

September 9, 2020

Via email umpresident@umsystem.edu

Mun Choi, President
University of Missouri

Via email boardofcurators@umsystem.edu

Board of Curators
University of Missouri

Via email owenssj@umsystem.edu

Stephen J. Owens, General Counsel
University of Missouri

To Whom it May Concern:

I have been retained to represent individuals who have been blocked on Twitter by University of Missouri President Mun Choi via his account, @munychoi4545. President Choi has blocked numerous people, including current University of Missouri students and journalists for speaking critically about issues related to the University's handling of the COVID-19 pandemic.

Not only is it immoral and repugnant for President Choi to block students and other persons on social media who are trying to raise awareness of campus safety issues in the middle of a global pandemic, it is also unlawful.

By using his Twitter account as a tool of his office, President Choi's twitter account has become government-controlled property.¹ There is no official account for the UM System President and so @munychoi4545 is the only public-facing account for President Choi. Furthermore, President Choi's Twitter Bio identifies him as "President of UM System; Chancellor of Mizzou" and his Twitter photo is a photograph of him on the Francis Quadrangle.²

President Choi uses his Twitter account for official announcements, such as his sharing of his official letter regarding the passing of Dr. Gus T. Ridgel.³ He has also used the account to reply to journalists regarding the sharing of COVID-19 data on UM campuses⁴ and to re-tweet then-Lieutenant Governor Mike Parson's official tweet regarding a

¹ See, e.g., *Knight First Amendment Inst. at Columbia Univ. v. Trump*, 928 F.3d 226, 236 (3rd Cir. 2019); *Davison v. Randall*, 912 F.3d 666, 680 (4th Cir. 2019); *Robinson v. Hunt Cty., Texas*, 921 F.3d 440, 447 (5th Cir. 2019).

² <https://twitter.com/Munychoi4545>

³ <https://twitter.com/Munychoi4545/status/1291537849012158466?>

⁴ <https://twitter.com/byEliHoff/status/1296602412166324225?>

⁵ <https://twitter.com/Munychoi4545/status/1296616608471777280?>

performance President Choi and Parsons attended at the UMKC Conservatory of Music and Dance.⁶ There is zero purely personal content on President Choi's twitter account. Every single tweet from the account relates to the University of Missouri.

As President Choi's twitter account is a government forum, blocking people for their criticism of the university's handling of a public health crisis constitutes viewpoint-based discrimination in violation of the First Amendment.⁷

To cure President Choi's infringement upon the First Amendment, I request that President Choi immediately unblock each person he has blocked on Twitter and notify me when that has been done. If I do not hear from either you or your representatives, I will be forced to seek a remedy in United States District Court. I await your reply.

With kindest regards, I am.

Sincerely,

A handwritten signature in black ink, appearing to read 'CWB', with a long horizontal line extending to the right.

Christopher W. Bennett
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Mizzou '05

⁶ <https://twitter.com/mikeparson/status/929215516689891329?s=20>

⁷ See, e.g. *Knight First Amendment Inst. at Columbia Univ. v. Trump*, 928 F.3d at 239-40.