

SUPREME COURT
OF WISCONSIN

Appeal Case No. 2017AP1240

JOHN McADAMS,
Plaintiff-Appellant-Petitioner

-vs.-

MARQUETTE UNIVERSITY,
Defendant-Appellee-Respondent

**AMICUS CURIAE BRIEF IN SUPPORT OF
PLAINTIFF—APPELLANT-PETITIONER
JOHN McADAMS' PETITION TO BYPASS**

Respectfully submitted by:

Daniel M. Adams, SBN 107564
ADAMS LAW GROUP LLC
1200 East Capitol Drive, Suite 360
Milwaukee, Wisconsin 53211
T: 414.921.1945
F: 414.921.1946
Dan@DefenseWisconsin.com
www.DefenseWisconsin.com

Alexandria Morey, SBN 1089462
FOUNDATION FOR INDIVIDUAL
RIGHTS IN EDUCATION (FIRE)
777 North Capitol Street NE, Suite 802
Washington, D.C. 20002
T: 215.717.3473
F:215.717.3440
Alex@TheFire.org
www.TheFire.org

Attorneys for Foundation for Individual Rights in
Education (FIRE)

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STATEMENT OF INTEREST OF *AMICUS CURIAE*

The Foundation for Individual Rights in Education (“FIRE”) is a nonpartisan, nonprofit, tax-exempt education and civil liberties organization dedicated to defending student and faculty rights at our nation’s institutions of higher education. Since its founding in 1999, FIRE has successfully defended fundamental liberties including freedom of speech, legal equality, due process, religious liberty, and sanctity of conscience on behalf of students and faculty nationwide. FIRE believes that if our nation’s universities are to effectively prepare students for success in our democracy, the law must remain clearly on the side of student and faculty rights. We respectfully submit this brief in furtherance of that mission.

FIRE has a significant interest in the petition for bypass before this Court because the lower court’s decision, if allowed to stand, will have a significant impact on American higher education. The lower court’s ruling significantly compromises faculty members’ free speech and academic freedom rights at a critical juncture, so a correction from the Court that protects faculty rights and further develops the law in this area is needed. Because FIRE defends faculty from threats to academic freedom on a daily basis, we know faculty and administrators nationwide will closely watch this Court’s decision.

SUMMARY OF ARGUMENT

The lower court's ruling threatens professors' free speech and academic freedom rights. While this case may, at first blush, seem to present a relatively narrow contract dispute between a private religious university and a tenured member of its faculty, the core dispute between Professor John McAdams and Marquette University must be viewed in the broader context in which it arose. Around the country, the free speech and academic freedom rights of faculty are being eroded by students, administrators, and members of the general public demanding censorship and by administrations caving to those demands. This capitulation is to the serious detriment of American higher education and ultimately the health of our democracy.

If a faculty member is not free to criticize, even publicly, the pedagogy of a fellow instructor, or to respond in kind to his or her critics, important institutional dialogues about teaching, scholarship, politics, and more will be deeply chilled. Faculty already report being reluctant to speak out and even to teach about sensitive issues for fear of professional repercussions. If the lower court's ruling stands, the increasing chill on faculty expression will only intrude further as administrators around the country seize on the decision to justify disciplining faculty for public dissent on topics both internal and external to the university.

Indeed, *amicus* FIRE's case archives are replete with recent examples of faculty who have faced discipline and termination for their public expressions of opinion on controversial issues, and new calls for censorship are happening on a near-daily basis. FIRE urges this Court to act to protect free speech and academic freedom before these crucial rights are irrevocably lost.

I. Introduction

American higher education is at a critical juncture. In recent years, faculty have increasingly faced investigation, discipline, and even termination both for speaking about matters of public concern and for classroom speech wholly germane to the subjects they are teaching. This trend is already having a significant chilling effect on professors' willingness to address challenging issues with students and to contribute to the broader national discourse on important topics. *See, e.g.,* Jeannie Suk Gersen, *The Trouble with Teaching Rape Law*, NEW YORKER, Dec. 15, 2014, *available at* <https://www.newyorker.com/news/news-desk/trouble-teaching-rape-law>; Edward Schlosser, *I'm a Liberal Professor, and My Liberal Students Terrify Me*, VOX, June 3, 2015, <https://www.vox.com/2015/6/3/8706323/college-professor-afraid>.

Universities' internal disciplinary decisions have gone terribly awry in recent years. Too often, these decisions are informed less by genuine pedagogical concerns and more by a desire to protect the "brand" of the increasingly corporatized university by kowtowing to the demands of students and others who believe they should have the right to decide what is and is not taught — and how things are and are not taught — at our colleges and universities. *See, e.g.,* David Schultz, *The Rise and Coming Demise of the Corporate University*, ACADEME, Sept.–Oct. 2015, *available at* <https://www.aaup.org/article/rise-and-coming-demise-corporate-university> ("The defining characteristic of higher education in the last forty years has been its corporatization, which has transformed the university from an educational community with shared governance into a top-down bureaucracy that is increasingly managed and

operated like a traditional profit-seeking corporation.”); *see also, e.g.*, Samantha Harris, *Are Universities Abdicating Their Responsibility to Educate Students for Fear of Offending Them?*, FIRE NEWSDESK, Nov. 10, 2017, <https://www.thefire.org/are-universities-abdicating-their-responsibility-to-educate-students-for-fear-of-offending-them>.

To ensure the survival of the American academy as a true marketplace of ideas, courts must take a critical look at how universities and faculty bodies handle claims against professors stemming from their expressive activity. The Supreme Court of the United States has long held that professorial academic freedom “is of transcendent value to all of us and not merely to the teachers concerned.” *Keyishian v. Bd. of Regents*, 385 U.S. 589, 603 (1967). It is a principle that “[o]ur Nation is deeply committed to safeguarding,” *id.*, and upon which universities “should be extremely reticent to tread.” *Sweezy v. New Hampshire*, 354 U.S. 234, 250 (1957). In a decision vacating the conviction of professors for refusing to answer questions about alleged Communist ties during the Red Scare, the Court extolled the profound importance of academic freedom:

To impose any strait jacket upon the intellectual leaders in our colleges and universities would imperil the future of our Nation. . . . Scholarship cannot flourish in an atmosphere of suspicion and distrust. Teachers and students must always remain free to inquire, to study and to evaluate, to gain new maturity and understanding; otherwise our civilization will stagnate and die.

Id. This Court has also recognized the protections of academic freedom. *See State ex rel. Ball v. McPhee*, 6 Wis. 2d 190, 204, 94 N.W.2d 711, 719 (1959) (overturned on other grounds) (observing that professor is “entitled to some academic freedom in criticizing school programs with which he is in disagreement” and that “[s]uch acts of criticism do not qualify as either inefficiency or bad behavior”).

Echoing this national commitment to academic freedom, Marquette vows to protect the “the full and free enjoyment of legitimate personal or academic freedoms of thought, doctrine, discourse, association, advocacy, or action” — a promise bolstered by the assurance that “dismissal will not be used to restrain faculty members in their exercise of academic freedom or other rights guaranteed by the United States Constitution.”

Handbook for Full-Time Faculty, Marquette Univ. (Aug. 27, 2013), available at http://www.marquette.edu/provost/_includes/documents/FacultyhandbookupdatedOctober102315numbered.pdf. This Court should grant review to hold Marquette true to its word.

II. The lower court’s ruling threatens free speech and academic freedom

The lower court’s ruling threatens free speech and academic freedom by sanctioning the termination of a tenured professor simply for publicly criticizing what he believed to be dangerous pedagogical practices.

The lower court correctly recognizes that “[a]cademic freedom allows both faculty members and students to engage in intellectual debate without fear of censorship or retaliation and it establishes a faculty member’s right to remain true to his or her pedagogical philosophy and intellectual commitments.” *McAdams v. Marquette Univ.*, No. 16-cv-003396, at 24 (Wis. Cir. Ct. May 4, 2017). But despite seeming to grasp academic freedom’s crucial importance, the court dramatically undermines its utility by finding that criticizing a graduate student instructor by name in extramural writing is “professional misconduct” — indeed, a violation of the “protection against harassment and criticism” from faculty members to which graduate students are “entitled.” *Id.* at 25.

This broad limitation upon what faculty may say, both professionally and as citizens, is flatly incompatible with the lower court's own understanding of academic freedom. How may a faculty member "engage in intellectual debate without fear of censorship or retaliation" if, by naming the proponent of an opposing view, he or she risks sanction? How might a faculty member "remain true to his or her pedagogical philosophy and intellectual commitments" if he or she is prohibited from rebutting critics by name? If termination is an acceptable consequence of the heated debate and sharp-elbowed public criticism that pedagogical dispute may spark, then academic freedom is a dead letter.

The lower court attempts to justify McAdams' punishment by arguing that his blog post violated the graduate student's rights. "In short," the court argues, "academic freedom gives a professor, such as Dr. McAdams, the right to express his views in speeches, writings and on the internet, so long as he does not infringe on the rights of others." *McAdams, supra*, at 25. But the court fails to explain exactly how publicly criticizing a graduate student's performance as an instructor "infringe[s]" upon his or her rights. As FIRE explained to Marquette University President Michael R. Lovell:

If criticism of the ideas proposed, and pedagogical choices made, by fellow instructors in this context are not protected by Marquette's seemingly robust promises of academic freedom, then it is not clear what is. While in its public statements Marquette professes that "all of our graduate student teaching assistants are students first," the fact is that teaching and its associated public responsibilities are a pillar of doctoral studies and that they inevitably introduce the possibility of having one's teaching methods critiqued, perhaps publicly. Of course, graduate instructors in such positions enjoy the same rights of free speech and academic freedom to defend their ideas and pedagogical choices against such criticisms as their faculty peers.

Letter from Peter Bonilla, Dir., Individual Rights Def. Program, Found. for Individual Rights in Educ., to Michael Lovell, President, Marquette Univ., Jan. 30, 2015, *available at* <https://www.thefire.org/fire-letter-marquette-university>.

Like Marquette during its disciplinary proceedings, the lower court fails to satisfactorily explain why McAdams may be punished, and his academic freedom abridged, because of the actions of others over whom he had no control. McAdams' criticism was not incitement; it was neither "directed to inciting or producing imminent lawless action" nor "likely to incite or produce such action." *Brandenburg v. Ohio*, 395 U.S. 444, 447 (1969). He cannot fairly be held responsible for whatever those who read his blog entry may have communicated to the graduate student. If others unlawfully threatened or harassed the graduate student McAdams criticized, any proper remedy lies against them. Holding otherwise leaves faculty in the impossible position of being professionally liable for the unlawful actions of independent and unknown third parties.

While this case may seem like a narrow state-law contract dispute between a private university and its employee, this Court's decision will have far-reaching consequences beyond Marquette University and the state of Wisconsin. Indeed, national media outlets have closely followed the dispute. *See, e.g.*, Peter Schmidt, *Judge Rules Against Marquette Professor over Public Rebuke of TA*, CHRON. OF HIGHER EDUC., May 4, 2017, *available at* <http://www.chronicle.com/blogs/ticker/judge-rules-against-marquette-professor-over-public-rebuke-of-ta/118220>; Dennis Byrne, *Marquette Muzzle*, WKLY. STANDARD, May 2, 2016, *available at* <http://www.weeklystandard.com/marquette-muzzle/article/2002072>; Diana Sroka Rickert, *The Marquette Professor Who Dared to Speak Out*, CHI. TRIB., Apr. 11, 2016,

available at <http://www.chicagotribune.com/news/opinion/commentary/ct-mcadams-marquette-speech-campus-perspec-0413-jm-20160411-story.html>; *Punished for Blogging at Marquette*, WALL ST. J., Apr. 8, 2016, available at <https://www.wsj.com/articles/punished-for-blogging-at-marquette-1460071026>; Conor Friedersdorf, *Stripping a Professor of Tenure over a Blog Post*, ATLANTIC, Feb. 9, 2015, available at <https://www.theatlantic.com/education/archive/2015/02/stripping-a-professor-of-tenure-over-a-blog-post/385280>; Todd Starnes, *Catholic University Marquette Suspends Professor over Anti-Gay Marriage Controversy*, FOX NEWS, Dec. 19, 2014, available at <http://www.foxnews.com/opinion/2014/12/19/catholic-university-marquette-suspends-professor-over-anti-gay-marriage.html>; Eugene Volokh, *Marquette Suspends Prof's Teaching, Orders Him Off Campus*, WASH. POST, Dec. 17, 2014, available at <https://www.washingtonpost.com/news/volokh-conspiracy/wp/2014/12/17/marquette-suspends-profs-teaching-orders-him-off-campus>.

McAdams' case is being closely watched around the country because faculty are increasingly facing calls for discipline over speech protected by the tenets of free speech and academic freedom. And while FIRE has received complaints of censorship from faculty since our founding in 1999, such cases have increased noticeably in recent years. In just the past few months, there have been a number of instances in which faculty members lost their jobs over controversial social media posts and other public comments.

In August 2017, for example, the University of Tampa terminated visiting professor Ken Storey after he tweeted, from his personal account, that Hurricane Harvey may have been "instant karma" for Texas' support of the Republican Party. Although the university initially defended his right to free speech, it ultimately announced — in an

email sent to the entire university community — that Storey had been “relieved of his duties at UT.” Important Message from the Offices of the President and Provost (Aug. 29, 2017, 11:23 CST) (on file with author). A university spokesman told the Associated Press “that Storey was fired after the school weathered an outpouring of online outrage over the comments.” Associated Press, *University Fires Professor Who Blamed Harvey on GOP Vote*, WASH. POST, Aug. 29, 2017, available at https://www.washingtonpost.com/national/higher-education/university-fires-professor-who-blamed-harvey-on-gop-vote/2017/08/29/26296f7e-8cd4-11e7-9c53-6a169beb0953_story.html.

In June 2017, Trinity College placed Professor John Eric Williams on leave after Williams re-posted a controversial essay, titled “Let Them Fucking Die,” on his Facebook page. The essay — which was not written by Williams — discussed the actions of a “queer black woman” who saved the life of Rep. Steve Scalise, “one of the most anti-LGBTQ politicians in Washington,” after he was shot during a congressional baseball practice. The piece urged that aid should not be offered to people “who practice bigotry” and advocated that when such people are in need of aid, the proper response is to “do nothing.” See Letter from Adam B. Steinbaugh, Senior Program Officer, Found. for Individual Rights in Educ., to Joanne Berger-Sweeney, President, Trinity Coll., July 3, 2017, available at <https://www.thefire.org/fire-letter-to-trinity-college-july-3-2017>.

That same month, meanwhile, Essex Community College suspended (and ultimately fired) communications professor Lisa Durden over comments she made during an appearance on Fox News, in which she argued in support of the right of Black Lives Matter organizers to establish black-only protest spaces. Colleen Flaherty, *Suspended for*

Standing Up to Fox News?, INSIDE HIGHER ED, June 21, 2017, <https://www.insidehighered.com/news/2017/06/21/college-allegedly-suspends-communications-adjunct-comments-about-race-fox-news>. In a June 23 public statement, Essex's president announced that Durden's "employment with [Essex] and potential impact on students required our immediate review into what seemed to have become a very contentious and divisive issue," and that "[i]n consideration of the College's mission, and the impact that this matter has had on the College's fulfillment of its mission, we cannot maintain an employment relationship with the adjunct." Statement from Essex Community College President Anthony Munroe, June 23, 2017, *available at* <http://www.essex.edu/pr/2017/06/23/statement-from-essex-county-college-president-anthony-e-munroe-3>.

In March 2017, Evergreen State College professor Bret Weinstein sent an email to students and faculty objecting to a planned "Day of Absence" at the college that "invited" white students, staff, and faculty to voluntarily leave campus for a day. Bret Weinstein, *The Campus Mob Came for Me — and You, Professor, Could Be Next*, WALL ST. J., May 30, 2017, *available at* <https://www.wsj.com/articles/the-campus-mob-came-for-me-and-you-professor-could-be-next-1496187482>. The responses to his email were so vitriolic that the chief of police told Weinstein he was not safe on campus. Drew Mikkelson, *Professor Told He's Not Safe on Campus After College Protests*, KING 5 NEWS, May 27, 2017, *available at* <http://www.king5.com/news/local/olympia/professor-told-hes-not-safe-on-campus-after-college-protests/443098670>. Weinstein and his wife, also an Evergreen State professor, resigned in September. Abby Spegman, *Evergreen Professor at Center of Protests Resigns; College Will Pay \$500,000*, SEATTLE TIMES, Sept. 16,

2017, *available at* <https://www.seattletimes.com/seattle-news/evergreen-professor-at-center-of-protests-resigns-college-will-pay-500000>.

The assault on professors' rights has also reached the classroom, where faculty are increasingly unable to tackle sensitive or difficult issues without facing calls for discipline.

In May 2017, for example, Howard University law professor Reginald Robinson was deemed responsible for sexual harassment after two students complained about a test question involving a Brazilian wax and an upset client. After a 504-day investigation, administrators determined that Robinson would be required to undergo mandatory sensitivity training, prior administrative review of future test questions, and classroom observation. Robinson also received a stern warning that any further "violations" of the university's Title IX policies may result in his termination. *See* Press Release, Found. for Individual Rights in Educ., Ouch! Brazilian Wax Test Question Nets Howard University Professor a 504-day Title IX Investigation, Sanctions, July 6, 2017, *available at* <https://www.thefire.org/a-sticky-situation-at-howard-university-brazilian-wax-test-question-nets-professor-a-504-day-title-ix-investigation-sanctions>.

In November 2015, University of Kansas communications professor Andrea Quenette held an in-class discussion of a forum held the previous day about racial and cultural issues affecting the campus. Afterwards, eight graduate students — some of whom were not even in Quenette's class — filed complaints against Quenette arguing that Quenette's comments during the discussion were "unacceptably offensive" and violated KU's Racial & Ethnic Harassment Policy. Quenette was subsequently placed on paid leave, pending the outcome of a university investigation. Letter from Peter Bonilla,

Dir., Individual Rights Def. Program, Found. for Individual Rights in Educ., to Bernadette Gray-Little, Chancellor, Univ. of Kan., Feb. 3, 2016, *available at* <https://www.thefire.org/fire-letter-to-university-of-kansas>.

In the fall of 2014, Rowan College at Gloucester County terminated sociology professor Dawn Tawwater after students complained about her use of “indecent language” in the classroom. She was terminated after refusing to sign a “last chance agreement” that would have required her to publicly apologize to her classes and to refrain from using “indecent language” in the future. Letter from Peter Bonilla, Dir., Individual Rights Def. Program, Found. for Individual Rights in Educ., to Frederick Keating, President, Rowan Coll. at Gloucester County, Oct. 29, 2014, *available at* <https://www.thefire.org/fire-letter-to-rowan-college-at-gloucester-county-october-29-2014>.

In 2012, Appalachian State University sociology professor Jammie Price was put on administrative leave after students complained about her speech in the classroom. Among other things, several student-athletes complained after Price criticized student athletes and referenced recent allegations of sexual assault at App State involving student athletes. Letter from Peter Bonilla, Assoc. Dir., Individual Rights Def. Program, Found. for Individual Rights in Educ., to Michael A. Steinback, Chair, Bd. of Trustees, Appalachian State Univ., Mar. 19, 2013, *available at* <https://www.thefire.org/fire-letter-to-appalachian-state-university-board-of-trustees-chair-michael-a-steinback-march-19-2013>.

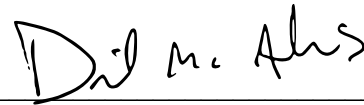
If allowed to stand, the lower court’s ruling will erode the already tenuous expressive rights of faculty at America’s colleges and universities. By granting

administrators judicial cover to discipline dissenting, outspoken, or simply controversial faculty for speaking their minds, letting the lower court's ruling stand would impoverish higher education.

CONCLUSION

The outcome of this case will have a significant impact on the rights of faculty nationwide. We urge this Court to grant the petition for bypass in order to consider the critical issues presented by this case.

Respectfully submitted by:



Daniel M. Adams, SBN 107564
ADAMS LAW GROUP LLC
1200 East Capitol Drive, Suite 360
Milwaukee, Wisconsin 53211
T: 414.921.1945
F: 414.921.1946
Dan@DefenseWisconsin.com
www.DefenseWisconsin.com

Alexandria Morey, SBN 1089462
FOUNDATION FOR INDIVIDUAL
RIGHTS IN EDUCATION (FIRE)
777 North Capitol Street NE, Suite 802
Washington, D.C. 20002
T: 215.717.3473
F: 215.717.3440
Alex@TheFire.org
www.TheFire.org

Attorneys for Foundation for Individual Rights in Education (FIRE)