



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
Washington, D.C. 20507

Office of
General Counsel

January 13, 2016

Mr. John Ley, Clerk of the Court
U.S. Court of Appeals, Eleventh Circuit
Elbert Parr Tuttle Court of Appeals Building
56 Forsyth Street, N.W.
Atlanta, GA 30303

Re: *EEOC v. Catastrophe Management Solutions*,
No. 14-13482 (11th Cir.)

Dear Mr. Ley:

Please accept for filing in the above-captioned case this letter on behalf of the Equal Employment Opportunity Commission ("EEOC" or "Commission"), plaintiff-appellant, pursuant to Fed. R. App. P. 28(j).

On December 14, 2015, the Marine Corps decided to change its ban on dreadlocks and other natural hairstyles worn by Black women in its service. The new rules set forth standards that permit the styles so long as they are "neat."

<http://madamenoire.com/604410/two-strand-twists-and-thin-locks-are-now-approved/>.¹

This submission is an update to information in the Commission's opening brief regarding similar policy changes by the Army, Navy and Air Force in response to outcries that the prohibition of the wearing of dreadlocks, cornrows and twists by military women constituted race discrimination against Black women. EEOC Br. at 27-28.

In making this regulatory change, the military, which is known for its strict uniform standards governing appearance, has recognized the need for the acceptance of natural hairstyles such as dreadlocks so long as they are neat in appearance. This latest ruling by the Marines recognizes the principle and supports the EEOC's argument on page 31 of its opening brief, that "the people most adversely and significantly affected by a dreadlocks ban . . . are African Americans." The ruling also supports the Commission's

¹ The article has not been attached because it fails to print in entirety from the webpage.

position that a dreadlocks ban represents a racial stereotype regarding natural Black hair that serves as an impermissible impediment to job opportunities for Black people, especially in this case where Ms. Chastity Jones' locks were not "messy," by CMS's own admission. *See* EEOC Br. at 5, 33.

Sincerely,



s/PAULA R. BRUNER

Attorney

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