

EXHIBIT B

Students for Justice in Palestine (SJP) Complaint

JEWISHINSIDER

EXHIBIT B

Dear Members of the Tufts Community Union Senate,

This is an official written complaint against the TCU Judiciary 2020-2021 Members regarding a breach of Article III, Section D 4 a in the TCU Constitution.

We, members of the TCU, are writing to formalize a complaint about the TCU Judiciary and demand an investigation be done due to violation of the clause previously stated and ask for a disciplinary hearing for the Judiciary. We firmly believe that the TCU J has violated the clause by not recusing a member in the voting and process of the referendum proposed by Students for Justice in Palestine (SJP) in Fall 2020.

While no member in the TCU J is a member of SJP, there is a member in TCU J who has made explicitly biased statements against SJP and its campaign's efforts—thus, creating an environment where one cannot be objective on the referendum matter which required a binding vote. This member at large, Max Price has directly [condemned](#) the Deadly Exchange Campaign, [spoken to outside news outlets](#) about President Monaco's decision to condemn SJP's award for the collaboration award they received in Spring 2020, and holds a position as the Tufts Friends of Israel (FOI) [President](#), a group that was [heavily involved](#) in the creation of [Real Reform](#)—an opposition group to the referendum. Max conversed with SJP and asked SJP to change the wording of their referendum multiple times as he was biased under the facade of serving as a regular non-biased TCU Judiciary member.

Max should have been recused from participating in the referendum process for SJP since the beginning. This recusion request was not the responsibility of SJP but the TCU J as they are aware of their own constitution. However, even after SJP asked for Max to be recused, he refused. From the beginning, Max's lack of recusal made SJP's referendum process longer than usual, made SJP subject to more criticism than the TREE referendum received (TREES referendum was also approved before SJPs, even though they started their process after), put SJP in direct danger of being doxxed, and corruption in the student government.

Here are specific examples where the TCU J's violation of Article III Section D Clause 4A negatively impacted the referendum process:

On November 6, SJP presented four options for the referendums wording to the Judiciary. Both groups together revised and compromise on a potential referendum. The body met again independently to vote on it, and, without SJP present, voted against it due to "newly discovered misinformation" which SJP found out from a member of the TCU J, that it was Max who presented this information. SJP sent more resources and a detailed response refuting their claims, again asked TCU J to recuse Max after SJP members re-read the Constitution and found he should be recused, and asked them to reconsider.

SJP and TCU Judiciary members scheduled to meet on Wednesday to discuss. That evening, SJP had an event with Eran Efrati, a former IDF soldier and current director of Researching the American-Israeli Alliance (RAIA), who has now spent 10 years as an investigative researcher for

these trips. SJP members believed that Eran's insight would be particularly useful because SJP and the TCU J were going back and forth on the term "military-lead" and Eran's personal experience as an IDF soldier who has attended these delegations would be useful. SJP invited the Judiciary to this event to clear up their confusion, and when they specifically stated that they were not available during the set time of the event, SJP asked both parties if Eran could briefly join the Judiciary meeting before his event with SJP. SJP also requested that Max not be present at the meeting nor involved in influencing the opinions of other members of the J. In response, the TCU J emailed back stating that Eran's presence was reason for Max to be in attendance should be allowed to attend so it was fair game under the, "mutual understanding that bias should not be present."

However, the TCU J members then invited someone they considered to be a "fellow expert" to the meeting who violated exactly that understanding—exclusively espousing views based on bias against our campaign throughout the meeting that was irrelevant to the specific wording that the Judiciary was concerned with. SJP was not given advance notice of this person's attendance and background (see the attached email at 7:35, while SJP members were in the zoom waiting room since 7:30), as SJP would have in all likelihood refused to attend this meeting due to safety risks that often comes along with pro-Palestine organizing.

The TCU J's "expert," Joshua Washington, was unaware of the intent of the meeting, the context of the Judiciary's task in making the question "fair," and had not even seen our referendum questions prior to his attendance at the meeting. These facts indicate that Washington's attendance at this meeting was an unorganized final attempt to sabotage SJP's referendum. It is also clear Joshua Washington was sent the link last minute, meaning he could not have gone through the necessary process of registering with the University to attend the meeting. If he had, we are certain that the Allocations Board (ALBO) would have voted down his attendance because his [outspoken views against BLM](#) and the issue at hand mark him as both a seriously biased "expert" and a proud far-right advocate. Washington has no relevant experience or knowledge about the "counterterrorism" trainings in question, and is a music teacher by profession. His attendance at the meeting was unauthorized and dangerous as he has our names and faces now: immediately after the meeting, Mr. Washington took to social media to slander both SJP and the TCU, as seen in photos attached and released a video of the names and faces of students without their consent on YouTube, Twitter, and Facebook, which all Senators were forwarded and [this video](#) was recorded illegally without our consent. Dean Nandi Bynoe assisted SJP in removing the video in mid-November as it was illegally recorded and a huge breach of Student Government, but it was also recently posted to the Tufts Class of 2021 page after Mr. Washington re-posted it.

In this example, we have strong reason to believe this zoom bomb was organized by the same member of the Judiciary, Max, who has a conflict of interest as the Tufts Friends of Israel E-Board President and has made public statements condemning SJP and our campaign to End the Deadly Exchange. We also found out from another Judiciary member that Max sent the link to Joshua.

We strongly believe the Judiciary member who invited Joshua to zoom bomb and put SJP in danger should lose their seat and have more disciplinary actions taken towards them, because SJP was doxxed by right wing individuals online due to the fault of the Judiciary to not recuse this member in the beginning of the process. Furthermore, all other Judiciary members who agreed to be held accountable.

Second, the lack of recusal for Max led to corruption within the Judiciary. An opposition to our referendum called Real Reform At Tufts was created with information that only Max would have known-- including information about the public safety trip to Canada, which the J told us they requested from [REDACTED]; and the fact that signatures were collected before the final language was approved. Only ECOM and the J were aware of these things because ECOM was the group who approved SJP and TREE to collect their signatures before it was approved from the J (since they were taking a long time). Thus, only the J would be aware of the final language. Max also liked multiple posts and comments from this account. We strongly believe a member of a supposedly impartial body should not be aiding and helping to lead an opposition campaign to a referendum that they had the power to interfere with. Lastly, the Times of Israel (where Joshua Washington is employed) wrote in [this article](#) that the TCU President, [REDACTED], joined a J meeting she was uninvited to, which only Max or other members of the Judiciary present would have known and been able to leak to the website.

These examples clearly demonstrate that Max's refusal to officially recuse since the beginning, and fully recuse after we asked are a blatant violation of TCU J policy and TCU Constitution Article III Section 4 D A and led to corruption within the TCU student government. We ask that the Senate investigate our claims fully at their meeting this upcoming Sunday and vote on impeaching members of the J who are found to be in violation of the TCU Constitution.

Thank you for considering this request,
SJP

Attached are the relevant screenshots where we first ask for Max to be recused and what happened following.

[REDACTED] on behalf of TCU Judiciary

Fri 11/13/2020 5:25 PM

To:

Cc:

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



Re: Final Language for Referendum

Saturday, November 14, 2020 at 1:33 PM

To: TCU Judiciary; [REDACTED]

Cc: [REDACTED] +4 more

→ You forwarded this message on 11/14/20, 2:14 PM.

Show Forward

→ You forwarded this message on 11/18/20, 8:03 PM.

Show Forward

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 [REDACTED] 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.

All folders are up to date. Connected to: [REDACTED]



Re: Final Language for Referendum



[Redacted]

on behalf of

TCU Judiciary

Tuesday, November 17, 2020 at 12:45 AM

To:

[Redacted]

Cc:

[Redacted]

+7 more

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



Re: Final Language for Referendum



[Redacted]

Tuesday, November 17, 2020 at 12:05 PM

To: TCU Judiciary;

Cc:

[Redacted]

[Redacted]

+7 more

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 [Redacted] 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] 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



Re: Final Language for Referendum



[Redacted] on behalf of

Wednesday, November 18, 2020 at 4:53 PM

TCU Judiciary

To: [Redacted] Cc: [Redacted]

[+7 more](#)

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]

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

JEWISH INSIDER



November 18, 2020 at 5:32 PM

Re: Final Language for Referendum

To: TCU Judiciary

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



Re: Final Language for Referendum

on behalf of

Wednesday, November 18, 2020 at 6:43 PM

TCU Judiciary

To:

Cc:

[+7 more](#)

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

Wed 11/18/2020 7:04 PM

To: TCU Judiciary

Cc: [REDACTED] + 2 others

👍 ↶ ↷ ➡ ...

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

[REDACTED] on behalf of TCU Judiciary

Wed 11/18/2020 7:35 PM

To: [REDACTED]

Cc: [REDACTED] + 2 others

👍 ↶ ↷ ➡ ...

SJP,

Based on the necessity of having experts while remaining balanced to remove any disputable claims, we have invited Joshua Washington (a fellow expert on the topic) to attend our meeting at the same time as Eran. Additionally, Max Price has agreed to remain muted throughout the entire meeting with his camera on.



Joshua is a Black pro-Israel activist who was silenced by [Tufts University](#) student government and [Tufts Students for Justice in Palestine](#). Please share his post to expose Tufts' anti-Semitism.



Joshua David Washington

1h · 🌐

How rich is it that a [Tufts Students for Justice in Palestine](#) holds a last minute student government hearing on whether or not it's ok to sign off on a referend...

[See More](#)



 and 45 others

1 Comment 4 Shares



Like



Comment



Share



Joshua David Washington

1h · 🌐

How rich is it that a [Tufts Students for Justice in Palestine](#) holds a last minute student government hearing on whether or not it's ok to sign off on a referendum that essentially hijacks the black American experience?

Not as rich as them consistently speaking over the only black man in the meeting who had something to say about it.

[IBSI - Institute for Black Solidarity with Israel](#) will be over there soon. Believe that.

9148801

 and 11 others

1 Comment 11 Shares

Cha



Quote Tweets

Disgusting! @TuftsUniversity should stop their hate. @TuftsDaily @EranEfrati

You reported this Tweet.

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BDS Report @BDSreport · 1h



Tufts students silenced @JoshWash [REDACTED] when he tried to expose their racist and antisemitic #DeadlyExchange campaign.

@tuftsdaily

@tuftshillel

@ [REDACTED]

@ [REDACTED]

@ [REDACTED]

@TuftsHillel

@TuftsUniversity

@TuftsDaily

@Tuftssjp

@EranEfrati

You reported this Tweet.

View



Joshua Washington @JoshWashl... · 1h



@SJPtTufts let radical @ [REDACTED]