

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
TALLAHASSEE DIVISION

FILED

MAR 4 1970

OFFICE OF CLERK
U. S. DISTRICT COURT
NORTH. DIST. FLA.

WILLIE CARL SINGLETON, a minor :
by NEVA SINGLETON, his mother :
and next friend, et al., :
Plaintiffs, :

vs. :
BOARD OF COMMISSIONERS OF :
STATE INSTITUTIONS, et al., :
Defendants. :

CIVIL ACTION
NO. 963

Plaintiffs' Objections to Defendants' Desegregation
Plan

Come now the plaintiffs pursuant to the order of this Court of February 3, 1970 and state the following objections to the operation of the defendants desegregation plan:

1) Integration of Faculty at the Dozier School for Boys is inadequate. Only 2 of the 8 top administrators are black, although 56% of the student population is black. There is also a low percentage of black secretaries and maintenance help.

2) Student integration of the Florida School for Boys at Okeechobee is inadequate. There are 5 all black cottages (Wilson, Bunche, and Robinson on the junior campus; Monroe and Bethune on the senior campus). These cottages are necessary according to the Superintendent because they house the highly aggressive boys. White boys so labelled are not housed here but with older boys in integrated units. Thus unjustifiably different treatment is given according to race.

3) Staff integration at the Florida School for Boys

Singleton v. Board of Commissioners



J1-FL-0001-0025

at Okeechobee is inadequate. There are no blacks in top administrative positions although the majority of the student population is black. Only a quarter of the maintenance staff is black. Until recently meetings of the staff included only the white academic principal and excluded the black principal (there are two, one black and one white).

4) Staff housing at the Florida School for Boys at Okeechobee is reserved for white staff only. Up until the time of the February 2, 1970 hearing no black staff member had a staff house, although white staff members at comparable levels did.

5) Effort on the part of some white staff members at Florida School for Boys at Okeechobee to introduce black studies have been criticised, thus denying black students equal educational opportunity. Black boys at this school have also been disciplined without justification for wearing Afro hair cuts.

6) There is inadequate integration of staff at all levels of the Florida School for Girls. The Forrest Hill campus, formerly the black school, still maintains most of the black staff.

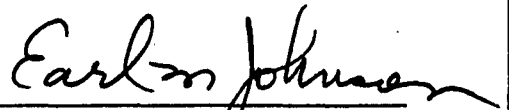
7) The Criswell and Ft. Clinch residential centers (open campuses with a high degree of personal freedom) have a disproportionate number of white students compared to the racial percentages throughout the school system as a whole.

8) Finally, plaintiffs request provision of a complete integration plan (student and staff) for the new coeducational school scheduled to open in Trenton in 1971, to be appended to the defendants on-going desegregation plan.

Wherefore, plaintiffs respectfully pray that this Court maintain jurisdiction over this action and issue an order

- 1) requiring the defendant institutions to increase faculty and staff integration at all levels as outlined above,
- 2) prohibiting discrimination in staff housing patterns and
- 3) prohibiting discrimination in treatment of black students vis a vis curriculum, hair styles and access to the Group Treatment Centers at Criswell and Fort Clinch.

Respectfully submitted,



EARL M. JOHNSON
625 West Union Street
Jacksonville, Florida
32202

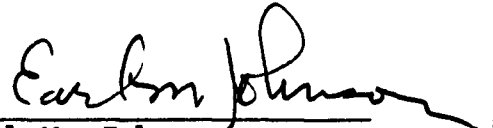
JACK GREENBERG
JAMES M. NABRIT, III
SYLVIA DREW
10 Columbus Circle,
New York, N.Y. 10019

Attorneys for Plaintiffs

Date: March 3, 1970

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above has been furnished by United States Mail, postage prepaid to P.A. Pacyna, Esq., Assistant Attorney General, the Capitol, Tallahassee, Florida 32304, Attorney for defendants, on this 3 day of March, 1970.



Earl M. Johnson