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Media Outlets and Newsroom Leaders*

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

The Stanford Daily Publishing Corp., *et al.*,

Plaintiffs,

v.

Marco Rubio, in his official capacity as
Secretary of State, *et al.*,

Defendants.

Case No. 5:25-cv-06618-NW

**[Proposed] *Amici Curiae* Brief of Student
Press Law Center, Associated Collegiate
Press, College Media Association, and
Fifty-five Student Media Outlets and
Newsroom Leaders in Support of Plain-
tiffs' Motion for Summary Judgment**

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Corporate Disclosure Statement

None of the following proposed *amici curiae* corporations have a parent corporation or any publicly held corporation owning 10 percent or more of its stock:

- Student Press Law Center
- Associated Collegiate Press
- College Media Association
- The Brown Daily Herald Incorporated, d/b/a *The Brown Daily Herald*
- The Cavalier Daily, Inc. d/b/a *The Cavalier Daily*
- The Daily Pennsylvanian Inc., d/b/a *The Daily Pennsylvanian*
- The Daily Princetonian Publishing Company, d/b/a *The Daily Princetonian*
- The Dartmouth, Inc. d/b/a *The Dartmouth*
- The Harvard Crimson, Inc. d/b/a *The Harvard Crimson*
- Illini Media Company, d/b/a *The Daily Illini*
- Independent Berkeley Students Publishing Company, Inc., d/b/a *The Daily Californian*
- Maryland Media, Inc. d/b/a *The Diamondback*
- The Red & Black Publishing Co. d/b/a *The Red & Black*
- Washington University Student Media, Inc. d/b/a *Student Life Newspaper*
- World Series Way Publishing Company, Inc. d/b/a *The Huntington News*
- Yale Daily News Publishing Co., Inc., d/b/a *Yale Daily News*

ASUCLA Communications Board d/b/a *The Daily Bruin* is a division of Associated Students UCLA, a nonprofit organization that does not have a parent corporation or any publicly held company owning 10 percent or more of its stock.

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Identity and Interest of *Amici Curiae*¹

The Student Press Law Center (“SPLC”) is a national, nonprofit, nonpartisan organization established in 1974. SPLC is the only organization in the United States focused exclusively on promoting, supporting, and defending the rights of high school and college journalists.

The Associated Collegiate Press (“ACP”) is a national, nonprofit, nonpartisan organization established in 1921. ACP is the largest and oldest national membership organization for college student media in the United States.

The College Media Association (“CMA”) is a national, nonprofit, nonpartisan organization established in 1955. CMA is the only organization focused exclusively on educating, supporting, and defending the rights of college media advisers and their students.

SPLC, ACP, and CMA are joined by 55 student media outlets and newsroom leaders,² who—like Plaintiff The Stanford Daily Publishing Corporation—carry out important, and increasingly vital, work to inform their communities and who rely in part on noncitizen staffers, contributors, and sources who are lawfully present in the United States on student visas. These *amici curiae* (collectively, the “Student Press Amici”) therefore have a profound interest in ending the government’s unlawful application of the Revocation Provision and Deportation Provision to retaliate against noncitizen students for their speech.³

The Student Press Amici accordingly submit this brief to emphasize the importance of the work of a student press that reflects a diverse range of viewpoints and voices; to detail the real, persistent, and devastating chilling effect that the government’s attack on disfavored speech has had on student-led newsrooms like *The Stanford Daily*; and to explain the potential

¹ This brief was authored entirely by counsel for the Student Press Amici and not by counsel for any party, in whole or in part. No party or counsel for any party contributed money to fund the preparation or submission of this brief. Apart from the *amici curiae* and their counsel, no one contributed money to fund the preparation or submission of this brief.

² These additional *amici* are identified in Appendix A to this brief.

³ As used in this brief, these terms carry the same meaning as those applied in Plaintiffs’ Motion. See Dkt 32-1 at 3.

1 long-term harms that will flow from allowing the government to continue its unlawful, anti-
 2 constitutional campaign to stifle speech and speakers it dislikes.

3 I. Introduction

4 Here is the problem in concrete terms: Sure, it has gotten easier to
 5 publish, say, an op-ed you wrote for the campus newspaper through
 6 the internet. But how many people will actually read it? And what is
 7 the probability that the United States government is the one that
 8 does and decides to take issue with it? It's becoming less and less
 9 worth it to take that chance, for anyone. And, if dissent is an indis-
 10 pensable component of democratic enterprise, that's a problem —
 11 especially for student journalism.

12 This is a precarious moment in higher education where every uni-
 13 versity desperately needs a witness. Regardless of whether they are
 14 read, student newspapers are crucial bodies of historical information
 15 for universities. Through first-person op-eds or interviews in news
 16 articles, they provide consistent and formalized ways of document-
 17 ing the perspectives of community members. If students believe it is
 18 no longer worth it to share their thoughts in a documented capacity
 19 — due to the prospect of being deported, detained or otherwise pun-
 20 ished — we simply cannot do our jobs.

21 Alice Qin, *Protecting student journalism: Rumeysa Ozturk and the tilting risk-reward equation of*
 22 *free speech*, The Duke Chronicle (Apr. 18, 2025), <http://bit.ly/48TKHD3>.

23 The First Amendment prohibits the government from “retaliating against individuals
 24 for engaging in protected speech.” *Lozman v. Riviera Beach*, 585 U.S. 87, 90 (2018). That pro-
 25 tection applies equally to citizens and noncitizen residents alike. *See, e.g., Bridges v. Wixon*, 326
 26 U.S. 135, 148 (1945) (“Freedom of speech and of press is accorded aliens residing in this coun-
 27 try.”). And when the threat of retaliatory action “would chill or silence a person of ordinary
 28 firmness from future First Amendment activities,” the Constitution draws no distinction be-
 29 tween directly punishing someone for what they said and frightening them into silence before
 30 they said it. *See Mendocino Env'tl. Ctr. v. Mendocino Cnty.*, 192 F.3d 1283, 1300 (9th Cir. 1999).

31 The Student Press Amici submits this brief in support of Plaintiffs because current and
 32 former student journalists—including those who work at *The Stanford Daily* and untold num-
 33 bers of their peers, citizen and noncitizen alike, at student media outlets across the United
 34 States—have seen their work and the vital lessons they learn from it hampered for the better

1 part of a year of by the unconstitutional chilling effects of the government’s attack on disfa-
 2 vored political speech by noncitizen students. The Court should grant Plaintiffs’ motion and
 3 enjoin Defendants from unconstitutionally applying the Revocation Provision and Deportation
 4 Provision to punish international students for their protected speech activity. The stakes for
 5 student journalism, journalism education, and the democratic values underlying those pursuits
 6 could hardly be higher.

7 *First*, beyond its indispensable benefit to the communities it serves, the student press
 8 imparts fundamental pro-democratic values on those who practice and engage with it. These
 9 lessons are taught equally to those noncitizen student journalists, sources, and contributors,
 10 whose experience with student journalism in the United States can have a force multiplier ef-
 11 fect abroad.

12 *Second*, the government’s unlawful application of the Revocation Provision and Depor-
 13 tation Provision has harmed student journalists across the country, regardless of their citizen-
 14 ship status. Contrary to Defendants’ suggestion, *see* Defs’ Cross-MSJ (Dkt 33) at 13, the
 15 chilling effects arising from their unconstitutional actions are widespread and devastating.

16 *Third*, if not enjoined, the threat of visa revocations to punish disfavored speech will
 17 inflict further harm on student newsrooms. A free press cannot thrive in an atmosphere of fear,
 18 whether the threat comes from a university dean or a federal deportation order. International
 19 student enrollment is cratering in response to the threat of visa revocations and deportations
 20 over social media posts or statements deemed to be “anti-American” or otherwise claimed by
 21 the government to be vaguely against U.S. interests. Current policies that drive international
 22 students away or compel them to self-censor have stripped campus media of the diverse voices
 23 necessary to provide the public with a full and accurate understanding of their communities.
 24 An unchecked system of government retaliation for protected speech activity will certainly ex-
 25 pand a broader culture of government-led or government-pressured investigations into and ret-
 26 ribution against student journalists who may report on politically sensitive issues.

1 For these reasons, the Student Press Amici ask the Court to grant Plaintiffs’ Motion
 2 for Summary Judgment and enjoin the government’s unlawful attack on disfavored student
 3 speech.

4 **II. Argument**

5 **A. Student media instill democratic and civic values.**

6 Student-run newsrooms are where young journalists learn by doing—interviewing, in-
 7 vestigating and publishing news that serves their communities. But student media outlets are
 8 far more than training grounds for future journalists; they provide a forum for democratic en-
 9 gagement for all participants.

10 For one, as local professional news coverage has declined, student publications increas-
 11 ingly fill critical gaps in public information. *See, e.g.,* Zach Metzger, *The State of Local News:*
 12 *Executive Summary*, Local News Initiative (Oct. 23, 2024), <http://bit.ly/46Us0wn> (reporting
 13 decline of 3,300 local newspapers in the United States since 2005 and the loss of more than
 14 7,000 newspaper jobs between 2022-2023 alone). As a result of various market and structural
 15 factors, nearly 55 million people in the United States now have limited or no access to local
 16 news—making the student press more indispensable than ever. *See id.; see also* Dan Levin,
 17 *When the Student Newspaper Is the Only Daily Paper in Town*, N.Y. Times (Oct. 19, 2019),
 18 <https://nyti.ms/3reRON1> (describing, among other examples, *The Michigan Daily*’s staff of
 19 300 student journalists working in Ann Arbor, Michigan, “to provide incisive coverage about
 20 the city’s police, power brokers, and policymakers, all while keeping up with school”).

21 Beyond serving as an increasingly essential news source, student media teaches both its
 22 practitioners and readers—citizens and noncitizens alike—the principles of inquiry, critical
 23 thinking and reasoned debate central to democracy. Learning about these tools of civic engage-
 24 ment and how best to use them as journalists is a critical part of the U.S. educational experi-
 25 ence. The United States Supreme Court emphasized this long ago when it rejected the idea
 26 that “no official, high or petty, can prescribe what shall be orthodox in politics, nationalism,
 27 religion, or other matters of opinion.” *See W. Va. State Bd. of Educ. v. Barnette*, 319 U.S. 624,
 28 642 (1943). Indeed, “educating the young for citizenship” while protecting their constitutional

1 freedom to disagree with the government is necessary “if we are not to strangle the free mind
 2 at its source and teach youth to discount important principles of our government as mere plat-
 3 itudes.” *Id.* at 637.

4 The recognition of student journalism’s role in instilling these values has gained in-
 5 creasing resonance. State legislatures, for example, have enacted New Voices laws protecting
 6 student journalists’ rights and recognizing the civic and pedagogical benefits a robust and free
 7 student press provides. *See, e.g.*, W. Va. Code § 18B-21-2(a)-(b) (affirming that “student press
 8 can contribute to the continuing development of informed and civic-minded citizens” and
 9 those involved in its practice should be protected “in order to encourage students to become
 10 educated, informed, and responsible members of society”); 2022 Haw. Laws, ch. 24 § 2 (“al-
 11 lowing student journalists at the University of Hawaii to exercise freedom of speech and free-
 12 dom of the press in school-sponsored media and protecting their advisors from retaliation for
 13 refusing to censor their students is a matter of statewide concern”).

14 When the government makes dissent a deportable offense, it betrays the very lessons
 15 our schools exist to teach.

16 The impact of these lessons and how they shape our shared futures, moreover, is not
 17 limited to American shores. When international students get involved in American student
 18 journalism, they develop a bond with the United States and its democratic values that goes far
 19 beyond the “only temporary and tenuous connection[]” that Defendants assert our interna-
 20 tional student visitors retain. *See* Defs’ Cross-MSJ. The government has previously and
 21 properly recognized that a free and vibrant press—in societies where it operates—is “essential
 22 for effectively promoting respect for human rights and fundamental freedoms, strengthening
 23 democratic institutions, and fostering resilient societies that are peaceful, prosperous, and in-
 24 clusive.” *See* Report to Congress on Protection of Civil Society Activists and Journalists, U.S.
 25 Dep’t of State, <https://2021-2025.state.gov/wp-content/uploads/2022/06/Report-to-Con->
 26 [gress-on-Protection-of-Civil-Society-Activists-and-Journalists.pdf](https://2021-2025.state.gov/wp-content/uploads/2022/06/Report-to-Congress-on-Protection-of-Civil-Society-Activists-and-Journalists.pdf) (last accessed Oct. 13,
 27 2025), at 1. And when our First Amendment values are exported abroad, it “helps support
 28 transparency and accountability, promote rule of law, and expose corruption.” *See id.*

B. The government’s unlawful application of the Revocation Provision and Deportation Provision have inflicted widespread harm on student media and its audience as valuable contributors and sources have gone silent in response to the government’s threats.

Contrary to Defendants’ assertions, the chilling effects of the government’s actions are real, widespread, and well-documented. Student journalists—especially noncitizen students—report declining participation, self-censorship, and withdrawal from public discourse. Each of these results inflict harm not only on individual students but also on the broader educational and democratic mission of the student press.

The government’s high-profile arrests of Mahmoud Khalil, Mohsen Mahdawi, and Rümeysa Öztürk in early 2025—and its audacious characterization of their speech as cause for removal from the United States—sent a clear message to international students: Say or write something that this administration does not like, and the government may grab you off the street, call you a terrorist sympathizer, lock you up in a distant detention facility, and ultimately kick you out of the country. *See, e.g.*, Plfs’ Mot. at 6-7.

Almost immediately after news of those actions spread, and with Defendant Rubio’s vow to engage in large-scale revocations of F-1 visas based on students’ expression, student-run newsrooms across the United States began experiencing a crisis of unprecedented scale. Former contributors began calling to have their articles or op-eds removed or scrubbed of identifying details, lest they be subjected to visa revocation like Öztürk or other adverse immigration consequences based on their published speech. International students who were planning to write articles, op-eds, or letters to the editor about Palestine, ICE, immigration, or other topics that may draw unwanted attention from the government began withdrawing their submissions. The Student Press Law Center received a surge of calls through its hotline as student journalists began finding it difficult to convince international students and others to speak on the record for news articles or commentary on those issues.

Within 10 days of Öztürk’s arrest, SPLC and five other national student media organizations issued a national alert advising student journalists on how best to try to navigate the fallout. *See, e.g.*, Samantha Henry, *Journalism Advisory Organizations Issue Rare Alert to Student*

1 *News Outlets*, Nieman Reports (Apr. 7, 2025), <http://bit.ly/3KGfA3V>. The alert advised stu-
 2 dent newsrooms that the government’s actions to deport international students “demand ur-
 3 gent and unprecedented attention from student media in the United States” because nonciti-
 4 zen student speakers “have faced severe consequences” over their legally protected speech,
 5 “including visa revocation, detention, deportation or bans on reentry.” *See* SPLC News, *Stu-*
 6 *dent media groups warn of unprecedented threats*, SPLC (Apr. 4, 2025), <http://bit.ly/493gu4z>.
 7 And the groups urged student media organizations to “revisit their policies on takedown re-
 8 quests and anonymous sources, particularly for those whose immigration status may make
 9 them targets for their lawful speech.” *Id.*

10 In the weeks and months since, student journalists and their campus communities have
 11 continued to struggle through the chilling effect of the government’s actual and threatened use
 12 of the Revocation Provision and Deportation Provision to punish disfavored speech. *See, e.g.,*
 13 Christine Fernando, *College journalists wrestle with transparency as students fear deportation for*
 14 *speaking out*, Associated Press (Apr. 25, 2025), <http://bit.ly/42YMbbq> (“The need to consider
 15 high-stakes safety risks has increased pressure on students in newsrooms that are meant to be
 16 learning labs for future journalists.”). For example:

- 17 • The editor-in-chief of the *Columbia Political Review*, doubting
 18 that “it’s a coincidence that we’re getting more of these requests
 19 than we ever had before,” reported having received half a dozen
 20 requests from international students and others “wanting to put
 the publishing process on hold” and as many seeking to remove
 published articles. *Id.*
- 21 • *The Alestle* at Southern Illinois University had to depart from its
 22 policy regarding anonymity for a then-upcoming article about
 23 eight international students whose visas had been revoked, even
 24 as experts caution that reliance on unnamed sources can hinder
 credibility. *Id.*
- 25 • The leader of Ohio State University’s *The Lantern* said the im-
 26 pact of the government’s visa-revocation and deportation ac-
 27 tions—including visa revocations of 12 students at her univer-
 sity—and the resulting “pressure to do the right thing” had in-
 28 flicted “a mental toll” on newspaper staff. *Id.*

- A staff writer at *F Newsmagazine*, at the School of the Art Institute of Chicago, told her publication that “I feel an underlying fear that any choice could be the wrong move that gets my student visa revoked.” See Sidne K. Gard, *When Speech Isn’t Free*, *F Newsmagazine* (Apr. 27, 2025), <http://bit.ly/478PZrX>.

There’s more: At Northeastern University’s newspaper, the editor-in-chief received “an influx of requests from worried students that The Huntington News anonymize quotes, remove photos and take down some articles entirely for their safety.” See Elias Schisgall, *With International Students at Risk, Campus Newspapers Loosen Editorial Policies*, *Nieman Reports* (Apr. 17, 2025), <http://bit.ly/4neb22t>. And because “the landscape has changed enough where international students maybe aren’t going to be able to fully complete their education in the United States, or there’s a threat of them being arrested” over what they wrote for publication, *The Michigan Daily* at the University of Michigan retroactively anonymized two articles written by international students. *Id.*

As the 55 *amici curiae* on this brief representing America’s student media can attest firsthand, student-run newsrooms across the country have received similar requests since the government’s anti-immigrant and anti-speech crackdown. At *The Daily Tar Heel*, where the University of North Carolina newspaper agreed to remove columns over retaliation concerns. *Id.* At *The Exponent* at Purdue University, which reasoned that “it’s unorthodox” to remove previously published content “but the situation we’re in now is unorthodox” because when else “has the federal government ever said something so blatant as ‘You protest on this issue, you’re under threat’?” *Id.*; see also, e.g., Emily Spatz, *Letter from the Editor: Clarifying our anonymity policies in an unprecedented time*, *The Huntington News* (Apr. 23, 2025), <http://bit.ly/3VRpToa> (“Since President Donald Trump took office in January, The Huntington News has seen an increased number of sources ask for anonymity, refuse to speak to reporters out of fear and even request to unpublish pieces that expressed positions critical of the United States government.”); Editorial Board, *Changes in The Dickinsonian’s editorial policy*,

1 The Dickinsonian (Sept. 18, 2025), <http://bit.ly/4oi8z7N> (explaining changes to policy to al-
 2 low grants of anonymity to “international students who may be at legal risk if they voice certain
 3 opinions or experiences”).

4 So, too, at *The Harvard Crimson* and *The Rice Thresher*. See Lauren Watson, *Student*
 5 *Journalists Wrestle with Censoring Their Own Work*, Columbia Journalism Review (Apr. 17,
 6 2025), <http://bit.ly/4mZU5sn>. That same fear reaches beyond international students who
 7 have submitted material for publication. It understandably compels those students to exercise
 8 extreme caution as sources, often depriving the student press of important voices. For example,
 9 the editor-in-chief of the *Independent Florida Alligator* conveyed her newsroom’s experience
 10 confronting sources who are international students who, “especially in Florida, are just really
 11 afraid that there’s going to be repercussions for the things they say that get printed.” *Id.*

12 And at *The Duke Chronicle*, Ms. Qin’s conclusion that “we simply cannot do our jobs”
 13 when international voices are chilled was not an assumption. See Alice Qin, *Protecting student*
 14 *journalism: Rumeysa Ozturk and the tilting risk-reward equation of free speech*, The Duke Chroni-
 15 cle (Apr. 18, 2025), <http://bit.ly/48TKHD3>. Rather, she experienced the harm firsthand when
 16 she and an international student who was planning to contribute a “beautifully written” op-ed
 17 decided not to run it over deportation concerns. *Id.* Ms. Qin and the writer recognized the
 18 concept—as the government refuses to do in this case—that “[t]he probability of deportation
 19 as a result of this specific op-ed is indeterminable, but recent news cycles convey that it is now
 20 nonzero.” *Id.*

21 Given the risk of deportation, the loss of educational opportunities and the prospect of
 22 “tremendous personal harm” upon return to their home countries *see id.*, it is inaccurate to
 23 characterize such an agonizing choice—and similar ones that have repeatedly played out in
 24 similar conversations—as reflecting students “making their own independent decisions” un-
 25 der anything less than duress. See Defs’ Cross-MSJ at 13. These responses to high-profile ar-
 26 rests and attempted removals of international students for no more than their speech—and the
 27
 28

1 news of revocation of *thousands* of international student visas in the wake of those incidents⁴—
 2 are as rational as they are all but compelled on those making the “independent decision” to
 3 remain silent on political issues. As the United States Supreme Court has made clear, “the
 4 threat of sanctions may deter almost as potently as the actual application of sanctions” and
 5 “[t]he danger of that chilling effect upon the exercise of vital First Amendment rights must be
 6 guarded against.” *Keyishian v. Bd. of Regents*, 385 U.S. 589, 604 (1967) (quoting *NAACP v.*
 7 *Button*, 371 U.S. 415, 433 (1963)) (cleaned up).

8 That compelled silence harms the noncitizen student who suffers it. But the injury is
 9 felt far more broadly. Targeting international student journalists doesn’t just punish speech—
 10 it erases perspective. International student journalists bring worldviews shaped by different
 11 political systems, cultures, and lived experiences. Their participation enriches campus dia-
 12 logue, broadens understanding of global issues, and exposes all students to the practice of de-
 13 mocracy as both an American ideal and a universal value. And limiting that exposure harms not
 14 only the noncitizen student who wishes to speak but also those who wish to hear them—even
 15 when the message is one the government dislikes. *See, e.g., Stanley v. Georgia*, 394 U.S. 557,
 16 564 (1969) (The “right to receive information and ideas, regardless of their social worth, is
 17 fundamental to our free society.”); *Lamont v. Postmaster Gen.*, 381 U.S. 301, 306–07 (1965)
 18 (holding that law interfering with dissemination of communist propaganda was “an unconsti-
 19 tutional abridgment” of the right to receive the material). By reducing the comprehensiveness
 20 or perceived reliability of their coverage, the government’s unlawful conduct here frustrates
 21 the work of student newsrooms who seek to serve and promote the First Amendment princi-
 22 ples that are a necessary condition to informed self-governance.

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27 ⁴ *See, e.g.,* Frances Vinall, *Over 6,000 student visas revoked for crimes and overstays, U.S. says*,
 28 Wash. Post (Aug. 19, 2025), <http://bit.ly/3IGsTAR>.

C. The government’s unlawful application of the Revocation Provision and Deportation Provision threatens enduring harm to journalism education and civic discourse.

In addition to the real harm that the Defendants’ actions have already caused, the ongoing threat of visa revocation to punish disfavored speech threatens to inflict ongoing and lasting harm on student newsrooms.

For one, the threat of being deported for lawful expression of ideas deemed “anti-American” will continue to reduce international student enrollment and prompt further self-censorship by those who remain, exacerbating the deprivation of essential diversity of perspective from campus media. Enrollment by international students has already plummeted in the wake of the government’s crackdown against expression of government-disfavored views. The effect was nearly immediate as news of the Defendants’ actions spread, with the number of F-1 visas issued for international students bound for the United States dropping by more than 20 percent in May 2025 compared to May 2024. *See* Ashley Mowreader, *International Student Visa Issuances Dropped in May*, Inside Higher Ed (July 17, 2025), <http://bit.ly/48ShAzW>. It has continued in the months since: By the fall semester, the number of international-student arrivals saw the largest recorded decline outside of the first year of the COVID-19 pandemic. *See* Aatish Bhatia and Amy Fan, *Nearly 20 Percent Fewer International Students Traveled to the U.S. in August*, N.Y. Times (Oct. 6, 2025), <http://bit.ly/46XCwTw>; Elissa Nadworny, *Colleges see significant drop in international students as fall semester begins*, NPR (Aug. 27, 2025), <http://bit.ly/4nIk4Wp>; *see also, e.g.*, Kayla Huynh, *Amid visa restrictions, international freshmen enrollment plummets at UW-Madison*, Milwaukee Journal Sentinel (Sept. 29, 2025), <http://bit.ly/3VVIKyu> (reporting more than 30 percent decrease in freshman enrollment at the University of Wisconsin-Madison, the largest decline in at least a decade).

The sharp drop in the number of international students necessarily makes for a smaller pool of contributors to student publications who have unique perspectives on global, and local, issues. And the increasingly smaller number of international students who remain or continue to study in the United States will continue to self-censor in the ways that we have already seen.

1 *See above* at 6–10. The result will be an increasing homogenization of editorial voices that results
 2 in a less-informed audience.⁵

3 Further, if left unchecked, the atmosphere of fear and compelled deference to the gov-
 4 ernment’s whim that is currently stoked by the unlawful threats of visa revocations will un-
 5 doubtedly expand to citizens who engage in student journalism. Indeed, it already has.

6 For example, in spring 2025, the Office of Institutional Equity at Columbia University
 7 formally accused two students, both U.S. citizens, of “discriminatory harassment” and initi-
 8 ated disciplinary proceedings in connection with an op-ed published by the *Columbia Spectator*
 9 that was critical of Israel. *See* Daksha Pillai and Spencer Davis, *Office of Institutional Equity*
 10 *investigates Palestinian activists following Spectator op-ed*, *Columbia Spectator* (Apr. 22, 2025),
 11 <http://bit.ly/4o1VT50>. That investigation arose in the context of the university’s agreement
 12 with the government to, among other things, adopt the government’s preferred definition of
 13 antisemitism and police speech that falls within its sweep. *See, e.g.*, Jake Offenhartz, *Under*
 14 *threat from Trump, Columbia University agrees to policy changes*, AP (Mar. 21, 2025),
 15 <http://bit.ly/4pVNKkp> (reporting that the university “acquiesce[ed] to an extraordinary ulti-
 16 matum by the Trump administration to implement those and other changes or risk losing bil-
 17 lions of dollars in federal funding”).

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 20 ⁵ Further, the loss of school revenues that results from reduced international-student enroll-
 21 ment will surely prompt budget cuts that further erode the quality or frequency of student jour-
 22 nalism. *See* Kaylee Kang, *et al.*, *Fewer foreign students, fewer dollars: US colleges feel the pinch*,
 23 Reuters (Oct. 3, 2025), <http://bit.ly/47aNGWt> (reporting that “dozens of schools . . . have
 24 announced budget cuts in response to Trump administration policies that are upending higher
 25 education.”). Such cuts would compound the pain that the student press has suffered in recent
 26 years. *See, e.g.*, Natalia Mochernak, *‘Fight to keep these papers alive’: Student journalists react to*
 27 *print budget cuts*, *The Daily Bruin* (May 19, 2025), <http://bit.ly/4oeGvT2> (reporting that in
 28 addition to threatened cuts to UCLA’s student newspapers, the University of Southern Cali-
 fornia, “UC San Diego, Indiana University, the University of Kansas, the University of Ne-
 braska Omaha, Pennsylvania State University and Rider University have all faced funding cuts
 to their student newspapers”); Editorial Board, *Cutting student journalism cuts campus transpar-
 ency*, *The Daily Nebraskan* (Mar. 4, 2025), <http://bit.ly/4pVHKId> (detailing additional cuts
 and characterizing them as threatening to “weaken oversight and deprive campus communities
 of information they deserve”).

1 Similarly, Columbia University’s Barnard College threatened to prevent a student jour-
 2 nalist from graduating if she did not answer questions about WKCR’s radio broadcast of a
 3 March 2025 Pro-Palestine protest. *See* Meghnad Bose, *A Student Journalist Covered a Pro-Pal-*
 4 *estine Protest. Soon, Her Graduation Came Under Threat*, Columbia Journalism Rev. (May 6,
 5 2025), <http://bit.ly/4723cmh>. The school’s director of Student Intervention and Success ac-
 6 cused the journalist—who reported on the protest from the station’s broadcast studio—of
 7 “disorderly conduct, disruptive conduct” and other misconduct. *See id.*

8 Absent Plaintiffs’ requested injunction, a culture of suppression of and punishment for
 9 speech will continue to grow and, ultimately, replace a cherished culture of inquiry and debate
 10 on U.S. campuses—a culture fostered by a vibrant student press—with one of fear and self-
 11 censorship. That would infringe on First Amendment rights and undermine the educational
 12 mission of our schools that Congress and the courts have long recognized. *See Papish v. Bd. of*
 13 *Curators of the Univ. of Mo.*, 410 U.S. 667 (1973) (*per curiam*) (reaffirming that public universi-
 14 ties may not punish students for disfavored ideas).

15 Because the First Amendment and a commitment to promoting its lessons and values
 16 prohibit the demonstrated chilling effect that has swept across student newsrooms and stands
 17 to continue to do so otherwise, the Court should enjoin Defendants from deploying the Revo-
 18 cation Provision and Deportation Provision to attack students for engaging in protected speech.

19 **III. Conclusion**

20 For the foregoing reasons, the Student Press Amici respectfully urge the Court to grant
 21 Plaintiffs’ Motion for Summary Judgment and enjoin the government from continuing its un-
 22 lawful campaign against protected student speech. At stake is nothing less than the ability of
 23 student journalists—citizen and noncitizen alike—to engage freely in the democratic enter-
 24 prise that education is meant to foster. The Constitution demands no less.

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3 Date: October 15, 2025

LAW OFFICE OF MATTHEW S.L. CATE

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Matthew S.L. Cate

*Counsel for Amici Curiae Student Press Law Center,
Associated Collegiate Press, College Media
Association, and Fifty-five Student Media Outlets
and Newsroom Leaders*

Appendix A

Appendix A

Student News Organizations¹

The Student Press Amici include the following student news organizations, all of which are nonprofit, editorially independent news outlets led by students:

The Alestle

at Southern Illinois University, Edwardsville

ASUCLA Communications Board d/b/a *The Daily Bruin*

at the University of California, Los Angeles

The Brown Daily Herald Incorporated, d/b/a *The Brown Daily Herald*

at Brown University

The Buccaneer

at Peninsula College

The Campus

at Allegheny College

The Cavalier Daily, Inc. d/b/a *The Cavalier Daily*

at the University of Virginia

The Citizen

at Laney College

The College Voice

at Connecticut College

College Heights Herald

at Western Kentucky University

The Collegian

at San Joaquin Delta College

The Cornell Daily Sun

Cornell University

The Crimson White

at the University of Alabama

The Daily of the University of Washington

at the University of Washington

¹ School names are provided only to help identify *amici*. No university, college, or other educational institution is a member of the Student Press Amici or otherwise participated in Student Press Amici's brief in support of Plaintiffs.

The Daily Pennsylvanian Inc., d/b/a *The Daily Pennsylvanian*
at the University of Pennsylvania

The Daily Princetonian Publishing Company, d/b/a *The Daily Princetonian*
at Princeton University

The Dartmouth, Inc. d/b/a *The Dartmouth*
at Dartmouth College

The Delphian
at Adelphi University

Maryland Media, Inc. d/b/a *The Diamondback*
at the University of Maryland, College Park

The Dickinsonian
at Dickinson College

FAU University Press
at Florida Atlantic University

The Harvard Crimson, Inc. d/b/a *The Harvard Crimson*
at Harvard University

Illini Media Company, d/b/a *The Daily Illini*
at the University of Illinois Urbana-Champaign

Independent Berkeley Students Publishing Company, Inc., d/b/a *The Daily Californian*
at the University of California, Berkeley

Kaleidoscope
at the University of Alabama at Birmingham

The Heights
at Boston College

The Maneater
at the University of Missouri

The Mass Media
at the University of Massachusetts, Boston

The Michigan Daily
at the University of Michigan

Mount Holyoke News
at Mount Holyoke College

The Northern Light
at the University of Alaska, Anchorage

Northwest Student Media
at Northwest Missouri State University

The Oberlin Review
at Oberlin College

The Orion
at California State University, Chico

The Red & Black Publishing Co. d/b/a *The Red & Black*
at the University of Georgia

The Retrograde
at the University of Texas at Dallas

The Rice Thresher
at Rice University

The Sun Star
at the University of Alaska, Fairbanks

The Trinity Tripod
at Trinity College

The Tufts Daily
at Tufts University

The Vanderbilt Hustler
at Vanderbilt University

The Wesleyan Argus
at Wesleyan University

Washington University Student Media, Inc. d/b/a *Student Life Newspaper*
at Washington University in St. Louis

World Series Way Publishing Company, Inc. d/b/a *The Huntington News*
at Northeastern University

Yale Daily News Publishing Co., Inc., d/b/a *Yale Daily News*
at Yale University

Student Newsroom Leaders²

The Student Press Amici also includes the following student newsroom leaders, each of whom is participating as *amici* solely in their individual capacities:

Sidne K. Gard, Managing Editor, *F Newsmagazine*
at the School of the Art Institute of Chicago

Alissa Gary, Editor-in-Chief, *The Independent Florida Alligator*
at the University of Florida

Ethan Grandin, Editor-in-Chief, *The Review*
at the University of Delaware

Adamari Gomez-Medrano, Editor-in-Chief, ACCENT Student Media
at Austin Community College

Max Guerra, co-Editor-in-Chief, *City on a Hill Press*
at the University of California, Santa Cruz

Callie Harkins, Editor-in-Chief, *The Weekly Ringer*
at the University of Mary Washington

Melanie Jackson, Editor-in-Chief, *The Daily Campus*
at Southern Methodist University

Olivia Mapes, Editor-in-Chief, *The Exponent*
at Purdue University

Makayla Paulsen, Editor-in-Chief, *The Simpsonian*
at Simpson College

Trinity Poon, Editor-in-Chief, *The Bates Student*
at Bates College

Allie Seibel, Editor-in-Chief, *The Rocky Mountain Collegian*
at Colorado State University

² Titles and names of publications and schools are provided only to help identify *amici*.