



registration process described in the Club Registration Packet is clear that the United Student Government (USG) has the final authority to approve new student clubs.

4. On October 31, 2016, Leighton Magoon, then-president of USG, emailed me, Petitioner Awad, Petitioner Sofia Dadap and other students involved with establishing an SJP club at Fordham University, as well as our faculty advisor, Glenn Hendler. Mr. Magoon's email asserted that the club registration process that we and every other student group had been following (the process described in the Club Registration Packet) was wrong. In the body of the email, Mr. Magoon included text describing a different club registration process which, according to Mr. Magoon, was taken from a document called the "USG Club Guidelines." *See* Wenzel Affidavit Exhibit E at 1.


5. This was a surprise to us. We had never heard about or seen these USG Club Guidelines (or any portion of them) before receiving the October 31, 2016 email from Mr. Magoon. In fact, we never saw this full USG Club Guidelines document until Dr. Dorothy Wenzel included it as Exhibit A in her Affidavit accompanying Fordham's Motion to Dismiss. The only thing that we ever saw indicating that there was a club registration process other than the one we and every other student group had followed was the text in Mr. Magoon's email.

6. To be clear: no one ever showed us these USG Club Guidelines. Dr. Wenzel never showed them to us. Dean of Students Keith Eldredge never showed them to us. No member of USG showed them to us. All we saw was the portion of this USG Club Guidelines document that was included in the text of Mr. Magoon's October 31, 2016 email.

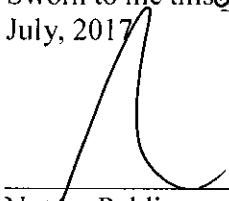
7. When I received the October 31, 2016 email from Mr. Magoon, I thought it was very odd that suddenly Fordham University was asserting, contrary to the process laid out in the Club Registration Packet and the process that everyone seemed to be following up until then, that

Dean Eldredge actually had final veto power after USG votes on whether or not to approve a new student club. After USG approved SJP as an official student club, Dean Eldredge relied on the process laid out in these USG Club Guidelines to veto USG's approval of SJP's club status. After his veto, I asked Kayla Wolf, Vice President of USG's Operations Committee, in writing whether "Dean Eldredge personally reviewed any other club in the same way as he did for SJP." Ms. Wolf's written response was "Dean Eldredge is made aware of all clubs coming down the pipeline but I am not aware of any other clubs that were personally reviewed the same way as SJP." Her email is attached hereto as Exhibit A.

8. I also asked Ms. Wolf whether Dean Eldredge "ever personally vetoed another club." Ms. Wolf's written response was, "As far as I am aware, Dean Eldredge has never personally vetoed another club." Ms. Wolf also wrote, "In my two years at Fordham and in USG, I do not know any other clubs that have been vetoed at Fordham Lincoln Center."

  
Sapphira Lurie

Sworn to me this 6<sup>th</sup> day of  
July, 2017



Notary Public

**ALEXIS AGATHOCLEOUS**  
Notary Public, State of New York  
No. 02AG6177956  
Qualified in Kings County  
Commission Expires November 19, 2019