



September 4, 2025

Mun Y. Choi  
Office of the President  
University of Missouri  
105 Jesse Hall  
Columbia, Missouri 65211

*Sent via U.S. Mail and Electronic Mail (president@missouri.edu)*

Dear President Choi:

FIRE<sup>1</sup> is concerned by the University of Missouri's cancellation of the Legion of Black Collegians' "Black 2 Class Block Party" based on the event's name. FIRE appreciates that Mizzou is one of the few institutions in the country whose policies earn a "green light" rating from FIRE, and we have engaged in repeated and productive collaboration on policy reform with the University of Missouri System's Office of the General Counsel. However, Mizzou may not, consistent with the First Amendment, restrict use of campus facilities to LBC merely because the name of its planned event references a racial or cultural group. We urge Mizzou to publicly assure LBC that the group is welcome to use racial or cultural signifiers in the names of its campus events in the future, including hosting the "Black 2 Class Block Party" next year.

On August 20, the Legion of Black Collegians, an umbrella organization for Black students at Mizzou, announced on social media that the university had canceled the group's "Black 2 Class Block Party" scheduled for August 22 because of the word "Black" in the event's name.<sup>2</sup> According to LBC, the group offered to change the name of the event to "Back 2 Class Block Party," but the university declined.<sup>3</sup> The event was open to everyone.<sup>4</sup>

In a statement to news media, Mizzou said it "fosters a non-discriminatory campus environment. When holding events using university facilities, student organizations must avoid excluding individuals based on race. The event had already been promoted with a name

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<sup>1</sup> As you likely recall from recent correspondence, FIRE is a nonpartisan nonprofit that defends free speech. You can learn more about our mission and activities at [thefire.org](https://thefire.org).

<sup>2</sup> Legion of Black Collegians (@mizzoulbc), INSTAGRAM (Aug. 20, 2025), [https://www.instagram.com/p/DNlOsxsRW98/?utm\\_source=ig\\_web\\_copy\\_link&img\\_index=3](https://www.instagram.com/p/DNlOsxsRW98/?utm_source=ig_web_copy_link&img_index=3). The recitation here reflects our understanding of the pertinent facts. We appreciate that you may have additional information and invite you to share it with us.

<sup>3</sup> *Id.*; Cecelia Koparanyan, *Black student group meets with MU over cancellation of event due to name*, ST. LOUIS PUB. RADIO (Aug. 22, 2025, 12:37 PM), <https://www.stlpr.org/education/2025-08-22/black-student-group-meets-with-mu-over-cancellation-of-event-due-to-name>.

<sup>4</sup> Koparanyan, *supra* note 3.

that suggested such exclusivity. For that reason, the decision was made that the event as described would not be held on campus.”<sup>5</sup>

This is not the first time Mizzou has objected to the name of LBC events. Last year, the university changed the name of LBC’s “Welcome Black BBQ” to “Welcome Black and Gold BBQ,” a reference to the school’s colors.<sup>6</sup> According to LBC, the university told the group at the time that it could plan a similar event “to restore that lost piece of tradition in the [BBQ’s] name.”<sup>7</sup> Thus, the group planned the “Black 2 Class Block Party” for this year.<sup>8</sup>

In response to the cancellation, LBC demanded the university publicly condemn racial harassment, hold a town hall within 60 days to discuss “cultural identity and climate issues on campus,” and mandate campus-wide messaging on harassment policies.<sup>9</sup> In a comment on LBC’s Instagram post, the official university account shared the text of an email you sent to LBC leadership, in which you told the group that the university “will not respond to demands,” but said university officials “will meet with LBC leaders to continue the discussion.”<sup>10</sup>

On August 21, members of LBC’s executive board met with you and several other university officials to discuss the situation. According to LBC President Amaya Morgan, the conversation was not productive as the university maintained the event name was exclusionary, while LBC maintained “that is never what we do as the Legion of Black Collegians. It is literally in our constitution that we are open to all types of identities.”<sup>11</sup>

Mizzou’s cancellation of the “Black 2 Class Block Party” due to objections over the event name raises serious constitutional concerns. As a public university, Mizzou’s policies governing student organizations and the use of campus facilities must comply with the First Amendment, which protects students’ rights to expressive and associational freedom.<sup>12</sup> Once the university

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<sup>5</sup> Koparanyan, *supra* note 3.

<sup>6</sup> Jessica Blake, *Mizzou Calls Black 2 Class Event Example of Discrimination*, INSIDE HIGHER ED. (Aug. 21, 2025), <https://www.insidehighered.com/news/students/diversity/2025/08/21/mizzou-calls-black-2-class-event-discrimination>.

<sup>7</sup> Legion of Black Collegians, *supra* note 2.

<sup>8</sup> *Id.*

<sup>9</sup> *Id.*

<sup>10</sup> Reply from Mizzou (@mizzou) to Legion of Black Collegians, *supra* note 2.

<sup>11</sup> Koparanyan, *supra* note 3.

<sup>12</sup> *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).

has opened campus spaces for use by student organizations and the general public,<sup>13</sup> it may not then exclude some groups based on the content or viewpoint of their protected expression.<sup>14</sup>

Yet that is precisely what Mizzou did here by canceling the “Black 2 Class Block Party” based on its name. No one has alleged that the event organizers were actually excluding people of any race or color. The university acknowledged that it canceled the event merely because its name “suggested it was race exclusive.”<sup>15</sup> But the name of the event does not indicate that the event is limited to Black people any more than the names of the annual “Lebanese Festival” in St. Louis,<sup>16</sup> or the “German-American Festival” in Toledo, Ohio,<sup>17</sup> mean that only Lebanese or German-American people are welcome or expected to attend. In other words, Mizzou canceled the block party not because anything about the event conflicted with campus policy but solely because the message it erroneously inferred from the use of the word “Black” in its name—and then refused to allow the event even after LBC offered to change the supposedly problematic name.

Prohibiting use of campus facilities for events that use the word “Black” (or other racial or ethnic classifications) in their event names imposes speech restrictions specifically on Black and other race- or ethnicity-based organizations and events that do not apply to event organizers interested in different topics. This does not prevent Mizzou from stepping in regarding events that are, or explicitly purport to be, racially exclusive. But the university’s interest in avoiding even unreasonable perceptions that an event on campus is racially exclusive is not sufficiently compelling to justify discrimination against race- and ethnicity-based student organizations.<sup>18</sup>

Nor can Mizzou legitimately claim that it may prohibit students from hosting events on campus out of concern that the views expressed at the event or by the event name might be attributed to the university. The Supreme Court has repeatedly held that mere use of a public university’s facilities by a student group—on the same basis in which the facilities are made available to all student groups—does not commit the university to the particular group’s views.<sup>19</sup>

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<sup>13</sup> The Gaines/Oldham Black Culture Center, the space reserved by LBC for the Black 2 Class Block Party, is available for use by student organizations, university departments, as well as the general public, subject only to “GOBCC staffing and space availability.” *Gaines/Oldham Black Culture Center Reservation Policy and Terms & Conditions*, UNIV. OF MO. (revised Sept. 2017), <https://gobcc.missouri.edu/wp-content/uploads/2017/09/GOBCC-Reservation-Policy-and-Terms-Conditions-2017.pdf> [<https://perma.cc/K8EG-4XJ8>]. By opening up the GOBCC to the general public, Mizzou has established a designated public forum. *See Spectrum WT v. Wendler*, --- F.4th ---, 2025 WL 2388306, at \*8 (5th Cir. Aug. 18, 2025).

<sup>14</sup> *Christian Legal Soc’y Ch. of the Univ. of Cal., Hastings Coll. of Law v. Martinez*, 561 U.S. 661, 679 n. 11 (2010) (content and viewpoint-based restrictions on speech in a designated public forum are subject to strict scrutiny).

<sup>15</sup> Blake, *supra* note 5.

<sup>16</sup> *See* St Louis Lebanese Festival at St. Raymonds, FACEBOOK (Sept. 23, 2022), <https://www.facebook.com/share/p/175bCN6koh/>.

<sup>17</sup> *See* German-American Festival, <https://www.germanamericanfestival.org/> [<https://perma.cc/2S58-XEU7>].

<sup>18</sup> *Martinez*, 561 U.S. at 685 (“The school’s interest ‘in maintaining strict separation of church and State’ ... was not ‘sufficiently compelling to justify viewpoint discrimination against religious speech.’”) (cleaned up).

<sup>19</sup> *Widmar v. Vincent*, 454 U.S. 263, 274 (1981); *see also Bd. of Regents of the Univ. of Wis. Sys. v. Southworth*, 529 U.S. 217, 229 (2000) (expressive activities of student organizations at public university, funded by

We request a substantive response to this letter no later than September 11 confirming Mizzou will publicly assure LBC that it may host events on campus with “Black” in the event name in the future.

Sincerely,



Jessie Appleby  
Program Counsel, Campus Rights Advocacy

Cc: Mark A. Menghini, General Counsel  
Mark Allan Van Zandt, Senior Counsel

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mandatory student activity fees, were not speech by the institution); *Rosenberger v. Rector & Visitors of the Univ. of Va.*, 515 U.S. 819, 841 (1995) (where university adhered to viewpoint neutrality in administering student fee program, student religious publication funded by fee was not speech on behalf of university). While universities may reasonably have cause for concern if a group is holding out an event as an official university event—or implying as much—that is not the case here.