

Motion Sequence #3

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

In the Matter of,

AHMAD AWAD, SOFIA DADAP, SAPPHIRA  
LURIE, and JULIE NORRIS,

Petitioners,

-against-

FORDHAM UNIVERSITY,

Respondent,

For a Judgment Pursuant to Article 78  
of the Civil Practice Law and Rules.

Index No. 153826/2017

**AFFIDAVIT OF SOFIA DADAP  
IN SUPPORT OF  
PETITIONERS' MOTION FOR  
A PRELIMINARY INJUNCTION  
AND EXPEDITED DISCOVERY**

Hon. Nancy M. Bannon

STATE OF NEW YORK     )  
  ) ss:  
COUNTY OF NEW YORK    )

Sofia Dadap, being duly sworn, deposes and says:

1. I submit this Affidavit in support of Petitioners' Motion for a Preliminary Injunction and Expedited Discovery.

2. I am a senior at Fordham University and expect to graduate in May 2018.

3. I first became interested in Palestinian rights at the end of my sophomore year in Spring 2016 and began meeting with other students who were planning to form a club the following semester, in September 2016. As a Filipino-American with an understanding of the colonial history of my people, I identified with the Palestinian experience of military occupation and see all struggles against settler colonialism and white supremacy as inextricably connected. As a result, I became interested in forming Students for Justice in Palestine (SJP) so that I could

learn more about the movement for Palestinian rights. I then joined with other students in applying for official recognition of SJP, which would enable us to organize educational events for the Fordham community.

4. Over the next several months, I spent many hours with other students who were involved in the SJP application process. In the course of those months, I increasingly saw the role of SJP in raising awareness about the human rights abuses suffered by Palestinians, the dedication of the students to this issue, and the importance of being connected to a larger student movement. As a result, I became more committed to the formation of SJP so that I could join with others in raising awareness on campus about Palestinian rights. The name Students for Justice in Palestine also became important to me, as it conveyed an important political message, that is, being a part of the growing student movement for justice in Palestine. We are students who are for justice in Palestine and it is important that our name convey that political goal in a way that does not diminish the power of students, does not compromise on the principle of justice, and does not erase the narrative of Palestinians.

5. After Fordham denied our application for official club status in December 2016, I participated in this Article 78 proceeding both because I thought Fordham's decision was terribly unfair and because it interfered with my goal of helping to educate the Fordham community about the denial of Palestinian rights and its connection to other social justice issues.

6. Because SJP has not been officially recognized, I and other students interested in establishing a Fordham SJP have been unable—and will continue to be unable—to engage in a variety of activities that would have allowed the club to build support and attract members. For instance,

- a. We were unable to table at Fall Club Day on September 28, 2017. This is an activity where students with registered clubs may request a table in the Robert Moses Memorial Plaza to recruit new members for their organization. In addition to signing up new members, students tabling at Fall Club Day often hand out informational pamphlets, answer questions and advertise the club's activities. Because SJP is not a registered club, we were unable to participate in Club Day, recruit new members, hand out flyers or advertise events.
- b. We were unable to table at a club fair for high school seniors (the biggest high school event/open house of the year, from my understanding) at Fordham on October 14, 2017. Because SJP is not a registered club, we were unable to participate at this event, recruit new members, hand out flyers or advertise events.
- c. We cannot reserve rooms on campus for SJP meetings.
- d. We cannot distribute flyers, nor post literature on Fordham bulletin boards, announcing SJP activities.
- e. We cannot independently invite speakers to campus.
- f. We cannot apply to the United Student Government (USG) for funds to pay for any educational or cultural activities or to bring guest speakers to campus.

7. I would have liked to attend the National Students for Justice in Palestine (NSJP) conference in Houston, from October 27-29, 2017. NSJP is an independent organization that organizes conferences once a year "to connect and support" the movement for Palestinian rights. Student groups supporting Palestinian rights may attend workshops on building media skills, fundraising, free speech rights on campus and building effective campaigns. The conference also provides a unique opportunity to network with social justice activists across the country. If SJP

were a recognized student group, I would have applied for funding or used our club budget to attend the conference in Houston. It costs \$40 to attend the conference. I estimate that food, travel and lodging would cost a minimum of \$500. I would have loved to attend this conference but cannot afford to personally pay this amount.

8. If SJP were recognized, other students and I would organize events over the course of this academic year that would educate the Fordham community about Palestinian rights. I am interested in holding programs on environmental justice issues in Palestine such as clean water access, power shortages and destruction of olive groves. I am also interested in having an event on the history of Black-Palestinian solidarity, as well as screening films by Palestinian filmmakers. If SJP were recognized, I could reach out to other student organizations to collaborate on hosting these events.

9. However, since SJP's approval was vetoed, other students and organizations have been reluctant to participate in events supporting Palestinian rights because they are worried about administrative repercussions, including getting punished, sanctioned, defunded, or losing leadership positions or club status. The feeling is that, because of what happened with SJP, there is some possibility of retaliation if other clubs take up the Palestinian cause. By denying SJP club status, the Administration has stigmatized advocacy for Palestinian rights, to the point that even those students who were previously interested are reticent to publicly speak out for Palestinian rights.

10. I am concerned that Fordham's decision to overrule USG's approval of SJP will hurt my chances of finding a job when I graduate. If a potential employer googles me, they will find my name on the Canary Mission blacklist site with language on "the Fordham SJP Ban" and quotes from Eldredge's decision to deny club status to SJP. Canary Mission "publicize[s] the

identities of pro-Palestinian student activists to prevent them from getting jobs after they graduate from college.” Josh Nathan-Kazis, *Shadowy Website Creates Blacklist of Pro-Palestinian Activists*, THE FORWARD, May 27, 2015, <http://forward.com/news/308902/shadowy-web-site-creates-black-list-of-pro-palestinian-activists/>. If Fordham recognized SJP, it would show that I have institutional support for my human rights advocacy and have done nothing wrong.

11. I hope that this Court will reinstate the USG decision approving club recognition for SJP.

12. If SJP is not recognized soon, I will not have a chance to engage meaningfully on this issue on campus before I graduate.

*Sofia Dadap*  
Sofia Dadap

Sworn to me this 26<sup>th</sup> day of  
October, 2017

*Maria C. LaHood*  
Notary Public

MARIA C. LaHOOD, ESQ.  
Notary Public, State of New York  
No. 02LA6161980  
Qualified in Kings County  
Commission Expires February 26, 2019