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WILLIAM A. KEEFER  
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Southern District of Florida

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF FLORIDA

**97-1671**

**CIV-KING  
MAGISTRATE JUDGE  
BROWN**

UNITED STATES OF AMERICA, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 METROPOLITAN DADE COUNTY, )  
 FLORIDA, )  
 )  
 Defendant. )

Civil Action No.

COMPLAINT

Jury Trial Requested

Plaintiff, the United States of America, alleges:

1. This action is brought on behalf of the United States to enforce the provisions of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e, et seq.

2. This Court has jurisdiction of the action under 42 U.S.C. § 2000e-5(f) and 28 U.S.C. § 1345.

3. Defendant, Metropolitan Dade County, Florida, is a political subdivision of the State of Florida, created pursuant to the laws of the State of Florida.

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4. Defendant, Metropolitan Dade County, Florida, is a person within the meaning of 42 U.S.C. § 2000e(a) and an employer or an agent of an employer within the meaning of 42 U.S.C. § 2000e(b).

5. Defendant, Metropolitan Dade County, Florida, has discriminated against Jessica D. Glass, a Corrections Officer in the Defendant's Department of Corrections and Rehabilitation, on the basis of her sex, female, in violation of § 703(a) of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e-2(a), among other ways, by:

- (a) subjecting Ms. Glass to sexual harassment which adversely affected the terms, conditions, and privileges of Ms. Glass' employment; and
- (b) failing or refusing to take appropriate action to remedy the effects of the discriminatory treatment of Ms. Glass.

6. The Equal Employment Opportunity Commission (EEOC) received a timely charge, Charge Number 150-93-1820, filed by Jessica D. Glass in which she alleged that she had been discriminated against in employment on the basis of her sex by the Metropolitan Dade County Department of Corrections and Rehabilitation. Pursuant to Section 706 of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e-5, the EEOC investigated the charge, found reasonable cause to believe that sex discrimination in employment against Ms. Glass had occurred, attempted unsuccessfully to achieve through conciliation a voluntary resolution of the charge, and

subsequently referred the charge to the Department of Justice.

7. All conditions precedent to the filing of this suit have been performed or have occurred.

WHEREFORE, Plaintiff prays that the Court grant the following relief:

- (a) Enjoin the Defendant from failing and refusing to: (i) provide sufficient remedial relief to make whole the charging party, Jessica D. Glass, for the loss she has suffered as a result of the discrimination against her as alleged in this Complaint; and (ii) take other appropriate nondiscriminatory measures to overcome the effects of discrimination.
- (b) Award compensatory damages to Jessica D. Glass as would fully compensate her for injuries caused by the Defendant's discriminatory conduct, pursuant to and within the statutory limitations of Section 102 of the Civil Rights Act of 1991, 42 U.S.C. § 1981a; and
- (c) Award such additional relief as justice may require, together with Plaintiff's costs and disbursements in this action.

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JURY DEMAND


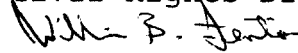
The United States hereby demands a trial by jury of all issues so triable pursuant to Rule 38 of the Federal Rules of Civil Procedure and Section 102 of the Civil Rights Act of 1991, 42 U.S.C. § 1981a.

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By:



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