

**BEFORE THE UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF CIVIL RIGHTS**

Q.B. on behalf of K.S. & R.S.,)	COMPLAINT UNDER TITLE VI OF
T.D. on behalf of K.D.,)	THE CIVIL RIGHTS ACT OF 1964
J.H., and all similarly situated students,)	
)	
Complainants,)	
)	
v.)	
)	
JEFFERSON PARISH PUBLIC SCHOOL)	
SYSTEM and the JEFFERSON PARISH)	
SCHOOL BOARD,)	
)	
Respondents.)	

ADMINISTRATIVE COMPLAINT

This is an administrative civil rights complaint filed under Title VI of the Civil Rights Act of 1964 on behalf of African American school children disproportionately subjected to arrests and seizures in Jefferson Parish Public Schools. The Complainants maintain that the Jefferson Parish Public School System (“JPPSS”) under the governance of the Jefferson Parish School Board (“JPSB”) has discriminated against them on the basis of race by administering district-wide school arrest policies and practices that have a discriminatory impact on African American students. African American students represent approximately 46% of JPPSS’ student population; yet comprise nearly 76% of all school-based arrests. The Complainants file this Complaint on behalf of themselves and all other similarly situated students.

JPPSS has, by written agreement, contracted with Jefferson Parish Sheriff’s Office (“JPSSO”), and delegated to it the authority to enforce school rules. JPPSS has a policy of placing police officers on its school campuses, and has tasked them to enforce routine school rules,

“including monitoring student movement in the halls, checking parking permits, etc.”¹ By this policy and contract, JPPSS has guaranteed that minor violations of school rules will result in criminal arrests. This policy and delegation of JPPSS’ school discipline authority has resulted in the disproportionate arrest of African American students.

Complainants further allege that they have been subjected to racially charged statements and slurs verbalized by school police during the course of arrests, seizures, or investigatory stops on campus, evidencing discriminatory intent on behalf of the officers assigned to specific school sites. During one such arrest, a Jefferson Parish Sheriff’s Officer, working as a police officer on campus and assigned to Bonnabel High School, used a racial epithet towards an African American female student. In a separate incident, the same officer told an African American male student that he would “amount to nothing more than a white chalk outline.” When parents complain to school officials about over-policing in schools and racial tensions between children and law enforcement officers, they are ignored.

The Complainants therefore ask the Office of Civil Rights to: (1) Accept jurisdiction and fully investigate these claims; (2) Compel JPPSS to overhaul current school arrest policies and practices; (3) Ensure that African American students are not unfairly targeted for arrests; (4) Monitor and track all police incidents and arrests in Jefferson Parish public schools; 5) and Mandate that JPPSS implement alternative discipline strategies to reduce law enforcement interaction and arrests on school campuses.

I. INTRODUCTION

African American residents represent a racial minority in Jefferson Parish.² For decades, Jefferson Parish public schools have struggled to provide equal educational opportunities for all

¹ Police on Campus Contract, Attachment A and B, Exhibit 1

² U.S. Census Bureau, 2010.

students. For approximately 47 years, Jefferson Parish public schools operated under federal court supervision originating from a 1964 desegregation lawsuit.³ A federal district court declared JPPSS unitary on August 2, 2011.⁴ During the 2010-2011 school year, the Jefferson Parish School Board (“JPSB”) faced allegations that qualified African American students were being denied admission to the school district’s selective advanced academy school sites because of inconsistent and subjective admissions policies that varied at individual schools.⁵ As a result of these complaints, JPSB adopted a centralized admissions process.⁶

Respondent JPPSS’ school arrest practices face a similar problem—there are no clear, centralized policies to communicate when students will be subject to an arrest for misconduct that does not involve weapons, drugs, or serious bodily injury. Likewise, there are no guidelines for when such incidents should be handled by school officials, without police involvement.

JPPSS contracts with local municipalities to assign full and part-time law enforcement officers, acting as Police Officers on Campus (“POC”), to Jefferson Parish middle and high schools. JPPSS has given POCs the unfettered authority to stop, frisk, detain, question, search, and arrest schoolchildren on and off school grounds while they are on duty.⁷ They “assist in enforcing school rules, including monitoring student movement in the halls, checking parking permits, etc.”⁸ Complainants report that Jefferson POCs patrol school campuses in full uniform and carry firearms, tasers, batons, and handcuffs. In 2009, JPPSS renewed a two-year \$600,000

³ *Lena Vern Dandridge v. Jefferson Parish School Board*, 456 F.2d 552 (5th Cir. 1972).

⁴ Mark Waller, “*Jefferson Parish schools are sufficiently integrated and free from federal oversight, judge rules*” Times-Picayune, August 3, 2011, http://www.nola.com/education/index.ssf/2011/08/after_looming_long_and_large_o.html.

⁵ Mark Waller, “*Jefferson Parish magnet school admissions process disorganized, dysfunctional, report says*” Times-Picayune, January 19, 2011, http://www.nola.com/news/index.ssf/2011/01/report_describes_jefferson_par.html.

⁶ Mark Waller, “*Centralized admissions plan takes decisions out of Jefferson Parish academy principals’ hands*” Times-Picayune, January 31, 2011, http://www.nola.com/education/index.ssf/2011/01/centralized_admissions_plans_t.html.

⁷ Police on Campus Contract, *See* Exhibit 1, *supra* note 1.

⁸ *Id.*

contract with the Jefferson Parish Sheriff's Office ("JPSO"), hereinafter referred to as the "POC Agreement," that would provide salaries, wages, overtime, uniforms, and weapons for all POCs stationed on school campuses.⁹ Jefferson POCs clearly function as the agents of the school system.

Respondent JPPSS has endorsed an inadequate training program for Police Officers on Campus working at schools under its jurisdiction.¹⁰ "Police officers generally are trained to deal with adult perpetrators on the street, not children in schools."¹¹ "[School resource officers] may need help to 'unlearn' some of the techniques they learned to use on patrol duty that are not appropriate in dealing with students, for example, resorting too quickly to using handcuffs or treating misconduct as part of a person's criminal make-up" ¹² The current school resource officer curriculum is ill-equipped to prepare officers for the school environment and contains no meaningful lessons on child and adolescent development, de-escalation techniques, behavioral precautions and protections for students with special needs or guidance on securing the trust and cooperation of students. ¹³

Respondent JPPSS was made aware of racial disparities in school arrest data through interagency information sharing with the Jefferson Parish Department of Juvenile Services. Although various Jefferson Parish juvenile justice agencies have made significant strides towards implementing parish-wide incarceration alternatives and delinquency diversion programs, racial disparities in school arrests persist in Jefferson Parish public schools. In addition, Respondent JPPSS' POC program does not provide any mechanisms for accountability and transparency.

⁹ School Resource Officer Training Manual, Exhibit 2.

¹⁰ *Id.*

¹¹ *Policing in Schools: Developing a Governance Document for School Resource Officers in K-12 Schools* (ACLU, New York, N.Y.), August 2009, at 24.

¹² *Id.* at 24.

¹³ School Resource Officer Training Manual, *See* Exhibit 2, *supra* note 9.

Respondents have failed to maintain a meaningful complaint resolution system to investigate and resolve allegations asserted by the Complainants. Parents have complained to JPPSS about the arrest policies, to no avail. Complainants therefore seek assistance from the Office of Civil Rights.

II. JURISDICTION

This complaint is authorized by Title VI of the Civil Rights Act of 1964. The U.S. Department of Education, Office of Civil Rights, has jurisdiction over a claim involving racially based conduct that consists of different treatment to students on the basis of race that occurred in the context of an operation of an elementary, secondary or postsecondary school or institution or other entity that is a recipient of federal funds. 34 C.F.R. § 100.3(b)(2). The Respondents are public entities and are recipients of federal financial assistance and are therefore subject to Title VI of the Civil Rights Act of 1964. The discrimination detailed in this complaint is both ongoing and has occurred within the last 180 days.

III. COMPLAINANTS

The Complainants are four African American schoolchildren in Jefferson Parish who, at all relevant times, were excluded from a Jefferson Parish public school as a result of the Respondent school system's arrest policies and practices. They bring this Complaint on behalf of themselves and all other similarly situated students.

K.S. is fourteen years-old and is enrolled in the 9th grade at Bonnabel High School in Kenner, Louisiana. At all relevant times, K.S. was, and she continues to be, enrolled in a public school operated by Jefferson Parish Public School System and Jefferson Parish School Board.

R.S. is fifteen years-old and is enrolled in the 9th grade at Bonnabel High School in Kenner, Louisiana. At all relevant times, R.S. was, and he continues to be, enrolled in a public

school operated by Jefferson Parish Public School System and Jefferson Parish School Board.

J.H. is eighteen years-old and is enrolled in the 9th grade at Bonnabel High School in Kenner, Louisiana. At all relevant times, J.H. was enrolled in a public school operated by Jefferson Parish Public School System and Jefferson Parish School Board. J.H. dropped out of school in November 2011.

K.D. is fifteen years-old and is enrolled in the 8th grade at John Quincy Adams Middle School in Metairie, Louisiana. At all relevant times, K.D. was, and he continues to be, enrolled in a public school operated by Jefferson Parish Public School System and Jefferson Parish School Board.

IV. RESPONDENTS

Respondent Jefferson Parish Public School System (“JPPSS”) is the local education agency (“LEA”) responsible for the administration and operation of Jefferson Parish public schools under the governance of the Jefferson Parish Public School Board (“JPSB”). JPPSS is a recipient of federal financial assistance totaling approximately \$110 million.¹⁴ JPPSS’ school officials are responsible for implementing discipline and school safety and security policies for all schools under its jurisdiction.¹⁵ JPPSS school officials, specifically school principals, are responsible for supervising law enforcement officers stationed on its campuses, including, but not limited to full-time officers assigned through the school district’s “Police on Campus” program and all part-time detail officers.¹⁶

Respondent JPSB is an independent legislative body created under Louisiana Revised Statute 17:51. JPSB has the power to make rules and regulations for its own government

¹⁴ Nat’l Ctr. Educ. Statistics, Digest of Education Statistics, Public School Districts: Selected Years, 2009-2010, Exhibit 3.

¹⁵ JPPSS, 2011-2012 Procedures and Policies for Parents and Students, at 9., Exhibit 4.

¹⁶ Police on Campus Contract, Attachment B, *See* Exhibit 1, *supra* note 1.

consistent with the laws of the State of Louisiana and the regulations of the State Board of Elementary and Secondary Education, to levy taxes and collect revenues through state-approved means.

V. FACTS RELATING TO THE COMPLAINANTS

K.S.

K.S. is a fifteen year-old, African American female enrolled in the 9th grade at Bonnabel High School in Kenner, Louisiana. On September 13, 2011, a JPSO officer assigned to K.S.'s school subjected her to an unreasonable arrest and seizure and used a highly offensive racial epithet.

That day, K.S. and a friend were skipping class. A school administrator saw the two students and called after them. In order to avoid being caught, the two students ran and hid in the gym. As they left the gym to return to class, they encountered a Police Officer on Campus assigned to Bonnabel High School. K.S. was intimidated by the officer and refused to answer his questions. The officer became angry and told her that she was under arrest for "Disturbing the Peace" and "Obstruction of Justice." The officer handcuffed her in the school hallway and led her back to the security office. No school officials were present. While in the security room, the officer used profanity towards K.S. and ordered her to "sit the f*ck down." Once the officer sat down behind his desk, K.S. heard him say, "n**gers these days." K.S. was shocked and humiliated.

Shortly thereafter, the Police Officer on Campus led her outside of the school into a police wagon to be transported to Rivarde Detention Center, the juvenile detention facility for Jefferson Parish. An adult woman who was being transported to the adult facility was also in the police wagon. K.S. was never read her Miranda rights. The following day, K.S. was issued a 2 day out-of-school suspension for "disrespect for authority" in relation to the arrest. K.S. fears

that she will be subjected to an arrest in the future. She intentionally avoids the Police Officer on Campus when she sees him in the hallway. Ever since the arrest, K.S.'s grades have suffered and she has become disengaged in the academic process.

R.S.

R.S. is a fourteen year-old, African American male enrolled in the 9th grade at Bonnabel High School in Kenner, Louisiana. On September 13, 2011, a Police Officer on Campus assigned to R.S.'s school subjected him to an unreasonable arrest and seizure and used inappropriate, racially charged language towards him.

That day, a teacher confiscated R.S.'s cell phone during class. The teacher advised R.S. that his cell phone would be returned at the end of the period. When R.S. asked for his phone back later on that afternoon, the teacher's assistant advised him that it was school policy that students must wait five days to reclaim cell phones confiscated on school grounds. R.S. is a special education student diagnosed with the exceptionality of Emotional Disturbance. He became upset and began to verbalize his frustrations about the cell phone policy. The teacher called the school dean to come to the classroom. R.S. attempted to leave the classroom to "cool down" as permitted in his Individualized Education Program ("IEP"). The school dean refused to allow R.S. to leave the room and called for the Police Officer on Campus assigned to Bonnabel High.

The officer arrived at the classroom and placed R.S. in handcuffs. The officer called R.S. a "piece of shit" in front of the class, humiliating him in front of his peers. The officer then proceeded to tell R.S. that he was a "punk" who "wouldn't amount to anything more than a white chalk outline." The officer led R.S. out of the classroom and into his office. R.S. remained in handcuffs for nearly an hour before the officer removed them. On the following day, school

officials issued R.S. a 2 day out-of-school suspension.

R.S. is a star athlete and plays football and basketball for a community center in his neighborhood. He was looking forward to playing basketball for his high school in the spring. But ever since the arrest, R.S. has developed a distrust of school officials. He has developed resentment towards school and his grades have suffered. R.S. is fearful that he could be subjected to an arrest or harassment in the future.

J.H.

J.H. is an eighteen-year old, African American male, who, at the time of the events alleged herein, was enrolled in the 9th grade at Bonnabel High School in Kenner, Louisiana. On September 30, 2011, a Police Officer on Campus assigned to J.H.'s school subjected him to an unreasonable arrest and seizure and used racially charged language towards him.

That day, J.H.'s second period teacher gave him permission to go to the office to call his mother. On the way to the office, the Police Officer on Campus assigned to Bonnabel High School, stopped him in the hallway and demanded a hall pass. J.H. did not have one. The officer followed J.H. to the office and began to harass him. He called J.H. a "wannabe thug" and an "asshole." The officer then told J.H. that he was going to jail. J.H. was afraid of going to jail and became emotional and upset. He told the officer that he "couldn't afford to go to jail." J.H. attempted to walk in a different direction and away from the officer. Moments later, the officer shoved J.H. against the wall and handcuffed him. He threw J.H. on the ground and began to choke him with both hands. After restraining J.H, the officer led him out of the school and placed him in the back of a patrol car. J.H. was never read his Miranda rights. Because of his age, J.H. was transported to Jefferson Parish Correctional Center, the adult jail, where he remained overnight.

J.H. is a special education student who experienced serious academic and learning difficulties at Bonnabel High. He was embarrassed about being an over-aged, eighteen year-old student in the 9th grade but was looking forward to catching up on his high school credits. He desperately wanted to earn a diploma. But the court fines and the exposure to the adult criminal justice system became more than J.H. could bear. He became frustrated and disengaged in his education. A few short months after the arrest, J.H. dropped out of school.

K.D.

K.D. is a fifteen year-old, African American male enrolled in the 8th grade at John Quincy Adams Middle School in Metairie, Louisiana. On November 17, 2011, a JPSO officer assigned to K.D.'s school subjected him to an unreasonable arrest and physical assault and battery.

That day, K.D. and a friend were engaged in horseplay fighting in their P.E. class. The teacher misinterpreted their actions for a real fight, and stepped between them. K.D. attempted to explain to the teacher that the two students were not fighting. The teacher refused to accept K.D.'s explanation and moved close to his face and began to yell at him. K.D. was then sent to the principal's office.

When K.D. arrived at the principal's office, he was visibly upset and began yelling at school officials. There were two police officers on campus waiting for him there, one male and one female. The male officer took K.D. to a back room away from school staff. The Police Officer on Campus grabbed K.D.'s left arm and pushed it behind his back. When K.D. asked what the officer was doing, he was told that he was under arrest for "assault on a teacher." The officer forcefully pushed K.D.'s right arm behind his back. K.D. heard a loud "pop" and his arm began hurting immediately.

After being transported to Rivarde Detention Center, K.D. complained of pain in his arm. Detention staff informed him that he could not be admitted until the Police Officer on Campus took him to the hospital. The officers shackled K.D.'s legs and injured arm and proceeded to transport him to the hospital. After an x-ray exam, a doctor advised K.D. that his right arm was broken. A cast was applied from above his elbow to his hand.¹⁷ K.D. reported that the two officers laughed about the incident as they transported him to Rivarde Detention Center.

After K.D. was released, the principal of Adams Middle directed his mother to keep him out of school indefinitely. He was never formally expelled or disciplined. Fearing retaliation by the officers, K.D. has not returned to school.

VI. THE DISPARATE IMPACT STANDARD

Public schools may not discriminate against students on the basis of race, color, or national origin. Title VI of the Civil Rights Act of 1964 provides that: “no person shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”¹⁸ The United States Department of Education has promulgated regulations pursuant to Title VI that prohibit recipients of its funds from taking certain actions to the extent that those actions have a disparate impact on groups protected by the statute.¹⁹

The language of Title VI's enacting regulations provides in relevant part:

(b)(2). A recipient, in determining the types of services, financial aid, or other benefits, or facilities which will be provided under any such program, or the class of individuals to whom, or the situations in which, such services, financial aid, other benefits, or facilities will be provided under any such program, or the class of individuals to be afforded an opportunity to participate in any such program, may not, directly or through contractual

¹⁷ Medical Records, Complainant, K.D., Exhibit 5.

¹⁸ 42 U.S.C. § 2000d

¹⁹ *Elston v. Talladega County Board of Education*, 997 F.2d 1394, 1406 (11th Cir. 1993).

or other arrangements, utilize criteria or methods of administration *which have the effect of subjecting individuals to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program as respect individuals of a particular race, color, or national origin.*²⁰

34 C.F.R. §100.3.

The explicit language of the enacting regulations makes clear that recipients are prohibited from administering policies and practices that have a disparate impact on groups protected by the statute. To establish liability under the Title VI regulations, a complainant must demonstrate that a facially neutral practice has a disproportionate adverse effect on a group protected by Title VI.²¹ If the complainant makes such a prima facie showing, the respondent bears the burden of demonstrating the educational necessity of their practices and must show that the challenged course of action is necessary to meet an important educational goal.²²

VII. JPPSS ADMINISTERS A SCHOOL ARREST POLICY THAT HAS A DISPROPORTIONATE ADVERSE IMPACT ON AFRICAN AMERICAN STUDENTS

School arrest data in Jefferson Parish overwhelmingly supports a finding that JPPSS's school arrest policies have a disparate impact on African American students.²³ During the 2010-2011 schoolyear, school arrests reportedly decreased, yet racial disparities among African American students remained constant.²⁴

²⁰ 34 CFR § 100.3(b)(2).

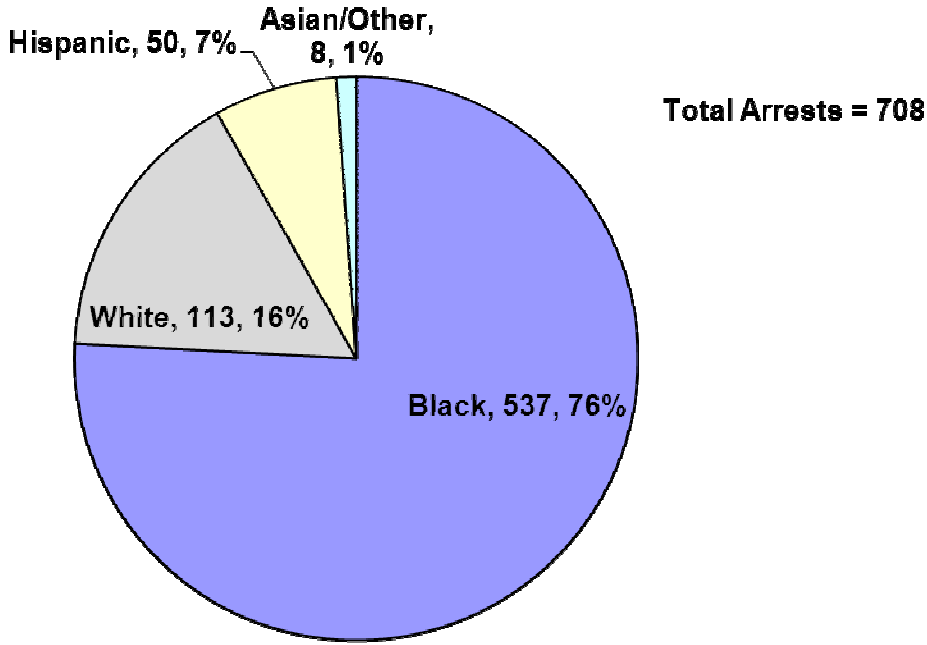
²¹ *Elston*, 997 F.2d 1394, 1407 (11th Cir. 1993) (quoting *Georgia State Conference of Branches of NAACP v. State of Georgia*, 775 F.2d 1403, 1417 (11th Cir. 1985)).

²² *Id.*

²³ Jefferson Parish School Arrest Data, Dept. of Juvenile Services, 2009-2010 and 2010-2011.

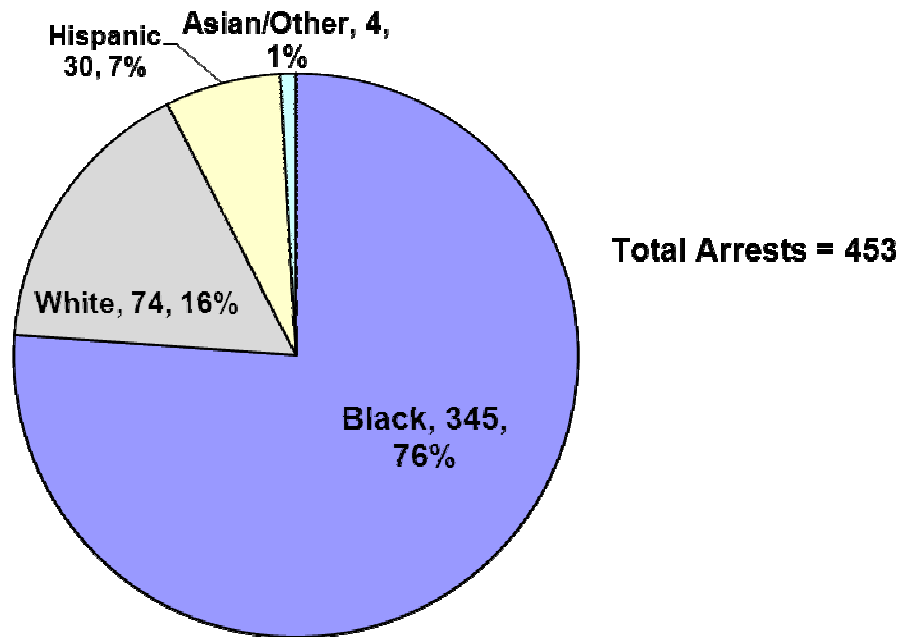
²⁴ *Id.*

**Graph 1:
Jefferson Parish Public School Arrests By Race
2009-2010**



Source: Jefferson Parish Department of Juvenile Services

**Graph 2
Jefferson Parish Public School Arrests By Race
2010-2011**



Source: Jefferson Parish Department of Juvenile Services

In effect, JPPSS has relinquished its authority to handle school discipline matters, choosing instead to rely on Police Officers on Campus as de facto disciplinarians. The POC agreement with the Jefferson Parish School Board states that POCs “shall not act as a school disciplinarian” and “[d]isciplining students is a school responsibility.” However, there are many minor, non-violent student misbehaviors outlined in JPPSS’ discipline code, intended to be addressed by school personnel that are being effectively and inappropriately criminalized by POCs particularly when it involves African-American students. Respondent JPPSS has failed to provide clear guidance for school officials and police officers on campus, leading to arbitrary and subjective decisions about school arrests that vary at each school campus. “Absent clear guidelines, there may be confusion or disagreement as to whether a food fight in the cafeteria amounts to criminal ‘disorderly conduct,’ whether talking back to a teacher constitutes a criminal

'disturbance of school or public assembly,' or whether a shoving match should be classified as a criminal 'assault' or 'simple battery.'²⁵ As a result, Respondent JPPSS' facially neutral arrest policies and practices have a discriminatory effect on African American students.

It is well documented that schools with [police officers on campus] are more likely to have arrests for minor offenses.²⁶ Complainants were arrested for non-violent behaviors that were clearly anticipated in and governed by Respondent JPPSS' discipline code. K.S. was cutting class when she was stopped at school by a police officer on campus. R.S. possessed a cell phone on school premises. J.H. was walking in the school hallway without a hall pass. K.D. was engaging in play fighting in his gym class and allegedly used profane words against school officials. In each instance, Respondent JPPSS did not demonstrate a legitimate need for police officer intervention, given the fact that there were more appropriate disciplinary remedies outlined in Respondent JPPSS' code of conduct. Significantly, during the past two years, the majority of all Jefferson Parish school arrests were classified as non-violent or misdemeanor offenses.²⁷ Approximately 70% of these arrests were dismissed, refused, or diverted by the courts.²⁸

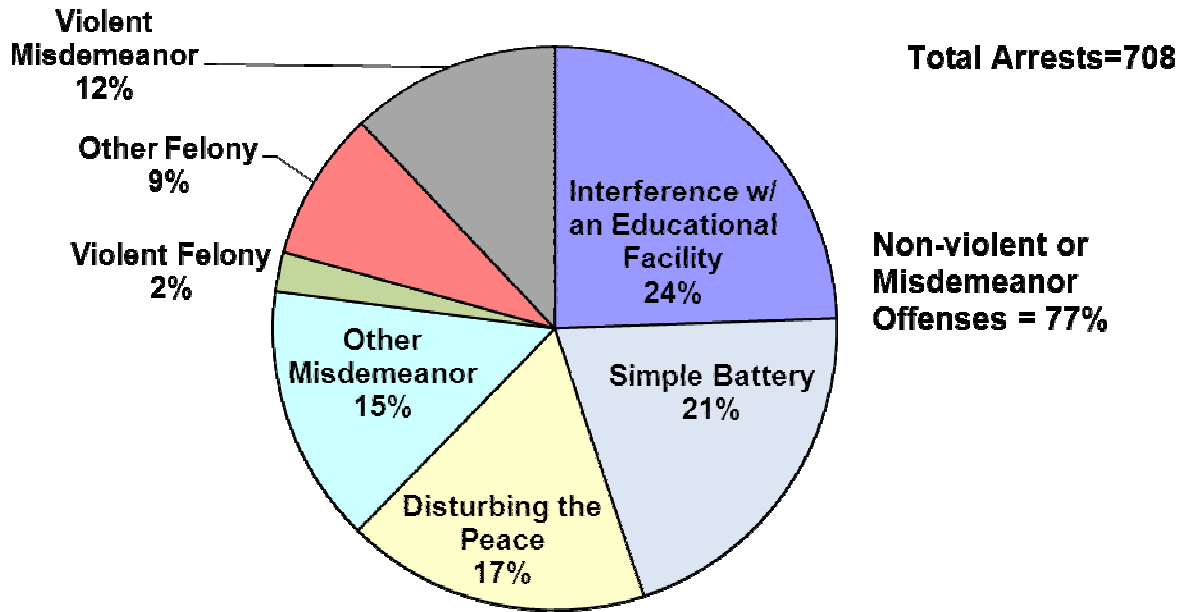
²⁵ *Policing in Schools: Developing a Governance Document for School Resource Officers in K-12 Schools* (ACLU, New York, N.Y.), August 2009, at 6. (quoting Matthew T. Theriot, *School Resource Officers and the Criminalization of Student Behavior*, 37 J. OF CRIM. JUST. 280, 280 (2009).

²⁶ *Education Under Arrest: The Case Against Police in Schools* (Justice Policy Institute, Washington, D.C.), November 2011, at 15.

²⁷ Jefferson Parish School Arrest Data, Dept. of Juvenile Services, 2009-2010.

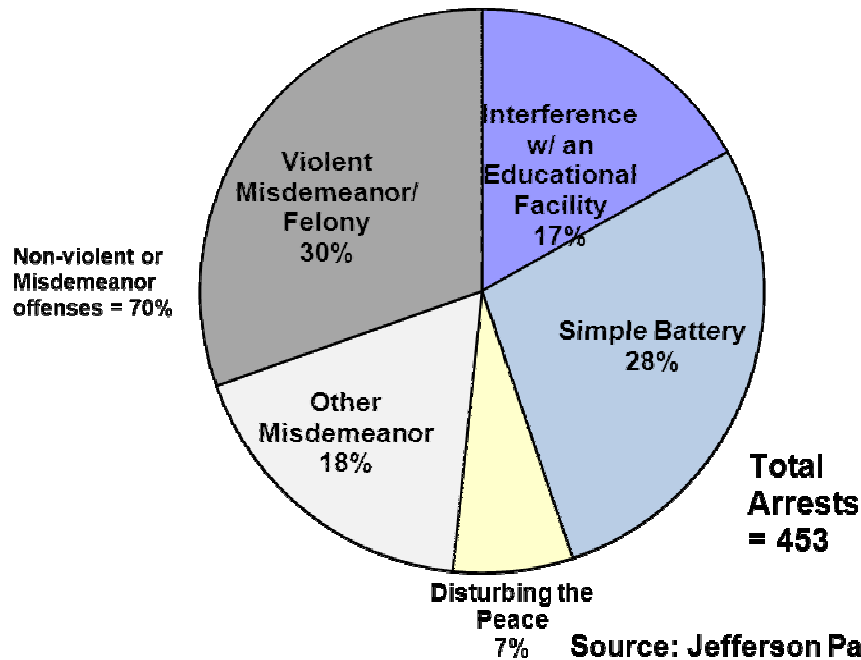
²⁸ Jefferson Parish School Arrest Data, Dept. of Juvenile Services, 2010-2011.

Graph 3
Jefferson Parish Public School Arrests By Offense
2009-2010



Source: Jefferson Parish Department of Juvenile Services

**Graph 4
Jefferson Parish Public School Arrests By Offense
2010-2011**



African American students in Jefferson Parish are disproportionately subjected to the life-changing adverse effects that accompany an arrest. Even if charges are dismissed or refused by the courts, a school arrest causes an array of collateral consequences that can impact a student’s life well beyond the classroom.²⁹ Students may be suspended or expelled as a result of an arrest, even when the criminal charge is not well-founded. Both suspensions and arrests are intrinsically linked to school dropout and diminished academic performance.³⁰ Each year, 16,000 Louisiana public school students drop out of school.³¹ Only 62% of Jefferson Parish students graduate in

²⁹ *Education Under Arrest: The Case Against Police in Schools* (Justice Policy Institute, Washington, D.C.), November 2011, at 17.

³⁰ *Id.*

³¹ Louisiana Department of Education, Data and Reports: http://doe.louisiana.gov/topics/dropout_rates.html.

four years.³² These collateral consequences are illustrated by the experience of the Complainants. K.S. and R.S.'s grades are suffering. J.H. has dropped out of school, and K.D. has not returned to school since his arrest. The decision to arrest a child often has very long term adverse effects for the trajectory of that child's life. In Jefferson Parish, these arrest policies are significantly disproportionately impacting African American children.

In addition, it is well documented that youth involved in the juvenile justice system have an increased chance of incarceration as adults.³³ African American students, such as the Complainants, suffer ongoing harm as a result of their disproportionate and early exposure to the juvenile justice system. These students fall behind in their studies as a result of missed instructional time and suffer social alienation and stigmatization from their peers.³⁴ Because the bulk of Jefferson Parish school arrests are for non-violent and misdemeanor conduct, many of these behaviors could and should have been resolved through JPPSS' discipline code procedures without resorting to law enforcement intervention.³⁵ A shift away from a punitive law enforcement model and toward the implementation of graduated responses to student misbehavior would reduce the number of arrests made in schools and prevent the resulting harm to Complainants and their futures.

VIII. CONCLUSION

Based on the foregoing, the Complainants again ask the Office of Civil Rights to: (1) Accept jurisdiction and fully investigate these claims; (2) Compel JPPSS to overhaul current school arrest policies and practices; (3) Ensure that African American students are not unfairly

³² Editorial Staff, "Expanding reforms in Jefferson Parish schools: An editorial" Times-Picayune, September 24, 2011, http://www.nola.com/opinions/index.ssf/2011/09/jefferson_parish_needs_to_keep.html.

³³ *Education Under Arrest: The Case Against Police in Schools* (Justice Policy Institute, Washington, D.C.), November 2011, at 18.

³⁴ *Id.* at 17-20.

³⁵ JPPSS, 2011-2012 Procedures and Policies for Parents and Students, at 10-13, Exhibit 6.

targeted for arrests; (4) Monitor and track all police incidents and arrests in Jefferson Parish public schools; and 5) Mandate that JPPSS implement alternative discipline strategies to reduce law enforcement interaction with youth and arrests on school campuses.

Dated this 11th day of January 2012.

Respectfully submitted,

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