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VIA EMAIL ONLY

Stafford County School Board
31 Stafford Avenue
Stafford, VA 22554

**CONFIDENTIAL ATTORNEY-CLIENT PRIVILEGED OPINION
NOT FOR PUBLIC DISCLOSURE**

Dear Chairwoman Healy and members of the School Board:

I am writing to provide an analysis of the legal issues, legal and practical considerations, and potential effects to the school division related to upcoming School Board action on the two nondiscrimination policies that are before the Board for consideration. I will also address the list of questions posed by various School Board members relating to the two policies at issue.

Identification of Policies Under Consideration by School Board:

A. Policy 4107: Nondiscrimination Equal Employment Opportunity Anti-Retaliation.

This policy, which prohibits discrimination in employment, expands the existing Policy 4107 in two primary areas. First, it expands the list of classes protected from discrimination to include marital status, genetic information, sexual orientation and gender identity. Second, it provides that the Superintendent/designee shall be responsible for developing a plan to implement the intent of the new policy, which shall be shared with the board for input and review.

B. Policy 2420: Nondiscrimination Equal Educational Opportunity

This policy, which prohibits discrimination against students, is a new policy before the School Board. It mirrors the discrimination protections in the proposed Policy 4107, but applies to educational programs, admission to such programs and activities by students.

Current Legally Protected Classes:

The current protected classes under federal law are: race, color, national origin, religion, sex, pregnancy, childbirth and related medical conditions, disability, age and genetic information. "Protected classes" receive special legal protection from discrimination. While the

focus of this opinion, as requested, is on gender identity and sexual orientation protections, I note that in addition to those classes, this policy protects against discrimination based upon political affiliation and marital status. Neither Federal nor Virginia law has protections for discrimination based upon marital status, except under the Virginia Human Rights Act which does not apply to Stafford County Schools. In addition, political affiliation is not a protected class under either Federal or Virginia law.

Current Law Affecting Whether Gender Identity or Sexual Orientation are Legally Protected Classes:

The primary laws that have been used to support claims of discrimination based upon gender identity or sexual orientation include Title IX of the Educational Amendments, Title VI of the Civil Rights Act, the Equal Protection Clause of the 14th Amendment of the U.S. Constitution and the First Amendment Freedom of Religion. Some of these claims have been more or less successful in courts across the United States, but none has yet reached conclusion by the U.S. Supreme Court or the 4th Circuit Court of Appeals, which have jurisdiction over Virginia school divisions.

A primary legal issue under Title IX and Title VI is whether the law that prohibits sex discrimination also protects from discrimination based upon gender identity or sexual orientation. Courts across the country disagree on this issue. Several courts, including some federal appellate courts, have held that Title IX and Title VI bar discrimination on the basis of gender identity and sexual orientation. They argue that this kind of discrimination should be considered part of sex discrimination, and is therefore barred by Title IX and Title VI. Other courts have held that the Title IX and Title VI prohibition of discrimination on the basis of sex does not include gender identity protections.

In May 2016, under the Obama administration, the U.S. Department of Education Office for Civil Rights and the Department of Justice jointly released guidelines on school district responsibilities for transgender students. This guidance held that discrimination on the basis of gender identity *did qualify* as discrimination on the basis of sex, and was therefore illegal under Title IX. When President Trump took office, he rescinded Obama's executive order and withdrew the DOJ guidelines. As of February 2018, the U.S. Department of Education confirmed it is no longer investigating civil rights complaints from transgender students barred from school bathrooms that match their gender identities. The DOJ does not have jurisdiction to investigate, because current law does not include gender identity discrimination as a suspect class that is protected by law.

The United States Supreme Court has not yet ruled on whether the various laws cited above, including constitutional amendments, Title IX and Title VI, prohibit discrimination on the basis of gender identity or sexual orientation. On April 22, 2019, the U.S. Supreme Court granted a petition for a writ of certiorari to review a decision of the U.S. Court of Appeals from the 6th Circuit in *Equal Employment Opportunity Commission v. R.G. and G.R. Harris Funeral Homes*, 884 F. 3d 560 (6th Cir. 2018). The question in that case is whether Title VII of the Civil Rights Act of 1964 (which uses the same language as Title VI of the Civil Rights Act that applies to public schools, and which is considered guidance in interpreting Title IX) prohibits

discrimination against transgender people based on their status as transgender or based on sex stereotyping. The Supreme Court has not yet scheduled oral argument on that case, and any decision could be a year or more away.

In our own 4th Circuit Court of Appeals, in the case of *G.G. v. Gloucester County School Board*, the plaintiff asserted that the school board's bathroom policy was unconstitutional under the 14th Amendment and that it violated Title IX (which prohibits sex discrimination in schools). The school system's policy, adopted in 2015, required students to use the bathroom facilities consistent with their biological gender. Gavin Grimm was a 15-year old transgender male, and was not permitted to use male restroom facilities. The case was first heard by the U.S. District Court of the Eastern District of Virginia, which denied Grimm's claims for injunctive relief and dismissed the Title IX claim. After the decision was appealed, the U.S. Court of Appeals for the 4th Circuit overturned the lower court's decision to dismiss the case, finding that Title IX protected against gender identity discrimination and required the school district to provide access to facilities corresponding to the student's gender identity.

Gloucester County School Board appealed that decision to the U.S. Supreme Court. The 4th Circuit's ruling was stayed pending the Court's decision on the petition to appeal. The U.S. Supreme Court granted the Board's request to review the 4th Circuit decision, but before it could hear the case, the Trump administration rescinded the Department of Education's guidance. The Supreme Court then remanded the case back to the lower court to be re-heard in light of the fact that the DOJ guidance, upon which the lower court had relied in part for its decision, had been rescinded. By this time Gavin Grimm had graduated from high school, so he filed an Amended Complaint with the District Court for damages and a declaration that the School Board had violated his rights under Title IX and the Equal Protection Clause. On May 22, 2018, the Eastern District of Virginia denied the School Board's motion to dismiss. The School Board then moved to "stay" the case until the U.S. Supreme Court heard the *R.G. and G.R. Harris Funeral Homes* case from the 6th Circuit, since an appeal had been granted. On June 21, 2019, the U.S. District Court denied that motion to stay, finding, among other things, that case would not be addressing the equal protection clause claims (but only Title VII). On July 23, 2019, the U.S. District Court held a hearing on Motions for Summary Judgment, after which the court issued its ruling on August 9, 2019 in favor of Mr. Grimm. In its Order, the court declared that the Gloucester School Board's policy violated Grimm's rights under the 14th Amendment to the U.S. Constitution and Title IX of the Education Amendments of 1972, and further declared that the Board's refusal to update Grimm's official school transcript to conform to his "male" designation on his birth certificate (which he had changed) also violated those rights. The time limit has not yet run, but it is expected that the Gloucester School Board will appeal this decision to the U.S. Court of Appeals for the 4th Circuit.

It is important to note that this opinion in *G.G. v. Gloucester County School Board* does not constitute binding legal precedent, but the decision would be instructive to other lower courts in Virginia on the issue. Of course, this decision does not relate to the current matter before the School Board as to whether to add gender identity or sexual orientation to its nondiscrimination policies. Instead, it provides some guidance that should give school divisions pause before they institute policies that specifically mandate that students use bathroom and locker room facilities based on their biological gender.

Can the School Board Legally Add Gender Identity and Sexual Orientation?

Yes. There is no law that prevents a Virginia School Board from choosing to include additional classes in its nondiscrimination policies, and many School Boards have done so or are planning to do so. While some claim that voluntarily adding those protections to policies when not legally required violates Virginia's Dillon Rule (which provides that School Boards can only exercise those powers that are expressly granted by the Commonwealth), a March 4, 2015 Opinion of the Attorney General found that the Dillon Rule does not prevent school boards from amending their antidiscrimination policies to prohibit discrimination on the basis of sexual orientation and gender identity. The reasoning was that "the power to protect students and employees from discrimination in the public school system is a power fairly implied from the express grant of authority to school boards under Article VIII, Section 7 of the Constitution of Virginia [that vests in the school board the obligation to provide for the supervision of schools] and from the specific authority granted to boards by the General Assembly" in various statutes. I am aware of one case filed in Fairfax Circuit Court making this challenge over a year ago which was dismissed by the court at an early stage.

Should the School Board Add Gender Identity and Sexual Orientation?

This decision is properly one before the School Board and will likely lead to public outcry and potential legal consequences either way, as explained below. As legal counsel to the School Board, I can legally justify and defend whichever position is taken by the Board under current law. I agree that there exist compelling reasons on both sides of this issue. I have been asked to provide a recommendation to the Board taking all of these factors into consideration. My recommendation is based purely on risk-management considerations resulting from an analysis of which position may more likely lead to litigation, and without considering public policy or morality issues, which are within your purview as School Board members. From a risk standpoint, I recommend that these additions to the nondiscrimination policies not be passed at this time because the law is unsettled in this area, there is no legal mandate to do so, and because the School Board could open itself up to additional liability by voluntarily obligating itself to protect classes of persons not currently required to be protected by state or federal law. Adding gender identity and sexual orientation to these policies (and marital status and political affiliation) could create additional legal grounds for the School Board to be sued for failures to follow its own policies. Regardless of the state of the law and whether gender identity and sexual orientation will ultimately be included in the classes protected by the law, schools continue to have the obligation to ensure that all students are able to learn and thrive in a safe environment, including LGBTQ students.

Potential Consequences for Consideration by the School Board if Gender Identity and Sexual Orientation are added to the Employment and Student Discrimination Policies

A. Need for additional policies / regulations

Both of the proposed revisions to the nondiscrimination policies provide in very general terms that the School Board will not unlawfully discriminate against numerous classes of persons. However, the proposed revisions do not provide any specific direction on the significant issue of what this nondiscrimination means in the context of the day-to-day operations of the

school division, such as how gender identity will be handled in bathrooms, locker rooms and on field trips. It would typically be appropriate to pass a Regulation after adoption of the policy changes to address these issues. Both proposed policies, under the heading "Evaluation and Review," read:

The superintendent/designee shall be responsible for developing a plan that implements the intent of the board as set forth in this policy and ensuring that it is reviewed periodically. Such plan shall be shared with the board for input and review.

Because the issues that would be addressed in any regulation under these revised policies are both legally unsettled and the subject of strong opinions county-wide, I would recommend that you clarify in this section that the regulations will be voted on by the School Board by adding to the last sentence the phrase "and approval." This would also give the community the opportunity to be heard on the regulations in a public meeting before any final approval by the Board. The paragraph would then read:

The superintendent/designee shall be responsible for developing a plan that implements the intent of the board as set forth in this policy and ensuring that it is reviewed periodically. Such plan shall be shared with the board for input, review and approval.

Several school divisions have passed policies and/or regulations on the issues of usage of restrooms, locker rooms and other specifics based upon gender identity considerations as part of any nondiscrimination policies, but it is not necessary to do so at the same time.

Should the School Board pass these two policies, however, the specific manner in which the school division handles these issues will be at the forefront. As in any case where there is a dispute over restroom or locker room issues, any affected person would cite these revised nondiscrimination policies to allege he/she/they are being discriminated against by not being permitted to use the facilities of his/her/their gender identities. In order to implement these revised nondiscrimination policies, it will be necessary to follow the language cited above and develop regulations, which will need to address the issues of bathroom, locker room and other access to opportunities (such as field trips) based upon gender identity. Further, if these policies are passed where the Board is affirming that they will not discriminate against employees and students based upon gender identity, it leads to the logical conclusion that students (and personnel) will be permitted to use the facilities of their gender identity, with or without any specific regulations that state that. Regulations will be necessary, however, to address how and under what circumstances the schools will recognize a particular student's gender identity, parent involvement, medical opinion requirements, etc.

B. Need to make changes to additional current policies

There are several additional policies and regulations of Stafford County Public Schools that reference discrimination or protected classes. If these revised nondiscrimination policies are passed, it will be necessary to incorporate the same language (adding marital status, genetic

information, sexual orientation, gender identity) in each of these other policies and regulations. This should be done promptly if the Board approves the new policies.

The following policies would need to be amended to add the additional classes:

- 2401-R Code of Student Conduct
- 2402 Sexual Harassment/Harassment Based on Race, National Origin, Disability and Religion
- 2402-E Harassment Report Form (change title of form)
- 2411 Student Publications
- 2419 Student Clubs and Organizations
- 3308 Charter Schools
- 4107-R Nondiscrimination, Equal Employment Opportunity, Anti-Retaliation
- 4110 Sexual Harassment and Other Unlawful Harassment
- 9104 Distribution of Information/Materials

C. Litigation

Should the School Board implement the revised nondiscrimination policies, particularly without any corresponding regulations that implement specific rules for student gender identity issues, it could lead to litigation against the School Board by persons claiming that the school division's actions relating to a student are discriminatory. If there is any dispute by a parent whose child is not being permitted to use the restrooms, locker rooms or other programs based upon the child's gender identity, in addition to current legal grounds for a potential challenge, the parent would also likely allege a violation by the School Board of its own policies as a basis for litigation.

It is important to note that even if these new policies are not passed, that does not ensure that the School Board will not become involved in litigation over these issues. While the Board would not likely be sued for failing to add gender identity and sexual orientation to the policies (because it is not legally required to do so), it could still see litigation in the form of claims of discrimination by employees or students who feel they have suffered discrimination in their employment or their access to educational programs.

Additional Questions Posed by School Board Members:

Because the issues in this subject area are constantly evolving, many of the questions presented for me to address do not have any settled or clear answers under Federal or Virginia law. While I hope to provide guidance on the legal issues and ramifications of taking certain actions, it is not possible to predict exactly what will or will not happen on the social, political or legal landscape as a result of the School Board passing or not passing these policies. While it is true that the Board could legally vote either way on these policies (given the lack of legal precedent on these issues), what is likely or even possible to occur as a result of any decision is uncertain.

I have answered many of the questions presented by various Board members in the sections above, but below provide answers to the remaining questions.

1. Right to privacy / successful lawsuits. There is no specific amendment to the Constitution that creates a general right to privacy. Several of the amendments, however, provide protections for privacies, such as the privacy of beliefs (First Amendment), the privacy of one's home and person (Fourth Amendment prohibition of unreasonable search and seizure), and the privacy of personal information (Fifth Amendment protection against self-incrimination). The Due Process Clause of the 14th amendment has been held to protect narrowly defined rights relating to family, marriage, motherhood, procreation and child rearing. What is often referred to as a right to privacy is the concept that one's personal information is protected from public scrutiny. Rather than being protected by the Constitution, most privacy rights are created by specific federal or state laws that prohibit certain actions, or prohibit dissemination of protected materials (e.g., confidential health care records, personnel records, student educational records). While I am aware of one federal court lawsuit in Illinois alleging that allowing a transgender student access to the locker room of her gender identity was a violation of the students' right to bodily privacy, the court dismissed the claim, holding that there is no such right in the Due Process Clause of the 14th Amendment to the Constitution. In my opinion, challenges to these revised policies, if passed, would most likely be on grounds other than any general privacy rights. For example, you would more likely see claims for violation of Freedom of Religion under the First Amendment if students are ultimately permitted by regulation to use bathrooms and locker rooms of their gender identities.

While opinions of lower courts are not often published, I review reports of such cases through various education law resources across the country. I am not aware of any lawsuits that have been successful in obtaining a judgment or declaration of unconstitutional conduct against a school division (on privacy or other grounds) for allowing a transgender student to use the locker room or bathroom that corresponds to that student's gender identity. Several lower courts have ruled that policies that prohibit the use of facilities based upon gender identity are improper, but those cases are not binding precedent as they have not been properly appealed or are still awaiting court decisions.

2. Overnight Field Trips. If the School Board implements nondiscrimination policies prohibiting discrimination based upon gender identity, and if regulations put in place sufficiently defined the circumstances under which a student would be recognized and permitted to participate in services and activities based upon their gender identity, then it could be considered discriminatory to prohibit a transgender student from staying in the same room as others of the biological sex with which the transgender student identifies.

3. Litigation Risks if Pass or Not Pass. This question was addressed above, but I will reiterate that the reality of the situation is that any School Board can be sued if the appropriate factual circumstances exist whether or not it passes these additions to the nondiscrimination policies. Whether or not these new policies are passed, lawsuits could still be filed against any school division asserting that discrimination has occurred – their basis will be claims of violation of Title VI and Title IX and Equal Protection. Because there is currently no legislation, U.S. Supreme Court or U.S. 4th Circuit Court of Appeals rulings on these issues, there are no options that do not create some risk of legal challenge. The question is whether voluntarily passing

policies which protect additional classes of individuals not legally mandated creates more legal risk than not passing the policies. I believe it does. I do not believe the School Board is opening itself up to any lawsuits specifically on the ground that it is not passing such policies, because the law does not require these policies at this time. However, if the School Board does pass these amended policies, any legal challenge could include a claim that the School Board violated its own policy. Further, if the School Board passes these policies, it does lead to the need to promptly make and enforce specific regulations, or at least school-wide consistent procedures, on the bathroom and locker room access based upon gender identity.

4. Consideration of Other Policies and Disciplinary Action for Violating Revised Antidiscrimination Policies. A Board member enumerated a number of policies that could be impacted by the passage of the revised policies. I have identified above the specific policies and regulations that would require amendment upon passage of these revisions. The other policies that are already in effect would already serve to permit disciplinary action (against both employees and students) to be taken should the new revised policies be violated. For example, Regulation 4902-R provides that teachers may be dismissed for...“noncompliance with school laws and regulations.” This would not need amendment because upon passage, the revised policies would be included in the language of the existing Regulation 4902-R. The procedures to be followed to investigate disciplinary infractions currently would apply equally to violations under the revised policies (both the revised policies at issue currently and the policies listed above that require revision). As to student discipline, and as listed above, the Code of Student Conduct (2401-R) would require amendment to include the new protected classes under certain violation definitions, including violation number 8 (Bullying) and violation number 71 (Verbal abuse). Otherwise, violations of any new nondiscrimination policy would be covered under existing language (violence, threats, refusal to follow directions of administrator, etc.). As with any other potential discrimination claims, it is likely that both acts of omission and acts of commission could be considered discriminatory and be subject to disciplinary consequences.

5. Implementing Regulations. Under the proposed language in both revised nondiscrimination policies, the Superintendent/designee would be responsible for developing a plan with the Board’s input and review. The language is unclear as to whether the School Board itself would retain the power to approve (as opposed to simply review) the language of any regulations to be implemented. As explained above, I recommend changing the language to clarify that the School Board must approve regulations under the two policies. A Board member asked about the School Board’s statutory role and responsibility regarding implementation of antidiscrimination policies and employee and student discipline policies. Under Section VIII, Section 7 of the Virginia Constitution, a School Board is vested with the supervisory authority over public schools. Virginia Code Section 22.1-79 defines the “Powers and Duties” of a school board, which include the duties to see that school laws are properly explained, enforced and observed, to operate the public schools and to institute grievance procedures. Virginia Code Section 22.1-78 provides that a school board may adopt “regulations, not inconsistent with state statutes and regulations of the Board of Education, for its own government, for the management of its official business and for the supervision of schools, including but not limited to the proper

discipline of students.” Based upon these duties, it is the School Board’s legal duty and responsibility to develop policies and regulations. It is legally permissible for a school board to assign the duty of development of regulations to its Superintendent. Because of the current legal climate and high potential for legal challenges, if the revised policies are implemented, the School Board should retain the power to specifically vote on any regulations to enforce the nondiscrimination policies in relation to gender identity.

6. Conflict with Virginia High School League. This School Board does not have the legal authority to mandate changes to Virginia High School League rules. A legal challenge to those rules would be made against the VHSL. Because the school division does not have the power to change those rules, it should not be subject to legal liability for any VHSL decision applied to a Stafford County School student.

7. Immediate, Short Term and Long Term Impacts of Adopting Nondiscrimination Policies. Information about potential legal challenges is addressed above, but it is difficult to determine the specific impacts over time to the school division. The immediate impact would likely be publicity about the changes. If no implementing regulations are passed that provide specific guidance on gender identity issues involving restrooms, locker rooms and other programs, and should there be a perceived discriminatory action by the division that affects a student based upon his or her gender identity, there could be a legal challenge in the short term on those issues. As for long term, I expect that the U.S. Supreme Court will rule on this issue and the precedent will be set in the next one to two years.

While the passage of the revised nondiscrimination policies would not necessarily mean that a student of any age would have the right to choose which bathroom and/or locker room the student wishes to use based upon the student’s gender identity, it would make it more likely for a discrimination challenge to occur in such circumstances where a student is denied that right to choose. Because there are no specific regulations on when and under what conditions a student would be permitted to access services based upon gender identity, should any student (parent) feel he or she is not being permitted to access services on such basis, it could easily be labelled as discrimination based upon gender identity under the revised policy. A question was whether lawsuits or EEOC complaints might be more likely. I do not believe the revised policies would increase EEOC complaints, as those are based upon the legally protected classes under federal law and would arguably not be affected by a board’s voluntary protection of additional classes. A lawsuit would be more likely because there would be an additional ground upon which to assert a legal challenge – that being that the School Board violated its own policy. It is important to note, however, that the claims being made for discrimination under the various constitutional and federal statute reasons may continue to be made whether or not the School Board passes these revised policies.

8. Other Virginia School Divisions Passing Nondiscrimination Policies on the Basis of Gender Identity and Sexual Orientation. As of July 2019, it has been reported that 13 school districts (out of approximately 355 of Virginia’s public schools) in Virginia have nondiscrimination protections for students and employees that include sexual orientation and

gender identity: Albemarle, Charlottesville, Loudoun, Arlington, Alexandria, Falls Church, Fairfax, Manassas, Manassas Park, Prince William, Richmond, Norfolk, and Virginia Beach.

9. Successful Lawsuits Challenging Nondiscrimination Policies that Protect Gender Identity and Sexual Orientation. A Board member asked about how many school divisions in Virginia and in the U.S. have been successfully sued for implementing policies that protect gender identity and sexual orientation. Frankly, due to the time it takes to get through the courts and the fact that this is a recent issue, most cases are in the early stages, with none known in Virginia. While lawsuits have been filed against school divisions by parents challenging policies accommodating transgender student's use of sex-segregated facilities on the basis of gender identity, I am not aware of any court having yet struck down such policies. By way of example, there is currently pending in a lower federal court in Michigan a lawsuit filed on behalf of a group of parents and students against the Williamston Community School District due to its policy of accommodating transgender students. The suit contends that the school district, in 2017, added "specially protected categories of 'sexual orientation,' 'gender expression,' and 'gender identity,' to its nondiscrimination policies." It asserts that such changes "seek to silence and punish Plaintiffs' sincerely held religious beliefs and viewpoint." The plaintiffs assert the policy violated their children's rights to share conflicting, sincerely held Christian religious beliefs at school. The school division filed a Motion to Dismiss more than a year ago which has not yet been ruled upon. In July 2019, the ACLU of Michigan intervened in the suit, arguing that the parents failed to claim a single injury or show any harm they have suffered as a result of the policies. The parties are currently awaiting a decision on the Motion to Dismiss.

10. Legal Opinion Differences. Because the issues surrounding discrimination against individuals based upon gender identity and sexual orientation involve personal, policy, religious and other considerations, there are lawyers and other advocates who strongly support their client's positions on both sides of these issues. As explained above, there are valid legal arguments that can be made to support alternative policy decisions, and differences of opinion on the best timing and scope of such policies, due to the lack of statutory law and legal precedent. As with my opinion here, I am an advocate of the Stafford County School Board, and any advice given is intended to benefit my client with an objective reporting of the current state of the law and legal issues, and the challenges and legal risks which could arise before the Board under either scenario. This analysis should make clear that until Congress or the U.S. Supreme Court provide the mandated answer, legal challenges will continue.

Conclusion:

The state of the law regarding the rights of LGBTQ employees and students and what public schools may or must do to accommodate their needs continues to evolve and remains unsettled. There are numerous lawsuits pending around the country challenging both sides of the issue. There are no state or federal laws or legally binding precedent in effect that legally prohibit the School Board from implementing the two proposed policies which add protections in student services and employment for sexual orientation or gender identity. While the School

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Board has the right and power to adopt such revised policies, the Board should be aware that neither Virginia nor Federal law require that nondiscrimination policies include such protections. By adopting these policies, the School Board would be volunteering to add legal protections to classes of people not required by law, which could lead to claims or litigation for violations of the Board's own policies which would not otherwise exist.

With kind regards,

A handwritten signature in black ink, appearing to be 'JLP', written in a cursive style.

Jennifer Lee Parrish

JLP/mdh