

**IN THE SUPERIOR COURT OF DEKALB COUNTY
STATE OF GEORGIA**

Georgia Division, Sons of Confederate Veterans, Inc; Confederate Memorial Camp #1432 of the Sons of Confederate Veterans;

Case No.: 25CV6288

Philip J. Autrey, John F. Muerlin,

Timothy F. Pilgrim and Barbara W. Smith

Plaintiff

VS

The State of Georgia

Defendant

SUMMONS

TO THE ABOVE NAMED DEFENDANT(S):

You are hereby summoned and required to file electronically with the Clerk of said court at <https://efilega.tylerhost.net/ofswab> and serve upon the Plaintiff's attorney, whose name, address and email is:

An answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 1st day of July, 2025.

Honorable Debra DeBerry
Clerk of Superior Court

By /s/ Elizabeth Dagostino
Deputy Clerk

E-Filing and E-Service

Pursuant to the Superior Court of DeKalb County's E-File Order, dated December 27, 2016, and available at www.dksuperiorclerk.com/civil, the parties must file all documents electronically through eFileGA unless expressly exempted under the Rule. All orders and notices from the Court will be electronically filed and served through eFileGA. The parties must register for an eFileGA account, link their service contact information with the case and the party represent, and take whatever steps are necessary to ensure that correspondence from eFileGA reaches the parties' inboxes. To access eFileGA, please go to <http://www.odyssevefilega.com/>

IN THE SUPERIOR COURT FOR THE COUNTY OF DEKALB
STATE OF GEORGIA

GEORGIA DIVISION, SONS OF)	
CONFEDERATE VETERANS, INC.;)	
CONFEDERATE MEMORIAL)	CIVIL ACTION
CAMP #1432 OF THE SONS OF)	
CONFEDERATE VETERANS;)	FILE NO.: 25CV6288
PHILIP J. AUTREY; JOHN F.)	
MUERLIN; TIMOTHY F. PILGRIM)	
and BARBARA W. SMITH,)	
)	
Petitioners,)	
)	
vs.)	
)	
THE STATE OF GEORGIA,)	
)	
Respondent.)	

PETITION FOR WRIT OF INJUNCTION

COME NOW the above Petitioners, by and through their undersigned attorney, and petition the Court to issue a writ of injunction, directing Respondent The State of Georgia, (acting through its lawful authority, the Stone Mountain Memorial Association, hereinafter referred to as the "SMMA") to comply with its official duties as set forth in O.C.G.A. § 50-3-1 and O.C.G.A. § 12-3-190 *et seq.*

Jurisdiction and Venue

1.

The Stone Mountain Memorial Association ("SMMA") is an authority of the State of Georgia created by the General Assembly to preserve and manage Stone Mountain Park. *See* O.C.G.A. § 12-3-192.1.

2.

This Court has jurisdiction over this Petition for Writ of Injunction as it concerns the failure of the State of Georgia, acting through its Authority, the SMMA to perform its duty under O.C.G.A. § 50-3-1 and O.C.G.A. § 12-3-190 *et seq.*

3.

Venue is proper pursuant to O.C.G.A. § 12-3-220, providing that “[a]ny action to declare, protect, or enforce any rights or duties under this part, brought in the courts of the state, shall be brought in the Superior Court of DeKalb County, Georgia. . . .”

4.

Venue is proper pursuant to O.C.G.A. § 50-3-1(b)(5) and other applicable laws.

The Parties

5.

Petitioner Georgia Division, Sons of Confederate Veterans, Inc. (SCV) is a domestic non-profit corporation organized under the laws of the State of Georgia and is active in the preservation and protection of historical monuments and memorials in throughout the state, including but not limited to DeKalb County, Georgia. Numerous members of Petitioner SCV reside in DeKalb County, Georgia. Petitioner SCV appears in a representational capacity for its members who are residents of DeKalb County, Georgia as well as the State of Georgia at large. Petitioner SCV, representing its members who are community stakeholders in DeKalb County, Georgia as well as the State of Georgia at large, has associational standing to bring this action against the State of Georgia.

6.

Petitioner SCV has standing to bring this Petition pursuant to O.C.G.A. §§ 14-3-302(1) and 50-3-1(b)(5).

7.

Petitioner SCV has used the Stone Mountain Memorial Park for various activities including Confederate Memorial services for years.

8.

Petitioner Confederate Memorial Camp #1432 of the Sons of Confederate Veterans (“Camp #1432”) is a sub-unit of Petitioner SCV and is active in the preservation and protection of historical monuments and memorials in DeKalb County, Georgia. Camp #1432 is the local camp of the Sons of Confederate Veterans, which was chartered in DeKalb County, Georgia, on November 19, 1984 and has operated continuously in DeKalb County, Georgia, since that time. Numerous members of Camp #1432 reside in DeKalb County, Georgia. Camp #1432 appears in a representational capacity for its members who are residents of DeKalb County, Georgia as well as the State of Georgia at large. Camp #1432, being a community stakeholder in DeKalb County, Georgia, and representing its members who are community stakeholders in DeKalb County, Georgia, has organizational and associational standing to bring this action against the State of Georgia.

9.

Camp #1432 and its members conduct regular meetings in DeKalb County, Georgia, and have participated in activities at the Stone Mountain Memorial Park.

10.

Both the SCV and Camp #1432 have members that include voters, citizens, residents, and taxpayers of the State of Georgia generally and DeKalb County, Georgia, specifically, who would otherwise have standing to pursue this action in their own right against the State of Georgia.

11.

The interests that the SCV and Camp #1432 seek to protect in this action, *i.e.*, the State's fulfillment of its legal duty to follow the law as set forth in O.C.G.A. § 50-3-1 and O.C.G.A. § 12-3-191 *et seq.*, is germane to the purpose of both the SCV and Camp #1432 and provides each with associational standing in this action.

12.

Petitioners Philip J. Autrey and John F. Murlin are members of the SCV and Camp #1432, and are voters, citizens, residents, and taxpayers of DeKalb County, Georgia.

13.

As voters, citizens, residents, and taxpayers of DeKalb County, Georgia, and members of SCV and Camp #1432, Petitioners Philip J. Autrey and John F. Murlin are community stakeholders in DeKalb County, Georgia; are owed duties by the State of Georgia, which is an adverse party with interests antagonistic to those of Petitioners Philip J. Autrey and John F. Murlin; will be injured by the State of Georgia's violations of those duties; have rights at stake that require adjudication for their protection; and, therefore, have lawful standing to pursue this action.

14.

Petitioner Timothy F. Pilgrim is a member of the SCV and a voter, citizen, resident, and taxpayer of Cobb County, Georgia.

15.

As a voter, citizen, resident, and taxpayer of Cobb County, Georgia and member of the SCV Petitioner Timothy F. Pilgrim has lawful standing and interest to pursue this action against the State of Georgia.

16.

Petitioner Barbara W. Smith is a voter, citizen, resident, and taxpayer of Camden County, Georgia.

17.

As a voter, citizen, resident, and taxpayer of Camden County, Georgia Petitioner Barbara W. Smith has lawful standing and interest to pursue this action against the State of Georgia.

18.

Pursuant to O.C.G.A. § 12-3-192, SMMA is “a body corporate and politic and instrumentality and public corporation” of the State of Georgia. O.C.G.A. § 50-16-3.1 further defines SMMA as a “state authority.”

19.

Pursuant to O.C.G.A. § 12-3-192, the State of Georgia through the SMMA “may contract and be contracted with, sue and be sued, implead and be impleaded, and complain and defend in all courts.”

20.

As all Petitioners are entities organized and active under the laws of the State of Georgia and/or are voters, citizens, residents, and taxpayers in the State of Georgia, all Petitioners are community stakeholders interested in having the laws of the State executed, and public rights enforced.

21.

The State of Georgia, which includes SMMA in its capacity as a state authority, owes a continuing, constant, and public duty to its community stakeholders to follow the law.

22.

Community stakeholders, including but not limited to Petitioners, are injured when governments and government entities violate their legal duty to follow the law.

O.C.G.A. § 50-3-1

23.

O.C.G.A. § 50-3-1(b)(1)(B) defines “monument,” which includes

a “... display, or memorial constructed and located with the intent of being permanently displayed and perpetually maintained that is: (i) [d]edicated to a historical entity or historically significant military, civil, political, social, or cultural events or series of events; or (ii) [d]edicated to, honors, or recounts the military service of any past . . . military personnel of this state; . . . or the Confederate States of American or the several states thereof.”

24.

O.C.G.A. § 50-3-1(b)(2) provides in part that “[n]o officer or agency shall remove or conceal from display any such monument for the purpose of preventing the visible display of the same.”

25.

O.C.G.A. § 50-3-1(b)(3) provides in part that

“[n]o publicly owned monument erected, constructed, created, or maintained on the public property of this state or its . . . authorities . . . or on real property owned by an agency of the State of Georgia shall be relocated, removed, concealed, obscured, or altered in any fashion”

O.C.G.A. § 12-3-190 et seq.

26.

The “Stone Mountain Memorial Association Act” is set forth at O.C.G.A. § 12-3-190, *et seq.*

27.

Pursuant to O.C.G.A. § 12-3-192.1(3), one of the stated purposes of the State of Georgia’s authority, the SMMA, is “[t]o maintain an appropriate and suitable memorial for the Confederacy.”

28.

O.C.G.A. § 12-3-194(6) grants the State of Georgia, acting through the SMMA, the power to, *inter alia*, “develop, improve, maintain, equip, manage, and operate the project as defined in Code Section 12-3-191. . . .”

29.

O.C.G.A. § 12-3-194(12) grants the State of Georgia operating through the SMMA the power “[t]o do and perform all things necessary or convenient to carry out the powers conferred upon the association.”

30.

O.C.G.A. § 12-3-191(7) defines the “[p]roject” as

“Stone Mountain and property adjacent thereto acquired by the association . . . and all property, real, personal, or mixed, used or useful . . . in . . . maintaining, managing, and operating Stone Mountain . . . as a *Confederate memorial* and public recreational area. . . . [Emphasis added.]”

31.

O.C.G.A. § 12-3-194.1(d) provides that the State of Georgia, operating through

“the Stone Mountain Memorial Association shall continue the practice of stocking, restocking, and sales of *confederate* memorabilia. [Emphasis added.]”

32.

The fact that the General Assembly went so far as to *require* that SMMA sell confederate memorabilia underscores the legislative intention that Stone Mountain be maintained as “an appropriate and suitable memorial for the *Confederacy*.” [Emphasis added.]

The Warner Museums Revisions

33.

In the 1960’s, during the Centennial commemoration of the War for Southern Independence, *Memorial Hall* was created in front of *Memorial Lawn* overlooked by the *Confederate Memorial Carving*.

34.

The Memorial Hall constitutes a “monument” as defined by O.C.G.A. § 50-3-1(b)(1)(B).

35.

The Memorial Hall, as originally designed and constructed, is consistent with the General Assembly’s stated intention expressed in O.C.G.A. § 12-3-191(7) that Stone

Mountain be “maintain[ed], manag[ed], and operat[ed] . . . as a *Confederate memorial*,” and for which purpose SMMA was created as set forth in O.C.G.A. § 12-3-192.1(3) [Emphasis added].

36.

The State of Georgia, acting through the Stone Mountain Memorial Association has obtained bonds in the reported amount of approximately \$11 million dollars (\$11,000,000.00) to renovate, among other things, the Memorial Hall.

37.

The State of Georgia, acting through the Stone Mountain Memorial Association has contracted with the Warner Museums, a division of Culton Companies, Inc., to radically revise the displays presently at Memorial Hall completely changing the emphasis of the Park and its purpose as defined by the law of the State of Georgia.

38.

On its website, Warner Museums boast that it will be a “truth-telling museum.”

39.

In press coverage in the *Atlanta Journal Constitution* (November 14, 2022) Warner is referred to as responsible for a “‘truth-telling’ museum exhibit planned at Stone Mountain Park.”

40.

In no place on its website or its brochures does Warner indicate it will uphold the legislative mandate and operate a Confederate memorial.

41.

Warner's proposed actions are clearly outside of the legislative mandate and legal responsibilities of the State of Georgia acting through the Stone Mountain Memorial Association.

42.

In its literature boasting of its intentions, the Warner Museums' plan states:

Since the early nineteenth century, various collective memories have been created that attempt to define the country's numerous national identities. These memories, in general, are a product of both perceived and real threats inherent in the market realities created by capitalism. [Emphasis added.]

(The complete Warner brochure is attached as Exhibit "A.")

43.

This is outside of the legislative mandate and legal responsibilities of the State of Georgia acting through the Stone Mountain Memorial Association.

44.

The Warner brochure further states:

The interpretive themes developed for Stone Mountain will explore how the collective memory created by Southerners in response to the real and imagined threats to the very foundation of Southern society, the institution of slavery, by westward expansion, a destructive war, and eventual military defeat, was fertile ground for the development of the Lost Cause movement amidst the social and economic disruptions that followed. Using various interpretive methods, techniques, media, and public engagement, while employing the most current scholarship, we seek to create an exhibit not just about the past but about the future and place this vanquished history has in our national discourse. [Emphasis added.]

45.

This is clearly outside of the legislative mandate and legal responsibilities of the State of Georgia acting through the Stone Mountain Memorial Association.

46.

Warner states that it intends to “contextualize” the antebellum period to show how the South caused fear in the North.

“This exhibit will contextualize and define for visitors how the country became disunited over the issue of slavery in the decades between the end of the War of 1812 and the outbreak of the Civil War in 1861. Before the conflict slavery and its products, such as cotton, generated national wealth in both sections of the country. However, the very potency (political and economic) of the slave-owning system began to create fear in the non-slave-owning states.”

47.

This is clearly outside of the legislative mandate and legal responsibilities of the State of Georgia acting through the Stone Mountain Memorial Association.

48.

Warner also plans to give the Union soldiers considerable attention in this memorial to the Confederacy while criticizing the North for not giving adequate attention to the 7% of the Union army which was comprised of African Americans.

49.

This is clearly outside of the legislative mandate and legal responsibilities of the State of Georgia acting through the Stone Mountain Memorial Association.

50.

Warner proposes to make a major portion of the new exhibit deal with Reconstruction, the Ku Klux Klan, and the trauma of the post-War period from the perspective of the former slaves.

51.

This is clearly outside of the legislative mandate and legal responsibilities of the State of Georgia acting through the Stone Mountain Memorial Association.

52.

A specific attack is made upon the United Daughters of the Confederacy and the Sons of Confederate Veterans in the Warner's proposed exhibit:

Though defeated, they refused to acknowledge they had been on the wrong side of the nation's divine history and should be recognized once more as an integral part of another emerging collective memory - the American military tradition - being brought to bear against the enemies of westward expansion - specifically Native Americans. In the 1890s, organizations like the United Daughters of the Confederacy and the Sons of Confederate Veterans materialized as promoters of Lost Cause ideology, using the Lost Cause memory of the war to build monuments and veterans' homes, support Confederate-based education initiatives, encouraged federal and state-mandated racial segregation and the disfranchisement of African Americans.

53.

This is clearly outside of the legislative mandate and legal responsibilities of the State of Georgia acting through the Stone Mountain Memorial Association.

54.

Another portion of the revisionist exhibit will be a section dedicated to "Shermantown." Shermantown, named for a gentleman not unknown for his activities in Georgia in 1864, is a residential community primarily composed of African Americans in the city of Stone Mountain, Georgia and completely unrelated to a memorial for the Confederacy.

55.

This is clearly outside of the legislative mandate and legal responsibilities of the State of Georgia acting through the Stone Mountain Memorial Association.

56.

The Civil Rights movement will get major attention in the post-World War II exhibit section attributing the revival of the impetus to complete the Confederate Memorial carving to opposition to the Civil Rights movement and ignoring the fact that the Centennial of the Civil War was very much on the national consciousness.

57.

This is clearly outside of the legislative mandate and legal responsibilities of the State of Georgia acting through the Stone Mountain Memorial Association.

58.

The concluding paragraph of the plan talks about the need to embrace diverse visions for the future as opposed to memorializing the Confederacy.

59.

This is clearly outside of the legislative mandate and legal responsibilities of the State of Georgia acting through the Stone Mountain Memorial Association.

60.

Finally, as a supplement to the plan is the following Warner Museums' proposal:

ADDITIONAL INTERPRETIVE RECOMMENDATIONS:

Exterior Terrace - "I Have a Dream" Sculpture Garden

In addition to the galleries in Memorial Hall, we propose as an additional interpretive asset that involves expanding the terrace just outside the first-floor gallery to create a sculpture garden that extends into portions of the memorial lawn. The garden will feature historic African American characters who fought for social justice and whose work reached the entire nation. In the center is a sculpture of Martin Luther King, Jr., standing on Stone Mountain granite steps, not unlike the Lincoln Memorial, with Jackie Robinson, Andrew Young, John Lewis, and Julian Bond close by. The intent is to symbolically recreate King's "I Have a Dream" speech where he references Stone Mountain. All the supporting characters are considered Georgians and were at the March on Washington, with Lewis also speaking.

Other statues of significant Georgia Civil Rights leaders in the garden include Walter White, Benjamin Mays, Grace Towns Hamilton, Bernice Johnson, Hosea Williams, Julian Bond, Vernon Jordan, and Charlayne Hunter. The garden is juxtaposed with the Stone Mountain bas-relief of David [sic?], Lee, and Jackson. The experience will allow visitors to walk among these sculptures and learn about their contributions.

61.

This is clearly outside of the legislative mandate and legal responsibilities of the State of Georgia acting through the Stone Mountain Memorial Association.

62.

It is the manifest intention of the designers of the Warner Museums' exhibit completely repurpose the Stone Mountain Memorial Park and to utterly ignore the purpose of the Georgia legislature in creating and maintaining the Stone Mountain Memorial Park.

63.

Not a single proposal of Warners Museums' plans in any respect upholds the Georgia code, in particular O.C.G.A. § 50-3-1 and O.C.G.A. § 12-3-191 *et seq.*

64.

The State of Georgia, (acting through its authority SMMA's) acceptance of the highly partisan and hostile proposed revisions of Memorial Hall constitutes a clear violation of its duty to follow State law and perform its public duty as set forth in O.C.G.A. § 50-3-1 (monument relocation/concealment and honoring the "bravery and heroism of the citizens of the state...") and O.C.G.A. § 12-3-190 *et seq.* (maintaining Stone Mountain as an appropriate and suitable memorial for the Confederacy).

65.

To the extent that the State of Georgia, its authority the SMMA and its officers had any statutory discretion regarding the treatment of Memorial Hall, their actions were arbitrary and capricious and constituted—and continue to constitute—a gross abuse of that discretion being in complete and flagrant violation of Georgia law.

66.

“Where the question is one of public right and the object is to procure the enforcement of a public duty, no legal or special interest need be shown, but it shall be sufficient that a plaintiff is interested in having the laws executed and the duty in question enforced.” O.C.G.A. § 9-6-24.

67.

Petitioners have a clear legal right to have the laws of the State executed, and to have the State’s duty to follow the laws enforced.

68.

The State of Georgia’s duty affects all the people of Georgia at large, and not just Petitioners. *Adams v. Ga. Dep’t of Corr.*, 274 Ga. 461, 462 (2001) (stating that a public duty is “one which affects the general public rather than a private individual”).

69.

Petitioners show that the removal of the exhibits from Heritage Hall and the replacement of those exhibits with displays which merely do not honor the Confederacy but assault its memory and, in many cases, have no connection with the Confederacy is a continuing violation of Georgia law.

70.

By letter dated October 9, 2023, Petitioners made demand on the State of Georgia through the Georgia Department of Administrative Services to rectify its violation of O.C.G.A. § 50-3-1 and O.C.G.A. § 12-3-191 *et seq.* A copy is attached hereto as Exhibit “B”.

71.

The Department responded on November 28, 2023 promising an investigation into the claims. No further response was had. A copy is attached hereto as Exhibit "C."

72.

A final letter was sent to the State of Georgia through the Georgia Administrative Services dated September 6, 2024. No response to this letter was received. A copy is attached hereto as Exhibit "D."

73.

The State of Georgia acting through its Authority the SMMA has failed and refused to rectify its violations, and these violations remain ongoing and continuing as of the time of the filing of this Petition.

74.

Petitioners and the people of Georgia at large have been irreparably damaged by SMMA's continuing violation of its legal duty to follow the law.

CAUSE OF ACTION

Writ of Injunction Against the State of Georgia
O.C.G.A. § 9-5-1 *et seq.*

75.

Petitioners adopt and incorporate the foregoing Paragraphs 1 through 74 as though fully set forth herein.

76.

The State of Georgia's Warner plan to completely remake the museum exhibits at the Stone Mountain Memorial Park is in the nature of a continuing trespass that is illegal and contrary to good conscience, and Petitioners have no adequate remedy at law.

77.

The State of Georgia's Warner plan is completely contrary to the purposes of the Georgia law for the Stone Mountain Memorial Park as designed by the people of Georgia through their representatives.

PRAYER FOR RELIEF

WHEREFORE, Petitioners respectfully request that this Honorable Court grant relief as follows:

- A. Upon hearing the Petitioners pray this Honorable Court that a mandatory and permanent injunction issue pursuant to O.C.G.A. § 9-5-1 *et seq.*, requiring the State of Georgia acting through its Authority the Stone Mountain Memorial Association to stay the installation of any exhibits at the Stone Mountain Memorial Park in the violation of the Georgia law or that this Honorable Court order the removal, if already installed, all exhibits utterly and intentionally hostile to the statutory purpose of honoring the Confederacy and the citizens of this state who suffered and died in their cause; and
- B. That this Honorable Court Order the State of Georgia, acting through its Authority the Stone Mountain Memorial Association, restore the stay of installation, or removal if already installed, all exhibits irrelevant to the legislative

mandate of the Stone Mountain Memorial Association to honor the Confederacy and the citizens of this state who suffered and died in their cause ; and

- C. That this Honorable Court order the State of Georgia, acting through its Authority the Stone Mountain Memorial Association, restore or add such appropriate exhibits to Memorial Hall to meet the legislative mandate to honor the Confederacy and the citizens of this state who suffered and died in their cause.
- D. Award Petitioners their reasonable attorney's fees and costs in this action pursuant to O.C.G.A. § 13-6-11 and O.C.G.A. § 50-3-1(b)(3); and
- E. Grant Petitioners such other and further relief as this Court deems just and proper.

This the 1st day of July, 2025.

Respectfully submitted,

GEORGIA DIVISION, SONS OF CONFEDERATE VETERANS, INC.; THE CONFEDERATE MEMORIAL CAMP #1432 OF THE SONS OF CONFEDERATE VETERANS; PHILIP J. AUTREY, JOHN F. MURLIN, TIMOTHY F. PILGRIM and BARBARA W. SMITH.

THE LAW OFFICES OF
BLAKE A. POOLE, LLC.

Blake A Poole

Blake A. Poole
State Bar No. 606771
Attorney for Petitioners



A DIVISION OF CULTON COMPANIES, INC.

MUSEUM DESIGN BUILD

PRESENTED TO
STONE MOUNTAIN MEMORIAL ASSOCIATION



CONTACT

Address

3401 Mary Taylor Road
Birmingham, AL 35235



Phone

888.883.8087
205.439.8200



Online

WarnerMuseums.com
Info@warnermuseums.com

EXHIBIT

"A"

EXECUTIVE SUMMARY

Warner Museums is the premiere, trusted museum design partner from strategy through sustainability. By integrating expert planning, design, technology, fabrication and execution under one roof, exhibition projects from 1,500 to 150,000 square feet can be delivered to exceptional standards of innovation and quality on time and within budget.

We believe that authentic stories and dimensional, multi-sensory experiences – the core strength of museums and exhibitions – have unmatched power to forge genuine human connections. Warner Museums projects are bold and inspiring, blending an immense range of interpretive and interactive modes that help transform how visitors think and feel about their world and themselves.

We are optimistic about the future of museums. We view the rise of digital media as an asset, not as competition. We believe strongly in the power of well-designed exhibits to help strengthen social bonds between visitors, the institution, and the communities they serve.

Museums excel when they combine the spark of intellectual excitement with the resonance of genuine human emotion. Warner Museums excels by combining popular and accessible interpretive techniques within rich multi-sensory environments and immersive media to elicit lasting meaning for visitors of all ages and interests.

WHAT WE DO

We build the projects we design, under one roof, which allows us to take advantage of advanced fabrication techniques and avoid the unexpected pitfalls that may hamper a typical program. This has afforded us a unique position in the field that can only be achieved through experience.

We achieve the highest possible production standards by emphasizing quality-control procedures at every stage of the production process. This allows us to build exhibits cost-effectively, with less risk and greater durability. From virtual to in-person experiences, we are a multifaceted agency with capabilities from conceptual and design to multimedia production and fabrication.

PROJECT LEAD

Alan Sims
Area President

O: 615-953-2547

C: 205-242-6580

alan@cultoncompanies.com

LEADERSHIP

Jeff Culton, CEO
Robert Donovan, President

GLOBAL REACH

Serving customers in all
50 states & internationally

FOUNDED

1970

REFERENCES

HERE

LOCATIONS



Birmingham,
Alabama



Huntsville,
Alabama



Nashville,
Tennessee



+ STRATEGY AND PLANNING

Our planning services include architectural programming and assessment, interpretive frameworks and development, exhibition concepts, cost and feasibility analysis, marketing, and other key strategic functions that enable emerging museums to take the next logical step, and existing institutions to renew their missions and experiences. We transform ideas into stories, solutions, and strategy.

+ CONTENT

From concept development through final design, our content experts conduct research, liaise with your experts, build a solid messaging structure, write exhibition copy, and ensure that all design choices are rooted in the content and messaging of the project. We create content that connects with people from all walks of life.

+ DESIGN

We provide a full spectrum of interpretive development and design services for museum exhibitions, including content research, writing, AV integration and more. We also provide graphic design, themed environmental design, interactive, and media. This versatility is matched by generous flexibility, coordinating our skills with a museum's in-house capabilities.

+ GRAPHICS

We're hyper-focused on the quality of what we produce and pride ourselves on being experts at navigating material selection, durability, and best printing methods. By rooting our designs in reality, we present our clients with solutions that we are capable of creating in-house, and therefore our execution matches the client's expectations.

+ PROJECT MANAGEMENT

Members of our dedicated project management team become your main point of contact, coordinating closely with your own project managers in order to ensure that budgets and schedules are respected over the course of the project overall, as well as from phase to phase.

+ SENSORIAL

Adding sensory effects in a museum setting truly provides a more comprehensive experience. Warner Museum continues to be on the cutting edge of sensorial technology, working closely with museums, historical and educational facilities to create custom solutions to provide unique and compelling exhibits.

+ TECHNICAL

Our technical team—with their fingers on the pulse of technological evolution—conceive, prototype, source, build, test, and debug all technical requirements for the project, including hardware and software, new technologies, base building requirements, and media of all types.

+ INSTALLATION & DELIVERY

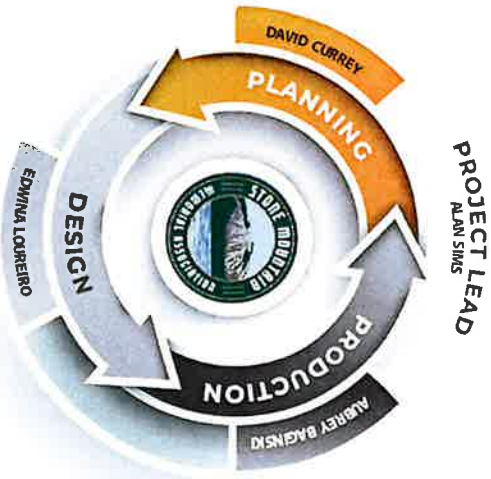
We make sure that every item is installed so that it's safe, durable, and meets the expectations of the design to the demanding specifications museums have. We always ensure respect for the building, the schedule, and our clients' time. Once a project has been fully staged at our facility for final fit and finish adjustments, the components are disassembled and relocated to their final location.

OUR PROCESS

The unique approach that Warner Museums brings is one that utilizes our vertically integrated development and production model in taking the initial concepts all the way through design development, fabrication, delivery and installation. The ability to control and execute design ideas as part of the building process has proven to be a singular characteristic of our work that enables our design team to dream bigger and reach farther with our projects. Quality control with our projects speaks to a number of unique relationships within each department allowing designers to stay involved through the engineering and fabrication of the displays as well as taking a significant role in the final installation and inspection of each project. This environment has proven to be a luxury for both the client and the design and production staff affording us the ability to ensure that our own high expectations are met at the end of each project.

Our interpretive process is circular in nature, as it requires a constant reference to the educational message at its core. As the circle grows outward, much like the rings on a tree, the tools needed to best interpret the message become embedded and part of the growth. Warner Museums is 150,000 square feet of content, design and production under one roof. We are experienced at bringing in the specialty advisors and contributors that will make each place a unique destination. Our awareness & ability to bring in and integrate additional specific project-based talent is a testimony to our desire to provide the best solution for our customers.

Within the innermost core, Warner Museums' process embraces our client's goals and collaborative partnership with each project. Alan Sims, the project lead, manages the communication and is accountable for key documentation, scheduling, quality-control and reporting to the core team. The project lead relies heavily on the direction given by the planning, design and production team leaders, who in turn, ensure all of their members are equally passionate towards the mission of the core.



CONTENT PLANNING

Programmers
Historians
Researchers & Documentors
Educators
Content Developers
Copy & Script Writers
Interpretive Specialists

DESIGN

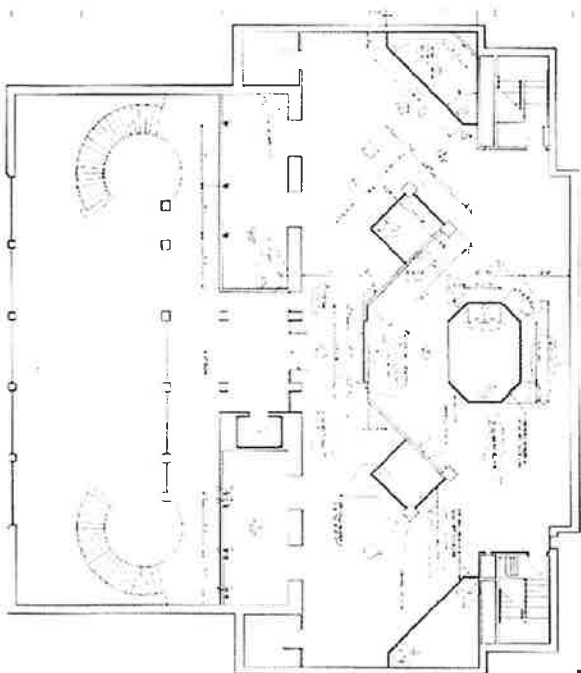
3D
Exhibit Designers
Interactive Mechanical Designer
Interactive Digital Designer
Liaison With Architects and Construction Managers
CAD Drafters
Production Designers

2D
Graphic Designers
Environmental Signage Designers
Map & Diagram Illustrators
Illustrators

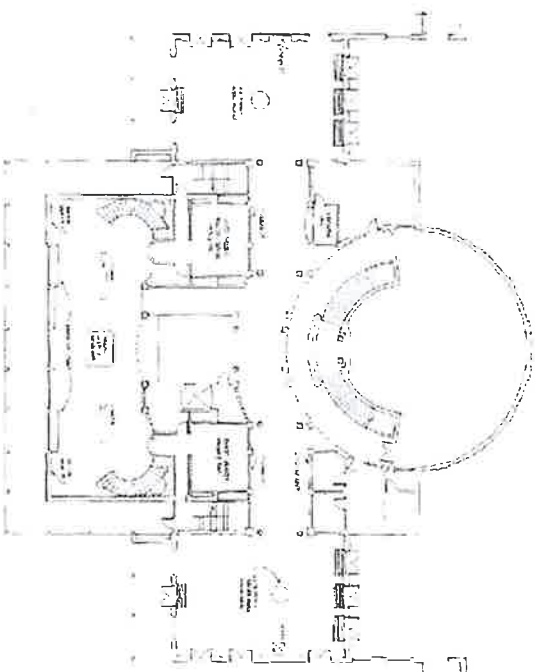
PRODUCTION

DIGITAL
Audio Visual, Lighting & Media Systems Advisor, Technologists
Lighting Advisor
Technologists

PHYSICAL
Exhibits, Scenic & Dioramas
Mechanical Interactive Advisor
Artifact Mounter
Sensorial Implementer
Exhibit Fabricator
Graphics Producer
Scenic & Diorama Producer
Film Editor & Producer



MEMORIAL HALL MUSEUM



PROJECT SCOPE

In recent years, symbols associated with the collective memory of the Lost Cause, such as Confederate monuments and the Confederate flag, have re-emerged as part of the country's social and political discourse. As in the past, the Lost Cause movement has had an adverse impact on communities across the country as these symbols have generated controversy, inflamed passions, and in some cases invoked violence. Stone Mountain Park, Georgia, home to the largest Confederate sculpture and memorial in the country, seeks to reinterpret the site in order to "tell the truth" about the monuments origins and the history behind the Lost Cause movement. Memorial Hall will serve as a "gateway for learning about Southern history." The new exhibit will expand the "interpretation of the sculpture as art, the technological achievement it reflects, and its relationship to local history."

STONE MOUNTAIN PARK

Stone Mountain Park, owned by the State of Georgia and managed by the Stone Mountain Memorial Association (SMMA), is located twenty miles east of downtown Atlanta. The organization's mission is to sustain, enhance, and protect Stone Mountain Park, its facilities, and environs, by "striving for excellence through an enriching experience that addresses the area's historical, natural, cultural, and recreational resources for all our guests." Each year millions come to the Park, making it the most heavily visited attraction in Georgia. Stone Mountain is also financially independent. All operations, maintenance and capital improvements are funded through revenue generated by fees collected from visitation and usage.



Physically, Stone Mountain Park is comprised of approximately 3,200 acres of woodlands, lakes, walking trails, roads, and other man-made features and attractions. These assets and improvements surround the sites central landscape resource and namesake, one of the largest exposed granite monoliths in the world. With a base more than five miles in circumference and an elevation of 825 feet, the imposing quartz monzonite was formed from the Earth's magma over 300-million years ago. Most of the Park's visitor resources, including Memorial Hall, were established in the 1960s and early 1970s. Within the site boundaries are a collection of historic structures, a skyline ride that takes visitors to the top of the mountain and back, and a 1940s scenic railroad that offers a five-mile excursion around the base of the mountain in open-air cars, just to name a few.

However, the largest draw within the park is the 90-foot-bas-relief of Confederate's Jefferson Davis, Robert E. Lee, and Thomas Jonathan "Stonewall" Jackson, all on horseback, chiseled into the north face of the granite mountain. These controversial sculptures, the largest of their kind in the world, were carved between 1915 and 1972.

THE VISITOR EXPERIENCE

The success of any great business is measured by its ability to recognize and fulfill the needs of its customers. In today's experience economy, it's also important to emphasize, promote, and measure the impact any company's goods and services have on their customers' lives. According to management advisors Joe Pine and Jim Gilmore, "An experience occurs when a company intentionally uses services as the stage, and goods as props, to engage individual customers in a way that creates a memorable event. Commodities are fungible, goods tangible, services intangible, and experiences memorable." Pine and Gilmore's work has led to new strategies for customer engagement and satisfaction.

Museums and history-related venues are not just stewards of the past but responsible for crafting engaging and memorable visitor experiences. Like any business, they must determine who their customers or audiences are and understand their characteristics, visiting patterns, needs, interests, and motivations. Museums effectively challenged by a wide range of other leisure activities and attractions and must compete for a visitor's attention in a competitive market.

PROJECT SCOPE

WHO IS THE VISITOR: IDENTIFYING AUDIENCES

The town of Stone Mountain is located 20 miles east of Atlanta. With a population of 6,200, it is seventy-eight percent (2020) African American. Some residents that remain have born witness to the activities and events involving the mountain. The surrounding county of DeKalb has a population of just over 750,000. Being in close proximity to Atlanta exposes Stone Mountain to almost 8,000,000 people in the region, making the greater Atlanta area, with its international draw, the second largest city in the southeast behind Washington, D.C.

In general, as an Atlanta suburb, the current and future visitation to Stone Mountain Park is ethnically and culturally diverse, and family oriented. Pre-Covid visitation was in the range of 3.5 to 4 million visitors a year. Those coming to the park still seek recreational activities, such as swimming, boating, golf, walking, biking, and running. Others take advantage of the trail system for exposure to the area's natural resources. And still more use the campgrounds, ride the skyline, explore the historic resources, participate in children's activities, or experience the 4-D theater.



There are numerous ways to identify potential audiences for a particular experience, including demographics and psychographics or lifestyle considerations. However, in general terms, Stone Mountain audiences are divided into the following:

- **Intrastate Visitors**—these are people that live in Georgia and are exploring their own state.
- **Interstate Visitors**—are those that come from neighboring or regional states, such as Alabama, Tennessee, South Carolina, North Carolina, Florida, Texas, and Mississippi.
- **International Visitors**—are those that venture to the Atlanta area from abroad. Most of these travelers hail from the United Kingdom, Germany, Canada, Brazil, and China.
- **Local Community**—With a population of over 750,000, DeKalb is the third largest county in Georgia. There is a local expertise and knowledge base they possess of the site.

SPECIALTY AUDIENCES

Visitation surveys are an effective way to gauge the different audience types who frequent Stone Mountain Park attractions. In lieu of those surveys; however, it is important to recognize that the most effective sites are those designed for a specific audience. Although Stone Mountain Park offers numerous levels and layers of attractions and interpretation that are consumable by various types of audiences, specific groups can be targeted and interpretive media created to address their interests and needs. Some of the more identifiable and mainstream audiences that visit places like Stone Mountain Park in search of historic resources include:

- **History Aficionados:** One of the largest audiences is aficionados, or history buffs. They can consist of organizations, heritage groups, families, or just individuals. All have a unique passion for the subject matter, a wide variety of backgrounds, and demand a high level of interpretive expertise. Providing unique experiences for these visitors is one of the keys to success.
 - **Educational Groups:** There are two types of groups related to education and schools. The first is local teachers seeking to enrich their classroom experience through field trips. Their goal is to enrich the subject matter by visiting places associated with historic events or characters. Having curriculum-based programming is important.
- The second, and often overlooked crowd, are youth organizations, such as scholastic groups, bands, Boy Scouts and Girl Scouts, or sports teams, in and outside the area. They often try to find secondary attractions to spend time while involved with their special extracurricular or school-related trips.
- **Heritage Travelers:** This audience seeks specific history related sites and activities. They demand in-depth interpretation and have a wider array of interests. Often, they combine site visits with dining, shopping, and recreational activities. They also have a higher level of family travel. In many ways those who seek natural areas are included in this group.
 - **Group Tourists:** They can be anything from tour buses to elder hostels to church groups. Their activities are often driven by cross-marketing with other trendy sites or tailor-made visitation packages.

- **Drop-ins:** This is the most unpredictable group. They show up by chance, either off the main highway or visiting someone in the area.
- **Recreational Visitors:** This audience seeks recreation first but looks for opportunities to visit nearby historic resources that add to the overall experience of the trip. Walking and biking trails, along with camping and watersport activities are seen as enhancements to these visitors. Stone Mountain Park visitors fall within this category.
- **Internet Users:** In pre-Covid 2019, 148.3 million travel bookings were completed online. Most online travel planners are somewhat or extremely satisfied with their experiences in using the Internet to plan their trips. The primary tools for travel planning are online travel agency websites, search engines, company websites and destination websites. Airline tickets, overnight lodging accommodations, and car rentals are the dominant travel products and services purchased online by travel planners.

Visitors to destination websites may choose to not make a physical visit to the site, but instead seek information about the story for various purposes. An undervalued and underemphasized audience type, those who hit history-related websites can be the best repeat customers. They seek various types of multi-media experiences and can direct others to these opportunities. Finding ways to monetize their visit can produce extended revenue streams for the park.

INTERPRETIVE PLANNING

After identifying potential audiences, an important next step in the design process is interpretive planning. The National Park Service defines interpretation as "communication that conveys the significance and underlying meaning of a place." An interpretive plan is a tool that identifies the stories, determines the location where stories are told, and the types of storytelling mechanisms that are used to deliver these stories to audiences.

The aim of interpretation is to help visitors connect with a place and understand why it is important, relevant, and meaningful. Interpretation is also about understanding, not just knowing; it connects the tangible (a building, an event, a landscape) with the intangible (an idea, a core value, a goal).

VISION STATEMENT

The Stone Mountain Memorial Association crafted a vision statement to guide the reinterpretation of the site and the development of new exhibits in Memorial Hall.

We recognize the history of Stone Mountain is not so much a Civil War story as it is a story about the memory of the Civil War. And while there are many museums dedicated to telling the story of the Civil War and the Confederacy, there is no museum solely dedicated to telling how *they have been remembered. To that end, the proposed exhibit should explore the significant* role that monuments to the Confederacy and its leaders, like the carving on Stone Mountain, have played in shaping how the public has remembered the Civil War. Since Stone Mountain is the world's largest Confederate monument, it is a story that cannot be told as effectively anywhere else.

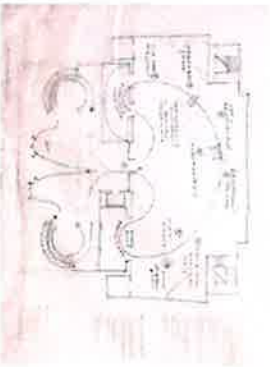
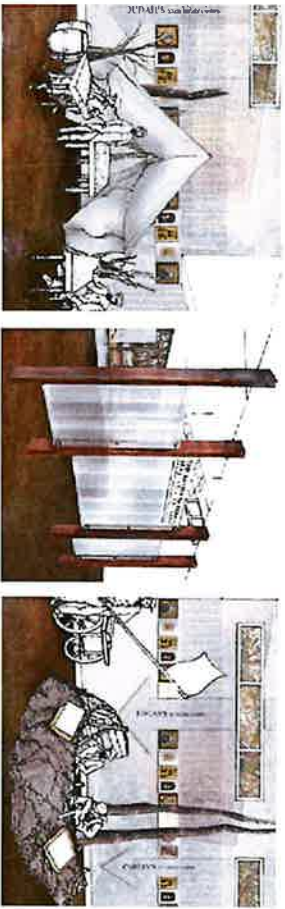
MAIN THEME AND THE POWER OF COLLECTIVE MEMORY

History and Memory: Memorial Hall will explore the role that Stone Mountain Park's Confederate monument has played in shaping, perpetuating, and using the South's collective memory of the Civil War and their Confederate past.

Since the early nineteenth century, various collective memories have been created that attempt to define the country's numerous national identities. These memories, in general, are a product of both perceived and real threats inherent in the market realities created by capitalism. Even among the populations who have prospered – indeed, especially among them – fear, doubts, mistrust, and uneasiness have been constants. As a result, the collective memories created by various peoples in our society over the years have all been grounded in a sense of peril. Even when memories exalt triumph, vindication, or heroism, the footing rests on anxiety.

INTERPRETIVE DIRECTION

The interpretive themes developed for Stone Mountain will explore how the collective memory created by Southerners in response to the real and imagined threats to the very foundation of Southern society, the institution of slavery, by westward expansion, a destructive war, and eventual military defeat, was fertile ground for the development of the Lost Cause movement amidst the social and economic disruptions that followed. Using various interpretive methods, techniques, media, and public engagement, while employing the most current scholarship, we seek to create an exhibit not just about the past but about the future and place this vanquished history has in our national discourse.

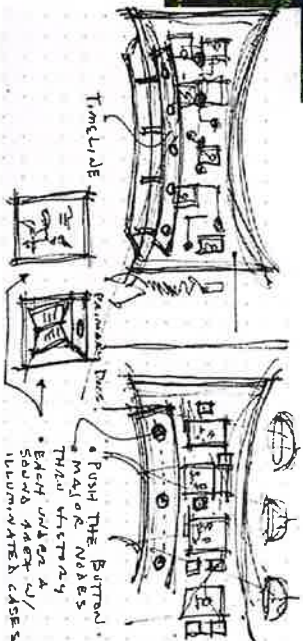


STONE MOUNTAIN INTERPRETIVE THEMES/EXHIBITS

1. THE STONE MOUNTAIN EXPERIENCE

Stone Mountain, as a place, first attracted pre-historic indigenous peoples more than 8,000 years ago. Gradually, these peoples disappeared due to maldades, famine, war, or a combination of all three. New Tribes emerged by the early seventeenth century, but European diseases followed, killing thousands. The 1821 Treaty of Indian Springs with the Creek Nation, which ceded land east of the Flint River, expelled indigenous tribes, and opened up land to white settlers.

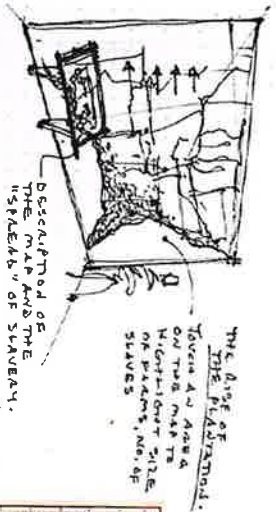
Though most antebellum Stone Mountain Village residents were small farmers, the growth of the local granite industry enhanced by railroad development after the Civil War generated quarries where millions of tons of rock was harvested for such prominent projects as the foundation of the Georgia Capitol building, the steps of the east wing of the U.S. Capitol, the dome of the Federal Gold Depository at Fort Knox, and, ironically, the Lincoln Memorial where Dr. Martin Luther King, Jr., would deliver his 1963 "I Have a Dream" speech referencing Stone Mountain.



2. GEORGIA, THE ROAD TO DISUNION, AND THE CIVIL WAR: MANIFEST DESTINY AND WINNING THE WEST

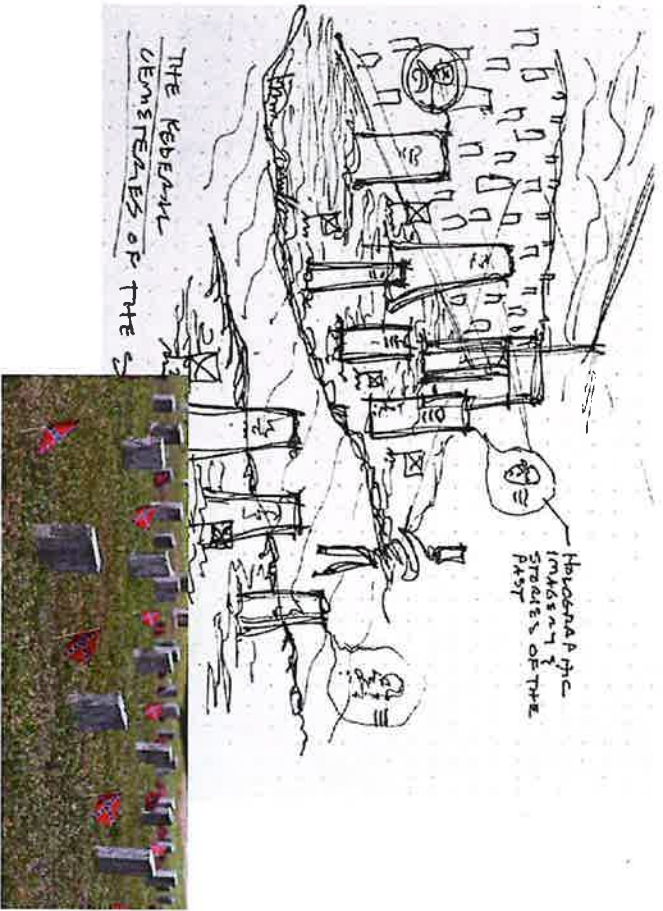
This exhibit will contextualize and define for visitors how the country became disunited over the issue of slavery in the decades between the end of the War of 1812 and the outbreak of the Civil War in 1861. Before the conflict, slavery and its products, such as cotton, generated national wealth in both sections of the country. However, the very potency (political and economic) of the slave-owning system began to create fear in the non-slave-owning states. Outside slave-owning areas, the United States was largely a society of small farmers, small towns, and small businesses, and most Americans in the free states sought to keep it that way. Indeed, it was for this very reason they engaged in the frantic "westward movement" in hopes of holding off the emergence of factory towns, slums, and the desperation of wage-earning already beginning to dominate places like New England. The west, therefore, was imagined as a place where history could be

Yet, the slave-owning states – the Slave Power – coveted this same west, and, because the plantation was a form of industrialization, the power of wealth and degradation of work represented by the slave system was seen as a threat to the hopes of many in the free states – particularly young white males who wanted to see the small-scale world of farm and shop spread west. Georgia was a major player in the slavery debate and its expansion into emerging western territories. Using primary source documents and materials from the period, including writings and speeches from characters like Robert Toombs, Alexander Stephens, and others, we will demonstrate how, up until the Civil War, the slave system was the Union's most important and profitable resource, at the same time the nation's most divisive issue.



3. Monuments and Mythmaking: The evolution of commemorating Civil War dead

This exhibit area will impress on visitors how those who died during the war were memorialized during and immediately after the conflict ended. This interpretation will make use of artifacts, imagery, personal stories, and interactive technology to illustrate how monuments moving from cemeteries to the center of town as iconic statues representing the South's reverence for the character of the Confederate soldier it should be noted that the importance and contributions of African Americans to Union victory were overshadowed and marginalized by efforts to commemorate the valor of white soldiers.



4. The Myth of Reconciliation and Reunion: Emancipation, the Failure of National Reconstruction, and the African American Experience

Although the Federal war effort against the Confederacy was to defeat the secession movement and restore the Union, it quickly evolved into a war to destroy the slave system itself. Many factors combined to produce this transformation, but the shift was quickly enshrined in the nation's collective memory as a benevolent deliverance for former slaves, with Abraham Lincoln beaufied as the Great Emancipator. Even as this memory was being created, it was divorced from the reality of Reconstruction's attempt to reorder the former slave states and the insurgency war led by ex-Confederates to regain control of southern legislatures through intimidation and violence. However, by the late 1870s, a new collective memory of the war emerged to help soothe the trauma of defeat that had little to do with national reconciliation or reunion, and at the expense of social justice and racial equality for African Americans whose own collective memory of slavery and Reconstruction became a casualty of Manifest Destiny. Black leaders, such as Frederick Douglass, battled with Confederate sympathizers over the emerging black collective memory and significance of slavery and the Civil War as a struggle for freedom.

5. Remembering the War: How collective memory reshaped the cause, outcome, and meaning of the Civil War

This exhibit will immerse visitors in the role white Southerners played in the decade following the end of regional Reconstruction in fashioning a collective memory of the war that justified secession (states' rights) and discarded slavery (a central canon of every seceding southern state constitution) as a Confederate cause. Though defeated, they refused to acknowledge they had been on the wrong side of the nation's divine history and should be recognized once more as an integral part of another emerging collective memory - the American military tradition - being brought to bear against the enemies of westward expansion - specifically Native Americans. In the 1890s, organizations like the United Daughters of the Confederacy and the Sons of Confederate Veterans materialized as promoters of Lost Cause ideology, using the Lost Cause memory of the war to build monuments and veterans' homes, support Confederate-based education initiatives, encouraged federal and state-mandated racial segregation and the disfranchisement of African Americans.



9. A Granite Canvas: The Art of Bas-relief at Stone Mountain

As a work of art, the Stone Mountain carving is the largest bas-relief sculpture in the world and is one of the oldest types of artistic expression. Some of the earliest known bas-reliefs are on the walls of caves, carved perhaps 30,000 years ago.

The most famous American relief is Mount Rushmore, the huge monument sculpture memorializing the great American presidents, started in 1927 and completed in 1941 by sculptor Gutzon Borglum, the initial artist for Stone Mountain.

10. Envisioning the Future: The Redemptive Power of Civic Imagination

To realize the full potential of our communities, build on our past, and chart paths forward, we need to be able to imagine what better worlds would look like. Civic Imagination enables communities to think creatively by connecting with others in new ways and tackling challenging issues through imagination. This exhibit encourages people to share their memories, dreams, and hopes with each other. Such diverse perspectives provide the social foundation for civic life, and to talk across their differences, to explore how various peoples and cultures across the country and around the world have used the power of storytelling and imagination to envision real world spaces and places as a first step in overcoming our differences and building real-world blueprints for the communities of tomorrow. Through large screen interactive monitors that record and share their plans, visitors, as cultural architects and civic agents, will be able to envision their own idea of the future. This information will be gathered and available to other visitors to Stone Mountain or online through the Stone Mountain website. This project can also be administered through workshops and educational programming.



What is the Civic Imagination?

To realize the full potential of our communities, build on our past, and chart paths forward, we need to be able to imagine what better worlds look like -- even now, especially now. Responding to this imperative, the Civic Imagination Project activates memory and people's visions for what a better tomorrow might look like as a necessary step to connecting with others and taking action to achieve real world goals. Over the last 6 years, our project team has built tools with people from all over the world, helping them build action plans to realize imagined solutions. Our workshops enable individuals and communities as they think creatively, connect with others in new ways, and tackle challenging issues with imagination.

Civic Imagination

Participating Features:
A List Making and an Online
Civic Imagination Project

Imagined Future: A Better Tomorrow
Imagined Future: A Better Tomorrow
Imagined Future: A Better Tomorrow
Imagined Future: A Better Tomorrow

The civic imagination, defined as our collective vision for what a better tomorrow might look like, provides us with an approach that enables us to:
Imagine a better world; Imagine the process of change; Imagine ourselves as civic agents;
Imagine our connections with a larger community; Forge solidarity with others with different experiences than our own;
Bring an imaginative dimension to our real world spaces and places.

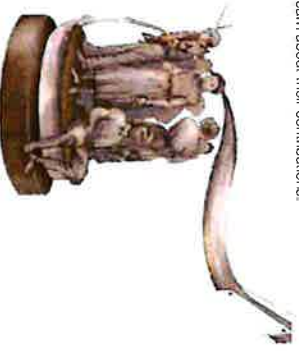
For us, imagination and storytelling are a much-needed first step toward building real-world plans and interventions. To activate the civic imagination, we conduct workshops and brainstorming sessions with people from a wide range of communities to map and analyze their collective memories and the stories that inspire and connect people, bridging the gaps people see as dividing us. Tapping our methods and approaches, the civic imagination helps communities build collective identities by allowing them to reflect on shared histories and envision alternative futures. Such community building operates on interconnected levels. Crucially, the civic imagination surfaces resonant hopes that identify affinities between community members. The civic imagination also helps people develop a narrative that frames their shared values.

Finally, the civic imagination inspires civic action by defining collective goals. Storytelling plays a crucial role in each of these processes, helping us identify our collective identities, values, and goals, and creating a sense of connection even as we respect our different experiences.

ADDITIONAL INTERPRETIVE RECOMMENDATIONS:

Exterior Terrace – “I Have a Dream” Sculpture Garden
In addition to the galleries in Memorial Hall, we propose as an additional interpretive asset that involves expanding the terrace just outside the first-floor gallery to create a sculpture garden that extends into portions of the memorial lawn. The garden will feature historic African American characters who fought for social justice and whose work reached the entire nation. In the center is a sculpture of Martin Luther King, Jr., standing on Stone Mountain granite steps, not unlike the Lincoln Memorial, with Jackie Robinson, Andrew Young, John Lewis, and Julian Bond close by. The intent is to symbolically recreate King’s “I Have a Dream” speech where he references Stone Mountain. All the supporting characters are considered Georgians and were at the March on Washington, with Lewis also speaking.

Other statues of significant Georgia Civil Rights leaders in the garden include Walter White, Benjamin Mays, Grace Towns Hamilton, Bernice Johnson, Hosea Williams, Julian Bond, Vernon Jordan, and Charlayne Hunter. The garden is juxtaposed with the Stone Mountain bas-relief of David, Lee, and Jackson. The experience will allow visitors to walk among these sculptures and learn about their contributions.



Mobile Technology and the Visitor Experience

Technology is continuously reshaping the museum experience. SMP can deliver engaging experiences that were not possible before. Virtual tours, mobile first websites, mobile apps, video, e-commerce, gamification and much more are possible with mobile phones.

Applying this technology in various ways for museum and historic sites can offer interactive and immersive experiences that provide both online and offline opportunities to engage visitors. These experiences can build relationships and ongoing support for museums, interpretive centers, historic sites, and other non-profit businesses.

Opportunities include:

Digitally Led In-Person Experiences— Unlike live-streamed video or podcasts, both of which are consumed remotely, immersive digital experiences take place within Memorial Hall.

Social Media— The use of social media outlets, like Facebook, Twitter, Instagram, Foursquare (location), YouTube (video sharing), and Tik Tok have added a new and exciting layer of information and interpretation to historic sites.

These media types can attract audiences that would be considered non-traditional, such as those under the age of 25 who visit historic sites in relatively few numbers. They do, however, enjoy making their observations, opinions, and criticisms known to the world through social media outlets.



Live Streaming from Memorial Hall— Perhaps the simplest way of providing a digital experience within a facility is to live stream from the center. Various live streaming platforms exist, such as Facebook and Twitch. Among the most popular, however, are Instagram, Facebook, and YouTube which supports both live streams and pre-recorded video content.

Stone Mountain Park Website— Websites are now the “front door” for almost every business. The overall design of the Stone Mountain website is central to the visitor experience and extremely important in creating a substantial first impression for potential and ongoing visitors to both the website and the Park. Adding interpretive information can ease visitors into their park and gallery experience. Thus, it should be easy to navigate and deliver impactful content.

- Help them make sense of the information on your website so they can find what they’re looking for.
- Show them options while presenting information in a way that aids their decision-making process.
- Let them know what actions they need to take.

Mobile Apps— Mobile apps are not the same of mobile websites. They are much more robust and engaging due to the nature of the content and features. Engagement is the key to creating more opportunities for more frequent visits and sharing of the content via email, text, or social media. This engagement means greater opportunity for the user to become visitors and donors for Stone Mountain. Mobile apps also provide data that give more insight to the user’s habits and interests. These analytics can be captured from the engagement and used to understand the visitor intent and interest.

- Habits: individual user spending, and both sharing/ comments are a few of the vital stats that can be captured with a mobile app.
- SEO is also a vital benefit of a PWA (Progressive Web App) mobile app because the content is retrievable by Google bots for search indexing in search results.
- Some of the significant features of a mobile app include: events/calendaring, chat walls, video, e-commerce, photo gallery, rewards & loyalty programs, social sharing, push notifications, news ticker, blog, one click call & directions, booking/reservations, online reputation and reviews.

QR Codes— Making a comeback in recent, QR codes can expand interpretive materials beyond labeling or panels. Connected to a digital archive, they can provide more narrative, images, audio and video, multi-language, and wayfinding opportunities using a handheld device. Because they can be web-based and not a proprietary app the materials can be continually updated using a conventional website or web-database. QR codes throughout experience for deeper interactive content, additional media and storytelling built within the site or subdomain, can be indexed and findable or only for on-site experience. Audio, video, unique stories and memories, references to speeches and historical events build your future - commitments to dialogue for a better tomorrow.

Educational Programming at Stone Mountain

It is important for Stone Mountain create education programs that build on the interpretation by exploring the significant role that monuments to the Confederacy played in shaping how the public remembers the Civil War. With the addition of the “I Have a Dream” Sculpture Garden, the conversation will be broadened to discuss how monuments and other forms of art contribute to our collective perception and understanding of history. Therefore, the educational programs and curriculum will be centered on history (Civil War to present day), memory, and civics. Currently, education initiatives at Stone Mountain focus on the park, so are primarily STEM-based (Science, Technology, Engineering, and Mathematical), and rarely mention the monument or any history. The proposed educational programming will make the gallery space, the park, and the surrounding community an extended, cohesive classroom.

Field Trips

For Stone Mountain to host student field trips and for the new interpretation to be taught in schools, both in the state of Georgia and nationally, it’s of the utmost importance to establish trust with educators. The most crucial step to building this trust is to have state standards-aligned curriculum and high-quality resources that can be directly implemented into the classroom. The Stone Mountain curriculum should encourage critical thinking by allowing students to “do history” by “thinking like a historian.” This will include activities and writing prompts that require students to consider a central historical question by analyzing primary sources and formulating their own conclusions about what happened in history. Through this process, they will practice historical thinking skills, consider multiple perspectives, and challenge the previous interpretation of the site. Again, this curriculum will be aligned to the state standards, require critical thinking skills, and provide high quality resources that teachers can use in their classroom.

Through this style of educational program, which again is directly aligned to the new interpretation, Stone Mountain will join the leaders in history education. Most state history assessments have been, or are in the process of being, rewritten to include historical thinking skills, as defined by organizations such as the College Board’s AP History classes and Stanford History Education Group (under the leadership of Sam Wineburg). Stone Mountain is uniquely positioned to contribute to history classrooms, not just in Georgia, with thought-provoking, relevant, historical inquiry.

Additionally, on-site educational programs will take a similar approach, but will focus more on memory. The concept of "collective memory" is rarely reached in history classrooms because it is not enumerated in state standards and is a challenging concept to teach in isolation. However, this poses an opportunity for Stone Mountain to fill a large gap in current history education with teacher professional development and on-site programs on collective memory, which then can be added to curriculum in the future after trust is established. When visiting Stone Mountain, students will have the opportunity to learn about multiple examples of collective memory, evaluate the role of monuments in collective memory, and ultimately, analyze the collective memory of the historic site.

Georgia History Standards

Note: Only two years of history instruction have exams through the Georgia state test, Georgia Milestones. Grade 8 has an end-of-grade social studies exam, High School U.S. History has an end-of-course social studies exam. Other years/courses do not have a state-wide assessment.

Fourth Grade United States History (Year 2): Revolution to Reconstruction

- a. Describe the roles of Abraham Lincoln, Robert E. Lee, Ulysses S. Grant, Jefferson Davis, Thomas "Stonewall" Jackson, and William T. Sherman.
- b. Describe the effects of war on the North and South.
 - o SS4H6 Analyze the effects of Reconstruction on American life.
- c. Describe the effects of Jim Crow laws and practices.

Fifth Grade United States History (Year 3): Industrialization to the Digital Age

- o The Civil War is not explicitly covered in 5th grade standards, but this grade level is a great opportunity for teachers to use Stone Mountain resources as review from the previous grade. Further, the proposed curriculum includes content to analyze change over time from the Civil War to the present day.
- o SS5H6 Describe the importance of key people, events, and developments between 1950-1975.
 - a. Analyze the effects of Jim Crow laws and practices.
 - b. Explain the key events and people of the Civil Rights movement.

Eight Grade Georgia Studies

- o SS8H5 Analyze the impact of the Civil War on Georgia
- o SS8H11 Evaluate the role of Georgia in the modern civil rights movement.
- o SS8H12 Explain the importance of developments in Georgia since the late 20th century
- o Analyze Georgia's role in the national and global economy of the 21st Century, with regard to tourism, Savannah port expansion, and the film industry.

High School: United States History

- o SSUSH19 Evaluate key events, issues, and individuals related to the Civil War
- o Examine the influences of Ulysses S. Grant, Robert E. Lee, Thomas "Stonewall" Jackson, William T. Sherman, and Jefferson Davis.
- o SSUSH21 Analyze U.S. international and domestic policies including their influence on technological advancements and social changes during the Kennedy and Johnson administrations
- o Investigate the growth, influence, and tactics of civil rights groups, Martin Luther King, Jr., the Letter from Birmingham Jail, the I Have a Dream Speech, and Cesar Chavez.

Essential Questions for Stone Mountain Educational Programs

These essential questions should guide all educational programming and curriculum development. When posed to students, the essential questions do not have a correct answer, although some answers will be better than others.

- How should history be preserved?
- What is the purpose of historical monuments and memorials?
 - o How do you think the content, location, and other aspects of historical monuments and memorials should be decided?
- What is the impact of collective memory?
 - o What is the difference between collective memory and history?

Student Analysis of the Stone Mountain Carving and "I Have a Dream" Sculpture Garden

Student groups that visit Stone Mountain should primarily take place in the "I Have a Dream" Sculpture Garden. This location will be a unique, comfortable setting to discuss history, memory, and civics. For these programs, the following steps could be taken:

1. Discuss what students see, feel, think, and wonder about the Stone Mountain carving and the "I Have a Dream" Sculpture Garden (based on Harvard's Project Zero).
2. Explain the history of the creation of the Stone Mountain carving.
3. Explain the people in the "I Have a Dream" Sculpture Garden.
4. Analyze both the Stone Mountain carving and the "I Have a Dream" sculpture garden as works of art with questions like: What do you think the artist wanted to communicate? What feeling do you get from these works of art? What words help to describe both? What conclusions can you draw about these works of art?
5. Conclude with a discussion of what these works of art can tell us about the time period that they were created in and what they represent in the modern day.

Sample Lessons for Curriculum

The goal of the Stone Mountain Curriculum is to provide high quality resources that teachers can use in their classroom because they're aligned to the Georgia state standards and require critical thinking skills. These are samples of the kinds of lessons that could be included in the Stone Mountain Curriculum.

- Document-Based Question: Why was Stone Mountain created?
 - o 1914 editorial in the Atlanta Georgian by John Temple Graves
 - o Letters between Helen Plane, the Honorary Life President of the Georgia State Division of the United Daughters of the Confederacy, and Sam Venable, the owner of Stone Mountain.
 - o 1923 articles from Stone Mountain Magazine
 - o 1923 speech by artist Guizon Borglum to the Georgia General Assembly about the meaning of the monument
 - o 1958 press release from Governor Marvin Griffin on restarting the project and the SMMA's swearing-in ceremony
 - o 1970 speeches from the Unveiling Ceremony with the theme "Unholy Through Sacrifice"
- Change and Continuity Over Time: How have Confederate symbols changed over time?
- Compare and Contrast: Compare and contrast the ways the history of slavery and the history of the Civil War has been preserved.
- Compare and Contrast: Compare and contrast the Stone Mountain carving to the "I Have a Dream" sculpture garden.

PROJECT COST

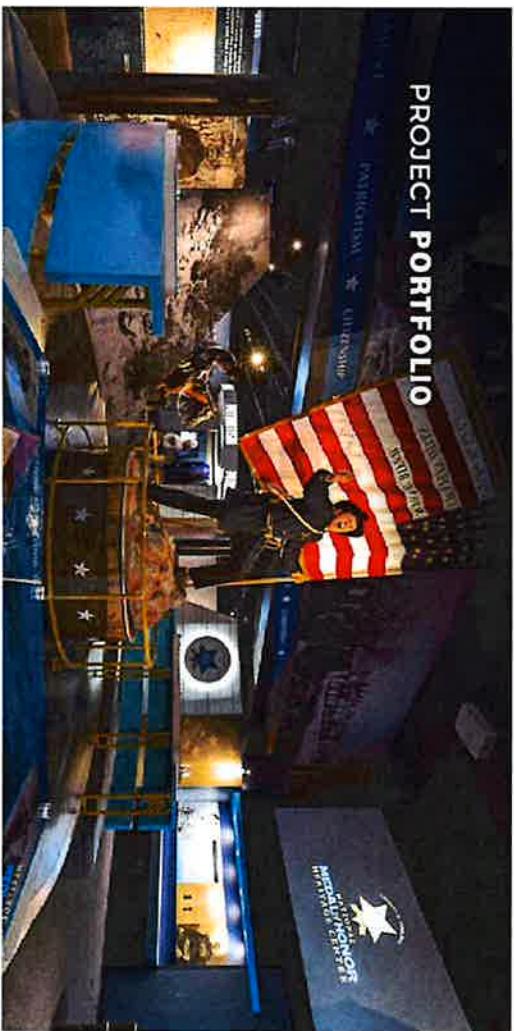
STONE MOUNTAIN MEMORIAL HALL MUSEUM PROJECT

DESIGN/ BUILD:

- Research, Asset Inventory, Programming, Interviews
 - Historical Analysis and Research
 - Townhall Preparation and Meetings to Community
 - Curriculum Input and Meetings with GA Dept. of Education
 - Initial Interpretive Plan reviewed, Modifications and additions to Interpretive plans from programming phase
 - Exhibit Ideations, White Modeling and Full-Color Renderings
 - Experience Immersion Inclusive of Sensory Elements of Audio and Visual
 - Learning Sensory exploration into various learning style methods for presenting content
 - Script work, Direction, Film, Production, F and Editing
 - Theater - Art/ Sculpture and Immersion
 - Production Drawings for Interior and consult for Exterior elements
 - Coordination between Architect, Landscape and Civil Engineers
 - Graphic Design, Interpretive and content layouts
 - Voiceovers
 - Sculptural Garden
 - Production & Installation
- 5 million to 7.5 million (range of magnitude is based upon the amount of technology utilized once the final exhibit design is completed, number of produced videos, and extent of sculptural art to include all of the above. This range is to be used purely as a guide for design/build services. The exhibit design and Interpretive Plan typically run from 10-12% of that figure.

PROJECT TIMELINE

- Exhibit Schedule
- Kickoff Meeting with Warner Team and SMMA (Week One)
- Meeting with SMMA to cover logistics, timeline, and Interpretive Direction.
- Stakeholder Meetings (Week Three)
- Public Meetings over design process and interpretive direction
- Background Research Begins (Week Three)
- Archival Research, Oral Histories, Securing Documents, Images, and Materials
- Preliminary Meeting with architect and/or contractor (Week Sixteen)
- Meeting to discuss mechanical/electrical issues for build-out
- Exhibit Conceptual Design (Week Twenty-Four)
- Meeting with SMMA to deliver conceptual design of exhibits.
- Background Research Completed (Week Twenty-Four)
- Final delivery of primary source/image/artifact and other exhibit content
- Exhibit Final Design (Week Thirty-Six)
- Meeting with SMMA to deliver the final exhibit design
- Schedule Follow-Up Meeting with Building Contractor (Week Thirty-Eight)
- Finalize any mechanical/electrical designs or issues
- Begin Exhibit Fabrication (Week sixty)
- Begin construction at Warner in Birmingham (Week Ninety)
- Begin Exhibit Installation
- Move exhibit fabrication to Stone Mountain to begin installation
- Ninety-Percent Final Installation Completion (Week Ninety Four)
- Review exhibit installation and create punch list
- Final Exhibit Completion (Week One Hundred)



MEDAL OF HONOR HERITAGE CENTER

The Medal of Honor Museum project is one that we are extremely proud of. We knew immediately that this was a project that would be close to our hearts and would instill pride and accomplishment in our entire team.

The goal of the museum was to reflect the character traits of Medal of Honor recipients so we knew this would be the guideline for our overall design process. Throughout the design phase, we sectioned the museum into focused areas of patriotism, citizenship, integrity, courage, sacrifice and commitment. You will find information pertaining to each of these traits within their specified areas inside the museum.

Our design focused on creating a timeline of wars and educating museum guests on individuals who have received the medal of



honor. We worked with historian, David Currey, to gather the content for the museum and that content directly influenced the design of the exhibits. Our team worked onsite at the museum for months creating the many scenes that are featured throughout the museum.

Warner Museums did all of the museum's interior design and construction to include the platforms, case work, graphic production and scenic development. We also did a large portion of the lighting, AV technology integration, exhibit walks and interactive platforms.

This was a project that reached across many work groups and many influences. It is a complete success and is now being enjoyed by visitors from all over the world.



More on this project

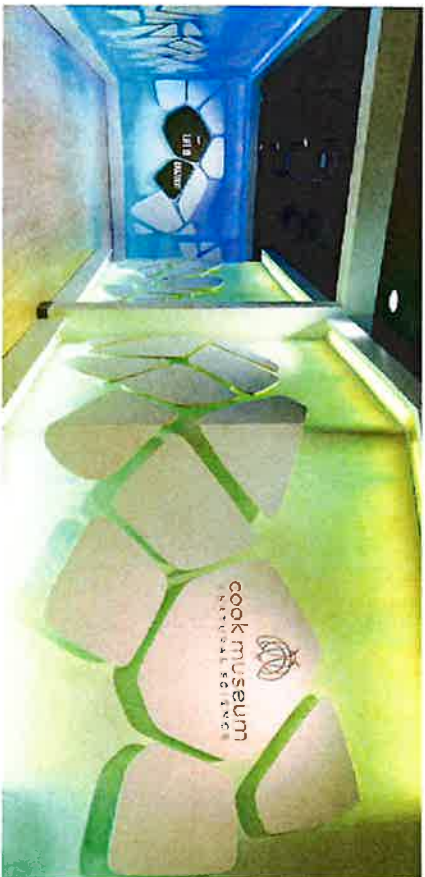
HERITAGE

COOK MUSEUM OF NATURAL SCIENCE

The Cook Museum of Natural Science, located in Downtown, Decatur, is a nonprofit foundation with a mission to engage, excite and educate visitors of all ages about the natural world around them. The 62,000 square foot museum focuses on the state of Alabama and its native wildlife and ecosystem. We played the roles of designer, fabricator, and installer in different areas of this very impressive museum. We designed and fabricated the "Know Before You Go" area that is located in the main entrance way of the museum. This area features a digital monitor, brochure holders, a display case, printed graphics and Wall Armor.

We designed and fabricated the "Legacy of Love" exhibit which is a hallway exhibit that pays tribute to both the history of the museum as well as recognizes its dedicated donors. We are proud

that we were chosen to fabricate and install the modular work tables and the window display in the "Maker Space" classroom. In the main Trek Exhibit, we think that patrons will find our fabrication and installation of the visually exciting exhibits to be near flawless. This project offered up many challenges and just as many rewards.



More on this project

NATURE



The 8,000+ square foot museum, in the heart of downtown Birmingham, Alabama houses the largest collection of original Negro League baseball artifacts in the country.

The mission of the museum is to present the history of African-American baseball in an unsurpassed manner by maintaining a world-class facility recognizing the Negro League's impact on Birmingham, and the world of professional baseball. The museum features the largest collection of original Negro League baseball artifacts in the country. It was a goal of the museum's to evoke a broad-sense of community and create an unparalleled cultural and educational experience that acknowledges the past while embracing the present and framing the future.

The highlight of the museum, to many, is the Satchel Paige hologram. Guests stand on one end and select any of the pitches that the legend tossed throughout his career. The holographic ball is then passed along to Satchel who throws the pitch in your direction allowing the recipient to experience the break of a Paige curveball or the velocity of his feared fastball. It's impossible to describe but by all reports an absolute joy to experience.

The Hall of Balls, a favorite of former players and their families, is a collection of baseballs autographed by former Negro Leaguers, Hall of Famers and Journeyman alike.



More on this project

[HERE](#)

SEA CREATURE EXHIBIT MCWANE SCIENCE CENTER

McWane Science Center is a state-of-the-art science center, aquarium and IMAX Dome Theater housed in a historic, refurbished department store building in Birmingham, AL. The museum features four floors of exciting, interactive, science exhibits and daily live shows, aquariums, laboratories, fossil and artifact collectors and a 5-story tall IMAX Dome Theater.

Warner Museums engineered and fabricated all cases and interactive stations within the Sea Monsters exhibit at the McWane Center. Warner Museums worked in concert with the artists at McWane to engineer and fabricate a series of exhibits that showcased actual and reproduced fossils as part of the overall exhibit.



More on this project

[HERE](#)



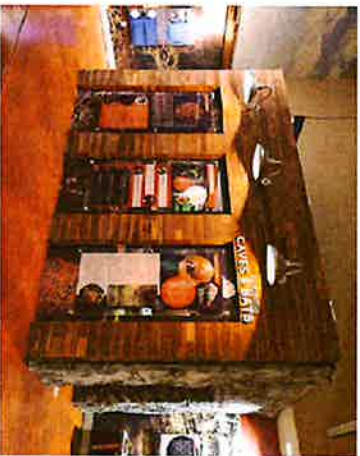
ALABAMA WILDLIFE FEDERATION NATURE PLEX

Experiential, Captivating, Unexpected. These are some of the words used to describe this interactive and engaging exhibit for the Alabama Wildlife Federation exhibit. Warner Museums designed a place where nature is amplified and sought to make it an immersive and memorable experience. The NaturePlex is a facility that serves as the Welcome and Education Center for the Alabama Nature Center. The facility includes a 120-seat theater equipped with up to date technology; hands-on Discovery Hall with wildlife and nature-based displays; educational classrooms; community room available for meeting use and rental; and a gift shop.

Warner Museums views a project like this as an opportunity to tell a story to a vast group of people spanning all ages while connecting to each of them in a unique way using every creative tool we have in our arsenal. We hope this was achieved at the Nature Plex for visitors to enjoy.

“Everybody was blown out of the water! ...great to work with people committed to excellence...”

TIM L. GOTTHARD
AWF Executive Director



More on this project

[HERE](#)

16TH STREET BAPTIST CHURCH

16th Street Baptist Church is a National Historic Landmark, a designation that they achieved in 2006. It is the site of one of the most heinous acts in our states and nation's history. On September the 15th, 1956 at 10:22 in the morning four innocent little girls were in the ladies lounge when a bomb exploded killing the four of them and two young men on the street. This event would rock the nation and the world as the civil rights leaders of the times and Dr. Martin Luther King Jr. would descend upon Birmingham to continue to the fight against racial injustice in the segregated south. We worked with 16th Street Baptist to honor the memory of the four little girls but also to tell the story of the church from its founding in 1873. We used historian David Currey to collaborate with 16th Street to create the interpretive piece of the project. This timeline is outlined in the perimeter of the basement along with video wall and monitors placed throughout the space

with stream content related to the bombing and civil rights movement. 16th Street also provide us with various artifacts as well which are inserted throughout the timeline to help tell their story. The centerpiece of the project is their experience room that we created. It contains pews from the original sanctuary and the dock that stopped at 10:22 on the day of the bombing. There is a fifteen minute documentary film that was created for the room by historian David Currey. The film features many poignant interviews including one with Sarah Collins the lone survivor of the blast that morning and sister to victim Addie Mae Collins. Dr. King's live eulogy is used throughout the film and at the end as a powerful and emotional reminder that they did not die in vain that day.



More on this project

[HERE](#)



ENCORE INTERPRETIVE DESIGN

Stories are important. They inform and inspire us. They convey knowledge and illuminate shared experiences. They help us confront our emotions and leave lasting impressions that build and sustain relationships. In short, stories give meaning and purpose to our lives. At Encore Interpretive Design, we value the power of stories. Located in Nashville, Tennessee, our job as interpretive planners and content creators is to work with our clients to produce unique, engaging, and memorable visitor experiences. Since 2008, we have shared our planning and storytelling passion on a multiplicity of projects for museums, historic sites, heritage areas, preservation groups, as well as a diverse range of for-profit companies and non-profit organizations. We also have an extensive background in site development, project management, and collections administration. Our goals is to build, share, and brand the stories that stimulate and empower audiences and individuals to explore and to learn.



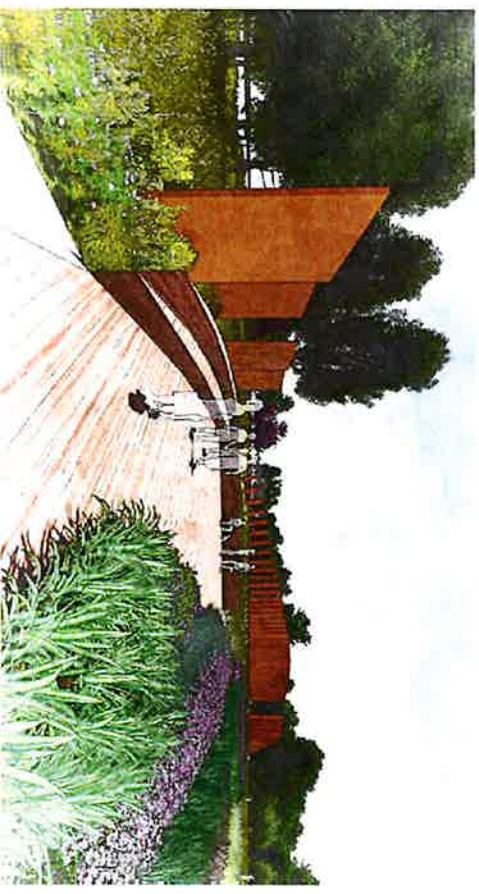
FORT NASHBOROUGH HISTORY CENTER

NASHVILLE, TN

Encore led the design and construction team to build the new Fort Nashborough History Center. The scope of work involved historical research, site master planning, facility design, visitor experience planning, exhibit design, and opinions of probable cost. The facility opened in 2017 and was recognized with a state contractor award and an Honor Award from the Middle Tennessee Chapter of the American Institute of Architects.

REFERENCE:

Tim Neitsch | Tim.Neitsch@nashville.gov | (615) 882-8400



AAITAFAMA ARCHAEOLOGICAL PARK

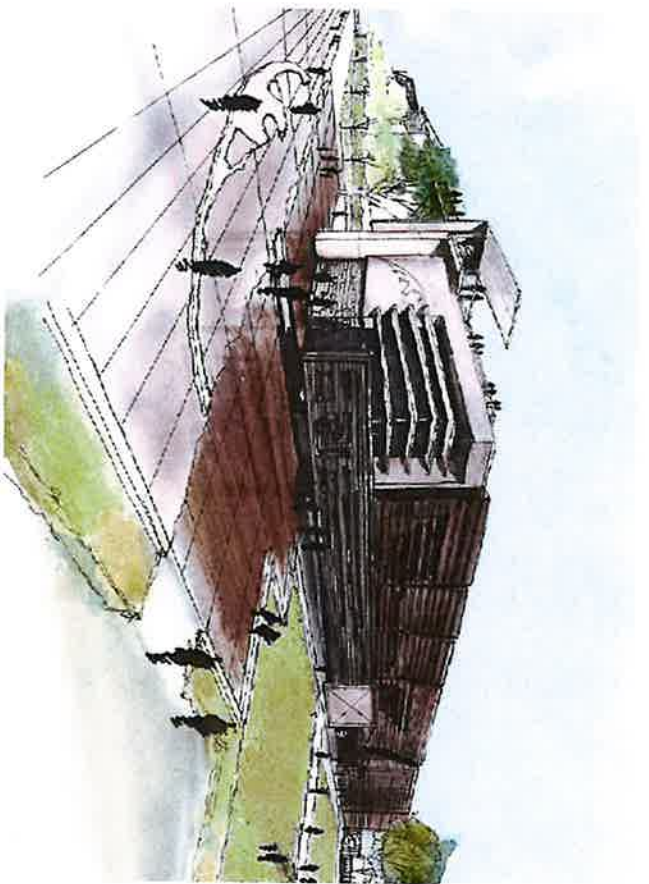
NASHVILLE, TN |

In 2017, Encore worked with Hodgson Douglas, L. A., to develop a Master Plan for this Mississippian archaeological site. Encore conducted historical research, visitor experience planning, developed interpretive themes, provided parameters for educational programming, and conceptual interpretive media design, including interactive and virtual reality components.

REFERENCE:

Chris Barkley | (615) 327-4447





THREE FORTS OF PRESQUE ISLE AND INTERPRETIVE CENTER

ERIE, PA |

Encore authored a Master Plan for the development of a 13.5-acre interpretive campus that includes reconstructed French, British, and America forts that once stood on the shores of Lake Erie from the mid to late-eighteenth century, a Seneca Village, and a 40,000 sq. ft. interpretive center. Viewed through the lens of sustainability, audiences will discover how human cultures have changed and transformed the environment and surrounding landscapes since the first indigenous peoples called the region home more than 12,000 years ago.

REFERENCE:
 Michael Fuhrman | (814) 965-3118 | hufspaceman@gmail.com



FORT MCALLISTER STATE PARK & HISTORIC SITE

RICHMOND HILL, CA

Site of the best-preserved earthworks remains built by the Confederacy. It fell in 1864 into the North's control ending Sherman's March to the Sea. The scope of work included all interpretive content and layouts, production and installation.



COVINGTON, GEORGIA
FFA/ FCCLA ARCHIVES

Samplings of 100's of GA interpretive projects, State Parks & Historic Sites



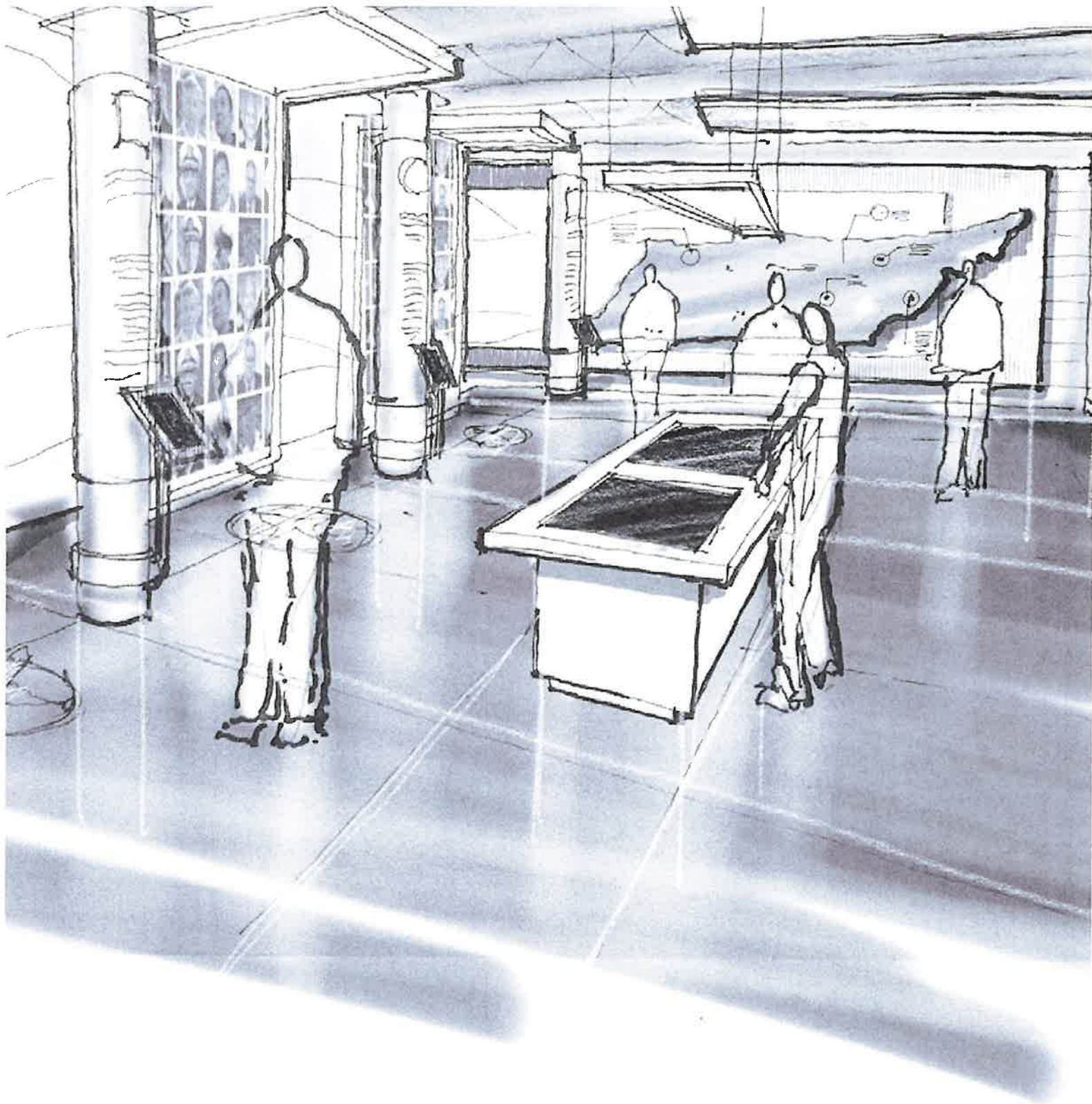
Beginnings through the 1960s



SWEETWATER STATE PARK & HISTORIC SITE
INTERPRETIVE CENTER

Centered around a textile mill that was burned down during the Civil War, this interpretive center focused on the livelihood and the culture of the people during the Antebellum years.





W WARNER
MUSEUMS

888.883.8087 | WarnerMuseums.com

Martin K. O'Toole

ATTORNEY AT LAW
Post Office Box 3221
Marietta, Georgia 30061-3221
(678) 232-8638
Email: martinkotoolesq@gmail.com

9 October, 2023

Georgia Department of Administrative Services
200 Piedmont Avenue, S. E.
Suite 1804W
Atlanta, Georgia 30304

Re: *Ante Litem* notice, Stone Mountain Memorial Association.

Dear Sir or Madam:

We send you this *ante litem* notice out of an abundance of caution.

We believe that the Stone Mountain Memorial Association, a creation of the Georgia General Assembly as codified in Official Code of Georgia Annotated § 12-3-191, *et seq.*, is acting in violation of its mandate as well as violating the Monument Protection Act found at Official Code of Georgia § 50-3-1.

However, the Georgia state *ante litem* statute, Official Code of Georgia Annotated § 50-21-26, seems to apply to only acts of negligence, not the intentional violations of the law. Consequently, while we wish to identify the acts which we believe are violate the Georgia Code, we think that the form of this *ante litem* notice will be helpful in drawing the attention of the State government to this actions and, if necessary, at least foreclose a legal fight over the requirement to give an *ante litem* notice.

Therefore, following the mandate of O.C.G.A. § 50-21-26, we identify the following required elements of that Code Section:

1. The State government entity's name is "The Stone Mountain Memorial Association."
2. (a) The action regarding the museum occurred on or about 20 June, 2023, with the engagement of the Warner Museums, a division of Culton Companies, Inc., to modify the historical presentations at the Park in defiance of the legislative mandate. Acting under information and belief, the displays have since been recently removed to prepare for the newly proposed, unlawful exhibits.
(b) The United Daughters of the Confederacy Flag Terrace Memorial was formerly located at the trailhead. The Confederate flags have been removed to a 'less conspicuous location' (by the admission of the SMMA Chief Executive Officer) in violation of O.C.G.A. § 50-3-1(b)(7) which requires that the flags "shall be relocated to a site of similar prominence, honor, visibility, and access within the same county or municipality in which the monument was originally located." The removal took place on or about 22 May, 2023.



Georgia Department of Administrative Services
9 October, 2023
Page 2.

3. The incidents occurred in the confines of the Stone Mountain Memorial Park, Stone Mountain, DeKalb County, Georgia.
4. The injuries suffered are violations of Georgia law and citizens are permitted by both common law and statute to demand that the laws be faithfully executed by employees and representatives of government agencies such as the Stone Mountain Memorial Association.
5. Pursuant to the ruling of the Georgia Supreme Court (Bd. Of Regents of the University System of Georgia v. Meyers, S14G0431, October 6, 2014) that a dollar amount must be stated, even if not perfectly accurate, we estimate that the damages for these two acts are \$55,00.00 plus the O.C.G.A. § 50-3-1(C)4 statutory treble damages of an estimated \$165,000.00. Should the SMMA restore everything as required by law, it can completely avoid any such expenses.

As stated above, the acts complained of are not negligent, but rather intentional, *ultra vires* acts.

This letter summarizes and represents our understanding of the facts and the law to the extent of the claimants' knowledge and belief and as may be practicable under the present circumstances. It would be expected that discovery in litigation will permit a more accurate definition of these items.

Finally, we cannot help but notice that the carving no longer seems to be properly maintained as required in O.C.G.A. § 12-3-191(7), *et seq.* This comes to our attention in face of the demands at public meetings by some members of the "Stone Mountain Action Coalition" that the carving be permitted to decay through lack of maintenance. They have made that demand in the face of the statutory requirement placed on the SMMA that the Monument be maintained.

The claimants in this matter include (but may not be limited to): The Georgia Division, Sons of Confederate Veterans, Inc., the Confederate Memorial Camp #1432 of Stone Mountain, Georgia, John Frost Murlin, Philip J. Autrey and Timothy Fred Pilgrim.

Sincerely yours,

Martin K. O'Toole

cc: Mr. Bill Stephens, Chief Executive Officer, Stone Mountain Memorial Association
Rev. Abraham Mosley, Chairman of the Stone Mountain Memorial Association
Mr. Chris Carr, Attorney General, State of Georgia



Brian Kemp
Governor

Rebecca N. Sullivan
Commissioner

November 28, 2023

Mark K. O'Toole, Attorney at Law
P. O. Box 3221
Marietta, GA 30061-3221

Re: DOAS file number: GL202305091
State Agency: Stone Mountain Memorial Assoc.
Date of Loss: 05/22/2023
Claimant: Sons of Confederate Veterans

Dear Mr. O'Toole:

We are in receipt of your correspondence advising us that you represent the above referenced claimant(s).

We acknowledge your notice of claim as per the allegations contained within your letter of October 9, 2021. The undersigned has been assigned to the case on behalf of Department of Administrative Services as the adjuster to the claim file.

We will initiate an investigation into the matter on behalf of the state agency and DOAS. Once our investigation is completed we will be in further contact with you concerning the agency's opinion regarding liability.

In closing, during the interim, if you have any questions or concerns, please feel free to contact the undersigned.

Sincerely,

Greg Strickland
Sr. Claims Specialist
GA Administrative Services
On behalf of Department of Administrative Service
Direct Dial: (678)-325-2662
Email: greg.strickland@doas.ga.gov



Martin K. O'Toole

ATTORNEY AT LAW
Post Office Box 3221
Marietta, Georgia 30061-3221
MartinKOTOoleEsq@gmail.com
678/232-8638

6 September, 2024

Mr. Greg Strickland
Senior Claims Specialist
Georgia Administrative Services
200 Piedmont Avenue
Suite 1220, west Tower
Atlanta, Georgia 30334-9010

RE: DOAS File Number GL202305091; Stone Mountain Memorial Association.

Dear Mr. Strickland:

This is a follow up to your letter of November 28, 2023.

We have never heard anything further about our inquiry concerning the violation by the Stone Mountain Memorial Association (SMMA) of O.G.C.A. § 50-3-1 and O.C.G.A. § 12-3-191, *et seq.*

We are preparing to file a complaint in the Superior Court of DeKalb County unless we can work out some negotiated settlement.

We believe that the facts show that the removal of the Flags from the trailhead and placement in their present locations clearly violates O.C.G.A. § 50-3-1(b)(1)(C)(7) states:

Nothing in this Code section shall prevent an agency from relocating a monument when relocation is necessary for the construction, expansion, or alteration of edifices, buildings, roads, streets, highways, or other transportation construction projects. Any monument relocated for such purposes shall be relocated to a **site of similar prominence, honor, visibility, and access** within the same county or municipality in which the monument was originally located....

The statements of the Chief Executive Officer Bill Stephens to the media make it clear that this was not done.

For example, Mr. Stephens said: "We will be taking them [the Confederate flags] off the most heavily travelled area of the Park and putting them at the base of the mountain where if someone wants to go see them, the confederate flags, then they can go see them."



Mr. Greg Strickland
6 September, 2024
Page 2.

In lieu of litigation, we would propose that the SMMA place the flags in a more visible location. Such can be confirmed by traffic counts, for example. The area in front of the carving would seem to be a possible site.

Additionally, the SMMA has gotten a bond issue with the announced intention of placing a “woke” display in the now-renamed Confederate Hall. This proposed display is clearly outside of the legislative mandate of O.C.G.A. §12-3-191, *et seq.*

For your information, I have attached a brochure prepared by the Warner Company describing its plans for the new exhibit. We have inserted a commentary in a different font to make clear our objections to this proposal.

Clearly, the portions of this new, expensive display do not comport with the legislative mandate concerning the park as laid out in O.C.G.A. § 12-3-191(7):

"Project" means Stone Mountain and property adjacent thereto acquired by the association and all accommodations, utilities, facilities, services, and equipment necessary or convenient, and all property, real, personal, or mixed, used or useful, including franchises and easements, in constructing, erecting, improving, remodeling, developing, equipping, adding to, extending, maintaining, managing, and operating Stone Mountain, located in DeKalb County, Georgia, and property adjacent thereto, **as a Confederate memorial** and public recreational area, and the construction, improvement, development, maintenance, management, operation, and extension of any part thereof, as to which the association has undertaken or agreed to undertake any action permitted by this part.

The history as delineated in the proposed Warner exhibit is simply an attack on the traditional Southland and even the American nation and does not serve as a fitting memorial to the Confederacy. Almost all of the proposed displays have nothing to do with the Confederacy and those which do mention the Southern republic only drip with hostility and contempt.

The legislative intent as to the purpose of the Stone Mountain Memorial Park is made even clear by referring to the concluding paragraph of O.C.G.A. § 50-3-1 which reads:

Any other provision of law notwithstanding, the memorial to the heroes of the Confederate States of America graven upon the face of Stone Mountain shall never be altered, removed, concealed, or obscured in any fashion and

Mr. Greg Strickland
6 September, 2024
Page 3.

shall be preserved and protected for all time as a tribute to the bravery and heroism of the citizens of this state who suffered and died in their cause.

Regrettably, unlike relocating the Flags, the Warner proposal is so seriously defective that it cannot be repaired; it must be abandoned.

However, a use for the bond issue could be to adopt a great emphasis on historical tourism as we proposed to the SMMA board a few year back. You can view a summary of this proposal on the SCV website at: <https://www.georgiascv.org/stone-mountain/>

Here you will find a written proposal, a power point presentation and a video.

We would appreciate a response to these points.

If I can provide any further information or assistance, please do not hesitate to call or write.

With every best wish, I remain,

Sincerely yours,

Martin K. O'Toole

MKO/hs

cc: Stone Mountain Memorial Association CEO Bill Stephens
Hon. Chris Carr, Attorney General of Georgia
Georgia Division SCV Commander Timothy F. Pilgrim
Georgia Division SCV Judge Advocate General Daniel Coleman
Georgia SCV Chief of Heritage Defense Tony Pilgrim

Enc: Warner brochure

IN THE SUPERIOR COURT FOR THE COUNTY OF DEKALB
STATE OF GEORGIA

GEORGIA DIVISION, SONS OF)
CONFEDERATE VETERANS, INC.;)
CONFEDERATE MEMORIAL)
CAMP #1432 OF THE SONS OF)
CONFEDERATE VETERANS;)
PHILIP J. AUTREY; JOHN F.)
MURLIN; TIMOTHY F. PILGRIM)
and BARBARA W. SMITH,)

Petitioners,)

vs.)

THE STATE OF GEORGIA,)

Respondent.)

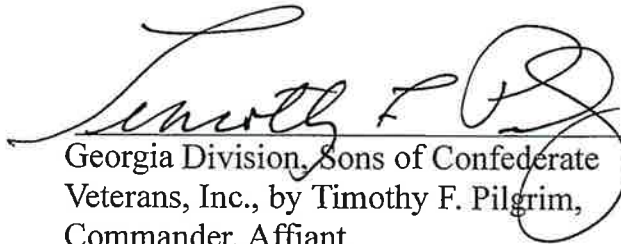
CIVIL ACTION

FILE NO. _____


VERIFICATION

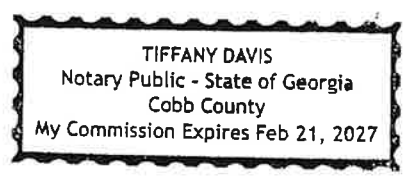
Personally appeared before the undersigned officer duly authorized by law to administer oaths, the Georgia Division Sons of Confederate Veterans, Inc., by Timothy F. Pilgrim, Commander, who, first being duly sworn, deposes, says and states on oath that the facts contained in the within and foregoing Petition for Writ of Injunction are true and correct.

This 18 day of June, 2025.

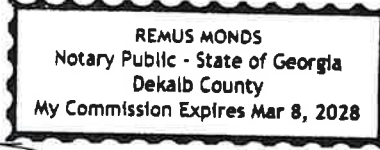

Georgia Division, Sons of Confederate
Veterans, Inc., by Timothy F. Pilgrim,
Commander, Affiant


Sworn to and subscribed before me
this 16 day of June, 2025.


Notary Public
Commission Expires: February 21, 2027



Sworn to and subscribed before me
this 30 day of June, 2025.





Notary Public
Commission Expires: 03/08/2028

IN THE SUPERIOR COURT FOR THE COUNTY OF DEKALB
STATE OF GEORGIA

GEORGIA DIVISION, SONS OF)
CONFEDERATE VETERANS, INC.;)
CONFEDERATE MEMORIAL)
CAMP #1432 OF THE SONS OF)
CONFEDERATE VETERANS;)
PHILIP J. AUTREY; JOHN F.)
MURLIN; TIMOTHY F. PILGRIM)
and BARBARA W. SMITH,)

Petitioners,)

vs.)

THE STATE OF GEORGIA,)

Respondent.)

CIVIL ACTION

FILE NO. _____

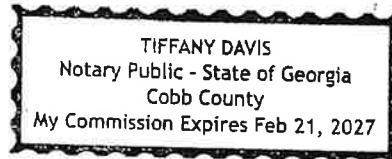
VERIFICATION

Personally appeared before the undersigned officer duly authorized by law to administer oaths, Timothy F. Pilgrim, who, first being duly sworn, deposes, says and states on oath that the facts contained in the within and foregoing Petition for Writ of Injunction are true and correct.

This 18 day of June, 2025.


Timothy F. Pilgrim, Affiant

Sworn to and subscribed before me
this 16 day of June, 2025.




Notary Public

Commission Expires: February 21, 2027

**IN THE SUPERIOR COURT FOR THE COUNTY OF DEKALB
STATE OF GEORGIA**

**GEORGIA DIVISION, SONS OF)
CONFEDERATE VETERANS, INC.;)
CONFEDERATE MEMORIAL)
CAMP #1432 OF THE SONS OF)
CONFEDERATE VETERANS;)
PHILIP J. AUTREY; JOHN F.)
MURLIN; TIMOTHY F. PILGRIM)
and BARBARA W. SMITH,)**

Petitioners,)

vs.)

THE STATE OF GEORGIA,)

Respondent.)

CIVIL ACTION

FILE NO. _____

VERIFICATION

Personally appeared before the undersigned officer duly authorized by law to administer oaths, Barbara W. Smith, who, first being duly sworn, deposes, says and states on oath that the facts contained in the within and foregoing Petition for Writ of Injunction are true and correct.

This 14 day of June, 2025.

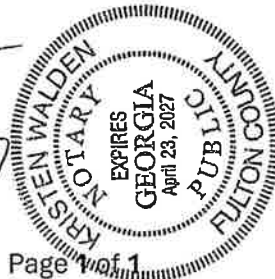
Barbara W. Smith
Barbara W. Smith, Affiant

Sworn to and subscribed before me
this 14 day of June, 2025.

Kristen Walden

Notary Public

Commission Expires: 4/23/27



IN THE SUPERIOR COURT FOR THE COUNTY OF DEKALB
STATE OF GEORGIA

GEORGIA DIVISION, SONS OF)	
CONFEDERATE VETERANS, INC.;)	
CONFEDERATE MEMORIAL)	CIVIL ACTION
CAMP #1432 OF THE SONS OF)	
CONFEDERATE VETERANS;)	FILE NO.: _____
PHILIP J. AUTREY; JOHN F.)	
MUERLIN; TIMOTHY F. PILGRIM)	
and BARBARA W. SMITH,)	
)	
Petitioners,)	
)	
vs.)	
)	
THE STATE OF GEORGIA,)	
)	
Respondent.)	

CERTIFICATE OF SERVICE

This is to certify that I have this day served the opposing party herein with a true and correct copy of the within and foregoing Petition for Writ of Injunction via delivery addressed as follows:

Civil Service via Sheriff's Office
Civil Service via Process Server
State of Georgia
c/o Gwen Middleton, Executive Business Operations Manager
200 Piedmont Ave, SE
West Tower, Suite 1804
Atlanta, GA 30334

Civil Service via Sheriff's Office
Civil Service via Process Server
State of Georgia
Chief Deputy Attorney General Wright-Banks
Deputy Attorney General Loretta Pinkston-Pope
Deputy Attorney General Logan Winkles
40 Capitol Square, SW
Atlanta, GA 30034

Civil Service via Sheriff's Office
Civil Service via Process Server
Stone Mountain Memorial Association
c/o Terry Thomas, Senior Communication Officer
c/o Danielle Farmer, Administration Assistant
Stone Mountain Department of Public Safety
2027 Old Hugh Howell Road
Stone Mountain, GA 30086

This 1st day of July, 2025.



Blake A. Poole
State Bar No. 606771
Attorney for Petitioners