

REPORT Published December 20, 2021 • 17 minute read

Who Manufactured Virginia's "Critical Race Theory" Debate?







A student free speech group seemingly devoid of students. A Virginia PAC that is really from out of state. Local grassroots organizations that, in fact, are led by national ultra-right professional operatives. Fake Facebook accounts, conspiracy theorists, avowed racists and those who promote the view that the January 6 $^{\rm th}$ Capitol riots was the work of radical left.

Critical Race Theory went from the dusty shelves of a Harvard Law School library to one of the dominant discussions on cable news, social media and print journalism often coinciding with the 2021 Virginia gubernatorial race. How did it happen? After all, though issues of racial justice were part of an increasingly heated national debate, Democratic candidates for office weren't espousing that Critical Race Theory (CRT) be taught in the Virginia public schools.

In this paper we looked at the emergence of CRT in the Virginia gubernatorial race as a case study. We found that rather than it coming from the ground up – from parents concerned about curriculum taught

in schools – the CRT issue was manufactured, pushed and spread by dark money organizations who have no interest in an honest discussion or debate surrounding education or schools or race.

It is our hope that this paper will lead to a more balanced discussion and coverage of CRT and other hotbutton cultural issues in the future. We hope that by uncovering the puppet masters behind this debate, there will be an appropriate level of scrutiny and skepticism toward spoon-fed assertions by professional, far-right activists.

Specifically, in this paper, Third Way examined several major organizations dedicated to dividing voters on Critical Race Theory (CRT), mostly centered in Virginia's Loudoun and Fairfax counties. These groups—Parents Defending Education (PDE), Parents Against Critical Theory (PACT), Fight For Schools (FFS), and the Virginia Project—are not grassroots, citizen-led organizations. Rather, they are run by long-time conservative political activists and pushed by the right-wing media ecosystem. Both before and during the Virginia gubernatorial election, they were key to sowing the seeds of division around CRT and lending the veneer of a 'grassroots' movement.

- Anti-CRT efforts in Virginia and elsewhere are run by overlapping networks of conservative activists, paired with a handful of local interested individuals, who try to make any discussion of race in American public schools in schools toxic.
- Despite intense conservative media interest, these vocal groups are relatively small in numbers and have a marginal Internet presence.
- These groups are heavily interwoven with Republican Party organizations, established conservative movement groups, and longtime right-wing activists, suggesting these efforts are more about achieving short-term political goals than engaging in a real conversation about curriculum or race.

Some people are treating [CRT] like a gold rush. This is a new area where people think they can either become famous or make money on the issue, and they're probably right.—

Jonathan O'Brien, conservative education advocate ¹

Virginia's Anti-CRT Groups

Virginia became an early battleground state for CRT, with school board meetings across the state inundated with anti-CRT protesters that gained extensive media coverage. But what may have appeared to be a grassroots parent-led movement on the surface upon closer examination is a carefully manufactured debate that was led by beltway insider right-wing operatives and out-of-state grifters.

Unlike in Virginia, with its much-watched off-year election, just over the Potomac in Maryland there has been little, if any, attention paid to these issues. Even with similar demographics and student populations, local school boards haven't been inundated. Right-wing operatives across the country want Americans to believe the debate on CRT is a grassroots swell, but the identities of those who are pushing

the debate show it's anything but. Here's a sample of some of the principal CRT ringleaders stoking anger and division in Virginia schools.

Conservative Activists Masquerading as Grassroots: Parents Defending Education (PDE)

While their name would imply they are an organization of parents concerned for the quality of their children's education, Parents Defending Education (PDE) is in fact a right-wing professional advocacy organization trying to conflate the slightest discussion of race or equity with CRT.

They claim that CRT activists are infiltrating schools by using words such as "diversity," "equity," "inclusion training," "anti-racism," "racial sensitivity," "social emotional learning," "racial prejudice," "white supremacy," among others.

The group continually harasses local school districts by submitting complaints to the Department of Education's Office for Civil Rights, claiming discrimination in various school districts. But while they rail against critical race theory in their social media comment, their actual complaints have nothing to do with the subject. They seemingly object to efforts by school districts to support their students in the wake of extremely challenging events. In PDE's view, a Massachusetts public school hosting Zoom sessions "for Asian and Asian American Students and others in the BIPOC community who wish to process recent events," after the killing of eight



How to Spot CRT? Codenames & Keywords



Often, CRT programs are masqueraded in pleasant-sounding yet ambiguous names.

Common Codenames for CRT:

Diversity, equity and inclusion training, anti-racism initiative, racial sensitivity training, racial healing, social emotional learning, critical self-awareness, anti-bias training, culturally responsive practices, critical ethnic studies, critical pedagogy, free radical therapy, free radical self/collective care, action civies...

Keywords of a CRT framework:

White supremacy, systemic racism, white privilege, white fragility, intersectional identities, internalized racism, anti-racism, white social capital, color ism, interrupting racism, racialized identity, racial prejudice, educational justice, anti-blackness, abolitionist teaching, spirit murdering, land acknowledgement, representation and inclusion...

Source: PDE Facebook post from May 11, 2021.

people, six of them Asian, in Atlanta was racial discrimination. ²

PDE would have Virginians believe they are a broad grassroots organization devoted to safeguarding educational quality. In reality, they are longtime conservative activists conflating anything remotely related to equity or diversity with Critical Race Theory.

They similarly filed a letter on May 10, 2021 complaining after the Columbus City School Board in Columbus, Ohio issued a statement that it will try to end systemic racism in the district. ³ This school

board issued this statement following the killing of two students in the district on a single day: one in a police-involved shooting, and another in criminal act.

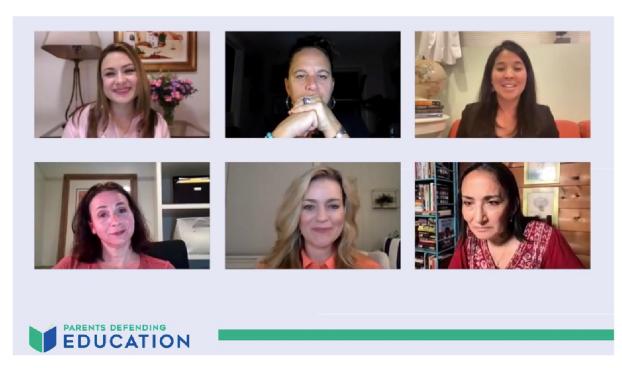
An Inauthentic Grassroots Organization

PDE wants voters and the media to believe they are a true grassroots parents' organization PDE's, but their connections and network are a tangled web of far-right conservative activists. They've partnered with other regional anti-CRT organizations such as PACT, No Left Turn in Education, and the Center for Renewing America. The latter organization was founded by Russell Vought, President Donald Trump's former director of the Office of Management and Budget and the individual who drafted Trump's anti-CRT executive order in September 2020. ⁴ This widely criticized executive order would have banned any diversity or workplace sensitivity training across the federal government and contractors, in the name of combatting CRT, something that exists nowhere in federal training. And like so many of the Trump administration's stances, it equates an accurate understanding of American history with "un-American propaganda."

PDE established its website, created its social media handles, and submitted incorporation documents to the IRS at least two months before "going live," approximately at the same time. ⁵ For authentic grassroots organizations with organic growth models, social media pages and handles are usually established prior to founding a website due to the lack of cost and ease of use—clearly that wasn't the case here.

And Vought is hardly the only Trump official PDE affiliates with. Multiple former Trump Secretary of Education Betsy DeVos-connected personnel appear in their media, including:

- Elizabeth Schultz, a former Trump Education Department official and former Fairfax County school board member, best known for opposing protections for transgender students.
- Kimberly Richey, a former Trump Education Department official and former state counsel for Oklahoma's state superintendent of education, Janet Baressi.
- Aimee Viana, the Trump Education Department's executive director for Education excellence for
 Hispanics. Viana is the sister-in-law of one of the Trump White House's strategic communications
 directors, Mercedes Schlapp. Schlapp's husband is Matt Schlapp, the American Conservative Union
 chairman and one of the foremost purveyors of baseless stolen election claims from 2020.



Source: Screenshot from an August 25 2021 Facebook Live presentation. Top row (L-R): Aimee Viana, Erika Sanzi, Nicole Neily; Bottom row (L-R) Marissa Fallon, Kim Richie, Asra Nomani.

Peddling a False Narrative on CRT

PDE has also developed a so-called "IndoctriNation Map,"— an online map of the United States which highlights school districts where an activity the group deems controversial occurs. The goal seems to be scaring parents into believe that CRT is spreading rapidly across the nation's school. In reality, these actions have nothing to do with curriculum or CRT. Effectively, if a school presents itself as inclusive or welcoming, PDE considers it indoctrination.

there are problems everywhere... but there are also people fighting back. IndoctriNation Map



Source: Screenshot of PDE's "IndoctriNation Map" (August 2021).

- The Shaler Area School District in Pennsylvania issued a statement reaffirming its commitment to teaching acceptance, inclusion, and anti-racism following the death of George Floyd.
- The Anchorage School District in Alaska is providing book titles as "equity resources," including *The Autobiography of Martin Luther King Jr.*, among other publications. ⁹

PDE also provides informational materials to interested individuals, including how to "get involved" in one's local school district, and how to run for school boards and "winning your PTA". Furthermore, PDE offers advice on creating "anti-woke" social media, including how to create anonymous Instagram and Gmail accounts.

Run by Longtime Conservative Establishment Operatives

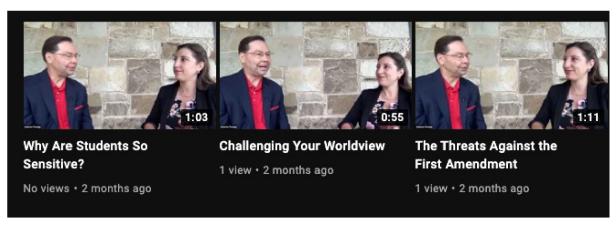
PDE's President, Nicole "Nicki" Neily (née Kurokawa), is a longtime foot soldier for conservative and libertarian causes. An Illinois native and current Arlington, VA resident ¹⁰, Neily has worked her entire career for Koch Family groups or right-wing political firms, including:

• The Franklin Center for Government and Public Integrity, as its president (2016–2017). The *Columbia Journalism Review* in 2013 called this organization the Koch brothers' "biggest journalism investment to date." ¹¹

- Dezenhall Resources, Ltd. as its vice president and SVP (2012-2016). While Neily was employed there, this public relations firm had worked with Purdue Pharma—a longtime client—to undermine the Obama Administration's efforts to develop national standards for addictive opioid painkillers. ¹²
 Dezenhall is perhaps best known for creating an astroturf organization which attacked Greenpeace on behalf of ExxonMobil.
- The Independent Women's Forum's executive director (2011-early 2012), an organization aligned with the Koch-backed Americans For Prosperity group. ¹³
- Cato Institute, as its media manager and then external relations manager (2006-2009). Cato was originally incorporated as the "Charles Koch Foundation" in the 1970s; funds controlled by the Koch family as well as other right-wing foundations continue to give Cato millions of dollars annually. ¹⁴
- Prior to her time with Cato, Neily was affiliated with other Koch-backed organizations such as
 FreedomWorks and the Competitive Enterprise Institute (CEI), where she was a "Koch summer
 fellow." 15

President of Another Dark Money Education Organization

Neily is also the President of "Speech First," another conservative astroturf organization. Despite claiming to advocate on students' behalf, it is not a genuine student group. By her own admission in 2018, "no students were involved in founding the group." ¹⁶



Source: Screenshot of Speech First's YouTube channel.

Speech First's slick videos discussing its ideas have few views and thus little traction; for example, one of its *YouTube* videos entitled, "Why Are Students So Sensitive?" with the Heritage Foundation's Hans von Spakovsky, who is perhaps best known for promoting unfounded fears about voter fraud, has had no views at the time of this report's writing. This suggests that not even Speech First's employees have clicked on its own videos.

Speech First's treasurer in 2018 was Kim Dennis, who also serves as the president of DonorsTrust, the secretary of the Donors Capital Fund, and the president of the Searle Freedom Trust. These groups are

known for anonymously managing wealthy conservatives' money and directing them toward conservative causes while cloaking their donors.

 Donors Trust disbursed \$165 million in 2019, including, among other groups, \$1.5 million to the white nationalist hate groups VDARE and American Renaissance, according to the Center for Media and Democracy. 17

The Conspiracy Theorist: Parents Against Critical Theory (PACT)

Parents Against Critical Theory (PACT) is a group that claims to be a "grassroots advocacy and outreach organization that is adamantly opposed to Critical Race Theory in all forms." In reality, they are a farright group with connections to QAnon and led by Scott Mineo, who also operates a fake Facebook account to spread conspiracy theories and misinformation. Based in Loudoun County, VA, the organization takes an inflammatory tone against anything it deems "CRT" and spread a constant stream of anti-CRT misinformation during the Virginia election.

Parents Against Critical Race Theory is a front for a conservative conspiracy peddler with ties to QAnon.

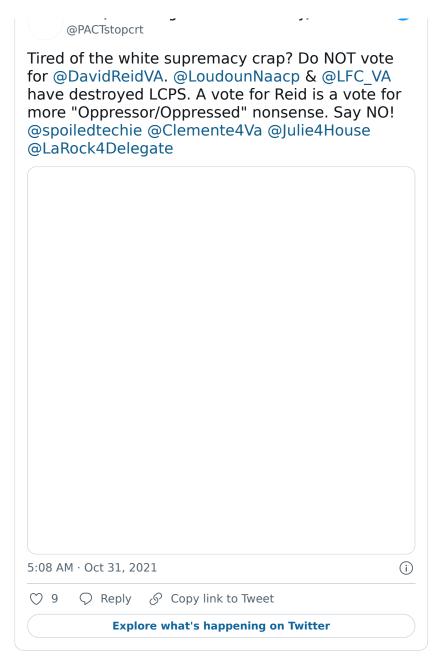
Mineo also claimed in the press and on his website that teaching CRT is explicitly "anti-white," ¹⁸ that CRT is "poison," and that the CRT "lifecycle" is "infiltration, transformation, and indoctrination." On the PACT website, in bold red letters, it proclaims "Critical Race Theory is a Nationwide Pandemic":

Critical Race Theory Is a Nationwide Pandemic

- CRT has infected academia, entertainment, government, schools, finance & law, sports, and corporations
- Underneath the CRT umbrella are many different types of "Trojan Horses" disquised as CRT:
- Diversity, Inclusion, Culturally Responsive Instruction (Framework),
 Ethnic Studies, and of course Equity
- It redefines America's history as a struggle between "oppressors" (white people) and the "oppressed" (everybody else)
- · Rejects all potential alternatives to CRT
- . Anyone who disagrees is racist even if those people are "non-white"
- CRT curriculum focuses on cultural misrepresentation and social justice that adversely impacts math, science, and history
- · CRT generates billions and billions of dollars for the Grievance Industry
- CRT not only impacts white people, it is also destructive to every other ethnic group
- · Racism is present in every aspect of life, relationship, and interaction

Source: Screenshot of PACT's website.

Throughout the Virginia election, especially in the latter weeks, the organization pushed divisive social media content mischaracterizing CRT and issues surrounding racial equality. These include consistently misconstruing CRT and framing the statewide election effectively as a referendum on parental rights and education.



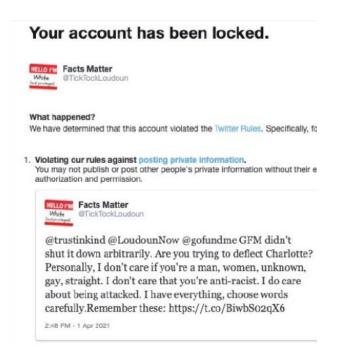


The organization also worked with one of QAnon's earliest boosters, Tracy Diaz (know also asTracyBeanz) through her "UncoverDC" organization to cover a June 8 school board meeting in Ashburn, VA. ¹⁹ PACT also worked with the John Spiropolous of the far right-wing outlet One America News (OAN) on that effort.

- One of PACT's fundraising efforts in March 2021 was shut down by GoFundMe, according to the right-wing outlet *Daily Caller*. ²⁰ Mineo now works with GiveSendGo, the largest "Christian crowdfunding" site on the Internet.
- Mineo used to have a Twitter account
 "@TickTockLoudoun" but Twitter locked this
 in April 2021 for making threats and posting
 private information.

A Fake Persona to Spread Misinformation

PACT's founder, Scott Mineo, also works outside the organization's official media to further spread conspiracy theories and issues around race via a Facebook alter ego, "Vito Malara." ²¹ On this



Source: Screenshot of the locking of Scott Mineo's Twitter acc

Facebook account, Mineo discusses CRT, questions COVID vaccines, dismisses rights for transgender people, and spreads 2020 election conspiracies, among other hot-button issues. He also frequently criticizes the NAACP, calling the longtime civil rights organization a "radical group," "scumbags," "racists," "troublemakers," and "victim creators."



Source: Facebook screenshot capture of Scott Mineo AKA "Vito Malara" at an event for the 2021 Loudoun Conservative Gala at the Trump National Golf Club Washington, with Sebastian and Katharine Gorka.

Prior to his interest in CRT, Mineo followed many of the other right-wing topics that have waxed and waned over the years. In 2018, his "Vito Malara" alter-ego made repeated comments on Facebook about

"illegals" from "shithole countries," echoing President Trump's rhetoric at the time. Prior to that, he complained about "sharia law," "radical Islam," and kneeling football players.



Pack of savages. Is this just another example of black youth's being frustrated and expressing themselves? Nope. Just another day for many inner city blacks and innocent white victims.

Source: Facebook screenshot capture of Vito Malara.

- In 2017, he called black youths a "pack of savages," quoting a *Blaze* article about crime in Baltimore.
- After President Trump called racists "very fine people" in Charlottesville in 2017, Mineo wrote that the former president was "100% dead accurate."
- In 2017, Mineo wrote on Facebook about Muslims that they will "NOT assimilate they only assassinate. How can anyone defend an ideology, NOT a religion, where the brainwashed murdering LOSERS worship a man, a pedophile named Mohammed, who married a 6 year old girl?"



If you haven't seen this yet, you need to watch (16 minutes long). He was 100% dead accurate and he took it to the media like I hadn't seen in a long while.



YOUTUBE.COM

President Trump Gets Real with Media During Press Conference

Trump was supposed to give remarks about infrastructure but things escalated quickly.

Source: Facebook screenshot capture of Vito Malara.



22 kids were just blown up because of the peaceful and loving religion and people are offended at this billboard? Really? Nothing wrong with a gentle reminder of the facts.

These people will NOT assimilate they only assassinate. How can anyone defend an ideology, NOT a religion, where the brainwashed murdering LOSERS worship a man, a pedophile named Mohammed, who married a 6 year old girl?

Source: Facebook screenshot capture of Vito Malara.

The Professional Republican Operatives: Fight For Schools Political Action Committee

The "Fight For Schools" (FFS) political action committee is a right-wing organization dedicated to recalling Loudoun County, VA, school board members it claims are implementing "CRT concepts" in

public schools. FFS PAC is led by Ian Prior, a long-time Republican operative with clear ties to the inside the beltway Republican establishment. Prior worked within the Trump Administration as public affairs deputy director at the Department of Justice. And he has been actively involved in the Republican campaign world for years, serving as National Republican Congressional Committee press secretary. Prior also worked as the communications director for Karl Rove's super PAC "American Crossroads" and the Mitch McConnell-controlled "Senate Leadership Fund" PAC.

Prior took this experience and network to make CRT a political and campaign issue in Virginia. FFS claimed six Loudoun County school board members were part of a private Facebook group that was reportedly about to target parents opposed to CRT. ²² And throughout the election, the organization continued to push CRT as a central issue in their social media content.

Fight For Schools leadership is deeply tied to the Republican campaign and political world, with connections to President Trump, Mitch McConnell, Karl Rove, and the RCCC.

Prior also runs "Headwaters Media, LLC," a Virginia-based public relations firm which targets local media outlets—although it appears he often pitches his work in right-wing, pay-to-play websites that pretend to be legitimate news websites but are actually funded by right-wing organizations, according to a *New York Times* investigation. ²³



e: Facebook screenshot of Ian Prior, with former Loudoun y school board member John Beatty, and PACT's Scott Mineo ptember 8, 2021's "Rally To Save Our Schools" in Lansdowne t in Leesburg, VA.

Prior was behind laudatory articles in these payto-play websites about Sens. Lindsey Graham (R-SC) and Roy Blunt (R-MO), as well as articles in 2020 disparaging Maine Speaker of the House Sara Gideon, who was running against Sen. Susan Collins (R-ME) that year. ²⁴

As of this summer, Prior worked for the Texas Attorney General Ken Paxton's reelection campaign, working to place articles in pay-to-play Texas publications. ²⁵ Paxton has been dogged for half a decade by an indictment on securities fraud charges but has yet to stand trial. He is also independently accused of bribery and abuse of power by intervening on behalf in his friends' legal troubles in Texas, prompting an FBI investigation. ²⁶

The Out of State Scheme: The Virginia Project (TVP)

The Virginia Project (TVP) is a small-time political action committee (PAC) dedicated to an "infrastructure-building and information-distribution initiative [sic] intended to even the playing field for Republicans." This group was founded in late 2019.

The Virginia Project is an out of state political action committee, skirting campaign finance laws under the guise of legal fee fundraising.

TVP appears to skirt campaign finance law by directly advising donors on its website to contribute directly to its legal counsel in order to shield their identities in campaign finance reports. ²⁷

Loudoun County Incident

As you may be aware, since it has repeatedly been in national and even international news recently, we uncovered a <u>parent-targeting ring connected to an extremist School Board member</u> in Loudoun County, Virginia; its most notable distinction, besides being the wealthiest county in the United States, is the seemingly-weekly national scandals for the antics of the insane left in its government. A great deal of investigation is in process and litigation is presently being prepared.

If you are interested in supporting legal action against the perpetrators in this case, but do not wish to be identified as required in compliance reports, sending a check directly to our legal counsel does not count under law as a contribution to our political action committee and is not subject to reporting. We prefer contributions to our <u>Civil Rights Defense Fund</u> as these can be used for additional activities such as FOIA requests, but we understand that many are concerned with the risk of retaliation from "woke" cults and "woke" employers that appearing on a compliance report may subject them.

To donate to the effort with this method, please send a check with memo "Virginia Project" to:

The Bradfield Injury Law Firm, PC. 11048 Warwick Boulevard Suite 1B Newport News, VA 23601-3229

© 2019-2021 The Virginia Project

Paid for by Virginia Project PAC (virginiaproject.com)









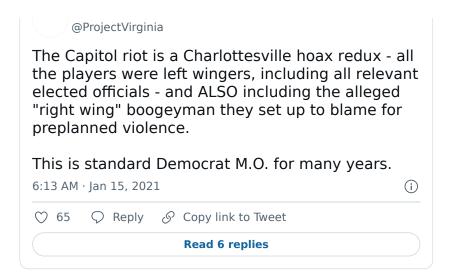
Source: Screenshot of The Virginia Project's website.

TVP's largest donor is an Alexandria VA-based PAC, The Committee for Police Officer's Defense (COPD), which donated \$100,000 between April-June 2021. This organization's treasurer is the Nevada-based Kecia Pollock, who is also involved in running so-called "ScamPACs" with her husband William, an officer with the Las Vegas Metropolitan Police Department.

- These Pollock-controlled PACs raised almost \$4 million in small dollar donations from 2017 to 2019, but then redirected \$3.7 million to a Las Vegas businessman, Richard Zeitlin, according to a Center for Public Integrity. 28
- The Pollocks reportedly pocketed \$150,000 for their efforts. ²⁹

While TVP's existence predates the right-wing's 2021 interest in CRT, it has quickly shifted to take advantage of media interest in this topic. While much of what TVP does is to promote Republican Party candidates in Virginia on its website, the organization spends much of its social media energy across Twitter, Facebook, Gab, and YouTube boosting current right-wing conspiracies.





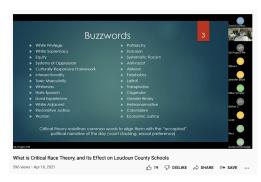
• Beyond CRT, TVP adopts a conspiratorial mindset on social media about a host of hot-button rightwing issues, including the January 6, 2021 attack on Capitol Hill.

The group's founder, David Gordon, is a resident of Pendleton, South Carolina with a background as an IT engineer. When a reporter in May 2021 asked him why he was running a Virginia PAC from out-of-state, he replied, "I am a subject matter expert on the dysfunctionality of the Virginia Republican Party. I know how to fix it." ³⁰



TVP runs a group called the "Program on Un-American Activities," which focuses on anti-CRT issues. On March 7, 2021, it held, alongside Loudoun County-based anti-CRT organization Parents Against Critical Theory (PACT), a presentation titled "What is Critical Race Theory and Its Impact on Loudoun County Schools."

 During this presentation, TVP founder Dave Gordon called critical race theorists "un-American" and "terrorists—there's really no other word for them." ³¹ • Later in the presentation, a TVP presenter suggests CRT today "denies science" and is a "national security threat" akin to the Chinese Cultural Revolution (1966-1976), a cataclysmic decade in Chinese history where up to 20 million people died. ³²



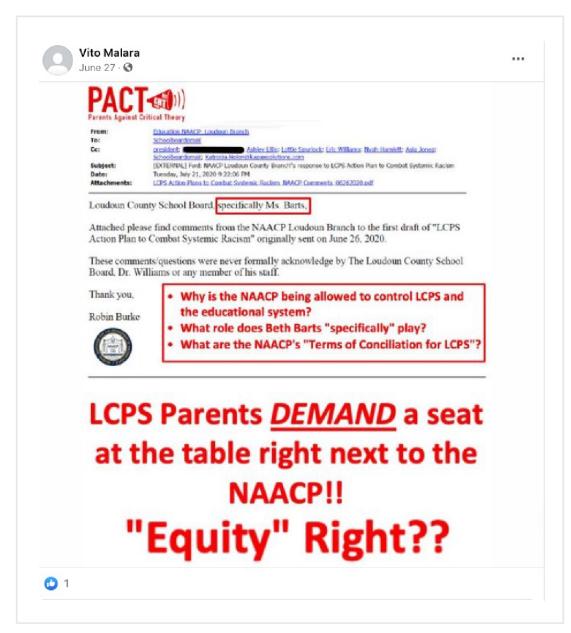


Source: Screenshots from VA Project presentation. David Gordon is in the top right, while Scott Mineo is below him (left slide).

Conclusion

While school board meetings are being pulled into the fray, it is crucial to remember there are political forces aiming to benefit from stoking division and mistrust. The groups with the most to gain have no interest in a sincere discussion about our nation's education system. From the usual Republican party operatives to fringe conspiracy peddlers, those pushing the debate around CRT the hardest are anything but "grassroots."

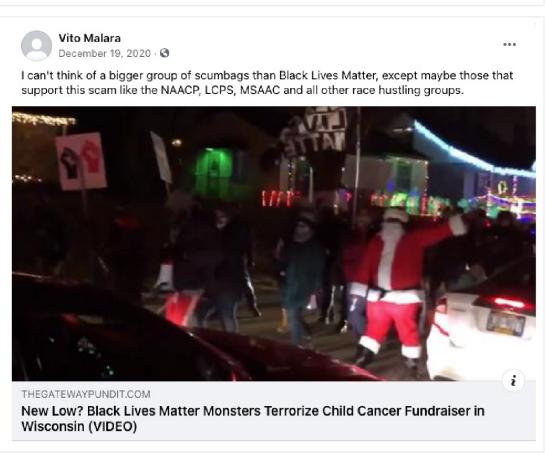
Appendix: Selected Facebook Screenshots from Scott Mineo AKA "Vito Malara"

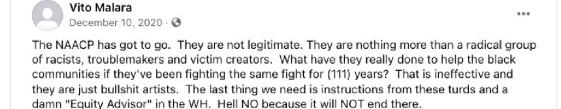




Source: Selected Facebook Screenshots from Scott Mineo AKA "Vito Malara."







Source: Selected Facebook Screenshots from Scott Mineo AKA "Vito Malara."



Now this is the "Pot Calling the Kettle Black". The NAACP has a loooong history of being racist themselves.

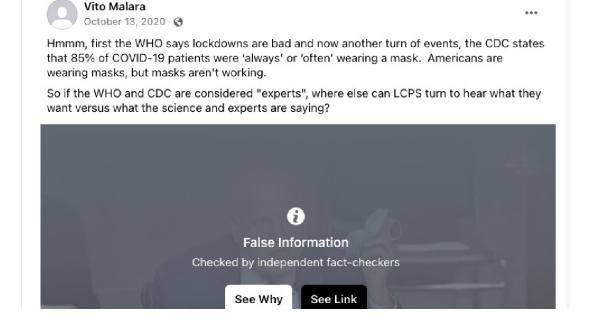
Another good example of FU whitey, "Do as I say not as I do" demand.

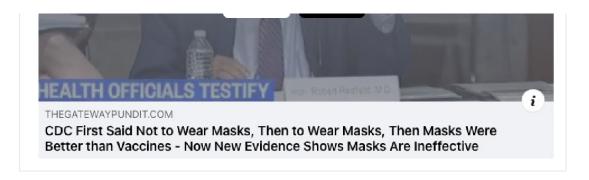
Hey NAACP, how about you figure out what your club is all about. Since the mid/late 1980's, you've wanted to be referred to as "African Americans" and not "Black", for whatever reason. In fact, many "blacks" get offended if you refer to them as "black" instead of "African American". Ok whatever. I'm confused, can you explain to me why so many blacks get angry if they are referred to as "Colored" people and yet the name of your club is "National Association for the Advancement of Colored People"? So why can't i refer to you as colored people? How about the infamous "N" word?

Since the majority of blacks seem to be offended by statues, flags, names of schools & buildings because it acts a reminder of the slavery days and how unfair blacks were treated, why be referred to as "African American"? After all, your family members were sold by BLACK slave owners in Africa to white AND black slave owners in America. Isn't the word "African" in "African American" like the ultimate reminder of slavery and oppression of blacks?

It's no wonder racial strife is at a tipping point in America, many blacks refer to each other as "nigga" and it's perfectly fine. At the same time, whites don't know how to refer to blacks, you know, with all the mixed signals the black communities send. I'm white. See how easy it is \odot







Source: Selected Facebook Screenshots from Scott Mineo AKA "Vito Malara."

ENDNOTES

- **1.** <u>Kingkade</u>, Tyler, <u>Brandy Zadrozny</u> and <u>Ben Collins</u>. "Critical Race Theory Battle Invades Schools Boards— With help From Conservative Groups." *NBC News*, 15 Jun. 2021. <u>https://www.nbcnews.com/news/us-news/critical-race-theory-invades-school-boards-help-conservative-groups-n1270794.</u> Accessed 13 Sep. 2021.
- **2.** Neily, Nicole. "Office for Civil Rights Administrative Complaint." *Parents Defending Education*, 12 May 2021. https://defendinged.org/wp-content/uploads/2021/05/Wellesley-OCR 2.pdf. Accessed 13 Sep. 2021.
- **3.** Neily, Nicole. "Office for Civil Rights Administrative Complaint." *Parents Defending Education*, 12 May 2021. https://defendinged.org/wp-content/uploads/2021/05/Wellesley-OCR_2.pdf. Accessed 13 Sep. 2021.
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- **5.** PDE claims to be seeking a 501(c)3 non-profit tax status on its website; as of this report's writing, the IRS has yet to decide to grant this status.
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- **12.** Perez, Andrew and Lee Fang. "Purdue Pharma Hired PR firm That Rebranded BP After Deepwater Horizon Spill." *The Intercept*, 19 Sep. 2019. https://theintercept.com/2019/09/19/purdue-pharma-bp-deepwater-pr/. Accessed 20 Sep. 2021.
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