

December 8, 2023

Via Email to OCR@ed.gov

U.S. Department of Education
Office for Civil Rights
400 Maryland Avenue, SW
Washington, DC 20202-1100

Re: Complaint Concerning Racially Discriminatory Policies of Evanston Township High School District 202

To Whom It May Concern:

The Defense of Freedom Institute for Policy Studies (“DFI”) is a national nonprofit organization dedicated to defending and advancing freedom and opportunity for every American family, student, entrepreneur, and worker and to protecting the civil and constitutional rights of Americans at school and in the workplace.

Pursuant to the discrimination complaint resolution procedures of the U.S. Department of Education’s (“Department”) Office for Civil Rights (“OCR”), DFI brings this federal civil rights complaint against Evanston Township High School District 202 (“ETHS”) in Evanston, Illinois for discrimination on the basis of race, color, and national origin in programs or activities that receive federal financial assistance in violation of the Equal Protection Clause of the 14th Amendment to the U.S. Constitution and Title VI of the Civil Rights Act of 1964 (“Title VI”).¹ DFI files this complaint as an interested third-party organization that strongly advocates for a republic where freedom, opportunity, creativity, and innovation flourish in our schools. Accordingly, DFI requests that OCR investigate the policies described below and put ETHS on clear notice that continued implementation of its racially discriminatory program will result in the withdrawal of federal funding.

Facts

¹ 42 U.S.C. § 2000d, *et seq.*



ETHS is a “four-year comprehensive high school occupying a 65-acre campus in Evanston, Illinois.”² As a public secondary school, ETHS is a “program or activity receiving Federal financial assistance” bound by the prohibitions of Title VI against discrimination on the basis of race, color, or national origin³ and by the 14th Amendment’s Equal Protection Clause.⁴

In its 2023–2028 District Goals, ETHS provides as follows:

As an anti-racist institution, ETHS will increase each student’s academic outcomes to realize post-high school success. We recognize that structural racism is the most devastating factor impeding the achievement of student. ETHS will eliminate the predictability of academic outcomes based upon race, and its intersection with gender, income, LGBTQIA+, disabilities, and emergent multilingual status.⁵

ETHS has also published an “Equity and Excellence Statement” pledging to achieve “equity” by, for instance, “[a]ssuring that all ETHS staff members actively continue to examine and eliminate institutional beliefs, policies, practices, and teaching that perpetuate racial disparities in achievement;” “[p]reparing all students to succeed in a multi-cultural society by teaching the contributions and viewpoints of all people;” and “[r]aising the achievement of all students while eliminating the racial predictability of achievement.”⁶

In furtherance of the goals reflected in the foregoing statements, according to the official student newspaper of ETHS, the school first offered “racial affinity” math and English courses (“racial affinity courses”) labeled “Advancing Excellence, Lifting Everyone” (“AXLE”) during the 2018–19 school year and restricted participation in the classes to black ETHS students.⁷ Likewise, during

² Evanston Township High School District 202, About ETHS, <https://www.eths.k12.il.us/domain/19> (last visited Nov. 29, 2023).

³ See 42 U.S.C. § 2000d; 42 U.S.C. § 200d-4a(2)(B) (defining a “program or activity” and “program” to include a local educational agency or other school system, “any part of which is extended Federal financial assistance”); see also U.S. Department of Education, Education and Title VI, <https://www2.ed.gov/about/offices/list/ocr/docs/hq43e4.html> (last visited Nov. 29, 2023) (“Agencies and institutions that receive ED funds covered by Title VI include: 50 state education agencies, their subrecipients . . . [and] 17,000 local education systems”).

⁴ See, e.g., *Parents Involved in Cmty. Sch. v. Seattle Sch. Dist. No. 1*, 551 U.S. 701 (2007) (applying the Equal Protection Clause to invalidate racially discriminatory policies of a local school district).

⁵ Evanston Township High School District 202, District Goals 2023–2028 (2023), available at <https://www.eths.k12.il.us/Page/829>.

⁶ Evanston Township High School Board of Education Equity and Excellence Statement (2011), available at <https://www.eths.k12.il.us/Page/957>.

⁷ Sophia Sherman et al., *Seeking Affinity*, THE EVANSTONIAN, Aug. 15, 2023, <https://www.evanstonian.net/in-depth/2023/08/15/seeking-affinity/>.



the 2020–21 school year, ETHS first offered a racial affinity Algebra 2 course labeled “GANAS”—named for a Spanish-language expression that means “giving it all you’ve got”—and restricted participation in the class to Hispanic students.⁸ As recently as April 2023, ETHS included in its website description of each of these racial affinity courses that the course “is restricted to students who identify as” black or “Latinx,” respectively.⁹

Following negative public media exposure beginning in April, ETHS revised each racial affinity course description to claim that, “[w]hile open to all students, this option section of the course is intended to support students who identify as” black or “Latinx,” respectively.¹⁰ These descriptions currently appear on ETHS’s website in its 2023–24 course request guide for individual sections of the following courses: 2 English, Precalculus, AP Calculus AB, and 2 Algebra.¹¹

ETHS Superintendent Marcus Campbell explained the reason for the revised course descriptions as follows:

That changed because what was written doesn’t reflect the practice. It’s just not restricted. The courses are open to everyone. **If push came to shove** and you look at the master schedule, and a kid needs calculus that period and **there’s nothing else that works and that kid is white**, of course we’ll put them in the affinity class.¹²

The racial affinity course descriptions presently available on the ETHS website for the 2024–25 school year take the sanitization of these descriptions to a new level, stating as follows: “This course will emphasize examples that some individuals in the [black or “Latinx,” respectively] community identify as shared experiences.”¹³ ETHS includes this description in individual sections of the following courses: 2 Algebra, AP Precalculus, and AP Calculus AB.¹⁴

Despite ETHS’s claim in its course listings that these classes are open to all, an August 2023 report from the ETHS student newspaper indicates that, at the very least, the GANAS Algebra 2 class “is

⁸ *Id.*

⁹ *Id.*

¹⁰ *Id.*

¹¹ See ETHS District 202, Course Request Guide, 2023–2024, <https://www.eths.k12.il.us/Page/2900> (last visited Nov. 28, 2023).

¹² Quoted in Sherman et al., *supra* note 7 (emphases added).

¹³ See ETHS District 202, Course Request Guide, 2024–2025, <https://www.eths.k12.il.us/Page/2900> (last visited Nov. 28, 2023).

¹⁴ *Id.*



composed exclusively of students and a teacher who identifies as Latinx.”¹⁵ A *Wall Street Journal* article published on November 26 reports that these classes remain “intended for students of the same race, taught by a teacher of color.”¹⁶

The purpose of segregating these classes based on race, according to Superintendent Campbell, is “to relieve performance anxiety for students of color in white-dominated spaces” and, similarly, to “creat[e] safe spaces for students of color.”¹⁷ According to the ETHS student newspaper article, students found that “the affinity spaces felt less like a classroom and more like a community.”¹⁸ As one student quoted in the article explained:

We had already looked around and saw ourselves in our classmates and been able to build community without having to mention why we’re all here gathered in this room because that’s how our culture works. We are able to just relax around each other, and we didn’t have any need for a statement.¹⁹

One student enrolled in a racial affinity class shared the following feelings about the course: “Like, oh my god, these are my people. We all have something real, we have a connection and now we have an empowering space.”²⁰

Statements from some enrolled students in the classes made clear that, in addition to being “intended for” students of a particular race or ethnicity, the courses actually conveyed different content²¹ and offered additional faculty-led services to students than the other sections of these courses. For instance, the ETHS student newspaper article described learning in a non-racial affinity class as follows:

¹⁵ Sherman et al., *supra* note 7.

¹⁶ Sara Randazzo & Douglas Belkin, *To Shrink Learning Gap, This District Offers Classes Separated by Race*, WALL ST. J., Nov. 26, 2023, https://www.wsj.com/us-news/education/to-shrink-learning-gap-this-district-offers-classes-separated-by-race-394d82dd?mod=us-news_trendingnow_article_pos1.

¹⁷ Sherman et al., *supra* note 7.

¹⁸ *Id.*

¹⁹ *Quoted in id.*

²⁰ *Quoted in id.*

²¹ While the statute that established the U.S. Department of Education restricts the Department and its offices from “exercis[ing] any direction, supervision, or control over the curriculum [or] program of instruction” of any school, 20 U.S.C. § 3403(b), it does not restrict the requirements of civil rights law with regard to who has access to that instruction. Here, DFI does not challenge the content of any curriculum, but rather requests that OCR investigate arbitrary racial classifications, written and unwritten, determining which students have access to or are encouraged to enroll in particular classes.



The content learned is generally produced through a westernized lens in which narratives are told through a eurocentric, white perspective and exclude the experiences of people of color. The traditional relationship between a teacher and student is authoritarian and does not center on the fact that every student in a classroom experiences the world differently depending on their backgrounds and identities.²²

By contrast, one graduate described the GANAS math classes as follows: “They wanted to get to know us better, and we would talk about things that we had in common, like that [*sic*] our families do or foods that we eat.”²³

A student who participated in an AXLE English class said, “It was different from a regular English class. We were able to talk about problems in the Black community, but it was also a good English class in terms of the actual subject.”²⁴

With regard to additional outreach affiliated with the racial affinity classes, another affinity student explained, “The teachers don’t just teach us math. Like any teacher, they go over the class work and host AM support and all of that, but I’m also having lunch with them, and I was still going in to meet with my teacher from last year.”²⁵

According to the *Wall Street Journal*, almost 200 black and Hispanic students signed up for racial affinity classes at ETHS during the 2023–24 school year.²⁶

Legal Analysis

ETHS’s Classification of Students on the Basis of Race Is Subject to Review Under the Supreme Court’s Strict Scrutiny Standard.

According to the 14th Amendment to the U.S. Constitution, “No State shall . . . deny to any person within its jurisdiction the equal protection of the laws.”²⁷ Title VI states, “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving

²² Sherman et al., *supra* note 7.

²³ *Quoted in id.*

²⁴ *Quoted in id.*

²⁵ *Quoted in id.*

²⁶ Randazzo & Belkin, *supra* note 16.

²⁷ U.S. CONST. amend. XIV, § 1.



Federal financial assistance.”²⁸ ETHS’s offering of racially segregated affinity classes is contrary to both provisions.²⁹

Indeed, the Supreme Court has repeatedly rejected the use of race as a factor in affording educational opportunities.³⁰ In the seminal case *Brown v. Board of Education*, the Court held that “the opportunity of an education . . . is a right which must be made available to all on equal terms.”³¹ As the Court recognized unequivocally earlier this year: “Distinctions between citizens solely because of their ancestry are by their very nature odious to a free people whose institutions are founded upon the doctrine of equality. That principle cannot be overridden except in the most extraordinary case.”³²

Consequently, when a state or subsidiary institution treats individuals differently based on a racial classification, such an “exception to the Constitution’s demand for equal protection must survive a daunting two-step examination known in our cases as ‘strict scrutiny.’”³³ To satisfy that standard of review, the government must show that its racial classifications are “used to further compelling governmental interests” and that its “use of race is narrowly tailored—meaning ‘necessary’—to achieve that interest.”³⁴

This standard of strict scrutiny must be applied to any racial classification made by a public school system or public school, no matter the particular race or ethnicity of those who allegedly benefit from such a classification or how benign the government entity implementing the classification may characterize it to be. This is because “the Equal Protection Clause . . . applies without regard to any differences of race, of color, or of nationality—it is universal in its application.”³⁵ As the Supreme Court has concluded:

²⁸ 42 U.S.C. § 2000d.

²⁹ Because the Supreme Court has concluded that the prohibition of racial classifications by Title VI is co-extensive with the same prohibition by the Equal Protection Clause, *see Regents of Univ. of Cal. v. Bakke*, 438 U.S. 265, 287 (1978) (opinion of Powell, J.), *cited by Grutter v. Bollinger*, 539 U.S. 306, 343 (2003), this complaint will focus solely on the Court’s Equal Protection Clause jurisprudence.

³⁰ *See, e.g., Students for Fair Admissions v. Harvard*, No. 20-1199 (2023); *Parents Involved in Cmty. Sch. v. Seattle Sch. Dist. No. 1*, 551 U.S. 701 (2007); *Brown v. Board of Education*, 347 U.S. 483 (1954).

³¹ 347 U.S. at 493.

³² *Students for Fair Admissions*, No. 20-1199, slip op. at 16 (internal quotation marks and citations omitted) (quoting *Rice v. Cayetano*, 528 U.S. 495, 517 (2000)).

³³ *Id.* at 15 (citing *Adarand Constructors, Inc. v. Peña*, 515 U.S. 200, 227 (1995)).

³⁴ *Id.* (internal quotation marks omitted) (citing *Grutter v. Bollinger*, 539 U.S. 306, 326 (2003); *Fisher v. University of Tex. at Austin*, 570 U.S. 297, 311–312 (2013)).

³⁵ *Id.* (citing *Yick Wo v. Hopkins*, 118 U.S. 356, 369 (1886)).



[E]mphasis on “benign racial classifications” suggests confidence in [one’s] ability to distinguish good from harmful governmental uses of racial criteria. History should teach greater humility. . . . “[B]enign” carries with it no independent meaning, but reflects only acceptance of the current generation’s conclusion that a politically acceptable burden, imposed on particular citizens on the basis of race, is reasonable.³⁶

In the same vein, it makes no difference that the segregation resulting from ETHS’s racial classifications is voluntary, if only for the groups targeted for the race-based benefit. It is the use of a racial classification itself to distribute and deny benefits, not mandated segregation between certain racial groups, that subjects the policy to strict scrutiny. For instance, if a school district opened an admissions lottery for enrollment in a new public high school and published a notice that the lottery was intended for white students, such a racial classification would no doubt be subject to strict scrutiny under Supreme Court precedent—no matter the voluntary nature of the white students’ decision whether to enter the lottery. Likewise, ETHS’s explicit encouragement of black and Hispanic students to enroll in particular English and math courses—and consequent discouragement of applications to such courses by students of other races and ethnicities—is subject to strict scrutiny under the Equal Protection Clause.

The strict scrutiny standard still applies to ETHS’s provision of racial affinity courses despite the unconvincing disclaimer in the 2023–24 course listing stating that they are “open to all students.” This disclaimer is meaningless in light of the language immediately following it, which reaffirms that these classes are intended for black and “Latinx” students, respectively. No reasonable reader could fail to understand from these descriptions that the school is attempting to create separate classes for black and Hispanic students and discourage students who identify with other racial groups from applying to these classes.

Superintendent Campbell confirms this explicitly race-based goal in his revealing comment to the ETHS student newspaper indicating that the school would only permit a white student to enroll in such a class “[i]f push came to shove” and “there’s nothing else that works.”³⁷ The superintendent’s statement is a clear signal that, despite the written policy contained in the racial affinity class descriptions indicating that each course is open to all students, the district maintains unwritten policies excluding non-black or non-Hispanic students, respectively, from these courses in all but the most unusual circumstances. This discrepancy between the 2023–24 course

³⁶ *Metro Broad. v. FCC*, 497 U.S. 547, 609–610 (O’Connor, J., dissenting), *quoted with approval in Parents Involved*, 551 U.S. at 742.

³⁷ *Supra* note 12.



descriptions and the superintendent’s comments is ripe for a thorough investigation by OCR to determine what the actual policy of ETHS is toward admitting non-black and non-Hispanic students to racial affinity classes.

Even assuming that such classes are truly open to all students, which it appears that they are not, the mere encouragement or discouragement of students of particular races to apply to a particular course section, which the 2023–24 course descriptions explicitly do, remains a racial classification that is subject to strict scrutiny. Suppose a school posted a sign above a water fountain in its hallway stating as follows: “While open to all students, this water fountain is intended to quench the thirst of black students.” Such a race-based classification would no doubt be subject to strict scrutiny under the Equal Protection Clause and would violate its anti-discrimination mandate, as well as that of Title VI. ETHS’s racial affinity classes are no different.

According to the Supreme Court’s decision in *Brown v. Board of Education*, the permissibility of such racial classifications does not depend on whether individuals of one race receive better treatment than those of another race: “To separate [children in grade and high schools] from others of similar age and qualifications solely because of their race generates a feeling of inferiority as to their status in the community that may affect their hearts and minds in a way unlikely ever to be undone.”³⁸ But in ETHS’s case, the race-based affinity classes appear to offer benefits that are not available in the school’s other English and math sections, including more teacher-to-student outreach³⁹ and even different course content based on the race or ethnicity of the students encouraged to be in the class.⁴⁰ Students who are not black or Hispanic and who are thus discouraged from enrolling (or perhaps cannot enroll) in these courses may be significantly disadvantaged because they do not have access to such intensive faculty outreach or tailored course content.

In sum, by maintaining these racial affinity classes, ETHS is classifying students based on race. Therefore, OCR should review these classes under the strict scrutiny standard as required by the Supreme Court under the Equal Protection Clause.

ETHS’s Racial Affinity Classes Cannot Survive Strict Scrutiny Review.

The Supreme Court has recognized that “remediating specific, identified instances of past discrimination that violated the Constitution or a statute” can be a compelling interest that satisfies

³⁸ *Brown v. Board of Education*, 347 U.S. at 494.

³⁹ *See supra* note 25.

⁴⁰ *See supra* notes 22, 23, 24.



strict scrutiny review.⁴¹ However, the Court has been clear that this interest does not justify racial classifications for the sake of correcting for general “societal discrimination” that does not spring from government action.⁴²

In this case, of course, ETHS is explicitly not imposing racial classifications for the purpose of alleviating the impacts of intentional discrimination. The school district’s 2023–28 goals and “Equity and Excellence Statement” cite ongoing, generalized “structural racism” and “institutional beliefs, policies, practices, and teaching that perpetuate racial disparities in achievement” as the basis for its race-based action⁴³—as opposed to specific incidents or policies targeted to disadvantage individual students on the basis of race or ethnicity. This is not the kind of intentional discrimination that justifies race-conscious government action under Supreme Court precedent.

In addition to the fact that ETHS cannot assert an interest the Supreme Court has found to be compelling to justify offering its racial affinity classes, ETHS cannot show that these racial classifications are narrowly tailored to any interests it might assert to justify them. As the Court has recognized, “[r]acial classifications are simply too pernicious to permit any but the most exact connection between justification and classification.”⁴⁴

Based on the 2023–28 district goals and ETHS’s “Equity and Excellence Statement,” the school’s justification for offering racial affinity classes appears to be improving academic outcomes for black and Hispanic students at ETHS.⁴⁵ While it is certainly commendable for a district to attempt to improve academic achievement for individual students, the Supreme Court has never recognized an interest in improving academic outcomes as sufficiently “compelling” to justify race-based classifications. And even if it did recognize such an interest as “compelling” in its strict scrutiny analysis, ETHS cannot show that offering racial affinity classes is “necessary” to achieve that interest.

For one thing, the racial affinity classes are based on blatant stereotyping among the black and Hispanic populations and on the flawed assumption that gathering students in the same room who have nothing in common but the race or ethnicity with which they identify will improve their

⁴¹ *Students for Fair Admissions*, No. 20-1199, slip op. at 15.

⁴² *Parents Involved*, 551 U.S. at 731–2 (citing *Shaw v. Hunt*, 517 U.S. 899, 909–10 (1996); *Richmond v. J. A. Croson Co.*, 488 U.S. 469, 498–9 (1989); *Wygant v. Jackson Bd. of Education*, 476 U.S. 267, 276 (1986) (plurality opinion); *id.* at 288 (O’Connor, J., concurring in part and concurring in the judgment)).

⁴³ See *supra* notes 5, 6.

⁴⁴ *Students for Fair Admissions*, No. 20-1199, slip op. at 26 (quoting *Gratz v. Bollinger*, 539 U.S. 244, 270 (2003)).

⁴⁵ See *supra* notes 5, 6.



academic outcomes. Such classifications are at least reminiscent of the wrongheaded idea, which the Court has repeatedly rejected—most recently in *SFFA*—that “minority students always (or even consistently) express some characteristic minority viewpoint on any issue.”⁴⁶ As the Court emphasized in *SFFA*, “We have time and again forcefully rejected the notion that government actors may intentionally allocate preference to those who may have little in common with one another but the color of their skin.”⁴⁷ In this case, the students who allegedly benefit from the racial classifications necessarily have nothing in common with one another except for the fact that they attend the same high school and are black or Hispanic. Separating students on this basis—even if such segregation is voluntary for the students who are intended to benefit from it—impermissibly “treat[s] individuals as the product of their race, evaluating their thoughts and efforts—their very worth as citizens—according to a criterion barred to the Government by history and the Constitution.”⁴⁸

Perhaps worse is that, according to the *Wall Street Journal*, “[t]he district hasn’t presented any analyses on whether the affinity courses have improved student outcomes.”⁴⁹ And simple common sense points to a significant danger that such classes, by sheltering enrolled students from the need to speak before or interact or learn with a diverse body of peers, will stunt these students, whether in postsecondary academics or in their later careers. Thus, there is no reason to think that ETHS’s racial affinity classes will help these students succeed academically in high school or beyond, and there is much reason to think that it demeans black and Hispanic students generally by characterizing them, unlike all other students, as in need of a “safe space” to learn that consists of people who share their race or ethnicity.

Even assuming for the sake of argument that ETHS can demonstrate any compelling interest here, its racial affinity classes are not narrowly tailored to any such interest ETHS might advance in support of the program, especially with regard to the academic achievement of students.

If ETHS’s aim is truly to help students who have fallen behind in academics due to circumstances beyond their control, the appropriate course is not to use race as a clumsy indicator of whether the student should receive more help and resources, but to provide supports tailored to each student as an individual, no matter his or her race, color, ethnicity, or national origin.

OCR Should Investigate ETHS’s 2024–25 Course Listings as an Attempt to Conceal an Unwritten Discriminatory Policy.

⁴⁶ *Students for Fair Admissions*, No. 20-1199, slip op. at 28 (quoting *Grutter*, 539 U.S. at 333).

⁴⁷ *Id.* at 29 (internal quotation marks omitted) (quoting *Shaw v. Reno*, 509 U.S. 630, 647 (1993)).

⁴⁸ *Id.* at 30 (quoting *Miller v. Johnson*, 515 U.S. 900, 912 (1995)).

⁴⁹ Randazzo & Belkin, *supra* note 16.



As noted above, perhaps recognizing the racial affinity classes' failure to comply with the Constitution and Title VI of the Civil Rights Act, ETHS has attempted to inoculate the descriptions of its racial affinity course listings for 2024–25 by stating that the classes “will emphasize examples that some individuals” in the respective racial or ethnic community “identify as shared experiences.”⁵⁰

Although neither the Equal Protection Clause nor Title VI prohibits schools from offering courses that consider such content, these descriptions simply mimic the purpose of their previous incarnations: encourage black or Hispanic students to enroll in these respective classes and discourage non-black and non-Hispanic students from enrolling in them. ETHS has already demonstrated that it maintains unwritten policies with regard to the racial affinity classes: Superintendent Campbell stated that a white student could be enrolled in one of them “if push came to shove” and “there’s nothing else that works,”⁵¹ despite the fact that these courses are publicly advertised as open to all students. Moreover, it is difficult to fathom how the racial affinity math classes—such as AP Calculus AB—could actually “emphasize examples” that would be helpful to members of the black or Hispanic communities—as if the precise calculation of derivatives and integrals depended on one’s lived experiences as one who identifies with a particular race or ethnicity. This lends credence to the argument that the course description is a transparent and constitutionally impermissible racial cue to students regarding whether they should or should not enroll in these classes.

This revision in the racial affinity course descriptions constitutes an attempt by ETHS to evade review of its program by OCR and prevent enforcement of sanctions against it while maintaining unwritten policies dedicated to continuing racial affinity classes in the same form as they have taken in recent years. Therefore, we request that OCR investigate ETHS’s written and unwritten policies with regard to its racial affinity classes.

Conclusion

ETHS has implemented a policy explicitly encouraging black and Hispanic students—but not others—to join certain racial affinity classes because of their race or ethnicity, and its superintendent has indicated that, despite course descriptions to the contrary, these classes are not actually open to all students without regard to race or ethnicity. This racially discriminatory policy, which is ongoing and appears set to continue into the 2024–25 school year, stigmatizes black and Hispanic students by characterizing them as unable to succeed in a diverse environment. It

⁵⁰ *Supra* note 13.

⁵¹ *Supra* note 12.



disadvantages students who are not black or Hispanic by excluding them from certain courses intended to provide distinct advantages on their participants. It constitutes an impermissible racial classification in violation of the Equal Protection Clause and Title VI.

Accordingly, DFI urges OCR to investigate the allegations in this complaint and ensure that ETHS complies with Title VI of the Civil Rights Act of 1964, as well as provide other appropriate relief.

Thank you for your prompt assistance. Please feel free to contact us with any questions related to this request.

Sincerely,

/s/ Paul Zimmerman

Paul Zimmerman

Policy Counsel

Defense of Freedom Institute for Policy Studies