

RECEIVED

MAY 01 2007

Nov
ROBERT H. SHEMWEEL, CLERK
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE, LOUISIANA

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CITY OF VILLE PLATTE,

Defendant.

6:07-CV-0769 LO
JUDGE MELANCON
MAGISTRATE JUDGE HILL

COMPLAINT

Plaintiff, 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. ("Title VII").
2. This Court has jurisdiction over this action under 42 U.S.C. § 2000e-5(f) and 28 U.S.C. § 1345.
3. Defendant City of Ville Platte is a corporate, governmental body and a political subdivision of the State of Louisiana, established pursuant to the laws of the State of Louisiana.
4. Defendant City of Ville Platte 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. Defendant City of Ville Platte, in the Ville Platte Police Department ("VPPD"), has discriminated against Latonya Rideau 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), by failing or refusing to employ her as a full-time dispatcher and employing her instead only as a part-time dispatcher because of her pregnancy and keeping her in the status of part-time dispatcher for the duration of her pregnancy.

6. The Equal Employment Opportunity Commission ("EEOC") received a timely charge filed by Latonya Rideau (Charge No. 270 2005 00467) alleging, among other things, that she had been discriminated against in employment because of her sex (female) by the VPPD. Pursuant to §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 the allegations of sex discrimination in employment were true, attempted unsuccessfully to achieve through conciliation a voluntary resolution of the matters, and subsequently referred the charge to the United States Department of Justice.

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

WHEREFORE, plaintiff United States prays this Court to enter an order enjoining the defendant from failing and refusing to:

(a) Provide remedial relief sufficient to make whole the charging party, Latonya Rideau, for the individual loss she has suffered as a result of the discrimination against her as alleged in this complaint;

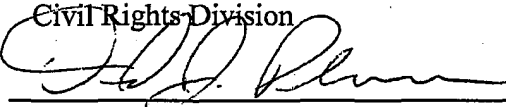
(b) Take other appropriate nondiscriminatory measures to overcome the effects of the discrimination.

The plaintiff prays for such additional relief as justice may require, together with its costs and disbursements in this action.

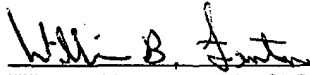
ALBERTO R. GONZALES
Attorney General

WAN J. KIM
Assistant Attorney General
Civil Rights Division


BY:



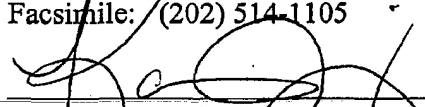
DAVID J. PALMER (DC Bar No. 417834)
Chief



WILLIAM B. FENTON (DC Bar No. 414990)
Deputy Chief



D. W. TUNNAGE (DC Bar No. 448204)
Trial Attorney
U.S. Department of Justice
Civil Rights Division
Employment Litigation Section
950 Pennsylvania Avenue, NW
Patrick Henry Building, Room 4036
Washington, DC 20530
Telephone: (202) 305-2789
Facsimile: (202) 514-1105



KAREN J. KING (LA Bar No. 23508)
Assistant United States Attorney
Western District of Louisiana
800 Lafayette Street, Suite 2200
Lafayette, LA 70501
Telephone: (337) 262-6618
Facsimile: (337) 262-6693

Attorneys for Plaintiff United States of America