## **Statement of Gloria Allred**

Today I have filed a federal lawsuit in Atlanta, Georgia alleging that my constitutional rights and the rights of other Bill Cosby protesters were violated when I was denied entry to the Bill Cosby concert.

On May 2, 2015, I was in Atlanta, Georgia to speak at a Bill Cosby protest and to attend a Bill Cosby show which was scheduled to take place at the Cobb Energy Performing Arts Centre in Cobb County.

I was interested in attending Bill Cosby's performance in part to gain insight that would help me in the representation of many alleged victims of Bill Cosby whom I represented at that time. I did not intend to disrupt Mr. Cosby's show.

After I spoke at the protest, someone gave me a ticket to the show and I approached the theater. When I was near the main entrance, I was stopped by a Cobb County official who asked to see my government ID and my ticket. I presented my driver's license and my ticket. The official then checked a list, informed me I was on it and directed me to a side entrance away from the main entrance where other ticket holders were entering to see the show.

I entered the side entrance as directed and found myself in a room with two uniformed Cobb County police officers. One officer seated at a table informed me that he had "bad news" for me. He said that I was on a list and that I could not enter the theater.

When I asked why I could not enter, a Cobb County police officer explained that he had a "list," compiled by 'Outback Productions' or Bill Cosby representatives, of protestors who should not be allowed to view the Cosby Performance, and that my name appeared on the list. I explained that I did not plan to protest or disrupt the Cosby Performance and that I had a ticket for entry, but the police officer explained that those facts did not matter.

After the police officer explained to me that I was not permitted to enter the Centre that night, he instructed me to exit "the property" and that, if I refused to exit the property, I would be considered a "criminal trespass" and subject to arrest. At no point was I provided with notice or an opportunity to be heard before being placed on the Centre's do not admit for entry list.

When I asked whether any of the protestors outside who had a valid ticket could enter the Centre and view the Cosby Performance, the police officer explained that, even if someone had a ticket to the performance, if they were on the list, they (a) would be denied entry, and, (b) if they refused to leave, the Cobb County police department would treat them as trespassers.

I obeyed the police officer's instructions and left the Centre's property; I was unable to watch the Cosby Performance.

Later as we investigated how this denial of my rights happened, I was appalled to discover evidence that I had been placed on a police "security watch list", that police "intelligence" specifically reported on me by name and that a representative of Bill Cosby was communicating with police by email about what Cosby's representative called "agitators." As a result of these events, this morning I have filed a lawsuit in the U.S. District Court for the Northern District of Georgia, Atlanta Division against Cobb County, Georgia, Cobb-Murrieta Coliseum and Exhibit Hall Authority alleging that my First Amendment rights and due process rights and the rights of a number of other Bill Cosby protesters were violated when we were denied the right to view and listen to Mr. Cosby's performance without justification of explanation wholly on account of our viewpoints about Mr. Cosby.

I am seeking a court order which permanently enjoins the defendants from carrying out the Center's viewpoint based censorship admissions policy.

This case is important to all protesters in the future. Performers should not be able to commandeer a police force (as Bill Cosby's representatives appeared to do) in order to exclude individuals from the performance because they have a different viewpoint than the performer has.

Individuals who have tickets and who have committed no crime and who have not threatened to disrupt a performance must be admitted.

I am very thankful that Cary Wiggins who is a very prominent First Amendment lawyer in Georgia has agreed to represent me in this case. Mr. Wiggins is president of a national group of First Amendment lawyers and he has earned a well-deserved reputation for successfully litigating First Amendment cases. I am proud to be represented by him and to be able to stand up for the constitutional rights of protesters in Georgia.

> Gloria Allred Attorney at Law November 18, 2015