



Kansas

PO Box 13048
Overland Park, KS 66282
(913) 490-4100
aclukansas.org

Brandi Fisher
President

Sandy Brown
Vice President

Micah W. Kubic, Ph.D.
Executive Director

Brad Stuewe, M.D.
Treasurer

Marie Woodbury
Secretary

Joy Springfield
National Board Representative

Karla Juarez
Equity and Inclusion Officer

Marquetta Atkins
Amii Castle
Trent Davis
Liz Hueben
Usha Rafferty
Annie Tietze
Van Williams
Board of Directors

VIA U.S. MAIL & EMAIL

Mr. Todd Ferguson,
Superintendent
Members of the Board of
Education
Girard Schools USD 248
415 North Summit Street
Girard, KS 66743
tferguson@girard248.org
bmein@girard248.org

Ms. Tina Daniel, Principal
Ms. Jodi Benso, Assistant
Principal
R.V. Haderlein Elementary School
520 West Prairie Street
Girard, KS 66743
tdaniel@girard248.org
jbenso@girard248.org

November 17, 2023

Re: Unlawful denial of accommodation for Native American student’s long hair

Dear Superintendent Ferguson, Board of Education Members, Principal Daniel, and Assistant Principal Benso:

We write on behalf of ██████████, a Native American 8-year-old attending R.V. Haderlein Elementary School (the “School” or “Haderlein”). We are gravely concerned that school officials have demanded that ██████ cut his hair in violation of his religious and cultural beliefs. Based on our investigation, Haderlein’s rule that boys (and only boys) wear their hair short violates ██████ rights under the Kansas Preservation of Religious Freedom Act, the U.S. Constitution, Title IX of the Education Amendments of 1972, and Title VI of the Civil Rights Act of 1964.

We strongly urge you to immediately grant ██████ an accommodation that allows him to grow and wear his hair past his shoulders, loose or in a braid, as his tribal and religious customs dictate.

I. Factual Background

██████ is a member of the Wyandotte Nation, a federally recognized Native American Tribe based in Wyandotte, Oklahoma. He is listed on the Tribal roll and has documentation to that effect. The Wyandotte Nation’s hair traditions resemble the traditions of many other Native American tribes. For spiritual and cultural reasons, many Wyandotte men cut their hair only when mourning the loss of a loved one. After seeing other male members wear their hair long last summer at the Nation’s annual Gathering of the Little Turtles,¹ ██████ was inspired to adopt the same religious and cultural practice. As

¹ The Gathering of the Little Turtles is a Wyandotte Nation youth event that honors the Tribe’s ancient belief that the world was created on the back of a snapping turtle.



with many other Wyandotte men who wear their hair long, ■ practice honors his Native American ancestry and expresses his spiritual identity.

a. Haderlein Requires Boys to Wear Short Hair.

As part of Haderlein’s student dress code, the “Boy’s Hair Length” policy in the 2023-2024 Student Handbook states:

Hair is not to touch the collar of a crew neck t-shirt, cover the eyebrows, or extend below the earlobes. Ponytails, rat tails, or any other style that would circumvent the policy are not permitted.²

There is no “Hair Length Policy” for girls and no requirement that girls cut or wear their hair in accordance with a specified length. According to the Handbook, “[s]tudents whose appearance is disruptive or extreme will be requested to make the necessary adjustments, as determined by the principal.”³ A student who violates school policy may be sent to the principal’s office for “disciplinary consequences,” which may include a conference with the principal, time out, referral to a counselor, a call to parents, contact with a school resource officer, detention, or suspension.⁴

b. ■ Must Cut His Hair to Stay in School.

As we understand it, ■ was told by school officials in August 2023 that he needed to cut his hair to comply with the Haderlein dress code. As a result, ■ mother, ■ visited the school in early September 2023 and requested an exemption for ■ because of his Native American heritage and spiritual beliefs. ■ offered to show documentation to demonstrate that ■ was listed on the Wyandotte Nation Tribal roll, but she was informed that there were no exemptions for the hair policy as it applied to ■

On Friday, September 22, 2023, Haderlein’s Assistant Principal, Joni Benso, emailed ■ mother, stating:

Mrs. Daniel and I spoke to ■ yesterday about his hair. You and I talked a couple weeks ago about getting it cut. According to policy, Mrs. Daniel has asked that his hair be cut by Monday or he will be sent home. I know you had concerns about our policy and we talked through this recently, but if you would like to visit further with [the superintendent] Mr.

² *R.V. Haderlein Elementary Student Handbook 2023-2024*, Girard Schools USD 248, p. 4 of PDF, <https://www.girard248.org/vimages/shared/vnews/stories/540b0d8a6a3ce/2023-24%20Student%20Handbook.pdf>.

³ *Id.*

⁴ *Id.* at p. 6 of PDF.

Ferguson, you're welcome to call him at [phone number redacted].

Based on the language of the email, ██████ believed that ██████ would be sent home from school every day until he complied and that, if she refused to cut his hair, ██████ would ultimately be suspended. We understand that ██████ immediately and repeatedly tried to call Superintendent Ferguson and left him voicemails, but he failed to return her calls. Ultimately, to ensure that ██████ would be able to continue attending school, rather than being “sent home” or facing other punishment, he was forced to cut his hair over the weekend of September 22, 2023. Because ██████ has made the decision to wear his hair long in accordance with his Native American spiritual and cultural tradition, cutting his hair in this manner caused him distress.



II. Legal Concerns

Haderlein’s discriminatory “Boy’s Hair Length” policy appears to violate the Kansas Preservation of Religious Freedom Act, the Fourteenth Amendment to the U.S. Constitution, Title IX of the Education Amendments of 1972 (“Title IX”), and Title VI of the Civil Rights Act of 1964 (“Title VI”), among other civil-rights protections.

a. The School’s Refusal to Accommodate ██████ Long Hair Violates His Religious-Freedom Rights.

Under Kansas law, the government, including public schools, “shall not substantially burden a person’s civil right to exercise of religion even if the burden results from a rule of general applicability” unless it “demonstrates, by clear and convincing evidence, that application of the burden . . . [i]s in furtherance of a compelling governmental interest . . . [and] is the least restrictive means of furthering that compelling governmental interest.”⁵ This legal standard—often called “strict scrutiny”—is “rigorous” and sets a high bar that is not easily overcome by school officials.⁶

Here, ██████ sincere belief in wearing his hair long, in accordance with Native American spiritual practices, constitutes the very type of religious exercise afforded heightened legal protections under statutes like the KPRFA.⁷ Requiring him to cut his hair to attend school imposes a substantial

⁵ Kan. Preservation of Religious Freedom Act (“KPRFA”), Kan. Stat. Ann. § 60-5303 (2013).

⁶ See *Holt v. Hobbs*, 574 U.S. 352, 364 (2015) (applying identical legal test under the federal Religious Land Use and Institutionalized Persons Act).

⁷ Courts have repeatedly recognized that some Native American peoples keep their hair long as a tenet of their sincere religious beliefs. See, e.g., *A.A. ex rel. Betenbaugh v. Needville Indep. Sch. Dist.*, 611 F.3d 248, 262 (5th Cir. 2010) (holding, under state religious-freedom statute, that Native American kindergartener demonstrated a sincere religious belief in not cutting his hair and wearing it “uncovered—visibly long”); *Warsoldier v. Woodford*, 418 F.3d 989, 991-92 (9th Cir. 2005) (“One tenet of Warsoldier’s [sincere] religious faith teaches that

burden on his faith practice because, in and of itself, it violates his religious beliefs, and because it also prevents him from wearing his hair long outside of school, including for religious rituals and events, such as the Gathering of the Little Turtles. Indeed, *any effort* to pressure ■ to cut his hair or wear it in a manner that conflicts with his religious beliefs—whether by holding a conference with the principal, putting him in time out, referring him to a counselor, calling his parents, contacting the school resource officer, assigning him detention, sending him home, or suspending him—would substantially impede his religious exercise.⁸

Applying a Texas religious-freedom statute identical to the KPRFA, one federal court of appeals has held that merely requiring a Native American kindergartener to “confine his hair to a bun or to a braid tucked behind his shirt,” despite his religious belief that it should be worn visibly long and uncovered, resulted in a substantial burden on the student’s religious exercise.⁹ Although the Texas school district argued that the policy was necessary to create uniformity among students and “to teach hygiene, instill discipline, prevent disruption, avoid safety hazards, and assert authority,” the court held that, in the school context, none of these “generalized interests” met the “compelling interest” requirement of the Texas religious-freedom law.¹⁰ And, as the court pointed out, all of the district’s justifications for denying the kindergartner a religious accommodation were completely undercut by its “decision to permit *girls* to wear their hair visibly long”:

The District has not shown that girls with long hair are less prone to accidents or that they are better able to conform with the District’s hygienic standards. Nor does the District explain why any gender confusion issues associated with A.A.’s long

hair symbolizes and embodies the knowledge a person acquires during a lifetime and that hair may be cut only upon the death of a close relative. In keeping with his religion, Warsoldier maintains his hair long because he believes that cutting his hair would cost him his wisdom and strength. He further believes that if he were to cut his hair, he would be unable to join his ancestors in the afterlife and that instead, the deceased members of his tribe will subject him to taunting and ridicule.”); *cf., e.g., Teterud v. Burns*, 522 F.2d 357, 359-61 (8th Cir. 1975) (holding that “wearing of long braided hair” is “a tenet of the Indian religion” and that Native American prisoner’s sincere religious beliefs prohibited him from cutting his hair); *Ala. & Coushatta Tribes of Tex. v. Trustees of Big Sandy Indep. Sch. Dist.*, 817 F. Supp. 1319, 1326 (E.D. Tex. 1993) (recognizing that “the minor members of the Tribe have a sincerely held religious belief in the spiritual properties of wearing the hair long”).

⁸ *See Warsoldier*, 418 F.3d at 996 (holding that grooming policy subjecting Native American prisoner to various punishments “intentionally puts significant pressure on inmates . . . to abandon their religious beliefs by cutting their hair” and “imposes a substantial burden” on their religious practices).

⁹ *Betenbaugh*, 611 F.3d at 264-66, 268 (explaining that, had the school’s policy required the student to cut his hair, it would have amounted to “a total ban of [religious] conduct” because it “would limit his free exercise at all times,” even at home and outside of school).

¹⁰ *Id.* at 266-72.



hair would not also be true for a girl who chose to wear her hair short, as the grooming policy allows. At the same time, the District’s decision to allow some girls to wear short hair is a judgment call that undoubtedly undermines any interest in fostering a uniform appearance through its policy. That the District itself contemplates secular, gender-based exceptions indicates that none of the generalized interests purportedly advanced through the grooming policy should carry determinative weight . . . More to the point, it makes plain that is non-conforming appearance evincing resistance to school authority that justifies the District’s grooming policy; that it misses the mark to turn that code to dress and hair conceded to be born of sincere religious belief.¹¹

As in the Texas case, Haderlein has no compelling interest in denying ■ a religious accommodation to wear his hair long. On the contrary, as discussed below, the “Boy’s Hair Length” policy is facially invalid under several provisions of federal law, and the state has no legitimate—let alone compelling—interest in enforcing an otherwise unlawful policy. Moreover, even if such an interest did exist, Haderlein would still be required under the KPFRA to demonstrate, “by clear and convincing evidence,” that denying ■ the right to wear his hair long is the “least restrictive means of furthering that compelling governmental interest.”¹²

This prong of the strict-scrutiny test is “exceptionally demanding” and requires the government to show that “it lacks other means of achieving its desired goal without imposing a substantial burden on the exercise of religion.”¹³ Given that school policy does not regulate girls’ hair length at all and is, therefore, substantially underinclusive,¹⁴ and that many other public schools across Kansas successfully operate without limiting boys’ hair length,¹⁵ Haderlein simply cannot meet this standard. The KPFRA’s robust

¹¹ *Id.* at 271-72 (internal quotation marks and citations omitted).

¹² Kan. Stat. Ann. § 60-5303(a).

¹³ *Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682, 728 (2014) (applying legal test identical to the KPFRA).

¹⁴ *See, e.g., Holt*, 574 U.S. at 367-68 (holding that, where the government’s “proffered objectives are not pursued with respect to analogous nonreligious conduct,” . . . [it] suggests that “those interests could be achieved by narrower . . . [rules] that burden[] religion to a far lesser degree.”) (quoting *Church of Lukumi Babalu Aye, Inc. v. Hialeah*, 508 U.S. 520, 546, (1993)).

¹⁵ *See, e.g., id.* at 368-69 (“While not necessarily controlling [under strict scrutiny], the policies followed at other well-run institutions would be relevant to a determination of the need for a particular type of restriction. . . . That so many other prisons allow inmates to grow beards while ensuring prison safety and security suggests that the Department could satisfy its security concerns through a means less restrictive than denying petitioner the exemption he seeks.”) (internal quotation marks and citation omitted).

legal protections for religious exercise demand that school officials accommodate ■ Native American practice and, going forward, refrain from pressuring him to cut his hair by imposing or threatening punishment of any kind.

b. The School’s Prohibition on Boys, But Not Girls, Having Long Hair Constitutes Sex Discrimination.

A dress code based on sex stereotypes sends a damaging message to boys that they cannot be feminine in any way, and this message harms all students by promoting rigid views of gender norms and roles. It is also unlawful. Schools may not impose different requirements on students based on their sex without an exceedingly persuasive justification. Nor may they rely on gender stereotypes when creating and enforcing dress-code policies. Haderlein’s hair-length policy does just that.

It is well established that, under the Equal Protection Clause of the Fourteenth Amendment to the U.S. Constitution, all sex-based classifications—including school dress codes—are subject to a legal standard of review known as “intermediate scrutiny,” meaning that school officials “must show at least that the challenged classification serves important governmental objectives and that the discriminatory means employed are substantially related to the achievement of those objectives.”¹⁶

Moreover, the Equal Protection Clause prohibits school officials from treating students differently based on sex stereotypes or “overbroad generalizations about the different talents, capacities, or preferences of males and females.”¹⁷ And schools may not force students to conform to such stereotypes.¹⁸ Accordingly, a “rationale based on impermissible gender stereotypes” cannot itself be an “important governmental interest.”¹⁹

¹⁶ *United States v. Virginia*, 518 U.S. 515, 533 (1996) (internal quotation marks omitted); *Peltier v. Charter Day Sch., Inc.*, 37 F.4th 104, 124-25 (4th Cir. 2022) (en banc), cert. denied 143 S. Ct. 2657 (2023) (holding that requirement that girls wear a skirt, jumper, or skort, while allowing boys to wear shorts or pants violated the Equal Protection Clause); *Hayden ex rel. A.H. v. Greensburg Cmty. Sch. Corp.*, 743 F.3d 569, 583 (7th Cir. 2014) (requiring male athletes to have short hair discriminated on the basis of sex in violation of the Equal Protection Clause and Title IX); *Arnold v. Barbers Hill Indep. Sch. Dist.*, 479 F. Supp. 3d 511, 520-21 (S.D. Tex. 2020) (hair-length policy that required only male students to keep their hair short likely violated the Equal Protection Clause).

¹⁷ See *Virginia*, 518 U.S. at 533.

¹⁸ See, e.g., *Grimm v. Gloucester Cty. Sch. Bd.*, 972 F.3d 586, 608-09 (4th Cir. 2020), cert. denied, 141 S. Ct. 2878 (2021) (collecting cases); *Whitaker By Whitaker v. Kenosha Unified Sch. Dist. No. 1 Bd. of Educ.*, 858 F.3d 1034, 1051-52 (7th Cir. 2017) (holding that policy disciplining transgender students for using a bathroom that did not conform their sex assigned at birth violated Equal Protection Clause).

¹⁹ *Peltier*, 37 F.4th at 124-26; cf. *J.E.B. v. Alabama ex rel. T.B.*, 511 U.S. 127, 138 (1994) (rejecting “the very stereotype the law condemns” as a justification for a state’s sex-based policy (citation omitted)); *Adams By & Through Adams v. Baker*, 919 F. Supp. 1496, 1504





The Boy’s Hair Length policy runs afoul of this legal standard: It makes a facial, sex-based distinction by imposing a restriction on boys that is not imposed on girls, but does not serve, and is not substantially related to, an important governmental objective. Indeed, in this context, there is no justification for such a rule that could overcome intermediate scrutiny. Hair rules that apply only to boys impose antiquated notions of masculinity and femininity.²⁰ Federal courts have, therefore, held that public schools’ sex-based hair policies are unlawful.²¹

Furthermore, as a recipient of federal funds, Haderlein is covered by Title IX, which prohibits differential treatment of students based on sex.²² As a federal court of appeals recently explained, “Title IX unambiguously encompasses sex-based dress codes promulgated by covered entities.” *Peltier*, 37 F.4th at 128. And the U.S. Department of Education and the U.S. Department of Justice remain committed to enforcing this statutory prohibition against discriminatory dress and grooming policies.²³

Here, the Boy’s Hair Length policy, under which Haderlein threatened to punish ■ applies to him only because he is a boy. He is treated worse than similarly situated female students; while girls may have long hair and attend school without the threat of discipline, ■ may not. Haderlein wrote that ■ violation of the Boy’s Hair Length policy would cause the school to send him home, thus forcing ■ to miss out on educational opportunities, unless he cut his long hair and abandoned a deeply held part of his identity, culture, and religion. Accordingly, “on the basis of sex” alone, Haderlein is “exclud[ing] ■ from participation in” an “education program . . . receiving Federal financial assistance,” in violation of Title IX.²⁴

c. The School’s Requirement that ■ Cut His Hair Likely Violates Title VI of the Civil Rights Act.

Title VI of the Civil Rights Act of 1964 prohibits both intentional and disparate-impact discrimination on the basis of race, color, or national origin

(D. Kan. 1996) (rejecting student safety as a justification for a school’s sex-based wrestling program where only evidence was “generalized assumptions about the differences between males and females regarding physical strength”).

²⁰ See *Richards v. Thurston*, 424 F.2d 1281, 1286 (1st Cir. 1970) (“We see no inherent reason why decency, decorum, or good conduct requires a boy to wear his hair short.”).

²¹ See *id.*; see also *Hayden ex rel. A.H.*, 743 F.3d at 583 (“[T]he hair-length policy applicable to [only] boys wishing to play basketball impermissibly discriminates based on sex.”); *Arnold*, 479 F. Supp. 3d at 515 (granting preliminary injunction against hair-length policy that required only male students to keep their hair short).

²² 20 U.S.C. § 1681(a); see also 34 C.F.R. §§ 106.31(a), (b)(4).

²³ See, e.g., United States’ Statement of Interest at 13, *Arnold*, 4:20-cv-01802 (S.D. Tex. July 23, 2021) (ECF No. 155) <https://www.justice.gov/crt/case-document/file/1419201/download>.

²⁴ See 20 U.S.C. § 1681(a).

in any program or activity receiving federal financial assistance.²⁵ As recently explained by the U.S. Department of Education, under Title VI, “[s]chools that receive federal financial assistance have a responsibility to address discrimination against Jewish, Muslim, Sikh, Hindu, Christian, and Buddhist students, or those of another religious group . . . when the discrimination is based on a student’s skin color, physical features, or style of dress that reflects both ethnic and religious traditions.”²⁶ The Department, which has enforcement power under Title VI, has made clear that it “does not tolerate,” and will not hesitate to investigate “race or national origin harassment commingled with aspects of religious discrimination[.]”²⁷

Title VI recognizes that “even benignly-motivated policies that appear neutral on their face may be traceable to the nation’s long history of invidious race discrimination in employment, education, housing, and many other areas.”²⁸ Thus, one goal of the statute is to eliminate policies and practices that have the effect of discriminating unless “they are shown to be necessary to the program’s operation and there is no less discriminatory alternative.”²⁹

Here, even though Haderlein’s Boy’s Hair Length Policy is, on its face, racially and religiously neutral, school policies that restrict Native American boys from wearing long hair can subject these students to significant adversity and harm. These present-day harms cannot be fully understood unless they are placed into the historical context of the multifaceted efforts to separate Native American children from their families and tribes and to deny them their rights of cultural and religious expression.

Beginning with the Indian Civilization Act of 1819 and running through the 1960s, the United States enacted laws and

²⁵ 42 U.S.C. § 2000d *et seq.*

²⁶ Catherine E. Lhamon, *Dear Colleague Letter: Discrimination, including Harassment, Based on Shared Ancestry or Ethnic Characteristics*, U.S. Dep’t of Educ. Off. for Civ. Rts., 2 (Nov. 7, 2023), https://www2.ed.gov/about/offices/list/ocr/letters/colleague-202311-discrimination-harassment-shared-ancestry.pdf?utm_content=&utm_medium=email&utm_name=&utm_source=govdelivery&utm_term=. *Accord* U.S. Dep’t of Educ., Off. for Civ. Rts., *Fact Sheet: Protecting Students from Discrimination Based on Shared Ancestry or Ethnic Characteristics*, 1 (Jan. 2023), <https://www2.ed.gov/about/offices/list/ocr/docs/ocr-factsheet-shared-ancestry-202301.pdf> (“Title VI prohibits discrimination based on race, color, or national origin against students of any religion . . . when the discrimination, for example, involves . . . how a student looks, including skin color, physical features, or style of dress that reflects both ethnic and religious traditions[.]”).

²⁷ Kenneth L. Marcus, *Dear Colleague Letter: Title VI and Title IX Religious Discrimination in Schools and Colleges*, U.S. Dep’t of Educ., Off. for Civ. Rts. (Sept. 13, 2004), <http://www2.ed.gov/about/offices/list/ocr/religious-rights2004.html>.

²⁸ Title VI Legal Manual, *Section VII: Proving Discrimination—Disparate Impact*, Dep’t of Just., <https://www.justice.gov/crt/fcs/T6Manual7> (last visited Nov. 15, 2023).

²⁹ *Id.* (internal quotation marks omitted).

implemented policies establishing and supporting Indian boarding schools across the Nation. During that time, the purpose of Indian boarding schools was to culturally assimilate Indigenous children by forcibly relocating them from their families and communities to distant residential facilities where their American Indian, Alaska Native, and Native Hawaiian identities, languages, and beliefs were to be forcibly suppressed.³⁰

As Justice Gorsuch recently explained, Indian boarding schools, “[u]pon the children’s arrival, . . . would often seek to strip them of nearly every aspect of their identity,” including, “cut[ing] their hair—a point of shame in many native communities.”³¹

Because many Native American people have a special and specific cultural and religious belief pertaining to wearing long hair, a policy that prohibits this practice, even if race-neutral and religion-neutral, is likely to disproportionately impact Native American students, such as ■ when compared to non-Native American students. As a result, these students suffer cultural, psychological, and spiritual trauma in the educational context and beyond. Under Title VI, to maintain a policy that disproportionately impacts students like ■ Haderlein must demonstrate that both the Boy’s Hair Length policy, and denying any exemption from it, are necessary to achieving a goal that is legitimate, important, and integral to the school’s institutional mission.³² This it cannot do. Any justification offered in defense of the policy is undermined by the fact that the policy does not apply to *all* students across the board. And, as discussed above, Haderlein has no legitimate interest in enforcing a policy that otherwise violates both state and federal law.

III. Conclusion

By prohibiting hairstyles for boys that are allowed for girls, and by refusing to grant ■ an accommodation for his religious and cultural practice of wearing his hair long, Haderlein appears to be violating both federal and

³⁰ Deb Haaland, *Memo from the Sec. of the Interior Regarding Federal Indian Boarding School Initiative*, 1 (June 22, 2021), 3, <https://www.doi.gov/sites/doi.gov/files/secint-memo-esb46-01914-federal-indian-boarding-school-truth-initiative-2021-06-22-final508-1.pdf> (“Over the course of the Program, thousands of Indigenous children were removed from their homes and placed in Federal boarding schools across the country. Many who survived the ordeal returned home changed in unimaginable ways, and their experiences still resonate across the generations.”).

³¹ *Haaland v. Brackeen*, 143 S. Ct. 1609, 1643 (2023) (Gorsuch, J., concurring); see also Bryan Newland, *Federal Indian Boarding School Initiative Investigative Report*, U.S. Dep’t of the Interior (May 2022), https://www.bia.gov/sites/default/files/dup/inline-files/bsi_investigative_report_may_2022_508.pdf.

³² See Title VI Manual, *supra* n.28. Any justification proffered by the school “must be supported by evidence and may not be hypothetical or speculative.” *Id.*

state law. Because the Boy's Hair Length Policy is facially unlawful, we also urge you to reevaluate and rescind the policy in its entirety. In the meantime, we urge you to *immediately* grant ■ an accommodation allowing him to wear his hair below his shoulders in accordance with his cultural and religious traditions. Please let us know by December 1, 2023, whether you intend to comply with this request.



Sincerely,
Sharon Brett
Legal Director
ACLU of Kansas
sbrett@aclukansas.org

Heather L. Weaver
Senior Staff Attorney
ACLU Program on Freedom of
Religion and Belief
hweaver@aclu.org

Jnessa Calvo-Friedman
Staff Attorney
ACLU Women's Rights Project
jcalvo-friedman@aclu.org

cc:

Mr. Henry Ashbacher, hashbacherbm@girard248.org
Mr. Roger Breneman, rbrenemanbm@girard248.org
Mr. Aaron Coester, acoesterbm@girard248.org
Mr. David Goble, dgoblebm@girard248.org
Mrs. Lori Johnson, ljohnsonbm@girard248.org
Mrs. Peggy Marshall, pmarshallbm@girard248.org
Ms. Kelly Peak, kpeakbm@girard248.org