

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION

**EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION**

JUDGE: JAMES

VS. 06-1351

MAGISTRATE: HAYES

**CENTRAL AMERICAN
LIFE INSURANCE COMPANY**

CORRECTIVE DOCUMENT

INTERVENOR COMPLAINT

The Intervenor Complaint of Rhonda Woodard, major resident and domiciliary of Ouachita Parish, Louisiana, respectfully represents that:

1.

Made defendant herein is:

**CENTRAL AMERICAN LIFE INSURANCE
COMPANY**, a licensed insurance company authorized to do
and doing business in the State of Louisiana with its
registered office at 1401 North Seventh Street, West Monroe,
LA 71291.

2.

This cause arises under Title VII of the Civil Rights Act of 1964 as amended by the Civil Rights Act of 1991. Thus, the court's jurisdiction is based upon a federal question pursuant to 28 U. S.C. §1331.

3.

Intervenor plaintiff was employed by the defendant as a secretary/cashier from July 3, 2002 until November 2004 when she was terminated. At all times pertinent, intervenor plaintiff fully and properly performed all functions of her job.

4.

While employed by defendant, intervenor plaintiff was sexually harassed by coworker Ron Franklin. The harassment included inappropriate sexual remarks, requests for dates and inappropriate touching. Intervenor plaintiff rejected any sexual advances by Ron Franklin and reported the behavior to her immediate supervisor, Donna Pilcher. Ms. Pilcher said she would discuss the matter with her supervisor, Beth Bostwick. Nothing was done by the defendant to correct the behavior of Mr. Franklin. Mr. Franklin had a history of sexual harassment with defendant, but nothing was ever done to discipline Mr. Franklin by defendant.

5.

In October 2004, intervenor plaintiff submitted a written complaint to the Regional Manager Daniel Graffeo giving details of the sexual harassment by Ron Franklin. She received no reply to her written complaint and the sexually harassing behavior of Mr. Franklin continued toward intervenor plaintiff. On October 2, 2004, intervenor plaintiff requested a transfer to another office to get away from Mr. Franklin.

6.

In November 2004, intervenor plaintiff was terminated in retaliation for filing a sexual harassment complaint about Mr. Franklin.

7.

At all times pertinent, defendant employed more than fifteen (15) employees.

8.

On or about November 23, 2004, a Charge of Discrimination was filed with the Equal Employment Opportunity Commission in New Orleans. On August 9, 2006, this cause was filed by the Equal Employment Opportunity Commission and contemporaneously with this Complaint, intervenor plaintiff files a Motion to Intervene.

9.

Because of her dismissal from her position with defendant, intervenor plaintiff has suffered extreme emotional distress, pain and suffering. Intervenor plaintiff has also suffered loss of income as a result of the actions of defendant.

10.

Intervenor plaintiff desires a trial by jury.

WHEREFORE, intervenor plaintiff prays that after due proceedings there be judgment in her favor and against defendant for a sum reasonable in the premises to compensate her for the emotional distress, pain and suffering and loss of income calculated to be the sum of \$250,000.00; punitive damages in the sum of \$100,000.00; all costs of these proceedings; a reasonable attorney's fee; legal interest from date of judicial

demand until paid; reinstatement to a position at whatever Central American Insurance Company location is appropriate and/or comparable to the one from which she was dismissed; and such other relief as the Court deems just and equitable.

S/J. Michael Rhymes
J. Michael Rhymes #11212
Attorney at Law
401 Hudson Lane
Monroe, LA 71201
(318) 388-4500 (telephone)
(318) 361-0209 (facsimile)
Attorney for Rhonda Woodard

CERTIFICATE OF SERVICE

On December 13, 2006 the above and foregoing Intervenor Complaint was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to Harry Moffett, IV, Michelle T. Butler, Jim Sacher and Rudy Sustaita.

S/ J. MICHAEL RHYMES
J. Michael Rhymes #11212