

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v. Civil Action No.

GREENWOOD COMMUNITY SCHOOL CORPORATION,

Defendant.

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 over this action under 42 U.S.C. § 2000e-5(f) and 28 U.S.C. § 1345.
3. Defendant Greenwood Community School Corporation ("Greenwood") is a political subdivision of the State of Indiana, created pursuant to its laws.
4. Defendant Greenwood 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 Greenwood has retaliated against William J. Ronk in violation of § 704(a) of Title VII, 42 U.S.C. § 2000e-3(a), by:
 - Failing or refusing to promote or consider Mr. Ronk for the Director of Guidance position when that position became vacant in or around July 2001 because he filed with the Equal Employment Opportunity Commission ("EEOC") in or around July 2000 a charge (Charge No. 240-A0-2167) alleging that Greenwood denied him because of his sex, male, the Director of Guidance position when the position became vacant at the end of the 1999-2000 school year; and
 - Failing or refusing to take appropriate action to remedy the effects of the discriminatory treatment of Mr. Ronk.
6. The EEOC received a timely charge filed by Mr. Ronk on or around August

22, 2001 (Charge No. 240-A1-2613) in which Mr. Ronk alleged that Greenwood retaliated against him, *inter alia*, by denying him the opportunity to apply for the Director of Guidance position in July 2001 because he filed with the EEOC in July 2000 Charge No. 240-A0-2167 against Greenwood.

7. Pursuant to § 706 of Title VII, 42 U.S.C. § 2000e-5, the EEOC investigated Charge No. 240-A1-2613 and found reasonable cause to believe, *inter alia*, that Mr. Ronk was denied a promotion to the Director of Guidance position when the position became vacant in or around July 2001 in retaliation for having filed a prior EEOC charge. The EEOC attempted unsuccessfully to achieve a voluntary resolution of the charge through conciliation, and subsequently referred the charge to the United States 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. Enter an order enjoining Defendant Greenwood from failing or refusing to provide remedial relief sufficient to make whole the charging party, Mr. Ronk, for the individual loss he has suffered as a result of the discrimination against him as alleged in this Complaint; and

B. Take other appropriate nondiscriminatory measures to overcome the effects of the discrimination.

The Plaintiff prays for such additional relief as justice may require, together with its costs and disbursements in this action.

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