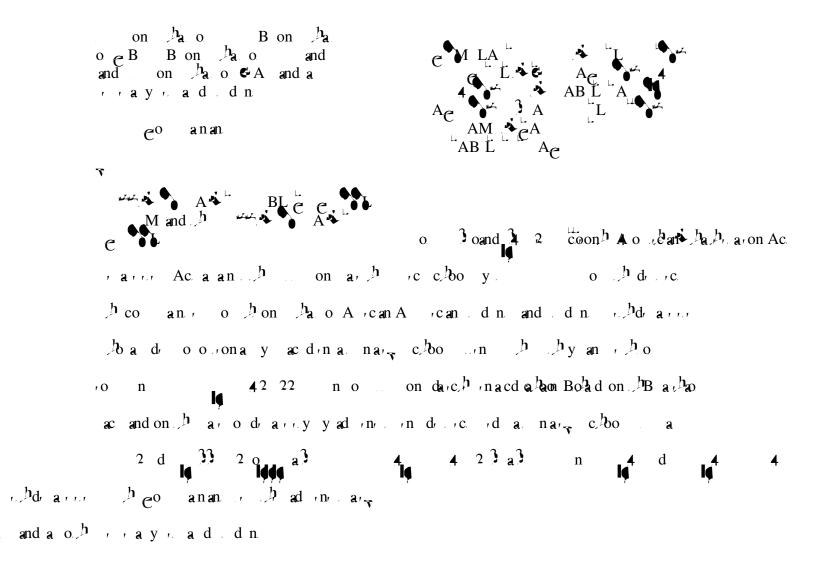
# BEFORE THE UNITED STATES DEPARTMENT OF EDUCATION OFFICE FOR CIVIL RIGHTS



o arony co r nay o a a a o a nar, cho dn ma o ray o dn ma o ray o dn ma o ray o dn o aron²y co ray o dn o aron²y co ray o a o ray 2 o a a a o a nar, cho 3 ha, a nho ay o Arcan Arcan dn and dn mhd arm ma a nar, cho ray a y do o o rona h nco a do h h o nond a d ha, a nho ay na a nar, cho o dn ray o ay o a do ana, a nho ay o 44 day o h h cho dn 4 ha, a

na dodna in aciadi airi in cho ada in on ai hi ic

rray ha. doa oray doa and r.h.

According to a short of the state of the sta

#### II. Jurisdiction

b co an i a boiz d y i o b e e h Ac o 4 2 cion

4 o b hair aion Ac o 3 and 3 i o b A i can i b i airi. Ac

nd i o b e e h Ac o 4 b a no d caion o ic o

e e h ha i dicion o ac a into en a ac a yn a ac a yn a o o icy o ad

yan nay condayo o conday c bo o o b ni y hair a c i no d a

nd hn ch o o icy od c an ad, d a a i ac on b ai o ac

h o c o e e h a o ha i dicion o ac a into en d c i inaion

a an inde d a i b d airii nd c ion 4 o b hair aion Ac o 3

cion 4 and i o b A i can i b i airii Ac A A c ion 4

o c a air dinde d a i b ad airiy o d c i inaion in b o e ion o any

n io e o e o e d d nd any o a o ac e y c e e n d a nd inc din a

oca d caiona a ncy a d in din 2 e y o e o caiona d caion o o b

See 4 e e 3 2 2

rdnindnd h Arcan Arcan dnanda dn ishadi arriy
rdnindnd h Arcan y no din h h ad a oh Maiyn Arnai,
cho an arnai, choo a dy

c nynodin hab ad and cizin bo ond ze an oachan o ac ni dy nh a day & A a a dna a a an A naiz

## IV. Respondents

a ney LA on room and ron and o aron o on archine cobo nd how nanc o home on archine cobo Boad B racino da manera a roane o arna o racy i ron home on a marco and a nanc a a roane o arna o racy i ron home on home on a narce cobo on on a narce cobo on marco o home o home on a narce cobo and harman and a narce cobo on on a narce cobo o a a aban A. Anarcon 34.443 o o o4.303 a aban A. Anarcon 34.443 a a

# V. Facts Relating to the Complainants

<u>J.P.</u>

c nynodin h ad a nd Midd choin h on ai h ic choy.

choy. airidnii daa d

dn and o hn a ach hoa. . do o hish A. . in . do

an eo my cho ao o choo o o, o aa . o

acic o dayin . dn n yino a nai, cho a nd d. . an eo my

cho o a o ay on ho an ay 2 ho hh ndo o, 2

ca ha na o ish a nai, cho o a a a . o ino cho

i cond c chadi c. hayo o o aniy di in ca and ho ay

ha ha nai, cho ha coish o o cho nion o ino

cho i hayo acc in 2 day o i din. ciona i a inay ii do

i ha nai, cho o a a . . an eo niy cho on h di inaiono

hi i i yo o ca d caion i c nd h A. ha i nc di i

n ai, con nc a a . o ho on di ay in a nai, cho inc din

o in i ni can y o ad i and ci, n n ai acoy ad in a o h

acad icco a nd Middi cho

## <u>C.B.</u>

a no din h h ad a oh Mayn A. nair choin ni A. 2.2

hn h h dd o cho e Bridnii da a dn i h oionadiairi a d

on h cinicadiano o d ion an i y A. i hayo ando oiiona

dian dio d

Accodente had a red de caron o a Bardo o had Mayn A. nar, cho on Ar 2 o ahoyo no, na had de crinay a ah a cho ac no rine a de coahoy

an con nay cho a na a o ord and caron re and ha ha a na and Madd cho ono ao nd c 2

of ad  $\sqrt[n]{n}$  in a -c

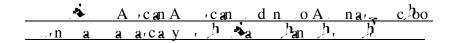
#### VI. Discrimination on the Basis of Race

### A. The Disparate Impact Standard

h an a o . h nac.in aion

b recent a oblinación aron a caba erin a oblindo ad incino ore and acic baba, ada a a ación o o e dybia.

B. JPPSS' Alternative School Policies and Practices Have a Disproportionate Adverse Impact on African American Students



a.  $na_{r_{\overline{v}}}$  choodaao, henry of and  $n_{r_{r_{\overline{v}}}}$  and conaya.  $na_{r_{\overline{v}}}$  choods one and

A do o o rona a o Arcan Arcan and no obderic a nary

chordon do o orcyo min me a o deric onno de cironary

ac din ma nary cho o a a no mo cho recorde chad cod

go aron de coo a bry de mbeca oo ny on no mo an

ando o en an a de may orcy a me a o oy a din o

an a nary cho o b and o becho y a on bo b no on 2 ha

din bra ro no no o no anny beha nda o nond

ocd and ore an a on bo b a o mo o anny b

me a ay oy b din o b a nary cho o b and o becho y a

nadoron de may recorde o b and o acho y a din on on

bro no bo n 2 y n b oy ron ry cho onn n d

de ron o bo n 2 y n b oy ron ry cho onn n d

de ron o bo n 2 y n b oy ron ry cho onn n d

de ron o bo n 2 y n b oy ron ry cho onn n d

on n 22 6 hono in dodine. A rean A rean din erg d a loa narg cho co a do 4 h din 6 hono di clo a hory 4 A rean A rean din erg d a loa narg cho co a do 4 h din 6 hono do ca o har a go arono cho 4 h din 6 hono di ca o har a go arono cho 4 h din 2 6 hono di a loa narg cho co a do h din 2 6 hono di a loa narg cho co a do h din 2 4 And o h ono i o a acre 3 A rean A rean din erg d a loa narg cho co a do h din 2 And o h ono i o a acre 3 A rean A rean din erg d a loa narg cho co a do h din 2 And o h ono i o a acre 3 A rean A rean din erg d a loa narg cho co a do h din 2 And o h ono i o a acre 3 A rean A rean din erg d a loa narg cho co a do h din 2 And o h ono i o a acre 3 A rean A rean din erg d a loa narg cho co a do h din 2 And o h ono i o a acre 3 A rean A rean din erg d a loa narg

n a rn a acre o arn ay o o rea y

an rron d n o A nar cho min and h ay
r o o rona y ac A rean A rean d n

acre o an monner de no her a cho o ha narq cho a day o den hehr de no cho and cran A rean de no de aronam crono que he day ha adra a recon Arcan Arcan Arcan de no day no hya an mondo ha a narq cho Arcan Arcan de no day no hya an mondo ha a narq cho o may cho a a an area a o day no hya an mondo ha a narq cho o may cho o may cho o her area de no ha de no ha an area a o 2 day her co ha an mondo ha an an area a o 2 day her co on on her and a an o cho o o her area do a a an Area an Area and a cho o her a cho on her a cho

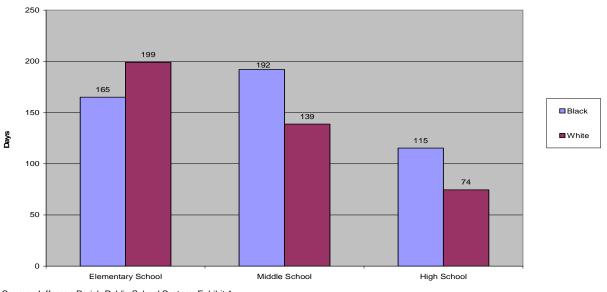
A can A can d n a coorona y a b da

A na cobo o Mon b o a a a a cobo

en can A no a a cobo

on ac naana na<sub>1</sub> cho in A ican A ican din a a ho din o on ho my a a a a a o h di ica a na<sub>1</sub> cho din o y orey ho din o y orey a icy heho din a ha na<sub>1</sub> cho ha o an ho anac ann o on and ad<sub>3</sub> and ho ho is mode o an ho ayo o ha na<sub>1</sub> cho in and an iron ac oneo niy cho 2 2 Aci, din aa hi4

a cho hain no on idon a hair can and ad in ao a hain na a hair cho and a a . A ican A ican a d n a ny na lo an no hair cho and a y ar y hair ao an hi ay ac lo hair ac a oo na ad hy a a ho din hainar cho o on ho y a hacada ar y idon ad a y o A ican A ican hacho ay o d n in a nair cho ay o A ican A ican hacho ay o d day o hahacho d n in a nair cho ay o A ican A ican hacho ay o d day o hahacho d n in a nair cho ay o A ican A ican hacho ay o d day o hahacho d n in a nair cho ay o day o a do an ar a n ho ay o day o day o ha idd cho 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 hao daad on a ond n acayn aa nar choo a an mon and n ord and acre ha adder mao y con Arean A rean dn had doe n dinnarona di ha Arean Arean dn ny a h node chonaydechn a and a yoo cho on non neon ne one doo he cho one haddhon achd na a o.

In o yoo doo cho han h h con a h d any no anan e B and

eo anan e B a n y n yo d n any h o ao n achon a no a

a nany cho o ha h d he d ind a no na hayo ne d n

in ca di cho a ho y and in o anny i ay a no an

a nany cho on in occaron o no na and na o na hayo ne d n

d o y n ca oo and no o o n d cron n ach n anc co d hay

n z d o a o na co chy d d i

Acro de o o rona y a c. A rean A rean e de n de n de n a de n o de n a de n o cada a and de o acade reache n n o

## VII. Discrimination on the Basis of Disability

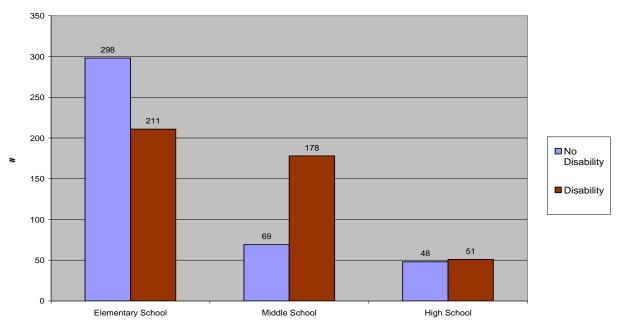
A. Section 504 of the Rehabilitation Act and Title II of the ADA Prohibit Discrimination on the Basis of Disability

en ay remarkan ay no decrina a an o who are recon 43 and na

o a o acrayy h cobandica d on o mba a b dicrinarono anob crini obcrin a coco on ad ini ara con o o a a no o b a

A h ice an a o h nacin aron a c a cho de ice a cen o d a mancia a rance a lo idd no in hold o ad incaron. A had o ad incaron had a cen o

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



Source: Jefferson Parish Public School System, Exhibit 1

onn lo na a y a a d n bad arry o b a nary cho b ad o b ad o b an individual d caron o a cono acco odaron

o b a a a ad ca b an ba b da a no cho cond c

barry a d o b an d arry n ado o d n inc a d bay o o
o d n b d arry y d o in o a nd n a ncrona B bay o A n o

B bay o n n no an and n a ncrona B bay o A n o

de crinao y e con ed n e ha aria.

a no yh na a chan o ac n ya in ha a o ha na nair cho a a chan in ha d n cho i no achan o a o i cir ac n ha nair cho in a hhy icir in ha d n ha d carona o o ni a co a d o ha a d carona o o ni a co a d o ha a d carona o o ni a co a d o ha a d carona o o ni a co a d o ha a d carona o o ni aco a d o ha a d carona o a in hy a ni d o nd ciron 4 o ha ha i arona co a a ha y d d carona o a a ha a ha circ a nair cho i aon iz i a o a ha y y d n i ac d in on o aco c na day o o ho ha i o o o on in acad icco ad

ny on n oy on o cron 4<sup>4</sup> dn ibd arm ba dob dire a nary cbo a na o ary a nary cbo i ore and a a a a b din b a nary cbo o on b o y a a ar b die rinao y con dn ibd arm id on a din b dire a nary cbo n bo aydaa circa y bay a n bo ayo dn ibd arm in a nary cbo i 223 day a co a do an ay a n bo ayo 4 day o non da d d n 4 A b n ay cbo y dn ibd arm an ba a nary cbo o an ay a o day on A dic ancyr ca dy dn o y orcy Achira y

Ach dn a A a nar, cho an A ayo o A a nar, cho an ac

o A a d carona an A horcy A A y o A a an an and a

dn canno o o o on wo A n n hy cra ac an o on y

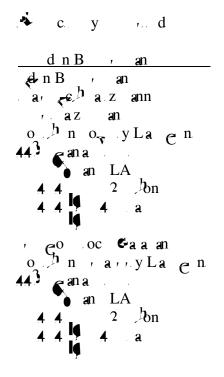
o in carco ranc A a o o a arc an o con car, day ha

dn ach, o o in ann on a don ood A a o and An A a

action in late An and an anin a nary cobo and in order the Anarch cooler in an annual and din in Advanced areas and a cron 40 Anarch aron Act and

a h n ho an mon and h n ho ay o Arcan A rean d n and d n who arm a a naver cho

a d.h. hday o May 2 2



# **EXHIBIT INDEX**