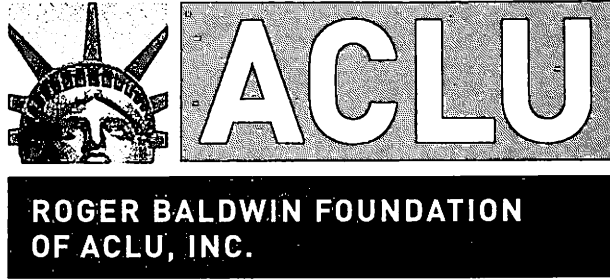


THE
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April 18, 2012

VIA E-MAIL and U.S. MAIL

Thomas P. Walsh
Assistant U.S. Attorney and Chief, Civil Division
United States Department of Justice
219 S. Dearborn Street, Suite 500
Chicago, Illinois 60604

Re: `Albrecht v. Metropolitan Pier and Exposition Authority, No. 03-6472 (N.D. IL)

Dear Mr. Walsh:

I write regarding matters we repeatedly have raised with the Secret Service over the past months, including in my original letter of January 20, 2012, as well as in subsequent meetings on February 17, 2012, March 5, 2012, and April 5, 2012.

Disclosure of the security perimeter

As I informed you this past Monday, it is critical for the effective exercise of First Amendment expressive activities that the Secret Service inform us by the close of business on Monday, April 25, 2012, of the specific details of the security perimeter and plan that it intends to maintain at McCormick Place during the NATO meeting in May. We understand from our conversations that persons not credentialed by NATO or the Secret Service will not be allowed to enter within the security perimeter, including groups and individuals seeking to engage in protected expressive activities, even if they are willing to go through the same security screening as the media.

The requirements of the Albrecht settlement

In our meetings, Secret Service has informed us that the security zone created by the perimeter is likely, though not certain, to include the entrance areas to the facility at which the Metropolitan Pier and Exposition Authority is obligated under the Albrecht settlement to allow leafleting as provided in paragraphs 4,5,11(a)-(d), as well as the "outdoor group expressive areas", where all forms of expressive activity are to be permitted as provided in paragraphs 6, 11(e). We ask that the government provide final confirmation that this is the effect of its security plan or inform us of any facts to the contrary.

Alternative channels of communication

Should the security zone include the areas designated in Albrecht for free speech, and without implying that time, place, manner analysis provides the appropriate governing principle or that the perimeter is narrowly tailored, we request that you identify what locations the federal government is willing to approve for First Amendment activities in compliance with case law requiring the government to insure adequate alternative channels of communication when restricting speech in public forums.

In order to evaluate the adequacy of such proposed locations, we request that you specify where NATO representatives and staff, as well as approved members of the media will enter and exit the facility so that we may determine whether groups and individuals desiring to exercise their First Amendment rights will have an opportunity to offer leaflets to these people and otherwise be able to be within their sight and sound.

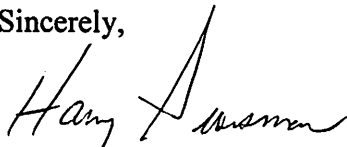
Restraints outside the perimeter

Finally we request that the government specify any limitations on speech or association in areas outside the security perimeter on individuals and small groups as well as any varying or additional limitations on large groups, like the CANG8 group who have a permit to march to McCormick on the afternoon of May 21, and rally on 23rd and Indiana.

It is our unconfirmed understanding that the area of 23rd and Indiana is not acceptable to the Secret Service for the CAN8 rally or ending point for their March, and would not be acceptable for other large groups as well. Please advise where the Secret Service would allow such an assembly.

We have waited for months for the Secret Service to provide the requested information. Any further delay will place at jeopardy the constitutional rights of people intending to engage in protected speech and association at the NATO meeting. If the government chooses not to comply within the time constraints we have set forth, we will seek the assistance of the courts.

Sincerely,



Harvey Grossman

cc: Steve Patton, via e-mail and U.S. Mail
Peggy Davis, via e-mail and U.S. Mail