



**OLD DOMINION UNIVERSITY**  
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November 19, 2021

**Via email only**

Adam Steinbaugh, Esq.  
Director, Individual Rights Defense Program  
Foundation for Individual Rights in Education  
510 Walnut Street  
Suite 1250  
Philadelphia, PA 19106

Dear Mr. Steinbaugh:

Thank you for your letter of November 17, which President Hemphill has forwarded to me for response.

I appreciate your interest in freedom of expression at Old Dominion University. I can assure you that the free exchange of ideas is a core value of our university, and that the University is in full compliance with its First Amendment and other speech-related obligations.

Dominion Rock is used and managed exclusively by our student body for the purposes of painting messages. It is my understanding that the painting over of Dominion Rock that you describe was carried out by a student. So far as I am aware, no employee or other representative of the University was involved in any way.

Thank you again for your interest.

Sincerely,

*Allen T. Wilson*

Allen T. Wilson  
University Counsel

cc: Brian O. Hemphill, President  
Danielle Carter, President, Old Dominion University Student Government Association