

1 A. LUIS LUCERO, JR., REGIONAL ATTORNEY
2 CLAIRE CORDON, SUPERVISORY TRIAL ATTORNEY
3 KATHRYN OLSON, SENIOR TRIAL ATTORNEY
4 EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
5 909 FIRST AVENUE, SUITE 400
6 SEATTLE, WASHINGTON 98104
7 TEL: (206) 220-6915

ORIGINAL

U.S. COURTS
99 DEC 29 AM 10:54
REC'D
CAMPBELL S. BURKE
CLERK
IDAHO

12 UNITED STATES DISTRICT COURT
13 FOR THE DISTRICT OF IDAHO

14 EQUAL EMPLOYMENT OPPORTUNITY
15 COMMISSION,)

16 Plaintiff,)

17 v.)

18 FIDELITY FINANCIAL SERVICES OF IDAHO,
19 INC.)

20 Defendant.)

CW99-0610-S-BWA

CIVIL ACTION NO.

COMPLAINT

JURY TRIAL DEMAND

21 NATURE OF THE ACTION

22 This is an action under Title VII of the Civil Rights Act of 1964 and Title I of the Civil
23 Rights Act of 1991 to correct unlawful employment practices on the basis of sex and retaliation and
24 to provide appropriate relief to Stacie Schiffer. The Equal Employment Opportunity Commission
25 alleges that defendant subjected Ms. Schiffer to hostile work environment sexual harassment,
26 retaliation and constructive discharge. Plaintiff seeks monetary and injunctive relief, including
27 pecuniary and nonpecuniary compensatory damages and punitive damages.

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
Seattle District Office
Federal Office Building
909 First Avenue, Suite 400
Seattle, Washington 98104-1061
Telephone (206) 220-6883
Fax (206) 220-6911
TDD (206) 220-6882

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

3 2. The employment practices alleged to be unlawful were committed within the
4 jurisdiction of the United States District Court for the District of Idaho.

5 PARTIES

6 3. Plaintiff, the Equal Employment Opportunity Commission (the "Commission"), is the
7 agency of the United States of America charged with the administration, interpretation and
8 enforcement of Title VII, and is expressly authorized to bring this action by Section 706(f)(1) of
9 Title VII, 42 U.S.C. §2000e-5(f)(1).

10 4. At all relevant times, defendant Fidelity Financial Services, Inc. ("Fidelity") has been
11 a corporation continuously doing business in the State of Idaho and has continuously had at least 15
12 employees.

13 5. At all relevant times, defendant Fidelity has continuously been an employer engaged
14 in an industry affecting commerce within the meaning of Sections 701(b), (g) and (h) of Title VII, 42
15 U.S.C. §§2000e-(b), (g) and (h).

16 STATEMENT OF CLAIMS

17 6. More than thirty days prior to the institution of this lawsuit, Stacie Schiffer filed a
18 charge with the Commission alleging violations of Title VII by defendant Fidelity. All conditions
19 precedent to the institution of this lawsuit have been fulfilled.

20 7. Beginning on or before April 1998, defendant Fidelity engaged in unlawful
21 employment practices at its Idaho facilities in violation of §§ 703(a) and 704(a) of Title VII, 42
22 U.S.C. §§ 2000e-2(a) and -3(a). Defendant Fidelity affected the terms and conditions of Ms.
23 Schiffer's employment by subjecting her to ongoing harassment based on sex, retaliation and
24 constructive discharge.

25 8. The effect of the practices complained of in paragraph 7 above has been to deprive
26 Ms. Schiffer of equal employment opportunities and otherwise adversely affect her status as an
27 employee because of her sex.

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
Seattle District Office
Federal Office Building
909 First Avenue, Suite 400
Seattle, Washington 98104-1061
Telephone (206) 220-6883
Fax (206) 220-6911
TDD (206) 220-6882

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

JURY TRIAL DEMAND

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

DATED this 28th day of December, 1999.

A. LUIS LUCERO, JR.
Regional Attorney

C. GREGORY STEWART
General Counsel

CLAIRE CORDON
Supervisory Trial Attorney

GWENDOLYN YOUNG REAMS
Associate General Counsel

KATHRYN OLSON
Senior Trial Attorney

BY: A. Luis Lucero Jr.

EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION
Seattle District Office
909 First Avenue, Suite 400
Seattle, Washington 98104
Telephone (206) 220-6915

EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION
Office of the General Counsel
1801 "L" Street, N.W.
Washington, D.C. 20507

Attorneys for Plaintiff