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9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 EQUAL EMPLOYMENT
12 OPPORTUNITY COMMISSION,

13 Plaintiff,

14 v.

15 CAESARS ENTERTAINMENT,
16 INC., d/b/a RENO HILTON, PARK
17 PLACE ENTERTAINMENT
18 CORPORATION, d/b/a RENO
19 HILTON and DOES 1 - 10, inclusive,

20 Defendants.

CASE NO.:

**COMPLAINT- CIVIL RIGHTS
EMPLOYMENT
DISCRIMINATION**
(42 U.S.C. §§ 2000e, *et seq.*)

JURY TRIAL DEMAND

CV-N-04-0276-DWH-VPC

21 NATURE OF THE ACTION

22 This is an action under Title VII of the Civil Rights Act of 1964, as
23 amended, and Title I of the Civil Rights Act of 1991 to correct unlawful
24 employment practices. Plaintiff United States Equal Employment Opportunity
25 Commission ("Commission" or "EEOC") alleges that Defendants Caesars
26 Entertainment, Inc., d/b/a Reno Hilton, Park Place Entertainment Corporation,
27 d/b/a Reno Hilton and Doe Defendants 1-10 (all named and unnamed Defendants
28 are collectively referred to as "Defendants") subjected Charging Party Rosa

1 Gonzalez de Moreno (“Ms. Gonzalez de **Moreno**”) and a class of other similarly
2 situated female employees (“class members”) to sex harassment. The
3 Commission further alleges that Defendant **retaliated** against Ms. Gonzalez de
4 Moreno for complaining about the sex harassment.

5 JURISDICTION AND VENUE

6 1. Jurisdiction of this Court is invoked pursuant to 28 U.S.C. §§ 451,
7 1331, 1337, 1343 and 1345.

8 2. This action is authorized and instituted pursuant to Section 706(f)(1)
9 and (3) of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §
10 2000e-5(f)(1) and (3) ("Title VII") and Section 102 of the Civil Rights Act of
11 1991, 42 U.S.C. § 1981a.

12 3. The employment practices **alleged** to be unlawful were and are now
13 being committed within the jurisdiction of the United States District Court for the
14 District of Nevada.

15 PARTIES

16 4. Plaintiff, U.S. Equal Employment Opportunity Commission, is the
17 federal agency charged with the administration, interpretation and enforcement of
18 Title VII, and is expressly authorized to bring this action by Section 706(f)(1) and
19 (3) of Title VII, 42 U.S.C. § 2000e-5(f)(1) and (3).

20 5. At all relevant times, Defendant **Caesars Entertainment, Inc.**, d/b/a
21 Reno Hilton has continuously been doing business in the State of Nevada, and in
22 Washoe County. At all relevant times, **Defendants** have continuously employed
23 fifteen (15) or more persons.

24 6. At all relevant times, Defendant **Park Place Entertainment**
25 Corporation, d/b/a Reno Hilton has continuously been doing business in the State
26 of Nevada, and in Washoe County. At all relevant times, **Defendants** have
27 continuously employed fifteen (15) or more persons.

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1 issued a Letter of Determination finding that Ms. Gonzalez de Moreno and a class
2 of similarly situated females were subjected to unlawful sex harassment and that
3 Ms. Gonzalez de Moreno was subjected to retaliation for complaining about sex
4 harassment in violation of Title VII. All conditions precedent to the institution of
5 this lawsuit have been fulfilled.

6 12. Since in or about at least 2002, Defendants have engaged in unlawful
7 employment practices at its Reno, Nevada location, in violation of Section 703(a)
8 of Title VII, 42 U.S.C. §2000e-2(a)(1) by subjecting Ms. Gonzalez de Moreno
9 and other similarly situated female employees to sex harassment. The sex
10 harassment Ms. Gonzalez de Moreno and the other female employees were
11 subjected to, included but was not limited to, egregious and sometimes violent
12 sex harassment resulting in physical injury, unwelcome physical touching,
13 grabbing, forcibly undressing, choking, fondling and rubbing by Defendants'
14 employees as well as sexually charged, derogatory and/or demeaning comments
15 and speech and/or conduct by the victim's co-workers and/or supervisors.
16 Defendants, through their supervisors who witnessed and did nothing and/or
17 participated in such conduct, ratified the sex harassment.

18 13. When Ms. Gonzalez de Moreno rebuked and/or complained about
19 the sex harassment, Defendants' supervisors ostracized her and reduced her job
20 duties resulting in a tangible employment action. Defendants also failed to take
21 immediate and effective corrective action to prevent the harassment despite
22 repeated complaints from Ms. Gonzalez de Moreno and/or other female
23 employees about the harassment.

24 14. The effect of the practice(s) complained of in paragraphs 12 and 13
25 above has been to deprive Ms. Gonzalez de Moreno and other similarly situated
26 female employees of equal employment opportunities and otherwise adversely
27 affect their status as employees because of their sex and because Ms. Gonzalez de
28 Moreno complained about sex harassment.

1 15. Since in or about at least 2002, Defendants have engaged in unlawful
2 employment practices at its Reno, Nevada location, in violation of Section 704(a)
3 of Title VII, 42 U.S.C. § 2000e-3(a) by subjecting Ms. Gonzalez de Moreno to
4 retaliation for complaining about sex harassment.

5 16. The effect of the practices complained of above in paragraph 15 has
6 been to deprive Ms. Gonzalez de Moreno of equal employment opportunities and
7 to otherwise adversely affect her employment status because she engaged in
8 activity protected under Title VII.

9 17. The unlawful employment practices complained of in paragraphs 12
10 through 16 above were intentional.

11 18. The unlawful employment practices complained of in paragraphs 12
12 through 16 above were done with malice or with reckless indifference to the
13 federally protected rights of Ms. Gonzalez de Moreno and other similarly situated
14 female employees.

15 19. As a direct and proximate result of the aforesaid acts of Defendants,
16 Ms. Gonzalez de Moreno and other similarly situated female employees have
17 each suffered emotional pain, suffering, inconvenience, loss of enjoyment of life,
18 humiliation, and damages, according to proof.

19 20. As a direct and proximate result of the aforesaid acts of Defendants,
20 Ms. Gonzalez de Moreno and other similarly situated female employees suffered
21 a loss of earnings, compensation, benefits, and/or other pecuniary losses in an
22 amounts according to proof.

23 PRAYER FOR RELIEF

24 Wherefore, the Commission respectfully requests that this Court:

25 A. Grant a permanent injunction enjoining Defendants, their respective
26 officers, successors, assigns, agents, alter egos, and/or all persons in active
27 concert or participation with them, from engaging in any employment practice
28 which discriminates on the basis of sex and/or constitutes sexual harassment;

1 B. Grant a permanent injunction enjoining Defendants, their respective
2 officers, successors, assigns, agents, alter egos, and/or all persons in active
3 concert or participation with them, from retaliating against any employee who
4 engages in any protected activity under Title VII;

5 C. Order Defendants to institute and carry out policies, practices, and
6 programs which provide equal employment opportunities for women, and which
7 eradicate the effects of its past and present unlawful employment practices;

8 D. Order Defendants to make whole Ms. Gonzalez de Moreno and other
9 similarly situated female employees, by providing appropriate backpay with
10 prejudgment interest, and front pay in amounts to be determined at trial, and/or
11 other affirmative relief necessary to eradicate the effects of its unlawful
12 employment practices;

13 E. Order Defendants to make whole Ms. Gonzalez de Moreno and other
14 similarly situated female employees, by providing compensation for past and
15 future pecuniary losses, including but not limited to losses resulting from out of
16 pocket expenses, and/or other affirmative relief necessary to eradicate the effects
17 of its unlawful employment practices;

18 F. Order Defendants to make whole Ms. Gonzalez de Moreno and other
19 similarly situated female employees by providing compensation for past and
20 future non-pecuniary losses resulting from the unlawful practices complained of
21 in paragraphs 12 through 16 above, including, but not limited to emotional pain,
22 suffering, inconvenience, loss of enjoyment of life, and humiliation, in amounts to
23 be determined at trial;

24 G. Order Defendants to pay Ms. Gonzalez de Moreno and other
25 similarly situated female employees punitive damages for its malicious and
26 reckless conduct described in paragraphs 12 through 16 above, in amounts to be
27 determined at trial;

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1 H. Grant such further relief as the Court deems necessary and proper in
2 the public interest; and

3 I. Award the Commission its costs of this action.

4 JURY TRIAL DEMAND

5 The Commission requests a jury trial on all questions of fact raised by its
6 complaint.

7 Dated: May 27, 2004

Respectfully Submitted,

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