

WALSH &
ASSOCIATES, APC

ATTORNEYS AT LAW

DENNIS J. WALSH
GEORGE E. ORDONEZ
ALICE H. CHUNG
MARTIN S. LI
MATTHEW C. WALLIN
ANH NGUYEN
ANTOINE M. PITTS

June 25, 2015

cc: Bill Scroggins
James Caza
Joan Weeks
(KS)

Monica Smith
Hoku Jeffrey
Adam Lerman
Maricruz Lopez
BAMN
P.O. Box 7322
Detroit, MI 48207
email@bamn.com
california@bamn.com

Re: *BAMN presence at Mt. San Antonio Community College District*

Dear Sirs and Madams:

This is a cease and desist notification. We have received complaints from students regarding your organization's conduct on the Mt. San Antonio Community College District ("Mt. SAC") campus, including but not limited to disruptive campus demonstrations, distributing posters and flyers which incite violence, harassment, and intimidation of individuals on our campus.

Mt. SAC is committed to the fostering an environment where the intellectual exchange of ideas and opinions is encouraged. It is also committed to the safety of our students and campus. Students and employees have expressed concerns for their safety. We have received reports that you have engaged in actions that are intimidating and serve to quiet voices of dissent.

Your conduct violates Mt. SAC's Board Policy 3915 (prohibiting distribution of any publications without prior approval by campus President/ CEO), Board Policy 3900 (restrictions on time, place, and manner of speech), Board Policy 3430 (prohibition of harassment).

Speech inciting violence or which has the tendency to incite violence against any member of our campus is strictly prohibited. Harassment and intimidation of our student is prohibited by Board Policy 3430. Mt. SAC reserves the right to exclude from campus those who engage in illegal conduct which disrupts the orderly operation of campus. *Braxton v. Municipal Court*, 10 Cal. 3d 138, 149 (1973) ("the physical intimidation of students, faculty, or staff, obstruction of ingress or egress, and physical intrusion upon or destruction of property can be punished").

BAMN

Re: *BAMN presence at Mt. San Antonio Community College District*

June 25, 2015

Page 2

Individuals who wish to exercise their speech rights must adhere to Mt. SAC's Board Policy 3900 and Administrative Procedure 3900 regarding the time, place, and manner of speech. Mt. SAC campus is a non-public forum except for those areas designated as Free Speech Areas, which are limited public forum. Those who wish to exercise their rights of free expression shall limit their speech to Free Speech Areas, shall not impede the progress of passerby, must not touch or strike passerby, shall not use any means of amplification that tends to disturb the orderly conduct of the campus or classes taking place at that time, shall not disrupt classes or testing, and shall not solicit donations for an organization unless it is registered pursuant to Administrative Procedure 3900.

While Mt. SAC encourages free speech and discussion when such speech is free of threats, harassment, or intimidation, BAMN's demonstrations and distribution of materials labeling students as "rapists," "serial stalker," and "rape defenders" exceed the bound of meaningful protest and discussion and incite violence against our students. You are directed to cease distributing these flyers and comply with Board Policy 3915 and seek approval prior to distributing publications on campus. You are directed to restrict your demonstrations to the time, manner, and place proscribed by Board Policy and Administrative Procedure 3900. You are directed to cease all intimidating and harassing behavior against our students.

Any individual who does not comply with campus directive to leave the campus or willfully reenters within seven days after being directed to leave will be in violation of Penal Code §626.6, a misdemeanor punishable by imprisonment.

Further, your unauthorized misappropriation of the personal photographs in your social media and written publications is also a violation of the privacy of those individuals. Individuals targeted by these distributions have complained of their safety to the college, as you have used their photographs and labeled them as "rape defenders" or "serial stalkers" due to their association with Mr. Brown or because you believe that they have expressed disagreement with your protest. The continued use of their photographs in your print and social media publications amounts to an invasion of privacy.

Should you have any questions or concerns, please direct your inquiries to me.

Sincerely,

WALSH & ASSOCIATES, APC



BY: ALICE CHUNG, ESQ.

cc: David Wilson, Chief of Public Safety
Karen Saldaña, Director, Safety & Risk Management