

**Summary of Complaint**  
***Cultural & Racial Equity for Every Dragon, Southlake Anti-Racism Coalition, et al. v. Carroll Independent School District, et al.***  
**Department of Education, Office of Civil Rights**

In Carroll Independent School District (“CISD” or the “District”), students of color, LGBTQ+ students, and their families must make a cruel choice: submit to discrimination based on race, color, national origin, and sex, or leave the District despite the great resources and opportunities offered by public schools in their hometown. By forcing students to endure severe and pervasive race and sex harassment in order to access their education, school officials in CISD violate their duty under civil rights law to provide all students with a nondiscriminatory environment conducive to learning. *See generally* 34 C.F.R. part 100, 106 (1980) (prohibiting race or sex discrimination which interferes with educational programs or activities pursuant to Title VI of the Civil Rights Act of 1964 and Title IX of the Education Amendments of 1972, 42 U.S.C. § 2000d *et seq.* 20 U.S.C. § 1681 *et seq.*).

For years, CISD officials have known that the hostile environment in the District limits students of color and LGBTQ+ students from fully participating in the school’s education programs and activities. Individuals and organizations, including the claimants in this case, repeatedly reported incidents where students were subject to slurs, threats, and demeaning treatment. On at least two occasions, in 2018 and 2019, incidents of white students in the District chanting racial slurs were documented on video for all to see. In 2020, students in the Southlake Anti-Racism Coalition provided the District with hundreds of unique student testimonies documenting harassment based on race, sex, and national origin. And in 2020, a 63-person commission appointed by the Board to study diversity and inclusion in the District discovered countless stories of race and sex harassment and recommended a plan to address the hostile environment.

Among the organizational complainants is Cultural & Racial Equity for Every Dragon (“CREED”) and Southlake Anti-Racism Coalition (“SARC”). CREED was established on March 24, 2021, by a group of parents of Black Southlake students who were concerned about emotional and mental harms inflicted on their children by the racially hostile environment in CISD. SARC is a coalition of current and former CISD students demanding systemic, anti-racist change in CISD. SARC was founded when several current and former CISD students began to collect and publish their experiences with racial harassment within the District, and started a petition seeking, among other things, a Diversity, Equity, and Inclusion program and a district-wide effort to make the teaching body reflect the diversity of the student body.

Among the individual complainants is Student A, a Black student in the District. At least once each year for over three years, he has been called a “nigger.” He was also called a “porch monkey.” Derogatory language and proxy terms like these are known to be commonplace among students in CISD. When reported, they are often unaddressed, and students who report are retaliated against. Student A was ostracized and called a “snitch” by other students for reporting racial slurs used against him. This student has suffered severe psychological anguish as result of this demeaning harassment.

Another individual complainant, Student B, was called racial slurs beginning in elementary school, including the word “nigger,” “bitch,” “faggot,” and referred to as “the help.” Nearly every time this occurred, the District was notified, but did nothing. Student B suffered retaliation and was ultimately forced to withdraw from the District following frequent and severe racial harassment.

Another individual complainant, Student C, has been subject to harassment on the basis of his sexual orientation, being called “gay,” “faggot,” “furry,” “trans.” The abuse transgressed

beyond linguistic into physical violence, leaving welts on his legs. Students also put trash in his backpack. As a result, Student C suffered severe psychological anguish and experienced suicidal ideation. Student C ultimately withdrew from the District following the frequent and severe harassment based on his sex.

Another complainant, Student D, who identifies as queer and non-binary, experienced insulting uses of the word “gay,” as well as the homophobic slur “fag.” On one occasion, Student D was physically attacked in the hallway. When Student D reported these incidents, District staff did nothing to address or prevent the treatment from recurring, making Student D feel that school was not a safe place for them.

CISD officials declined to take remedial action with respect to individual incidents or to otherwise acknowledge the systemic nature of the problem. Instead, CISD has sought to limit access to information that could raise awareness, promote a more supportive environment for all students, and increase sensitivity about inequality based on race, color, national origin, and sex. The District punished a teacher for allowing students to read about antiracism, and instructed staff not to teach that the genocide of Jewish people during the Holocaust was unequivocally wrong. Research shows that race-conscious and culturally relevant education can foster a climate of inclusivity, protect students of color and LGBTQ+ students from the harms of a hostile environment, and allow all students to thrive academically. CISD’s failure to provide necessary instruction and training has had the opposite effect—exacerbating rather than eliminating the discrimination in CISD schools.