



March 14, 2022

Laurie Nichols
Assistant Vice President for Administrative Services/HRO
California State University Channel Islands
1 University Drive
Camarillo, California 93012

Sent via U.S. Mail and Electronic Mail (laurie.nichols@csuci.edu)

Dear Ms. Nichols:

Thank you for your March 4 response to FIRE's February 17 letter concerning California State University Channel Islands' directive to student Bailey Morris that she refrain from making "ad hominem" arguments or criticizing the "character" of university employees. We appreciate your assurance that CSUCI has not and will not take disciplinary action against Morris or any other student except action within the lawful bounds of the university's Student Conduct Code.

Nevertheless, the overbroad directive to Morris remains in effect and expressly prohibits her from engaging in speech that is outside CSUCI's authority to punish under the First Amendment. As we previously explained, the First Amendment firmly protects even harsh criticism of government actors, including criticism of public university employees. Left in place, the warning will chill Morris's exercise of her constitutional right to free expression. If CSUCI intends to respect legal limits on its authority to regulate speech, we presume the university has no objection to rescinding a directive that indicates otherwise.

FIRE again calls on CSUCI to explicitly rescind Morris's disciplinary warning over her lawful communications with university staff. We request a substantive response to this letter, confirming the university will lift the unconstitutional restriction, no later than close of business on March 21, 2022.

Sincerely,

Aaron Terr
Senior Program Officer, Individual Rights Defense Program

Cc: Richard Yao, Ph.D., President
William Nutt, Manager of Institutional Equity and Interim Title IX Coordinator