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February 4, 2016

Via Regular and Electronic Mail

The Honorable Loretta Lynch
Attorney General of the United States
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, D.C. 20530-0001

RE: Status of requests for civil rights investigations of police departments in North Charleston and Baltimore, and federal criminal investigations of New York City Police Officers

Dear Attorney General Lynch:

On behalf of the NAACP Legal Defense and Educational Fund, Inc. (LDF), I write to respectfully seek your final response to several outstanding requests made by LDF and community leaders seeking federal investigations of certain police departments and individual officers in multiple jurisdictions following the killing of unarmed African-American residents. Specifically, in July 2015, LDF and over two dozen South Carolina leaders submitted a written request for a civil rights investigation of the North Charleston Police Department following the police shooting death of Walter Scott almost a year ago. Also, in a letter dated September 8, 2015, we asked the Department of Justice (DOJ or “the Department”) to include the Baltimore School Police Force in its “pattern or practice” probe of the Baltimore Police Department. To date, we have not received a final written determination from DOJ as to whether these investigations will be undertaken by the Department.

Additionally, we note that there are several pending criminal civil rights investigations opened by the DOJ, or that requests for such investigations have been made to the DOJ in the city of New York. We seek an update on the status of those probes. This includes your pending investigation into the death of Ramarley Graham, who was killed by an officer of the New York City Police Department (NYPD) four years ago this week, and Eric Garner, who was killed by a NYPD officer 18 months ago. Finally, we support the request made by the family of Mohamed Bah for a criminal civil rights investigation of the shooting death of Mr. Bah by NYPD police. We respectfully urge you to complete or open these investigations without further delay.

For decades, the Department has had the authority to open criminal civil rights investigations of law enforcement officers who willfully deprive a person of a right or privilege protected by the Constitution or federal laws,¹ including the right to be free from the use of excessive force.² In 1994, Congress expanded this authority to broader investigations of law enforcement agencies that have engaged in a pattern or practice of unlawful policing.³ In the past seven years of the Obama Administration, DOJ has investigated 23 of the 18,000 law enforcement agencies across the country and is enforcing 16 agreements.⁴ These investigations have been an appropriate exercise of DOJ's authority given the increased public awareness and exposure to police violence against civilians, particularly persons of color, in the past several years.⁵ The number of federal investigations of state and local law enforcement agencies indicates that the DOJ is using its enforcement authority to challenge civil rights violations by police in a measured way.⁶ However, LDF urges you to do more.

Communities across the country have relied on the federal government to exert its authority in police misconduct cases that seem to clearly violate constitutional and federal laws and diminish the public's confidence in law enforcement. The public's reliance on the DOJ's authority to investigate civil rights violations by local law enforcement has increased over the past 18 months, as discriminatory stop, search, ticketing and harassment practices have come to light in cities across the country, and as far too many local jurisdictions have

¹ See, 18 U.S.C. § 242.

² See, e.g., *United States v. Moore*, 708 F.3d 639 (5th Cir. 2013) (affirming the convictions and sentences of two New Orleans police officers for the beating death of a civilian).

³ See, 41 USC § 14141.

⁴ See, U.S. Department of Justice, *Police Reform and Accountability Accomplishments*, <http://www.justice.gov/file/police-reform-and-accountability-fact-sheet/download> (last visited Jan. 29, 2016). See also, U.S. Department of Justice, *Testimony of Vanita Gupta, Senate Subcommittee on Oversight, Agency Action, Federal Rights and Federal Courts*, 4 (Nov. 17, 2015), <http://www.judiciary.senate.gov/imo/media/doc/11-17-15%20Gupta%20Testimony.pdf>.

⁵ See, Maya Rhodan, *U.S. Attorney Launches Civil Rights Investigation Into Michael Brown Shooting*, TIME Magazine, Apr. 13, 2014, <http://time.com/3109154/michael-brown-civil-rights-ferguson/>; *Death of Teen Shot by CPD Officer 16 Times Focus of Federal Investigation*, CBS Chicago, Apr. 13, 2015, <http://chicago.cbslocal.com/2015/04/13/death-of-teen-shot-by-cpd-officer-16-times-focus-of-federal-investigation/>; Mark Puente and Doug Donovan, *Justice Department opens probe into death of Freddie Gray*, The Baltimore Sun, Apr. 21, 2015, <http://www.baltimoresun.com/news/marvland/crime/bs-md-gray-federal-probe-20150421-story.html>.

⁶ See, NAACP LDF's Testimony Before the United States Senate Committee on the Judiciary Subcommittee on Oversight, Agency Action, Federal Rights and Federal Courts at 4 (November 17, 2015), <http://www.naacpldf.org/document/ldf-testimony-senate-judiciary-committee%E2%80%99s-subcommittee-oversight-agency-action-federal-rig>.

demonstrated either an unwillingness or inability to charge and convict police officers who brutalize or kill unarmed African Americans.⁷ This increased urgency should compel the Department to respond as expeditiously as possible to all outstanding requests for civil rights investigations, and to deploy all necessary resources to undertake these investigations in a timely manner.

I. The Request to Conduct a Pattern and Practice Investigation of the North Charleston, South Carolina Police Department

On July 13, 2015, LDF and over two dozen South Carolina leaders submitted a letter to your office requesting that the DOJ open a “pattern or practice” investigation of the North Charleston Police Department (NCPD).⁸ This request was based on the April 2015 killing of Walter Scott by former NCPD officer Michael Slager and news reports setting out in detail encounters between African-American residents and the North Charleston police. A subsequent “People’s Town Hall Meeting,” convened by LDF and others on October 13, 2015, bolstered the request for a federal civil rights investigation as residents detailed their experiences with local law enforcement. Collectively, these incidents support the need for a federal pattern or practice investigation of NCPD.

On April 4, 2015, former officer Michael Slager stopped Walter Scott, a 50-year-old African-American man, for a broken brake light.⁹ Contrary to initial police reports that the officer feared for his life,¹⁰ video footage from a bystander’s cell phone showed Mr. Scott running away from the officer, who shot him multiple times in the back, killing him.¹¹ The officer has been charged with murder and is awaiting trial, which is scheduled for October 31, 2016.¹² However, Mr. Scott is just one victim of police misconduct in North Charleston.

⁷ See, e.g., Ray Sanchez and Simon Prokupez, *Protests after N.Y. cop not indicted in chokehold death; feds reviewing case*, CNN, Dec. 4, 2014, <http://www.cnn.com/2014/12/03/justice/new-york-grand-jury-chokehold/>.

⁸ See, Letter from Sherrilyn Ifill, President and Director Counsel, NAACP LDF to the Honorable Loretta Lynch, Attorney General of the United States (July 13, 2015) =, <http://www.naacpldf.org/document/naacp-ldf-et-al-letter-attorney-general-lynch-re-north-charleston>.

⁹ See, Andrew Knapp, *Attorney: North Charleston police officer felt threatened before fatal shooting*, The Post and Courier, Apr. 6, 2015, <http://www.postandcourier.com/article/20150406/PC16/150409558/1177/north-charleston-police-say-officer-who-fatally-shot-man-pulled-him-over-because-of-brake-light>.

¹⁰ *Id.*

¹¹ See, Andrew Knapp, *North Charleston Officer Faces Murder Charge After Video Shows Him Shooting Man in Back*, The Post and Courier, Apr. 7, 2015, <http://www.postandcourier.com/article/20150407/PC16/150409468>.

¹² See, Catherine E. Shoichet and Chandler Friedman, *Walter Scott case: Michael Slager released after posting bond*, CNN, Jan. 5, 2016, <http://www.cnn.com/2016/01/04/us/south-carolina-michael-slager-bail/>.

Indeed, there is evidence that the NCPD has engaged in a pattern or practice of racially-biased policing for years. According to news reports, thousands of people, disproportionately African-American individuals, have been stopped by North Charleston police officers without being arrested or receiving a citation,¹³ or have been physically assaulted by police.¹⁴ This includes the brutal beating of Sheldon Williams in a hotel room in November 2011. Although he reportedly did not resist arrest after being served with a warrant, North Charleston officers “pinned [Williams] to a concrete floor, trapping him within the bedframe, repeatedly stomping on his face...while [he] was handcuffed.”¹⁵ Williams suffered multiple broken bones in his face. The officers who assaulted Mr. Williams remain employed by the NCPD.¹⁶

On October 13, 2015, at the request of community groups, LDF convened a “People’s Town Hall Meeting” in North Charleston. At this meeting, African-American residents testified about their experiences of being racially profiled, followed and ticketed by North Charleston police. They described the conduct of officers towards residents suffering from mental illness, and a pattern of irrational code enforcement against African-American residents. One resident eloquently described the view shared by the African-American community about police and political leadership in the city: “All they care about is...tickets and fines and locking us up.”¹⁷

In fact, there is evidence that North Charleston police officers have engaged in the misuse of law enforcement power to raise revenue and/or to meet arbitrary numerical quotas for ticketing and arrests—similar to conduct that the DOJ exposed in such great detail in its report on the Ferguson, MO police department. For

¹³ See, David Graham, *The Shockingly Familiar Killing of Walter Scott*, The Atlantic, Apr. 8, 2015, <http://www.theatlantic.com/national/archive/2015/04/the-shockingly-familiar-killing-of-walter-scott/390006/>. See also, Glenn Smith and Tony Bartelme, *Pull Over: Practice of pretext stops under fire*, The Post and Courier, Aug. 1, 2015, <http://www.postandcourier.com/article/20150801/PC16/150809965>.

¹⁴ See, e.g., Jeff Stein, *It wasn’t just Walter Scott: The North Charleston Police Department has a shocking record of abuse allegations*, Salon, Apr. 8, 2015, http://www.salon.com/2015/04/08/it_wasnt_just_walter_scott_the_north_charleston_police_department_has_a_shocking_record_of_abuse_allegations/.

¹⁵ *Id.*

¹⁶ See, John Swaine, *Second officer in Walter Scott video sued over alleged attack on handcuffed man*, The Guardian, Apr. 9, 2015, <http://www.theguardian.com/us-news/2015/apr/09/second-officer-walter-scott-video-sued-stomping>; Complaint at 3, *Williams v. N. Charleston Police Dep’t*, Civil Action No.: 2:14-CV-4453-DCN-BM (D.S.C. Nov. 18, 2014).

¹⁷ See, Transcript, North Charleston Town Hall Meeting at 37, Oct. 13, 2015 (on file at LDF).

example, during a pre-trial hearing in the case against Officer Michael Slager, attorneys for Slager reportedly admitted that their client stopped Walter Scott that fateful day to meet the NCPD's mandatory quota of three traffic stops per day.¹⁸

LDF and South Carolina community leaders transmitted a formal request to the DOJ seeking a pattern or practice investigation of the NCPD and a criminal civil rights investigation of Officer Slager.¹⁹ Consistent with DOJ's previous announcement that it would investigate Slager, in December 2015, federal prosecutors reportedly sent a "target letter" to a South Carolina Solicitor indicating an interest in filing federal criminal charges against the officer.²⁰ Nevertheless, DOJ has not provided a written determination in response to our request for a broader investigation into the practices of the NCPD.

II. DOJ's Civil Rights Investigation of the Baltimore Police Department Should Include a Probe of the Baltimore School Police Force

Following the police in-custody death of Freddie Gray, a 25-year-old African-American man, and the countless number of complaints filed against the Baltimore Police Department (BPD) over the years,²¹ the DOJ opened a civil rights investigation of the BPD in May 2015 to determine whether its officers have engaged in a pattern or practice of unlawful policing.²² In a September 2015 letter to DOJ, LDF noted that officers of the Baltimore School Police Force have also used force against its predominantly African-American student body, including the police assault of three middle school girls.²³ One of the girls sustained a head injury after

¹⁸ See, Kira Lerner, *The 'Three Stops' Rule That Killed Walter Scott*, Think Progress, Nov. 3, 2015, <http://thinkprogress.org/justice/2015/11/03/3713774/north-charleston-police-quotas/>.

¹⁹ See, NAACP LDF's Request for Federal Investigations of the North Charleston Police Department and the Police-Involved Shooting Death of Walter Scott dated July 13, 2015, <http://www.naacpldf.org/document/naacpldf-et-al-letter-attorney-general-lynch-re-north-charleston>.

²⁰ See, Andrew Knapp, *Feds Seek to Charge North Charleston police office in Walter Scott shooting death*, Dec. 4, 2015, <http://www.postandcourier.com/article/20151204/PC16/151209762>.

²¹ See, Mark Puente, *Undue Force*, Baltimore Sun, Sept. 28, 2014, <http://data.baltimoresun.com/news/police-settlements/>.

²² See, Sari Horowitz, *Justice Department to launch a federal investigation of Baltimore police*, The Washington Post, May 7, 2015. https://www.washingtonpost.com/world/national-security/justice-department-to-launch-federal-investigation-of-baltimore-police/2015/05/07/b3a422da-f4d4-11e4-b2f3-af5479e6bbdd_story.html.

²³ See, Letter from Monique L. Dixon, Deputy Director of Policy, LDF to Vanita Gupta, Principal Deputy Assistant Attorney General dated Sept. 8, 2015, http://www.naacpldf.org/files/case_issue/NAACP%20LDF%20Letter%20to%20DOJ%20requesting%20expansion%20of%20fed%20investigation%20to%20school%20police.pdf.

being struck by the school police officer's baton. A grand jury indicted the officer, who later pled guilty to assault charges.²⁴

We also noted that the Baltimore City Public School System and the BPD have entered into a Memorandum of Understanding that allows school police officers to engage in law enforcement activities citywide. Specifically, the Memorandum of Understanding between the BPD and school system makes clear that school police may “exercise full police power anywhere within the jurisdiction of the City of Baltimore.”²⁵ After several discussions, DOJ staff recently expressed a verbal commitment to investigate this relationship between BPD and school police.

Based on recent news articles and our understanding from conversations with community leaders, it is apparent that your investigation in Baltimore is at an advanced stage. Yet, we have not received a final written determination about whether the school police will be included in the DOJ's investigation of the BPD.

We caution the DOJ against leaving a gap in its comprehensive review of the Baltimore Police by excluding the school police. We remind you that, last summer, Mr. Samuel DuBose was killed by an officer of the University of Cincinnati police.²⁶ The University's police were not included in DOJ's 2002 Memorandum of Agreement with the City of Cincinnati, which resulted from a “pattern or practice” investigation of the Cincinnati Police Department,²⁷ even though University police were—until Mr. DuBose's death—authorized to patrol in neighborhoods outside the University of Cincinnati campus. As a result, University police were not subject to the rigorous policy changes, training, and management improvements imposed by

²⁴ See, Saliqa Khan, *School Police Officer Pleads Guilty to Assault of 3 Students*, WBAL TV 11, Sept. 25, 2015, <http://www.wbaltv.com/news/school-police-officer-pleads-guilty-to-assault-of-3-students/31567264>.

²⁵ See, Memorandum of Understanding Between the Baltimore City Public School System and the Baltimore Police Department at 1 (June 26, 2007). See also, Baltimore City Public Schools, *School Authority* (stating that “School Police has entered into a “Concurrent Jurisdiction Agreement” with the Baltimore Police Department, [which has given it] ... “City-Wide” Authority to enforce the law within the limits of the City of Baltimore), https://cityschoolsinside.bcps.k12.md.us/Departments/School_Police/Authority.asp (last visited Feb. 4, 2015).

²⁶ See, Richard Perez-Pena, *University of Cincinnati Officer Indicted in Shooting Death of Samuel Dubose*, The New York Times, Jul. 29, 2015, <http://www.nytimes.com/2015/07/30/us/university-of-cincinnati-officer-indicted-in-shooting-death-of-motorist.html>.

²⁷ See, Memorandum of Agreement between the United States Department Justice and the City of Cincinnati, Ohio and the Cincinnati Police Department (April 12, 2002), <http://www.justice.gov/crt/memorandum-agreement-between-united-states-department-justice-and-city-cincinnati-ohio-and>.

the Memorandum of Agreement. The University of Cincinnati police officer who killed Dubose has been indicted on murder charges and a pretrial hearing is scheduled for February 11, 2016.²⁸

The killing of Samuel DuBose demonstrates the danger of under-inclusiveness in DOJ pattern or practice investigations, and supports our recommendation that the Department include the Baltimore school police in its investigation of the BPD.

III. The Fatal Police Shooting of Ramarley Graham – New York, NY

On Feb. 2, 2012, several New York City Police Department (NYPD) officers followed Ramarley Graham, an 18-year-old African-American male, into his grandmother's Bronx, NY apartment believing that the young man possessed a gun. Officer Richard Haste fatally shot Mr. Graham as his 6-year-old brother and grandmother watched.²⁹ Police never found a gun.³⁰ After a judge dismissed an initial grand jury's indictment of Officer Haste, and a second grand jury declined to indict him, in 2013, DOJ opened a criminal civil rights investigation of the officer.³¹ As the Graham family anxiously awaits the outcome of DOJ's investigation, according to news reports, Officer Haste remains a member of the NYPD and reportedly has received almost \$25,000 in pay raises over the past four years.³²

²⁸ See, Andrew Setters, *No trial date set in former UC Officer Ray Tensing Murder Trial*, Dec. 16, 2015, <http://www.wlwt.com/news/pretrial-hearing-today-in-former-uc-officer-ray-tenings-murder-trial/36970046>.

²⁹ See, Christopher Mathias, *Pressure Mounts to Investigate NYPD Killing of Unarmed Black Teen, Ramarley Graham*, The Huffington Post, Apr. 16, 2014, http://www.huffingtonpost.com/2014/04/16/ramarley-graham-eric-holder- n_5160910.html.

³⁰ See, Christopher Mathias, *Ramarley Graham's Mother Tells DOJ to Stop Dragging Its Feet*, The Huffington Post, Jul. 24, 2015, http://www.huffingtonpost.com/entry/ramarley-grahams-mother-tells-doj-to-stop-dragging-its-feet_us_55b251b3e4b0224d8831eb6b.

³¹ See, Jeff Mays, *U.S. Attorney's Office to Review to Review NYPD Shooting Death of Ramarley Graham*, DNAinfo.com New York, Aug. 8, 2013. <https://www.dnainfo.com/new-york/20130808/concourse/ramarley-grahams-parents-call-for-federal-investigation-of-sons-death>. See also, Jeff Mays, *Family of Ramarley Graham, Bronx Teen Killed By NYPD, Fills Courtroom As Judge Clears Way For Civil Case*, The Huffington Post, Jan. 8, 2014, http://www.huffingtonpost.com/2014/01/08/ramarley-graham-civil-case-nypd-killing- n_4561072.html.

³² See, Christopher Mathias, *Cop Who Gunned Down Ramarley Graham Gets A Raise*, The Huffington Post, Dec. 21, 2015, http://www.huffingtonpost.com/entry/ramarley-graham-nypd-richard-haste_us_567455d4e4b0b958f6567aa0.

This week marked the passing of the fourth anniversary of Mr. Graham's death. Yet there has still been no determination by the DOJ as to the results of an investigation into his killing.

IV. The Fatal Police Shooting Death of Mohamed Bah – New York, NY

On September 25, 2012, Hawa Bah called 911 to request an ambulance for her son Mohamed Bah, a 28-year-old Black man, who was showing signs of depression. Instead of medical emergency personnel, NYPD officers arrived and, without a warrant, reportedly forced their way into Bah's apartment with guns drawn and shot Mr. Bah multiple times, including in the head, killing him.³³ The NYPD claimed that Mr. Bah lunged at the officers with a knife.³⁴ A year later, a grand jury did not indict the officers involved,³⁵ and attorneys for the Bah family filed a civil lawsuit against the NYPD.³⁶

In October 2015, attorneys for the Bah family announced that they had uncovered evidence during the civil lawsuit that suggested that Mr. Bah did not have a knife and that police reports contained contradictory facts.³⁷ For example, police told reporters that an officer was treated for a stab wound, but none of the officers reported being stabbed to the medical staff.³⁸

Given this new evidence showing that NYPD officers seemingly used excessive and lethal force against Mohamed Bah, who posed no threat and committed no crime, LDF joins the Bah family's request that the DOJ open a criminal civil rights investigation of the officers involved in their loved one's death.

³³ See, *NYPD 'executed and covered up' killing of depressed immigrant – family attorney*, RT America, Oct. 8, 2015, <https://www.rt.com/usa/317961-mohamed-bah-nypd-execution-coverup/>.

³⁴ See, Christopher Mathias, *NYPD Killing of Mohamed Bah Was 'An Execution and a Cover Up:' Lawyers*, Huffington Post, Oct. 15, 2015, http://www.huffingtonpost.com/entry/mohamed-bah-nypd_us_561545e0e4b0fad1591a4f27.

³⁵ See, Shayna Jacobs, *Grand jury declines to indict officers involved in Mohamed Bah shooting*, The Daily News, Nov. 27, 2013, <http://www.nydailynews.com/new-york/grand-jury-declines-indict-officers-involved-mohamed-bah-shooting-article-1.1531208>.

³⁶ See, Julia Dahl, *Family of man killed by NYPD suing the city, seeking better training to deal with the mentally ill*, CBS News, Sept. 24, 2013, <http://www.cbsnews.com/news/family-of-man-killed-by-nypd-is-suing-the-city-seeking-better-training-to-deal-with-the-mentally-ill/>.

³⁷ See, Christopher Mathias, *NYPD Killing of Mohamed Bah Was 'An Execution and a Cover Up:' Lawyers*, Huffington Post, Oct. 15, 2015, http://www.huffingtonpost.com/entry/mohamed-bah-nypd_us_561545e0e4b0fad1591a4f27.

³⁸ *Id.*

V. The Fatal Police Chokehold of Eric Garner – Staten Island, NY

On July 17, 2014, a bystander's cell phone videotaped Eric Garner, a 43-year-old Black man, speaking with NYPD police officers who stopped and questioned him on suspicion of selling untaxed cigarettes.³⁹ In an effort to arrest him, Officer Daniel Pantaleo placed Mr. Garner in a chokehold. After repeatedly telling officers, "I can't breathe," Mr. Garner lost consciousness and died moments later.⁴⁰ The medical examiner ruled his death a homicide caused by the chokehold.⁴¹

Months later, a grand jury declined to indict Officer Pantaleo on criminal charges even though the chokehold was banned under NYPD policy.⁴² DOJ launched a criminal civil rights investigation into Eric Garner's death in December of 2014,⁴³ and over a year later, the Garner family awaits the outcome of this investigation. We urge DOJ to fulfill its promise of conducting "an independent, thorough, fair and expeditious investigation."⁴⁴

Conclusion

For decades, the DOJ has used its authority to investigate individual officers and entire police departments who engaged in unlawful conduct that has harmed civilians. As a result, it has uncovered police violence and racially-biased policing that communities of color have known about and experienced first-hand for years. The investigations have also offered reforms that have the potential to eradicate wrongful conduct and rebuild trust between police and the communities they serve.

³⁹ See, Josh Sanburn, *Behind the Video of Eric Garner's Deadly Confrontation With New York Police*, Time, Jul. 22, 2014, <http://time.com/3016326/eric-garner-video-police-chokehold-death/>.

⁴⁰ See, Ryan Parker and Christina Littlefield, *Eric Garner death case settled; New York City to pay his family \$5.9 million*, The Los Angeles Times, Jul. 13, 2015, <http://www.latimes.com/nation/nationnow/la-na-nn-eric-garner-settlement-20150713-story.html>.

⁴¹ See, Ray Sanchez, *Chokehold by cop killed NY man, medical examiner says*, CNN, Aug. 2, 2014, <http://www.cnn.com/2014/08/01/justice/new-york-choke-hold-death/>; See also CBS News and Associated Press, *Grand jury votes not to charge cop in Eric Garner death*, Dec. 3, 2014, <http://www.cbsnews.com/news/nypd-chokehold-death-grand-jury-votes-not-to-charge-cop-in-eric-garner-case/>.

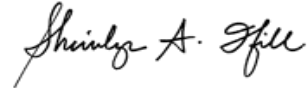
⁴² See, CBS News and Associated Press, *Grand jury votes not to charge cop in Eric Garner death*, Dec. 3, 2014, <http://www.cbsnews.com/news/nypd-chokehold-death-grand-jury-votes-not-to-charge-cop-in-eric-garner-case/>.

⁴³ See, U.S. Department of Justice Office of Public Affairs, *Statement by Attorney General Holder on Federal Investigation Into Death of Eric Garner*, Dec. 3, 2014, <http://www.justice.gov/opa/speech/statement-attorney-general-holder-federal-investigation-death-eric-garner>.

⁴⁴ *Id.*

We recognize that the resources available to the DOJ for these investigations are limited. But as our requests have amply demonstrated, your attention is urgently needed in the matters we identify in this letter. We remain available to assist you with any questions or concerns you may have regarding these requests. Please do not hesitate to contact Monique Dixon, Deputy Director of Policy, or me, at 202-682-1300, if we can be of any assistance in your deliberations.

Sincerely,

A handwritten signature in cursive script that reads "Sherrilyn A. Ifill".

Sherrilyn A. Ifill
President and Director Counsel

cc: Vanita Gupta, Principal Deputy Assistant Attorney General, Civil Rights
Division, U.S. Department of Justice