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April 5, 2022

Delivered via email to City Council members at the following addresses:
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CC: Bettendorf City Attorney's Office
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RE: Bettendorf Municipal Code Solicitation in Public Areas Ordinance, § 7-1-1

Dear Councilpersons:

I am writing on behalf of the ACLU of Iowa regarding Bettendorf's Municipal Ordinance § 7-1-1, prohibiting "Solicitation in Public Areas Ordinance" ("the Ordinance"). BETTENDORF, IA MUN. CODE § 7-1-1 (2015), https://codelibrary.amlegal.com/codes/bettendorfia/latest/bettendorf_ia/0-0-0-4811#JD_7-1-1. Since the 2015 landmark decision of *Reed v. Town of Gilbert*, courts around the country have repeatedly found that panhandling ordinances—including some "aggressive panhandling" ordinances with features similar to the ones in Bettendorf ("the City")—violate the First Amendment. *Reed v. Town of Gilbert, Ariz.,* 576 U.S. 155 (2015); *Rodgers v. Bryant,* 942 F.3d 451, 453 (8th Cir. 2019); *see e.g., Norton v. City of Springfield, Ill.* 806 F.3d 411 (7th Cir. 2015); *Thayer v. City of Worcester,* 755 F.3d 60 (1st Cir. 2014), *vacated,* 576 U.S. 1048 (2015), *declaring ordinance unconstitutional on remand*, 144 F.Supp.3d 218 (Mass. Dist. Ct., 2015); *See McCraw v. City of Oklahoma City*, 973 F.3d 1057, 1067-70 (10th Cir. 2020), *cert. denied* 141 S.Ct. 1738 (2021). By 2019, courts had struck down more than 70 anti-panhandling ordinances. *Housing Not Handcuffs: Ending the Criminalization of Homelessness in U.S. Cities*, NAT'L LAW CTR. ON HOMELESSNESS AND POVERTY 80 (2019), https://nlchp.org/wp-content/uploads/2019/12/HOUSING-NOT-HANDCUFFS-2019-FINAL.pdf (hereinafter "*Housing Not Handcuffs*"). And this number continues to rise, with many cities ceasing enforcement or repealing their ordinances.

Cities across Iowa have already repealed their unconstitutional panhandling/solicitation ordinances. For example, following notification letters from the ACLU of Iowa, the cities of Des Moines and Council Bluffs repealed their ordinances in 2018; Grimes partially repealed its

ordinance at that time. *Des Moines City Council repeals city's panhandling ordinances,* Des Moines Register (Oct. 8, 2018), https://www.desmoinesregister.com/story/news/2018/10/08/des-moines-city-council-votes-repeal-panhandling-ordinance-poverty-aclu-iowa-grimes-council-bluffs/1568657002/; *Bluffs council votes to repeal panhandling ordinance*, World Herald News Service, (Sept. 27, 2008), https://omaha.com/eedition/sunrise/articles/bluffs-council-votes-to-repeal-panhandling-ordinance/article_702ed5b2-9660-55ce-a44e-e4cdeba05f8c.html. More recently, the city of Grimes now has also fully repealed its panhandling/solicitation ordinance. (See Ex. 1).

Like the ordinances in these other Iowa cities, Bettendorf's Ordinance is not only a facially content-based restriction on free speech protected by the First Amendment to the United States Constitution and the Iowa Constitution, but it is also harmful and ineffective policy. Numerous examples of better alternatives now exist which the City could draw on. We are asking the City to promptly repeal the Ordinance and instead consider more constructive alternatives. Enforcement of the Ordinance risks potential litigation. Importantly, when it comes to "aggressive panhandling" the City can instead regulate the criminal behavior it is concerned about. It need not, as this Ordinance does, restrict the content of the speech that may accompany that behavior an element of the offense.

The First Amendment protects requests for charity in a public place. *See, e.g., United States v. Kokinda,* 497 U.S. 720, 725 (1990) ("Solicitation is a recognized form of speech protected by the First Amendment."). The government's authority to regulate such public speech is exceedingly restricted, "[c]onsistent with the traditionally open character of public streets and sidewalks . . . ." *McCullen v. Coakley*, 576 U.S. 464, 476 (2014) (quotation omitted). As discussed below, the Ordinance is well outside the scope of permissible government regulation.

The Ordinance is an impermissible content-based restriction.

The Ordinance is an impermissible content-based restriction, as it overtly distinguishes between types of speech based on "subject matter . . . function or purpose." *Reed*, 567 U.S. at 156; *see e.g.*, *Norton* 806 F.3d at 412-13 ("Any law distinguishing one kind of speech from another by reference to its meaning now requires a compelling justification."). In 2019, the Eighth Circuit Court of Appeals affirmed the grant of a preliminary injunction to plaintiffs "challeng[ing] an Arkansas anti-loitering law that bans begging in a manner that is harassing, causing alarm, or impedes traffic." *Rodgers v. Bryant,* 942 F.3d 451, 453 (8th Cir. 2019). The Eighth Circuit determined the law was a content-based restriction because "it applie[d] only to those asking for charity or gifts," and thus "its application depend[ed] on the 'communicative content' of the speech." *Id*. at 456 (quoting *Reed*, 576 U.S. at 163).

Bettendorf's Ordinance similarly regulates a particular form of speech. The Ordinance prohibits all solicitations—"demand[s] or request[s for] an immediate donation or transfer of money or other thing of value"—at certain locations, and requires that people "solicit[ing] funds for personal use on a public right of way," obtain a license from the city." § 7-1-1. The Ordinance also specifically bans solicitation accompanied with listed "aggressive" acts. *Id.* As a result, a court will very likely determine that the Ordinance is a "content-based" restriction on speech that is presumptively unconstitutional. *See Reed,* 576 U.S. at 163.

Courts use the most stringent standard—strict scrutiny—to review such restrictions. *Id*. (holding that content-based laws may only survive strict scrutiny if "the government proves that they are narrowly tailored to serve a compelling interest."). The Ordinance cannot survive strict scrutiny because there is no evidence to demonstrate that it is narrowly tailored to the interests it is purported to serve. Theoretical discussion is not enough: "the burden of proving narrow tailoring requires the [municipality] to prove that it actually *tries* other methods to address the problem." *Reynolds v. Middleton*, 770 F.3d 222, 231 (4th Cir. 2015). The City may not "[take] a sledgehammer to a problem that can and should be solved with a scalpel." *Browne v. City of Grand Junction*, 136 F. Supp. 3d 1276, 1294 (D. Colo. 2015) (holding ordinance restricting time, place, and manner of panhandling was unconstitutional).

The Ordinance is only supported by mere speculation.

When the City first passed the Ordinance, Police Chief Phil Redington commented that panhandling "'[wa]s a public safety concern [for] both . . . drivers and solicitors.'" Derek Anderson, *Bettendorf Passes Panhandling Law*, QUAD-CITY TIMES, Dec. 14, 2004, at A2 (quoting Chief Phil Redington). Chief Redington and Bettendorf's City Attorney at that time, Greg Jager, also insisted the law "[did] not ban panhandling and that it attempt[ed] to put truly destitute persons in touch with people who [could] help them." *Id.* Chief Redington later commented that the panhandling licensing requirement gave Bettendorf police "'an idea of who's out [t]here in case we have problems.'" Sarah Hayden, *Local Panhandlers Maneuver Through Laws, Licenses,* THE DISPATCH, Oct. 27, 2013, at A5 (quoting Chief Phil Redington). Although the licensing process includes a background check, Chief Redington stated that "'if [applicants] have a criminal past, it doesn't prevent them from panhandling.'" *Id.* The licenses are free, but Chief Redington admitted "forcing panhandlers to fill out the paperwork is meant to discourage them from panhandling" by asking applicants if they would rather be connected with social services. *Id*. During the first year of the Ordinance, Bettendorf police "received 27 complaints about panhandlers," and "issued five citations for [O]rdinance violations." Tory Brecht, *Begging Limits, 1 Year Later: Bettendorf's Panhandling Rule Nets 5 Citations*, QUAD-CITY TIMES, Nov. 6, 2005, at A1. In 2015, the City "ha[d] 40 active panhandlers," and "Bettendorf police [had] made 14 arrests and issued 22 bans between 2011 and 2015 at the [C]ity's panhandling hot spots." Jack Cullen, *Bettendorf Aldermen Restrict Panhandling*, QUAD-CITY TIMES (July 23, 2015), https://qctimes.com/news/local/govt-and-politics/bettendorf-aldermen-restrict-panhandling/article_8a7a2f90-d3a7-5522-a6bd-7ceda9700d6e.html. The police also "noted an increase in territorial competition among panhandlers and a rise in arrests," as the City "grant[ed] more licenses." *Id.* In July of 2015, the City amended the Ordinance to include a "prohibit[ion of] panhandling at or within 100 feet of a controlled-access highway or intersection, roadway shoulder or median strip." *Id.*

The City's stated purpose for the Ordinance appears to be to promote public safety. Assuming that the purposes would be considered compelling, the Ordinance could not pass intermediate scrutiny, let alone strict, because it is only supported "by mere speculation or conjecture," and "burden[s] substantially more speech than necessary." *Edenfield v. Fane,* 507 U.S. 761, 770 (1993); *Ward v. Rock Against Racism*, 491 U.S. 781, 799 (1989). Similar to the ordinance struck down in *Thayer v. City of Worcester*, the City's Ordinance only targets the listed conduct connected with requests for immediate donations. 144 F.Supp.3d 218, 228-29 (D. Mass. 2015). The *Thayer* court pointed out that the ordinance prevented solicitors from blocking certain entrances and exits, but did not, for example, prevent a person from "engag[ing] in political

advocacy" in those locations. *Id.* at 227. Bettendorf's Ordinance similarly prevents panhandlers from soliciting for donations at locations such as bus stops or ATMs, but does not prevent other types of speech in such places. § 7-1-1. This focus suggests Bettendorf speculated that those experiencing poverty and homelessness were more likely to be aggressive. Such prejudice indicates the true purpose of the Ordinance is to limit begging.

Besides appearing to be based on mere speculation, the City's Ordinance is underinclusive because it targets only solicitations for immediate donations of money. In *Rodgers,* the Eighth Circuit held that because the law regulated only charitable solicitations accompanied with certain actions, and not "political or commercial" solicitations similarly expressed, the law was underinclusive and therefore not narrowly tailored. 942 F.3d at 457. The Eighth Circuit held that the plaintiffs were likely to prevail in their First Amendment claims because the government offered no explanation why it "single[d] out charitable solicitation," when the actions regulated are "equally dangerous," no matter the content of the speech. *Id*. Because Bettendorf makes a similar content-based distinction in its Ordinance, this focus suggests prejudice against people experiencing homelessness and poverty rather than a concern for public safety. Like the government in *Rodgers,* Bettendorf cannot justify the content-based distinction targeting solicitations for immediate donations of money.

The Ordinance includes a ban on speech that does not threaten public safety and does not create a captive audience.

The City's Ordinance is also overinclusive in that it regulates speech that does not pose a threat to public safety. On remand from the U.S. Supreme Court to make a decision in accordance with *Reed,* the *Thayer* court examined the aggressive panhandling ordinances in *McLaughlin v. City of Lowell* and *Browne v. City of Grand Junction*. 140 F.Supp.3d 177 (D. Mass. 2015); 136 F.Supp.3d 1276 (D. Colo. 2015). Both *McLaughlin* and *Browne* dealt with "almost identical" aggressive panhandling ordinances to the one at issue in *Thayer*, and the courts in both cases struck down the ordinances for not being the "least restrictive means." *Thayer*, 144 F.Supp.3d at 235-36. Using the reasoning from *McLaughlin* and *Browne*, the *Thayer* court also struck down the Worcester ordinance. *Id.* at 237.

Bettendorf's Ordinance also bans solicitations where a solicitor is "[i]ntentionally or recklessly blocking the free passage of the person being solicited." § 7-1-1(A). Normally when confronted with speech that "offends [his] esthetic, if not [his] political and moral, sensibilities," the unwilling listener has "the burden . . . to 'avoid further bombardment of (his) sensibilities simply by averting (his) eyes.'" *Erznoznik v. City of Jacksonville,* 422 U.S. 205, 210-11 (1975) (quoting *Cohen v. California,* 403 U.S. 15, 21 (1971)). Under the captive audience doctrine, the U.S. Supreme Court has "sparingly" allowed regulation of protected speech where "the degree of captivity makes it impractical for the unwilling [listener] to avoid exposure." *Snyder v. Phelps*, 562 U.S. 443, 459 (2011); *Erznoznik,* 422 U.S. at 209. The plurality in *Lehman v. City of Shaker Heights* explained that "'[t]he streetcar audience is a captive audience [because i]t is there as a matter of necessity, not of choice.'" 418 U.S. 298, 302 (1974) (quoting *Public Utilities Comm'n v. Pollak,* 343 U.S. 451, 468 (1952) (Douglas, J., dissenting)). In his concurrence, Justice Douglas used the example that a person at a restaurant is not sufficiently captive because she may "get up and leave" if she "hears disquieting or unpleasant programs in [such a] public place[]."

While the captive audience doctrine may in theory support a ban in very specific circumstances, the City's Ordinance sweeps too broadly in including locations without regard to public safety. *See Consolidated Edison Co. of New York, Inc. v. Public Service Commission of New York*, 447 U.S. 530, 541-42 (1980) ("[T]he First Amendment does not permit the government to prohibit speech as intrusive unless the 'captive' audience cannot avoid objectional speech."). The Ordinance lists a bus stop as an example of such a situation, but just because a solicited person "find[s] it difficult to leave," does not mean the solicitation is "demonstrably more dangerous." *McLaughlin,* 140 F. Supp.3d at 195. As the Supreme Court explained, the fact that a listener on a sidewalk cannot "turn the page, change the channel, or leave the Web site" to avoid hearing an uncomfortable message is "a virtue, not a vice." *McCullen v. Coakley,* 134 S. Ct. 2518, 2529 (2014); *R.A.V v. City of St. Paul, Minn.*, 505 U.S. 377, 386 (1992) ("The government may not regulate use based on hostility—or favoritism—towards the underlying message expressed.").

In holding the Worcester ordinance failed strict scrutiny, the *Thayer* court agreed with the analysis of *McLaughlin* that the ordinances were duplicative of state assault laws that already sufficiently targeted the behavior. *Id.* at 236. The *McLaughlin* court cited *R.A.V. v. City of St. Paul* to find the Lowell ordinance subjected panhandlers to "increased liability" for "engag[ing] in particular expressive acts," even though Lowell had not "demonstrate[d] that public safety require[d] harsher punishments for panhandlers." 140 F.Supp.3d at 193 ("*R.A.V.* instructs that where a law prohibits behavior on the basis of expressive content—even if the underlying behavior may be prohibited constitutionally or already is prohibited—the decision to create an *additional* content-based prohibition must satisfy strict scrutiny."). Bettendorf's Ordinance prohibits a solicitor from "intentionally or recklessly approaching the person being solicited in such a manner as does or is likely to cause the person being solicited to fear imminent bodily harm or the commission of a criminal act upon the person or property of the person being solicited." § 7-1-1(A). Like in *Thayer* and *McLaughlin,* existing laws already prohibit this behavior, and they do so without regard to protected speech. *See* IOWA CODE § 708.1 (2020); BETTENDORF, IA MUN. CODE § 5-5A-1 (2008), https://codelibrary.amlegal.com/codes/bettendorfia/latest/bettendorf_ia/0-0-0-1813. It does not further the City's legitimate interests to subject people experiencing poverty and homelessness to harsher punishments for assault.

The Ordinance also prohibits people from "solicit[ing] money or other things of value . . . [a]t or within a controlled intersection[, in a]ny area within one hundred feet of the outermost line of a controlled intersection[, o]n a median strip[, f]rom the shoulder area of the roadway[, or a]t a controlled access highway." § 7-1-1(B). The U.S. Supreme Court recently denied cert of the U.S. Court of Appeals for the Tenth Circuit's holding against Oklahoma City's ordinance regarding standing or sitting on certain medians. *McCraw*, 973 F.3d at 1057. Not only does Bettendorf's Ordinance restrict protected speech in a traditional public forum like the ordinance held unconstitutional in *McCraw,* but it also goes further by discriminating based on the content of the protected speech. Because it focuses on the "topic discussed or the idea or message expressed," the Ordinance is a content-based regulation subject to strict scrutiny. *Reed*, 576 U.S. at 155. The ordinance cannot survive strict scrutiny because it is based on mere speculation, and it is not narrowly tailored to the interests it is alleged to serve.

The Ordinance's permitting scheme is invalid.

In a traditional public forum, like public sidewalks and medians, regulations on speech are subject to strict scrutiny and must be narrowly tailored to achieve a compelling government interest. *Frisby v. Schultz*, 487 U.S. 474, 481 (1988). A prior restraint is a government regulation which requires a speaker to acquire a permit or license before speaking. *Forsyth Co. v. Nationalist Movement*, 505 U.S. 123, 130 (1992) (noting that an "ordinance requiring a permit and a fee before authorizing public speaking, parades, or assemblies in 'the archetype of a traditional public forum,' is a prior restraint on speech."). Prior restraints bear a "'heavy presumption against [their] constitutional validity.'" *Vance v. Universal Amusement Co.,* 445 U.S. 308, 317 (1980) (quoting *Bantam Books, Inc, v, Sullivan,* 372 U.S. 58, 70 (1963)). While cities may impose permitting requirements on those wishing to hold a march, parade, or rally in the form of valid time, place, and manner restrictions, such schemes must meet certain constitutional requirements. *See Cox v. New Hampshire*, 312 U.S. 569, 574-76 (1941); *Forsyth Co.*, 505 U.S. at 130. Any permit scheme controlling the time, place, and manner of speech must not be based on the content of the message, must be narrowly tailored to serve a significant governmental interest, and must leave open ample alternatives for communication. *Id.*; *United States v. Grace*, 461 U.S. 171, 177 (1983).

Permit requirements targeting single individuals or small groups are unjustifiable. *See Douglas v. Brownell*, 88 F.3d 1511, 1514, 1523 (8th Cir. 1996) (striking a Clive, Iowa ordinance requiring groups of 3 or more demonstrators to obtain a permit in advance of a demonstration, finding a small group was not a significant safety risk); *see also Grossman v. City of Portland*, 33 F.3d 1200 n. 13 (9th Cir. 1994) (noting that city ordinances that had participant requirements of at least 50 people "appear much more narrowly tailored."); *NAACP v. City of Richmond*, 743 F.2d 1346 (9th Cir. 1984); *Rosen v. Port of Portland*, 641 F.2d 1243, 1248 n.8 (9th Cir. 1981) (stating that a 24-hour notice requirement was not narrowly tailored for regulating small groups.). The Eighth Circuit agreed with the demonstrators, noting that for small groups, concerns regarding the disruption of use of the public sidewalks and streets are minimal. *Douglas*, 88 F.3d at 1524. In 2019, the Ninth Circuit Court of Appeals analyzed a permitting scheme requiring individual speakers to "obtain permits before they use[d] sound-amplifying device within the [c]ity [of Vallejo]." *Cuviello v. City of Vallejo,* 944 F.3d 816, 821 (9th Cir. 2019). The Ninth Circuit found the permitting scheme invalid because "'we and almost every other circuit to have considered the issue have refused to uphold registration requirements that apply to individual speakers or small groups in a public forum.'" *Id.* at 829 (quoting *Berger v. City of Seattle*, 569 F.3d 1029, 1039 (9th Cir. 2009)). The *Cuviello* court reasoned that "'[w]ithout a provision limiting the permitting requirements to larger groups, or some other provision tailoring the regulation to events that realistically present *serious* traffic, safety, and competing use concerns . . . a permitting ordinance is insufficiently narrowly tailored.'" *Id.* (quoting *Santa Monica Food Not Bombs v. City of Santa Monica*, 450 F.3d 1022, 1039 (9th Cir. 2006)).

Like the ordinances in *Douglas* and *Cuviello*, Bettendorf's licensure provision would not survive a court's inevitable application of strict scrutiny. Applying the permit requirements to such small numbers of persons (or here, a single individual) is not necessary to protect any compelling government interests." *Douglas,* 88 F.3d at 1524. Further, the Ordinance is not narrowly tailored because it "restricts a substantial amount of speech" that does not interfere with the city's potential legitimate interests. *See id.* Thus, in addition to the impermissible content-based regulation of

speech, wholly prohibiting public speakers without a license from engaging in protected speech in traditional public fora, such as sidewalks and medians, cannot pass constitutional muster.

The Ordinance is harmful and ineffective public policy.

The Ordinance is also ineffective and harmful public policy. Harassing, ticketing, and/or arresting people who ask for help in a time of need is inhumane and counterproductive. Unlawful anti-panhandling ordinances such as Bettendorf's Ordinance are costly to enforce and only exacerbate problems associated with homelessness and poverty. Rather than criminalizing the behavior in the Ordinance, Bettendorf can modify restrictions and infrastructure to optimize pedestrian and traffic safety while avoiding being as prejudicial to those in poverty or as limiting to protected speech. *See Urban Street Design Guide*, NAT;' ASS'N OF CITY TRANSP. OFFICIALS, https://nacto.org/publication/urban-street-design-guide/street-design-elements/ (last visited April 1, 2022); *20 Proven Countermeasures that Offer Significant and Measurable Impacts to Improving Safety*, U.S. DEP'T OF TRANSP. FED. HIGHWAY ADMIN, https://safety.fhwa.dot.gov/provencountermeasures/fhwasa18029/ (last modified Dec. 17, 2019).

Numerous communities have created alternatives that are more effective and leave all involved—homeless and non-homeless residents, businesses, city agencies, and elected officials—better positioned in the long run. *See generally, Housing Not Handcuffs*.

For example, Philadelphia, PA greatly reduced the number of homeless persons asking for change in a downtown subway station by donating an abandoned section of the station to a service provider for use as a day shelter. *See* Melissa Romero, *Suburban Station to Open Permanent Service Hub for the Homeless,* CURBED PHILA. (Oct. 16, 2017), https://philly.curbed.com/2017/10/16/16481552/suburban-station-hub-of-hope-homeless-services; *See also* Nina Feldman, *Expanded Hub of Hope Homeless Center Opening Under Suburban Station,* WHYY (Jan. 30, 2018), https://whyy.org/articles/expanded-hub-hope-homeless-center-opening-suburban-station/. In opening the Center, Philadelphia Mayor Jim Kenney emphasized: "We are not going to arrest people for being homeless." *Expanded Hub of Hope*. Programs like Project HOME's Hub of Hope are how cities actually solve the problem of homelessness, rather than merely attempting to suppress evidence of it.

The optimal outcome for all is a Bettendorf where homeless people are not forced to beg on the streets. But whether examined from a legal, policy, fiscal, or moral standpoint, criminalizing panhandling is not the best way to achieve this goal. Enforcing outdated anti-begging ordinances—whether by means of citations, warnings, or "move-on" orders—unconstitutionally interferes with the speaker's protected free speech rights. Bettendorf must place an immediate moratorium on enforcement of the Ordinance and then proceed with a rapid repeal. Bettendorf can then develop approaches that will lead to the best outcomes for all the residents of Bettendorf, housed and unhoused alike. And in the meantime, police may continue to enforce speech-neutral criminal laws to promote and protect public safety.

As you know, successful claims under the First Amendment to enjoin the Bettendorf Municipal Code Solicitation in Public Areas Ordinance will entitle the prevailing plaintiff to attorney's fees and costs, as authorized by 42 U.S.C. § 1988.

We have learned that some municipalities may have allowed unconstitutional panhandling/solicitation ordinances to stay on the books with no intention of enforcing them. Even if that is the case, it is important to remove the unconstitutional ordinance from the municipal code in order to protect residents from constitutional violations, and to protect the city and its officers from liability.

Grimes provides a cautionary tale: after the ACLU learned that county officers were enforcing the City's remaining unconstitutional panhandling/solicitation ordinance despite the city's determination not to do so, we contacted legal counsel for the city, which, to its great credit, agreed to repeal the panhandling ordinance to avoid future violations. (See Ex. 1). Had the city not taken the step to repeal the ordinance, it risked officers again enforcing it without realizing it had been determined to be unconstitutional.

Bettendorf should not take this risk.

Bettendorf should repeal the Ordinance.

Based on the foregoing, we ask Bettendorf to take the following actions:

1. Stop enforcing the Bettendorf Municipal Code Solicitation in Public Areas Ordinance, §7-1-1. This requires instructing any law enforcement officers charged with enforcing the municipal code that the Ordinance is no longer to be enforced in any way, including by issuance of citations or warnings, or by telling panhandlers to move along.

2. Immediately initiate steps necessary to repeal § 7-1-1.

3. If there are any pending prosecutions under § 7-1-1, dismiss those charges.

Thank you for your attention to this important matter. I ask that you inform me within 14 days of the date of this letter that you agree to undertake all three actions.

Please contact me with any questions about this matter by phone or email at shefali.aurora@aclu-ia.org.

Sincerely,

/s/ Shefali Aurora
Shefali Aurora
Staff Attorney

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