



STATE OF RHODE ISLAND

OFFICE OF THE ATTORNEY GENERAL

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Peter F. Neronha
Attorney General

January 6, 2026

Via Electronic Mail

Re: *Tuttle v. McKee*, 1:25-cv-00563

Dear Attorney Labinger and Attorney Deyoe,

As you know, our Office represents the defendants (Daniel J. McKee, Governor of the State of Rhode Island, in his official capacity; Matthew Sutton, Chief of the Rhode Island Capitol Police, in his official capacity; Marco Schiappa, Acting Director of the Division of Capital Asset Management and Maintenance, in his official capacity; and Colonel Darnell S. Weaver, Director of the Rhode Island Department of Public Safety, in his official capacity) in *Tuttle v. McKee*, 1:25-cv-00563. The purpose of this letter is to set out the State's plan for maintaining safety and security while providing public access to the Rhode Island State House Rotunda, and other portions of the State House, during the January 2026 State of the State Address (the "Access Plan").¹

Preserving the safety and security of all persons present in the State House during the January 2026 State of the State Address is of paramount concern. Consistent with standard security protocols, all persons entering the State House during the January 2026 State of the State Address will be subject to screening by the Capitol Police, including but not limited to the use of metal detectors. This Access Plan is also expressly premised upon the current best assessment by the Capitol Police and Rhode Island State Police of the relevant safety and security risks attendant to the January 2026 State of the State Address.

Under the Access Plan:

- Public Access shall be provided in the specific areas of the State House expressly denoted on the attached Floor Access Plans.
- Public Access to the Rotunda and the hallways of the First Floor of the State House shall be allowed, with the exception of a small portion of the Rotunda, a small portion of the stairs leading up to the Rotunda, and a small portion of the First Floor hallways that will be cordoned off so that invited guests and official attendees ("Attendees") of the January 2026 State of the State Address may ingress and egress to the House Chamber on the Second Floor. *See* First Floor Access Plan, attached; Second Floor Access Plan, attached. The extent of the Public Access and Attendees

¹ This Access Plan applies to the 2026 State of the State Address whenever it occurs, though it is currently expected to occur in January 2026.

Access areas shall be consistent with the areas indicated in the First Floor Access Plan. As reflected in the First Floor Access Plan, the stanchions traversing across the Rotunda shall be positioned up against the far side (Senate Chambers side) of the columns that are closest to the House Chamber, such that the columns themselves are within the Attendees access area, but the remaining portion of the Rotunda from the far side of the columns up to the top of the Rotunda stairs closest to the Senate-Chamber side is available for Public Access.

- Consistent with the First Floor Access Plan, members of the public who, due to mobility issues, need to use the elevators in order to reach the Public Access areas on the Second and Third Floors will be escorted through the cordoned-off Attendee Access areas to and from the elevators.
- Public Access will be allowed in the First Floor Bell Area. *See* First Floor Access Plan, attached.
- Public Access to the Second Floor will be provided in the portions of hallways 238 and 244 indicated in the Second Floor Access Plan.² As indicated on the Second Floor Access Plan, this area is intended to be used as a Wheelchair / Mobility Impairment Access area by members of the public who would have difficulty accessing the Rotunda due to their use of wheelchairs or other mobility impairments.³ Those members of the public who need access to this area will be escorted through the cordoned-off Attendee Access area to and from the elevators.
- Additionally, members of the public who, due to mobility issues, wish to reach the portions of the public accessible Rotunda stairway leading up to hallway 244 by climbing down those stairs from hallway 244 may also do so by being escorted to the elevators and through hallways 238 and 244 and through the stanchion at the top of the Rotunda stairway. Members of the public will not be allowed to congregate in the portion of hallway 244 directly above at the top of the Rotunda stairway.
- Public Access to the hallways of the Third Floor of the State House shall be allowed in the areas denoted on the Third Floor Access Plan. *See* Third Floor Access Plan, attached.

This Access Plan is subject to change if the Capitol Police and Rhode Island State Police determine that it is necessary to respond to currently unknown exigent circumstances that might affect the

² This Access Plan is not intended to specifically address media access, but in general, credentialed media will be permitted on the Second Floor in a manner consistent with prior State of the State addresses.

³ “Wheelchair / Mobility Impairment Access” notations in the attached access plans denote areas for those in wheelchairs, others with a mobility impairment adversely impacting the use of stairs, and their assistants, if any.

safety or security of the January 2026 State of the State Address by restricting or otherwise modifying public access to any area within the State House.

This Access Plan does not constitute a waiver or alteration of any generally applicable statutes, regulations, policies, or practices governing the normal operations and use of the State House by members of the public, including any and all statutes, regulations, policies, or practices concerning noise levels and the disturbance or disruption of normal governmental activities. *See, e.g.*, Rhode Island General Laws § 37-8-10; Division of Capital Asset Management and Maintenance – Use of State House Grounds Policy – 2023, available at https://rigov-policies.s3.amazonaws.com/DCAMM_Use_Of_State_House_Grounds.pdf.

This Access Plan does not constitute an admission of liability or a waiver by the State Defendants of any arguments or defenses to any of your clients' claims and requests for relief in *Tuttle v. McKee*, 1:25-cv-00563.

Sincerely,

/s/ Katherine Connolly Sadeck

/s/ Jeff Kidd

Katherine Connolly Sadeck

Assistant Attorney General

Jeff Kidd

Special Assistant Attorney General

cc: Claire Richards, Esq.; Andrea Shea, Esq; Adam Sholes, Esq; Mary-Rose Pellegrino, Esq.