



FAIR HOUSING NEWS

A newsletter about fair housing, community development, & neighborhood quality of life



2020 GREETINGS!

Welcome to this Edition of *Fair Housing News* Produced by the GBCHRB as a Public Service! To join the mailing list:

<mailto:wkladky@gbchr.org>. You can go to our website <http://www.gbchr.org> for laws,

links, etc. See our TV show on the YouTube Channel - <http://www.youtube.com/user/wkladky1>! Or, check out <http://www.gbchr.org/2rad9899.htm> for radio shows on topics about Fair Housing!

IN THIS ISSUE...

| | |
|--------------------------------|---|
| <i>National News</i> | 1 |
| <i>Maryland News</i> | 3 |
| <i>Mortgage Lending News</i> | 5 |
| <i>HUD and DOJ Enforcement</i> | 6 |
| <i>Fair Housing Resources</i> | 7 |
| <i>Have You Read?</i> | 7 |
| <i>Rest in Peace</i> | 8 |



NATIONAL NEWS

New HUD Proposal Will Weaken Fair Housing Enforcement Even More.

According to a story in the *Washington Post* on January 3, 2020, the Trump administration will propose a new rule as early as January 6th that would reduce the requirement of local governments to meet fair housing obligations.

Among the changes sought by HUD are "redefining what it means to promote fair housing, eliminating the assessment used to address barriers to racial integration, and encouraging cities to remove regulations that stand in the way of

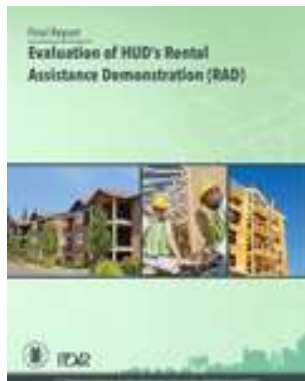
affordable housing, according to the proposed rule obtained by The Washington Post." The proposed rules are intended to increase so-called "fair housing choice" by providing more housing along with safe and sanitary housing conditions that supposedly will better allow families to live where they want — instead of racially integrating neighborhoods and communities. HUD also wants to rank communities based on housing costs and fair market rents, and then award the best performers priority status for federal housing grants. These incentives are intended to increase the availability of affordable housing. The proposed rules will be published in the Federal Register ahead of a 60-day public comment period. [Read the January 3, 2020 Washington Post article.](#)

Advocates Criticize Proposed CRA Changes as Worsening Lending Discrimination.

The organizations hold that the proposed notice of proposed rulemaking (NPRM) for changes to the Community Reinvestment Act (CRA) by the Office of the Comptroller of the Currency (OCC) and the Federal Deposit Insurance Corporation (FDIC) will make lending discrimination worse. In the statement by Jesse Van Tol, CEO of NCRC, he says: "The ratio would measure the overall value of a bank's CRA activities against the value of its deposits. This will encourage banks to seek the largest CRA financing



deals, regardless of whether the deals make the most sense for local community needs. That's why many banks as well as community-based organizations oppose the ratio being the primary determining factor on CRA exams. While the proposal looks at assessment area performance, it sets up a scenario where a bank could run up the dollar volume in 50% of its assessment areas, and still pass. The FDIC seems to have gotten a carve-out for community banks. In other words, many FDIC-regulated banks will be able to opt out of the new evaluation system and keep their CRA exams the way they are now. This further confuses the regulatory landscape, the exact opposite outcome of what new rules were supposed to achieve. "Discrimination in lending is still widespread and devastating for families and their communities. And yet 98% of banks pass their CRA exams. Taking steps to weaken the rules makes no sense. New rules should add clarity to the compliance process for banks, as well as reflect changes in how people interact with banks and how banks do business. But most critically, new rules should help low- and moderate-income borrowers in the communities that are most in need of CRA-based lending." [Read the complete December 12, 2019 NCRC press release.](#)



HUD Study Discovers Many RAD Property Tenants are not being given Choice-Mobility Options. HUD's recently released report (published in June, 2019) on the first phase of its 2012-authorized Rental Assistance Demonstration (RAD) developments found that many of the tenants in RAD properties are not being given notice of their rights to obtain a choice-mobility voucher. Read the HUD report [here](#). This is in apparent violation of one of the most innovative aspects of the Rental Assistance Demonstration, the "Choice-Mobility" requirement that gives families who are affected by a RAD public housing redevelopment the right, after the redevelopment is completed, to trade their public housing unit for a portable Housing Choice Voucher. If they choose this, their unit then becomes available for another

family on the waitlist for subsidized occupancy. The general finding of the report was that as of October 2018 more than 100,000 units of public housing were converted to the Section 8 under RAD and over \$12.6 billion was raised, with significant leverage, from various sources to improve the physical and financial condition of these properties, which would have otherwise continued to decline.

ABA Publishes a History of Efforts to End Source of Income Discrimination.

The December 20, 2019 [American Bar Association Human Rights Magazine](#) published "Your Money's No Good Here: Combating Source of Income Discrimination in Housing" written by Homeless Persons Representation Project (HPRP) Executive Director Antonia Fasanelli and [Poverty Race and Research Action Council](#) Executive Director Phil Tegeler, with a contribution by HPRP Board Member Jill Williams. As of the end of 2019, four Maryland jurisdictions - Anne Arundel County,

Baltimore City, Baltimore County, and Prince George's County passed laws this year banning housing discrimination based on source of income. These are great steps forward, but the question is: Why haven't Carroll County, Harford County, and many others taken this fair and equitable step? To read more and follow HPRP's work ending [source of income discrimination go here](#) and [to support these efforts go here](#).



New MTO Study Finds Young Children's Health Benefits from Housing Voucher Program. In a just-released analysis, a team at Johns Hopkins Bloomberg School of Public Health found evidence of moderately reduced hospital costs for children whose families had received housing vouchers in the Moving to Opportunity for Fair Housing Demonstration

Program (MTO), with additional cost savings associated with moves to lower poverty neighborhoods. Read a [summary of the research here](#) and the abstract [here](#). The MTO Program was begun in 1994 by the US Department of Housing and Urban Development (HUD), with the objective of determining the benefits of offering housing and neighborhood mobility opportunities to low-income families. The analysis was published in the *Journal of the American Medical Association (JAMA)* on December 3, 2019. It was written by [Alexandra Yurkovic, Michael Silverstein, and Alastair Bell](#). This research builds on [prior research](#) on the health benefits of housing mobility, and work by the [Poverty & Race Research Action Council's](#) own [estimates](#) of long term health system cost savings.



Study Finds About 50% of Housing Choice Voucher Holders are protected by Source of Income Discrimination Laws. A 2018 study by the Center on Budget and Policy Priorities using the data from the Poverty & Race Research Action Council (PRRAC)'s "Appendix B" survey of laws protecting Housing Choice Voucher families from discrimination - [Prohibiting Discrimination Against Renters Using Housing Vouchers Improves Results](#), by Alison Bell, Barbara Sard, and Becky Koepnick (December 2018) - found that at the time the report was released source of income discrimination laws protected 34% of US voucher holders. This study included a history of the adoption of these statutes and an interactive map that showed the geographic coverage of SOI laws. The PRRAC has just calculated that with the addition of two states since December 2018 (New York and California) and eight new municipalities that approximately 50% of voucher holders in the U.S. are now covered by these laws. See their updated survey [here](#).

The U.S. Commission on Civil Rights has released a report on federal government civil rights enforcement efforts in Fiscal Years 2016 through 2018 [Are Rights a Reality? Evaluating Federal Civil Rights Enforcement](#). The study analyzed the efforts of thirteen federal agencies and offices in enforcing federal civil rights laws regarding employment, housing, voting, education, and public accommodations. The November, 2019 statutory report found that the "extraordinary volume of complaints filed with federal civil rights agencies" indicates that civil rights protection is not the norm. The Commission urged increased staff capacity and budgets for federal agency civil rights offices as well as authority to compel noncompliant "entities within an agency's jurisdiction" to assist in investigating civil rights complaints.



MARYLAND NEWS

Maryland State House Honors Verda Freeman Welcome, A Civil Rights Fighter. Welcome becomes the first black person to have her portrait hung in a State House chamber. Her portrait (above) replaced a 115-year-old canvas of a white former governor born when slavery was legal. In 1962, Welcome was the first black woman in US elected to a state senate. Representing Baltimore, she fought for making interracial marriage legal, equal pay for woman, outlawing the harassment of welfare recipients, and forbidding racial discrimination in public places. Before her political service, Welcome had been a teacher in the Baltimore public schools for 11 years. A Democrat, she was elected to the House of Delegates in 1958. She served until she retired in 1982. [Read the January 19, 2020 Washington](#)

[Post article.](#) [Read the Maryland General Services article.](#) [Read Welcome's April 25, 1990 New York Times obituary.](#)

Anti-Redline Exhibit at the Pratt Library in Baltimore. As noted by the Archdiocese of Baltimore's [Beyond the Boundaries](#) project, there currently is a very interesting exhibit at the Pratt called "Undesign the Redline." The Pratt describes it as "a framework for unearthing our most deep, systemic and entangled crises. This interactive exhibit, workshop series and curriculum explores the history of structural racism and classism, how these designs compounded each other from 1938 Redlining maps until today, and how WE can come together to undesign these systems with intentionality." The exhibit is located in the central hall of the main Pratt 1t 400 Cathedral Street in Baltimore. Public tours of the exhibit are led by Pratt-trained staff and volunteers. The Library stresses that space is limited and registration required. For a private tour for your students, community organizations, or social groups (minimum 5, maximum 20) outside of these hours, please email pao@prattlibrary.org or call 410-396-5494. Beyond the Boundaries plans to set up a private, guided tour in January, 2020. For more information on the exhibit, as well as the Library's location and hours, please visit the Enoch Pratt website [here](#). [Available reservation dates through January 23, 2020.](#)
[Central Library, Elizabeth K. Moser Central Hall.](#)



Superseding Indictment Charges Man for Making Threats Against the Rosh Pina Messianic Congregation Synagogue in Owings Mills. A federal grand jury returned a superseding indictment charging Stephen Orback for threatening several times to attack the synagogue. Count One charges Orback with intentionally attempting to obstruct persons in the enjoyment of their free exercise of religious beliefs through the threatened use of force. Count Two charges him with making threatening interstate communications. According to the superseding indictment, in 2019 Orback made numerous telephone

calls to the synagogue employee threatening to kill members of the synagogue's congregation with firearms, by using explosives, and by burning down the synagogue. This indictment replaces one by a grand jury on Aug. 15, 2019, charging the defendant only with the interstate-threats count. An indictment is a formal accusation of criminal conduct, not evidence of guilt. The defendant is presumed innocent unless proven guilty. If convicted, Orback faces a maximum sentence of 20 years in prison, three years of supervised release, and a fine of up to \$250,000. The case is being investigated by the FBI's Baltimore Field Office and prosecuted by Assistant U.S. Attorney P. Michael Cunningham of the District of Maryland and Civil Rights Division Trial Attorney Zachary Dembo. [Read the January 16, 2020 DOJ press release.](#) [Read the January 16, 2020 Baltimore Sun article.](#)

Attorney General Brian E. Frosh (D) Joins Twenty-State Coalition Opposing Federal Efforts to Put Haitian-Born Residents at Risk of Deportation. The Attorneys General are arguing that ending Temporary Protected Status for Haitian nationals. If the administration is allowed to move forward, Haitian TPS holders in Maryland, other states, and the District of Columbia would lose their legal status, leaving them vulnerable to deportation. In an [amicus brief](#) filed in support of the plaintiffs in *Saget v. Trump* before the US Court of Appeals for the Second Circuit, the coalition argued that the administration did not have a



reasonable reason for the move, and that it violates the Administrative Procedure Act . The brief urges the Court of Appeals to affirm the lower court’s ruling and uphold a nationwide injunction against the termination to prevent widespread harm. In the brief, the attorneys general argue that the District Court’s rejection of the administration’s decision should be upheld also because separating families creates a significant economic burden for states, state economies and critical industries would suffer if Haitian residents lose TPS, and public safety would be harmed if these residents are worried about deportation. [Read the December30, 2019 press release by the Attorney General.](#)

If You Are a Homeowner in Maryland, You Better Have a Deed! Here's Where to Check for Free, and Possibly Get Tax Credits, Too. Too many Marylanders think they own their home but do not have a legal deed to the property. You need a deed or you cannot put it in your will, cannot leave the home to family, cannot qualify for rehab grants, etc. Check here if you have a deed: <http://www.myhomemydeed.org/>. On the bottom of the page, one also can check to see if you qualify for a homeowners' tax credit. The page in Spanish is: <http://www.myhomemydeed.org/my-deed-en-espanol/>. My Home, My Deed, My Legacy is a project of [Maryland Volunteer Lawyers Service \(MVLS\)](#) and [Maryland Department of Housing and Community Development](#). Renters also are possibly eligible for a tax credit, and can check at <https://dat.maryland.gov/realproperty/Pages/Renters'-Tax-Credits.aspx>.



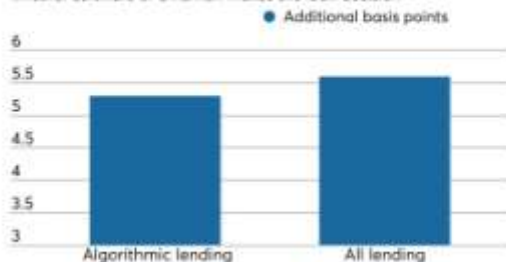
MORTGAGE LENDING NEWS

Two Blacks Audibly Record Their Racially Discriminatory Treatment by JP Morgan Employees. Despite Bank assurance that discrimination is in the past, their recordings document that employees at JPMorgan branches in the Phoenix area told one that he was essentially too black. His financial adviser complained that he, too, was a victim of racial discrimination. Among other things, one man was told that a

prospective black client was not a worthwhile client: “You’ve got somebody who’s coming from Section 8, never had a nickel to spend, and now she’s got \$400,000. What do you think’s going to happen with that money? It’s gone.” “This is not money she respects. She didn’t earn it.” A JPMorgan spokeswoman defended the bank’s overall treatment of the two men, but said that the bank had not been aware of all of the audio recordings and that “in light of some new information brought to us by the *New York Times*,” the company has put one of its executive directors on administrative leave during a bank investigation of his conduct. She did not deny that the bank had discriminated against them. [Read the December 11, 2019 New York Times article.](#)

Higher interest

Latinos and blacks pay higher mortgage interest rates, regardless of whether software or a human makes the loan decision



Source: University of California, Berkeley.

Study Finds Lenders Charge Latinx/African-American Borrowers 7.9 and 3.6 Basis Points More for Purchase and Refinance Mortgages, Costing Them \$765 Million Annually in Extra Interest. The study of 2009-2015 single-family loans conducted for the National Bureau of Economic Research - "Consumer-Lending Discrimination in the FinTech Era" by Robert Bartlett, Adair Morse, Richard Stanton, and Nancy Wallace, NBER Working Paper No. 25943, issued in June/November 2019 - also found that 0.74-1.3 million minority applications were

rejected between 2009 and 2015 due to discrimination. Using of algorithmic-informed decision-making by FinTechs failed to eliminate discrimination. The authors said this was possibly because algorithms extract rents in weaker competitive environments and/or profile borrowers on their low-shopping behavior. They did find that algorithmic lenders reduce rate disparities by over a third and have no discrimination in rejection rates. [Read the study.](#)

Consumer and Civil Rights Groups Urge Federal Banking Regulator to Stop Rent-a-Bank Payday Loan Schemes.

The groups oppose an Office of the Comptroller and Currency (OCC) proposal that would bypass state rate caps to allow high-cost predatory loans. Groups include the Center for Responsible Lending (CRL), National Consumer Law Center, Leadership Conference on Civil and Human Rights, NAACP, and other organizations. They argue that the proposed rule would encourage rent-a-bank schemes that allow loans of 100% APR or higher in states that outlaw high-cost loans and mortgages up to 138% that will drive small business owners into foreclosure. The groups argued that the proposal also could make it easier for non-bank lenders to launder money through banks and unleash a flood of predatory loans, and that the OCC did not adhere to the requirements of the 2010 Dodd-Frank Act before preempting state law. The comment also notes that the OCC fails to consider the risks the proposal poses to the safety and soundness of national banks, and that the OCC fails to consider the proposal's impact on market participants that comply with state law. [Read the January 22, 2020 CRL article.](#)



HUD & DOJ ENFORCEMENT

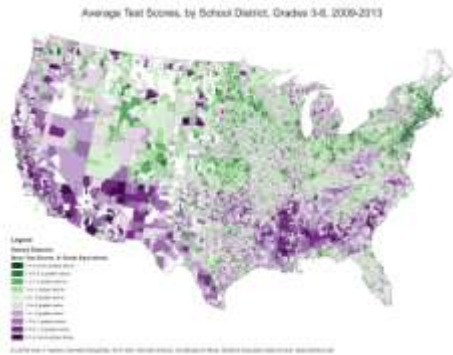
HUD Issues Guidance On Reasonable Accommodations under the Fair Housing Act Relating to Assistance Animals. This new Assistance Animal Notice will help housing providers in this process by offering a step-by-step set of best practices for complying with the Act when assessing accommodation requests involving animals and information that a person may need to provide about his or her disability-related need for the requested accommodation, including supporting information from a health

care professional. [Read the Notice.](#) this new Assistance Animal Notice provides information on the types of animals that typically may be appropriate and best practices for when the requested animal is one that is not traditionally kept in the home. It provides information for both housing providers and persons with disabilities regarding the reliability of documentation of a disability or disability-related need for an animal that is obtained from third parties, including internet-based services offering animal certifications or registrations for purchase. [Read the January 28, 2020 HUD press release.](#)

Justice Department Settles Sexual Harassment Lawsuit Against Owners and Manager of Kansas Rental Properties.

The owners and managers will pay \$160,000 in damages and civil penalties to resolve a Fair Housing Act lawsuit alleging that he sexually harassed numerous female tenants since at least 2009 at residential properties in Wichita, Kansas. The payment includes \$155,000 in monetary damages to eleven former tenants who were harmed as a result of the harassment, and a \$5,000 civil penalty. The consent order also forbids the defendants from future participation in the rental or management of residential properties. [Read the January 17, 2020 HUD press release.](#)





FAIR HOUSING RESOURCES

New Website Tool Shows the Impacts of School Segregation by School District. The Educational Opportunity Project at Stanford University's [interactive website](#) describes access to educational opportunity for every US school district, including a [series of tables](#) on the persistent effects of racial and economic segregation on student achievement. The research papers covered of the website are also collected [here](#). The Project utilizes the Stanford Education Data Archive (SEDA) with

detailed data on educational conditions, contexts, and outcomes in US school districts and counties. SEDA includes measures of academic achievement and achievement gaps for school districts and counties, as well as district-level measures of racial and socioeconomic composition, racial and socioeconomic segregation patterns.

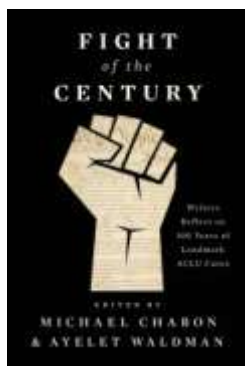
Interested In Fair Housing? Community Development? Insurance? Foreclosure Prevention? Check Out the [GBCHRB's YouTube Channel](#)! You can watch interviews about insurance, discrimination, affordable housing, Fair Housing laws, disability issues, mortgage lending, and related issues. Our radio shows: <http://www.gbchr.org/2rad9899.htm>.



The GBCHRB Distributes Free Fair Housing Brochures, Posters, and Guides.

We have Fair Housing information, brochures, guides, & posters in English, Spanish, Korean, Russian, and for people with disabilities. We also distribute brochures and guides about housing and insurance. 410.929.7640 / <mailto:wkladky@gbchr.org>.

What Do You Think of This Newsletter? Is it good? Bad? How can we improve it? What issues should we cover more? Less? Any good ideas? Tips? Good jokes?! Positive or negative, we want to hear from you! We appreciate constructive criticism! Send comments to <mailto:wkladky@gbchr.org>.

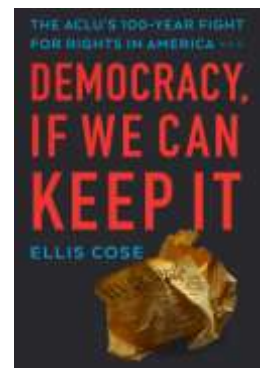


HAVE YOU READ?

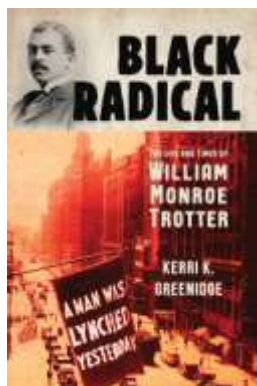
To mark its 100-year anniversary, the American Civil Liberties Union is publishing these two histories. Both are well worth reading. *Fight of the Century: Writers Reflect on 100 Years of Landmark ACLU Cases* was curated in cooperation with the ACLU by authors Michael Chabon and Ayelet Waldman. It is an anthology of essays about important cases in the organization's history that includes prominent cases like *Brown v. Board of Education*, *Roe v. Wade* and *Miranda v. Arizona*, as well as others whose outcomes influenced the

law and living. For example, Hector Tobar discusses Ernesto Miranda, the felon whose wrongful conviction inspired the Miranda rights. There also are essays from Neil Gaiman, Salman Rushdie, Ann Patchett, Louise Erdrich, and others. Chabon and Waldman are donating their advance to the ACLU and the contributors are forgoing payment.

Democracy, If We Can Keep It: The ACLU's 100-Year Fight for Rights in America is a history of the ACLU by the nationally celebrated journalist, bestselling author (*The Rage of a Privileged Class*, *The End of Anger*), and the



ACLU's first official writer-in-residence. The book tells the story of the ACLU as well as the fight for rights that were legal but not enjoyed by all. It chronicles the ACLU's involvement in work around World War I, the Red Scare, the Scottsboro Boys' trials, Japanese American internment, McCarthyism, Vietnam, 9/11, Edward Snowden, and the current American President.



Black Radical: The Life and Times of William Monroe Trotter by Kerri K. Greenidge. Liveright, 2019. 432 pages. \$35.00 hardcover. Interesting biography of William Monroe Trotter (1872-1934) who founded the Boston-based black weekly newspaper *The Guardian* in the early 20th century. Instead of the accommodationist racial policies of Booker T. Washington, Trotter advocated a radical vision of black liberation. The first man of color to earn a Phi Beta Kappa key at Harvard University, he also was active in protest movements for civil rights during the 1900s and 1910s. During a 1914 meeting with President Woodrow Wilson, he protested Wilson's introduction of racial segregation into the federal workplace. He co-founded with W. E. B. Du Bois the Niagara Movement in 1905, a forerunner of the National Association for the

Advancement of Colored People (NAACP).

Just Mercy: A Story of Justice and Redemption by Bryan Stevenson. Spiegel & Grau, 2015. 368 pages. \$17.00 paperback. This highly praised reprinted book recently was featured in the HBO documentary "True Justice," and is being made into a film starring Michael B. Jordan and Jamie Foxx. It is, as the Amazon blurb states: "Just Mercy is at once an unforgettable account of an idealistic, gifted young lawyer's coming of age, a moving window into the lives of those he has defended, and an inspiring argument for compassion in the pursuit of true justice." The book also is a winner of the NAACP Image Award for Nonfiction. Stevenson is the executive director of the Equal Justice Initiative in Montgomery, Alabama, and a professor of law at New York University Law School. He has cases for many condemned prisoners, argued five times before the US Supreme Court, and won praise for his work fighting bias against the poor and people of color.



REST IN PEACE

Dorothy Brown Bascom, Community Leader & Civil Rights Worker, 91.

The wife of the noted civil rights leader Rev. Marion C. Bascom, Bascom was a teacher, school principal, civil rights worker, and business owner. Believing that everyone could succeed, she was praised for her outstanding teaching ability while teaching at seven schools for forty years. As her daughter remarked, she was a "quiet

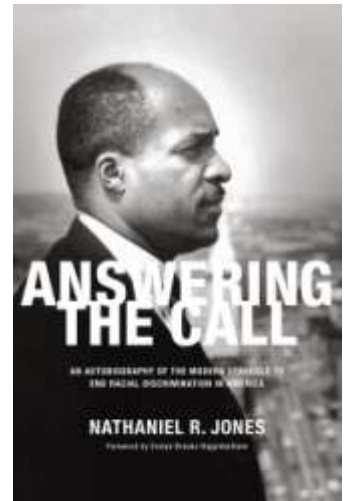
warrior" in the civil rights movement. She provided hospitality in hosting civil rights marchers as they traveled through Baltimore to Washington, D.C. Bascom also participated in the August 28, 1963, March on Washington and the 1973 March on Washington. She was treasured for serving her great home-cooked meals for Douglas Memorial Community Church parishioners and Baltimore City officials, as well as members of the Goon Squad, who were Maryland civil rights activists. Bascom also was a member of the W.E.B. DuBois Circle of black women in Baltimore City. The family has created this Life Tribute page to share memories: <https://www.marchfh.com/obituaries/Dorothy-Bascom/>. [Read the November 6, 2019 obituary in the *Baltimore Sun*.](#)



J. Charles Jones, Civil Rights Activist, 82. A lawyer, Jones led the early 1960s multiple lunch-counter sit-ins and voter-registration drives in Georgia and Mississippi, and protested discriminatory housing practices near military bases around Washington, DC and suburban Maryland and Virginia. A founding member of the Student Nonviolent Coordinating Committee, Jones organized some of the first lunch-counter sit-ins in Charlotte, North Carolina, and was one of the Freedom Riders, a group that protested racial segregation on Southern interstate buses. As the president of

ACCESS - the Action Coordinating Committee to End Segregation in the Suburbs - Jones identified many apartment buildings and housing developments that forbade black residents even if they were in the military. In 1966, Jones walked the entire Capital Beltway carrying the sign "End Apartment Segregation." In 1967, US Secretary of Defense Robert S. McNamara's order prohibited military personnel from living in segregated housing within three miles of Maryland's Andrews Air Force Base. Jones was arrested multiple times at demonstrations, including twice with the Rev. Martin Luther King Jr.

Nathaniel Jones, Civil Rights Lawyer and Appeals Judge, 93. As the chief lawyer for the NAACP from 1969 until his appointment to the federal appeals court, Jones argued for the organization in school desegregation suits filed against public school districts in Cleveland, Dayton, Columbus, Boston, Atlanta, San Francisco, and Los Angeles. He served as the first African American AUSA in the Northern District of Ohio, led the civil rights litigation efforts of the NAACP during the 1970s, and served on the Sixth Circuit for over twenty years. In 2003, the US Congress passed H.J.Res.2, officially naming the Nathaniel R. Jones Federal Building & US Courthouse in Youngstown, Ohio. He was the 101st recipient of the NAACP's Spingarn Medal in 2016. He taught at several US law schools and held 19 honorary degrees. Jones was consulted by the drafters of South Africa's new constitution and laws, and he met with Nelson Mandela upon Mandela's prison release after 27 years in 1990. [Read the NAACP obituary.](#) [Read the January 26, 2020 AP obituary.](#) [Read the Blank Rome statement.](#)



Edna Smith Primus, Pioneering Civil Rights Lawyer, 75. Primus was the first black women to practice law in South Carolina and was a lawyer with the ACLU in the 1970s. She won the US Supreme Court case that widened free speech rights for attorneys at nonprofit organizations. The court declared a lawyer could recruit clients when this concerned political expression and advocating for public rights. This ruling helped lead to rules that attorneys working with nonprofits have wider constitutional protections than those motivated by financial

gain. Primus was praised by a colleague at Palmetto Legal Services (Spartanburg, South Carolina): "Edna always demonstrated a quiet but serious commitment to the agency's central mission; that is, delivering quality legal services to those citizens who otherwise could not afford them." [Read the December 6th The Post and Courier \(Charleston, South Carolina\) obituary.](#) [Read an academic article about sterilization in South Carolina.](#)
