

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**DOCKETED**

AUG 20 2003

EQUAL EMPLOYMENT OPPORTUNITY )  
COMMISSION, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
SANCHEZ & DANIELS )  
 )  
Defendant. )

CIVIL ACTION NO. **03C 5822**  
JUDGE BUCKLO  
COMPLAINT  
JURY TRIAL DEMAND  
MAGISTRATE JUDGE MASON

NATURE OF THE ACTION

This is an action under Title VII of the Civil Rights Act of 1964, as amended, 2000e *et seq.* ("Title VII"), and Title I of the Civil Rights Act of 1991, 42 U.S.C. § 1981a, to correct unlawful employment practices on the basis of sex and to provide appropriate relief to Sevanne Sarkis ("Sarkis"), a former employee of Sanchez & Daniels ("Defendant"). Plaintiff, the U.S. Equal Employment Opportunity Commission (the "Commission"), contends Defendant discriminated against Sarkis because of her sex by subjecting her to sexual harassment in violation of Title VII.

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CLERK  
U.S. DISTRICT COURT

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 Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e-5(f)(1) and (3), and Section 102 of the Civil Rights Act of 1991, 42 U.S.C. §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

11

Illinois, Western Division.

**PARTIES**

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

4. At all relevant times, Defendant has continuously been and is now doing business in the State of Illinois and the City of Chicago and has continuously had at least fifteen (15) employees.

5. At all relevant times, Defendant has continuously been an employer engaged in an industry affecting commerce within the meaning of 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, Sarkis filed a charge 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 December 1999, Defendant has engaged in unlawful employment practices at its office in Chicago, Illinois in violation of Section 703(a)(1) of Title VII, 42 U.S.C. § 2000e-2(a)(1). These practices include, but are not limited to, engaging in intentional discrimination against Sarkis by subjecting her to sexual harassment. These practices include, but are not limited to, Sarkis being sexually harassed by a male co-worker in continuing violation of Section 703(a) of Title VII, 42 U.S.C. § 2000e-2(a).

8. The effect of the practices complained of in paragraph seven (7) above has been to deprive Sarkis of equal employment opportunities and otherwise adversely affect her status as an employee because of her sex.

9. The unlawful employment practices complained of in paragraph seven (7) above were and are intentional.

10. The unlawful employment practices complained of in paragraph seven (7) above were and are done with malice or with reckless indifference to the federally protected rights of Sarkis.

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 engaging in any employment practice which discriminates on the basis of sex;

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

C. Order Defendant to make whole Sarkis by providing compensation for past and future non-pecuniary losses, including emotional pain, suffering, inconvenience, loss of enjoyment of life and humiliation;

D. Order Defendant to pay Sarkis punitive damages for its malicious and/or reckless conduct described, in amounts to be determined at trial;

E. Order Defendant and its successors to provide training to its officers, managers

and employees regarding sexual harassment in the workplace;

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

G. 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,

Eric S. Dreiband  
General Counsel

James Lee  
Deputy General Counsel

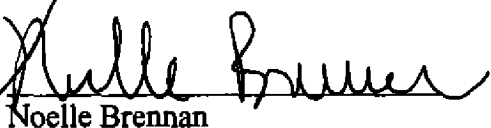
Gwendolyn Young Reams  
Associate General Counsel

EQUAL EMPLOYMENT OPPORTUNITY  
COMMISSION

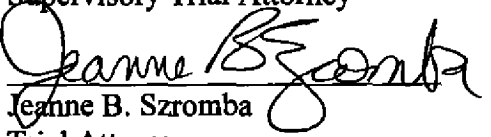
1801 "L" Street, N.W.  
Washington, D.C. 20501



John C. Hendrickson  
Regional Attorney



Noelle Brennan  
Supervisory Trial Attorney



Jeanne B. Szromba  
Trial Attorney

EQUAL EMPLOYMENT OPPORTUNITY  
COMMISSION

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*Cat*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

Civil Cover Sheet **03C 5822**

This automated JS-44 conforms generally to the manual JS-44 approved by the Judicial Conference of the United States in September 1974. The data is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. The information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is authorized for use only in the Northern District of Illinois.

JUDGE BUCKLO

MAGISTRATE JUDGE MASON

Plaintiff(s): **EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION**

Defendant(s): **SANCHEZ & DANIEL**

County of Residence:

County of Residence:

Plaintiff's Atty: **Jeanne B. Szromba  
Equal Employment Opportunity  
Commission  
500 W. Madison, Suite 2800  
Chicago, IL 60661  
312-353-7546**

Defendant's Atty: **Fay Clayton  
Robison Curley & Clayton  
P.C.  
300 S. Wacker Dr., Suite  
1700, Chicago, IL 60606**

FILED-EDS  
AUG 19 PM 4:56  
CLERK COURT  
U.S. DISTRICT COURT

II. Basis of Jurisdiction: **1. U.S. Gov't Plaintiff**

III. Citizenship of Principal  
Parties (Diversity Cases Only)

Plaintiff: - N/A  
Defendant: - N/A

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AUG 20 2003

IV. Origin : **1. Original Proceeding**

V. Nature of Suit: **442 Employment**

VI. Cause of Action: **Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e et seq. ("Title VII"), and Title I of the Civil Rights Act of 1991, 42 U.S.C. § 1981a, to correct unlawful employment practices on the basis of sex.**

VII. Requested in Complaint

Class Action:  
Dollar Demand:  
Jury Demand: **Yes**

VIII. This case **IS NOT** a refiling of a previously dismissed case.

Signature: *Jeanne B Szromba*

Date: 7/28/03

*1-2*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

EASTERN DIVISION

In the Matter of

Equal Employment Opportunity Commission  
v.  
Sanchez & Daniels

**03C 5822**  
Case Number:

**JUDGE BUCKLO**

APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEY(S) FOR:

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION MAGISTRATE JUDGE MASON

| (A)  |                            | (B)  |                            |
|--|----------------------------|--|----------------------------|
| SIGNATURE <i>Jeanne B Szromba</i>  |                            | SIGNATURE <i>Noelle Brennan</i>  |                            |
| NAME<br>Jeanne B. Szromba  |                            | NAME<br>Noelle C. Brennan  |                            |
| FIRM<br>Equal Employment Opportunity Commission  |                            | FIRM<br>Equal Employment Opportunity Commission  |                            |
| STREET ADDRESS<br>500 W. Madison, Suite 2800   |                            | STREET ADDRESS<br>500 W. Madison, Suite 2800   |                            |
| CITY/STATE/ZIP<br>Chicago, IL 60661  |                            | CITY/STATE/ZIP<br>Chicago, IL 60661  |                            |
| TELEPHONE NUMBER<br>312-353-7546   | FAX NUMBER<br>312-353-8555 | TELEPHONE NUMBER<br>312-353-7582   | FAX NUMBER<br>312-353-8555 |
| E-MAIL ADDRESS<br>jeanne.szromba@eeoc.gov  |                            | E-MAIL ADDRESS<br>noelle.brennan@eeoc.gov  |                            |
| IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)<br>ARDC No. 06207846                       |                            | IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)<br>ARDC No. 06228901                       |                            |
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| TRIAL ATTORNEY? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>      |                            | TRIAL ATTORNEY? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>      |                            |
|  |                            | DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>    |                            |
| SIGNATURE <i>John C. Hendrickson</i>   |                            | (D)  |                            |
| NAME<br>John C. Hendrickson  |                            | NAME   |                            |
| FIRM<br>Equal Employment Opportunity Commission  |                            | FIRM   |                            |
| STREET ADDRESS<br>500 W. Madison, Suite 2800   |                            | STREET ADDRESS   |                            |
| CITY/STATE/ZIP<br>Chicago, IL 60661  |                            | CITY/STATE/ZIP   |                            |
| TELEPHONE NUMBER<br>312-353-8551   | FAX NUMBER<br>312-353-8555 | TELEPHONE NUMBER   | FAX NUMBER                 |
| E-MAIL ADDRESS<br>john.hendrickson@eeoc.gov  |                            | E-MAIL ADDRESS   |                            |
| IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)<br>ARDC No. 01187589                       |                            | IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)  |                            |
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| TRIAL ATTORNEY? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>      |                            | TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>                 |                            |
| DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>    |                            | DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>    |                            |

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