

Proposed Education Bills

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Today &

-  Initial Matters
-  Birds-Eye View
-  What's in the bills?
-  Issues That Might Arise
-  Thoughts & Questions



Initial Matters

My background

-  Teach Arizona Education Law in College of Education
-  Direct an undergraduate clinic in College of Law
-  Former special education teacher
-  Education attorney who has represented students & parents

-  NOT an expert on legislative process

Information, Not Legal Advice

- ✎ The purpose of this presentation is to provide general information. It does **not** serve as legal advice or counsel.
- ✎ Information about: what's proposed, what legal challenges might arise, and how courts might analyze them

Warning!

- ✎ This presentation has a lot of text.
- ✎ To find Arizona statutes and bills under consideration by the legislature, visit azleg.gov





Birds-Eye View

Keep in mind:



- ✍ We don't know whether these bills will pass and, if so, what the final version will look like
- ✍ If the bills do pass and are signed into law, they will likely be challenged in court
- ✍ Ultimately, the court will decide questions of:
 - ✍ Interpretation
 - ✍ Whether any state or federal constitutional issues might invalidate the law(s)
- ✍ 2021's SB 1532/ARS 15-717.02 is an example

Guidance

 Can ask school counsel for advice & guidance



Understanding A.R.S. § 15-717.02 regarding “prohibited instruction” and its impact on teaching the History and Social Studies Standards

What is A.R.S § 15-717.02?

At the end of the 2021 session of the Arizona Legislature, a bill was passed ([Laws 2021, Chapter 404, Section 21](#)) that prohibits instruction on certain topics from being offered in public district or charter schools in grades PK-12. The law states that a teacher, administrator or other employee shall not use public monies for instruction that presents any form of blame or judgement on the basis of race, ethnicity or sex or allow instruction based on the following seven concepts:

1. One race, ethnic group, or sex is inherently morally or intellectually superior to another race, ethnic group, or sex.
2. An individual, by virtue of the individual's race, ethnicity, or sex, is inherently racist, sexist, or oppressive whether consciously or unconsciously.
3. An individual should be “invidiously” discriminated against or receive adverse treatment solely or partly because of the individual's race, ethnicity, or sex.



What's in the bills?

5 Types of Bills for Discussion
+ Proposed Amendments to AZ Constitution

Bills related to:

- 🗡️ Prohibited Instruction
- 🗡️ Required Instruction
- 🗡️ American Flag Display & Pledge of Allegiance
- 🗡️ Publicly Posting Classroom Materials
- 🗡️ Attorney General Investigation of Schools & Universities

& Proposed Amendments to the Arizona Constitution

Prohibited Instruction

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Prohibited Instruction Bills

HB 2112 and HB 2291

 K-12 prohibition on **instruction** that “presents any form of blame or judgment on the basis of race, ethnicity, or sex”

 K-12 teachers “may not **allow** or make **part of a course** any of the following **concepts**:

1. ONE RACE, ETHNIC GROUP OR SEX IS INHERENTLY MORALLY OR INTELLECTUALLY SUPERIOR TO ANOTHER RACE, ETHNIC GROUP OR SEX.
2. AN INDIVIDUAL, BY VIRTUE OF THE INDIVIDUAL'S RACE, ETHNICITY OR SEX, IS INHERENTLY RACIST, SEXIST OR OPPRESSIVE, WHETHER CONSCIOUSLY OR UNCONSCIOUSLY.
3. AN INDIVIDUAL SHOULD BE INVIDIOUSLY DISCRIMINATED AGAINST OR RECEIVE ADVERSE TREATMENT SOLELY OR PARTLY BECAUSE OF THE INDIVIDUAL'S RACE, ETHNICITY OR SEX.
4. AN INDIVIDUAL'S MORAL CHARACTER IS DETERMINED BY THE INDIVIDUAL'S RACE, ETHNICITY OR SEX.
5. AN INDIVIDUAL, BY VIRTUE OF THE INDIVIDUAL'S RACE, ETHNICITY OR SEX, BEARS RESPONSIBILITY FOR ACTIONS COMMITTED BY OTHER MEMBERS OF THE SAME RACE, ETHNIC GROUP OR SEX.
6. AN INDIVIDUAL SHOULD FEEL DISCOMFORT, GUILT, ANGUISH OR ANY OTHER FORM OF PSYCHOLOGICAL DISTRESS BECAUSE OF THE INDIVIDUAL'S RACE, ETHNICITY OR SEX.
7. ACADEMIC ACHIEVEMENT, MERITOCRACY OR TRAITS SUCH AS A HARD WORK ETHIC ARE RACIST OR SEXIST OR WERE CREATED BY MEMBERS OF A PARTICULAR RACE, ETHNIC GROUP OR SEX TO OPPRESS MEMBERS OF ANOTHER RACE, ETHNIC GROUP OR SEX.

Prohibited Concepts

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Prohibited Instruction Bills

HB 2112 and HB 2291

Consequences to include:

 Teacher suspension or revocation of teaching certificate

 Fine

 “not to exceed \$5,000 per school” – HB 2112

 “at least \$5,000 per school” – HB 2291

Prohibited Instruction Bills

Can the legislature do this?

Don't students have a right to learn about these topics?

Can the legislature tell schools what not to teach?

Prohibited Instruction Bills

✎ *Arce v. Douglas*, 793 F.3d 968 (9th Cir. 2015)



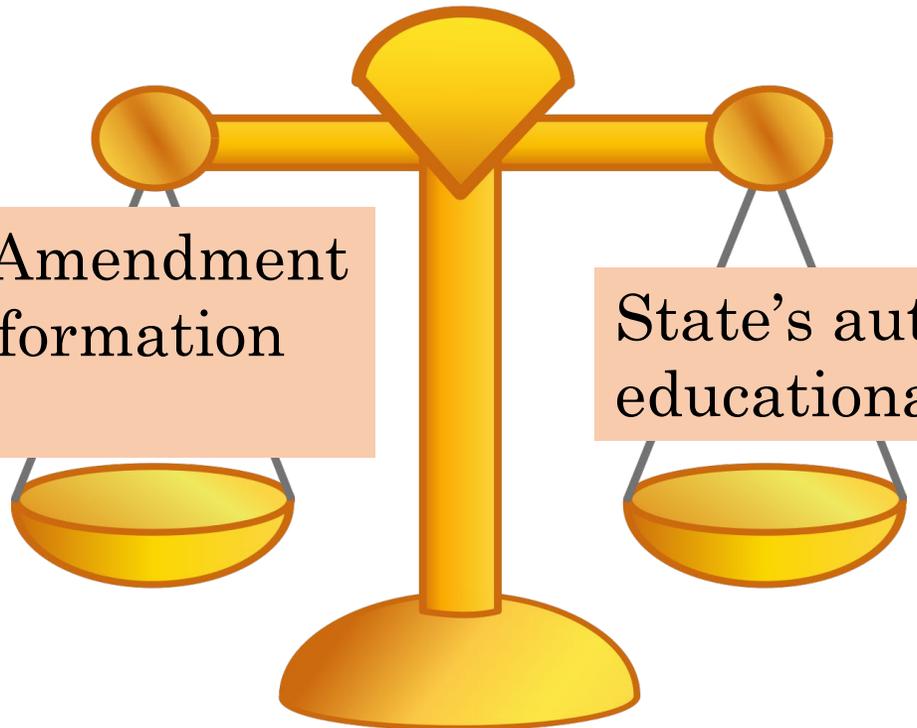
Youth action group protest TUSD governing board meeting in 2011 in protest of state law bad on "ethnic studies" (Photo from Arizona Daily Star)

Prohibited Instruction Bills

Arce v. Douglas, 793 F.3d 968, 982 (9th Cir. 2015)



“a delicate balance”



A student's First Amendment
right to receive information
and ideas

State's authority in
educational matters

Prohibited Instruction Bills

✍ *Arce v. Douglas*, 793 F.3d 968, 983 (9th Cir. 2015)

First
Amendment
Rights of
Students to
[RECEIVE INFO](#)

“[T]he state may not remove materials otherwise available in a local classroom unless its actions are *reasonably related to legitimate pedagogical concerns*”

*especially “where the local school board has already determined that the material at issue adds value to its local school curriculum”

Prohibited Instruction Bills

What type of instruction do these bills prohibit anyway?

What does it even **mean** to make a concept “part of a course”?

Are these bills *too vague*?

Prohibited Instruction Bills



Arce v. Douglas, 793 F.3d 988 (9th Cir. 2015)

“A statute is impermissibly vague if it:

fails to provide a reasonable opportunity to know what conduct is prohibited, or

is so indefinite as to allow arbitrary and discriminatory enforcement”

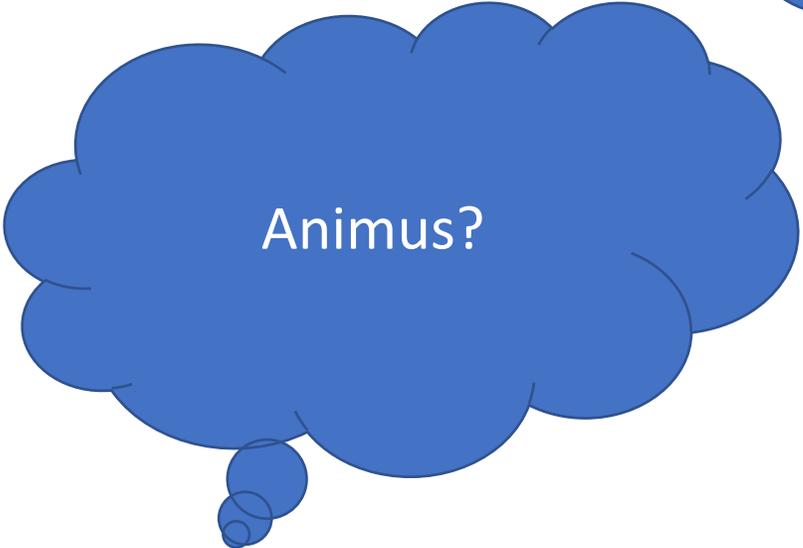
Prohibited Instruction Bills

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These bills are
really broad...

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Do these bills
prioritize one
particular
viewpoint over
another?

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Animus?

Arce v. Douglas, 793 F.3d 968 (9th Cir. 2015)
Racial Animus



A statute can be invalid if its enactment or enforcement was motivated by a discriminatory purpose, such as **racial animus**

Vill. Of Arlington Heights v. Metro. Hous. Dev. Corp.,
429 U.S. 252 (1997)

5 Factors to Determine Racial Animus:

1. Impact bears more heavily on one race than another?
2. Historical background of law
3. Specific sequence of events that led up to law
4. Departures from normal procedures or substantive conclusions
5. Relevant legislative history

Prohibited Instruction Bills



To the extent these bills seem concerned with discrimination

→ don't we already prohibit discrimination based on race and sex?

“Hostile Environment” already prohibited

Title VI of the Civil Rights Act of 1964, 42 U.S.C. §2000d *et seq.*

 Requires schools to address any hostile environment in schools due to discrimination based on race, color, or national origin. See *Monteiro v. Tempe Union High Sch. Dist.*, 158 F.3d 1022, 1025 (9th Cir. 1998).

Title IX of the Educational Amendments of 1972, 20 U.S.C. §1681 *et seq.*

 Requires schools to address sexual harassment and any hostile environment due to discrimination based on sex. See *Davis v. Monroe County Board of Education*, 526 U.S. 629, 651 (1999)



Required Instruction

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Required Instruction

HB 2555 – Civics

 Adds details to current law regarding required civics education K-12

4 15-701.01. High schools; graduation; requirements; community
5 college or university courses; transfer from
6 other schools; academic credit
7 A. The state board of education shall:
8 1. Prescribe a minimum course of study that incorporates the
9 academic standards adopted by the state board for the graduation of pupils
10 from high school.
11 2. Prescribe competency requirements for the graduation of pupils
12 from high school incorporating the academic standards in at least the
13 areas of reading, writing, mathematics, science and social studies. The
14 academic standards prescribed by the state board in social studies shall
15 include personal finance, ~~and~~ American civics education AND A COMPARATIVE
16 DISCUSSION OF POLITICAL IDEOLOGIES, SUCH AS COMMUNISM AND TOTALITARIANISM,
17 THAT CONFLICT WITH THE PRINCIPLES OF FREEDOM AND DEMOCRACY THAT ARE
18 ESSENTIAL TO THE FOUNDING PRINCIPLES OF THE UNITED STATES. The state

HB 2555 – Civics

 Federalist papers

 Sense of civic pride

 Understanding of civic-minded expectations

 Oral histories of diverse, civic-minded individuals

1 (ii) THE HISTORY, MEANING, SIGNIFICANCE AND EFFECT OF THE
2 PROVISIONS OF THE UNITED STATES CONSTITUTION AND AMENDMENTS TO THE UNITED
3 STATES CONSTITUTION, WITH EMPHASIS ON EACH OF THE TEN AMENDMENTS THAT MAKE
4 UP THE BILL OF RIGHTS AND HOW THE UNITED STATES CONSTITUTION PROVIDES THE
5 STRUCTURE OF OUR GOVERNMENT.

6 (iii) THE ARGUMENTS IN SUPPORT OF ADOPTING OUR NATION'S REPUBLICAN
7 FORM OF GOVERNMENT AS EMBODIED IN THE MOST IMPORTANT OF THE FEDERALIST
8 PAPERS.

9 (b) A SENSE OF CIVIC PRIDE AND A DESIRE TO PARTICIPATE REGULARLY IN
10 GOVERNMENT AT THE LOCAL, STATE AND FEDERAL LEVELS.

11 (c) AN UNDERSTANDING OF THE PROCESS FOR EFFECTIVELY ADVOCATING
12 BEFORE GOVERNMENT BODIES AND OFFICIALS.

13 (d) AN UNDERSTANDING OF THE CIVIC-MINDED EXPECTATIONS, DEVELOPED BY
14 THE STATE BOARD OF EDUCATION, OF AN UPRIGHT AND DESIRABLE CITIZENRY THAT
15 RECOGNIZES AND ACCEPTS RESPONSIBILITY FOR PRESERVING AND DEFENDING THE
16 BLESSINGS OF LIBERTY INHERITED FROM PRIOR GENERATIONS AND SECURED BY THE
17 UNITED STATES CONSTITUTION.

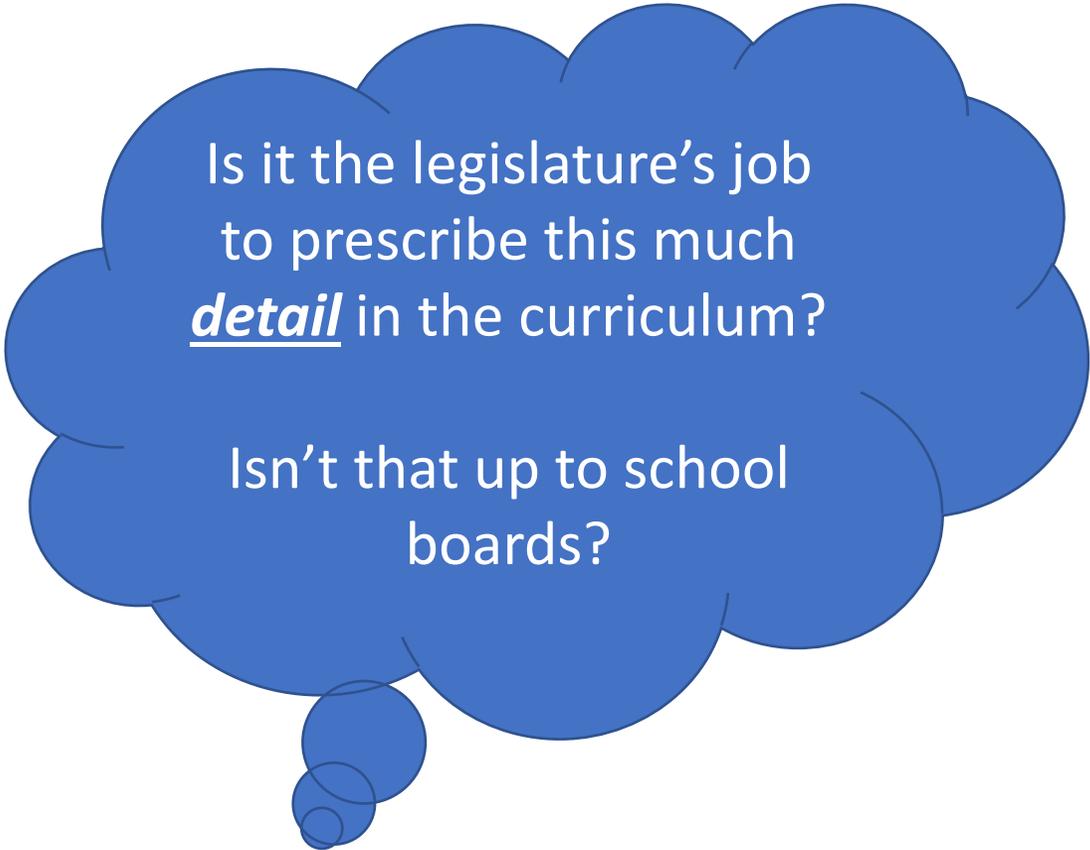
18 2. CURATE ORAL HISTORY RESOURCES TO BE USED ALONG WITH THE CIVIC
19 EDUCATION STANDARDS THAT PROVIDE PORTRAITS IN PATRIOTISM BASED ON THE
20 PERSONAL STORIES OF DIVERSE INDIVIDUALS WHO DEMONSTRATE CIVIC-MINDED
21 QUALITIES, INCLUDING FIRST-PERSON ACCOUNTS OF VICTIMS OF OTHER NATIONS'
22 GOVERNING PHILOSOPHIES WHO CAN COMPARE THOSE PHILOSOPHIES WITH THOSE OF
23 THE UNITED STATES.

24 3. REVIEW AND EITHER APPROVE OR REJECT THE INTEGRATED CIVIC
25 EDUCATION CURRICULUM SUBMITTED BY EACH SCHOOL DISTRICT AND CHARTER SCHOOL
26 PURSUANT TO SUBSECTION B OF THIS SECTION TO ENSURE THAT THE CURRICULUM
27 MEETS THE REQUIREMENTS OF THIS SECTION.

28 B. ON OR BEFORE A DATE PRESCRIBED BY THE STATE BOARD OF EDUCATION,
29 EACH SCHOOL DISTRICT AND CHARTER SCHOOL SHALL ANNUALLY SUBMIT ITS
30 INTEGRATED CIVIC EDUCATION CURRICULUM TO THE STATE BOARD OF EDUCATION FOR
31 APPROVAL .

Required Instruction

HB 2555 – Civics



Is it the legislature's job
to prescribe this much
detail in the curriculum?

Isn't that up to school
boards?

Required Instruction

HB 2555 – Civics

 Article 11, section 2 of Arizona State Constitution:

2. Conduct and supervision of school system

Section 2. The general conduct and supervision of the public school system shall be vested in a state board of education, a state superintendent of public instruction, county school superintendents, and such governing boards for the state institutions as may be provided by law.



Flag and Pledge

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Flag & Pledge of Allegiance

HB 2597, Amending A.R.S. 15-506 to require:

 daily pledge of allegiance to the flag (K-6)

 daily minute of quiet reflection and moral reasoning (4-12)

 Parent exemption

17 authorities direct.

18 4. For grades seven through twelve, place a legible copy of the
19 Constitution of the United States and the Bill of Rights adjacent to each
20 classroom flag.

21 5. FOR KINDERGARTEN PROGRAMS AND GRADES ONE THROUGH SIX, set aside
22 a specific time each day for ~~those~~ students ~~who wish~~ to recite the pledge
23 of allegiance to the United States flag. STUDENTS SHALL RECITE THE PLEDGE
24 OF ALLEGIANCE TO THE UNITED STATES FLAG DURING THIS TIME. AT THE REQUEST
25 OF A PARENT, THE PARENT'S STUDENT SHALL BE EXCUSED FROM THE REQUIREMENT OF
26 THIS PARAGRAPH.

27 6. FOR GRADES FOUR THROUGH TWELVE, SET ASIDE A SPECIFIC TIME EACH
28 DAY FOR STUDENTS TO ENGAGE IN QUIET REFLECTION AND MORAL REASONING FOR AT
29 LEAST ONE MINUTE. STUDENTS SHALL ENGAGE IN QUIET REFLECTION AND MORAL
30 REASONING DURING THIS TIME. AT THE REQUEST OF A PARENT, THE PARENT'S
31 STUDENT SHALL BE EXCUSED FROM THE REQUIREMENT OF THIS PARAGRAPH.

32 B. Private schools, parochial schools and homeschools are exempt
33 from this section.

Flag & Pledge of Allegiance

HB 2597

 Implicates students' First Amendment rights

 Pledge of Allegiance cannot be required

 Mandatory prayer in school not allowed

This bill seems to follow a case out of Florida, which held that requiring parental permission before being excused from reciting the pledge did not violate students' First Amendment rights

Frazier ex rel. Frazier v. Winn, 535 F.3d 1279, 1282 (11th Cir. 2008)



Publicly Posting Materials

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Publicly Posting Classroom Materials

HB 2315 & 2535, creating ARS 15-113.01

 Current law (ARS 15-113):

A. A parent of a student in a public educational institution has the right to review learning materials and activities in advance. A parent who objects to any learning material or activity on the basis that the material or activity is harmful may request to withdraw that parent's student from the activity or from the class or program in which the material is used and request an alternative assignment.

Publicly Posting Classroom Materials

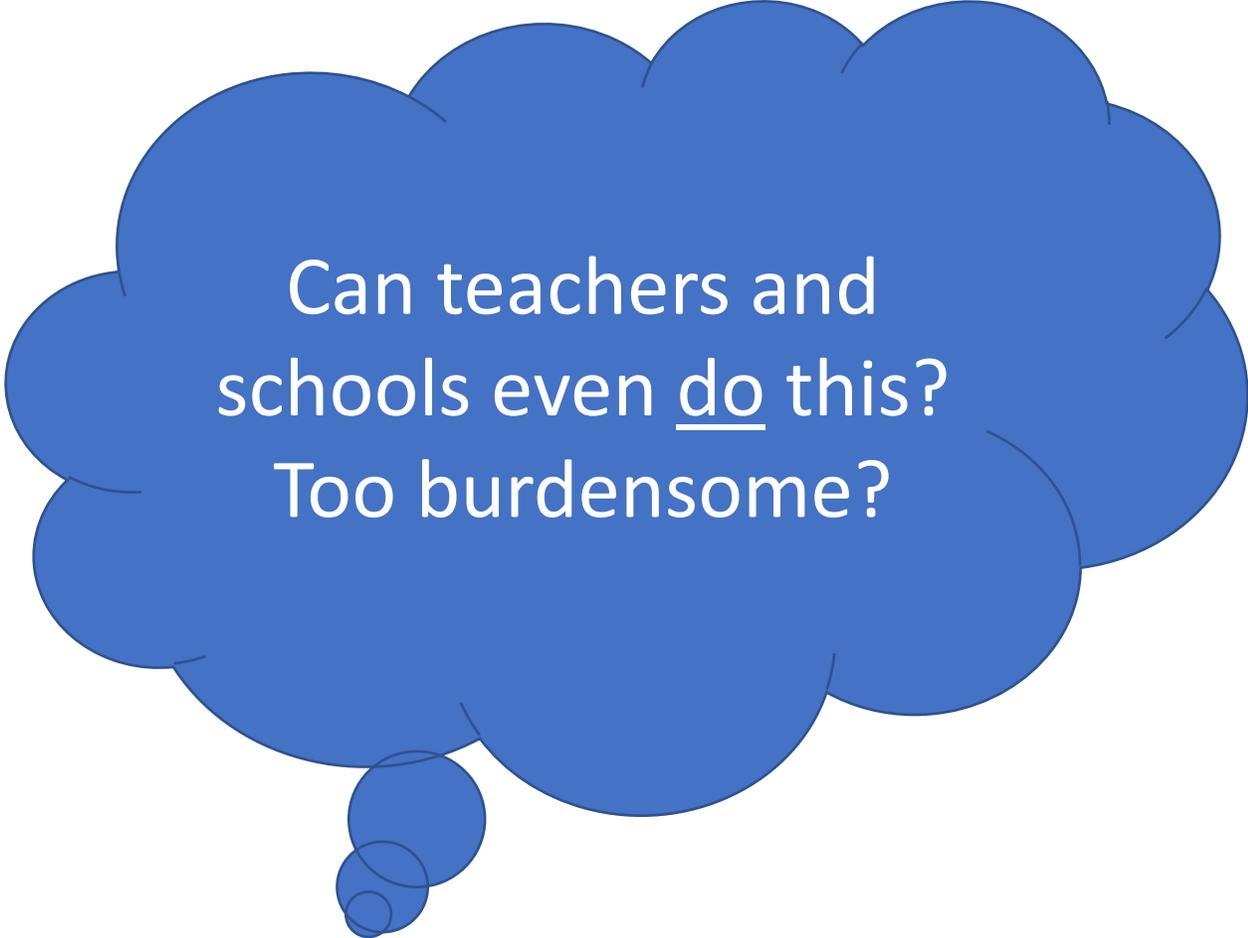
HB 2315 would require public schools to post on a website:

- Lists of required or recommended classroom reading materials (title, author, publisher, etc.)
- Lists of assigned or recommended audio, video, or audiovisual presentations (title, author, publisher, etc.)
- Regular updates

HB 2535 would also require similar websites

- For “all of the learning materials and activities” that are used or “being considered for use”
- Available 3 or fewer clicks
- 60-day waiting period before purchasing, approving, or selecting any of the materials

Publicly Posting Classroom Materials



Can teachers and
schools even do this?
Too burdensome?

Publicly Posting Classroom Materials



 Article 11, Section 2 of Arizona State Constitution:

2. Conduct and supervision of school system

Section 2. The general conduct and supervision of the public school system shall be vested in a state board of education, a state superintendent of public instruction, county school superintendents, and such governing boards for the state institutions as may be provided by law.

Arce v. Douglas, 793 F.3d 968 (9th Cir. 2015)

✎ Ban on TUSD Mexican-American Studies Implicates students' First Amendment right to receive information and ideas

✎ Cited a 1982 Supreme Court Case holding that “a school could not remove certain materials from its library because of a disagreement with the ideas in the book or to impose upon the students a ‘political orthodoxy.’”

Bd. of Educ., Island Trees Union Free Sch. Dist. No. 26 v. Pico, 457 U.S. 853, 866–67 (1982) (plurality opinion).





Investigations

Last proposed bill

Investigation of Schools & Universities

HB 2276

- ✎ Current state law (ARS 41-194.01) requires the state attorney general to investigate allegations that a **county, city, or town's ordinance, regulation, order, or other official action** violated state law or the AZ Constitution, upon the request of a member of the legislature request
- ✎ HB 2276 would amend this state law to include investigations for regulations, orders, and other official actions taken by **universities, ABOR, and public schools**

Investigations of Schools



 Article 11, Section 2 of Arizona State Constitution:

2. Conduct and supervision of school system

Section 2. The general conduct and supervision of the public school system shall be vested in a state board of education, a state superintendent of public instruction, county school superintendents, and such governing boards for the state institutions as may be provided by law.

Investigation of Schools & Universities

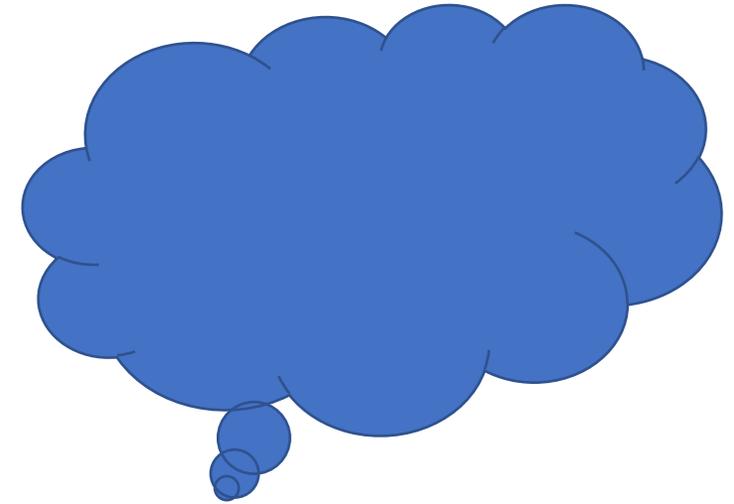
HB 2276

 ARS 15-1626(A): ABOR has “the powers necessary for the effective governance and administration of the institutions under its control”

 Including the power to “establish curricula and designate courses at the several institutions that in its judgment will best serve the interests of this state”

Bills related to:

- 🚫 Prohibited Instruction
- 🚫 Required Instruction
- 🚫 American Flag Display & Pledge of Allegiance
- 🚫 Publicly Posting Classroom Materials
- 🚫 Attorney General Investigation of Schools & Universities



Proposed Amendments to AZ Constitution

HCR 2001



✎ What's a *concurrent resolution*?

✎ HCR 2001, if it passes both houses of the legislature, would propose amendments to the AZ Constitution, if approved by the voters and on proclamation of the governor

✎ These amendments could still face legal challenges if they conflict with the U.S. Constitution

HCR 2001

“Stop Critical Race Theory and Racial Discrimination in Schools and Other Public Institutions Act”



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1. Short title

This act may be cited as the "Stop Critical Race Theory and Racial Discrimination in Schools and Other Public Institutions Act".

2. Purpose

The people of this state find and declare the following:

1. Slavery, legal racial discrimination and racism are so inconsistent with the founding principles of the United States that Americans fought a civil war to eliminate the first, waged long-standing political campaigns to eradicate the second and have made the third unacceptable in the court of public opinion.

2. Racially discriminatory ideologies and practices such as that known as "critical race theory" directly contradict the principles of the Fourteenth Amendment of the United States Constitution, the Civil Rights Act of 1964 and the Constitution of Arizona by inflaming divisions on the basis of race and ethnicity.

3. By advocating for differential treatment of individuals on the basis of race and ethnicity, promoting the assumption that reverse racism is necessary or advancing the idea that an individual should be first and foremost reduced to one's demographic identity, the aforementioned ideologies and practices deny the constitutional guarantee of equal protection of the law and the promise of the Declaration of Independence holding that all men are created equal.

4. The ordinary meaning of terms such as "anti-racist" and "diversity, equity and inclusion" have been supplanted and distorted by proponents of an ideology that actively groups, segregates, discriminates or otherwise advocates for differential treatment among individuals based on racial and ethnic characteristics.

5. It is unacceptable for state-run, taxpayer-supported institutions to teach or implement racially discriminatory ideologies or practices or to require students or employees to endorse racial discrimination or participate in activities promoting it



Proposed Article II, section 36

Currently:

- “Affirmative Action Ban” (Prop 107)
- Prohibits preferential treatment or discrimination on the basis of “race, sex, color, ethnicity, or national origin” in operation of public schools, including universities

HCR 2001 would, among other things:

- Prohibit treating applicants differently on the basis of race or ethnicity when making hiring, promotion, or admissions decisions
- Prohibit disciplinary decisions that treat students differently on the basis of race or ethnicity



Proposed Article XI, section 7

Currently:

- Prohibits “religious or political test[s]” as a condition for admission to public school as a teacher or student

HCR 2001 would, among other things:

- Include *employees*, as well as teachers
- Include *promotion*, as well as admission
- Defines “*political test*” as “compelling or soliciting” a **statement** of personal belief in support of any ideology or movement that promotes differential treatment...based on race”



Proposed Article XI, section 12

Currently:

- Does not exist

HCR 2001 would, among other things:

- Prohibit schools & universities from compelling any employee or student to *endorse or profess, or attend trainings promoting*, the concepts mentioned in HR 2112 & 2291

Prohibited Concepts

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Discussion

