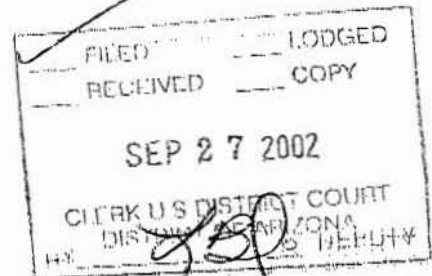


1 Mary Jo O'Neill #005924
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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

Equal Employment Opportunity
Commission,
Plaintiff,
vs.
Alamo Rent-A-Car LLC, ANC Rental
Corporation,
Defendants.

CW '02 1908 PHX ROS

COMPLAINT

(Jury Trial Demanded)

NATURE OF THE ACTION

This is an action under 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 religion and to provide appropriate relief to Bilan Nur who was adversely affected by such practices. The EEOC alleges Defendants Alamo Rent-A-Car LLC and ANC Rental Corporation (hereinafter referred to as "Alamo") discriminated against Bilan Nur because of her religion, Islam, by failing to accommodate her religious beliefs, and disciplining, suspending and discharging her because of her religion.

(1)

1 7. Since at least November, 2001 Defendants have engaged in
2 unlawful employment practices at one of its Phoenix, Arizona facilities in violation
3 of Section 703(a) of Title VII, 42 U.S.C. § 2000e-2(a) by discriminat-ing against
4 Bilan Nur on the basis of her religion when they failed to accommodate her
5 religious beliefs and when they disciplined her, suspended her and discharged
6 her because of her religion.

7 8. Respondent, Alamo Rental Car, refused to accommodate Charging
8 Party Bilan Nur's religious beliefs, disciplined and suspended her because of her
9 religion, Islam, and terminated her from her position as Customer Service
10 Representative because of her religion, Muslim.

11 9. Ms. Nur, who was 20 years old at the time of the termination,
12 recently immigrated to the United States from Somalia during Somalia's civil war.

13 10. In November, 1999, Defendants hired Ms. Nur as a Customer
14 Service Representative.

15 11. In this position, she worked at the front desk, greeted customers,
16 rented them cars and dealt with customer service issues. This was one of Ms.
17 Nur's first job in the United States.

18 12. Ms. Nur's job performance was exemplary up until her termination.

19 13. Ms. Nur's Muslim faith requires her to cover her head with a scarf
20 during the month of Ramadan.

21 14. Respondent permitted Ms. Nur to observe this religious belief of
22 wearing a head scarf during Ramadan in 1999 and 2000.

23 15. In or around late November/early December, 2001, Defendants'
24 City Manager told Ms. Nur for the first time that she was in violation of the dress
25 code for wearing the scarf and mandated that she remove it.

26 16. She was told by Defendants that she had to remove the head scarf
27 or she would be fired.

28

1 B. Order Defendants to institute and carry out policies, practices, and
2 programs which provide equal employment opportunities for employees
3 regardless of their religious beliefs and for those who oppose unlawful
4 employment discrimination, and which eradicate the effects of its past and
5 present unlawful employment practices.

6 C. Order Defendants to make whole Bilan Nur by providing appropriate
7 backpay with prejudgment interest, in amounts to be determined at trial, and
8 other affirmative relief necessary to eradicate the effects of its unlawful
9 employment practices, including, but not limited to, rightful place reinstatement.

10 D. Order Defendants to make whole Bilan Nur by providing
11 compensation for past and future pecuniary losses resulting from the unlawful
12 employment practices described above, in amounts to be determined at trial.

13 E. Order Defendants to make whole Bilan Nur by providing
14 compensation for past and future non-pecuniary losses resulting from the
15 unlawful practices described above, including emotional pain, suffering,
16 inconvenience, loss of enjoyment of life and humiliation, in amounts to be
17 determined at trial.

18 F. Order Defendants to pay punitive damages to Bilan Nur for its
19 malicious and/or reckless conduct, described above, in amounts to be determined
20 at trial.

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

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

24 **JURY TRIAL DEMAND**

25 The Commission requests a jury trial on all questions of fact raised by this
26 Complaint.
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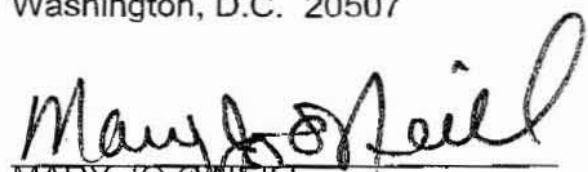
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DATED this 27th day of September, 2002.

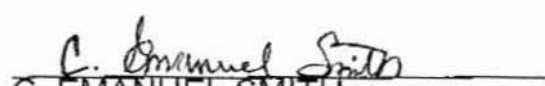
Respectfully submitted,

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Associate General Counsel


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