

violation of Section 703(a) of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C.

§ 2000e-2(a), among other ways, by:

- (a) rescinding the accrued seniority of Ms. Meziere after she took a leave associated with or arising out of pregnancy;
- (b) releasing Ms. Meziere from her position as a Full-Time Basis Substitute Teacher and demoting her to a position as a Day-to-Day Cadre Substitute Teacher with less pay, fewer benefits, and significantly diminished material responsibilities;
- (c) denying Ms. Meziere a requested leave associated with or arising out of pregnancy; and
- (d) 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 of discrimination against the Board filed by Ms. Meziere (Charge Number 210-2005-03177) on or about March 1, 2005, in which she alleged that she was discriminated against in employment because of her sex, female (pregnancy).

7. Pursuant to 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 of discrimination filed by Ms. Meziere, found reasonable cause to believe that Ms. Meziere was discriminated against on the basis of sex, female (pregnancy), attempted unsuccessfully to achieve through conciliation a voluntary resolution of the charge, and subsequently referred the matter to the U.S. Department of Justice.

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

occurred.

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

- (a) Enjoin the Board from failing and refusing to provide sufficient remedial relief to make whole Traci Meziere for the losses she has suffered as a result of the discrimination against her as alleged in this complaint;
- (b) Enjoin the Board from failing and refusing to take appropriate nondiscriminatory measures to overcome the effects of the discrimination, including developing an effective program to address and prevent pregnancy-based discrimination in the Chicago Public Schools;
- (c) Award compensatory damages to Ms. Meziere as would fully compensate her for the injuries caused by the Board's discriminatory conduct 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;
- (d) Take other appropriate nondiscriminatory measures to overcome the effects of the discrimination; and
- (e) Award such additional relief as justice may require, together with the United States' costs and disbursements in this action.

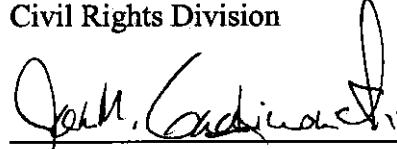
JURY DEMAND

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

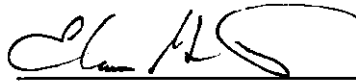
U.S.C. § 1981a.

LORETTA KING
Acting Assistant Attorney General
Civil Rights Division

By:



JOHN M. GADZICHOWSKI
(WI Bar No. 1014294)
Chief



ELAINE GRANT
(DC Bar No. 457163)
Senior Trial Attorney

ESTHER LANDER
(DC Bar No. 461316)
Deputy Chief

U.S. Department of Justice
Civil Rights Division
Employment Litigation Section
950 Pennsylvania Ave., NW, PHB 4910
Washington, DC 20530
Telephone: (202) 305-8686
Fax: (202) 514-1005
Email: Elaine.Grant@usdoj.gov

PATRICK FITZGERALD
United States Attorney
for the Northern District of Illinois

By:

s/ Joan Laser

JOAN LASER
Assistant United States Attorney
Dirksen Federal Building
219 South Dearbone Street, 5th Floor
Chicago, IL 60604

Telephone: (312) 353-1857

Fax: (312) 886-4073

Email: joan.laser@usdoj.gov

Attorneys for Plaintiff United States of America