



SPEECH FIRST

1300 I St. NW Suite 400E
Washington, DC 2005
speechfirst.org

January 31, 2024

Jonathan Sauls
Senior Associate Vice Chancellor of Student Success and Administration
Henry Owl Building CB #5000
230 East Cameron Avenue
Chapel Hill, NC 27599
919-966-4045
jsauls@email.unc.edu

By email

Re: Formal Complaint – Violations of UNC Policy 1300.8 and the Campus Free Speech Act by Members of Students for Justice in Palestine

Dear Mr. Sauls:

Speech First is a nationwide membership organization of students, alumni, and other concerned citizens dedicated to preserving civil rights secured by law, including the freedom of speech guaranteed by the First Amendment.

I write to submit a formal complaint on behalf of Speech First regarding violations of state law and University policy by the UNC chapter of Students for Justice in Palestine (“SJP”) on January 22, 2024. As you know, both UNC Policy 1300.8 and the Campus Free Speech Act prohibit students and student organizations from “substantially disrupt[ing]” or “substantially interfer[ing]” with “the rights of others to engage in and listen to expressive activity.” *See* Ex. A at 4; G.S. §116-300(7). Those prohibitions apply with particular force to disruptions of scheduled events. *See* Ex. A at 4. As explained in greater detail below, UNC students affiliated with SJP on January 22 openly violated both provisions last week.

On June 19, 2023, the UNC College of Arts and Sciences Program for Public Discourse invited Duke University professor Frank Bruni and journalist Bari Weiss to speak on campus as part of its Abbey Speaker Series. *See* Ex. B. The event, scheduled for the evening of January 22nd, 2024, was intended to foster “a discussion of objectivity in journalism.” *Id.* On January 16, 2024, UNC’s SJP chapter announced plans to disrupt the event through a “walkout.” Ex. C. The announcement stated that “Bari Weiss and her lies are NOT welcomed [sic] on campus” and included a link to a Google form that students could use to sign up for the “walkout.” Ex. D. The form “urged the protest participants to arrive at UNC’s student union at 5:30 PM” to make sure they obtained the limited number of free tickets available. *Id.*

SJP’s euphemisms notwithstanding, the “walkout” was nothing less than an all-out attempt at a heckler’s veto. Twenty-five minutes into the event, a large number of students flooded the aisles of the auditorium, chanting and shouting down the speakers. The event was brought to a standstill for several minutes until the students—who were warned that they were violating the Campus Free Speech Act—were removed from the room by campus security. *See id.* According to the Carolina



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Alumni Review, the sustained outburst temporarily “forc[ed] Bruni and Weiss to stop speaking.” Ex. E. A partial video of the disruption and interference can be found at the following link: bit.ly/3SkWVeh.

Policy 1300.8 states that “[a]ny University student, faculty member, or staff employee who is found to have ... substantially interfered with the protected free expression rights of others shall be subject to a full range of disciplinary sanctions.” Ex. A at 4. Moreover, UNC’s 2023-2024 Registered Student Organizations Handbook states that a student organization’s “[r]egistration may be withdrawn or denied should it be determined that ... the organization fails to comply with University policies” or “if the organization fails to comply with applicable federal, state, or local laws.” Ex. F at 13.

Accordingly, Speech First respectfully requests that the University initiate disciplinary proceedings against all students who participated in the January 22, 2024, shutdown of Ms. Weiss’s speech. Speech First further requests that the University (1) investigate whether the UNC chapter of Students for Justice in Palestine conspired to prevent an invited speaker’s exercise of free expression in violation of University policy; and (2) hold the chapter accountable by removing its status as a University-recognized organization if such misconduct is found to have occurred.

Respectfully,

Cherise Trump
President of Speech First, Inc.

Enclosures: Exhibits A-F