

marches" and "civil rights demonstrations" organized by one or more or all of the defendants and others which were conducted without parade permit. During the course of these latter marches and demonstrations there were many civil disturbances resulting in the arrest of 1,327 persons.

6. During the months of June, July and August, 1965 one or more or all of the defendants and others organized and participated almost daily in a "vigil" before the City Hall and other public buildings in the City of Chicago in numbers varying from ten to several hundred. During the latter part of 1965 and during the winter and spring of 1966 one or more or all of the defendants and others organized and participated in a number of other demonstrations in various areas of the City of Chicago in numbers varying from several to several hundred persons.

7. During the years 1965 and 1966 on the occasion of each of the marches or demonstrations referred to in paragraphs 5 and 6 above, the Police Department of the City of Chicago in no way interfered with but rather affirmatively *assisted* and *protected* all who were engaged in said marches and demonstrations who conducted themselves in a peaceful and orderly manner.

8. In January of 1966 one or more or all of the defendants and others advised officials of the City of Chicago, and the news media particularly, that they intended to embark on a program of developing "creative tension" in the City of Chicago during the summer of 1966 in order to clearly articulate to the people of the metropolitan area of Chicago and of the nation as a whole the objects of their petition for redress.

9. During the months of June and July, 1966 in several areas of the City of Chicago, where one or more or all of the defendants and others were actively engaged in organizing the people of specific communities, namely, the Near West Side, Wabash, Lawndale, Englewood and Woodlawn, to protect against alleged violation of their civil rights, and during a period of time when one or more or all of the defendants and others were making statements, issuing news releases, appearing on other communications media and publicly corresponding with public officials for the furtherance of their announced plan of "creative tension," major civil disturbances erupted in the aforesaid areas of the City resulting in damages in excess of

several million dollars to private and injury to 374 persons, includ

10. In order to contain the sev of Chicago, it became necessary f sist the police in containing the disturbances over 536 persons w

11. During the months of Jul dates of concern are set forth mor (plaint) one or more or all of th upon a procedure of organizing individual neighborhoods of the C

12. The pattern of the demons number of persons, usually severa one or more or all of the defend public area of a specific neighb chanting slogans, they proceed fr sidewalks of the involved commun in the neighborhood, where they prayers in furtherance of their ob

13. This procedure has been f the general area of 55th Street a Chicago, on the 23rd and 24th d day of August, 1966; in the Bog of 79th Street from Western Aven Chicago, on the 12th day of Aug August, 1966; in Jefferson Park, lo Avenue and Milwaukee in the Ci August, 1966; in Bridgeport, loc Street and Lowe Avenue, in the C and 22nd days of July, and on th of August, 1966; in Marquette Par and Kedzie Avenue, in the City of and 31st days of July, 1966, and o 1966; in Cragin area, located in th and Fullerton Avenue, in the City 7th days of August, 1966; all in of Chicago.

14. On the 14th day of August,

tors, each led by one or more or all of the defendants, went into three separate neighborhoods, Gage Park, Bogan and Jefferson Park. The neighborhoods are separated from each other by substantial distance and the times of the demonstrations were either simultaneous or overlapped.

15. On that date, while the several demonstrations were going on in the three separated neighborhoods, in still another neighborhood adjoining the Bogan neighborhood a severe civil disturbance involving the same subject matter arose in Marquette Park involving several hundred participants.

16. On the 16th day of August, 1966, six groups of demonstrators, each led, convened or organized by one or more or all of the defendants, went to six separate locations in the downtown area of Chicago, demonstrated and held prayer vigils at these locations. On the same date six groups of demonstrators, each led, convened or organized by one or more or all of the defendants, proceeded to the Jefferson Park neighborhood, arriving as darkness fell and proceeded to demonstrate until after midnight.

17. In each of the demonstrations set forth above in Paragraphs 13, 14, and 16 above except with respect to those marches and demonstrations held in the downtown area on August 16, 1966, large crowds of persons other than the participants in the march, varying in size from several hundred to several thousand people, gathered along the line of the march carrying signs, hooting, throwing rocks, firecrackers and other missiles at the marchers endangering the persons and property of the marchers and other citizens. Several dozen automobiles owned by the marchers and other citizens were burned or in other ways substantially damaged. Access to the sidewalks was denied to non-participating citizens, the normal flow of traffic both pedestrian and vehicular was obstructed, substantial damage was done to private property along the routes of the march and 177 persons were arrested.

18. During each of the marches and demonstrations referred to in Paragraphs 13, 14 and 16 above, the Police Department of the City of Chicago in no way interfered with but rather affirmatively assisted and protected all who were engaged in said marches and demonstrations who conducted themselves in a peaceful and orderly manner.

19. During the period of all of the over 200 demonstrations set

Appendix E

forth above in Paragraphs 5, 6, 13, 14, 15 and 16, the Police Department of the City of Chicago was notified of the location and extent of the demonstration planned on only verbal notice in writing. On no other occasion was notice given which was timely and verifiable.

20. This failure to give adequate notice to the Police Department has occurred despite assurances made by the Rev. Dr. King and others that it would be given.

21. Requests that adequate notice be given to the Police Department have been made repeatedly by Superintendent of Police recently as August 4th, 1966, Rev. Dr. King agreed that adequate notice has been received. The failure to give such notice to the Police Department of the City of Chicago has resulted in a waste of manpower which could and would have been used for preventive police work as well as crime detection in the City.

22. In the various demonstrations occurring in the City referred to above in Paragraphs 13, 14, 15 and 16, the Police Department in order to protect the marchers from injury, and in order to protect the persons and property of the citizens of the City of Chicago were neither participating in the marches or in the demonstrations of the marchers, for the Police Department to assign the full number of men to special duty for the specific purpose of protecting the marchers:

Gage Park	556
Bogan	1732
Jefferson Park	258
Marquette Park	2564
Belmont-Cragin	1926
Bridgeport	88

23. The assignment of officers to this special duty has resulted in a reduction from their normal duty posts and reduced police protection in areas where they would, under normal conditions, be performing their substantial degree.

24. The reduction of police protection in the City of Chicago other than those where the demonstrations were taking place has resulted in a substantial increase in the crime rate in these periods of the demonstrations. The increase in the number of incidents directly connected to the demonstrations

persons and property in the areas in which the demonstrations were being conducted is substantial.

25. The effective police patrol force during a normal period of a patrol watch is approximately 1,020 men, exclusive of detectives, traffic officers, and juvenile officers.

26. The burden placed upon the personnel of the Police Department to protect marches conducted at simultaneous times in widely separated areas of the City, as on the 14th day of August, 1966, in Gage Park, Bogan, and Jefferson Park is demonstrated by the fact that 1,279 policemen were assigned for special duty protecting the marchers on that date.

27. Although it has been requested of defendants that they cease and desist from placing this unreasonable burden on the Police Department of the City of Chicago and the rights of other citizens of the City to have their persons and property protected by the City, the defendants have continually refused and failed to do so and threatened, not only to continue their demonstrations in said unwarranted and injurious manner, but to expand the demonstrations into many other neighborhoods at simultaneous times.

28. The City of Chicago and the Police Department have been informed that the defendants intend to proceed with this course of action forthwith.

29. If defendants are permitted to proceed with simultaneous marches, it will be impossible for the Police Department of the City of Chicago to protect the defendants, the marchers, public and private property and the life and property of the more than 3½ million citizens of the City of Chicago, who are not participating as marchers or as protestors to the marches, from the clear and present danger of riot, civil disturbance, and the deleterious effects of unreasonably overburdened police duties.

30. The defendants' actions during the past month and particularly their actions on the 14th and 16th days of August, 1966, and their announced intention to expand the demonstrations into many neighborhoods at simultaneous times, constitute a clear and present danger to the order, peace and quiet, health, safety, morals and welfare of the City of Chicago.

31. The action proposed by the defendants as outlined above is an unreasonable, unwarranted and unlawful means of citizens' petition for redress of alleged grievances.

32. Plaintiffs state that none in the past or are now or will be deprived of their constitutional rights as citizens of the United States or of the City of Chicago by any action of the defendants, their agents, officers or servants.

33. Plaintiffs recognize that the citizens of the United States have the right to petition for redress of grievances in furtherance of that right to engage in reasonable demonstrations to bring about such redress.

34. Plaintiffs state that the complaint does not constitute a petition for redress of grievances of the United States or of the City of Chicago.

35. If defendants continue their actions in many and widely separated areas of the City of Chicago at simultaneous times, the Police Department, during peak traffic hours, will be unable to protect the public sidewalks will be blocked to pedestrian and vehicular, will cause irreparable damage will be done to the City of Chicago in public in general.

WHEREFORE, plaintiffs ask that the Court grant this petition issue immediately without delay, the filing of this complaint; that a permanent injunction be made permanent against the defendants LUTHER KING; REV. JAMES BEVEL; REV. ANDREW J. YOUNG; REV. ELBERT RANSOM, also known as ELBERT RANSOM; REV. LIAM ALVIN PITCHER; in and for the SOUTHERN CHRISTIAN LEADERSHIP CONFERENCE; CO-ORDINATING COUNCIL OF SOUTHERN CHRISTIAN LEADERSHIP CONFERENCE; and THE OAKLAND COMMUNITY IMPROVEMENT; and all of their agents, employees, persons who have, may now have, or act with them, or as individuals participating in unreasonable actions for the redress of alleged grievances.

(A) From organizing, conducting

assembly, gathering or meeting on public property in more than one specific area of, or location in the City of Chicago on any given date.

- (B) From conducting, organizing or participating in any such march, assembly, gathering or meeting on public property unless such march, assembly, gathering or meeting is limited to such numbers as will not obstruct traffic, either vehicular or pedestrian, in an unreasonable manner, and, in any event, such march, assembly, gathering or meeting shall be limited in size to 500 persons or less.
- (C) From conducting, organizing or participating in any such march, assembly, gathering or meeting on public property unless the Police Department of the City of Chicago has been given notice in writing of the location, number of people participating, and the names of the organizers of any such march, meeting, gathering or assembly, its route, and time of inception, at least twenty-four (24) hours prior to its inception.
- (D) From conducting, organizing or participating in any march, meeting, assembly or gathering on public property in the City of Chicago except during daylight hours and at times other than peak traffic periods (7:30 A.M. to 9:00 A.M. and 4:30 P.M. to 6:00 P.M.)

Plaintiffs, CITY OF CHICAGO, a municipal corporation, and ORLANDO W. WILSON, Superintendent of the Police Department of the City of Chicago, further pray for such other and further relief as the court in its discretion deems meet and equitable in the premises.

CITY OF CHICAGO, a municipal corporation,

By _____
RAYMOND F. SIMON, Corporation Counsel

ORLANDO W. WILSON
As Plaintiff and as agent for the City of
Chicago in this behalf.

Appendix E

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STATE OF ILLINOIS)
COUNTY OF COOK)
ORLANDO W. WILSON,
and says that he is the Superintendent of the
the CITY OF CHICAGO,
the plaintiffs in this cause,
in this behalf, he has read and
knows the contents thereof
in fact.

SUBSCRIBED AND SWORN
before me, this _____
day of August A.D. 1966

Notary Public