

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
OPELOUSAS DIVISION

UNITED STATES OF AMERICA, by)
Nicholas deB. Katzenbach,)
Attorney General of the)
United States,)

Plaintiff,)

v.)

ADDIE HEBERT DEVILLE,)
Defendant.)

C O M P L A I N T

The United States, by Nicholas deB. Katzenbach,
Attorney General, alleges:

1. This action is brought by the Attorney General
on behalf of the United States pursuant to the provisions
of Section 206(a) of the Civil Rights Act of 1964, 42
U.S.C. 2000a-5(a).

2. This court has jurisdiction of this action
under Section 207(a) of the Civil Rights Act of 1964
and under 28 U.S.C. 1345.

3. Addie Hebert Deville is the owner and manager
of a restaurant known as the Traveler's Cafe, located at

411 6th Street in Mamou, Louisiana. She resides in Mamou, Louisiana.

4. The Traveler's Cafe is an establishment principally engaged in selling food for consumption on the premises and a substantial portion of the food and other products sold at such establishment has moved in commerce from outside the State of Louisiana to within the State of Louisiana. The Traveler's Cafe serves and offers to serve food to interstate travelers.

5. The Traveler's Cafe is a place of public accommodation within the meaning of Section 201(b) of the Civil Rights Act of 1964, and its operations affect commerce within the meaning of Section 201(c) of the Act.

6. It is the policy and practice of the defendant in operating the Traveler's Cafe to refuse to sell food to Negroes or to provide service to Negroes upon the same basis as such food is sold and service is provided to white persons.

7. Since the effective date of the Civil Rights Act of 1964, the defendant has refused to sell food to Negroes or to provide service to them at the Traveler's Cafe upon the same basis as food is sold and service is provided to white persons.

8. The acts and practices described in paragraphs 6 and 7 constitute a pattern or practice of resistance to the full and equal enjoyment by Negroes of the goods, services, facilities, privileges, advantages and

accommodations of the Traveler's Cafe without discrimination or segregation on the ground of race or color. This pattern or practice is of such nature as to, and is intended to, deny the full exercise of these rights.

9. Unless restrained by this Court, the defendant will continue to deny Negroes the full and equal enjoyment of the goods, services, facilities, privileges, advantages and accommodations of the Traveler's Cafe without discrimination on the ground of race or color, and will continue to engage in a pattern or practice of resistance as described in paragraph 8.

WHEREFORE, the plaintiff prays that the Court enter a preliminary and permanent injunction enjoining Addie Hebert Deville, together with her agents, employees, officers, successors, and all those in active concert or participation with her, or any of them, from:

- (a) Refusing to admit Negroes to the premises of her restaurant upon the same basis and under the same conditions as white members of the general public are admitted;
- (b) Failing or refusing to sell food or meals and to provide service to Negro patrons upon the same basis and in the same manner as food, meals and service are made available to white members of the general public;
- (c) Otherwise failing or refusing to make any of the goods, services, facilities,

privileges, advantages or accommodations of the Traveler's Cafe available to Negroes upon the same conditions as they are available to white members of the general public, and

- (d) Engaging in any act or practice which deprives, directly or indirectly, any Negro of the full and equal enjoyment, without discrimination or segregation on the ground of race or color, of the goods, services, facilities, privileges, advantages and accommodations of any restaurant owned or operated by the defendant.

Plaintiff further prays that this Court grant such additional relief as the needs of justice may require, including the costs and disbursements of this action.

UNITED STATES OF AMERICA,
Plaintiff,

By:

NICHOLAS deB. KATZENBACH
Attorney General

JOHN DOAR
Assistant Attorney General

EDWARD L. SHAHEEN
United States Attorney

D. ROBERT OWEN
Attorney
Department of Justice