



cerca y Aican Aican d n n a o r a y 4 o d n  
 o a on y co r n a y o a a o a n a r c h o d n h  
 d a r r n a o r a y o d n o a on <sup>2</sup> y co r  
 a o r a y 2 o a a o a n a r c h o <sup>3</sup> h a r a n h o a y o Aican  
 Aican d n and d n h d a r r n a n a n a r c h o r r a y  
 d o o r o n a h n c o a d o h h o n o n d a d h a r a n h o a y  
 n a n a r c h o o Aican Aican h h c h o d n r 3 d a y a  
 c o a d o a n a r a n h o a y o 4 4 d a y o h h h c h o d n 4 h a r a  
 r

na d d n a n a d a n c b o a d a n n o n a h c  
c b o

r r a y h a d o a o r a y d c a a n d v d n h





... a h n y a o d A r c a n A r c a n d n a n d a d n u h a d a r r y  
d n r d n d h A r c n y n o d n h h a d a o h M a y n A n a r y  
c h o a n a n a r y c h o o a d y

... A r o n y a o d d n u h a d a r r y d n r d n d h A r c  
c n y n o d n h h a d a n d r c r y n h o n d r c a n o a c h a n o  
a e n r d y n h a d a y ... A a a d n a a a a n A n a r y  
c h o a n a n a r y c h o o a d y

#### IV. Respondents

... o n d n ... o n a r h r c c h o y ... h o c a d c a r o n a  
a n c y L A ... o n r o h a d r n r a r o n a n d o a r o n o ... o n a r h r c  
c h o n d h o r n a n c o h ... o n a r h r c c h o B o a d B ... a  
c r n o d a n a n c a a r a n c o a n a o r a y 3 r o n 4 o a  
c h o n h d r c r n c d n r y a n a r y c h o c a A n a r y c h o ... o n  
e o n y c h o o h M a y n A n a r y c h o ... a a h a n A 4 n a r y o n 3 4 4 3 o o 4 3 o 3 a 3 4

**V. Facts Relating to the Complainants**

**J.P.**

... a ... ny a od A ... can A ... can ... d n and ... d n ... had a ... y ...  
c ... n y no d ... n ... h ... h ... ad a ... nd M ... dd ... c ... bo ... n ... h ... on a ... h ... c ...  
c ... bo ... y ... a ... d n ... d a ... d

d n and o h n a a h h b a d o o h h A n d o  
 an e o n y c h b o a o o c h b o o o y o a a o  
 a c o d a y n d n n y n o a n a y c h b o a n d d a n e o n y  
 c h b o o a o a y o n h o a n a y 2 h o h h n d o o y 2  
 c a h a n a o h a n a y c h b o o a a a o n o c h b o  
 r c o n d c c h a d c h a y o o o a n y d n c a a n d h a y  
 h a h a n a y c h b o h a c o o h o o c h b o n o n o n o  
 c h b o h a y o a c c n 2 d a y o r d n c r o n a a n a y d o  
 h a n a y c h b o o a a a n e o n y c h b o o n h d n a n o n o  
 h n y o c a d c a r o n y c n d h A h a n e d  
 n a y c o n n e a a o h o o n d a y n a n a y c h b o n e d n  
 o n n n c a n y o a d y a n d c r n n a n a c o y a d n a o h  
 a c a d r e c o a n d M d d c h b o

**C.B.**

e B a n n y a o d A r c a n A r c a n d n and d n h a d a n y  
 a n o d n h h a d a o h M a y n A n a y c h b o n n A 2 2  
 h n h h o c h b o e B r d n r d a a d n h o r o n a d a n n a d  
 o n h c n c a d a n o o d r o n a n y A r c a n y h a y o a n d o o r o n a  
 d r a n d o d

A c c o d n o h h n d y d a z d d c a r o n o a e B a d o o h  
 M a y n A n a y c h b o o n A 2 o a h o y o n o y n a h a y o h a d  
 d c n a y a a h a c h b o a c n o r n c a d c o a h b y

---

an e o n y c h b o a n a o o y d h c a d c a r o n y c a n d h a h o  
 a n r o n d a c o h a c h b o a c n a n d M d d c h b o o n o a o n d c 2





**D.S.**



inclusion of a racial or ethnic group and the inclusion of any other group in a plan.

## VI. Discrimination on the Basis of Race

### A. The Disparate Impact Standard

The Equal Employment Opportunity Commission has held that a facially neutral employment practice that has a disparate impact on a racial or ethnic group is unlawful if it is not justified by business necessity. The Commission has also held that a facially neutral employment practice that has a disparate impact on a racial or ethnic group is unlawful if it is not justified by business necessity and if it is not the least discriminatory alternative available. The Commission has also held that a facially neutral employment practice that has a disparate impact on a racial or ethnic group is unlawful if it is not justified by business necessity and if it is not the least discriminatory alternative available and if it is not the least discriminatory alternative available.

The Commission has also held that a facially neutral employment practice that has a disparate impact on a racial or ethnic group is unlawful if it is not justified by business necessity and if it is not the least discriminatory alternative available.





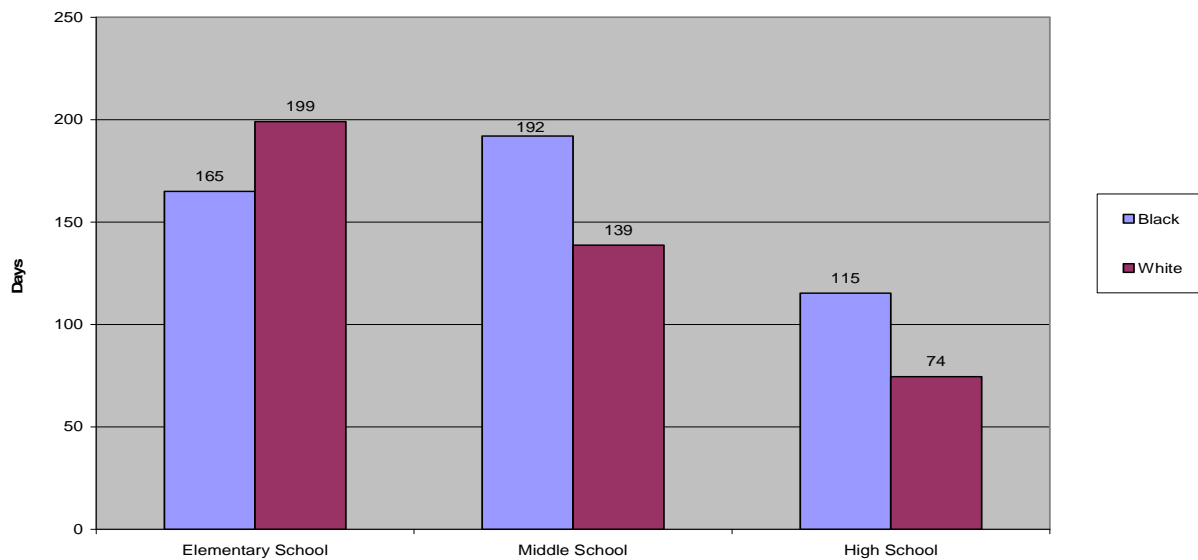
o. n <sup>22</sup> 6 h o. n o r. d o d n e A rcanA rcan. d n c r. d  
a. o a. n a r. c h o c o a d o 4 h. d n 6 h o. n o d. c. o  
a. h o. y 4 A rcanA rcan. d n c r. d a. o a. n a r. c h o c o a d o  
4 h. d n 6 h o. n o d. c a o h a. a. o a. o n o c h o 4  
A rcanA rcan. d n c r. d a. o a. n a r. c h o c o a d o h.  
d n <sup>23</sup> 6 h o. n o a. o a n a n d o o c n a n a A rcanA rcan  
d n c r. d a. o a. n a r. c h o c o a d o h. d n <sup>24</sup> A n d o h  
o. n o r. o a a c r. 3 A rcanA rcan. d n c r. d a. o a. n a r.  
c h o c o a d o 3 h. d n <sup>2</sup>





o, h, a c h o h a, n n o o n, d o n a h d c o n o. a h and  
 ad, n, a o a h a, n a, r, c h o and a a. A, r, c a n A, r, c a n d n a  
 n y n a o a n n o h d c o n a y o n o a d a y a y, h c, r, a o a n  
 h, a y a o, h a c a o o n, a d, h y a a h b d, n, h a, n a, r, c h o  
 o o n h o y a h a d a y, d o n, a d, n, h d, r, c a, n a, r, c h o  
 n h o a y d a a c a y h a, a n h o a y o A, r, c a n A, r, c a n h h c h o  
 d n n a, n a, r, c h o, 3 d a y a c o a d o a n a, a n h o a y o  
 4.4 d a y o h h h c h o d n h a, a n h o a y o A, r, c a n A, r, c a n  
 r d d c h o d n n a, n a, r, c h o, 2 d a y a c o a d o a n a, a  
 n h o a y o 3 d a y o h r d d c h o d n

**Graph 2: JPPSS Alternative School Length Of Stay By Race for each School Level**



Source: Jefferson Parish Public School System, Exhibit 1

A h a o, r d a d o n a h o n d n a c a y n a a, n a, r, c h o  
 a, n a, r, c h o n and n o, r, c h o and a c, r, h a, a d c, r, m a o y, c o n A, r, c a n  
 A, r, c a n d n h, d o c n d n n a o n a d h a A, r, c a n A, r, c a n d n

... n y a  $\mathbb{h}$  n o d e r o n a y d e r n ... a and a ... y o c r y o  
 n n con n e n c o n c ... d o  $\mathbb{h}$  c h o o r c <sup>2</sup> n a d d r o n a c ... d n a a o  
 } ... o r y o ... d o c h o  $\mathbb{h}$  a n  $\mathbb{h}$   $\mathbb{h}$  c o n a <sup>3</sup>  $\mathbb{h}$  d a r y  
 n ... d e r o n a y d e r n ... a r d o n a d y e o a n a n e B and  
 e o a n a n e B a n r n o r d n a n y r  $\mathbb{h}$  o a o n a c r o n ... a n o a  
 a n a r y c h o o o  $\mathbb{h}$  a  $\mathbb{h}$  d e r c d e r n d a n o r n a  $\mathbb{h}$  a o r n c d n  
 r n c a d e c o a  $\mathbb{h}$  r y and n o a n y r r a y a n o a n  
 a n a r y c h o o n ... o c c a r o n o n o r n a and n a o r a  $\mathbb{h}$  a o r n c d n  
 d o y n c a o o and n o o o r n d e r o n n a c h n a n c c o d  $\mathbb{h}$  a r  
 r i z d o a o r a c o c r y d d r



are directed to the American A... can be... and... n

**VII. Discrimination on the Basis of Disability**

**A. Section 504 of the Rehabilitation Act and Title II of the ADA Prohibit Discrimination on the Basis of Disability**

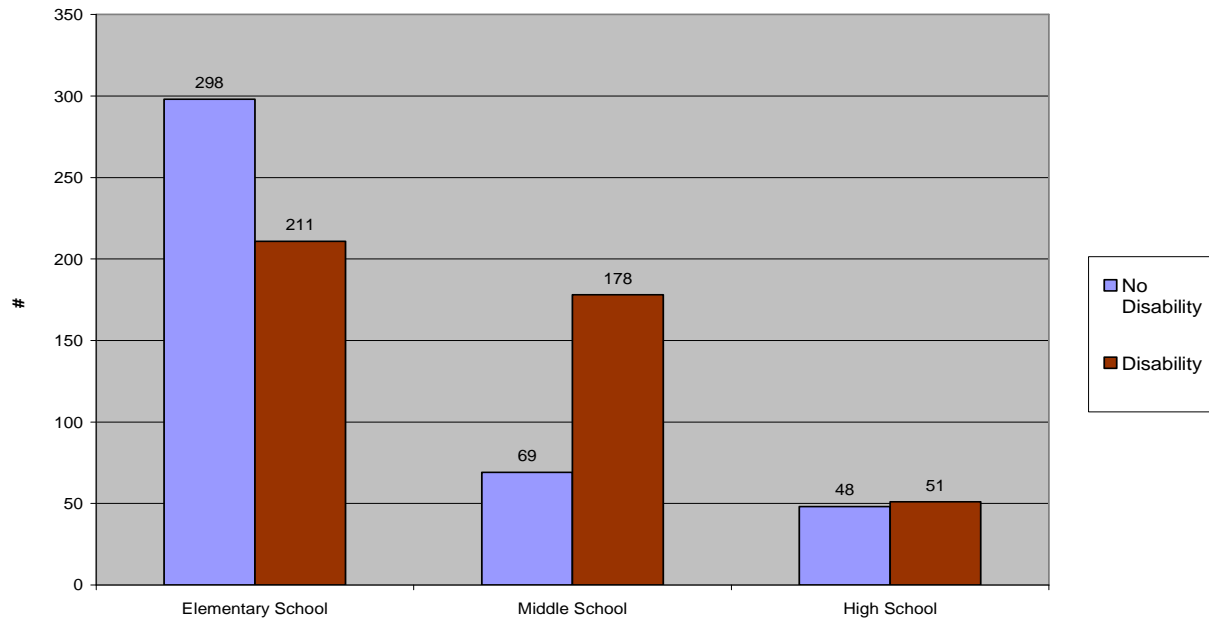
En... on... a... n...  
... 4<sup>3</sup> and na

o a o a y y h c o h and ca d on o m h a  
a h d c r n a r o n o a n o h c r n r o h c r n a  
c o c o on ad n r a r y con o o a a n c o h a  
a

h h o c a h a h o o o h c r o n 4 and r o h A A r n o o  
o h n n r o n a d c r n a r o n y h c h o d r e c a a n d n r h d a r r  
A h r c a n a o h n a c r n a r o n a c a c h o d r e c a c r n o  
d a r n a n c a a r n a n c a o r d d n o r n h b d o a d n r a r o n r h a h a h  
c o h



**Graph 3: JPPSS Alternative School Referrals By Disability for each School Level**



Source: Jefferson Parish Public School System, Exhibit 1

d c r onay a o r c r c h o a d n r a o a n d o h  
 o n n o n a a y a d n r h a d a r r y o h a n a r y c h o r h b a d  
 o h d n n d r d a z d d c a r o n o a a c n o a c c o o d a r o n  
 n h a a a d c a h d n h a h r d a a n o c h o r c o n d c  
 h a r r y a d o h d n d a r r y n a d o o r d n r n c a d h a r o o  
 o d n r h d a r r y d r o n o a n d n a r n c r o n a B h a r o A n o  
 B h a r o n r n o n a n d n r h d a r r y o h d r c a n a r y

hd a... a... do h d... a nar... cho a a a n a ha... na  
d... naoy... con... dn... hd a...

a... o... y... h n a a c h a n o a c n y a n h a... a o  
h a. nar... cho a a c h a n n h... dn... cho... no a c h a n o a o... c...  
a c n... h a. nar... cho n... a h h y... c... n... h... dn...  
hd a... a no... o... d d... h... a d c a r o n a o o... n... a c o... a d o... h... a  
d c a r o n n... on n no a... h y... o... d d... h... n d... d a r z d d c a r o n a o a... n... h y  
a... n... d o n d... c r o n 4 o... h... h... a... r o n A c... h... d c a r o n a o a a... h  
d... c... a... nar... cho... r a o n... z... a... o a... h... y... d n... a c d... n... on  
o a c o... c... n a d a y o o... h o... h a... r... o... o... on n a d... r e c o... a d



h, ay æ o h a ca oo n n o a on o h a a c a y  
 n on n o on o c on 4<sup>4</sup> d n h d a r r h b a d o h  
 d r c a n a y c h o a n a o a y a n a y c h o o o c a n d a a  
 a a h d n h a n a y c h o o o n h o y a a a h  
 d c r n a o y c o n d n h d a r r d o n a d n h d r c a n a y  
 c h o n h o a y d a a c a y h a a n h o a y o d n h d a r r  
 n a n a y c h o , 22<sup>3</sup> d a y a c o a d o a n a a n h o a y o 4 d a y  
 o n o n d a d d n <sup>4</sup> A h n a y c h o y d n h d a r r a n h a  
 a n a y c h o o a n a a o d a y o n

h d c ancy, ca d y d n o y. oicy h c r a y  
h c h d n a h a n a r c h o a n h, a y o o h a n a r c h o a n a c  
o h, a d c a r o n a n n <sup>4</sup> h o r c y h a h o h a v o a n a n a n d a  
d n c a n n o o o o n o h n n h y c r a c a n n o o n y  
o n c r c c o r a n c h a v o o a a r c a n o c o n c r r d a y h a  
d n a h o o o n a n n o n a d o n o o d h a v o a n d h n h a a

acron in a, h and an an a. na, c, bo a and  
o, c h, h, h, c, o, d, c, r, n, a, n, a, a, n, a, a, d, d, n, h, d, a, r, r,  
o a cron 4 o h, h, h, a, r, r, a, r, o, n, A, c, and

... a ... h ... n ... ho ... an ... ion ... and ... h ... n ... ho ... ay ... o ... A ... can ... A ... can ... d ... n ... and ... d ... n ... h ... d ... a ... r ... a ... a ... n ... a ... r ... c ... h ... o

a d ... h ... day o May 2 2

... c ... y ... d  
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... an ... LA  
4 4 ... 2 ... bn  
4 4 ... 4 ... a

## **EXHIBIT INDEX**