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IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
1999 SEP 16 P 1:18 NORTHERN DIVISION

FILED

SEP 16 1999

TERESA D. HACKETT, CLK  
U.S. DISTRICT COURT  
EQUAL EMPLOYMENT OPPORTUNITY  
COMMISSION

CLERK  
U. S. DISTRICT COURT  
MIDDLE DIST. OF ALA.

Plaintiff,

Civil Action No. 99-T-1089-N

vs.

ALADAN CORPORATION/  
LONDON INTERNATIONAL GROUP

Defendants.

COMPLAINT

JURY TRIAL DEMAND

NATURE OF THE ACTION

This is an action brought under Title VII of the Civil Rights Act of 1964, to correct unlawful employment practices on the basis of race and to make whole Loretta Johnson, Molinda Jacobs, Mary Culver, Joann Ford, Alicia Green and a class of employees aggrieved by the unlawful practices. The Defendant discriminated against Loretta Johnson, Molinda Jacobs, Mary Culver, Joann Ford and other similarly situated individuals by subjecting them to racially hostile harassment, sexually hostile harassment, different terms and conditions of employment based upon race and discharge based upon race and/or retaliation.

### 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 §§ 704(a), 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. Section 1981A.

2. The unlawful employment practices alleged below were and are now being committed within the jurisdiction of the United States District Court for the Middle District of Alabama, Northern Division.

### PARTIES

3. The Plaintiff, Equal Employment Opportunity Commission (the "Commission"), is an 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 § 706(f)(1) of Title VII, 42 U.S.C. § 2000e-5(f)(1).

4. At all relevant times, the Defendant, Aladan Corporation/London International Group (the "Employer") has been doing business in the State of Alabama and the City of Eufaula, and has had at least fifteen (15) employees.

5. At all relevant times, the Defendant Employer has continuously been and is now an employer engaged in an industry affecting commerce within the meaning of § 701(b), (g) and (h) of Title VII, 42 U.S.C. § 2000e-(b), (g) and (h).

STATEMENT OF CLAIMS

6. More than thirty (30) days prior to the institution of this lawsuit, Loretta Johnson, Molinda Jacobs, Mary Culver, Joann Ford and Alicia Green filed Charges of Discrimination with the Commission alleging violations of Title VII by the Defendant. All conditions precedent to the institution of this lawsuit have been fulfilled.

7. Since at least on or about March 5, 1995, the Defendant has engaged in unlawful employment practices at its Eufaula, Alabama facility in violation of §§ 703(a)(1), 704(a) and 709(c) of Title VII, 42 U.S.C. § 2000e-2(a)(1), 3(a) and 8(c). These practices include subjecting the Defendants' employees to racially hostile harassment, sexually hostile harassment, different terms and conditions of employment based upon race and discharge based upon race and/or retaliation.

8. The effect of the practices complained of above has been to deprive Loretta Johnson, Molinda Jacobs, Mary Culver, Joann Ford, Alicia Green and other similarly situated individuals of equal employment opportunities and otherwise adversely affect their status as employees, because of their race, sex and in retaliation for their protest of racial harassment.

9. The unlawful employment practices complained of above were intentional.

10. The unlawful employment practices complained of above were done with malice and/or reckless indifference to the federally

protected rights of Loretta Johnson, Molinda Jacobs, Mary Culver, Joann Ford, Alicia Green and other similarly situated individuals.

PRAYER FOR RELIEF

WHEREFORE, the Commission respectfully requests that this Court:

A. Grant a permanent injunction enjoining the Defendants, their officers, agents, successors, assigns and all persons in active concert or participation with them, from engaging in any employment practices which discriminate on the basis of race, sex or which retaliate against persons because they refuse to submit to racial and/or sexual harassment and/or because they report the racial and/or sexual harassment.

B. Order the Defendants to institute and carry out policies, practices and programs which provide equal employment opportunities for all of their employees regardless of race or sex and which eradicate the effects of their past and present unlawful employment practices.

C. Order the Defendants to make whole Loretta Johnson, Molinda Jacobs, Mary Culver, Joann Ford, Alicia Green and other similarly situated individuals adversely affected or aggrieved by the unlawful employment practices described above by providing, where appropriate, back pay with prejudgment interest, in amounts to be determined at trial, and other affirmative relief necessary to eradicate the effects of their unlawful employment practices, including but not limited to reinstatement.

D. Order the Defendants to make whole Loretta Johnson, Molinda Jacobs, Mary Culver, Joann Ford, Alicia Green and other similarly situated individuals adversely affected or aggrieved by the unlawful employment practices described above by providing compensation for past and future pecuniary losses, including medical expenses and job search expenses.

E. Order the Defendants to make whole Loretta Johnson, Molinda Jacobs, Mary Culver, Joann Ford, Alicia Green and other similarly situated individuals adversely affected or aggrieved by the unlawful employment practices described above by providing them with compensation for non-pecuniary losses, including pain and suffering, emotional distress, humiliation, isolation, depression, loss of credit, and loss of enjoyment of life.

F. Order the Defendants to pay Loretta Johnson, Molinda Jacobs, Mary Culver, Joann Ford, Alicia Green and other similarly situated individuals adversely affected or aggrieved by the unlawful employment practices described above punitive damages for their malicious and/or reckless conduct, in an amount to be determined at trial.

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

H. Award the Commission its costs in this action.

#### JURY TRIAL DEMAND

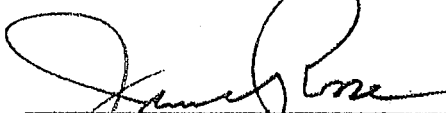
The Commission requests a jury trial on all questions of fact raised by the Amended Complaint.

Respectfully submitted,

C. GREGORY STEWART  
General Counsel (Designate)

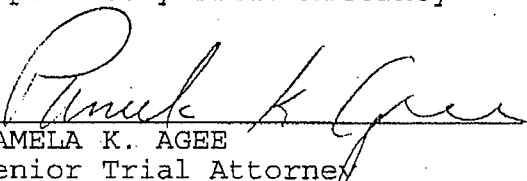
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