



March 17, 2026

Carolyn Ringer Lepre
Office of the President
Salisbury University
1101 Camden Avenue
Halloway Hall 238
Salisbury, Maryland 21801

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

Dear President Lepre:

FIRE, a nonpartisan nonprofit that defends free speech,¹ is concerned by Salisbury University’s “postponement” of a student sponsored March 9 speaking event featuring author and political activist Jared Taylor. On March 3, after the event announcement drew ire from students who characterized Taylor as a white supremacist,² Salisbury announced on March 6 that it was postponing the event “based on public safety considerations, in alignment with [its] time, place, and manner policies.”³ Salisbury cited, as public safety considerations, the anticipated attendance at the event, possible counter-demonstrations, and increased security needs, all of which administrators say arose within the previous 24 hours.⁴ Many on campus celebrated the postponement, including organizers of an event originally intended to counter Taylor’s talk (which, unlike Taylor’s talk, proceeded as planned).⁵ One of the original Taylor event

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

² See, e.g., Salisbury College Dems (@salisbury_collegedemocrats), INSTAGRAM (Mar. 5, 2026), https://www.instagram.com/p/DVhfs0EDA4E/?img_index=1 [<https://perma.cc/A2Z5-CQMK>]; see also Tessah Good, *SU postpones Jared Taylor event that ignited campus outrage*, THE FLYER (Mar. 6, 2026), <https://www.thesuflyer.com/post/su-postpones-jared-taylor-event-that-ignited-campus-outrage>. The recitation reflects our understanding of the pertinent facts. We appreciate that you may have additional information and invite you to share it with us.

³ *Salisbury University Message on Postponed Maryland Federation of College Republicans Event*, SALISBURY UNIV. (Mar. 6, 2026), <https://www.salisbury.edu/news/article/2026-3-6-Salisbury-University-Message-on-Postponed-Maryland-Federation-of-College-Republicans-Event>. Salisbury never specified which time, place, and manner policies it was referencing. Regardless, time, place, and manner restrictions must be narrowly drawn to achieve a compelling state interest while leaving open alternative channels of communications. *Ward v. Rock Against Racism*, 491 U.S. 781, 782–83 (1989). Public outcry or disrepute is never a content-neutral reason to restrict speech. *Forsyth Cnty. v. Nationalist Movement*, 505 U.S. 123, 134 (1992). For reasons discussed below, Salisbury fails this test.

⁴ *Id.*

⁵ Wicomico Democrats (@wicomicodemocrats), INSTAGRAM (Mar. 11, 2026), <https://www.instagram.com/p/DVvrXZeDkh-/> [<https://perma.cc/62WS-CXGA>].

organizers, student Colin McEvers, has been trying to reschedule the event, but as of this writing, nothing has been confirmed.⁶

As a public institution bound by the First Amendment,⁷ Salisbury is obligated to protect speech that some members of a community may find controversial or offensive.⁸ The First Amendment protects students' and student groups' broad expressive right to both invite and hear speakers free from limitations that arise "simply because [the speech] might offend a hostile mob."⁹ As the Supreme Court has explained, "[Speech] may indeed best serve its high purpose when it induces a condition of unrest ... or even stirs people to anger. Speech is often provocative and challenging. It may strike at prejudices and preconceptions and have profound unsettling effects as it presses for acceptance of an idea."¹⁰ This is especially true of political speech, the protection of which lies at the core of the First Amendment,¹¹ and is of utmost necessity in times of intense disagreement on "sensitive topics like race, where the risk of conflict and insult is high."¹²

No matter how offensive some may consider his beliefs to be, Taylor's right to speak is undoubtedly protected by the First Amendment, and Salisbury students have a First Amendment right to associate with him for the purposes of hearing what he has to say.¹³

These rights cannot be restricted merely because Salisbury foresees contention and disharmony.¹⁴ While Salisbury has an important interest in ensuring student safety, it may not invoke vague public safety concerns to squelch debate and discussion. Salisbury has not disclosed any specific threats to campus safety or security that informed the decision to

⁶ Email from Iva Riggin, Administrative Assistant, to Colin McEvers, student (Mar. 12, 2026, 1:56 PM) (on file with author).

⁷ *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)).

⁸ *Texas v. Johnson*, 491 U.S. 397, 414 (1989) (burning the American flag is protected by free speech based on the "bedrock principle" that government actors "may not prohibit the expression of an idea simply because society finds the idea itself offensive or disagreeable"); see also *Matal v. Tam*, 582 U.S. 218, 247 (2017) (free speech protects expression viewed as "hateful" or demeaning "on the basis of gender, religion, age, disability, or any other similar ground").

⁹ *Forsyth*, 505 U.S. at 134–35.

¹⁰ *Terminiello v. Chicago*, 337 U.S. 1, 4 (1949); see also *Snyder v. Phelps*, 562 U.S. 443, 461 (2011) ("As a Nation we have chosen ... to protect even hurtful speech on public issues to ensure that we do not stifle public debate.").

¹¹ *Buckley v. Am. Const. Law Found.*, 525 U.S. 182, 186–87 (1999).

¹² *Rodriguez v. Maricopa Cnty. Comm. Coll. Dist.*, 605 F.3d 703, 708 (9th Cir. 2010). This necessity is compounded by the fact that this is a college campus, which is "peculiarly the 'marketplace of ideas.'" *Healy*, 408 U.S. at 180 (internal citation omitted).

¹³ *Roberts v. U.S. Jaycees*, 468 U.S. 609, 622 (1984) (recognizing "right to associate with others in pursuit of a wide variety of political, social, economic, educational, religious, and cultural ends"); see also *Healy*, 408 U.S. at 181.

¹⁴ See *Heward v. Bd. of Educ. of Anne Arundel Cnty.*, 1:23-cv-00195-ELH, 2023 WL 6381498, at *41 (D. Md. Sept. 29, 2023) ("a school's 'abstract desire to avoid controversy' provides no basis for restricting a student's protected speech") (quoting *Morse v. Frederick*, 551 U.S. 393, 409 (2007)).

postpone the event. General concerns about the anticipated attendance, possible counter-demonstrations, and a projected increase in security needs are nothing more than an “undifferentiated fear or apprehension of disturbance [which] is not enough to overcome the right to freedom of expression.”¹⁵ In holding that even the violent reaction of a hostile mob cannot justify cutting off a speaker’s protected expression, the Sixth Circuit has explained that:¹⁶

Maintenance of the peace should not be achieved at the expense of the free speech. The freedom to espouse sincerely held religious, political, or philosophical beliefs, especially in the face of hostile opposition, is too important to our democratic institution for it to be abridged simply due to the hostility of reactionary listeners who may be offended by a speaker’s message.

By postponing the event—especially within 24 hours after public outcry—Salisbury has sent the message to its students and the public that campus discourse can be thwarted simply because some are vigorously opposed to the views that may be expressed. Capitulating to such pressure does not make the university safer. If anything, it makes it less safe, as it strongly suggests that the most effective way to silence opponents at Salisbury is to engage, or threaten to engage, in activities the campus will see as a threat to safety. The contours of debate on Salisbury’s campus must not be set by the whims of those most willing to engage in disruptive behavior.

When an expressive event is being targeted for disruption, Salisbury must respond not with immediate postponement, but with “bona fide efforts” to protect the speaker and audience’s expressive rights “by other, less restrictive means.”¹⁷ For example, it might hire more police officers to work the event and make clear that unlawful disruption of speakers will not be tolerated. To the extent that there may truly have been threats to the event so serious that Salisbury felt it had no choice but to postpone it, Salisbury has a responsibility to report those threats to law enforcement so they can be investigated and criminal charges pursued, if appropriate.

As things stand, and without greater transparency into its decision-making process, it appears Salisbury postponed the event because of opposition to Taylor and his views.¹⁸ That one of the counter-demonstrations (which may or may not have been one of those factors Salisbury considered a security concern) was allowed to proceed, while the Taylor event was not, plainly suggests viewpoint discrimination, the most “egregious” act of censorship.¹⁹

Even if Salisbury did not subjectively intend to burden Taylor and McEvers’ speech based on its viewpoint, we implore you to consider the practical reality of what happened. An expressive

¹⁵ *Tinker v. Des Moines Indep. Cmty. Sch. Dist.*, 393 U.S. 503, 508 (1969).

¹⁶ *Bible Believers v. Wayne Cnty.*, 805 F.3d 228, 252 (6th Cir. 2018).

¹⁷ *Id.*

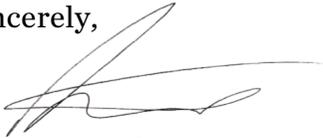
¹⁸ This is called a “hecklers’ veto,” which is a “form of censorship, where a speaker’s event is canceled due to the actual or potential hostility of ideological opponents.” Zach Greenberg, *Rejecting the ‘heckler’s veto,’* FIRE (June 14, 2017), <https://www.fire.org/news/rejecting-hecklers-veto>.

¹⁹ *Rosenberger v. Rector & Visitors of the Univ. of Va.*, 515 U.S. 819, 829 (1995).

event was announced. Students opposed to that event started planning another expressive event to compete with that event, and when administrators effectively cancelled the “offending” event, students and faculty gathered to celebrate the cancellation and embrace the censorship of the speaker as a win. Whether inadvertent or purposeful, this sequence of events clearly sends the message to Salisbury students, faculty, and the community that disruption, violence, or the threat thereof is an effective way to silence views to which one is opposed.

We request a substantive response to this letter no later than the close of business on March 24, 2026, confirming Salisbury will work with McEvers and other organizers to reschedule the event with Taylor and that, moving forward, events will not be postponed or cancelled due to public opposition or pretextual public safety concerns.

Sincerely,



Garrett Gravley
Program Counsel, Campus Rights Advocacy

Cc: Zebediah Hall, Interim Vice President of Student Affairs
Karen A. Treber, General Counsel