

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION

UNITED STATES OF AMERICA,

Civil Action No.

Plaintiff,

v.

CALCASIEU PARISH SCHOOL BOARD,

Defendant.

Complaint

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. The Court has jurisdiction of this action under 42 U.S.C. § 2000e-5(f) and 28 U.S.C. §§ 1331 & 1345.
3. Defendant Calcasieu Parish School Board ("School Board") is a corporate, governmental body created pursuant to the laws of the State of Louisiana and is charged with maintaining parish public schools in Calcasieu Parish, Louisiana.
4. The School Board is a "person" within the meaning of 42 U.S.C. § 2000e(a) and an "employer" within the meaning of 42 U.S.C. § 2000e(b).
5. The School Board has discriminated against Dorenda Turner 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 failing or refusing to select her in June 1994 for an assistant principal position at Lake Charles Boston High School in Lake Charles, Louisiana, because of her sex.
6. The Equal Employment Opportunity Commission ("EEOC") received a timely charge of discrimination filed by Dorenda Turner on or about April 11, 1995, in which she alleged she had been discriminated against by the School Board by its failure to select her, because of her sex, to fill the June 1994 assistant principal opening at Lake Charles Boston High School. In accordance with 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 filed by Ms. Turner and found reasonable cause to believe that she was not selected for this position because of her sex. The EEOC attempted unsuccessfully to achieve through conciliation a voluntary resolution of the matter, and subsequently referred the matter to the Department of Justice.
7. All conditions precedent to filing suit have been performed or have occurred.

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

- (a) Enjoin the School Board from failing or refusing to provide sufficient equitable relief to make whole Dorenda Turner for the loss she has suffered as a result of the discrimination against her as alleged in this Complaint; and,

(b) Award compensatory damages to Dorenda Turner as would fully compensate her for injuries caused by the discrimination against her as alleged in this Complaint, pursuant to and within the statutory limitations of Section 102 of the Civil Rights Act of 1991, 42 U.S.C. § 1981a;

(c) Enjoin the School Board from failing to take appropriate measures to ensure individuals are selected for employment opportunities without regard to their sex, in compliance with Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e, et seq.

The United States prays for 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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