



# NYCLU

NEW YORK CIVIL LIBERTIES UNION

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BY HAND DELIVERY

December 19, 2011

S. Andrew Schaffer, Esq.  
Deputy Commissioner for Legal Matters  
New York City Police Department  
One Police Plaza  
New York, NY 10038-1403

Richard B. Clark  
Chief Executive Officer  
Brookfield Office Properties  
Three World Financial Center  
New York, NY 10281

*Re: Christmas Celebration at Zuccotti Park*

Dear Mr. Schaffer and Mr. Clark:

We write to inform you of a Christmas prayer vigil to take place at Zuccotti Park on December 24 through December 26, 2011, and to request that the NYPD and Brookfield Properties accommodate those seeking to celebrate their faith while in the park.

Occupy Faith, which is comprised of members of an Occupy Wall Street Christian interest group as well as those of other faiths, contacted the NYCLU earlier this month to request assistance with holding a 24-hour prayer vigil in Zuccotti Park. The vigil will begin with a midnight service on Christmas Eve and culminate with a closing ceremony at midnight on Christmas Day. (A flier describing the event is enclosed with this letter.) Occupy Faith has plans to bring into the park food for meals as well as bread and sacramental wine for communion. A communion table will be used for such purposes. They also intend to distribute prayer mats and floor padding so that they may kneel in prayer for long periods of time, as well as chairs for the elderly and disabled. In addition, members plan to play musical instruments during their celebration. Finally, Occupy Faith members will use candles for their Advent ceremonies. Occupy Faith believes that bringing these items and engaging in these activities is central to their form of worship.

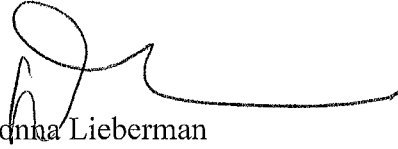
Occupy Faith does not intend to violate the rules of Zuccotti Park. Occupy Faith does not plan on camping, erecting structures, lying on the ground, placing tarps and sleeping bags on the property, or storing personal property in a way which unreasonably interferes with the use of the area by others.

Due to the fact that Brookfield security guards and New York Police City Department (NYPD) officers have previously prevented some individuals from entering the park with items that are similar to those that Occupy Faith intends to bring (for example, food and musical instruments), they are concerned that they will be prevented from bringing some of these items into Zuccotti Park. We write to bring your attention to this matter and to request that individuals will not be restricted from engaging in expressive conduct and bringing these items into the park.

The City has previously enabled religious events to take place in parks, including the mass in Central Park officiated by Pope John Paul II in 1995. We hope that the City and Brookfield can accommodate these individuals who seek to peacefully celebrate their faith in a similar manner.

Please contact Katherine Bromberg by phone at 212-607-3337 or by email at [kbromberg@nyclu.org](mailto:kbromberg@nyclu.org) with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Donna Lieberman', with a long horizontal flourish extending to the right.

Donna Lieberman  
Udi Ofer  
Katherine Bromberg