

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

KRISTI L., et al.,

Plaintiffs,

v.

NATIONAL AIR AND SPACE MUSEUM,  
et al.,

Defendants.

Civil Action No. 23-0335 (ABJ)

**CONSENT ORDER**

**Stipulation of Agreed Facts**

The parties hereby stipulate to the following agreed facts:

A. Plaintiffs represent that they are all citizens of the United States who hold a deep and sincerely held religious belief that unborn babies are created in the image of God, should be protected, and thus, that they should speak up for, and on behalf of the unborn babies.

B. Plaintiffs allege in Paragraph 9 of their Complaint that on January 20, 2023, while visiting Washington D.C. for the annual March for Life event, they were “subject to a pattern of ongoing misconduct” within the Smithsonian’s National Air and Space Museum (“Museum”) by “at least 5 different staff, personnel, employees, and/or security guards of [the Museum] including Defendants Jane and John Does,” who allegedly targeted Plaintiffs and intentionally chilled their religious speech and expression by requiring Plaintiffs to remove or cover their attire because of their pro-life messages.

C. The Smithsonian Institution (“Smithsonian”) represents that it welcomes all visitors without regard to their beliefs. Smithsonian represents that its policy prohibits, among other

things, the displaying or carrying of placards, signs, banners, and flags in Smithsonian museums. Smithsonian represents that its policy does not prohibit visitors from wearing hats or other types of clothing with messages, including religious and political speech.

D. Smithsonian regrets the treatment of Plaintiffs on January 20, 2023, and the failure of its security personnel to properly follow Smithsonian policy and has reminded all security officers stationed at the Museum of the rights of visitors and of the policy set forth in Paragraph C above.

E. Plaintiffs represent that they are fearful that when they return to the Museum during the pendency of this action wearing clothing and other attire containing pro-life messaging, Plaintiffs will be targeted and will not be permitted to exercise their First Amendment right to freedom of speech.

### **Consent Injunction**

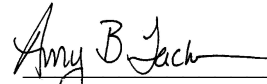
The parties consent to the following as part of the parties' agreement to settle and dismiss this case. Accordingly, IT IS HEREBY ORDERED THAT:

1. Pursuant to Federal Rule of Civil Procedure ("Rule") 65(d), Defendants, their officers, successors in office, employees, and agents are ENJOINED from prohibiting visitors to the Museum from wearing hats or other clothing with messages, including religious and political speech so long as the visitors' conduct is otherwise in compliance with Smithsonian policy, which injunction shall terminate on January 19, 2025.

2. The Smithsonian shall provide a copy of this Consent Order to all security officers stationed at the Museum, as well as other Smithsonian personnel who interact with the public at Museum, including volunteers and museum staff, within seven days of its entry by the Court.

3. In light of this Order, the Consent Order entered by the Court on March 13, 2023 (ECF No. 18) is hereby terminated.

SO ORDERED, this 18th day of March, 2024.

A handwritten signature in black ink, appearing to read "Amy B. Jackson", written over a horizontal line.

AMY BERMAN JACKSON  
United States District Judge