FIRE
Foundation for Individual Rights and Expression

September 4, 2026

John O'Connor
Office of Student Conduct and Conflict Resolution
Northeastern University
204 Ell Hall
360 Huntington Avenue
Boston, Massachusetts 02115

Sent via U.S. Mail and Electronic Mail (jo.oconnor@northeastern.edu)

Dear Assistant Director O'Connor:

FIRE, a nonpartisan nonprofit that defends free speech,[1] is concerned that Northeastern University has threatened doctoral student Eleni (Selene) Michalopoulos with disciplinary action for continuing to email senior university administrators about concerns related to her dissertation research after telling her to limit her communications to "parties appropriate for [her] concerns[.]"[2] Michalopoulos's emails were spread out over several months, and sending such emails, even if undesired, would likely not rise to any level of unprotected expression. Since Northeastern has independently committed to upholding students' expressive rights,"[3]

[1] 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.

[2] Letter from John O'Connor, OSCCR Assistant Dir., to Eleni Michalopoulos, student (Aug. 25, 2026) (on file with author) ("future behaviors that reapply these concerns could rise to a level of severity in which formal conduct charges and referral to OSCCR could be applied."). Emails that Michalopoulos sent are also on file with author. We appreciate that you may have additional information which we invite you to share. To these ends, please find enclosed an executed privacy waiver authorizing you to speak with us about this matter.

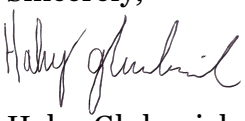
[3] *Demonstrations*, Free Expression, NORTHEASTERN UNIV., https://catalog.northeastern.edu/handbook/policies-regulations/demonstrations/ [https://perma.cc/X3GZ-W8XA] ("Northeastern has a responsibility to foster a community that protects and supports free expression, [and] welcomes open dialogue on critical issues[.]"); *Code of Student Conduct,* General Expectations, NORTHEASTERN UNIV. (revised Apr. 2026), https://catalog.northeastern.edu/handbook/code-student-conduct/#text [https://perma.cc/PL26-N5RB] (Northeastern recognizes students' "right to express their views publicly on any issue"). These commitments to free expression—and a reasonable student's interpretation thereof—are informed by decades of First Amendment jurisprudence.

it may not punish Michalopoulos for, or otherwise limit, her communications expressing concerns about her academics.[4]

While the quantity or relevance of Michalopoulos's emails may have displeased or annoyed some administrators, they do not rise to the level of speech that loses protection from Northeastern's commitment to free speech.[5] And receiving unwanted messages rarely rises to the level of material and substantial disruption the Supreme Court made clear is required before a school can punish expression.[6] With over 38,000 students and 4,800 staff, Northeastern administrators no doubt already receive a great number of emails each day. It is therefore difficult to see how multiple emails written and sent by a single student—spread over several months—have interfered with university operations or with administrators' ability to do their jobs. If any administrator does not wish to receive Michalopoulos's emails, they may simply delete them or decline to respond if they do not feel they are the appropriate contact for her concerns, just as employees of all kinds do with unsolicited or irrelevant emails daily.

Simply put, Northeastern's commitment to free speech protects Michalopoulos's speech. That Northeastern administrators may find the speech irrelevant or not wish to hear it is not a license to use the organs of university discipline to silence the speaker. It is therefore incumbent on the university to assure Michalopoulos that she will not face any punishment for emailing university leadership about her concerns and to not limit who she may contact. Given the ongoing threat to Michalopoulos's free speech rights, we request a substantive response to this letter no later than the close of business on September 11, 2026.

Sincerely,



Haley Gluhanich
Senior Program Counsel, Campus Rights Advocacy

Cc: Joseph E. Aoun, President
Ken Henderson, Chancellor
Waleed Meleis, Vice Provost for Graduate Education

Encl.

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[4] Students have the right to raise concerns with and urge action by public university officials. *See Borough of Duryea v. Guarnieri,* 564 U.S. 379, 388 (2011).

[5] *Unprotected Speech Synopsis*, FIRE, https://www.thefire.org/research-learn/unprotected-speech-synopsis (last visited Sept. 1, 2026). Mass emails are forms of expression protected by the First Amendment. *E.g., Rodriguez v. Maricopa Cty. Cmty. Coll. Dist.*, 605 F.3d 703, 710 (9th Cir. 2009) (finding that a professor's emails over campus listservs are "pure speech" and "the effective equivalent of standing on a soap box in a campus quadrangle and speaking to all within earshot.").

[6] *Tinker v. Des Moines*, 393 U.S. 503, 512 (1969) (quoting *Keyishian v. Bd. of Regents*, 385 U.S. 589, 603 (1967). In the university context, the protections described by the Court in *Tinker* are the floor for student expressive rights, not the ceiling. Even under *Tinker's* disruption standard, Michalopoulos's emails do not rise to level of a punishable disruption.

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Authorization and Waiver for Release of Personal Information

I, Eleni Michalopoulos, born on 01/28/1975, do hereby authorize Northeastern University (the "Institution") to release to the Foundation for Individual Rights and Expression ("FIRE") any and all information concerning my current status, disciplinary records, or other student records maintained by the Institution, including records which are otherwise protected from disclosure under the Family Educational Rights and Privacy Act of 1974. I further authorize the Institution to engage FIRE's staff members in a full discussion of all matters pertaining to my status as a student, disciplinary records, records maintained by the Institution, or my relationship with the Institution, and, in so doing, to fully disclose all relevant information. The purpose of this waiver is to provide information concerning a dispute in which I am involved.

I have reached or passed 18 years of age or I am attending an institution of postsecondary education.

In waiving such protections, I am complying with the instructions to specify the records that may be disclosed, state the purpose of the disclosure, and identify the party or class of parties to whom disclosure may be made, as provided by 34 CFR 99.30(b)(3) under the authority of 20 U.S.C. § 1232g(b)(2)(A).

This authorization and waiver does not extend to or authorize the release of any information or records to any entity or person other than the Foundation for Individual Rights and Expression, and I understand that I may withdraw this authorization in writing at any time. I further understand that my execution of this waiver and release does not, on its own or in connection with any other communications or activity, serve to establish an attorney-client relationship with FIRE.

I also hereby consent that FIRE may disclose information obtained as a result of this authorization and waiver, but only the information that I authorize.

Signed by:
8AE62B850D9A429...

Student's Signature

9/1/2026

Date