



January 21, 2025

Tulsa City-County Library Commission
c/o Latoya Davis
Chief Executive Assistant to CEO and Board Liaison
Tulsa City-County Library
400 Civic Center
Tulsa, Oklahoma 74103-3830

Sent via U.S. Mail and Electronic Mail (latoya.davis@tulsalibrary.org)

Dear Tulsa City-County Library Commission members:

The Foundation for Individual Rights and Expression (FIRE), a nonpartisan nonprofit that defends freedom of speech, is concerned with Tulsa City-County Library’s alleged treatment—and subsequent suspension—of library patron Allie Snyder, who asserts a pattern of repeated First Amendment violations by the library and its staff.¹ Worse yet, through her suspension and the policy for speakers at Tulsa City-County Library Commission meetings, the library actively continues to violate the Constitution. Tulsa City-County Library must therefore rescind Snyder’s suspension and rectify these constitutional deficiencies.

Background

Our concerns arise from events commencing with Snyder’s June 20, 2024, attendance at a Tulsa City-County Library Commission meeting at the Central Library, after which she explored the facility and visited its children’s section to see if it would be a good place to bring her children. On leaving the children’s section, she saw a table promoting the Summer Reading Program with multiple transgender pride flags and symbols drawn on paper covering the table.

Snyder expressed disappointment at the display, and what she viewed as its promotion of “child medicalization,” to a volunteer staffing the table, who appeared to be a young adult. When the volunteer asked what she meant, Snyder responded that “young girls were being given harmful drugs and surgeries,” some of whom later regret the treatment. She also said, “kids who don’t conform to traditional gender stereotypes are being convinced their bodies are wrong.” The

¹ The narrative in this letter represents our understanding of the pertinent facts, but we appreciate that you may have additional information to offer and invite you to share it with us.

volunteer replied that he was unaware of these things, then expressed some agreement with her. The entirety of the conversation was calm and respectful according to Snyder.

Meanwhile, a library staffer named Rachel Ann Dennis approached Snyder as she was talking with the volunteer and asked what the two were discussing. Snyder informed her, and Dennis asked Snyder if she had children with her, adding that, if not, she should not be near the children's section. Snyder responded by explaining she was vetting the children's section for future visits with her kids. Dennis pivoted by telling Snyder she should not be discussing "politics" with a teenager and told the volunteer to leave.² When Snyder asked Dennis why she was not allowed to talk about the content of a library display, Dennis looked past Snyder to tell someone to "call security to have this woman removed." When, in reaction, Snyder tried to use her phone to record any further interaction, Dennis told her recording in the library is not allowed.³

Once the requested security guard appeared, he instructed Snyder to leave because the library bans recording. When Snyder asked where that policy on recording appears, the guard gave her a card of banned activities as he escorted her out—but it made no mention of video recording.⁴ When Snyder noted as much, a staffer brought a media request to record form,⁵ leading Snyder to note she is a member of the public, not the media. As she continued to wait for staff to find the recording policy, the security guard stated the library is a "safe place for everyone, including transgender people." When Snyder opined the library was not a safe place for her, the security guard said if she "wanted to use the library," she "should not talk about [her] views." A librarian eventually gave Snyder a flyer with the ban on filming and photography,⁶ and told Snyder she should understand the library has an obligation to keep volunteers safe from "strange adults."

Before Snyder left, she told the librarian she planned to file a formal complaint against Dennis, and the librarian gave her a form to do so. However, Snyder ultimately decided not to submit it because she wanted to raise the incident at an upcoming Library Commission meeting, the rules for which prohibit commenters from discussing, among other things, pending employee complaints.⁷ Snyder's expectation of being able to do so rested on the librarian telling her that her removal was only temporary, and that she was welcome to come back another day.

But when Snyder attempted to attend the August 15 Commission meeting at Hardesty Regional Library, a security guard stopped her and said she was suspended from the library pursuant to

² Snyder was not aware that the volunteer was a minor before this point.

³ Snyder kept her phone angled to capture only Dennis, but even so did not actually manage to record anything.

⁴ A photograph of the card is enclosed.

⁵ Copy Enclosed.

⁶ A photograph of the flyer is enclosed.

⁷ Tulsa City-County Library Commission, *Request to Speak on Nonagenda Items*, [https://go.boarddocs.com/ok/tulsalib/Board.nsf/files/CWJRUY6EEEEBB/\\$file/Request%20to%20speak%20on%20nonagenda%20items%20October%202023.pdf](https://go.boarddocs.com/ok/tulsalib/Board.nsf/files/CWJRUY6EEEEBB/$file/Request%20to%20speak%20on%20nonagenda%20items%20October%202023.pdf).

a June 25 letter from Central Library Manager Buddy Ingalls that the guard then gave Snyder.⁸ The letter purported to suspend Snyder for three months, effective immediately, claiming that on June 20 she had “inappropriately engaged with a juvenile library volunteer,” “began filming without prior authorization,” and “created a disturbance” that led library staff to ask her to leave “for the day.” The letter threatened that any attempt to visit any library property during her suspension would result in trespassing charges and notification of law enforcement, and that even though the suspension period ended on September 20, she would have to meet with either Ingalls or Security Manager Anthony Davis before the library would lift the suspension.

Snyder was allowed to speak at the meeting, but security made her wait outside the library until her turn. Afterward, as Snyder started to depart, a security guard repeatedly urged her to “go ahead and leave” as he walked her towards the exit.

On August 22, Snyder appealed her suspension to Library Chief Executive Officer Kimberly Johnson, detailing the events of June 20 and lack of prior notice of the suspension.⁹ After multiple follow-ups, by letter on September 5, the library rejected the appeal, stating the appeal process was only for indefinite suspensions.¹⁰ Despite this, the letter reiterated that Snyder needed to meet with Ingalls before her suspension could be lifted, claiming such a meeting with library leadership in these circumstances is standard practice.

Legal Analysis

The library’s treatment of Snyder violated the First Amendment and continues to impose ongoing violations, including punishing non-disruptive interactions and unconstitutionally applying a filming policy. It also maintains unconstitutional Commission meeting policies that the library must rectify.

Dennis’s confrontation with Snyder

Dennis’s directives to Snyder to stay away from the children’s section without children and to refrain from discussing certain topics with volunteers violated not only the library’s own policies, but also the First Amendment.¹¹

⁸ Enclosed. Despite the letter’s date, August 15 was the first time Snyder had seen it or otherwise learned of any suspension. In a later September 5 letter (enclosed), the library said it had no address for her and conceded the June 25 letter was hand-delivered on August 15 at Hardesty Regional Library.

⁹ Ms. Snyder’s appeal letter is enclosed.

¹⁰ Copy of letter enclosed.

¹¹ The lack of a legal basis for Dennis’s directives to Snyder, and especially the security guard’s comments about how Snyder should not talk about her views at the library, suggest the library’s treatment of her was based on hostility to her viewpoint. If so, that would make the library’s unconstitutional actions even more problematic, as viewpoint discrimination is an “especially egregious” First Amendment violation, *Ctr. for Investigative Reporting v. SEPTA*, 975 F.3d 300, 313 (3rd Cir. 2020), that represents “censorship in its purest form,” *Bible Believers v. Wayne Cnty.*, 805 F.3d 228, 248 (6th Cir. 2015) (quoting *Perry Educ. Ass’n v. Perry Local Educators’ Ass’n*, 460 U.S. 37, 62 (1983) (Brennan, J., dissenting)).

Library policy explicitly states that “all customers are free to use any public area within the library.”¹² But even if the library does have a policy against unaccompanied adults in children’s sections, it is unconstitutional. The Supreme Court has long held “in a variety of contexts” that the “Constitution protects the right to receive information,”¹³ which courts have held extends to access to public libraries.¹⁴ And there are obvious valid reasons for “unaccompanied adults” to be in a children’s section, like finding books for their kids or, as in Snyder’s case, evaluating the section for them. Any purported restriction on unaccompanied adults accessing a library’s children’s section unconstitutionally infringes their right to access library resources.

There was also no legal basis for Dennis to try to bar Snyder from having a civil, non-disruptive conversation about “politics” with a teenaged library volunteer. The library appears to believe teenagers are sufficiently mature to volunteer at a table, so if a member of the public asks them about imagery drawn on that table, it can hardly constitute “inappropriately engag[ing] with a juvenile.” The library does not have any published policies against talking to minors. And even if such a policy existed, it would be a clear violation of the First Amendment, which would not tolerate a general ban on communication with an entire class of people. Even a more circumscribed ban on discussing “politics” could not stand, as it is hard to envision a compelling governmental interest it would serve,¹⁵ and it would be unconstitutionally vague.¹⁶

The recording ban infringes on First Amendment protected activity

The library’s reaction to Snyder’s unsuccessful effort to record her interactions with library staff, and the policies that may relate to it, cannot be squared with the First Amendment. Even assuming without conceding that some limit on filming inside a library may be constitutionally permissible, the First Amendment does not permit the kind of sweeping ban applied to Snyder, whether or not that was the policy’s intent.¹⁷ The U.S. Court of Appeals for the Tenth Circuit, whose decisions bind Tulsa City-County Library, has held “videorecording is ‘unambiguously speech-creation,’” and recording interactions with public officials and employees is especially

¹² Tulsa City-County Library, *Child Safety in the Library*, https://www.tulsalibrary.org/sites/default/files/2024-02/Child%20Safety%20-%20Appendix_0.pdf.

¹³ *Bd. of Educ. v. Pico*, 457 U.S. 853, 867 (1982) (quoting *Stanley v. Georgia*, 394 U.S. 557, 564 (1969)).

¹⁴ *Doe v. City of Albuquerque*, 667 F.3d 1111, 1118–20 (10th Cir. 2012).

¹⁵ *See Reed v. Town of Gilbert*, 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.”).

¹⁶ *See Minn. Voters All. v. Mansky*, 585 U.S. 1, 16–19 (2018).

¹⁷ Dennis’s interpretation of the library’s filming policy applicable to “media” to interfere with Snyder was dubious and quite possibly pretextual. The QR code on the flyer Snyder received links to the media request form she had been handed earlier. One page for which the flyer provides a URL states that “[b]efore filming on any Tulsa City-County Library location or event, members of the media or independent filers must complete and submit [a] waiver and acknowledgement.” TULSA CITY-COUNTY LIBRARY, *About*, www.tulsalibrary.org/about. The page also says photography and filming requests must be submitted at least 30 days in advance. Neither “member of the media” nor “independent filer” reasonably apply to Snyder, who spontaneously tried to use her cell phone to record her unexpected interaction with Dennis, and the rule’s terminology, extended notice period, and link to a media request form seem to indicate it applies to those wishing to conduct professional interviews, filming, or photography—activities that may involve substantial coordination, equipment, or disruption to the library environment.

protected: “Filming the police and other public officials as they perform their official duties acts as ‘a watchdog of government activity’ and furthers debate on matters of public concern.”¹⁸

If the filming and photography ban on the flyer handed to Snyder *was* meant as categorical, the policy itself—not just its application to Snyder—violates the First Amendment. As noted, the “First Amendment protects the right to gather information about what public officials do on public property,”¹⁹ a principle that, the Tenth Circuit highlights, has been affirmed by “several” circuits.²⁰ And even beyond filming public officials, such a sweeping ban would reach activities as innocuous as a dad photographing a book cover to ask his wife if their daughter has read it, or study partners taking pictures of each other’s notes. Banning these activities would fail First Amendment scrutiny as it would not pass even the relatively lenient test of reasonableness.²¹ Consequently, the library should either revise the ban on filming and photography to make clear it does not infringe constitutionally protected activity or rescind the policy altogether.

Commission meeting rules

Though the library allowed Snyder to speak at the August 22 Commission meeting, its enforcement of her suspension unconstitutionally barred her from hearing the rest of the meeting,²² and she spoke subject to an unconstitutional policy for requests to speak on non-agenda items.

The Request to Speak on Nonagenda Items policy prohibits comment on any of the following:²³

- An issue in a pending lawsuit, complaint or investigation filed with an outside agency, wherein the Tulsa City-County Library employee(s) or Commission is a party;
- A pending grievance filed under any Tulsa City-County Library policy;
- A pending employee complaint filed with the Tulsa City-County Library or an outside agency;
- A complaint against individual employee(s);
- Any employee disciplinary action including suspension or termination.

¹⁸ *Irizarry v. Yehia*, 38 F.4th 1282, 1289 (10th Cir. 2022) (quoting *Animal Legal Def. Fund v. Kelly*, 9 F.4th 1219, 1228 (10th Cir. 2021)) (internal citations omitted) (quoting *Leathers v. Medlock*, 499 U.S. 439, 447 (1991)).

¹⁹ *Smith v. City of Cumming*, 212 F.3d 1332 (11th Cir. 2000).

²⁰ *Western Watersheds Project v. Michael*, 869 F.3d 1189, 1196 (10th Cir. 2017) (collecting cases).

²¹ The Tenth Circuit has held libraries are designated public forums where “the government may only impose content-neutral time, place, and manner restrictions that: (a) serve a significant government interest; (b) are narrowly tailored to advance that interest; and (c) leave open ample alternative channels of communication.” *Doe*, 667 F.3d at 1128–31 (quoting *Shero v. City of Grove*, 510 F.3d 1196, 1203 (10th Cir. 2007)). A blanket ban on filming and photography without prior approval is hardly narrowly tailored. Even analyzed under the more lenient standard applicable to nonpublic forums where time, place, and manner restrictions need only be reasonable (and viewpoint-neutral), *Mansky*, 585 U.S. at 12, a blanket ban fails.

²² See *Shero v. City of Grove*, 2006 U.S. Dist. LEXIS 80462 at *12–13 (N.D. Okla. Nov. 2, 2006); *Ritchie v. Coldwater Cmty. Schs*, 947 F. Supp. 2d 791, 811 (W.D. Mich. 2013); *Berlickij v. Town of Castleton*, 248 F. Supp. 2d 335, 344 (D. Vt. 2003); *Rowe v. Brown*, 157 Vt. 373, 375–76 (Vt. 1991).

²³ *Request to Speak on Nonagenda Items*, *supra* note 7.

These restrictions violate First Amendment protections applicable to comment portions of public meetings.

Library Commission meetings are arguably designated public forums,²⁴ in which “the government may only impose content-neutral time, place, and manner restrictions that: (a) serve a significant government interest; (b) are narrowly tailored to advance that interest; and (c) leave open ample alternative channels of communication.”²⁵ The Tenth Circuit has already confronted—and invalidated—a restriction on citizens discussing lawsuits or employee matters in a designated public forum.²⁶

In *Mesa v. White*, the court recognized “commissioners may well have an interest” in discussing “sensitive personnel or litigation matters” in private but held it difficult to see “how that interest translates into a significant interest in restricting the public’s ability to present its views on personnel or litigation matters at a public meeting.”²⁷ The court further noted the “performance of public employees and the handling of employment-related litigation can be important matters of public concern,” and public officials have an easy solution to maintain confidentiality: “they can just sit and listen and then discuss matters . . . among themselves at a closed meeting.”²⁸ Furthermore, as members of the public already indisputably have the right to discuss such matters outside Commission meetings, including on social media, restrictions of this sort do little more than create a barrier for citizens to discuss matters of public concern directly with public officials.

Additionally, bans on discussing complaints or grievances are viewpoint discriminatory. Regardless of how a body frames a ban, “a complaint is not a topic; it is a viewpoint about a topic.”²⁹ Indeed, “it is difficult to imagine a more content-based prohibition on speech than a policy which allows expression of two points of view (laudatory and neutral) while prohibiting a different point of view (negatively critical) on a particular subject.”³⁰ As a ban on discussing complaints or grievances is viewpoint discriminatory, such bans are impermissible regardless of forum type.³¹

²⁴ See *Shero*, 510 F.3d at 1202–03 (acknowledging that under Tenth Circuit precedent, “it is not entirely clear whether a city council meeting should be treated as a ‘designated public forum’ or a ‘limited public forum’” but analyzing a time restriction under the standard for a designated public forum); *Mesa v. White*, 197 F.3d 1041, 1044 (10th Cir. 1999) (accepting the district court’s holding that a county commission meeting was a designated public forum). Notably, Tulsa City-County Library has not restricted Commission meetings to particular people or topics, a practice which distinguishes a limited public forum. *Shero*, 510 F.3d at 1202.

²⁵ *Doe*, 667 F.3d at 1128–31 (quoting *Shero*, 510 F.3d at 1203).

²⁶ *Mesa*, 197 F.3d at 1047.

²⁷ *Id.* at 1046.

²⁸ *Id.*

²⁹ *Spiehs v. Lewis*, 2024 U.S. Dist. LEXIS 226266 at *27 (D. Kan. Dec. 13, 2024).

³⁰ *Id.* at *28 (quoting *Baca v. Moreno Valley Unified Sch. Dist.*, 936 F. Supp. 719, 730 (C.D. Cal. 1996)) (cleaned up).

³¹ *Ctr. For Investigative Reporting*, 975 F.3d at 313.

The policy’s mandates that the “individual dignity of Commission members, Tulsa City-County Library employees and members of the public must be respected by all speakers” and that “Commission members, employees and members of the public will not be subjected to verbal abuse”³² are similarly unconstitutional, on two counts. First, these, too, amount to viewpoint discrimination because “[g]iving offense is a viewpoint,”³³ and a restriction on verbal “abuse” is “plainly” “impermissible viewpoint discrimination” because it “prohibit[s] speech purely because it disparages or offends,” not because it causes actual disruption.³⁴ Second, these non-disparagement rules are unconstitutionally vague given the lack of standards for what qualifies as “disrespectful” or “verbal abuse.”³⁵

These constitutional infirmities are exacerbated by the requirement for those wishing to speak on non-agenda items to seek approval by listing the subjects they wish to address on a prescribed form for review by the library attorney.³⁶ Making comments subject to approval by a government official, without any explicit guidelines for granting that approval, unconstitutionally confers unfettered discretion to decide what subjects to allow.³⁷

The required week’s notice for the library attorney’s review is also constitutionally suspect. Notice requirements that courts have upheld for public demonstrations—which, unlike a Commission meeting, may require increased police presence or measures for traffic control—have “most generally been of less than a week.”³⁸ It is unclear why Tulsa City-County Library needs at least a week’s notice for someone to speak for three minutes at a Commission meeting when cities often need less time to approve marches and parades.

Potential application of these rules to Snyder illustrates the constitutional problems. Snyder should not have felt the need to forego filing a formal complaint against Dennis to ensure she would be allowed to speak. Rather, she should be allowed to address the Commission regarding the unconstitutional treatment she suffered—regardless of whether Commission members find her comments subjectively disrespectful—and to do so without notifying the Commission a week in advance or receiving prior approval.

³² *Request to Speak on Nonagenda Items*, *supra* note 7.

³³ *Matal v. Tam*, 582 U.S. 218, 243 (2017).

³⁴ *Ison v. Madison Local Sch. Dist. Bd. of Educ.*, 3 F.4th 887, 894 (6th Cir. 2021).

³⁵ *Grayned v. City of Rockford*, 408 U.S. 104, 108–109 (1972) (“... if arbitrary and discriminatory enforcement is to be prevented, laws must provide explicit standards for those who apply them. A vague law impermissibly delegates basic policy matters to policemen, judges, and juries for resolution on an *ad hoc* and subjective basis, with the attendant dangers of arbitrary and discriminatory application.”).

³⁶ *Request to Speak on Nonagenda Items*, *supra* note 7.

³⁷ *See Forsyth Cnty. V. Nationalist Movement*, 505 U.S. 123, 130 (1992) (“A government regulation that allows arbitrary application is ‘inherently inconsistent with a valid time, place, and manner regulation because such discretion has the potential for becoming a means of suppressing a particular point of view.’”) (quoting *Heffron v. Int’l Soc’y for Krishna Consciousness, Inc.*, 452 U.S. 640, 649 (1981)).

³⁸ *Sullivan v. City of Augusta*, 511 F.3d 16, 38 (1st Cir. 2007).

Conclusion

Tulsa City-County Library committed—and continues to commit—multiple First Amendment violations. Most immediately, the library must lift Snyder’s suspension without requiring her to attend a meeting with library officials. Although staff initially led Snyder to believe she was required to leave only “for the day,” the June 25 letter imposed a three-month suspension. It additionally imposed a requirement for Snyder to meet with Ingalls or Davis, and because she has not done so, the suspension remains in place indefinitely. Because Snyder’s actions on June 20 were constitutionally protected, library officials had no lawful authority to eject or suspend her from the library, and they must immediately and unconditionally rescind the suspension.

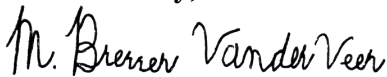
To further rectify its constitutional violations, the library should:

- confirm that Snyder, and other adults, may freely access the children’s section;
- confirm there is no ban on discussing “politics” with library volunteers or minors;
- rescind the policy against recording or revise it to clarify it does not apply to recording interactions with library staff or non-disruptive personal uses;
- instruct staff on basic First Amendment principles, including the prohibition on viewpoint discrimination;
- discard all records of any alleged wrongdoing by Snyder in relation to her June 20 and subsequent interactions with the library; and
- amend the rules for speakers at Commission meetings to be constitutionally compliant.

For any policies needing revision, FIRE would be happy to assist Tulsa City-County Library free of charge.

We respectfully request a substantive response to this letter no later than February 4, 2025.

Sincerely,



M. Brennen VanderVeen, Esq.
Program Officer, Public Advocacy

Encl.

ACTIVITIES NOT ALLOWED IN THE LIBRARY

- Harassment – physical, sexual or verbal abuse of other library users or staff
- Abuse or destruction of library facilities, equipment or materials
- Noisy, unruly or offensive behavior – including excessively loud phone conversations or ring tones
- Intoxicated behavior
- Possession of alcoholic beverages or illegal drugs
- Loitering
- Soliciting, panhandling, begging
- Stalking
- Use of tobacco (including Electronic Vapor and e-cigarettes) within the building or within 25 feet of an entrance
- Inappropriate displays of affection
- Sleeping
- Excessive body odor or extremely unclean clothing
- Bathing, washing clothes, shaving or cutting hair
- Wearing skates, cleats, sagging pants or other inappropriate attire (Shoes and shirts are required.)
- Using wheels on shoes (Heelys)

Any violation of these rules will be subject to suspension from the library for a period of time.

WAIVER AND ACKNOWLEDGMENT ONSITE MEDIA/FILM REQUEST



This waiver and acknowledgment has been signed on the date set forth below by the undersigned in favor of the Tulsa City-County Library's Public Relations Policy regarding onsite media/film requests. A TCCL staff member will notify the undersigned of approval for this request.

The undersigned acknowledges, understands and agrees as follows:

- The undersigned agrees to list intent of onsite media/film request in the space provided below
- The undersigned agrees to use media and film materials in an appropriate manner which reflects the original intent provided
- If the intent of the media/film request does not directly relate to the library, the undersigned agrees NOT to include any audio or video elements which may identify the library or its location
- The undersigned agrees NOT to capture images, video or audio of library staff without prior consent
- The undersigned acknowledges and understands that onsite media/film approval does not necessarily reflect library endorsement

The undersigned has evidenced their acknowledgment, understanding and agreement with respect to the foregoing by signing this document below.

I ACKNOWLEDGE that I have received and reviewed this document.

Name: _____

Signature: _____

Date Signed: _____

Organization: _____

Contact Phone or Email: _____

Library Location: _____

**Date and Time of
Filming (if not today):** _____

Request Intent: _____

STAFF USE ONLY

For requests that require prior approval, send completed form to PRO to start the approval process. If the request is approved on-site by the manager, sign and date below and send to PRO for our records.

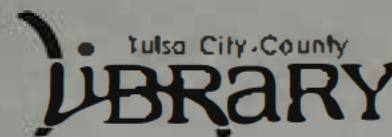
Approver: _____ **Date:** _____

FILMING AND PHOTOGRAPHY ARE NOT ALLOWED AT TULSA CITY-COUNTY LIBRARY WITHOUT PRIOR APPROVAL.

This includes filming and photography in reserved meeting rooms. Scan the QR code, ask staff at this location or call 918-549-7323 for an **Onsite Media/Film Request** form in advance of your requested date.



For more information, visit www.TulsaLibrary.org/about
and www.TulsaLibrary.org/using-the-library.





400 Civic Center • Tulsa, Oklahoma 74103-3830
918.549.7323 (ph) • 918.549.7379 (t) • TulsaLibrary.org

Tuesday, June 25, 2024

Allie Snyder

Dear Ms. Snyder,

This letter is to inform you that you are suspended from all Tulsa City-County Libraries, services and buildings for three months. This suspension is effective immediately. The library is taking this action based on your behavior at Central Library on June 20, 2024.

On June 20, 2024, you inappropriately engaged with a juvenile library volunteer. When you were questioned and asked to leave the area, you began filming without prior authorization, which is against library rules. Your behavior created a disturbance and you were asked to leave the premises for the day.

Ms. Snyder, your behavior violates Library Policy and Rules of Conduct. During this three-month suspension, you will not have access to library services. Attempting to visit any library property during this period will be considered trespassing and the appropriate law enforcement agency will be notified.

Before your library privileges are reinstated on September 20th, 2024 you must arrange a meeting with myself or Anthony Davis, Security Manager.

Sincerely,

A handwritten signature in black ink that reads "Buddy Ingalls". The signature is stylized and written in a cursive-like font.

Buddy Ingalls, Central Library Manager

CC: Ellen Cummings, Chief Operating Officer
Anthony Davis, Security Manager



400 Civic Center • Tulsa, Oklahoma 74103-3830
918.549.7323 (ph) • 918.549.7379 (f) • TulsaLibrary.org

September 5, 2024

Allie Snyder

Re: Allie Snyder Suspension from TCCL

Dear Ms. Snyder,

TCCL is in receipt of your library suspension appeal. The suspension appeal process is for indefinite suspensions that do not have an end date. With regard to your suspension set to end on September 20, 2024, we followed our normal process to review the incidents and statements and issue a suspension time based on this information. Library leadership rendered a three-month suspension. Because you are not a library card holder, we had no address for you. The appeal will remain in place until you have met with Buddy Ingalls, Manager of Central Library, which is the case with every suspension issued. Meeting with designated TCCL leadership is mandatory before a suspension is completed, as was explained in the letter you were hand-delivered on August 15th at Hardesty Regional Library.

Again, you can set up a meeting with Central Library Manager, Buddy Ingalls, by calling 918.549.7323.

Sincerely,

A handwritten signature in black ink, appearing to read "Ellen Cummings", is written over the typed name and title.

Ellen Cummings, MLIS
Chief Operating Officer,
Tulsa City-County Library
400 Civic Center
Tulsa, OK 74103

Kimberly Johnson
Chief Executive Officer
Tulsa City-County Library
400 Civic Center
Tulsa, OK 74103

Re: Appeal of Allie Snyder library suspension

Dear CEO Johnson,

Under the Tulsa City-County Library's policies, I respectfully appeal my suspension from the Tulsa City-County Library effective June 25, 2024. I only received notice of this suspension on August 15, 2024 when I attempted to attend the Library's board meeting. The Library is open to the public. To issue a suspension, the Library must provide notice of the allegations against me and an opportunity to respond. The Library here gave me neither. It imposed a suspension without my knowledge and didn't even notify me after the fact.

The suspension notice accused me of "inappropriately engag[ing] with a juvenile library volunteer." I did no such thing. The notice also alleges I filmed in the Library without prior authorization in violation of Library rules. I did not know and had never been given notice that Library policy prohibits filming without authorization in a public place. When I asked the security guard to show me where that policy was publicly posted, he could not. Additionally, significant First Amendment concerns exist with that policy. I therefore respectfully request that the Library rescind the suspension letter dated June 25 without a requirement to meet with any Library official. At the very least, the Library should clarify that I did not inappropriately engage with any juvenile.

Background

On Thursday, June 20, 2024, I attended the Tulsa City-County Library Commission meeting at the Central branch. This was the third time I had visited the Central branch, and during each visit I noticed a large table in the main room on the way to the children's section that was draped with a large trans flag (the flag consisting of blue, pink, and white horizontal stripes) and upon which various books highlighting gender ideology (affirming a gender identity inconsistent with a person's sex) were displayed. In April and May the display featured a Bingo game for the "@TransRightsReadathon." On June 20th, the table was still draped with the trans flag, but the books had been changed to highlight various different "gender identity" flags, with descriptions for each "identity" and bookmarks in each book with corresponding "identities" featured.

After the meeting, I continued to explore the Library. I went to the children's section and looked at some of the books there because I wanted to know whether it would be a

good place to take my children. On my way out of the children's section, I saw a table to encourage children to sign up for the summer reading program. A young person who I believed to be male was sitting at the table.

As I was passing by, I saw multiple transgender pride flags and symbols drawn on the butcher paper on top of the table. Because the purpose of the table appeared to be to discuss issues relating to children's summer reading, I pointed to the flag and respectfully said to the person at the table how sad it made me to see the library promoting child medicalization. The person, who appeared to be at least a late Teenager, asked what I meant and said it was the flag for "trans rights."

I explained that I'm from California and that I'd met a lot of young people there who'd been harmed by the gender medical industry. I explained that young girls were being given harmful drugs and surgeries. I said I had met Layla Jane who'd lost her breasts when she was only 13, Chloe Cole who was 15, Luka Hein who was 16 and others, and that now each of these young women had profound regrets. I said how sad it was that kids who don't conform to traditional gender stereotypes are being convinced their bodies are wrong all under the banner of this flag.

The person said he had no idea this was happening, and he agreed it was awful that people were being hurt that way. I reassured him these surgeries weren't happening in Oklahoma because there are laws to protect kids here, but that states like California were luring children away by promising them these procedures. Our conversation was respectful at all times.

At this point a female Library staffer came over to the table and asked what we were talking about. I explained some of the things we'd been discussing, and she asked if I had children with me. She said I shouldn't be there if I didn't have children. I told her I do have children, but I was checking the Library out to see if it was a place I wanted to bring them. She then told me that I shouldn't be discussing "politics" with a teen. I told her that if these images were at the table I should be able to discuss them. She looked over my shoulder and told someone to "call security to have this woman removed." She was so hostile that I brought my phone up to record as a way to protect myself. She told me I wasn't allowed to record in the Library, and she told the teen to leave the table.

I kept my phone angled only on her but did not actually manage record the interaction. At this time a security guard approached and told me I had to leave because the Library has a policy against recording. I asked to see where the policy was posted because I'd never seen such rule. He told me it was posted upfront, so as we walked to the front, I asked him to show me.

He looked around and could not find it. He then told me it was on the card he handed me listing prohibited activities. It was also not listed on the card. I said I would wait at the front for a librarian to produce this policy. After a few minutes, a staffer came up and handed me a media

request to record form, to which I replied that I'm a member of the public, not the media. I said I would continue to wait for the library to produce this policy for me. As we were waiting the security guard explained this was a "safe place for everyone including transgender people." I replied that it obviously wasn't a safe place for me, and he said that if I wanted to use the library, I should not talk about my views. He asked what I would say if he told me my shirt (which had the definition of the word woman on it) was offensive to him. I told him it wouldn't bother me if he told me he was offended.

Eventually, another librarian came to speak to me and handed me a printout of the policy stating filming and photographs are not allowed in the library without prior authorization. This librarian asked me if I had seen the shirt the volunteer was wearing which indicated the person was a teen. I replied that I had not because I was too busy looking at the trans flags on the table to notice. She further told me I should understand the library had an obligation to keep these volunteers safe from strange adults. I explained we were having a calm and respectful conversation, and that if these images are on the table in front of these teens, and on display in the main room, we should be able to discuss them. She said they have no control over what the teens themselves drew on the butcher paper. I told her the library is clearly promoting this ideology to children, and that the ideology is leading directly to medical and emotional harm.

I asked her for the name of the staffer who called security on me, and she told me her name is Rachel Ann Dennis. I let her know I planned to file a formal complaint against Dennis's treatment of me, which was extremely hostile and inappropriate. She gave me a form to do so. She also explained that this was just a temporary removal and that I was welcome to come back another day. I then left the library. No one at that time told me I would be suspended from the library. I elected to not pursue the formal complaint, because I determined I wanted to instead address the board at an upcoming meeting.

Analysis

Public libraries—as their name indicates—are open to the general public as places to receive information. Therefore, any suspension from a library triggers due process and First Amendment scrutiny. Such a suspension requires—at a minimum—notice of the allegations against me and an opportunity to respond. The Library gave me neither. I only found out on August 15, 2024 that I was suspended effective June 25. That June 25 letter has no address of mine to which it was sent (because the Library doesn't have my address). I never received that letter. Therefore, the Library's suspension is improper, and I respectfully request the Library rescind it immediately without the requirement to meet with any Library official.

Had I received an opportunity to respond to the allegations against me, I would have shown that I never inappropriately engaged with any juvenile (and would never do so). The person at the table did not appear very young, and I did not know at the time that the person was a juvenile. At all times, I obeyed Library policy when interacting with that

person. I obeyed the Library's cardinal command of "RESPECT." The person was sitting at a table soliciting a children's summer reading list. The children's section contained transgender-identifying materials and the table itself had images of the transgender pride flag. I therefore reasonably understood that conversation on that topic was appropriate and relevant to the children's reading list. I offered my opinion respectfully to the person sitting at the table. At no time did that person express discomfort or even appear uncomfortable. Indeed, the Library's own policy on Child Safety notes that the Library is a public place and that "children left unattended in the library" must "be mature enough" to operate independently.

When confronted by Library officials, I remained respectful (even though they were hostile to me). When I attempted to film the resulting conversation, I did not know that the library prohibited such recording. I tried to record because in California I had been the victim of a First Amendment violation by a library. The ban on recording was not publicly posted. And such a ban appears to be inconsistent with the First Amendment. Libraries are open to the public, and a categorical ban on recording in a public place raises serious First Amendment implications.

Therefore, my suspension does not have either an adequate legal or factual basis. I respectfully request the Library rescind it. The Library should at least clarify that I did not inappropriately engage with any juvenile.

Respectfully,

Allie Snyder

cc:

Buddy Ingalls, Central Library Manager
Ellen Cummings, Chief Operating Officer
Anthony Davis, Security Manager