

IN THE SUPREME COURT OF FLORIDA

CASE NUMBER: SC18-67

CITIZENS FOR STRONG SCHOOLS,  
INC., *et al.*,

Lower Tribunal Cases: 1D16-2862;  
372009-CA-00453

Petitioners,

vs.

FLORIDA STATE BOARD OF  
EDUCATION, *et al.*,

Respondents,

and

CELESTE JOHNSON, *et al.*,

Intervenor-Respondents,

\_\_\_\_\_ /

**THE URBAN LEAGUE OF GREATER MIAMI'S  
MOTION FOR LEAVE TO FILE *AMICUS CURIAE* BRIEF**

Pursuant to Florida Rule of Appellate Procedure 9.370(a), the Urban League of Greater Miami seeks leave to file an *amicus curiae* brief in support of Respondents, the Florida State Board of Education. As grounds for this motion, the Urban League respectfully submits as follows:

**I. The Urban League's Interest In This Case**

The Urban League of Greater Miami is a non-profit community-service organization in Miami-Dade County. It provides services in employment,

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childcare, senior citizen services, housing, economic development, training, community service, political advocacy, and education. The Urban League focuses on women and children and on achieving academic excellence in the community. The Urban League's historical emphasis has been enabling black children to reach their fullest potential. For example, the Urban League provides a financial learning center and computer lab equipped to provide youth and adult education programs such as testing preparation, academic enrichment, computer literacy, and other assistance to parents to enhance their ability to help their children succeed in the classroom.

The issue in this case is whether the State of Florida has made adequate provision by law for a system that *allows* students to obtain a high quality education as mandated by the Florida Constitution. The answer is amply demonstrated by Miami-Dade County's success. This is an issue of great importance to the Urban League because the Court's ruling will have a significant impact on the communities and populations it serves. The Urban League has a substantial interest in preserving Florida's education system to ensure that children in the Miami-Dade County Public school system—especially children of color—have access to high quality education.

## **II. The Issues To Be Addressed in the *Amicus* Brief**

The Urban League's *amicus* brief will address the overwhelming evidence that Florida's education system is indeed constitutionally adequate. As discussed in more detail in the *amicus* brief, Miami-Dade County Public Schools—the fourth largest school district in the country—represents the success of Florida's school system across a variety of metrics. Therefore, judicial intervention is neither appropriate nor necessary.

## **III. The Urban League's *Amicus* Brief Can Assist The Court**

The Urban League is in a unique position to provide insight into the successes of the Miami-Dade Public School System as it provides services to the minority and low-income students of the district. The Urban League's experience implementing initiatives and programs that help children in the Miami-Dade County Public school system achieve academic excellence will assist the Court in the disposition of this case. Therefore, the Urban League seeks leave to participate as *amici curiae* in this appeal.

## **IV. Position of Other Parties**

The undersigned has contacted counsel for the parties and Petitioners do not oppose the filing of an *amicus* brief to the extent it relies on information in the Record on Appeal. Petitioners oppose the filing of an *amicus* brief to the extent it

relies on information outside the Record on Appeal. Respondents and Intervenor-Respondents represent that they do not oppose.

Date: July 30, 2018

Respectfully submitted,  
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### **CERTIFICATE OF COMPLIANCE**

I certify that this brief complies with the font requirement of Florida Rule of Appellate Procedure 9.210(a)(2) and is typed in Times New Roman 14-point font.

By: /s/ Raoul G. Cantero  
Raoul G. Cantero

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of this motion has been furnished by electronic mail on July 30, 2018, to the following counsel of record:

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