

**DOCKETED**  
SEP 20 2004

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

**U. S. EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION**

**Plaintiff,**

**v.**

**THE LAW BULLETIN PUBLISHING CO.,**

**Defendant.**

**04C 8063**

**CIVIL ACTION NO. JUDGE CASTILLO**

**COMPLAINT  
JURY TRIAL DEMANDED**

**MAGISTRATE JUDGE MASON**

U.S. DISTRICT COURT  
SEP 17 PM 2:03  
FILED-ED 4

**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 to correct unlawful employment practices on the basis of race and retaliation and to provide appropriate relief to Charging Party Deanna Young ("Young") who was adversely affected by such practices. Plaintiff Equal Employment Opportunity Commission ("EEOC" or "Commission") alleges that the Law Bulletin Publishing Co. ("Law Bulletin") subjected Young to harassment on the basis of her race (Black). EEOC also alleges that the Law Bulletin retaliated against Young by terminating her when she complained of harassment.

**JURISDICTION AND VENUE**

1. Jurisdiction of this Court is invoked pursuant to 28 U.S.C. §§ 451, 1331, 1337, 1343, and 1345. This action is authorized and instituted pursuant to Section 706(f)(1) and (3) of Title VII, 42 U.S.C. § 2000e-5(f)(1) and (3), and § 102 of the Civil Rights Act of 1991, 42 U.S.C. § 1981A.

2. The employment practices hereafter alleged to be unlawful were and are now being committed within the jurisdiction of the United States District Court for the Northern District of Illinois, Eastern Division.

### **PARTIES**

3. Plaintiff, the Equal Employment Opportunity Commission, is an 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. Section 2000e-5(f)(1) and (3).

4. At all times relevant, Defendant Law Bulletin has continuously been doing business in the Northern District of Illinois and has continuously had at least fifteen employees.

5. At all times relevant, Defendant Law Bulletin 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. Sections 2000e(b), (g) and (h).

### **STATEMENT OF CLAIMS**

6. More than thirty days prior to the institution of this lawsuit, Charging Party Deanna Young filed a charge with the Commission alleging violations of Title VII by the Law Bulletin. All conditions precedent to the institution of this lawsuit have been fulfilled.

7. Pursuant to 42 U.S.C. §2000e-5(f)(1), EEOC's representatives attempted to eliminate the unlawful employment practices alleged below and to effect voluntary compliance with Title VII prior to institution of the lawsuit but EEOC was unable to secure a conciliation agreement acceptable to the Commission.

8. Since at least April 2004, the Law Bulletin has engaged in unlawful employment

practices in Chicago, Illinois, in violation of Sections 701(k) and 703(a) of Title VII, 42 U.S.C. Sections 2000e(k) and 2(a). Such unlawful employment practices include racially harassing Young, failing to correct the racially hostile work environment, and retaliating against Young after she complained of harassment by terminating her employment.

9. The effect of the practices complained of above has been to deprive Young of equal employment opportunities and otherwise adversely affect her status as an employee because of her race and/or because she opposed discrimination.

10. The unlawful employment practices complained of in paragraphs 8 and 9 above were intentional.

11. The unlawful employment practices complained of in paragraphs 8 and 9 above were done with malice or with reckless indifference to the federally protected rights of Young because of her race and/or because she opposed discrimination.

**PRAYER FOR RELIEF**

WHEREFORE, the Commission respectfully requests that this Court:

A. Grant a permanent injunction enjoining the Law Bulletin, its officers, successors, assigns, and all persons in active concert or participation with it, from engaging in any employment practice which discriminates because of race and from engaging in any retaliation for opposing discrimination or for participating in any manner in any investigation, proceeding, or litigation under Title VII.

B. Order the Law Bulletin to institute and carry out policies, practices and programs which eradicate the effects of its past and present unlawful practices.

C. Order the Law Bulletin to make whole Young by providing appropriate back

pay with prejudgment interest, in amounts to be determined at trial, and other affirmative relief necessary to eradicate the effects of its unlawful employment practices, including reinstatement.

D. Order the Law Bulletin to make whole Young by providing compensation for past and future pecuniary losses resulting from the unlawful employment practices described in paragraphs 8 and 9 above, in amounts to be determined at trial.

E. Order the Law Bulletin to make whole Young by providing compensation for past and future non-pecuniary losses resulting from the unlawful practices complained of in paragraphs 8 and 9 above, including emotional pain, inconvenience, and humiliation, in amounts to be determined at trial.

F. Order the Law Bulletin to pay to Young punitive damages for its malicious and reckless conduct described in paragraphs 8 and 9 above, in amounts to be determined at trial.

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

H. Award the Commission its costs in this action.

**JURY TRIAL DEMAND**

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

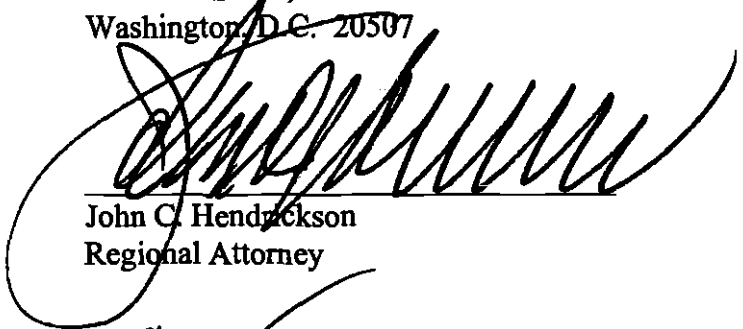
Respectfully submitted,

Eric S. Dreiband  
General Counsel

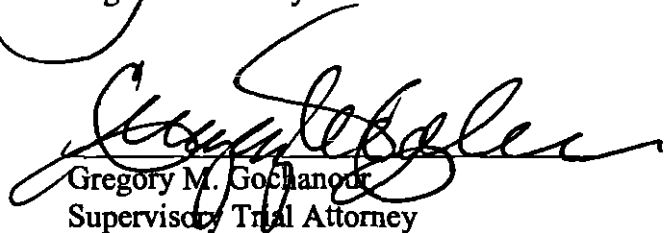
James Lee  
Deputy General Counsel

Gwendolyn Young Reams  
Associate General Counsel

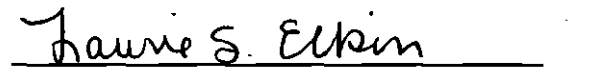
EQUAL EMPLOYMENT OPPORTUNITY  
COMMISSION  
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*Castillo*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

DOCKETED

SEP 20 2004

Civil Cover Sheet **04C 8063**

This automated JS-44 conforms generally to the manual JS-44 approved by the Judicial Conference of the United States in September 1974. The data is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. The information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is authorized for use only in the Northern District of Illinois.

JUDGE CASTILLO

**Plaintiff(s): EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION**

**Defendant(s): THE LAW BULLETIN  
PUBLISHING CO.**

County of Residence:

MAGISTRATE JUDGE MASON  
County of Residence: Cook

Plaintiff's Atty: Laurie S. Elkin  
Equal Employment Opportunity  
Commission  
500 W. Madison, Suite 2800,  
Chicago, Illinois  
(312) 353-7726

Defendant's Atty: Steven L. Loren  
Gardner, Carton & Douglas  
191 N. Wacker Drive, Suite  
3700  
Chicago, Illinois

II. Basis of Jurisdiction: 1. U.S. Gov't Plaintiff

III. Citizenship of Principal  
Parties (Diversity Cases Only)

Plaintiff: - N/A  
Defendant: - N/A

IV. Origin : 1. Original Proceeding

V. Nature of Suit: 442 Employment

VI. Cause of Action: Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §2000e et seq., and Title I of the Civil Rights Act of 1991, 42 U.S.C. §1981a, to correct unlawful employment practices on the basis of racial harassment and retaliation

VII. Requested in Complaint

Class Action: No  
Dollar Demand:  
Jury Demand: Yes

VIII. This case IS NOT a refiling of a previously dismissed case.

Signature: Laurie S. Elkin

Date: September 17, 2004

FILED-ED-1  
04 SEP 17 PM 2:08  
U.S. DISTRICT COURT

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

**EASTERN DIVISION**

**DOCKETED**

**SEP 20 2004**

In the Matter of

U.S. Equal Employment Opportunity Commission  
v.  
The Law Bulletin Publishing Co.

Case Number:

**04C 6063**

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

U.S. Equal Employment Opportunity Commission

*JUDGE CASTILLO*

**MAGISTRATE JUDGE MASON**

(A)		(B)	
SIGNATURE <i>Laurie S. Elkin</i>		SIGNATURE <i>Gregory M. Cocharour</i>	
NAME Laurie S. Elkin		NAME Gregory M. Cocharour	
FIRM Equal Employment Opportunity Commission		FIRM Equal Employment Opportunity Commission	
STREET ADDRESS 500 W. Madison St., Suite 2800		STREET ADDRESS 500 W. Madison St., Suite 2800	
CITY/STATE/ZIP Chicago, IL 60661		CITY/STATE/ZIP Chicago, IL 60661	
TELEPHONE NUMBER 312-353-7726	FAX NUMBER	TELEPHONE NUMBER 312-353-7259	FAX NUMBER
E-MAIL ADDRESS		E-MAIL ADDRESS	
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) ARDC NO. 06210523		IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) ARDC NO. 06210804	
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(D)		(D)	
SIGNATURE <i>John C. Hendrickson</i>		SIGNATURE	
NAME John C. Hendrickson		NAME	
FIRM Equal Employment Opportunity Commission		FIRM	
STREET ADDRESS 500 W. Madison St., Suite 2800		STREET ADDRESS	
CITY/STATE/ZIP Chicago, IL 60661		CITY/STATE/ZIP	
TELEPHONE NUMBER 312-353-8551	FAX NUMBER	TELEPHONE NUMBER	FAX NUMBER
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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 IN DISTRICT COURT  
 SEP 17 PM 2:03  
 EASTERN DISTRICT OF ILLINOIS  
 CHICAGO