

March 20, 2026

By E-Mail ([garrett.gravley@fire.org](mailto:garrett.gravley@fire.org))

Garrett Gravley  
Foundation for Individual Rights and Expression  
510 Walnut Street, Suite 900  
Philadelphia, PA 19106

Re: Letter dated March 3, 2026 to President Perez, CSU Chico  
OGC File No. 23-0020

Dear Mr. Gravley:

I am a lawyer with the California State University system and the campus counsel for California State University, Chico (University or Chico State). I am responding on behalf of Chico State to your letter dated March 3, 2026 addressed to President Steve Perez, in which FIRE takes issue with the University's decision to pause fraternity recruitment for the current semester.

Your letter contends the University's recent decision to pause recruitment is "punishment" and "guilt-by-association" and violates the First Amendment. It questions whether "hazing is the pressing issue that Chico State says it is." And it asserts, while questioning whether hazing is even a problem, that a "better solution" would be to "combat the culture that gives rise to hazing, whether that be through anti-hazing education, workshops, or other means."

Respectfully, each of these premises is flawed. First and foremost, the University vehemently disagrees the pause is a form of punishment or "guilt-by-association" or otherwise violates the law. Second, the University acted based on facts, not conjecture, about hazing. Third, as described below, the University is doing precisely what FIRE is advocating to combat the culture of hazing. In short, Chico State stands by the decision to pause recruitment this semester and looks forward to resuming recruitment in Fall 2026 if Interfraternity Council chapters meet the University's requirements.

As you probably know, Chico State has three student-led governing councils which oversee local fraternity and sorority chapters that are University-recognized, including the Interfraternity Council (IFC). Currently, there are seven fraternity chapters that serve as members of the IFC: Beta Theta Pi, Gamma Zeta Alpha, Kappa Sigma, Sigma Alpha Epsilon, Sigma Nu, Tau Kappa Epsilon, and Phi Delta Theta. Last semester, there were eleven members, but four chose to disaffiliate with Chico State.

**CSU CAMPUSES**

Bakersfield  
Channel Islands  
Chico  
Dominguez Hills  
East Bay

Fresno  
Fullerton  
Humboldt  
Long Beach  
Los Angeles  
Maritime

Monterey Bay  
Northridge  
Pomona  
Sacramento  
San Bernardino  
San Diego

San Francisco  
San José  
San Luis Obispo  
San Marcos  
Sonoma  
Stanislaus

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In Fall 2025, after allowing first-time, first-semester freshman to participate in recruitment for Greek organizations for the first time in over ten years, the University was presented with serious allegations against multiple IFC-affiliated fraternity chapters. These included allegations that Chico State students in those fraternity chapters had engaged in hazing other Chico State students, including requiring students to take ice baths or engage in unhealthy cardiovascular activity and/or requiring underage students to consume large quantities of alcohol. All of these activities were in violation of University policy ([Executive Memorandum 25-010](#)) and the Student Code of Conduct. And the allegations were substantiated as to all of the IFC-affiliated fraternities.

Chico State prioritizes the safety of its students, and when faced with a widespread problem jeopardizing student safety, the University was compelled to act – and it acted in a rational, prudent manner that was limited in duration and scope. The University’s decision impacted only the organizations affiliated with the IFC, of which there are currently only seven.

While Chico State’s decision to pause recruitment for one semester was not formally announced to the entire Chico State community until February 4, 2026, the IFC and its organizations had been told of the possibility of this action throughout the Fall 2025 semester, and the decision was communicated to them on December 15, 2025. The University also reminded students that to join a recognized fraternity or sorority, they must be in good academic standing and have a minimum 2.5 cumulative GPA, among other requirements. The University stated that the “expectation is that IFC chapters will have the option to recruit new members in Fall 2026 if they meet the University’s expectations.” The University explained that in Spring 2026, “Student Affairs and Fraternity & Sorority Life (FSL) will collaborate with IFC chapters to develop clear, structured, and transparent recruitment and education processes grounded in national best practices.”

FIRE asserts that pausing recruitment for student organizations associated with the IFC infringes on their freedom of association. There is no merit to this assertion, and it is not supported by legal decisions. Fraternities are always free to disaffiliate with Chico State if they wish to recruit in Spring 2026, and indeed, some fraternities have done just that – disaffiliated with the University. For those that wish to retain their University affiliation, however, they must abide by this temporally and otherwise limited, safety-oriented measure, as well as all the other extensive safety-related requirements imposed on Greek organizations and other student organizations. (See [Recognized Student Organization \(RSO\) Handbook 2025-2026](#), pages 7-16.)

Hazing has been a focus of both Congress and the California legislature in recent years, including with the passage of the federal Stop Campus Hazing Act and the California Stop Campus Hazing Act (AB 2193). California has also enacted the Campus-Recognized Sorority and Fraternity Transparency Act (AB 524, codified at California Education Code sections 66310-66312), which mandates that Chico State and other institutions of higher education include in their requirements for campus recognition of a fraternity or sorority a requirement that the fraternity or sorority submit an annual report with specified information concerning their members and their conduct.

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Hazing can result in serious physical and emotional harm to students. The University's steadfast mission, in collaboration with student leadership and in compliance with the law, is to eliminate hazing and foster a culture of inclusion, respect and accountability across all student organizations. Partly, this is achieved by sanctioning the organizations and students who are found to have engaged in hazing. But as your letter points out, this is not effective by itself to address a "culture of hazing."

The courts have made clear that university decisions are owed substantial deference as long as they are rooted in academic considerations and do not constitute viewpoint discrimination. Chico State's decision to temporarily pause recruitment, for one semester, for IFC-affiliated organizations – when *only* IFC-affiliated organizations were found to have engaged in hazing the prior semester – is precisely such a decision.

FIRE's assertion this brief pause is somehow tantamount to a finding of "guilt," or is premised on the notion that the University "expects" the hazing "to happen again," is without any factual support. On the contrary, as the very communication quoted in your letter states, the pause is not intended as "punishment" but as a "protective decision designed to prioritize student safety while fraternity chapters work with the University" and an "opportunity" for the IFC and its chapters to "build a better fraternity life at Chico State."

Your letter also fundamentally misconstrues the limitations on recruitment. Many student organizations, including fraternities, have actively sought University recognition and the financial and other support that recognition entails. For those organizations, recognition comes with responsibility. If organizations do not wish to be affiliated with the University, or want to sever ties, they are also free to do so, and indeed, some have. And for those organizations, the University does not purport to limit member recruitment, nor could it. But for those organizations that have affirmatively sought and obtained University affiliation and imprimatur, and the benefits that goes with them, the University has a strong interest in ensuring the safety of the students who are member of those organizations.

Finally, the "solution" FIRE proposes – to discipline individual members and to conduct anti-hazing education and workshops – is exactly what Chico State has done. Any students found responsible for hazing are subjected to discipline in accordance with the Student Code of Conduct. And the University has created an anti-hazing workgroup and has put on dozens of trainings and workshops on hazing or hazing-related topics since the beginning of Fall 2025 semester. In addition to the many trainings offered, FSL actively organizes and engages all Greek organizations in National Hazing Prevention Week. Throughout the week, Chico State students are invited to participate in a variety of programs, including how to report hazing, prevention and bystander intervention training, resource and tabling fairs, interactive activities, and social media campaigns.

I am hopeful this addresses FIRE's concerns but am happy to discuss these matters further.

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Sincerely,



Stephen M. Silver

cc: Dr. Steve Perez, President  
Dr. Isaac Brundage, Vice President for Student Affairs  
Dr. Cirilo Cortez, Associate Vice President, Student Engagement and Retention Programs  
Kendall Ross, Senior Director, Student Life and Leadership  
Chuy Rojas Rivas, Program Coordinator, Fraternity and Sorority Life