EXHIBIT Q

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December 16, 2024

Iowa Department of Administrative Services
ATTN: Mr. Adam Steen, Director
By email only to: adam.steen@iowa.gov

Re: *The Satanic Temple, Inc. v. Steen* – demand letter, preservation notice

Dear Mr. Steen:

I serve as general counsel for The Satanic Temple, an international religious movement with a congregation in Iowa. This letter arises from a potential legal dispute in which you prohibited my client's holiday event from equal access to State facilities on equal terms as other religious events.[1] I am hopeful that this letter will persuade you to reconsider your decision and reschedule the event for this upcoming Saturday, or otherwise work with me to facilitate my client's free expression and avoid potential litigation.

The event in question had the following itinerary:

> 8:00 am – Setup
>
> 9:00am - 10:00am – Satanic Holiday Carols (*I'll Be Your Mirror* by The Velvet Underground & Nico; *Waiting for the Night* by Depeche Mode, and *Lucifer's the Light of the World* by King Dude)
>
> 10:00am - 12:00pm – Make & Take Ornaments, and Social Time (Ornaments to be constructed from clear plastic globes and items that can be placed in or on them).
>
> 12:00pm - 1:00pm – All Ages Krampus Costume Contest (1st, 2nd, 3rd Place prizes - The winners will be determined by audience votes).
>
> 1:30pm - 2:30pm – Ritual (Ritual participants will form a procession to the display. One will carry a veiled infinity candle, *i.e.*, a flameless LED candle. The ritual leader will give an invocation celebrating both the light and the night. The infinity candle is unveiled. The ritual is concluded).
>
> 3:00/3:30pm - 4:00pm – Teardown and Cleanup

By email dated December 3 (one week before denial), your office requested specification of:

[1] At least one other religious event took place inside the Iowa State Capitol on December 14, 2024.

what particular songs would be sung during the Satanic Holiday Carols segment, images of the ornaments to be created, images of the coloring pages to be colored, images of anticipated costumes, details about the costume contest, and a detailed description of the ritual. This inspection means your determination was "content-based," which is subject to the strictest judicial scrutiny. *See Reed v. Town of Gilbert, Ariz.*, 576 U.S. 155, 163 (2015) ("Content-based laws—those that target speech based on its communicative content—are presumptively unconstitutional and may be justified only if the government proves that they are narrowly tailored to serve compelling state interests.")

Additionally, your denial plainly provides that your determination was content-based. Your email dated December 11 states that the denial was grounded in, "the presence of minors, coupled with the anticipation of costumes with sticks used as weapons on children" which prompted you to believe that the event would be "harmful to minors." There are two problems with your decision.

First, the costume event would not have entailed hitting children. The photograph you referenced is copied below:

No part of any application material suggested that children would be hit. Nor does the photograph you referenced depict children being hit. You simply concocted a false narrative about the contents of my client's speech and then used your lie as a basis to deny the application. Moreover, my client corrected your misunderstanding by informing you that "The sticks are a traditional costume component and *for appearance only,*" expounding that "They were never intended to be used on anyone, and *we never stated that they would be*."

(emphasis added). Yet your determination remained unchanged. And your determination remained unchanged, even after my client struck the costume contest as part of the event. Because the denial was based on your own false narrative, a narrative which you refused to depart from even after confronted with contrary evidence, it is my opinion that your stated basis is a transparent pretext to conceal viewpoint discrimination. *See Cuffley v. Mickes*, 208 F.3d 702, 711 (8th Cir. 2000) ("obviously unreasonable and pretextual" grounds to deny an application as viewpoint discrimination).

Second, the "harmful to minors" doctrine only prohibits sexually explicit material and does not allow the State to prohibit dissemination of violent material. No part of the event was sexual, and even if the denial was based on the impliedly violent nature of a Krampus holding a stick that would still violate the First Amendment. *Brown v. Ent. Merchants Ass'n*, 564 U.S. 786, 793 (2011) ("violence is not part of the obscenity that the Constitution permits to be regulated.")

Based on the foregoing, it is my opinion that your decision to prohibit my client's event was a direct violation of my client's well-established First Amendment rights. Although litigation is immediately permissible, it is my strong preference to avoid court action. You can help facilitate that end by either approving the event to take place this Saturday, December 21 or by reaching out to me to figure out an appropriate alternative time for the holiday event.

The foregoing is based on my present understanding of the facts. Should it become necessary in future proceedings, my client reserves the right to assert additional or different facts or law as may become relevant. Nothing in this letter waives any claim for relief which may arise at law or in equity.

Please preserve all documents and communications pertaining to this issue as litigation appears to be on the horizon.

Sincerely,

s/Matt Kezhaya