

STATEMENT OF THE FACTS

PATRICIA COOPER

1. Patricia Cooper is an adult resident and citizen of the State of Maryland.
2. Ms. Cooper worked for the Defendant, as its employee, for several years, until her termination in October 2002.
3. Ms. Cooper was fired from employment with the Defendant in October 2002, shortly after she had complained about unlawful gender discrimination.

THE DEFENDANT

4. The Defendant is a for-profit corporation, doing business in the State of Maryland.
5. In calendar year 2002, the Company reported gross revenues in millions of dollars.
6. Defendant, at all relevant times to this lawsuit, has employed at least 15 employees and been engaged in interstate commerce.

JURISDICTION & VENUE

7. The jurisdiction of this Court is based on federal civil rights employment discrimination laws presenting federal questions.
8. Venue is proper because the unlawful acts and occurrences took place in this District.
9. Ms. Cooper has complied with all prerequisites for bringing this lawsuit.

EMPLOYMENT FACTS

10. In approximately November 2001, Ms. Cooper started working for the Defendant in Greenbelt, Maryland.
11. In approximately February 2002, Ms. Cooper began training for a supervisory position with the Defendant.

12. From March 2002 to her termination in October 2002, Ms. Cooper was the target of unlawful sexual harassment and retaliation by the Defendant.
13. The harassment created a hostile environment and was ongoing and continual.
14. The unlawful sexual harassment by Defendant included but was not limited to:
 - a. unwelcome touching of Ms. Cooper's body;
 - b. offensive conduct such as grabbing Ms. Cooper and telling her, "You need to dance with me,"
 - c. grabbing Ms. Cooper and attempting to drag her into an empty part of the restaurant so that he could be alone with her, and physically blocking a doorway and telling Ms. Cooper she would have to kiss him to enter;
 - d. propositioning Ms. Cooper; and making offensive comments, such as telling Ms. Cooper that his wife shaved her pubic area and asking Ms. Cooper whether she had "given it" to anyone other than her fiancé.

DAMAGE TO MS. COOPER CAUSED BY DEFENDANT

15. Plaintiff was placed in fear as a result of Defendant's management.
16. Ms. Cooper objected to, opposed and complained about the sexual harassment, from March 2002 until her termination in October in 2002.
17. Ms. Cooper actually complained to Defendant's corporate office about the unlawful sexual harassment in approximately August 2002.
18. Defendant did not take prompt or effective remedial action to stop and/or prevent the harassment.

19. After Ms. Cooper objected to and reported the unlawful harassment, she was subject to unlawful retaliation, including but not limited to:
- a. terminating her employment;
 - b. reducing her work hours which resulted in lesser compensation;
 - c. degrading Ms. Cooper in front of others;
 - d. harassing Ms. Cooper in an attempt to force her to quit; and
 - e. faulting Ms. Cooper for work items for which she was not responsible.
20. Ms. Cooper was subjected to mental anguish, pain and suffering as a result of the harassment and retaliation. She suffered greatly emotionally and personally.
21. Ms. Cooper suffered a loss of benefits and wages as a result of the harassment and retaliation.
22. Ms. Cooper was greatly damaged by the unlawful discrimination and retaliation. Further, the damage to Ms. Cooper was compounded by Defendant's actions in disparaging her and attempting to discredit her after she objected to the unlawful employment practices.
23. Ms. Cooper has suffered lost wages and benefits and a loss of future earnings as a direct result of the unlawful discrimination and retaliation.
24. Ms. Cooper suffered emotional injuries from the discrimination and retaliation. She was subjected to worry, anxiety, humiliation, loss of self-esteem, humiliation and embarrassment.
25. Ms. Cooper seeks to be made whole for the losses and damages she has suffered.

26. Defendant acted with absolute malice towards Ms. Cooper and in intentional and reckless disregard for her civil rights. Defendant was evil in its motives in discriminating and retaliating against Ms. Cooper. Defendant knew fully that it was violating the law, but nevertheless continued and escalated its unlawful conduct against Ms. Cooper, and ultimately firing her. Its actions were willful.

VIOLATIONS OF THE LAW

COUNT I – UNLAWFUL GENDER DISCRIMINATION

27. All of the allegations of this Complaint are incorporated fully in this Count.

28. Defendant discriminated against Ms. Cooper on the basis of her gender by creating a hostile environment, sexually harassing her and subjecting her to different treatment than males.

29. Defendant's actions violated Title VII.

30. Ms. Cooper suffered adverse tangible employment action by the Defendant's unlawful conduct, and she was damaged as a result.

31. Plaintiff seeks to recover her lost wages and benefits, lost future earnings, compensatory damages and punitive damages from the Defendant. Plaintiff also seeks reinstatement and an award of attorney fees and costs and pre- and post-judgment interest.

32. Defendant should be ordered to make Ms. Cooper whole Patricia Cooper by providing compensation for pecuniary and nonpecuniary losses, including emotional pain, suffering, anxiety, depression, embarrassment, degradation, and humiliation.

_____/s/_____
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