

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

WEIMAR INDEPENDENT SCHOOL  
DISTRICT,

Defendant.

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

**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. § 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, the Weimar Independent School District (“Weimar ISD”), is a corporate, governmental body created pursuant to the laws of the state of Texas.
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 Jill K. Steward-Trier to discrimination on the basis of her race, in violation of Section 703(a) of Title VII, 42 U.S.C. § 2000e-2(a), among other ways, by:
  - (a) Failing or refusing to hire Ms. Steward-Trier for the position of high school principal; and

(b) Failing or refusing to take appropriate action to remedy the effects of the discriminatory treatment of Ms. Steward-Trier.

6. The U.S. Equal Employment Opportunity Commission (“EEOC”) received a timely charge (Charge No. 330A203478) filed by Ms. Steward-Trier on September 9, 2002, alleging that she had been discriminated against on the basis of race when she was not selected for the high school principal position at Weimar ISD. Pursuant to Section 706 of Title VII, 42 U.S.C. § 2000e-5, the EEOC investigated the charge, found reasonable cause to believe that Ms. Steward-Trier’s allegations were true, attempted unsuccessfully to achieve through conciliation a voluntary resolution of the charge, and subsequently referred the matter to the U.S. 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 hiring policies and practices based on race, including but not limited to:

(1) requiring Defendant to modify its hiring policies and practices to prevent future discrimination; and

(2) requiring Defendant to provide training to its officials and employees involved in hiring processes;

(b) Enjoin Defendant from failing or refusing to provide sufficient remedial relief to charging party Jill K. Steward-Trier to make her whole for the losses she has suffered as a result of the discrimination against her as alleged in this Complaint;

(c) Award compensatory damages to charging party Jill K. Steward-Trier 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

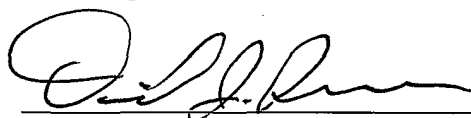
(d) Award such additional relief as justice may require, together with Plaintiff's costs and disbursements in this action.

**JURY DEMAND**

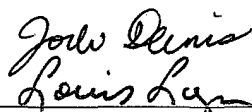
The United States hereby demands a trial by jury of all issues so triable pursuant to Rule 38 of the Federal Rules of Civil Procedure and Section 102 of the Civil Rights Act of 1991, 42 U.S.C. § 1981(a).

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Acting Assistant Attorney General  
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By:



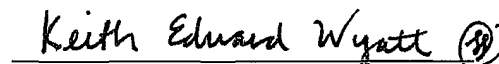
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