

LIBERTY COUNSEL



Post Office Box 540774
Orlando, FL 32854-0774
Telephone: 800•671•1776
Facsimile: 407•875•0770
www.LC.org

122 C St. N.W., Ste. 360
Washington, DC 20005
Telephone: 202•289•1776
Facsimile: 202•216•9656

Post Office Box 11108
Lynchburg, VA 24506-1108
Telephone: 434•592•7000
Facsimile: 434•592•7700
liberty@LC.org

Reply to: Virginia

March 30, 2016

Via U.S. and Electronic Mail

Speaker Tim Moore
North Carolina
House of Representatives
16 W. Jones Street, Room 2304
Raleigh, NC 27601-1096
Tim.Moore@ncleg.net

President Pro Tempore Phil Berger
North Carolina Senate
16 W. Jones St., Rm 2007
Raleigh, NC 27601-1096
Phil.Berger@ncleg.net

RE: Liberty Counsel offer of assistance in defense of Public Facilities Privacy & Security Act

Dear Speaker Moore and President Berger:

Liberty Counsel was encouraged to see the resolve and fortitude of the North Carolina General Assembly and Governor McRory in enacting the Public Facilities Privacy & Security Act ("Act").

By means of this letter, Liberty Counsel hereby offers its services as a pro bono public interest law firm in defense of the Act, now that Attorney General Cooper has refused to defend it. Despite his unjustified refusal (which is a disturbing commentary on modern legal ethics, and potentially grounds for impeachment), Liberty Counsel is ready and able to provide that defense, should our assistance be desired.

As Founder and Chairman of Liberty Counsel, as well as former Professor of Law and Dean of Liberty University School of Law, I understand that the rule of law is critical to our survival as a people and a nation, and that the rule of law, and other cultural institutions are under attack. For these reasons, I am offering Liberty Counsel's resources to the service of the people of North Carolina. Moreover, the North Carolina legislature is and ought to remain the authority over matters of statewide import, such as nondiscrimination law, and should be commended for its swift defense of its citizens' safety and privacy rights in public facilities. Should you retain Liberty Counsel as outside

counsel, we will defend the Act at no cost to the taxpayers.

Founded in 1989, Liberty Counsel is a non-profit, constitutional litigation firm with offices in Lynchburg, Virginia; Orlando, Florida; and Washington, D.C. Liberty Counsel's practice is primarily federal. I have personally argued before the U.S. Supreme Court, and have filed many briefs before the High Court. Liberty Counsel is ready to provide a robust defense of the North Carolina legislature's interest in seeing the Act upheld, and in preserving the privacy and safety rights of its citizens from attack by those who would deconstruct gender. Liberty Counsel has the track record, litigation experience and the conviction necessary to prevail in that defense.

As time is of the essence, please feel free to contact me by phone or e-mail. I look forward to hearing from you soon.

Sincerely,



Mathew D. Staver[†]

MDS:jml

[†]Licensed in Florida and the District of Columbia