

2. The employment practices alleged to be unlawful were committed within the jurisdiction of the United States District Court for the Middle District of North Carolina.

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 Title VII of the Civil Rights Act and 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).

4. At all relevant times, Defendant Henredon Furniture Industries, Inc. has continuously been a Delaware corporation doing business in the State of North Carolina and the City of High Point and has continuously had at least fifteen employees.

5. At all relevant times, Defendant Henredon Furniture Industries, Inc. has continuously been an employer engaged in an industry affecting commerce under Sections 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, Rickie Wilson, Freddie Ragin and Lester Little filed charges with the Commission alleging violations of Title VII by Defendant. All conditions precedent to the institution of this lawsuit have been fulfilled.

7. Since at least 1997 until January 2006, Defendant has engaged in unlawful employment practices at its facility located in High Point, North Carolina, in violation of Section 703(a)(1) of Title VII, 42 U.S.C. § 2000e-2(a)(1). Specifically, Defendant subjected Rickie Wilson, Freddie Ragin, Lester Little and other similarly situated African American employees to discrimination based on their race by subjecting them to racial harassment that created a racially

hostile work environment. The racial harassment included unwelcome racial slurs, jokes and comments by numerous employees, including supervisors. Although Defendant received complaints about the racially hostile work environment from some of the aggrieved individuals and otherwise knew or reasonably should have known about the racial harassment, Defendant failed to take reasonable steps to prevent or correct the racial harassment. The racial harassment therefore continued.

8. The effect of the practices complained of in paragraph 7 above has been to deprive Rickie Wilson, Freddie Ragin, Lester Little and other similarly situated African American employees of equal employment opportunities and otherwise adversely affect their status as employees because of their race.

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 Rickie Wilson, Freddie Ragin, Lester Little and other similarly situated African American employees.

PRAYER FOR RELIEF

Wherefore, the Commission respectfully requests that this Court:

A. Grant a permanent injunction enjoining Defendant, its officers, successors, assigns, and all persons in active concert or participation with it, from racial harassment or any other employment practice that discriminates on the basis of race.

B. Order Defendant to institute and carry out policies, practices, and programs that provide equal employment opportunities for African American employees and which eradicate the effects of its past and present unlawful employment practices.

C. Order Defendant to make whole Rickie Wilson, Freddie Ragin, Lester Little and other similarly situated African American employees by providing compensation for past and future pecuniary losses resulting from the unlawful practices complained of in paragraph 7 above in amounts to be determined at trial.

D. Order Defendant to make whole Rickie Wilson, Freddie Ragin, Lester Little and other similarly situated African American employees by providing compensation for past and future non-pecuniary losses resulting from the unlawful practices complained of in paragraph 7 above, including but not limited to emotional pain, suffering, inconvenience, loss of enjoyment of life, humiliation, and loss of civil rights in amounts to be determined at trial.

E. Order Defendant to pay Rickie Wilson, Freddie Ragin, Lester Little and other similarly situated African American employees punitive damages for its malicious and reckless conduct, as described above, in amounts to be determined at trial.

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

G. 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.

DATED this 6th day of September, 2006.

Respectfully submitted,

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