

CAN THEY REALLY SAY THAT? LEGAL CONSIDERATIONS RELATED TO CAMPUS FREE SPEECH AND EXPRESSION

**Webinar
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Can They Really Say That? Legal Considerations Related to Campus Free Speech and Expression

Emily P. Bothfeld, Jessica A. Milligan and Samuel B. Cavnar

April 15, 2020

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1

Today's Agenda

- First Amendment Basics
- The Forum Concept
- Regulation of Student Speech
- Event Planning for Student Expressive Activities
- Regulation of Employee Speech
- Employee Social Media Use
- Risk Management for On-Campus Events

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2

Although the information contained herein is considered accurate, it is not, nor should it be construed to be legal advice. If you have an individual problem or incident that involves a topic covered in this document, please seek a legal opinion that is based upon the facts of your particular case.

First Amendment Basics



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3

Introduction to the First Amendment

- “Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of the people peaceably to assemble, and to petition the government for a redress of grievances.” U.S. Const. amend. I.
- The U.S. Supreme Court has held the First Amendment applicable to the States and local governments.

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4

Unprotected Categories of Speech

- Courts have held that certain types of speech fall outside the protection of the First Amendment. Such unprotected categories of speech include:
 - Speech that is not intended to convey a particular message likely to be understood by people who hear or see it. *Texas v. Johnson*, 419 U.S. 397 (1989).
 - Speech that is obscene, defamatory, or amounts to “fighting words” likely to incite an immediate breach of the peace, or by their very utterance inflict injury.
 - Speech deemed to be a “true threat.” *Virginia v. Black*, 538 U.S. 343, 360 (2003).

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The Forum Concept



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6

The Forum Concept

- When the government denies a request from a person or group to engage in private expressive activity on property owned or controlled by the government (i.e. a quad, a library, a performing arts center, a college's website or other public channel of communication), First Amendment freedom of speech issues may arise.

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7

The Forum Concept

- Content neutrality – government must treat all expression the same, regardless of the substance or message of the expression
- Viewpoint neutrality – government must not favor or disfavor one viewpoint on a particular subject
- Type of neutrality required depends on the type of “forum”

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Forum Analysis

- To decide the extent to which government may limit or regulate freedom of private expression on public property, courts first consider the nature of the particular property involved, taking into account:
 - its traditional use;
 - physical characteristics and location;
 - actual uses made and purposes of the space or communications channel; and
 - the government's intent and policy regarding its use.

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9

Forum Analysis

- Speech receives greatest protection in "traditional public forums" – such as streets and parks, long used by citizens as places for assembling to discuss public questions.
 - Restrictions in such places must pass "strict scrutiny" – that is, be narrowly drawn to serve a compelling governmental interest.
 - Content neutrality is required.

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Forum Analysis

- Strict scrutiny also applies to limits on speech in a “designated public forum” – a place or communication channel that is not historically a traditional forum, but that government has opened up to the public at large by policy or practice, treating it as like a traditional public forum even though it would not be classified as one.
 - Content neutrality is required.

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11

Forum Analysis

- If particular property isn’t a public forum by tradition or designation, government may restrict communication there to the property’s intended purpose, opening access to such a “limited public forum” only to certain groups, or for discussion of certain subjects.
 - Viewpoint neutrality is required.

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12

Forum Analysis

- **Not all government property is a public forum.** The First Amendment does not guarantee access to property for “speech” purposes simply because government owns or controls the property.
- Government property that is not open for expressive activity period, either by tradition or designation, is a “non-public” forum.
 - *Note: Viewpoint neutrality is still required.

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13

Forum Analysis

- A single campus can have multiple different types of forums:
 - Traditional public forum – Campus Quadrangle?
 - Designated forums for indoor display or distribution of literature (e.g. from tables, on bulletin boards or kiosks, or in display cases)
 - Designated forums for outdoor distribution of literature (e.g. from tables, or by leafleting on sidewalks)
 - Designated locations for holding meetings or demonstrations
- Be intentional about forum designations and ensure such designations are documented/publicized.

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Regulation of Student Speech



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Regulation of Student Speech

“The College classroom with its surrounding environs is peculiarly the ‘marketplace of ideas,’ and we break no new constitutional ground in reaffirming this Nation’s dedication to safeguarding academic freedom.” *Healy v. James*, 408 U.S. 169, 180–81.

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Regulation of Student Speech

- In general, courts will uphold a college's regulation of a student's speech activity only if the college can prove that the speech (a) caused (or would cause) a substantial and material disruption to the work and discipline of the school, and/or (b) falls under another category of speech that is unprotected by the First Amendment.

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17

Substantial and Material Disruptions

- Educational authorities are not required to wait for harm or material disruption to occur before taking appropriate action.
- However, "a mere desire to avoid the discomfort and unpleasantness that always accompany an unpopular viewpoint" or "an urgent wish to avoid the controversy which might result from the expression" are not sufficient to justify banning student speech." *See Tinker v. Des Moines Indep. Cmty Sch. Dist.*, 393 U.S. 503, 509–10 (1969).

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Event Planning for Student Expressive Activities



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Event Planning for Student Expressive Activities

"As the current wave of student activism continues to unfold across the country, campuses are increasingly confronted with managing challenging situations. When a controversial speaker is scheduled to appear and protests are likely, [colleges] may need to thread a needle by simultaneously i) protecting the speaker's right to speak, ii) maintaining a safe environment by imposing lawful time, place and manner restrictions, and iii) reaffirming core institutional values through...communications or alternate activities. Successfully navigating these situations requires agreeing on institutional priorities, understanding [a] myriad [of] legal rights and obligations, thoughtful preparation and implementation of any action steps, and, at times, a lot of luck."

Whose Campus Is This Anyway? Practical Strategies for Balancing Competing Perspectives About Student Activism, paper by Traevana Byrd, Marla H. Morgen, and Mike Poterala, presented at 2017 Annual Conference of the National Association of College and University Attorneys.

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20

Event Planning for Student Expressive Activities

- Work with students to make them aware of and to address how the College may manage time-place-manner issues:
 - Notice and approval requirement
 - Size and format of event
 - Location, date and time
 - Composition of audience - who may attend, will news media be allowed

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Event Planning for Student Expressive Activities

- Work with students to make them aware of and to address how the College may manage time-place-manner issues:
 - Marketing of event
 - Whether the College will require presence of staff or security, and if so, who bears the cost of providing these protections
 - Whether organizers may record or stream the event

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Event Planning for Student Expressive Activities

- Think of planning as a dynamic process: active management is needed as events and responses to them evolve.
- Consider that event planning can present the college with teachable moments and opportunities for dialogue and for developing relationships with student groups as the college works together with them through the event cycle.

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Crossing the Line

- When does speech or a demonstration on campus cross the line and require intervention from the staff or administrators?
 - Disruptive conduct
 - Focus on the conduct, not the message

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Crossing the Line

- Best practices for individual staff members or administrators in responding to disruptive conduct by students or student groups:
 - Notify the appropriate administrators and the campus police when a demonstration or speech becomes disruptive, including a description of the specific disruptive conduct.
 - Do not offer any immediate response to cleanse the situation - allow the college to respond with a timely and informed statement.

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Policy/Procedure Recommendations

- Develop a campus policy that affirms the college's commitment to facilitating free expression while maintaining the college's right to institute reasonable time, place and manner restrictions.
- Create procedures outlining required steps for students/student groups seeking to reserve use of space for programs and activities and any other T/P/M regulations.
- Inform students of possible consequences for disruptive conduct and conduct that poses a safety threat.

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Key Takeaways

- While colleges can regulate certain student speech, the threshold for demonstrating that speech falls outside constitutional protection and/or is likely to cause a substantial and material disruption is high.

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Key Takeaways

- If the expressive activity at issue is not constitutionally protected, a college may disallow the speech and, if necessary or appropriate, discipline the speaker(s) in keeping with the provisions of college policies.

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Key Takeaways

- Whether or not the expressive activity is constitutionally protected, if it is concerning to students and staff, the college may consider using a pedagogical approach of turning the occasion into a “teachable moment” for the involved students and/or the larger college community.

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Regulation of Employee Speech



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Public Employee Speech

- Like students, public employee speech is subject to First Amendment protection.
- “It can hardly be argued that either students or teachers shed their constitutional rights to freedom of speech or expression at the schoolhouse gate.”

Tinker v. Des Moines Indep. Comm'ty Sch. Dist., 393 U.S. 503 (1969).

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Academic Freedom and Free Speech

- The concept of Academic Freedom provides faculty and instructors great latitude, or freedom, in how they teach a class or conduct research.
- However, Academic Freedom does not prohibit the College from regulating speech that is subject to regulation under the First Amendment.

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32

Official Duties vs. Private Citizen

- The level of First Amendment protection for public employee speech will depend on whether the employee is speaking:
 - Pursuant to their official duties; or
 - As a private citizen on a matter of public concern.

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Official Duties vs. Private Citizen

- If the employee is commenting in their capacity as an employee for the College, then the communication is unlikely to be protected under the First Amendment.
- Examples: airing a private complaint about a supervisor or employer, or responding to questions from superiors.

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34

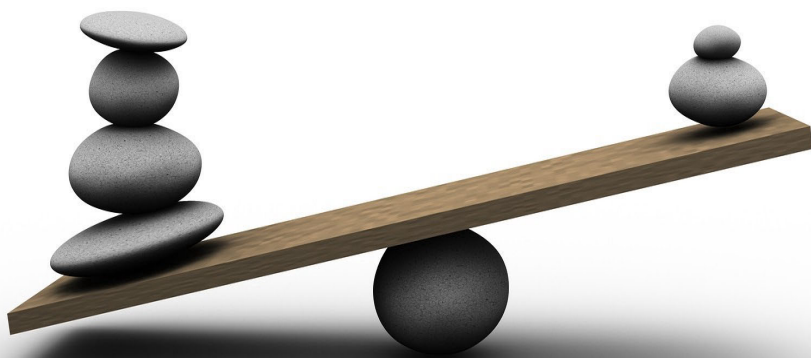
Official Duties vs. Private Citizen

- If the employee is speaking as a private citizen on a matter of public concern, but the comments are disruptive to the educational process or work environment, then the speech could lose its First Amendment protection.

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The *Pickering* Balancing Test



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*Pickering v.
Board of
Education of
THSD 205*
(U.S. S.Ct. 1967).

- Marvin Pickering, a high school science teacher in Will County, Illinois, was terminated after he wrote a letter to the *Lockport Herald* critical of the school board's spending.
- "To sod football fields on borrowed money and then not be able to pay teachers' salaries is getting the cart before the horse."



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*Pickering v.
Board of
Education of
THSD 205*
(U.S. S.Ct. 1967).

- Courts balance:
 - The employee's interest as a citizen speaking on matters of public concern; and
 - The government employer's interest in providing the particular public service efficiently.

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*Pickering v.
Board of
Education of
THSD 205*
(U.S. S.Ct. 1967).

- If the government employer's interest outweighs the employee's interest, then the speech can be suppressed.

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*Pickering v.
Board of
Education of
THSD 205*
(U.S. S.Ct. 1967).

In order for the *Pickering* test to apply:

1. The employee must be addressing a matter of public concern;
2. The speech cannot interfere with the employee's job duties; and
3. The employee must be speaking as a private citizen.

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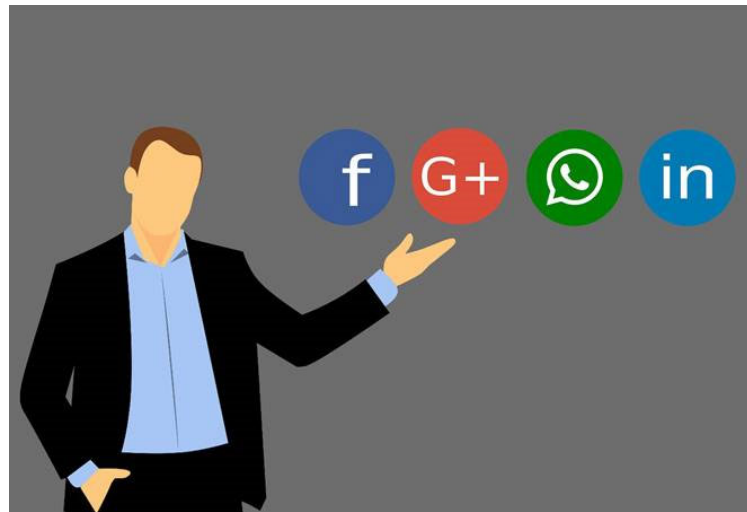
*Pickering v.
Board of
Education of
THSD 205*
(U.S. S.Ct. 1967).

- Consequently, when an employee publicizes his or own private dispute with the public employer, or the speech diminishes the teacher's effectiveness in the classroom, *Pickering* may not afford the teacher protection.

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41

Employee Use
of Social
Media



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42

Social Media

- The College can discipline an employee if the employee's inappropriate social media affects the College because the posting:
 - Is disruptive to the College's operations;
 - Compromises student privacy rights;
 - Violates the College's acceptable use policy; or
 - Otherwise adversely affects the College's academic or work environment.

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43

Social Media

- If a nexus to the College exists, the employee cannot successfully claim that the College lacked authority to discipline for off-duty conduct.
- Evidence of a nexus may include:
 - Parent or student complaints;
 - The employee's inability to perform assigned duties due to the impact of the offensive posting; and
 - Evidence of disruption to College operations.

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Illinois Right to Privacy Act



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Illinois Right to Privacy Act

- Effective January 1, 2017, Illinois amended its Work Place Privacy Statute to further delineate an employee's right to privacy from employer intrusions into his or her social media and online accounts.

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Illinois Right to Privacy Act

- An employer may not request, require, or coerce an employee/applicant to:
 - Provide a username, password or other related account information.
 - Authenticate or access a personal on-line account in the presence of the employer.
 - Invite the employer to join a group affiliated with any personal on-line account of the employee or applicant.
 - Join an on-line account established by the employer, or add the employer to the employee's or applicant's list of contacts.

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47

Illinois Right to Privacy Act

- An employer may:
 - Maintain a lawful workplace policy governing the use of the employer's electronic equipment.
 - Monitor usage of the employer's electronic equipment and the employer's electronic mail.
 - Obtain information about a prospective employee or employee that it is in the public domain.
 - Request or require an employee or applicant to share specific content that has been reported to the employer.

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Illinois Right to Privacy Act

- If an employer inadvertently receives the username, password or any other on-line account information, the employer is not liable for having that information unless:
 - The employer uses that information to access the employee or potential employee's personal on-line account;
 - After the employer becomes aware that such information was received, does not delete the information.

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49

Tips and Best Practices



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Tips and Best Practices

- Develop a factual record that clearly demonstrates why it was reasonable to forecast a material disruption. In cases with a factual record, Courts are less likely to second guess College-imposed restrictions on the expressive activity.
- Judicial deference is even more likely if the record also shows that the College did not opt for censorship as the first resort.

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51

Tips and Best Practices

- Develop policies addressing employee social media use, including:
 - Employees have no expectation of privacy while using College equipment.
 - A reminder that an employee's social media activity may be viewed by colleagues, students, and community members.
 - If an employee chooses to share their personal views as a private citizen, the employee should be clear that they are not acting as a representative of the College.

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52

Outside Speakers and Groups:

Risk Management Considerations



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Expressive Activities by Outside Speakers and Groups

- Examples:
 - Individual seeking to distribute literature or obtain signatures for political campaign
 - Community group requesting outdoor space for a demonstration
 - Third party vendor seeking to use campus conference center to host an industry event

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Expressive Activities by Outside Speakers and Groups

- Forum analysis applies
- Institutions may impose reasonable time-place-manner restrictions

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Outside Speakers and Groups: Understanding the Risks and Liabilities

- Generally, an academic institution is not liable for the conduct or protected speech of third party non-employees while on campus.
- Exception #1: where the conduct or speech creates an unreasonable risk of harm to persons or property, and the institution does not appropriately respond, resulting in injury.
- Exception #2: where the institution treats two similarly situated speakers or groups differently, to one's detriment.

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Outside Speakers and Groups:

Immunities for local public entities and public employees

- The Local Government and Governmental Employees Tort Immunity Act protects “local public entities” and “public employees”:
 - 2-104 / 2-206: immunity for issuing, denying, suspending, or revoking any permit, license, etc., where authorized by enactment to determine whether or not such authorization should be issued. (Includes failure and refusal.)
 - 2-107: immunity for injury caused by action of employee that is libelous or slanderous.
 - 2-201 / 2-109: immunity for local public entity and public employee for determining policy or exercising discretion.

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57

Outside Speakers and Groups:

Best Practices

- Develop and consistently apply clearly-worded board policies and administrative procedures governing use of campus facilities by outside speakers and groups.
- Draft, understand, and consistently use a standard for facilities use agreement for certain higher-risk events.
 - Include indemnification and insurance provisions (with institution included as an additional insured on primary and non-contributory basis).
- Carefully inspect and maintain the facilities and spaces used for speeches, demonstrations and events.
- Provide (or require) appropriate levels of security.
- Promptly report potential claims to your property and/or liability insurers.

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58

Final Tips

- Seek to maintain viewpoint neutrality.
- Manage access to college forums consistently.
- Impose reasonable time/place/manner restrictions.
- To the extent possible, develop a strategy for addressing disruptions.
- Protect against imminent health or safety threats.
- Avoid treating protected speech as actionable misconduct.
- Manage risks with policies *and* practices.

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59

Questions?



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60

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AWARDS

Illinois "Rising Star", by Super Lawyers Magazine, in the area of Construction Litigation (2012-2017)

RECENT PUBLICATIONS

"How Public Sector Entities Can Protect Themselves in Premise Liability Cases," *Chicago Daily Law Bulletin* (2018)

"Property Tax Exemption for Charitable Remains Gray Area," *Chicago Daily Law Bulletin* (2017)

Contributing author, "Organization, Finance, and Property," *Illinois School Law*, IICLE (2017)

"School District and Zoning Exemptions," *Chicago Daily Law Bulletin* (2015)

RECENT PRESENTATIONS

Statutory Requirements and Ethical Considerations for Public Officials, Illinois GFOA Annual Conference (September 2019)

Public Procurement for Construction Projects, ICCCFD Conference (April 2018)

Public Procurement for Construction Projects, Cotter Consulting (January 2018)

Competitive Bidding and Contract Administration, IAPD/IPRA Soaring to New Heights Conference (January 2018)



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Legal Considerations Related to Renewable Energy, Sustainability for PK-12 Schools, IASB/IASA/Illinois ASBO 85th Joint Annual Conference (November 2017)

Best Practices for Bidding and Contracting, Illinois Council of School Attorneys, In-House Counsel Networking Meeting (October 2017)

Construction Contract Boilerplate Terms: Spotting the Top Dangers, National Business Institute (June 2017)

Top School Construction Problems and Solutions, IASB/IASA/Illinois ASBO Joint Annual Conference - Carousel of Panels (November 2016)

Construction Defects: Litigation Insurance Coverage Claims A-Z, National Business Institute (August 2016)

Contracts 101: Forms and Best Practices for Sustainable Schools, Illinois ASBO (February 2016)

Critical Decisions: Selecting the Project Team, Construction Law Workshop, HalfMoon Education, Inc. (March 2015)

Best Practices for Completing and Closing Out Your Project, Construction Law Workshop, HalfMoon Education, Inc. (March 2015)

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Prior to joining Robbins Schwartz, Emily represented students with disabilities in special education matters. Emily attended the George Washington University Law School, where she was a member of the George Washington International Law Review and the GW Law Moot Court Board. Prior to attending law school, Emily taught high school mathematics and science in Hangzhou, China.

RECENT PUBLICATIONS

"Disabled Athlete Can't Support ADA Claims," *Chicago Daily Law Bulletin* (2018)

RECENT PRESENTATIONS

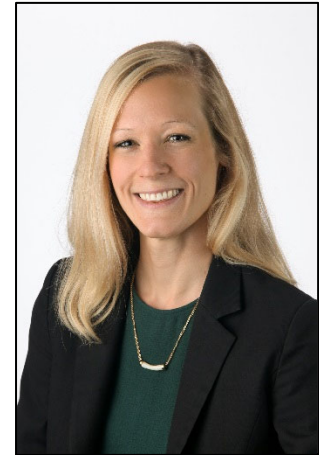
Legislative Update: A Review of New (and Proposed) Laws Affecting Illinois Community Colleges' Risk Management Practices, Illinois Community College Chief Financial Officers Fall Conference (October 2019)

A Student's "Right" to a College Education: Due Process Rights in Academic and Non-Academic Discipline, Illinois Community College Chief Student Services Officers' Summer Meeting (June 2019)

Updates and Recent Developments out of the U.S. Department of Education, Chicago Bar Association Education Law Committee Spring Seminar (March 2019)

Legal Hot Topics for Nursing Program Administrators and Faculty, Illinois Organization of Associate Degree Nursing (March 2019)

The Ever-Changing Landscape Under Title IX, Joint meeting of Illinois Community College Presidents, Chief Academic Officers and Chief Student Services Officers (January 2017)



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U.S. District Court for the Northern District of Illinois

Supreme Court of Illinois

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Chicago Bar Association

Illinois Council of School Attorneys

National Council of School Attorneys

*FERPA and FOIA: Compliance and Considerations, Illinois Community College
Chief Student Services Officers Winter Meeting (January 2017)*

*Residency and Homelessness: Legal Update and Considerations When
Challenging a Student's Status (October 2016)*

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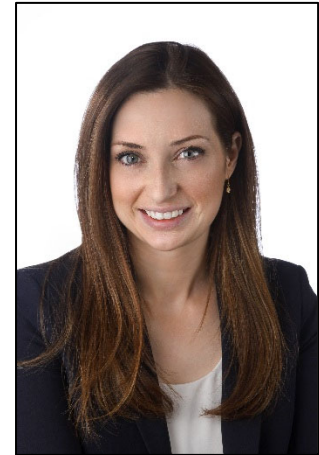
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RECENT PRESENTATIONS

Administrators Legal Update, Concordia University (December 2019)

Navigating Background Checks in Today's Environment, Illinois ASBO (May 2019)

Employee Misconduct Issues: Effective Management Strategies for Defensible Discipline/Discharge, Concordia University (April 2019)



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U.S. District Court for the Western District of Michigan

Supreme Court of Illinois

Supreme Court of Michigan

ORGANIZATIONS

American Bar Association

Illinois Bar Association

Illinois Council of School
Attorneys

Michigan Bar Association

National Council of School
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