EXHIBIT E

AFL RELEASES DOCUMENTS CONCLUSIVELY PROVING CRITICAL RACE THEORY INDOCTRINATION IS BEING USED IN PUBLIC SCHOOLS

MONDAY, JUNE 13, 2022

WASHINGTON– Today, America First Legal released 166 pages of documents proving that school district bureaucrats and a cadre of taxpayer-funded "consultants" are using Critical Race Theory to "transform" public education and indoctrinate American children.

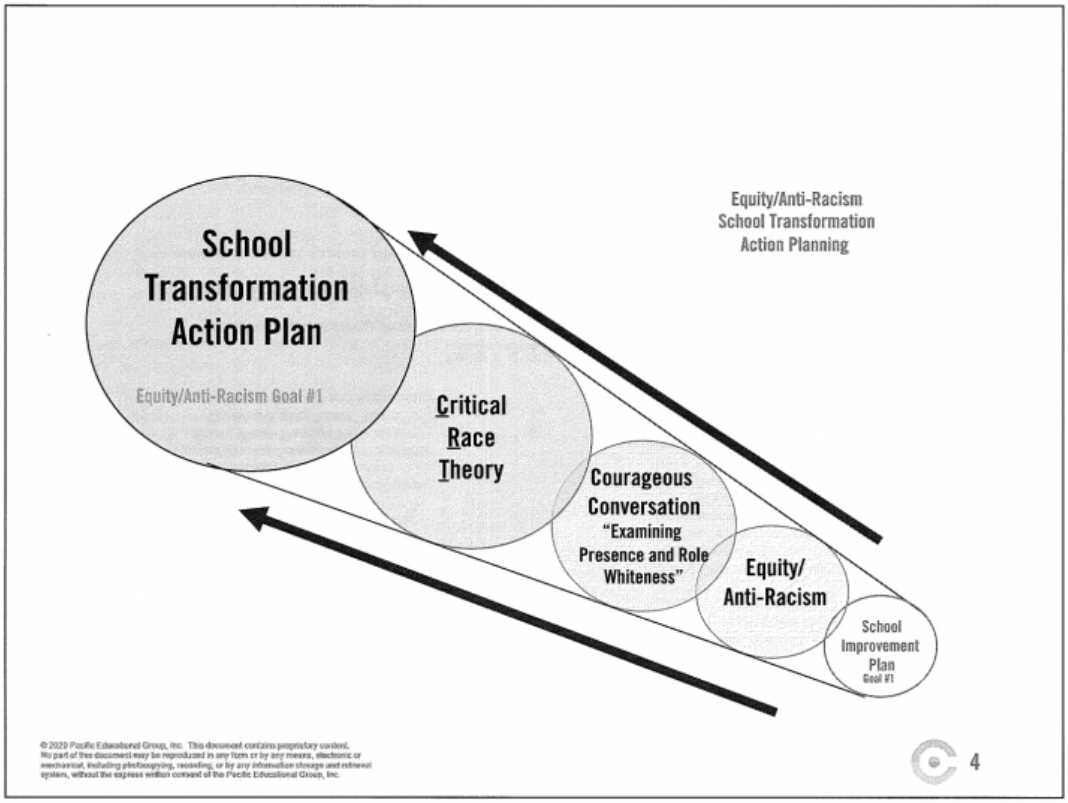
America First Legal, working with Wally Zimolong of Zimolong LLC, sued the Tredyffrin/Easttown School District in Chester County, PA on behalf of Ben Auslander, a father who exercised his right to review the materials that the District was using to "educate" children in the District. The District had hired the Pacific Educational Group (PEG), a California-based education consultant that claims "Systemic Racism is the most devastating factor contributing to the diminished capacity of all children" to run teacher training and shape the curriculum.

But when the time came for Mr. Auslander to see what the District and PEG were up to, the District told him he could not make notes, photocopy, or take pictures of PEG's presentations. Mr. Auslander tried to take voice notes on his phone, but to hide the truth, the District terminated the

inspection and threw him out, claiming that PEG had asserted copyright protections on its training materials.

Then, AFL sued the District on behalf of Mr. Auslander.

Unwilling to advance its baseless copyright protection claim in federal court, PEG caved and the documents were produced to America First Legal. They show that PEG's "training" of the District staff included exercises on "walking through the barriers to teaching Critical Race Theory at your school," and how "Critical Race Theory is a vital step in your School Transformation Action Plan.'"


School Transformation Action Plan
Equity/Anti-Racism Goal #1
Critical Race Theory
Courageous Conversation "Examining Presence and Role Whiteness"
Equity/ Anti-Racism
School Improvement Plan Goal #1
Equity/Anti-Racism School Transformation Action Planning
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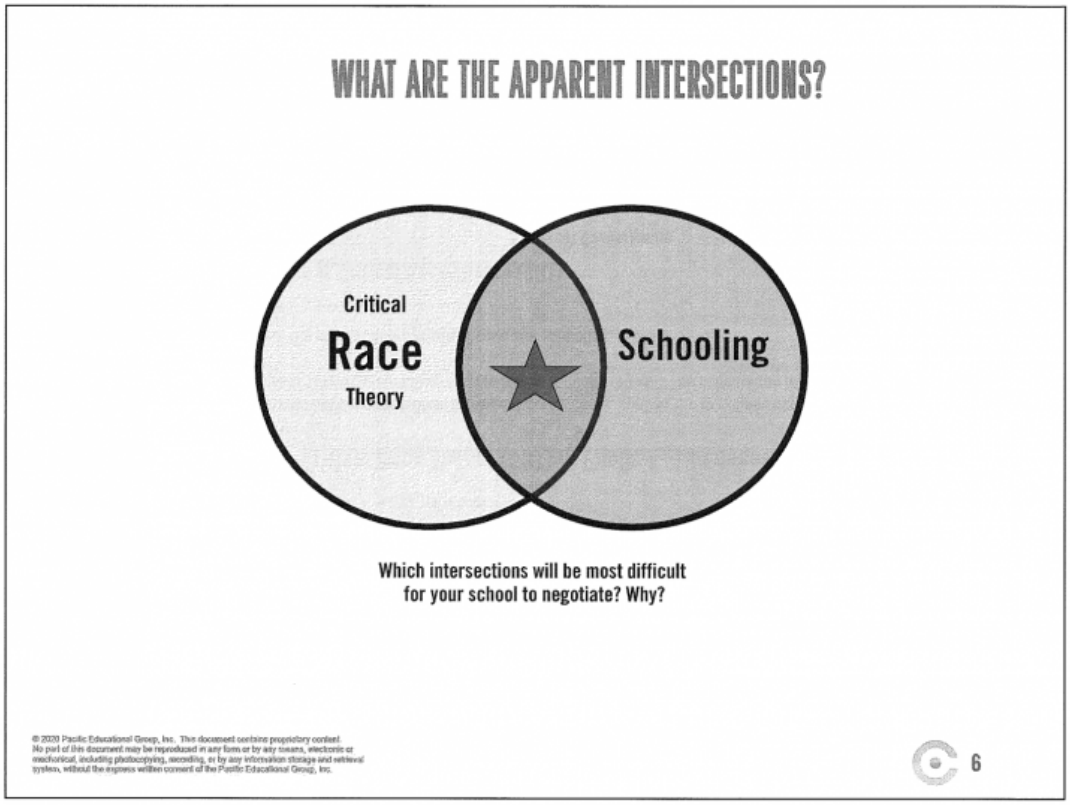
WHAT ARE THE APPARENT INTERSECTIONS?
Critical Race Theory
Schooling
Which intersections will be most difficult for your school to negotiate? Why?
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WHAT IS WHITENESS?

"The virtual invisibility that whiteness affords those of us who have it, is like psychological money in the bank, the proceeds of which we cash in every day while others are in a state of perpetual overdraft."

Tim Wise, "Membership Has Its Privileges"
Rethinking Schools, Summer 2002

COLOR — Primary, Presence, Positioning
"White Privilege"
Stages of Avoidance: Ignorance to Competing Victimization

CULTURE — Being, Feeling and Acting White
"White Racial Bonding"
Avoidance | Individualism | Universality | De-Contextualization

CONSCIOUSNESS — Thinking and Reasoning White
"White Racial Identity Development"
Color-Blindness | Guilt/Shame | Anger | Helplessness | Anti-Racist

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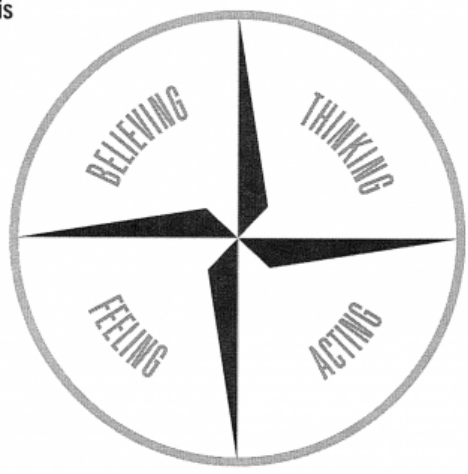
HOW DO WE AS AN E-TEAM "ROLL OUT" THIS WORK WITHIN OUR SCHOOL/DEPARTMENT?

- Based on your current understanding of this work, as you think about rolling out this work who and what comes to mind?

COURAGEOUS CONVERSATION COMPASS



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WHAT DOES IT MEAN TO BE WHITE?

Dr. Robin DiAngelo
Author of What Does it Mean to be White?: Developing White Racial Literacy

I have spent years studying what it means to be white in a society that proclaims race meaningless, yet is deeply divided by race. This is what I have learned: ANY White person living in the United States will develop opinions about race simply by swimming in the water of our culture.

SEGREGATION Most whites live, grow, play, learn, love, work and die primarily in racial segregation. Yet, our society does not teach us to see this as a loss.

INDIVIDUALISM Whites are taught to see themselves as individuals, rather than as part of a racial group. It follows that whites are racially objective and thus can represent the universal human experience, while people of color can only represent their race.

FOCUS ON INTENTIONS OVER IMPACT We are taught that racism must be intentional and that only bad people commit it. Thus a common white reasoning in cross-racial conflicts is that as long as we are good people and don't intend to perpetuate racism, then our actions don't count as racism.

WHITE FRAGILITY In a white-dominant society, challenges to a white worldview are uncommon. The racial status quo is comfortable for us. We haven't had to develop the skills, perspectives or humility that would help us engage constructively. As a result, we have very little tolerance for racial discomfort and respond poorly.

SOURCE: ADAPTED FROM *WHAT DOES IT MEAN TO BE WHITE?* BY ROBIN DIANGELO, SEATTLE TIMES, 8/11/14

UNDERSTANDING WHITENESS IN A WHITE CONTEXT

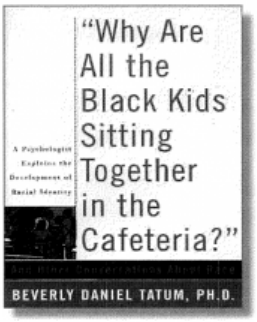
FROM "WHY ARE ALL THE BLACK KIDS SITTING TOGETHER IN THE CAFETERIA?"

HELMS' MODEL OF WHITE IDENTITY:

1. contact – Whites pay little attention to the significance of their racial identity – "I'm just normal." Perceive themselves as color-blind and completely free of prejudice

2. disintegration – growing awareness of racism and White privilege as a result of personal encounters. This new awareness is characterized by discomfort

3. reintegration – feelings of guilt or denial may be transformed into fear and anger directed towards people of color. May be frustrated if seen as a group rather than individuals



4. *pseudo-independent* – the individual gains an intellectual understanding of racism as a system of advantage, but doesn't quite know what to do about it

5. *immersion/emersion* – marked by a recognized need to find more positive self-definition. Whites need to seek new ways of thinking about Whiteness, ways that take them beyond the role of victimizer

6. *autonomy* - represents the culmination of the White racial development process. A person incorporates the newly defined view of Whiteness as part of a personal identity. The process is marked by an increased effectiveness in multiracial settings

1. WHERE AM I?

2. WHERE ARE MY "WHITE" COLLEAGUES?

RUGGED INDIVIDUALISM
- Self-reliance
- Individual is primary unit
- Independence and autonomy highly valued and rewarded
- **Individuals assumed to be in control of their environment – "You get what you deserve"**

COMPETITION
- Be #1
- Win at all costs
- Winner-loser dichotomy
- Action Orientation
- Master and control nature
- Must always "do something" about a situation
- Aggressiveness and Extroversion
- Decision-Making
- Majority rules (when Whites have power)
- Hierarchical

JUSTICE
- Based on English common law
- **Protect property and entitlements**
- Intent counts

COMMUNICATION
- "The King's English" rules
- Written tradition
- Avoid conflict, intimacy
- Don't show emotion
- Don't discuss personal life
- Be polite

HOLIDAYS
- Based on Christian religions
- Based on white history and male leaders

HISTORY
- Based on Northern European immigrants' experience in the United States
- Heavy focus on the British Empire
- Primacy of Western (Greek, Roman) and Judeo – Christian tradition

PROTESTANT WORK ETHIC
- Hard work is the key to success
- Work before play
- "If you didn't meet your goals, you didn't work hard enough"

EMPHASIS ON SCIENTIFIC METHOD
- Objective, rational linear thinking
- Cause and effect relationships
- Quantitative emphasis

STATUS, POWER AND AUTHORITY
- Wealth = worth
- **Heavy value on ownership of goods, space, property**
- Your job is how you are
- Respect authority

TIME
- Adherence to rigid time schedules
- Time viewed as a commodity

FUTURE ORIENTATION
- Plan for future
- Delayed gratification
- Progress is always best
- "Tomorrow will be better"

FAMILY STRUCTURE
- Nuclear family (father, mother, 2.3 children is the ideal social unit
- Husband is breadwinner and head of household
- Wife is homemaker and subordinate to husband
- Children should have own rooms, be independent

AESTHETICS
- Based on European culture
- Woman's beauty based on blonde, thin – "Barbie"
- Man's attractiveness based on economic status, power, intellect
- Steak and potatoes; "bland is best"

RELIGION
- Christianity is the norm
- Anything other than Judeo – Christian tradition is foreign
- No tolerance for deviation from single god concept

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Critical Race Theory (CRT)

What, When, Why?

CRT Theme	Theoretically What does the tenet mean in layman's terms?	Personally Condition #1: CRT In My life?	Professionally/ Organizationally Application of the tenet by leaders
a) Counter-Storytelling			
b) The Permanence of Racism			

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Leftist teacher unions, education bureaucrats, and media officials have promised the American people that "CRT is not being taught in any single K-12 school in America." But America First Legal has uncovered the truth and exposed their lies. Parents across the Nation should read the documents, and demand that their local school districts tell the truth about the role CRT and other woke ideology plays in teacher training, curriculum development, and, ultimately, student indoctrination.

And as well-documented by the outstanding work of Parents Defending Education, PEG is working with school districts in states all across the country to disseminate this toxic ideology.

America First Legal will continue to stand with patriotic American parents to protect our children.

Statement from America First Legal President, Stephen Miller:

"This should forever end all debate. Our innocent children are being viciously indoctrinated with CRT by marxist radicals. This lawless, extremist, poisonous bigotry must be defeated."

Statement from America First Legal Vice-President and General Counsel, Gene Hamilton:

"These documents establish–once and for all–that CRT is present in public schools across the country. And not only is it present, but it is being funded by taxpayers across this country with hundreds of thousands of dollars being spent in each individual school district. The American people do not want their money being spent on these toxic training materials under any circumstance, but especially not while their children attend classes that are overcrowded, their teachers are underpaid, and in school buildings that are in need of repair. Ever dollar spent on this nonsense is a dollar wasted."

Statement From America First Legal Senior Advisor Ian Prior:

"Pacific Educational Group is one of the largest 'equity consultants' in the United States and these documents make it crystal clear that critical race theory training is absolutely being paid for by taxpayer money to transform our public school systems. Consultants like the Pacific Educational Group can dress up their work as 'culturally responsive training' or 'equity training,' but it does not change the fact that what they are actually implementing is one thing and one thing alone – critical race theory."

Twitter, Facebook, GETTR, Parler

Read all of the documents here.

To schedule an engagement with America First Legal, please email info@athospr.com.

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