

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

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UNITED STATES OF AMERICA,

Plaintiff,

v.

MECKLENBURG COUNTY,

NORTH CAROLINA,

Defendant.

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COMPLAINT AND DEMAND FOR JURY TRIAL

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. Section 2000e, et seq. ("Title VII").
2. This Court has jurisdiction over the action under 42 U.S.C. Section 2000e-5(f) and 28 U.S.C. Section 1345.
3. Defendant Mecklenburg County, North Carolina (hereinafter referred to as "Mecklenburg County" or "the County") is a political subdivision of the State of North Carolina created pursuant to North Carolina law.
4. Defendant Mecklenburg County is a person within the meaning of 42 U.S.C. Section 2000e(a), and an employer within the meaning of 42 U.S.C. Section 2000e(b).
5. Defendant Mecklenburg County has discriminated against Ruth Annette Harris, a female formerly employed as a temporary social worker assistant in the Division of Youth and Family Services of the County's Department of Social Services, and other women employed and/or formerly employed in the Division of Youth and Family Services, because of their sex in violation of Section 703(a) of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. Section 2000e-2(a), among other ways, by:
  - a. subjecting Ms. Harris and other women employed and/or formerly employed in the Division of Youth and Family Services to sexual harassment; and
  - b. failing or refusing to take appropriate action to remedy the effects of the discriminatory treatment.
6. The Equal Employment Opportunity Commission ("EEOC") received a timely charge filed by Ms. Harris (Charge No. 140-97-0977) in which she alleged that she had been discriminated against in

employment on the basis of sex by being sexually harassed while employed in Mecklenburg County's Division of Youth and Family Services. Ms. Harris further alleged she had reason to believe that the same supervisor of the Defendant who had sexually harassed her had sexually harassed other females.

7. Pursuant to Section 706 of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. Section 2000e-5, the EEOC investigated the charge, found reasonable cause to believe that Ms. Harris's allegations of sexual harassment were true, unsuccessfully attempted to achieve through conciliation a voluntary resolution of these matters, and subsequently referred the charge 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 this Court grant the following relief:

(a) Enjoin the Defendant Mecklenburg County and its directors, officers, agents, employees, successors, and all persons in active concert or participation with the Defendant, as appropriate, from failing or refusing to:

(i) distribute its anti-sexual harassment policy to all persons employed on either a temporary or permanent basis by the County;

(ii) revise its anti-sexual harassment policy to make clear that all persons employed by the County, whether on a permanent or temporary basis, may file a complaint with the County if they experience sexual harassment in the workplace; and

(iii) take other appropriate nondiscriminatory measures to overcome the effects of the discrimination.

(b) Award compensatory damages to Ruth Annette Harris and other women employed and/or formerly employed in the Division of Youth and Family Services who have incurred mental and/or physical injuries as a result of the discrimination against them alleged in this complaint as would fully compensate them for such injuries, pursuant to and within the statutory limitations of Section 102 of the Civil Rights Act of 1991, 42 U.S.C. Section 1981a.

The plaintiff 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. Section 1981a.

JANET RENO  
Attorney General

By: \_\_\_\_\_

BILL LANN LEE  
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