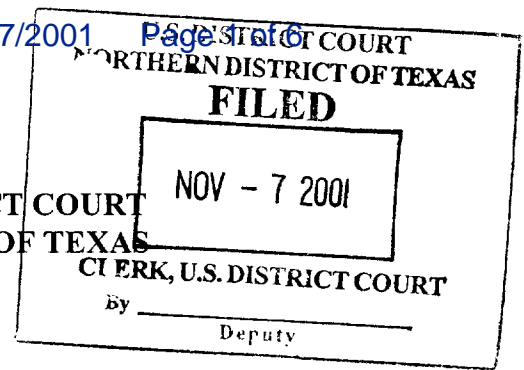


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**ORIGINAL** IN THE UNITED STATES DISTRICT COURT  
 FOR THE NORTHERN DISTRICT OF TEXAS  
 DALLAS DIVISION



**EQUAL EMPLOYMENT OPPORTUNITY  
 COMMISSION,**

**Plaintiff,**

**v.**

**I-SECTOR CORPORATION,**

**Defendant.**

**CIVIL ACTION NO.**

**3-01CV2240-R**  
**COMPLAINT**

**JURY TRIAL DEMANDED**

### **NATURE OF THE ACTION**

This is an action under Title VII of the Civil Rights Act of 1964, as amended, and Title I of the Civil Rights Act of 1991 to correct unlawful employment practices on the basis of sex and to provide appropriate relief to Carrie Harris and aggrieved individual Dana Bartlett who were subjected to a sexually hostile work environment, sex-based discrimination and constructive discharge.

### **JURISDICTION AND VENUE**

1. Jurisdiction of this Court is invoked pursuant to 28 U.S.C. §§ 451, 1331, 1337, 1343, and 1345. This action is authorized and instituted pursuant to Section 706(f)(1) and (3) of the Civil Rights Act of 1964, as amended, ("Title VII"), 42 U.S.C. § 2000e-5(f)(1) and (3), and Section 102 of the Civil Rights Act of 1991, 42 U.S.C. Sec. 1981a.

2. The employment practices alleged to be unlawful were and are now being committed within the jurisdiction of the United States District Court for the Northern District of Texas, Dallas Division.

### **PARTIES**

3. Plaintiff, Equal Employment Opportunity Commission (the "Commission"), is an agency of the United States of America charged with the administration, interpretation and enforcement of Title VII of the Civil Rights Act of 1964, as amended and is expressly authorized to bring this action by Section 706(a) of Title VII, 42 U.S.C. § 2000e-5(a).

4. At all relevant times, Defendant, I-Sector Corporation, has continuously been and is now doing business in the State of Texas and has continuously had at least fifteen employees.

5. At all relevant times, Defendant, I-Sector Corporation, has continuously been an employer engaged in an industry affecting commerce under Section 701(b), (g) and (h) of Title VII, 42 U.S.C. §2000e-(b), (g) and (h).

### **STATEMENT OF CLAIMS**

6. More than thirty days prior to the institution of this lawsuit, Carrie Harris filed charges with the Commission alleging violations of Title VII of the Civil Rights Act of 1964, as amended, by the Defendant, I-Sector Corporation. All conditions precedent to the institution of this lawsuit have been fulfilled.

7. During the employment of Carrie Harris and Dana Bartlett, the Defendant has engaged in unlawful employment practices in violation of Section 703(a)(1) of Title VII, 42 U.S.C. § 2000e-2(a)(1) by subjecting Harris and Bartlett to a sexually hostile work environment, discriminating against them on account of their sex, and constructively discharging them. Specifically, I-Sector Corporation subjected Harris and Bartlett to a sexually hostile work atmosphere in that they were constantly and repeatedly subjected to sexually explicit remarks, sexually explicit photographs and videos and pornographic magazines, resulting in their constructive discharge from the position.

8. The result of the foregoing practices has been to deprive Carrie Harris and the aggrieved individual of equal employment opportunities because of their sex.

9. The unlawful employment practices complained of in paragraph 7 above were intentional.

10. The unlawful employment practices complained of in paragraph 7 above were done with malice or with reckless indifference to the federally protected rights of Carrie Harris and the aggrieved individual.

**PRAYER FOR RELIEF**

Wherefore, the Commission respectfully requests that this Court:

A. Grant a permanent injunction enjoining the Defendant, I-Sector Corporation, its officers, successors, assigns, and all persons in active concert or participation with it, from engaging in any employment practice which discriminates on the basis of sex, or which facilitates, condones or encourages sexual harassment.

B. Order the Defendant to institute and carry out policies, practices, and programs which provide equal employment opportunities and a non-hostile work environment for all employees, including males, and which eradicate the effects of its past and present unlawful employment practices.

C. Order the Defendant to make whole Carrie Harris and the aggrieved individuals by providing appropriate back pay with prejudgment interest in amounts to be determined at trial, pecuniary losses, compensatory damages including out-of-pocket expenses, and other affirmative relief necessary to eradicate the effects of its unlawful employment practices.

D. Order the Defendant to make Carrie Harris and the aggrieved individual whole by

providing compensation for past and future pecuniary losses resulting from the unlawful employment practices described in paragraph 7 above, including but not limited to out of pocket job hunting expenses.

E. Order the Defendant to make Carrie Harris and the aggrieved individual whole by providing compensation for past and future nonpecuniary losses resulting from the unlawful employment practices described in paragraph 7 above, including but not limited to, pain and suffering, humiliation, embarrassment, emotional distress, anxiety, and loss of enjoyment of life, in amounts to be determined at trial.

F. Order the Defendant to pay Carrie Harris and the aggrieved individual punitive or exemplary damages for its intentional, malicious conduct or reckless indifference described and referenced in paragraph 7 above, in an amount to be determined at trial.

G. Grant such further relief as the Court deems necessary and proper in the public interest.

H. Award the Commission its costs in this action.

**JURY TRIAL DEMAND**

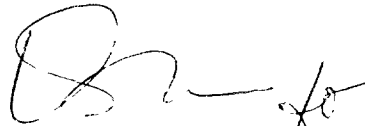
The Commission requests a jury trial on all questions of fact raised by its Complaint.

Respectfully submitted,

NICHOLAS M. INZEO  
Acting Deputy General Counsel

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TOBY W. COSTAS  
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EQUAL EMPLOYMENT OPPORTUNITY  
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**CERTIFICATE OF SERVICE**

I certify that a true copy of the foregoing has been served on all counsel of record for the Defendant at the address below via United States first class mail, postage prepaid, on this the 7 day of Nov, 2001.

Mario A. Barrera  
BRACEWELL &PATTERSON, L.L.P.  
800 One Alamo Center  
106 S. St. Mary's Street  
San Antonio, Texas 78205-3603

A handwritten signature in black ink, appearing to read 'Keri L. Mallon', written over a horizontal line.

Keri L. Mallon