

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION

KALIMA JENKINS, et. al.,	)	
	)	
Plaintiffs,	)	
	)	
VS.	)	Case No. 77-420-CV-W-4
	)	
STATE OF MISSOURI, et. al.,	)	
	)	
Defendants.	)	
	)	

COMPLAINT IN INTERVENTION

1. This is an action, predicated on the Fourteenth Amendment to the United States Constitution and the Civil Rights Act of 1871, which seeks to eliminate the vestiges of the Kansas City, Missouri School District's illegal dual school system and provide the adjudicated victims of discriminatory conduct with real and tangible relief. This Court already has jurisdiction in this case.

2. The averments in paragraphs 1-18 of the accompanying Motion to Intervene are incorporated herein by reference thereto. The students listed therein are still being denied equal educational opportunities by the practices and actions of the Kansas City, Missouri School District and continue to suffer from the injuries inflicted upon African American students by the adjudicated unconstitutional conduct of the KCMSD and the State of Missouri.

3. The Defendants' failure to take all steps necessary to eliminate all the vestiges of the dual school system is a violation of the equal protection clause of the Fourteenth Amendment to the United States Constitution, as well as the orders of this Court.

Wherefore Prospective Plaintiff-Intervenors respectfully requests the Court to issue the following relief:

(1) Implement, for the 1995-96 school year, an education improvement plan with initiatives designed to address the specific academic injuries inflicted upon African American students;

(2) Order the KCMSD to hire personnel qualified to teach in an urban school system and cease and desist the practice of hiring under-qualified and inadequately prepared teachers and school administrators;

(3) Order the KCMSD to use its resources to restore school nurses, home-school coordinators, and additional school-based instructional personnel;

(4) Order the KCMSD to provide continuous cultural and racial sensitivity training to all instructional personnel and school administrators;

(5) Implement, for the 1995-96 school year, initiatives specifically designed to address the debilitating vestiges of "low achievement and general attitude of inferiority among blacks";

(6) Modify the sequence and priority of capital improvement projects to provide for the immediate construction of new non-magnet schools to replace the school

buildings previously ordered closed by this Court;

(7) Implement, for the 1995-96 school year, additional staff development, academic enhancement, and school enrichment programs for the traditional schools, including the annexes;

(8) Implement, for the 1995-96 school year, a program specifically designed to promote, increase, and foster parental involvement by the victimized and disenfranchised segments of the community;

(9) Order the KCMSD to design and implement a coherent and clearly defined curriculum with substantive outcomes;

(10) Order the KCMSD to remove personnel who discriminate against students on the basis of race;

(11) Order an independent comprehensive evaluation of all KCMSD teachers and school administrators;

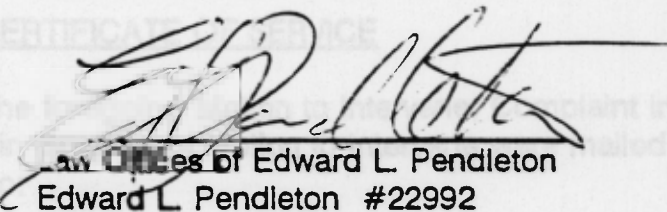
(12) Order an independent study of KCMSD educational programs, curricular practices, and instructional methodologies;


(13) Order an independent analysis of student achievement in the KCMSD;

(14) Award the plaintiff-intervenors reasonable costs and attorneys fees; and

(15) All other relief that may be necessary.

Respectfully submitted:

  
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Motion to Intervene, Complaint in Intervention, and Suggestions in Support of Motion fo Intervene were mailed on this 12 day of December 1994 to:

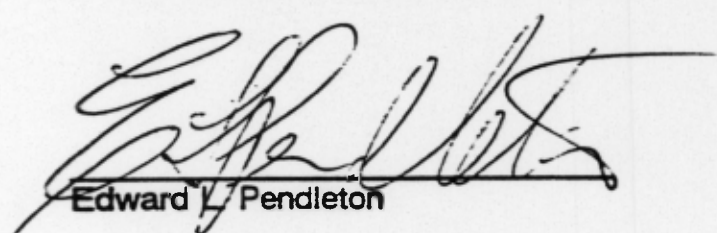
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