



**UNITED STATES DEPARTMENT OF EDUCATION**

**OFFICE FOR CIVIL RIGHTS  
ADMINISTRATIVE COMPLAINT**

March 30, 2021

United States Department of Education  
Office for Civil Rights  
Lyndon Baines Johnson Department of Education Building  
400 Maryland Avenue, SW  
Washington, DC 20202-1100  
Via Email: OCR@ed.gov

To Whom It May Concern:

This is a federal civil rights complaint pursuant to the U.S. Department of Education's (Department) Office for Civil Rights' (OCR) discrimination complaint resolution procedures.

Parents Defending Education (PDE) brings this complaint against Webster Groves School District (WGSD or District) in Webster Groves, Missouri, for discrimination on the basis of race, color or national origin in programs or activities that receive Federal financial assistance in violation of Title VI of the Civil Rights Act of 1964 (Title VI), 42 U.S.C. § 2000d *et seq.*

PDE makes this complaint as an interested third-party organization that opposes racial discrimination and political indoctrination in America's schools. Attached to this complaint is supporting evidence in the form of a blog post written by the District's Superintendent, John Simpson, on June 3, 2020. Simpson's post asserts that that "inequitable systems and structures" exist "within our school district." Those inequitable systems and structures disadvantage "Black children," according to Superintendent Simpson, and "[c]learly" require "much" more work to dismantle.

As the Department of Education is no doubt aware, such an admission from a district superintendent raises concerns that the Webster Grove School District has received federal funds in violation of Title VI of the Civil Rights Act of 1964, which declares that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." When the President of Princeton University made similar claims in an open letter to the University, *Ltr. from President Eisgruber on the*



*University's Efforts to Combat Systemic Racism* (Sept. 2, 2020), <https://bit.ly/2PHrvBY>, OCR swiftly opened an investigation, *Ltr. from Robert King to President Eisgruber* (Sept. 16, 2020), <https://bit.ly/3dIMORI>.

Accordingly, we ask that OCR promptly investigate the allegations in this complaint, act swiftly to remedy unlawful policies and practices, and order appropriate relief.

Thank you for your prompt assistance with this request for investigation and resolution. Please contact me for further information.

Sincerely,

A handwritten signature in black ink, appearing to read "Nicole Neily", with a stylized flourish at the end.

Nicole Neily  
President  
Parents Defending Education  
[Nicole.neily@defendinged.org](mailto:Nicole.neily@defendinged.org)

Enc. Exhibits A



## **EXHIBIT A**

## EACH CHILD, EACH DAY...

[≡ MENU](#)

### GEORGE FLOYD +

june 3, 2020 by eachchildeachdaywgsd

Dear WGSD Family,

Our community, our region, our country and our world are hurting. So are many of you. The world has once again witnessed the brutal execution of an innocent Black man, George Floyd. The police officers involved deserve to be punished to the fullest extent possible.



3/28/2021

George Floyd + – Each Child, Each Day...

All over the world, people are protesting not only the killing of George Floyd, but the police killings of many other unarmed Black people over time. No different than the educational system (and many others), the criminal justice system is broken. Unlike a car that returns to full functionality after the repair or replacement of a broken part, systems designed to benefit some and not all, require dismantling and rebuilding. I'm not saying that all police officers are bad or all educators are bad, but they (we) operate within systems that, by their outcomes, clearly privilege one race over another. It's undeniable.

To our Black family members, I can't begin to imagine the physical and mental toll of living life in a society so steeped in racism. I can't imagine the exhaustion and worry you have yourself, and that you feel for your family and loved ones. And it's so unfair that I can't.

To our White family members, it's essential that our actions match our stance when it comes to addressing racism in our homes, workplaces, community and in ourselves. While many of us are quick to judge and express outrage at a criminal justice system that harms, and even kills, African Americans on a regular basis, it's critically important to demonstrate the same level of outrage and advocacy within our spheres of influence and control. If we only express disgust and outrage when innocent Black men and women, adults and children, are brutally killed "in front" of us, then we're doing more harm than good. If we curse and criticize the criminal justice system's brokenness that led to the killings of Breonna Taylor, Ahmaud Aubrey, George Floyd and countless others, yet fail to see the same level of brokenness in the systems in which we live and work, then we're doing more harm than good. If we cast blame and condemnation on others without acknowledging the role we play in perpetuating such systems, we do more harm than good.

<https://eachchildeachdaywgsd.com/2020/06/03/george-floyd/>

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3/28/2021

George Floyd + – Each Child, Each Day...

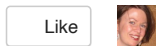
As your superintendent and as a white man, I must hold myself and our school system to a greater level of accountability in how we see and support our Black children, staff and parents and how our work is leading to the dismantling of the inequitable systems and structures within our district. The success and well-being of our Black children can be the only barometer of our progress, not efforts. Clearly, we have much work to do and we will.

With care,

John

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#### PREVIOUS POST

**May 15: WGSD (includes parent/guardian survey)**

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#### NEXT POST

**Uprooting Racism – We Must Listen and Learn from Our Young  
People: June 7 at 12:00 p.m.**

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SUBSCRIBE TO BLOG VIA EMAIL

<https://eachchildeachdaywgsd.com/2020/06/03/george-floyd/>

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