October 30, 2026

Marie McMullan
Program Manager and Counsel, SPFI
510 Walnut Street, Suite 900
Philadelphia, Pa

Re: Response to Your Letter Regarding the University Star

Dear Counsel McMullan:

I am writing in response to your October 29, 2026 letter regarding the University's actions relating to the University Star. After careful consideration of your organization's letter, the University respectfully but firmly disputes your assertion that it has violated the newspaper's First Amendment rights or infringed on its editorial independence or judgment.

The University recognizes and respects the editorial independence of the student newspaper, including its authority to exercise independent judgment over the content it publishes, including paid advertisements it prints in the paper. That independence, however, is distinct from the use of physical space within University buildings and the University's authority to establish and enforce policies governing that space. The University expects and requires the student newspaper to comply with University policies governing materials displayed within University buildings, including paid advertisements.

While the university supports the reasonable distribution of the University Star on its campus and the newspaper's right to raise money through paid advertisements printed in the paper, it has not opened on-campus rack displays as a public forum for any type of speech or advertisement. Such displays—to the extent they are allowed—remain subject to the University's reasonable, viewpoint-neutral restrictions.

As you noted, this issue arose because the University became aware that a paid political campaign advertisement was displayed in a University building in violation of UPPS

06.02.10, which limits electioneering to designated locations on campus and explicitly prohibits the display of campaign materials inside University buildings. This is a clear, viewpoint-neutral policy that applies to all campaigns and political viewpoints. As you acknowledge, a political campaign paid to display this advertisement in a University building. This is no different than if the campaign had posted the ad itself.

Furthermore, neither the newspaper nor the third-party vendor supplying the racks and advertisements had gone through proper university channels to secure authority to display paid advertisements in university buildings or other locations on campus. For this additional reason, the University removed all advertising from the news racks. The purpose of this action was not to penalize the University Star or inhibit its ability to generate funds from advertising, but rather to ensure compliance with University advertising policies and restrictions for displays on University property.

As previously stated, the University does not agree with your position and does not intend to alter its position on the matter. To be clear, any University-imposed restrictions on ad displays in University buildings or reasonable time, place, and manner restrictions on rack placement, do not interfere with the newspaper's editorial discretion to print paid advertisements in its paper or its First Amendment rights. Nevertheless, the University remains willing to continue discussions for a solution consistent with University policy. To that end, I recommend the University Star resume direct communications with the University Administrators identified in my transmittal email.

Should you have any further legal questions, please feel free to direct those to me.

Sincerely,

Nelly R. Herrera

Nelly R. Herrera
Vice Chancellor and General Counsel