



J. Michael Clára
Salt Lake City School Board
District Two

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6 November 2015

DELIVERED VIA CERTIFIED MAIL: 7012 2920 0000 7124 9141

Office for Civil Rights (OCR) -Region VIII
% U.S. Department of Education
Cesar E. Chavez Memorial Building
1244 Speer Boulevard, Suite 310
Denver, CO 80204-3582



Re: Disparate Treatment of School Administrators of Color

Dear OCR-Region VIII,

Acting under the authority of my elected office, and in my official capacity as a member of the Salt Lake City Board of Education (*Board*), ¹ I submit the following **Title VI of the Civil Rights Act of 1964** complaint on behalf of the students of color that I was elected to represent and on behalf of other students similarly situated. This complaint will demonstrate that Superintendent McKell Withers (*Superintendent*), Business Administrator Janet Roberts (*Business Administrator*) and Board President Heather Bennett (*Board President*) have discriminated against African American, American Indian, Hispanic and Pacific Islander students on the basis of race by administering district-wide employment and contract awarding practices that have a **DISPARATE IMPACT** on students of color within the Salt Lake City School District (*District*).

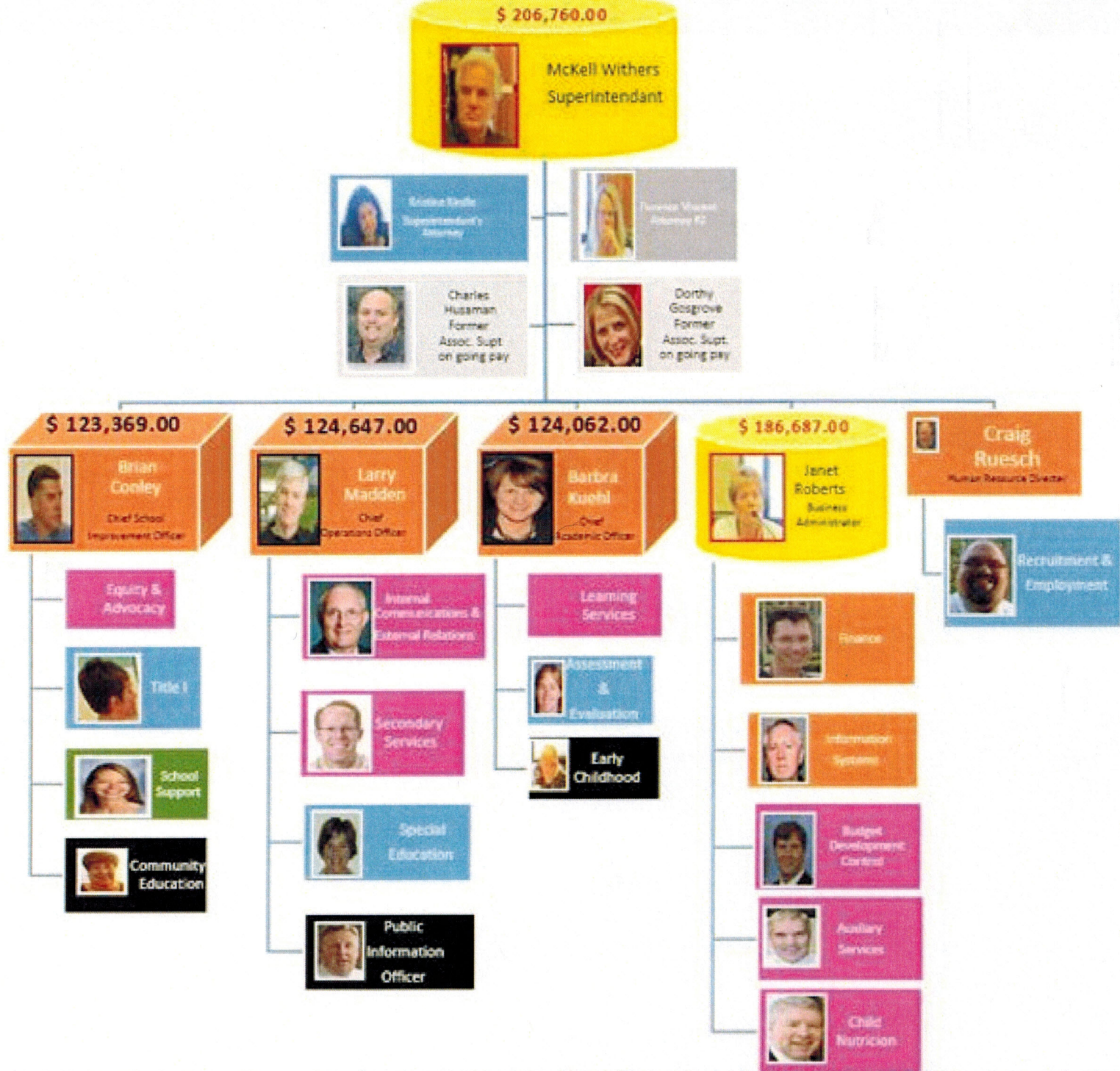
More specially, this complaint will outline a pervasive pattern and practice of cronyism ² in which state and federal tax dollars are consistently diverted away from the educational programs designed for students and instead used to ensure that Caucasian associates of the current administration are placed in positions of authority. The Board President is complicit in these actions by consistently interfering with the Boards ability to exercise its statutory authority to regulate these types of despicable acts. These actions have now risen to a level of **DISPARATE TREATMENT** towards the eighteen administrators of Color currently working in the *District*. This complaint will establish that the **DISPARATE TREATMENT** of ethnic minority adults in the system has a demonstrated **DISPARATE IMPACT** on the students of the *District*.

¹ Notwithstanding a local school board's status as a body corporate, an elected member of a local school board serves and represents the residents of the local school board member's district, and that service and representation may not be restricted or impaired by the local school board member's membership on, or obligations to, the local school board. See *Utah Code § 53A-3-401(5)*

² Definition: Cronyism (noun) the appointment of friends and associates to positions of authority, without proper regard to their qualifications. In this complaint, the "associates" are all Caucasian

"Local school boards are the bedrock of our society, yet they are invisible to the public"

Señor Florez -Deseret News



Following is inserted here to illustrate the irony of the current situation:

10: Administrative Procedures Educational Equity and Advocacy



REFERENCES
[School Policy I-10](#)

- all students regardless of their demographic groups.

The district actively works to recruit, employ, support, and retain culturally and linguistically diverse and culturally competent administrative, instructional, and support personnel. Professional development shall be developed and provided on a continuing basis to identify and resolve problems associated with the student achievement gap and other inequities arising from disparities. The district shall also actively strive to have our teacher and administrative workforce reflect the diversity of its students and communities.