

PARTIES

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

4. At all relevant times, Defendant J.D. Streett & Company, Inc. has continuously been doing business in the State of Illinois and the city of Harrisburg, and has continuously had at least 15 employees.

5. At all relevant times, J.D. Streett & Company, Inc., has continuously been an employer engaged in an industry affecting commerce within the meaning of Sections 701(b), (g) and (h) of Title VII, 42 U.S.C. §§ 2000e(b), (g) and (h).

6. At all relevant times, Beverly Sanders, Connie Stacey, Tammy Thompson, Julie Wolf and other women for whom the EEOC is seeking relief, worked at a J.D. Streett & Company, Inc.'s BP store (formerly Zephyr) located at 630 North Commercial St. in Harrisburg, Illinois ("Harrisburg BP").

STATEMENT OF CLAIMS

7. More than thirty days prior to the institution of this lawsuit, Beverly Sanders and Connie Stacey filed charges with the Commission alleging violations of Title VII by J.D. Streett & Company, Inc. All conditions precedent to the institution of this lawsuit have been fulfilled.

8. Since at least July 2000, J.D. Streett & Company, Inc. has engaged in unlawful employment practices at the Harrisburg BP, in violation of Section 703(a) of Title VII, 42 U.S.C. § 2000e-2(a), as follows:

- (a) J.D. Streett & Company, Inc. subjected Beverly Sanders to unlawful sexual harassment during her employment. The unlawful conduct was unwelcome, sexual in nature, and directed at Sanders because of her sex. The unlawful conduct was sufficiently severe or pervasive to create a hostile working environment for Sanders, which altered the terms or conditions of her employment. The hostile working environment created by Defendant made Sanders' working conditions so intolerable that she had no choice but to quit.
- (b) J.D. Streett & Company, Inc. subjected Connie Stacey, Tammy Thompson, Julie Wolf and other female employees to unlawful sexual harassment during their employment. The unlawful conduct was unwelcome, sexual in nature, and directed at them because of their sex. The unlawful conduct was sufficiently severe or pervasive to create a hostile working environment for them, which altered the terms or conditions of their employment.

9. The effect of the practices complained of in paragraphs 8 above has been to deprive Beverly Sanders, Connie Stacey, Tammy Thompson, Julie Wolf and other women of equal employment opportunities and otherwise adversely affect their status as employees because of their sex.

10. The unlawful employment practices complained of in paragraphs 8 above were intentional.

11. The unlawful employment practices complained of in paragraphs 8 above were done with malice or with reckless indifference to the federally protected rights of Beverly Sanders, Connie Stacey, Tammy Thompson, Julie Wolf and other women.

PRAYER FOR RELIEF

Wherefore, the Commission respectfully requests that this Court:

A. Grant a permanent injunction enjoining J.D. Streett & Company, Inc., its officers, successors, assigns, and all persons in active concert or participation with it, from engaging in harassment, constructive discharge and any other employment practice which discriminates on the basis of sex.

B. Order J.D. Streett & Company, Inc. to institute and carry out policies, practices, and programs which provide equal employment opportunities for women, and which eradicate the effects of its past and present unlawful employment practices.

C. Order J.D. Streett & Company, Inc. to make Beverly Sanders, Connie Stacey, Tammy Thompson, Julie Wolf and other women whole by providing compensation for past and future pecuniary losses resulting from its unlawful employment practices in amounts to be determined at trial.

D. Order J.D. Streett & Company, Inc. to make Beverly Sanders, Connie Stacey, Tammy Thompson, Julie Wolf and other women whole by providing compensation for past and future non-pecuniary losses resulting from the unlawful employment practices described in paragraphs 8 above, including, but not limited to, emotional pain, suffering, inconvenience, loss of enjoyment of life, loss of reputation, and humiliation, in amounts to be determined at trial.

- E. Order J.D. Streett & Company, Inc. to pay punitive damages for its malicious and reckless conduct described in paragraphs 8 above in amounts to be determined at trial.
- F. Grant such further relief as the Court deems necessary and proper in the public interest.
- G. Award the Commission its costs of this action.

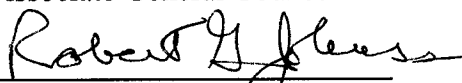
JURY TRIAL DEMAND

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

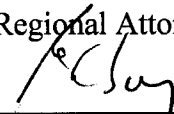
Respectfully submitted,

JAMES L. LEE
Deputy General Counsel

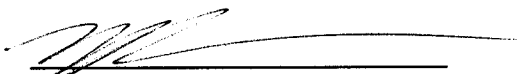
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