists of America

41.

Pittsburgh Branch of the Party for Socialism & Liberation

42. ANSWER Coalition Pittsburgh
43. West Virginia University Muslim Students' Association
44. River Valley for Gaza Healthcare
45. Wayne State University Faculty and Staff for Justice in Palestine
46. SCAD Students for Justice in Palestine

Exhibit 25



Conduct Hearing Update

From Nabors, Marlin U. <MarlinNabors@pitt.edu>

Date Tue 3/18/2025 09:16

To [REDACTED]

Dear Officers of Students for Justice in Palestine at Pitt,

This notification is to provide you with important information regarding the status of the above-referenced student conduct proceeding.

I have received information that while this conduct proceeding was ongoing, you engaged in additional conduct that may have violated the Student Code of Conduct (the "Code"). Specifically, that among other things, you improperly engaged in communications to members of the Conduct Hearing Board during their deliberations following the February 4, 2025 Level II Conduct Hearing. As set forth in the Code, interference with the conduct process, which includes any action designed or with the potential to influence or intimidate any person who is participating in a student conduct proceeding, constitutes a serious violation. Your recent actions accordingly give rise to a number of significant consequences.

First, Student Conduct will consider additional conduct charges pertaining to these actions or any other actions in violation of the Code that come to light in the course of its investigation. Second, due to the serious nature of these cumulative actions, you will separately be receiving a Notice of Interim Suspension. That Notice will provide information regarding the nature, duration and scope of that interim suspension, as well as any appeal rights. Third, these actions also irreparably compromise the integrity and credibility of the current conduct proceeding. The integrity of the student conduct process is paramount to ensuring fairness within our student community. Under the circumstances presented here, the integrity of the process dictates that the current Conduct Hearing Board be dismissed and released from further deliberation without decision, and that the entire proceeding be vacated as null and void.

To ensure a fair and impartial process for all, this case and associated charges will be remanded to the Office of Student Conduct to be re-initiated from the beginning as a new proceeding, starting again with the Level II Pre-Hearing Process, and following the procedures outlined in the Code. The new case may include additional or different charges, as deemed appropriate. In the event the new case goes to the hearing stage, a different hearing moderator will be appointed, and a different conduct hearing board will be convened. The Office of Student Conduct will contact you in due course to discuss next steps.

Finally, you are reminded that any action by you or on behalf of your organization which is designed to or may reasonably be construed as an attempt to intimidate, coerce, influence, disrupt or interfere with a conduct process or any person involved in a conduct process (*e.g.* parties, potential witnesses, the hearing moderator, members of the conduct hearing board or other hearing officers, etc.) may constitute a Code violation, which could result in additional charges and/or necessitate additional corrective action to protect the integrity of the process. Such conduct includes, but is not limited to, communications made outside of the context of the conduct process that are directed to a person involved in the conduct process, or threats made against such persons due to their participation in the conduct process.

Sincerely,

Dean Marlin Nabors



Marlin Nabors (he,him,his)

Associate Vice Provost and
Dean of Students
University of Pittsburgh
deanofstudents@pitt.edu
412-648-1006

Exhibit 26



March 18, 2025

Students for Justice in Palest ([REDACTED])

Sent electronically to [REDACTED]

PERSONAL AND CONFIDENTIAL

Regarding Case Number: 2024178201

Dear Officers of Students for Justice in Palestine at Pitt,

We have received information that individuals acting on behalf of Students for Justice in Palestine at Pitt (SJP) engaged in conduct that may have violated the Student Code of Conduct.

Specifically, that among other things, you improperly engaged in communications to members of the Conduct Hearing Board during their deliberations following your February 4, 2025, Level II Conduct Hearing.

As set forth in the Code, interference with the conduct process, which includes any action designed or with the potential to influence or intimidate any person who is participating in a student conduct proceeding, constitutes a serious violation.

Based on this information SJP is being placed on an **Interim Suspension of Registration** from the University of Pittsburgh, effective immediately. Interim Suspension of Registration: A cessation of organizational operations or use of university resources to advance the mission of the organization. This includes but is not limited to, requesting event space, requesting funds, facilitating any events or hosting anything that be construed as an event, including co-sponsorship.

Please be advised that SJP has ten (10) business days from the date of this letter to appeal this interim action by requesting that the Vice Provost for Student Affairs or their designee reconsider this interim action. To begin this process, please follow this link:

https://cm.maxient.com/reportingform.php?UnivofPitt&layout_id=6

The Vice Provost for Student Affairs or their designee will consider the request and advise you of the outcome of that review within five (5) business days of the submission of the request. SJP will remain on Interim Suspension of Registration during the review process. Please call the Office of Student Conduct at 412-648-7910 if you have additional questions or concerns.

Sincerely,



Jamey Mentzer
Associate Director of Student Conduct

CC:

[REDACTED]
[REDACTED]

Karin Asher, Associate Dean for Student Engagement and Professional Development
Ted Fritz, Department of Public Safety
Matthew Landy, Director of Student Conduct
Marlin Nabors, Associate Vice Provost and Dean of Students
Stan O'Loughlin, Office of University Counsel
Carla Panzella, Vice Provost for Student Affairs

Exhibit 27



March 19, 2025

Students for Justice in Palestine ([REDACTED])
Sent electronically to [REDACTED]

PERSONAL AND CONFIDENTIAL

Regarding Case Number: 2024178201

Dear Students for Justice in Palestine,

We have been made aware that after the interim suspension of registration was already in place, SJP actively posted, advertised and promoted specific gatherings or protests on their social media.

This is a violation of the interim suspension of registration in which you were instructed to cease operations including co-sponsorships.

This new information may result in additional charges. You're required to follow the mandate of the interim suspension and avoid behaviors that conflict with those expectations.

Sincerely,

Jamey Mentzer
Associate Director of Student Conduct

CC: [REDACTED]
[REDACTED]

Exhibit 28

← Posts

🇸🇮🇵 Liked by pittapartheiddivest and others

sjp_pitt Shiver me timbers 🤡🤡🍷

December 10, 2024

🇸🇮🇵 and 4 others
Pittsburgh, Pennsylvania

PGH - EMERGENCY PROTEST 1/2



📖 463 💬 8 📍 184 📌

🇸🇮🇵 Liked by pittapartheiddivest and others

Anti embargo now! Down with the genocidal US-Israel... more
2 days ago

🇸🇮🇵 sjp_pitt and 5 others

← Posts

🇮🇹 Liked by pittapartheiddivest and others

sjp_pitt Shiver me timbers 🤡🤡🍷

December 10, 2024

 and 4 others
Pittsburgh, Pennsylvania



❤️ 463 💬 8 📌 184



🇮🇹 Liked by pittapartheiddivest and others

Arm embargo now! Down with the genocidal US-Israel... more
2 days ago

 sjp_pitt and 5 others



Exhibit 29

March 21, 2025

Via email to chancellor@pitt.edu

Joan T. A. Gabel
Chancellor of the University of Pittsburgh
4200 Fifth Avenue
Pittsburgh, PA 15260

Re: University of Pittsburgh’s Unconstitutional Censorship of SJP

Dear Chancellor Gabel:



Eastern Region Office
PO Box 60173
Philadelphia, PA 19102
215-592-1513 T
267-573-3054 F

Central Region Office
PO Box 11761
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Pittsburgh, PA 15222
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412-345-1255 F

The American Civil Liberties Union of Pennsylvania (“ACLU-PA”) represents the University of Pittsburgh’s Students for Justice in Palestine (“SJP”) chapter. Beginning in December 2024, the University of Pittsburgh (“University”) has singled out SJP for disciplinary proceedings related to peaceful, non-disruptive conduct exhibited by other student organizations without any University sanctions, retaliated against SJP for engaging in constitutionally-protected political speech, and threatened to impose further sanctions against group members for political advocacy that is independent of University sponsorship.

We write to respectfully request that the University immediately rescind both its March 18 decision to suspend SJP’s student group registration and its March 19 threat of additional disciplinary sanctions for continuing to engage in constitutionally protected political speech unrelated to formal organizational recognition. We ask you to please advise us by noon on Monday, March 24, that you will take necessary measures to stop the ongoing irreparable harm caused by the University’s treatment of our clients.

I. Background

The University first sought to discipline SJP after members of the student organization participated in an overnight “study in” at the Hillman Library, beginning on December 9, 2024. The students gathered with keffiyehs and flags to express solidarity with the Palestinian people while studying for finals. Other university-sponsored student organizations, notably sororities and fraternities, conduct similar study sessions, including one overlapping with SJP’s, in which they display organizational messages. SJP students did not chant, picket, block passage, or disrupt library operations. The students came to study, and while doing so quietly and respectfully displayed clothing and other symbols reflecting their deeply held political beliefs about an important and high-profile foreign conflict.

At no time did SJP students disrupt library operations or interfere with fellow students' access to the library or study environment.¹

On January 16, 2025, SJP received a letter from the University advising it to attend a disciplinary conference related to the “study in.” The notice did not specify any student conduct rule allegedly violated by the students. SJP’s co-presidents participated in two disciplinary conferences on January 22, 2025, and January 23, 2025, during which the University recommended placing SJP on probation through the end of the calendar year, restricting SJP’s privileges to host, co-host, or otherwise participate in any events until May 5, 2025, and requiring SJP leadership to complete educational conversations with University staff. SJP instead opted to attend a Level II Conduct Hearing on February 4, 2025, to contest the alleged misconduct and proposed sanctions. To date, the University has not released the Conduct Board’s findings and recommendation.

On the evening of the conduct hearing, SJP published an Open Letter criticizing the University’s actions during the preceding months to suppress the group’s political speech and advocacy, and the University’s lack of transparency throughout the disciplinary process.² SJP—joined by 27 other University-affiliated organizations and 46 other community groups—sent that Open Letter to University leadership, including officials sufficiently involved in student conduct matters to exercise the power necessary to meet the organizations’ requests. The letter requested dismissal of the disciplinary proceedings, improved transparency in University conduct policies, equitable application of the policies, and an “[e]nd to the University’s suppression of Palestinian advocacy on campus.”

On March 18, 2025, the University sent SJP a second letter advising that it was immediately placing SJP on interim suspension of registration for “improperly engag[ing] in communications to members of the Conduct Hearing Board during their deliberations.” The notice did not identify the communications at issue, but presumably it refers to the Open Letter. The University’s letter directed a “cessation” of SJP’s “organizational operations or use of university resources to advance the mission of the organization. This includes but is not limited to, requesting event space, requesting funds, facilitating any events or hosting anything that [sic] be construed as an event, including co-sponsorship.” The letter gave SJP ten days to appeal the decision.

Meanwhile, on March 19, 2025, SJP leadership continued to further the organization’s mission outside of its affiliation with the University by promoting an off-campus community event scheduled to take place on March 22, 2025.³ That same day, the University sent a third letter to SJP stating that its social media posts were a “violation of the interim suspension of registration in which [SJP was] instructed to cease operations including co-sponsorships,” and threatening that the conduct “may result in additional charges.” The offending conduct identified by the letter was that SJP had “actively posted, advertised and promoted specific gatherings or

¹ A University professor subsequently testified to the lack of disruption during the conduct hearing on February 4, 2025. The professor also noted that SJP members were repeatedly harassed by library staff and Student Affairs staff but uncomplainingly complied with their requests.

² The Open Letter is attached as Exhibit 1.

³ Screenshots of these promotional social media posts are attached as Exhibit 2.

protests on their social media.” The March 22 event is sponsored by numerous non-University organizations and scheduled to occur in a traditional public forum, Schenley Plaza, located near the University but not on University property.

II. Legal Analysis

Public colleges and universities are bound by the First Amendment.⁴ Supreme Court precedent “leave[s] no room for the view that, because of the acknowledged need for order, First Amendment protections should apply with less force on college campuses than in the community at large. Quite to the contrary, the vigilant protection of constitutional freedoms is nowhere more vital than in the community of American schools.”⁵ The University has violated SJP’s, and its members’, First Amendment rights in at least three ways: (1) selectively initiating disciplinary proceedings over SJP’s silent, non-disruptive expression of political views during a final-exam-period library study session; (2) retaliating against SJP for criticizing the University by imposing an interim suspension that directs a “cessation of organizational operations”; and (3) impermissibly directing SJP to cease expressive, off-campus activities, even though unrelated to formal university club sponsorship, by threatening further unspecified disciplinary action.

A. Selective Prosecution of Non-disruptive Expressive Activity

The University has treated SJP differently than other student organizations solely because of its viewpoint by seeking to discipline SJP for hosting a non-disruptive group study session in the Hillman Library. Other student groups, such as fraternity and sorority organizations, also conduct similar group study sessions in the library during finals periods and identify themselves by displaying Greek letters on whiteboards or other property. Such non-disruptive, symbolic political expression has long been accorded First Amendment protection, even in secondary schools where students enjoy less protection than in universities.⁶ But only SJP has faced disciplinary charges as a result of such conduct.⁷

As a public institution, the University “may not discriminate against speech based on the ideas or opinions it conveys.”⁸ Speech protections under the First Amendment extend to expressive conduct—such as a display of keffiyehs and flags—that intends to convey a message that is likely to be understood by those who view it.⁹ That other students might object to that message is not a legitimate reason to ban, discipline, or discriminate against those who non-

⁴ *Healy v. James*, 408 U.S. 169, 192–93 (1972); *DeJohn v. Temple Univ.*, 537 F.3d 301, 314 (3d Cir.2008) (accord); see also *Krynicky v. Univ. of Pittsburgh*, 742 F.2d 94, 103 (3d Cir. 1984) (specifically holding that the University of Pittsburgh is subject to First Amendment claims brought under 42 U.S.C. § 1983).

⁵ *Healy*, 408 U.S. at 180 (internal quotations omitted).

⁶ See, e.g., *Tinker v. Des Moines Indep. Cmty. Sch. Dist.*, 393 U.S. 503 (1969).

⁷ At the February 2025 conduct hearing, a University professor testified that she has witnessed such gatherings by other student groups, but had never before witnessed them be harassed by staff, let alone armed police officers, as SJP was in December 2024.

⁸ *Iancu v. Brunetti*, 588 U.S. 388, 393 (2019) (citing *Rosenberger v. Rector and Visitors of Univ. of Va.*, 515 U.S. 819, 829–830 (1995)) (explaining that viewpoint discrimination is an “egregious form of content discrimination” and is “presumptively unconstitutional”).

⁹ *Spence v. Wash.*, 418 U.S. 405, 405 (1974); see also *Tinker*, 393 U.S. at 505-06 (extending First Amendment protections to students’ wearing of armbands to protest the Vietnam War).

disruptively convey the message. Selective enforcement of University policies based on hostility to a student group’s speech constitutes viewpoint discrimination,¹⁰ which is “impermissible in any forum.”¹¹ Therefore, the University’s decision to selectively initiate disciplinary proceedings against SJP for non-disruptive expressive conduct engaged in by other student groups violates SJP’s First Amendment rights.¹²

B. Retaliation Against SJP for Engaging in Protected Political Speech

The Open Letter signed by 74 organizations, which SJP publicized and sent to University officials, constitutes core political speech protected by the First Amendment.¹³ The University’s decision to place SJP on interim suspension in response to the Open Letter amounts to unconstitutional retaliation because (1) SJP’s message constitutes protected criticism of government action,¹⁴ (2) the disciplinary action would deter other student groups “of ordinary firmness” from engaging in similar advocacy, and (3) the University imposed the interim suspension based on SJP’s speech.¹⁵ The fact that the Open Letter discussed an ongoing quasi-judicial proceeding does not insulate the University’s response from First Amendment scrutiny.¹⁶ The deterrent effect of this action is not hypothetical: SJP board members belong to other student organizations that are reconsidering the risks of promoting their missions through University-affiliated events. And the University’s letter expressly admitted that SJP’s speech caused the disciplinary action by stating that “[b]ased on” information that SJP “improperly engaged in communications to members of the Conduct Hearing Board during their deliberations,” it was being placed on interim suspension. There is no allegation in the letter that the communications were coercive, threatening, or in any other way exceeded the bounds of legitimate First Amendment expression about a matter of public concern.

¹⁰ *Bus. Leaders In Christ v. Univ. of Iowa*, 991 F.3d 969, 985–86 (8th Cir. 2021) (selective enforcement of facially neutral non-discrimination policy against student group based on its religious views violated its free speech rights); *Christian Legal Soc’y v. Walker*, 453 F.3d 853, 866 (7th Cir. 2006) (same); *Frederick Douglass Found., Inc. v. District of Columbia*, 82 F.4th 1122, 1142 (D.C. Cir. 2023) (“Neutral regulations may reasonably limit the time, place, and manner of speech, but . . . cannot be enforced based on the content or viewpoint of speech.”).

¹¹ *Ne. Pa. Freethought Soc’y v. Cnty. of Lackawanna Transit Sys.*, 938 F.3d 424, 436 (3d Cir. 2019); *see also Rosenberger*, 515 U.S. at 830; *Mazo v. New Jersey Sec’y of State*, 54 F.4th 124, 149 (3d Cir. 2022) (“Because regulation of particular views is especially offensive to the First Amendment, viewpoint discrimination is generally not permitted under any circumstances.”).

¹² *See Smith v. Tarrant County College Dist.*, 694 F. Supp. 2d 610, 629 (N.D. Tex. 2010) (explaining that school officials cannot restrict speech on mere speculation that students’ expressive activities will cause disruption).

¹³ *See Pickering v. Bd. of Educ.*, 391 U.S. 563, 573 (1968) (“The public interest in having free and unhindered debate on matters of public importance—the core value of the Free Speech Clause of the First Amendment—is [] great”); *McCutcheon v. Fed. Elec. Comm’n*, 572 U.S. 185, 203 (2014) (“The First Amendment safeguards an individual’s right to participate in the public debate through political expression and political association.”).

¹⁴ *See Munroe v. Cent. Bucks Sch. Dist.*, 805 F.3d 454, 473 (3d Cir. 2015) (“[S]peech involving government impropriety occupies the highest rung of First Amendment protection”).

¹⁵ *Palardy v. Twp. of Millburn*, 906 F.3d 76, 80–81 (3d Cir. 2018) (describing retaliation test).

¹⁶ *See Bridges v. California*, 314 U.S. 252, 270 (1941) (explaining that “shielding judges from published criticism” cannot justify “an enforced silence, however limited”); *Landmark Communications v. Va.*, 435 U.S. 829, 841 (1978) (noting that speech about ongoing judicial proceedings cannot be restricted without proof of “a clear and present danger to the administration of justice”); *In re Kendall*, 712 F.3d 814, 825 (3d Cir. 2013) (same).

As discussed below, the suspension is causing SJP irreparable harm by preventing the group and its members from engaging in constitutionally protected, on-campus political expression.

C. Impermissible Regulation of SJP's Off-Campus Speech

The University's March 19 letter threatened to sanction SJP for off-campus speech beyond the scope of the University's regulatory authority, in patent violation of the First Amendment. In *Mahanoy Area Sch. Dist. v. B.L.*, a case handled by our organization, the Supreme Court held that schools have little leeway to regulate off-campus speech, noting that "courts must be more skeptical of a school's efforts to regulate off-campus speech, for doing so may mean the student cannot engage in that kind of speech at all."¹⁷ The Court noted that, in cases involving "political or religious speech that occurs outside school . . . , the school will have a heavy burden to justify intervention."¹⁸ Moreover, "[p]ublic universities have significantly less leeway in regulating student speech than public elementary or high schools."¹⁹

SJP's expression of support for an off-campus event on Saturday, March 22, is well beyond the University's regulatory authority. Regardless of whether SJP is under interim suspension or can benefit from formal organizational recognition, both the organization and its members still maintain free speech rights on campus and, even more so, off campus. Their ongoing political advocacy enjoys maximal First Amendment protection and is completely separate from any benefits conferred by University student club registration. The University's attempt to stifle SJP's core political speech by threatening further disciplinary conduct has already had a profound chilling effect.²⁰ For example, SJP has silenced its social media presence and is refraining from sharing information about upcoming community events promoting cultural awareness and solidarity with the Palestinian people. The University's threatened disciplinary action, intended to censor SJP's free-speech rights, is an egregious violation of the First Amendment.

III. Conclusion

The University's actions, as outlined above, are causing ongoing irreparable harm to SJP and its members' First Amendment right to engage in core political expression.²¹ **As SJP's lawyers, we are advising our clients that they may immediately resume their political advocacy, on social media and in off-campus events, such as the March 22 demonstration in Schenley Plaza.** Formal university recognition simply gives student organizations access to

¹⁷ 594 U.S. 180, 189 (2021).

¹⁸ *Id.* The University cannot even assert an interest in prohibiting students from using vulgar language to criticize members of the school community, as the school district did in *B.L.*, since SJP merely promoted an event unrelated to the University using respectful language.

¹⁹ *McCauley v. Univ. of the Virgin Islands*, 618 F.3d 232, 47 (3d Cir. 2010).

²⁰ *See Speech First, Inc. v. Sands*, 144 S. Ct. 675, 676 (2024) (recognizing that constitutional violations "arise from the deterrent, or 'chilling,' effect of governmental regulations" because "'the threat of invoking legal sanctions and other means of coercion, persuasion, and intimidation' may cause self-censorship in violation of the First Amendment just as acutely as a direct bar on speech.").

²¹ *Elrod v. Burns*, 427 U.S. 347, 373-74 (1976) ("The loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury.").

University programs and benefits; it does not empower the University to curtail the organization's or its members' constitutional rights, especially off campus. Any further retaliatory action, or threatened action, by the University against SJP or its student members for such constitutionally protected expressive activities will be met with immediate litigation.

Beyond the threatened disciplinary action in the March 19 letter, the University's interim suspension of group status is causing additional irreparable harm. SJP is scheduled to host a long-planned artistic demonstration on April 3-4 on the Student Union lawn, which the University had previously authorized and funded. On April 5, it is scheduled to co-host a panel discussion. Absent reversal of the interim suspension, both constitutionally protected events are in jeopardy.

Please notify us by noon on Monday, March 24, 2025, that the University has lifted SJP's interim suspension and withdrawn the March 19 threat of further disciplinary action for engaging in constitutionally protected expression. If we do not hear from you by the appointed time, we will construe your silence as a refusal of this request. Failure to rescind the interim suspension and threat of additional disciplinary action will result in an application for emergency relief to the U.S. District Court. If you have any questions or would like to discuss our request, please contact Witold Walczak at [REDACTED] or [REDACTED]. We look forward to hearing from you.

Respectfully,



Witold J. Walczak
Legal Director
American Civil Liberties Union of
Pennsylvania
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Staff Attorney
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Provost and Senior Vice Chancellor, provost@pitt.edu

Geovette E. Washington,
Senior Vice Chancellor and Chief Legal Officer, svccllo@pitt.edu

J. Nicole Rhodes,
Associate Legal Counsel, nrhodes@pitt.edu

Exhibit 1

Open Letter Condemning the University of Pittsburgh's Suppression of Pro-Palestinian Voices

We, the undersigned organizations, condemn **the selective repression of Students for Justice in Palestine (SJP)** at the University of Pittsburgh. As the **only Palestinian cultural and advocacy organization on campus**—led by **Palestinian, Arab, and Muslim students**—SJP is being unfairly targeted with **heightened scrutiny and politically driven disciplinary actions**.

In a **blatant act of political suppression**, the University has targeted SJP with proposed sanctions that include **effective suspension** through May 2025, as well as probation through December 2025. Meanwhile, multiple registered pro-Israel advocacy organizations continue to operate without interference, **despite consistent harassment of SJP and its members**. One of these organizations, Students Supporting Israel, has repeatedly collaborated with **Betar USA**—an organization unaffiliated with the university that **issued bomb threats against SJP's general body** in November 2024. By **failing to take action in response to these threats**, the university has **effectively emboldened Betar**; the group has since provided the Trump administration with a list of international students, **targeting them for deportation due to their alleged pro-Palestine stance**.

From the time SJP leadership first met with Student Conduct staff on January 22, they were given **just six days to submit their evidence and witnesses**, despite the university having built its case against them **for a month and a half**. Student Conduct staff also demanded that SJP leadership **submit in advance all questions they planned to ask during the hearing**, a directive that was later **retracted** upon questioning by SJP representatives—raising serious concerns about the fairness and transparency of the disciplinary process.

This latest act of repression is only the latest in a wave of disciplinary measures taken by University of Pittsburgh administration, including **surveilling, defunding, and relocating SJP events**—all justified by vague and inconsistently applied policies. These actions not only **disproportionately penalize students of color** for speaking out against apartheid and state violence but also set a dangerous precedent that will **erode the free speech and organizational rights of all Pitt affiliates**.

In light of the university administration's blatant attempt to silence pro-Palestine voices, we demand:

1. **The complete dismissal of all disciplinary proceedings against SJP.**
2. **Transparency in university conduct policies and equitable application of these policies.**
3. **An end to the University's suppression of Palestinian advocacy on campus.**

We refuse to allow this university to **silence marginalized voices**. Advocacy for the rights of the Palestinian people is **not** a crime.

Signed,

University of Pittsburgh Affiliated Organizations	Community Organizations
<ol style="list-style-type: none"> 1. Students for Justice in Palestine 2. Faculty and Staff for Justice in Palestine 3. University of Pittsburgh School of Law 4. Muslim Student Association (MSA) 5. Jewish Students' Bund 6. Middle Eastern and North African Student Association (MENASA) at Pitt 7. Asian Student Alliance (ASA) 8. Rainbow Alliance 9. Women of Color Collective (WOCC) 10. Latinx Student Association (LSA) 11. Kya Baat Hai 12. The Fann Club 13. Luso-Brazilian Student Association 14. Alliance of Queer Underrepresented Asians in Recognition of Intersectionality to Uphold Solidarity (AQUARIUS) 15. Japanese Student Association (JSA) 16. PRISM at Pitt 17. Trans Action Building 18. Progressive Students for Change at Pitt 19. Student Disability Coalition 20. Autistic Students Union at Pitt 21. Humanity First at Pitt 22. ACLU Club at Pitt 23. Direct Action Coalition (DAC) 24. Pittsburgh Policy Initiative 25. Behavioral Economics Club 26. The Letter Project at Pitt 27. COVID Safe Panthers 28. Pitt Divest From Apartheid 	<ol style="list-style-type: none"> 29. Council on American Islamic Relations - Philadelphia 30. Pittsburgh Palestine Coalition 31. Harrisburg Palestine Coalition 32. Islamic Center of Pittsburgh 33. Jewish Voice for Peace - Pittsburgh 34. Ratzon: Center for Healing & Resistance 35. BDS Pittsburgh 36. Black Socialist Formation 37. New Afrikan Independence Party (NAIP) 38. Asian Pacific Islander Political Alliance 39. Alliance of South Asian Progressives in Pittsburgh (ASAPP) 40. Rangoli Pittsburgh 41. Pittsburgh Arab Music Ensemble 42. Karavansarai 43. Carnegie Mellon College Progressives 44. Middle Eastern and North African Student Association at CMU 45. Rojava Solidarity Committee 46. Veterans For Peace, Pittsburgh Chapter 047 47. UE Local 667 48. UE Local 690 49. Healthcare Workers for Palestine - Pittsburgh Chapter 50. Western PA Coalition for Single Payer Healthcare 51. Tri-state Abortion Action 52. Sunrise Movement Pittsburgh 53. Steel City Anti-Fascist League 54. Our Streets Collective 55. Against Carceral Tech 56. Mask Up Pittsburgh 57. Howmet Accountability Project 58. Pittsburgh Palestine Solidarity Committee 59. Friends of Sabeel North America (FOSNA) - Pittsburgh 60. Southwestern PA Women's Coalition 61. Take Action Mon Valley 62. Stay Gold Books

- | | |
|--|--|
| | <ol style="list-style-type: none">63. Valley View Church64. Green Party of Allegheny County65. Pittsburgh Green New Deal66. Project for Responsive Democracy67. Pittsburgh Branch of Communist Party USA68. Pittsburgh Branch of Democratic Socialists of America69. Pittsburgh Branch of the Party for Socialism & Liberation70. ANSWER Coalition Pittsburgh71. West Virginia University Muslim Students' Association72. River Valley for Gaza Healthcare73. Wayne State University Faculty and Staff for Justice in Palestine74. SCAD Students for Justice in Palestine |
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Exhibit 2

← Posts

🇸🇮🇵 Liked by pittapartheiddivest and others

sjp_pitt Shiver me timbers 🤡🤡🍷

December 10, 2024

🇸🇮🇵 and 4 others
Pittsburgh, Pennsylvania

PGH - EMERGENCY PROTEST 1/2



📍 463 8 184

🇸🇮🇵 Liked by pittapartheiddivest and others

Αππ'εμπάργο πω! Down with the genocidal US-Israel... more
2 days ago

🇸🇮🇵 sjp_pitt and 5 others

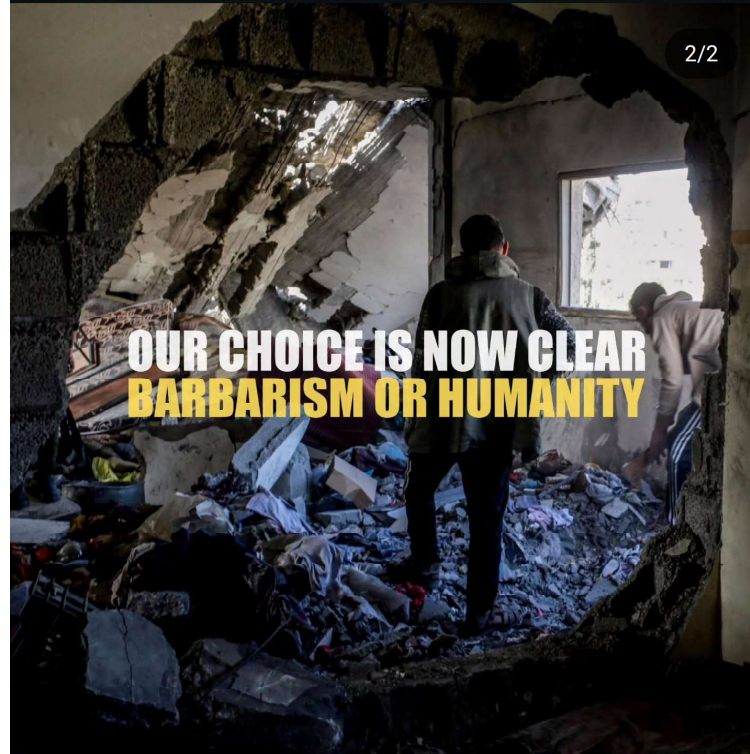
← Posts

Liked by pittapartheiddinvest and others

sjp_pitt Shiver me timbers 🤩🤩🤩

December 10, 2024

and 4 others
Pittsburgh, Pennsylvania



463 8 184

Liked by pittapartheiddinvest and others

Arm embargo now! Down with the genocidal US-Israel... more
2 days ago

sjp_pitt and 5 others

Exhibit 30



April 8, 2025

Students for Justice in Palestine at Pitt ([REDACTED])

Sent electronically to [REDACTED]

PERSONAL AND CONFIDENTIAL

Regarding Case Number: 2024178201

Dear Students for Justice in Palestine at Pitt,

In follow up to our last communication on March 19, 2025, we're in touch to resolve allegations relating to violations of the Student Code of Conduct. These allegations include the following:

Alleged violations relating to conduct and events at the Hillman Library in December 2024. The relevant provisions of the Student Code of Conduct include:

- 19. Violates or assists in the Violation of any policy, procedure or guideline of the University including, but not limited to the following: k. Any other policy, procedure, or guideline of the University whether or not listed in the Code
- 36. Fails without just cause to comply with the lawful direction of a University official, or other lawful authority having just cause and acting in the performance of their duties and authority.

Alleged violations relating to actions taken during the board hearing process. The relevant provisions of the Student Code of Conduct include:

- 35. Falsifies information or records submitted to a University official or office.
- 42. Intimidates, coerces, influences, or attempts to do the same against a person who is participating or has participated in any University process or proceeding.
- 43. Disrupts or interferes with the conduct process.

Alleged violations relating to actions taken in violation of the March 18, 2025 interim suspension. The relevant provisions of the Student Code of Conduct include:

- 36. Fails without just cause to comply with the lawful direction of a university official, or other lawful authority having just cause and acting in the performance of their duties and authority.

To discuss this matter, please attend a Disciplinary Conference on Friday, April 11, 2025, at 12:00pm. Please contact me at (412) 648-7805 or jmentzer@pitt.edu to state whether you would prefer an in-person or virtual Disciplinary Conference. If you do not contact me stating your preference within two business days from the date of this letter, you will be scheduled for a virtual Disciplinary Conference.

The purpose of the Disciplinary Conference, which may occur over a period of several meetings, is to 1) allow the Hearing Officer to discuss the conduct referral, including informational materials received and the alleged violation(s); 2) make recommended sanction(s), and 3) provide the opportunity to choose how to move forward through the conduct process. Those options are to:

- a. Accept responsibility for violating the Code and accept the recommended sanction(s) and waive the Level II Hearing and Appeal Process.
- b. Accept the general nature of the violation(s) and proceed before the Level II Conduct Hearing Board for a Sanctions-Only Hearing.
- c. Not accept responsibility for the Violation(s) and proceed before the Level II Conduct Hearing Board for a Full Hearing.

For a detailed description of the Level II process, please review Chapter 5 the [Student Code of Conduct](#).

The conduct process will move forward regardless of your participation. If you have questions or concerns, please contact me at (412) 648-7805 or jmentzer@pitt.edu.

Sincerely,

Jamey Mentzer
Associate Director of Student Conduct

CC: [REDACTED]
[REDACTED]

Exhibit 31



April 14, 2025

Students for Justice in Palestine at Pitt ([REDACTED])
Sent electronically to [REDACTED]

PERSONAL AND CONFIDENTIAL

Regarding Case Number: 2024178201

Dear Students for Justice in Palestine at Pitt (SJP),

Following the disciplinary conference for the Registered Student Organization Students for Justice in Palestine at Pitt held on April 11, 2025, please review the options for resolution below.

Recommended Sanction(s):

Termination of Registration with the ability to reapply for reinstatement after two (2) years.

Please respond to this email by 7:00pm Tuesday, April 15, 2025, with one of the below statements.

I, _____, having been informed of my rights as a President of my organization, do hereby waive the right to a hearing, admit to the general nature of the charge(s) filed against my organization and accept the above-recommended sanctions.

I, _____, having been informed of my rights as a President of my organization, do admit to the general nature of the charge(s) filed against my organization and request a Sanctions Only Hearing.

I, _____, having been informed of my rights as a President of my organization, do not admit to the nature of the charge(s) filed against my organization and request a Full Hearing.

As always, please reference the Student Code of Conduct regarding information about the process, violations, etc.

Sincerely,

Jamey Mentzer
Associate Director of Student Conduct

CC: [REDACTED]
[REDACTED]