



February 26, 2026

Spotsylvania County Public School Board  
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Dear Members of the Board:

The Foundation for Individual Rights and Expression (FIRE), a nonpartisan nonprofit that defends free speech nationwide, is concerned by the Spotsylvania County Public School Board’s censorship of a citizen who satirized the school district’s diversity, equity, and inclusion (DEI) policies and its handling of a former bus aide’s sexual abuse of special-needs students. By cutting off Shamgar Connors’ remarks during the public comment period of Board meetings, removing him from a meeting, and issuing an eight-month no-trespass order barring him from future meetings and district property, the Board violated his constitutional rights. The First Amendment does not permit government officials to silence critics simply because it finds their criticism distasteful or offensive. The Board must immediately rescind the no-trespass order and ensure its policies comply with the First Amendment on paper and in practice.

**I. Removal from Meeting and Subsequent Ban**

Shamgar Connors regularly attends and speaks during the public comment period of Board meetings. In his remarks, Connors frequently uses satire and parody to criticize Spotsylvania County Public Schools’ policies and actions.

At the May 12, 2025, meeting, Connors performed a short rap criticizing critical race theory and the district’s DEI initiatives and accusing the district of hiring “pedophiles.”<sup>1</sup> Board Chair Megan Jackson gavelled him down before the end of his allotted time, stating, “You need to

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<sup>1</sup> *Spotsylvania School Board 5-12-2025*, SPOTSYLVANIA CNTY. SCH. BD., <https://www.regionalwebtv.com/spotsysb> (video starting at 1:27:10).

leave. We are not discussing pedophiles.” Before leaving the podium, Connors retorted, “You hired them,” referring to a former district bus aide who sexually abused special-needs students.

On October 13, 2025, Connors again spoke during public comment.<sup>2</sup> By that time, the bus aide had pled guilty to 13 counts of sexual assault.<sup>3</sup> Connors alleged the district failed to conduct an adequate background check, declined to authorize a third-party audit, and allowed the aide to continue working after allegations surfaced. As part of his commentary, Connors adopted a mock persona and used satirical language to criticize what he characterized as DEI-driven hiring practices, which he blamed for the district’s failure to prevent the aide’s abuse of students. Near the end of his remarks, Connors sang a brief “mariachi” parody song that included the line, “Ay, Miguel, on the bus with hands full of sin, diddling kids in wheelchairs, let the nightmare begin. DEI hire. No background check.” At that point, Chair Jackson gaveled him down and cut off his microphone, accusing him of engaging in “mocking” and “racist rhetoric.”

After a brief verbal exchange with Jackson, Connors returned to his seat in the audience, and Jackson called a five-minute recess. Although Connors was speaking at normal conversational volume with individuals seated nearby and not addressing any Board members, Chair Jackson told the district’s Director of School Safety and Risk Management to ask Connors to leave the meeting. Connors asserted he had a right to remain. A sheriff’s deputy then approached, and Connors agreed to leave the building without further incident.<sup>4</sup>

By letter dated November 7, 2025, Chair Jackson informed Connors that Spotsylvania County Public Schools was issuing a “No Trespassing Order” prohibiting him from attending Board meetings or otherwise accessing district property until July 1, 2026.<sup>5</sup> The letter alleged that Connors’ October 13 remarks and conduct violated the Board’s decorum policy (which prohibits speech that “causes disruption to the meeting” or “contains lewd, profane, or obscene language”), policies barring disruption or interruption of school functions, and state and local disorderly conduct laws. The letter specifically called out Connors’ lyric, “Ay, Miguel, on the bus with hands full of sin, diddling kids in wheelchairs,” characterizing it as an “obscene depiction of child molestation in parody” that “disrupted the decorum of the school board meeting.” The letter also cited Connors’ refusal to leave immediately when told to do so and noted that he had previously been issued a warning letter dated June 11, 2025, for “similar disruptive behavior” at the May 12 meeting.<sup>6</sup>

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<sup>2</sup> *Spotsylvania School Board 10-13-2025*, SPOTSYLVANIA CNTY. SCH. BD., <https://www.regionalwebtv.com/spotsysb> (video starting at 1:10:10).

<sup>3</sup> Julie Carey, *School bus attendant gets 48 years for sex assault of special needs students*, NBC4 WASH. (Nov. 21, 2025), <https://www.nbcwashington.com/news/local/northern-virginia/school-bus-attendant-gets-48-years-for-sex-assault-of-special-needs-students/4019403>.

<sup>4</sup> *COPS KICK OUT TRANS-ILLEGAL (me) at Spotsylvania School Board during Hispanic heritage! (RACIST)*, Shamgar Connors, the ICON (Oct. 22, 2025), YOUTUBE, <https://youtu.be/PYrd4FwdnEg?si=mXfJDXJUzbFVOJJK&t=391>.

<sup>5</sup> Letter from Megan Jackson, Sch. Bd. Chair, Spotsylvania Cnty. Pub. Schs., to Shamgar Connors, Nov. 7, 2025 (on file with author).

<sup>6</sup> Connors denies ever having received this letter.

## II. The Board’s Viewpoint-Based Censorship Violates the First Amendment

Chair Jackson’s decision to terminate Connors’ remarks during the October 13 public comment period violated the First Amendment. By cutting off his speech based on its mocking and critical nature, rather than any actual disruption of the meeting, the chair engaged in impermissible viewpoint discrimination.

The First Amendment protects speech by members of the public at government meetings.<sup>7</sup> Public comment periods by their nature are, at minimum, limited public forums, which means any speech restrictions must be viewpoint-neutral *and* reasonable in light of the forum’s purpose.<sup>8</sup> The Board may, for example, adopt reasonable time limits on comments and prohibit true threats.<sup>9</sup> But it may not restrict comments “when the specific motivating ideology or the opinion or perspective of the speaker is the rationale for the restriction.”<sup>10</sup> As federal courts across the country have made clear, this principle means that officials may not restrict public comments on the grounds they are “antagonistic,” “abusive,” “vile,” “derogatory,” “offensive,” “inappropriate,” or “personally directed.”<sup>11</sup> It is a “bedrock principle underlying the First Amendment” that officials cannot restrict speech simply because some find it “offensive or disagreeable,”<sup>12</sup> including parodies that are “doubtless gross and repugnant in the eyes of most.”<sup>13</sup> Such restrictions are viewpoint-discriminatory,<sup>14</sup> which makes them

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<sup>7</sup> *City of Madison, Joint Sch. Dist. No. 8 v. Wisc. Emp. Rels. Comm’n*, 429 U.S. 167, 174–76 (1976) (recognizing public’s right to speak at school board meetings “when the board sits in public meetings to conduct public business and hear the views of citizens”).

<sup>8</sup> *See Rosenberger v. Rector & Visitors of Univ. of Virginia*, 515 U.S. 819, 829 (1995).

<sup>9</sup> True threats, which are “serious expressions conveying that a speaker means to commit an act of unlawful violence,” are outside the First Amendment’s protection. *Counterman v. Colorado*, 600 U.S. 66, 74 (2023) (cleaned up).

<sup>10</sup> *Rosenberger*, 515 U.S. at 829.

<sup>11</sup> *See, e.g., Moms for Liberty – Brevard County v. Brevard County Public Schools*, 118 F.4th 1324 (11th Cir. 2024) (enforcement of restrictions on “abusive,” “personally directed,” and “obscene” public comments was unconstitutional); *Ison v. Madison Local Sch. Dist. Bd. of Educ.*, 3 F.4th 887, 894–95 (6th Cir. 2021) (bans on “antagonistic,” “abusive,” and “personally directed” public comments violated First Amendment as effectuating “impermissible viewpoint discrimination” by prohibiting nondisruptive speech “purely because it disparages or offends”); *Mejia v. Lafayette Consol. Gov’t*, No. 6:23-CV-00307, 2025 U.S. Dist. LEXIS 52868, at \*24–25 (W.D. La. Mar. 20, 2025) (library board had no authority to restrict public comments on grounds they were “vile,” “derogatory,” or “confrontational”); *Marshall v. Amuso*, 571 F. Supp. 3d 412, 425–26 (E.D. Pa. 2021) (blocking unconstitutional enforcement of bans on “abusive,” “inappropriate,” “offensive,” and “personally directed” public comments).

<sup>12</sup> *Texas v. Johnson*, 491 U.S. 397, 414 (1989); *see also Baumgartner v. United States*, 322 U.S. 665, 673–74 (1944) (explaining freedom of expression necessarily protects “not only informed and responsible criticism,” but also “the freedom to speak foolishly and without moderation,” particularly in criticizing “public men and measures”).

<sup>13</sup> *Hustler Magazine, Inc. v. Falwell*, 485 U.S. 46, 50 (1988) (First Amendment protected a parody magazine ad depicting pastor Jerry Falwell recounting a drunken sexual encounter with his mother in an outhouse).

<sup>14</sup> *Matal v. Tam*, 582 U.S. 218, 243 (2017) (“Giving offense is a viewpoint.”). Even a restriction that “evenhandedly prohibits disparagement of all groups” is viewpoint-discriminatory, because determining whether speech is disparaging requires the government to consider the viewpoint expressed. *Id.*

unconstitutional in *any* forum.<sup>15</sup> A government body cannot evade these constitutional limits by conflating the mere use of controversial or provocative language with a breach of decorum or disruption of its proceedings.<sup>16</sup>

Chair Jackson’s decision to gavel Connors down was viewpoint-discriminatory because it was triggered not by any genuine disruption of the meeting, but by the way he satirized the school district.<sup>17</sup> Connors was speaking within his allotted time and addressing matters related to the district—namely the district’s hiring practices and its response to a bus aide’s sexual abuse of students—when the chair cut him off at the moment he delivered a satirical line condemning the district’s alleged failures. There was no actual, imminent, or threatened disorder. The chair’s stated objections that Connors was engaging in “mocking” and “racist rhetoric” confirm the interruption was based on disapproval of his tone and views, making her actions unconstitutional.

The Board’s post hoc characterization of Connors’ satirical lyric as an “obscene depiction of child molestation in parody” does not justify its censorship. First, Jackson’s real-time reaction made clear she was censoring Connors based on viewpoint. Second, while the First Amendment does not protect obscene expression, “obscenity” is a legal term of art with a narrow, precise definition. Expression may be banned as “obscene” only if “taken, as a whole,” the “average person, applying contemporary community standards” would consider it to “appeal[] to the prurient interest”; it depicts or describes “sexual conduct” in a “patently offensive” manner; *and* it lacks “serious literary, artistic, political, or scientific value.”<sup>18</sup> None of these three elements are met. Connors’ parody—however crude or unsettling—did not purport to titillate or appeal to sexual desire, nor did it depict the type of “patently offensive hard core sexual conduct” contemplated by the obscenity test.<sup>19</sup> It was plainly political speech criticizing the district’s hiring practices and its handling of a real sexual abuse scandal. If Connors used raw and disturbing language, it was to underscore the gravity of the offenses he believes resulted from the district’s negligence. That was a choice he had every right to make. As the Supreme Court has recognized, “words are often chosen as much for their emotive as their cognitive force,” and the former “may often be the more important element of the overall message sought

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<sup>15</sup> *Perry Educ. Ass’n v. Perry Local Educators’ Ass’n*, 460 U.S. 37, 60–62 (1983).

<sup>16</sup> *See, e.g., Norse v. City of Santa Cruz*, 629 F.3d 976 (9th Cir. 2010) (*en banc*) (rejecting city council’s attempt to “define ‘disturbance’ in any way they choose”: “Actual disruption means actual disruption. It does not mean constructive disruption, technical disruption, virtual disruption, *nunc pro tunc* disruption, or imaginary disruption.”).

<sup>17</sup> *Seemuller v. Fairfax Cnty. Sch. Bd.*, 878 F.2d 1578, 1583 (4th Cir. 1989) (holding public school teacher’s “use of satire to comment on a matter of public concern did not deprive him of the protection afforded by the first amendment,” and observing, “From Greek and Roman antiquity until the present time, commentators on public affairs have colored their writing with satire—sometimes humorous, sometimes gentle, sometimes caustic.”).

<sup>18</sup> *Miller v. California*, 413 U.S. 15, 24 (1973) (internal quotation marks omitted).

<sup>19</sup> *Id.* at 27. *See also Brown v. Entertainment Merchs. Ass’n*, 564 U.S. 786, 808 (2011) (Alito, J., concurring) (explaining the government may not restrict expression that falls below the “threshold limitation that restricts” obscenity to the kinds of “specifically described ‘hard core’ materials” *Miller* identified) (citing *Miller*, 413 U.S. at 23–25).

to be communicated.”<sup>20</sup> Labeling Connors’ biting criticism as “obscene” does not transform it into unprotected speech.

The Board’s reliance on its decorum policy does not alter the constitutional analysis either. A government policy cannot override the First Amendment.<sup>21</sup> The policy’s ban on “lewd, profane, or obscene language” is unconstitutional to the extent it reaches speech that neither disrupts the meeting nor meets the legal standard for obscenity. As this matter demonstrates, there are instances in which a speaker may use language the Board considers “lewd, profane, or obscene” in a non-disruptive manner. Again, government officials cannot lawfully censor speech just because they find it offensive. Nor can they stretch the meanings of “disruption” or “breach of decorum” to encompass their own negative reactions to public criticism.

The decorum policy is also unconstitutionally vague because speakers “of common intelligence must necessarily guess at its meaning,”<sup>22</sup> and it lacks “explicit standards” to prevent “arbitrary and discriminatory enforcement.”<sup>23</sup> Even in a limited public forum, where “some degree of discretion in how to apply a given policy is necessary, ‘that discretion must be guided by objective, workable standards’ to avoid the moderator’s own beliefs shaping his or her ‘views on what counts’ as a policy violation.”<sup>24</sup> Terms such as “lewd,” “profane,” and “obscene” (when detached from the constitutional standard) are vague because they are “irreparably clothed in subjectivity”—their interpretation varies from “speaker to speaker, and listener to listener.”<sup>25</sup> And the Board apparently lacks “guidance or other interpretive tools to assist in properly applying” the policies objectively.<sup>26</sup> “I know it when I see it” is not good enough.<sup>27</sup> The First Amendment demands lines fixed by clear and objective criteria, not by the arbitrary sensibilities of officials who may be tempted to silence speech and speakers they dislike.<sup>28</sup>

### **III. The No-Trespass Order Is Unconstitutional**

Because Connors’ speech was protected, the “No Trespassing Order” barring him from attending Board meetings or otherwise accessing district property for the rest of the academic

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<sup>20</sup> *Cohen v. California*, 403 U.S. 15, 26 (1971) (holding First Amendment protected right to wear jacket reading “Fuck the Draft” in public courthouse where children were present).

<sup>21</sup> U.S. CONST. ART. VI, CL. 2 (“This Constitution, and the Laws of the United States which shall be made in Pursuance thereof; and all Treaties made, or which shall be made, under the Authority of the United States, shall be the supreme Law of the Land.”).

<sup>22</sup> *Connally v. Gen. Constr. Co.*, 269 U.S. 385, 391 (1926).

<sup>23</sup> *Grayned v. City of Rockford*, 408 U.S. 104, 108–09 (1972).

<sup>24</sup> *Marshall*, 571 F. Supp. 3d at 425–26 (quoting *Minnesota Voters All. v. Mansky*, 585 U.S. 1, 21–22 (2018)).

<sup>25</sup> *Id.*

<sup>26</sup> *Id.*

<sup>27</sup> See *Obscenity Case Files: Jacobellis v. Ohio (“I know it when I see it”)*, COMIC BOOK LEGAL DEF. FUND, <https://cbldef.org/about-us/case-files/obscenity-case-files/obscenity-case-files-jacobellis-v-ohio-i-know-it-when-i-see-it>.

<sup>28</sup> The analysis in this section applies equally to the remarks Connors made at the May 12 meeting, which led Chair Jackson to cut his microphone for criticizing the district for hiring “pedophiles.” That comment was no less protected than Connors’ subsequent parody of the bus aide.

year violates the First Amendment. The order would not have been issued but for Connors' protected speech at the May 12 and October 13 meetings.

Connors' initial refusal to comply with the Director of School Safety and Risk Management's directive to leave the October 13 meeting does not justify the no-trespass order or convert Connors' protected speech into punishable misconduct. The directive was itself unlawful, premised as it was on Connors' exercise of his First Amendment rights. It is well-settled that "one cannot be punished for failing to obey the command of an officer if that command is itself violative of the Constitution."<sup>29</sup> When Connors was told to leave, he had already yielded the podium and returned to his seat, where he was causing no disturbance. He understandably was reluctant to leave the meeting because he knew the district was violating his rights, and he calmly asserted them. Nevertheless, when a sheriff's deputy then approached, Connors immediately left without incident. The record reflects no physical resistance, threats, or disturbance.<sup>30</sup> Neither Connors' public comments nor his momentary—and correct—assertion of his right to remain can justify the Board's sanctions.

And those sanctions are severe. The Board did not merely gavel Connors down and remove him from a single meeting; it barred him from attending any future meetings or accessing district property for eight months. That decision escalates two instances of reactive censorship into an unlawful prior restraint by "deny[ing] use of a forum in advance of actual expression."<sup>31</sup> When the government "sets out primarily to arrest the future speech of a [speaker] as a result of his past conduct, it operates like a censor, and as such violates First Amendment protections against prior restraint of speech."<sup>32</sup> Prior restraints are the "most serious and the least tolerable infringement on First Amendment rights,"<sup>33</sup> and there is a "heavy presumption" against their constitutionality.<sup>34</sup> Courts have repeatedly struck down prospective bans on individuals attending and speaking at government meetings, even where the speaker engaged in *actual* disruption or physical confrontation.<sup>35</sup> Even if the Board could show Connors'

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<sup>29</sup> *Wright v. Georgia*, 373 U.S. 284, 291–92 (1963).

<sup>30</sup> For the same reasons, Connors plainly did not violate any disorderly conduct laws. The Board's assertion otherwise is unfounded. Connors was not even charged, let alone convicted, of violating any such laws.

<sup>31</sup> *Se. Promotions, Ltd. v. Conrad*, 420 U.S. 546, 553 (1975).

<sup>32</sup> *Polaris Amphitheater Concerts, Inc. v. City of Westerville*, 267 F.3d 503, 507 (6th Cir. 2001).

<sup>33</sup> *Neb. Press Ass'n v. Stuart*, 427 U.S. 539, 559 (1976); *see also Baca*, 936 F. Supp. at 728 n.6.

<sup>34</sup> *Forsyth County v. Nationalist Movement*, 505 U.S. 123 (1992).

<sup>35</sup> *See, e.g., Vollmecke v. Indep. Sch. Dist.*, 753 F. Supp. 3d 792, 806 (W.D. Mo. 2024) (holding that even though plaintiff engaged in disruptive conduct, including speaking without recognition during school board meetings, banning him from all district property for one year was "not proportional to, and thus not justified by, [his] conduct"); *Wilson v. N. E. Indep. Sch. Dist.*, No. 5:14-CV-140-RP, 2015 U.S. Dist. LEXIS 132324, at \*8, 17–19 (W.D. Tex. Sep. 30, 2015) (holding that trespass warning barring plaintiff from all district property for two years—including school board meetings—after she grabbed school employee's fingers during argument operated as prior restraint that went "too far" by "completely foreclosing [the plaintiff's] ability to engage in expressive activity at the board meeting" and ignoring less restrictive alternatives like requiring plaintiff and certain employees "to keep a certain distance from each other at the meetings"); *Brown v. City of Jacksonville*, No. 3:06-cv-122-J-20MMH, 2006 U.S. Dist. LEXIS 8162 (M.D. Fla. Feb. 16, 2006) (city imposed unconstitutional prior restraint when it prohibited plaintiff from attending or speaking at city council meetings for nearly three months after she approached lectern when not recognized and had to be physically restrained by several officers).

comments were unprotected—which it cannot—extinguishing his ability to participate in public comment for the better part of a year would amount to an unlawful prior restraint. That the ban was imposed as punishment for protected criticism only compounds the violation. It must be set aside immediately.

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Based on the foregoing, FIRE calls on the Board to immediately rescind its no-trespass order against Connors and to bring its public comment policies and practices in line with the First Amendment. We respectfully request a substantive response to this letter no later than March 12, 2026.

Sincerely,

A handwritten signature in dark ink, appearing to read 'A. Terr', written in a cursive style.

Aaron Terr  
Director of Public Advocacy

Cc: Jeremy Siefker, Director of School Safety and Risk Management  
Major Delbert Myrick, Spotsylvania County Sheriff's Office