Brief on the Merits

No. 18-1234

IN THE SUPREME COURT OF THE UNITED STATES

VALENTINA MARIA VEGA,

Petitioner

v.

JONATHAN JONES AND REGENTS OF THE UNIVERSITY OF ARIVADA,

Respondents

ON WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE FOURTEENTH CIRCUIT

BRIEF FOR RESPONDENTS

Team 20

Counsel for Respondents

QUESTIONS PRESENTED

1. Is a University's free speech policy constitutional when it specifically prohibits students from materially and substantially infringing on the rights of others to enjoy the educational environment?
2. If not, and this policy is constitutional on its face, is it unconstitutional as applied to Ms. Vega, when she targeted her disruption in close proximity of Mr. Drake's speech in an attempt to monopolize the forum?

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STATEMENT OF JURISDICTION

The United States Court of Appeals for the Fourteenth Circuit entered final judgment on this matter on November 1, 2018. *Jones v. Vega*, No. 18-1757 (14th Cir. Nov. 1, 2018). Petitioner filed a timely petition for a writ of certiorari, which this Court granted. This Court has jurisdiction under 28 U.S.C. §1254(1).

STATEMENT OF THE CASE

I. University's Adoption of State Free Speech Policy

On June 1, 2017, the state of Arivada enacted the "Free Speech in Education Act of 2017" (Act), which requires "all public colleges and universities in Arivada to promulgate a policy to protect free speech on campus within three months…" R. at 2. Accordingly, the University of Arivada (University) promulgated the "University of Arivada Campus Free Speech Policy" (Policy) on August 1, 2017. R. at 23. Among other stipulations, the Policy prohibited expressive conduct on campus that "materially and substantially infringes upon the rights of others to engage in or listen to expressive activity." R. at 23. The Policy calls for a three-strike range of disciplinary sanctions for any University student who violates it: the first strike results in a citation and informal disciplinary hearing. R. at 23. Upon the second strike, the student faces suspension for the rest of the semester, and the third strike calls for expulsion. R. at 23. Both suspension and expulsion happen after a formal disciplinary process finding evidence of guilt. R. at 23.

II. Ms. Vega's First Strike

Ms. Valentina Vega is a sophomore at the University, a Hondaraguan-American, and the President of the University's chapter of "Keep Families Together" (KFT) – a national student organization that advocates for immigrants' right by engaging in peaceful protests and rallies, which they deem "essential [for] promoting awareness for immigration issues." R. at 37. Before the start of the 2017 academic year, Ms. Vega – like all other University students – signed the updated Student Handbook Policy Statement, thereby acknowledging that she had received and read all contents in the Student Handbook, including the Free Speech Policy. R. at 20. Only four days later, Ms. Vega and nine other members of KFT attended an anti-immigration rally hosted

by "Students for Defensible Borders" (SDB) on campus and disrupted the event, shouting down the speaker by chanting and protesting while standing on their chairs. R. at 37. As a result, Campus Security Officer Michael Thomas issued citations to all ten KFT members at the event, resulting in each of them receiving their first strike. R. at 38.

III. Ms. Vega's Second Strike and Subsequent Suspension

Mr. Theodore Hollingsworth Putnam is a junior at the University and president of American Students for America (ASFA). He invited Mr. Samuel Payne Drake from Stop Immigration Now (SIN) to speak at the University on September 5, 2017 about the state of immigration in America today. R. at 28. ASFA decided to host Mr. Drake's speech at the amphitheater in the middle of campus because it is an open and accessible space, optimal for student attendance. R. at 28. To ensure the amphitheater was available for the anticipated audience, Mr. Putnam completed the University's Event and Space Reservation Application. R. at 28. The University granted his request, giving ASFA the "right to exclusive use of the amphitheater" at the requested time. R. at 4.

The Amphitheater is situated in the Quad, where students frequently study, talk, play games, and listen to music. R. at 21. Wooden benches surround the platform of the Amphitheater in a semi-circle, and there is no clear barrier between the Amphitheater's last row of benches and the rest of the Quad. R. at 21. At 1:15 pm on September 5, approximately thirty-five people assembled in the Amphitheater to hear Mr. Drake's speech. R. at 21. A few minutes into the speech, Ms. Vega, dressed in a Statue of Liberty costume (R. at 28), stood on the periphery of the Amphitheater while loudly and obnoxiously chanting slogans in Mr. Drake's direction. R. at 25. According to Mr. Drake, this made it "extremely hard for [him] to speak, think and remain focused." R. at 25. While there were other sources of background noise (such as a nearby flag

football game), Ms. Vega's costume and repeated slogans were what distracted those listening to Mr. Drake's speech, causing many of them to turn around to look at her, unable to focus on Mr. Drake. (R. at 25). Mr. Putnam called campus security, who came to the Amphitheater and issued Ms. Vega a citation for "materially and substantially infringing upon the rights of others to engage in and listen to the expressive activity as ASFA's event." R. at 35. Campus Security Officer Michael Thomas then determined that Ms. Vega was far more distracting than the other random background noise because she was generally facing the Amphitheater. R. at 36. Because this was her second citation, the University required Ms. Vega to attend a disciplinary hearing with the University Dean. R. at 39. On September 12, 2017, the University's Hearing Board found that Ms. Vega violated the University Free Speech Policy, and the Dean suspended her for the rest of the semester. R. at 41. Ms. Vega was alone in her protest of Mr. Drake's speech because her fellow KFT colleagues were more cautious in adhering to the Campus Policy, declining to attend out of fear that they would receive citations and face suspension. R. at 27, R. at 31.

IV. Proceedings Below

Ms. Vega filed suit against the University's President, Jonathan Jones, and the University's Board of Regents on October 1, 2017, in the United States District Court for the District of Arivada, seeking a declaration that the First Amendment of the United States Constitution requires the University to reverse her suspension and remove it from her record. R. at 1. On January 17, 2018, the United States District Court for the District of Arivada granted summary judgment to Ms. Vega, concluding that the Free Speech Policy unconstitutionally infringed on Ms. Vega's First Amendment rights both on its face and as applied. R at 17-18. The

University appealed to the Fourteenth Circuit, which reversed the district court and remanded for entry of summary judgment in favor of the University on November 1, 2018. R. at 53.

SUMMARY OF THE ARGUMENT

This Court should affirm the decision of the United States Court of Appeals for the Fourteenth Circuit and find that University's Campus Free Speech Policy is consistent with the Free Speech Clause of the First Amendment and constitutional as applied to Ms. Vega.

The University complied with the state of Arivada's mandate that all state universities create a policy to respond to the phenomenon of students shouting down speakers. The University created a policy that complied with long understood Supreme Court precedent, gave all students notice of the policy, and enforced the policy in a manner that was consistent with both the goals of the legislature and the language of the policy.

Both the language of the Policy and the way it was applied to Ms. Vega were not directed at the content of her speech, but at the time, place, and manner of her conduct. Her actions materially and substantially disrupted the ability of the audience at the American Students For America event to hear and receive information from Mr. Drake. The Policy was not vague because it applied the *Tinker* standard, and meticulous specificity is not what the First Amendment requires. Rather, the University was following the law and Supreme Court precedent, creating a policy that was flexible and reasonable in order to sufficiently protect open access to ideas on campus.

Neither is the Policy overbroad, as there is no evidence of any improper application of this policy, let alone the substantial number required to qualify as overbroad.

The University's Campus Free Speech Policy and subsequent actions were constitutional as applied to Ms. Vega because they advanced the University's compelling interest in facilitating

the free exchange of ideas and were neutral as to the content of her speech. Ms. Vega could have been agreeing with every word coming from Mr. Drake's mouth, but by interfering with his speech, she violated both the rights of the audience to receive his information and his right to be heard.

Ms. Vega had ample alternative channels through which she could share her ideas: holding events with her student group, writing for the campus newspaper, even simply attending Mr. Drake's speech and engaging with him when he was done speaking. But simple communication of her ideas was not the point of Ms. Vega's conduct that day. Her actions, costume, and chanted slogans were intended to prevent Mr. Drake's speech from being heard, to shut him out of the marketplace of ideas on the University campus. In order to protect open access to information, the University rightly held her in violation of its Policy and took action to protect the first amendment rights of the audience and Mr. Drake by removing the material and substantial disruption – i.e., Ms. Vega.

ARGUMENT

I. THE UNIVERSITY OF ARIVADA'S CAMPUS FREE SPEECH POLICY IS CONSTITUTIONAL AS A REASONABLE TIME, PLACE, OR MANNER RESTRICTION THAT IS NEITHER VAGUE NOR OVERBROAD

The right to hear a speaker is embedded in the right to free speech. As the Court held in Virginia State Bd. of Pharmacy v. Virginia Citizens Consumer Council, Inc., there is "a First Amendment right to 'receive information and ideas,'" and "freedom of speech 'necessarily protects the right to receive.'" Virginia State Bd. of Pharmacy v. Virginia Citizens Consumer Council, Inc., 425 U.S. 748, 756–57 (1976) (quoting Kleindienst v. Mandel, 408 U.S. 753, 762-763 (1972)).

This right is "an inherent corollary of the right[] of free speech . . . explicitly guaranteed by the Constitution" based on both the right of the speaker to have a willing audience and the right of the listener to exercise her "own rights of speech, press, and political freedom." Bd. of Educ., Island Trees Union Free Sch. Dist. No. 26 v. Pico, 457 U.S. 853, 868 (1982).

Free speech for both the speaker and the hearer is vitally important not only for individual rights, but also for the sake of civil society. The Court has recognized that protecting speech also safeguards access to ideas, a critical function for schools, and "such access prepares students for active and effective participation in the pluralistic, often contentious society in which they will soon be adult members." Bd. of Educ., Island Trees Union Free Sch. Dist. No. 26 v. Pico, 457 U.S. 853, 868 (1982).

Alas, some students reach young adulthood unprepared to effectively engage in our "pluralistic, often contentious society." Confronted in the marketplace of ideas with beliefs antithetical to their own, they respond with shouted slogans instead of reasoned and timely debate.

In order to protect speakers and listeners from those who want to shout them down, the state of Arivada passed the Free Speech in Education Act of 2017:

> The Legislature hereby finds and declares that episodes of shouting down invited speakers on college and university campuses are nation-wide phenomena that are becoming increasingly frequent. It is critical to ensure that the free speech rights of all persons lawfully present on college and university campuses in our state are fully protected. . . . All public colleges and universities in Arivada are to promulgate a policy to protect free speech on campus…

R. at 19.

A. The University's Policy qualifies as a reasonable restriction on time, place, or manner of speech.

While the question of whether a university campus is a public forum has been litigated, it is not one at issue in this case. R. at 8. Even if the campus were a public forum, the state may impose reasonable restrictions on the time, place, or manner of protected speech, provided the restrictions "are justified without reference to the content of the regulated speech, that they are narrowly tailored to serve a significant governmental interest, and that they leave open ample alternative channels for communication of the information." *AW*.

The Campus Free Speech Policy made no reference to specific content, and when Ms. Vega was suspended, the university made no reference to the content of her speech. It was not the content of her speech that was objectionable, but rather the time, place, and method of her persistent chants in close proximity to and during Mr. Drake's speech, which prevented the audience from attending to his words.

B. The University's Policy is not vague because it applies the *Tinker* standard.

In compliance with the Act, the University of Arivada developed its Free Speech Policy prohibiting "expressive conduct that materially and substantially infringed upon the rights of others to engage in or listen to expressive activity." R. at 23.

This language is adopted from the landmark case on free speech in a school setting, *Tinker v. Des Moines Independent Community School District*, where the Court held that prohibitions of activities that "materially and substantially interfere with the requirements of

appropriate discipline in the operation of the school" would not violate the First Amendment. *Tinker v. Des Moines Indep. Cmty. School Dist.* 393 U.S. 503, 509 (1969).

The Court in *Grayned v. City of Rockford* held another restriction on free speech in a school setting to be constitutional, finding that a prohibition on "willfully mak[ing] or assist[ing] in the making of any noise or diversion which disturbs or tends to disturb the peace or good order of such school session or class thereof" was not vague. *Grayned v. City of Rockford* 408 U.S. 104, 107-08 (quoting Rockford, IL, Code of Ordinances, c.28 s 19.2(a)). In fact, the Court noted that these words were "marked by 'flexibility and reasonable breadth, rather than meticulous specificity.'" *Id.* at 110 (quoting *Esteban v. Central Missouri State College,* 415 F.2d 1077, 1088 (8th Cir. 1969)).

By prohibiting "[e]xpressive conduct that materially and substantially infringes upon the rights of others to engage in or listen to expressive activity," the University of Arivada was following the law and Supreme Court precedent, creating a policy that was flexible and reasonable in order to sufficiently protect open access to ideas on campus.

What the First Amendment requires of a state university is not "meticulous specificity" in its policies. As the Eighth Circuit commented in *Esteban v. Central Missouri State College*, "Condemned to the use of words, we can never expect mathematical certainty from our language." *Esteban v. Cent. Missouri State College,* 415 F.2d 1077, 1088 (8th Cir. 1969).

It would be unreasonable to expect school administrators to provide for every instance of what would violate their free speech policy, but the University of Arivada gave its students

sufficient guidelines of what expressive conduct would violate their policy. Ms. Vega had notice of these guidelines in the Student Handbook. *see* R. at 44.

C. The University's Policy is not overbroad because there is no evidence of a substantial number of improper applications of the policy.

A law or regulation is impermissibly overbroad if "a substantial number of its applications are unconstitutional" *United States v. Stevens,* 559 U.S. 460, 473 (2010) (quoting *Washington State Grange v. Washington State Republican Party*, 552 U.S. 442, 449, n. 6 (2008)). In order to succeed with an overbreadth claim, one must "demonstrate from the text of [the Policy] and from actual fact that a substantial number of instances exist in which the [Policy] cannot be applied constitutionally." *New York State Club Ass'n, Inc. v. City of New York,* 487 U.S. I, 14 (1988). Sheer speculation about remote possibilities is insufficient to justify the conclusion that the Policy is substantially overbroad. *Gooding v. Wilson,* 405 U.S. 518, 530-31 (1972) (stating that the purpose of the overbreadth doctrine "is to allow the Court to invalidate statutes because their language demonstrates their potential for sweeping improper applications posing a significant likelihood of deterring important First Amendment speech – not because of some insubstantial or imagined potential for occasional and isolated applications that go beyond constitutional bounds.")

Here Ms. Vega's only contention that the University's policy cannot be applied constitutionally in a substantial number of instances is that when it was applied twice to her for disrupting two campus events, causing her to get two strikes, it was unconstitutionally overbroad. Two is a number, but not one substantial enough to stand as a foundation for overbreadth, even if in these instances the policy as applied were unconstitutional. Ms. Vega has offered no evidence

that a "substantial number of its applications are unconstitutional" and instead has only contended that in this situation the policy was unconstitutional.

Both affidavits of Ms. Vega's associates attest that they did not attend the ASFA event to protest because they were afraid of receiving another strike. R. at 26-27. These students understood that their conduct from the first protest resulted in a strike. R. at 31. After that protest, the University allowed the students a meeting with the Dean to discuss their conduct, all in accordance with the Policy, at which point these students made an informed decision not to participate in the protest at the ASFA event. Rather than showing a substantial number of unconstitutional applications of the Policy, these affidavits show that the University's policy is both fair and effective.

A speaker with unpopular views still has the same right to be heard on campus as every other speaker. The Court stated in *Terminiello* "[t]hat the speaker may hold views disliked by the campus community is not a permissible basis for the denial of the students' right to hear him." *A*.

No one prevented Ms. Vega from making her views known by holding events with her student group, writing for the campus newspaper, or otherwise voicing her opinion. It was she who sought to prevent an audience from hearing Mr. Drake's speech. Campus Security Officer Mike Thomas judged Ms. Vega's voice to be more distracting than any of the random background noise that could be heard during the speech. R. at 36. A student attending the event said that Ms. Vega's voice was significantly more distracting than other noises that could be heard. R. at 32. And Mr. Putnam found her chanting to be "extremely distracting." R. at 28. These three corroborating witnesses show that Ms. Vega was acting in such a way that her classmates were unable to hear the speaker. Ms. Vega's actions are precisely what the Campus

Free Speech Policy was mandated to address: the impermissible denial of the other student's right to hear the speaker.

II. THE CAMPUS FREE SPEECH POLICY AS APPLIED TO MS. VEGA IS WITHIN THE UNIVERSITY'S POWER TO REGULATE SPEECH, IS CONTENT-NEUTRAL, AND THEREFORE DOES NOT VIOLATE HER FIRST AMENDMENT RIGHT TO FREE SPEECH

The Campus Free Speech policy is constitutional both on its face and as applied to Ms. Vega. Applying the *Tinker* standard, the Policy here is properly applied to Ms. Vega for her materially and substantially disruptive behavior in protesting Mr. Drake's speech. *Tinker* at 509.

Furthermore, Arivada's mandate for its universities to protect free speech by limiting the heckler's veto justify the Policy as properly applied to Ms. Vega.

A. Schools may regulate student speech that "materially and substantially disrupts" the function of the school.

The Supreme Court has held that public schools may not regulate students' speech where there is no finding and no showing that engaging in the forbidden conduct would "materially and substantially interfere with the requirements of appropriate discipline in the operation of the school." *Tinker* at 509 (citing *Burnside* at 749). While *Tinker* was a secondary school, the Supreme Court has never ruled on the question of whether to extend its holding to the university context. The college environment is one designed to encourage students to discover new concepts and try new things – all within the "marketplace of ideas." *Healy v. James*, 408 U.S. 169, 180 (1972) (quoting *Keyishian v. Bd. of Regents*, 385 U.S. 589, 603 (1967). The state has a strong and legitimate interest in protecting this environment from material and substantial disruptions in order to maintain the marketplace of ideas.

Ms. Vega's chants and costume were intended to disrupt Mr. Drake's speech, which she found "insensitive and offensive." R. at 38. By loudly directing her slogans at the other speaker,

Ms. Vega materially and substantially infringed on the marketplace of ideas; as such, the university was free to apply its Campus Free Speech policy to suspend her.

1. Petitioner's speech materially and substantially disrupted the university's function as a "marketplace of ideas" and can therefore be regulated.

Universities have long served the purpose of facilitating the free exchange of academic ideas to contribute to societal welfare and general innovation. Inherent in this function is the requirement for ideas to be shared and received without the fear of penalty or retribution. The Supreme Court in *Healy v. James* said, "The college classroom with its surrounding environs is peculiarly the 'marketplace of ideas,' and we break no new constitutional ground in reaffirming this Nation's dedication to safeguarding academic freedom." *Healy v. James* at 180 (1972) (quoting *Keyishian v. Bd. of Regents*, 385 U.S. 589, 603 (1967). As the Court in *Healy* recognized, a college or university's role as the marketplace of ideas is directly served by academic freedom to both share and hear ideas, even if a subset of people disagree with them.

Ms. Vega's actions impeded the free exchange of ideas by making it difficult for the audience to hear Mr. Drake's speech in the amphitheater. If the university environment is to serve students as a marketplace of ideas, and Ms. Vega's actions materially and substantially interfered with that marketplace, the *Tinker* standard of school interference is acceptable. As such, the University's disciplinary actions as applied to Ms. Vega here were completely within the bounds of its constitutional authority.

Furthermore, the Court has repeatedly extended the *Tinker* standard in as-applied challenges to school restrictions on free speech. In *Bethel School District v. Fraser*, the Court upheld the suspension of a student who delivered a high school assembly speech employing an "elaborate, graphic, and explicit sexual metaphor." *AQ*. This case demonstrated that "the constitutional rights of students in public school are not automatically coextensive with the rights

of adults in other settings." *VA*. The Court also held that schools do not violate the First Amendment by exercising editorial control over school-sponsored expressive activities as long as the limitation is related to "legitimate pedagogical concerns." *Hazelwood Sch. Dist. v. Kuhlmeier*, 484 U.S. 260, 261 (1988). Going further, the Court extended schools' authority to regulate student speech even to an off-campus setting, holding that a school can regulate students' expressive conduct off-campus if it serves an important and compelling interest (in this case, preventing illicit drug use). *Morse v. Frederick*, 551 U.S. 393, 394 (2007). Taken together, these cases stand for the principle that schools may regulate student speech if doing so serves a compelling interest, particularly one that is pedagogically related.

The University's Campus Free Speech Policy and subsequent actions were constitutional as applied to Ms. Vega because they advanced the University's compelling interest in facilitating the free exchange of ideas. And because the Supreme Court has extended schools' ability to regulate speech at off-campus settings, the events in this case, which happened on campus, would certainly be within the parameters set by precedent for speech regulation. In order to protect its legitimate pedagogical concerns in preserving the free exchange of ideas, the University must be able to regulate student speech through enforcement of its Campus Free Speech Policy as it was applied to Ms. Vega.

2. The Supreme Court has never limited an extension of free speech regulation from the secondary school to the university environment.

While the Supreme Court has repeatedly upheld secondary schools' ability to regulate student speech to serve a compelling interest in promoting a pedagogical environment, the Court has never limited such authority from applying to the university setting as well. In *Healy v. James*, the Court held that when college students filed an application for recognition of a student organization in conformity with the college's requirements, the burden was on the college

administration to justify rejection of the application, and mere disagreement with the group's philosophy or unsubstantiated fear of disruption were insufficient to warrant denial. *Healy v. James*, 408 U.S. 169 (1972). After *Healy*, the Court in *Papish v. Missouri* held a university wrongly expelled a student in violation of the student's constitutional rights because the university disagreed with the content of the student's speech. *Papish v. The Bd. of Curators of the Univ. of Mo.*, 410 U.S. 667 (1973). The Court explained that this did not challenge the *Healy* standard because the reason the expulsion violated the student's rights was that the expulsion was merely on the basis of the university's disagreement with what the student said. *Id*. Affirming the *Healy* standard, the Court held a university may regulate speech for legitimate educational purposes. *Id*. Thus, while the Supreme Court has been more explicit in its reaffirmation of secondary schools' ability to regulate student speech for educational reasons, it has also never limited such powers from the college environment.

The University of Arivada, following this precedent, developed its Policy for the legitimate purpose of safeguarding the open exchange of information in the marketplace of ideas on its college campus.

B. The University must be allowed to regulate Petitioner's speech to prevent a heckler's veto.

Besides the general principle of a school's right to restrict student free speech, the Court has also repeatedly affirmed limitations to speech that prevent the "heckler's veto" – the idea that a person can silence another with whom she disagrees. In *Hill v. Colorado*, the Court upheld a Colorado statute making it illegal for a person within 100 feet of an abortion clinic to knowingly approach within 8 feet of another person without her consent in order to pass out leaflets, protest, and conduct other expressive action. Opponents of abortion argued that the Colorado statute

violated their First Amendment rights as an unconstitutional restriction on free speech; in turn, Colorado maintained that the statute was intended to prevent the heckler's veto and instead "allow every speaker to engage freely in any expressive activity communicating all messages and viewpoints subject only to the narrow place requirement…" *Id.* at 734. The Colorado legislature's intent was to restrict not speech itself, but rather interference with speech. The *Hill* court recognized the importance of being able to restrict speech to preserve speech, noting that "[t]he right to free speech, of course, includes the right to attempt to persuade others to change their views, and may not be curtailed simply because the speaker's message may be offensive to his audience." *Id.* at 716. As one scholar noted, "First Amendment speech rights include the right to try to convince others to adopt one's own views and the right to hear views and opinions that help us form our own opinions, even if the majority seeks to squelch certain viewpoints." Julien M. Armstrong, *Dariano: The Heckler's Veto and a New School Speech Doctrine*, 26 Cornell J. of L. & Pub. Pol'y 389, 393 (2016).

This is what the University sought to limit in order to protect free speech on campus: not the airing of ideas, but the power of a determined saboteur to silence the voice of another by disrupting his speech. Ms. Vega sought to interfere with other listeners' ability to hear Mr. Drake's public speech because she disagrees with its message. Arivada, like Colorado, was not seeking to censor the content of her speech but rather its interference with the rights of others. The University's Campus Free Speech Policy was intended to serve the legitimate purpose of preventing a heckler's veto and facilitating the free exchange of ideas to be spoken as well as heard. As such, the Policy as applied to Ms. Vega is constitutional.

CONCLUSION

For the reasons stated above, the University respectfully requests this Court affirm the decision of the United States Court of Appeals for the Fourteenth District and find that the University's Campus Free Speech Policy is consistent with the Free Speech Clause of the First Amendment.

CERTIFICATE OF COMPLIANCE TO VICE CHANCELLORS

[X] Pursuant to Competition Rule III (b)(C)(3)(i), all work product contained in all copies of the team's brief is in fact the work product of the team members.

[X] Pursuant to Competition Rule III (b)(C)(3)(ii), this team has complied fully with our school's governing honor code.

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Date: January 31, 2019

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Team 20