

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____)	
REVEREND PATRICK J. MAHONEY,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 21-2314 (JEB)
)	
UNITED STATES CAPITOL)	
POLICE BOARD, <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

**MEMORANDUM OF LAW IN OPPOSITION TO PLAINTIFF’S APPLICATION
FOR A TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

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Dated: September 8, 2021

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Defendants United States Capitol Police Board, and others, respectfully submit this Memorandum of Law in Opposition to Plaintiff's Application for a Temporary Restraining Order and Preliminary Injunction, filed August 31, 2021. ECF No. 4.

Plaintiff's motion for temporary injunctive relief should be denied. He claims that his constitutional rights were violated because Members of Congress requested or held events with 20 or more people in restricted areas of the Capitol Grounds, while his similar requests were not approved. But the permitting regulations that apply to Plaintiff do not apply to Members of Congress, as the D.C. Circuit has recognized. Members of Congress and their staffs do not need a permit to hold their events near the Capitol building and may request that permit applications be approved. Plaintiff, who is not part of the congressional community, must comply with the regulations like all other citizens and groups. Defendants stand ready to work with Plaintiff to find an alternative location on the Capitol Grounds that will satisfy his needs for a prayer vigil on September 11, 2021.

Further, Plaintiff is not entitled to relief because he has failed to present any evidence indicating that he would suffer imminent irreparable harm if a mandatory injunction is not granted. Plaintiff has failed to explain why he cannot conduct his prayer vigil in another area of the Capitol complex that is open to permitted demonstrations of groups of at least 20 people.

BACKGROUND

This case arises in the wake of the events at the Capitol on January 6, 2021. On that date, insurrectionists stormed the Capitol while Congress convened to formally count the electoral votes in the 2020 presidential election. Insurrectionist groups broke through doors and windows to enter the building. Members of the U.S. House of Representatives and the U.S. Senate stopped the counting of the electoral votes and sought refuge. Members of the United States

Capitol Police (“USCP”) were assaulted and killed. The Capitol building was vandalized and desecrated, and government property was stolen and damaged.

On January 8, 2021, the Capitol Police Board restricted public access to certain areas within the Capitol Grounds to limit exposure and protect against threats to the damaged Capitol building and the Congressional community. While the exterior and interior fencing now has been removed, demonstrations in the areas closest to the Capitol—identified as Areas 1, 8, 9, 10, and 11 on the Demonstration Map—temporarily remain limited to groups of fewer than 20 people. Grossi Decl.¹ ¶ 14 & Exhibits 1, 2. Groups of 20 people or more may demonstrate in open areas other than Areas 1, 8, 9, 10, and 11. *Id.*

The Capitol Police Board has designated to the USCP Special Events Section the responsibility to receive and process applications for individuals or groups to use the Capitol Grounds for demonstrations or other organized activities. Grossi Decl. ¶ 2. Since July 11, 2021, when the interior perimeter fencing was authorized to be removed, the USCP Special Events Section has received about 13 permit applications from individuals and groups requesting access to Area 1. *Id.* ¶ 17. Except for proposed events that have been requested or advocated by Members of Congress, USCP has been unable to process these applications because Area 1 is closed for events of 20 people or more. *Id.*

On or about July 9, 2021, Plaintiff submitted a permit application to the USCP Special Events Section. Pl.’s Decl.² Exhibit H; Grossi Decl. ¶ 21. His application requested to conduct a demonstration at the Lower Western Terrace of the U.S. Capitol (located in Area 1) related to the

¹ Citations to “Grossi Decl.” refer to the Declaration of Scott Grossi, dated September 8, 2021, and submitted herewith.

² Citations to “Pl.’s Decl.” refer to the Declaration of Patrick J. Mahoney in Support of Application for Temporary Restraining Order and Preliminary Injunction, dated August 30, 2021. ECF No. 4-2.

20th anniversary of the terrorist attacks in New York and Washington on September 11, 2001.³

Id. Access to Area 1, as well as the other portions of Capitol Square, an area bounded by First

Streets, NE and SE, Constitution Avenue, NW and NE, First Street, NW and SW and

Independence Avenue, SW and SE, has been temporarily restricted given its proximity to the

Capitol building and the existing damage to the building's entry points. Grossi Decl. ¶ 25.

Areas 1, 8, 9, 10, and 11 are within Capitol Square. Grossi Decl. Exhibit 2. USCP told Plaintiff

that Area 1 was temporarily closed for demonstrations, but that it would assist Plaintiff with

finding an authorized area for his vigil. *Id.* ¶¶ 26-27. Plaintiff subsequently advised USCP that

he was seeking a permit for the adjacent Western Front Lawn, which also is in Area 1.

On August 24, 2021, Plaintiff submitted a revised application to hold a prayer vigil on September 11, 2021, requesting Area 10 on the East Front. Pl.'s Decl. Exhibit K; Grossi Decl. ¶ 28. However, since that area is also temporarily closed, on August 26, 2021, the USCP Special Events Section informed Plaintiff that "the areas on the East Front of Capitol Grounds, to include Area 10, are currently closed. We would be happy to continue to work with you on the application for September 11, 2021, in one of the available locations on Capitol Grounds." Grossi Decl. ¶ 28.

On August 31, 2021, Plaintiff filed this civil action, alleging that Defendants violated his rights under the First, Fifth, and Fourteenth Amendments to the U.S. Constitution and the Religious Freedom Restoration Act, 42 U.S.C. §§ 2000bb *et seq.* ECF No. 1. At the same time, he applied for a temporary restraining order directing Defendants to "issue a permit to Rev.

³ The Lower Western Terrace is where Plaintiff sought to hold a prayer vigil on April 2, 2021, and he commenced a civil action to request a temporary restraining order to direct Defendants to issue a permit for a demonstration in that location. *See Mahoney v. Pelosi*, Civ. A. No. 21-0859 (JEB).

Mahone so that his proposed prayer vigil on the Western Front Lawn may go forward on September 11, 2021” and seeking to enjoin Defendants from enforcing or otherwise requiring compliance with “any unreasonable prohibition on Plaintiff’s engagement in First Amendment protected activities at said prayer vigil.” ECF No. 4-4 (proposed order).

APPLICABLE LEGAL STANDARD

A temporary restraining order is an extraordinary form of relief committed to the Court’s discretion. *See* Fed. R. Civ. P. 65. An application for a TRO is analyzed using factors applicable to preliminary injunctive relief. *See, e.g., Gordon v. Holder*, 632 F.3d 722, 723-24 (D.C. Cir. 2011) (applying preliminary injunction standard to district court decision denying motion for TRO and preliminary injunction); *Sibley v. Obama*, 810 F. Supp. 2d 309, 310 (D.D.C. 2011) (articulating TRO elements based on preliminary injunction case law). Preliminary injunctive relief is “an extraordinary remedy that may only be awarded upon a clear showing that the plaintiff is entitled to such relief.” *Sherley v. Sebelius*, 644 F.3d 388, 392 (D.C. Cir. 2011) (quoting *Winter v. Nat. Res. Def. Council, Inc.*, 555 U.S. 7, 22 (2008)); *see also Mazurek v. Armstrong*, 520 U.S. 968, 972 (1997) (“[A] preliminary injunction is an extraordinary and drastic remedy, one that should not be granted unless the movant, by a clear showing, carries the burden of persuasion.” (internal quotation marks omitted)).

A plaintiff seeking preliminary injunctive relief “must establish [1] that he is likely to succeed on the merits, [2] that he is likely to suffer irreparable harm in the absence of preliminary relief, [3] that the balance of equities tips in his favor, and [4] that an injunction is in the public interest.” *Aamer v. Obama*, 742 F.3d 1023, 1038 (D.C. Cir. 2014) (quoting *Davis v. Pension Benefit Guar. Corp.*, 571 F.3d 1288, 1292 (D.C. Cir. 2009)) (internal quotation marks omitted). “The four factors have typically been evaluated on a ‘sliding scale.’” *Davis*, 571 F.3d

at 1291. Under this sliding-scale framework, “[i]f the movant makes an unusually strong showing on one of the factors, then it does not necessarily have to make as strong a showing on another factor.” *Id.* at 1291-92.⁴

ARGUMENT

Plaintiff’s request for immediate mandatory injunctive relief fails to satisfy the standards for a temporary restraining order for three principal reasons. *First*, Plaintiff incorrectly argues that he is subject to a content-based restriction because Members of Congress requested or held demonstrations in Area 1 while his application was not approved. *Second*, Plaintiff minimizes the USCP’s legitimate and compelling interest in enforcing security measures that were implemented after January 6, 2021. *Third*, Plaintiff has failed to present evidence of any harm that would occur if he were obligated to conduct the vigil on the Capitol Grounds but outside the restricted zone.

I. PLAINTIFF IS UNLIKELY TO SUCCEED ON THE MERITS OF HIS CLAIMS.

Plaintiff’s request for emergency injunctive relief is based on his flawed arguments that Defendants have violated his (1) First Amendment right to freedom of speech, association and assembly, Mot. at 11-19; (2) right to religious exercise under the First Amendment and the Religious Freedom Restoration Act (“RFRA”), *id.* at 19-22; and (3) Fifth Amendment right to equal protection under the law, *id.* at 22-23. For the following reasons, Plaintiff is unlikely to succeed on any of these claims.

⁴ It is unclear whether the D.C. Circuit’s sliding-scale approach to assessing the four preliminary injunction factors survives the Supreme Court’s decision in *Winter*. See *Save Jobs USA v. Dep’t of Homeland Sec.*, 105 F. Supp. 3d 108, 112 (D.D.C. 2015). Several judges on the D.C. Circuit have “read *Winter* at least to suggest if not to hold ‘that a likelihood of success is an independent, free-standing requirement for a preliminary injunction.’” *Sherley*, 644 F.3d at 393 (quoting *Davis*, 571 F.3d at 1296 (Kavanaugh, J., concurring)). However, the D.C. Circuit has yet to hold definitively that *Winter* has displaced the sliding-scale analysis. See *id.*

A. The Denial of Plaintiff’s Application Reflects a Content-Neutral, Narrowly Tailored Restriction That Allows for Alternative Channels of Expression.

Plaintiff asserts an unconditional right to access restricted areas within the Capitol Grounds under the First Amendment. “The First Amendment [, however,] does not guarantee the right to communicate one’s views at all times and places or in any manner that may be desired.” *Heffron v. Int’l Soc’y for Krishna Consciousness, Inc.*, 452 U.S. 640, 647 (1981). Even when a public forum is involved, the government may impose reasonable time, place, or manner restrictions on expressive activities protected by the First Amendment. *Ward v. Rock Against Racism*, 491 U.S. 781, 8791 (1989).

In this case, USCP’s Special Events Section could not process Plaintiff’s applications due to the *location* where he wanted to hold the prayer vigil, not because of the content of Plaintiff’s speech. Indeed, since mid-July 2021, the Special Events Section has been unable to process a dozen or more applications for the same reason, regardless of their desired content. On this point, Plaintiff’s allegation that Defendants’ restriction was content-based because other events requested by Members of Congress took place on the Western Front Lawn, Mot.⁵ at 13, 16, is misplaced.

Plaintiff argues that the USCP’s inability to process the application reflects content-based discrimination merely because other groups and individuals were allowed to hold events in Area 1 in July and August 2021. But the other events were not subject to the USCP permitting regulations because the events were sponsored or requested by Members of Congress. *See Kroll v. U.S. Capitol Police*, 847 F.2d 899, 902-03 (D.C. Cir. 1988) (noting that the Capitol Police Board’s permit system “by its nature applies to those outside the Capitol Hill community of

⁵ Citations to “Mot.” refer to the Amended Application for Temporary Restraining Order and Preliminary Injunction, filed August 31, 2021. ECF No. 4.

Members of Congress (and their staffs).”). Members of Congress enjoy this privilege due to the unique nature of our elected officials’ constitutional duties. Grossi Decl. ¶ 20. Members of Congress and their staffs are exempt from the statute prohibiting disorderly or disruptive conduct on the Capitol Grounds, demonstrating within Capitol Buildings, or obstructing passage on the Grounds. *Id.* ¶ 21; 40 U.S.C. § 5104(e)(2)(D), (F), (G), (e)(3).

On July 27, 2021, two events were held in Area 1, and both were requested or held by Members of Congress. Grossi Decl. ¶¶ 18-19. One event was held in Area 1 on the morning of July 27, 2021. *Id.* ¶ 18. The other event, initially requested by a different Member, sought to have an event on the East Front of the Capitol within Capitol Square on July 22, 2021, and was held in Area 1 on the afternoon of July 27, 2021. *Id.* ¶ 19. Although this event was sponsored by the American Conservative Union, both the original requesting Member, an additional Senator, and their staff strongly advocated that a permit be granted for this event. *Id.* Because of the significant involvement of Members of Congress in requesting and participating in these events, the permitting rules in the USCP’s regulations did not apply.

The same is true with the unpermitted demonstration on the East Front stairs in early August. *Id.* ¶ 22. Notably, when Representative Bush and other Members of Congress ceased their participation, the remaining demonstrators were advised that they were in violation of the regulations and that the demonstration no longer was authorized. *Id.* ¶ 23.

Plaintiff’s prayer vigil proposed for September 11, 2021, was neither requested nor sponsored by a Member of Congress. The application was therefore subject to the applicable regulations, and the USCP Special Events Section could not process the application because it contemplated for a group of 20 people or more in Area 1.

Accordingly, the USCP Special Events Section did not process Plaintiff's applications solely because of the proposed *location*, not because of the speech he seeks to express. The Capitol Police Board's restrictions are not based on Plaintiff's ideas, as evidenced by the facts that he routinely secured permission in the past for his prayer vigils and that that he has been informed that he can conduct the vigil this year at another place on the Capitol Grounds outside the temporary security perimeter. Plaintiff concedes that he has previously held events on the Western Front Lawn. Pl.'s Decl. ¶ 4. The Court should reject Plaintiff's arguments that he was subjected to a content-based restriction.

A content-neutral restriction is valid if it is "narrowly tailored to serve a significant government interest, and . . . leave[s] open ample alternative channels for communication of the information." *Clark v. Cmty. for Creative Non-Violence*, 468 U.S. 288, 293 (1984); *see Catharsis on the Mall, LLC v. Jewell*, 217 F. Supp. 3d 154, 160 (D.D.C. 2016); *see also Mahoney v. U.S. Marshals Serv.*, 454 F. Supp. 2d 21, 32 (D.D.C. 2006). In this case, the Special Events Section advised Plaintiff that his preferred location was in an area where public access has temporarily been restricted. The restrictions stem from the concerns about security since January 6, 2021, based on ongoing assessments of intelligence and information received from partner law enforcement agencies. Grossi Decl. ¶¶ 6-7. These concerns about security and the integrity of the Capitol constitute at least a significant government interest, and Plaintiff does not argue otherwise in his request for a temporary restraining order.

Rather, Plaintiff argues that the Capitol Police Board's restrictions on public access are not narrowly tailored to any governmental interest. Mot. at 17. But this argument is based on the erroneous premise that permission to hold the vigil in Area 1 is a guaranteed First Amendment right and that his inability to use this temporarily restricted area was based on the

content of his expression. As noted above, there is no basis for that contention, and Plaintiff has presented no evidence to support it. The Capitol Police Board's restrictions are based on the location of the proposed event and do not discriminate against any particular group.

The Capitol Police Board's temporary restrictions on public access to areas near the Capitol are narrowly tailored to the interest in security. The restricted areas are those that are closest to the Capitol or that otherwise could present a viable security risk to the building and its occupants. Importantly, the USCP has removed restrictions to certain areas as threat conditions change. On March 28, 2021, for example, the USCP Board issued an order that reopened five areas of the Capitol Grounds that had been closed to the public. Grossi Decl. ¶ 12 & Exhibit 3. As of July 11, 2021, the Capitol Police Board authorized the removal of the inner perimeter fencing. *Id.* ¶ 13 & Exhibit 4. The Board has tailored the boundaries of the restricted areas based on the corresponding threats to security and the available law enforcement to secure the Capitol Grounds.

Plaintiff has not explained why he is unable to hold the prayer vigil at a location that is available for demonstrations by groups of at least 20 people. He declares that he "feel[s] called" to hold the vigil "within view of where the events of January 6, 2021 took place." Pl.'s Decl. ¶ 8. But there are multiple unrestricted areas of the Capitol Grounds—outside of Areas 1, 8, 9, 10, and 11—that are "within view" of the site of the January 6 events. For example, Areas 3, 12, 15, and 21 are among the locations available for groups of more than 19 people that have a view of the Capitol building. The USCP Special Events Section has offered to work with Plaintiff to find a viable alternative that would satisfy his needs. Plaintiff has failed to explain why he cannot hold his vigil in one of these areas.

Plaintiff has not established that the Capitol Police Board's security-based restrictions on the locations where he can hold his prayer vigil constitute an unconstitutional restriction of his First Amendment rights. He is therefore not likely to succeed on the merits of his claims alleging a violation of his First Amendment right to freedom of speech.

B. Plaintiff Is Not Likely to Succeed on the Merits of His Free Exercise Clause and RFRA Claims.

Plaintiff is not likely to succeed on the merits of his claims under the Free Exercise Clause and the RFRA.

The First Amendment's Free Exercise Clause is implicated only "when a law or regulation imposes a substantial, as opposed to inconsequential, burden on the litigant's religious practice." *Levitan v. Ashcroft*, 281 F.3d 1313, 1320 (D.C. Cir. 2002). Plaintiff's declaration does not include any facts that establish that USCP's reasonable limitations on the areas for the public to demonstrate impose any burden at all on his exercise of religion. Plaintiff has not explained why the exercise of his religion is dependent on holding the prayer vigil in Area 1, as opposed to another nearby area on the Capitol Grounds with a view of the Capitol. Indeed, Plaintiff's declaration fails to address this issue at all. The Court should conclude that Plaintiff has not stated an actionable Free Exercise Clause claim.

For the same reason, Plaintiff has failed to provide any evidence to satisfy an essential element of an RFRA claim. Under the statute, the "Government shall not substantially burden a person's exercise of religion even if the burden results from a general rule of applicability," unless the government can demonstrate that "the burden to the person (1) is in furtherance of a compelling governmental interest; and (2) is the least restrictive means of furthering that compelling governmental interest." 42 U.S.C. § 2000bb-1. The plaintiff bears the initial burden of establishing the elements of a *prima facie* case, and once a *prima facie* case has been

established, the government bears the burden of showing a compelling interest and that it used the least restrictive means to carry out that interest. *Holt v. Hobbs*, 135 S. Ct. 853, 862 (2015); see *Kaemmerling v. Lappin*, 553 F.3d 669, 677-78 (D.C. Cir. 2008); see also *Gonzales v. O Centro Espirita Beneficente Uniao do Vegetal*, 546 U.S. 418, 428 (2006) (plaintiff carries the initial burden of showing a *prima facie* RFRA case).⁶

As discussed above, USCP’s temporary security measures impose no burden on Plaintiff’s ability to practice his religion, and Plaintiff has provided no evidence to the contrary. Plaintiff may conduct his prayer vigil at another nearby area on the Capitol grounds with a view of the Capitol building without any meaningful burden to his ability to exercise his religion.

C. Defendants Have Not Violated Plaintiff’s Right to Equal Protection Under the Law.

Plaintiff also argues that Defendants violated his equal protection rights by refusing to approve his applications for a demonstration in Area 1 while allowing the American Conservative Union and Representative Bush to hold events in Area 1. Mot. at 22. Because Plaintiff and the Members of Congress who requested and held the other events are not similarly situated in this context, Plaintiff is unlikely to succeed on this claim.

The equal protection principles embodied in the Due Process Clause of the Fifth Amendment direct that “all persons similarly situated should be treated alike.” *Brandon v. D.C. Bd. of Parole*, 823 F.2d 644, 650 (D.C. Cir. 1987) (quoting *Cleburne v. Cleburne Living Ctr., Inc.*, 473 U.S. 432, 439 (1985)). Plaintiff’s claim falls into the category of equal protection claim

⁶ For example, the D.C. Circuit declined to find a *prima facie* violation of RFRA when a plaintiff-appellant failed to show how the government’s collection of DNA substantially burdened any religious exercise. See *Kaemmerling*, 553 F.3d at 679. In *Kaemmerling*, the plaintiff-appellant failed to “state a substantial burden on his religious exercise” because he did not identify any action or practice that would have been burdened by the government’s collection of DNA. *Id.* A desire to have the government conduct its affairs in conformance with a plaintiff’s religious beliefs does not suffice to establish a *prima facie* violation. *Id.* at 680.

known as a “class of one” claim because he is not claiming to be a member of a protected class. “If an individual is not a member of a protected class but is arbitrarily and intentionally treated differently from others who are similarly situated—and the government has no rational basis for the disparity—the individual may qualify as a “class of one” and be entitled to pursue an equal protection claim.” *Vill. of Willowbrook v. Olech*, 528 U.S. 562, 564-65 (2000)).

As discussed above, Plaintiff suggests that his request to demonstrate in Area 1 on September 11, 2021, should be treated similarly to the events held by the American Conservative Union and Representative Bush. Mot. at 22-23. Plaintiff, however, is not a Member of Congress. As discussed above, Members of Congress enjoy distinct privileges regarding activities at the Capitol and they are not subject to the CPB’s regulations regarding demonstrations. *Kroll*, 847 F.2d at 902-03; *see also* 40 U.S.C. § 5104(e)(2)(D), (F), (G), (e)(3). Plaintiff’s application to hold a demonstration in Area 1, therefore, is different from the event in which Representative Bush participated. For the same reason, because Members of Congress strongly advocated that a permit be issued for the American Conservative Union demonstration, that event was approved and held on July 27, 2021. Absent similar involvement by Members of Congress, Plaintiff is subject to the applicable permitting rules. Accordingly, Plaintiff is unlikely to succeed on his equal protection claim.

II. PLAINTIFF HAS NOT ESTABLISHED THAT HE WILL BE IRREPARABLY HARMED IF A TEMPORARY RESTRAINING ORDER IS NOT ISSUED.

Plaintiff’s declaration contains no facts that could support the conclusion that he would be harmed at all if this motion is denied. Nor does the declaration explain why he is unable to hold the prayer vigil at an alternative location offered by the USCP. Plaintiff also fails to explain how the message underlying his vigil would be diluted if he were to hold the vigil at an available

location approved by the USCP. Plaintiff has not come close to establishing the imminent and tangible harm that is required for the drastic remedy of emergency injunctive relief.

The public interest in vindicating expressive activities, particularly in public fora, are widely recognized as among the highest recognized in law and are indispensable to American values. But the public also has a substantial interest in upholding the rule of law by allowing law enforcement to impose reasonable restrictions on public movement based on its assessment of the security risks to the Capitol.

CONCLUSION

Because Plaintiff has not established that he is likely to succeed on the merits of his claims or that he will suffer irreparable harm if a temporary restraining order or preliminary injunction is not granted, Plaintiff's motion should be denied.

Dated: September 8, 2021

Respectfully submitted,

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