

# COVINGTON

BEIJING BRUSSELS LONDON LOS ANGELES  
NEW YORK SAN FRANCISCO SEOUL  
SHANGHAI SILICON VALLEY WASHINGTON

Stephen Kiehl

Covington & Burling LLP  
One CityCenter  
850 Tenth Street, NW  
Washington, DC 20001-4956  
T +1 202 662 5872  
skiehl@cov.com

## By Electronic Mail

November 4, 2016

Amber Duffey  
Assistant Director for Student Organizations and Governance  
Student Involvement  
The Hub, Suite 2300  
George Mason University  
aduffey3@gmu.edu

Thomas M. Moncure, Jr.  
University Counsel & Assistant Attorney General  
George Mason University  
4400 University Dr.  
Fairfax, VA 22030  
tmoncure@gmu.edu

## Re: Christians United for Israel Panel Discussion

Dear Ms. Duffey and Mr. Moncure:

The undersigned law firm represents CUFI on Campus, the campus division of Christians United for Israel, and I write in reference to a panel discussion planned for November 5, 2016 by the CUFI on Campus chapter at George Mason University.

CUFI has planned a panel discussion titled “Confronting Hate and Extremism: A Discussion on the BDS Movement,” and has reserved space on campus in the Johnson Center, as is its right as a student organization at GMU.

However, on the eve of the event, CUFI’s GMU chapter president, Cammie Wires, was informed by Ms. Duffey that all panelists must fill out a “No Pay Agreement,” which is described as a “Memorandum for Appointment of Voluntary Work.” When asked to explain this requirement, Ms. Duffey stated in an email to Ms. Wires that “it is a new process and it is still being figured out completely so nothing is published yet.”

CUFI is puzzled by the imposition of this unpublished rule on speakers it has already lined up for its event. Indeed, the “No Pay Agreement” appears to cover volunteer work and asks for information wholly unrelated to a speaker on campus, such as “job tasks” and “supervisor(s) name” and “position.” It also requires the signature of a “Department Supervisor,” which is clearly inapplicable to a speaker who has been invited on campus by a recognized student organization.

**COVINGTON**

Amber Duffey  
Thomas M. Moncure, Jr.  
November 4, 2016

Page 2

The Virginia Administrative Code provides that “George Mason University facilities are intended primarily for the use of its students, faculty, and staff in their efforts to advance the educational mission of the university.” 8 Va. Admin. Code § 35-31-20. CUFI’s event seeks to foster discussion on the debates surrounding Israel, and is in keeping with the university’s mission advancing knowledge and education.

Furthermore, nothing in the university’s policies require student group-invited speakers to fill out a “voluntary work” form prior to being able to share their message with students. We trust none of CUFI’s invited speakers will be required to complete this arbitrary form and the event will proceed as scheduled.

Please do not hesitate to contact me if you wish to discuss this matter further.

Sincerely,

A handwritten signature in blue ink, appearing to read "S. Kiehl", written in a cursive style.

Stephen Kiehl