

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
GALVESTON DIVISION

EQUAL EMPLOYMENT	§	
OPPORTUNITY COMMISSION,	§	Civil Action No. 3:26-cv-00206
	§	
Plaintiff	§	
	§	
v.	§	
	§	ORIGINAL COMPLAINT
THE UNIVERSITY OF TEXAS	§	
MEDICAL BRANCH,	§	
	§	
Defendant	§	JURY TRIAL DEMANDED

NATURE OF THE ACTION

This is an action under the Equal Pay Act of 1963 to restrain the unlawful payment of wages to an employee of one sex at a rate less than the rate paid to an employee of the opposite sex, and to collect back wages due to the employee, who was adversely affected as a result of such unlawful payments. As is alleged with greater particularity below, Defendant, The University of Texas Medical Branch, violated the Equal Pay Act by paying a female Solutions Architect lower wages than a male Solutions Architect for performing substantially equal work based on her sex.

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 16(c) and 17 of the Fair Labor Standards Act of 1938 (the “FLSA”), as amended, 29 U.S.C. §§ 216(c) and 217, to enforce the requirements of the Equal Pay Act of 1963 (“EPA”), as codified as Section 6(d) of the FLSA, 29 U.S.C. § 206(d).

2. The employment practices alleged to be unlawful were committed within the jurisdiction of the United States District Court for the Southern District of Texas, Galveston Division.

### PARTIES

3. Plaintiff, the Equal Employment Opportunity Commission (the “Commission”), is the agency of the United States of America charged with the administration, interpretation and enforcement of, *inter alia*, the Equal Pay Act, and is expressly authorized to bring this action by Sections 16(c) and 17 of the FLSA, 29 U.S.C. §§ 216(c) and 217, as amended by Section 1 of Reorganization Plan No. 1 of 1978, 92 Stat. 3781, and Public Law 98-532 (1984), 98 Stat. 2705.

4. Defendant, The University of Texas Medical Branch (“Defendant” or “UTMB”), is a public academic health science center in Galveston, Texas, is part of the University of Texas System and a member of the Texas Medical Center, and has the primary missions of health sciences education, medical research, and health care services.

5. At all relevant times, Defendant has acted directly or indirectly as an employer in relation to employees and has continuously been an employer within the meaning of Section 3(d) of the FLSA, 29 U.S.C. § 203(d).

6. At all relevant times, Defendant has continuously been a public agency within the meaning of Section 3(x) of the FLSA, 29 U.S.C. § 203(x).

7. At all relevant times, Defendant has continuously employed employees engaged in commerce or in the production of goods for commerce within the meaning of Sections 3(b), (i) and (j) of the FLSA, 29 U.S.C. §§ 203(b), (i), and (j), and has continuously been an enterprise engaged in commerce or in the production of goods for commerce within the meaning of Sections

3(r) and (s) of the FLSA, 29 U.S.C. §§ 203(r) and (s), in that said enterprise has continuously been an enterprise that has employees engaged in an activity of a public agency.

8. Defendant may be served with process of service by serving Dr. Jochen Reiser in his capacity as President of UTMB, 301 University Blvd., Galveston, Texas 75555.

STATEMENT OF EQUAL PAY ACT CLAIMS

9. Since at least October 2023, Defendant has violated Sections 6(d)(1) and 15(a)(2) of the FLSA, 29 U.S.C. §§ 206(d)(1) and 215(a)(2), by paying lower wages to Maria Alza (“Alza”), a Solutions Architect, than it paid to a male Solutions Architect, Henry Dominguez (“Dominguez”) for equal work in a job requiring substantially equal skill, effort, and responsibility and performed under similar working conditions. Defendant’s unlawful acts include, but are not limited to, the following facts:

- a. Both Alza and Dominguez were employed in the position of Solutions Architect for UTMB during the relevant time period of October 2023 through January 30, 2026, when the position was eliminated.
- b. Alza and Dominguez worked as Solutions Architects in UTMB’s Data and Analytics Technical Administration Department and were responsible for providing consultancy within the organization by investigating, identifying, innovating, and implementing appropriate solutions for highly complex software and programming applications in support of clinical, academic, research, and business users.
- c. The written job description for the Solutions Architect position indicates that the job required a bachelor’s degree in computer science/information systems or a related field, and five years of related experience in analytic reporting, “preferably in a large, complex healthcare environment” such as UTMB. Although a master’s

degree was not required, preferred qualifications included a master's degree (MS) in Computer Science or Computer Science/Information Systems, and experience in certain computer programs.

- d. At the time she was promoted to Solutions Architect, Alza had over six years of relevant work experience with UTMB, having been hired and then promoted to no less than four computer science-related jobs at UTMB before being chosen as a Solutions Architect. She also held a bachelor's degree in computer information systems and four information technology (IT)-related certifications.
- e. When Alza was promoted to the Solutions Architect position in October 2023, her salary was set at \$110,000, plus a 2.5% merit increase (representing the scheduled raise for her previous position), for a total of \$112,750.
- f. In October 2023, UTMB hired Dominguez to be a Solutions Architect, and his salary was set at \$125,000.00.
- g. At the time he was hired, Dominguez had not previously worked for UTMB or in any other large, complex healthcare environment or the healthcare industry at all. He lacked any degree relating to technology, computer sciences, or computer systems, and his experience was primarily in education and teaching.
- h. In December 2023, approximately two months after beginning work as a Solutions Architect, Alza obtained a Master of Science degree in Business Analytics (a computer science degree that combines data analytics with business experience).
- i. Both Alza and Dominguez received merit increases in December 2023, but the disparity in wages between the two persisted.

- j. In May 2024, Alza raised concerns to her immediate supervisor about her salary and the fact that she was not receiving equal pay to that of her co-worker, Dominguez. The supervisor requested UTMB's Human Resources Department to conduct a compensation review to determine whether Alza's salary should be adjusted.
  - k. UTMB awarded Alza no increase in her salary following its compensation review.
10. The job performed by both Alza and Dominguez was governed by the same job description and the following facts applied to the performance of the job by both:
- a. The performance of the Solutions Architect job required equal skill, effort, and responsibility and the same general knowledge bases, for both Alza and Dominguez.
  - b. Alza and Dominguez performed the same work, their duties did not differ in any meaningful way, and they both performed the job under the same or similar working conditions in the same office.
  - c. Alza equaled or exceeded Dominguez in every aspect of relevant knowledge and performance of the Solutions Architect job.
  - d. Yet Dominguez received higher pay than Alza.
11. As a result of the acts complained of above, Defendant has unlawfully withheld and is continuing to withhold the payment of wages due to Alza.
12. The unlawful employment practices complained of in paragraph 9 above were willful within the meaning of the EPA and 29 CFR § 1620.33.

PRAYER FOR RELIEF

Wherefore, the Commission respectfully requests that this Court:

A. Grant a permanent injunction enjoining Defendant, its officers, agents, servants, employees, attorneys, and all persons in active concert or participation with them, from discriminating against females with respect to their compensation and from paying female employees lower compensation than employees of the opposite sex in the same establishment for performing equal work on a job, the performance of which requires substantially equal skill, effort and responsibility, and which are performed under similar working conditions.

B. Order Defendant to institute and carry out policies, practices, and programs and revisions to same, that provide equal employment opportunities, including equal pay, for females and eradicate the effects of its past and present unlawful employment practices.

C. Grant a judgment requiring Defendant to make whole Ms. Alza by paying appropriate back pay in amounts to be determined at trial, an equal sum as liquidated damages, and prejudgment interest to Ms. Alza, whose wages were unlawfully withheld as a result of the acts complained of above and to provide other affirmative relief necessary to eradicate the effects of its unlawful employment practices.

D. Grant an award of post-judgment interest to be paid to Ms. Alza.

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

F. Award the Commission its costs of this action.

JURY TRIAL DEMAND

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

Respectfully submitted,

**EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION**

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**COUNSEL FOR PLAINTIFF  
EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION**

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Equal Employment Opportunity Commission

(b) County of Residence of First Listed Plaintiff (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Claudia Molina Antanaitis, EEOC
1919 Smith Street, 7th Floor, Houston, TX 77002

DEFENDANTS

The University of Texas Medical Branch

County of Residence of First Listed Defendant (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff
2 U.S. Government Defendant
3 Federal Question (U.S. Government Not a Party)
4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State PTF DEF 1 1
Citizen of Another State 2 2
Citizen or Subject of a Foreign Country 3 3
Incorporated or Principal Place of Business In This State 4 4
Incorporated and Principal Place of Business In Another State 5 5
Foreign Nation 6 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

Table with 5 columns: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES. Includes various legal categories like Personal Injury, Real Property, Labor, etc.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding
2 Removed from State Court
3 Remanded from Appellate Court
4 Reinstated or Reopened
5 Transferred from Another District (specify)
6 Multidistrict Litigation - Transfer
8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): Equal Pay Act of 1963, as amended

Brief description of cause:

Defendant paid lower wages to a female Solutions Architect than it paid her male counterpart who performed substantially equal work.

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ CHECK YES only if demanded in complaint: JURY DEMAND: [X] Yes [ ] No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE DOCKET NUMBER

DATE SIGNATURE OF ATTORNEY OF RECORD

Jun 26, 2026 /s/ Claudia Moina-Antanaitis

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

**INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44**

## Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.  
 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here. United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.  
 Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.  
 Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.  
 Original Proceedings. (1) Cases which originate in the United States district courts.  
 Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.  
 Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.  
 Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.  
 Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.  
 Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.  
 Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.  
**PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.  
 Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.  
 Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related cases, if any. If there are related cases, insert the docket numbers and the corresponding judge names for such cases.

**Date and Attorney Signature.** Date and sign the civil cover sheet.