



September 19, 2025

Via email & First-Class Mail

Dr. David Pyle, Superintendent
San Jacinto Unified School District
2045 S. San Jacinto Avenue
San Jacinto, CA 92583

Re: San Jacinto Unified School District First Amendment Violation

Superintendent Pyle:

I am an attorney with the Liberty Justice Center writing on behalf of our client and board member, Corey DeAngelis.

Yesterday, after Mr. DeAngelis criticized the District's handling of an employee's public celebration of political violence, the District's official X account blocked him. Although the account later unblocked him, comments now appear disabled across the District's page. These actions restricted Mr. DeAngelis and the public from exercising their First Amendment rights on a matter of obvious public concern.

We appreciate that your September 16 public statement concerning this employee's conduct acknowledged the District's "duty to honor the First Amendment rights of [y]our employees." But that same duty extends to your critics. The Supreme Court has made clear that government officials violate the First Amendment when they block critics on social media.¹ By blocking Mr. DeAngelis for criticizing the District and its employee, the District committed a textbook case of unlawful viewpoint discrimination.

We acknowledge that Mr. DeAngelis has since been unblocked. However, without a firm commitment to protect his First Amendment rights moving forward, he still has a valid legal claim. To resolve this without litigation, we request that, **by close of business on Tuesday, September 23, 2025**, you commit in writing that the District (1) will not block Mr. DeAngelis or other members of the public from interacting with its official social media pages based on criticism of the District or its employees; and (2) provide training to the District's communications staff on the applicability of the First Amendment to the District's social media accounts.

The Liberty Justice Center has recently litigated this exact issue on Mr. DeAngelis's behalf, resulting in a federal consent decree securing substantially similar relief,

¹ See, e.g., *Lindke v. Freed*, 601 U.S. 187, 195 (2024) (recognizing, among other things, that "public schools" engage in state action when they operate social media pages).

along with an award of attorneys' fees. *See DeAngelis v. Pulaski Cnty. Bd. of Educ.*, No. 6:25-CV-004-CHB-HAI (E.D. Ky. July 2, 2025). While we are prepared to litigate the issue again and seek attorneys' fees here, we would prefer to resolve this amicably.

You or your legal counsel should feel free to contact me at the email address below to discuss.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dean McGee', with a stylized, flowing script.

Dean McGee, Esq.
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Liberty Justice Center
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cc:

Sandra Peñaloza, Chairperson, San Jacinto Unified School District,
spenaloza@sanjacinto.k12.ca.us