

NPS Form 10-900 (Rev. 8-86)

OMB No. 1024-0018

United States Department of the Interior National Park Service

NATIONAL REGISTER OF HISTORIC PLACES REGISTRATION FORM

historic name: <u>Douglass High Schoo</u>	
other name/site number: <u>Douglass Co</u>	ommunity school, DHR #253-70
2. Location	
street & number: <u>408 East Market S</u> city/town: <u>Leesburg</u>	not for publication: n
orely comm. <u>Incondity</u>	vicinity: n
state: <u>VA</u> county: <u>Loudoun</u>	code: <u>107</u> zip code: <u>220</u>
3. Classification	
	Number of Description Description
Ownership of Property: public-local Category of Property: building	Number of Resources within Property:
	Contrkbuting Noncontributing
Name of related multiple	_21_ buildings
property listing: <u>N/A</u>	<u> </u>
• .1	$\begin{array}{ccc} \underline{a} & & \underline{0} & \text{structures} \\ \underline{0} & & \underline{0} & \text{objects} \end{array}$
Number of contributing resources	
previously listed in the National Register: N/A	
legistei. <u>N/A</u>	
	——————————————————————————————————————
. State/Federal Agency certification	
s the designated authority under the	National Historic Preservation Act of
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I, hereby certify that this property is:			
entered in the National Register See continuation sheet.			· ·
determined eligible for the National Register See continuation sheet.	· · · · · · · · · · · · · · · · · · ·		
determined not eligible for the National Register removed from the National Register			
other (explain):			
	Siç	nature of Ke	eeper Date of Action
6. Function or Use			
Historic: EDUCATION: school	_ Current:	EDUCATION: OTHER: comm	school munity center park
-=====================================			
======================================		Materials:	
Late 19th & 20th Century Revival:	£	oundation	brick
Colonial Revival	wa	of	brick metal
	ot	her	wood
Describe present and historic physical ap	pearance.	X See cont	inuation sheet.
3. Statement of Significance	•		
	gnificance		
Certifying official has considered the sicelation to other properties: Locally			
			
relation to other properties: <u>locally</u>	_		
relation to other properties: <u>locally</u> Applicable National Register Criteria: <u>A</u>	-		
relation to other properties: <u>locally</u> Applicable National Register Criteria: <u>A</u> Criteria Considerations (Exceptions) : Areas of Significance: <u>Ethnic Heritage</u> :	- Black	cant Dates:	1941
relation to other properties: <u>locally</u> Applicable National Register Criteria: <u>A</u> Criteria Considerations (Exceptions): Areas of Significance: <u>Ethnic Heritage:</u> Education	- Black	cant Dates: _	1941
relation to other properties: <u>locally</u> Applicable National Register Criteria: <u>A</u> Criteria Considerations (Exceptions): <u></u>	- Black	cant Dates: _	1941

Douglass High School	Loudoun County, Virgini
9. Major Bibliographical References	
X See continuation sheet.	
Previous documentation on file (NPS):	
<pre>preliminary determination of individual list requested. previously listed in the National Register previously determined eligible by the Nation designated a National Historic Landmark recorded by Historic American Buildings Surv recorded by Historic American Engineering Re</pre>	al Register
Primary Location of Additional Data:	
<pre>x State historic preservation office Other state agency Federal agency Local government University Other Specify Repository:</pre>	
10. Geographical Data	
Acreage of Property: 9.9 acres	
UTM References: Zone Easting Northing Zone Easting	asting Northing
A <u>18 278860 4331620</u> B <u>18 23</u> C <u>18 279141 4331860</u> D <u>18</u> 23	79120 4331665 79062 4331900
See continuation sheet.	
Verbal Boundary Description: See continuati	on sheet.
The boundary of the nominated proper whose vertices are marked by the followin 18/278860/4331620, B 18/279120/4331665, C 18/279062/4331900.	ng UTM coordinates: A
Boundary Justification: See continuation s	heet.
The boundaries include the 1941 scho plus the vocational/craft shop located to the r noncontributing modern metal annex building. T acre lot historically associated with the school	ear of the school, and a he boundaries define the 9.9-
11. Form Prepared By	
Name/Title: Teckla H. Cox, Planner/Richard Ca	lderon, Planner/Architect
organization: Loudoun Cty. Dept. of Planning	Date: August 30, 1991
Street & Number: 750 Miller Drive S.E.	Telephone: (703) 777-0246
City or Town: <u>Leesburg</u>	State: <u>VA</u> ZIP: <u>22075</u>

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Section number 7 Douglass High School, Loudoun Co., Va. Page 1

SUMMARY ARCHITECTURAL DESCRIPTION

The Douglass High School was built in an institutional rendition of the Colonial Revival style. Additional land was acquired in 1953 and additions were built in 1954 and 1960. It is located on 9.9 acres in what was a rural area on the outskirts of Leesburg, the county seat of Loudoun County. The school property is now a landscaped recreational green space in what has become a commercial area. The school building with its additions is a brick building with a metal roof as is the shop (now used for classrooms) which was built the year after the school. There is also a noncontributing metal classroom building on the property.

DETAILED DESCRIPTION

Douglass High School, constructed in 1941, is a one-story brick building with wood mullioned windows and doors, and a standing-seam sheet metal gable roof. The dark red brickwork of the main part of the building is laid in two-course mixed garden wall bond. The gymnasium addition is laid in five-course American bond. Flanking the central block are projecting wings with gabled ends facing the front. Inside the building all walls and ceilings were plastered and both doors and fittings were of wood as was the floor. The structure was well built and has held up gallantly.

The original high school's 9,400-square-foot floor plan is effective while simple. Two classroom wings, 24 by 85 feet, flank a 56-foot-wide central hall/gymnasium/stage. Each wing contains two large classrooms separated by a smaller room, originally serving as the principal's office and a typing/secretarial classroom, with water fountain and toilets located at the far end of each wing opposite the stage. Large banks of windows to the east and west illuminate the classrooms. The hall/gymnasium is lit by two banks of windows to the north. The original building had three entrances, the main one being from the north through a vestibule into the hall/gymnasium and the others located on either side of the stage to the south.

Effective simplicity is also noted in the high school's exterior. The north elevation is gracefully composed of the solid gable walls of the flanking classroom wings which project ten feet from the body of the building. These two solid masses define a shallow courtyard and lend dignity to the building's main entrance. The dark red brick gables also provide a foil to the more delicate banks of white-painted six-over-six mullioned windows and the white wooden entry pavilion. The horizontal character of the brickwork provides another foil to the 2:1 vertical character of the windows. A 10:12 roof pitch further differentiates the classroom wings from the central space and helps to disguise the structure's inauspicious breadth:depth:height ratios. The east and west elevations, while composed mainly of glass, are very competent, particularly in the design play of the vertical windows and standing-seam metal roofing pans with the essentially horizontal lines of the overall composition.

Additions to the school include classrooms that were added to the rear of the original structure in 1954, and a 1960 gymnasium built behind these. Both additions are of brick which matches that of the original part of the building.

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Section number 7 Douglass High School, Loudoun Co., Va. Page 2

The classroom addition on the west side continues the roofline of the original west wing. However, the east side of the addition has a flat roof. The gymnasium has a rounded roof. Between the gymnasium and the classroom addition is a low brick connector with a flat roof.

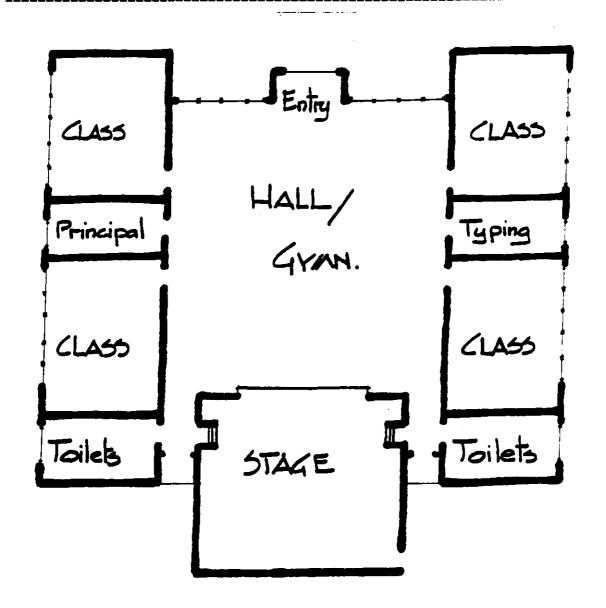
Some mention should be made here of the detached vocation/craft shop situated to the west of the main building. The shop was an important component of the educational program and was built shortly after the high school was completed. The building, which measures 32 by 62 feet, consists of a gabled rectangular classroom lit by a series of paired six-over-six windows that match those of the high school, and is roofed with standing-seam metal at a pitch of 8:12. The vocational/craft shop was competently built and has held up very well. Although the shop does not exhibit the Douglass High School's compelling architectural synthesis, it contributes visually to the overall complex.

Ten, twenty, and certainly thirty years ago, the Douglass High School would have been considered a dated and far from noteworthy, yet puzzling building that mysteriously seemed to inspire affection among graduates, unlike the egg crate educational factories or the amorphous open-plan facilities built in those years. Puzzling also was the structure's ability to perform marvelously in a variety of unanticipated roles, such as its current use as an educational center for handicapped children. However, in the last years a revolution has occurred in critical perception regarding education and traditional/vernacular architecture. A critic today sees the Douglass High School as a self-effacing structure expressing a love of work and celebration, simplicity and subtlety, self-respect and neighborliness, personal humility, and pride in the friendship of others. The Douglass High School is both a truthful, while appropriately tactful, product and expression of the ethos that has charmed America, to which our nation has always aspired and which is the wellspring of our community life.

Richard D. Calderon, AIA

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NATIONAL REGISTER OF HISTORIC PLACES CONTINUATION SHEET

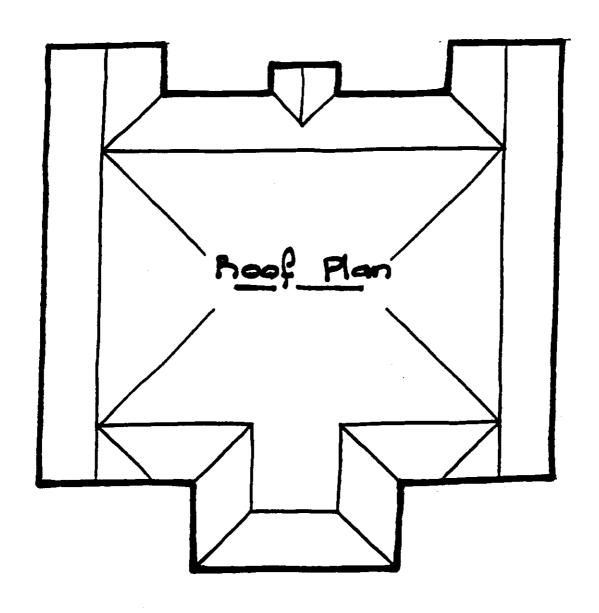


Douglass High School
Leesburg Virginia 1741
scale: 0 10' 30' 40'

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Leesburg Virginia 1941

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STATEMENT OF SIGNIFICANCE

The Douglass High School is significant locally as a tangible symbol of the sense of purpose and quiet tenacity of the black people of Loudoun County in their determination to secure a good secondary education for their children. Black citizens bought the land and presented it to the school board, who in 1953 bought additional land from a neighboring black family. The classroom and gymnasium additions of 1954 and 1960 respectively offered black students the opportunity for more varied classes. This opportunity in turn allowed the students of Douglass High to plan for higher levels of education than had been possible for previous generations.

The school was operated as the County's first and only black high school from its opening in 1941 until the end of segregated education in Loudoun County in 1968, at which time the building became a middle school. Its active alumni association has a number of prominent graduates who could not have reached their potential if Loudoun County's black citizens had not worked so hard to acquire the land and see that the school was built.

JUSTIFICATION OF CRITERIA

The Douglass High School is a focal point for all of its graduates and those who helped build and outfit it. It is a local symbol of what Loudoun County blacks accomplished through will and hard work, and its very active alumni association has planned a 50th anniversary celebration in 1991. The Douglass School is unique in Loudoun County as a tangible symbol of the black struggle for equal rights in education and as such is eligible for listing in the National Register of Historic Places under criterion A.

HISTORICAL BACKGROUND

Until the Douglass High School was built, Loudoun County provided secondary education to black students in quarters within the building known as the Loudoun County Training School. This building on Union Street in Leesburg housed the black elementary school on the ground floor and the high school on the second floor. The building was an antiquated frame structure with no proper safety devices. For example, the windows opening onto the fire escapes would not open, and an open oil drum was stored under the stairs. Only a very sparse curriculum was offered and the school was not accredited with the State of Virginia. No laboratory science classes were offered. There were not even any facilities for a home economics course because there was no equipment. Bus transportation was not offered to all students, so some had to live in Leesburg or their parents had to arrange to get them to the school. Those children who planned to go to college had to go to the boarding school for black high school students in Manassas in Prince William County, resulting in extra expense for their parents as the boarding school charged tuition.

In the 1930s the parent/teacher associations of all the black schools in the county formed the County-Wide League. Each school paid a \$6 per year membership fee. The league was formed as a body designed to take complaints or suggestions to the school board. The league was concerned about the inadequate

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HISTORICAL BACKGROUND (cont.)

secondary education for black students and in the late 1930s sought land to purchase for a school. In interviews, older black citizens who worked to acquire the land and get the school built explained that the league and all its members held bake sales, rummage sales, dances, ball games, field days, recitation programs, and any other fundraising activities they could think of to raise money. They have reported that they were not too proud to beg and received donations from both blacks and whites. Those interviewed said it took two or three years to get enough money to buy the land. Eight acres were found on the eastern outskirts of Leesburg, and Willie Hall, a successful black contractor in Middleburg, co-signed the note for the purchase. The Trustees of the County-Wide League purchased the land from W.S. Gibbons on November 4, 1939. Final transfer of the land from the league to the school board did not take place until December 16, 1940, when the black citizens sold the land to the school board for \$1 after a court determination that "such sale and conveyance will be for the best advantage and benefit of the colored citizens of said County and said County-Wide League of Loudoun County and ... ordered that the said sale be and the same was thereby approved and ratified by said Court...to execute and deliver the said School Board of Loudoun County, Virginia, and proper conveyance of the aforesaid land was further approved and ratified by said court."

In early 1940 the school board recommended to the Board of Supervisors of the county that it apply for a loan from the State Literary Fund, part of which would be used to build a new black high school. However, they were told that the Literary Fund had no money to lend and would not be able to consider a loan for twelve to eighteen months. Therefore, the County-Wide League retained Charles H. Houston of Washington, D.C., an attorney active in many civil rights cases (see Exhibit I), to represent them in bringing their complaints about the high school accommodations to the school board and to try to persuade the county to find the money to build the school building.

On March 16, 1940, Houston wrote to Mr. O. L. Emerick, then superintendent of Loudoun County schools (see Exhibit II). He pointed out the unsafe quality of the existing high school facility on the second floor of the Loudoun County Training School. He spoke of the inadequate curriculum, the lack of accreditation, and lack of bus transportation for all students. The school board had argued that no additional bus transportation could be provided since the school was already overcrowded. The board offered no solution to these problems. Houston pointed out the right of equal protection of the laws under the Fourteenth Amendment and legal procedure for dealing with the problem, suggesting that court action would be the final appeal. He emphasized that the county's black citizens were anxious to cooperate with the school administration and the school board. Certainly their efforts to secure land for a school building to donate to the school board illustrated a cooperative spirit. Houston urged Emerick to revise the budget and provide funds for the construction of a new high school.

In April, Houston and a group of citizens appeared again before the school board asking for better facilities for the students. As a result, the board asked for a supplementary appropriation from the Board of Supervisors of

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HISTORICAL BACKGROUND (cont.)

\$4,500 for two more teachers, work on the building, laboratory equipment, home economics equipment, furniture, and transportation. In May the superintendent reported that the Board of Supervisors had denied this request.

The black citizens of the county were amazingly patient but did not let themselves be forgotten and on December 10, 1940, the minutes of the school board noted the appointment of Charles F. Harrison as attorney to examine and approve in writing the title to "the lot of land being donated by the negro citizens of Loudoun County for use as a high school site at Leesburg and that the said Charles F. Harrison is hereby designated by this board to make the necessary certificate in connection with the application of this board for a loan of \$30,000 from the State Literary Fund of Virginia for use in erecting a colored high school." On January 14, 1941, the minutes stated "That the Superintendent of Schools be hereby authorized and directed to advertise for bids for the construction of...the unit for the Leesburg colored high school." The February 19, 1941, minutes show that the proposal of the Taylor Manufacturing Co. of Farmville, Virginia, was accepted to build the school for \$35,438. In March supplementary loans were requested from the Board of Supervisors and contracts were signed.

The May 13, 1941, minutes noted that teachers were authorized for the new school and were hired. In June the board authorized water connection to the school. In September the school opened for partial service although both buildings were still used for a short while. John Tolbert, former vice-mayor of the town of Leesburg, drove a school bus at that time and remembers driving students from the old building to the new building for two classes and then returning them to the old building.

The name for the school was chosen by the citizens who with quiet persistence and great cooperation with the county had supported the effort to have a high school for their children. It was named for Frederick Douglass, a former slave who became a prominent abolitionist and who shared these qualities. Born on a Maryland plantation in 1817, Douglass later escaped to New England where he was engaged by the Massachusetts Anti-Slavery Society in Nantucket as a lecturer. He took part in political action campaigns, and conferred with John Brown and Abraham Lincoln. He traveled in Great Britain and Canada, always pressing for abolition. He was an eminently practical man and worked for suffrage and civil rights. He championed the cause of all women by working for women's suffrage as well as suffrage for freed slaves. He urged education as a means for blacks to succeed as free men and many of his ideas were used by Booker T. Washington at Tuskegee Institute. His own dogged determination and pragmatic approach were mirrored in the acts of the black people of Loudoun County who worked so hard to get the Douglass High School built.

The school board only provided the barest necessities, such as desks, for furnishing the school, so again the black parent/teachers associations and the County Wide League went to work to earn money, this time for furniture. They provided the chairs for the auditorium. Tolbert recalls that he gave money for several chairs. The parents and other school supporters also provided

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HISTORICAL BACKGROUND (cont.)

curtains, laboratory equipment, a piano, equipment for a home economics department, equipment for a band, and numerous other items. The school board arranged a loan from the State Literary Fund for \$2000 to build a shop of cinderblock and brick and students did some of the construction work. A number of contributions came from white community individuals and businesses.

Eventually the school was accredited; more land was acquired so that the school could be enlarged by the addition of more classrooms and a full gymnasium, and Douglass High School served the county as the only black high school until desegregation of all schools in the 1968-69 school year. The building then became a middle school and finally an alternative school (for students with varied problems) and a special education school both of which are still accommodated in the buildings. The Douglass Community Center shares the space with the Douglass Community School at the present time (see exhibit 3).

The public continues to support the Douglass School as it has always done. Much work has been done to the ten-acre lot that now contains the buildings which make it an oasis surrounded by the modern development that has grown up around it. This work has been done by civic groups of all types or has been accomplished by donations of time or money by individuals. For example, much of the landscaping and treeplanting, particularly around the periphery to screen the facility, was done by the Leesburg Garden Club, a member club of the Garden Club of Virginia, which won the Commonwealth Award for its work. A fitness trail, picnic tables, and outdoor play equipment have been installed. The Douglass School continues to represent a successful community effort and those of its early supporters who still remain, its alumni, and the School Board, would like to see it continue serving the needs of the community in the future.

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Section number 8 Douglass High School, Loudoun Co., Va. Page 9 HISTORICAL BACKGROUND (cont.)

ENDNOTES

- 1. Loudoun County Deed Book 11K, Folio 81, Loudoun County Courthouse, Leesburg, Va.
- 2. Charles H. Houston, Letter to O. L. Emerick, 16 March 1940.
- 3. Loudoun County School Board, Minutes, 10 December 1940, Loudoun County School Board Annex, Leesburg, Va.
- 4. Ibid., 14 January, 1941.
- 5. Ibid., 19 February 1941.
- 6. Ibid., 12 March 1941.
- 7. Ibid., 13 May 1941.
- 8. Ibid., 10 June 1941.

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EXHIBIT 1

CHARLES HAMILTON HOUSTON

A civil rights advocate and respected member of the Washington, D.C. Bar, Charles Hamilton Houston dedicated his career to improving equality and opportunity for all U.S. citizens.

Houston graduated Phi Beta Kappa from Amherst College in 1915, at the age of 19. After a brief period of teaching English at Howard University, Houston served his country as an overseas artillery officer during the First World War. Upon his return, Houston attended the Harvard School of Law, earning his juris doctorate in 1923. To supplement his training and education, Houston also attended the University of Madrid where he received another academic honor, Doctor of Civil Law, in 1924.

Houston began practicing law in Washington, D.C. in 1924, a partner with the firm of his father, William Houston. The partnership of Houston and Houston ended in 1929, when Charles Houston accepted the position of Vice Dean of the Howard University School of Law. During his tenure, from 1929 to 1935, Houston was responsible for transforming Howard University's law program from an unknown cluster of courses to a fully accredited and respected, nationally prominent institution.

From 1935 to 1940, Houston served as special counsel to the National Association for the Advancement of Colored People, then headquartered in New York. As the architect of the legal program of the Association, Houston again added prominence, stature, and acceptance to a fledgling national organization.

When Houston returned to private practice he continued to champion public causes that captured his attention. He served as a member of the Board of Education of the District of Columbia; as a member of the President's Committee on Fair Employment Practices; as vice president of the American Council on Race Relations; as Vice President of the National Lawyers Guild; and continued as a member of the Board of Directors and National Legal Committee of the NAACP.

Only through his vision, unselfishness, and devotion, can Charles Houston's career be measured. Houston laid the groundwork for equal educational opportunity for all. Before his death in 1950, virtually no important case involving civil rights was won in this country without the counsel and advice of Charles Hamilton Houston.

James Edward Sved, Historian Virginia Department of Historic Resources, 1992.

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EXHIBIT 2

COPY

March 16, 1940

Mr. O. L. Emerick, District Superintendent, Loudoun County Public Schools, Leesburg, Virginia

Dear Mr. Emerick:

Word reaches me in Washington that the Loudoun County Board of Education has recommended to the Board of Supervisors an application for a loan from the state literary fund of \$78,000.00, of which \$40,000.00 is to be allocated to building a new high school for Negroes on the site which the Negro citizens are now buying out of their own funds; but that the Board of Education made no recommendation for increased transportation for Negro children.

1. I wish to express my appreciation to the Board for its action in requesting a loan from the literary fund. But I wish on behalf of the Countywide League and the Parent Teachers Association to point out that we are advised that the literary fund income is exhausted, that no applications for loans are now being received, and that it may be a year or eighteen months before any more loans will be made. Even then there is no assurance that the Loudoun County application, if made, will be granted, because we do not know what applications are ahead of the Loudoun County application, or for how much. That puts a new high school off to 1942 at the earliest, so far as present prospects of a loan from the literary fund are concerned.

That does not obviously answer or meet the needs for better high school education now. It does not answer the risk which Negro high school children run everyday in attending school on the second floor of the Loudoun County Training School Building, where the window opening on the fire escape does not even have sash cords, and the oil soaked floor and open oil drum under the steps leading to the second floor constitute a veritable death trap in case of fire. Parents who have children attending the present high school cannot wait until 1942 to have conditions cleaned up. White parents would not tolerate such conditions—they would not have to. And I must repeat what I said to the Board of Education that Negro parents love their children just as much a white parents love theirs.

I have advised my clients that in my judgement you and the Board of Education can be enjoined from continuing to hold school in a building dangerous to life and limb, and that they are entitled to call on you and the Board of Education to see that a safe place for the students is provided at once, either by making the present building safe or by moving the students to other quarters. I have advised them that after notice, which I herewith give you formally on their behalf by sending this letter by registered mail, you and the Board of Education are personally liable for any harm which may befall the

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children from continuing to force them to go to school in a death trap. I herewith respectfully call on you and the Board of Education, and the several members thereof, to provide immediately a safe place of instruction for the Negro students now going to school in the Loudoun County Training School building.

2. On the question of instruction and courses, which is a matter under your direct and personal supervision, I call your attention again to the complete lack of equipment in the Loudoun County Training School building for any instruction in science, chemistry, physics, zoology and botany particularly. I call your attention to the fact that the Loudoun County high school is not even an approved school according to local state standards. I am respectfully requesting that immediate steps be taken to provide the present class with equipment equal to that provided for white students.

One parent whose daughter wants to go to college has been forced to take his daughter out of Loudoun County where he resides and pays taxes, and send her at his own expense out of the county to the Manassas Training School. He states that this is a great hardship on him. I have advised him that he is entitled to bring his daughter back to Loudoun County and tender her for entrance at one of the approved high schools in the county, or the county will have to make arrangements otherwise. This matter is going to come before you officials in a very short time, so I am sending this letter ahead in case you desire to seek legal advice.

- 3. Another parent whose daughter has graduated from the Loudoun County Training School high school course, is still within the school age but is unable to go to college, wants a home economics course for her daughter. This is being taught in the schools for white children but not in the schools which Negro children attend. I have advised this parent that she in entitled to have her daughter receive from you and the Board of Education a home economics course equal to that given the white children. As I stated before the Board of Education Tuesday March 12, 1940, I make no suggestion how this shall be done. It would be presumptuous on my part to attempt to usurp your functions as to how such course shall be given, so long as you accord the Negro student the equal protection of the law. This matter will also come before you officials in the near future, and I raise the point in this letter in case you should wish to confer with the Commonwealth Attorney or other counsel.
- 4. On the matter of bus transportation I understand that you and some of the officials take the position there is no necessity of providing more transportation for Negro students when the school buildings which Negroes attend are already overcrowded. As I pointed out to the Board of Education, the right of equal protection of the laws under the Fourteenth Amendment is a personal right, and the individual Negro child denied bus transportation which is given to white children is not concerned with overcrowded schools. He is concerned with his own individual education. Overcrowded schools is no answer to the request of Negro children to be furnished bus transportation to schools on the same basis as the white children. With almost half of the Negro school

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population of Loudoun County out of school, the County cannot answer walk or stay home.

One parent who has no transportation for his child is paying the boy's transportation into Leesburg out of his own pocket. I understand that white buses run in routes which by transferring from one bus to another would take him all the way from his home into Leesburg. I have advised him that in my opinion after proper demand on the county officials he can sue the county for the cost of his transportation: by county I am not referring to any particular agency of the county for I shall have to study that point further. And I believe he can sue you and the board members for the damage and inconvenience and denial of his Federal right of equal protection under the Fourteenth Amendment and the United States Code, title 8, sections 41 and 43.

The actual procedure by which such parent and child can perfect his right of action is to present the child for passage on the school bus in question, let him be refused by the driver, bring the case to you and the board and then go to the courts. Perhaps as a test case you can waive the necessity of actual presentation and the administrative follow-up, and get right to the main question: the obligation of the county to furnish Negro school children bus transportation on equal terms with white children similarly circumstanced.

Another patron is being given \$8.00 per month for transportation which actually costs him \$5.00 per month for his child, and which would cost him nothing if his child were taken on the bus which white children ride. I have advised him that in my opinion he can claim reimbursement for the money spent out of his own pocket.

- 5. I have stated and I repeat that the citizens are anxious to cooperate with you and the Board of Education, and all county and state officials. They do not expect however the price of such cooperations to be the abandonment of their constitutional rights. I regret exceedingly that at the hearing before the Board of Education Tuesday, March 12, you saw fit to consider my statement that the citizens are determined to obtain their constitutional rights by all lawful means as a threat. It was not a threat, but it was a plain statement that the Negro citizens want better education and equal education opportunity for their children who are now in school. This question of equal education is not theoretical. A solution years from now will not advantage the present Negro students. The individual Negro student now in school is not interested except generally in what may come after him. He wants his own individual chance to life and happiness, and to go forth in the community prepared to make himself a useful citizen and to meet the competition for jobs with other citizens white and black.
- 6. I have written you at this length because I wish to lay down our premises of action. I wish to express my understanding of the difficulties of your problem, but I do not wish to see the solution of these difficulties further saddled on the shoulders of the Negro students who have been getting the short end all these many years.

I sincerely trust the Board of Supervisors will approve the budget recommended and will send it back for further action on the question of bus

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transportation for Negro students. I further hope that of its own motion the Board of Education and you will either revise the budget or submit a supplementary budget providing for equal transportation of Negro students.

On the question of taxation, I repeat what I said to the Board of Education that it is cheaper in the long run to educate than to punish; to build schools rather than hospitals, insane asylums and jails; to pay teachers rather than policemen: and to educate the citizens adequately rather than to cheat on their education and swell the relief rolls.

I also say in a very sincere way that I trust the Board of Supervisors and the Board of Education will face the problem squarely that Loudoun County is going to have to spend more money on Negro children, either providing such education or fighting against providing it. You know my hope that the money will be spent on education directly, with all the benefits which will come back from a better educated citizenry. I made it clear that we do not want to take any education away from the white children. We do not want white children to have less education, but rather more education in the certain knowledge that the more education they get the more they will be tolerant and understanding of the ambition of Negroes to make themselves better citizens.

7. I trust that because I write frankly you will still believe me sincere in saying I have the utmost respect for you and the members of the Board of Education personally, and for all county officials. You are not responsible for the conditions as you find them, nor am I. It seems to me that the only thing to do is to look forward and not backward, and to see where we can go from here.

In this regard I dare hope that you will accord my clients full liberty of action within the law without thinking that they are personally antagonistic to you.

8. Since this is in essence a public document, in the sense it is a letter to a public official about the performance of a public function, I am taking the liberty of sending a copy to the Board of Education and to the Board of Supervisors. I am doing everything in my power to show all officials concerned that we have nothing concealed, nothing to hide. We seek no favors. We want simple justice, the rights which are ours according to the law of the land.

Finally I would call your attention to a significant fact. Practically all my clients themselves were born in Loudoun County. They are not floaters, although under the Fourteenth Amendment a floater temporarily in Loudoun County

has the right to equal protection of the laws. Many of my clients have been paying taxes in Loudoun County all their adult life, and in quite a few cases they have property which has come down to them either immediately after or even before the Civil War. The educational opportunities I am talking about will go to Loudoun County's own native citizens: Loudoun County born and bred. Loudoun County will either reap the benefit of giving their children better education, or it will pay the cost of keeping their ignorant, dependent members

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of the community.

With sincere regard and respect, I remain,

Yours very truly,

Charles H. Houston, Attorney for the County-wide League, and the Parent-Teachers Association of Loudoun County.

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EXHIBIT 3

Subject: History of the Douglass Community Center

The Douglass Community Center was first opened on September 1, 1976. An agreement was reached with the Loudoun County School Board to operate this center in an existing school. This was made possible because this school does not have any afterschool programs. The Community Center consisted of the gymnasium, one annex building, two classrooms and the office area. Total square footage was 10,545. It must be noted that all daytime programs were only allowed to be operated in the annex building. The gymnasium and classrooms were only to be used after 3:00 pm when the school day was over and on weekends. The status for the use of the gymnasium and classrooms have remained the same over the years. Staff consisted on one (1) coordinator, one (1) thirty hour aide, one (1) 20 hour aide and one (1) fifteen hour maintenance position.

During the fall of 1978, the Douglass Community School had grown and both classrooms were taken back for school use. However, the school allowed the existing locker rooms to be converted to classrooms. Space was approximately the same.

The summer of 1979 saw the development of the 10-acre Douglass Community Center Park. It should be noted that this park was built with donated funds and community support.

The fall of 1981, the metal annex building was completed at the Center. This building was built with the Leesburg share of the existing bond monies that were delegated for a community park. The Douglass Community School, because of increased growth, had to take back one on the locker facilities.

The fall of 1984, the School Board again requested space, this being the other locker room facility. This room held the gameroom at the Community Center. This was the last available space appropriate for a gameroom. Currently there are no facilities for a gameroom.

Presently the Community Center has a total of 11,880 square feet of space for community use. Operating staff maintain the Center seven days a week, consists of one (1) Supervisor, one (1) 37.5 hour Aide III, two (2) twenty hour Aide I's and one (1) 37.5 hour maintenance position.

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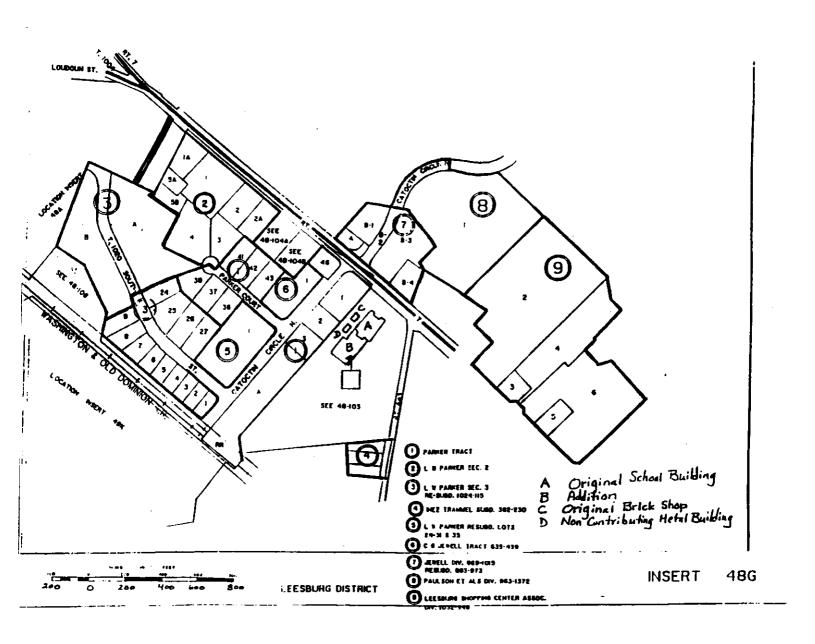
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LOCATION OF PHOTOGRAPHS

Douglass Community School Building Map

