



June 25, 2026

Eric M. Wilcots
Office of the Chancellor
University of Wisconsin - Madison
163 Bascom Hall
500 Lincoln Drive
Madison, Wisconsin 53706

URGENT

Sent via U.S. Mail and Electronic Mail (chancellor@wisc.edu)

Dear Chancellor Wilcots:

FIRE, a nonpartisan nonprofit that defends free speech,¹ is concerned by the University of Wisconsin-Madison's investigation of Animal Advocacy, a registered student organization, for hanging fliers with a QR code linking to animal rights advocacy information. While some may have disagreed with the group's message or found it controversial, the fliers do not fall into a category of speech unprotected by the First Amendment, which bars UW-Madison from investigating or punishing Animal Advocacy's protected expression. We urge UW-Madison to immediately end its investigation of Animal Advocacy's fliers and refrain from imposing any sanctions on the group.

On April 13, student members of Animal Advocacy hung fliers on campus that read "Help Save 2,000 Beagles, Return to Ridglan Farms, April 19th, 2026, Scan the QR code or visit savethedogs.io" and featured a photo of two people holding a beagle wrapped in a towel.² The flier's caption about a "return" to Ridglan Farms referenced an upcoming protest at Ridglan Farms, a Wisconsin breeder of dogs for experimentation. Outside activists and other animal groups had planned the protest as a follow-up to a previous March 15 dog "open rescue" attempt.³ The flier also included a QR code linking to a Google document titled "Help Save 2,000

¹ For more than 25 years, FIRE has defended free expression and other individual rights on America's university campuses. You can learn more about our mission and activities at fire.org.

² "Help Save 2,000 Beagles" flier (on file with author). On April 14, Animal Advocacy members hung another set of fliers around campus, advertising a scheduled campus speaking event with animal rights activist Zoe Rosenberg on April 16. This letter will only address UW-Madison's investigation of the "Help Save 2,000 Beagles" flier. The recitation of facts here reflects our understanding of the pertinent information. We appreciate that you may have additional information and invite you to share it with us.

³ *Id.*

Beagles!!”⁴ The Google document contained information about the previous “rescue” via a break-in at Ridglan Farms, and linked to additional websites and resources for people to learn more and get involved.⁵ With regard to the latter, the Google document included a list of traditional grassroots advocacy steps, such as joining the student group, signing a petition, donating funds, sharing information on social media, and contacting lawmakers and licensing agencies about animal welfare concerns.⁶

On April 20, the president of Animal Advocacy, student Jackson Ray, received an email from the Interim Director of the Office for Student Investigations, Leadership & Involvement, Barb Kautz-Wittwer, warning the group that their “Help Save 2,000 Beagles” flier appeared to be “soliciting or encouraging individuals to participate in criminal activity.”⁷ She explained that because the flier contained a QR code linking to a Google document, which in turn linked to an outside activist’s blog post that allegedly referenced entering Ridglan Farms and removing dogs from the property, the group was promoting what she determined to be “illegal activity.”⁸ Though she stated that the university “underst[ood] that no criminal behavior has occurred,” she warned that “continu[ing] to promote activities that are encouraging criminal acts” could result in consequences.⁹

On May 13, Ray received an email¹⁰ from Gretchen Vollrath, Investigative Officer with the Office of Student Conduct and Community Standards, notifying him that an investigation had been opened into Animal Advocacy because administrators received reports alleging that members had “solicited others to enter Ridglan Farms and remove animals from the property on or before April 19, 2026.”¹¹ Specifically, the group was being investigated for potential violations of the Registered Student Organization Code of Conduct, including Rule 3 – “Violation of Law: Conduct that could constitute a violation of any local, state, or federal law.”¹² Vollrath alleged that the “Help Save 2,000 Beagles” fliers were in violation of Wisconsin’s state

⁴ “*Help Save 2,000 Beagles!!*” Google document, available at: https://docs.google.com/document/d/15FUVMizhOnRNP6fFbHzwbJnwXjanw6OBZ4i_N5oORTU/edit?tab=t.0 (on file with author).

⁵ *Id.*

⁶ *Id.*

⁷ Email from Barb Kautz-Wittwer, Interim Director of the Office for Student Investigations, Leadership & Involvement, to Jackson Ray, student (April 17, 2026, 4:07 PM) (on file with author).

⁸ *Id.* The QR code on the “Help Save 2,000 Beagles” linked to the “*Help Save 2,000!!*” Google document, which included a line that read: “More Information Here: <https://blog.simpleheart.org/p/this-is-the-new-plan-to-save-the>” along with a hyperlink to prominent animal rights activist Wayne Hsiung’s March 21 blog about the dog rescue activity that took place at Ridglan Farms. “*Help Save 2,000 Beagles!!*”, *supra* note 4.

⁹ Kautz-Wittmer, *supra* note 7. Kautz-Wittmer also warned Ray that in his role as a student organization leader, he was expected to “take reasonable steps to ensure activities, communications, and advocacy efforts conducted by or promoted on behalf of [his] organization align with university policies and remain within the bounds of the law.”

¹⁰ Email from Gretchen Vollrath, Investigative Officer, to Ray (May 13, 2026, 9:05 AM) (on file with author).

¹¹ Letter from Gretchen Vollrath, Investigative Officer, to Ray (May 13, 2026) (on file with author).

¹² *Id.*; Registered Student Organization Code of Conduct, UNIV. OF WISCONSIN-MADISON, <https://policy.wisc.edu/library/UW-2002> [<https://perma.cc/WME8-JMS2>].

criminal laws on solicitation to commit burglary and solicitation to commit the unauthorized release of animals.¹³

Our primary concerns arise from UW-Madison’s contention that it may punish Animal Advocacy based on the content of the “Help Save 2000 Beagles” fliers. As a public institution, UW-Madison is legally bound to comply with the First Amendment regarding campus expression, which protects student speech on campus, including speech that administrators or community members may view as controversial, political, provocative, or offensive.¹⁴ The university may punish expression only if it falls within one of the narrow, well-defined categories of speech unprotected by the First Amendment, such as defamation, true threats, and incitement.¹⁵ Of these “well-defined and narrowly limited classes of speech,”¹⁶ the category most relevant to this matter is incitement, but the flier does not come close to satisfying that demanding standard.

To constitute incitement, speech must “specifically advocate for listeners to take unlawful action,” be “directed to inciting or producing imminent lawless action *and* ... [be] likely to incite or produce such action.”¹⁷ Here, the “Help Save 2,000 Beagles” fliers and linked Google document do not include *any* exhortation or direction to readers to engage in lawless action. Indeed, they do the opposite, educating people about animal welfare issues at Ridgland Farms and providing them with a long list of *legal* ways to advocate for the animals. The fact that the group referred to the March 15 incident and an upcoming protest at Ridgland Farms, and included a link to another animal rights activist’s account of his involvement, does not amount to the group inciting readers to themselves engage in lawless action.¹⁸ Encouraging people to learn more about an issue or merely attend a protest is not the same as the group telling people to break the law or engage in criminal tactics while at that protest.

Even if one did read the flier or Google document as advocating that readers attend the protest and break the law, such speech can meet the incitement standard only where it is intended to and likely to result in *imminent* lawless activity. The “mere *advocacy* of the use of force or

¹³ Vollrath, *supra* note 11.

¹⁴ *Healy v. James*, 408 U.S. 169, 180 (1972) (“[T]he precedents of this Court leave no room for the view that, because of the acknowledged need for order, First Amendment protections should apply with less force on college campuses than in the community at large. Quite to the contrary, ‘the vigilant protection of constitutional freedoms is nowhere more vital than in the community of American schools.’”) (internal citation omitted).

¹⁵ *United States v. Stevens*, 559 U.S. 460, 468–69 (2010) (quoting, in part, *Simon & Schuster, Inc. v. Members of N. Y. State Crime Victims Bd.*, 502 U.S. 105, 127 (1991)).

¹⁶ *Chaplinsky v. New Hampshire*, 315 U.S. 568, 574 (1942).

¹⁷ *Brandenburg v. Ohio*, 395 U.S. 444, 447–48 (1969) (incitement is speech advocating violence that is both intended and likely to produce imminent lawless action by others); *see also Cox v. Louisiana*, 379 U.S. 536, 557 (1965) (fears that “muttering” and “grumbling” white onlookers might resort to violence did not justify dispersal of civil rights marchers).

¹⁸ *See, e.g., Nwanguma v. Trump*, 903 F.3d 604, 609–10 (6th Cir. 2018) (then-candidate Trump’s repeated “get ‘em out of here” statements concerning protesters to a crowd at a rally did not constitute specific advocacy of violence, even if the statements could be understood as encouraging violence).

violence does not remove speech from the protection of the First Amendment.”¹⁹ Even a hypothetical assertion of the “moral propriety or even moral necessity for a resort to force or violence”—action far more extreme than the break-in or rescue described here—remains protected speech.²⁰

As part of our nation’s strong protection for political speech, the First Amendment does not permit government agencies like state universities to transform what is fundamentally political advocacy into unlawful incitement merely because that advocacy is forceful or unpopular.²¹ Political rhetoric often uses urgent, moral, and confrontational language. That the university may view the message as controversial, inflammatory, or “inciting” in the colloquial sense is not enough to remove it from constitutional protection. The “Help Save 2,000 Beagles” flier and corresponding Google document fall well within any reasonable understanding of core political advocacy and are protected by both the First Amendment²² and university policy.²³

We request a substantive response to this letter no later than July 9, confirming that UW-Madison will promptly end its investigation of Animal Advocacy’s protected expression and refrain from imposing any disciplinary sanctions on the group.

Sincerely,



Amanda Nordstrom
Strategic Campaigns Counsel, Campus Rights Advocacy

Cc: Renee Wachter, President

¹⁹ *NAACP v. Claiborne Hardware Co.*, 458 U.S. 886, 927 (1982) (emphasis in original); see also *Watts v. United States*, 394 U.S. 705, 708 (1969) (man’s statement, after being drafted to serve in the Vietnam War—“If they ever make me carry a rifle the first man I want to get in my sights is L. B. J.”—was rhetorical hyperbole protected by the First Amendment, not a true threat to kill the president).

²⁰ *Noto v. United States*, 367 U.S. 290, 297–98 (1961).

²¹ See *Buckley v. Am. Constitutional Law Found.*, 525 U.S. 182, 186–87 (1999) (quoting *Meyer v. Grant*, 486 U.S. 414, 425 (1988)) (establishing that “core political speech” is where the First Amendment’s protection is “at its zenith”).

²² *Meyer*, 486 U.S. at 425 (holding that political speech is “an area in which the importance of First Amendment protections is at its zenith”) (internal citations omitted); see also, e.g., *Snyder v. Phelps*, 562 U.S. 443, 451–52 (2011) (“Speech on matters of public concern is at the heart of the First Amendment’s protection.”) (cleaned up).

²³ *Values Statement: University’s Mission*, UNIV. OF WIS.-MADISON, <https://free-expression.wisc.edu/> [<https://perma.cc/49EZ-EN5C>].