

This is an action under Title VII of the Civil Rights Act of 1964 and Title I of the Civil Rights Act of 1991 to correct unlawful employment practices on the basis of sex (pregnancy), and to provide appropriate relief to Andrea Pitts who was adversely affected by such practices. As alleged with greater particularity in paragraph 7 below, the Commission alleges that Defendant Employer Fast Bolt Corporation discriminated against Andrea Pitts because of her sex (pregnancy) when, shortly after notifying Defendant of her pregnancy, Ms. Pitts' was terminated from her employment. As a result of the discrimination, Ms. Pitts suffered back pay losses and emotional distress damages.

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 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)("Title VII") and Section 102 of the Civil Rights Act of 1991, 42 U.S.C. § 1981a.

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

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, 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, Fast Bolt Corporation (Fast Bolt) (the "Employer"), has continuously been doing business in the State of New Jersey and the City of Hackensack, and has continuously had at least 15 employees.

5. At all relevant times, Defendant Employer 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, Andrea Pitts filed a charge with the Commission alleging violations of Title VII by Defendant Employer. All conditions

precedent to the institution of this lawsuit have been fulfilled.

7. Since at least on or about October 12, 2005, Defendant Employer has engaged in unlawful employment practices at its Hackensack, New Jersey facility, by unlawfully subjecting Ms. Pitts to discrimination because of her sex in violation of Section 703(a)(1) of Title VII, 42 U.S.C. § 2000e-2(a)(1). These unlawful practices include, but are not limited to, the following:

(a) In or about April 2004, Andrea Pitts began her employment with Defendant as a temporary employee performing clerical duties as an office clerk.

(b) On or about July 12, 2004, Defendant offered Ms. Pitts a permanent position as a file clerk and as a fill-in receptionist, which she accepted.

(c) Throughout Ms. Pitts' employment, Defendant advised her that her work was satisfactory, and she never received any criticism of her performance or discipline.

(d) On or about October 4, 2004, Ms. Pitts informed Defendant's Manager that she was pregnant.

(e) On or about October 8, 2004, Ms. Pitts advised Defendant's Manager that her pregnancy was a high risk pregnancy, and as a result, she needed to undergo a medical procedure on or about October 13, 2004. Ms. Pitts notified Defendant's manager that her medical procedure required her to take a week off from work, and Defendant's Manager approved Ms. Pitts' request for medical leave.

(f) On or about October 12, 2004, one day prior to Ms. Pitts' scheduled medical procedure, Defendant terminated her employment. Defendant informed Ms. Pitts that she was going to be replaced by a part-time employee who was then a high school student.

8. The effect of the practices complained of in paragraph 7(a)-(f) above have been to

deprive Andrea Pitts 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 paragraphs 7(a)-(f) above were intentional.

10. The unlawful employment practices complained of in paragraphs 7(a)-(f) above were done with malice or with reckless indifference to the federally protected rights of Andrea Pitts.

PRAYER FOR RELIEF

Wherefore, the Commission respectfully requests that this Court:

A. Grant a permanent injunction enjoining Defendant Employer, its officers, successors, assigns, and all persons in active concert or participation with it, from engaging in sex discrimination any other employment practice which discriminates on the basis of sex.

B. Order Defendant Employer 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 Employer to make whole Andrea Pitts, by providing appropriate backpay with prejudgment interest, in amounts to be determined at trial, and other affirmative relief necessary to eradicate the effects of its unlawful employment practices.

D. Order Defendant Employer to make whole Andrea Pitts, by providing compensation for past and future pecuniary losses resulting from the unlawful employment practices described in paragraphs 7(a) - (f) above, including job search expenses and medical benefits, in amounts to be determined at trial.

E. Order Defendant Employer to make whole Andrea Pitts by providing compensation for past and future nonpecuniary losses resulting from the unlawful practices complained of in paragraphs 7(a)-(f) above, including emotional pain, suffering, loss of enjoyment of life, and humiliation, in amounts to be determined at trial.

F. Order Defendant Employer to pay Andrea Pitts punitive damages for its malicious and reckless conduct described in paragraphs 7(a)-(f) above, in amounts to be determined at trial.

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

H. Award the Commission its costs of this action.

JURY TRIAL DEMAND

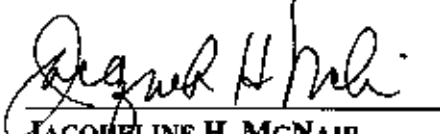
The Commission requests a jury trial on all questions of fact raised by its complaint.

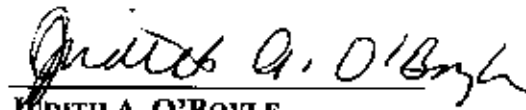
Respectfully submitted,


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