



**CAIR Legal Defense Fund**

453 New Jersey Ave. S.E.

Washington, D.C. 20003

Tele 202-742-6420 Fax 202-379-3317

E-mail: [civilrights@cair.com](mailto:civilrights@cair.com) URL [www.cair.com](http://www.cair.com)

U.S. Department of Justice  
Civil Rights Division  
950 Pennsylvania Avenue, N.W.  
Washington, D.C. 20530-0001

*Via Mail*

July 14, 2020

**Request for Investigation into  
Violation of Ms. Rania Barakat's Title II Rights**

Dear U.S. Department of Justice – Civil Rights Division:

Our office represents Ms. Rania Barakat. We are writing to bring to your attention civil rights violations by Frontier Justice KCMO, LLC for denials of services to Ms. Barakat and similarly-situated Muslim women who wear hijab—a religious head covering. We believe Frontier Justice is in violation of Title II of the Civil Rights Act of 1964. 42 U.S.C. §2000a. We request an investigation into these allegations of religious discrimination.

On New Year's Day 2020, Ms. Barakat and her husband attended Frontier-Justice. At the time of the visit, Ms. Barakat was wearing a hijab in accordance with her religious belief. Ms. Barakat and her husband enjoy attending gun ranges and have visited several in the past without any issues and with her hijab.

When Ms. Barakat approached the cashier, the employee told her that she must remove her hijab in order to use the facilities, citing the company's dress code policy. After Ms. Barakat repeatedly asked to see the dress code policy, as it is not posted visibly in the store, the employee responded that "hats, caps, bandanas, or any other head covering will be removed in the facility, except baseball caps facing forward." When Ms. Barakat asked the employee the reasoning as to why her hijab is included in the policy, the employee responded that there was none. Ms. Barakat asked to see the manager, Manager Danielle.

Manager Danielle explained the reasoning behind the policy was that shrapnel can cause her hijab and skin to burn. Such reasoning is clearly pretextual and discriminatory as it makes no logical sense- a hijab is no different than other clothing and baseball caps that are regularly worn and permitted in the gun range.



**CAIR Legal Defense Fund**

453 New Jersey Ave. S.E.

Washington, D.C. 20003

Tele 202-742-6420 Fax 202-379-3317

E-mail: [civilrights@cair.com](mailto:civilrights@cair.com) URL [www.cair.com](http://www.cair.com)

---

Ms. Barakat and her husband explained that they have gone shooting multiple times previously wearing her hijab in the past with no issues. Further, Ms. Barakat's husband explained that people wear long sleeves and shirts that cover their necks to protect them from shrapnel. Manager Danielle firmly stated that those gun ranges are not Frontier Justice and they have different rules. Manager Danielle's tone was aggressive and loud, stating that "it is New Years, and we are really busy," in an effort to have Ms. Barakat and her husband leave. Ultimately, Ms. Barakat and her husband decided to leave the range. While leaving, the cashier and another employee apologized for her having to go through this and said they did not understand the reasoning for the policy either.

The next, day Ms. Barakat and her husband attended another gun range, Target Time Defense, and discussed the situation. They were shocked and stated that they are more than welcome to shoot with her hijab any time. When Ms. Barakat called Frontier Justice later in the week, they refused to provide additional information regarding the incident on New Year's Day.

Frontier Justice violated Title II of the Civil Rights Act of 1964 when it refused service to Ms. Barakat, unless she removed her hijab. According to Title II, "All persons shall be entitled to the full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations of any place of public accommodation, as defined in this section, without discrimination or segregation on the ground of race, color, religion, or national origin" 42 USCA § 2000a. As a place of exhibition or entertainment, Frontier Justice gun range is an establishment required to comply with Title II.

Frontier Justice blatantly denied services to Ms. Barakat unless she removes her hijab. Frontier Justice has also denied other Muslim women services unless they remove their hijab. Frontier Justice has discriminated against and shown hostility to Muslim women who wear hijab because its policies actively exclude Muslim women from enjoying their services. Frontier Justice's explanation that its policy, disallowing Muslim women from wearing the hijab, promotes safety, is without merit and discriminatory.



**CAIR Legal Defense Fund**

453 New Jersey Ave. S.E.

Washington, D.C. 20003

Tele 202-742-6420 Fax 202-379-3317

E-mail: [civilrights@cair.com](mailto:civilrights@cair.com) URL [www.cair.com](http://www.cair.com)

The military and various policies departments across the country have all allowed Muslim women to wear the hijab while handling firearms. On, February 7, 2020 the Air Force made amendments to AFI36-2903 military standards for dress and personal appearance of personnel. Such amendments allowed for the religious accommodation for hijabs, beards, and turbans. Air Force Instruction 36-2903, Dress and Personal Appearance of Air Force Personnel, Secretary of the Air Force, (Feb. 7, 2020). In 2017, the Army implemented a similar regulation allowing for religious coverings in uniform. Meghann Myers, "New Army Policy Oks Soldiers to wear hijabs, turbans, and religious beards" *Army Times*, (Jan. 5, 2017). Not once is the mention of wearing a hijab a concern for safety. In 2019, Paterson Police Department in New Jersey swore in a female police officer who wears *hijab*. In 2014, the St. Paul Police Department implemented a policy allowing Muslim police officers to wear the *hijab*.

Ultimately, Frontier Justice denied Ms. Barakat from participating in its establishment based on her religion. Frontier Justice violated Ms. Barakat's Title II rights by refusing service because of her sincerely-held religious belief that she must wear hijab. Frontier Justice has also denied services to other Muslim women and continues to do so.

We request an investigation into these civil rights violations. Please do not hesitate to contact our office should you have additional questions.

Respectfully,

CAIR Legal Defense Fund

Gadeir Abbas

Senior Litigation Attorney\*

[gabbas@cair.com](mailto:gabbas@cair.com); (202) 742-6420

*\*Licensed to practice in VA, not DC.*

*Practice limited to federal matters.*

Zanah Ghalawanji

Staff Attorney\*

[zghalawanji@cair.com](mailto:zghalawanji@cair.com); (202) 742-6420

*\*Licensed to practice in MI, not DC.*

*Practice limited to federal matters.*