



SOUTHEASTERN LEGAL FOUNDATION
Rebuilding the American Republic®

April 14, 2021

VIA EMAIL

Mr. William Kiefer
General Counsel
Bethany College
wkiefer@bethanywv.edu

Re: Violations of Bethany College Freedom of Expression Policies

Dear Mr. Kiefer:

We are writing to follow up regarding our attempts to reach you about Bethany College's refusal to recognize a Turning Point USA (TPUSA) chapter on campus. Over one month has passed since we sent our initial letter to you. Since then, we have followed up by letter and email. We have not heard back from you or any other administrator at Bethany College about this matter.

As we have expressed, our client still has several steps to undergo before TPUSA is a recognized chapter at Bethany College. The first step is petitioning for signatures in support of forming a chapter. Because petitioning for signatures does not materially or substantially disrupt campus operations, and because the students must still go through an approval process once they have enough signatures, there is no reason for the College to prevent the students from at least attempting to gather signatures in support of their organization. As such, if we do not receive a response from you by Wednesday, April 21, 2021, the students will presume that they can continue with the process of petitioning for signatures.

We look forward to hearing from your office promptly.

Yours in Freedom,

A handwritten signature in black ink that reads "Kimberly S. Hermann".

Kimberly S. Hermann
General Counsel
Southeastern Legal Foundation