

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
SOUTHERN DIVISION

EQUAL EMPLOYMENT OPPORTUNITY )  
COMMISSION, )  
10 South Howard Street, 3<sup>rd</sup> Floor )  
Baltimore, Maryland 21201, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
IKEA )  
10100 Baltimore Avenue )  
College Park, Maryland 20740, )  
Defendant. )  
\_\_\_\_\_ )

CIVIL ACTION NO.

COMPLAINT  
JURY TRIAL DEMAND

NATURE OF THE ACTION

This is an action under Title VII of the Civil Rights Act of 1964, as amended, and Title I of the Civil Rights Act of 1991 to correct unlawful employment practices on the basis of race, and to provide appropriate relief to Larry Cook who was adversely affected by such practices. The Commission alleges that Larry Cook, was unlawfully terminated from his position with Defendant because of his race, Black. Moreover, Larry Cook was subjected to disparate terms and conditions of employment when he was terminated in lieu of demotion because of his race, Black.

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

2. The employment practices alleged to be unlawful were committed within the jurisdiction of the United States District Court for the District of Maryland, Southern Division.

### 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, IKEA ("Defendant"), has continuously been doing business in the State of Maryland and the City of College Park, and has continuously had at least 15 employees.

5. At all relevant times, Defendant 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).

### STATEMENT OF CLAIMS

6. More than thirty days prior to the institution of this lawsuit, Larry Cook filed a charge with the Commission alleging violations of Title VII by Defendant. All conditions precedent to the institution of this lawsuit have been fulfilled.

7. On or about March 16, 2000, Defendant engaged in unlawful employment practices at its College Park, Maryland location, in violation of Section 703(a) of Title VII, 42 U.S.C. §2000e-2(a). These employment practices include terminating Larry Cook because of his race, Black, and failing to demote Mr. Cook in lieu of terminating his employment because of his race, Black.

8. The effect of the practice(s) complained of in paragraph 7 above has been to deprive

Larry Cook of equal employment opportunities and otherwise adversely affect his status as an employee, because of his race, Black.

9. The unlawful employment practices complained of in paragraph 7 above were intentional.

10. The unlawful employment practices complained of in paragraph 7 above were done with malice or with reckless indifference to the federally protected rights of Larry Cook.

#### PRAYER FOR RELIEF

Wherefore, the Commission respectfully requests that this Court:

A. Grant a permanent injunction enjoining Defendant, its officers, successors, assigns, and all persons in active concert or participation with it, from engaging in discrimination on the basis of race and any other employment practice which discriminates on the basis of race.

B. Order Defendant to institute and carry out policies, practices, and programs which provide equal employment opportunities for blacks, and which eradicate the effects of its past and present unlawful employment practices.

C. Order Defendant to make whole Larry Cook, 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 but not limited to front pay and reinstatement.

D. Order Defendant to make whole Larry Cook, by providing compensation for past and future pecuniary losses resulting from the unlawful employment practices described in paragraph 7 above in amounts to be determined at trial.

E. Order Defendant to make whole Larry Cook by providing compensation for past and future nonpecuniary losses resulting from the unlawful practices complained of in paragraph 7 above,

including emotional pain, suffering, inconvenience, loss of enjoyment of life, and humiliation, in amounts to be determined at trial.

F. Order Defendant to pay Larry Cook punitive damages for its malicious and reckless conduct described in paragraph 7 above, in amounts to be determined at trial.

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

H. 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,  
EQUAL EMPLOYMENT OPPORTUNITY  
COMMISSION

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\_\_\_\_\_/s/  
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