

# THE NATIONAL LEGAL FOUNDATION

2224 VIRGINIA BEACH BOULEVARD, SUITE 204, VIRGINIA BEACH, VA 23454; (757) 463-6133; FAX: (757) 463-6055

WEBSITE: [www.nlf.net](http://www.nlf.net) ♦ E-MAIL: [nlf@nlf.net](mailto:nlf@nlf.net)

THE MINUTEMAN INSTITUTE ♦ RELIGIOUS SYMBOLS VICTORY PROJECT (R.S.V.P.)

WITH REGIONAL OFFICES THROUGHOUT THE UNITED STATES

November 13, 2006

Chief Gerald Brooks  
City of Greenwood Police Department  
PO Box 40  
Greenwood, SC 29648-0040

VIA U.S. MAIL & FACSIMILE: 864-942-8418

***RE: Notice of Intent to Exercise Constitutional Rights***

Dear Chief Brooks:

The National Legal Foundation has been retained by Columbia Christians for Life ("CCL") in connection with the exercise of constitutional rights on the streets and sidewalks of the City of Greenwood. The National Legal Foundation is a public interest law firm that exists to protect religious civil liberties.

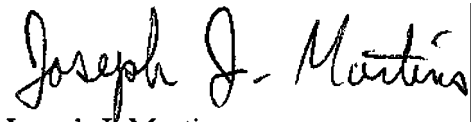
Last year, CCL volunteers were peacefully expressing their views about abortion at the intersection of Montague Street and the U.S. 25 Bypass when an officer from the Greenwood County Sheriff's Department threatened to give them a ticket if they did not put away images of aborted children. Such images are central to the message CCL seeks to communicate to the public about the sanctity of human life. The actions of the Greenwood County Sheriff's Department constituted content-based discrimination against CCL'S message and a clear violation of its members' First Amendment rights.

CCL volunteers will be returning to the Greenwood area again in the near future to exercise their First Amendment freedoms by highlighting the national tragedy of abortion. CCL will again be conveying this message through oral, written, and visual means, including the use of images of aborted unborn children. We wanted to notify you of this ahead of time to avoid any incidents like the one described above.

Please acknowledge receipt of this letter.

We appreciate your prompt attention to this matter.

Sincerely,

A handwritten signature in black ink that reads "Joseph J. Martins". The signature is written in a cursive style with a vertical line to its right.

Joseph J. Martins  
Staff Attorney

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WITH REGIONAL OFFICES THROUGHOUT THE UNITED STATES

November 13, 2006

Sheriff Dan Wideman  
Greenwood County Sheriff's Department  
528 Edgefield Street  
Greenwood, SC 29646

VIA U.S. MAIL & FACSIMILE: 864-942-8589

***RE: Notice of Intent to Exercise Constitutional Rights***

Dear Sheriff Wideman:

The National Legal Foundation has been retained by Columbia Christians for Life ("CCL") in connection with the exercise of constitutional rights on the streets and sidewalks of Greenwood County. The National Legal Foundation is a public interest law firm that exists to protect religious civil liberties.

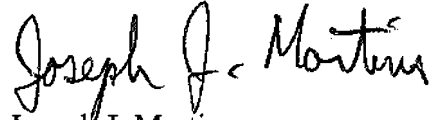
Last year, CCL and its volunteers were peacefully expressing their views about abortion at the intersection of Montague Street and the U.S. 25 Bypass when one of your officers, Major Lonnie Smith, threatened to give them a ticket if they did not put away images of aborted children. Such images are central to the message CCL seeks to communicate to the public about the sanctity of human life. Major Smith's actions constituted content-based discrimination against CCL'S message and a clear violation of its members' First Amendment rights.

CCL volunteers will be returning to the Greenwood area again in the near future to exercise their First Amendment freedoms by highlighting the national tragedy of abortion. CCL has the constitutional right to fully convey their message through oral, written, and visual means, including the use of images of aborted unborn children. You are hereby put on notice that any further interference with CCL's message by you or your officers will leave us no choice but to pursue all available legal remedies without further notice.

Please acknowledge receipt of this letter in writing along with your plans to refrain from interfering with CCL's constitutional rights.

We appreciate your prompt attention to this matter.

Sincerely,

A handwritten signature in black ink that reads "Joseph J. Martins". The signature is written in a cursive style with a large, stylized "J" and "M".

Joseph J. Martins  
Staff Attorney

