



June 4, 2024

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Dear Mr. Barnes and Mr. Motley:

We write on behalf of the River Hill Arab Students Association (“RHHS ASA”), two Palestinian students, one of whom was a member of the River Hill High School Muslim Students Association (“RHHS MSA”), and these students’ parents, to express our concerns regarding censorship of student speech at River Hill High School on multiple occasions since October 2023.¹ As discussed below, the school system’s efforts to suppress student speech violates the First Amendment, and we seek to ensure protection of their constitutional rights going forward.

Since October 7, 2023, violence in Israel and Palestine has become an inescapable topic of public discussion, and the public discourse has not eluded Howard County’s public schools.² As you know, student groups from schools across the county, both in support of Palestine and in support of Israel, have made social media posts, issued public statements, staged walk-outs, organized gatherings, and raised money to support aid to impacted people. We are also living through a time of

¹ The ACLU of Maryland has been alerted to other incidents of censorship across HCPSS, but due to fear and apprehension around doxxing, and anti-Arab racism and Islamophobia in HCPSS and the county, students at other schools did not wish to join this letter. Nevertheless, we hope that by raising representative issues from RHHS with you, we can help ensure that students across HCPSS are protected from violations of the First Amendment and anti-discrimination laws.

² Dr. Michael Martirano, *Message from the Superintendent on Incidents of Hate and Bias, Oct 27, 2023* (Oct. 6, 2023), available at <https://news.hcpss.org/news-posts/2023/10/message-from-the-superintendent-on-incidents-of-hate-and-bias/#:~:text=Michael%20Martirano%20on%20October%202026,students%2C%20staff%2C%20and%20families>; Dr. Michael Martirano, *10-27-2023 Update to 10-26-23 Community Letter from the Superintendent* (Oct. 27, 2023), available at <https://news.hcpss.org/news-posts/2023/10/10-27-2023-update-to-10-26-23-community-letter-from-the-superintendent/>.

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rampant Islamophobia, and anti-Palestinian rhetoric.³ The impact of the school system's actions has been to silence students (and many members of the community at large) from expressing speech on an issue that has deeply personal repercussions, especially so for Arab and Muslim students (including at least one student at RHHS, who has lost dozens of immediate and extended family members in Gaza). As far as we are aware, HCPSS's censorship of students' protected speech has been focused on silencing Arab, Middle Eastern, Muslim and South Asian (AMEMSA) speakers and other speakers in support of Palestine. Such viewpoint discrimination makes the constitutional violation clear.

River Hill High School's Suppression of Student Speech

In the week leading up to October 25, 2023, a student member of the RHHS MSA and a student member of the RHHS ASA, met with the administration to seek permission for students to organize participation in a national student walk-out that was supposed to occur on that date. The RHHS administration initially denied the students' request, stating that the national walk-out was "partisan." Over the course of five meetings with RHHS administrators, the request for a walk out was finally allowed to occur on November 8—but only under strict conditions. That is, students were told by Principal Robert Motley, Assistant Principal Allison Volinsky, Assistant Principal Rick Robb and various other school officials, that only neutral anti-war messages could be displayed or uttered during the walk-out, and no one could say the words "Palestine", "Gaza", "apartheid", or "siege", because these words purportedly indicated a particular political stance that was anti-Israel, and not "inclusive." Assistant Principal Robb told the student organizer that these words were all "too politically charged" or "too partisan." These limitations undermined the very purpose and meaning of the demonstration.

On the day before the walk out, the school sent a notice to RHHS families stating that a "student-organized" walk out would occur the next day. In neutral form, the notice indicated that the walk out would occur on November 8 during "HawkTime", a non-instructional period in the morning. The email notice also indicated that students were free to participate, but that they were not required to do so. On the morning of November 8, the school announced the same message over the intercom, saying that a "student-led" or "student-organized" walk out would occur during HawkTime, concerning the Middle East. The walk out took place at the school field, and lasted for about 30 minutes. During the demonstration, one of the student organizers brought a sign that said "end the siege", written in the colors of the Palestinian flag, which was confiscated by Mr. Motley and later thrown in the trash. Some people were able to bring signs, including signs that said "ceasefire now," "stop the killing", and "end the violence", but no signs mentioning Gaza or Palestine, or containing any message critical of Israel were allowed. Moreover,

³ To be sure, there is indeed a rise in antisemitism as well, but as far as the ACLU of Maryland is aware, the actions of the HCPSS administration demonstrate that they are taking antisemitism seriously and are not censoring students on the basis of their Jewish identity or pro-Israel viewpoints.

some students reported to the students of the RHHS ASA that a school administrator, believed to be Ms. Volinsky, prevented some students from joining the walk-out, telling them to return to their classrooms.

In another instance of censorship, RHHS administrators required the RHHS MSA to remove a post from Instagram. On October 12, 2023, the RHHS MSA president posted on the MSA's social media an image of a Palestinian flag that stated "We Stand in Solidarity with Palestine" with part of the flag in the territorial shape of Palestine. In a meeting with Assistant Principal Volinsky on November 3, 2023, Ms. Volinsky combatively instructed the RHHS MSA to take the post down, in part because she disagreed that the shape of the land was Palestine, as opposed to Israel. Mr. Motley also told the student that the RHHS MSA club sponsor did not want the club to be "political" and a social media post expressing solidarity with Palestine was considered a political statement by the RHHS administration. The RHHS MSA took the post down in compliance with this demand.⁴

Ms. Volinsky also told a member of the RHHS MSA that one of his fellow MSA members was not allowed to wear a pin on school grounds that said "from the river to the sea, Palestine will be free". The student was told that the phrase calls for the "death of all Jews", and shut down the possibility of wearing it without any discussion about the student's motives or message conveyed by wearing the pin. Had she been asked, the student would have explained that the pin calls for Palestinian freedom from oppression across historical Palestine, and does not call for the death of anyone, only a call for freedom. Notwithstanding public disagreement about the meaning of the phrase, Ms. Volinsky made no attempt to understand or have a productive conversation with the student, and instead made an inflammatory statement accusing the student of antisemitism. Using her authority as a school administrator, Ms. Volinsky exerted her own political views over the student's by prohibiting the pin from school. As a result, the student has not worn it at school since.

Following these experiences with the RHHS administration, these members of the RHHS MSA and ASA have felt utterly silenced from advocating for Palestine in school and with their peers, a cause that is personal to them as Palestinian students.

⁴ Shortly before Thanksgiving Mr. Motley told the RHHS MSA student that school officials would be getting further guidance from the Superintendent about what content student groups could post on social media, adding that the Jewish Student Union might also have to remove certain posts. On November 21, 2023, when no further guidance had been provided, the RHHS MSA president put the original post in solidarity with Palestine back up on the MSA's Instagram page. Since then, there continues to be no guidance provided by the school system. We hope that this lack of guidance indicates a change in HCPSS policy to allow student speech on social media in accordance with First Amendment principles.

Anti-Muslim and Anti-Arab Bias

In addition to RHHS censorship of students' speech, disrespect towards AMEMSA students and their parents, and Islamophobic incidents have gone unchecked, disregarding the well-being of AMEMSA students' mental health during this devastating time. Further, rules and policies of the school are being selectively enforced against the AMEMSA community in some instances.

On October 17, 2023, an RHHS ASA and MSA student sought to confront rising Islamophobia by having the morning announcements include the deadly impacts from such hate, citing specifically to the murder of Wadea Al-Fayoume, a six-year-old Palestinian boy near Chicago. He met with Mr. Motley, who denied the request on the grounds that the prepared statement was "too graphic" and that he wanted RHHS to be a "neutral" school, dismissing the severity of the incident by saying "people die every day." In a subsequent meeting with this student's parents,⁵ Mr. Motley tried to explain that his denial of this topic for morning announcements was a miscommunication, and that he instead wanted to work with the student on the language of the announcement. Nevertheless, no announcement about preventing Islamophobia was or has been made.

In another incident, on November 3, 2023, RHHS MSA guests came to the school to give a presentation to the student group, all wearing hijabs. Ms. Volinsky aggressively interrogated them about their purpose for coming to the school, what they planned to talk about, and ultimately refused them entry into the building. As justification for this offensive treatment, Mr. Motley explained that the MSA had not alerted the club sponsor in advance so as to obtain clearance from the main office for the parents to enter the school.⁶ But this policy is not enforced consistently and here appears only to have been enforced, and in such a rude way, because the guests were visibly Muslim. Indeed, at the follow-up meeting Mr. Motley informed the parents that "this was a process he was trying to get students and faculty to better enforce", seemingly admitting that their denial of entry was pursuant to a policy selectively enforced.

Among the many meetings that the RHHS MSA student had with school administrators, the meeting where Ms. Volinsky told the RHHS MSA to take down their Instagram post in solidarity with Palestine was particularly disrespectful. Ms. Volinsky berated the RHHS MSA student about the shape of the country on the

⁵ On November 10, 2023, the RHHS MSA parents, as well as several other community members, met with the RHHS school administration to address Islamophobic incidents that had been occurring at the school. The RHHS administration did not address the concerns raised, and thus they are also the subject of this letter.

⁶ The policy that Mr. Motley appears to have been referring to is the HCPSS visitation policy, but it is unclear whether the visitation policy also applies to invited guest speakers. The policy can be found at: <https://www.hcpss.org/f/mrb/nav/horizontal-top.html#:~:text=Upon%20entering%20a%20school%2C%20all,allowed%20to%20shadow%20HCPSS%20students.>

Instagram post, yelling at him that the country was called “ISRAEL”, not “Palestine.” The student earnestly explained to Ms. Volinsky the history of the territory and its identity as both Israel and Palestine.

In all of the meetings that the River Hill High School administration has conducted with students of the MSA, ASA, and their parents, *the administration has shamefully made no effort whatsoever to check on the wellbeing of the students and their families.* There are at least two Palestinian students at RHHS, and one of them has lost five immediate family members, 45 extended family members and dozens upon dozens of close family friends over the last seven months in Gaza.

Since the RHHS walk out on November 8, these Palestinian students have felt that the school has continued to cast aside the needs of Arab and Muslim students. Newsletters that rightfully honor Black History Month and Women’s History Month overlooked Arab American Heritage Month, and there were deliberate efforts to avoid discussion of Gaza in class, making no effort to discuss an issue that is affecting them daily. In the months following the November walk out, these Palestinian students have felt so emotionally taxed from their experience with their school administration that they lost their inspiration to organize other events or demonstrations at school.

River Hill High School’s Censorship is Unconstitutional

There is no question that schools have a significant role to play in protecting students, which may at times require regulating their speech. However, the viewpoint-based censorship of the messages expressed by these students affiliated with the RHHS MSA and ASA violates both the First Amendment to the U.S. Constitution and Article 40 of the Maryland Declaration of Rights. The U.S. Supreme Court has said time and again that “[n]either students [n]or teachers shed their constitutional rights to freedom of speech or expression at the schoolhouse gate.” *Tinker v. Des Moines Indep. Cmty. Sch. Dist.*, 393 U.S. 503, 506 (1969). The school’s disagreement with the views of students in the MSA and ASA does not authorize these officials to censor student speech based on its content or viewpoint.

Social Media Censorship

While, as discussed below, schools retain authority to limit certain disruptive and offensive speech, a social media post in support of Palestine, saying “I stand with Palestine” is not speech that the school has the prerogative to regulate.

Even assuming that the school may regulate, to some degree, posts on social media accounts for student clubs, the censorship of the MSA and ASA’s social media posts expressing solidarity with Palestine is not permitted under First Amendment principles. Rather, the posting of an image that states “I stand with Palestine” amounts to the kind of “silent, passive, expression of opinion that is unaccompanied by any disorder or disturbance”, akin to the constitutionally protected expressive

conduct in *Tinker v. Des Moines Indep. Cmty. Sch. Dist.*, 393 U.S. 503, 508 (1969). There was no indication that the social media post would cause the kind of disruption that the Supreme Court cautioned about in *Tinker*, and indeed, since the Instagram post was re-posted on November 21, there have been no disturbances whatsoever. Although the Supreme Court has instructed that schools do have some authority to regulate even off campus student speech, like online speech, that authority is more circumscribed than the authority to regulate in-school speech; it does not permit RHHS to censor the MSA’s Instagram post expressing student members’ political opinions. See *Mahanoy Area Sch. Dist. v. B. L. by & through Levy*, 141 S. Ct. 2038, 2045 (2021) (declining to articulate every circumstance where off-campus student speech is allowed to be regulated, but nevertheless reaffirming the *Tinker* substantial disruption standard as the ceiling for regulation of off-campus speech). Here, the stated reason for the Instagram censorship was explicitly because the MSA should not be “political”, according to the RHHS MSA teacher sponsor and RHHS school administrators. Even assuming, for the sake of argument, the applicability of the *Tinker* standard that allows schools greater power to regulate *on-campus* speech, political statements such as “I stand with Palestine”, are precisely the type of non-disruptive speech that retains full First Amendment protection. In fact, even if the political statement was an “unpopular” one, the school has “an interest in protecting a student’s unpopular expression . . . because America’s public schools are the nurseries of democracy.” *Mahanoy*, 141 S. Ct. at 2040.

None of the exceptions to *Tinker*’s prohibition on student censorship can reasonably excuse the school’s censorship in this context. The social media post was not lewd or indecent, *cf. Bethel Sch. Dist. No. 403 v. Fraser*, 478 U.S. 675, 676 (1986) (allowing schools to restrict lewd or indecent speech at school events); nor did it promote illegal behavior, *cf. Morse v. Frederick*, 551 U.S. 393, 395 (2007) (allowing schools to restrict speech promoting illegal drug use). Finally, and crucially, the RHHS MSA’s speech cannot reasonably be seen as bearing the imprimatur of the school, which would permit regulation of speech that is inconsistent with the school’s educational mission (nor is the speech inconsistent with the school’s mission). *Cf. Hazelwood Sch. Dist. v. Kuhlmeier*, 484 U.S. 260 (1988) (allowing school to restrict student speech in school newspaper that is inconsistent with school’s educational mission); see e.g. *Corder v. Lewis Palmer Sch. Dist. No. 38*, 566 F.3d 1219 (10th Cir. 2009) (“[C]ertain expressive activities may be closely tied to a school, yet not school-sponsored speech bearing the school’s imprimatur”); *Westfield High Sch. L.I.F.E. Club v. City of Westfield*, 249 F. Supp. 2d 98, 117-118 (D. Mass. 2003) (student club distribution of candy canes with religious messages did not bear the imprimatur of the school even though the club had a faculty sponsor, used school resources and facilities, and was sanctioned as an official student club by the principal); *L.W. v. Knox Cnty. Bd. of Educ.*, No. 3:05-CV-274, 2006 WL 2583151, at *5 (E.D. Tenn. Sept. 6, 2006) (student-organized, student-led Bible readings were not school-sponsored even though students used school property, held meetings during school hours, and were monitored by teachers); *East High Gay/Straight Alliance v. BOE*, 81 F. Supp. 2d

1166, 1195 (D. Utah 1999) (“Students, parents, and members of the public likely will not perceive student club and group activities as being a *school* function, or as ‘bearing the imprimatur of the school.’”).

Censorship of Student Demonstrations

The same legal principles that undergird the Constitution’s protection against censorship of student social media posts also apply to restrictions on student speech connected to the walk out. When a school reasonably forecasts a substantial disruption or interference with the rights of others, officials may limit student speech. But such restrictions cannot be based on “undifferentiated fear or apprehension of disturbance” or “a mere desire to avoid the discomfort and unpleasantness that always accompany an unpopular opinion.” See *Tinker*, 393 U.S. at 509, 514. See also *M.C. Through Chudley v. Shawnee Mission Unified Sch. Dist. No. 512*, 363 F. Supp. 3d 1182, 1202 (D. Kan. 2019) (denying school’s motion to dismiss First Amendment claims relating to censorship of certain words at an anti-gun demonstration because no other justification was provided besides a desire to avoid controversy); *Mahanoy*, 594 U.S. 180, 193 (2021) (“As we have previously said, simple ‘undifferentiated fear or apprehension ... is not enough to overcome the right to freedom of expression’”) (citing *Tinker*, 393 U.S., at 508); *B.H. ex rel. Hawk v. Easton Area Sch. Dist.*, 725 F.3d 293, 309 (3d Cir. 2013) (denying the school’s ability to restrict student speech because “speech [that] could also plausibly be interpreted as expressing a view on a political or social issue” cannot be censored, citing *Morse v. Frederick* as protecting a student’s right to political speech); see also *Kowalski v. Berkeley Cnty. Sch.*, 652 F.3d 565, 572 (4th Cir. 2011) (citing *Morse* as prohibiting suppression of speech based on political viewpoint).

The school officials’ censorship of the school walk out appears to have been premised on the idea that because the walk out was allowed to occur by school officials, the more permissive standard for regulation of student speech articulated in *Hazelwood v. Kulmeier* should apply. 484 U.S. 260 (1988). We disagree. In order for *Hazelwood* to apply, a school’s “ability to silence a student’s personal expression that happens to occur on the school premises”, must involve “*school sponsored . . . expressive activities*” (emphasis added) and the school’s actions must “reasonably relate to legitimate pedagogical concerns.” *Hazelwood* at 271–273. In addition, it must relate to speech that “[s]tudents, parents, and members of the public might reasonably perceive to bear the imprimatur of the school,” and that can be “fairly characterized as part of the school curriculum.” *Id.* at 271.

As school officials emphasized in their messaging, however, the RHHS walk out was *organized by students* to be conducted during *non-instructional* time, the school did not encourage attendance nor contribute to the content of the walk out (except to limit the students’ speech), and never suggested that the event was at the direction of the school, or part of the curriculum. RHSS’s only contribution was a neutral notification sent out to families the day before, and an announcement at the beginning of the day on November 8 explaining when and where the walk out would take place, that participation was entirely optional, and explicitly stating that

the walk out was “student organized”. To show that a particular event is “school sponsored”, courts require more. *See Robertson v. Anderson Mill Elementary Sch.*, 989 F.3d 282, 289 (4th Cir. 2021) (finding a fourth grade teacher’s compilation of essays into a book to be sent home from school as reasonably bearing the imprimatur of the school); *Collins v. Putt*, 979 F.3d 128, 133 (2d Cir. 2020) (a blog post made in response to a school assignment, under the supervision of a faculty advisor, on a school-offered message board was “school sponsored”); *Fleming v. Jefferson Cnty. Sch. Dist. R-1*, 298 F.3d 918, 930 (10th Cir. 2002) (permanently affixed tile decoration project on the school building that was organized and supervised by the school constituted school-sponsored speech); *Corder v. Lewis Palmer Sch. Dist. No. 38*, 566 F.3d 1219, 1228 (10th Cir. 2009) (finding Valedictorian’s speech at graduation to be school sponsored, articulating test where the “court should appraise the level of involvement the school had in organizing or supervising the contested speech, and noted that certain expressive activities may be closely tied to a school, yet not school-sponsored speech bearing the school’s imprimatur”); *Pena Villasano v. Garfield Cnty. Sch. Dist. 16*, No. 23-CV-01317-RMR, 2023 WL 3687441, at *6 (D. Colo. May 26, 2023) (school graduation sash was considered to be school sponsored speech given the level of school involvement in every aspect of the graduation ceremony, including club regalia). *See also O.T. ex rel. Turton v. Frenchtown Elementary Sch. Dist. Bd of Educ.*, 465 F. Supp. 2d 369, 376–77 (D.N.J. 2006) (finding that an after school talent show where a student sought to sing a religious song was not school sponsored: “School sponsored speech occurs when a public school or other government entity aims ‘to convey its own message’”) (citing *Rosenberger v. Rector and Visitors of Univ. of Va.*, 515 U.S. 819, 833 (1995)). We applaud the Howard County School System for allowing students to utilize school property to assemble and express political opinions in ways that do not disrupt the educational process. But school officials must also adhere to constitutional constraints when doing so.

Here, the schools were not conveying their own message bearing the imprimatur of the school, they were permitting their students to organize and speak through their own event as required by the Constitution and in accordance with the school’s time, place, and manner policies. The schools’ communication to students and parents about the fact that the walkouts were occurring did not convert them into school sponsored events, but was clearly aimed at dissociating the school from the events, and simply providing notice that they were occurring, so that students and parents would not be surprised. Thus, the proper standard in this case is the standard articulated in *Tinker*.

RHHS’s prohibition and censorship of specific words was not sufficiently tailored to prevent disruption nor interference with the rights of others, given the schools’ approval of the walk out. And, indeed, the only justifications offered for the speech restrictions were that administrators considered the speech at issue “too politically charged” or “too partisan.” But that is not a legally sufficient justification. *See Chudley* 363 F. Supp. 3d at 1201 (“Seeking to avoid controversy, without more, is insufficient to demonstrate a material or substantial threat of disruption.”) (citing

Tinker, 393 U.S. at 509–10, 89 S.Ct. 733). Characterizing the speech as “anti-Zionist” or characterizing it as “antisemitic”, does not save the school from this analysis because the speech restrictions remain unlawful viewpoint discrimination and the messages were not sufficiently disruptive to merit restriction. Disagreement with the messages expressed, even by other students, is no different than disagreement with the anti-war messages at issue in *Tinker*, and not a lawful basis to silence that speech.

The HCPSS policy on student assembly underscores the unconstitutionality of the censorship here. Policy 9020 – Students’ Rights and Responsibilities, Section III. D. 1. c. provides that “Students have the right to assemble. Students have the right to freely choose the subject and form of a peaceful demonstration. Schools may set reasonable limits as to the time, place, and manner in which students and student groups may assemble, as long as those restrictions advance legitimate educational goals.” The RHHS students who organized their respective demonstrations had a clear right to do so under Policy 9020, subject to reasonable time, place, and manner restrictions. As explained above, those restrictions cannot constitutionally restrict the messages of the students simply because they are “too political.” Further, RHHS administrator Ms. Volinsky’s actions preventing students from attending the walk out were in violation of the students’ rights under both the Constitution and Policy 9020.

Requiring the students to censor their demonstrations and social media pages in the manner that RHHS required of them, as well as RHHS’s prevention of some students from attending the demonstration on November 8, deprived the students of their rights to free speech under the First Amendment and HCPSS policy. Additionally, censorship efforts exclusively targeting AMEMSA students risks running afoul of Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color, and national origin in programs that receive federal financial assistance. The discrimination felt by Muslim and Arab students at RHHS and in HCPSS more broadly, suggests a worrisome atmosphere of Islamophobia and anti-Arab racism, and merits a strong response from the school system. As you know, the U.S. Department of Education Office of Civil Rights may investigate disparate impact claims, where differential treatment or denial of benefits, including racial harassment of the kind that occurred at River Hill High School, is directed toward students of a particular race or ethnicity.

Moving Forward

Throughout this process, the students at River Hill High School have made every effort to follow the requests and requirements of the school system. At a time of rampant Islamophobia and anti-Palestinian rhetoric, the RHHS administration has contributed to the marginalization of Arab and Muslim students by suppressing their speech on an issue that for some students affect them on a deeply personal level with unimaginable grief and loss. RHHS has been failing their students, and

the ACLU of Maryland will support the students to ensure their constitutional rights are not cast aside.

Moving forward, HCPSS must apply the standard articulated in *Tinker v. Des Moines Indep. Cmty. Sch. Dist.*, 393 U.S. 503 (1969) when analyzing their authority to regulate students' speech related to Palestine and Israel. We will continue to monitor HCPSS to ensure students are not being unlawfully censored. To remedy the past harms done to the students with the MSA and ASA, and their families, we suggest that the school take measures to protect AMEMSA students from Islamophobia, including the suggestion of having a statement during the morning announcements. Finally, the students and their families deserve an apology for the actions taken by the school, and the disrespect exhibited towards them over this school year.

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We of course hope that additional action is not necessary to ensure that HCPSS administrators respect all students' constitutional rights. Please contact us at your first opportunity to discuss a path to protect the rights and wellbeing of all HCPSS students. You can reach us by phone at 667-219-2613 or by email at steiner@aclu-md.org.

Sincerely,



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