

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

DOCKETED
AUG 09 2002

**JEROME MILES, by his next friend
SHARI YOUNG,**

Plaintiffs,

v.

**KFC OF AMERICA, INC., d/b/a
KENTUCKY FRIED CHICKEN,**

Defendant.

No. **02C 5677**

JUDGE LINDBERG

Jury Trial Requested

MAGISTRATE JUDGE ASHMAN

COMPLAINT

NOW COMES Plaintiffs, JEROME MILES, by his next friend SHARI YOUNG, by and through their attorneys, LISA KANE & ASSOCIATES, P.C., and complaining of Defendant, KFC OF AMERICA, INC., d/b/a KENTUCKY FRIED CHICKEN, states as follows:

02 AUG 19 09 16 20
U.S. DISTRICT COURT

PRELIMINARY STATEMENT

1. This is an action seeking redress for the violation of rights guaranteed to Plaintiff JEROME MILES under the Americans With Disabilities Act of 1990 ("ADA"), as amended, 42 U.S.C. § 12101 et seq. Plaintiffs seek mandatory injunctive relief and damages to redress Defendant's discriminatory employment practices.

JURISDICTIONAL STATEMENT

2. Jurisdiction of this Court is invoked pursuant to 28 U.S.C. § 1343(a)(3) and (4) and 28 U.S.C. § 1331 to secure protection of and to redress deprivation of rights secured by 42 U.S.C. § 12117. Plaintiffs seek declaratory relief pursuant to 28 U.S.C. § 2201 and 2202.

VENUE

3. Venue is proper under 28 U.S.C. § 1391 (b)(1) and (2).

1-1

PARTIES

4. Plaintiff JEROME MILES is a mentally retarded United States citizen, aged 41 years old, who resides in Chicago, Illinois. Plaintiff SHARI YOUNG is a United States citizen, aged 42 years old, who resides in Chicago, Illinois. SHARI YOUNG is the sister of JEROME MILES and remains qualified to act as his representative in this action.

5. Defendant, KFC OF AMERICA, INC., d/b/a KENTUCKY FRIED CHICKEN, is a corporation properly recognized and sanctioned by the laws of the State of Illinois, which has continuously, and does now employ more than fifteen employees and is engaged in an industry that affects commerce. Defendant is an employer for purposes of 42 U.S.C. § 12101 *et seq.*

PROCEDURE

6. Plaintiff JEROME MILES filed a Charge of Discrimination with the Equal Employment Opportunity Commission (“EEOC”) on June 28, 2002. The EEOC issued Plaintiff a Notice of Right to Sue on July 11, 2002, which was received on July 18, 2002. The Notice of Right to Sue entitles Plaintiff to initiate a civil action in the appropriate forum within ninety (90) days of the receipt of said Notice. Plaintiff initiated this action within said ninety (90) day period.

COUNT I – ADA DISABILITY DISCRIMINATION

7. Paragraphs one (1) through six (6) are incorporated by reference as if fully set out herein.

8. Plaintiff JEROME MILES (“MILES”) has been mentally retarded since birth, which primarily hinders his ability to understand information. Plaintiff MILES can follow directions with clear and simple communication.

9. At all times relevant to this action, Plaintiff MILES suffered from a mental impairment that substantially limited him in multiple major life activities, including but not limited

to, learning, within the meaning of § 12102(2)(c) of the ADA.

10. At all times relevant to this action, Plaintiff MILES had a perceived mental impairment that substantially limited him in multiple major life activities, including but not limited to, learning, within the meaning of § 12102(2)(c) of the ADA.

11. On July 20, 2001, Defendant hired Plaintiff MILES into an entry-level position at its restaurant located at 1617 East 95th Street, Chicago, Illinois.

12. Plaintiff MILES was hired through the Illinois Mental Program, and a representative of this program spoke with the restaurant's head manager and Defendant's regional manager about Plaintiff MILES' disability and his ability to perform basic duties.

13. Plaintiff MILES has performed to Defendant's reasonable satisfaction at all times throughout his employment with Defendant.

14. Beginning in February 2002, Plaintiff MILES has been subjected to a continuous course of threats, comments, insults, ridicule, and harassment based on his actual or perceived disability, including but not limited to:

- a. Female managers and coworkers demanded that Plaintiff MILES give them money. After Plaintiff MILES refused to do so, managers required that he punch out hours before his shift was over and leave early.
- b. Managers yelled and cursed at Plaintiff MILES on a regular basis without any provocation by Plaintiff MILES.
- c. Managers refused to provide Plaintiff MILES with breaks until the end of his shift, while similarly situated non-disabled employees receive breaks throughout their shifts.

15. On June 10, 2002, Manager Stephanie Raglin asked Plaintiff MILES for \$20. When

Plaintiff MILES refused to give Manager Raglin this money, Raglin told Plaintiff MILES to punch out and go home.

16. When Plaintiff MILES returned home, Plaintiff SHARI YOUNG (“YOUNG”) contacted the restaurant and Manager Octavia Bolden cursed at her. From 10:00 a.m. to 10:00 p.m. on June 10th, managers at the restaurant called Plaintiffs’ home and made threatening comments to their family. These threats did not end until Plaintiffs’ brother told Manager Raglin that the restaurant was discriminating against Plaintiff MILES because of his disability.

17. On June 11th, Plaintiff YOUNG advised Defendant’s regional manager, John Malloy, of the threats made by the managers and the misconduct directed at Plaintiff MILES’ actual or perceived disability. Malloy stated that he would speak to the employees at the restaurant.

18. Malloy never contacted Plaintiffs regarding the June 11th complaint.

19. When Plaintiff MILES returned to work on June 12th, Managers Raglin and Bolden continued to make threatening comments concerning Plaintiff YOUNG. Plaintiff MILES was sent home after less than an hour at the restaurant.

20. After Plaintiff MILES was sent home on June 12th, Defendant failed to advise Plaintiff MILES of his next work day.

21. On June 25, 2002, Plaintiff MILES was constructively discharged due to the harassing conditions at the restaurant and Defendant’s failure to correct such harassment, as he had no real choice but to quit.

22. As a direct and proximate result of the aforementioned discriminatory acts of Defendant, Plaintiff MILES has endured adverse terms and conditions of his employment with Defendant in the form of disparate treatment compared to non-disabled employees, a hostile work environment created based on his actual or perceived disability, and being constructively discharged.

23. The aforementioned acts of Defendant constitute unlawful discrimination against Plaintiff MILES because of his actual or perceived disability, in violation of the provisions of Title I of the ADA, as amended, 42 U.S.C. § 12101 et seq.

24. As a direct and proximate result of the above alleged willful and reckless acts or omissions of Defendant, Plaintiff MILES has suffered damages, including but not limited to, lost and foregone wages and benefits, and physical and emotional harm.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request that this Court:

A. Declare the conduct of the Defendant to violate rights guaranteed to Plaintiff MILES under appropriate federal law;

B. Grant a permanent injunction restraining Defendant, its officers, successors, assigns, and all other persons in active concert or participation with them, from engaging in any employment practices which unlawfully discriminates on the basis of disability;

C. Order Defendant to make whole JEROME MILES by providing the affirmative relief necessary to eradicate the effects of the Defendant's unlawful practices;

D. Grant Plaintiff MILES any consequential, compensatory, punitive and any other damages that the Court may deem appropriate;

E. Grant Plaintiff MILES his attorney's fees, costs, and disbursements; and

F. Grant Plaintiff MILES such further relief as the Court deems necessary and proper in the public interest.

JURY TRIAL DEMAND

25. Plaintiffs request a jury trial on all issues of fact and law raised by the allegations in this Complaint.

Respectfully submitted,
JEROME MILES, by his next friend
SHARI YOUNG, Plaintiffs,

By:




Lisa Kane, Attorney for Plaintiff

LISA KANE & ASSOCIATES
Attorneys for Plaintiff
120 South LaSalle Street, Suite 1420
Chicago, IL 60603
(312) 606-0383
Attorney Code No. 06203093

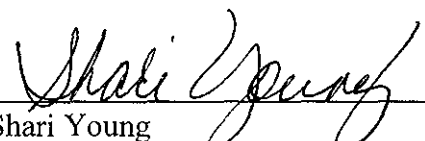
Verification

I, Jerome Miles, declare under penalty of perjury that the foregoing is true and correct. Executed on July 31, 2002.



Jerome Miles

I, Shari Young, declare under penalty of perjury that the foregoing is true and correct. Executed on July 31, 2002.



Shari Young

RIS
①

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

NOTICE OF RIGHT TO SUE

(Issued on request)

<p>To: Mr. Jerome Miles 901 E. 104th St., #A220 Chicago, Illinois 60628</p> <p>Certified No.: 7001 0360 0000 0460 0647</p> <p><input type="checkbox"/> On behalf of a person aggrieved whose identity is CONFIDENTIAL (C.F.R. 1601.7(a))</p>	<p>From: Equal Employment Opportunity Commission 500 West Madison Suite 2800 Chicago, Illinois 60661</p>
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Charge Number 210A203728	EEOC Representative Daniel McGuire, Supervisor	Telephone Number (312) 353-7511
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(See the additional information attached to this form)

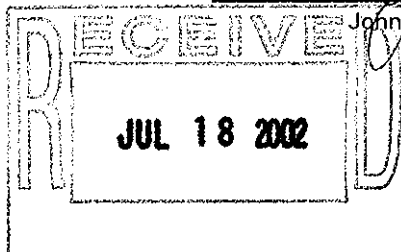
TO THE PERSON AGGRIEVED: This is your NOTICE OF RIGHT TO SUE. It is issued at your request. If you intend to sue the respondent(s) named in your charge, YOU MUST DO SO WITHIN NINETY (90) DAYS OF YOUR RECEIPT OF THIS NOTICE: OTHERWISE YOUR RIGHT TO SUE IS LOST.

- More than 180 days have expired since the filing of this charge.
- Less than 180 days have expired since the filing of this charge, but I have determined that the Commission will unable to complete its process within 180 days from the filing of the charge.
- With the issuance of this NOTICE OF RIGHT TO SUE, the Commission is terminating its process with respect to charge.
- It has been determined that the Commission will continue to investigate your charge.
- ADEA:** While Title VII and the ADA require EEOC to issue this notice of right to sue before you can bring a lawsuit, you may sue under the Age Discrimination in Employment Act (ADEA) any time 60 days after your charge was filed until 90 days after you received notice that EEOC has completed action on your charge.
- Because EEOC is closing your case,** your lawsuit under the ADEA must be brought within 90 days of your receipt of this notice. Otherwise, your right to sue is lost.
- EEOC is continuing its investigation.** You will be notified when we have completed action and, if appropriate, our notice will include notice of right to sue under the ADEA.
- EPA:** While Title VII and the ADA require EEOC to issue this Notice of Right to Sue before you can bring a lawsuit, you already have the right to sue under the Equal Pay Act (EPA) (You are not required to complain to any enforcement agency before bringing an EPA suit in court). EPA suits must be brought within 2 years (3 years for willful violations) of the alleged EPA underpayment.

On Behalf of the Commission

7-11-02
(Date)

John P. Rowe
John P. Rowe, District Director



Enclosures
Information Sheet
Copy of Charge

cc: Respondent(s) KFC, Inc.

DOCKET
AUG 09 2002

JS 44
(Rev. 07/88)

CIVIL COVER SHEET

2

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I (a) PLAINTIFFS

JEROME MILES, by his next friend
SHARI YOUNG

DEFENDANTS

KFC OF AMERICA, INC., d/b/a
KENTUCKY FRIED CHICKEN

02C 5677

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF Cook
(EXCEPT IN U.S. PLAINTIFF CASES)

COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT _____
(IN U.S. PLAINTIFF CASES ONLY)
NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED

(c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER)
Lisa Kane & Associates, P.C.
120 South LaSalle Street
Suite 1420
Chicago, Illinois 60603

ATTORNEYS (IF KNOWN) JOE LINDBERG
MAGISTRATE JUDGE ASHMAN

II. BASIS OF JURISDICTION (PLACE AN X IN ONE BOX ONLY)

- 1 U.S. Government Plaintiff
- 2 Federal Question (U.S. Government Not a Party)
- 3 U.S. Government Defendant
- 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (For Diversity Cases Only)

- | | | | | | |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| | PTF | DEF | | PTF | DEF |
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. CAUSE OF ACTION (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE)

DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY This is an action seeking redress for the violation of Plaintiffs' rights under the Americans With Disabilities Act of 1990, as amended, 42 U.S.C. sec. 12101 et seq.

V. NATURE OF SUIT (PLACE AN X IN ONE BOX ONLY)

CONTRACT		TORTS		FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 362 Personal Injury--Med Malpractice	<input type="checkbox"/> 368 Personal Injury--Product Liability	<input type="checkbox"/> 610 Agriculture	<input type="checkbox"/> 422 Appeal 28 USC 156	<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 365 Personal Injury--Product Liability	<input type="checkbox"/> 366 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 620 Food & Drug	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 630 Liquor Laws	<input type="checkbox"/> 820 Copyrights	<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 330 Federal Employers' Liability	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 640 R.R. & Truck	<input type="checkbox"/> 830 Patents	<input type="checkbox"/> 450 Commerce/ICC Rates/etc.
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 385 Prisoner Petitions		<input type="checkbox"/> 650 Airline Regs	<input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 345 Marine Product Liability			<input type="checkbox"/> 660 Occupational Safety/Health		<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations Act
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans)	<input type="checkbox"/> 350 Motor Vehicle			<input type="checkbox"/> 690 Other		<input type="checkbox"/> 810 Selective Service
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 355 Motor Vehicle Product Liability					<input type="checkbox"/> 850 Securities/Commodities/Exchange
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 360 Other Personal Injury					<input type="checkbox"/> 875 Customer Challenge 12 USC 3410
<input type="checkbox"/> 190 Other Contract						<input type="checkbox"/> 891 Agricultural Acts
<input type="checkbox"/> 195 Contract Product Liability						<input type="checkbox"/> 892 Economic Stabilization Act
						<input type="checkbox"/> 893 Environmental Matters
						<input type="checkbox"/> 894 Energy Allocation Act
						<input type="checkbox"/> 895 Freedom of Information Act
						<input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice
						<input type="checkbox"/> 950 Constitutionality of State Statutes
						<input type="checkbox"/> 890 Other Statutory Actions

VI. ORIGIN (PLACE AN X IN ONE BOX ONLY)

- 1 Original Proceeding
- 2 Removed from State Court
- 3 Remanded from Appellate Court
- 4 Reinstated or Reopened
- 5 Transferred from another district (specify)
- 6 Multidistrict Litigation
- 7 Appeal to District Judge from Magistrate Judgment

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

Check YES only if demanded in complaint:
JURY DEMAND: YES NO

VIII. REMARKS

In response to is not a refiling of a previously dismissed action

General Rule 2.21D(2) this case is a refiling of case number _____ of Judge _____

DATE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

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v.

KFC OF AMERICA, INC., d/b/a KENTUCKY FRIED CHICKEN

Case Number:


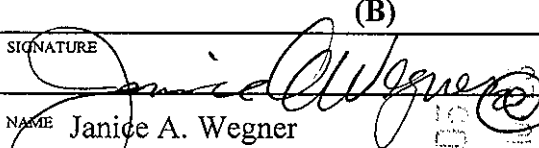
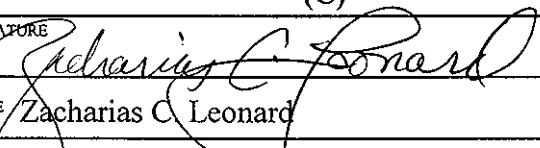
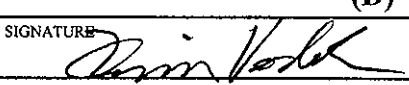
02C 5677

APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEY(S) FOR:

JUDGE LINDBERG

JEROME MILES, by his next friend SHARI YOUNG

MAGISTRATE JUDGE ASHMA

(A)		(B)	
SIGNATURE 		SIGNATURE 	
NAME Lisa Kane		NAME Janice A. Wegner	
FIRM Lisa Kane & Associates, P.C.		FIRM Lisa Kane & Associates, P.C.	
STREET ADDRESS 120 South LaSalle Street, #1420		STREET ADDRESS 120 South LaSalle Street, #1420	
CITY/STATE/ZIP Chicago, Illinois 60603		CITY/STATE/ZIP Chicago, Illinois 60603	
TELEPHONE NUMBER 312-606-0383	FAX NUMBER 312-606-0765	TELEPHONE NUMBER 312-606-0383	FAX NUMBER 312-606-0765
E-MAIL ADDRESS		E-MAIL ADDRESS	
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 06203093		IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 06200062	
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TRIAL ATTORNEY? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
		DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
(C)		(D)	
SIGNATURE 		SIGNATURE 	
NAME Zacharias C. Leonard		NAME Kevin Vodak	
FIRM Lisa Kane & Associates, P.C.		FIRM Lisa Kane & Associates, P.C.	
STREET ADDRESS 120 South LaSalle Street, #1420		STREET ADDRESS 120 South LaSalle Street, #1420	
CITY/STATE/ZIP Chicago, Illinois 60603		CITY/STATE/ZIP Chicago, Illinois 60603	
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DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

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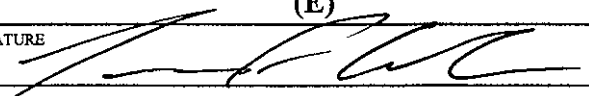
Case Number: **020 5677**

APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEY(S) FOR:

JUDGE LINDBERG

JEROME MILES, by his next friend SHARI YOUNG

MAGISTRATE JUDGE ASHMAN

(E)		(F)	
SIGNATURE 		SIGNATURE	
NAME Terrence F. Canela		NAME	
FIRM Lisa Kane & Associates, P.C.		FIRM	
STREET ADDRESS 120 South LaSalle Street, #1420		STREET ADDRESS	
CITY/STATE/ZIP Chicago, Illinois 60603		CITY/STATE/ZIP	
TELEPHONE NUMBER 312-606-0383	FAX NUMBER 312-606-0765	TELEPHONE NUMBER	FAX NUMBER
E-MAIL ADDRESS		E-MAIL ADDRESS	
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 06274650		IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)	
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TRIAL ATTORNEY? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>	
		DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>	
(G)		(H)	
SIGNATURE		SIGNATURE	
NAME		NAME	
FIRM		FIRM	
STREET ADDRESS		STREET ADDRESS	
CITY/STATE/ZIP		CITY/STATE/ZIP	
TELEPHONE NUMBER	FAX NUMBER	TELEPHONE NUMBER	FAX NUMBER
E-MAIL ADDRESS		E-MAIL ADDRESS	
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TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>		TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>	
DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>		DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>	

FILED - ILLINOIS
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