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AT SEATTLE
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WESTERN DISTRICT OF WASHINGTON
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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION,

Plaintiff,

v.

OLYMPIC SECURITY SERVICES, INC.,

Defendant.

CIVIL ACTION NO.

CV6 1390C

COMPLAINT

JURY TRIAL DEMAND

NATURE OF THE ACTION

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 religion and to provide appropriate relief to Elmer Taylor. The Equal Employment Opportunity Commission ("Commission") alleges that Defendant Olympic Security Services, Inc. ("Olympic Security") failed to accommodate Mr. Taylor's religious needs and refused to hire him on the basis of his religion. Plaintiff seeks injunctive and monetary relief, including pecuniary and nonpecuniary compensatory and punitive damages, on behalf of Mr. Taylor.

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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 sections 706(f)(1) and (3) of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. sections 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 Western District of Washington.

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) of Title VII, 42 U.S.C. §2000e-5(f)(1).
4. At all relevant times, Defendant Olympic Security has been a corporation continuously doing business in the State of Washington and has continuously had at least 15 employees.
5. At all relevant times, Defendant Olympic Security 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, Mr. Taylor filed a charge with the Commission alleging violations of Title VII by Olympic Security. All conditions precedent to the institution of this lawsuit have been fulfilled.

7. On or about June 14, 2005, defendant engaged in unlawful employment practices at its Tukwila, Washington office in violation of Civil Rights Act of 1964, §§ 703(a)(1), 42 U.S.C. , 2000e-2(a)(1). Defendant Olympic Security affected the terms and conditions of Mr. Taylor's employment by failing to accommodate his religious needs and failing to hire him because of his religion.

8. The effect of the practices complained of in paragraph 7 above has been to deprive Mr. Taylor of equal employment opportunities and otherwise adversely affect his status as an employee.

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 Mr. Taylor.

PRAYER FOR RELIEF

Wherefore, the Commission respectfully requests that this Court:

A. Grant a permanent injunction enjoining defendant, its officers, successors, agents, assigns, and all persons in active concert or participation with it, from engaging in any retaliatory employment practices.

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

1 C. Order defendant to make whole Mr. Taylor by providing compensation for past
2 and future pecuniary losses resulting from the unlawful employment practices described in
3 paragraph 7 above, including past and future out-of-pocket expenses, in amounts to be
4 determined at trial.

5 D. Order defendant to make whole Mr. Taylor by providing appropriate back pay
6 with prejudgment interest, in amounts to be determined at trial, and other affirmative relief
7 necessary to eradicate the effects of its unlawful employment practices.

8 E. Order defendant to make whole Mr. Taylor by providing compensation for past
9 and future nonpecuniary losses resulting from the unlawful practices complained of in paragraph
10 7 above, including without limitation emotional pain, suffering, and loss of enjoyment of life, in
11 amounts to be determined at trial.

12 F. Order defendant to pay Mr. Taylor punitive damages for its malicious and
13 reckless conduct described in paragraph 7 above, in amounts to be determined at trial.

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

16 H. Award the Commission its costs of this action.

17
18 JURY TRIAL DEMAND

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

20 DATED this 26th day of September, 2006.

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