



December 23, 2025

Via Email Attachment and Certified Mail

Ms. Erika Geetter
Senior Vice President and General Counsel
Boston University
125 Bay State Road
Boston, MA 02215
egeetter@bu.edu

Re: Representation of Zachary Segal

Dear Ms. Geetter:

We represent Zachary Segal, a current Boston University undergraduate student, in connection with the University’s failure to meaningfully deter or prevent the harassment and threats directed at him by individuals, including Boston University students, in recent weeks (the “Matter”). Any future Boston University communications regarding the Matter—including, but not limited to, those from administrative officials, faculty, professors, and athletics teams—with Mr. Segal should now be directed to our firm.

As you are aware, on November 7, 2025, Mr. Segal posted on X that he had contacted U.S. Immigration and Customs Enforcement to report what he believed to be violations of federal law.¹ In the days and weeks that followed, individuals, including fellow Boston University students, targeted and harassed Mr. Segal through online and in-person forums, escalating these threats to the point of eliciting multiple credible threats of physical violence.

Posters distributed and displayed on Boston University’s campus described Mr. Segal as a “RACIST AND FASCIST” and accused him and other students of “willingly partak[ing] in the ethnic cleansing of our community.”

These individuals are also subjecting Mr. Segal to sustained cyber harassment. He received multiple text messages stating, *inter alia*: “If I ever see you i’m (sic) fucking killing you and leaving ur (sic) dead body on the sidewalk”; “I’ll be waiting outside your little event tonight”; and “We’re coming for you.” Several messages shockingly

¹ Zac Segal (@endthehiding), X (Nov. 7, 2025, at 3:46 PM ET), <https://perma.cc/ZRD7-Q78W>.

demonstrate that the individuals making threats are aware of Mr. Segal's home address in Boston.²

In response to these threats, the Dean of Students, Jason Campbell-Foster, directed Mr. Segal not to attend classes and put the onus on Mr. Segal to contact his professors to make alternative academic arrangements. Through this resignation, Boston University acknowledged that it could not ensure Mr. Segal's physical safety on campus, thereby confining Mr. Segal to his home, an equally unsafe location.

At the same time, a Boston University spokesperson told *The Daily Free Press* that the University seeks to support "those who are distressed by this situation." The University President publicly commented on Mr. Segal's post, stating: "We must affirm the dignity and worth of all people. Too often, we fail to see one another's full humanity, overlooking the rich complexity and unique gifts each person brings." Notably, no University official has publicly condemned the threats against Mr. Segal, nor has the University announced concrete measures to ensure his safety.

Indeed, the threats that individuals, including Boston University students, have lodged against Mr. Segal include explicit references to violence against individuals expressing conservative viewpoints. One message stated: "Here's to hoping you're the next to get Kirked," a clear reference to the assassination of noted conservative Charlie Kirk. These communications underscore the severity and credibility of the risks Mr. Segal faces.

Boston University's response stands in sharp contrast with actions taken by similarly situated institutions. Earlier this month, when a Turning Point USA chapter leader at Olivet Nazarene University received death threats, the university promptly offered academic accommodations.³ Olivet Nazarene's president publicly condemned the threats—rather than the student—and administrators worked swiftly with law enforcement to identify the anonymous individual responsible.⁴

Under Massachusetts state law, Boston University owes its students a duty of reasonable care. *See Mullins v. Pine Manor Coll.*, 449 N.E.2d 331, 336-37 (Mass. 1983) ("It is an established principle that a duty voluntarily assumed must be performed with due care ... principles of law provide a sufficient basis for the imposition of a duty on colleges to protect their resident students against the criminal acts of third parties."). This duty requires the University to exercise reasonable care to prevent reasonably foreseeable injuries by third parties, whether those acts are accidental, negligent, or intentional. *Id.*; *Helpman v. Northeastern Univ.*, 149 N.E.3d 758, 772 (Mass. 2020).

² Screenshots of these communications have been preserved. They are on file with the author.

³ Joshua Q. Nelson, *Death threats toward TPUSA chapter leader at Illinois college sparks investigation, forces leaders to leave campus*, FOX NEWS (Dec. 10, 2025), <https://perma.cc/5JNH-VW35>.

⁴ *Id.*

In addition, universities enter into enforceable contractual obligations when they make specific and definite commitments in handbooks, policy manuals, and other official materials. *See Guckenberger v. Boston Univ.*, 974 F. Supp. 106, 150 (D. Mass. 1997). Boston University has made numerous such commitments, including:

- “Boston University welcomes students, faculty, staff and guests from many religious, political, social, cultural and other perspectives. ... With this freedom, however, comes the responsibility to respect the rights of others, including *the right not to be harassed*.”⁵
- “We are committed to building a campus culture where all people feel valued, empowered to do their best work, and *free to openly express their points of view without retaliation, harassment, or bias*.”⁶
- “The University is committed to creating and maintaining a community that invites the full participation of all people and the expression of all viewpoints. The University believes that freedom of speech and expression are essential to, and compatible with, the principles articulated in Boston University’s Statement on Diversity. ... *The University may also restrict speech or expression that breaks the law, violates University policies or codes of conduct, or is otherwise directly incompatible with the safety of the community or the functioning of the University*.”⁷
- “Universities have and must continue to serve as spaces that encourage the free exchange of diverse perspectives. However, as online platforms increasingly serve as channels for such discourse, *we note with concern a significant increase in politically motivated harassment of students, faculty, and staff, including members of our department. This includes doxxing campaigns that seek to intimidate individuals expressing political viewpoints by identifying their personal information to online audiences without their consent. We condemn such incidents in the strongest possible terms and offer our full support for members of our community who are suffering distress because of this online harassment*.”⁸

Boston University’s representations create contractual expectations that Mr. Segal may express his support for federal law enforcement without retaliation, harassment,

⁵ *Tolerance & Religion*, BOS. UNIV. OFF. OF THE DEAN OF STUDENTS, <https://perma.cc/6WMP-ADSG> (emphasis added).

⁶ *What We’re Doing*, BOS. UNIV. CMTY., CIVILITY & FREE SPEECH, <https://perma.cc/X3YJ-56DZ> (emphasis added).

⁷ Boston University Statement on Free Speech and Expression, <https://perma.cc/B99E-77XK> (emphasis added).

⁸ E&E Statement on Politically Motivated Harassment, BOS. UNIV. ARTS & SCIS., <https://perma.cc/XMU9-TP3W> (emphasis added).

or bias, and that the University will take reasonable steps to protect his safety and well-being.

At present, Boston University cannot adequately ensure Mr. Segal's safety at the Boston campus—a reality confirmed by the University's own directive that he refrain from attending classes. Boston University must provide a reasonable accommodation for Mr. Segal. Asking him to shelter in his home is not reasonable. Accordingly, we request that Boston University permit Mr. Segal to enroll in classes and complete his coursework at the University's Washington, D.C. campus at a cost that does not exceed his attendance at the Boston campus. This request represents a narrowly tailored and reasonable accommodation to a foreseeable and ongoing threat.

Please confirm in writing no later than December 26, 2025, whether the University will facilitate this accommodation and, if it will, outline the steps necessary for implementation. If the University is unwilling to provide this accommodation, please propose alternative measures sufficient to ensure Mr. Segal's safety and his ability to continue his education without interruption. Absent such a response, our client will consider all available legal options, including engagement with appropriate government authorities.

We look forward to your prompt response.

Sincerely,

/s/ Emily Percival

Senior Counsel

America First Legal Foundation

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