
ACLJ
AMERICAN CENTER
for LAW & JUSTICE

February 7, 2023

VIA EMAIL

National Archives Museum
Gary M. Stern
General Counsel
(301) 837-3026
garym.stern@nara.gov

RE: Updated notice of clients represented and litigation hold demand concerning National Archives Museum's illegal treatment of pro-life visitors on January 20, 2023

Dear Mr. Stern:

As a follow up to our letter of yesterday, we are providing an updated notice of representation in regard to events occurring at the National Archives Museum ("Museum") on January 20, 2023, whereby Museum security, staff, personnel, and/or agents engaged in a pattern of targeting and harassment of our clients who hold deeply religious pro-life views and who wore clothing or other attire containing religious, pro-life messages. As explained in more detail below, our clients identified below were instructed to either cover up or remove their pro-life attire while visiting the museum or leave the museum forthright.

All communications to our clients listed below and regarding this matter should be directed to undersigned counsel for the ACLJ.

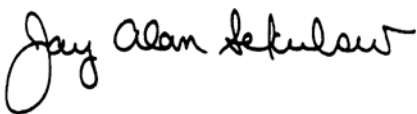
- [REDACTED] and her daughter [REDACTED] entered the building with a group from their Catholic school at approximately 10:00 am on January 20, 2023. Upon entering the Rotunda, [REDACTED] was instructed by Museum security to cover up her t-shirt and button containing pro-life messages. At this same time, many of [REDACTED] fellow classmates who also wore pro-life messages buttons, hats and t-shirts were given the same instruction. Following their departure from the Rotunda, and once inside the gift shop, [REDACTED] again observed Museum employees provide the same instruction to her classmates to remove and/or cover up their pro-life attire.

- [REDACTED] entered the building at approximately 10:20 am on January 20, 2023. Just after making her way through the metal detector, [REDACTED] encountered two Museum security officers, one of whom instructed her to remove her pro-life sweatshirt or leave the building. [REDACTED] complied by removing her sweatshirt.
- [REDACTED] entered the building at approximately 10:45 on January 20, 2023. As she was going through security, [REDACTED] was instructed to either remove her t-shirt containing a pro-life message, or to cover it up. [REDACTED] complied by zipping up her jacket to cover her pro-life message.

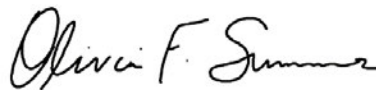
The Museum is hereby put on notice of anticipated litigation concerning the above events. The Museum, its counsel, agents, employees, representatives and staff are under a legal obligation to identify and preserve *all* materials that may be in any way relevant to said incidents. The information that should be preserved includes all hard copy and digitally maintained records and documents including electronically stored information (“ESI”), as defined by the Federal Rules of Civil Procedure. Evidence to be preserved includes but is not limited to writings, drawings, graphs, charts, and other data or data compilations, word processing files, calendaring program data, emails, text messages, photographs, computer logs, training materials, and audio and video recordings (including all security footage) in any and all locations within the Museum’s possession, custody, or control (for example, servers, backup logs/tapes, personal and work computers, and other local storage devices, file servers, databases, cellular telephones, and other handheld electronic devices). To fulfill this duty, the Museum may need to disable or suspend any automatic or routine destruction or deletion procedures for electronic and non-electronic information, including all audio and videotape footage from the day of the incidents, January 20, 2023.

As we continue to be retained by additional clients, we will advise accordingly.

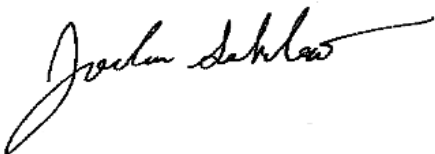
Respectfully,



Jay Alan Sekulow
Chief Counsel



Olivia Summers
Senior Litigation Counsel



Jordan Sekulow
Executive Director



Abigail Southerland*
Senior Litigation Counsel
*Admitted in Tennessee