

Courtney Bullar...: Welcome to the Law and Education Podcast, and part two of my conversation with Nancy Hogshead-Makar. Again, my name is Courtney Bullard, and I am your host. If you are tuning in for the first time, be sure to listen to episode one for more information about ICS and me, and to tune in to the first part of my conversation with Nancy, where I outline her very impressive background. I'm going to lay the foundation for what is happening with respect to transgender rights under Title IX, before turning to my conversation with Nancy. Shameless plug, but in community access under Title IX University, we have a lot of specialty courses and we're adding one on discrimination based on sexual orientation and gender identity under Title IX and beyond, because this is such an important topic and a lot is happening fast in this space.

As of the date of this episode, here's a quick rundown of all that's going on. This past year inclusion of transgender athletes and athletic programs was heavily debated at the federal and state level. In June, of 2021, the department of education expanded Title IX to prohibit discrimination based on one's gender identity and sexual orientation. Some background there with respect to sub-regulatory guidance in this area. Since 2016 the department of education has issued multiple guidance documents addressing whether Title IX applies to sexual orientation and gender identity, or SOGI.

Under the Obama administration OCR issued a 2016 Dear Colleague Letter that made clear its position that Title IX includes SOGI. Early in the Trump administration, OCR reversed its position in a 2017 Dear Colleague Letter withdrawing the earlier guidance. Four years later in light of the Supreme Court decision in Bostock that I'm going to cover in a moment, OCR issued a January 2021 memo during the last years of the Trump administration, stating that sex under Title IX means biological sex. The Biden administration upon taking office quickly reverted back to the 2016 position. Citing Bostock, president Biden on his first day in office issued an executive order stating discrimination based on SOGI was included under Title IX.

In March, of 2021, the department of justice issued a memo consistent with that position, and OCR published a public notice in June, of 2021, stating that it would fully enforce Title IX to prohibit discrimination based on SOGI in education programs or activities. Backing up a quick reminder that part of the assessment of whether discrimination for being transgender is sex discrimination under Title IX includes Title VII's language and precedent. Both statutes, Title VII and Title IX focus on discrimination against individuals. And although they are separate statutes, as you heard me review in my podcast with Celeste Bradley, we do have two circuits that have held that the court should look to Title VII to interpret Title IX.

We also have the Bostock decision in the summer of 2020, which is a Supreme Court decision where the court held that Title VII's prohibition against sex discrimination, prohibits discharging an employee because of their sexual orientation or gender identity. The court made clear, however, that there were

limitations to applications of its analysis under Title VII stating they did not purport to address bathrooms, locker rooms or anything else with respect to access. In other words, the analysis was solely related to termination based on SOGI. *Grim v. Gloster County School Board*, a case involving facility access reflects a lot of the shifting administrative and judicial interpretation impacting transgender student rights. So it's worth briefly going over.

While many of these issues with facility access are seen at the school district level, it's also important for our folks in higher ed to understand the landscape as those students are matriculating to your institutions. A very general overview, Gavin Grim, a female to male transgender student brought a Title IX action in 2015, alleging his high school denied him access to the bathroom that corresponded to his gender identity. After several years of litigation, the Supreme Court agreed to review the case, but then vacated what's called a writ of cert and remanded the case in light of Trump's 2017 guidance. The trial court then concluded that the policy discriminated against transgender students on the basis of gender nonconformity. On appeal the fourth circuit affirmed the district court. Note, this occurred after the *Bostock* decision, thereafter the school district filed a petition for a writ of cert to the US Supreme Court for it to review.

It was predicted the court would grant it again in light of *Bostock*, however the court denied the petition. Turning to transgender participation in athletics on the state level 27 states have introduced bills restricting transgender athletes from participating in school sports by limiting athletes play on teams that correspond with one's biological sex. As of November, of 2021, nine of those have been made into law. At the collegiate level University of Pennsylvania's breakout swimmer Leah Thomas, a male to female student athlete has also stimulated the debate with universities and NCAA surrounding transgender student athletes. And you'll hear me talk more about that at the end of this very long introduction. In this social and political landscape, collegiate athletic programs have called on the NCAA to provide formal guidance on the issue. It's important to discuss what happened just a few weeks ago at the NCAA convention, before I turn back to some recent developments with respect to Leah Thomas.

At the NCAA convention, the board of governors published its updated transgender participation policy. Under this update, the NCAA will mirror the international Olympic and Paralympic committees policies and will defer to each individual sport to determine whether an athlete is at a disproportionate advantage against their peers, given the nature of each sport. If the sport has a national governing body, that body determines the guidelines for transgender athletes. If however, the sport does not have a national governing body, that sport's international federation policy should be followed. In the event the sport does not have an international federation, the latest IOC policy is going to be followed. The IOC's 2021 policy on fairness and non-discrimination follows the sport by sport policy and adds that an athlete may be evaluated to determine

any competitive advantage. However, no athletes should be targeted for testing because of, or aimed at determining their sex, gender identity and, or sex variations.

The NCAA also provided updated guidelines regarding hormone replacement therapy for transgender student athletes. Starting in the winter of 2022 champion season, transgender student athletes must document sport specific testosterone levels four weeks before championships. In the 2022/23 academic year, transgender student athletes must provide documentation of testosterone levels at the start of this season, six months after, and four weeks before the championship. This would replace the NCAA's 2011 policy that required transgender women, male to female, to have at least a year of testosterone suppressants to compete.

According to the NCAA, about 80% of US Olympians are current or former collegiate athletes, therefore aligning the NCAA and the IOC is aimed at standardizing conduct between the organizations and providing consistency for student athletes. As you're going to hear, Nancy has a lot of direct knowledge about what is happening with the IOC. And she also has been directly involved in what has been happening with regard to Leah Thomas's participation at the collegiate level. All of this happened a few days before this episode was scheduled to air. The NCAA's new policies that I went over with you could potentially block swimmer Leah Thomas from competing in March's NCAA championships.

Nancy Hogshead-...: We've done a lot of work to make it really safe for people who are gay and lesbian, to be able to participate in sports and to be celebrated for who it is that they are. We want to do the same thing for transgender athletes. And we also want the standard for competing in the girls and women's category to be flexible based on, number one, the sport, but also the science is changing all the time.

Courtney Bullar...: Nancy wrote a letter on behalf of 16 members of the university of Pennsylvania swim team, and it was sent to the Ivy League and the university asking that they not pursue legal action to challenge the NCAA's new transgender athlete participation policies. The letter essentially states that they feel that Leah holds an unfair advantage over competition. The identities of the teammates were not revealed. That letter came after multiple members of the U Penn swim and diving team voiced their support of Thomas, stating that they wanted to express their full support of Leah in her transition. U Penn is next scheduled to compete February 16th through 19th at the Ivy League Championships at Harvard. And Thomas is qualified for the NCAA championships, which are scheduled for March 16th through the 19th. Much to watch here, but at the end of the day it reflects what we're seeing in this space with transgender participation in athletics.

And as I say in my conversation with Nancy, there's the full inclusion viewpoint, full exclusion viewpoint, and everything in between. Nancy shares the work that her organization is doing and their position on this issue, again, which is reflected in that letter that she pinned. And I just encourage all of you to listen and learn as I'm learning so much about this space. Wherever you fall on this issue, there is much to be learned and educated on, and I find myself reading as much as I possibly can to make sure that I'm fully informed on all that is occurring. I think I was pretty repetitive in what I just said, but in full transparency, I know that I have a lot to learn in this area. And so I appreciated Nancy sharing her viewpoints with me.

I'm also going to put in the show notes some materials that were shared with me by one of our team members that I have found to be helpful as well. And I was pulling them up as I was creating our Title IX University course. So it is a glossary of terms, a guide to being an ally to transgender and non-binary youth, as well as some information on gender neutral pronouns. So without further ado, let's turn to this conversation. I'm learning so much just listening to you. And I think this will be really helpful because this is an area that the focus has been so heavily on addressing and responding to allegations of sexual harassment as it should be, very important, that work needs to continue. But historically, when people said Title IX, they said gender, equity in athletics. And that's still a thing, it's still something, as you said, Title IX coordinators need to be concerned with, overseeing, involved in. And so that reflect [crosstalk].

Nancy Hogshead-...: Yeah, in the OCR, when you look at the complaints that they're getting every year, athletics dwarfs everything else by a factor of five. As big as we think sexual violence is on campus, again, athletic complaints are much, much, much, much bigger. The issue is the OCR when they come in to go resolve that complaint is they'll say, okay, we'll fix uniforms, but they don't go and fix scholarships and [crosstalk].

Courtney Bullar...: Not holistic. Yeah.

Nancy Hogshead-...: ... daddy issues. They go and do these little things.

Courtney Bullar...: Interesting. Well, so that probably transitions us somewhat well into trans-inclusion in sports, which is, well, originally I swear we've been, I saw you on Twitter. No, yes. Twitter, and then I reach out, I want to say it was two years ago, the pandemic year for me, just sort of, I don't know, it's like this mush in my brain, but when I was looking back, I was like, you know what? This has been a while. So when I first reached out to you, it was to talk about gender equity in athletics, everything we really just covered, and then trans-inclusion in sports has gotten a lot more attention and been at the forefront. And I know you have the women's sports policy working group that's focused on this. And so I wanted to see if you could explain to just the everyday person, what is the issue here? I know there's full exclusion camp, the full inclusion camp, and then everything in between, but just starting at the basics, what is going on?

Nancy Hogshead-....: The basics. Okay. So I've been, again, saying the same thing, as I said for the last 30 years, which is, if you want to give girls and women an equal opportunity to participate in sports, they need their own team.

Courtney Bullar...: Right. Okay.

Nancy Hogshead-....: Right. But back for the last 30 years, that has been in response to the repetitive question of why do we sex segregate in sports? And it is hard for people to wrap their heads around this separate but equal. We've been trained so well in Brown versus Board of Education, no separate but equal. In sports, we have that separate but equal. And so I was saying, girls need their own teams, girls and women forever. And now with trans-inclusion, it's just, it's a variation on the same theme, which is some people want full inclusion. And so two years ago when the equality act passed the house, it did not include an exception for competitive sports. Okay. Not for recreational sports, that's all fine.

And then when president Biden came out with an executive order saying that there was going to be full inclusion, we crafted legislation and Title IX of how can we include trans people in sports, both trans men and trans women, how can we include them? How can sports be the solution to some of the hatred that's out there? How can we, but still have these boundaries around girls and women's sports. That is the reason why we sex segregate in the first place. Okay.

Is it about identity, or is it about biology? So all trans athletes are not alike. There are some trans athletes who transitioned, or maybe for a biological reason, they never go through male puberty. And if they don't go through male puberty, then they don't have that sex length advantage. And for that category, there's really no reason not to just include categorically. So all these states that are passing these state laws, that they wouldn't even allow a trans athlete who had never been through male puberty to be able to compete in the girls and women's category. And we just don't agree with that at all.

Courtney Bullar...: Yeah.

Nancy Hogshead-....: There's another category. Somebody who's been through male puberty, but then they've mitigated that male puberty. So they're on gender affirming hormones, or maybe they've had surgery, but they've done something to mitigate their sex length advantage. They've been doing it for a certain amount of time, a year, three years, whatever. So for those people, we say that they should be included in as consistent with say the current NCAA rule, or the current International Olympic Committee rule. [crosstalk]

Courtney Bullar...: To back up really quick, there are rules in place is what you're saying. NCAA has rules.

- Nancy Hogshead-...: Yeah. If the equality act passed with no sports exception, then the NCAA rule could not exist because gender identity discrimination is sex discrimination.
- Courtney Bullar...: Got it.
- Nancy Hogshead-...: So you wouldn't be able to make any distinctions, I'm about to tell you another category of somebody who's trans, you wouldn't be able to [crosstalk].
- Courtney Bullar...: Yeah, he'd be in violation.
- Nancy Hogshead-...: Correct. Correct.
- Courtney Bullar...: Okay. So tell me the third category.
- Nancy Hogshead-...: Yeah. Well, you and I both know that, when a court is looking at interpreting a statute, they look at what is a legislative history and does this later pass legislation impact this other legislation? So according to both of those, we would not be able to have the NCAA rule, or wouldn't even be able to host international competitions in the United States. So we've got the Olympics coming up in 2028. And if we don't have an exception, we're not going to be able to do it. There is a third category of transgender athletes, and these are our transgender women who, for whatever reason, they don't want to change their bodies. They love their bodies exactly the way... They identify as being female. And we say they should be included in girls and women's sports except no head to head competition.
- So it may be that, you don't notice anything different except for the podium. So at the end, so a lot of, in para sports you see this a lot, where they're in one race, you'll have three different categories and there are all different kinds of things, there's so many different sports where different accommodations would be different based on that different sport. But we want sport to be the solution for trans-inclusion at the same time as we want to enforce the boundaries of girls and women's sports.
- Courtney Bullar...: So for that example, the third category that you just gave, would an example be, so let's just take running, of course, my daughter is a big track runner, so I'm about to go take her to her training. So it's just in my mind, when you say head to head, is that what you're referring to? So transgender athletes would have, who are in the third category, would go against each other?
- Nancy Hogshead-...: Don't want to, yeah, mitigate, maybe they're not sure, maybe they're not ready yet, or maybe they just don't want to, they don't [crosstalk].
- Courtney Bullar...: But they would be racing for the podium against each other, or are you saying [crosstalk].

Nancy Hogshead-....: Yeah, they would be part of girls and women's sports, but they would not be going for the record. They would not be able to, the making a living part of it, the setting records, the being in the hall of fame, the all that kind of stuff.

Courtney Bullar....: To a college sport, you got track team, they would be competing like anyone else for second, third in every, all the one million things that happen in track, or swimming, or all the events. Is that what you're saying?

Nancy Hogshead-....: Yeah. They would be competing, but they would be a separate podium for trans athletes that do not want to mitigate their sex length advantage.

Courtney Bullar....: That makes sense to me. Okay. Got it. And so you all are trying to work out these policies and come up with solutions to help. Where is that in the process? Because I'm seeing all over the place, this state and that state and this state, what's going on?

Nancy Hogshead-....: Yeah. We're seeing the exact same thing. We're actually, so far just because we have limited bandwidth on exactly how much we can do, but we're only working in the states that are trying to be trans exclusive. They're trying to use sport as a way to heap on their hatred of this cultural phenomenon of people picking what their gender identity is. And that's exactly what we want to not have happen, is to have sport be the vehicle. It used to be, remember 20, 30 years ago, that a man could not come out as gay the locker room, because he was afraid he was going to get killed. So same thing here is we've done a lot of work to make it really safe for people who were gay and lesbian, to be able to participate in sports and to be celebrated for who it is that they are. We want to do the same thing for transgender athletes. And we also want the standard for competing in the girls and women's category to be flexible based on, number one, the sport, but also the science is changing all the time.

The science between what, going through male puberty gives somebody is crystal clear. So that's somebody as amazing as say Katie Ledecky who, she was 27 seconds faster than her next competitor. She is just over 2% faster than her next competitor. Okay. She's about 3% faster than the whole field. Okay. Only 3%. The difference between being male and female is between eight and 20% faster. So people talk about Michael Phelps having, oh, he was so amazing, and he had these unique advantage that other people didn't have. And Michael Phelps is only 0.02 faster than his closest competitors, 0.02, as opposed to eight to 20% faster. So with that science, we absolutely know. And what we're learning more and more about is what happens when somebody mitigates their sex length advantage and how long do they need to be doing it and how far.

Courtney Bullar....: Well, and I think your explanation of the different categories that trans people will fall into, depending on where they are in their journey, is so helpful. I think what's frustrating, I live in the South, so yeah. And so it's hard when I talk to folks, you want to, they just need to be educated. That's where I think you're so helpful, and why I'm so glad you're on here to explain, it's not a one size fits all.

It's not a, everyone [crosstalk] excluded, and now every female athlete is going to be disadvantaged as a result of including everyone, or there can be a happy medium. And like you said, the science is evolving. Yeah. So really fascinating.

Nancy Hogshead-...: I think people are really concerned, on the one hand they want to be loving and affirming to transgender people, but at the same time they do recognize, we notice that high school boys are going faster, jumping higher than the women's Olympic world record holders.

Courtney Bullar...: Yeah.

Nancy Hogshead-...: So, if we want to have... You could slice up sports any way that you want to, like wingspan and height. There's so many different ways that you could slice that up, but no matter how you slice it, half the population will not get an opportunity to excel. And if we don't have a sex linked two category fair.

Courtney Bullar...: Safeguard basically [crosstalk].

Nancy Hogshead-...: I remember I met somebody who... Anyway, but I do think most people's intuition is that they want to be loving and helpful and want to make somebody who's transgender make their lives better, not worse. So if you go on to it's a women sports policy group, womensportspolicy.org, and there's model, state statutes, there's model, federal statutes, there's model, changes to make to the Title IX regulations that make this fine distinction between gender identity and gender identity discrimination and sex discrimination. And we try to have the whole question answer just so people can get comfortable. Now I feel like sometimes like my role is to really talk about uncomfortable topics until they become comfortable, until people can get comfortable enough so that they move into the thinking part of their brain and not that emotional part of their brain.

Courtney Bullar...: Oh, that's such a good distinction. That's something that I myself, even when you're having conversations, and I know people have friends, colleagues who are trans, but nonetheless, still trying to get comfortable because I want to make them feel comfortable. And so I always want to be mindful of how I speak and act, and that I'm inclusive, but you're right. They're getting out of that emotional reaction phase to being able to really think critically about these issues is so crucial. And unfortunately, some of our Southern states, which I love being a southerner, they lead with that emotion and fear. I always say it's fear. It's just leading with fear and coming up with these things without being fully educated. I'll say it.

Nancy Hogshead-...: Yeah. There absolutely is a way to include trans athletes and still give a place for girls and women to shine in sport.

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Courtney Bullar...: Okay. The last thing I wanted to just bring up, because I think it's amazing. So, my bucket list is to go to the Olympics. So my dad was a professional athlete, played soccer, was over the World Cup, been around athletes my whole life, but I never touched a soccer ball. My daughters play though, soccer, track, whatever. My bucket list is to go to the Olympics. And so it all rides on my youngest child and for her to make it to the Olympics. I want to go just as a spectator, but it'd be even better if I knew someone in competing. So, that's just amazing. And I saw where you was recently announced where you're appointed to the Olympic Commission. Congratulations. That's amazing. And I just wanted you to share what that means and what you are going to be doing, because it's incredible.

Nancy Hogshead-...: Oh, thank you, Courtney. Well, another hat that I wear is I'm the co-chair of a group called the Committee to Restore Integrity to the United States Olympic and Paralympic Committee. And we also call ourselves team integrity. And for the last several years we've been working on the issue of how do you transfer power? So the whole Larry Nassar issue was more than it was a sexual abuse issue. It was a power issue in athletes having none of it. So most people understand how NCAA sports work. They really don't understand how the Olympic Movement works. And that works to the advantage of the people that work in the Olympic Movement because people don't know what's going on. So, they may know how the NFL and how the draft, and where people are pretty sophisticated about that stuff. They really don't know the Olympic Movement, or even that it's governed by a statute that was written in 1978.

And that statute governs, well, governance, governs how the corporation is set up. And it gives the Olympic committee a monopoly over those five rings, which are crazy valuable. And then it also has a monopsony they're the only buyer of Olympic talent. So if you want to go to the Olympics, you have to go through the system. So this was actually our second piece of federal legislation that we just recently got passed this November. The first one had to do with protecting athletes. So we made everybody in the Olympic Movement is a mandatory reporter and it's a criminal law if they don't report, if they know, or they have reasonable suspicion. The Olympic Movement is not 800 athletes every four years, the Olympic Movement is 16 million athletes. So number one.

And then two is we gave the Olympic committee a legal duty to protect athletes from physical, emotional and sexual abuse. So, that was good, the first one. The second one had to do with empowering athletes. So we took the Olympic, the representation from 20% up to 33%. And we've gotten more seats on the board for the United States Olympic Committee for athletes in particular. So there for a while, you can imagine in the system of having a monopoly, no oversight, having a monopsony, that the kinds of abuses that were happening also had to do with health insurance and pregnancy discrimination and overuse injuries, and athletes not being able to say that they were, they didn't have a no. So just I couldn't for second there, they weren't allowed to say no. So we're trying to balance out the power structure to be more like professional sports.

So the power structure in the Olympic Movement, the amateurism died in 1992, 30 years ago. And yet we still treat athletes like they're amateur. They're not, they're not amateurs. Everything that the NCAA athletes want Olympic athletes already have it, but what are the ways that they're kept from being able to use it? So this commission is part of the statute that was passed back in November. It's 16 people and it is designed to look at the Olympic Movement and how is it that we can structure it so that we have some oversight and that athletes have more power.

Courtney Bullar...: The last thing I just want to say, as we wrap up is, or ask you, you speak, obviously you teach, you've got your company, if a Title IX coordinator or an institution wanted to have you come and speak, is that something you do? And I know you have a lot of services, obviously you've got a lot going on, so we can't cover it all, but just some high level ways that people can find you, if they wanted to seek out your help or even have you help educate their campus.

Nancy Hogshead-...: Yeah, I go on, I'm a little different in that I say that I will go in and say, evaluate salaries or go in and evaluate the team. My thing is though, you cannot use attorney client privilege in order to keep the rest of the school from being able to see it, because I've done too many of those. I quit doing it when schools would say, we want to hire you. And then the coach would come back to me, who I had just said, they need to be making \$40,000 more. And I couldn't say anything about what it was that my recommendation was, but they were not [inaudible] any [crosstalk].

Courtney Bullar...: I have been there, done that, on the side of doing audits of programs and all that.

Nancy Hogshead-...: Yeah. If you want it to be public, and if you want to say that you're in compliance with say prong three, that you're meeting the interest and abilities, it's actually a pretty detailed, it's not easy to comply with prong three, because once you dig, sure enough students do want to participate. But if you do want to have all the background and whatever, I'll definitely help out. And what I mostly want is for people to be supportive in helping those 18 to 22 year olds be

able to hire a lawyer, that's going to pressure to be able to restructure the whole athletic department.

Courtney Bullar...: Thank you so much. I love all the passion you bring, but [Tina] and I are very, one of my colleagues, we just have a lot of energy all the time and I'm getting to sit here and listen, but I'm watching you. And I'm like, I love it. You're so passionate about what you do. And just the way that you've articulated the information, I think it's going to be really valuable to folks on the ground, and I have no doubt I'll be calling on you again to be on the podcast [crosstalk].

Nancy Hogshead-...: Just remember, yeah. Champion Women is a nonprofit. So I don't get paid for working for the Olympic commission or getting the statutes passed, or working with NGBs, or all the information that we put out there. Instead, we rely on donations. So if you go on to [championwomen.org](http://championwomen.org), and sometimes the nicest thing somebody can do for us is to recommend a charity, or a fund that we might be able to qualify for. But yeah, virtually nobody's doing what we're doing. Nobody.

Courtney Bullar...: Yeah. Excellent. Okay. Well, we'll make sure to have all your information in the show notes, but so that folks can look you up and look at all the good work you guys are doing and just [inaudible] really enjoyed talking with you.

Nancy Hogshead-...: Yay. We made it.

Speaker 5: Thanks Courtney.

Courtney Bullar...: Thank you. Have a good one.

Nancy Hogshead-...: Yeah. Thanks so much. Yeah. All right. You too. Have a good one. All right.

Courtney Bullar...: Thanks. You too. Bye.

Nancy Hogshead-...: All right.

Courtney Bullar...: Two episodes, and a lot of information from Nancy that I hope is educational and helpful to you in understanding what is going on in this space, in these very important conversations around transgender rights. Quick note as we close out, and we will do another podcast asked on this, but a reminder for my Title IX coordinators. Another item with respect to NCAA, which is regarding sexual assault. In 2001, the NCAA board of governors updated its campus sexual violence policy to require all member schools to vet all incoming and transfer student athletes. By the 22/23 academic year, each university president, director of athletics and Title IX coordinator of the NCAA school must attest to four different items that I'm not going into detail about here, but I do have a blog post on it. We're also starting to work with institutions I'm preparing for these reports. So I wanted to go ahead and note that as well.

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