



Office of the General Counsel



Wendy S. White
Senior Vice President and General Counsel

March 18, 2021

Zachary Greenberg
Senior Program Officer, Individual Rights Defense Program
FIRE
510 Walnut Street, Suite 1250
Philadelphia, PA 19106

Dear Mr. Greenberg:

I am writing in response to your letter of March 1, 2021. As I assume you are aware, the University has provided the following response to the ASH-UP group. As the note makes clear, while the group is not able to get approval or funding for in person activities at this time as a result of the pandemic, we encouraged the group to connect virtually to share their mutual interests in archery, hunting, and shooting.

This is the exchange of correspondence:

Hi Chris,

Thank you for your email. I apologize for the delayed reply. As Rodney has indicated before, the review of your group's request to be registered is still being delayed due to the pandemic's impact on the University. That being said, as you have access to a Zoom account through the University, we would encourage you to connect virtually with your peers who share an interest in archery, hunting and shooting - as you appear to have identified a community. Currently student groups are not able to gain approval (or funding) for off-campus activities and we have no planned Activities Fairs or recruitment opportunities until Fall 2021. Thus, a lack of University registration should not serve as a barrier to you engaging virtually with your peers.

I do appreciate that you are frustrated with our inability to register your group at this time and have been tracking other groups who have received registration. Given the range of activities our groups represent, some simply require more significant review than others. Given the risks associated with the type of activity your group hopes to engage in, we must perform our due diligence. Unfortunately, we do not provide conditional group registrations for virtual or in-person activity. Registration, when given, is in full. Until we can do that, we encourage you to build community among those you have already connected with and share your interests.

Best,
Katie

Katie Hanlon Bonner
(she, her, hers)
Executive Director | Office of Student Affairs

University of Pennsylvania | Philadelphia, PA
<https://www.vpul.upenn.edu/osa/>

From: Choe, Dongwook <dongchoe@pennmedicine.upenn.edu>
Sent: Monday, March 8, 2021 10:26 PM
To: Bonner, Katie <hanlonkj@upenn.edu>
Cc: Robinson, Rodney V <rodnevr@upenn.edu>; Martino, Richard <martinor@pennmedicine.upenn.edu>; Wojtak, Krzysztof <wojtak@pennmedicine.upenn.edu>; Michael Fink <mfink@publicsafety.upenn.edu>; presweb@pobox.upenn.edu <presweb@pobox.upenn.edu>
Subject: ASH-UP Virtual Meeting

To Ms. Bonner and the Office of Student Affairs,

On behalf of the Penn students interested in forming a student club known as "Archery, Shooting and Hunting at the University of Pennsylvania" (ASH-UP), we are writing to request a virtual meeting with you to discuss a path forward for our club's official registration. As you may be aware from our correspondence with the Office of Student Affairs, and further correspondence from the Foundation for Individual Rights in Education (FIRE) with the office of President Gutmann, we have been seeking official recognition for our club for over a year.

Given our club's prospective activities, the Office of Student Affairs has highlighted the requirement for the Office of Risk Management and Division of Public Safety to review our club for approval. Furthermore, the Office has stated that these organizations will not be able to review our club until the University returns to non-remote operations. Our club members consist almost entirely of medical professionals and medical researchers, and we are understanding of the priority that must be placed by these offices on ensuring student safety in the context of the global pandemic. Nevertheless, during the period of remote operations, we have seen various other student organizations approved to operate in a remote manner, and we believe that there is no reason that ASH-UP would not be able to reasonably do the same.

This would permit us to participate in virtual campus recruitment activities to build our membership, apply for sponsorships from third party organizations to fund our club, and hold virtual meetings to connect club members with one another, without the club engaging in the physical activities which the University would need to review more closely. ASH-UP continues to be denied these opportunities as we wait patiently for these offices to consider our registration.

We believe our club will be a valuable contribution to the Penn community. Our student body is exceptionally diverse--not just in terms of race, gender and geography, but also in terms of life experiences, culture, and ancestry. Although archery, shooting, and hunting may be less common among students from urban areas such as Philadelphia, students from rural and indigenous communities may see these activities as part of their heritage and way of life. Even without official recognition, our

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club has seen interest from a diverse array of people: from the conservationist who loves hiking Pennsylvania's outdoors to the religious who want to ethically harvest their own halal meat. It is our shared differences that makes the Penn community so remarkable, and we are proud to add to it in our own way.

We are graduate and professional students; we will only be on Penn's campus for so long. Our opportunity to contribute to the Penn community in this manner is closing quickly. As our email correspondence has not yielded progress, we request a live, virtual meeting between you and our club leadership. Representatives from the Office of Risk Management and the Division of Public Safety would be welcome as well. We expect that with a face-to-face meeting, we will find common ground that allows our club to get started but also satisfies the University's concerns.

We would like to schedule this meeting sometime between March 15th and 30th and would appreciate a response to this message no later than March 19th. Thank you for your consideration; we hope you can share some of your time with us to have a productive discussion on this matter.

Best,

The ASH-UP student leadership:
Chris Choe, President
Krzysztof Wojtak, Vice President
R. Alexander Martino, Treasurer

Sincerely,



Wendy S. White