



**SOUTHEASTERN LEGAL FOUNDATION**  
Rebuilding the American Republic®

April 1, 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 you to follow up about the letter we sent on March 12, 2021 regarding Bethany College's refusal to recognize a chapter of Turning Point USA (TPUSA) on campus. We understand that the College forwarded the letter to your office. We are also aware that there is only one month left in the school year. The summer is a valuable time for all student leaders to plan and prepare activities for the fall semester. This is especially true when, like at Bethany College, student activity fees are disbursed at the beginning of the school year. The students who plan to form a TPUSA chapter need to move forward with preparing future activities and funding requests.

As we pointed out in our letter, the College has not even allowed these students to petition for signatures in support of their group. The students still have several steps to undergo before they are an official organization. For these reasons, and the reasons laid out in our previous letter, it is imperative that the College allow them to move forward with gathering signatures.

Time is of the essence. We trust that the College agrees and that the College does not wish to further violate its own policies and procedures. All students should be provided with the opportunity to form student organizations—their viewpoints, and the distorted beliefs about those viewpoints, should not stand in the way.

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

CC: Gerald Stebbins (gstebbins@bethanywv.edu)