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**LDF, Arnold & Porter File Title VI and Title IX Complaint on Behalf of Southlake Tx.
Parents, Students**

Today, the NAACP Legal Defense and Educational Fund, Inc. (LDF) and co-counsel Arnold & Porter submitted an administrative complaint with the Department of Education's Office of Civil Rights (OCR) on behalf of two organizations, Cultural & Racial Equity for Every Dragon (CREED) and the Southlake Anti-Racism Coalition (SARC), as well as individual students and their parents. The complaint alleges that Southlake, Texas's Carroll Independent School District (CISD) fails to ensure that students do not experience a hostile environment because of their race, sex, or gender identity. There are three *pro se* administrative complaints against CISD already pending with OCR.

CREED is a group of parents of Black Southlake students who are concerned about the emotional and mental harms inflicted on students by CISD's hostile environment. SARC is a group of current and former CISD students who have first-hand experience with the harmful consequences of the hostile environment detailed in the administrative complaint. The complaint seeks relief under Title VI of the Civil Rights Act of 1964 and Title IX of the Education Amendments of 1972 for the pervasive hostile environment in CISD schools. The individual complainants have been harmed by direct harassment that CISD officials failed to appropriately handle, as well as the hostile environment in CISD schools.

"For years, CISD officials have known that the hostile environment in the Carroll Independent School District prevents students of color and LGBTQ+ students from fully participating in educational programs and school activities," said LDF Assistant Counsel Cara McClellan. "Despite this knowledge, students who tried to alert District officials were not supported but instead were subject to yet more slurs, threats, and demeaning treatment."

"CISD has shown a consistent and continuous pattern of egregious indifference to the harassment of students on the basis of their race, color, national origin, and sex in violation of their duty under federal law," said Arnold & Porter Partner Raqiyyah Pippins. "Given the documented, research-backed link between fostering a more inclusive school environment and improving students' academic performance, this dereliction of duty must be rectified. All students deserve a safe place to go to school."

"As a longstanding member of this community," said CREED member Russell Maryland, "I was appalled by the dismissive attitude of CISD officials when they were alerted to this shameful situation. My profound hope is that this complaint will finally wake CISD up to the reality that ensuring a safe learning environment is not only their moral responsibility but also their legal obligation."

“We current and former students of CISD schools are tired of having our lived experiences ignored, demeaned, and invalidated,” the members of SARC said in a joint statement. “SARC is committed to standing up against the injustice that has persisted in our school district for decades; and, as a complainant on this filing, we are standing firm in our belief that students deserve an equitable, affirming, inclusive, and safe learning experience.”

[Read a summary of the filing here.](#)

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Founded in 1940, the NAACP Legal Defense and Educational Fund, Inc. (LDF) is the nation’s first civil and human rights law organization. LDF has been completely separate from the National Association for the Advancement of Colored People (NAACP) since 1957—although LDF was originally founded by the NAACP and shares its commitment to equal rights. LDF’s Thurgood Marshall Institute is a multi-disciplinary and collaborative hub within LDF that launches targeted campaigns and undertakes innovative research to shape the civil rights narrative. In media attributions, please refer to us as the NAACP Legal Defense Fund or LDF. Follow LDF on [Twitter](#), [Instagram](#) and [Facebook](#).

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