



# University of Pittsburgh

*Office of University Counsel*

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**VIA EMAIL**

Philip A. Sechler  
Alliance Defending Freedom  
Center for Academic Freedom  
44180 Riverside Parkway  
Lansdowne, VA 20176  
psechler@adflegal.org

**Re: Response to Knowles Event Demand Letter**

Dear Mr. Sechler

I write today in response to your letter dated June 5, 2023 regarding the Michael Knowles event that was held at the University on April 18, 2023. In your letter you request that the University rescind the security fees charged for the event, revise our Event Scheduling Guidelines, and compensate ISI for costs related to the event.

After thoroughly investigating this matter and after careful consideration the University is rescinding the invoice dated April 18, 2023 in the amount of \$18, 734.25. To be clear, this fee was not assessed to ISI based on any expectation of potential reactions to the event. Our staff believed, based on communications with ISI, that ISI was offering to pay not just the costs that would have been assessed to College Republicans, but the costs that the University would incur as well. Clearly, there was a disconnect between our people and ISI. Unfortunately, ISI did not raise the issue when they received an estimate prior to the event, or this would have been easily resolved at that time.

Regarding our Event Scheduling Guidelines, the factors considered in determining security fees is clear and most importantly, content neutral and not based on expected reactions. Therefore, we see no reason to make changes to our guidelines at this time.

Finally, the University disagrees with the assertion that the University incited the crowd or that there was a failure to take reasonable action to protect ISI and College Republicans. In fact, Pitt Police were able to keep protesters at bay and keep attendees safe. When there was concern that the situation was deteriorating Pitt Police were able to get approximately 400 attendees out of the venue safely and without incident. While the event did end early, Mr. Knowles was able to give his entire presentation, it was the Q&A at the end that was impacted, unfortunately. I would note that, Mr. Knowles was approximately 15 minutes late to the venue. Had the event started on

time the Q&A would have been impacted to a lesser extent. While it is unfortunate that the event ended early, Pitt Police worked hard to ensure the safety of attendees and as such the University will not compensate ISI for the costs of the event.

Sincerely,

DocuSigned by:



J. Nicole Rhodes

Associate Legal Counsel