



enforcement of Title VII and is authorized to bring this action by § 706(f)(1) of Title VII, 42 U.S.C. § 2000e-5(f)(1).

3. Plaintiff-intervenor Chrystal Bradshaw is an adult female citizen of the United States who resides in Iredell County, North Carolina. Plaintiff-intervenor is entitled to intervene as a matter of right, pursuant to § 706(f)(1) of Title VII, 42 U.S.C. § 2000e-5(f)(1).

4. At all relevant times, defendants Nationwide Electrical Contracting Inc. and Douglas Electrical Contracting Inc. (hereinafter referred to as the “corporate defendants”) have continuously been North Carolina corporations doing business in North Carolina, subject to the jurisdiction of the Court. Defendants’ primary place of business is located in Iredell County, North Carolina.

5. Defendants have continuously had at least 15 employees in each of 20 or more calendar weeks during each year pertinent to plaintiff-intervenor’s claims. They are employers engaged in an industry affecting commerce, as defined by §§ 701(b), (g) and (h) of Title VII, 42 U.S.C. § 2000e(b), (g) and (h).

6. Plaintiff-intervenor was employed by the defendants in September 1996. She continued in that position until she was constructively discharged on April 22, 1998.

7. Upon information and belief, the two corporate defendants are alter egos of the other and have been operated in such a way as to avoid their legitimate debts and obligations. The corporate defendants are there equally culpable for the wrongs alleged below.

8. Throughout the period of plaintiff-intervenor’s employment, the defendants, acting through their primary owner and chief executive officer, Franklin D. Black, Jr., created an unwelcome and hostile working environment by subjecting her to a series of unwelcome and unsought kisses, hugs, touching and lurid comments.

9. Upon information and belief, the said Franklin D. Black, Jr., is the alter ego of the

two corporate defendants, and plaintiff-intervenor is entitled to pursue her claims against Black individually and in his capacity as alter ego for the corporate defendants.

10. More than thirty days prior to the institution of this lawsuit, plaintiff-intervenor filed a timely charge of discrimination with the Commission, alleging violations of Title VII by the defendants. All conditions precedent to the institution of this action have been fulfilled.

11. Defendants' actions have deprived plaintiff-intervenor of equal employment opportunities and have otherwise adversely affected her status as an employee because of her sex.

12. As a proximate result of the defendants' actions, plaintiff-intervenor has been damaged, in incurring lost wages, embarrassment, humiliation, physical illness and emotional distress.

13. The defendants' actions have caused plaintiff severe emotional distress.

14. The defendants' actions are outrageous and exceed all bounds of civilized conduct.

15. Plaintiff-intervenor is entitled to recover punitive damages from the defendants.

*FIRST CLAIM FOR RELIEF*

16. Defendants' actions violate § 703(a) of Title VII, 42 U.S.C. § 2000e-2(a).

*SECOND CLAIM FOR RELIEF*

17. Defendants' actions constitute intentional infliction of emotional distress under North Carolina law.

*THIRD CLAIM FOR RELIEF*

18. Defendants' actions constitute wrongful discharge in violation of North Carolina public policy, in violation of G.S. § 143-422.2.

WHEREFORE, plaintiff-intervenor prays the Court for relief:

(a) Granting a permanent injunction enjoining the defendants, their officers, agents,

successors in interest and all persons in active concert or participation with them, from engaging in policies or practices which discriminate because of sex against plaintiff-intervenor in violation of Title VII;

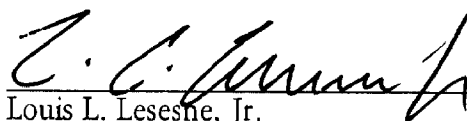
(b) Enjoining the defendants to make plaintiff-intervenor whole by providing reinstatement, back pay, prejudgment interest, front pay, and other affirmative relief necessary to eradicate the effects of its unlawful practices;

(c) Awarding plaintiff-intervenor compensatory damages for all damages sustained as a result of the defendants' illegal activities, the said liability to be charged jointly and severally to the defendants;

(d) Awarding plaintiff-intervenor punitive damages in an amount to be determined by the jury, the said liability to be charged jointly and severally to the defendants;

(e) Taxing the costs of this action, including reasonable attorney fees and expenses, against the defendants; and

(f) Granting such further relief as the Court deems necessary and proper.



Louis L. Lesesne, Jr.  
Lesesne & Connette  
1001 Elizabeth Avenue, Suite 1-D  
Charlotte, N.C. 28204-2234  
704/372-5700  
N.C. State Bar No. 6723

Attorney for Plaintiff-Intervenor

PLAINTIFF-INTERVENOR DEMANDS TRIAL  
BY JURY OF ALL ISSUES OF FACT

CERTIFICATE OF SERVICE

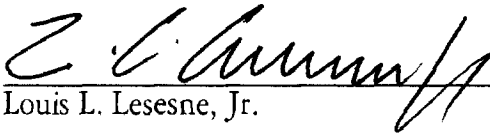
I hereby certify that I have served the foregoing document on all parties by mailing copies by first-class mail to the following addresses:

Ms. Erania Ebron Fubara  
Equal Employment Opportunity Commission  
129 W. Trade St., Suite 400  
Charlotte NC 28202

Nationwide Electrical Contracting Inc.  
c/o Mary F. Black, Registered Agent  
206-B Signal Hill Dr.  
Statesville NC 28677

Douglas Electrical Contracting Inc.  
c/o Mary F. Black, Registered Agent  
707 St. Cloud Dr.  
Statesville NC 28677.

Dated: November 29, 2000.

  
\_\_\_\_\_  
Louis L. Lesesne, Jr.