

## EXHIBIT A

Max Price Personal Statement and Attached Exhibits

JEWISHINSIDER

## EXHIBIT A

My name is Max Price and I am a Junior at Tufts University. I am a student, a musician, a writer, and an aspiring policymaker. However, some parts of my identity are inalienable and nonnegotiable: I am a proud Jew and an outspoken defender of the right of all peoples to self-determination, as well as the Jewish right to live peacefully without fear of discrimination and prejudice. I committed to attending Tufts in 2018, proud to take my place at an elite institution of learning, most notable for its capacity for spirited and free debate on the great issues of our time. However, I was disappointed to find that my Jewish identity made me unfit to participate in this debate, at least in the eyes of some students and administrators. This is despite serving as a community leader, President of Tufts Friends of Israel, an elected member of the student Judiciary, and a tireless voice against anti-Semitism and bigotry in all of its forms. For these unforgivable crimes I have been targeted and marginalized, called a racist, a fascist, a Nazi, an enemy of progress. I have been slandered in the student newspaper and most recently, threatened with impeachment and removal from the student government. My innumerable complaints and warnings to the administration were unheeded and most often ignored, despite 30+ documented incidents of anti-Semitism over the last three years, including the posting of a swastika on the door of a Jewish student. The anti-Semitism that Jewish students face at Tufts is not always so immediately recognizable. It does not emanate from a secret cabal of white supremacists, nor an alt-right student collective. Rather, it camouflages itself to assume the form of progressive activism.

The specter of anti-Semitism, often under the guise of anti-Zionism, has haunted my Tufts experience from the beginning. I arrived in the wake of the passage of the Boycott, Divest, and Sanctions resolution and amidst the formation of a new blood libel: the Deadly Exchange. This conspiracy theory posits that the Israeli government, along with its Jewish American proponents, are responsible for institutional racism and police brutality in the United States. When asked in March 2020 by journalists for my personal opinion on this matter in my capacity as the President of Tufts' only Zionist student organization, I told the truth:

"It distracts from the real issues in our country and on our campus. The campaign rests on mistruths—the trip did not include training and was not with a military force—and ignores the fact that the seminar included Palestinian police, as well as Israeli police...the campaign maligns Israel by linking it to longstanding issues of systemic racism and police brutality in the United States, when in reality Israel is not accountable for the actions of TUPD or any American police in the past or future."

I was elected to the TCUJ in Spring 2020. Throughout the Deadly Exchange referendum process this Fall, I took on the constitutional responsibility ascribed to me: eliminating biased, misleading, or otherwise untruthful language from the proposed referendum text. As a member of the Judiciary,

I insisted upon honesty, balance, and transparency of intent throughout the referendum process. From the beginning of the process, I was completely straightforward about my personal beliefs on the subject and vowed to the other TCUJ members that I would not allow those beliefs to bias my decision making.

The initial referendum language provided by SJP contained several demonstrably untrue premises. First, the law enforcement exchange programs are not military-led trips. They do not feature military training or any formal meetings with active military officials in Israel. This can be verified by reading the trip itinerary that SJP provides. All past participants in these events, which feature both Palestinian and Israeli civil police officials, describe it as an educational seminar (as does the event's host, the Anti-Defamation League, which has fought bigotry for over a century). Second, SJP's proposed referendum language asked Tufts University to apologize for "sending" the former TUPD chief to this seminar and demanded that the university never do so again. However, the ADL sponsored the trip and invited the officer, and Tufts said publicly that they have no future plans to participate. Finally, the third clause of the referendum called for discrimination against a protected class, insisting that TUPD amend its hiring practices to exclude military veterans or others who have received military training.

When I pointed out these fact-based concerns with the proposed referendum language, the other members of the TCUJ agreed with me. TCUJ then attempted to negotiate in good faith with SJP to reach the shared goal of generating a fair, unbiased referendum that would challenge police militarization on Tufts' campus. On at least two occasions, the TCUJ sent specific proposed revisions to SJP in order to address the inaccuracies in their proposed text. SJP rejected the revisions (Exhibits 1-4).

I was shocked when fellow members of the student government asked me to recuse myself from constitutionally required deliberations on the language. In several emails, SJP members called me inherently "biased" and demanded that I be muted or barred from attending digital Judiciary meetings (Exhibits 5-11). I was told that I had an unavoidable conflict of interest by members of the Senate Executive board and student leaders in the Committee on Student Life and pressured, without regard to constitutional process, to dismiss myself from the proceedings. I refused. My Jewish identity is not an "conflict of interest." The only conflict I have is with misinformation, manipulation, bullying, and the scourge of anti-Semitism.

Student members of SJP have repeatedly and persistently harassed me in an attempt to silence my voice. First, they tried to force me to recuse myself and put pressure on the TCUJ and the leadership of TCU Senate and CSL to mandate my recusal. That did not work, so now SJP has filed a complaint seeking my impeachment and removal from student government. They are targeting me based on protected characteristics, my Judaism and my Zionism which is inherent in my expression of Judaism. They have made eminently clear their perspective that no person with my beliefs can

be allowed to participate in student government. That is why they are attempting to strip me of my rights as a Tufts student and as an American.

On November 15, in response to emails from SJP members, the TCUJ held an emergency meeting to determine whether I should have to recuse myself from the TCUJ discussions of the referendum language. At this meeting, my quotes from the March and April 2020 articles SJP had cited were read out loud and the TCUJ members were asked to consider whether these statements rendered me biased. In addition to considering my past statements, the TCUJ members discussed my conduct and the contributions that I had made during the referendum review process. In the end, all five members of the TCUJ agreed that my identity and perspective had not biased the referendum proceedings in any way. They agreed that I had provided valuable and necessary insight throughout, that my comments had been fact-based, and that my background knowledge of the issue at hand was of a net benefit. The TCUJ voted unanimously to recommend that I did not need to recuse myself. The other members of the TCUJ, with myself abstaining, also voted to send an email to SJP that (i) disputed the claims that the critiques of the referendum had been anything but fact-based, (ii) explained I had exhibited no bias throughout the process, and (iii) discussed the TCUJ's role in the referendum review process (Exhibit 4).

After the TCUJ members agreed that I did not have to recuse myself, SJP (refusing to accept that as an elected member of the TCUJ, I had a right and responsibility to participate in the process in full) submitted a second complaint to CSL and TCU Senate leadership (Exhibit 12). In response, the TCU Senate President set up a meeting for the next day, November 16, to discuss the allegations. I was led to believe that the purpose of the meeting was to decide conclusively whether the SJP allegations had any merit and whether any further action would be initiated against me. Present at the meeting were myself, TCU Senate President [REDACTED], TCU Vice President [REDACTED], TCU Treasurer [REDACTED], TCU Parliamentarian [REDACTED], TCU Diversity Officer [REDACTED], TCUJ Chair [REDACTED], TCUJ Vice Chair [REDACTED], CSL co-chair [REDACTED], CSL member [REDACTED], and Director of Campus Life [REDACTED], an administrator.

In my opening statement, I explained that Zionism is a crucial part of my Jewish identity, due to the shared Jewish history and heritage that is implicit in Zionism, but that identity has never impaired my ability to serve on TCUJ. In fact, I noted that my experience with the Israeli-Palestinian conflict had enhanced my capacity to evaluate the referendum question. Additionally, I shared my perspective that I personally see police demilitarization and criminal justice reform as key priorities. The other student government leaders grilled me for over an hour about whether my personal beliefs and Jewish and Zionist identities impact my ability to serve on the TCUJ on this issue. I was explicitly asked if being co-president of Tufts Friends of Israel—the sole Zionist student club on campus—rendered me too biased to participate in this process. The undercurrent of nearly every question was whether my Zionist beliefs, which are a central expression of my Jewish identity, disqualified me from serving on student government.



At no point were any of my substantive statements or actions during the TCUJ review process cited or specifically called into question. [REDACTED], the TCUJ Chair, spoke in my defense, asserting the official TCUJ position that I had not shown any bias throughout the process. At the conclusion of the meeting, all present participants agreed that there was no need for me to recuse myself, and no further steps were taken by TCU Senate, CSL, TCUJ, TCU Elections Committee (ECOM), Office for Campus Life (OCL), or any other body on this subject.

SJP, however, would not give up. They continued to pressure [REDACTED] to force me to recuse myself (Exhibits 13,14). The final meeting of the TCUJ to discuss and vote on the wording of the referendum was scheduled to take place on November 18, 2020 at 7:00 PM. Shortly before this meeting was scheduled to start, I was informed by [REDACTED] (via a group text to the TCUJ members) that I would have to remain on mute during the entire meeting (which was being held via Zoom) (Exhibit 15). We were also informed that SJP members would be joining the meeting and would be bringing a guest speaker, Eran Efrati, to educate the TCUJ members on the Deadly Exchange campaign. SJP presented Mr. Efrati as an “expert.” However, Mr. Efrati is known to have expressed anti-Semitic sentiments including comparing the Israeli government to the Nazis. That Mr. Efrati, who was central to the generation of the Deadly Exchange conspiracy theory, was considered an academic source while I was considered too biased to participate demonstrates the cognitive dissonance present in SJP’s complaint.

When I joined the TCUJ Zoom meeting at approximately 7:00 PM, [REDACTED] immediately announced that I would have to mute myself once SJP joined the session. Though I had the technical capability to unmute myself, [REDACTED] warned that he was running the meeting and would re-mute me if I attempted to speak. I challenged this decision as unjust and unwarranted, especially in light of the TCUJ’s conclusion only days earlier that I had been an unbiased and valuable member of the committee. [REDACTED] responded that the only way he was able to get SJP to agree to attend the meeting in order to reach an agreement on final referendum language was if I was silenced.

When I expressed concern about the bias of both the referendum’s language and SJP’s outside expert and noted that as a member of the TCUJ I have a right to speak, [REDACTED] insisted that I would have to remain muted during the meeting, but he suggested that I track down a third-party proxy to present my position. I had 15 minutes before the SJP members and Mr. Efrati were scheduled to join the call. I scrambled during the next few minutes to find a speaker who would be able to respond to what I feared would be misleading statements made by Mr. Efrati. I was able to find a pro-Israel activist on Twitter, Mr. Joshua Washington of the Institute for Black Solidarity with Israel. Mr. Washington, despite not knowing me and having no preparation time to talk to me about the issue, agreed to join the Zoom meeting to respond to any biased statements of SJP and Mr. Efrati. During the meeting, Mr. Efrati was permitted to speak without interruption. However,

as soon as Mr. Washington began speaking, he was repeatedly interrupted by the members of SJP who demanded that he be prohibited from participating. This demand was made despite SJP inviting their own, deeply biased speaker to the meeting. Ultimately, Mr. Washington was barely able to speak for a full minute for the entirety of the meeting.

I attempted to provide some perspective to SJP's heavily biased presentation by texting fact-checks to the other TCUJ members in our group chat. Another member asked me to better explain my positions after SJP and Mr. Washington left the Zoom meeting, before the vote. Unfortunately, I never had that opportunity because [REDACTED] suddenly and unexpectedly called for the vote at 7:58 PM, demanding that the TCUJ members vote via Facebook messenger and conclude the process. In a highly unusual if not unprecedented move, SJP—the sponsor of the referendum—was allowed to stay on the call and observe the voting (Exhibit 16). The referendum language that passed with a vote of two ayes, 1 nay, and 2 abstentions was:

Do you support Tufts University administration 1) apologizing for sending the former Tufts police chief to an intensive week long course led by senior commanders in the Israel National Police, experts from Israel's intelligence and security services, and the Israeli Defense Force 2) prohibiting TUPD officers from attending programs based on military strategies and/or similar international trips in the future, and 3) refining the vetting process to prevent prior attendees from being hired? (Exhibit 17)

By silencing me, SJP and the TCUJ Chair robbed me of my rights under the TCU Constitution. The TCU Bill of Rights expressly provides that “[a]ll members of the TCU shall be entitled to . . . [a]ctively participate in the TCU government by voting on campus-wide issues, . . . [and] participating during meetings of the government or Senate . . . .” Nowhere in the TCU Constitution is it suggested that a member of TCUJ is empowered to silence a specific member of the TCUJ during a meeting for a vote on an issue. The responsibilities of the Chair of the TCUJ are clearly enumerated; none can be construed as empowering the Chair to take such action as SJP demanded or as Mr. Dahlerbruch took on November 18.

With respect to SJP's claims that I was somehow in collusion with Mr. Washington's actions (recording the TCUJ meeting and posting it online), there is documented proof that I was furious with Mr. Washington and messaged him demanding that he take down the video immediately (Exhibits 18-20). As for the allegation that Mr. Washington's attendance was not allowed under Tufts guidelines, there is no formal process for which I am aware. I was following the instructions of the TCUJ Chair, and Mr. Washington's attendance to the TCUJ meeting was of the same form as Mr. Efrati's.

During the course of the Deadly Exchange referendum campaign, SJP ran roughshod over the Tufts Constitution in more ways than just silencing me during the TCUJ meeting. SJP students violated several clauses of the TCU Constitution, the Judiciary Bylaws, and the Elections Commission (ECOM) Bylaws in their haste to get the Deadly Exchange language on the ballot. They violated the order for referendum proceedings set out in the Constitution. SJP began collecting petition signatures before it had received approval of its proposed language. The Constitution requires the Judiciary to first approve referendum language as unbiased and factually accurate. Then the Committee on Student Life must rule on the referendum language's legality and compliance with University guidelines. SJP began collecting petition signatures before the Judiciary Committee and the Committee on Student Life had completed their review. By asking the student body to sign on to referendum language that had not yet been vetted and approved, SJP increased the pressure on the TCUJ and CSL to accept the problematic language it had submitted. In addition, despite having no constitutional role in the process, the TCU Senate repeatedly pressured the Judiciary to rush through the referendum without due process, threatening to recall elected representatives. The TCU President even showed up unannounced to a Judiciary meeting, violating separation of powers, to express her hope that the referendum language would pass through quickly. The Election Commission failed to inform the Judiciary of plans to rapidly hold an election, which put unexpected pressure on the Judiciary to quickly approve a biased referendum text. ECOM also failed to hold a constitutionally-required public forum on the referendum two days before the vote. These are just a few of the rules that were broken.

Astonishingly, after SJP succeeded in silencing me, getting its language on the ballot, and passing the referendum initiative, SJP was still not done harassing me. The TCUJ, and the leadership of the TCU Senate and CSL all agreed that I had conducted myself appropriately and without bias throughout the process and that my contributions to the TCUJ review had been helpful. Despite this, SJP filed a formal complaint with the TCU Senate seeking to have me removed from my position on the TCUJ. Although the complaint claims to be against all members of the TCUJ, I am the only member of the TCUJ who is singled out by name, and I am the only one targeted for impeachment.

SJP appears determined to remove me from the TCUJ in advance of the Boycott, Divestment and Sanctions campaign they have announced they intend to launch this Spring. They wish to cleanse the TCUJ of individuals who support Israel, particularly students like me, for whom belief in a Jewish homeland is integral to my identity as a Jew. To the members of SJP who filed this complaint, I am not a legitimate member of the student government. I am simply an obstacle to their agenda due to inherent facets of my identity. This is an intolerable attack on my First Amendment rights.

SJP and the TCU Senate have also denied me due process rights as set out in the Tufts Student Conduct Resolution Procedure (SCRCP). According to the SCRCP, complaints like the one that SJP

filed against me, should be submitted to the Office of Community Standards (SCRPC). A “conduct officer” from the administration is then supposed to be assigned to the case, and the conduct officer is supposed to schedule an “initial meeting” to speak with me about the complaint (SCRPI (4)). This meeting ensures that baseless, harassing complaints, like the one that SJP has filed against me, do not proceed to a hearing. The TCU Senate, however, moved ahead and tentatively scheduled a disciplinary hearing for February 7 without providing me the opportunity to speak with a conduct officer. When I pointed out this failure to follow procedure, I was told that the TCU Senate plans to follow Section K of the SCRPI for the actual disciplinary hearing, but the Senate will not be complying with the preliminary procedures outlined in the SCRPI. This is a severe violation of my due process rights that cannot and should not be tolerated.

What troubles me most about the Deadly Exchange referendum is how it hijacks critical problems in our society such as systemic racism, police brutality, and criminal justice reform. On our own campus and throughout the country, we must recognize the peril of an increasingly militarized police and a predatory legal system. These righteous causes demand thoughtful consideration and strong action but are being co-opted for an agenda driven by Jew hatred. SJP’s campaign is counterproductive, serving as an excuse for perpetrators of inequity and an insult to its victims.

For these and many other reasons, I voted against the dishonest language and malevolent intent of this referendum. I was alone in doing so. With two positive votes and two abstentions, the motion passed. As I reflect on the dangerous precedent that this referendum sets, it is clear that a “no” vote is insufficient. I recognize that even if I am the first to suffer such an injustice at Tufts, I will not be the last. My rights under the law and campus conduct policies have been threatened, and the attempt to bring me before an impeachment hearing is simply the next step in a long line of injustices against me on the basis of immutable characteristics. This hearing must be stopped from taking place to avoid violation of Tufts’ own university policies, Title VI of the Civil Rights Act, and the US Constitution.

Max Price  
Tufts Class of 2022

A handwritten signature in black ink, appearing to read "Max Price", with a stylized flourish at the end.



From: [REDACTED]  
Sent: Thursday, October 29, 2020 6:08:05 PM  
To: [REDACTED]  
Cc: [REDACTED]

Subject: Re: SJP Referendum

Hello [REDACTED]

I have additionally copied the TCUJ email and my vice chair, [REDACTED]

We did have a chance to discuss this. We also had a discussion about TREE's referendum and had a point on theirs to clarify. Here is the wording of SJP's referendum which you submitted to us:

*"Do you support Tufts University administration 1) prohibiting TUPD officers from attending military training trips abroad, 2) apologizing for sending the former police chief on a military training trip to Israel, and 3) refining the vetting process to prevent prior military training attendees from being hired?"*

Here are the challenges that were discussed during last night's meeting as to why these words are potentially biased, misleading, or potentially antagonizing.

**Military Training:** There are concerns that this is not factually accurate. One member of the J brought up the idea that what was attended was a security and anti-terrorism seminar. Having the phrase "military" and "training" makes it seem that this was an in-the-field type program that was based on members of TUPD physically training. We request the change of both of these words to be more accurate or a source that proves these words are accurate since we do not want this to be misleading.

**Israel:** By the way that this is worded, it seems like you want TUPD to 1) stop sending trips abroad, 2) apologize for past trips, and 3) prevent military training attendees from being hired. Based on this, and the specific wording that you have sent us, we see the use of specifying Israel as an unnecessary point of bias and complicate this for the purpose of voting. One other concern is if there have been any other trips TUPD officers have taken abroad. Singling out Israel we do not think is justified in relation to the expressed written referendum as a whole.

Finally, the third section we don't really have anything language wise to add, but rather we have concern that the CSL will likely discuss. The third part as written breaks current federal and state law on discrimination on the basis of hiring and veteran status. There may be a way to refine or remove this point which will be helpful when proceeding through CSL, and may potentially speed up the process.

Once again, sorry for the delay. We would love to discuss these points in more detail if you would like,

Sincerely,

[REDACTED] and the TCU Judiciary

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**From:** [REDACTED]  
**Date:** Thursday, October 29, 2020 at 5:19 PM  
**To:** [REDACTED] >  
**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Subject:** Re: SJP Referendum

Hey [REDACTED],

Just following up on this, were you able to discuss this at your meeting yesterday? We are hoping to present our referendum to the CSL at their next meeting, which will be late next week, so we'd appreciate it if you could get to it before then! Also, I believe TREE is following a similar process and, as we are trying to do our referendums together, if you could please work through theirs as well, that'd be great.

Thanks,

[REDACTED]

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## EXHIBIT 2

**From:** [REDACTED]  
**Date:** Monday, November 2, 2020 at 12:43 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
[REDACTED]

**Subject:** Re: SJP Referendum

Hi [REDACTED]

We will attend your meeting Wednesday. Please send along the zoom link. We will also send along an updated version to yourself and the other members of the J tonight after our SJP meeting tonight, likely around 9 for you all to review before then.

Thanks,  
[REDACTED]

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**From:** [REDACTED]  
**Sent:** Saturday, October 31, 2020 9:41:46 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
[REDACTED]

**Subject:** Re: SJP Referendum

Dear [REDACTED],

We meet Wednesdays. Many of us, as students at Tufts University, are stressed, busy, and don't necessarily have the ability to schedule a last minute meeting. We are also going through recognitions season. That being said, we have two options for you on how to proceed:

Option 1: You can meet with us first. If you do this, we can do this coming Wednesday at 8:45 pm or we can do Friday, November 6<sup>th</sup> at 4:30pm. If you would like to follow this option please have alternative wording in mind. Otherwise, feel free to send updated wording on the referendum and we can review virtually which may speed the process. We cannot meet all together until Wednesday so I am sorry if this is not convenient.



Option 2: Start with CSL. If you take the referendum to CSL first you can then bring it to the J to work on wording. This is the preferred process for the TCU Constitution and may speed up the CSL process which can make a Wednesday meeting more convenient in the coming weeks.

Either way, feel free to send updated wording. While meetings in person should include the whole Judiciary, we can try to start working through the process virtually to speed everything up.

Thank you,

[REDACTED]

TCU Judiciary

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JEWISH INSIDER

### EXHIBIT 3

From: [REDACTED]

Sent: Friday, November 13, 2020 5:25 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: Re: Final Language for Referendum

Dear SJP,

Our apologies for the delay. We decided that the voting to approve needed to be a discussion among J members rather than just a poll on a group chat. We just completed that meeting.

Upon further review of the official language that was sent, we voted against approving the referendum wording due to newly-discovered misinformation. The text pulled from the ADL Website was in reference to the "National Counter-Terrorism Seminar" which is a different ADL-hosted event than the "Leadership Seminar" that the TUPD Officer in question attended in 2017. The National Counter-Terrorism Seminar has not been run since 2014.

This is a link to the description we believe to be your source to describe the seminar but in actuality is for a different seminar that has not been run since 2014: <https://dc.adl.org/national-counter-terrorism-seminar-in-israel/>

This is the link that describes the seminar attended by the TUPD officer: <https://www.adl.org/who-we-are/our-organization/signature-programs/law-enforcement-trainings/leadership-seminar-in-israel>

It is important to note here that there is a significant difference in itineraries between these two seminars. We understand that the National Counter-Terrorism Seminar turned into the Leadership Seminar in Israel, but with that came material itinerary changes that removed components led by the IDF among other changes that warranted a changed name and focus.

Due to this information and the concern of accuracy, we are unable to approve the wording that you submitted.

We suggest the following which we feel is more accurate and fair than what was initially submitted on the basis of the itinerary changes between the two seminars.

**"Do you support Tufts University administration 1) apologizing for sending the former Tufts police chief to an intensive week-long seminar based on strategies developed by the Israel National Police and featuring experts from Israel's intelligence and security services, 2) prohibiting TUPD officers from attending similar international trips and/or law enforcement training seminars in the future, and 3) refining the vetting process to prevent prior attendees from being hired?"**

In this variation, we only changed three items as follows:

1. We removed the mention of the Israeli Defense Force as that component was not a part of the itinerary for the year that the TUPD officer in question was in attendance. We do not believe this inclusion was factually accurate and therefore we believe it is unfair. Additionally, the Israeli military is officially named "Israel Defense Forces".
2. We replaced the description of the seminar with one that is more accurate and fairly portrays the content of the seminar as per the ADL website. The wording provided was based on a description of a significantly different seminar and it was therefore unfair.
3. We removed the phrase military-led once again with the belief of it being unfair. Upon further review of the sources provided, we do not believe that the seminar itself was military-led but we do believe it was a law enforcement seminar. Based on the itineraries provided, calling it military-led is unfair.

Despite our recommended changes, we do believe that our suggested wording is a fair approach and description of what occurred. This still gets your point and intention across to allow for people to vote for the same thing but in a more fair manner.

In the case that you submit a revised and more accurate wording, we can vote. Additionally, we plan on voting within 48 hours of an additional submission due to the time constraints of the upcoming election.

Thank you for your consideration,

TCU Judiciary

<https://>

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**Fwd: Final Language for Referendum**

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TCU Judiciary [REDACTED]

Tue, Nov 17, 2020 at 12:45 AM

To: [REDACTED]

Cc: [REDACTED]

Dear SJP,

Once again, we would like to encourage the following wording:

"Do you support Tufts University administration 1) apologizing for sending the former Tufts police chief to an intensive week-long seminar based on strategies developed by the Israel National Police and featuring experts from Israel's intelligence and security services, 2) prohibiting TUPD officers from attending similar international trips and/or law enforcement training seminars in the future, and 3) refining the vetting process to prevent prior attendees from being hired?"

This wording, as provided, is indisputable. No matter the belief on the topic, political affiliation, identity, or any other descriptor an individual may have, this wording is fact. According to all sources on the topic including those you provided, this is accurate. The Judiciary affirmed this with a unanimous vote where the member you alleged was biased abstained.

Today, we met with members of the Senate Executive Board and two members from CSL to discuss the process. We made it clear to them, as we had to SJP, that the way to make the wording of an inherently-biased referendum fair is through the creation of wording that is indisputable. We want people to read information that is factually accurate no matter the lens one brings so the only question is one of support for the referendum.

As such, while this language is a little bit more general than the initially submitted referendum, it is indisputable. Everything provided is factually accurate and, where more specifics exist, the added specificity may be disputed amongst many groups. We want the perceived intention of this referendum to be clear. We want to make sure that the wording provided is accurate in order to further establish what approval by the Tufts Student Body means. We don't want any component to be called into question based on language or process. When the administration gets a final referendum, they get the wording and the result of the vote. When administration receives this wording we want there to be no question as to what the result of the vote means and what the will of the student body is. We believe the wording we provided is clear, indisputable, and carries the intentions and purpose.

We urge you to consider this carefully. We are happy to further explain our reasoning for these issues during Wednesday Night's meeting.

Signed,

TCU Judiciary



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**From:** [REDACTED]  
**Date:** Monday, November 16, 2020 at 6:25 PM  
**To:** TCU Judiciary [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Re: Final Language for Referendum

Hello Everyone!

Just wanted to follow up on my previous email! Its been 48 hours since we sent you our wording so I just wanted to check in to see if you have an answer because the Special Elections are in 8 days, so everything is really time sensitive.

Best,

SJP

[Quoted text hidden]

## EXHIBIT 5

### Fwd: Final Language for Referendum

10 messages

To: [REDACTED] Sat, Nov 14, 2020 at 1:37 PM  
[REDACTED] "Price, Max H"

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From: [REDACTED]  
Sent: Saturday, November 14, 2020 1:33:13 PM  
To: TCU Judiciary [REDACTED]  
Cc: [REDACTED]

Subject: Re: Final Language for Referendum

Dear Members of the Judiciary,

Thank you for your notes and diligent research into the trips! We've investigated the claims and here is what we found.

1. We understand that you believe the name change does corresponds with an itinerary change, but according to [the website](#) you sent us "the Leadership Seminar (formerly known as the National Counter-Terrorism Seminar in Israel) was created in 2003 and is held annually," which doesn't in and of itself prove that there was also a change in itinerary. While the current wording denies military involvement of any kind, it does not necessarily reflect the trip that the police chief went on in 2017. We have reason to believe that the wording on the ADL website has been changed at some point since at least January 2018 when the [Tufts Daily](#) reported on the story. The article shows that the university admitted to participating in the National Counter Terrorism Seminar (and this language about the trip is consistent throughout the article). This direct quote from the Daily article states "according to the ADL's webpage on the seminar, officials attend the NCTS "to study first hand Israel's tactics and strategies to combat terrorism," learning from "senior commanders in the Israel National Police, experts from Israel's intelligence and security services, and the Israel Defense Forces." The

language of our referendum is based on the Tufts Daily article which references the ADL website at the time, aka before the change in language, and accurately describes the trip that Kevin Maguire went on in December of 2017.

2. According to

[this article](#) from

the Seattle Times regarding the ADL's counterterrorism seminar in December 2017, it "brought together members of law enforcement of every level from throughout New England to learn from senior Israeli intelligence, police and military officials about the latest methods of preventing terrorism." This same article describes a visit to East Jerusalem, an occupied city controlled heavily by both Israeli military as well as border police.

3. Additionally, one of itineraries from 2016 and 2017 that are on the

[JVP website](#),

describes the trips as meeting with "Shin Bet (also known as the Israel Security Agency (ISA) or Shabak)" a "key Israeli security organization" as well as visiting "checkpoints"

which are "the central infrastructure used by the Israeli military to impose restrictions on Palestinian movement."

[Checkpoints](#) are

frequently staffed by military officers, emphasizing how individuals participating in the training trip are in contact and having conversations with IDF soldiers.

4. Regarding the timeline of the trips' names and itineraries: in your email you say that the trip was changed

in 2014 to end contact with military officials. However, the itinerary we have referenced above is from 2016, after the purported change, and yet the evidence shows that as of 2016, participants were still meeting with military officials. While we don't presently

have the exact itinerary of the 2017 trip, we believe that it would be consistent with the 2016 agenda.

Lastly, we wanted to check in and ensure that there was no one who was potentially biased or cannot be objective in your voting.

In the [TCU](#)

[J Constitution](#), it says "any member of the TCU J may voluntarily recuse themselves from a vote if they feel they cannot

be objective or have a conflict of interest." While no one in the TCU J is a member of SJP, there are members in TCU J who have been explicitly biased statements against SJP and our campaign's efforts—thus, creating an environment where one cannot be objective.

It is highly disturbing to us that someone in your voting party is not objective, and directly [condemned](#) the



Deadly Exchange Campaign and publicly [agreed](#) with President Monaco condemning SJP's award for the collaboration we did in the campaign.

Due to all these factors, we've decided to remain consistent in the wording we agreed on last week and hope you will reconsider.

We hope that next time the J meets to vote on this matter, they alert us so that we may attend the meeting, since J meetings are meant to be open to the public for comment, according to the bylaws.

We look forward to hearing from you!

Best,  
SJP

JEWISHINSIDER

## EXHIBIT 6

artz  
4W  
November 14, 2020 at 1:50 PM

At this point they have pinpointed @Max Price as a point of bias. I think we need to ask him to recuse himself and request the last change.

JEWISH INSIDER

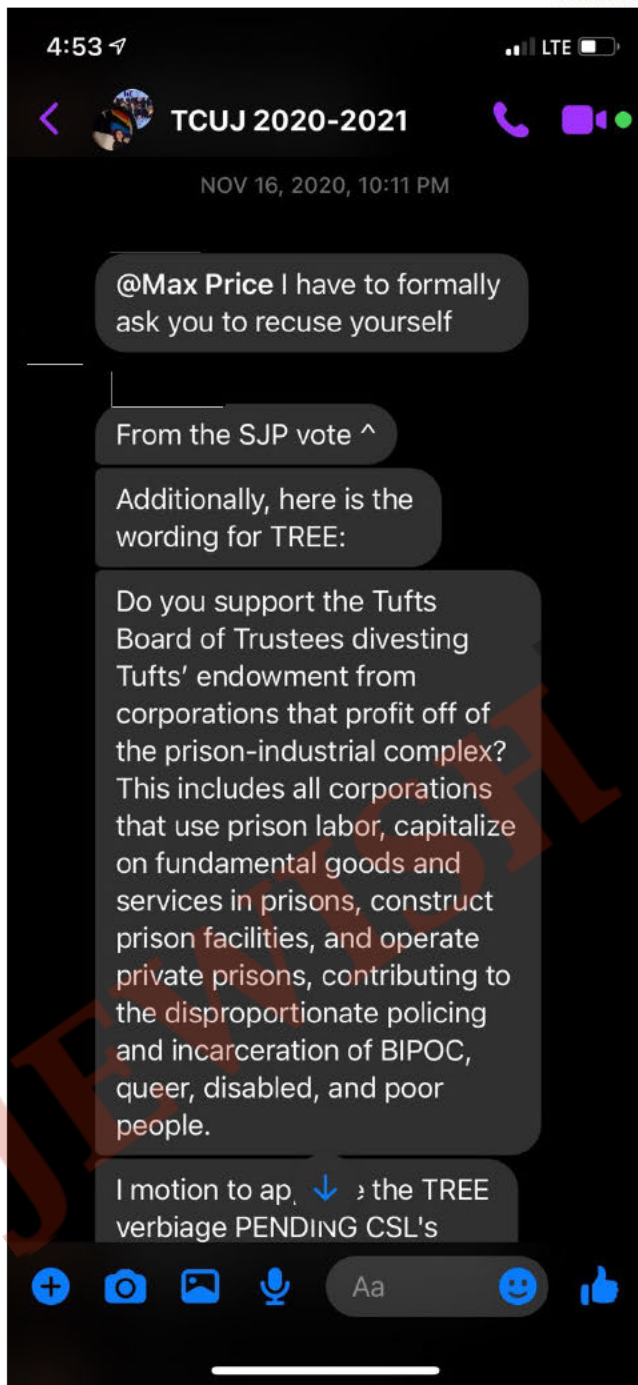
## EXHIBIT 7

November 14, 2020 at 2:03 PM

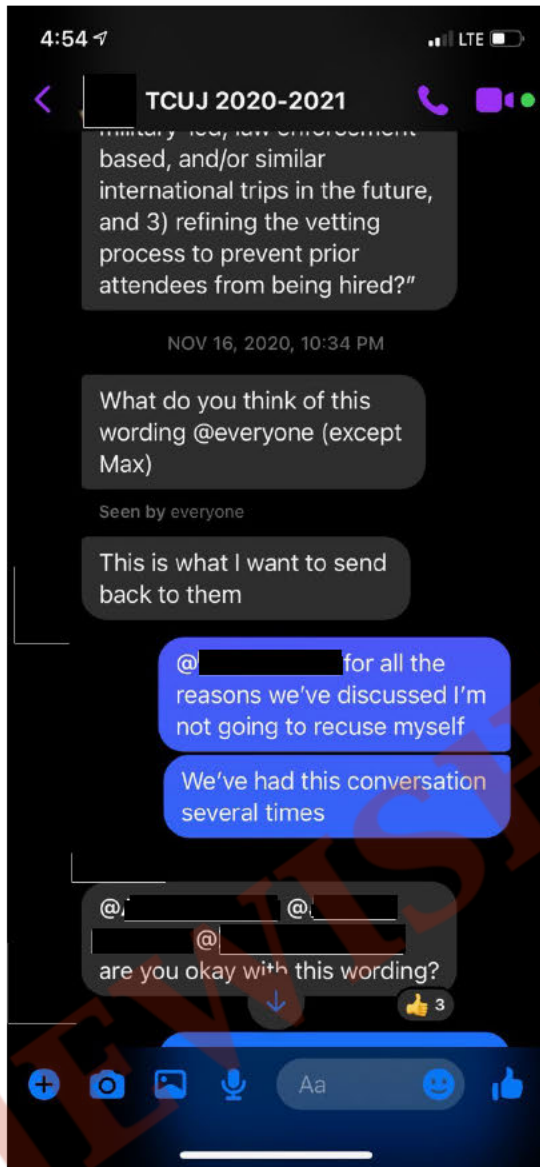
Their critiques are highly questionable. They are making the same logical leap from one version of the trip to another. They acknowledge that the itineraries are not the same. We need to take time to look into the factual accuracy of what they are saying before we respond. Additionally, I don't think we should vote before CSL rules on this. With regards to recusing myself, I've been straightforward about my personal feelings on this. However, I have not demonstrated any bias during this process and have only pointed out misinformation and bias in the language, and I don't see any reason to recuse myself given that I have followed our constitutional role this entire time.

JEWISHINSIDE

## Exhibit 8



## Exhibit 9



## Exhibit 10

**From:** [REDACTED]  
**Date:** Wednesday, November 18, 2020 at 5:32 PM  
**To:** TCU Judiciary [REDACTED]  
**Subject:** Re: Final Language for Referendum

Hi TCU Judiciary,

Thank you for your response! A couple points before tonights meeting: as discussed in our prior email wherein you conceded that Max Price is biased, we would like to reiterate that Max should neither be involved in the meeting tonight nor in influencing the opinions of other J members before the vote on the wording. Additionally, Eran Efrati will be joining us tonight partway through our meeting, likely around 740 or 745. We look forward to seeing you before then at 7:30!

Best,  
SJP

JEWISH INSIDER

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

From: [REDACTED]  
Date: Wed, Nov 18, 2020 at 7:04 PM  
Subject: Re: Final Language for Referendum  
To: TCU Judiciary [REDACTED]  
Cc: [REDACTED]

[REDACTED] Tufts Judiciary,

We are putting this referendum out as a group with the intended goal of it passing. As such, we should have every opportunity and resource to prove that our wording accurately represents what the referendum question refers to. There is a distinct difference between the two sources, as you call them, since one is a voting member and the other is an expert on the topic at hand. We asked Eran to join as an expert on the subject to help show to you that what you may believe to be disputable is in fact indisputable. On the other hand, Max Price should not be allowed to attend and advocate against the wording of our referendum as he has demonstrated clear and public opposition to our campaign. Moreover, it is up to the student body to decide if our question passes. Your insistence on "fairness" has consistently been opposed to your actions aimed at centering yourselves and your preferences for our referendum rather than the group and campaign that is putting forth the question.

Thanks,  
SJP



## Exhibit 12

  Trouble with the Judiciary  
To:  & 10 more [Details](#)

Students  
of the Committee on Student Life,

We,  
as members of SJP, are writing regarding the Judiciary's handling of our referendum.

We  
have been working on this referendum process since the beginning of this semester. As you may remember, we had a referendum established for last semester that we had to postpone due to COVID-19. However, this semester we were forced to restart the process to create our referendum. Immediately, we ran into difficulty with this Judiciary, which objected to the process we used last time and then took more than a month to determine how the referendum should be approved.

Their  
process requires that the Judiciary ensures that our question is worded fairly after which it is sent to the CSL to make sure it is in accordance with state and federal laws. However, since embarking on this new approval process the Judiciary has been unwilling to work with us to determine fair wording for our referendum. We have been working with them since October 28th; we have sent them multiple drafts and options for our question with long explanations for our word choice and sources to address all the issues they've raised. They have rejected every one of our proposed questions and ignored our various resources and arguments that explain our choices.

Their  
objections themselves have been biased against pro-Palestinian rhetoric and even the mere mention of Israel. Obviously the Judiciary themselves are not free of bias, and we believe that they are capitalizing on their positions of power to prevent the student body from voting on the message that we want. The bias of a few individual students should not hinder the voting process for the greater student body. The role of the Judiciary in this process should be to help us craft fair wording and to honour the requests of the Student Group that is proposing the referendum, but through our experience working with them, we strongly believe that this is not their intention.

They  
have failed to respond to our emails and requests to meet for days at a time, instead choosing to wait until their meetings to dispute our responses. They seem to have very little interest in ensuring the student body's right to vote on this issue. As further demonstrated by their inane attempt to suspend the Senate and ECOM, the Judiciary this semester has been acting outside of the bounds of reason and does not seem to have the student body's best interests at heart.

As  
our student representatives on the CSL, we would like to meet with you sometime this coming week, ideally before your meeting Friday, to discuss the process of appealing the Judiciary's rejection of our proposals. We plan to have our referendum on the same day as the TCU special elections, November 24th, so we see no other option than to circumvent the Judiciary. In doing so, we hope to be able to get this referendum approved at your meeting on Friday.

Best,  
SJP

## EXHIBIT 13

Tue, Nov 17, 2020 at 12:06 PM

to: "Price, Max H"

---

**From:** [REDACTED]  
**Date:** Tuesday, November 17, 2020 at 12:04 PM  
**To:** TCU Judiciary [REDACTED]  
**Cc:** [REDACTED]  
[REDACTED]

**Subject:** Re: Final Language for Referendum

Hi TCU Judiciary,

Thanks for the update. Tomorrow, the 18th, from 8-9 p.m. we have an event planned with Eran Efrati, an expert on the Deadly Exchange. Eran Efrati is the director of Researching the American-Israeli Alliance (RAIA) and a former soldier in the Israeli Defense Force; he now researches the Israeli military and arms industry with a focus on military and police partnerships between the United States and Israel.

We would like to extend to you all an invitation to attend this meeting in order to give you more context for the exact "counterterrorism" training that former Police Chief Kevin Macguire went on. Eran will be able to expertly answer any questions you may have so that you may feel more comfortable and equipped to assess our wording regarding these trainings. We urge you all to attend so that we can have a more productive meeting afterwards on Wednesday and finalize the referendum language since time is of the essence.

The zoom link to register for this meeting is: [REDACTED]  
[REDACTED] If you all are not able to make the full event feel free to come for part of it. Eran is also able to stay after the event to meet with you all personally if you cannot make it before 9 p.m.

We look forward to resolving this matter in an efficient manner. When you are able, can you also send the zoom link for your Wednesday meeting?

Thank you,

SJP

io: [REDACTED] Wed, Nov 18, 2020 at 4:15 PM  
"Price, Max H"

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

From: [REDACTED]  
Date: Wed, Nov 18, 2020 at 4:13 PM  
Subject: Re: Final Language for Referendum  
To: TCU Judiciary [REDACTED]  
CC: [REDACTED]

Hi TCU Judiciary,

Please respond to our message so we may attend your meeting this evening and let Eran Efrati know when you all are available to meet with him.

SJP

TCU Judiciary [REDACTED] Wed, Nov 18, 2020 at 4:58 PM  
To: "Price, Max H" [REDACTED]

From: TCU Judiciary <[REDACTED]>  
Date: Wednesday, November 18, 2020 at 4:53 PM  
To: [REDACTED]  
Cc: [REDACTED]

Subject: Re: Final Language for Referendum

Dear SJP,

Our apologies. We did not know you were able to attend tonight's meeting. The link is here:

[REDACTED] is inviting you to a scheduled Zoom meeting.

Topic: TCU Judiciary Recognitions Meeting

Time: This is a recurring meeting Meet anytime

Join Zoom Meeting

[REDACTED]

Meeting ID [REDACTED]

Passcode: [REDACTED]

Tonight our available block is from 7:30pm-8pm. I hope you can attend.

As for the Eran Efrati event, sadly that is during the majority of our meeting that is regularly scheduled. As such none of us will be able to attend. We believe the meeting will end slightly prior to 9pm so we will not be able to meet afterwards. In the case that this changes we will send you an email.

If Eran Efrati would like to attend the 7:30-8pm slot we will gladly accept their attendance. Once again, I feel the need to reiterate that our goal is to make what is written indisputable so the opinion on the matter is the only question. I do not know if Eran Efrati's attendance will benefit the goal of removing bias and disputable claims.

Thank you for your consideration,

TCU Judiciary

---

**From:** [REDACTED]  
**Date:** Tuesday, November 17, 2020 at 12:04 PM  
**To:** TCU Judiciary [REDACTED]

[REDACTED]

**Subject:** Re: Final Language for Referendum

Hi TCU Judiciary,

[Quoted text hidden]

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**TCU Judiciary** [REDACTED] Wed, Nov 18, 2020 at 5:55 PM  
**To:** [REDACTED] "Price, Max H" [REDACTED]

[REDACTED]



---

**From:** [REDACTED]  
**Date:** Wednesday, November 18, 2020 at 5:32 PM  
**To:** TCU Judiciary [REDACTED]  
**Subject:** Re: Final Language for Referendum

Hi TCU Judiciary,

Thank you for your response! A couple points before tonight's meeting: as discussed in our prior email wherein you conceded that Max Price is biased, we would like to reiterate that Max should neither be involved in the meeting tonight nor in influencing the opinions of other J members before the vote on the wording. Additionally, Eran Efrati will be joining us tonight partway through our meeting, likely around 740 or 745. We look forward to seeing you before then at 7:30!

Best,

SJP

---

TCU Judiciary [REDACTED]

Wed, Nov 18, 2020 at 6:43 PM

To: [REDACTED]

Cc: [REDACTED]

Dear all,

As you did not reply all on the previous email, it is copied here:

"

Hi TCU Judiciary,

Thank you for your response! A couple points before tonight's meeting: as discussed in our prior email wherein you conceded that Max Price is biased, we would like to reiterate that Max should neither be involved in the meeting tonight nor in influencing the opinions of other J members before the vote on the wording. Additionally, Eran Efrati will be joining us tonight partway through our meeting, likely around 740 or 745. We look forward to seeing you before then at 7:30!

Best,

SJP

"

Before we meet I would like to clarify a few things as well.

Taking into account your 8pm event and an 8pm obligation that Holden has, the meeting must conclude by 8pm.

- 1.
2. We will happily welcome Eran Efrati to our meeting for however long they can be there. On the other hand, we do have a challenge based on your claim of our concession which has not occurred. We, as an organization, cannot concede this because, while we all recognize the indisputable fact that he has spoken publicly against your organization, it is not unanimous with the belief that he has been biased during any attempts to remove disputable claims. Max voluntarily abstained from the previous vote on your suggested language and a majority was still in opposition to the wording on the basis of being disputable. Welcoming Eran Efrati is based on the idea that they come in without external bias based on the mutual understanding that bias should not be present.
3. The current challenge we are both facing is the idea that we need to remove bias from the wording provided. As such, we feel the need to reiterate that we have been transparent with the idea that the way to remove biased wording is through the removal of any disputable claims. We are concerned with the current action of including a source with bias and the exclusion of a source with assumed bias since our goal is to remove all bias. At this point, the Judiciary wants to make this indisputable, as we all should, so we encourage any personal bias that anyone brings to the table to be removed as well.
4. Based on this understanding, if Eran Efrati is in attendance it is only fair to allow Max Price to be there as well. At 7:58pm the Judiciary will vote on the wording discussed in the meeting with you all in attendance. While this is not required or even suggested in our bylaws, we believe at this point it is only fair to see the results play out. The meeting must conclude by 8pm.

Thank you for your consideration,

TCU Judiciary

---

**From:** [REDACTED] on behalf of TCU Judiciary

**Date:** Wednesday, November 18, 2020 at 4:53 PM

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** Re: Final Language for Referendum

Dear SJP,

Our apologies. We did not know you were able to attend tonight's meeting. The link is here:

[REDACTED] is inviting you to a scheduled Zoom meeting.

Topic: TCU Judiciary Recognitions Meeting

Time: This is a recurring meeting Meet anytime

Join Zoom Meeting

Meeting ID [REDACTED]

Tonight our available block is from 7:30pm-8pm. I hope you can attend.

As for the Eran Efrati event, sadly that is during the majority of our meeting that is regularly scheduled. As such none of us will be able to attend. We believe the meeting will end slightly prior to 9pm so we will not be able to meet afterwards. In the case that this changes we will send you an email.

If Eran Efrati would like to attend the 7:30-8pm slot we will gladly accept their attendance. Once again, I feel the need to reiterate that our goal is to make what is written indisputable so the opinion on the matter is the only question. I do not know if Eran Efrati's attendance will benefit the goal of removing bias and disputable claims.

Thank you for your consideration,

TCU Judiciary

---

**From:** [REDACTED]

**Date:** Tuesday, November 17, 2020 at 12:04 PM

**To:** TCU Judiciary [REDACTED]

**Cc:** [REDACTED]

**Subject:** Re: Final Language for Referendum

Hi TCU Judiciary,

[Quoted text hidden]

---

**To:** Max Price [REDACTED]

"Price, Max H" [REDACTED]

Wed, Nov 18, 2020 at 7:06 PM



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

From: [REDACTED]  
Date: Wed, Nov 18, 2020 at 7:04 PM  
Subject: Re: Final Language for Referendum  
To: TCU Judiciary [REDACTED]  
Cc: [REDACTED]

Dear Tufts Judiciary,

We are putting this referendum out as a group with the intended goal of it passing. As such, we should have every opportunity and resource to prove that our wording accurately represents what the referendum question refers to. There is a distinct difference between the two sources, as you call them, since one is a voting member and the other is an expert on the topic at hand. We asked Eran to join as an expert on the subject to help show to you that what you may believe to be disputable is in fact indisputable. On the other hand, Max Price should not be allowed to attend and advocate against the wording of our referendum as he has demonstrated clear and public opposition to our campaign. Moreover, it is up to the student body to decide if our question passes. Your insistence on "fairness" has consistently been opposed to your actions aimed at centering yourselves and your preferences for our referendum rather than the group and campaign that is putting forth the question.

Thanks,  
SJP

## EXHIBIT 14

EXHIBIT 14

**From:** [REDACTED]  
**Date:** Wednesday, November 18, 2020 at 5:32 PM  
**To:** TCU Judiciary [REDACTED]  
**Subject:** Re: Final Language for Referendum

Hi TCU Judiciary,

Thank you for your response! A couple points before tonights meeting: as discussed in our prior email wherein you conceded that Max Price is biased, we would like to reiterate that Max should neither be involved in the meeting tonight nor in influencing the opinions of other J members before the vote on the wording. Additionally, Eran Efrati will be joining us tonight partway through our meeting, likely around 740 or 745. We look forward to seeing you before then at 7:30!

Best,

SJP

EXHIBIT 15

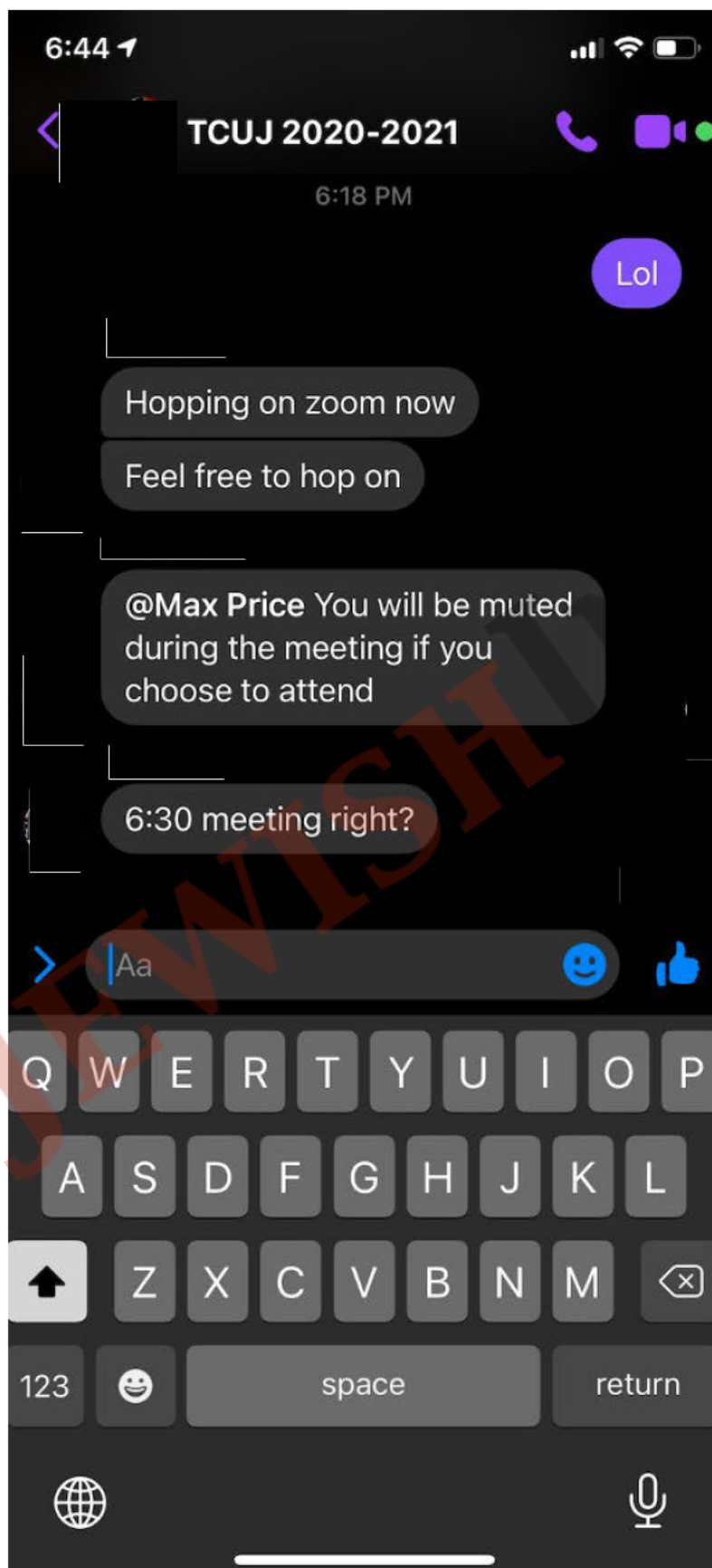
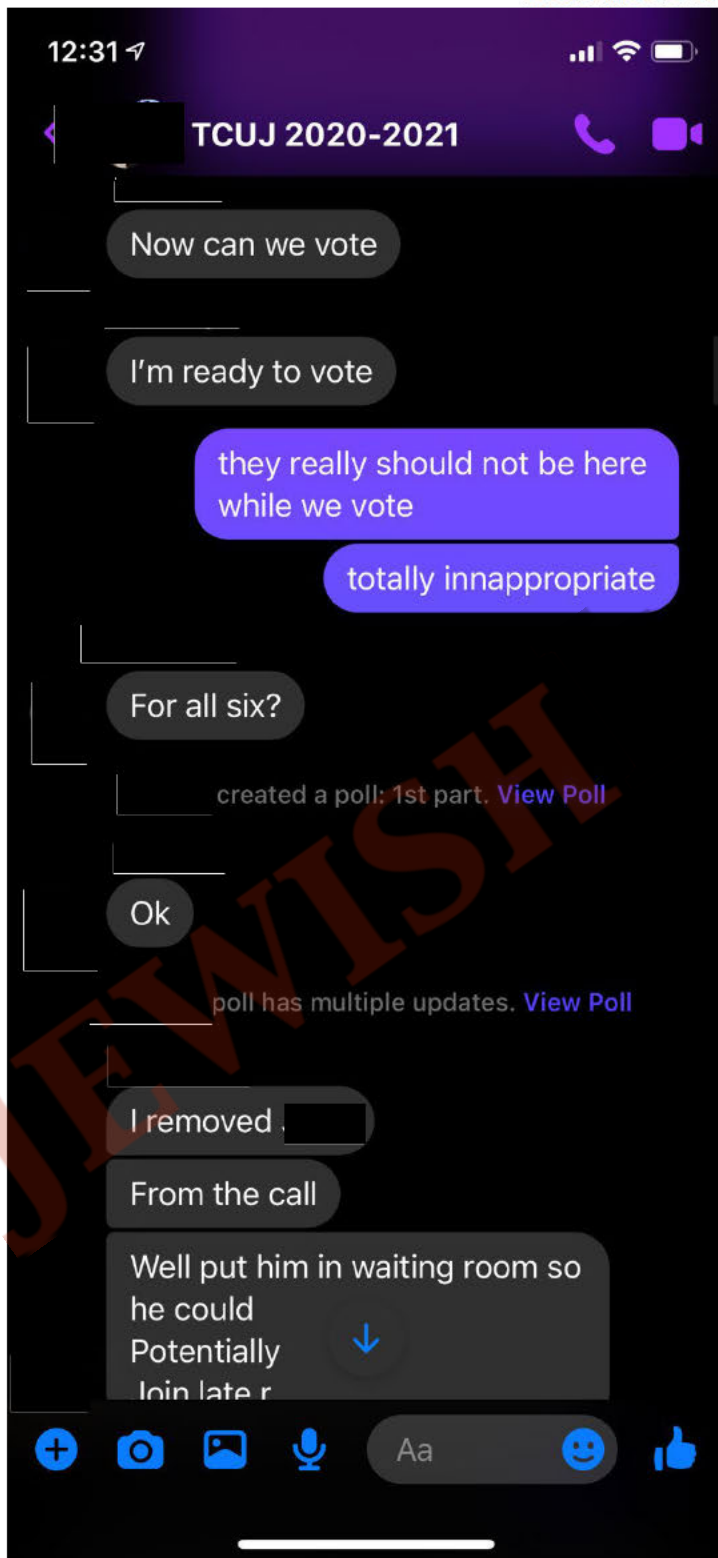


EXHIBIT 16



## Exhibit 17

From: TCU Judiciary [REDACTED]  
Date: November 18, 2020 at 9:33:10 PM EST  
To: [REDACTED]

Subject: SJP Referendum

Dear SJP,

Thank you for being so patient and diligent with this process.

The Judiciary has voted and the following wording (provided below) has been approved **PENDING** approval from the CSL. In accordance with the TCU Constitution, CSL must approve the wording before the Judiciary, but if they make no changes, our approval is immediate.

*"Do you support Tufts University administration 1) apologizing for sending the former Tufts police chief to an intensive week-long course led by senior commanders in the Israel National Police, experts from Israel's intelligence and security services, and the Israeli Defense Force, 2) prohibiting TUPD officers from attending programs based on military strategies and/or similar international trips in the future, and 3) refining the vetting process to prevent prior attendees from being hired?"*

Once again, thank you for being so open to compromise throughout this process! Copied on this email are members of the CSL. Let us know should you have any further questions.

Best,  
TCU Judiciary



⬅️



Joshua David Washi...


Active now



NOV 20, 2020, 8:37 PM

Hey Joshua, I need you to take down the video you posted to Twitter IMMEDIATELY. This is not a joke. Massachusetts is a two-party consent state, and your recording is illegal. This is going to do significant damage if you don't remove the video immediately.


NOV 20, 2020, 10:06 PM



Hi Max. Thanks for letting me know. We're taking it down

You can now message and call each other and see info like Active Status and when you've seen messages.

Please let me know as soon as it's been deleted. Thanks



Already deleted



brutality in the US.

When I tried to respond they tried to silence me.

IBSI @ibsiNow · 6h

Tufts Students Silence Black Pro-Israel Activist youth... 64tU09YJI via @YouTube

4

11





Joshua Washington @JoshWashiBSI



Ashe. I have a question to ask and then





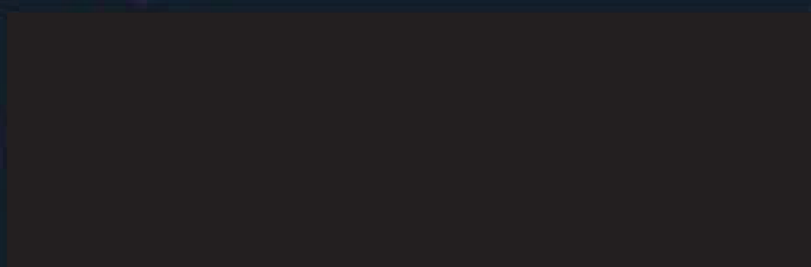
Joshua David Washi...

Active now



Still see it. Refreshed the page

This Tweet was deleted by the Tweet author.  
[Learn more](#)



...

Replying to @lbsiNow @HenMazzig and @YouTube  
@TuftsUniversity @TuftsHillel  
@melissaweiss @AdamMilstein  
@EranEfrati @RiteshVidhun  
@TuftsDaily @TuftsAlumni  
@StandWithUs

4:33 PM · 11/20/20 · [Twitter Web App](#)

4 Likes



It's been gone for almost 10 minutes now.

Video is still viewable from the link. Can you please take it down from YouTube as well?

I don't have access to that page. Video was taken by another group. Been trying to get a hold of them



Please give me the contact



Aa





12:37 ↗

EXHIBIT 20



**Joshua David Washi...**

Active now



NOV 21, 2020, 4:48 PM

The video is still up on youtube. It has now been 24 hours. Please let me know who to contact to have this video removed immediately.

This is unacceptable behavior for our side of the issue, not to mention illegal. I will again emphasize that the longer this video stays up, the more damage it will do for our shared cause.

NOV 21, 2020, 5:24 PM

Hey Max,

Sorry for the miscommunication. My digital team is working on taking the video down.

I appreciate your apology. As quickly as they can please. My reputation depends on it



Aa

