



May 3, 2019

**VIA EMAIL**

Dr. Marlene Sandstrom, Dean of the College  
Mr. Douglas Schiazza, Director, Office of Student Life  
Mr. Mike R. Bodnarik, Associate Director, Office of Student Life  
Williams College  
889 Main Street, Hopkins Hall  
Williamstown, MA 02167

Dear Dean Sandstrom, Mr. Schiazza and Mr. Bodnarik:

We write on behalf of the Zionist Organization of America (ZOA), the oldest and one of the largest pro-Israel organizations in the U.S., whose mission includes fighting anti-Semitism and anti-Israel bias on college campuses. The ZOA led the successful fight to ensure that Jewish students would be protected under Title VI of the Civil Rights Act from anti-Semitic harassment and discrimination at federally-funded schools.

We were appalled to learn that the Williams College Council denied official recognition to a student group called Williams Initiative For Israel (WIFI). There is [no suggestion](#) that WIFI failed to follow the rules and regulations for becoming a registered student organization (RSO). WIFI apparently submitted its constitution and the requisite forms. The only reason it was denied official recognition – and will thus be deprived of the funding, administrative support and other benefits that RSO’s are entitled to – is because WIFI supports the Jewish state of Israel.

Equally troubling is how student representatives conducted themselves at College Council meetings with regard to WIFI’s application to become an RSO. At the April 16 meeting, a student actually challenged the notion that a club could be [“built on the assumption that Israel has a right to exist . . .”](#) This student’s comment was outrageous and anti-Semitic, not only according to the ZOA’s definition of anti-Semitism but also according to the [definition](#) used by the U.S. government and approximately 30 countries around the world. This definition makes it clear that denying the Jewish people their right to self-determination is anti-Semitic.

At the College Council’s April 23 meeting, WIFI members were [reportedly](#) “vilified by multiple speakers” who falsely accused Israel of “genocidal” and “apartheid” policies. WIFI members were denied the opportunity to refute these vicious lies – to explain that Israel is a democracy where all citizens have equal rights, that Arab-Israelis are in the Knesset, on the judiciary, and participate in all parts of society, and that the notion that there is a genocide is preposterous since the Arab population in Israel and the disputed territories is dramatically

increasing. WIFI members were also denied the opportunity to clarify the mission of their club so that students could accurately understand it.

### The College Council Violated the Code of Conduct

The College Council's decision to deny WIFI's application to become an RSO violates Williams College's policies, as well as the First Amendment rights of WIFI students.

The College's Code of Conduct makes it clear that "[\[s\]tudents are expected to respect the rights of others](#)" and that the College "[is committed to being a community in which all ranges of opinion and belief can be expressed and debated.](#)" By denying WIFI's application to become an RSO, the College Council violated the Code by seeking to silence those students who support the Jewish state of Israel.

### The College Council Violated the First Amendment

There is also a First Amendment imperative to ensure that the College Council's decision is overridden and that WIFI's application is granted. In *Board of Regents v. Southworth*, 529 U.S. 217 (2000), the U.S. Supreme Court considered a First Amendment challenge to a mandatory student fee imposed at the University of Wisconsin to support student organizations. The Supreme Court decided that the university could impose a mandatory student activities fee. But if it did, then the university had to satisfy the "viewpoint neutrality" requirement, i.e., it "may not prefer some viewpoints to others." *Id.* at 233. According to the Supreme Court, "the whole theory of viewpoint neutrality is that minority views are treated with the same respect as are majority views." *Id.* at 235.

Williams College [imposes](#) a mandatory student activities fee. It therefore must ensure that the viewpoint neutrality requirement is satisfied and that students' views in support of Israel are accepted and welcomed.

We understand that Williams College is a private, not a public institution, and thus is not directly bound by the First Amendment which limits only government action. But since the College has held itself out as a bastion of free thought and expression, we are confident that it would be held to the same standards under the First Amendment as a public institution and would be required to comply with the viewpoint neutrality requirement in the allocation of its mandatory student fees.

### The Necessary Action Steps

For all these reasons, we urge you to take the following steps right away:

- Override the College Council's decision and recognize WIFI as an RSO, consistent with your authority under Williams' policies; and
- Issue a statement to the Williams community (1) condemning the actions of the College Council and the wrongful, anti-Semitic conduct of speakers at the College Council meetings on April 16 and 23; and (2) explaining the reasons why you are overriding the College Council's decision, so that the College Council and the rest of the community

will understand that Williams College truly stands behind its commitment to the “rights of all to express themselves in words and actions.”

We look forward to hearing from you and would be pleased to work with you to ensure that Williams College is a safe, welcoming and respectful place for all students, including those who love and support the State of Israel.

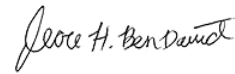
Very truly yours,



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