

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

| | | |
|-----------------------------------|---|--------------------------------|
| EQUAL EMPLOYMENT |) | |
| OPPORTUNITY COMMISSION, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| and |) | Cause No.3:07-CV-00601-GPM-DGW |
| |) | |
| KAREN COLLIER, |) | |
| |) | |
| Plaintiff-Intervenor, |) | |
| |) | |
| v. |) | |
| |) | |
| CLARICE'S HOME CARE SERVICE, INC, |) | |
| |) | |
| Defendant. |) | |

PLAINTIFF-INTERVENOR'S COMPLAINT

COMES NOW Plaintiff-Intervenor Karen Collier, by and through her attorney, and for her Complaint against Clarice's Home Care Service, Inc. states as follows:

1. Plaintiff-Intervenor Karen Collier brings this action for legal and equitable relief to redress the injuries done to her by Defendant Clarice's Home Care Service, Inc.
2. Plaintiff-Intervenor brings her complaint pursuant to Title VII of the Civil Rights Act of 1964, (as amended), 42 U.S.C. § 2000e-2 and 42 U.S.C. §1981a. Jurisdiction of this Court is invoked pursuant to 28 U.S.C. §1331.
3. The unlawful employment practices complained of herein were committed within the Southern District of Illinois.
4. Plaintiff Karen Collier is an African-American citizen of the United States who at relevant times resided and was a citizen of the City of Sparta, State of Illinois.
5. Plaintiff Karen Collier is an African-American and her skin color is black.

6. At all relevant times defendant Clarice's Home Care Service, Inc. has been an Illinois corporation doing business in the State of Illinois, has continuously had at least 15 employees, and has been an employer within the meaning of 42 U.S.C. §§2000e(b), (g) and (h).

7. Since March and April 2006, defendant has engaged in unlawful employment practices, and in race and color discrimination by refusing to hire plaintiff Karen Collier.

8. As a result of defendant's aforementioned conduct, plaintiff has lost compensation and benefits of employment, has suffered emotional pain, suffering, humiliation, embarrassment, mental anguish, and loss of enjoyment of life.

9. Defendant's conduct was undertaken with malice and reckless indifference to plaintiff's federally protected rights.

10. Plaintiff has incurred and will continue to incur attorney's fees and costs in connection with this matter.

11. Plaintiff filed a timely charge of discrimination with the Equal Employment Opportunity Commission (EEOC). The EEOC has filed suit against the defendant and plaintiff has filed a timely motion to intervene.

WHEREFORE, plaintiff prays for judgment in her favor and against defendant for lost wages and other benefits of employment, front pay, compensatory damages, punitive damages, appropriate injunctive relief, prejudgment interest, attorney's fees, expenses, and costs, and for such additional relief as this Court deems appropriate.

Karen Collier, Plaintiff-Intervenor

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Attorney for Plaintiff-Intervenor

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CERTIFICATE OF SERVICE

I hereby certify that on November 26, 2007, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing(s) to the following:

C. Felix Miller: felix.miller@eoc.gov
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Karen Collier, Plaintiff-Intervenor

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