

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF LOUISIANA
SHREVEPORT DIVISION

UNITED STATES OF AMERICA, by)
NICHOLAS deB. KATZENBACH,)
Attorney General of the)
United States,)

Plaintiff,)

v.)

THE CITY OF SHREVEPORT, a)
Municipal Corporation; CLYDE)
FANT, individually and as)
Mayor of the City of Shreve-)
port; CLYDE STALLCUP, indi-)
vidually and as Superinten-)
dent of Parks and Recreation)
of the City of Shreveport,)
Louisiana; GEORGE D'ARTOIS,)
individually and as Commis-)
sioner of Public Safety of)
the City of Shreveport,)

Defendants.)

CIVIL ACTION NO.

C O M P L A I N T

1. This is an action instituted by the Attorney General on behalf of the United States pursuant to Section 301 of the Civil Rights Act of 1964, 42 U.S.C. 2000b.

2. This Court has jurisdiction of this action under Section 301(a) of the Civil Rights Act of 1964, 42 U.S.C. 2000b, and 28 U.S.C. 1335.

3. The City of Shreveport is a municipal corporation organized and existing under the laws of the State of Louisiana. It owns and operates, through its Parks and Recreation Department, a system of public recreation facilities, including, but not limited to, parks, swimming pools, recreation centers, baseball fields, golf courses, sports arenas and athletic clubs.

4. Clyde Fant is the Mayor of the City of Shreveport, and as Mayor he has authority over and participates in the establishment of policies for the Parks and Recreation Department and is an ex-officio member of the Parks and Recreation Department Council. Mayor Fant appoints the members of this council which is an agency of the City of Shreveport and which advises and assists the mayor and defendant Stallcup in the operation of the public recreation facilities owned and operated by the city. Mayor Fant resides in Shreveport, Louisiana.

5. Clyde Stallcup is the Superintendent of the Parks and Recreation Department of the City of Shreveport, and as such he is responsible for the operation of all public facilities under the control of the Parks and Recreation Department.

6. George D'Artois is the Commissioner of Public Safety of the City of Shreveport and in this capacity is responsible for the maintenance of law and order in the City of Shreveport including its public recreation facilities in Shreveport. He resides in Shreveport, Louisiana.

7. It is the policy of the defendant city including the Parks and Recreation Department Council, defendant Fant and defendant Stallcup to operate the public recreation facilities of the City of Shreveport, with the exception of the municipal golf course, on a racially segregated basis.

8. Pursuant to the policy as described in the preceding paragraph, the said defendants during the summers of 1964 and 1965, have refused Negroes, because of their race, admission to and full and equal use and enjoyment of swimming pools owned and operated by the City of Shreveport.

9. On or about July 24, 1964 defendant D'Artois and his agents, police officers of the City of Shreveport, were present at a public swimming pool owned and operated by the City of Shreveport. While there said defendant and his agents interrogated Negroes attempting to use the swimming pool on a desegregated basis and defendant D'Artois subsequently arrested one of said Negroes, all for the purpose of interfering with the right of Negroes to admission to and full and equal use and enjoyment of the swimming pools owned and operated by the City of Shreveport.

10. The Attorney General has received a signed complaint from a Negro citizen to the effect that he has been deprived of his right to equal protection of the laws, on account of his race, by being denied equal utilization of

the public recreation facilities of Shreveport, Louisiana, which facilities are owned and operated by said City of Shreveport, and the Attorney General has certified that in his judgment the signer of the complaint is unable to initiate and maintain appropriate legal proceedings for relief and that the institution of an action will materially further the orderly progress of desegregation in public facilities.

11. The acts, practices and policies described in this complaint constitute a deprivation of the right of Negroes to the equal protection of the laws, by denying them, on the ground of race or color, the full and equal use and enjoyment of the public recreation facilities owned, operated or managed by or on behalf of the City of Shreveport.

12. Unless restrained by this Court, the defendants will continue to deprive Negroes of the equal protection of the laws by denying them, on the grounds of race or color, the full and equal use and enjoyment of the public recreation facilities owned and operated by the City of Shreveport.

WHEREFORE, Plaintiff prays that this Court enter an order enjoining the City of Shreveport, Clyde Fant, Clyde Stallcup, and George D'Artois, together with their successors, agents, employees, and all persons in active concert or participation with them, or any of them from:

- a. Refusing to admit Negroes to any public recreation facility owned, operated or managed by or on behalf of the City of Shreveport, Louisiana;
- b. Making any distinction whatever, on the basis of race or color, in the availability of any of the services, facilities, privileges, or advantages offered, or made available to the public at any of the public facilities owned, operated or managed by or on behalf of the City of Shreveport;
- c. Otherwise failing or refusing to make any of the services, facilities, privileges, or advantages of the public facilities owned, operated or managed by or on behalf of the City of Shreveport, available to Negroes upon the same conditions as they are available to the general public;
- d. Engaging in any act or practice which deprives, directly or indirectly, any Negro of the full and equal use and enjoyment, without discrimination or segregation on the ground of race or color, of the public facilities owned, operated or managed by or on behalf of the City of Shreveport.

Plaintiff further prays that defendant D'Artois, his successors, agents, employees, and all persons in active concert or participation with them be preliminarily and permanently restrained from hindering or interfering with, by arrest, interrogation, harassments, or otherwise, the right of Negroes to the full and equal use and enjoyment, without discrimination or segregation based on race or color, of the public facilities owned, operated or managed by or on behalf of the City of Shreveport.

Plaintiff further prays that this Court grant such additional relief as the needs of justice may require, including the costs and disbursements of this action.

NICHOLAS deB. KATZENBACH
Attorney General

JOHN DOAR
Assistant Attorney General

EDWARD L. SHAHEEN
United States Attorney

D. ROBERT OWEN
Attorney
Department of Justice

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et al.,)
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CERTIFICATE OF THE ATTORNEY GENERAL

Nicholas deB. Katzenbach, Attorney General of the United States, certifies that he has received a written complaint signed by an adult Negro citizen that he has been denied the equal protection of the laws by having been denied equal utilization of a public facility which is owned, operated, and managed by the City of Shreveport, Louisiana and its agents; that the signer of such complaint is unable, in his judgment, to initiate and maintain appropriate legal proceedings for relief, and that

the institution of this action will materially further
the orderly progress of desegregation in public facilities.

This certification is made pursuant to the provisions of Section 301(a) of the Civil Rights Act of 1964, 42 U.S.C. 2000b(a).

Signed this _____ day of _____, 1965.

NICHOLAS deB. KATZENBACH
Attorney General