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Hon. Sean Duffy, Secretary
U.S. Department of Transportation
Docket Operations, M-30
West Building Ground Floor, Room W12-140
1200 New Jersey Avenue, S.E.
Washington, DC 20590

Re: Disadvantaged Business Enterprise Program and Disadvantaged Business Enterprise in Airport Concessions Program Implementation Modifications
Docket No. DOT–OST–2025–0897, Regulatory Identifier Number (RIN) 2105-AF33
90 Fed. Reg. 47969 (Oct. 3, 2025)

Dear Secretary Duffy:

[Southeastern Legal Foundation](#) (SLF)¹ appreciates the opportunity to submit a comment on your Interim Final Rule (IFR) ensuring that the Department of Transportation (DOT) operates its Disadvantaged Business Enterprise (DBE) and Airport Concession Disadvantaged Business Enterprise (ACDBE) Programs in accordance with current law and the U.S. Constitution. The IFR removes race- and sex-based presumptions of social disadvantage that cannot be justified, certainly under recent developments in the law. We support your efforts.

Previously, we asked DOT to take exactly this course.² We responded to your request for information regarding regulations to repeal under [Executive Order 14219](#), “Ensuring Lawful Governance and Implementing the President’s ‘Department of Government Efficiency’ Deregulatory Initiative,” and [Executive Order 14192](#), “Unleashing Prosperity Through Deregulation.” In our comment, we urged DOT to rescind the race- and sex-based presumptions in the DBE and ACDBE programs, much along the lines as proposed in the IFR.

¹ Southeastern Legal Foundation is a national, nonprofit legal organization dedicated to defending liberty and Rebuilding the American Republic®. Founded in 1976, SLF has made it its mission to protect the American people from government overreach, challenge government policies when they violate the Constitution, and restore constitutional balance in our system of government. SLF is proud to serve as Freedom’s lawyers.

² SLF’s comment was assigned comment tracking number mab-cuyk-p6zn.

Our prior comment emphasized that the race- and sex-based presumptions in the DBE and ACDBE programs fall well short of the constitutional requirements recognized by *Students for Fair Admissions, Inc. v. President & Fellows of Harv. Coll. (SFFA)*, 600 U.S. 181 (2023). We explained how the presumptions incorporate disparate impact theory requirements and should be repealed as directed by [Executive Order 14281](#), “Restoring Equality of Opportunity and Meritocracy,” as well as the [Presidential Memorandum](#), “Directing the Repeal of Unlawful Regulations” (Presidential Memo), directing agencies to repeal regulations that are clearly unconstitutional in light of *SFFA*.

In addition to this list of executive actions relevant to the IFR, DOT also correctly recognizes the significance of Executive, “Ending Radical and Wasteful Government DEI Programs and Preferencing” and [Executive Order 14173](#), “Ending Illegal Discrimination and Restoring Merit-based Opportunity.” On March 21, 2025, the Attorney General issued a [memorandum](#) to all Federal agencies on implementing these Executive Orders. Collectively, these executive actions support repeal of the race- and sex-based preferences.

DOT is right to issue the IFR. The preferences in the two programs are not lawful under *SFFA*. In truth, they were unconstitutional long before. The IFR is therefore a well judged effort to comport with the law.

Introduction

The two programs are established by regulation as, “Participation of Disadvantaged Business Enterprise in Airport Concessions” (ACDBE), *see* 49 C.F.R. §§ 23 *et seq.*, and “Participation by Disadvantaged Business Enterprises in Department of Transportation Financial Assistance Programs” (DBE), *see* 49 C.F.R. §§ 26 *et seq.* As the title indicates, both programs purport to assist “disadvantaged businesses,” a term that includes individuals who are deemed to be “socially disadvantaged.” That term is, in turn, defined based on race and sex. *See* 49 C.F.R. § 23.3 (listing races and women for ACDBE program); 49 C.F.R. § 26.5 (listing races and women for DBE program).

SLF has extensive experience litigating programs that are materially indistinguishable—that is, programs that carve out a “socially disadvantaged” category for special treatment based on race and sex in violation of both the Constitution and civil rights laws. *See, e.g., Holman v. Vilsack*, No. 21-1085, 2021 U.S. Dist. LEXIS 127334, at *35 (W.D. Tenn. Jul. 8, 2021) (enjoining program to forgive 120% of loans to “socially disadvantaged” farmers and ranchers); *see also Strickland v. USDA*, 736 F. Supp. 3d 469, 487 (N.D. Tex. 2024) (enjoining 8 disaster relief programs that provided additional benefit to “socially disadvantaged” farmers and ranchers).

Our prior challenges involved USDA, but the DOT programs are indistinguishable. They even use the same government-argot, “socially disadvantaged,” to shave the hard edges out of overt state-sanctioned discrimination. But make no mistake, as when USDA used the same term, “socially disadvantaged,” the current regulations use it as an umbrella category that mandates the use of race and sex preferences. It uses identical racial categories as USDA once did. *Compare* 49 C.F.R. § 23.3 (listing races and women for ACDBE program), *and* 49 C.F.R. § 26.5 (listing races and women for DBE program), *with Holman*, 2021 U.S. Dist. LEXIS 127334, at *2 (listing races), *and Strickland*, 736 F. Supp. 3d at 475 (listing races and women). As discussed below, “socially

disadvantaged”—whether used by USDA or DOT—is just a gentle and vague term meant to mask a race and sex preference.

Because these regulations involve state-sponsored discrimination, they lack even a glimmer of hope of surviving review in the post-*SFFA* legal landscape. DOT is wise to redefine the term “socially disadvantaged” by removing the presumption for certain races and women. In its place, DOT proposes to require that businesses make an individualized showing before DOT will consider them to be “socially and economically disadvantaged.” Until DOT adopts this neutral definition, the two programs will, by design, engage in the “sordid business [of] divvying us up by race.” *League of United Latin Am. Citizens v. Perry*, 548 U.S. 399, 511 (2006) (Roberts, C.J., concurring in part, concurring in the judgment in part, and dissenting in part).

We support you in this effort to eliminate discrimination in all its forms and stand by ready to assist you in any way possible as you restore DOT’s commitment to colorblindness and equality. All Americans deserve it.

The preferences in the DBE and ACDBE programs are certainly unlawful under *SFFA*, if they ever were constitutional at all.

The preferences violate the “twin commands” of equal protection.

The Supreme Court’s most recent denouncement on so-called “remedial” racial classifications was *SFFA*. In *SFFA*, the Supreme Court rejected a racial preference scheme independently of a tiers-of-scrutiny test because it failed to satisfy what the Court called the “twin commands” of its equal protection cases. *SFFA*, 600 U.S. at 218 (explaining that, in addition to their inability to satisfy strict scrutiny, Harvard and UNC also “fail[ed] to comply with the twin commands of the Equal Protection Clause that race may never be used as a ‘negative’ and that it may not operate as a stereotype”). The Supreme Court made clear that to justify racial discrimination the government must satisfy the “twin commands” of Equal Protection, and that these commands were *in addition* to strict scrutiny. *See id.* at 214 (explaining that the challenged systems “*also* fail to comply with the twin commands”) (emphasis added); *id.* at 219 (expressing that the admissions policies “were infirm *for a second reason as well*” as the failure to satisfy strict scrutiny (quoting *Grutter v. Bollinger*, 539 U.S. 306, 333 (2003) (emphasis added))).

Those twin commands are that “race may never be used as a ‘negative[,]’ and . . . it may not operate as a stereotype.” *Id.* at 218. And the Court did not mince words in expressing that these are *absolute* commands, that is, they can “never” be violated, no matter what compelling interest the government purports to have. *Id.* That precludes the notion that programs can survive judicial scrutiny if they violate the twin commands, even if they survive strict scrutiny—which these programs would not.³

³ Commentators have read *SFFA* as articulating new requirements to satisfy in addition to strict scrutiny. *See, e.g.,* Dan Lennington & Skyler Croy, *The Twin Commands: Streamlining Equality Litigation Based on Students for Fair Admissions*, 25 Federalist Society L. Rev. 359 n. 80 (2025) (citing Larry J. Pittman, *The Supreme Court’s Erroneous Equal Protection Clause Analysis: Societal Discrimination, the Harvard College Decision as the New Plessy v. Ferguson-Lite, and the Thirteenth Amendment*, 57 Creighton L. Rev. 189, 234 (2024) (noting the twin commands “appear[]” to be a new requirement, separate from strict scrutiny)).

The preferences in the ACDBE and DBE programs fail to comply with the twin commands. Race definitively operates as a negative. Certain races and women are presumptively favored. An individual who is not among them gets treated worse. Grant recipients must discriminate in favor of the preferred races and women to meet their overall goals if they cannot reach the set racial balancing goals through neutral means. The non-favored races and men have their race and sex operate as a negative because those characteristics adversely affect their ability to compete for federal dollars. The whole point of the goal-setting framework is to allow access to some races and women “in greater numbers than they otherwise would have been,” so “[h]ow else but ‘negative’ can race be described?” *Id.* at 219. Any suggestion that the programs do not treat race as a negative is “hard to take seriously.” *Id.* at 218. The preferences fail under the first of the twin pillars.

Race and sex also operate as a stereotype, so the preferences fail under the second requirement as well. Stereotypes are embedded in the regulations because certain races and women are presumed to be socially disadvantaged just because of their skin color or gene sequence. It demeans the “dignity and worth” of individuals to assume that just because of their skin color or sex they are (or are not) disadvantaged. *Id.* at 220 (quoting *Rice v. Cayetano*, 528 U.S. 495, 517 (2000)). Individuals falling under these race- or sex-based umbrellas have nothing in common with each other “but the color of their skin” (or their chromosomes) and the Supreme Court has “time and again forcefully rejected the notion that governmental actors may allocate preference” on this basis. *Id.* (quoting *Shaw v. Reno*, 509 U.S. 630, 647 (1993)). The preferences thus fail the second of the twin pillars as well.

Preferences like these should, and will, fail. Other courts have noted that the illogic of these sorts of “socially and economically disadvantaged” categories is “absolutely radiant,” because they treat “Oprah Winfrey [as] presumptively disadvantaged, while . . . even more disadvantaged Americans are not.” *Nuziard v. Minority Bus. Dev. Agency*, 721 F. Supp. 3d 431, 491–92 (N.D. Tex. 2024). Naturally, this makes no sense. The preferences are reliant on blunt and outdated stereotypes and will fall if challenged.

The preferences violate the twin commands of Equal Protection Clause and so they fail on their face.

The discriminatory preferences lack a “logical end point.”

There’s another reason why the preferences fail on their face. They have no end in sight and any race preference must also have a “logical end point.” These, however, are designed to exist in perpetuity, making them impermissible.

Race-based programs must have a “logical end point.” *SFFA*, 600 U.S. at 221 (quoting *Grutter*, 539 U.S. at 342). The programs have no sunset provision and will exist forever absent regulatory action. The current goals framework suggests that the programs are designed to remain until any statistical disparities between the favored and non-favored races cease. That is unconstitutional.

“The problem with [this] approach[] is well established.” *Id.* at 223. “Even if it is not outright racial balancing,” it treats individuals “as simply components of racial, religious, sexual or national class,” because the racial preferences will only cease to be mandatory “when some rough percentage of various racial groups” is included in the total funding picture. *Id.* (quoting *Miller v. Johnson*, 515 U.S. 900, 911 (1995)). Much like Harvard, the programs as designed

“think[] about the use of race” and sex in their funding provisions the same way as they did when the programs began decades ago—until all races are represented in its programs to the same degree as their number of minority-owned businesses, discrimination is necessary. *Id.* at 225.

The preferences are not being phased out under the existing regulatory regime. It does not account for the dramatic gains made by members of races historically subject to discrimination or women. Nor does it account for the extraordinary acts of intervention taken by the government to remediate its past discrimination in contracting.

These preferences have been alive and discriminatory for far longer than the 25-year period the Supreme Court gave racial preferences in higher education to run out. *See id.* at 224 (citing *Grutter*, 539 U.S. at 343). DOT has disclosed that these preferences have “spann[ed] nearly 40 years.” 90 Fed. Reg. 47970. If 25 years was too long to discriminate in college admissions, 40 years and counting of discrimination in DOT funding is far, far too long.

The preferences are facially unconstitutional before courts even assess their legitimacy under strict scrutiny. But they surely fail that demanding test as well under longstanding precedents.

The preferences are certain to fail to satisfy strict scrutiny.

The preferences for both ACDBE and DBE programs fail under the demanding strict scrutiny test that ensures that racial classifications are used only “as a last resort.” *Bartlett v. Strickland*, 556 U.S. 1, 21 (2009). Under this test, the racial classifications must first “further compelling government interests.” *Gratz v. Bollinger*, 539 U.S. 244, 270 (2003). Second, the use of race must be “‘narrowly tailored’—meaning ‘necessary’—to achieve that interest.” *SFFA*, 600 U.S. at 207 (quoting *Fisher v. Univ. of Tex. at Austin*, 570 U.S. 297, 311–12 (2013)).

The preferences lack a compelling interest.

Remediating specific, identified instances of past discrimination on the part of the government is one of the few compelling interests that permits state-sanctioned discrimination. *See id.* To satisfy this interest, the government must make three showings. *Vitolo v. Guzman*, 999 F.3d 353, 361 (6th Cir. 2021). First, “[i]t cannot rest on a ‘generalized assertion that there has been past discrimination in an entire industry.’” *Id.* (quoting *City of Richmond v. J.A. Croson Co.*, 488 U.S. 469, 498 (1989)). “Second, there must be evidence of *intentional* discrimination in the past.” *Id.* at 361 (emphasis original) (citing *Croson*, 488 U.S. at 503). “Third, the government must have had a hand in the past discrimination it now seeks to remedy.” *Id.*

The ACDBE and DBE preferences do not come close to satisfying these criteria. First, they rest on generalized assertions of past discrimination. It requires recipients to set overall goals based on the relative availability of ACDBE and DBE entities that are ready, willing, and able to do the particular job in the relevant market in the presumed absence of discrimination. 49 C.F.R. §§ 23.51(a); 26.45(b). And that goal is determined by looking at the number of available ACDBEs and DBEs and comparing them with the overall market, with the assumption being that any gap is attributable to the effects of discrimination thus necessitating an overall goal, even if it involves a race or sex preference. *See id.* §§ 23.51(c), (d) (calculating ACDBE overall goals); 26.45(c), (d) (calculating DBE overall goals).

That system is not good enough. The Constitution requires a showing of *discrimination*, not *disparities*. These are not synonymous terms; “there are simply too many variables to support inferences of intentional discrimination.” *Vitolo*, 999 F.3d at 362 (6th Cir. 2021) (citing *Croson*, 488 U.S. at 501–03; *Associated Gen. Contrs. of Ohio, Inc. v. Drabik*, 214 F.3d 730, 736–37 (6th Cir. 2000)). Many factors can lead to disparities that appear to cut along racial lines, and to assume all disparities equate to racial discrimination is wrong. See *Mich. Rd. Builders v. Milliken*, 834 F.2d 583, 592 (6th Cir. 1987) (“Small businesses, *as a result of their size*, were unable to effectively compete for state contracts.” (emphasis preserved)); *Eng’g Contrs. Ass’n v. Metro. Dade Cnty.*, 122 F.3d 895, 917 (11th Cir. 1997) (“More simply put: Because they are bigger, bigger firms have a bigger chance to win bigger contracts.”). DOT’s current regulations accord these disparities “talismanic significance” by authorizing racial goals that must be met when the Constitution demands far more. *Peightal v. Metro. Dade Cnty.*, 26 F.3d 1545, 1556 (11th Cir. 1994). The preferences fail to meet this most basic requirement.

At most, statistical evidence can identify a disparity, but that falls short of a “strong basis” in evidence of intentional discrimination. *Wygant v. Jackson Bd. of Educ.*, 476 U.S. 267, 277 (1986). Even if the gaps identified by DOT’s overall goal requirement were attributable to the legacy effects of historic discrimination, “alleviat[ing] the effects of societal discrimination is not a compelling interest.” *Vitolo*, 999 F.3d at 362 (quoting *Shaw*, 517 U.S. at 909–10). It is not even an important enough interest to satisfy intermediate scrutiny. *Id.* at 364 (stating that “general claims of societal [sex] discrimination are not enough”) (citing *Hogan*, 458 U.S. at 727–29). DOT cannot require discrimination until discrimination is solved. After all, “[t]he way to stop discrimination on the basis of race is to stop discriminating on the basis of race.” *Parents Involved in Cmty. Sch. v. Seattle Sch. Dist. No. 1*, 551 U.S. 701, 748 (2007) (plurality op.).

Second, DOT’s current regulations do not require a showing of *intentional* discrimination at all and not from the recipients who must do the discrimination. See *Vitolo*, 999 F.3d at 361. The objective in setting the overall goals is to merely estimate the amount of work that would be performed by ACDBEs and DBEs absent the effects of discrimination (which the regulations presume), see 49 C.F.R. §§ 23.51(a), 26.45(b)). That’s all. To assume that this equates to the amount of work that ACDBEs and DBEs would perform in the absence of past discrimination involves “sheer speculation”; the overall goals are not tied “in any realistic sense” to “any injury suffered by anyone.” *Croson*, 488 U.S. at 498. Although the recipients are supposed to determine the extent to which firms “suffered discrimination or its effects” in connection with concession opportunities or related opportunities, see 49 C.F.R. § 23.51(a)(2), it is unclear how that works in the actual formulation of the overall goals. More importantly, the regulations do not require any showing of past intentional discrimination against the races who benefit.

Still more, the overall goal number is based on statistical disparity studies, but these fail to establish a compelling interest. The goal number is calculated by taking the relative availability of ACDBEs and DBEs—one statistic—and then adjusted by several factors including disparity studies—another set of statistics. 49 C.F.R. §§ 23.51(c)-(d), 26.45(c)-(d). But “statistics don’t cut it.” *Vitolo*, 999 F.3d at 361 (citing *Aiken v. City of Memphis*, 37 F.3d 1155, 1162–63 (6th Cir. 1994) (en banc); *United Black Firefighters Ass’n v. City of Akron*, 976 F.2d 999, 1011 (6th Cir. 1992)). Making it worse, the statistics can rely on the sort of disparate impact studies that are now impermissible under EO 14281. See 49 C.F.R. §§ 23.51(c)(3), (d)(3)(1); *id.* §§ 26.45(c)(3),

(d)(1)(ii), (d)(2)(i). Without the required showing of *intentional* discrimination, the preferences lack a compelling interest.

The only limit imposed by the regulations before adopting a racial preference is the requirement to exhaust neutral measures first. But this token effort to satisfy narrow tailoring only comes into play if the recipients have a compelling interest in the first place. If there is no showing of intentional discrimination, no compelling interest exists at all. The purportedly neutral measures requirement will not save the programs.

Another reason why the preferences fail the intentional discrimination requirement is that they do not purport to address “intentional discrimination against the many groups to whom it grants preferences.” *Vitolo*, 999 F.3d at 361. Discrimination against one race can justify a preference in favor of a different one. To take but one example, the regulations permit preferring Native Alaskans, but do not require a showing of intentional discrimination against Native Alaskans specifically. A showing of past discrimination against black Americans will allow an individual claiming Native Alaskan heritage to receive a presumption if they meet DOT’s idea of what meets the “minimum blood quantum” to qualify as authentically Native. *See* 49 C.F.R. § 23.3. DOT’s regulations lump all races together. But the constitution requires a specific showing of intentional discrimination against *each* individual racial group granted a preference. *See Holman v. Vilsack*, 127 F.4th 660, 664 (6th Cir. 2025) (Thapur, J., dissenting from denial of rehearing en banc) (“[T]he government can’t sneak in racial discrimination in favor of one group on the back of evidence of past racial discrimination against another.”).

The preferences also fail to satisfy the third criteria for compelling interest—that the government “had a hand” in the racial discrimination it attempts to remedy. *See Vitolo*, 999 F.3d at 361. The mere fact that someone somewhere may have discriminated against these groups at some point in time does not mean that *the government* did. But that’s a necessary showing before the government can discriminate against its own citizens. Yet because the programs do not require a showing of intentional discrimination of any kind, they certainly do not require a showing that the government did it. The programs lack a compelling interest.

It is true that a handful of federal circuits have upheld DOT’s use of the “socially disadvantaged” category, but none recently. *See Midwest Fence Corp. v. U.S. Dep’t of Transp.*, 840 F.3d 932, 941, 935–36 (7th Cir. 2016); *Sherbrooke Turf, Inc. v. Minn. Dep’t of Transp.*, 345 F.3d 964, 967–68 (8th Cir. 2003); *W. States Paving Co. v. Wash. State Dep’t of Transp.*, 407 F.3d 983, 995 (9th Cir. 2005); *cf. Adarand Constructors, Inc. v. Peña*, 16 F.3d 1537, 1539, 1544 (10th Cir. 1994), *vacated and remanded*, 515 U.S. 200 (1995), *sub nom. Adarand Constructors, Inc. v. Slater*, 228 F.3d 1147 (10th Cir. 2000). More recently, courts have struck down similar programs. *See, e.g., Mid-America Milling Co. v. U.S. Dep’t of Transp.*, No. 3:23–cv–00072 (E.D. Ky. May 28, 2025); *Nuziard v. Minority Bus. Dev. Agency*, 721 F. Supp. 3d 431 (N.D. Tex. 2024); *Ultima Servs. Corp. v. U.S. Dep’t of Agric.*, 683 F. Supp. 3d 745 (E.D. Tenn. 2023). And even these older precedents upholding the preferences must be periodically reexamined given the Supreme Court’s admonition that preferences must have a “logical end point.” *SFFA*, 600 U.S. at 221 (quoting *Grutter*, 539 U.S. at 342). As it stands, the general statistical disparities that these Circuits once accepted as sufficient based on past historical injustices cannot continue to furnish an evergreen justification for unequal treatment. *Id.* at 227 (“Opening that door would shutter another—‘[t]he

dream of a Nation of equal citizens . . . would be lost in a mosaic of shifting preferences based on inherently unmeasurable claims of past wrongs.” (quoting *Croson*, 488 U.S. at 505–06)).

Neither program is narrowly tailored.

Even if DOT’s preferences ever had a compelling interest, the lines they draw are not narrowly tailored on their face. A preference is not narrowly tailored if it is “either overbroad or underinclusive in its use of racial classifications.” *Vitolo*, 999 F.3d at 362 (citing *Croson*, 488 U.S. at 507–08; *Gratz*, 539 U.S. at 273–75). The specific racial categories DOT favors as “socially disadvantaged” are a slapdash mess.

The Supreme Court recently called nearly identical categories “imprecise,” “overbroad,” and “arbitrary or undefined.” *SFFA*, 600 U.S. at 216. Justice Gorsuch went so far as to call these categories “incoherent.” *Id.* at 291 (Gorsuch, J., concurring). These categories were created by ideological bureaucrats “without any input from anthropologists, sociologists, ethnologists, or other experts,” and were then rigidly implemented for decades even though the same federal regulators who devised them cautioned that they “should not be interpreted as being scientific . . . nor should they be viewed as determinants of eligibility for participation in any Federal program.” *Id.* (quotation marks omitted). Yet the current framework employs almost the same baseless racial categories. They are too crude to survive narrow tailoring and must be abandoned.

Perhaps no court has better demonstrated how arbitrary this racial framework is than the Court of Appeals for the Sixth Circuit. Recently, the Sixth Circuit wondered aloud how the government could draw lines that discriminated in favor of “Pakistanis but not Afghans; Japanese but not Iraqis; Hispanics but not Middle Easterners . . .” *Vitolo*, 999 F.3d at 361. Five judges later characterized just the “Asian” category as “indefensible,” emphasizing that USDA’s crude racial categorization are “less refined than that of the 1890 census takers.” *Holman*, 127 F.4th at 664 (Thapur, J., dissenting from denial of rehearing en banc) (“If those who used the racially stigmatizing term ‘octoroon’ can grasp that ‘Asians’ aren’t all the same, surely the government today can too.”). DOT’s categories, which include an assessment of “bloodlines,” 49 C.F.R. § 23.3, or whether one’s ancestors were “natives,” *id.*, are just as indefensible.

Conclusion

It is indeed a “sordid business, this divvying us up by race.” *League of United Latin Am. Citizens*, 548 U.S. at 511 (Roberts, C.J., concurring in part, concurring in the judgment in part, and dissenting in part). For far too long DOT has forced its funding recipients to do exactly that, sorting Americans into ugly racial boxes and forcing them to compete against each other not based on merit, but skin color and sex. DOT is commendably charting a new course. If “[e]liminating racial discrimination means eliminating all of it,” *SFFA*, 600 U.S. at 184, DOT is correct to unwind its discriminatory programs.

On behalf of SLF, we thank you for the opportunity to be heard in this process. If we can lend you any additional assistance, please reach out to us.

Yours in Freedom,



Southeastern Legal Foundation