



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE FOR CIVIL RIGHTS  
ADMINISTRATIVE COMPLAINT

February 24, 2025

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 San Leandro Unified School District in San Leandro, CA for discrimination on the basis of race in programs or activities that receive federal financial assistance in violation of both Title VI of the Civil Rights Act of 1964 (Title VI), 42 U.S.C. § 2000d *et seq.*, and the Equal Protection Clause of the 14th Amendment to the U.S. Constitution.

PDE makes this complaint as an interested third-party organization with members who are parents of school children throughout the country. PDE and its members oppose discrimination on the basis of race and political indoctrination in America's schools. San Leandro Unified School District has educational and affinity group programming that is open to some students and teachers, but not open to all. Participation in this affinity group programming is solely based on a student's or teacher's race.

Attached to this complaint is evidence in the form of a contract between "Kingmakers of Oakland" and two schools in the San Leandro Unified School District (Exhibit A), which clearly states the partnership between District schools and this organization for the 2024-2025 academic year. The contract "capture[s] the relationship between us [Kingmakers and the schools] for the 2024-2025 school year" (Ex. A at 2).

Kingmakers of Oakland prides itself in being a race-focused organization. It is "fundamentally transforming the education system and building the capacity of people to design and sustain thriving and liberated systems, structures, conditions,



and culture to improve educational and life outcomes for Black Students” (Ex. A at 1).

According to the exhibit, Kingmakers believes “society and educational systems have not been designed to help Black boys reach their potential” (Ex. A at 1). Its program intends to “uplift the intrinsic potential and inherent brilliance of every Black male student” (Ex. A at 1).

Six “system change drivers” for the program include (Ex. A at 1):

- “Culturally Responsive Pedagogy and Curriculum”
- “Black Male Teacher Recruitment, Training & Retention”
- “Youth Voice & Leadership”
- “Family and Community Engagement”
- “Narrative Change”
- “Policy”

Furthermore, the “vision” of this program is to have “Black boys and men ... posses[s] innate greatness as Kings” and to “celebrate Black people and culture and improving educational and life outcomes for Black boys from Pre-K to PHD” (Ex. A at 2).

The budget outlined in the contract is \$74,750 and encompasses both academic institutions (Ex. A at 6). The budget includes line items for events [“Black to School” and “Crowning Ceremony”], as well as leadership planning [“principal support,” “facilitator professional growth plan”, and “care management”] (Ex. A at 5).

The “needs assessment” provided in the contract separates students by race, with an exclusive focus on the “needs” of black students. It notes broadly that “the largest demographic on the campus identifies as Hispanic/Latino” and many others “identify as Asian” (Ex. A at 3). But it breaks down black student enrollment in much more detail, identifying the number in each grade level (Ex. at 3-4).

Goals for Kingmakers of Oaklands involvement in the District include (Ex. A at 3):

- “an increased sense of belonging”
- “an increased sense of cultural/racial identity”
- “an increased sense of self-efficacy”
- “an increased sense of collective responsibility”

The self-proclaimed history of Kingmakers points to race-focused outcomes in other school districts: improving “literacy” and “academic mentoring” for Black boys, and



even establishing a “Office of African American Male Achievement” in the Oakland Unified School District (Ex. A at 2).

Additional services discussed in the contract—such as mentorship, a “crowning ceremony,” the “Kingmakers classroom experience,” “curriculum,” and “professional learning”—would likewise confer a benefit that is not accessible to the entire student and educator body, based solely on race.

As the Department of Education is no doubt aware, discrimination on the basis of race raises concerns that San Leandro Unified 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.”

In addition, Section 1 of the 14th Amendment to the U.S. Constitution asserts: “No state shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any state deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.” On these grounds, the Supreme Court held in 1954 that racial segregation of students is unconstitutional. *Brown v. Board of Education of Topeka*, 347 U.S. 483 (1954).

A September 29, 2015 decision from the Department of Education Office for Civil Rights during the Obama Administration is directly on point: in 2015, following “the police actions involving African American victims in Ferguson and New York and subsequent events,” Oak Park & River Forest High School District 200 held a “Black Lives Matter” assembly during Black History Month. The assembly was convened “for African American students only” because the district wanted “to provide a comfortable forum for black students to express their frustrations.” Certain students “who self-identified as white were directed by District officials not to participate in the event as this assembly was designed for students who self-identify as black.” In the letter sent on September 29, 2015 (OCR Docket #05-15-1180), OCR found that the district violated the Equal Protection Clause and Title VI because the district’s actions could not withstand strict scrutiny. Specifically, the district failed to “assess fully whether there were workable race-neutral alternatives” and “did not conduct a flexible and individualized review of potential participants.” In a Resolution Agreement with OCR, the district agreed that its programs and activities would be “open to all students . . . regardless of their race” and to adopt policies and training to ensure the district’s compliance. OCR imposed these requirements even though the district had promised “not to hold such events in the future.”



Accordingly, we ask that the Department 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 K. Neily". The signature is fluid and cursive, with a large loop at the end.

Nicole K. Neily  
President  
Parents Defending Education

Enc. Exhibit A



## Exhibit A



Friday, June 21, 2024

Eliza Alvarez  
Principal  
John Muir Middle School  
1444 Williams Street  
San Leandro, CA 94577

Virginia Quock  
Principal  
Halkin Elementary  
1300 Williams Street  
San Leandro, CA 94578

Proposal to Offer Services to John Muir Middle School and Halkin Elementary School

### **Organization Overview**

Kingmakers of Oakland (KOO) is a leadership development and systems change organization committed to fundamentally transforming the education system and building the capacity of people to design and sustain thriving and liberated systems, structures, conditions, and culture to improve educational and life outcomes for Black students. Because society and educational systems have not been designed to help Black boys reach their potential; KOO aims to rebuild the systems, structures, culture, and conditions required to uplift the intrinsic potential and inherent brilliance of every Black male student. KOO partners with public school districts nationally to ensure Black male students excel. Partner districts learn and implement KOO strategies that optimize leadership to build culture and systems that transform districts across KOO's six Systems Change Drivers:

1. Culturally Responsive Pedagogy and Curriculum
2. Black Male Teacher Recruitment, Training & Retention
3. Youth Voice & Leadership
4. Family and Community Engagement
5. Narrative Change
6. Policy

### **Kingmakers of Oakland**

**Vision:**

We believe in a world where all Black boys and men are seen as and see themselves as brilliant, beautiful, and possessing innate greatness as Kings; We believe in a world where society's systems, structures, and conditions enable all of us to reach our full potential.

### **Mission:**

We reimagine systems of education, culture, and wellness while driving narrative change that celebrates Black people and culture and improving educational and life outcomes for Black boys from Pre-K to PhD.

### **Values:**

Our values are at the core of all we do:

- King Centered
- Love
- African Centered
- Collective Will
- Partnership

### **History:**

The Kingmakers of Oakland (KOO) is a nationally recognized Dee & Penner (2019) non-profit committed to improving educational life outcomes for Black boys. In 2010, Oakland Unified School District launched its first-in-the-nation Office of African American Male Achievement (AAMA). The department implemented a Kingmakers class, an elective specifically designed for Black male students (called Kings) taught by Black male educators, which emphasized Black history, cultural knowledge, positive self-identity, literacy, and academic mentoring. This class became the impetus for KOO. In 2018, KOO aimed to accomplish a larger vision: to build the capacity of educational leaders in public schools to create healthy, affirming learning environments for Black boys. Through professional learning, collaborative learning communities, coaching, and curriculum KOO seeks to improve the competencies of the educators within public school systems to cultivate culture and conditions where Black boys, Kings, express their innate greatness and lead from their internalized sense of brilliance and beauty.

### **Purpose of Proposal**

#### **Objective:**

This proposal to the principals of John Muir Middle School and Halkin Elementary School from Kingmakers of Oakland is intended to capture the relationship between us for the 2024 - 2025 school year.

#### **Overview of Proposed Services:**

During the 24 - 25 school year Kingmakers of Oakland will provide 1 facilitator shared between two campuses access to the Kingmakers classroom experience designed to Engage, Encourage, and Empower Black boys to help them achieve by demonstrating:

- An increased sense of belonging
- An increased sense of cultural/racial identity
- An Increase in self-efficacy
- An increased sense of collective responsibility

This is accomplished by the [Crowns Curriculum and the Kingmaker experience](#). Access to the curriculum is contingent on the facilitator participating in the 3 day intensive PD, monthly PLC, and ongoing coaching. In addition to the above and in order for the kings, their families, and the school community to fully benefit from the Kingmaker experience we highly encourage both school communities to fully commit to the following:

- Two F.A.C.E. events - [Black to School](#), [Crowning Ceremony](#)
- Attendance at Spring Symposium 2025
- Prepare and participate in the Student Showcase 2025

## Needs Assessment

### Identified Needs

During the 2023 - 2024 school year John Muir Middle School had a total enrollment of 935 students. 108 of those students identified as Black/African American with 38 in the 6th grade, 32 in the 7th grade, and 38 in the 8th grade. The largest demographic on the campus identifies as Hispanic/Latino; 446 and 199 identify as Asian.

During the 2023 - 2024 school year Halkin Elementary School had a total enrollment of 719 students. 43 of those students identified as Black/African American. The following table shows the number of Black students enrolled by grade.

Grade	Number of Black Students
TK	2
K	3
1	7
2	6
3	10
4	9



5	6
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Similar to John Muir Middle School, the largest demographic on the campus identifies as Hispanic/Latino (386) followed by Asian (171).

### **Summary of the School's Needs**

Principals Alvarez and Quock both expressed interest in having our Kingmaker class on both of their campuses. Based on the number of students on each campus they are considering 3 to 4 classes on the middle school campus and 1 to 2 classes on the elementary campus. Both principals have expressed that they have been interested in partnering with Kingmakers of Oakland for years to support their Black students.

### **Key Staff**

**Chris Chatmon**, CEO and Founder; for a decade, he pioneered as the inaugural Executive Director of African American Male Achievement (AAMA) at Oakland Unified School District (OUSD), the first of its kind nationally within a public school district. He also held roles as OUSD's first Deputy Chief of Equity and the Executive Director of Urban Services YMCA. Passionate about uplifting the African-American community, Chatmon dedicates his career to forging success pathways for Black youth in and beyond Oakland. He's earned numerous local and national accolades, including the Oscar Wright Lifetime Achievement Award and The City of Oakland Mayor's Proclamation, July 1st "Chris Chatmon Day." Recognized as a "Leader to Learn From" by Education Week Magazine and a "Social Innovation Accelerator" by Campaign for Black Male Achievement, Chatmon has a rich background in education, including serving as a high school principal, YMCA Executive Director, and educator in San Francisco Unified School District. He holds an M.A. in Education and a secondary teaching credential in Social Science from Brown University. Chatmon resides in Oakland with his wife and three sons.

**Matin Abdel-Qawi**, CPO, has been an equity-centered educational leader in Oakland Unified School District for nearly thirty years. After nearly three decades in the Oakland Unified School District Matin left OUSD to join Kingmakers of Oakland as its Chief Program Officer. In this new role Matin is responsible for making sure that all of our district partners receive best-in-class services. Matin holds a BA from Stockton State University, NJ and an MA from the University of California, Berkeley.

**Staci Smith**, Director of Curriculum and Training; brings nearly 20 years of experience in education in a variety of roles ranging from classroom teacher, Math department chair, Math teacher trainer for College Preparatory Mathematics, school principal, and Interim Executive Director at Oakland School for the Arts. She has seen first hand the impact of traditional learning systems on students, particularly Black students and specifically, Black boys. As an educator, she created safe spaces for students who didn't fit the mold that was imposed by a white supremacist lens both as a teacher and as an administrator.

Staci is a 15 year kidney transplant survivor, a #1 best-selling contributing author in “Courageous Women Finding Strength During The Storm”, a certified Master Life Coach, Toastmaster trained public speaker, Certified Emotional Intelligence facilitator, Certified Restorative Practices facilitator, and is a member of the National Association of Alumnae of Spelman College, where she earned a Bachelor of Science in Mathematics.

**Sean Foster**, Program Manager, Culturally Relevant Pedagogy; is an educator, mentor, artist and community worker that was born and raised in Oakland, California. Sean became committed to the work of empowering black boys after graduating with a bachelor’s degree in communications from his Alma Matter, Clark Atlanta University – an HBCU in Atlanta, Georgia. In 2012, Sean joined the African American Male Achievement Program (AAMA) whose guiding mission to engage, encourage and empower young black boys aligned with his. Within this work, Sean has taught and mentored throughout the K-12 system in Oakland and is currently teaching an AAMA class at Dewey Academy and mentoring kings at Met West High School. Drawing on his years of teaching, training and service within the AAMA organization, Sean has transitioned into the role of Senior Facilitator for Kingmakers of Oakland (KOO) where he will support other instructors on how to become transformative educators.

**Budget**

Service/Support	Period	Quantity	Amount
Licensed Curriculum Access	August 2024 - July 2025	2 Sites/1 Facilitator	\$10,000 Annually
Facilitator Summer Training	August 2024	40 Hours	\$10,000
Facilitator PLC (coaching, observations, feedback sessions)	September - June		\$20,000
F.A.C.E. events - Black to School, Crowning Ceremony	September and June	2 Events	\$10,000
Classroom climate and culture development <ul style="list-style-type: none"> <li>● T shirts</li> <li>● Hoodies</li> <li>● Snacks</li> <li>● Field trips</li> </ul>			\$7,500
Technical Assistance - Leadership Consulting (principal support, facilitator professional growth plan, and care management)	September and June	25 Hours	\$5,000

Spring Symposium 2025	April	10 Registrants	\$2,500
		Service Sub Total	\$65,000
		Indirect 15%	\$9,750
		Total Contract Cost	\$74,750

**Contact Information**

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Signature

Christopher Chatmon  
 Chief Executive Officer, Kingmakers of Oakland