

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

LANGSTON UNIVERSITY, ex rel., THE  
BOARD OF REGENTS FOR THE  
OKLAHOMA STATE UNIVERSITY  
AND AGRICULTURAL AND  
MECHANICAL COLLEGES, a state  
agency,

Defendant.

Civil Action No. \_\_\_\_\_

**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.* ("Title VII").
2. This Court has jurisdiction of the action under 42 U.S.C. § 2000e-5(f) and 28 U.S.C. § 1345.
3. Defendant Langston University, ex rel., the Board of Regents for the Oklahoma Agricultural and Mechanical Colleges ("Defendant") is a governmental agency created pursuant to the laws of the State of Oklahoma.
4. Defendant 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 has subjected Barbara Craig, Ph.D., a Professor employed by the Defendant, to discrimination on the basis of her race, white, in violation of Section 703(a) of

Title VII, 42 U.S.C. § 2000e-2(a), among other ways, by:

(a) Paying her lower wages than it has paid to similarly situated African and African-American employees; and,

(b) Failing or refusing to take appropriate action to remedy the effects of the discriminatory treatment of Dr. Barbara Craig.

6. The United States Equal Employment Opportunity Commission (“EEOC”) received a timely charge (Charge No. 310 2004 03285) filed by Dr. Barbara Craig in April 2004 alleging, *inter alia*, that management officials of Langston University discriminated against her on the basis of race by paying her below scale for her position and by giving preferential treatment in decisions of salary and salary increases to African-American and African employees. Pursuant to Section 706 of Title VII, 42 U.S.C. § 2000e-5, the EEOC investigated the charge, found reasonable cause to believe that Dr. Barbara Craig’s allegation of disparate pay was true, attempted unsuccessfully to achieve through conciliation a voluntary resolution of the charge, and subsequently referred the matter to the United States Department of Justice.

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

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

(a) Enjoin Defendant from subjecting individuals to discriminatory salary decisions based on race, including but not limited to: (1) requiring Defendant to modify its compensation practices and procedures to prevent future discrimination; and (2) requiring Defendant to provide training to its officials and employees involved in determining faculty salaries at Langston University.

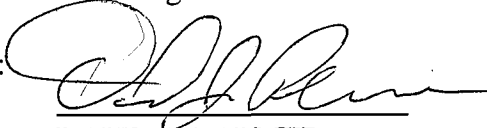
(b) Award sufficient remedial relief to make charging party Barbara Craig whole for the loss she has suffered as a result of the discrimination alleged in this Complaint; and

(c) Award compensatory damages to charging party Dr. Barbara Craig to fully compensate her for the injuries caused by 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

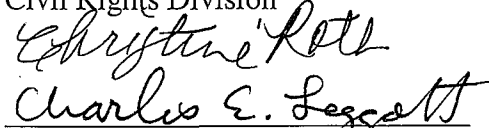
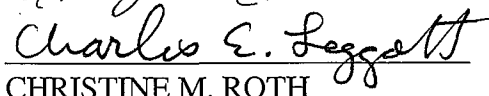
(d) Award such additional relief as justice may require, together with Plaintiff's costs and disbursements in this action.

WAN J. KIM  
Assistant Attorney General  
Civil Rights Division

By:



DAVID J. PALMER  
Chief, Employment Litigation Section  
Civil Rights Division

CHRISTINE M. ROTH  
CHARLES E. LEGGOTT  
United States Department of Justice  
Civil Rights Division  
Employment Litigation Section, PHB  
950 Constitution Avenue, N.W.  
Washington, D.C. 20530  
(202) 514-0548  
(202) 514-1005 (fax)