

# **EXHIBIT B**

**UNREDACTED VERSIONS PROPOSED TO BE FILED  
UNDER SEAL**

**Declaration on behalf of Penn Carey Jewish Law Students Association**

We, [REDACTED] DECLARE as follows:

1. We are [REDACTED] at the University of Pennsylvania Carey Law School (“Penn Carey Law”).
2. We are [REDACTED] representatives of the Jewish Law Students Association (“JLSA”) at Penn Carey Law.
3. JLSA is a cultural, social, and non-denominational affinity group at Penn Carey Law that works to represent Jewish students and welcome students of all backgrounds and affiliations. JLSA’s mission is to build a vibrant community within Penn Carey Law by providing programming of Jewish cultural, religious, social, charitable, legal, and educational significance. The organization hosts Friday night dinners, social events, lunch and learn sessions, distinguished speakers, and other programs. JLSA seeks to develop an awareness within the campus community of legal issues relevant to the Jewish community and the role of Jewish ethics and values in the professional world. By offering engaging and meaningful programming and by connecting students with other Jewish organizations and alumni, JLSA hopes to contribute to the wellbeing of Jewish students at the Law School, the broader Penn community, and the Philadelphia Jewish community in which the group operates.
4. JLSA has serious reservations about the potential impact of a recent legal action filed on November 18, 2025, by the U.S. Equal Employment Opportunity Commission (“EEOC”) against the University of Pennsylvania. *U.S. Equal Employment Opportunity Commission v. The Trustees of the University of Pennsylvania*, 2:25-cv-06502 (E.D.Pa.).
5. EEOC’s subpoena requested that Penn “[p]roduce a list of all clubs, groups, organizations and recreation groups (hereinafter referred to as “organizations”) related to the Jewish religion, faith, ancestry/National Origin.” JLSA most certainly meets that definition.
6. The subpoena requested a “roster of organization members who are employees of Respondent,” and the personal contact information of both the organizations’ Point of Contact and all organization members identified as university employees. The subpoena

JLSA Declaration  
1/11/26

expressly encompasses "...other employees (including, but not limited to, students employed by the University)." (Parenthetical in original). Alarmingly, the subpoena went so far as to request student-employees' mailing addresses, in addition to other personal contact information.

7. Because we and many other JLSA members are or have been employed by the university, including as teaching assistants and research assistants, EEOC's request for information about Jewish employees and those associated with Jewish organizations would impact us and many other JLSA members directly.
8. JLSA and its members oppose Penn disclosing any information about them to the EEOC or any other government agency without their individual and voluntary consent. We object both to the wholesale disclosure of rosters of student-employees affiliated with JLSA and other Jewish organizations, and to the individual-level disclosure of contact information, including mailing addresses, phone numbers, and email addresses.
9. JLSA appreciates that EEOC takes past acts of campus antisemitism seriously and that it seeks to prevent future incidents. As a Jewish affinity group, JLSA and its members are deeply concerned about, and have struggled with, antisemitism, both generally and at Penn specifically.
10. JLSA does not object to the EEOC investigating antisemitism on campus. Rather, JLSA objects and thus seeks to intervene because of concerns about *how* the EEOC would conduct its antisemitism investigation.
11. JLSA strongly objects to EEOC (or any government agency) non-consensually obtaining personal information about individual Jewish affiliates of the university, and it likewise objects to any government agency compiling lists of Jewish community members. JLSA is concerned that non-consensual disclosure of information about Jewish student-employees to the EEOC will compromise Jewish safety, even if the EEOC's intention is to accomplish the laudable goal of combating antisemitism, which JLSA shares.
12. As members of the Jewish community, JLSA and its members appreciate the grave history of turning over lists of Jews to the government. Two generations removed from

JLSA Declaration  
1/11/26

the Holocaust, our community understands such disclosures are deeply frightening and profoundly dangerous. We ourselves are both descendants of Holocaust survivors. Earlier this month, for example, one of us spoke about the EEOC's subpoena with a family member who is a Holocaust survivor, and he expressed the concern that cataloguing Jews was something the Nazis did in the 20<sup>th</sup> Century in the lead up to the concentration camps.

13. The EEOC should investigate workplace antisemitism in a way that makes the Jewish community feel safe, rather than threatened. As an alternative to the EEOC subpoena, JLSA proposes having Penn distribute an EEOC complaint form to all members of the campus community so that every Jewish affiliate has the opportunity to voluntarily cooperate with the EEOC's investigation.
14. JLSA and its members do not want to be forced to intervene individually in this litigation. The time, expense, and potential exposure of members' identity and personal information are all obstacles to JLSA members intervening individually. If forced to intervene individually, the EEOC could potentially obtain much of the information it sought to obtain via subpoena, which would undermine the goal of intervening.
15. JLSA seeks intervention because even though Respondent University of Pennsylvania has thus far resisted disclosure of the subpoenaed student-employee information, the University's interests and calculus may change under pressure from the federal government, which has enormous leverage in the form of federal funding for research. Since it is Jewish student-employees whose information is sought by the EEOC, those of us with a direct interest in maintaining our privacy and affiliations need to have a voice in the final resolution of this matter.
16. Failure to permit JLSA's intervention could irreparably compromise our legal and constitutional rights to privacy, association, expression, and religious liberty. If people believe that membership in Jewish organizations could get them on a list turned over to a government agency, we fear people would be less likely to participate in Jewish community activities on campus.

JLSA Declaration  
1/11/26

17. We have requested that our attorneys submit this declaration with our identities under seal because we are afraid of the safety implications of having our names and contact information turned over to any party—never mind an entity as powerful as the government—merely because we are Jewish, especially given the rise in antisemitism in recent years and the tragic history of similar lists. We are also concerned because our personal information would be turned over to the government in the context of an adversarial court proceeding, which we fear could expose us to unfavorable repercussions—whether professional or otherwise.

We [REDACTED] hereby DECLARE under penalty of perjury on this 11th day of January, 2026, that the foregoing statements are true and correct to the best of our information, knowledge and belief, and that we are authorized to so represent by JLSA's governing body.

