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STATE OF MINNESOTA | DISTRICT COURT

HENNEPIN COUNTY | FOURTH JUDICIAL DISTRICT

State of Minnesota,

Plaintiff,

vs.

Mohamed Noor,

Defendant.

File No. 27-CR-18-6859
The Honorable Kathryn L. Quaintance

MEMORANDUM IN SUPPORT OF MEDIA COALITION'S MOTION OBJECTING TO ORDERS THAT INTERFERE WITH FIRST AMENDMENT NEWSGATHERING AND REPORTING ACTIVITIES

Introduction

Star Tribune Media Company LLC, CBS Broadcasting Inc., Minnesota Public Radio, TEGNA Inc., and Fox/UTV Holdings, LLC (collectively, the "Media Coalition") submit this memorandum in support of their Motion Objecting to Orders that Interfere with First Amendment Newsgathering and Reporting Activities. Specifically, the Media Coalition objects to (1) the anticipated *de facto* closure of the courtroom when certain evidence—including, but not limited to, video footage and photographs—are permitted to be viewed only by the jury and other trial participants and not by the press and public, (2) any gag order barring the courtroom sketch artist from depicting trial participants or otherwise barring members of the press from reporting on what transpires during the trial and/or on statements trial participants make outside the courtroom.

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Argument

I. The Media Coalition has standing to assert its interest in access to this criminal trial and to prevent the imposition of a gag order.

The Supreme Court has recognized that "representatives of the press and general public 'must be given an opportunity to be heard on the question of their exclusion'" from criminal proceedings. *Globe Newspaper Co. v. Super. Ct.*, 457 U.S. 596, 609 n.25 (1982) (quoting *Gannett Co. v. DePasquale*, 443 U.S. 368, 401 (1979) (Powell, J., concurring)).

Likewise, with respect to prior restraints, courts recognize that journalists' First Amendment-protected interest in newsgathering gives them standing to challenge "gag" orders on third-parties who otherwise might provide information to them. *See Nw. Publ'ns, Inc. v. Anderson*, 259 N.W.2d 254, 256 (Minn. 1977); *State v. Clifford*, 41 Media L. Rep. 1273 (Minn. Dist. Ct. Oct. 3, 2012);[1] *see also Davis v. E. Baton Rouge Parish Sch. Bd.*, 78 F.3d 920, 926–27 (5th Cir. 1996); *Pansy v. Borough of Stroudsburg*, 23 F.3d 772, 777 (3d Cir. 1994); *In re Application of Dow Jones & Co.*, 842 F.2d 603, 608 (2d Cir. 1988); *Journal Publ'g Co. v. Mechem*, 801 F.2d 1233, 1235 (10th Cir. 1986); *Radio & Television News Ass'n v. U.S. Dist. Ct.*, 781 F.2d 1443, 1445 (9th Cir. 1986); *CBS Inc. v. Young*, 522 F.2d 234, 237–38 (6th Cir. 1975); *NBC v. Cooperman*, 501 N.Y.S.2d 405, 406 (App. Div. 1986) (per curiam).

Because the rules of criminal procedure have no analog to the civil rule governing intervention, a simple motion is the appropriate mechanism for the media to assert its interests. That said, some courts have extrapolated from civil rules and found that "a motion to intervene to assert the public's First Amendment right of access to criminal proceedings is proper." *See United States v. Aref*, 533 F.3d 72, 81 (2d Cir. 2008); *accord In re Associated Press*, 162 F.3d

[1] Court opinions not available through Lexis or Westlaw are attached to the Affidavit of Leita Walker.

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503, 508 (7th Cir. 1998); *United States v. Preate*, 91 F.3d 10, 12 n.1 (3d Cir. 1996); *United States v. Valenti*, 987 F.2d 708, 711 (11th Cir. 1993); *In re Search Warrant for Secretarial Area Outside Office of Gunn*, 855 F.2d 569, 572–73 (8th Cir. 1988). Should the Court choose to engage in such analysis, the requirements of Minn. R. Civ. P. 24.01,[2] governing intervention as of right, are easily satisfied here. There can be no doubt that the Media Coalition's objections are properly before this Court.

II. Excluding the press and public from viewing evidence presented to the jury and other trial participants violates the Constitutional and common law rights of press and public access to criminal proceedings.

Although they have seen no written order memorializing the Court's position, the Media Coalition understands that on March 29, 2019, the Court announced an intention to prevent members of the press and public sitting in the courtroom gallery and overflow courtroom from viewing body- and/or dash-camera footage recorded by Defendant Mohamed Noor, his partner, and other officers on the scene of the shooting of Justine Ruszczyk Damond. The Media Coalition also understands that the Court announced a similar limitation on press and public viewing of photographs from the medical examiner's office and that it stated that when this evidence is presented on electronic monitors, the monitors will be turned to face only trial participants so that spectators cannot see them. Star Tribune reported that, in issuing its ruling, the Court explained that "there's privacy interest involved" and that "[i]t's inflammatory

[2] Rule 24.01 states:

> Upon timely application anyone shall be permitted to intervene in an action when the applicant claims an interest relating to the property or transaction which is the subject of the action and the applicant is so situated that the disposition of the action may as a practical matter impair or impede the applicant's ability to protect that interest, unless the applicant's interest is adequately represented by existing parties.

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potentially. It's emotional and it shows the deceased in extremely compromising situations, and I don't see any value in that being shown outside the people directly involved in the case."[3]

As this Court is aware, this is a murder trial involving allegations that a Minneapolis police officer shot and killed an unarmed woman while on duty. It goes without saying that there is significant public interest in this case, both in Minnesota and around the world.[4] That high degree of interest counsels in favor of greater access to the trial, not less. However, the Court's order will prevent the public from seeing an important portion of the evidence against Mr. Noor, in violation of the First Amendment and the common law right of access to criminal trials.

The First Amendment provides an affirmative, enforceable right of public access to criminal trials. *Richmond Newspapers v. Virginia*, 448 U.S. 555, 580 (1980) ("We hold that the right to attend criminal trials is implicit in the guarantees of the First Amendment . . . ."); *see also Craig v. Harney*, 331 U.S. 367, 374 (1947) ("A trial is a public event. What transpires in the court room is public property."). As the Eighth Circuit has stated, "We have an open government, and secret trials are inimical to the spirit of a republic, especially when a citizen's liberty is at stake. The public, in a way, is necessarily a party to every criminal case." *United States v. Thunder*, 438 F.3d 866, 867 (8th Cir. 2006).

The reason is simple and Chief Justice Burger stated it elegantly: "People in an open society do not demand infallibility from their institutions, but it is difficult for them to accept

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[3] *See* Chao Xiong, *Police Body Camera Footage in Fired Minneapolis Officer's Murder Trial Will Not Be Shown to Public Gallery*, StarTribune.com (March 29, 2019), http://www.startribune.com/attorneys-judge-to-address-final-details-in-upcoming-noor-trial/507825992/.

[4] *See, e.g.*, Chao Xiong, *Former Minneapolis Officer Mohamed Noor's Trial Opens Monday Under Intense Scrutiny*, StarTribune.com (March 30, 2019), http://www.startribune.com/former-minneapolis-officer-s-trial-opens-monday-under-intense-scrutiny/507891361/; *Noor's Trial Will Be Closely Watched in U.S. and Australia*, KARE11.com (March 28, 2019), https://www.kare11.com/video/news/noors-trial-will-be-closely-watched-in-us-and-australia/89-7c483090-7aa7-473e-989e-ca245ad8302d.

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what they are prohibited from observing." *Richmond Newspapers*, 448 U.S. at 572. Over the years, courts have invoked similar sentiments and identified other interests the constitutional right of access protects.

One, of course, is that press and public access to judicial proceedings ensure they are conducted fairly:

> The purpose of the public trial guarantee is for the benefit of the accused; that the public may see he is fairly dealt with and not unjustly condemned, and that the presence of interested spectators may keep his triers keenly alive to a sense of their responsibility and to the importance of their functions.

State v. Brown, 815 N.W.2d 609, 616 (Minn. 2012) (internal marks and citations omitted); *see also Globe Newspaper*, 457 U.S. at 606 ("[I]n the broadest terms, public access to criminal trials permits the public to participate in and serve as a check upon the judicial process-an essential component in our structure of self-government"); *Richmond Newspapers*, 448 U.S. at 580 ("[W]ithout the freedom to attend such trials, which people have exercised for centuries, important aspects of freedom of speech and of the press could be eviscerated." (internal marks and citation omitted)).

Another is to ensure the public's *perception* that they are conducted fairly. As the Supreme Court put it thirty-five years ago:

> The value of openness lies in the fact that people not actually attending trials can have confidence that standards of fairness are being observed; the sure knowledge that *anyone* is free to attend gives assurance that established procedures are being followed and that deviations will become known. Openness thus enhances both the basic fairness of the criminal trial and the appearance of fairness so essential to public confidence in the system.

Press-Enter. Co. v. Super. Ct., 464 U.S. 501, 508 (1984) ("*Press-Enterprise I*"). Indeed, even when "scrupulously fair in reality," secret hearings are "suspect by nature. Public confidence cannot long be maintained where important judicial decisions are made behind closed doors and

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then announced in conclusive terms to the public, with the record supporting the court's decision sealed from public view." *Gannett*, 443 U.S. at 429 (Blackmun, J., concurring in part and dissenting in part) (citation omitted); *see also Neb. Press Ass'n v. Stuart*, 427 U.S. 539, 587 (1976) (Brennan, J., concurring) ("[s]ecrecy of judicial action can only breed ignorance and distrust of courts and suspicion concerning the competence and impartiality of judges").

Yet another reason the Constitution and common law guarantee press and public access to criminal courts is that the right of access provides an outlet for community hostility, educates the public about the judicial process, and fosters an informed electorate. *See, e.g.*, *Richmond Newspapers*, 448 U.S. at 592–93; *Globe Newspaper*, 457 U.S. at 604–05 (1982); *Press-Enterprise I*, 464 U.S. at 508–09.

All of these concerns apply to the closure contemplated here. Unless evidence presented to the jury can be viewed by the press and public sitting in the gallery *while that evidence is being discussed by trial participants*, then spectators will not be able to fully understand the evidence that has been presented to the jury for its consideration or how the jury may be reacting to it. It does not matter that the evidence may be available through some other channel at a later time, as discussed *infra*. There is a First Amendment interest in *contemporaneous* access. *Richmond Newspapers*, 448 U.S. at 592 (Brennan, J., concurring) (noting importance of "contemporaneous review in the forum of public opinion" as "an effective restraint on the possible abuse of judicial power" (citations omitted)). As the Second Circuit put it, "[t]he ability to see and to hear a proceeding as it unfolds is a vital component of the First Amendment right of access—not . . . an incremental benefit." *ABC v. Stewart*, 360 F.3d 90, 99 (2d Cir. 2004); *see also Detroit Free Press v. Ashcroft*, 303 F.3d 681, 710–11 (6th Cir. 2002) (explaining that "no subsequent measures [after closure] can cure this loss, because the information contained in the

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appeal or transcripts will be stale, and there is no assurance that they will completely detail the proceedings").

Thus, the strict standards that the First Amendment imposes before the right of access may be abridged apply here. It does not matter that the rest of the trial may be open. As a matter of state law, the same test applies, regardless of the extent of the closure imposed. *See State v. Mahkuk*, 736 N.W.2d 675, 684–85 (Minn. 2007); *see also Globe Newspaper*, 457 U.S. at 610 (rejecting closure just for testimony of victim of sexual assault); *Thunder*, 438 F.3d at 868 (same); *In re The Spokesman-Review*, 569 F. Supp. 2d 1095, 1105 (D. Idaho 2008) (rejecting closure for disturbing images); *People v. Holmes*, No. 12CR1522, slip. op. (Colo. Dist. Ct. Mar. 24, 2015) (same).

Although courts have articulated these standards with some variation, the constitutional right of access may properly be limited only where the party seeking closure satisfies four distinct requirements:

1. The party seeking to restrict access must demonstrate a *substantial probability* of prejudice to a *compelling interest*. *See, e.g.*, *Press-Enter. Co. v. Super. Ct.*, 478 U.S. 1, 13–14 (1986) ("*Press-Enterprise II*"); *Press-Enterprise I*, 464 U.S. at 510; *Richmond Newspapers*, 448 U.S. at 580–81.

2. The party seeking to restrict access must demonstrate that there is *no alternative* to adequately protect the threatened interest. *Press-Enterprise II*, 478 U.S. at 13–14; *Thunder*, 438 F.3d at 867–68.

3. Any restriction on access must be *narrowly tailored*. *See, e.g.*, *Press-Enterprise II*, 478 U.S. at 13–14; *Thunder*, 438 F.3d at 867–68.

4. Any restriction imposed on access must be *effective* in protecting the threatened interest for which the limitation is imposed—a constitutional right may not be restricted for a futile purpose. *See Press-Enterprise II*, 478 U.S. at 14.

Further, there are procedural requirements beyond these substantive ones: A court may not properly restrict public access without prior notice and without making findings of fact, on

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the record, demonstrating that these standards have been met. *See, e.g.*, *Press-Enterprise II*, 478 U.S. at 13–14; *Press-Enterprise I*, 464 U.S. at 510; *Thunder*, 438 F.3d at 867–68. Here, the requisite findings have not—and cannot—be made:

First, there has been no showing that allowing the public to view the video footage and photographs at issue would create a *substantial probability* of harm to a *compelling interest*. The Court expressed concern about a "privacy interest" and also expressed concern about the potentially inflammatory nature of the footage and images. The Media Coalition does not understand these concerns. Minnesota does not recognize a posthumous right to privacy. *See In re Nelson*, No. 27-FA-06-3597, slip op. at 12 (Henn. Cnty. Aug. 15, 2016) (concluding in a case involving the musician Prince that a cause of action for invasion of privacy does not generally survive an individual's death); *see also* Restatement (Second) of Torts § 652I cmt. b ("In the absence of statute, the action for the invasion of privacy cannot be maintained after the death of the individual whose privacy is invaded."). As for the risk of inflaming passions, evidence sometimes is kept from the jury to ensure the defendant's right to a fair trial. But here, the *jury will review the video and photographs regardless* and what the Court is prohibiting is press and public observations about what impact the evidence may have on their verdict.

Thus, other courts handling high-profile criminal trials have concluded that concerns similar to those articulated by this Court on Friday insufficient to prevent public access. For example, in *In re The Spokesman-Review*, the court concluded,

> Though the videos in question are disturbing, they are direct evidence of the crimes and are necessary to the jury's consideration and must be presented to the jury. The Court is sensitive to the family's interest in maintaining their privacy and the dignity of the victim. However, ours is an open judicial system that requires a compelling interest that outweighs the lengthy history of public access to open court proceedings. [S]uch interests that outweigh the public's right of access as to the videos have not been shown here.

569 F. Supp. 2d at 1105.

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Similarly, during the trial of James Holmes for the murder of twelve people at an Aurora, Colorado movie theater, the prosecution moved to prevent the gallery from being able to view autopsy and crime scene photographs and video footage containing images of homicide victims. *See Holmes*, No. 12CR1522, slip. op. The court rejected the request, ruling that "[t]he wishes of a deceased victim's relatives for privacy, while completely understandable, are not sufficient to warrant partial closure of the trial as graphic images of the deceased victims are displayed in the courtroom." *Id.* at 14–15; *see id.* at 23 ("As much as the court understands and respects the family members' desire for privacy, under the law, this is not a compelling and overriding interest that outweighs the defendant's constitutional right to a public trial or the public and the media's right of access to open proceedings."). The Court noted that its research unearthed no homicide case "in the rich history of American jurisprudence in which a trial court has granted the relief [the prosecution] requests here." *Id.* at 18.[5]

Second, there has been no showing that alternatives to closure will not adequately protect the interests at stake here. It is a standard practice to instruct jury members not to listen to or read news reports on the case they are considering, *see* 10 Minn. Prac., Jury Instr. Guides-Criminal CRIMJIG 1.02 (6th ed.). Delivering such an instruction here will prevent any possible influence from "inflammatory" reporting. With respect to Ms. Damond's family's privacy, the Court could, for example, make an announcement before the footage or photographs were shown so that those family members who wish to leave the courtroom can do so. *See, e.g.*, *Holmes*, slip op. at 4.

[5] While not addressing precisely this topic, Minnesota appellate courts have found similar justifications for closure lacking. For example, in *State v. Schmit*, 139 N.W.2d 800, 806 (Minn. 1966), the state Supreme Court found that "[m]ere embarrassment of adult witnesses with no showing of inability to testify is not a sufficient reason to defeat such an overbalancing constitutional right."

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Third, a blanket ban on public viewing of the footage and photographs while they are presented to the jury is not narrowly tailored. To the extent an order preventing public viewing of this evidence could ever be justified, the Court would be required to make a specific decision with regard to each piece of footage or photograph, and close the courtroom only for the limited time necessary to display that particular image or video.

Finally, closure *will* have significant negative impacts on the ability of the press and public to observe and report on how the video and photographic evidence is presented, how the jury reacts to it, and how the evidence might impact the jury's verdict. Closure will *not*, however, accomplish the Court's stated goals of protecting some undefined privacy right or preventing publicity regarding "inflammatory," "emotional" images. This is because under state law all "investigative data presented as evidence in court shall be public," Minn. Stat. 13.82, subd. 7. Thus, whether the press and public are permitted to view the evidence in question in court or not, state law requires it to be immediately available to them after it is presented to the jury pursuant to the Minnesota Government Data Practices Act.

For all of these reasons, the Media Coalition urges the Court to abstain from effectively closing the courtroom when certain video footage and photographs are presented to the jury and to refrain from conducting any other proceedings in *de facto* closed session unless and until the Media Coalition is given an opportunity to be heard on the matter and detailed findings of fact and conclusions of law are made on the public record.

III. Any order restraining the media from reporting on the trial, including any limitations imposed on the sketch artist, are presumptively unconstitutional and subject to the strictest scrutiny.

Based on reports coming out of proceedings last week, the Media Coalition believes that the Court may have some intent to limit the activities of the sketch artist at trial. Any such order would be a patently unconstitutional prior restraint, impermissibly gagging the artist and the

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artist's media clients from communicating truthful speech about the prosecution, which is unquestionably a matter of public interest.

"A gag order seeks to prevent publication before it happens and is, therefore, a prior restraint of speech." *Minn. Star & Tribune Co. v. Lee*, 353 N.W.2d 213, 214 (Minn. Ct. App. 1984). A prior restraint on speech constitutes "one of the most extraordinary remedies known to our jurisprudence" and is universally recognized to be "the most serious and the least tolerable infringement on First Amendment rights." *Neb. Press*, 427 U.S. at 559, 562. Every request for a prior restraint thus comes to a court with "a heavy presumption against its constitutional validity." *Bantam Books, Inc. v. Sullivan*, 372 U.S. 58, 70 (1963); *see also N.Y. Times Co. v. United States*, 403 U.S. 713, 714 (1971) (per curiam) (same).

In a long line of cases, the Supreme Court has held that "state action to punish the publication of truthful information seldom can satisfy constitutional standards." *Smith v. Daily Mail Publ'g Co.*, 443 U.S. 97, 102 (1979); *see also Fla. Star v. B.J.F.*, 491 U.S. 524, 541 (1989); *Okla. Publ'g Co. v. Dist. Ct.*, 430 U.S. 308, 311–12 (1977); *Cox Broad. Corp. v. Cohn*, 420 U.S. 469, 490–91 (1975). "[I]f a newspaper lawfully obtains truthful information about a matter of public significance then state officials may not constitutionally punish publication of the information, absent a need to further a state interest of the highest order." *Smith*, 443 U.S. at 103. This protection is at its highest when a prior restraint relates to reporting about criminal proceedings. *Neb. Press*, 427 U.S. at 559–60. As Justice Douglas held, "[t]hose who see and hear what transpired [at a trial] can report it with impunity. There is no special perquisite of the judiciary which enables it, as distinguished from other institutions of democratic government, to suppress, edit, or censor events which transpire in proceedings before it.'" *Craig*, 331 U.S. at 374. Therefore, "once a public hearing had been held, what transpired there [can] not be subject

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to prior restraint." *Neb. Press*, 427 U.S. at 568; *accord Estes v. Texas*, 381 U.S. 532, 589 (1965) (Harlan, J., concurring) ("Once beyond the confines of the courthouse, a news-gathering agency may publicize, within wide limits, what its representatives have heard and seen in the courtroom.").

One of the things the sketch artist is going to observe at the trial, along with everyone else in the gallery, are the trial participants—the judge, jury, the defendant, and the attorneys prosecuting and defending the case. Those in attendance, including the sketch artist, will also observe the families of Mr. Noor and Ms. Damond and everyone else in the courtroom. With regard to jurors, the gallery is going to see what they look like, how they react to certain testimony, and even whether they are paying attention. Those observations, lawfully obtained, can then be shared with anyone else outside of that courtroom, whether that sharing takes the form of written words or visual art.

In deciding whether to enter an order restraining speech, a court must consider (a) the gravity of the harm to be prevented; (b) whether other measures would be likely to mitigate the effects of unrestrained publicity; and (c) how effectively a restraining order would operate to prevent the threatened danger. *Neb. Press*, 427 U.S. at 562. Applying those factors here, it is clear that there has been an insufficient showing that a prior restraint is necessary.

Indeed, in *KPNX Broadcasting v. Superior Court*, 678 P.2d 431 (Ariz. 1984), the Supreme Court of Arizona applied these factors to precisely this issue—the trial court had required a sketch artist to submit his drawings of jury members for review before they were released for broadcast. The court found that none of *Nebraska Press*'s three prongs were met, let alone all three, and reversed the trial judge's order. *Id.* at 437; *see also KTTC Tele., Inc. v. Foley*, 7 Media Law Rep. 1094 (Minn. 1981) ("sketching should be allowed absent extraordinary

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circumstances where to do so would disrupt the proceedings or distract the participants"); *United States v. CBS, Inc.*, 497 F.2d 102, 102 (5th Cir. 1974) (finding complete bar on courtroom sketch artists unconstitutionally overbroad).

First, it found that the harm cited to justify the order—a "possibility of retribution and fear" for jurors' safety that could impact their verdict—was based on insufficient evidence. *KPNX Broad.*, 678 P.2d at 436–37. The court noted that very few members of the venire panel had expressed any such fear, and that none of those people were actually seated on the jury. Here too, "without the sketch order the harm posed by the coverage was less than grave." *Id.* at 437. Moreover, because no jury members had been selected at the time this Court reached its decision, any harm was purely speculative, and speculative harm is insufficient to justify a prior restraint. *See CBS, Inc. v. Davis*, 510 U.S. 1315, 1318 (1994) (Blackmun, J., in chambers).

Second, it found that other less restrictive measures could have protected the trial's fairness, such as voir dire to explore whether any jurors were actually in fear about being identified. *KPNX Broad.*, 678 P.2d at 437. A similar procedure could be used here and, given the amount of interest in this case, it seems likely voir dire will be extensive regardless.

Third, the court found that the order was ineffective to protect the identities of the jury members. *Id.* at 437. It noted that the trial was open to the public and "anyone desiring familiarity with jury names and faces had ample opportunity to do so by the simple device of attending the trial." *Id.* Here too, the trial will take place in a public courtroom for the world to see, as discussed above.

Like the Court in *KPNX Broadcasting*, the Media Coalition urges the Court to recognize that any prior restraint on the speech of the courtroom sketch artist would be unconstitutional and to withdraw any limitation to that effect.

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Conclusion

For the reasons stated above, the Court should reverse any order—oral or written—preventing the press and public from viewing certain photographic and videographic evidence shown to the jury and barring the courtroom sketch artist from depicting jury members and other trial participants.

Dated: April 2, 2019

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