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TO: Washington State University Faculty Status Committee

Co-Chairs

Robert Rosenman,

Economic Sciences

Greg Matthews

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RE: Complaint of Academic Freedom Violations

DATE: April 27, 2017

This complaint is submitted by Dr. Robert Wielgus, Professor and Director of the Large Carnivore Conservation Laboratory (“Lab”), through his undersigned counsel against the Washington State University (“WSU” or “University”) and President Kirk Schulz, as well as Dean Ron Mittelhammer and Associate Dean James Moyer of the College of Agricultural, Human, and Natural Resource Sciences (“College of Agriculture”). Dr. Wielgus alleges that WSU has engaged in conduct that has restricted his academic freedom and freedom of speech in contravention of the University’s own Faculty Manual.

This complaint urges the Faculty Status Committee to investigate the wrongful retaliatory actions against Dr. Wielgus in violation of WSU’s academic freedom guarantees by the University and the College of Agriculture and to recommend disciplinary and other ameliorative action.

Due to a pattern and practice of University suppression, condemnation, discipline, and reprisal concerning the presentation of his wolf/livestock research, the academic career of Dr. Wielgus has been seriously damaged and he has suffered physical, social, emotional, and financial hardships. Dr. Wielgus has previously attempted to resolve this matter internally with the College of Agriculture, however, these efforts were to no avail. Ultimately, Dr. Wielgus would prefer to resolve this matter amicably and expeditiously rather than through litigation.

Summary of Violations

President Kirk Schulz, Dean Ron Mittelhammer, and Associate Dean Jim Moyer have infringed upon the academic freedom of Dr. Wielgus in the following ways:

1. Reprimands and demands of silence concerning wolf research and outreach by Associate Dean James Moyer.
2. Approval of unprecedented funding restrictions to the Lab by President Schulz and the College of Agriculture, which denied Dr. Wielgus summer funding and grant money for field research and conferences related to that research.
3. Issuance of an inaccurate University Press Release, without consultation with Dr. Wielgus, which wrongfully denounced him as a liar.
4. Suppression of communications by Dean Mittelhammer through an order that Dr. Wielgus and the Lab speak to neither the press nor public about wolves again.
5. Placement of suppressive requirements on Dr. Wielgus and the Lab by Dean Mittelhammer; requiring direct submission of all scientific papers and presentations to the Dean for vetting and revision before publication.
6. Issuance of a Sept. 13, 2016 memorandum of concern by Dean Mittelhammer reprimanding Dr. Wielgus for comments to the press.
7. Issuance of a March 28, 2017 memorandum of concern by Dean Mittelhammer reprimanding Dr. Wielgus for distribution of a personal press release to the Wolf Advisory Group and wrongfully suggesting that Dr. Wielgus' public statements were illegal.
8. Initiation of an erroneous, and arguably malicious, investigation of lobbying illegally.
9. Initiation of an erroneous, and arguably malicious, investigation of illegal use of state resources.
10. Erroneous public denunciation of Dr. Wielgus for political lobbying by Dean Mittelhammer during a meeting of the Wolf Advisory Group.

I. Dr. Wielgus' Research and Statements on Profanity Peak Incident

Dr. Robert Wielgus is a WSU full professor and director of the Large Carnivore Conservation Lab. His research has focused on large-scale, long-term field experiments examining the effects of human disturbance on population, habitat, and community ecology of large carnivores and their prey in the eastern Washington area. This work led to the 2013 appointment of Dr. Wielgus as the Program Leader for wolf/livestock research & extension in Washington by the State Legislature.

As a leading researcher in the field of large carnivore interactions, Dr. Wielgus has been recognized as a national expert in the field of livestock depredation by wolves and his work has been pivotal in the reintroduction of the previously federally endangered Gray Wolf (*Canis*

lupus) to eastern Washington. His research has been considered in the drafting and implementation of the Washington Department of Fish and Wildlife (“WDFW”) “Gray Wolf Conservation and Management Plan” and he has been an ongoing advisor to the State’s Wolf Advisory Group.

This complaint revolves around two public statements Dr. Wielgus made concerning his research in this area, which led to the actions that are challenged here.

The first public statement involved an August 2016 interview for a news piece by the *Seattle Times* concerning a recent eradication of the gray wolf pack at Profanity Peak by WDFW. In the resulting article,¹ citing his research on lethal control of wolves, Dr. Wielgus was critical of the failure of the rancher whose livestock losses were the justification for the pack’s eradication to follow adequate animal husbandry techniques to prevent depredation and his refusal to cooperate with the WDFW or Lab in implementing measures to avoid wildlife/livestock confrontations.

The second public statement was made to the Wolf Advisory Group in March of 2017. Dr. Wielgus sought to provide information and data to the Wolf Advisory Group, as he was tasked by the Legislature. As instructed by Dean Mittelhammer, Dr. Wielgus wrote and rewrote his official statement with the help of the WSU College of Agriculture Media Affairs Office and received authorization for the release of the written statement directly from Dean Mittelhammer. With WSU approval, Dr. Wielgus then distributed this statement to interested parties within the Wolf Advisory Group on March 27, 2017.

As detailed below, both of these statements triggered official censure and retaliation in violation of the academic freedom guarantees laid out in the WSU Faculty Manual.

II. Academic Freedom Guaranteed to WSU Faculty

The Washington State University Faculty Manual states that it is the policy of WSU to “support and promote the rights of all individuals to express their view and opinions for or against actions or ideas in which they have an interest”; these rights apply to members of the university community regardless of their professional stature and/or *the acceptability of those views among others*.² Moreover, it is vital that the University recall that “[w]hen [professors] speak or write *as citizens*, they should be free from institutional censorship or discipline...” and the faculty, including deans and ranking officials, “*should be accurate, should exercise appropriate restraint, should show respect for the opinions of others...*”³ Lastly, it is vital that

¹ “Profanity Peak wolf pack in state’s gun sights after rancher turns out cattle on den”, Lynda Mapes, *Seattle Time*, August 25, 2016. Available at: <http://www.seattletimes.com/seattle-news/environment/profanity-peak-wolf-pack-in-states-gun-sights-after-rancher-turns-out-cattle-on-den/>

² Washington State University Faculty Manual, Board of Regents (Sept. 16, 2016) https://facsen.wsu.edu/faculty_manual/Faculty_Manual_09.16.16.BOR%20APPROVED.Final.pdf at 15 (emphasis added).

³ *Id.* (emphasis added).

“[t]he policies and procedures of WSU should allow the expertise of University faculty and staff to be available to society...”⁴

As described below, there is no reasonable way to reconcile the conduct of the named WSU administrators with these requirements and provisions. Indeed, the actions undertaken appear to be in flagrant violation of these principles.

III. Political Pressure on WSU Officials

The actions of WSU administrators appear to be a response to the political pressure brought to bear on them during the past four years.

In 2013, the Washington State Legislature directed and funded a scientific research investigation and outreach program led by Dr. Wielgus concerning wolf/livestock conflicts. This program engaged in state-wide outreach with livestock organizations and had initially shown promise and cooperation with area ranchers. However, bothered by the ramifications of the program’s work, State Representative Joel Kretz, Republican from the 7th District and rancher himself, contacted the WSU College of Agriculture to complain about Dr. Wielgus’s program, as well as his recently published peer-reviewed scientific data on cougar predation of livestock. James Moyer (WSU College of Agriculture, Director of Research) then met with Dr. Wielgus and indicated that he was on a very short rope and that he and the Lab should be very careful of what they say or do. Director Moyer made it abundantly clear that Dr. Wielgus was considered a political target of Rep. Kretz, the livestock industry, and possibly the WSU College of Agriculture.

In 2014, Dr. Wielgus began field research on wolf predation of livestock, during which time a severe depredation event occurred involving the Huckleberry wolf pack. Following the lethal control efforts of the wolf pack by the WDFW against the recommendations of wildlife biologists, Governor Inslee requested that Dr. Wielgus come to his office to provide clarification concerning rampant inconsistencies in the reports issued by WDFW compared to those of others involved. Dr. Wielgus then briefed the Governor’s Office and the WSU administration on the facts of this depredation and lethal control event, and also submitted his legislative report to the State Legislature. In his reports, Dr. Wielgus highlighted the misrepresentations made by WDFW in their documentation surrounding the lethal control event. As a result, WDFW management sought to cease funding the WSU wolf livestock research program and to transfer its funding to another university. Due to these conflicting reports and attempts to divert research funding away from the Lab, a number of WDFW management resigned from their positions.

⁴ *Id.* at 74. “The policies and procedures of WSU should allow the expertise of University faculty and staff to be available to society without interfering with University programs or academic freedom, and without leading to conflict of interest.”

IV. Recent Instances of Improper Academic Infringement

1. Associate Dean's Threats

Throughout the past several years of Dr. Wielgus's involvement with the Wolf Advisory Group, he has received recurring reprimands and threats from the WSU administration. After making the initial outreach efforts for his state-sponsored wolf depredation working group, Dr. Wielgus was implicitly threatened by Director Moyer, through a direct warning that Dr. Wielgus was a political target of Rep. Kretz and the livestock industry, and possibly an enemy of his own WSU College of Agriculture.

2. Unprecedented Funding Restrictions

In 2015, following presentation of the Lab's wolf/livestock research results to the Legislature, Rep. Kretz reiterated to former President Floyd that his express goal was to shut down the Lab and stop its research. In later budget negotiations, Rep. Kretz managed to insert a "Legislative Rider" on the State House Proviso that ultimately funded Dr. Wielgus's research program. The "rider" stipulated that the funds would be disbursed to the WDFW, then transferred to the Washington Cooperative Fish and Wildlife Research Unit, and then to the Lab at WSU; this deal was inconsistent with the existing 4 year research contract established in 2013. In this way and contrary to normal procedure, the University could withhold credit for Dr. Wielgus – as director – for obtaining the grant, cut his summer research salary (2 months out of the year), and prohibit use of grant funds for any "personal" costs (*e.g.*, travel to meetings, conferences, legislative and WDFW briefings, etc.).

The WSU and its College of Agriculture agreed to this unprecedented restriction of a scientist's budget through a verbal agreement with Rep. Kretz and WDFW, effectively attempting to curtail the involvement of Dr. Wielgus in wolf conservation research during summer months – prime grazing season.

Following the 2016 Profanity Peak incident, funding for large carnivore studies has been diverted from the Lab to the University of Washington, including removal of continued funding for research that was already underway. This action by WSU officials has served to effectively shut down the Lab.

3. Censure and False Statements

In the summer of 2016, a major depredation event occurred by the Profanity Peak wolf pack and Dr. Wielgus's Lab team documented that the rancher, Len McIrvin of the Diamond M Ranch, did not sign and/or abide by the WDFW Cooperative Damage Agreement. The rancher had refused to practice normal preventative animal husbandry, including placing salt blocks used to attract cattle at the den site and leaving them there until after lethal control had begun. Furthermore, this was the second pack of wolves (of 3 total statewide) that Mr. McIrvin had requested WDFW kill due to his inadequate animal husbandry practices. As he had done for the depredation event of 2014, Dr. Wielgus reported his findings to Donny Martorello (Wolf Policy Lead for WDFW) who on behalf of the Dept., once again, misrepresented the facts to the Wolf Advisory Group, the media, and the State Legislature.

Following this event, Dr. Wielgus was contacted by the *Seattle Times* for clarification and comment in a news article about WDFW's lethal control of the Profanity Peak wolf pack. Immediately after the publication of the article, Rep. Kretz contacted new WSU President Schulz and demanded a public denouncement of Dr. Wielgus. This resulted in the August 31, 2016 University Press Releases which, without prior consultation with Dr. Wielgus, wrongfully denounced him as a liar and stated that Dr. Wielgus's comments concerning lethal control of wolves "have been both inaccurate and inappropriate" and "are disavowed by our institutions."

Mr. Martorello of DFWW contacted Dr. Wielgus and admitted to providing the information used in the WSU press release; however, when WSU requested to make this a joint press release with WDFW, Mr. Martorello refused.

Rather than consult with Dr. Wielgus or provide clarifying remarks for perceived minor inaccuracies in Dr. Wielgus's statements to the *Seattle Times*, the University's press release made blanket statements insinuating total falsehood and disavowing Dr. Wielgus's scientific opinions.⁶ To flatly state that Dr. Wielgus's remarks in this article were wholly inaccurate is not only misleading, but outright untrue.

In its follow-up with the *Seattle Times*, WSU expressly stated that Dr. Wielgus's comments concerning whether rancher Len McIrvin grazed his cattle "on top of" the Profanity Peak wolf den were wholly inaccurate and disavowed them. However, while rancher Len McIrvin did release his cattle to graze 4 miles away as WSU noted, he had willfully installed salt blocks meant to lure and entice grazing cattle within 200 yards of the Profanity Peak's den – a den site location that was well-known among the WDFW, county commission, and numerous ranchers in the area – and subsequently elected not to remove them even after a number of cattle had been attacked by wolves. By purposefully installing salt block attractants for cattle near the den's location, though not physically releasing them there, McIrvin did indeed "elect to put his livestock" near the den site, as this grazing range consisted of over 30,000 acres – more than ample room to avoid the known den site. This is further evidenced by the fact that this is the second such wolf den eradication at the hands of Mr. McIrvin, as his ranch had requested lethal control of the Wedge Pack in 2012 as well;⁷ a vital fact that the University failed to acknowledge in its response. Of the three lethal control operations undertaken by WDFW since the Gray Wolf's reintroduction to Washington, two have been at Mr. McIrvin's request. Thus, Dr. Wielgus's statement of "[t]his livestock operator elected to put his livestock directly on top of their den site" is basically accurate, rather than wholly inaccurate and without merit as reported by WSU to the press.

Additionally, the University issued a blanket denial of Dr. Wielgus's assessment that no collared livestock were killed by wolves, which was deceptive and seemingly purposefully

⁵ "WSU issues statement clarifying comments on wolf pack." WSU News, Aug. 31, 2016. Available at <https://news.wsu.edu/2016/08/31/ws-u-issues-statement-clarifying-comments-profanity-peak-wolf-pack/>

⁶ *Ibid.*

⁷ "Elimination of wolf pack took a toll," Nicholas Geranios, *Seattle Times*, Oct. 6, 2012, <http://www.seattletimes.com/seattle-news/elimination-of-wolf-pack-took-a-toll/>

discrediting. Despite WSU's claim that this statement by Dr. Wielgus lacked any credibility, the data in the later March 27, 2017 Press Release by Dr. Wielgus demonstrated otherwise: "Using intensive radio-telemetry of livestock overlapping wolf home ranges: among 11 different cooperating herds studied over 2 years - **zero** of 764 radio-tagged livestock were killed by wolves. Among this sample of cooperating ranchers, less than 1% of estimated livestock losses were due to wolf depredations."⁸ This data supports Dr. Wielgus's conclusion in the original article, and if any inaccuracy was perceived by the University, a correction with the assistance of Dr. Wielgus was warranted – not a reckless disavowal and discrediting.

The University's response to *Seattle Times* also pulls a sleight of hand when it claims to rebut Dr. Wielgus's statement that Mr. McIrvin failed to cooperate with the Lab or WDFW. WDFW has conceded that Mr. McIrvin elected not to cooperate with WSU or follow the full extent of what is recommended by the WDFW Damage Control Agreements. However, WSU's correction to the *Seattle Times* instead portrayed McIrvin as following some protocols to deter wolves without acknowledging that he had willfully disregarded numerous other measures vital to the avoidance of wolf/livestock conflicts as recommended by the WDFW.

Furthermore, Dr. Wielgus's research empirically demonstrates that Mr. McIrvin's failure to abide by recommendations of WDFW's Damage Control Agreements or to employ sufficient avoidance measures resulted in abnormally high levels of depredations by the Profanity Peak pack compared to the remainder of the 15 wolf packs studied by Dr. Wielgus.⁹

It was especially disappointing to Dr. Wielgus that WSU would employ such condemnatory language to the press regarding one of its acclaimed professors when a clarification (if needed) would have sufficed. Moreover, the university's actions served to punish a faculty member for carrying out what the Faculty Manual states is his primary responsibility, "to seek and to state the truth *as they see it*."¹⁰

4. *Improper Gag Order*

Following the issuance of the University's August 31, 2016 Press Release, Dean Mittelhammer directed Dr. Wielgus and the Lab staff not to talk to the press or public about wolves again. This has served to suppress the dissemination of research related to large carnivores in eastern Washington and has violated the University's policy that "the expertise of University faculty and staff [should] be available to society..."¹¹

⁸ *Press Release: Wolf livestock depredations in WA & Profanity Peak Pack*, Dr. Robert Wielgus, March 27, 2017

⁹ *Id.* ("9 of 15 packs had zero wolf livestock kills at 444 kill sites and 3 of 15 packs had < 5% livestock kills. For the remaining 3 packs with more than 5% kills, one had 16% and another had 23% - and sheep comprised most of these kills. The Profanity Peak pack had 67% livestock kills.")

¹⁰ WSU Faculty Manual, at 15 (emphasis added).

¹¹ *Id.* at 74.

5. Restriction of Publication of Research

At this same time, Dean Mittelhammer placed a requirement upon Dr. Wielgus and the Lab to submit all scientific papers and presentations directly to the Dean for vetting and revision before publication. This restriction violates the Faculty Manual's direction that "teachers are entitled to full freedom in research and in the publication of the results."¹² It has served to place an administrative filter on all large carnivore research produced by the University and has restricted the academic freedoms of the Lab's researchers.

6. Retaliatory Issuance of Two Memoranda of Concern

Since providing commentary for the *Seattle Times* article, Dr. Wielgus has been subject to disciplinary action in the form of two memoranda of concern related to his comments discussing wolf depredation. These memoranda state that the points made by Dr. Wielgus "were made without an objective factual basis," despite the release of data to support Dr. Wielgus's conclusions concerning wolf depredation, as described above. Furthermore, these memoranda of concern contained implicit threats of disciplinary action should Dr. Wielgus seek to refute the College of Agriculture's claims that his statements concerning Profanity Peak had "no basis in fact." In these letters, Dean Mittelhammer also threatened further disciplinary action related to investigations of lobbying activity and improper use of state resources, stating that he "will be requesting that WSU further review [Dr. Wielgus's] communications to determine whether university policies and/or state laws related to lobbying and the use of public resources for private purposes are implicated. Pending the outcome of that review, further actions relating to this situation may occur."¹³

7. Wrongful Investigation of Lobbying

After receiving approval from Dean Mittelhammer concerning the content of his March 27, 2017 press release and including of a disclaimer stating that he spoke in his capacity as a private citizen, Dr. Wielgus distributed his empirical findings to members of the Wolf Advisory Group, which included officials of the WDFW, ranchers, researchers, and other interested parties. The press release recommended "WDFW, the WAG, and ranchers in Washington to sign, and/or abide by the terms of the WDFW Cooperative Damage Prevention Agreements to reduce wolf livestock depredations." In response to this recommendation, the University alleged illegal lobbying activity by Dr. Wielgus because of his use of a wsu.edu email address in the release of this recommendation. This accusation is wholly without merit.

According to the Washington Code, "Lobby" and "Lobbying" mean attempting to influence the passage or defeat of any *legislation* by the *state legislature*, or the adoption or rejection of any rule, standard, rate, or other *legislative enactment* of any state agency under the

¹² *Id.* at 14.

¹³ March 28, 2017 Letter of Concern, Dean Ron Mittelhammer.

state administrative procedure act (Ch. 34.05 RCW).¹⁴ Furthermore, under the Washington Code “legislation” refers to “*bills, resolutions, motions, amendments, nominations, and other matters pending or proposed* in either house of the state legislature, and includes *any other matter that may be the subject of action* by either house or any committee of the legislature and all bills and resolutions that, *having passed both houses, are pending approval* by the governor.”¹⁵

It is clear that the distribution of this press release from Dr. Wielgus’s university email address was not an instance of lobbying, as alleged by Dean Mittelhammer. First, this press release was intended as an unbiased publication of research data sent to parties involved in wolf conservation, a group with whom Dr. Wielgus had been working for several years. Second, this communication did not seek to persuade the state legislature or a state agency to adopt or reject any “rule, standard, rate, or other legislative enactment”; rather it provided information in a clear format for a working group that had solicited his advice in the past. Third, the content of his suggested actions contained no recommendations for additional legislative measures; they merely recommended adherence to existing protocols and a suggestion (to an advisory group to which he belonged) of a method to incentivize non-lethal preventative measures.

Absolutely nothing within his communication would indicate a direct attempt at lobbying with state resources and it can only be surmised that Dean Mittelhammer was either ignorant of lobbying definitions or intentionally using unsupportable accusations to intimidate Mr. Wielgus.

8. Wrongful Accusations of Improper Use of State Resources

Dean Mittelhammer’s March 28, 2017 memorandum of concern also noted his request for an investigation into Dr. Wielgus’s alleged violation of university policy and/or state law concerning improper use of state resources. However, nothing within the WSU Faculty Manual, WAC 292-110-010, or BPPM 20.37, specifically restricts the use of university email for the distribution of an unbiased research publication to interested parties of a professional working group to which the author is a member. In addition, even if such a restriction did exist, it would not apply here because Dr. Wielgus’s use of his University email to distribute a personal statement would be considered *de minimis* under both state law and University policy.¹⁶

9. More Erroneous Censure

On March 29, 2017, Dean Mittelhammer attended the meeting of the Wolf Advisory Group and publically denounced Dr. Wielgus for illegal use of state resources and illegal political lobbying in the issuance of his written statement, due to the inclusion of Dr. Wielgus’s

¹⁴ Rev. Code Wash. (ARCW) § 42.17A.005 (30) (emphasis added).

¹⁵ Rev. Code Wash. (ARCW) § 42.17A.005 (28) (emphasis added).

¹⁶ Under WAC 292-110-010(3), use of state resources are “de minimis” if: (i) There is little or no cost to the state; (ii) Any use is brief; (iii) Any use occurs infrequently; (iv) The use does not interfere with the performance of any state officer’s or employee’s official duties; (v) The use does not compromise the security or integrity of state property, information systems, or software; (vi) The use is not for the purpose of conducting an outside business in furtherance of private employment, or to realize a private financial gain; AND (vii) The use is not for supporting, promoting the interests of, or soliciting for outside organization or group. *See also*, BPPM 20.37.

university email address as his point of contact. This public character assassination has been used to further unwarranted investigations into the Dean's accusations against Dr. Wielgus and to discredit the results of his research and outreach efforts.¹⁷

V. Conclusion

The University has clearly violated a plethora of internal policies and procedures in its dealings with Dr. Wielgus over the past few years and has blatantly infringed upon his academic freedom. President Schulz, Dean Mittelhammer, Director Moyer, and the College of Agriculture have failed to respect the scientific opinions of the Lab as they relate to lethal control of wolves in eastern Washington and have subjected Dr. Wielgus to institutional suppression and discipline for conclusions based upon his own research concerning wolf management. Moreover, the College of Agriculture has restricted the societal use of faculty expertise through its suppression of Dr. Wielgus's communications with the press and public, effectively halting the public use of state-sponsored comprehensive research into endangered carnivore species.

These wrongful administrative actions have caused severe professional and financial harm to Dr. Wielgus. First, after 20 years of consistently obtaining ample grant funding for large carnivore research, those funds have now been redirected to University of Washington, due to character assassination within WSU's retaliatory press release. Second, the actions of the administration have served as a public humiliation for Dr. Wielgus and have resulted in ostracism from the WSU community. Third, because of the loss of his summer funding and benefits, Dr. Wielgus has faced financial hardships in paying for his home (resulting in its necessary sale) and in paying for his daughters' college tuitions.

Furthermore, these malicious administrative actions have caused Dr. Wielgus severe stress and stress-related symptoms, including anxiety attacks, severe depression, high blood pressure, gastrointestinal problems, vertigo, and early symptoms of a heart attack. Additionally, Dr. Wielgus's blanket disavowal by the University has resulted in verbal attacks, vilification, and threats by right-wing politicians, livestock lobbyists, and anti-wolf organizations and individuals. These threats have left Dr. Wielgus concerned about possible violent attacks and have resulted in his inability to travel freely in eastern Washington and northern Idaho, requiring him to conceal his identity whenever possible.

VI. Requested Relief

Dr. Wielgus has attempted to resolve this manner internally with Dean Mittelhammer of the College of Agriculture, as per University policy, but all attempts have fallen upon deaf ears. To redress these violations and avert litigation, Dr. Wielgus requests that WSU engage in the following corrective actions:

1. The issuance of a retraction of the University's original August 31, 2016 press release concerning the *Seattle Times* article and issuance of a new press release drafted by Dr. Wielgus correcting the errors within WSU's August 31, 2016 press release;

¹⁷ See March 28, 2017 Memorandum of Concern, Dean Don Mittelhammer.

2. The retraction of the September 13, 2016 and the March 28, 2017 memos of concern issued to Dr. Wielgus;
3. University publication of the March 27, 2017 Press Release written by Dr. Wielgus;
4. Appropriate disciplinary action against President Schulz, Dean Mittelhammer, and Associate Dean James Moyer over retaliatory actions taken in violation of WSU academic freedom guarantees;
5. Cessation of any investigations into improper use of state resources and illegal lobbying efforts by Dr. Wielgus;
6. Reimbursement for the four months' salary (two months for each year) that has been expressly withheld from Dr. Wielgus in the 2016 and 2017 summer research grants for the Large Carnivore Conservation Laboratory; and
7. Review of improper political influence on President Schulz and the College of Agriculture in connection with this matter.

We hope to reach an amicable solution in a timely manner. Please let me know to whom I should send any additional information and/or copies of referenced documents.

Thank you for your prompt attention to this matter.

Sincerely,



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