

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI**

		)	
UNITED STATES OF AMERICA,		)	
		)	
	Plaintiff,	)	Civil Action No. 2:25-cv-126-TBM-RPM
v.		)	
		)	
		)	JURY DEMAND
CITY OF HATTIESBURG, MISSISSIPPI,		)	
		)	
	Defendant.	)	
		)	

COMPLAINT

Plaintiff, the United States of America (United States), respectfully alleges:

1. The United States brings this action against Defendant City of Hattiesburg, Mississippi (City), to enforce Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e, *et seq.* (Title VII). The City retaliated against Hope Chatman (Chatman), in violation of Title VII, when it terminated her because she opposed sexual harassment.

JURISDICTION AND VENUE

2. This Court has jurisdiction over this action under 42 U.S.C. § 2000e-5(f) and 28 U.S.C. §§ 1331 and 1345.

3. Venue is proper in this judicial district under 42 U.S.C. § 2000e-5(f)(3) and 28 U.S.C. § 1391(b) because it is where a substantial part of the events or omissions giving rise to this action occurred.

PARTIES

4. Plaintiff is expressly authorized to bring this action by Sections 706(f)(1) and (3) of Title VII, 42 U.S.C. §§ 2000e-5(f)(1) and (3).

5. Defendant City of Hattiesburg is a governmental body established by the laws of Mississippi and is located within this judicial district.

6. 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).

7. Hope Chatman filed a timely charge with the United States Equal Employment Opportunity Commission (EEOC) (Charge No. 423-2021-00850) on or about June 7, 2021, alleging the City discriminated against her in employment based on her sex, by subjecting her to sexual harassment, and retaliated against her for opposing that sexual harassment. Pursuant to Section 706 of Title VII, 42 U.S.C. § 2000e-5, the EEOC investigated the charge and found reasonable cause to believe the City discriminated against Chatman based on her sex and retaliated against her for her opposition to sexual harassment. The EEOC attempted unsuccessfully to conciliate this matter and subsequently referred the charge to the Department of Justice.

8. All conditions precedent to this lawsuit have been performed or have occurred.

FACTUAL ALLEGATIONS

9. Chatman worked in the City’s Water & Sewer Department for about three-and-a-half years and came under the supervision of Anthony Keyes (Keyes) in or around August 2020, while she worked as a Relief Operator.

10. Chatman and Keyes spent significant amounts of time together alone driving around in a truck collecting and testing water samples.

11. While Chatman was alone with Keyes, he engaged in offensive unwelcome sex-based conduct including, but not limited to, talking in graphic detail about his sex life, watching

pornography, and looking at Chatman's crotch. Chatman asked Keyes to stop these behaviors and said she had no interest in having sex with him.

12. Chatman also heard false and offensive rumors in the workplace that she and Keyes had sex. One such rumor was that Keyes offered Chatman \$800 to have sex with him. Based on what she heard, she believed Keyes started and/or spread these rumors.

13. Because of Keyes' offensive conduct, Chatman went to Keyes' home and spoke to his wife about his behavior. Chatman told Keyes' wife he had been looking at her crotch and making sexual advances toward her, and that his behavior made her uncomfortable. Chatman hoped Keyes' wife could persuade him to stop engaging in this offensive conduct.

14. According to Chatman, Keyes' wife said he had engaged in similar conduct toward other women in the past.

15. Keyes spoke with Chatman after Chatman's conversation with his wife. Chatman told him, among other things, that she was offended by the false rumors going around about them having sex.

16. Keyes reported Chatman's complaint about these rumors to his supervisor, Deputy Director Steven Bullock (Bullock).

17. On or about January 21, 2021, Bullock approached Chatman and said he wanted to talk with her because he had heard something was going on between her and Keyes. Chatman told Bullock about Keyes' offensive behavior, including that he made sexual advances toward her and spread lies about them having sex, and she told Bullock she had spoken with Keyes' wife about his conduct.

18. Chatman asked Bullock if he would separate her and Keyes, so they did not have to work together, because Keyes' offensive conduct made her uncomfortable. Bullock agreed to

this request and assigned Chatman to tasks other than driving around with Keyes testing water samples.

19. After his conversation with Chatman about Keyes' offensive conduct, Bullock told his supervisor, Director Alan Howe (Howe), about Chatman's complaints against Keyes. Howe told Bullock he would speak with Keyes about the complaint.

20. On or about March 17, 2021, Chatman contacted Howe, in large part, because she wanted a more permanent assignment that would separate her and Keyes. Howe was unable to speak with Chatman until the next day.

21. On or about March 18, 2021, Chatman spoke with Howe and said Keyes had made her uncomfortable by making sexual advances toward her. Howe ended the conversation with Chatman before she finished speaking with him but he said they would continue their conversation later.

22. Howe believed Chatman lied when she accused Keyes of making sexual advances toward her and engaging in other offensive conduct.

23. Howe told Bullock he did not believe Chatman's accusations against Keyes because Keyes was not the "type" of person who would engage in such offensive conduct.

24. On or about March 19, 2021, Howe told Chatman she needed to speak with City Clerk Kermas Eaton (Eaton) and Human Resource Specialist Brenda Trotter (Trotter) that day regarding her harassment complaints against Keyes. As directed, Chatman met with Eaton that day and gave him handwritten notes which described some of Keyes' offensive conduct, the false rumors going around about them having sex, and conversations Chatman had with people about Keyes' conduct and the rumors.

25. In March 2021, following Chatman's meeting with Eaton on or about March 19, 2021, Eaton and Trotter investigated Chatman's complaint by interviewing Bullock, Keyes, and one of the employees Chatman identified in the notes she provided to them.

26. Chatman's handwritten notes she gave to Eaton identified a number of individuals with information relevant to the investigation of her complaint. Chatman also identified individuals with relevant information when she spoke with Eaton about her complaint. Not all of these individuals were interviewed during the investigation of Chatman's complaint.

27. At the conclusion of the investigation, Eaton determined that Chatman and Keyes should no longer work in close proximity with each other.

28. Eaton spoke with Howe about the decision to keep Chatman and Keyes separate, and Howe told Eaton he would comply with the decision.

29. Eaton also told Chatman and Keyes they should no longer work in close proximity with one another.

30. In April 2021, despite the decision to keep Chatman and Keyes apart, Howe directed Chatman to sit in a room with Keyes and others for a training session.

31. Chatman told Howe she was not comfortable sitting in the same room as Keyes because of his offensive sex-based conduct toward her. Howe did not relent and told Chatman that, despite her discomfort, she had to sit in the room with Keyes for the training.

32. The training session took place on or about April 28, 2021. Chatman attended the training by sitting in the doorway to the room.

33. During the training, Howe saw Chatman in the doorway to the training room, and he told her he wanted her to go further into the room. Chatman refused to go further into the room because of Keyes' presence in the room.

34. On May 5, 2021, Howe informed Chatman he decided to terminate her employment.

35. Howe completed a disciplinary form to document the termination decision which falsely said Chatman did not attend the April 28, 2021, training.

36. Howe further stated on the disciplinary form that he told Chatman to attend the April 28, 2021, training and her failure to attend constituted insubordination.

37. The City's Employee Discipline Policy includes a progressive disciplinary procedure with escalating levels of discipline from verbal reprimand, to written reprimand, to suspension, and finally termination. Under this policy, "[n]ormally, the disciplinary procedure to be followed is progressive in nature" and terminations are appropriate only in the absence of previous discipline when "infractions or acts of misconduct are repeated or where a single infraction or misconduct is severe."

38. Before her termination, Chatman had never received any employee discipline from the City.

39. In terminating Chatman, the City did not follow its progressive discipline policy.

40. The City treated employees similarly situated to Chatman who engaged in misconduct similar to or worse than Chatman's alleged misconduct—but who did not oppose sexual harassment like Chatman—more leniently than Chatman.

41. For example, in January 2023, Howe found it appropriate to merely suspend an employee who committed an act of insubordination when the employee refused to come into work to help fix a water main break. This employee, unlike Chatman, had never complained about sexual harassment.

42. After Howe terminated Chatman's employment, she filed a complaint with the City about the termination which alleged she was targeted because of her complaints about sexual harassment. The City did not investigate this complaint.

43. As a direct and proximate result of the City's termination of Chatman, she has suffered damages including, but not limited to, lost wages, lost benefits, and loss of enjoyment of life.

CLAIM FOR RELIEF

Title VII, 42 U.S.C. § 2000e-3(a)

Retaliation

44. The United States repeats and incorporates by reference the factual allegations set forth in paragraphs 9 through 43 above.

45. Chatman's refusal to go further into the training room during the April 28, 2021, training because she was uncomfortable being near Keyes constituted protected activity under 42 U.S.C. § 2000e-3(a).

46. Chatman engaged in protected activity under 42 U.S.C. § 2000e-3(a) when she complained about Keyes' sexual harassment.

47. The City terminated Chatman because of these protected activities in violation of 42 U.S.C. § 2000e-3(a).

PRAYER FOR RELIEF

WHEREFORE, the United States prays this Court grant the following relief:

- A. Order Defendant to implement policies, practices, and procedures to prevent and remedy retaliation that violates Title VII;
- B. Provide equitable relief to Chatman, including backpay and lost benefits, to compensate her for the loss she has suffered as a result of Defendant's retaliatory conduct alleged in

this Complaint;

- C. Award damages to Chatman to fully compensate her for damages caused by Defendant's retaliatory conduct 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. Award Chatman any prejudgment interest determined to be due;
- E. Award such additional relief as justice may require, together with the United States' costs and disbursements in this matter.

JURY DEMAND

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

Date: September 3, 2025

Respectfully submitted,

HARMEET K. DHILLON
Assistant Attorney General
Civil Rights Division

ERIC SELL
Counsel
Civil Rights Division

JEFFREY MORRISON
Acting Chief
Employment Litigation Section

BY: /s/ Ramya Sekaran

HILARY PINION
(VA Bar No. 46872)
Acting Principal Deputy Chief

RAMYA SEKARAN
(DC Bar No. 1615796)

Trial Attorney
Lead Counsel

JILLIAN MOO-YOUNG
(DC Bar No. 1045088)
Trial Attorney

U.S. Department of Justice
Civil Rights Division
Employment Litigation Section
150 M Street, NE
Washington, DC 20002
Telephone: (202) 353-5035
Facsimile: (202) 514-1005
Hilary.Pinion@usdoj.gov
Ramya.Sekaran2@usdoj.gov
Jillian.Moo-Young@usdoj.gov

PATRICK A. LEMON
Acting United States Attorney
Southern District of Mississippi

BY: /s/ Gregg Mayer
GREGG MAYER
(MS Bar No. 102232)
Assistant United States Attorney
United States Attorney's Office
Southern District of Mississippi
501 East Court Street, Suite 4.430
Jackson, Mississippi 39201
Telephone: (601) 965-4480
Facsimile: (601) 965-4032
Email: gregg.mayer@usdoj.gov

MAX L. MEYERS
(MS Bar No. 106187)
Assistant United States Attorney
United States Attorney's Office
Southern District of Mississippi
501 East Court Street, Suite 4.430
Jackson, Mississippi 39201
Telephone: (601) 973-2172
Facsimile: (601) 965-4032
Email: Max.Meyers2@usdoj.gov

Attorneys for Plaintiff United States of America