



WISCONSIN INSTITUTE FOR LAW & LIBERTY, INC.
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www.will-law.org

May 2, 2024

Sent via the University of Wisconsin-Madison's Online Public Records Center

Re: Public Records Request Regarding the Pro-Hamas Occupation

Dear Public Records Custodians:

On behalf of the Wisconsin Institute for Law & Liberty, Inc., we write to request public records related to the involvement of public employees in the financing and coordination of an illegal occupation of public property. A response as soon as practicable and without delay is required by law.

Background

The Illegal Occupation of Public Property

Since at least April 29, anti-Israel protesters have unlawfully occupied a portion of the University of Wisconsin-Madison known as Library Mall or Memorial Mall. These individuals are currently violating the Wisconsin Administrative Code with a tent encampment, which has created both a public nuisance and an unsafe environment for members of the university's Jewish community. These members have been subjected to all sorts of harassment, including so-called "Heil Hitler" salutes.¹ Occupiers have even chanted: "There is only one solution, Intifada revolution!"² This chant is reminiscent of the Nazi's infamous "final solution," i.e., exterminating the Jews, and "Intifada" is an antisemitic call for violence.³ Chalk writings have been made in the courtyard of the mall, which state, among other things, "GLOBALIZE THE INTIFADA" and "ZIONISM IS TERRIORISM." Notably, chalking is also prohibited by the Wisconsin Administrative Code.⁴ The occupation has become violent—in one day alone, police arrested 34 people, and eight police

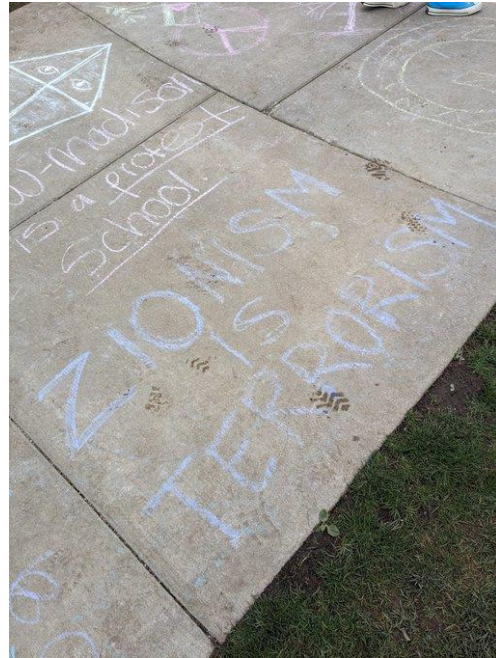
¹ <https://wislawjournal.com/2024/04/30/uw-madison-pro-palestine-protesters-spark-debate-over-free-speech-laws/>

² <https://x.com/CroySkylar/status/1785129008146821598>

³ <https://www.ajc.org/translatehate/Globalize-the-Intifada>

⁴ <https://guide.cfli.wisc.edu/documents/posting-chalking-and-leafletting/>

officers were injured.⁵ At least one police report has been filed, and we are closely monitoring the university's compliance with Title VI of the Civil Rights Act of 1964. This federal law requires universities to take affirmative steps to prohibit circumstances that create a racially hostile environment. The university's steps to date have only exacerbated this dangerous environment.



Public-Employee Fundraising

The occupation has been expensive. Among other things, occupiers have been bailed out of jail and provided with an extensive array of food, drinks, shelter, tables, and other materials.

Based on preliminary research, at least two professors have used their publicly funded workdays and public buildings to facilitate this illegal occupation. Specifically, these public employees have fundraised in support of the occupation and have done so on the taxpayers' dime. According to social media posts, Associate Professor Sami Schalk (who was arrested for her violent participation in the occupation)⁶ and Assistant Professor Kelly Marie Ward used Venmo, an app that facilitates fundraising, and similar apps to finance the occupation.

⁵ <https://www.jsonline.com/story/news/education/2024/05/01/protests-at-uw-madison-and-uw-milwaukee-go-to-third-day-live-updates/73519001007/>

⁶ https://www.yahoo.com/news/associate-professor-sami-schalk-arrested-140902269.html?guccounter=1&guce_referrer=aHR0cHM6Ly93d3cuZ29vZ2xlLmNvbS8&guce_referrer_sig=AQAAAIsZ9XuA5GKNkrt9grEGrpKPgt6X0VsOOBhnITvEO_myuVqjlsSzl7xdgHz6cmiDrchQnOm2ZgvtqhJWZ03ai0Aa5jJPU2mgQ3C-17twDyH0s9b0Gjp29DFMmd9jvzdV4f1PVv0TJwx4yTm2WrmkWIFrIgoYIjCuxpHKJsVczU1m



theguerrillafeminist and fierceblackfemme



Support UW-Madison Student Protesters!

All funds will be used to purchase
supplies and provide bail funds
(if needed) for protesters

PayPal: SamiSchalk
CashApp: \$SamiSchalk



Liked by briannastw and others

theguerrillafeminist Please share widely! Support UW-Madison Student Protesters! All funds will be used to purchase supplies and provide bail funds (if needed) for protesters. PayPal: SamiSchalk, CashApp: \$SamiSchalk, Venmo: Kelly-Ward-87

#uwmadison #freepalestine #madisonwi

2 days ago

← Post



Sami Schalk
@DrSamiSchalk

Subscribe

I just returned to my office after being at the first 2 hours of the [#FreePalestine](#) protest & encampment at UW-Madison. I am so proud of our students & am fundraising for protest supplies, bail funds (if needed). I'm @/\$ SamiSchalk on PayPal & CashApp respectively.

11:32 AM · 29 Apr 24 · 81K Views

245 Reposts 8 Quotes 1,021 Likes

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Sami Schalk @DrSamiSchalk · 3d

Replying to @DrSamiSchalk

If you only have Venmo please send to @Kelly-Ward-87!

2 7 33 3.3K

As seen above, Professor Schalk even posted on X during her regularly scheduled work hours.⁷ Professor Schalk's post is quite telling: while on campus (i.e., in her "office") and during the workday (11:32 AM on a Monday), she publicly declared that she is "fundraising for protest supplies" and "bail funds." She also made the post in her capacity as a professor, noting she is "proud" of her students.

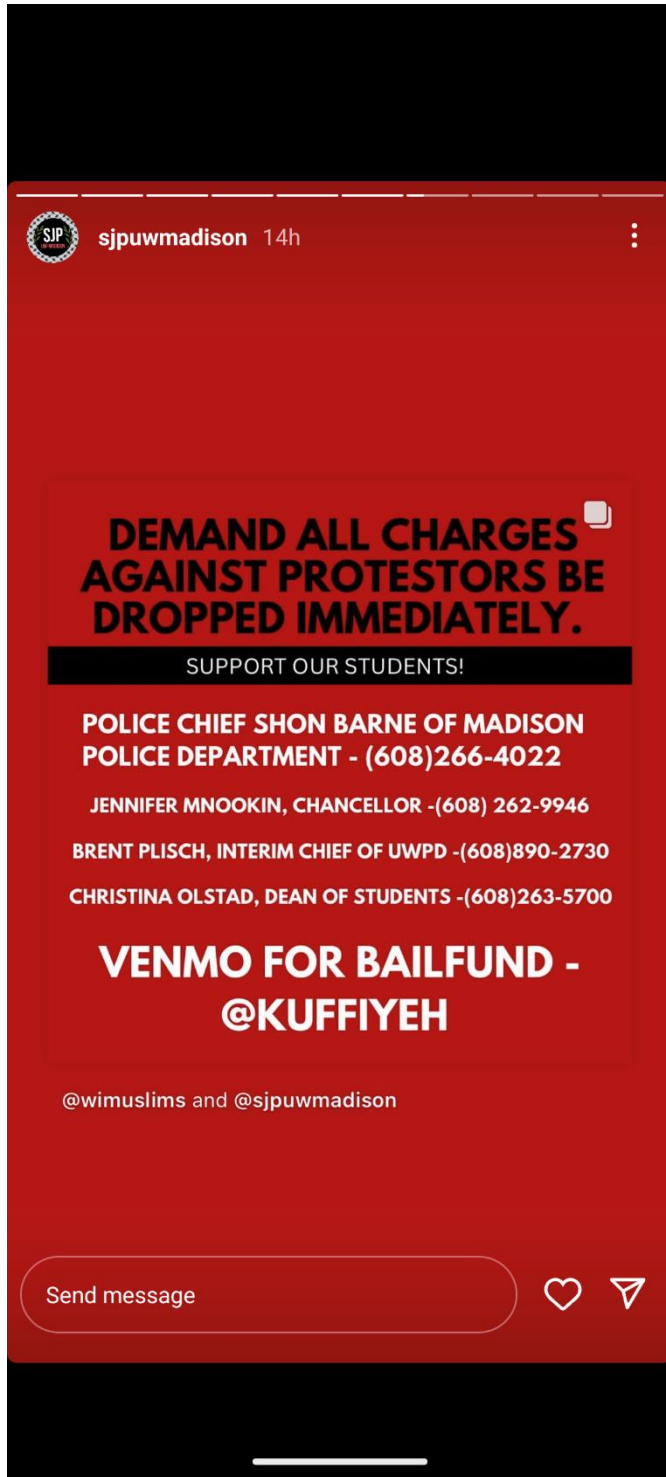
Additionally, Students for Justice in Palestine, a registered student organization, posted at various points on social media that it was fundraising to finance the illegal occupation, including for a so-called "bail fund." Fundraising is

⁷ <https://x.com/DrSamiSchalk/status/1784984210358309115>

strictly regulated by university policy, which states, among other things, that money received “may not be used for individual gain”⁸



⁸ <https://guide.cfli.wisc.edu/finances/>



Public Records Request

The public has a right to know how public employees use their time, especially when the employees are using it to finance an illegal occupation of public property.

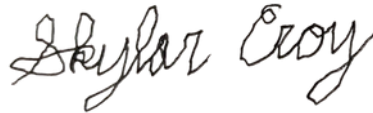
Accordingly, please provide the following:

- Records, including account history screenshots, reflecting fundraising for the occupation through any app such as Venmo used by Professor Schalk or Professor Ward since April 1, 2024.
- Any records possessed by Professor Schalk or Professor Ward documenting Students for Justice in Palestine's unsanctioned fundraising since April 1, 2024.
- Any emails, text messages (including messages sent via apps such as Signal), or other documents sent or received by Professor Schalk or Professor Ward about the occupation since April 1, 2024.

Sincerely,



Daniel P. Lennington
Deputy Counsel



Skylar Croy
Associate Counsel