



**Judicial
Watch®**
*Because no one
is above the law!*

June 30, 2020

Mayor Bill de Blasio
City Hall
New York, NY 10007

Re: Request to Paint Message Along Fifth Avenue Between 81st and 83rd Streets

Dear Mayor de Blasio:

On June 9, 2020, the City's press office issued a press release stating that your administration will work with community activists to paint five streets, one in each borough, to commemorate the Black Lives Matter movement. During a press conference 10 days later, you announced the five locations to include Center Street, in Manhattan; Richmond Terrace, in Staten Island; Joralemon Street, in Brooklyn; 153rd Street in Queens; and Morris Avenue in the Bronx. On June 26th, you also confirmed that "Black Lives Matter" would be painted along Fifth Avenue between 56th and 57th Streets. These paintings are expressive activity.

Judicial Watch, Inc. is a Washington, DC-based, non-profit organization. For more than twenty-five years, Judicial Watch, Inc. has promoted transparency, accountability and integrity in government and fidelity to the rule of law. Our motto is "Because No One Is Above the Law!" – a message that is particularly relevant today because it applies equally to law enforcement and public officials as well as to protesters, looters, and rioters.

Because City streets are now being used as public fora for expressive activity, we would like to have our motto painted along a street, preferably Fifth Avenue between 81st and 83rd Streets. The lettering would be identical in size and color to the lettering used to paint "Black Lives Matter" in the six above-referenced locations. We would pay the cost of the painting, but we would likely need the assistance of the City to aid in traffic diversion and parking restrictions while the painting is completed. Of course, the painting could be completed in the same manner as the other locations.

As the timeliness of our message is important, please respond within 3 working days. If our desired location is not possible, we are open to considering alternative locations.

Thank you for your prompt attention to this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read 'T. Fitton', is positioned below the word 'Sincerely,'.

Thomas J. Fitton
President, Judicial Watch, Inc.