



April 9, 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:

While FIRE is pleased to hear that Salisbury is working to reschedule the student-sponsored event featuring Jared Taylor, we are concerned that it has imposed an estimated \$2,540 in security fees due to the “public nature of the event, the potential to reach max capacity of the space, and the importance of keeping [the student sponsor], [the] speaker, and all attendees safe[.]”<sup>1</sup> Forcing a student sponsor to shoulder the costs of extra security because of Salisbury’s subjective judgment that Taylor’s controversial nature necessitates that security violates the students’ First Amendment rights. By allowing an anticipated negative or violent reaction to a planned speaker to raise the costs placed upon that speaker and its hosts, Salisbury incentivizes just such a reaction, putting freedom of expression at risk. Salisbury must therefore immediately rescind the security fee requirement it has imposed.

As you may recall from our previous correspondence, Taylor was originally slated to speak on March 9 for a Maryland Federation of College Republicans event.<sup>2</sup> The planned engagement drew backlash from students and community members, who characterize Taylor as a white supremacist. On March 6, Salisbury announced that it was postponing the event “based on public safety considerations, in alignment with [its] time, place, and manner policies.”<sup>3</sup> The

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<sup>1</sup> Email from Lesley Staffeldt, Director of Conference Services, to Colin McEvers, student (Mar. 27, 2026, 7:48 AM) (on file with author). Staffeldt also recommended having emergency medical technicians on site, which would raise the fee by an additional \$620.

<sup>2</sup> Letter from Garrett Gravley, FIRE Program Counsel, to Carolyn Lepre, president (Mar. 17, 2026), *available at* <https://www.fire.org/research-learn/fire-letter-salisbury-university-march-17-2026>. While MFCR is a non-student group, its chairman and the event’s chief organizer, Colin McEvers, is a Salisbury student.

<sup>3</sup> *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> [<https://perma.cc/F439-QDXZ>].

controversy was evidently so pressing that in your 2026 State of the University Address on March 11, you immediately addressed it before delivering the actual address:<sup>4</sup>

I want to take a moment to briefly acknowledge the events of last week surrounding the controversial outside speaker who had been scheduled to speak on our campus. Salisbury University does not endorse or support this speaker's views, and we condemn his extremist rhetoric that is fundamentally inconsistent with the university's core values of respect, equity, and inclusion. Moments like this are challenging. Public institutions, as government entities, are legally bound to uphold the First Amendment. It is also our primary responsibility to put the safety and well-being of our community first. And as significant concerns were raised, the event did not take place.

The aftermath of the event's cancellation drew considerable media attention in the Maryland press.<sup>5</sup> On March 27, Salisbury administrator Lesley Staffeldt notified student organizer Colin McEvers of the security fee determination.<sup>6</sup> McEvers has since been forced to crowdsource funds online to keep the event going.<sup>7</sup> As of April 8, with the event now rescheduled for April 29, McEvers has raised only \$405.<sup>8</sup>

While Salisbury's Facilities Use Policy states that external groups are responsible for facility fees and other event costs,<sup>9</sup> the security costs imposed on the host cannot be based primarily on hostile public reaction to the speaker.<sup>10</sup> In this case, Salisbury appears to have affixed the unreasonable additional security price tag to Taylor's speech because it expects the event to draw protests or receive threats. Yet as a public university bound by the First Amendment,<sup>11</sup> Salisbury cannot impose excessive fees on a host because of expected protests or controversy based on the speaker's views.

The Supreme Court addressed this issue in *Forsyth County v. Nationalist Movement*, when it invalidated an ordinance that permitted a local government to set varying event fees based on

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<sup>4</sup> Salisbury University, *State of the University Address 2026* | Salisbury University, YOUTUBE, <https://www.youtube.com/watch?v=SnmlvcmIzys&t=202s>.

<sup>5</sup> See, e.g., Ellie Wolfe, 'Godfather of the alt-right' Jared Taylor to speak at Salisbury University, THE BALT. BANNER (Apr. 2, 2026), <https://www.thebanner.com/education/higher-education/jared-taylor-alt-right-salisbury-university-talk-RBBHMH764ZAJHAL4NONNB46CI4/>.

<sup>6</sup> Email from Staffeldt, *supra* note 1.

<sup>7</sup> Colin McEvers, *Jared Taylor Speech at Salisbury University*, GIVESENDGO, [https://www.givesendgo.com/jaredtaylorsalisbury?utm\\_source=website\\_share&utm\\_medium=sharelink&utm\\_campaign=jaredtaylorsalisbury](https://www.givesendgo.com/jaredtaylorsalisbury?utm_source=website_share&utm_medium=sharelink&utm_campaign=jaredtaylorsalisbury) (last visited Apr. 8, 2026).

<sup>8</sup> *Id.*

<sup>9</sup> *Salisbury University Facilities Use Policy*, Facilities/Service Fee Payors, Group 3: External Groups and Organizations, SALISBURY UNIV. (rev. Aug. 2024), [https://www.salisbury.edu/administration/student-affairs/conference-services/\\_files/Facilities-use-policy-08-24.pdf?v=20251216083142](https://www.salisbury.edu/administration/student-affairs/conference-services/_files/Facilities-use-policy-08-24.pdf?v=20251216083142) [https://perma.cc/8FZP-VFVR]. To be clear, FIRE has no issue with content-neutral expenses such as the facility and audiovisual technician fees.

<sup>10</sup> *Forsyth Cnty. v. Nationalist Movement*, 505 U.S. 123, 134–35 (1992).

<sup>11</sup> *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).

the amount of police protection required.<sup>12</sup> The ordinance was enacted following a 1987 civil rights march of about 90 demonstrators who were met by a crowd of more than 400 counter-protesters, including members of the Ku Klux Klan.<sup>13</sup> When the civil rights demonstrators arrived, the counter-protesters pelted them with rocks and beer bottles while chanting racial slurs.<sup>14</sup> The following weekend, after the confrontation made national news, over 20,000 pro-civil rights demonstrators rallied in the county, with over 3,000 National Guardsmen deployed against 1,000 counter-protesters.<sup>15</sup> The Forsyth County Board of Commissioners passed the event fee ordinance in direct response to this, just days after the second demonstration.<sup>16</sup> The ordinance authorized the county to charge up to \$1,000 per day in security fees, with discretion being given to county officials with specific regard “to the maintenance of public order.”<sup>17</sup>

Despite the intense racial conflict and the resulting public safety concerns, the Court held Forsyth County’s implementation of the ordinance did not rely on “narrowly drawn, reasonable and definite standards guiding the hand of the Forsyth County administrator,” noting that “[n]othing in the law or its application prevents the official from encouraging some views and discouraging others through the arbitrary application of fees.”<sup>18</sup> The Court warned that under the First Amendment, “[s]peech cannot be financially burdened, any more than it can be punished or banned, simply because it might offend a hostile mob.”<sup>19</sup>

Accordingly, when Salisbury reviews each event to determine the appropriate security fees to charge the host, it must adhere to narrowly drawn, viewpoint- and content-neutral, and otherwise reasonable standards—standards that guard against charging students more money for security protection because others in the community might be offended by an event and subsequently become violent or disruptive.<sup>20</sup> If more protection is in fact required for purposes of public safety, Salisbury must provide that protection without shifting that cost to the host. Allowing the subjectively determined controversial nature of a speaker to form the basis for exorbitant fees effectuates a heckler’s veto, allowing the anticipated audience reaction to price speakers out of the marketplace of ideas.<sup>21</sup>

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<sup>12</sup> *Forsyth*, 505 U.S. at 134–35.

<sup>13</sup> *Id.* at 125.

<sup>14</sup> *White Protestors Disrupt ‘Walk for Brotherhood’ in Georgia Town*, N.Y. TIMES (Jan. 18, 1987), <https://www.nytimes.com/1987/01/18/us/white-protestors-disrupt-walk-for-brotherhood-in-georgia-town.html>; *Forsyth*, 505 U.S. at 125.

<sup>15</sup> *Forsyth*, 505 U.S. at 125–26.

<sup>16</sup> *Id.* at 126.

<sup>17</sup> *Id.* at 126–27. The ordinance was amended to cap the fees in June 1987, after Forsyth County encountered legal challenges against the initially unfettered permitting scheme. See Molly Read, *March Ordinance Amended*, FORSYTH CNTY. NEWS (Jun. 10, 1987), <https://gahistoricnewspapers.galileo.usg.edu/lccn/sn84007709/1987-06-10/ed-1/seq-1/>.

<sup>18</sup> *Id.*

<sup>19</sup> *Id.* (“The fee assessed will depend on the administrator’s measure of the amount of hostility likely to be created by the speech based on its content. Those wishing to express views unpopular with bottle throwers, for example, may have to pay more for their permit.”).

<sup>20</sup> We could not find any university policies that guided security fees for such events in this fashion. If there is none, we urge Salisbury to enact such a policy. In accordance with FIRE’s charitable mission, we are happy to assist in policy revisions to ensure students’ expressive rights are protected alongside Salisbury’s institutional interests.

<sup>21</sup> See, e.g., *Watson v. Memphis*, 373 U.S. 526, 535 (1963) (“[C]onstitutional rights may not be denied simply because of hostility to their assertion or exercise.”).

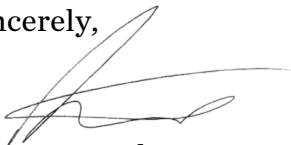
And an anticipated hostile audience reaction is the only explanation for the high security fees for the Taylor event, as there is nothing else about the event that would render it unsafe compared to events of a similar size and venue. Taylor is not a lion tamer or pyrotechnician giving a demonstration; he is a political activist whose words have outraged other people, including members of Salisbury’s own community. And if those members did not make their disapproval of Taylor and his engagement known, it is highly unlikely that you would have felt compelled to begin your State of the University Address with remarks about it, noting that “[m]oments like this are challenging,” and “significant concerns were raised.” The circumstances plainly speak for themselves.

Through its actions here, Salisbury risks giving those most willing to use threats of disruption or violence a “road map” of how to suppress the viewpoints of disfavored groups in precisely the manner *Forsyth* sought to prohibit. Any individual could announce plans to disrupt a Salisbury group’s campus event, and encourage others to do so, knowing that Salisbury would respond by financially burdening the group to the point that it can no longer afford to exercise its right to free speech. This kind of heckler’s veto is a perverse and unacceptable outcome that has no place in a free society.<sup>22</sup> If this precedent had prevailed in Forsyth County, Georgia, the Klansmen looking to silence the civil rights demonstrators would have been able to successfully do so merely by making their discontent known to the local authorities. We trust that Salisbury agrees that it would not have been just for 400 Klansmen to have the power to silence civil rights marchers by making threats credible or violent enough that the government would charge exorbitant fees as a condition for allowing their march.

Because Salisbury is a government entity committed to both free expression and student safety, it—not students—must foot the bill to ensure a broad range of viewpoints can be heard on campus. With over \$140 million in net assets, we are confident that Salisbury can pay the \$2,540 security fees for this event without issue.<sup>23</sup>

Considering the urgency of this matter, we request a substantive response to this letter no later than April 16, 2026, confirming Salisbury will immediately lift the imposition of the security fees and ensure the event with Taylor can move forward.

Sincerely,



Garrett Gravley  
Program Counsel, Campus Rights Advocacy

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

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<sup>22</sup> *Rock for Life-UMBC v. Hrabowski*, 411 Fed.Appx. 541, 554 (4th Cir. 2010) (the heckler’s veto is “an impermissible form of content-based speech regulation”); *St. Michael’s Media, Inc. v. Mayor & City Council of Balt.*, 566 F.Supp.3d 327, 365–375 (D. Md. 2021) (ceding to a heckler’s veto is most likely viewpoint discrimination).

<sup>23</sup> *Impact Report 2024-2025*, Financial Year in Review, SALISBURY UNIV. 15 (Nov. 3, 2025), [https://www.salisbury.edu/administration/advancement/university-foundation/\\_files/Impact-Report-24-25.pdf?v=20251103152534](https://www.salisbury.edu/administration/advancement/university-foundation/_files/Impact-Report-24-25.pdf?v=20251103152534) [<https://perma.cc/P3AA-RTRG>].