



March 18, 2026

Paul Beaudin
Office of the President
Manchester Community College
1066 Front Street, Room 256
Manchester, New Hampshire 03102

Sent via U.S. Mail and Electronic Mail (pbeaudin@ccsnh.edu)

Dear President Beaudin:

FIRE, a nonpartisan nonprofit that defends free speech,¹ is concerned by Manchester Community College's directive that student Samuel Raiti move his Turning Point USA table from outside the building's main entrance because of TPUSA's political nature. As a public institution bound by the First Amendment,² MCC may not restrict student speech in public areas based on its content. We therefore call on MCC to affirm that student expression can occur in all outdoor areas on campus, regardless of its content or viewpoint.

On October 22, 2025, TPUSA MCC president Raiti set up a table with TPUSA messaging and merchandise on the sidewalk near MCC's main entrance in an area that did not obstruct pedestrian traffic, shown below.³

¹ For more than 25 years, FIRE has defended free expression and other individual rights on America's college campuses. You can learn more about our mission and activities at fire.org.

² See *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).

³ TPUSA's MCC chapter is a recognized student group. One sign included a picture of the American flag, with the caption, “Freedom to try[.] Grit to Succeed[.]” Another included a picture of TPUSA founder Charlie Kirk, with the caption, “Not just a country, a movement[.]” The main banner advertised TPUSA's student website. The recitation of facts here reflects our understanding of the situation based on Raiti's narrative. We appreciate that you may have additional information and invite you to share it with us.



MCC Director of Communication and Marketing Vicky Jaffe approached and instructed Raiti to relocate because TPUSA is a “political group” that disseminates “political ideas.” Shortly thereafter, Vice President of Student Affairs Megan Conn also approached Raiti, ordering him to relocate to a more isolated area and telling him that the area was not available for expressive activity.⁴ Conn cited MCC’s expressive activities policies as the basis for her decision, while acknowledging that the tabling location did not pose a safety concern. She directed Raiti to move to an area inside the school or “the grass area between the row of visitor parking and the next parking lot.”⁵

The First Amendment circumscribes MCC’s ability to limit communicative expressive activity in public forums generally.⁶ And New Hampshire law makes clear that “[t]he outdoor areas of campuses of public institutions of higher education in this state shall be deemed public

⁴ As discussed below, FIRE was unable to locate any MCC policy prohibiting expressive activity in this area.

⁵ Email from Megan Conn, Vice President of Student Affairs, to Samuel Raiti, student (Oct. 23, 2025, 4:45 PM) (screenshot on file with author).

⁶ *Perry Educ. Ass’n v. Perry Local Educators’ Ass’n*, 460 U.S. 37, 45 (1983).

forums[.]”⁷ Additionally, according to state law, such institutions “shall not create ‘free speech zones’ or other designated areas of campus outside of which expressive activities are prohibited.”⁸ MCC policy appears to comply with these mandates: FIRE was unable to locate any policy restricting expression near the entrance, and none was supplied to Raiti.

Indeed, in clear contravention of both law and policy, the evidence suggests that MCC expressly restricted Raiti’s speech because of its political content. After all, there has been expressive activity in that area before. And contrary to Jaffe’s assertion, Raiti’s expression being political did not justify its exclusion from a public forum. In fact, the First Amendment’s protection is “at its zenith” when it comes to “core political speech.”⁹

Nor may MCC cite time, place, and manner restrictions to remove Raiti’s table. Time, place, and manner restrictions may exist in public forums only if they are “justified without reference to the content of the regulated speech,”¹⁰ or else they are presumptively unconstitutional.¹¹ They must also be “narrowly tailored to serve a significant governmental interest” and “leave open ample alternative channels for communication of the information.”¹² Conn’s directive did not serve a significant government interest since, as indicated by the photos and Conn’s own acknowledgement, Raiti was not obstructing pedestrian traffic or otherwise posing a safety concern. Moreover, the grassy area between the parking lots is not an ample alternative to the front entrance.¹³ In a college with more than 3,000 students,¹⁴ a location near a main entrance to the building clearly offers more potential to reach those students than a particular area between two parking lots, one of which is not even *for* students.

To designate the space between parking lots as an approved “free speech zone” while restricting expressive activity in other outdoor areas of campus violates state law¹⁵ and the

⁷ N.H. Rev. Stat. § 188-J:2.

⁸ *Id.*

⁹ *Buckley v. Am. Const. Law Found.*, 525 U.S. 182, 183 (1999) (quoting *Meyer v. Grant*, 486 U.S. 414, 421–22, 425 (1988)).

¹⁰ *Ward v. Rock Against Racism*, 491 U.S. 781, 791 (1989) (quoting *Clark v. Cmty. for Creative Non-Violence*, 468 U.S. 288, 293 (1984)).

¹¹ *Reed v. Town of Gilbert*, 576 U.S. 155, 163 (2015).

¹² *Clark*, 468 U.S. at 293.

¹³ *See Members of City Council v. Taxpayers for Vincent*, 466 U.S. 789, 803 (1984) (in determining amplex, the Court considered an ordinance’s effect on “the total quantity” of the speaker’s communication); *Berger v. City of Seattle*, 569 F.3d 1029, 1049 (9th Cir. 2009) (“[A]n alternative is not ample if the speaker is not permitted to reach the intended audience[.]”). Compelling Raiti to relocate to an unspecified, more obstructed area affects the quantity of the speaker’s communication.

¹⁴ *Fast Facts*, Enrollment, MANCHESTER CMTY. COLL., <https://mccnh.edu/about/fast-facts/>.

¹⁵ *See* N.H. Rev. Stat. § 188-J:2.

First Amendment, and generally offends free speech principles.¹⁶ Colleges are “peculiarly ‘the marketplace of ideas,’”¹⁷ and like real marketplaces, ideas cannot flourish in isolated enclaves.

We request a substantive response to this letter no later than the close of business on April 1, confirming MCC will affirm that student expression can occur in all outdoor areas on campus area regardless of the content being expressed.

Sincerely,



Garrett Gravley
Program Counsel, Campus Rights Advocacy

Cc: Vicky Jaffe, Director of Communications and Marketing
Aileen Clay, Director of Student Life
Megan Conn, Vice President of Student Affairs and Community Development

¹⁶ Free speech zones are a “sort of micromanagement” that “can function like a free speech quarantine, allowing schools to banish student and faculty speakers to tiny outposts on the fringes of campus.” Raeba Pradhan, *Maryland bill would end ‘free speech zones’ on public campuses*, FIRE (March 9, 2026), <https://www.fire.org/news/maryland-bill-would-end-free-speech-zones-public-campuses>.

¹⁷ *Healy*, 408 U.S. at 180 (internal citation omitted).