



May 12, 2026

Chris W. Brussalis  
Office of the President  
Point Park University  
201 Wood Street  
Pittsburgh, Pennsylvania 15222-1984

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

Dear President Brussalis:

FIRE, a nonpartisan nonprofit that defends free speech,<sup>1</sup> is concerned by the state of free expression and association at Point Park University after the Student Government Association unanimously opposed formalizing Turning Point USA as a student organization at its April 27 meeting.<sup>2</sup> Although Dean of Student Life Michael Gieseke advised SGA senators to limit their recognition discussion solely to TPUSA's proposed constitution, senators raised concerns regarding the chapter's advisor Colin Dowd, and the political views of both Dowd and TPUSA founder Charlie Kirk.<sup>3</sup> While some on campus may disagree with TPUSA's mission or expression, this viewpoint-based rejection is a form of censorship that violates PPU's commitments to its students' freedom of expression and association. We therefore urge PPU to require SGA to use viewpoint-neutral criteria when voting on recognition for student groups, including TPUSA, and we call on SGA to reconsider the matter in this light.

As the organization tasked with recognizing student groups on behalf of PPU,<sup>4</sup> SGA's determinations must be consistent with PPU's commitment "to create an environment where

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<sup>1</sup> For more than 25 years, FIRE has defended freedom of expression and other individual rights on America's university campuses. You can learn more about our mission and activities at [fire.org](https://fire.org).

<sup>2</sup> Gavin Petrone, *SGA strikes down Turning Point USA club application in final meeting of semester*, THE GLOBE (Apr. 29, 2026), <https://ppuglobe.com/2026/04/sga-strikes-down-turning-point-usa-club-application-in-final-meeting-of-semester/>. The recitation of facts here reflects our understanding of the pertinent information. We appreciate that you may have additional information and invite you to share it with us.

<sup>3</sup> *Id.* While tabling near campus in February 2026, Dowd chased down a student who stole a sign from his table. Gavin Petrone, *Turning Point USA's Village Park visit spurs controversy*, THE GLOBE (Feb. 18, 2026), <https://ppuglobe.com/2026/02/turning-point-usas-village-park-visit-spurs-controversy/>. Additionally, SGA senators read comments from a video Dowd posted about the tabling incident. Petrone, *supra* note 2.

<sup>4</sup> *2025-2026 Student Planner and Handbook*, Student Organizations, Student Government Association, POINT PARK UNIV. 126-27 (Sept. 15, 2025), <https://www.pointpark.edu/studentlife/studentconduct/studentplannerhandbook/media/point-park->

ideas can be exchanged freely and respectfully.”<sup>5</sup> SGA’s decision to deny TPUSA recognition over its views or the community’s hostility towards those views violates the group’s free speech rights under PPU’s laudable policy protecting free speech. This commitment to free speech—and a reasonable student’s interpretation of it—are informed by First Amendment jurisprudence and Pennsylvania contract law.<sup>6</sup> That SGA, rather than PPU’s administration, made the decision does not absolve the institution of its responsibility to act in accordance with these rules and principles, as PPU’s SGA acts with the university’s authority when recognizing student groups on behalf of the university.<sup>7</sup>

The inevitability that students will disagree with one another, even vehemently, on hotly contested academic and societal issues is precisely what PPU contemplates when it promises its students free speech. This holds even if some listeners are, or claim to be, personally offended by those disagreements.<sup>8</sup> For this commitment to have any meaning, though, SGA must employ only content- and viewpoint-neutral criteria in decisions to recognize and/or fund student organizations.<sup>9</sup> Failure to do so constitutes viewpoint discrimination, “an egregious form” of censorship.<sup>10</sup> And here, SGA’s vote against TPUSA’s recognition was

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student-handbook-2025-2026.pdf [<https://perma.cc/XAX9-YJGZ>] (“Student Government Association (SGA) approves all new club and organizations”).

<sup>5</sup> *Protests, Demonstrations, and Gatherings on Point Park Property*, Open Expression and Assembly Rights, POINT PARK UNIV. (Oct. 30, 2024), <https://www.pointpark.edu/about/studentconsumerinformation/demonstrations-policy> [<https://perma.cc/DCX3-QGFA>].

<sup>6</sup> See *Kimberg v. Univ. of Scranton*, 411 F. App’x 473, 479 (3d Cir. 2010) (quoting *Swartley v. Hoffner*, 734 A.2d 915, 919 (Pa. Super. Ct. 1999)) (“the relationship between a private educational institution and an enrolled student is contractual in nature,” and “[t]he contract between parties is compromised of the written guidelines, policies, and procedures as contained in the written materials distributed to the student over the course of their enrollment in the institution.”).

<sup>7</sup> See, e.g., *Ala. Student Party v. Student Gov’t Ass’n of Univ. of Ala.*, 867 F.2d 1344, 1349 (11th Cir. 1989) (finding that a student government is a state actor when analyzing a First Amendment challenge to student government campaign finance regulations). SGA recognizes student groups and allocates university funds on behalf of PPU, so there is a clear principal-agent relationship. See *Student Planner and Handbook*, *supra* note 4 (“The Student Government Association (SGA) is a student governance system whose purpose is to act as the recognized communication channel between the students, faculty, and administration of Point Park University; advocate for and act as a protective body representing the students of Point Park University; allocate funds to student organizations and clubs; and appoint student members on faculty and general and standing committees and ad hoc committees, as appropriate. SGA is composed of an executive branch and a legislative body. Governance is codified by a constitution and bylaws.”).

<sup>8</sup> The protection of offensive speech is a “bedrock principle” of free speech. *Texas v. Johnson*, 491 U.S. 397, 414 (1989).

<sup>9</sup> See *Bd. of Regents of Univ. of Wis. Sys. v. Southworth*, 529 U.S. 217, 233 (2000) (“When a university requires its students to pay fees to support the extracurricular speech of other students, all in the interest of open discussion, it may not prefer some viewpoints to others.”); *Rosenberger v. Rectors of the Univ. of Va.*, 515 U.S. 819, 836 (1995) (“For the University, by regulation, to cast disapproval on particular viewpoints of its students risks the suppression of free speech and creative inquiry in one of the vital centers for the Nation’s intellectual life, its college and university campuses.”).

<sup>10</sup> *Rosenberger*, 515 U.S. at 829.

viewpoint discrimination, given that the denial was reportedly based on TPUSA's views and concerns around the chapter's advisor.

Nor may SGA burden TPUSA's associational freedom,<sup>11</sup> especially through guilt by association,<sup>12</sup> if it is to hold to PPU's free speech principles. SGA reportedly denied the TPUSA chapter recognition based on its association with Dowd and Kirk, whose ultimate infractions were expressing viewpoints unwelcome by some of those at PPU. Neither guilt by association nor viewpoint discrimination are compatible with the free exchange of ideas on a college campus.

Policies against viewpoint discrimination have been a vital protection for dissenting groups across the political spectrum. From racial equality to marijuana legalization to gay rights, these protections have shielded minority viewpoints throughout history—especially at historic junctures where these causes were unpopular.<sup>13</sup> If student governments or university administrators are permitted to deny recognition or funding because they or others object to a group's views, the rights of *all* such groups would be imperiled. And because SGA is an elected body, giving it unfettered discretion to determine group recognition subjects every group's ability to organize and speak on campus to what is effectively a popularity contest.

University recognition of a student organization is not an endorsement of that group, its speakers, events, or ideology. No reasonable person could believe otherwise at PPU, considering the more than 50 groups the SGA recognizes—many of whom work at cross purposes.<sup>14</sup> Rather, recognition is merely an acknowledgment that the group has met the stated criteria to receive university recognition. If recognition is to become contingent upon groups engaging only in palatable expression to select SGA members most sensitive to public opinion, there would be precious few clubs left for PPU students to join, as virtually every viewpoint is offensive to *someone*.

Given the ongoing threat to TPUSA's free speech rights, we request a substantive response to this letter no later than the close of business on May 26, 2026, confirming SGA will, upon application, reconsider TPUSA's chapter recognition and base its decision solely on viewpoint-neutral criteria.

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<sup>11</sup> See *Roberts v. U.S. Jaycees*, 468 U.S. 609, 622 (1984) (recognizing “a right to associate with others in pursuit of a wide variety of political, social, economic, educational, religious, and cultural ends”). “With the freedom to associate, minorities can show their numerical strength, influence policy, and stimulate competition in the marketplace of ideas. But take that freedom away and dissident expression stands particularly vulnerable to marginalization or outright suppression by the majority, leaving all of society poorer for it.” *First Choice Women's Res. Ctr., Inc. v. Davenport*, 2026 WL 1153029, at \*6 (U.S. Apr. 29, 2026) (cleaned up).

<sup>12</sup> *Healy v. James*, 408 U.S. 169, 186 (1972).

<sup>13</sup> For example, the principle of viewpoint neutrality protected chapters of LGBTQ organizations in Arkansas and New Hampshire in the 1970s and 1980s when student senates and university trustees, supported by state lawmakers, refused to “support a homosexual group” or their expression, which was, at the time, considered “shocking and offensive” by many. *Gay Students Org. of Univ. of N.H. v. Bonner*, 509 F.2d 652, 661–62 (1st Cir. 1974); *Gay & Lesbian Students Ass'n v. Gohn*, 850 F.2d 361, 362–63 (8th Cir. 1988).

<sup>14</sup> See *Student Organizations, Interest-Based Groups*, POINT PARK UNIV., <https://www.pointpark.edu/studentlife/sail/studentorganizations/index> [https://perma.cc/LCW3-5E9C].

Sincerely,



Garrett Gravley  
Program Counsel, Campus Rights Advocacy

Cc: Riley Mahon, President-elect, Student Government Association  
Keith A. Paylo, Dean of Students and Vice President of Student Affairs