



March 15, 2021

Stacy R. Purcell
Vice President and General Counsel
Eastern Virginia Medical School
Office of the General Counsel
Waitzer Hall
Norfolk, Virginia 23501

Sent via Electronic Mail (purcelsr@evms.edu)

Dear Vice President Purcell:

Thank you for your response of February 17, 2021, to FIRE's February 2 letter raising concerns with the denial of recognition of the proposed Eastern Virginia Medical School chapter of Students for a National Health Program.

You asserted that the chapter was denied recognition not because of the group's views or advocacy, but because it failed to satisfy objective standards set forth in the school's Criteria for Approval of a New Student Organization. These representations cannot be substantiated.

First, FIRE is puzzled by your assertion that the group failed to submit a constitution. The group submitted a constitution, enclosed, on December 2, 2020, more than a month before the January 7, 2021, email denying the chapter recognition.¹

Second, although your response asserts that SNaHP failed to provide satisfactory "ideas, goals and sustainability measures," the EVMS Student Government Association (SGA) did not communicate this rationale for denial to the student group when it made its decision, rendering the group unable to rectify these alleged deficiencies until we shared your response

¹ According to the student government, new student groups are directed to upload their constitution to a shared Google Drive folder, which SNaHP did on December 2, 2020. EVMS Student Government Association, *Constitutions for New Student Organizations*, GOOGLE DRIVE (last visited Feb. 24, 2021), <https://tinyurl.com/xuzd9pwc> (showing that SNaHP uploaded its constitution on December 2, 2020). A screenshot of that submission is enclosed.

with them. Instead, the SGA expressly premised its denial on “clubs based on opinions, political or otherwise” and doubts about whether the group’s “mission” was “necessary[.]”²

FIRE appreciates that EVMS has invited the group to reapply for recognition. The chapter has now reapplied by submitting its constitution and revamped materials that seek to address the issues mentioned in your response. This submission—as did the initial submission—satisfies the SGA’s criteria for recognition.

FIRE looks forward to the expedient viewpoint-neutral processing of SNaHP’s application for recognition, which would allow the group to fully realize the rights EVMS is legally obligated to provide as a public institution bound by the First Amendment. Short of that, be advised that FIRE is committed to using the full resources at its disposal to vindicate this continued deprivation of the fundamental rights of EVMS students.


Sincerely,






A handwritten signature in black ink, appearing to read "Zach", with a stylized flourish extending from the end.

Zachary Greenberg
Senior Program Officer, Individual Rights Defense Program

Encl.

² Email from Riley Suter, Student Government Association Vice President, to SNaHP group leadership (Jan. 7, 2021) (on file with author).

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Eastern Virginia Medical School Students for a National Health Program (EVMS SNaHP)

Article I: NAME

Section 1.1. The name of the organization shall be Eastern Virginia Medical School Students for a National Health Program (EVMS SNaHP).

Article II: MISSION STATEMENT

Section 1.2. The mission of this organization shall be to promote the national, comprehensive single-payer national health insurance in the United States of America. This will be achieved by obtaining the most generous of physicians and health care providers, as EVMS does, from either external American healthcare sources and the necessary reforms to make quality, cost-effective healthcare accessible to all Americans.


This organization is an official arm of Physicians for a National Health Program (PNHP), and as such, is aligned with PNHP in all of its values and goals.

Article III: MEMBERSHIP


Any student currently enrolled at Eastern Virginia Medical School will be considered an eligible member. Students currently enrolled at all campuses (DVM, MPH, MBA, MPA, PhD, MS, AAS) offered by EVMS may be members of the organization.


Article IV: EXECUTIVE COMMITTEE MEMBERS

Section 1.4. The Executive Committee of EVMS SNaHP shall be President, Vice President, Secretary, and Treasurer. In addition, the executive committee may choose to create

 Constitution of EVMS SNaHP

Medicaid Enrollment Team Constitution



 Medicaid Enrollment Team Const...

Constitution of the Eastern Virginia Medical School Ping Pong Club

Article I: NAME

Section 1.1. The name of this organization shall be Eastern Virginia Medical School Ping Pong Club.

Article II: MISSION STATEMENT

Section 1.2. The purpose of this organization shall be to provide an opportunity to learn, practice and play ping pong for

1. All EVMS students

2. Other interested parties appropriately affiliated with Eastern Virginia Medical School

Article III:

Constitution of the Eastern Virginia Medical School Ping Pong Club

Article I: NAME

Section 1.1. The name of this organization shall be known as the Eastern Virginia Medical School Ping Pong Club.



Article II: MISSION STATEMENT

Section 1.2. The purpose of this organization shall be to provide an opportunity to learn, practice and play ping pong for

1. All EVMS students


2. Other interested parties appropriately affiliated with Eastern Virginia Medical School

Article III:

 Constitution of EVMS SNaHP 

Details Activity

Type	Google Docs
Size	0 bytes
Storage used	0 bytes
Location	 Constitutions for New Stud
Owner	me
Modified	Dec 2, 2020 by me
Opened	Dec 3, 2020 by me
Created	Dec 2, 2020 with Google Docs