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8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10
11 EQUAL EMPLOYMENT OPPORTUNITY
12 COMMISSION,

13 Plaintiff,

14 v.

15 MEADOWVIEW COMMUNITY
16 ACTION, INC.,

17 Defendant.

Civil Action No.

COMPLAINT

Civil Rights - Employment
Discrimination

JURY TRIAL DEMAND

18
19 NATURE OF THE ACTION

20 This action is brought pursuant to Title VII of the Civil Rights Act of 1964 and
21 Title I of the Civil Rights Act of 1991 to correct unlawful employment practices on the
22 basis of sex, and to provide appropriate relief to Lacey Wesley and Laney Wesley, who
23 were adversely affected by such practices. Defendant Meadowview Community Action
24 subjected Lacey Wesley and Laney Wesley to unlawful disparate treatment based on
25 their sex.

26 JURISDICTION AND VENUE

27 1. Jurisdiction of this Court is invoked pursuant to 28 U.S.C. §§451, 1331,
28 1337, 1343 and 1345. This action is authorized and instituted pursuant to §706(f)(1) and

1 (3) of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §2000e-5(f)(1) and
2 (3) ("Title VII") and §102 of the Civil Rights Act of 1991, 42 U.S.C. §1981a.

3 2. The employment practices alleged to be unlawful were and are now being
4 committed within the jurisdiction of the United States District Court for the Eastern
5 District of California, Sacramento division.

6 **INTRADISTRICT ASSIGNMENT**

7 3. This action is appropriate for assignment to Sacramento because
8 Defendant's principal place of business is in Sacramento County.

9 **PARTIES**

10 4. Plaintiff, the Equal Employment Opportunity Commission
11 ("Commission") is the agency of the United States of America charged with the
12 administration, interpretation and enforcement of Title VII, and is expressly authorized
13 to bring this action by §706(f)(1) and (3) of Title VII, §2000-e(f)(1) and (3).

14 5. Defendant Meadowview Community Action is a California corporation,
15 doing business in the State of California, in the County of Sacramento, and has
16 continuously had at least 15 employees.

17 6. At all relevant times, Defendant Meadowview Community Action,
18 (hereinafter "Defendant") has continuously been an employer engaged in an industry
19 affecting commerce, within the meaning of §701(b), (g) and (h) of Title VII, 42 U.S.C.
20 §2000-e(b), (g) and (h).

21 **STATEMENT OF CLAIM**

22 **On Behalf of the Charging Party**
23 **Violation of Title VII of Civil Rights Act Based on Sex Discrimination**

24 7. More than thirty days prior to the institution of this lawsuit, Lacey Wesley
25 and Laney Wesley (hereinafter "Charging Parties") filed charges with Plaintiff
26 Commission alleging violations of Title VII by Defendant. All conditions precedent to
27 the institution of this lawsuit have been fulfilled.
28

1 employment practices complained of above, including but not limited to out-of-pocket
2 expenses necessitated by Defendant's unlawful conduct, in amounts to be determined at
3 trial.

4 E. Order Defendant to make Charging Parties whole by providing
5 compensation for past and future nonpecuniary losses resulting from the unlawful
6 practices complained of above including, but not limited to emotional pain and
7 suffering, inconvenience, loss of enjoyment of life and humiliation, in amounts to be
8 determined at trial.

9 F. Order Defendant to pay Charging Parties punitive damages for the
10 malicious and reckless conduct described above, in amounts to be determined at trial.

11 G. Grant such further relief as the Court may deem just and proper in the
12 public interest.

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

14 **DEMAND FOR JURY TRIAL**


15 Pursuant to the provisions of Federal Rule of Civil Procedure 38(b), Plaintiff hereby
16 demands a jury trial.

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21 Dated: 7/11/06


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23 Dated: 7/11/06


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25 Dated: July 11, 2006


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