CIVIL RIGHTS INSIDER

Federal Bar Association Civil Rights Law Section's Newsletter

Fall 2016

From the Desk of the Chairperson

Welcome to the Federal Bar Association's Civil Rights Law Section. I am both honored and privileged to serve as its chairperson for the 2015-16 year. I am very lucky to have the support of so many talented attorneys. In this time of our history, when civil rights are a daily topic of conversation both in the streets and at the water cooler, it is more important than ever to get involved.

In the upcoming year we plan on growing this section and enhancing its programming. We have a quarterly newsletter in which your announcements and articles are welcome. Last year, we had five different articles in the Constitutional edition of The Federal Lawyer (July 2016). We have committees for those on the defense (Defense of Government Entities) and for those interested in how civil rights impacts discrimination (Discrimination in housing, employment, public accommodations), an amicus briefing committee, a CLE committee and liaisons to LGBT, YLD, Labor & Employment and more.

Please mark your calendar for our next section wide conference call on November 16, 2016 at 12 noon EST, and please contact us and tell us how you would like to be more involved. We couldn't be more excited about the upcoming year and hope to hear from you. ■

Wylie Stecklow
FBA Civil Rights Law Section
Chairperson

Members of the Civil Rights Community of Attorneys: For our winter edition of the Civil Rights Insider, we are inviting articles from attorneys in states where changes in voting rights, whether limiting or expanding those rights and/or whether stayed or allowed to go into effect, coincided with the November 8th election. We are looking for 300-750 words regarding observable impact on turnout.

If you are able to be our "Reporters in the Field", please contact Marilyn.Tobocman@ohioattorneygeneral.gov and/or sdane@relmanlaw.com

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In this Issue:

Reasonable Accommodation Review of Service Animals under the Americans With Disabilities Act and Fair Housing Act: The "Fact-Specific Inquiry"

by Kathleen F. Ryan, Associate, Manley Burke LPA

On August 14, 2015, the Court of Appeals for the Sixth Circuit reversed the Southern District of Ohio's grant of summary judgment to the City of Blue Ash, Ohio in the case of *Ingrid Anderson, et al v. City of Blue Ash* on Plaintiffs' reasonable accommodation claims for miniature horse as a service animal under both the Americans with Disabilities Act (ADA) and the Fair Housing Act (FHAA).[1] The Sixth Circuit also reversed the lower court's decision that the Plaintiffs' claims were barred based on issue and claim preclusion. Plaintiffs in *Anderson* seek to return a miniature horse named "Ellie" to a now sixteen year-old disabled girl, C.A., who resides in a single-family residence in Blue Ash, Ohio, and who has numerous severe disabilities.

Complicating the case and giving rise to the many issues resolved by the Sixth Circuit is the long and convoluted history between the parties that finally lead to the filing of the lawsuit in February, 2014. In 2010, C.A.'s doctor recommended the use of horses as a form of therapy for C.A. Noting C.A.'s tendency toward exhaustion when driven across town for horse therapy, her doctor supported, "the housing of a miniature horse for in-home therapy support for [C.A.]."[2] Allowing the miniature horse to be at her home, "at her disposal," would allow C.A. to enjoy her backyard more independently and alleviate the mental and physical effects of her disabilities.

In 2012, C.A.'s mother Ingrid Anderson faced opposition for harboring one, and then two miniature horses at her residence within the City.[3] At the time, the City's Board of Zoning Appeals and Council refused to recognize the horses under the ADA, but allowed her to continue to keep one horse on the property. Anderson did not appeal the Council's determination. In late 2012, Anderson then moved to her current residence, and C.A. received her current miniature horse, Ellie. In 2013, the City ordered Ellie to be removed from C.A.'s property after the City passed an ordinance prohibiting "farm animals" on residential property. The City cited C.A.'s mother for harboring a "farm animal" at her home within the City. The Hamilton County Municipal Court found Ms. Anderson guilty, but waived her fine. She did not appeal that conviction.

Both the ADA and FHAA protect disabled individuals' rights to utilize service animals under certain circumstances. Title II of the ADA requires that public entities must make reasonable modifications or changes to their policies, practices, or procedures for disabled persons. [4] The FHAA, "creates an affirmative duty on [a] municipalit[y]…to afford its disabled citizens reasonable accommodations…"[5] Central to the "reasonable accommodation" process under both the ADA and FHAA – whereby the needs of the disabled person are balanced against the potential adverse impacts an animal may impose on others - is the "fact-specific inquiry."

In instances where a plaintiff seeks relief under both the ADA and FHAA with regard to a service animal, the scope of the inquiry and relevant facts can vary widely between those two causes of action. This is because the regulations recognizing a service animal under the ADA and FHAA vary, with some outright contradictions. Under the ADA, the legal term for such an animal is a "service animal", while the FHAA does not designate a specific term.[6] The ADA requires that an animal be, "individually trained to do work or perform tasks for the benefit of the individual with a disability."[7] There is no training requirement for animals under the FHAA.[8] The ADA requires no special certifications or documentation of the service animal's status or the disabled person's need for the animal[9], but the FHAA allows public entities and housing providers to require supporting documentation to show that an animal is required to, "alleviate the effects of a disability."[10]

The ADA recognized only dogs as service animals under the ADA until March, 2011, when the ADA regulations were amended to add a "miniature horse" as an acceptable species under the ADA.[11] There are no species restrictions on animals recognized as assistance animals under the FHAA. Courts have recognized a variety of species of animals as assistance animals under the FHAA that may seem quite unusual or unexpected.[12]

The crux of the Sixth Circuit's reversal on the issues of claim and issue preclusion and reasonable accommodation under both the ADA and FHAA in *Anderson* was the ability of Plaintiffs to receive thorough "reasonable accommodation" reviews that preserved the integrity of the "fact specific inquiry" central to such reviews under both the ADA and FHAA. Observing that prior review under the ADA concerned an, "appeal to the Council [that] dealt with two different miniature horses at a different location," the Court refused to recognize such review as either a legitimate reasonable accommodation review as to the current horse, or a basis for issue or claim preclusion.[13] As to the prior municipal court case concerning the same horse and same location, the Court stated:

Anderson's ADA and FHAA claims require fact-intensive inquiries that are greatly affected by the differences in the municipal criminal court's fact-finding procedures, particularly the lack of civil discovery. Thus Anderson's ability to pursue her claims [in municipal court as a criminal defendant] was "qualitatively different" than it is here.[14]

The Court likewise found that the City was not entitled to summary judgment as to Plaintiffs' FHAA claim, stating, "[f] actual disputes pervade the question of the accommodation's reasonableness and the 'highly fact-specific' balancing of the City's interests against the plaintiffs' that it requires, precluding summary judgment for the City."[15]

The parties in the *Anderson* case settled in August, 2016. The pertinent terms of the settlement agreement are that the City agrees to recognize "Ellie" as a reasonable accommodation for C.A. under the Fair Housing Act, that Ms. Anderson agrees to hire an animal waste pickup service to pick up animal waste three days per week, and she must pick up animal waste another two days per week, and the City has the right to inspect the backyard at any time between 9 a.m. and 9 p.m. without probable cause.

The evolving circumstances and complexity of the issues in this case are a reminder that when it comes to the review of service or assistance animals, reasonable accommodation reviews must be done with great thoroughness and care. Reviewing entities should be mindful of each request and the specific federal law under which the review is requested. A request regarding a service animal made under the FHAA is insufficient to cover one made regarding the same animal under ADA, and vice-versa. Additionally, where pertinent facts change, a new reasonable accommodation review is likely warranted. ■

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Endnotes

[1]*Anderson v. City of Blue Ash*, 798 F.3d 338 (6th Cir. 2015).

[2]*Anderson*, 798 F.3d at 347.

[3]*Anderson*, 798 F.3d at 348.

[4]42 U.S.C. § 121802(b)(2)(A)(ii).

[5]*Howard v. City of Beavercreek*, 276 F.3d 802, 806 (6th Cir. 2002); 42 U.S.C. § 3604(f).

[6]An assistance animal under the FHA may referred to by a number of terms, such as: "service animal," "assistance animal," "support animal," "emotional support animal," or "therapy animal."

[7]28 C.F.R. § 35.136(i)(1).

[8]See. e.g., *Fair Hous. Of the Dakotas, Inc. v. Goldmark Prop. Mgmt., Inc.*, 778 F. Supp. 2d 1028, 1036 (D.N.D. 2011).

[9]"A public entity shall not require documentation, such as proof that the animal has been certified, trained, or licensed as a service animal." 28 C.F.R. 35.136(f).

[10]*Bhogaita v. Altamonte Heights Condo Ass'n*, 765 F.3d 1277, 1288-89 (11th Cir. 2014).

[11]Miniature horse "assessment factors" are found in 28 CFR § 35.136(i)(2).

[12]*See, e.g., Velzen v. Grand Valley State Univ.*, 902 F. Supp. 2d 1038 (W.D. Mich. 2012) (FHAA case regarding a guinea pig); *Peklun v. Tierra Del Mar Condominium Association*, Case No. 15-80801-CIV (S.D. Fla. August 3, 2015) (Re: sheep - Plaintiff, "may proceed with her claims that the County's established variance process discriminates against her and that the County must provide her reasonable accommodations from the usual procedure.").

[13]*Anderson*, 798 F.3d at 351.

[14]*Anderson*, 798 F.3d at 353.

[15]*Anderson*, 798 F.3d at 363.

Supreme Court Previews

Provided by Lucia Blacksher Ranier, Professor of the Practice and Director, Civil Litigation Clinic, Tulane Law School

Pena-Rodriguez v. People, 350 P.3d 287 (Colo. 2015), cert. granted, 136 S.Ct. 1513 (2016)

The U.S. Supreme Court will hear oral argument in this case on October 11, 2016. The question presented is whether the "no impeachment" rule protecting jury deliberations, codified in the Colorado and Federal Rules of Evidence as Rule 606(b), bars evidence of racial bias to prove a violation of the Sixth Amendment right to an impartial jury.

Miguel Angel Pena–Rodriguez was convicted of sexual assault on two under-aged girls. After the verdict was rendered, the trial court allowed defense counsel to obtain affidavits from two jurors, who testified that another juror, an ex-law enforcement officer, had made racially biased remarks during jury deliberations, such as he believed the defendant was guilty "because he's Mexican and Mexican men take whatever they want," and that an alibi witness was not credible because he was "an illegal."

The Colorado Supreme Court, with three justices dissenting, affirmed the conviction. It held that Rule 606(b), which prohibits inquiry into the validity of a jury verdict, barred the evidence of racial or ethnic bias, concluding that it did not fall within the rule's exception for "extraneous prejudicial information," and that application of Rule 606(b) in this case did not violate the defendant's Sixth Amendment right to an impartial jury. The dissenters agreed that Rule 606(b) barred the post-verdict affidavits, but thought application of the rule here violated the Sixth Amendment, saying "[r]acial bias is detestable in any context, but in our criminal justice system it is especially pernicious."

The U.S. Supreme Court has upheld the constitutionality of Rule 606(b) in the contexts of other kinds of juror bias or prejudice. But it has never squarely addressed the question presented here, whether the no-impeachment rule violates the Sixth Amendment when it bars evidence of racial bias or prejudice. This question comes before the Supreme Court at a time when immigration and "black lives matter" issues are dominating the national debate. ■

Manuel v. City of Joliet, 590 Fed.Appx. 641 (7th Cir. 2015), cert. granted, 136 S.Ct. 890 (2016)

The Fourth Amendment provides: "The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no Warrants shall issue, but upon probable cause,

supported by Oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized." In the Seventh Circuit, a claim under 42 U.S.C. § 1983 for an arrest and detention in violation of a person's Fourth Amendment rights is limited to the time before arraignment, when the state's legal processes take over. Thereafter, a claim of malicious prosecution must be based on a violation of the Due Process Clause of the Fourteenth Amendment, not the Fourth Amendment, and no due process claim can be brought in federal court if a malicious prosecution cause of action is available in state court. At least nine other Circuits, however, authorize plaintiffs in federal court to rely on their Fourth Amendment rights even after state court criminal proceedings have begun.

Elijah Manuel, an African American, was arrested on a charge of possessing the drug Ecstacy, even though the arresting officers ran a test and knew they actually were vitamin pills. Based on the falsified affidavit of the officers, Manuel was arraigned in county court and remanded to jail, where he remained for over a month, because the state's attorney withheld from defense counsel further negative test results. He was released the day after the assistant district attorney finally moved to dismiss the charges. Manuel filed a pro se complaint in federal court beyond the statute of limitations for his Fourth Amendment challenge to the unlawful arrest, but within the time for bringing a malicious prosecution claim, which did not begin to run until criminal court proceedings were concluded in his favor. The Supreme Court has granted certiorari to determine whether a federal court plaintiff can pursue his Fourth Amendment rights against pretrial detention beyond the point where the state legal process begins.

The Supreme Court amicus briefs advance the competing views of public policy surrounding the Black Lives Matter and Support Our Police movements dominating the today's news. Advocates of victims of police abuse argue that allowing malicious prosecution claims under the Fourth Amendment "would help disincentivize the use of law enforcement tactics that contribute to wrongful convictions." Brief of the Innocence Project at 28. While advocates for the police warn that such an expansion of Fourth Amendment claims "will discourage officers, and the departments who train them, from applying the full extent of their authority to protect law-abiding citizens." Brief of DRI – The Voice of the Defense Bar at 3. This is another case where the death of Justice Scalia is likely to make a significant difference in the Supreme Court's development of constitutional law surrounding controversial topics on the national agenda. ■

Bethune-Hill v. Virginia State Bd. of Elections, 141 F.Supp.3d 505 (E.D. Va. 2015) (three-judge court), probable juris. noted, 136 S.Ct. 2406 (2016)

Bethune-Hill was the first case to apply to state legislative districts the racial gerrymandering standards set out in *Alabama Legislative Black Caucus v. Alabama*, 135 S.Ct. 1257 (2015), the latest Supreme Court decision elaborating the unique Fourteenth Amendment principles first announced in <EM>*Shaw v. Reno,* 509 U.S. 630 (1993), which make over-reliance on race in redistricting unconstitutional.

Bethune-Hill concerns the Virginia Assembly's application of an across-the-board 55 percent black voting-age population (BVAP) floor for every majority-black district, unlike the district-specific total population percentages Alabama attempted to maintain. 141 F.Supp.3d at 519. Id. at 572 (Keenan, J., dissenting). But Judge Payne's majority opinion interpreted *ALBC v. Alabama* to have rejected any "per se predominance rule." 141 F.Supp.3d at 524. Instead, the *Bethune-Hill* majority said, while "evidence of such thresholds is still significant when examining those districts that exhibit deviations from traditional, neutral districting principles, . . *Alabama*, like its predecessors in the *Shaw* ... line, holds that racial thresholds constitute evidence, not dispositive proof, of racial predominance." Id. at 532. However, Judge Keenan, the dissenting judge in *Bethune-Hill,* read *ALBC v. Alabama* to render every targeted district an unconstitutional racial gerrymander when the racial floor is "a fixed, non-negotiable quota."

Bethune-Hill emphasizes the importance of traditional, race-neutral districting principles, which "are informed by, but not defined by, state law." It notes the Supreme Court's emphasis on transgressions of the Legislature's own redistricting guidelines. But Judge Payne distinguishes between "transgression" and "subordination:" "That is because 'subordination' is not the same as a 'violation' or 'transgression.' Subordination requires a balancing of degree to determine whether non-racial criteria or racial criteria predominated." ■

Rodriguez v. Robbins, 804 F.3d 1060 (9th Cir. 2015), cert. granted sub nom. Jennings v. Rodriguez, 136 S.Ct. 2489 (June 20, 2016)

This case addresses the murky boundaries between immigration law and the Constitution. Asked to clarify when bond hearings must be provided for persons detained during immigration proceedings, the Supreme Court granted the Government's cert. petition in the closing days of its last term. The Court's decision will impact the over 400,000 persons being detained each year by the Immigration and Customs Enforcement agency (ICE).

Article I, section 8, of the Constitution gives Congress the power "To establish an uniform Rule of Naturalization." The Fifth Amendment protects "any person" from being "deprived of life, liberty, or property, without due process of law...." Relying on precedent established during the McCarthy era crackdown on communists, ICE contends that "the power to expel or exclude aliens [is] a fundamental sovereign attribute exercised by the Government's political departments largely immune from judicial control." *Shaughnessy v. United States ex rel. Mezei*, 345 U.S. 206, 210 (1953). But in more recent decisions, to avoid constitutional concerns, the Court has interpreted the immigration statutes to limit civil detention of both entering aliens and legal immigrants to a "reasonably necessary" period of time. *Zadvydas v. Davis*, 533 U.S. 678, 689 (2001).

In this class action on behalf of several subclasses of persons detained by ICE, the Ninth Circuit, citing the principles of constitutional avoidance, held that six months was the maximum time persons in ICE custody could be detained without a bond hearing, placed the burden on the Government to prove they were flight risks, and said immigration judges did not have to consider the likelihood of further detention or removal. The Government says this "oversteps the proper judicial role" in immigration proceedings and violates the political branches' "plenary control over which aliens may physically enter the United States and under what circumstances." Its petition warns that the Ninth Circuit's rule "creates an incentive for people to make a potentially life-threatening trip to this country, to abuse our legal process to obtain entry into the United States, and then to disappear rather than appear at any removal proceedings." ■

Trinity Lutheran Church of Columbia, Inc. v. Pauley, 788 F.3d 779 (8th Cir. 2015), cert. granted, 136 S.Ct. 891 (Jan. 15, 2016)

Nearly seventy years ago the Supreme Court held that the Establishment Clause of the First Amendment prohibits public funding "to support any religious activities or institutions, whatever they may be called, or whatever form they may adopt to teach or practice religion."

Everson v. Board of Ed. of Ewing, 330 U.S. 1, 16 (1947). But, as the Eighth Circuit noted in this case, Establishment Clause jurisprudence "has evolved rather dramatically" in the last forty years. The Court has upheld claims based on the Free Exercise Clause and the Equal Protection Clause to approve some public services to schools affiliated with churches, like sending in special education teachers, *Agostini v. Felton*, 521 U.S. 203 (1997), and allowing parents fleeing from failing public schools to take their public vouchers to religious schools. *Zelman v. Simmons-Harris*, 536 U.S. 639 (2002).

In *Trinity Lutheran* the Court is being asked to open the wall between church and state even wider by not just *allowing* states financially to support some services for religious schools but *requiring* them to do so in some circumstances. Missouri's constitution has provisions "not only more explicit but more restrictive than the Establishment Clause of the United States Constitution." Citing those state constitutional prohibitions, the Missouri Department of Natural Resources refused to allow Trinity Lutheran's church school to participate in a program that subsidized the purchase of recycled tires to resurface playgrounds. Both courts below dismissed Trinity's claims based on free exercise and equal protection, holding that the anti-establishment provision in the Missouri constitution does not violate the Federal Constitution.

In the Supreme Court, Trinity Lutheran argues that "the Missouri state constitution's antiestablishment concerns cannot trump the United States Constitution's guarantees of free exercise of religion and equal protection to all citizens." It even argues that Missouri's anti-establishment provision, enacted in 1875, was one of the "Blaine Amendments" passed in the late nineteenth century by states hostile to the Catholic Church. Missouri says it is free to have a public policy not to subsidize religion of any kind, and that it does not violate either the Free Exercise or Equal Protection Clauses of the U.S. Constitution. ■

United States v. Bravo Fernandez, 790 F.3d 41 (1st Cir. 2015), cert. granted, 136 S.Ct. 1491, (Mar. 28, 2016)

This case asks the Court further to clarify the constitutional law of double jeopardy. The Fifth Amendment prohibits "any person" from being "subject for the same offence to be put in jeopardy of life or limb...." Decades ago the Supreme Court established a collateral estoppel prong to protection against double jeopardy, holding that a no-guilty jury verdict bars retrial both on the same charge and on any other charge based on an issue necessarily decided by the acquittal. *Ashe v. Swenson,* 397 U.S. 436 (1970). More recently, the Court held that when a jury acquits on one count but hangs on another, the acquittal precludes retrial on the hung count if, by acquitting, the jury necessarily decided facts in defendant's favor that were essential to the hung count, even if the jury's failure to reach a verdict on one count is inconsistent with its acquittal on another count. *Yeager v. United States,* 557 U.S. 110 (2009).

The question before the Court in this case is whether the *Yeager* principle applies not only to a hung count but to a conviction vacated on appeal because of an improper jury instruction, even though the issue on which the jury convicted was inconsistent with the counts on which they acquitted the defendants. The defendants here were a Puerto Rican business man and the elected official he allegedly bribed with a trip to Las Vegas. The jury convicted the defendants on the bribery count but acquitted them on conspiracy and racketeering counts that were predicated on the bribery issue. The bribery conviction was vacated on appeal and remanded for a new trial, because the district court had erroneously instructed the jury they could find the defendants guilty of offering and receiving a gratuity as well as a quid pro quo bribe. On remand the district court denied defendants' double jeopardy motion for acquittal on the bribery count, because, considering the convictions and acquittals together, it could not say for certain that the jury necessarily decided the underlying bribery issue in defendants' favor when they acquitted on the conspiracy and racketeering counts. The First Circuit affirmed, and the Supreme Court granted certiorari.

The defendants, supported by amicus briefs, including one by fourteen criminal law professors, argue that, like hung counts, vacated convictions are legal nullities, and double jeopardy bars the district court from even inquiring whether the issues necessarily decided in the conviction count were inconsistent with the issues in the acquittal counts. They criticize today's federal prosecutors for overcharging alleged offenders and argue allowing a new trial here would encourage an unjust trend toward multiple charges for the same offense. The United States defends the holding below, and it denies "that prosecutors strategically overcharge and adopt indefensible interpretations of statutes in hopes of obtaining an inconsistent

verdict so as to defeat the application of collateral estoppel in any ensuing retrial."

The amicus briefs on behalf of both parties predictably warn of floodgates problems they fear will arrive however the Court rules. Religious freedom advocates predict an affirmance will threaten existing public funding of religious social services, for example, at soup kitchens and battered women's shelters. Civil libertarians, on the other hand, warn that a decision for Trinity Lutheran will require public funding of religions that discriminate on the basis of race, gender, and sexual orientation.

There are pleading issues, state law questions, and a dispute over whether Trinity Lutheran has brought a facial or as-applied challenge to the Missouri Constitution, which may provide the Court a way to avoid these weighty constitutional issues, concerning which certiorari was granted before Justice Scalia died.

The respondent immigrant advocates defend the Ninth Circuit's categorical, six-month definition of what is reasonable in Congress' statutory scheme, and they ask the Court to hold that immigrant detainees have "the same hearing protections that this Court has required in other civil detention contexts." Respondents say the Government's warnings about "the risk of terrorism is hyperbolic" and unsupported by actual experience since the challenged injunction was entered in 2012.

We can expect the merits briefs to attract support from amici curiae representing all sides of the current national debate over immigration reform. This case likely will be decided by a full, nine-member Court, and its outcome likely will be determined by this November's Presidential election.

The traditional districting principles the majority balanced against the drafters' 55 percent racial target to determine whether race predominated included: respect for political subdivisions such as counties or cities, compactness, geographic boundaries, precinct boundaries, or communities of interest, avoiding contests between incumbents, partisan political interests (although political objectives cannot use race as a proxy for political characteristics), and preservation of the core of prior districts. Analyzing each district separately, Judge Payne concluded that race predominated over traditional districting principles in only one of the twelve majority-black districts challenged by plaintiffs, and that Virginia's justification of racial predominance in that one district survived strict scrutiny. Judge Keenan, dissenting, would have found all twelve districts to be unconstitutional gerrymanders.

This case will present another opportunity for the Supreme Court to clarify the line that separates the intentional creation of compact majority-black districts, which the Voting Rights Act often requires, from unconstitutional subordination of traditional districting principles to race, which violates the *Shaw v. Reno* jurisprudence. ■

Lucia Blacksher Ranier is a Professor of the Practice and trial attorney with experience enforcing housing equity, civil rights and disability rights. She joined the Tulane Civil Litigation Clinic in 2009 and was named director in 2016. Blacksher Ranier spent five years as a trial attorney with the U.S. Justice Department's Civil Rights Division, representing the United States in lawsuits involving disability discrimination violating the Americans with Disabilities Act. She also spent five years as the Greater New Orleans Fair Housing Action Center's general counsel, handling litigation to secure equal housing opportunity. In the Civil Litigation Clinic, she supervises student-attorneys in a range of client representation, including federal cases involving the civil rights of people incarcerated in state or local correctional facilities, employment discrimination, housing discrimination, police misconduct, First Amendment violations, and other constitutional claims.

Upcoming Civil Rights Law Section Events

Don't forget to add to your calendar!

Conference Call: Nov. 16 at 12:00 p.m. EST

We hope you will join us for the Civil Rights Law Section call open to all members on Nov. 16. Note the dial-in information below.

Dial-in: 866-690-2070 **Code:** 435-058-9673

Save The Date: New Orleans, Louisiana—Here we come.

Laissez Les Bon Temps Roulez! Join the Civil Rights Law Section, in partnership with the New Orleans Chapter, in New Orleans for the French Quarter Fest and the first, hopefully soon-to-be annual, Civil Rights CLE. Mark your calendars for Friday, April 7, 2017 in New Orleans. This very same weekend is the very popular French Quarter Fest (fqfi.org). If you would like more information on this CLE, let us know at FBAcivilrightslaw@gmail.com.

Federal Bar Association
Civil Rights Law Section

FRENCH QUARTER FEST 2016

Federal Bar Association
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