

STATE OF CONNECTICUT SUPREME COURT

S.C. 18032

**CONNECTICUT COALITION FOR JUSTICE IN
EDUCATION FUNDING, ET AL.**

V.

GOVERNOR M. JODI RELL, ET AL.

BRIEF OF THE AMICI CURIAE

In Support of Plaintiff-Appellants

**Connecticut State Conference NAACP
Center for Children's Advocacy, Inc.**

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INTERESTS OF THE AMICI CURIAE

The Connecticut State Conference NAACP and the Center for Children's Advocacy, Inc. (collectively, the "Amici"), submit this brief to assist the Connecticut Supreme Court as it determines the scope of the fundamental right to education provided by Article Eighth, § 1 and Article First, §§ 1 and 20, of the Connecticut constitution. Ensuring that Connecticut's schoolchildren receive suitable and equitable educational opportunities, regardless of ethnicity or economic position, is central to the missions of the Amici and is of critical importance to their members. Accordingly, the Amici request that the Connecticut Supreme Court reverse the trial court's decision and remand this matter, allowing the case to proceed to discovery so that the judiciary may properly evaluate the constitutional sufficiency of K-12 education in the state.

1. Connecticut State Conference NAACP

The National Association for the Advancement of Colored People ("NAACP"), established in 1909, is the nation's oldest and largest civil rights organization. The NAACP has affiliates and members nationwide, including Connecticut, and in other parts of the world. The fundamental mission of the NAACP is the advancement and improvement of the political, educational, social and economic status of minority groups; the elimination of racial prejudice; the publicizing of adverse effects of discrimination; and the initiation of lawful action to secure the elimination of racial and ethnic bias.

The NAACP has a significant interest in the outcome of this case. The organization is deeply concerned with ensuring excellence as well as equity in public education. Educational opportunity for African Americans and other children of color has been a fundamental goal of the NAACP since its founding.

The NAACP has been active in monitoring and litigating issues concerning educational equality in Connecticut's public education system. The Connecticut State Conference NAACP currently is a Defendant-Intervenor in State of Connecticut v. Spellings, Civ. No. 3:05-CV-01330 (MRK), 2007 U.S. Dist. LEXIS 7638 (D. Conn. Nov. 11, 2006) (order granting intervention), which was initiated by the State against the U.S. Secretary of Education, to protect the interests of minority and low-income children in Connecticut's compliance with Title 1 of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the No Child Left Behind Act of 2001 (NCLB).

2. Center for Children's Advocacy, Inc.

The Center for Children's Advocacy, Inc. (the "Center") is a non-profit organization dedicated to the enhancement of the legal rights of poor children. The Center's explicit mission is to address the needs of children who fall through the cracks of the child welfare, education, juvenile justice and mental health systems. The Center was class counsel for all children in the state's juvenile detention centers, Emily J. v. Weicker, 3:93-CV-1944 (D. Conn. 1997); abused and neglected children under the care and custody of the Department of Children and Families, Juan F. v. Rowland, Civ. No. H. 89-673 (D. Conn. 1991), and is one of the plaintiffs' counsel in Sheff v. O'Neill, 238 Conn. 1 (1996). The Executive Director of the Center has also participated in numerous other cases before this Court involving the rights of families and children, including In re Valerie D., 223 Conn. 492 (1992), In re David W., 254 Conn. 676 (2000), and In re Juvenile Appeal (830CD), 189 Conn. 276 (1983).

The Center has provided legal representation on education issues to hundreds of children through its Teen Legal Advocacy Clinic at Hartford Public High School and

Bridgeport's Harding High School and its Child Abuse Project. The Center also operates a TeamChild program, which provides special education advocacy to youth in Hartford who are in the juvenile justice system. See www.kidscounsel.org. The Center participates in legislative advocacy, working with state, federal, and local officials on questions of truancy, alternatives to incarceration, and children's access to mental health care.

Safeguarding the rights of children represented in this case, therefore, is not only a matter of deep interest to the Center, but lies directly within the Center's expertise. The questions this Court will decide are at the core of the Center's mission.

I. Introduction

This case represents a tale of two Connecticut¹. In one Connecticut, children go to preschool, attend elementary and secondary school in new buildings with new books, have the choice of a panoply of advanced courses to prepare for college, and receive the best supplemental education money can buy when they need extra help. Then there is the other Connecticut—primarily urban, low-income, and racial minority. The children in this Connecticut are less likely to go to preschool, more likely to attend class in older buildings in dangerous neighborhoods, are lucky to have enough textbooks and classroom supplies, let alone new ones, and have few avenues to receive proper preparation for college. These children are also more likely to drop out of high school and continue the cycle of poverty into which they were born.²

The students in the second Connecticut described above undeniably receive a lower quality education than do their peers in wealthier school districts. Amici argue that not only is this inequitable education a violation of Article Eighth, § 1 of the Connecticut constitution, but that providing an unsuitable education that does not prepare children to be productive citizens also violates the state constitution. Because the trial court prematurely, and inappropriately, made a final determination on the meaning of Article Eighth, § 1 on a motion

¹ A 1988 report submitted to the Connecticut State Board of Education by the Committee on Racial Equity, appointed by the Commissioner of Education, explained how Connecticut schools were segregated along the lines of urban poverty and suburban wealth, race and ethnicity, and student achievement. The report called this division "educationally, morally and legally wrong." COMMITTEE ON RACIAL EQUITY, A REPORT ON RACIAL/ETHNIC EQUITY AND DESEGREGATION IN CONNECTICUT'S PUBLIC SCHOOLS 1 (1988).

² For a more in depth description of the difference in educational opportunities for children in Connecticut, particularly the sub-standard education given to students in Hartford, see SUSAN EATON, THE CHILDREN IN ROOM E4 128-133 (2007). For an example of the differences in opportunity between a typical suburban and a typical urban school district, see id. at 266-285.

to strike, however, the judiciary has not had an opportunity to examine a full record of evidence that would amply demonstrate the shortcomings of the education received by schoolchildren, whom by accident of birth are not wealthy or white. In this brief, the Amici preview for this Court evidence that supports the Plaintiffs' argument that poor and minority children are receiving an unsuitable and inequitable education. Amici urge this Court to reverse the trial court's decision and remand the case to allow it to proceed.

II. Procedural History

The Plaintiffs, the Connecticut Coalition for Justice in Education Funding, filed this action on behalf of all children from ages 3 to 18 who are not receiving suitable and substantial educational opportunities, a fundamental right under the Connecticut constitution. The Defendants, Governor M. Jodi Rell, et al., filed a motion to strike three of the Plaintiffs' four counts on the grounds that the Connecticut constitution does not establish a right to "suitable educational opportunities as defined by the Plaintiffs and that the issues raised by the Plaintiffs are not justiciable." Mem. of Decision on Mot. to Strike, Sept. 17, 2007 ("Mem."), at 1-2. Although the factual record had not yet been developed, the trial court examined the six factors set out by this Court in State v. Geisler, 222 Conn. 672, 685 (1992), to consider an unsettled question of state constitutional law. The trial court granted the motion to strike based on its determination that the Plaintiffs' complaint did not state a claim upon which relief could be granted. The Plaintiffs appealed the decision.³

³ In the interests of judicial economy, Amici refer the Court to the Plaintiffs' brief for a more detailed summary of the procedural history of this case.

III. Argument

- A. The trial court's premature decision to strike the Plaintiffs' claims without allowing for full factual development was improper under Connecticut law, particularly in light of the trial court's use of the Geisler factors.

The trial court's analysis of the six factors outlined by State v. Geisler (the "Geisler factors") in granting the Defendants' motion to strike was premature.⁴ Connecticut courts consistently have declined to resolve questions of constitutional law that are presented on motions to strike declaratory judgment actions, in part because the Geisler factors require extensive analysis.⁵ The Geisler factors require the court to consider the following in determining unsettled questions of state constitutional law:

⁴ A motion to strike is granted only when the existence of the facts provable in the complaint would not support a cause of action as a matter of law. The purpose of a motion to strike traditionally has been to challenge the legal sufficiency of pleadings. Conn. Prac. Book § 10-39(a)(1). In reviewing a motion to strike, the trial court is required to:

examine the [complaint], construed in favor of the [plaintiff], to determine whether the [pleading party has] stated a legally sufficient cause of action. . . . [I]f facts provable in the complaint would support a cause of action, the motion to strike must be denied. . . . [P]leadings must be construed broadly and realistically, rather than narrowly and technically.

Daniels v. City of New Haven, 2007 WL 1414072, *1 (Conn. Super. Ct. Apr. 18, 2007) (internal citations and quotation marks omitted). A party seeking a motion to strike on an undecided claim must demonstrate that the plaintiff cannot, as a matter of law, prevail on its claim.

⁵ See, e.g., Broadnax v. City of New Haven, 2000 WL 35533254 (Conn. Super. Ct. May 16, 2000); Broadley v. Board of Education, 1990 WL 269168, *1 (Conn. Super. Ct. July 20, 1990); Sheff v. O'Neill, 1990 WL 284341, *5 (Conn. Super. Ct. June 18, 1990). While this Court recently has decided an ultimate issue of constitutional law on an appeal from a motion to strike in an action seeking declaratory and injunctive relief, the facts of the present case are distinguishable from those in Batte-Holmgren v. Comm'r of Pub. Health, 281 Conn. 277 (2007). In Batte-Holmgren, the plaintiffs challenged the state's smoking ban solely under an equal protection claim, and did not provide this Court with a separate analysis of claims under state constitutional law. See id. 295 n.9. Therefore, this Court was not required to complete a Geisler analysis. Additionally, the equal protection claims in Batte-Holmgren required only rational basis review because no suspect class or fundamental right was involved. The Plaintiffs' challenge implicates both a fundamental right and suspect class, and therefore is entitled to strict scrutiny review.

"(1) the textual approach; . . . (2) holdings and dicta of this court, and the Appellate Court; . . . (3) federal precedent; . . . (4) sister state decisions or sibling approach; . . . (5) the historical approach, including the historical constitutional setting and the debates of the framers; . . . (6) economic/ sociological considerations.

Id. As this brief demonstrates, an examination of whether the Plaintiffs are receiving suitable and substantially equal educational opportunities as provided for by Article Eighth, § 1, requires an analysis of a factual record, including expert testimony and socioeconomic data, which was not available to the trial court at such a preliminary stage of the proceedings.

While the complaint does outline the facts and evidence of the disparate educational opportunities within Connecticut's school systems and the impact of that disparity on its students, those factual allegations are no substitute for the fully developed evidentiary record necessary for the trial court to conduct a full Geisler analysis. Thus, the trial court, by prematurely striking the Plaintiffs' claims, improperly resolved an unsettled question of law without availing itself of the opportunity to review the evidence that would demonstrate the necessity of including the right to suitable educational opportunities within the fundamental right to education provided by the Connecticut constitution. Therefore, the trial court's decision must be overturned and this case must be remanded for further evidentiary development.

B. Existing socioeconomic data demonstrates that restricting the fundamental right to education in Connecticut to exclude a right to suitable educational opportunities will have a disproportionate effect on poor and minority communities in violation of their fundamental rights.

The trial court improperly failed to admit the facts alleged in the Plaintiffs' complaint in determining that Connecticut's fundamental right to education does not encompass a right to suitable educational opportunities. The sixth Geisler factor requires the trial court to examine the existing socioeconomic data. That data, alleged in the Plaintiffs' complaint

and outlined in this brief in more detail, reveals the unequal educational opportunities currently faced by Connecticut's poor and minority youth and the impact of that disparity on the students' fundamental right to an equal education.

This gap in educational opportunities is obvious between poor and non-poor⁶ students. For instance, while only 13 percent of poor fourth graders meet the State's proficiency standards in reading, 53 percent of non-poor children meet the State's goals. CONNECTICUT GENERAL ASSEMBLY COMMISSION ON CHILDREN, CHILD POVERTY IN CONNECTICUT (2007), http://www.cga.ct.gov/coc/PDFs/poverty/poverty_factsheet_100607.pdf. The gap only increases as children progress in school. In middle school, the annual increases in students meeting Connecticut Mastery Test ("CMT") goals for non-poor students are more than double the gains made by poor students. See CONNCAN, THE STATE OF CONNECTICUT PUBLIC EDUCATION 8 (2007), http://www.conncan.org/matriarch/documents/ConnCAN_State_Of_CT_Public_Ed_2007.pdf. The gap between poor and non-poor students in Connecticut is the largest in the country when looking at scores from the U.S. Department of Education's National Assessment of Educational Progress test ("NAEP"). Id. Connecticut's poor students consistently rank below poor students from other parts of the country on NAEP testing. See id. (stating that poor students in Alabama outperform poor students in Connecticut).

There is also a conspicuous disparity in suitable educational opportunities between minority and non-minority students in Connecticut schools. White students make annual

⁶ In the education context, "non-poor" students are generally defined as children from families with incomes over 185 percent of the federal poverty level. Children from families with incomes below that level qualify for free and reduced-price lunch subsidies, and are typically described as "poor" or low-income.

CMT gains more than double those of black students and three-and-a-half times more than those made by Hispanic students. See id. This increase in the achievement gap is significant; if these students were receiving the same educational opportunities throughout their school years, one would expect the early achievement gap to remain steady, rather than increase.

The racial achievement gap is more dramatic when Connecticut's NAEP scores are examined. The test results indicate that the majority of poor and minority fourth graders are in the "below basic reading" achievement group.⁷ Black and Hispanic students remain well behind their white peers in reading achievement, with scores averaging 35 points lower in the fourth grade and 30 to 33 points lower in the eighth grade. In Connecticut, less than one-fifth of black and Hispanic fourth graders would be considered proficient under the Department of Education guidelines. This number improves somewhat for eighth graders, but nearly half of students eligible for the federal school lunch program and Hispanic students remain below basic reading achievement in eighth grade. In contrast, nearly

⁷ Minorities in Connecticut are disproportionately more likely to be poor than their overall population numbers in the state; this is especially true of Hispanics. See DIANA M. PEARCE, OVERLOOKED AND UNDERCOUNTED: WHERE CONNECTICUT STANDS 8 (Conn. General Assembly Permanent Comm'n on the Status of Women 2007), <http://www.cga.ct.gov/PCSW/Publication%20PDFs/2007/WCS%20Full%20Report.pdf>. Moreover, Hispanic and African-American children are seven times more likely to experience poverty than white children. See CONNECTICUT GENERAL ASSEMBLY COMMISSION ON CHILDREN. Poor minorities are concentrated in the urban areas of the state, such as Bridgeport, Hartford, New Haven, Stamford, and Waterbury, which account for one-third of poor households in Connecticut although they contain only 17 percent of the state's total population. See id. at 5. These areas also lead the state in unemployment rates; JOACHIM HERO ET AL., THE STATE OF WORKING CONNECTICUT IV-2 (Conn. Voices for Children 2007), <http://www.ctkidslink.org/publications/SOWCT2007fullreport.pdf>; and often have a lower property tax base in order to raise funds for their school systems. See JUDITH CAROLL, CONNECTING THE DOTS: GROWTH, WORK, AND PROSPERITY 27 (Conn. Ass'n for Human Servs., Inc. 2007), <http://www.caahs.org/documents/2007KCReportConnectingtheDots.pdf>.

70 percent of white fourth graders are proficient or advanced readers, and over half of white eighth graders are at these levels.⁸

Despite the severity of this achievement gap, poor and minority students do not receive the educational inputs required for them to catch-up to their more affluent and non-minority peers and obtain the level of education necessary to become productive members of society. This lower achievement of students in poor and minority-dominated districts is caused by the lack of highly qualified teachers, inadequate classroom supplies, and substandard school facilities, among other deficiencies. Evidence shows that when students from low-performing, poorly funded schools are placed in high-achieving suburban schools rich in resources through programs such as Project Choice,⁹ they generally perform on state standardized tests at rates above average for their home districts and above average for black and Hispanic students across the country. See ERICA FRANKENBERG, IMPROVING AND EXPANDING HARTFORD'S PROJECT CHOICE PROGRAM 2 (Project Choice Campaign 2007), <http://www.hfpg.org/matriarch/documents/ProjectChoiceCampaignExecutiveSummary.pdf>.

Due to the trial court's premature truncation of this case, the extent of this problem has yet to be put before the court through the development of an evidentiary record. The existing data clearly show, however, that elementary and middle school minority and poor students in Connecticut do not receive the same level of educational opportunities as their white and non-poor counterparts. This disparity negatively impacts minority and poor

⁸ Professor Reginald S. Lee, M.A., a senior research associate at the University of South Florida, collected and analyzed the NAEP data used in this brief from "The Nation's Report Card," which is the U.S. Department of Education's report of NAEP scores and statistics. The Report Card can be found at <http://nces.ed.gov/nationsreportcard/states>.

⁹ Project Choice is a state-funded program that allows children from the poorest urban areas in Connecticut to attend public schools in wealthier suburban school districts.

students' academic success and future educational opportunities. Because this disparity, which is unique to minorities and the poor, is directly tied to the education provided by the State, the State is violating the fundamental rights provided to these children under the Connecticut constitution. The trial court's grant of the Defendants' motion to strike improperly prevented the Plaintiffs from obtaining full judicial review of the State's violation of this constitutional right.

- C. The future life chances of students in economically disadvantaged and minority communities are highly correlated to the quality of educational opportunities they receive; recognizing a right to quality education will empower minority communities and improve the economic potential of Connecticut as a whole.**

Existing data that also was not reviewed by the trial court indicates that disparate educational opportunities impact the lives of Connecticut's minority and poor students well beyond their days in elementary and middle school classrooms. The data shows that students' high school and college careers, as well as their ability to obtain employment and earn a living wage, are strongly tied to the educational opportunities they receive in their formative years. For example, students attending school systems more likely to provide unsuitable educational opportunities are more likely to drop out—the wealthiest districts in Connecticut have a drop out rate under one percent, while the poorest districts have a drop out rate of over 20 percent. See CAROLL at 28. Employment prospects for those who drop out and do not later obtain a diploma or GED are grim—they suffer from higher unemployment rates and are more likely to be poor, on public assistance, or involved in the criminal justice system than their peers who graduate from high school. See id.

High school dropouts are six times more likely to experience unemployment than persons with at least a bachelor's degree, and the unemployment rate for those without

high school diplomas has been rising over the last 25 years, while the rates for better-educated populations remain steady. HERO at IV-2. Predictably, the least educated in Connecticut's workforce also earn less money.¹⁰ In the Hartford area alone, about 41 percent of adults read and comprehend below the literacy level required for them to earn a living wage. See CONNECTICUT GENERAL ASSEMBLY COMMISSION ON CHILDREN. Teaching students how to communicate through reading and writing is one of the most basic and most essential functions of public education. The existence of such a large population of citizens who are unable to read indicates that Connecticut has failed to provide every student with suitable and substantially equal educational opportunities.

Current data suggests that this Court's recognition of a right to suitable educational opportunities within Connecticut's fundamental right to a substantially equal education, could greatly improve students' potential academic and economic success, regardless of race and class. For instance, access to quality pre-school programs has a positive correlation with later academic and economic success. See CAROLL at 24. Unfortunately, the children who need this kind of good start the most—poor children—are less likely to receive it than their wealthier peers. See id. at 25. Presumably, the right to a suitable education would make it more likely that poorer children would have access to early childhood education, setting them on the path to higher academic achievement and combating the achievement gap much sooner than what presently occurs.

This preliminary data demonstrates the necessity of incorporating a right to suitable educational opportunities into the state constitutional right to a substantially equal

¹⁰ Over the last several decades, real hourly wages for the least educated in Connecticut's workforce have fallen \$2.50, while the average hourly wage for the best educated has increased. HERO at V-20.

education. If the Plaintiffs' case had been allowed to continue, the Plaintiffs would have had the opportunity to present evidence that further fleshed out the impact of unequal educational opportunities on the Plaintiffs' future education and employment. The information presented above is representative of the data that the Plaintiffs would present at trial to satisfy their burden of proof. Based on this data, it is clear that without a qualitative measure included within the fundamental right to education, Connecticut's minority and poor students will continue to lack the suitable educational opportunities provided to their non-minority and non-poor peers.

IV. Conclusion

As illustrated by the facts above, too many minority and poor schoolchildren in the nation's wealthiest state are receiving far less by way of educational opportunities than they are entitled to under the Connecticut constitution. The information presented in this brief is a small collection of the data available showing that the quality of education provided to Connecticut's poor and minority students pales in comparison to that received by their wealthier, white peers. In light of the fundamental importance of the right to a substantially equal education, this Court should reverse the trial court's decision and permit the Plaintiffs to fully present their case, which will provide the trial court with the evidence necessary to perform a full Geisler analysis of the Plaintiffs' claims, including an analysis of the relevant economic and sociological considerations.

Therefore, the Amici respectfully urge this Court to reverse the trial court's decision.

Respectfully submitted,

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