



November 5, 2025

Travis Imel
Chief Student Affairs Officer
Gallaudet University
College Hall 208
800 Florida Avenue North East
Washington, D.C. 20002

Sent via U.S. Mail and Electronic Mail (travis.imel@gallaudet.edu)

Dear Mr. Imel:

Thank you for your October 14 response to our September 26 letter about Gallaudet’s restrictions on the expressive activity of fraternity and sorority members. We appreciate your explanation of the university’s rationale for these rules. However, we remain concerned that these rules restrict a host of innocuous student expression in ways that fail to meaningfully advance campus safety.

Though the university has compelling interests in, as you state, “preventing discrimination, harassment, and coercion,” banning students from using specific words and requiring current and incoming members to wear uniform clothing during events does not further these goals.¹ Gallaudet has ample means to address campus safety while upholding its promise to protect students’ right to express themselves.² As the university reviews the rules’ “proportionality[,] and whether some of these restrictions are narrowly tailored to genuine concerns,” we urge policymakers to recognize that restrictions on word choice and clothing are particularly untethered from the goals you state.³

Specifically, we call on Gallaudet to rescind its “Language & Traditional Guidelines,”⁴ its requirement that “all members must be in similar dress” for new member programs, and its

¹ Letter from Travis Imel, Chief Student Affairs Officer, to Zach Greenberg, FIRE Student Association Counsel (Oct. 14, 2025) (on file with author).

² *Expressive Activities and Assembly*, GALLAUDET UNIV., <https://gallaudet.edu/operations/administration-and-operation-manual/125-expressive-activities-and-assembly/> [<https://perma.cc/N7Z9-ZFCW>] (“Gallaudet University has an obligation to maintain conditions under which the work of the University can go forward freely, in accordance with the highest standards of quality, institutional integrity, and freedom of expression, with full recognition by all concerned of the rights and privileges, as well as responsibilities, of those who comprise the University community.”).

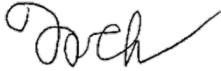
³ Letter from Imel, *supra* note 1.

⁴ *Greek Reform Guidelines*, GALLAUDET UNIV. (July 11, 2025) (on file with author); *Greek Terms*, GALLAUDET UNIV. (July 10, 2025),

requirement that “[w]eather-appropriate clothing must be worn by all members” in marches.⁵ These rules serve no purpose other than to burden students’ expressive rights. Indeed, it is difficult to discern what purpose could possibly be served by limiting students from using Gallaudet’s list of supposedly “Outdated” terms: “Rush,” “Pledge,” “Pledging,” “Pledge Class,” “Nationals,” “Girls/Boys,” “Sorority Girl/Frat Boy,” “Big/Little,” “Colony,” “Rush Chair,” and “Legacy (context-dependent).”⁶

Gallaudet students, including the many Greek Life members concerned about free speech and students’ rights, are more than capable of determining their own clothing and terminology. FIRE would be pleased to offer policy suggestions that allow Gallaudet to protect both campus safety and students’ expressive rights.

Sincerely,



Zach Greenberg
Student Association Counsel, Campus Rights Advocacy

Cc: Michelle Gerson-Wagner, Director, Office of Student Engagement and Leadership
Roberta Cordano, President

<https://docs.google.com/document/d/18vYz3fNxv2MhJAK7ZOaSQGKQ1kZBVce7SWXE0bjh80Y/edit?tab=t.0> [<https://perma.cc/6RED-6QFX>].

⁵ *Greek Reform Guidelines*, *supra* note 4.

⁶ *Greek Terms*, *supra* note 4.