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April 25, 2020

Mark Meadows
White House Chief of Staff
1600 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

Kayleigh McEnany
White House Press Secretary
1600 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

RE: Recommendation of Viewpoint Neutral Journalist Seat Assignments for White House Press Briefings and Use of Auxiliary Space Pursuant to Requirements and Procedures Promulgated by the White House Press Office, not the private White House Correspondents Association

Dear Mr. Meadows and Ms. McEnany:

We represent One America News Network (“OAN”). At present, OAN journalists Chanel Rion and Jenn Pellegrino cover White House press briefings at the invitation of the White House Press Office. Nonetheless, they are required by the White House Correspondents Association (“WHCA”) to stand in a corner roped off from other journalists as if they were suspect and unwanted interlopers.

The WHCA is a private, tax-exempt organization under section 501 (c) (3) of the Internal Revenue Code. The WHCA has never been authorized by statute, regulation or order to control access to the White House Briefing Room. On or about April 1, 2020, the WHCA summarily revoked OAN’s already diluted seat in the Briefing Room. The direct and circumstantial evidence is overwhelming, that the WHCA’s revocation was in retaliation for OAN’s positive views about President Trump, including his responses to the COVID-19 pandemic.

The WHCA’s control over seating assignments in the Briefing Room and use of auxiliary space for journalists, i.e., government property, is *ultra vires*, an outlier, anomalous, and dubious under the First Amendment. We urge the White House to end the anomaly immediately

following the model of the Public Information Office (PIO) of the United States Supreme Court in providing oral argument and working space for Supreme Court reporters. Exhibit 1.

Among other things, the PIO is responsible for issuing viewpoint neutral hard pass credentials. The PIO arranges for oral argument seating of the press. The PIO makes viewpoint neutral work-space allocations for credentialed reporters. (At present, there are 26). If the PIO denies an application for a hard pass, a written statement of the basis of the decision is provided. Before suspending or revoking a hard pass, the PIO will provide notice and an opportunity to respond to the holder and provide a written statement of the basis of its decision. In other words, *no private organization of Supreme Court journalists dictate the terms and conditions, especially not access, for reporting on the Court on government property.*

Compare the WHCA with the PIO of the Supreme Court. The former is a private organization accountable only to its members. The latter is a government office accountable to Congress and the American people. The WHCA provides no due process in issuing or revoking hard pass press credentials or Briefing Room seating assignments. (Ms. Rion, for example, was denied WHCA membership without explanation. Ditto for OAN's ejection from the Briefing Room by the WHCA). These acts against OAN are motivated by political and journalistic bias against OAN's conservative viewpoint. Conversely, the PIO expressly prohibits viewpoint discrimination in seating and workplace assignments for hard pass holders.

The constitutional case for the White House Press Office to take control over the Press Briefing Room seating arrangements and auxiliary space for White House journalists and to end the WHCA private monopoly over government property and otherwise in these matters is overwhelming. To fail to do so would continue viewpoint based First Amendment exclusion and hijacking of public property for private gain that would shock most Americans.

The White House is endowed with plenary authority over non-discriminatory public access and use of White House property. *Adderley v. State of Florida*, 385 U.S. 39, 48 (1967) ("The United States Constitution does not forbid a State to control the use of its own property for its own lawful nondiscriminatory purpose."). The White House Press Office's traditional surrender to the WHCA of control and use of the White House Briefing Room and auxiliary journalist work-space is constitutionally dubious under the First Amendment.

The Briefing Room and related working space are so-called "limited public forums" according to decisions of the United States Supreme Court. Such forums consist of public property which the state has voluntarily opened for use as a place for expressive activity. *Perry Educational Association v. Perry Local Educators Association*, 460 U.S. 37, 45 (1983). In limited public forums, viewpoint discrimination is categorically forbidden under the First Amendment. *Rosenberger v. Rector and Visitors of the University of Virginia*, 515 U.S. 819, 829 (1995).

A concatenation of hostile WHCA actions against OAN culminating in the revocation of OAN's Briefing Room's previously diluted seat compels the inference that unconstitutional viewpoint discrimination was afoot:

1. March 16, 2020: A new WHCA Briefing Room seating chart necessitated by COVID-19 social spacing assigns a split seat to OAN with one other network.
2. March 19, 2020: OAN's Chanel Rion asks a question insinuating that her colleagues may be echoing the People's Republic of China's talking points about the origin, spread, and responsibility for COVID-19 pandemic. An anonymous note is left on Ms. Rion's desk in the West Wing suggesting the question was non-journalistic.
3. March 21, 2020: OAN's Jenn Pellegrino asks a question skeptical of a *Washington Post* report.
4. March 21-22, 2020. WHCA changes only one seat assignment in the Briefing Room. OAN's seat is demoted from a split seat to a seat shared by five networks.
5. March 22-23, 2020. WHCA again changes Briefing Room seats for several media outlets. OAN is again downgraded to a seat shared by ten (10) media outlets.
6. In the aftermath of the WHCA seating changes, the White House Press Office invites OAN to attend President Trump's briefings. OAN follows instructions to stand in the back of the room for social distancing.
7. April 1, 2020: The WHCA summarily revokes OAN's diluted seat without notice or an opportunity to respond by either OAN or the White House Press Office. The WHCA fails to provide any written statement of the basis of its revocation decision. The WHCA arbitrary revocation violates OAN's due process rights under *Sherill v. Knight*, 569 F. 2d 124, 129-131 (D.C.Cir. 1977). There, the Court explained: "[Since] White House press facilities have been made publicly available as a source for newsmen, the protection afforded newsgathering under the First Amendment guarantee of freedom of the press, requires that...access not be denied arbitrarily or for less than compelling reasons...This First Amendment interest undoubtedly qualifies as liberty which may not be denied without due process of law under the Fifth Amendment." See also *Karem v. Trump*, 404 F.Supp. 3d 203, 210-215 (/D.D.C. 2019); Tr. Motion Hearing at 6, *Cable News Network, Inc. v. Trump*, No. 18 Civ 2610 (D.D.C. November 16, 2018).
8. During this timeframe, OAN's Ms. Rion and Ms. Pellegrino are assaulted, scorned, and stigmatized by members of the WHCA in and near the Briefing Room. Exhibit 2.

It is common knowledge that OAN's coverage of the Trump presidency, including Ms. Rion and Ms. Pellegrino, sharply diverges from the generally disparaging or venomous coverage provided by WHCA members.

The evidence compels the conclusion that WHCA has discriminated against OAN in the allocation of Briefing Room seat assignments and auxiliary space for desks and live hits on the White House lawn based on viewpoint. There is no plausible viewpoint neutral explanation.

RECOMMENDATION

For the reasons set forth above, OAN recommends that the White House Press Office embrace the model of the Public Information Office of the United States Supreme Court. The White House should assert control over access to White House grounds and no longer abdicate that responsibility to a private organization. It should assert control over the credentialing and hard passes of White House correspondents in accord with viewpoint neutrality and due process. Seat assignments in the Briefing Room or otherwise when space must be rationed should be made by the White House Press Office by using a lottery or a first-come, first-serve principle to safeguard viewpoint neutrality. The same viewpoint neutral selection standards should apply if other White House space, equipment, or access must be rationed.


Viewpoint neutrality under the First Amendment is too important in press coverage of the White House to be left to the private biases of the WHCA.

We would welcome the opportunity to assist in drafting requirements and procedures to implement OAN's recommendation. If nothing changes, the White House itself may be vulnerable to suit for passive participation in constitutional violations.

Very truly yours,



Bruce Fein



Bruce DeValle

Enclosures

EXHIBIT 1

SUPREME COURT PUBLIC INFORMATION OFFICE

**REQUIREMENTS AND PROCEDURES FOR ISSUING
SUPREME COURT PRESS CREDENTIALS**

Requirements And Procedures For Issuing Supreme Court Press Credentials

Introduction

The Supreme Court's Public Information Office (PIO) provides the general public and professional journalists with information about the Court and its work. Among its many responsibilities, the PIO administers the Court's press credentialing process, which includes issuing hard passes (full-time credentials) and day passes. Although a hard pass may not be essential for reporting on the Court, it confers privileges that journalists find helpful, including access to seats in the Courtroom during Court sessions; use of the pressroom facilities and office resources; assigned personal work space; and access to the Court building after normal business hours. In addition, the PIO provides credentialed reporters with information and guidance, beyond what is provided to the public, that facilitates their work. Twenty-six journalists currently hold hard passes. The PIO also issues more than 1000 day passes every Court Term, providing single-day access to the Courtroom and pressroom to individuals seeking to observe a particular Court session.

The PIO's seven-member staff must carefully allocate the limited space and resources available for press usage. The Courtroom has a limited number of seats set aside exclusively for the media, and the press room has 18 carrels for the media's use. To ensure efficient allocation of space and resources, the PIO has traditionally reserved hard passes for full-time professional journalists employed by media organizations that have records of substantial and original news coverage of the Court and a demonstrated need for regular access to the Court's press facilities. The PIO makes no assessment of the content or quality of a journalist's coverage in the credentialing process. But because the Court's fundamental function is adjudication of important issues, the PIO must ensure that press credentialing does not create any appearance of partiality or unfair advantage among litigants or attorneys engaged in the Court's judicial processes. And because a press credential provides access to non-public spaces, the PIO must also be attentive to security concerns.

To better meet those demands and the needs of journalists, to provide greater transparency about the credentialing process, and to address changes in the journalism profession, the PIO adopted new requirements and procedures for issuing Supreme Court hard passes and day passes in February 2015. Commentary is included to explain the rationale for the requirements and procedures and to guide their interpretation. All current holders of hard passes are required to submit applications to renew their credentials for the next term by August 1.

Requirements for Issuing Supreme Court Press Credentials.

Hard Passes. To qualify for a hard pass, an applicant must demonstrate:

The applicant is a full-time journalist;

The applicant operates or is employed by a media organization, and the applicant's primary professional work is for the media organization through which the applicant seeks a hard pass;

The applicant or the applicant's media organization has a record of substantial and original news coverage of the work of the Court;

The applicant will be present at the Court regularly for reporting purposes;

The applicant does not practice law before the Court and is independent of individuals and entities that practice law before the Court; and

The applicant has not been employed by the Court during the two years preceding the application for a hard pass.

Day Passes. To qualify for a day pass, an applicant must demonstrate:

The applicant is a journalist affiliated with a media organization or, as space allows, a writer who is not affiliated with a media organization; and

The applicant has a need to report from the Court on, or to observe, a particular Court session.

Exceptions. Applicants may be relieved of the need to meet the requirements listed above when necessary to address new or unanticipated situations, to prevent undue hardship, or to ensure fairness in the application of these requirements.

Procedures for Issuing Supreme Court Press Credentials.

Hard Passes. Individuals interested in applying for a full-time press credential from the Court should first contact the PIO at (202) 479-3211.

An applicant for a hard pass must submit a written application provided by the PIO that will require the following information:

The applicant's full name, affiliation, and contact information;

A statement that the applicant meets the requirements for issuance of the hard pass; and

Documentation that the applicant meets the requirements for issuance of the hard pass.

By August 1 of every year, a holder of a hard pass must apply to renew his or her credential. The applicant should submit applications to pio@supremecourt.gov.

Holders of hard passes must immediately inform the PIO when any requirement for a press credential is no longer satisfied.

If the PIO denies an application for a hard pass, it will provide a written statement of the basis for its decision. Before suspending or revoking a hard pass, the PIO will notify the holder, allow an opportunity to respond, and provide a written statement of the basis for its decision.

Supreme Court Hard Pass Application

Day Passes. Individuals interested in obtaining a day pass to cover a Court session should contact the PIO at (202) 479-3211. Seating in the Courtroom is limited and is provided on an as-available basis.

Commentary

Requirements for Issuing Supreme Court Press Credentials.

Requirements for Obtaining Full-Time Press Credentials (Hard Passes).

Full-Time Journalist.

For purposes of our requirements, a “full-time journalist” is an individual whose primary occupation is the regular gathering of original news and reporting it to the public. We require the applicant to be a “full-time journalist” because such journalists are more likely to devote sustained attention to the Court’s work and make use of the Court’s media resources. We expect that an applicant will normally be able to satisfy the “full-time journalist” requirement through the affirmation of the applicant’s employer or supervisor. To determine whether this requirement has been satisfied, we may also ask applicants if they hold active press credentials from another government entity, such as the Congressional or White House press galleries.

Operates or Is Employed by a Media Organization.

For purposes of our requirements, a “media organization” is an entity that has as its principal business the regular gathering and reporting of original news for the public, that disseminates its reporting through publicly accessible media, and that has operated continuously for the two years preceding the application for credentials. A media organization can distribute information in any medium (print, television, radio, electronic, or otherwise) and can exist as any form of business or other entity. We require the applicant to operate or to be employed by a media organization because individuals so engaged are more likely to regularly and broadly disseminate information about the Court to the public. We expect that an applicant will normally be able to satisfy this requirement through readily available documentation or a record of publications. To ascertain whether this requirement is satisfied, we may also ask applicants whether they hold active press credentials from another government entity, such as the Congressional or White House press galleries.

To ensure that an individual’s coverage will be disseminated through a qualifying media organization, we require that an applicant’s primary professional work must be for the media organization for which the applicant seeks a credential. We intend to limit hard passes to one journalist per media organization, although rare exceptions may be made upon a demonstrated need. Correspondingly, a hard pass may not be shared or transferred among representatives of a media organization.

Substantial and Original Coverage of the Court.

We require that an applicant or the applicant’s media organization have a record of “substantial and original news coverage of the work of the Court” to ensure that hard passes are allocated to those who have greatest need for the privileges they confer.

Journalists and organizations with records of substantial and original coverage of the Court are more likely to disseminate information about the Court's work to the public. This requirement may be satisfied by documentation of past reporting. For journalists who have not previously covered the Court, the requirement may be satisfied if the applicant's media organization — rather than the applicant — has regularly published substantial and original reporting about the Court.

Regular Presence at the Court for Reporting Purposes.

The Court has increasingly made records, briefs, opinions, and transcripts readily available on its Website, enabling journalists to report on the Court's work from remote locations. Consequently, some journalists may cover the Court effectively without a regular presence in the building. Nevertheless, access to the Courtroom press section and pressroom remains important to other journalists. We accordingly allocate press credentials to those journalists who will actually use them. We expect that applicants will normally satisfy the requirement of a regular presence by showing a past record of frequent attendance at Court sessions.

Independence from Individuals and Legal Organizations that Practice Law before the Court.

Lawyers have increasingly entered the domain of journalism, appearing in the media to comment and report on pending cases and legal developments. Many lawyers do so to bring expertise to the reporting, but they may also do so to cultivate and promote their legal practices and affect public perceptions about how the courts should rule. The mixing of professional roles raises ethical concerns. A court's issuance of a press credential to an attorney who practices before it can create, at the least, an appearance of an unfair advantage over other attorneys through the use of the journalistic privileges that the credential confers. That consideration takes on special significance in the Supreme Court, which adjudicates some of the Nation's most important, sensitive, and newsworthy legal issues.

We accordingly provide that an applicant for a hard pass may not practice law before the Court. Similar ethical issues may arise if lawyers establish employment relationships with journalists, or if lawyers own or control media organizations. We therefore require that an applicant must also be independent of individuals and organizations that practice law before the Supreme Court. Because of the difficulties of assessing or monitoring the effectiveness of a media organization's internal safeguards or "firewalls," we require that an applicant may not be employed or supervised by a lawyer, law firm, or other legal organization that practices before the Court. Similarly, an applicant may not be employed by a media organization owned or controlled by a lawyer, law firm, or legal organization that practices before the Court.

For purposes of our requirements, and to provide a clear rule, we will consider an individual to "practice law before the Court" if the individual has participated as a lawyer in a Supreme Court case during the two years preceding the application for a hard pass. Similarly, a law firm or other legal organization "practice[s] law before the Court" if any

individual at that firm or organization has appeared as a lawyer in a Supreme Court case in the two years preceding the application for a hard pass. Supreme Court Bar membership alone does not trigger these prohibitions.

Not Employed by the Court within Last Two Years.

As an additional ethical safeguard, we require that an applicant must not have been employed by the Court during the two years preceding the application for a hard pass. This requirement ensures that there is no perception that an applicant receives preferential treatment or advantage based on prior employment with the Court. This requirement is consistent with the Court's familiar rule that former Court employees may not practice before the Court during the two years that follow separation from employment. *See Sup. Ct. R. 7.*

Requirements for Obtaining Day Passes.

Journalist or Writer.

Journalists affiliated with a media organization and writers who are not affiliated with a media organization (such as freelance journalists, newsletter writers, or authors) may request day passes. Because of space and resource constraints, the PIO will distribute day passes first to journalists affiliated with media organizations. Applicants may be asked if they hold active press credentials from another government entity, such as the Congressional or White House press galleries, to determine whether this requirement has been satisfied. The PIO will then distribute day passes to other writers not affiliated with media organizations, if space allows.

Demonstrated Need to Report on or to Observe a Court Session.

All applicants for day passes must demonstrate a need to report from the Court on, or to observe, a particular session. Applicants may satisfy this requirement by furnishing a letter from the applicant's editor, bureau chief, or other appropriate person stating that the applicant will report on a particular event taking place at the Court. Applicants may also satisfy this requirement by providing a copy of or website link to the publication or news coverage showing prior writing on the case, event, or issue.

Seating in the press section of the Courtroom is limited and is distributed on an as-available basis. Cases of extremely high press interest require advance reservations and assigned seating in the press section of the Courtroom. The requirement to obtain reservations in advance will be noted on the Court's website about two weeks before the Court session. Seats will be distributed first to holders of hard passes, and then to day pass applicants, all on a first-come, first-served basis.

Exceptions.

Because the needs and circumstances of applicants may vary, we may make exceptions, at our own initiative or in response to requests, to address new or unanticipated situations, prevent undue hardship, and ensure fairness in the application of these requirements. An applicant requesting an exception must provide a written explanation of the need for a departure from the current requirements.

Procedures for Issuing Press Credentials.

These requirements and procedures and the form application will be maintained on the Court's website, on the Press Credentials page (<http://www.supremecourt.gov/publicinfo/press/presscredentials.aspx>). The page will also list current holders of hard passes.

We require that applicants for hard passes contact the PIO by phone at (202) 479-3211 before submitting their applications. Individuals occasionally seek a hard pass even though day passes would meet the individuals' needs to cover sessions at the Court. A discussion between applicants and PIO staff about the Court's media resources and the applicants' interests in covering the Court's work may result in some applicants seeking only day passes, reducing unnecessary burdens on both applicants and the PIO. Individuals should also contact the PIO by phone in order to obtain day passes. Applicants bear the burden of showing that they satisfy all requirements for obtaining a hard pass or day pass.

Please direct all suggestions relating to these procedures to:
http://www.supremecourt.gov/contact/contact_pio.aspx.

EXHIBIT 2

**LETTER TO SECRET SERVICE: ASSAULT, HARASSMENT OF OAN
JOURNALISTS**

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April 24, 2020

Via U.S. Mail, Hand and Email Delivery

U.S. Secret Service
The White House
1600 Pennsylvania Avenue NW
Washington, DC 20500

Re: Assault, Harassment, and Intimidation in the White House Press Briefing Room

Dear Sirs:

We are counsel for One America News Network (“OAN”). This letter informs you of various acts of harassment, intimidation, bullying, verbal and physical intimidation and assault committed on White House grounds against my client’s primary White House correspondent, Chanel Rion, along with acts of intimidation and harassment of OAN’s weekend correspondent, Jenn Pellegrino.

OAN and its correspondents, Ms. Rion and Ms. Pellegrino, have been invited by the White House Press Office to each White House Press Briefing since late March 2020. Recently, the White House Correspondents’ Association (“WHCA”) have confined them to a roped off corner on the outer edge of the Briefing Room. OAN’s journalists must stand through the entire briefing without a chair. WHCA’s motivation for the disrespectful treatment is OAN’s non-alignment with their political opinions or dogmas which tend to be politically polarized and often aggressively antagonistic to the Trump Administration. OAN’s mere presence, perceived as pro-Trump and certainly politically conservative in viewpoint, apparently angers the WHCA. Although they are also invitees and guests of the White House, the WHCA claims a private monopoly on control and access to the Briefing Room and the West Wing basement press area, thereby fostering an atmosphere of harassment and intimidation of OAN’s correspondents.

On April 1, 2020, Doug Mills, a photographer for the New York Times and the Treasurer of the WHCA, berated Ms. Rion after she asked a question to the President. Mr. Mills became very agitated during the press conference and advised her that she was not allowed to ask questions. With profanity, he accused her of making up the rules and demanded that she “follow the WHCA rules”, despite both having equal standing in the White House. Ms. Rion ignored Mr. Mills, who continued to menace and attempt to intimidate her during the April 1, 2020, briefing. After the briefing, Mr. Mills confronted Ms. Rion, approaching her while pointing his finger at her and

berating her while moving toward her in an aggressive and menacing manner. Ms. Rion advised Mr. Mills to back away from her and Mr. Mills continued to bully her and advance upon her causing Ms. Rion to retreat in an attempt to avoid Mr. Mills intrusion into her private space three (3) times before Ms. Rion escaped and left the White House grounds.

On April 20, 2020, Ms. Rion was verbally attacked and physically intimidated, harassed and assaulted in the White House by Yamiche Léone Alcindor. Ms. Alcindor is an American journalist and member of the WHCA. Ms. Alcindor put Ms. Rion in reasonable fear that she would be physically harmed by Ms. Alcindor's aggressive actions. Specifically, Ms. Alcindor acted against Ms. Rion in an aggressive manner on three (3) separate occasions that day. The first interaction involved Ms. Alcindor menacing Ms. Rion while she asked a question. Following the press conference, Ms. Alcindor then chased Ms. Rion down the corridor leading to the West Wing basement press desk area whereby Ms. Alcindor stormed toward Ms. Rion, "got in her face", yelling at her to "get back", causing Ms. Rion to retreat while Ms. Alcindor continued to menace her by moving forward and shouting "get back!" Ms. Rion continued to retreat and stated that she wanted to get away from Ms. Alcindor. Finally, Ms. Alcindor pursued Ms. Rion into the West Wing basement wherein Ms. Alcindor repeatedly moved toward Ms. Rion, causing Ms. Rion to be in further fear and apprehension. Ms. Rion repeatedly told Ms. Alcindor to step back, which requests Ms. Alcindor ignored.

Ms. Rion was reasonably in fear of being imminently physically and offensively touched by Ms. Alcindor during these interactions in the White House corridor and the West Wing basement. Ms. Rion did not welcome Ms. Alcindor's assaults and does not condone them. Ms. Alcindor clearly communicated that neither OAN nor Ms. Rion belonged in the White House Press areas. Ms. Pellegrino has similarly been told by a WHCA Board Member that she did not belong in the White House Briefing Room.

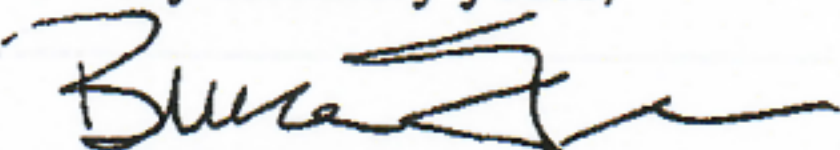
Journalists and cameramen often aggressively and purposefully jostle Ms. Rion and Ms. Pellegrino in the back of the room and show little regard for social distancing or their personal space. These events have occurred regularly and cannot be considered accidental. Irrespective of political viewpoint, Ms. Rion and Ms. Pellegrino must be treated decently and not harassed, intimidated, and assaulted because of their employer or their political viewpoint. Both are journalists, not guests, in the Briefing Room like WHCA members and should not be subjected to physical intimidation and harassment, regardless. WHCA and other journalists have no right or authority to physically intimidate or assault anyone – especially fellow journalists on White House property.

The WHCA assumes ownership and control of the White House Press Briefing Room and the White House Press Tent lawn area. WHCA is hostile towards OAN because it refuses to echo the prevalent anti-Trump Administration opinions or beliefs of WHCA Members and instead exercises independent journalistic judgment. These sentiments are shared by the White House Correspondents Association Board of Directors and some of its more aggressive members and has resulted in promotion of a pervasive atmosphere of intimidation, harassment, and physical aggression against OAN's correspondents that is an outrage that must not be condoned or perpetuated.

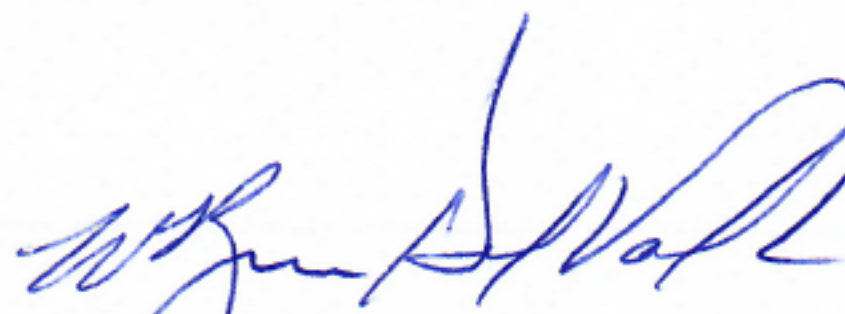
This letter constitutes formal notice to you of the above-referenced acts of assault, harassment, and physical intimidation. We respectfully request that you open an investigation into these acts before they escalate further.

Thank you in advance for your consideration of these matters.

Very sincerely yours,



Bruce Fein



W. Bruce DeValle

cc: Chanel Rion
Charles Herring
Robert Herring

Kayleigh McEnany
Press Secretary
The White House
1600 Pennsylvania Avenue NW
Washington, DC 20500

The White House Correspondents Association
600 New Hampshire Ave. NW
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