

EDWARD B. CLOUTMAN, Jr.  
SYLVIA M. DEMAREST  
Dallas Legal Services Project  
2842 Singleton Blvd.

next friend RICHARD MEDRANO; indiv- )  
dually and on behalf of all others )  
similarly situated. )

COMPLAINT

I.

	<u>AGE</u>	<u>GRADE</u>	<u>SCHOOL</u>
Nelba Ann Croun	14	9	Anderson Jr. Hi.

Nettie Marie Cates by Bobbie Lean Cobbin	9	4	Rhodes Elem.
Tony Jefferson	14	8	Anderson Jr. Hi.
	13	7	Anderson Jr. Hi.

whom are chicano (7%); and 103,900 of whom are Anglo-American (Due to the absence of 1970-71 figures, the above figures are based on

VI.

The Dallas Independent School District operates 181 schools at present.

VII.

following facts:

- A. No white children have ever been assigned to predominately black or chicano schools.
- B. No faculty or administrative staff in the defendant school district has the required number of black or chicano teachers or employees.
- C. The athletic and extra-ciricular programs maintained by

Anglo-American or white students attend schools in which they in turn are in a great majority.

FACTS PECULIAR TO CHICANO STUDENTS

IX.

The educational opportunities offered to chicano students are distinctly inferior in that:

- a.) The defendant district has failed to assess special needs of the students of Mexican-American or Mexican National descent and as a result has not fashioned a

relevant educational program for these students:

- b.) The defendant district has not only discriminated against

chicano students on account of race, but also on account of language differences.

FACTS PECULIAR TO BLACK STUDENTS

X.

The defendant district has continued, through the operation of its schools, "to attach to its black students a "badge of slavery"

in violation of the prohibitions of the Fifteenth Amendment and to

XII.

Thirteenth and Fourteenth Amendments to the United States Constitution,

1865, 1868, 1893, 1895, and 2004, and such operation

irreparably injures and will continue to so injure plaintiffs and the  
they represent unless enjoined by this court. Plaintiffs

have no adequate remedy at law.

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D. Tex

WHEREFORE, plaintiffs pray that this court preliminarily and

Morris Street and Kingbridge Road  
and specifically the selected sites for proposed construction  
located at:

1. Van Cleave, Magna Vista, and Tips Blvd.
  2. North Winnetka and McBroom Street
  3. Fishtrap and Canada Drive
  4. Morris and Kingbridge
4. To achieve a uniform quality of instruction, transportation,

and services by defendants by allocating and expending  
county and state monies only.



those persons in each school.

4. The formulation of a tri-racial committee, to be composed of an equal number of whites, blacks and chicanos, which will in turn advise the Dallas Independent School District on any matter concerning desegregation of that school district including new construction, and the establishment of programs designed to promote equal educational opportunities;
5. The establishment of a program designed to enlighten and sensitise school personnel and school board representatives as to cultural and racial differences of the students in the

VERIFICATION

BEFORE ME, the undersigned authority, came and appeared

After reading the foregoing complaint I swear that the

