

August 24, 2016

Office for Civil Rights  
District of Columbia Office  
United States Department of Education  
400 Maryland Avenue SW  
Washington, DC 20202-1475

**Via email (OCR.DC@ed.gov) and U.S. mail**

**Re: Complaint against Richmond Public Schools under Title VI of the Civil Rights Act of 1964; Section 504 of the Rehabilitation Act of 1973; and Title II of the Americans with Disabilities Act of 1990**

To Whom It May Concern:

Please accept the attached civil rights complaint against the City of Richmond Public Schools in Richmond, Virginia.

**Complainants**

1. Jay'quan Royster  
1412 Silver Avenue  
Richmond, VA 23234  
(804) 868-8717
2. Aaron Lambert  
706 Mosby Street, Apt. E  
Richmond, VA 23223  
(804) 803-4444
3. National Association for the Advancement of Colored People – Richmond Branch  
c/o Lynetta Thompson, President  
P.O. Box 25576  
Richmond, VA 23260  
(804) 982-8072

Please note that Rachael Deane, attorney for Complainants Royster and Lambert, and Charlie Schmidt, attorney for Complainant National Association for the Advancement of Colored People, Richmond Branch, shall serve as the main points of contact for this complaint. All communications with complainants shall be directed to their attorneys.

**Recipient(s)**

1. City of Richmond Public Schools (Richmond, Virginia)  
301 North Ninth Street  
Richmond, VA 23219

**Basis of Complaint**

Discrimination based on race  
Discrimination based on disability

**Most Recent Date of Discrimination**

Complainants allege that discrimination has occurred within the past 180 days and is ongoing.

Respectfully submitted,



Rachael Deane (Va. Bar. # 80289)  
Lisa Bennett (Va. Bar # 30288)  
Angela Ciolfi (Va. Bar #65337)  
JustChildren Program

Legal Aid Justice Center  
123 East Broad St.  
Richmond, VA 23219  
(804) 521-7304  
rachael@justice4all.org  
lisa@justice4all.org  
angela@justice4all.org



Charles H. Schmidt, Jr. (Va. Bar # 84416)  
American Civil Liberties Union of Virginia  
701 East Franklin Street, Suite 1412  
Richmond, Virginia 23219

(804) 644-8022  
cschmidt@acluva.org

CC: Richmond Public Schools, by counsel

Enclosures