

August 14, 2020

**BY ECF**

Honorable Katherine Polk Failla  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *Uniformed Fire Officers Ass'n, et al. v. de Blasio, et al.*, 20 Civ. 5441 (KPF)

Dear Judge Failla:

We write on behalf of the organizations Girls for Gender Equity, Inc. (“Girls for Gender Equity”) and Transgender Law Center (collectively, “*Amici*”) to respectfully request the Court’s permission to file an *amicus* brief in the above-captioned case in opposition to Petitioners/Plaintiffs’ motion for a preliminary injunction. *See City of New York v. United States*, 971 F. Supp. 789, 791 n.3 (S.D.N.Y. 1997) (“A district court has broad discretion in deciding whether to accept an *amicus* brief.”), *aff’d*, 179 F.3d 29 (2d Cir. 1999). Counsel for Petitioners/Plaintiffs and counsel for Respondents/Defendants have stated that they take no position. The proposed *amicus* brief is attached as Exhibit A.

Girls for Gender Equity aims to support and uplift the voices of cisgender and transgender girls and young women of color, who face disturbing patterns of policing, interpersonal violence, and institutional violence in their schools and communities. Girls for Gender Equity works to disrupt school-to-prison and sexual-assault-to-prison pipelines through participatory action research, coalition building with dedicated allies, and listening to and supporting youth as they hone their own organizing and self-advocacy skills.

Transgender Law Center (“TLC”) is the largest national trans-led organization advocating self-determination for all people. Grounded in legal expertise and committed to racial justice, TLC employs a variety of community-driven strategies to keep transgender and gender nonconforming (“TGNC”) people alive, thriving, and fighting for liberation. TLC builds power within TGNC communities, particularly communities of color and those most marginalized, and lays the groundwork for a society in which all people can live safely, freely, and authentically regardless of gender identity or expression. TLC also effects its mission through impactful litigation, policy advocacy, educational efforts, movement building, and the creation of model programs, including around issues of profiling, targeting, and abuse of transgender and gender nonconforming people by law enforcement.

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The proposed *Amici* are well-suited to offer the Court “unique information or perspective[s] that can help the court beyond the help that the lawyers for the parties are able to provide.” *Auto. Club of N.Y., Inc. v. Port Auth. Of N.Y. & N.J.*, 2011 WL 5865296, at \*2 (S.D.N.Y. Nov. 22, 2011) (noting that “[a]n *amicus* brief should normally be allowed” in this situation, among others). In particular, the proposed *amicus* brief will provide the Court with information distinct from that submitted by the parties by focusing on the intersection of gender and sexual identity with police misconduct. Access to the complete disciplinary records of law enforcement officers, including those at issue in this case, will greatly aid *Amici* in their missions to provide tools for recourse for survivors who have experienced police harassment and abuse, particularly for transgender girls of color.

We respectfully submit that this information should be considered by the Court in evaluating Plaintiffs’ motion, the balance of harms, and the public interests at stake, including the rights and interests of the countless individuals Girls for Gender Equity and Transgender Law Center support and represent.

For the foregoing reasons, we respectfully request leave from the Court to file the proposed *amicus* brief.

Respectfully submitted,

/s/ Joel M. Cohen

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