



TULANE UNIVERSITY LAW SCHOOL
TULANE LAW CLINIC

Civil Rights & Federal Practice Clinic
Criminal Justice Clinic
Domestic Violence Clinic
First Amendment Clinic

Immigrant Rights Clinic
Juvenile Law Clinic
Parole Opportunity Project
Women's Prison Project

April 26, 2022

Lafayette Public Library Board of Control
Attn. President Robert Judge
P.O. Box 3427
Lafayette, La 70502

Re: Ms. Lynette Mejia, Northeast Exploratory Committee Member
Via: U.S. Mail and e-mail to LPLBoard@lafayettepubliclibrary.org

Dear President Judge and fellow Board Members,

On behalf of Tulane Law School's First Amendment Clinic, we are writing to you regarding the removal of Lynette Mejia from her position on the Northeast Exploratory Committee. Ms. Mejia's removal violated her constitutional rights, as well as the Board of Control Bylaws.

Ms. Mejia is a committed Lafayette parish resident and has been a strong advocate for the library both before and since her appointment to the Northeast Exploratory Committee when it was formed last year. She has been an active and dependable member of the committee, never missing a meeting. For more than a year she has been involved in the Board of Control's meetings as well, keeping Lafayette citizens, whom the library system is intended to serve, abreast of internal operations and changes. As an engaged Lafayette resident, Ms. Mejia regularly exercises her constitutional rights to free speech and civic involvement.

Chairman Boudreaux removed Ms. Mejia from her committee appointment after an opinion editorial ("op-ed") that she authored was published by *The Current*. A copy of his e-mail, dated March 25, is attached hereto. The e-mail makes clear that Ms. Mejia's removal was a direct result of her published op-ed. It is a well-established legal principle that speech based on opinion is accorded first amendment protection, even if critical in tone. It is also well-established that retaliation against someone for free speech violates the Constitution. Ms. Mejia's removal unquestionably violates her first amendment rights, as it was retaliatory in intent.

In addition to violating the Constitution, Ms. Mejia's removal is also a flagrant violation of the Board of Control Bylaws. The Bylaws only allow for committee dissolution once the completion of the work for which they were appointed has been completed. Ms. Mejia's position was dissolved prior to the ad hoc committee receiving final approval on the Request for Proposal from the Lafayette Consolidated Government, further demonstrating that her removal was motivated by retaliatory intent.

As there is no legitimate basis for her removal other than retaliation for her free speech, we request Ms. Mejia's re-instatement to her position on the Northeast Exploratory Committee. In the event that she is not reinstated, the Board may face further legal action. Ms. Mejia is dedicated member of the Lafayette community, and we hope that she will continue to serve on the library committee while also participating in community debate and discourse.

Please contact me with further questions. I am available to speak with you or with LCG counsel once you have had opportunity to consider our letter.

Sincerely,



Katie Schwartzmann,
Director and Professor of the Practice
Tulane Law School First Amendment Law Clinic

CC: Board Member Robert Judge, President
Board Member Landon Boudreaux, Vice-President
Board Member Shane Landers, Mayor-President Appointee
Board Member Joan Wingate
Board Member Stephanie Armbruster
Board Member James Thomas
Board Member David Pitre
Danny Gillane, Library Director, Secretary