

the basis of her sex, female, in violation of Section 703(a) of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e-2(a), by subjecting Watkins to sexual harassment that included:

- a. creating or maintaining a hostile work environment based on sex that adversely affected the terms, conditions and privileges of Watkins's employment;
- b. denying Watkins promotion to a full-time communications dispatcher position and discharging her from a part-time communications dispatcher position because she refused to accede to her supervisor's requests for sexual favors; and
- c. failing or refusing to take appropriate action to remedy the effects of the discriminatory treatment of Watkins.

6. The Equal Employment Opportunity Commission ("EEOC") received a timely charge of discrimination that was filed by Watkins against the City of Cairo Police Department on or about February 21, 2003 (Charge Number 280-2003-03253), in which she alleged that she had been discriminated against in employment because of her sex, female, by being sexually harassed, and denied promotion to a full-time permanent communications dispatcher position and terminated because she refused sexual advances from supervisors.

7. 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 of discrimination filed by Watkins, determined the evidence established that Watkins was sexually harassed and denied promotion and discharged in connection with the harassment, attempted unsuccessfully to achieve through conciliation a voluntary resolution of the charge, and subsequently referred the matter to the

Department of Justice.

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

WHEREFORE, plaintiff United States prays that the Court grant the following relief:

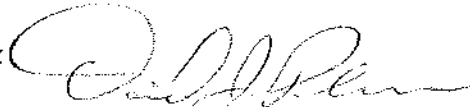
- (a) Enjoin the defendant, the City of Cairo, Illinois, from failing or refusing to:
 - (i) Provide sufficient remedial relief to Watkins to make her whole for the loss she suffered as a result of the discrimination against her as alleged in this complaint; and
 - (ii) Take appropriate nondiscriminatory measures to overcome the effects of the discrimination, including the implementation of an effective program to address and prevent sexual harassment against employees in the City's police department.
- (b) Award compensatory damages to Watkins as would fully compensate her for pain and suffering caused by the defendant City'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.
- (c) Award such additional relief as justice may require, together with its costs and disbursements in this action.

JURY DEMAND

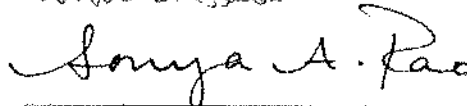
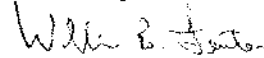
The United States hereby demands a trial by jury of all issues so triable pursuant to Rule 38 of the Federal Rules of Civil Procedure and Section 102 of the Civil Rights Act of 1991, 42 U.S.C. § 1981a.

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